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17 June 2019

Dear Sir/Madam

Proposed Submission Version Local Plan – Draft Policies DC5 and MD4. Land at Peel Hall, Warrington

Ove Arup and Partners (Arup) is instructed by Homes England to submit formal representations in respect of the Warrington Proposed Submission Version Local Plan, dated March 2019, specifically in relation to their land holding at Peel Hall (Mill Lane Playing Fields). Homes England also owns additional land elsewhere within the Borough and a separate letter has been submitted to Warrington Borough Council (WBC) in relation to their landholding at South Warrington.

This response relates to the following Proposed Submission Version Local Plan policy sub-numbers and paragraphs:

- MD4.1 (1);
- MD4.3 (27);
- Paragraph 10.4.3;
- DC5 (2); and,
- DC5 (7).

Homes England welcomes the opportunity to respond to the Proposed Submission Version Local Plan in its capacity as partial land owner in respect of the site allocated as Land at Peel Hall under draft Policy MD4.

Homes England Response

Homes England is the government's housing accelerator. It has the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, Homes England is making possible the new homes England needs, helping to improve neighbourhoods and grow communities.

Policy MD4: Land at Peel Hall - General

Homes England is supportive of the allocation of its land under draft **Policy MD4** of the Proposed Submission Version Local Plan. Homes England owns 4.6ha of land within the

allocation off Blackbrook Avenue (Land known as Mill Lane Playing Fields), and can confirm that this land is wholly within the control of Homes England and is available for residential development. The relevant parcel of land is identified on the plan enclosed.

Draft Policy MD4: Land at Peel Hall – playing field re-provision

Draft Policy MD4 provides detailed requirements related to land use and infrastructure, delivery / phasing and site-specific requirements, including type of homes, community facilities, transport and accessibility, open space and recreation, natural environment and protection and utilities.

In relation to existing playing fields at Mill Lane, draft Policy MD 4.1 (1.) states that:

“Land comprising approximately 69 hectares at Peel Hall will be allocated to deliver a new sustainable community of around 1200 new homes, supported by the following range of infrastructure:

m. The provision new sports pitches and ancillary changing facilities, including the relocation of existing pitches at Mill Lane.”

The Open Space and Recreation section of draft Policy MD4.3 also states as follows:

“27. In accordance with the Council’s open space standards the overall provision of open space for the new residential development should include as a minimum:

(c.) Provision of additional 4.4ha of playing pitches and ancillary facilities in additional to the replacement of the existing pitches from Mill Lane.”

Paragraph 10.4.3 in the pretext to the draft Policy for Land at Peel Hall advises that:

“The new community will be supported by:

- *A range of community facilities within a Local Centre, including a new primary school, residential care home and local shops;*
- *Extensive highways and transport improvements;*
- *Extensive open space and recreation provision, including relocated and improved playing fields and associated facilities.”*

From the above, it is clear that any development of the site would require the replacement / relocation of the existing pitches at Mill Lane.

Homes England recognises the importance of homes having access to a network of high quality open spaces and, supports the requirement for the provision of replacement sports pitches to serve the new community.

Policies Map / Policy DC5 – Mill Lane playing fields allocated as open space

In addition to the Homes England site being allocated as part of the Peel Hall site under draft Policy MD4, it is also identified on the policies map as Open Space, Outdoor Sports and Recreation provision under policy DC5.

Policy DC5 (2.) of the Proposed Submission Version Local Plan states that

‘The Council will encourage partnership working to ensure that sufficient quantity and quality of, and convenient access to open space, sport and recreation provision is secured through the following measures:

a. Protecting existing sites;

Policy DC5 (7.) also sets out a presumption against the loss of existing open space. This states that:

“The Council will not permit development likely to result in an unacceptable loss of existing open space, sport or recreation facilities for non-recreation purposes unless it can be demonstrated:

- a. That the development is ancillary to the recreation use and does not reduce the overall recreation function of the site;*
- b. That replacement recreation provision of at least the same quantity, quality and accessibility to its catchment population, community benefit and management level is made in a suitable location; or*
- c. that the site/facility is surplus to recreational requirements and is not capable of helping to meet any of Warrington’s recreation standards.”*

We would query the allocation of the Homes England land for protection as Open Space, Outdoor Sports and Recreation (draft Policy DC5) given its allocation as part of the Peel Hall site under draft Policy MD4.

The allocation of the site under draft Policy DC5 does not reflect the principle of relocating the existing playing pitches, which is already accepted and secured under draft Policy MD4.

Draft Policy MD4 would ensure that the playing fields would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location within the site, in accordance with Paragraph 97 of the National Planning Policy Framework (NPPF). Development proposals on the site would be considered against draft Policy MD4, which would require mitigation for any loss and it is accordingly not considered necessary to also allocate the site as future open space under draft Policy DC5. Through the drafting of MD4, the Council has secured the requirements of paragraph 97 of the NPPF in so far as replacement provision will be appropriately planned for.

Summary

In summary, Homes England is supportive of the allocation of its land under draft Policy MD4 of the Proposed Submission Version Local Plan. Homes England is also supportive of the requirement to replace pitches lost through the development of the Mill Lane Playing Fields, the requirement to mitigate for the loss of which is captured within draft Policy MD4 and the accompanying Illustrative Concept Plan for Peel Hall in Figure 20.

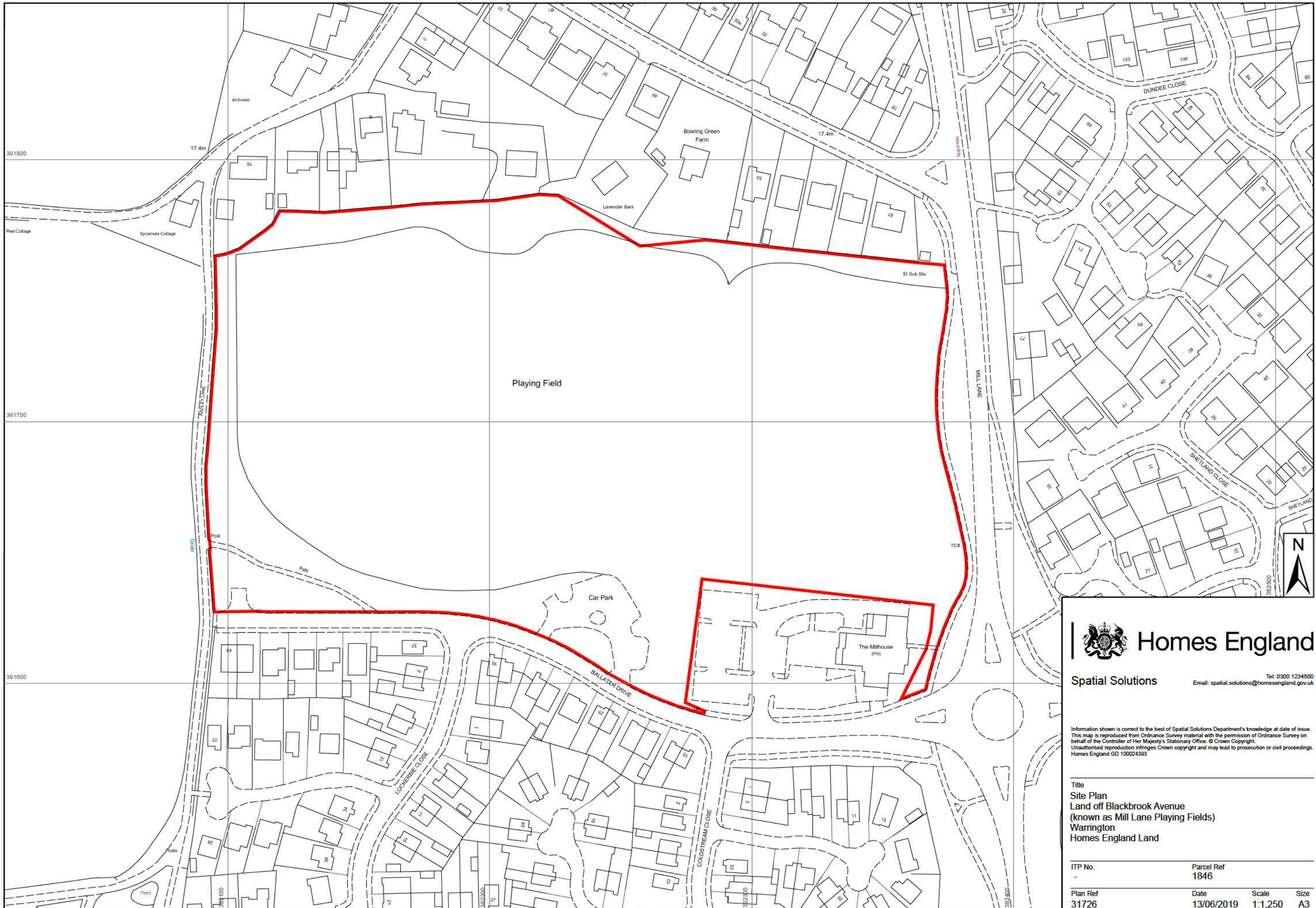
Given the above, Homes England respectfully request that the policies map is modified to remove the open space allocation under draft Policy DC5. This land should instead remain identified as part of draft Policy MD4 only, as this will ensure the provision of any replacement playing pitches as part of the future development of the site.

We would be happy to discuss this further. Homes England also wishes to please be updated on subsequent iterations of the plan and Examination process.

Yours faithfully



Jane Healey Brown
Associate Director



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Title
Site Plan
Land off Blackbrook Avenue
(known as Mill Lane Playing Fields)
Warrington
Homes England Land

ITP No.	Parcel Ref		
-	1846		
Plan Ref	Date	Scale	Size
31726	13/06/2019	1:1,250	A3