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By post and email to:
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Our Ref: SA33748/HH
Local Plan site ref: R18/P2/127A
Date: 7th June 2019

Dear Michael,

REPRESENTATIONS ON THE SUBMISSION WARRINGTON LOCAL PLAN ON BEHALF OF AINSCOUGH STRATEGIC LAND

Ainscough Strategic Land (ASL) has serious concerns about a number of aspects of the Submission Warrington Local Plan and contends that it is not currently 'sound' for the reasons given in the attached representations.

Our representations focus on the following policies:

- Policy DEV1 Housing Delivery
- Policy DEV4 Economic Growth and Development
- Consequential changes to the Policies Map
- Policy GB1 Green Belt
- Policy OS9 Land north of Winwick

Ainscough Strategic Land have acquired an interest in 37 hectares of land off Delph Lane, Winwick, a site which ASL are committed to bringing forward for development. ASL have an excellent reputation for delivery and will ensure that the above site is delivered for development without delay, assisting Warrington Borough Council in meeting the borough's development needs.



Ainscough Strategic Land wishes to fully participate in the examination of the Local Plan due to its serious concerns about the Plan's evidence base and its effectiveness. As a delivery partner with a strong reputation for assisting local planning authorities in achieving their development needs, ASL can make a significant contribution to the Local Plan process.


We hope to work positively with Warrington Borough Council during the course of the Local Plan's examination to achieve a sound, modified Plan.

Yours sincerely,



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Encl.

Representations on behalf of Ainscough Strategic Land





**Warrington Local Plan
Pre-submission consultation**

Representations on behalf of Ainscough Strategic Land
June 2019



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1. Introduction

This representation on the Submission Warrington Borough Local Plan has been prepared by Berrys on behalf of Ainscough Strategic Land (ASL). We have significant concerns in relation to the evidence base, strategy and effectiveness of the Plan.

The National Planning Policy Framework requires that Plans are 'sound' if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

Ainscough Strategic Land considers that the Submission Plan does not currently meet any of these 'tests of soundness' with a particular focus on the following policies:

- Policy DEV1 Housing Delivery
- Policy DEV4 Economic Growth and Development
- Consequential changes to the Policies Map
- Policy GB1 Green Belt
- Policy OS9 Land north of Winwick

In each section of this representation we set out a summary of ASL's specific area of concern before exploring in detail the reasons that the relevant policy is unsound. Each section ends with a clear suggestion as to how the Plan might be modified to make it sound.

Ainscough Strategic Land have acquired an interest in 37 hectares of land off Delph Lane, Winwick which ASL are committed to bringing forward for development. ASL have an excellent reputation for delivery and will ensure that the above site is delivered for development without delay, assisting Warrington Borough Council in meeting the borough's development needs.

2. Policy DEV1 Housing Delivery

Ainscough Strategic Land consider the Plan puts too heavy a reliance on Green Belt release in South Warrington, which will do little to alleviate high levels of commuting from St. Helens and Wigan boroughs. Additional housing sites would make the Plan more robust in relation to housing delivery and protect WBC from failing the housing delivery test in future years.

We consider the Plan to be unsound because it is:

- i.) Not effective and not consistent with national policy because it lacks flexibility;
- ii.) Not positively prepared and justified as an appropriate strategy for reducing congestion;
- iii.) Not effective in relation to meeting the Housing Delivery Test;
- iv.) Not justified or effective in relation to distribution of residential development; and
- v.) Not positively prepared to meet the area's needs over the longer term 2037-2047

These are explored in turn below.

i) Not effective and not consistent with national policy because it lacks flexibility

Paragraph 11 of the Framework states: *“plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.”*

The limited number of allocations in the Warrington Local Plan runs the risk of putting too many eggs in one basket. This is highly risky when the economy needs to remain flexible and able to respond to a variety of business needs and residential market pressures.

Reliance on a limited number of landowners reduces competition, which in turn drives up land prices and makes house prices less competitive, which in turn reduces delivery rates. The need for a variety of sites is recognised in the opening paragraph of the housing chapter in the Framework, which states:

*“To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and **variety of land** can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”* (NPPF 59. emphasis added)

The Plan's concentration of housing allocations to the south of Warrington unnecessarily concentrates development in a limited number of locations, which limits market absorption and thereby risks under-delivery.

None of the proposed residential allocations are close to railway lines, where new stations might be built in future years. The recently constructed Warrington West railway station at Great Sankey shows how rail travel can be maximised where residential areas adjoin an existing railway line. To future-proof the Local Plan, some of the allocations should adjoin existing railway lines, for example along the

Warrington to Newton-le-Willows railway line. This is particularly relevant for Green Belt land release, to reflect paragraph 138 of the Framework which gives first consideration to land which is well served by public transport. We return to this issue under our representations on policies GB1 and OS9.

In light of the above considerations, the Plan must provide a mix of sites of different sizes, landowners and locations. The Plan does not currently have sufficient variety of locations and types of site to provide the flexibility necessary to be effective and to meet national policy.

ii) *Not positively prepared and justified as an appropriate strategy for reducing congestion*

Transport is a fundamental aspect of the Plan. Objective W4 seeks, *“To provide new infrastructure and services to support Warrington’s growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.”*

The Plan proposes to deal with congestion through the provision of new roads and bridges. However these are expensive and may do little than address the needs for extra capacity to cope with new development at Port Warrington, the SW extension and the Garden City. For instance, the proposed Western Link Road will only be single carriageway due to cost constraints and therefore it is unlikely to make a radical difference to existing congestion.

One of the root causes of Warrington’s congestion is commuting. The high level of commuting into and out of the Borough was identified as a key sustainability issue for the Plan in Table 2.1, page 5 of the Sustainability Appraisal March 2019. In addition to providing new roads, it is important for the Plan to seek to tackle the root problems of a mismatch between the location of housing and the location of employment.

Furthermore, the Plan Spatial Strategy recognises that the in-commuting problem is set to worsen, stating in paragraph 3.4.13 on page 30 of the Submission Plan:

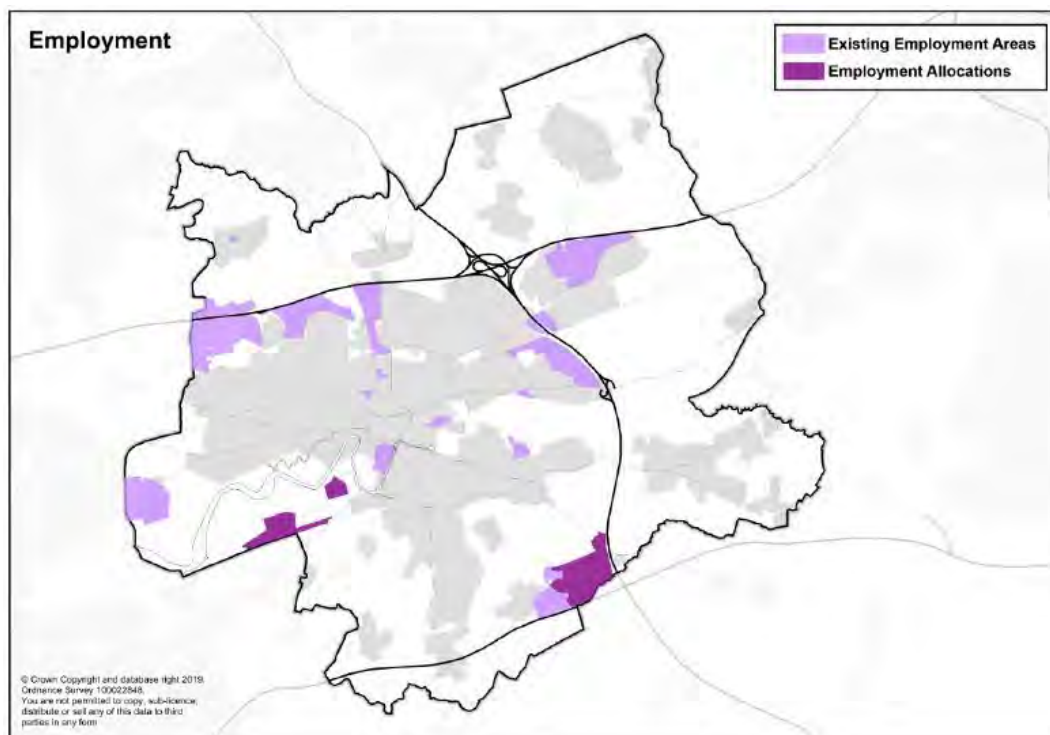
“It is likely that there will be an absolute and proportionate increase in the number of people commuting into the Borough to work. The consequences from this are likely to include increasing congestion on Warrington’s transport network and a risk of worsening air quality on some of the busier transport corridors where people live.”

The Economic Development Needs Study 2019 provides detailed evidence from the 2011 census on net daily commuting flows, reproduced overleaf for ease of reference. There is a total net flow into Warrington Borough of 14,179 commuters per day, with the largest numbers of these flows being from Wigan with 4,539 movements per day and from St. Helens with 4,288 net movements per day. This strongly suggests a need for residential development to the north of Warrington to contribute to greater sustainability by reducing commuting flows..

Table 19 – In and Out flows of Warrington Commuters

	Work Locations of Employed Residents of Warrington OUTFLOW	Origins of Warrington Workers INFLOW	Net Flow of Workers into Warrington
Halton	4,674	5,786	1,112
Manchester	4,232	1,804	(2,428)
Trafford	3,226	1,876	(1,350)
Liverpool	2,628	3,191	563
St. Helens	2,516	6,804	4,288
Cheshire West and Chester	2,462	3,894	1,432
Salford	2,155	1,738	(417)
Cheshire East	2,005	2,073	68
Wigan	2,000	6,539	4,539
Knowsley	1,124	1,430	306
Stockport	801	1,005	204
Bolton	525	1,236	711
Sefton	406	1,246	840
West Lancashire	396	626	230
Wirral	382	1,156	774
Bury	228	580	352
Tameside	226	492	266
Rochdale	209	420	211
Oldham	204	423	219
Preston	199	254	55
South Ribble	193	363	170
Chorley	149	496	347
Blackburn with Darwen	148	208	60
Elsewhere in England and Wales	3,905	5,532	1,627
Total	34,993	49,172	14,179

Source: ONS 2011 Census



The Plan identifies nine areas as the primary locations for industrial, warehousing, distribution and other B class use employment in section 3 of Policy DEV4. Of these, 5 are on the north side of Warrington along the M62 corridor, namely Omega, Winwick Quay, Birchwood Park, Lingley Mere and Gemini. The distribution of employment in the borough is summarised in figure 4 of the Submission Plan, reproduced on the previous page for ease of reference:

The travel-to-work and distribution of employment evidence strongly suggests a need for residential development to the north of Warrington to reduce commuting flows. However, the current spread of housing allocations is inconsistent with this existing distribution of employment, with the majority of housing allocations in south Warrington. A greater proportion of the residential allocations should therefore be identified in north Warrington.

iii) Not effective in relation to meeting the Housing Delivery Test

From November 2020, the Housing Delivery Test renders a Plan out-of-date if a local planning authority is not delivering at least 75% of its housing requirement (footnote 7 to paragraph 11d of the Framework). Figures published by DCLG in early 2019 are reproduced below and show that Warrington is at risk from the Housing Delivery Test.

Fig 1: DCLG HDT Measurement 2018

Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2018
2015-16	16-17	17-18		2015-16	16-17	17-18		
923	902	792	2,617	595	492	359	1,446	55%

In order to avoid missing the Housing Delivery Test in November 2020, the Plan has to achieve a significant step change in delivery. WBC's expectations as to how housing delivery will increase in future years are set out in its Housing Trajectory. For ease of reference this is attached at **Appendix 1** to this representation.

We question five assumptions that underpin the Plan's housing delivery ambitions:

- Delivery of existing SHLAA sites nces;
- Inclusion of a small sites allowance in the first three years;
- The very high density of 130dph in Inner Warrington and 275dph in the Town Centre;
- The timescales for delivery of the Waterfront developments;
- Market absorption rates in Southern Warrington.

The Housing Trajectory places a high reliance on SHLAA sites, with an estimated increase in delivery to 421 dwellings in 2020/21 and 546 dwellings in 2021/22 from this source alone, with delivery between 200-399 dwellings per annum until 2028. It also expects a high degree of construction in the Town Centre, with 415 dwellings in 2020/21, 323 dwellings in 2021/22 and 517 dwellings in 2022/23. Town Centre sites are then expected to continue to deliver high numbers of dwellings, with

a peak of 555 dwellings in 2027/28, despite not having delivered anywhere near these numbers in the past. This is a major change in delivery despite little change in the circumstances in which SHLAA and town centre sites have found themselves over the past decade.

We question why SHLAA and Town Centre sites are considered likely to deliver these numbers when these sites, which are not new allocations but part of the existing urban area, have not delivered such numbers in the past. The Submission Local Plan has not changed the situation in which these sites have been for many years and therefore the expected increase in delivery appears over-optimistic.

While we do not dispute the appropriateness of a small-sites allowance, the purpose of this allowance is to accommodate small-scale windfall developments that will obtain planning consent over the plan period. For the first three years of the housing trajectory it duplicates existing planning consents. It should therefore be removed from the first three years of the trajectory as existing planning consents are already separately accounted for.

It appears unlikely that Inner Warrington will achieve densities of 130dph and the Town Centre will achieve densities of 275dph, when there is little evidence of these types of densities having been regularly reached in Warrington in the past. They appear to be over-optimistic assumptions simply designed to reduce the amount of land required by the Plan.

Furthermore, delivery of development at the Waterfront relies on the construction of the Western Link Road, the timescale for which is already slipping. It will take time for necessary infrastructure to be put in place and for land to be assembled. There is also a need for costly remediation of sites and for the demolition of existing buildings before sites are ready for development. On this basis we consider that the housing trajectory anticipates too high a level of development in the first five years of the plan period.

The Housing Trajectory expects delivery from the Garden Suburb of around 260 - 396 dwellings between 2024-2037 and a further 117 dwellings per annum from the South West Urban Extension. In total nearly 400-500 dwellings per annum are to be delivered from new allocations on the south side of Warrington. We question whether the market can reliably absorb such high numbers in a relatively limited geographical area consistently for every year shown on the housing trajectory.

The 2018 'Independent Review of Build Out' by Sir Oliver Letwin concluded that the single most significant limiting factor for housing delivery was the ability of the market to absorb new housing. For this reason the report recommended that a mix of housing types was essential to increase delivery on large sites. The same principle also applies to the geographical mix across a local authority area. In our view, a significant increase in delivery rates in Warrington Borough is reliant on a geographic mix of sites to maximise market absorption rates. Additional allocations are needed for the Plan to be able to meet the Housing Delivery Test.

A combination of the reasons above leads us to consider that the housing trajectory has over-estimated delivery by at least 900 dwellings. Policy DEV1 should be amended accordingly, with a minimum of 1,985 homes instead of 1,085 homes needed on allocated sites to be removed from the Green Belt.

iv) *Not justified or effective in relation to distribution of residential development*

Policy DEV1 makes a distinction between the main urban area of Warrington in section 2 of the policy, large urban extensions in section 3 of the policy, and outlying settlements in section 4 of the policy. This distinction is somewhat artificial in the case of Winwick, which is closely connected to the main urban area.

To the north of Warrington, the boundary between the main urban area and the outlying settlements is often artificially equated with the M62 corridor, whereas in reality the development boundary for the urban area includes land north of the M62 at Omega and at Junction 9, Winwick. New development of around 300 houses at Delph Park took place around 20 years ago and there is now a continuously built up area from Winwick Quay to Winwick (see pages 15-17 of this representation). There is a strong link between Winwick and the main urban area along the A49 corridor, with four bus services providing six buses an hour (bus nos 19, 22, 329 and 360). In light of this, Winwick is not in the same category as the other outlying settlements but is much more strongly connected to the main urban area, particularly to the many employment opportunities in northern Warrington.

The rationale for directing only 130 homes to Winwick is explained in paragraph 3.3.17 of the Submission Plan which states: *“An urban extension to the north of Warrington would have considerable traffic impacts on the A49 and Junction 9 of the M62. It would also impact on the character of Winwick and the designated historic battle ground.”*

This explanation is contradicted by the Peel Hall allocation. If traffic impacts were too great, the Submission Plan would not include Policy MD4 to allocate 69 hectares of land at Peel Hall to deliver *“a new sustainable community”* of around 1,200 new homes just beside Junction 9 of the M62. A high proportion of the traffic from the Peel Hall development will use the A49.

Policy MD4 Peel Hall includes in Section 21 a requirement for, *“A comprehensive package of transport improvements to support the urban extension.”* These include, *“b. Junction improvements and new highway connections linking the development to the Local Road Network, and highway works to the Strategic Road Network, as agreed by the Council and Highways England.”*

In light of this, the Plan’s justification for limiting the amount of development north of Warrington is contradictory and unsound. We have shown that traffic impacts are being addressed and we will show on pages 25– 28 of this representation that alternative sites exist at Winwick that will not have any impact on the designated historic battleground. The decision to limit development at Winwick is not justified as the most appropriate strategy.

In summary, the plan's aspirations for very limited growth of only 130 homes at Winwick is unnecessarily constrained. Ainscough Strategic Land strongly support increasing the number of homes proposed for Winwick to a level that reflects its close connections with the main urban area and its potential to make a strong contribution to sustainable development in the borough, by increasing it to around 600 homes.

v) Not positively prepared to meet the area's needs over the longer term

The Framework expects the standard method to be used in deriving housing requirements. The standard method is intended to provide a *minimum* housing requirement and we therefore support policy DEV1 referring to housing requirements over 2017-2037 as a *minimum* requirement. For consistency, the average number of dwellings per year should also be expressed as a minimum of 945 homes per annum.

The Framework states in paragraph 60 that the standard method should inform "*strategic policies*". These are broader than just housing and include longer term policies in the Plan.

Paragraph 136 in the Framework states, "***Strategic policies*** should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period." (emphasis added) The standard method for arriving at housing numbers is therefore relevant not just to the plan period 2017 to 2037, but to policies to ensure sufficient land is safeguarded to meet the housing needs beyond the plan period.

Table 2 on page 36 of the Plan addresses development needs 2037 to 2047. However it ignores the standard method and instead applies an indicative housing requirement of 617 dwellings based on the Local Housing Needs Assessment, projected forward to 6,170 dwellings over the ten years 2037-2047. This is contrary to the Framework's requirement in paragraph 60 that all "*strategic policies*" should be informed by the standard method. The figure used should be based on the standard method which we calculate as follows:

Figure 2. Calculation of housing needs

The 2014-based ONS household growth projections for Warrington show a projected 92,000 households in 2019 rising over 10 years to 100,000 households in 2029, equivalent to an average growth rate of 800 households per annum over 2019-2029.

The adjustment factor is the median workplace-based affordability ratio. Warrington's latest figure, to March 2018, is 6.32. The adjustment factor is therefore 0.145 as shown below:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 = \frac{(6.32 - 4)}{4} \times 0.25 = 0.145$$

Applying the standard method, Warrington's annual housing need is therefore:

$$\begin{aligned} \text{minimum annual housing need} &= \text{projected household growth} \times (1 + \text{adjustment factor}) \\ &= 800 \text{ households p.a.} \times (1 + 0.145) \\ &= \mathbf{916 \text{ households p.a.}} \end{aligned}$$

This is very similar to the Council’s calculation of 909 dwellings per annum in paragraphs 2.10 & 2.11 of its Local Housing Needs Assessment. We would therefore accept 909 dwellings per annum or 9,090 over ten years 2027-37.

Additional allowances are required as follows:

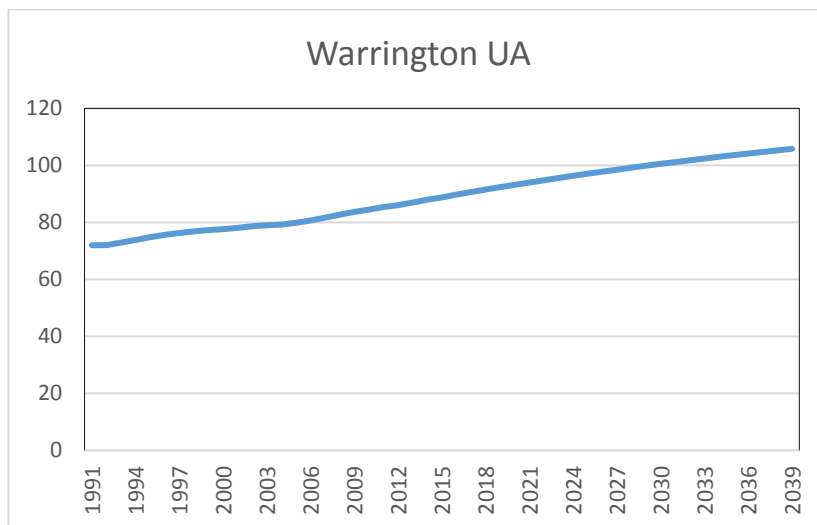
- 2.3% empty dwellings allowance (houses in the process of being sold or in probate), increasing the number of homes to 9,299; and
- 10% flexibility allowance to ensure delivery, as recommended by paragraph 73b of the Framework, therefore land equivalent to 10,229 dwellings is required to be identified.

The necessary changes to bring the Plan in line with the Framework and positively plan to meet the area’s needs whilst providing certainty over Green Belt boundaries is therefore as follows:

Table 2 – Development needs beyond the Plan Period Indicative Housing Requirement 2037 to 2047	
Annual household growth 2027-37*	617 <u>909</u>
Projected forward 2037 to 2047	6,170 <u>9,090</u>
Empty properties allowance	<u>209</u>
10% flexibility allowance	<u>930</u>
Number of homes required 2037 to 2047**	6,312 <u>10,229</u>

We strongly dispute the Council’s claim that household growth will diminish over time. There is no evidence that Warrington’s housing needs will be less beyond the plan period. The Government’s household projections are shown in figure 3 below. There is no projected change in household growth in the latter part of the plan period and no reason to assume that the calculation using the standard method will suddenly drop to approximately two-thirds of its current level.

Figure 3 DCLG table 406: ONS 2014-based household projections



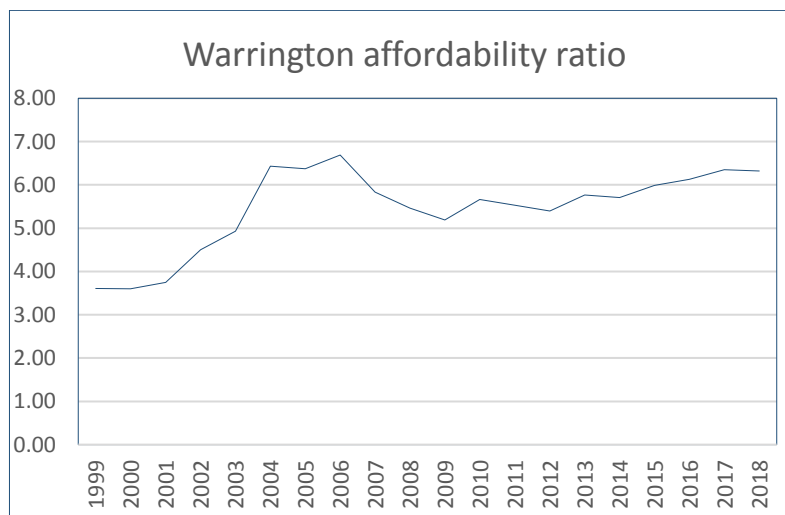
If the Local Plan is successful, Warrington will continue to attract in-migration from other parts of England and Wales, which will continue and potentially accelerate household growth in the borough. By assuming otherwise, the Plan appears to doubt its own strategy.

The 2014-based ONS household projections apply the relatively low household formation rates that were observed after the financial crisis of 2007-2008. There is no reason to believe that even lower household formation rates will exist towards the end of the plan period, unless there is a significant worsening of housing affordability.

The Council clearly does not believe that this is likely, stating in paragraph 4.1.25, “*In providing a positive plan for growth, the Council considers that by the end of the Plan period, house price affordability will no longer be a significant issue in Warrington and therefore any uplift beyond the household projections will be minimal.*” The Council does not provide any evidence whatsoever for this statement.

The Government’s published figures for the ratio of median house prices to median workplace-based earnings for Warrington are shown in the graph overleaf. Over the past 20 years the ratio has nearly doubled, from **3.61** in 1999 to **6.32** in 2018. The data reflects the house price crash of 2007-2009 that followed the financial crisis, but otherwise there is no evidence of any reversal in the general upwards trend.

Figure 4 DCLG affordability ratio table 5c published 28/3/19



Modifications necessary to Policy DEV1

To make the Plan 'sound' we suggest the following changes, with proposed additions underlined and proposed deletions ~~crossed through~~:

The modifications to the second half of table 2 reflect our representations on future housing supply under GB1 Green Belt on pages 19 – 24 of this representation.

Policy DEV1 – Housing Delivery

1. Over the 20 year Plan period from 2017 to 2037, a minimum of 18,900 new homes will be delivered to meet Warrington's housing needs and support its economic growth aspirations. This equates to an average of 945 homes minimum per annum.

4. A minimum of ~~4,085~~ 1,985 homes will be delivered on allocated sites to be removed from the Green Belt adjacent to the following outlying settlements and adjacent to the main urban area, reflecting their contribution to the sustainable growth of Warrington:

- a. Burtonwood – minimum of 160 homes
- b. Croft – minimum of 75 homes
- c. Culcheth – minimum of 200 homes
- d. Hollins Green – minimum of 90 homes
- e. Lymm – minimum of 430 homes
- f. Winwick – minimum of ~~430~~ 600 homes

Table 2 – Development needs beyond the Plan Period Indicative Housing Requirement 2037 to 2047	
Annual household growth 2027-37*	617 <u>909</u>
Projected forward 2037 to 2047	6,170 <u>9,090</u>
<u>Empty properties allowance</u>	<u>209</u>
<u>10% flexibility allowance</u>	<u>930</u>
Number of homes required 2037 to 2047**	6,312 <u>10,229</u>
Indicative Housing Supply 2037 to 2047	
Additional supply within Plan from flexibility	1,890
Illustrative Town Centre capacity	1,816 <u>500</u>
Small sites allowance	608
Garden Suburb delivery post 2037	2,289
Total indicative supply	6,603 <u>3,397</u>

Our reasons for the proposed modifications to Table 2: Indicative Housing Supply are explained under GB1 Green Belt on page 19 of this representation.

3. Policy DEV4 Economic Growth and Development

There is strong local and regional demand for a range of B-use class developments including logistics and the expansion of the successful Winwick Quay industrial estate. Land at Delph Lane has high attractiveness to the market using the criteria in the Economic Development Needs Assessment (EDNA) and therefore the Plan should enable land between the railway line and M62 junction 9 to come forward in future years to meet economic needs in the borough.

We consider that Policy DEV4 is unsound because it is:

- i.) Not positively prepared in relation to accommodating development needs
- ii.) Not Justified or effective in relation to the distribution of employment land

These are explored in turn below.

i.) Not positively prepared in relation to accommodating development needs

The Council's 'Economic Development Needs Assessment' (EDNA) and 'Review of economic forecasts and housing numbers' link the borough's economic prosperity to the provision of land for development. We welcome the Council's recognition that the amount of land allocated in the Local Plan is directly related to how much economic growth it will attract. The more land the Local Plan identifies, the less constrained will be its growth prospects in an increasingly competitive world.

We agree with the EDNA assessment that the actual take-up of employment land over the past 20 years has been much higher than what would have been predicted based on econometric forecasting, and agree with their conclusions that the need is 361.71 ha to 2037. However, there are three areas in which the Plan fails to make provision for employment needs, namely:

- Long-term employment needs for 2037 to 2047;
- Allocations for non B-use employment needs;
- Expansion of the successful Winwick Quay industrial area.

The EDNA (March 2019) notes on page 25 that, "*In terms of employment land, a five-year buffer at 14.65 ha/year is already allowed for in need calculations, in addition to the initial 2017-2037 requirement. Thus, the further employment land requirement, to 2047, will only be for another five years, i.e. 73.25 ha, extended to 76.20 ha. 71 percent of this will be in the Green Belt.*"

The Submission Plan ignores this evidence of need for 2037-2047 in relation to its decisions on long term Green Belt boundaries and the need for safeguarded land. On this basis it is 'unsound' as it has not been positively prepared to meet the area's objectively assessed needs.

The EDNA focuses on land for B1, B2 and B8 uses. It does not seek to estimate the amount of land needed for other employment uses, for example health care, leisure uses such as private gyms and services such as veterinary clinics, etc. Additional land is needed for such uses in order to protect the existing employment areas from pressure to accommodate non B-use class development.

Ainscough Strategic Land's site at Winwick adjoins the Hollins Park Hospital and would make an ideal location to accommodate a variety of employment-related uses including those that are not in the B-use classes.

The EDNA notes in paragraph 8.11 under 'Recommendation 4 – Areas of Search for New Allocations' that it has identified the strongest areas of search for employment land. It includes land near M62 Junction 9: "*Winwick Quay continues to be a focus for industrial market demand, albeit with a growing emphasis on B8 trade uses. With recent losses to retail and car showrooms, there is no growth land remaining in the Junction 9 area, south of the M62. Stakeholders identify that demand in the rural north of the Borough is focused at locations with good motorway access, particularly Junctions 8-9 M62.*" (EDNA page 162)

The Submission Plan does not however make any provision for this need. In this it is contrary to paragraph 83 of the Framework which requires that "*Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas...*"

Land adjoining Junction 9 of the M62, linked to Winwick Quay industrial area by Mill Lane, is available and has been promoted to WBC throughout the Plan process (see 2017 site promotion in **Appendix 4**). There is no reason to prevent Winwick Quay industrial area from expanding to meet demand from local businesses, particularly as the 37 hectare Delph Lane site is assessed by WBC as only making a 'weak' contribution to the purposes of the Green Belt.

In summary, the Plan is 'unsound' as it fails to positively meet all its employment needs.

There are suitable, available and achievable sites available to meet the borough's employment needs, particularly ASL's 37 hectare site adjoining Junction 9 of the M62.

ii.) Not Justified or effective in relation to the distribution of employment land

The Framework states in paragraph 80 that, "*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.*"

The Submission Plan recognises that Warrington's strengths include logistics, being well served by the motorway network. However the Plan fails to adequately utilise this strength on the M62 corridor, with no allocations within the borough proposed in the Submission Plan.

Furthermore, the A49 is an established corridor that is perennially popular with employers. It has good public transport links and the EDNA notes that, "*Winwick Quay and Woolston continue to dominate in terms of market deals.*" (EDNA paragraph 3.16). However the Plan does not provide any land for the expansion of Winwick Quay. This is a major omission in the distribution of new land for employment development that makes the Plan unsound.

The only land identified to be released from the Green Belt for employment needs is at the proposed Garden Suburb, at Port Warrington and at the Waterfront Business Hub. This approach of concentrating new employment land in only 3 locations does not provide the market with much choice. It is essential that businesses have a variety of sites & locations, as one size does not fit all.

Reliance on a limited number of landowners reduces competition and limits the options open to businesses. In turn this increases the likelihood that companies will search further afield and locate in competing boroughs' areas. Such an approach undermines the Plan's objectives for sustainable growth.

In summary, we strongly disagree with the Plan's proposals to make no provision for additional employment land in the north of the borough. Land is available and highly deliverable immediately adjoining Winwick Quay, north of junction 9 of the M62, at the site on Delph Lane. To meet the tests of being justified and being effective, the Local Plan must include a wider range of allocations of different sizes, in a mix of locations, to provide choice and competition in the market.

Modifications necessary to Policy DEV4

To make the Plan 'sound' we suggest the following changes, with proposed additions underlined and proposed deletions ~~crossed through~~:

Policy DEV4 - Economic Growth and Development

4. The following sites will be removed from the Green Belt and allocated as new Employment Areas in order to provide sufficient land to meet Warrington's Employment Land Requirement:

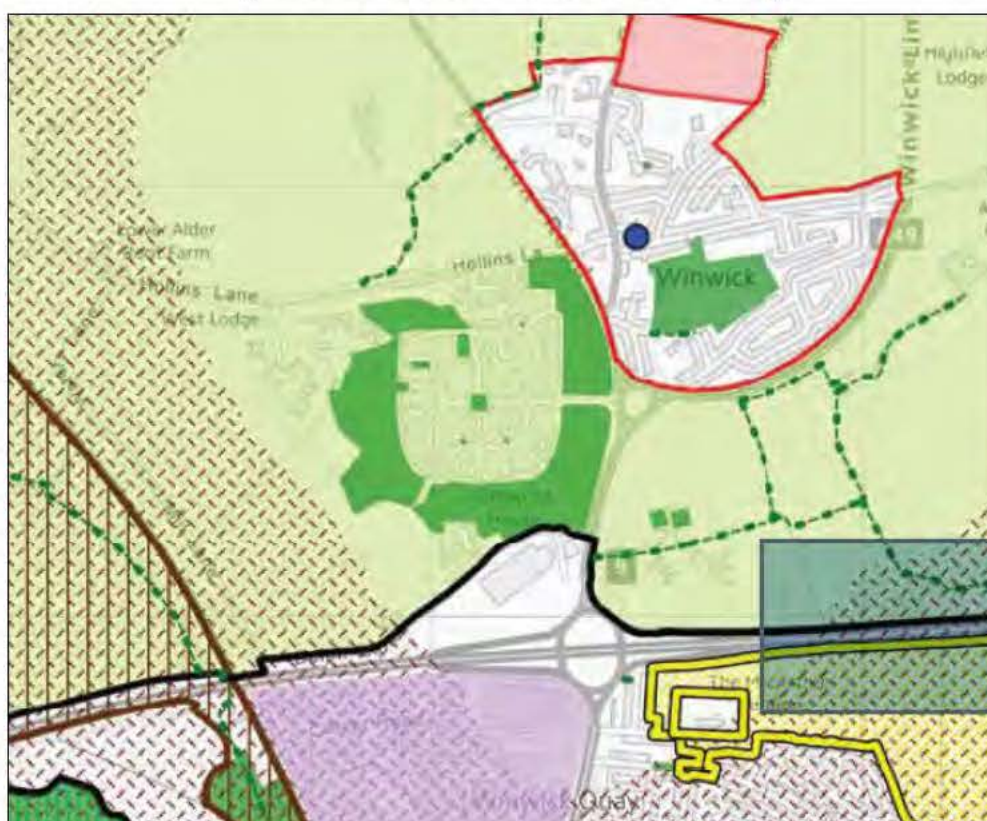
- a. Garden Suburb – 116 hectares
- b. Port Warrington – 74.36 hectares
- c. Waterfront Business Hub – 25.47 hectares
- d. Winwick Quay extension

4. Consequential changes to the Policies Map

Explanatory text under policy GB1 states, “5.1.20 The only amendments to boundaries of the settlements are those required to facilitate the allocated development sites in the Inset Settlements, including consequential changes necessary to ensure a robust Green Belt boundary.”

However the Policies Map and its summary in figure 6 of the Plan do *not* reflect all consequential changes necessary to ensure a robust Green Belt boundary. At Winwick, the Green Belt boundary departs from reality on the ground, ignoring the development of around 300 dwellings at Delph Park and the construction of a new hospital south of Hollins Lane the past 20 years. The Green Belt boundary should be adjusted to match reality.

Figure 5. Extract from Submission Policies Map



We consider the Plan to be unsound because it is:

- i.) Not Justified because it is contrary to national policy and the evidence base;
- ii.) Not effective because it includes significant built-up areas within the new Green Belt boundary and consequently the boundary is not robust.

These are explored in turn below.

j) Not justified because it is contrary to national policy and the evidence base

Arup's original Green Belt Assessment October 2016 identified the Green Belt parcels shown below. It did not include the new housing estate at Winwick Park or Hollins Park Hospital in any Green Belt parcel. No reason is given as to why Arup did not include these parts of the Green Belt in their Green Belt Assessment but it is a significant omission.

It seems likely that Arup did not include Delph Estate and Hollins Park Hospital in the Green Belt Assessment because these sites make no contribution to the purposes of the Green Belt as defined in paragraph 134 of the National Planning Policy Framework.

Figure 6. Extract from Green Belt Assessment (2016) Figure F Parcels Map



Paragraph 133 of the Framework states, “*the essential characteristics of Green Belts are their openness and their permanence.*” Built up areas are therefore normally not included in the Green Belt unless they are relatively small villages that justify being ‘washed over’ by the Green Belt designation. Large areas of new buildings adjoining an urban area would not normally be considered part of the Green Belt.

Green Belt Parcels W11 and W12 are assessed in Appendix G of the Arup October 2016 report (page H63). Both parcels have a ‘weak’ overall contribution to the purposes of the Green Belt.

Parcels W11 and W12 both make a ‘weak’ contribution to purpose (d) to preserve the setting and special character of historic towns; a ‘moderate’ contribution to purpose (c) to assist in safeguarding the countryside from encroachment; and a ‘weak’ contribution to purpose (b) to prevent neighbouring towns of Warrington and Newton-le-Willows from merging into one another. For purpose (a) to check the

unrestricted sprawl of large built-up areas, parcel WI1 is considered to make a 'weak' contribution and parcel WI2 is considered to make 'no' contribution as it does not adjoin the Warrington urban area.

To the south of parcel WI1 is a B&Q retail store which, like all the land south of Delph Lane, is not in the Green Belt.

Within parcel WI1 lies a complex of barns known as Delph Farm. A planning application for the conversion of these barns to form 19 dwellings was submitted on 15th April 2019 and is currently being considered by Warrington Borough Council. The conversion of buildings in the Green Belt is consistent with national planning policies and it is therefore reasonable to assume that planning consent for residential dwellings will be granted at some point.

Delph Farm is separated from the Delph housing estate by public open space comprising mown grass and parkland. This parkland forms a landscaped buffer between the Delph Estate and the A49 Newton Road to the east and Delph Lane to the south. It would be inappropriate to leave this landscaped buffer in the Green Belt as it does not form a strong Green Belt boundary.

The proposed unaltered Green Belt boundary and the continuing designation of Delph Estate, Hollins Park Hospital and parcels WI1 and WI2 as 'Green Belt' is unsound because it ignores reality on the ground and the evidence of the Arup Green Belt Assessment.

ii) Not effective as the boundary is not robust

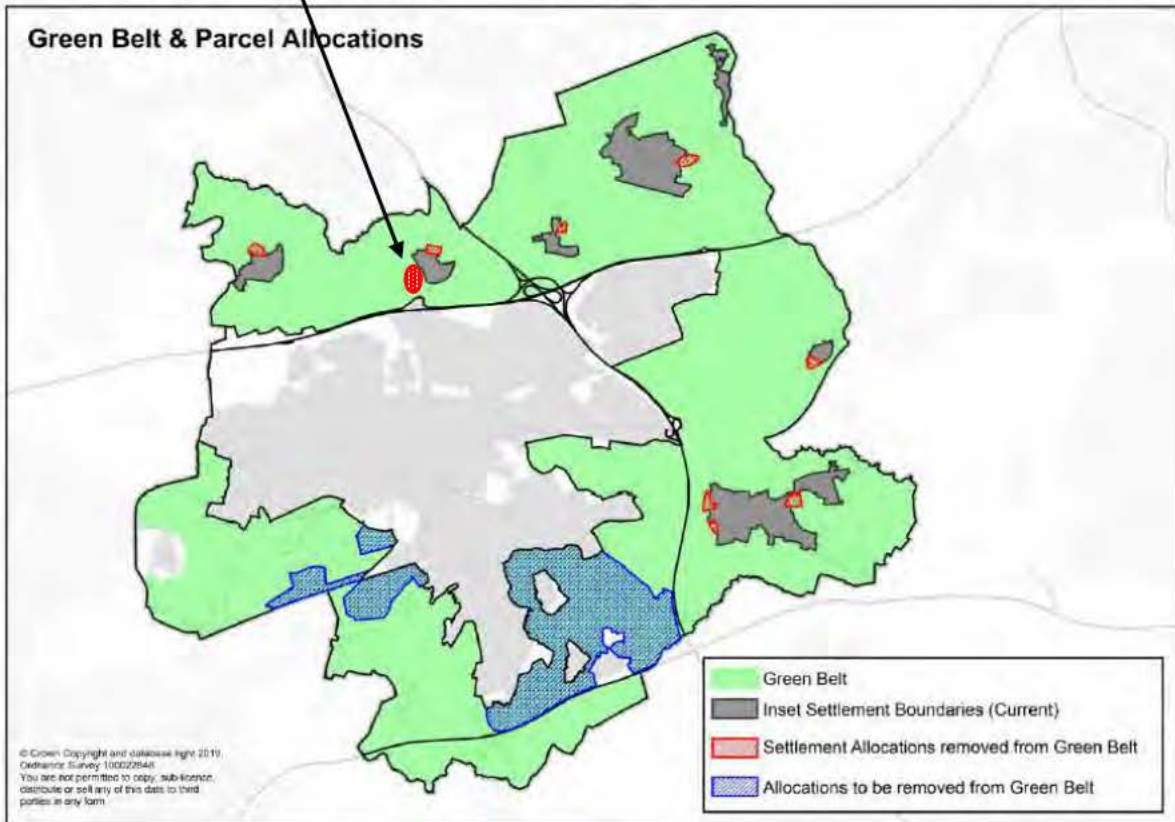
A Green Belt boundary that ignores a large housing estate and substantial hospital complex is not robust because every time a planning application is submitted for a residential building or a new hospital building, it could potentially undermine strict Green Belt policies which do not allow such development. The inconsistency created makes it difficult for the Plan to be effective and it therefore fails this test of soundness.

Modifications necessary in relation to the Policies Map

ASL suggest that the Plan's Green Belt boundary needs to be amended to reflect reality on the ground. We therefore suggest that the Green Belt boundary is redrawn so that all existing buildings at Winwick Park and Hollins Park Hospital are excluded from the Green Belt and instead are included within the Winwick village development boundary on the Policies Map.

These changes should also be reflected in Figure 6 on page 64 of the Submission Plan, as indicated approximately by the oval shown below:

Figure 6 – Amended Green Belt Boundaries



5. Policy GB1 Green Belt

Ainscough Strategic Land (ASL) has set out above that the Submission Plan makes insufficient provision for residential and employment needs over 2017-2037 and consequently additional land will need to be released from the Green Belt.

ASL is also very concerned that the proposed Green Belt boundaries will not endure beyond the end of the plan period, as required by the Framework, unless land is safeguarded to meet development needs 2037-2047.

We consider the Plan to be unsound because it is:

- i.) Not justified in relation to its evidence base;
- ii.) Not consistent with national policy in relation to long term housing needs;
- iii.) Not consistent with national policy in relation to long term employment needs.

These are explored in turn below.

i.) Not justified in relation to its evidence base

Land off Delph Lane, site R17/P2/127A, is well served by existing bus routes and adjoins a railway line, with potential to provide a new station stop, replicating the successful Warrington West railway station that has recently opened. Paragraph 138 of the Framework specifies that plans should give first consideration to land that is well served by public transport when reviewing Green Belt boundaries.

The Delph Lane site is assessed in the Green Belt Assessments as having a 'weak' overall contribution to the purposes of the Green Belt. The 2018 assessment is reproduced in **Appendix 3** to this representation for ease of reference.

In choosing which sites should be removed from the Green Belt, land with a weaker contribution to the purposes of the Green Belt should be removed in preference to land with a moderate or strong contribution. However the Submission Plan proposes release of land at Winwick (site OS9) that makes a 'moderate' contribution to the purposes of the Green Belt; land with a 'strong' overall contribution in parts of the Garden Suburb (for example, site R18/P2/125B); land with a 'moderate' overall contribution in other parts of the Garden Suburb (eg. R18/P2/125A & R18/P2/125C) and land with a 'moderate' contribution at the South West Urban Extension (sites R18/P2/031 & R18/P2/115).

It is not justified to release land that makes a higher contribution to the purposes of the Green Belt when land that makes a lesser contribution is available at Delph Lane, Winwick. On this basis, the Plan is not sound.

ii.) Not consistent with national policy in relation to long term housing needs

The Framework states in paragraph 136 that, “*Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.*” Paragraph 139 continues, “*When defining Green Belt boundaries, plans should:....c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.*”

Green Belt policies are “*strategic policies*” in a Plan. Consequently the calculation of longer-term development needs must be made using the standard method in accordance with paragraph 60 of the Framework, which states that, “*strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance*”.

Applying the standard method increases the number of homes required from 2037 to 2047 from 6,312 homes to 9,299 homes, as explained in more detail on pages 8 & 9 of this representation. When a 10% flexibility allowance is added, land equivalent to 10,229 dwellings is required to be identified.

The Plan’s approach to meet housing requirements over 2037 to 2047 is contained in Table 2 on page 36 of the plan, reproduced below for ease of reference.

Figure 7. WBC’s calculation of housing supply on page 36 of the Plan

Indicative Housing Supply 2037 to 2047	
Additional supply within Plan from flexibility	1,890
Illustrative Town Centre capacity	1,816
Small sites allowance	608
Garden Suburb delivery post 2037	2,289
Total indicative supply	6,603

The 1,890 additional supply from flexibility represents land that has *not* been developed over 2017 to 2037. If land has not come forward in the plan period, there is no reason to presume it will come forward in a later plan period. The 10% flexibility allowance of 1,890 dwellings should not be included as it amounts to double-counting of land required for the 2017 to 2037 plan period.

The illustrative Town Centre capacity of 1,816 dwellings is very high, given that the Local Plan assumes that there will be significant development in the Town Centre over the period to 2037. There is a finite amount of land in Warrington Town Centre and it is unlikely that the plan’s concentrated effort to deliver large amounts of housing over the plan period will leave sufficient additional land for a further 1,816 dwellings after the end of the plan period. We consider an allowance of no more than 500 dwellings can be justified.

Paragraph 4.1.28 suggests that additional land may also come forward as Green Belt land release through Neighbourhood Plans. Given the opposition of most Parish Councils to Green Belt land release, there is no evidence that this will occur and therefore no supply is likely from this source.

We consider that sufficient land can be identified for around 3,397 dwellings over 2037 to 2047 as shown below.

Figure 8. WBC's calculation of housing supply v our figures

Indicative Housing Supply 2037 to 2047		Our figures
Additional supply within Plan from flexibility	1,890	1,890
Illustrative Town Centre capacity	1,816	1,816 500
Small sites allowance	608	608
Garden Suburb delivery post 2037	2,289	2,289
Total indicative supply	6,603	6,603 3,397

In accordance with the standard method and as discussed in more detail on pages 8 – 9 of this representation, land supply sufficient for 10,229 dwellings should be available after the plan period. This leaves a shortfall of 6,832 dwellings that cannot be accommodated within the existing urban area. To provide long-term certainty over Green Belt boundaries beyond the plan period, it is therefore necessary to release land from the Green Belt to be safeguarded to meet future development needs of an estimated 6,832 dwellings.

Ainscough Strategic Land suggest that land at Winwick between the railway line and the A49 would be appropriate for safeguarding to meet future development needs.

iii.) Not consistent with national policy in relation to long term employment needs

As set out above, the Plan must be consistent with paragraph 136 of the Framework that, “Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.” Paragraph 139 continues, “When defining Green Belt boundaries, plans should:....c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.”

The EDNA (March 2019) estimates on page 25 that the further employment land requirement for 2037 to 2047 is 76.2 hectares.

In addition, plans should be sufficiently flexible to allow for unexpected changes. Brexit and HS2 are two recent examples of major change that was not expected 5 years ago. Adequate quantities of safeguarded land help provide essential flexibility to accommodate unforeseen future directions. We therefore consider that a large amount of employment land should be safeguarded to provide flexibility. An appropriate figure would be a total of 150 hectares.

In paragraph 5.1.16 the Plan states, *“The Council considers that there will still be a realistic supply of brownfield land beyond the Plan Period. This includes sites in the Town Centre and Fiddlers Ferry Power Station. Further supply may arise from Neighbourhood Plans making minor amendments to Green Belt boundaries.”*

We are unconvinced that employment land will come forward from Neighbourhood Plans as there is very little evidence that Neighbourhood Plan groups will seek to release Green Belt land for any purpose, least of all for employment land.

The Town Centre is identified in the plan for high density housing development and therefore, apart from offices, there is unlikely to be any significant employment land from this source.

In relation to Fiddlers Ferry, paragraph 4.2.28 reflects the EDNA evidence base¹ and states, *“There is not currently therefore sufficient certainty for the site be included within the Council’s developable employment land supply, but given the scale of the site, this will need to be kept under review.”* This is partly because, as stated in paragraph 4.2.27, *“The decommissioning and demolition of the existing Power Station will however take a number of years to complete. The existing ash processing activities at the site are also expected to continue beyond the coal power station’s life span, until the existing deposits are fully depleted, given the current market demand for ash.”*

The evidence base contains further details of why Fiddlers Ferry cannot be guaranteed to come forward in the plan period and, by extension, beyond the plan period:

- It is likely to continue be used for future power generation facilities – Paragraph 4.8 of the EDNA states: *“Given its existing National Grid, water, rail and road links, as well as the established skilled workforce, it would be a logical site for new power generation facilities”*. The operators of Fiddlers Ferry have also indicated to WBC that they are intending to maintain power generation on the site, as stated on pages 78 & 79 of the ‘Reg 18 Responding to Representations Report’ and as stated in paragraph 3.6 of the Urban Capacity Study.
- There is a market for the ash. The EDNA states in paragraph 4.9 that, *“The existing ash processing activities are also expected to continue beyond the Power Station’s Life span, until the deposits are fully depleted.”* This part of the site may therefore not be available within the necessary timespan.
- Fiddlers Ferry does not have the locational characteristics to offer an appropriate location for a strategic employment site as it is not well related to the highway network. There is no guarantee that it will be attractive to industrial or warehousing users.

¹ Economic Development Needs Assessment paragraph 4.10

- Substantial decontamination requirements undermine the speed at which Fiddlers Ferry may come forward in the future as a re-development site.

Furthermore, under the proposed Plan, Fiddlers Ferry will remain allocated as 'Green Belt' so any re-development proposals should not have a greater impact on the openness of the Green Belt than the existing development. This limits the density of any re-development of the site in future years.

The total area of Fiddlers Ferry is approximately 126 hectares in size. If we assume that 50% of the site will remain in power generation use, around 76 hectares might be available for other employment uses but of this the net developable area is likely to be 53 hectares (assuming 70% net developable), with great uncertainty as to whether this will come forward before 2047. It is insufficient and too uncertain in its deliverability to meet the identified long-term needs for employment development.

In light of the above, there is insufficient land identified in the Plan to satisfy the need to meet longer-term development needs in order to guarantee the longevity of the Green Belt boundaries. It is necessary to identify land to be 'safeguarded' for future development needs beyond the plan period in order that Warrington Borough it is not unduly constrained in meeting its future development needs.

Ainscough Strategic Land suggest that land at Winwick between the railway line and the A49 would be appropriate for safeguarding to meet future development needs.

Modifications necessary to Policy GB1

To make the Plan ‘sound’ we suggest the following changes, with proposed additions underlined and proposed deletions ~~crossed through~~:

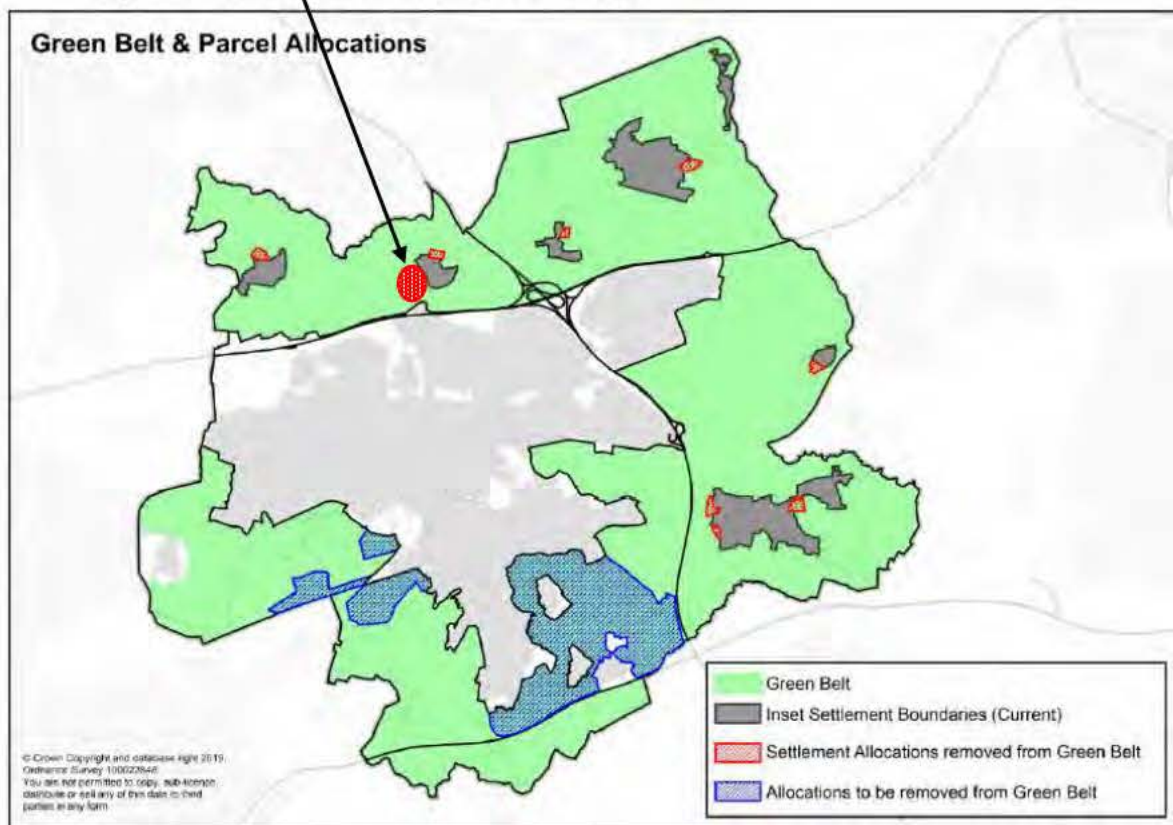
Policy GB1 - Green Belt

1. The Council will maintain the general extent of the Borough’s Green Belt, as defined on the Local Plan Policies Map, throughout the Plan Period and to at least 2047.

Land is safeguarded to meet development needs for a minimum of 6,832 dwellings over the period 2037-2047.

These changes should also be reflected in Figure 6 on page 64 of the Submission Plan, as indicated approximately by the oval shown below, and on the Policies Map:

Figure 6 – Amended Green Belt Boundaries



The modifications required to Table 2 under Policy DEV1 are listed on page 11 of this representation.

6. Policy OS9 Land north of Winwick

Allocation OS9 north of Winwick is unsound because it is not justified by the evidence base and is not the most sustainable option for residential development in this area being further from local employment and sustainable transport options than the Delph Lane site and having an unacceptable impact on the adjoining historic battlefield site and on groundwater source protection zones 1 & 2. Land at Delph Farm is highly suited to a mix of development including potential health care and residential and would be an ideal replacement or additional site for Winwick.

We consider the Plan to be unsound because it is:

- i.) Not Justified because it is contrary to the Green Belt Assessment
- ii.) Not Justified in relation to employment opportunities
- iii.) Not Justified in relation to sustainable travel
- iv.) Not Justified in relation to environmental impacts

These are explored in turn below.

j) Not justified because it is contrary to the Green Belt Assessment

The Submission Plan is not justified because it proposes to allocate sites that have a greater contribution to the purposes of the Green Belt than sites with a lesser contribution. The Green Belt Assessment of sites around Winwick is summarised below. A map showing the location of the sites and the relevant full Green Belt Assessments are reproduced in **Appendix 3** to this representation.

Site OS9 is assessed as having a '**moderate**' overall contribution to the purposes of the Green Belt. Land at Waterworks Lane also has a '**moderate**' overall contribution while land at Hollins Lane has a '**strong**' overall contribution to the purposes of the Green Belt. In contrast, the site at Delph Lane is assessed as having a '**weak**' contribution to the purposes of the Green Belt, making it much more suitable for removal from the Green Belt than the other sites.

Figure 9. Summary of Green Belt Assessment for sites around Winwick

Site Ref	Site Address	Purpose 1: check sprawl	Purpose 3: Safeguard countryside	Overall contribution
Policy OS9 SHLAA ref 2670	Golborne Road	No	Strong	Moderate
R18/P2/061	Waterworks Lane	No	Strong	Moderate
WI3, R18/064 & R18/P2/112	Hollins Lane	No	Strong	Strong
R18/P2/127A SHLAA ref 2590	Delph Lane	Weak	Moderate	Weak

All sites were assessed as making a 'weak' contribution to purpose 2: preventing neighbouring towns from merging. We agree with this assessment, as purpose 2 relates to the relationship between Warrington and other major towns, rather than the relationship between Warrington and its suburbs and satellite villages which are already an effective part of Warrington such as Winwick, Birchwood, Grappenhall, Appleton Thorn and Great Sankey amongst many others.

All sites had 'no' contribution to purpose 4: preserving the special character of historic towns and a 'moderate' contribution to purpose 5: assisting regeneration. We agree with this assessment.

The differences between the sites related to purpose 1: to check the unrestricted sprawl of large built-up areas and purpose 3: to assist in safeguarding the countryside from encroachment. All the Winwick sites **except** for the Delph Lane site were considered to have a 'strong' contribution in helping safeguard the countryside from encroachment.

The Delph Lane site was considered to make a 'weak' contribution to purpose 1 because it is considered to be part of the main urban area, whereas the other Winwick sites are not considered to adjoin the main urban area. The fact that it is considered part of the urban area has advantages in terms of promoting sustainable transport between the site and urban facilities and employment opportunities.

ii.) Not Justified in relation to employment opportunities

Site OS9 to the north of Winwick is justified in paragraph 10.13.1 of the Plan partly in relation to its ease of access to, "*employment opportunities at Omega/ Gemini/ Winwick Quay.*" However the site at Delph Lane is closer to employment opportunities and is also within walking distance of businesses at Winwick Quay.

The site at Delph Lane is bordered on its eastern side by generous amounts of public open space. There is a pedestrian walking route through the Delph Park estate, with Winwick primary school and the centre of the village are a 15 minute walk (1,000 metres) from the centre of the promoted site. The site is therefore highly sustainable in relation to village facilities as well as in its proximity to Warrington's urban area.

To reduce congestion it is important that the Plan actively seeks to bring housing and employment opportunities as close as possible to one another. The Delph Lane site achieves this far better than the alternative site at Winwick.

iii.) Not Justified in relation to sustainable travel

The Warrington to Newton-le-Willows railway line adjoins the western boundary of the Delph Lane site. This offers long term potential for a new railway stop, similar to the recent successful opening of a new

railway station at Great Sankey known as 'Warrington West'. The Delph Lane site could potentially lead to a new railway station on the Newton-le-Willows line known as 'Warrington North'.

There are bus stops opposite the B&Q store on the A49 only 600 metres from the centre of the Delph Lane site, with four bus services providing six buses an hour (bus nos 19, 22, 329 and 360). This provides an excellent level of public transport to the site.

The Sankey Valley cycle trail is only 750 metres from the centre of the Delph Lane site, offering a quick and safe cycle route to Warrington to the south and Newton-le-Willows to the north.

For bus, cycle and potentially rail transport options, the site at Delph Lane is substantially more sustainable than proposed site OS9 north of Winwick.

iv.) Not Justified in relation to environmental impacts

We consider the Plan's allocation of site OS9 be 'unsound' because it does not reflect key environmental constraints.

Site OS9 on Golborne Road is situated opposite a Registered Battlefield as shown on the map in **Appendix 2** to this representation. Development of the site will have a permanent and irreversible impact on the setting of this historic battlefield.

The proposed allocation OS9 adjoins a drinking water source and all the site lies within a Source Protection Zone, with approximately half the site lying within the Zone I Inner Protection Zone. This makes it more sensitive environmentally than other sites around Winwick.

The proposed allocation will also extend the built-up area into the countryside. The Green Belt Assessment noted that this parcel of land makes a 'strong contribution' to purpose 3: to assist in safeguarding the countryside from encroachment. It reported, "*The boundaries between the site and the countryside are of mixed durability. The western boundary consists of Golborne Road and the eastern boundary is Waterworks Lane, which are durable boundaries able to prevent encroachment beyond the site if the site were developed. The northern boundary however is not durable and is a field boundary that is not marked by a durable feature on the ground. The site is well connected to open countryside along three boundaries. The existing land use is open countryside that is in agricultural use. The site is flat with no built form, low levels vegetation and therefore long line views are present, thus the site supports a strong degree of openness. Overall, the site makes a strong contribution to protecting the countryside from encroachment due to its strong openness and non-durable boundary with the settlement.*"

Better sites are available. ASL's site on Delph Lane is well contained by the M62, Hollins Lane and the railway line. Release of this land from the Green Belt extends the recent development of Delph Park up to the clear barrier formed by the railway, which makes far more sense than extending

Winwick further northwards. It would not have as much impact on the wider open countryside as site OS9 and would lead to a more sustainable pattern of development that is better related to employment opportunities and facilities in Warrington.

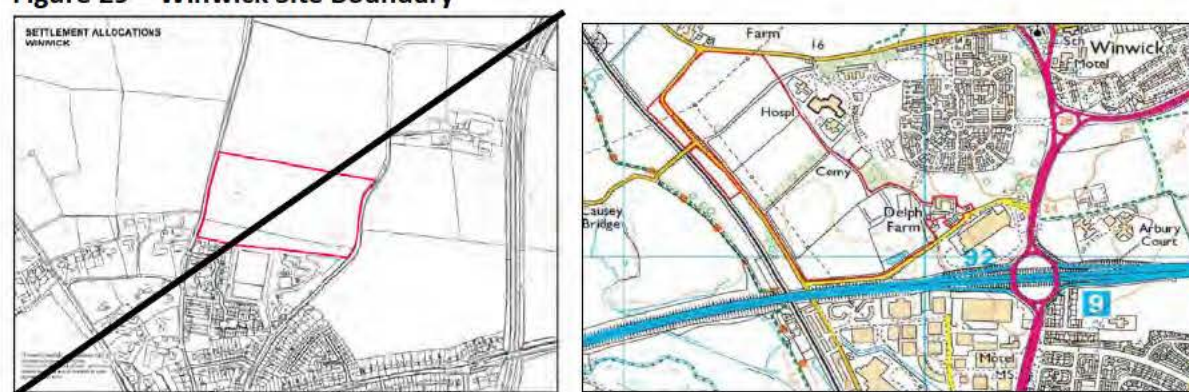
Modifications necessary to Policy OS9

To make the Plan 'sound' we suggest the following changes, with proposed additions underlined and proposed deletions ~~crossed through~~:

Policy OS9 – Land to the ~~north~~ south-west of Winwick

1. Land to the ~~north~~ south-west of Winwick (inset settlement) will be removed from the Green Belt and allocated for development for a minimum of ~~430~~ 630 homes.

Figure 29 – Winwick Site Boundary



7. Conclusions

Ainscough Strategic Land wishes to fully participate in the examination of the Local Plan due to its serious concerns about the Plan's evidence base and its effectiveness. We request participation in the following hearing sessions:

- Housing requirements
- Employment land requirements
- Green Belt
- Safeguarded Land
- Winwick

As a delivery partner with a strong reputation for assisting local planning authorities in achieving their development needs, ASL can make a significant contribution to the Local Plan process. We hope to work positively with Warrington Borough Council during the course of the Local Plan's examination to achieve a sound, modified Plan.



APPENDICES

Attached as separate documents

Appendix 1 Housing Trajectory from the Urban Capacity Assessment

Appendix 2 Registered Battlefield and Listed Buildings at Winwick

Appendix 3: Green Belt Assessments for Winwick Sites

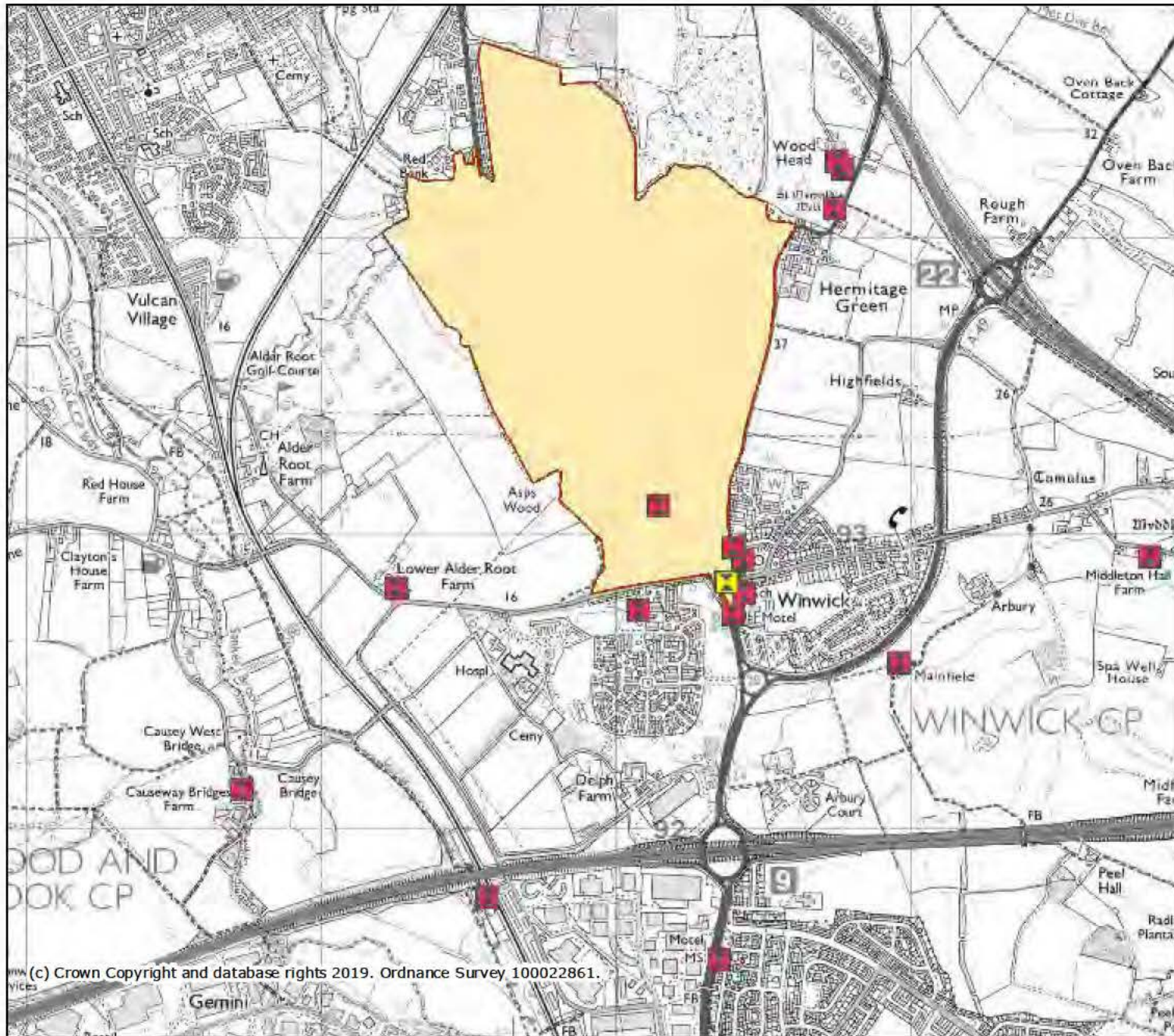
Appendix 4: Delph Lane promotion September 2017 (R18/P2/127A_4)

Housing Trajectory

	Years 1-5					Years 6-10					Years 11-15					Years 16-20					
	2017/18 Completions	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	
Town Centre																					
AECOM Masterplanning		0	0	415	323	517	277	130	241	213	555	477	216	113	43	0	215	199	73	0	4007
Wider Urban Area																					
SHLAA (Sites 0.25Ha and above)		251	164	421	546	231	282	310	399	387	217	152	110	185	157	111	110	100	0	0	4133
Waterfront																					
AECOM Masterplanning		0	110	205	187	90	220	220	220	220	220	255	233	110	90	55	55	52	0	0	2542
South West Extension																					
WWDA South Extension (GB Release)		0	0	0	0	0	116	117	117	117	116	116	117	117	116	116	116	117	117	116	1631
Garden Suburb																					
HCA Sites		45	204	225	180	180	96	0	0	0	0	0	0	0	0	0	0	0	0	0	930
AECOM Masterplanning (GB Release)		0	0	0	0	0	108	260	368	363	396	333	320	320	272	257	312	312	312	268	4201
Settlements																					
SHLAA (Sites 0.25Ha and above)		18	16	59	55	35	0	8	11	0	0	0	10	9	0	0	0	0	0	0	221
GB Release		0	0	0	0	176	360	311	206	32	0	0	0	0	0	0	0	0	0	0	1085
Other																					
SHLAA (Sites 0.25Ha and above)		12	21	15	0	0	4	0	18	1	0	2	9	11	0	0	0	0	0	0	93
Small Sites Allowance (Sites under 0.25Ha)																					
		76	76	76	76	76	76	76	76	76	76	76	76	76	76	76	76	76	76	76	1444
TOTAL	359	402	591	1416	1367	1305	1539	1432	1656	1409	1580	1411	1091	941	754	615	884	856	578	460	20287
Total	4135					7341					5777					3393					
Average	827					1468					1155					679					

Total including previous completions

20646



Legend

Listed Buildings (England)

- I
- II
- II*
- Registered Battlefields (England)

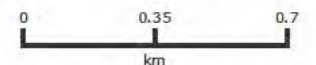
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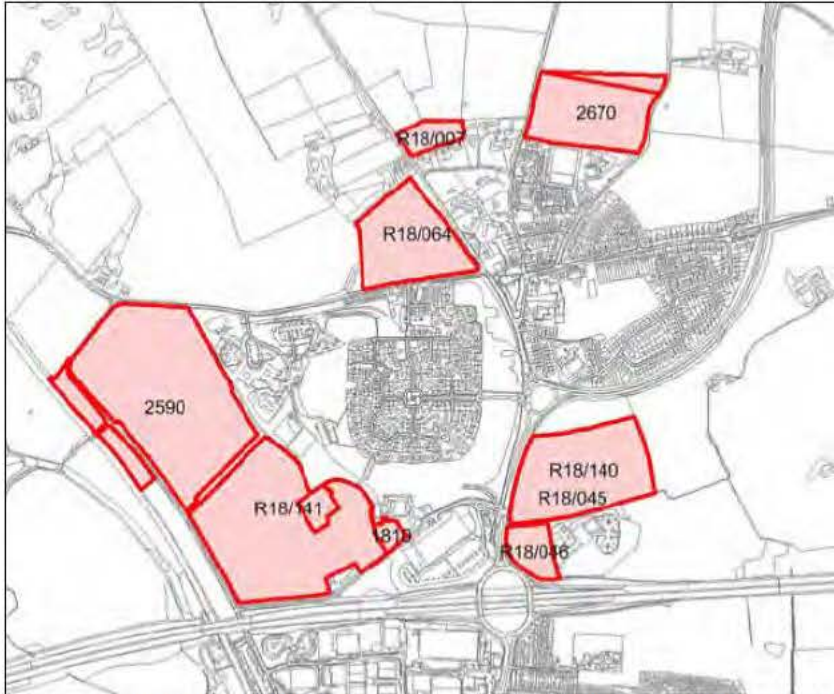


Map produced by MAGIC on 6 June, 2019.

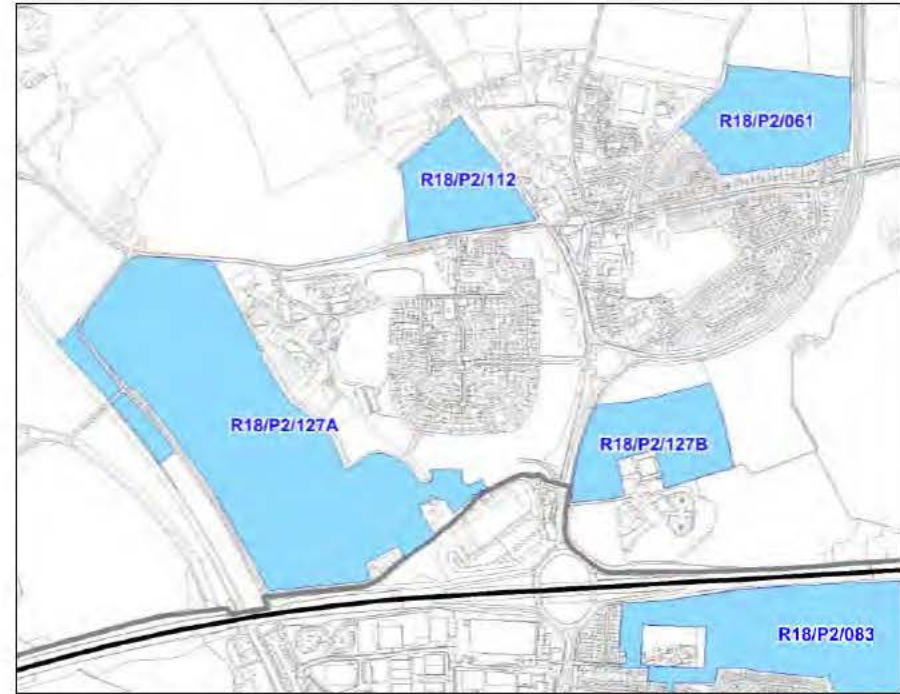
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APPENDIX 3: GREEN BELT ASSESSMENTS FOR WINWICK SITES

Maps of Green Belt Parcels in 2017 and 2018



Source: Green Belt Additional Sites Assessment Call for Sites/ SHLAA sites NW 2017



Source: Green Belt Assessments Map – Site Response Map 2018

The most recent number (shown in blue) is used except for site R18/P2/112 which is not included in the 2018 updates.

Proposed allocation OS9/ SHLAA site 2670 Highfield Farm, Golborne Road

Site	Purpose 1: to check the unrestricted sprawl of large built-up areas	Purpose 2: to prevent neighbouring towns merging into one another	Purpose 3: to assist in safeguarding the countryside from encroachment;	Purpose 4: to preserve the setting and special character of historic towns	Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Justification for Assessment	Overall Assessment
2670	No contribution: The site is not adjacent to the Warrington urban area and therefore does not contribute to this purpose	Weak contribution: The site forms a less essential gap between the Warrington urban area and Newton-le-Willows whereby development of the site would reduce the actual gap but not the perceived gap between the towns. Overall, the site makes a weak contribution to preventing towns from merging.	Strong contribution: The southern boundary between the site and the settlement is a hedge and tree line which is not durable and would not prevent encroachment in the long term. The boundaries between the site and the countryside are of mixed durability. The western boundary consists of Golborne Road and the eastern boundary is Waterworks Lane, which are durable boundaries able to prevent encroachment beyond the site if the site were developed. The northern boundary however is not durable and is a field boundary that is not marked by a durable feature on the ground. The site is well connected to open countryside along three boundaries. The existing land use is open countryside that is in agricultural use. The site is flat with no built form, low levels vegetation and therefore long line views are present, thus the site supports a strong degree of openness. Overall, the site makes a strong contribution to protecting the countryside from encroachment due to its strong openness and non-durable boundary with the settlement.	No contribution: The site is not adjacent to a historic town. The site does not cross an important viewpoint of the Parish Church.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose.	The site makes a strong contribution to one purpose, a moderate contribution to one, a weak contribution to two. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution as although it supports a strong degree of openness and the boundaries with the settlement are not durable, the boundaries with the countryside are predominantly durable apart from the northern boundary however the M6 is located further north. This is a very durable boundary. Thus any development would be contained and would therefore not threaten the openness and permanence of the Green Belt. The site makes a moderate contribution in assisting in urban regeneration.	Moderate contribution

Source: page 65 of Green Belt Additional Sites Assessment July 2017

Site at Delph Lane promoted by Ainscough Strategic Land R18/P2/127A

R18/P2/127A	Weak contribution: The M62 combined with Delph Lane forms a durable boundary between the site and the built up area. This is a permanent boundary that is durable enough to prevent sprawl into the site in the long term. The site is only connected to the urban area along this southern boundary. Overall the parcel makes a weak contribution to checking unrestricted sprawl.	Weak contribution: The site forms a less essential gap between Newton-le-Willows and the Warrington urban area whereby development of the site would slightly reduce the gap between the towns however would not result in them merging. Overall, the site makes a weak contribution to preventing towns from merging.	Moderate contribution: The boundary between the site and the settlement is the M62 and Delph Lane which is durable and would prevent encroachment. The site is connected to the countryside along the remaining boundaries. The eastern boundary is comprised of the edge of a hospital development and dense tree vegetation and an unnamed road, which are all less durable and would not prevent encroachment. However there is limited potential for encroachment to the east given the existing development within the Green Belt. The northern, western and southern boundaries are comprised of roads and a disused railway track including Hollins Lane and Watery Lane to the north, Mill Lane and the disused railway line (Sankey Valley Park Trail) to the west and Delph Lane to the south. These boundaries are durable and would prevent encroachment if the site were developed. The existing land use consists open countryside, some of which is in agricultural use. There are low levels of vegetation on the site apart from hedging which divides the site and the topography of the site generally slopes down gently to the south. The only built form on the site is Delph Farm in the south eastern corner of the site. The site supports no long line views and overall supports a strong- moderate degree of openness. Overall the site makes a moderate contribution to safeguarding from encroachment due to its strong- moderate degree of openness and durable boundaries to the north, south and west.	No contribution: The site is not adjacent to a historic town. The site does not cross an important viewpoint of the Parish Church.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose.	The site makes a moderate contribution to two purposes, a weak contribution to two purposes and no contribution to one purpose. In line with the methodology, the site has been judged to make a weak contribution. The site has mostly durable boundaries with the countryside and it supports a strong- moderate degree of openness. In addition, the site makes a weak contribution to preventing towns from merging and a weak contribution to the checking of unrestricted sprawl.	Weak contribution
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Source: page 10 of Green Belt Additional Sites Assessment – Main Urban Area May 2018

Site north of Hollins Lane WI3 also known as R18/064 and R18/P2/112

Site	Purpose 1: to check the unrestricted sprawl of large built-up areas	Purpose 2: to prevent neighbouring towns merging into one another	Purpose 3: to assist in safeguarding the countryside from encroachment;	Purpose 4: to preserve the setting and special character of historic towns	Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Justification for Assessment	Overall Assessment
WI3	No contribution: The parcel is not adjacent to the Warrington urban area and therefore does not contribute to this purpose	Weak contribution: The parcel forms a less essential gap between the Warrington urban area and Newton-le-Willows whereby development of the parcel would slightly reduce the actual gap but not the perceived gap between the towns. Overall, the parcel makes a weak contribution to preventing towns from merging.	Strong contribution: The boundary between the parcel and the settlement is a durable road boundary (A49) which would prevent encroachment into the parcel in the long term. The boundaries between the parcel and the countryside are predominantly non-durable. To the north and west is a non-durable boundary consisting of a track named 'Ladies Walk' which would not prevent encroachment beyond the parcel if the parcel were developed. However to the south is Hollins Lane which is a durable boundary that would prevent encroachment beyond the parcel if the parcel were developed. The existing land use is agricultural. The parcel is well connected to the countryside along three boundaries. There is no built form and minimal vegetation within the parcel and although the topography is slightly raised towards the middle of the parcel there are still long line views and thus the parcel supports a strong degree of openness. Overall, the parcel makes a strong contribution to protecting the countryside from encroachment.	No contribution: The parcel is not adjacent to a historic town. The parcel does not cross an important viewpoint of the Parish Church.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	The parcel makes a strong contribution to one purpose, a moderate contribution to one, a weak contribution to one, and no contribution to two. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The parcel has been judged to make a strong overall contribution as it supports a strong degree of openness and not all of the boundaries between the parcel and the countryside are durable and therefore the parcel has a strong role in preventing encroachment into the open countryside. The parcel therefore makes a strong contribution to fulfilling the fundamental aim of the Green Belt under paragraph 79 of the NPPF in protecting the openness of the Green Belt.	Strong contribution

Source: page H64 of Green Belt Assessment Arup Report October 2016

R18/064	Not re-assessed, same as site WI3 with boundary along inner tree line
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Source: page 68 of Green Belt Additional Sites Assessment July 2017

Land east of Waterworks Lane, Winwick R18/P2/061

R18/P2/061	No contribution: The site is not adjacent to the Warrington urban area and therefore does not contribute to this purpose	Weak contribution: The site forms a less essential gap between the Warrington urban area and Newton-le-Willows whereby development of the site would slightly reduce the actual gap between the towns but not the perceived gap. It would not result in the towns merging. In addition, the gap between the towns is already narrower in other places. Overall the site makes a weak contribution to preventing towns from merging.	Strong contribution: The site is connected to the settlement along the southern boundary and half of the western boundary which is comprised of the edge of residential development which are less durable and would not prevent encroachment into the site. The site is connected to the countryside on its eastern, western and northern boundaries. The eastern and western boundaries are comprised of Winwick Link Road to the east and Waterworks Lane to the west which are both durable and would prevent encroachment if the site were developed. The northern boundary is comprised of a hedge lined field boundary which is less durable and would not prevent encroachment if the site were developed. The existing land use consists of open countryside in agricultural use and there is no existing built form on the site. The site topography is generally flat and there is low levels of vegetation on the site. The site supports some long line views to the north and overall the site supports strong degree of openness. Overall the site makes a strong contribution to safeguarding from encroachment due to the less durable boundaries with the settlement and strong degree of openness.	No contribution: The site is not adjacent to a historic town. The site does not cross an important viewpoint of the Parish Church.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose.	The site makes a strong contribution to one purpose, a moderate contribution to one, a weak contribution to one and no contribution to two. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution as although it supports a strong degree of openness and the boundaries between the site and the settlement are non-durable, the site's boundaries with the countryside are predominantly durable and could contain development and prevent it from threatening the overall openness and permanence of the Green Belt.	Moderate contribution
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Source: page 7 of Green Belt Additional Sites Assessment – Settlements May 2018



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3. Sustainability
4. Suitability
5. Available and Deliverable
6. Considerations and Opportunities
7. Development Concept
8. Conclusions

Submitted September 2017



RTPI
mediation of space | making of place.





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1. Introduction

Overview

The 37.6ha site is promoted to the Warrington Local Plan Review by Berrys on behalf of the landowners, Mr D. Beattie and Mrs C. Leyland. The site is in close proximity to the strategic motorway network and forms a natural extension of the successful Winwick Quay business park.

This document draws together and updates previous submissions, extending the area that is being promoted for consideration in the Local Plan. It addresses the Council's identified need for a range of employment land to meet demand.

Previous submissions

33.9ha hectares of the site was originally submitted to the 2014 'Call for Sites' and was given SHLAA reference 2590. In light of the Arup Green Belt Assessment (2016) the southern 13.3 hectares was promoted in December 2016 for mixed uses and was given reference R18/140. The Council's subsequent Green Belt Assessment (July 2017) identified the northern half of the site as having a weak contribution to the purposes of the Green Belt. The landowner has therefore reverted to the larger site, together with adjoining land in his ownership, which is promoted for mixed uses in three phases.

Strategic Location

The site lies 550 metres from the A49 and junction 9 of the M62, providing an attractive location for businesses and helping protect the borough's prosperity and economic position in an increasingly competitive world.

The site and surroundings

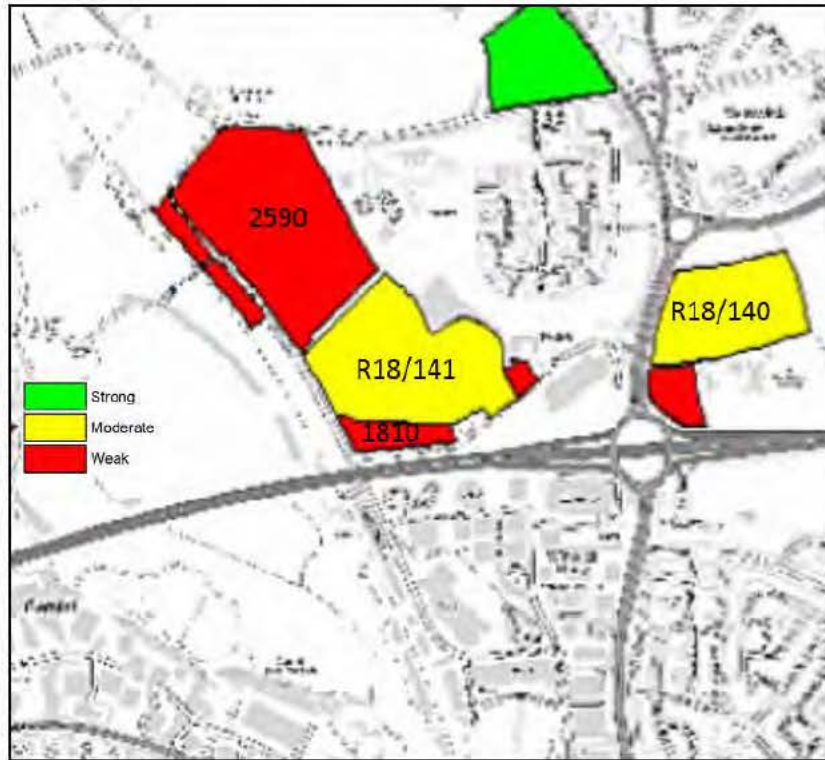
Mill Lane defines the western edge of the site, with the railway line beyond. Delph Lane is on the southern boundary, parallel to the M62. To the east of the site are a large B&Q retail unit, a livery yard and residential development. To the north is Hollins Park Hospital and Watery Lane.

Potential uses

The southern part of the site (phase 1) is promoted as a suitable extension to the Winwick Quay business park, suitable for office and industrial development (use classes B1, B2 & B8) and available for immediate development.

The central part of the site (phase 2) and northern edges (phase 3) are suitable for employment, health-related and residential uses and will help Warrington Borough Council meet its long-term development needs.

Council's Green Belt Extra Assessments (July 2017)



Arup's Green Belt Assessment (2016)



2. Green Belt Review

Green Belt parcels

The *Green Belt Assessment* (2016) considered parcel WR5 to have a ‘moderate’ contribution to the Green Belt. The Arup Study incorrectly consider the parcel to have “long line views” but this is not the case, due to mature trees that fringe the site on its northern and western boundaries and which make it impossible to see the wider countryside from the parcel.

The Council’s *Green Belt Extra Assessments* (July 2017) assessed the residual area of SHLAA site 2590 as having a ‘**weak**’ contribution to the purposes of the Green Belt, with durable boundaries. This is the more accurate assessment.

The Council’s assessment for site 2590 states:

“In line with the methodology, the site has been judged to make a weak overall contribution. The site makes a moderate contribution to safeguarding the countryside from encroachment as although it supports a strong-moderate degree of openness, the boundaries between the site and the settlement are durable, and the boundaries between the site and the countryside are also predominately durable. The site makes a weak contribution to checking unrestricted sprawl and from preventing towns from merging. The site does not contribute to preserving the setting of historic towns.”

Safeguarded land

The National Planning Policy Framework requires any review of Green Belt boundaries to have, “*regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*” (NPPF para 84). Consequently this once-in-a-generation Green Belt review needs to consider the release of enough Green Belt land to cater for two plan periods, as neighbouring local planning authorities have done, in order to be consistent with the Framework.

Decisions on Green Belt release

Contribution to the purposes of the Green Belt can only be part of the decision-making process. Equally important are sustainability considerations, as required by the National Planning Policy Framework which states, “*When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.*” (NPPF 84)

The site’s contribution to a sustainable pattern of development is therefore a crucial element of the decision in the Local Plan regarding its suitability for removal from the Green Belt.



3. Sustainability

The site scores relatively well against the councils sustainability criteria, key aspects of which are highlighted below and summaries by colour.

Economy and Regeneration ■

Development of the site for employment-related land uses will benefit the local economy and provide a natural extension to the successful Winwick Quay employment area to enable local companies to expand.

Health and Wellbeing ■

Landscaping and new tree planting around the site provides for new pedestrian routes and a liner park.

Accessibility ■

The site is within 500 meters of the A49 which leads directly to junction 9 of the M62. there is a frequent bus service on the A49 with 6 buses an hour, namely Arriva bus 329 to St. Helens twice hourly; and Network Warrington bus No. 19 every hour; and Network Warrington bus No. 22 every hour.

Housing ■

The site is being promoted for employment uses, but we are open to discussion on any other uses that the Council consider appropriate, including housing.

Natural Resources ■

Any development will be designed to ensure an overall enhancement of the natural environment. The majority of the site is over 100 metres from an AQMA and 0.05% of the site overlaps with contaminated land, which can be remediated. There is some grade 2 agricultural land. The site does not lie within a groundwater source protection zone and does not overlap with flood zones 2 or 3.

Built and Natural Heritage ■

The character of the site includes mature tree belts, which will be retained and enhanced by any development. There is only one listed building, the Lower Alder Root Farmhouse which lies to the far north-west of the site, but otherwise the site does not affect any heritage designations.

Biodiversity and Geodiversity ■

The site will not impact on any national designations, with the site over 3km from the nearest SSSI and over 6km from the nearest SAC/ SPA. There are TPOs on the site boundaries, but these would be respected and enhanced as part of a comprehensive landscaping scheme.

Climate change and resource use ■

The site is predominantly greenfield, however the southern half would not involve the loss of any agricultural land because it is in equestrian use.



4. Suitability

This site is particularly suitable for commercial development due to its proximity to Winwick Quay and Junction 9 of the M62 & the A49.

This site is very well served by existing infrastructure. It is relatively flat and well screened on its northern and western sides by mature hedgerows. Adjoining uses include a range of commercial and health-related businesses.

This site scores very highly against the criteria in the Council's *Economic Development Needs Assessment*, particularly against the 5 'market led' indicators:

EDNA site suitability	Score	Market-led
Road proximity – strategic: site adjacent to motorway	10	10
Road proximity – local: site within 1km of the A49	10	10
Prominence: site adjacent to, and visible from, M62	10	10
Public transport: site within 0l.5km of a bus route	10	
Planning status: available, subject to planning	1	
Services availability: available with no abnormal costs	7	
Constraints: electricity pylons on site	9	
Environmental setting: good quality/ greenfield location	10	10
Flexibility: site shape and ability to sub-divide	10	10
Availability: available to develop within 1-5 years	<u>6</u>	
Total	<u>83</u>	<u>50</u>

Compared to the sites included in the EDNA's realistic supply (table 23, reproduced below), this site scores more highly than any other competing site.

EDNA Table 23 – Employment Sites Scoring (Realistic Supply)

Site Ref	Name	Revised Site, ha	Score max 100	Market-led sub-total
Omega 7C	Plot 7C Omega South	7.65	78	33
Omega 1 4(L)	Omega North – Parcel 4(L)	2.06	76	40
381	Plots & Quadrant, Birchwood Park	11.66	75	37
336	Land off Bewsey Road	0.15	74	26
367	The Quadrant (S), Birchwood Park	1.87	74	32
-	Omega Phases 1 and 2 Remainder	26.27	71	46
357	Phase 1 Remainder – Lingley Mere	2.35	70	36
356	Gemini 8 Retail Park, Westbrook	5.21	66	33
360	Land at Stanley Street	0.05	64	32
15 A(c)	Phase 3 – Lingley Mere	3.62	64	38
Omega Zone 7	Omega South – Zone 7	33.70	63	35
382	Benson Road, Birchwood	0.24	59	20
36c	Gemini 16, Westbrook	2.20	52	29
309	Forrest Way Business Park	7.50	47	22
R18/141	Land west of Delph Farm, Winwick	20.76	83	50



5. Available and Deliverable

Availability for commercial development

The site is in one ownership, held by Mr Beattie and his mother Carole Walsh. Their intention is to bring forward development on the site as quickly as possible.

Berrys are a property consultancy company with six offices across the UK providing a wide range of services, including 9 chartered planners. If allocated in the Local Plan the site will be immediately marketed for development. Berrys' development agency team are very experienced at bringing land to the market and in structuring suitable land deals with a wide range of developers and end users. We are also able to promote leasehold development, with Berrys' commercial agency team having wide experience of managing commercial buildings on behalf of landowners.

Freehold and leasehold

The site would be marketed as available both for freehold and leasehold development.

Timescales

The site is readily developable with no land ownership problems. The timescales for development are:

- Phase 1—years 1-5
- Phase 2—years 6-10
- Phase 3—years 11-15

Variety of sites

The Local Plan needs a variety and choice of sites of differing sizes, locations and characteristics. The Council's *Economic Development Needs Assessment* (October 2016) recommended that:

“The Borough should also have a buffer to reflect a choice of sites by size, quality and location and to provide a continuum of supply beyond the end of the 2037 period. This also makes some allowance for the loss of further employment land to non B-Class uses over the period to 2037.” (EDNA paragraph 10.41)

This site will assist Warrington Borough Council in fulfilling the Core planning principles set out in the National Planning Policy Framework, and in particular:

- *“To identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals... taking account of the needs of the residential and business communities;*
- *Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.”* (NPPF para 17)

This site is well served by infrastructure and ready to meet development needs.

Junction of Mill Lane and Delph Lane



The Sankey Valley Trail between Warrington & Newton-le-Willows



Bus stop on the nearby A49



View of the site from the railway bridge on the Old Alder Lane 15

6. Opportunities and Considerations

The Council's own Site Assessments found few constraints:

Constraints	Council's assessment		Good/ bad
	Southern parcel R18/141	incl. northern parcel 2590	
Floodzone 2 & 3:	No	No	✓
Green Belt:	Yes	Yes	✗
TPO Issues:	TPOs adj. north	TPOs	✗
Nature Designations:	None	None	✓
Conservation Areas:	No	No	✓
Statutory Listed Buildings:	No	No	✓
Locally Listed Buildings:	No	No	✓
Archaeological Assessment:	No	No	✓
Scheduled Ancient Monuments:	No	No	✓
Strategic Road Network Ac-	None	No	✓
Local Highway Access:	Delph Lane / Mill Lane	Watery Lane / Hollins Lane	✓
Access comments:	Access from Delph Lane (S) and Mill Lane (W)	Existing access onto both local highways	✓
Neighbouring Uses:	Retail /Farm/ Medical	Agricultural	✓
Air Quality Management Areas:	No	No	✓
Agricultural Land Classification:	equestrian	2	✗
Potentially Contaminated Land:	Yes	No	✓
Hazardous Installation Zone:	No	No	✓
Public Rights of Way:	No	No	✓
Green Belt Parcel (WR6) Result	Weak	Weak	✓

Considerations & Opportunities

Electricity Pylons – the site is crossed by high voltage pylons. This will form part of a linear landscaped zone providing a pedestrian route parallel to Mill Lane.

Surface water – There is some ponding on the site, which will be managed through the creation of attenuation ponds as part of an attractive landscaping scheme.

Current grazing uses – the southern part of the site is in equestrian use and its development will therefore not involve the loss of any productive agricultural land.

Biodiversity – ecological enhancements will include a balancing pond and new planting with suitable native species to encourage an overall increase in the biodiversity of the site as a benefit of development.

Tree-lined eastern corridor - There are no formal public rights of way but a private unsurfaced road along the eastern edge of the site is regularly used by horses and pedestrians. This existing tree-lined corridor through the site will be retained.

Tree preservation orders – All existing trees will be retained and development kept at a distance from their root protection zones.

Landscape - The site is well contained in the landscape, being surrounded by trees on all sides.

Cycling routes - The Sankey Valley Trail provides an off-road cycle link to Warrington and Newton-le-Willows.



Phase 3

Phase 2

Phase 1

Lake

Winwick Park

Winwick

KEY

- Phase / Land Border - - -
- Landscaping Buffer —
- Potential Access Points ➔
- Pylons •••••

M62

9

9

M62

7. Development concept

This 37.6 hectare site is easily developable, with no over-riding constraints.

The proposed development of the site includes the following:

Site characteristics	Response
Mill Lane access & Winwick Quay extension	An access point off Mill Lane will be provided for traffic from this direction
Delph Lane Access	A number of options exist, either using the existing access to Delph Farm or widening Mill Lane beyond the B&Q delivery yard.
Electricity Pylons	Utilise the buffer zone beneath the pylons for utilities, landscaping and car parking
Surface Water ponding	Attenuation ponds will provide an attractive water feature and new wildlife habitat
Tree Preservation Orders at Co-ney Grove Woods	No development within the root protection zones of any trees.
Large site subdivided by tree belt	The mature trees form a natural boundary between phases 1 & 2
Delph Farm Livery and Menage	There is potential to re-use existing buildings on this site
Local residential development	The landscaping scheme will provide suitable buffers and attractive areas of public open space to benefit all.

Land uses

The site is promoted for a number of uses, including office, commercial, industrial (B1, B2, B8 uses), sui generis and health related developments.

The land owner is prepared to be flexible if the Council also wish to consider other uses including residential.

Environmental Enhancements

Development will be accompanied by provision of attractive landscaping including attenuation ponds and the retention of all existing trees, enhancing the environment for people and wildlife alike.

Infrastructure

The site is well served by utilities and by transport links, including frequent public transport. Development will make efficient use of Warrington's existing assets.

Development on this site reduces the amount of employment land required elsewhere, enabling the Council to maximise infrastructure contributions from residential development with higher values in other locations.



8. Conclusions

Strategic Location

This site provides a natural extension to the successful Winwick Quay employment area, making it attractive to a range of commercial users and highly deliverable.

The site has excellent access to the strategic road network, being within 500 metres of the A49 and Junction 9 of the M62. Developable land in close proximity to motorway junctions is in relatively short supply and offers competitive advantages that the Council cannot afford to ignore.

The site makes only a weak overall contribution to the purposes of the Green Belt.

Suitable, Available & Deliverable

The site is highly attractive to the market and has no significant site constraints. It is in one family's ownership and can be delivered within 5 years. The Council can therefore be certain that it will come forward to produce high quality development accompanied by environmental enhancements.

Benefits

This 37.6 hectare site helps the Council provide a variety of sites and locations suitable to accommodate the growth of Warrington's economy and services into the future. It can help the Council meet its development needs for a range of uses, including B1, B2, B8, sui generis and health-related developments in a sustainable location that is already well served by infrastructure. In summary, this site offers:

- A natural extension to Winwick Quay;
- Excellent accessibility to the strategic road network;
- Close to frequent public transport;
- Well served by existing infrastructure;
- Willing landowners;
- High attractiveness to the market using EDNA criteria;
- Opportunities to create attractive public open spaces.

The landowners welcome on-going engagement with the Council, and will provide any further information requested as the Local Plan Review progresses.

