

Local Plan, Planning Policy and Programmes
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Ref: 0200/JP

WARRINGTON LOCAL PLAN 2017-2037

**The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)
(Regulation 19) Representations Procedure**

Draft Policy MD2

Land to the North of Broad Lane, Grappenhall, Village C, Warrington Garden Suburb

Dear Sir / Madam

Introduction

Nexus Planning have been instructed to act on behalf of Hollins Strategic Land (HSL) to confirm their support for the proposed Warrington Garden Suburb (WGS), allocated under draft Policy MD2 of the emerging Warrington Local Plan (2017-2037). HSL controls some 63.3 acres of land known as Broad Lane. The land is being promoted for residential led development to form part of proposed Village C.

HSL is committed to assisting in the delivery of the WGS, in particular the early delivery of Village C and its infrastructure needs. HSL has submitted a joint supportive letter of support which confirms landowners are working collaboratively to deliver the WGS.

The extent of the land controlled by HSL is outlined in Appendix 1. HSL's focused interest is on Village C and the early delivery of core infrastructure elements to support Parcels C1, C2 and C3

Comments on Draft Policy MD2 'Warrington Garden Suburb'

HSL supports the allocation of WGS under draft Policy MD2 for development and therefore the proposed removal of land at Broad Lane from the Green Belt. The Garden Suburb can deliver the necessary infrastructure to support its development and contribute to the wider sustainable development of Warrington as a whole.

Proposed Submission Warrington Local Plan – Policy MD2 Representation continued

Specifically, HSL supports the benefits that Village C can bring such as a strategic link road to the A50 and access to the proposed Country Park.

HSL concur with Warrington Borough Council that very special circumstances exist to justify release of the site at Broad Lane from the Green Belt and that there is a significant and pressing need to allocate land to meet housing needs in this plan period and indeed beyond. HSL agree that Green Belt release can be facilitated without compromising the overall strategic importance of Warrington's Green Belt. It is considered that impacts on the character of surrounding areas, ecology, heritage and surrounding infrastructure can indeed be mitigated by the opportunities presented through the size of the allocation, the provision of infrastructure and appropriate master-planning.

The site's inclusion as a proposed allocation demonstrates that the Council recognises it as a suitable, available, achievable and deliverable site for housing, and an appropriate location to accommodate some of the growth required over the plan period. The Council is right to recognise this site as an important opportunity within the Borough to bring forward a significant proportion of the housing requirement as part of the wider WGS proposals.

HSL is supportive of Policy MD2. However, to ensure the policy is effective it needs to focus on the core principles of the WGS and its timely delivery. There is risk that the currently drafted text is overly prescriptive and too detailed particularly given the fact that matters such as infrastructure, masterplanning, delivery, mitigation and phasing requirements will be set out within a Development Framework Supplementary Planning Document (SPD). In this regard HSL consider draft Policy MD2 could be made much more concise and doing so would ensure it meets the tests of soundness. The subsequent SPD will provide the opportunity to provide detail on key issues such as place making, infrastructure delivery and housing supply across the WGS.

In accordance with paragraph 72 of the Framework, there are a number of significant benefits associated with early delivery of Village C and its related infrastructure:

- Provision of part of the strategic link road between the A50 and Broad Lane could be delivered without any reliance on grant funding;
- Creation of a critical mass around the neighbourhood centre, therefore supporting key community infrastructure such as schools, shops, community facilities and public transport improvements;
- Initial phases of the proposed Country Park would significantly improve residential amenity and provide access to open space for future residents of the Garden Suburb allocation; and
- Assist the Council in significantly boosting the supply of housing and meeting Local Plan delivery requirements

Therefore, whilst HSL support the draft allocation, it is considered that a number of amendments are required in order to improve the effectiveness and therefore soundness of draft Policy MD2.

MDA 2.2 Delivery and Phasing

Early delivery of a link road from the A50 to Broad Lane is fundamental in order to meet delivery rates across the WGS area as per the proposed housing trajectory. HSL and the adjoining landowners are working collaboratively to deliver the link road between the A50 and Broad Lane thereby connecting the retail core and country park to the wider road network.

It is considered that this element of the link road will not have to rely on grant funding or compulsory purchase, but can be delivered by individual planning applications and associated Section 106 agreements. This is an appropriate mechanism to secure the strategic link road.

The Policy (Para 14) is too restrictive and at risk of being found unsound. It currently restricts residential phases (other than that already approved) until funding and a programme of works has been agreed for the strategic

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link road. Reference to other delivery mechanisms needs to be made such as S106 and CIL payments to support core infrastructure.

It is considered that there is an imperative to allow development to commence from the A50 at the early stages of the plan in addition to the A49 for the following reasons:

- 1) Development of a minimum of 5300 dwellings over a 17 year period requires an average annual build rate of over 300 per year. Developer experience for this scale of development suggests that 8 to 10 outlets would be required to achieve this level of build rate.
- 2) To accommodate up to 10 outlets will require access from the public highway from several directions both east and west of the retail core. An access point from the A50 will allow for additional outlets to be established and assist the delivery rate across the WGS
- 3) The level of infrastructure envisaged within MD2 is significant but not insurmountable. It is anticipated to be required to be in place at an early stage in the overall development in order for public transport patterns to be established, cycle and pedestrian linkage to become available. This approach would help to reduce the risk of use of the private car being established as the only perceived travel mode available from the overall site.
- 4) Allowing development to take place from the A50 as well as the A49 would assist in delivering an early phase of the strategic link from the eastern extent of the WGS. HSL is working in partnership with other committed landowners/developers to delivery Village C as part of a phased delivery strategy via S106 agreements and future planning applications in accordance with any future SPD.
- 5) Allowing development from both the A49 and A50 would also be anticipated to increase the certainty for the delivery of the required number of houses within the plan period up to 2037.

Ransom Positions

To ensure the effectiveness of Policy MD2, it must include appropriate wording so as not to preclude the delivery of residential land parcels and strategic infrastructure. The following phrase should be included within the wording of the Policy MD2:

The Garden Suburb will be supported by a wide range of infrastructure and delivered in a coherent and comprehensive manner to ensure one development proposal does not prejudice another.

Including the above text as part of Policy MD2 rather than in an SPD would provide a much stronger basis for avoiding delivery issues and help to ensure core infrastructure is delivered, early in the plan period.

Delivery Rates

Given the large area of land which the Garden Suburb allocation covers, it is considered the market absorption rate can be much higher than currently anticipated by the Council. There are a number of sites spread across different market locations to the south of Warrington that would allow for a wide range of developer partners, likely to include national house builders, housing associations, small regional house builders and self-build. There is potential for 10 or so house builders on-site all with the aim of delivering homes in the WGS in accordance with an overarching masterplan and infrastructure delivery plan. This can assist the Framework's key objective of significantly boosting the supply of homes (paragraph 59) and assist the Council in terms of meeting the requirement to maintain a five year housing land supply and have a trajectory of deliverable sites over the plan period (paragraph 73).

HSL reserves the right to make further detailed comments on delivery rates and the housing trajectory as the plan progresses.

Housing Numbers

It should be noted that draft Policy MD2 refers to the number of homes that will be delivered in the Garden Suburb area during the Local Plan period as ‘approximately’ 5,100 homes. The National Planning Policy Framework (The Framework) is clear within paragraph 11 under plan making that “*strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses*”. The Framework is clear that housing requirements in Local Plans should be considered as a ‘minimum’.

This approach would ensure the policy is positive and the plan is flexible so that it includes the necessary contingency mechanisms. It is therefore requested that the text of the Policy MD2 is updated to refer to housing numbers within the plan period as “minimum”.

HSL reserves the right to make further detailed comments on delivery rates and the housing trajectory as the plan progresses.

Neighbourhood Centre and Country Park

Early phases of development from Village C can help to deliver core infrastructure requirements of the WGS allocation. Village C is important in terms of creating a critical mass around the neighbourhood centre that will support schools, shops, community facilities and public transport improvements.

Initial phases of the proposed country park would also significantly improve residential amenity and provide access to open space for future residents of the Garden Suburb allocation. It is therefore important that housing delivery from Village C is realised early on in the Local Plan period. In accordance with Framework paragraph 72, this approach would help to ensure the wider allocation would have good access to services and facilities to support a sustainable community.

It is requested that draft Policy MD2 is amended so that it recognises the contribution that early delivery of homes and infrastructure at Village C can make as part of an area of distinct but complimentary neighbourhoods whilst maximising private sector investment in infrastructure. This will help to ensure early delivery of key community infrastructure and that housing delivery targets are met:

10.2.5 The Garden Suburb will comprise three new Garden Villages. Two of these villages will be extensions to existing communities at Grappenhall Heys and at Appleton Cross / Pewterspear. The third will be a new community at the eastern end of the Garden Suburb adjacent to the A50 to be delivered early in the plan period along with core infrastructure such as a strategic link to the A50 and initial phases of the country park.

Policy INF5 Delivering Infrastructure

HSL welcome the reference at Para 7.5.7 to the strategic link road. To ensure the plan is positively prepared it is fundamental to the tests of soundness that the strategic link road is also properly acknowledged in Policy INF5 and its future delivery by planning obligations considered sound. This approach will ensure appropriate mechanisms for infrastructure delivery within the WGS beyond the first 5 years of the plan are in place, providing certainty.

Conclusion

Overall, HSL are supportive of the principle of Policy MD2, subject to the comments and suggestions above which it is submitted would improve the effectiveness and therefore soundness of the policy. This representation should however be considered as an objection to the wording of draft Policy MD2 and as such HSL would like to participate in the hearing session for the WGS proposals at the Local Plan Examination.

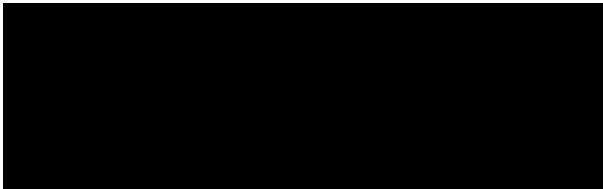
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In addition, HSL reserves the right to comment further on Policy MD2 and the plan as a whole as it progresses to Examination including but not limited to the following policies;

- Policy DEV1
- Policy DEV2
- Policy GB2
- Policy INF5

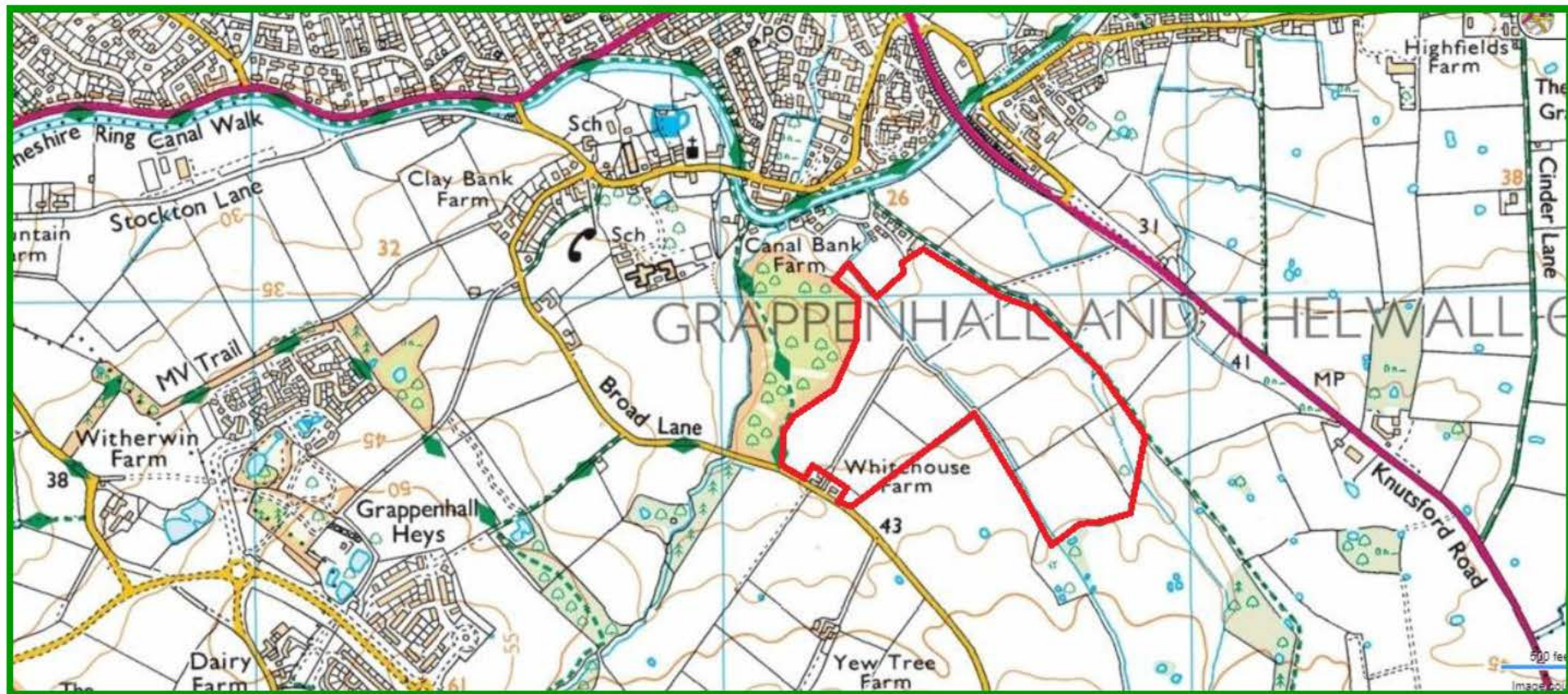
HSL is currently developing its proposals for the Village C area and would welcome the opportunity to engage with the Local Planning Authority on this with a view to preparing a Statement of Common Ground with the Council as part of the EiP process.

Yours Sincerely,



Jon Penrose MRTPI
Senior Planner
T: 0161 819 6570

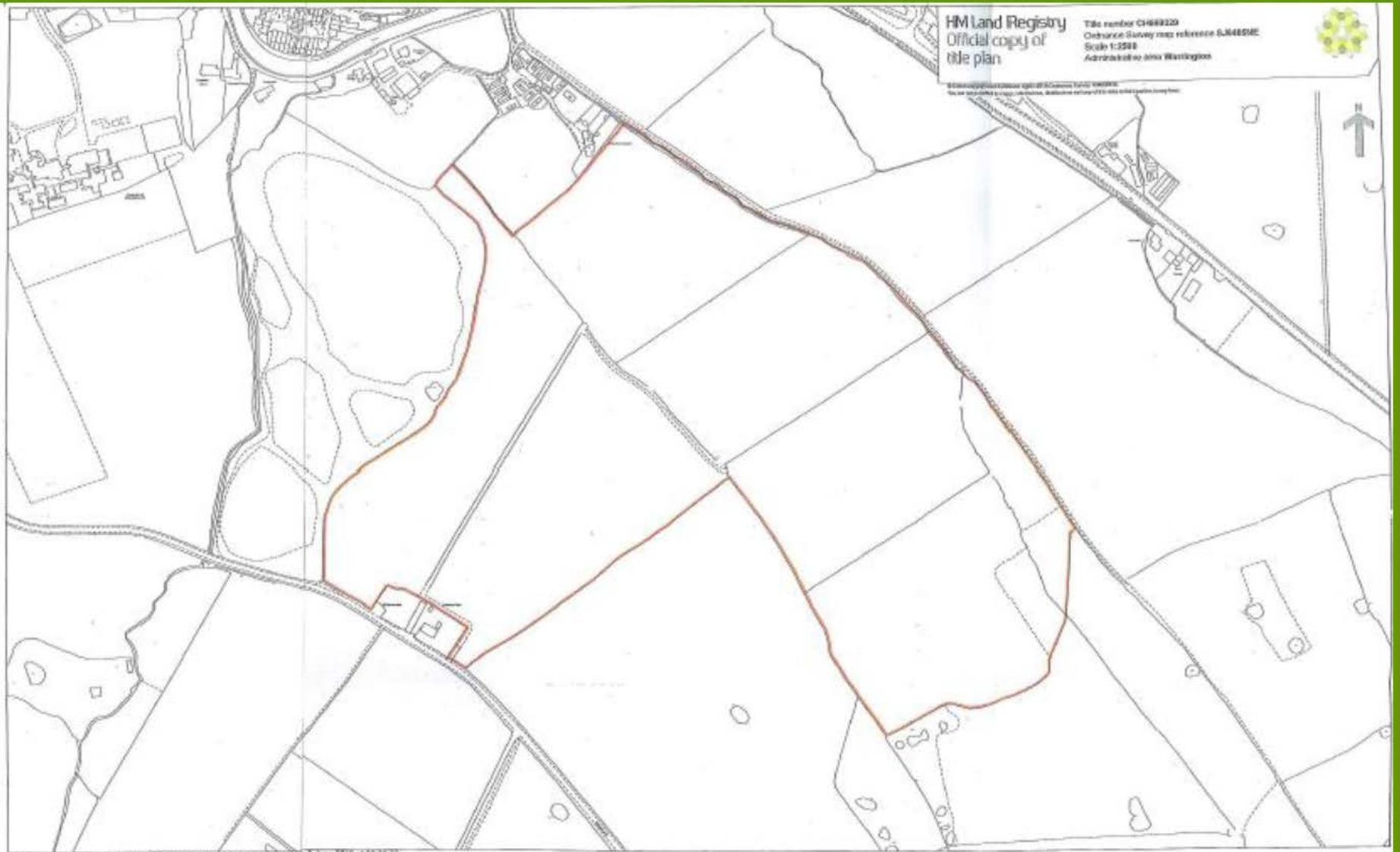
Appendix 1 – Site Location Plan





HM Land Registry
Official copy of
title plan

Title number CH69229
Ordnance Survey map reference SJ44805E
Scale 1:2500
Administrative area Warrington



This official copy issued on 2 June 2015 shows the state of this title plan as of 2 June 2015 at 08:26:28.
It is published on the basis of the information provided in the application for registration under the Land Registration Act 2002.