
Representation to the Warrington Proposed
Submission Version
Local Plan 2017 - 2037

Representations on Behalf of Miller Homes

June 2019

Representation to the Warrington Proposed Submission Version
Local Plan 2017 - 2037

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1.0 INTRODUCTION

- 1.1 This representation has been prepared by Barton Willmore on behalf of Miller Homes (our “Client”) and is submitted in response to the Warrington Submission Version Local Plan (“Submission Version”) consultation.
- 1.2 The Submission Version consultation provides an opportunity to comment on Warrington Borough Council’s (“the Council”) proposed development strategy to meet its identified development needs. Once adopted, the Local Plan will replace the Core Strategy (2014).
- 1.3 At the outset, we wish to note that whilst our Client generally welcomes the Council’s approach to growth outlined within the Submission Version, they do object to the proposed spatial strategy and related policies as drafted which are considered to be unsound.
- 1.4 In preparing this representation, Barton Willmore has undertaken a thorough review of the accompanying evidence base documents published alongside the Submission Version. This review, having regard to national policy requirements and guidance, has informed the content of this representation with a particular focus on the soundness of the Council’s development strategy.
- 1.5 We submit these comments with a view to ensuring that the Local Plan can ultimately be found sound, consistent with the guidance contained in the National Planning Policy Framework (NPPF).
- Land at Hollins Lane, Winwick
- 1.6 Our Client has actively promoted their land interests at Hollins Lane, Winwick through the emerging Local Plan process since 2017.
- 1.7 This representation is supplemented by a site layout plan prepared by JDA Architects (Appendix 1); which builds on the principles established within the development framework document, prepared by Barton Willmore (Appendix 2) which assesses the site context and its potential to accommodate residential development informed by a considered and detailed masterplan approach. This is discussed further in Section 7 of this representation.

Soundness of Plan

1.8 To assess whether a Local **Plan can be found "sound" and suitable for adoption**, Paragraph 35 of the NPPF sets out that the Plan should be:

- Positively prepared: The Plan should be prepared based on a strategy which, **as a minimum, seeks to meet the area's objectively assessed needs (where this relates to housing, such needs should be assessed using a clear and justified method)** 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;
- Justified: The Plan should be an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence;
- Effective: The Plan should be deliverable over the Plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred; and
- Consistent with national policy: The Plan should enable the development of sustainable development in accordance with the policies in the Framework.

1.9 It is our Client's position that the Plan as drafted together with its associated evidence base documents require a number of amendments to ensure that it is robust and to be found sound.

1.10 Our Client reserves their right to appear at the Examination Hearing Sessions in due course.

2.0 PLAN PERIOD, VISION AND OBJECTIVES

Plan Period

- 2.1 The Submission Version identifies the Plan period as covering 20 years between 2017 – 2037. This longevity of this Plan period is supported by our Client and aligns with paragraph 22 of the NPPF which identifies that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities.

Vision and Objectives

Vision

- 2.2 The Council has identified a 10-point Vision for the emerging Local Plan. Our Client is generally supportive of the proposed Vision for Warrington. The Vision is largely consistent with national policy and will help bring forward positive social and economic change.
- 2.3 That said, our Client is concerned that the main focus and message contained within the Vision is lost and that it should focus solely on Point (1) Bullet Points 1 – 4 which identify the main themes to ensure that the Vision remains sufficiently concise.
- 2.4 We would also suggest that if the Council is minded to retain the Vision as drafted, then “to achieve this Vision” **should be inserted prior to Points (2) to (11)** to identify how this will be delivered.
- 2.5 There is some overlap between Points 2 – 11, and it is unclear whether there is a need for this extent of detail to be provided within the Vision. There also appear to be substantial overlap and unnecessary repetition between the matters identified within the Vision and the Strategic Objectives.

Objectives

- 2.6 **The Plan’s** Strategic Objectives are identified as Objectives W1 – W6 and comprise the following:
- To enable the sustainable growth of Warrington through the ongoing regeneration of inner Warrington, delivery of strategic and local infrastructure, strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods;
 - To ensure the revised Green Belt boundaries maintain the permanence of the Green Belt in the long-term;
 - Strengthen and expand the role of Warrington Town Centre as a regional employment, retail, leisure, cultural and transport hub;

- **To provide new infrastructure and services to support Warrington’s growth, reduce congestion and more sustainable travel; and encourage active and healthy lifestyles;**
- Secure high-quality design which reinforces the character and local distinctiveness **of Warrington’s urban area, its countryside, and its unique pattern of green spaces;** and
- Minimise the impact of development on the environment through the prudent use of resources and ensuring development is energy efficient, safe and resilient to climate change and makes a positive contribution towards **improving Warrington’s air quality.**

2.7 Our Client is broadly supportive of the objectives listed above as these remain largely unchanged from the previous iteration of the Plan. Due to the presentation of the Objectives following a review of the Plan requirements, it would appear that the Submission Version is self-serving and may not adequately address the actual needs of the Borough. Continued significant attention is given to the Urban Area and its sustainable development to the ongoing detriment of the outlying settlements and rural locations of the Borough. Our Client considers that the Local Plan needs to be sufficiently equipped to respond to these issues, and to secure the vitality and viability of these outlying settlements and rural areas. This recognition should be made upfront within the Objectives. These concerns were raised following the publication of the Preferred Development Option in 2017 and have still not yet been addressed.

Spatial Strategy

2.8 The Council has set out its approach to the spatial strategy to meet the needs of the Borough over the Plan period, and which involves the need for Green Belt release. This includes a new Garden Village Suburb, South West Urban Extension and incremental growth around the outlying settlements. The justification for this approach is the ability of the sites to deliver the housing needs of the Borough, providing access to employment, shopping and retail facilities. It is also considered that incremental growth within the settlements will ensure the long-term integrity of the Green Belt. The reason for discounting other options relate to infrastructure constraints to deliver; impact on the Green Belt; traffic constraints; ecological impact; and sterilisation of mineral resources.

2.9 Whilst the need for development in outlying villages is supported, we object to the continued approach taken by the Council as to how the amount of appropriate **“incremental growth”** for each outlying settlement has been determined. **The Council’s**

justification for **this approach is based on a 10% growth limit as set out in the Council's** response to the Regulation 18 consultation, but it is not based on any substantiated evidence. **The Council's justification for the 10% limit** appears to be in relation to settlement size, ensuring that development is capable of being accommodated without changing the character of the respective settlement, and in a sustainable manner to ensure the viability and vitality of the settlement over the Plan period. It is not considered that the character of the outlying settlements will be harmed by this level of growth, and nor would it be if the level of housing growth were increased further.

- 2.10 The Council has also identified their case for exceptional circumstances to justify Green Belt release. **It is our position that the Council's justification and reason for Green Belt release is compliant with Paragraph 137 of the NPPF and it has been demonstrated that there is insufficient capacity to meet the Borough's housing needs within the Urban Area** accordingly, Green Belt release is required. This is supported by our Client.

3.0 HOUSING REQUIREMENT OVERVIEW

Strategic Planning Policy DEV1 – Housing Delivery

- 3.1 The Council has identified that between 2017 and 2037, a minimum of 18,900 new homes **will be delivered to meet Warrington’s housing need and support its economic growth** aspirations, which equates to 945 dpa. We set out our comments in relation to this below.

Housing Need Context

- 3.2 The Mid-Mersey Strategic Housing Market Assessment (SHMA) and subsequent updates produced for the Council by GL Hearn sets out the future housing need established within the Mid-Mersey Strategic Housing Market Area. Its subsequent updates produced by GL Hearn on behalf of the Council provide an assessment of the likely future housing needs of Warrington Borough over the Plan period 2017 to 2037.
- 3.3 In representations submitted to the 2017 Preferred Development Option, we confirmed that our Client was largely supportive of the need for a housing requirement higher than the assessed level of housing needs, with the exception of concerns in relation to market signals and economic projections.
- 3.4 Following the publication of the NPPF updates (2018 and 2019), it is noted that the Council **instructed GL Hearn to prepare a Local Housing Needs Assessment (“LHNA”) utilising the standard methodology, with a re-based plan base date of 2017.** This builds upon the Liverpool City Region SHELMA and has utilised the same assumptions and discusses this in the context of the standard methodology. This has been read and assessed in **conjunction with the Council’s Development Options and Site Assessment Technical Report (March 2019).**
- 3.5 Our Client welcome the identification of a housing requirement which is above the standard methodology requirement of 909 dpa. That said, we do have a number of comments with the approach and consider that the figure should indeed be higher than that currently set out in the Submission Version. We set out our rationale for this below.

Standard Methodology

- 3.6 The standard method housing need for Warrington is 909 dpa based on 2014 based household projections; however, it is acknowledged within the LHNA that this is only a minimum need and there may be reasons for the Council to adopt a housing requirement in excess of this.

- 3.7 The standard method has three components – starting point/baseline; market signals adjustment; and cap. The starting point is the 2014 – based household projects, which indicate a household growth of 792 households per annum. An adjustment to the demographic baseline has been added for market signals, equating to an adjustment of 14.75%, resulting in a need for 909 dpa. A ‘cap’ has not been applied because Warrington does not currently have a housing target and the market signal adjustment is less than 40%.
- 3.8 As such, because the capped figure is greater than the minimum annual local housing need figure, the minimum OAN is 909 dpa, in line with the standard methodology, which equates to the growth of 28,600 people over the period 2017 – 2037. This is based on a ‘policy off’ approach.
- 3.9 However, it is acknowledged within the LHNA that this is a minimum need and a ‘policy on’ approach which allows for a housing requirement with a greater level of jobs growth may be more appropriate.
- 3.10 A ‘policy on’ approach is supported by our Client because it will ensure that the demographic needs of the Borough are met, help to meet the affordable housing requirements, and will provide an increase in assessed demographic needs.
- 3.11 In light of the above, whilst the baseline housing need position is therefore considered to be 909 dpa, the implications of four economic scenarios on the housing requirement for Warrington were considered. These included Cambridge Econometrics; Oxford Economic Baseline Projection; Past Employment Trends; and Strategic Economic Plan and ranged from 635 to 1,240 jobs per annum, the latter of which when adjusted equates to 954 jobs per annum. The reason for the reduction within the LHNA to the SEP is due to economic activity rates. Whilst this overall figure is substantially lower than that proposed in the previous iteration of the Plan, **and it is our Client’s position that a higher economic growth scenario should be pursued**, our main concerns with the requirement relate to the lack of uplift applied to affordable housing need.

Housing Requirement

- 3.12 Utilising the standard method and adjustments, the housing need would equate to 909 dpa. However, on the basis that this figure would not support the anticipated level of growth required for growth in the Borough, the LHNA has indicated that a requirement of 945 dpa would allow for an adjustment to household representation in younger age groups.

- 3.13 The LHNA suggests that further uplift to address affordable housing need more promptly would be required; however, it was concluded that on the basis that not all affordable housing need would be capable of being building out, nor is the demand that high, there is no requirement to meet this need.
- 3.14 Accordingly, it is suggested within the LHNA that a requirement of 950 dpa would be appropriate. This would allow for the delivery of more affordable homes, and whilst there is no set methodology, other LPAs have utilised either 5% or 10% uplift.
- 3.15 This recommendation has not been carried forward as Policy DEV1 identifies a need for a minimum of 18,900 new homes to be delivered over the Plan period, and which equates to an average of 945 dpa and has only assessed three options. These options identified within the Options and Site Assessment Technical Report ranged from (a) 909 dpa; (b) 945 dpa; or (c) 735 dpa. Option (b) was identified as the housing requirement which best **matched economic growth aspirations and reflected the Council's commitment to** addressing affordability and represents a 4% over-requirement, which the Council considers is compliant with PPG given the potential for a slowdown in economic growth delivered through SEP. This in conjunction with an adjustment to household formation rates, which **has in the Council's view sought to address the instances of worsening** affordability.
- 3.16 On this basis, whilst the Council has confirmed why options (a) or (c) were not selected, it is unclear why the further options of (d) of 955 dpa based on a 5% uplift was not assessed or selected given that this is what was pursued in the 2017 Preferred Development Option and aligns with the recommendations set out in the LHNA; or (e) why 1,000 dpa based on a 10% uplift for affordable housing was not pursued.
- 3.17 It is our position that pursuing a minimum housing requirement of 955 dpa would ensure that it is above the standard method, boosts economic growth, and achieves the demographic, economic and affordable housing need by delivering more homes overall and increase the market and particularly housing supply in the Borough during the Plan period and beyond. This is particularly prevalent given the need for Green Belt release and would only represent a further 5% uplift to the OAN and would account for affordable housing need. As such, it is unclear why this option has not been pursued. Furthermore, a 10% uplift to an OAN of 909 dpa to account for affordable housing need would result in a housing requirement of 1,000 dpa, and would help to ensure that economic-led need, demographic, economic and affordable housing are met through the delivery of more market and affordable homes.

- 3.18 As such, whilst our Client welcomes the **Council's approach in pursuing a figure** significantly higher than the standard method requirement of 909 dpa, it is our view that a requirement of 945 dpa does not represent the most suitable level of housing growth and further uplift is required to ensure that the housing requirement delivers the requisite amount of housing required to achieve the demographic, economic and affordable housing needs of the Borough by delivering more homes overall.
- 3.19 Accordingly, a further uplift to a minimum of 955 dpa or 1,000 dpa would therefore be appropriate. This is to ensure that it aligns with the economic growth aspirations of Warrington, and its role within the Warrington and Cheshire LEP, and to ensure compliance with the NPPF and PPG.

Housing Distribution

- 3.20 The Council is seeking to deliver the majority of new homes within the existing main Urban Area of Warrington, the existing inset settlements, and other windfall sites within the SHLAA, with an indicative capacity of 13,726 new homes. This will be supplemented by Green Belt release and includes a Garden Suburb (6,490 homes) and the South West extension (1,631 homes). Further housing (1,085 dwellings) will also be delivered on allocated sites which are proposed to be removed from the Green Belt in Burtonwood (160 homes); Croft (75 homes); Culcheth (200 homes); Hollins Green (90 homes); Lymm (430 homes); and Winwick (130 homes).
- 3.21 Our Client has a number of concerns with the **Council's** identified housing supply and distribution, particularly within the Waterfront/Town Centre areas and this is discussed further in Section 4 of this representation.
- 3.22 Furthermore, our Client also has a number of concerns with the continued over-reliance on the South-West Urban Extension and Garden Suburb to meet a significant proportion **of Warrington's housing needs over the Plan period up to 2037**. Our concerns are summarised below and provided in more detail in Section 4 of this representation.

Garden City Suburb (Policy MD2)

- 3.23 The Garden City Suburb area of growth relates to a large area of Green Belt and non-Green Belt land extending from the south-east of the Warrington Urban Area. The area is identified as a strategic mixed-use allocation and is the largest single contributor towards the future housing needs of the Borough; it will deliver approximately 7,400 new homes, and 116 ha of employment land. Only 5,100 new homes are expected to be delivered within the Plan period. It will comprise three Garden Villages, a central neighbourhood centre, employment zone and green infrastructure network.

- 3.24 Taking into account the above, our Client does not object to the conclusion made by the Council that this area provides a suitable location in which to deliver a large number of new housing and strategic employment opportunities, and consider that it accords with paragraph 72 of the NPPF in this regard.
- 3.25 The Garden City Suburb area of growth relates well to the existing urban area and is of a scale necessary to provide the opportunity to deliver the amount of employment land needed to facilitate the continuing economic success and competitiveness of Warrington. It will deliver 116 ha of employment land, at the junction of the M6 and M56. The area is found to fulfil a weak role within the Green Belt and forms part of the original New Town Plans for Warrington which are yet to be fully realised.
- 3.26 **Our Client's principal concern relates** to the deliverability of this area in its entirety over the Plan period. This is discussed in Section 4 of this Statement.

South West Warrington (Policy MD3)

- 3.27 The South West Urban Extension seeks to deliver 1,600 new homes and will involve the release of circa 112 hectares from the Green Belt. Our Client does not object in principle to the release of this land on the basis that it accords with paragraph 72 of the NPPF. **Our Client's principal concern relates to the deliverability** of this area in its entirety over the Plan period. This is discussed in Section 4 of this Statement in terms of the proposed timescales envisaged and the assumptions proposed.

Outlying Settlements

- 3.28 The Preferred Development Option identified a need for 1,190 homes to be delivered on seven outlying settlements – Lymm (500 homes), Culcheth (300 homes), Burtonwood (150 homes), Winwick (90 homes), Croft (60 homes), Glazebury (50 homes), and Hollins Green (40 homes). 1,085 dwellings are now proposed to be delivered on allocated sites within outlying settlements, which include Burtonwood (160 homes); Croft (75 homes); Culcheth (200 homes); Hollins Green (90 homes); Lymm (430 homes); and Winwick (130 homes). Glazebury has been removed from the 2019 Submission Version on the basis that all of the sites performed well in terms of Green Belt and the requirements have all been reduced.
- 3.29 Our Client supports the principle of allocating land around the outlying settlements, and the need to boost homes within these areas. However, it is our view that the amount of housing proposed within these outlying settlements is not sufficient and further land release is required. This is on the basis that the Urban Capacity supply is insufficient to **meet the Council's needs over the Plan period as evidenced in** Section 4 of this

representation and that further Green Belt release is required to facilitate this requirement.

- 3.30 It also remains unclear how the growth options for each outlying settlement have been **calculated or defined because it appears that “incremental growth” is the main** contributing factor in each option considered by the Council. It appears to be based on a submitted site by site basis rather than examining what the needs of each settlement actually are as only a 10% incremental growth rate has been applied to each settlement.
- 3.31 It is our view that the Settlement Profiles document published as part of the 2017 consultation should be updated as part of the Local Plan evidence base to take account of the actual future housing needs for specific types of housing in each outlying settlement, even as a proportion of the future demographic needs of the Borough, particularly as it is noted that there is a requirement for large (4+ bed) houses within the Borough. A detailed review of the health of facilities and services, beyond primary, secondary education, and health care capacity is required.
- 3.32 In the outlying settlements, only an incremental growth scenario has been assessed. As a result, it is unclear whether the approach to development is the most appropriate given the needs, opportunities, capacity and constraints of the settlement. For this reason, the approach to growth in outlying settlements and Winwick in particular cannot be consistent with national planning policy and as such is considered by our Client to be unsound and an approach which they object to.

Winwick Specific

- 3.33 It is noted that Winwick has been included as a settlement within the outlying settlements hierarchy where Green Belt release is proposed. The inclusion of Winwick with this list of settlements acknowledges it is a settlement which is capable, suitable and in need of additional residential development during the Plan period.
- 3.34 The **Council’s original justification for growth in Winwick is that it would support a pattern of development providing for “incremental” growth (in each identified outlying settlement)** and as such a 10% growth rate would be appropriate.
- 3.35 Our Client disagrees. Whilst our Client supports the identification of Winwick as an outlying settlement, it is our view that in respect of its size and role, further housing is capable of being accommodated at the edge of the settlement through further Green Belt release **and that development on more suitable sites such as our Client’s site at Hollins Lane, Winwick is appropriate.**

- 3.36 This is on the basis that the amount of housing to be delivered in Winwick should be higher than 130 dwellings and should be reflective of its proximity to the Warrington Urban area and excellent road linkages.
- 3.37 **It is noted that within the Council's Site Assessment Technical Report (2019) that an option was considered by the Council to develop an urban extension around Winwick in response to the number of sites being promoted. However, this was discounted due to the fragmented nature of the various sites being promoted, which may result in difficulties in terms of infrastructure delivery, impact on the character of Winwick and transport, air and noise pollution constraints. We disagree with this approach for the aforementioned reasons.**
- 3.38 As such, in the case of Winwick and other outlying settlements, only an incremental growth scenario has been assessed. As a result, it is unclear whether the approach to development is the most appropriate given the needs, opportunities, capacity and constraints of the settlement. For this reason, the approach to growth in Winwick and the outlying settlements cannot be consistent with national planning policy and as such is considered by our Client to be unsound.
- 3.39 Accordingly, it is our **Client's** view there is a clear justification for the proposed housing growth in Winwick to be increased to support housing needs and continued service vitality and viability to provide for a sustainable pattern of development, and to ensure the deliverability of the Plan requirements through a much greater diversification of the supply to promote market choice.
- 3.40 Comments in relation to Land to the north of Winwick (Policy OS9) are provided in Section 5 of this Statement.

Housing Trajectory

- 3.41 Paragraph 73 of the NPPF identifies that strategic policies should include a housing trajectory illustrating the expected rate of housing delivery over the Plan period, and the anticipated rate of development of sufficient sites; identify and update annually a supply of specific and deliverable sites sufficient to provide a minimum of five years worth of deliverable housing land against their housing requirement set out in adopted strategic policies or against their local housing need if over 5 years old.

- 3.42 The Council is seeking to apply a stepped approach to housing delivery as set out below:
- 2017 – 2021 – 847 dpa
 - 2022 – 2037 – 978 dpa
- 3.43 It also states that if monitoring indicates that a 5-year deliverable and / or subsequent developable supply of housing land over the Plan period can no longer be sustained, the Council will give consideration to a review or partial of the Local Plan.
- 3.44 The Council contests that it has afforded due consideration to the rate that new homes can be built on different types of sites within the overall land supply and lead in times for supporting infrastructure, and that the Plan provides for a sufficient land supply to deliver the overall requirements of the Borough.
- 3.45 However, it is acknowledged that there will be a lower rate of housing delivery in the first five years due to Green Belt release and infrastructure requirements. It is noted that the **Council's housing land supply and performance (i.e. Housing Delivery Test) will be assessed against the Stepped Housing Trajectory rather than the annual average housing target of 945 dpa.**
- 3.46 **It is our Client's view that a positive approach to development should be taken, and that a phased "cap" to development should not be utilised;** this should be removed in its entirety. The stepped approach appears to be a consequence of the Council placing an over-reliance on the delivery of Strategic Sites, whereby the delivery of actual housing will be delayed as a result of associated infrastructure requirements.
- 3.47 Accordingly, the Council needs to review its development strategy to ensure that sufficient flexibility is built-in to the Plan to facilitate the early delivery of new housing during the Plan period, regardless of whether this approach would result in a higher rate of delivery within the first 5 years of the Plan period. To this end, it is not considered that site-specific phasing through the Plan policies is required, as the market and infrastructure requirements will ultimately dictate the phasing strategy. It is also unclear if there is an ability in the market to facilitate the deliver the amount of apartment housing proposed in the waterfront and town centre areas.
- 3.48 The Submission Version has also indicated that *"If monitoring indicates that a 5-year deliverable and / or subsequent developable supply of housing land over the Plan period can no longer be sustained, the Council will give consideration to a review or partial review of the Local Plan"*.

- 3.49 Policy DEV1 states that the Council will only give due consideration to a review or partial review of the Local Plan – this is not a firm commitment. Our Client considers it necessary to include a mechanism to ensure that the Council is able to demonstrate and maintain a delivery 5-year housing land supply throughout the Plan period. This should comprise either a partial review of the Local Plan if necessary, triggered after a period of under-delivery (such as 3-5 years). This will provide greater certainty to developers in relation to the circumstances when further land release will be required. This should be applicable to the overall housing requirement figure of 945 dwellings rather than the phased trajectory.
- 3.50 This approach as drafted is contrary to Paragraphs 28 – 33 of the NPPF clearly set out the need for Local Plans to be underpinned by relevant and up-to-date evidence and should be reviewed every 5 years. Regard has been made to these policy requirements in the preparation of this representation.
- 3.51 As detailed above, **an assessment of the Council’s housing supply has been undertaken** and is discussed in Section 4 of this Statement.

4.0 HOUSING LAND SUPPLY POSITION OVERVIEW

Context

- 4.1 For Warrington, Policy DEV1 states most new homes will be delivered within the existing **main urban area, the existing inset settlements and other sites identified in the Council's** 2018 Strategic Housing Land Availability Assessment (SHLAA), which together have an identified deliverable capacity for a minimum of 13,726 new homes.
- 4.2 Combined with sites allocated as sustainable urban extensions in Policy DEV1, a small site allowance and completions in 2017/18, the Housing Trajectory at Appendix 1 of the Submission Version Local Plan claims the Council has a total developable supply of 20,643 dwellings over the Plan period. The sources of supply are repeated in Table 1 below.

| No. | Location | No. of Homes |
|-----|--|---------------|
| 1 | Town Centre | 4,007 |
| 2 | Wider Urban Area (SHLAA Sites < 0.25ha) | 4,133 |
| 3 | Waterfront | 2,542 |
| 4 | South West Extension | 1,631 |
| 5 | Garden Suburb (Phase 1) | 930 |
| 6 | Garden Suburb (Masterplanning area) | 4,201 |
| 7 | Inset Settlements (SHLAA Sites < 0.25ha) | 221 |
| 8 | Inset Settlements (Green Belt release) | 1,085 |
| 9 | Other (SHLAA Sites < 0.25ha) | 90 |
| 10 | Small Site Allowance (Sites > 0.25ha) | 1,444 |
| 11 | Completions (2017-2018) | 359 |
| | Total: | 20,643 |

Table 1: Warrington Housing Land Supply

- 4.3 **Having reviewed the Council's evidence base¹**, our Client is concerned that the Council has overestimated the availability and deliverability of the housing land supply within the Plan period. The importance of having a robust and realistic evidence base is paramount to the soundness of the Local Plan given that its findings seek to justify whether the Council's **development strategy will** meet the **Borough's** housing needs over the next 30 years. As such, this Section of our representation seeks to outline our key areas of concern

¹ SHLAA (2018), Urban Capacity Study (2019), Development Options and Site Assessment Technical Report (2019) and Viability Assessment (2019)

that need be addressed prior to the submission of the Local Plan to the Secretary of State. This response should be read in conjunction with Appendix 3 of this Submission.

National Planning Policy Framework (NPPF) (2019)

Section 5: Delivering a sufficient supply of homes

- 4.4 Paragraph 67 of the NPPF requires strategic policy making authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment (SHLAA). From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 4.5 Planning policies should identify a supply of specific, deliverable sites for years one to five of the plan period (with the appropriate buffer) and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.
- 4.6 Paragraph 73 of the NPPF requires strategic policies to include a trajectory illustrating the expected rate of housing delivery of the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of delivery for specific sites.
- 4.7 **Annex 2 of the NPPF seeks to define the terms 'deliverable' and 'developable'. For a site to be considered deliverable, sites for housing should:**

"be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example, because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans)

b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant for permission in principle, or is identified of a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years".

4.8 For a site to be considered developable, the NPPF defines the term as:

"...sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged."

4.9 In terms of windfall sites, the NPPF² states that where an allowance is to be made for windfall sites as part of anticipated supply, *"there should be compelling evidence that they will prove a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."*

Section 11: Making effective use of land

4.10 The NPPF is clear that planning policy should promote an effective use of land in meeting the needs for homes and other uses, whilst safeguarding and improving the environment. As such, national policy seeks to make as much use as possible of previously developed or 'brownfield land', **except where this may cause conflict with other policies within the Framework³.**

4.11 To ensure planning policies make efficient use of land and achieve appropriate densities, paragraph 122 of the NPPF states local planning authorities should consider:

- The identified need for different types of housing and other forms of development and the availability of land suitable for accommodating it;
- Local market conditions and viability;
- The availability and capacity of infrastructure and services – existing and proposed and their potential for further improvement;
- Desirability to maintain an area prevailing character and setting or promoting regeneration and change; and
- Importance of securing well-designed, attractive and healthy places.

National Planning Policy Guidance (2019)

4.12 **The NPPG emphasises the importance of SHLAA's in the preparation of Local Plans and provides additional guidance on the factors that should be considered when assessing the availability, suitability and deliverability of a site. A summary of the relevant guidance relating to each of these factors is set out in Table 2.**

² NPPF Paragraph 70

³ NPPF Paragraph 117

| Assessment Criteria | Factors to Consider |
|---------------------|--|
| Suitability | <p>Sites in existing development plans or with planning permission will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability.</p> <p>In addition to the above, the following factors should be considered to assess a site's suitability for development now and in the future:</p> <ul style="list-style-type: none"> • Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; • Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation; • Appropriateness and likely market attractiveness for the type of development proposed; • Contribution to regeneration priority areas; and • Environmental/amenity impacts experienced by would be occupiers and neighbouring areas. |
| Availability | <p>A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell.</p> |
| Deliverability | <p>A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.</p> |
| Timescales | <p>The local planning authority should use the information on suitability, availability, achievability and constraints to assess the timescale within which each site is capable of development. This may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year.</p> |

Table 2: SHLAA Assessment Factors

4.13 This guidance alongside the requirements of national planning policy have been used to **inform our assessment of the Council's housing land supply set out in Appendix 1 of the**

Submission Version Local Plan to ultimately determine whether it is sufficient to meet the **Borough's housing needs.**

- 4.14 **Set in this context, the following section of our representations sets out our Client's** comments in relation to the methodology adopted by the Council in preparing their SHLAA (2018) before providing our comments in relation to the overall housing supply as well as the individual elements.

Review of the SHLAA Methodology

- 4.15 Our Client is generally supportive of the methodology set out within the SHLAA (2018), provided that it has been implemented consistently across all sites. Nonetheless, overall the methodology aligns with the guidance set out in the NPPG and, in the main, the evidence presented in the appendices is comprehensive and appropriate to justify the assumptions used in relation to density, lead-in times, build out rates and small sites.
- 4.16 Our Client does, however, have some reservations regarding the assumed lead-in times for *'sites without planning permission'* set out in Table 2.2 of the SHLAA⁴. The evidence used to justify these assumptions⁵ only considers the average lead-in times for developments of 500 units or less rather than larger strategic sites of 1000 units +. Moreover, the evidence does not factor in the time required to prepare technical reports and plans at the pre-application stage.
- 4.17 Our Client contests that the lead-in times for strategic sites (Warrington Waterfront, Garden Suburb, South West Extension and Peel Hall) should be dealt with as a separate category in Table 2.2 given their significant scale, the complexities in delivery and the policy requirement to prepare and adopt a comprehensive masterplan prior to the submission of any subsequent planning applications for individual phases of development.
- 4.18 Our experience of strategic sites elsewhere in the North West⁶ suggests masterplan documents can take approximately 18 months to prepare and adopt post adoption of the Local Plan. Technical reports and plans can be prepared alongside the masterplan document; therefore, our Client considers a 5.5-year lead in time is more appropriate for strategic sites. However, this lead-in time can often be longer when considering the infrastructure requirements for each site and this will need to be considered on a site-by-site basis.

⁴ 2.5 years for sites below 150 dwellings and 4 years for sites above 150 dwellings

⁵ Appendix 5- Sample Site Lead-In Times, SHLAA (2018)

⁶ Knowsley Council

4.19 In terms of applications for less than 500 units, typically applications can take up to a year to prepare depending on their complexity. As such, the lead in times for sites without planning permission should be increased to 3.5 years for sites below 150 dwellings and 5 years for sites above 150 dwellings but less than 500 units.

A Review of the Overall Housing Land Supply

4.20 As detailed in Table 2, the total identified housing land supply available in Warrington is 20,643 dwellings. Policy DEV1 proposes a minimum requirement of 18,900 new homes to be delivered over the Plan period (2017 to 2037), which equates to a 9% buffer in the housing land supply.

4.21 Whilst our Client welcomes the uplift to the Standard Method based housing need, as detailed in Section 3 of our representation, the Council has not provided any sound justification for not utilising the upper limit figure of 955 dwellings per annum set out in the LHNA, which would equate to 19,100 dwellings over the plan period and a housing land supply buffer of 8%.

4.22 This buffer may appear to provide a reasonable degree of flexibility in the housing land supply to deliver its housing need. However, this is only on the basis that the identified sources of supply set out in Table 2 are deemed to be sufficiently robust, which we do not consider to be the case for the reasons set out below.

Assessment of Warrington's Housing Land Supply

4.23 We have undertaken an assessment of the proposed housing land supply and contribution **towards Warrington's housing needs. This is based on evidence contained within the Council's SHLAA (2018), Urban Capacity Study (2019), Infrastructure Delivery Plan (2019) and Local Plan Viability Assessment (2019).**

4.24 **Our Client's principal** concerns relate to the deliverability and availability of brownfield **land to meet the Borough's housing needs over** the Plan period. As such, the tables set out at Appendix 1 of our representation include a detailed assessment of urban sites of 50 dwellings or more from each of the following sources of supply identified in Table 2.

1. Warrington Town Centre
2. Wider Urban Area (SHLAA Sites of 0.25ha and above)
3. Waterfront

4.25 We summarise our comments in relation to these sources of supply below before providing our comments on the deliverability of the remaining sources of supply:

4. South West Extension
5. Garden Suburb (Phase 1)
6. Garden Suburb (Masterplanning area)
7. Inset Settlements (SHLAA Sites < 0.25ha)
8. Inset Settlements (Green Belt Release)
9. Other (SHLAA Sites < 0.25ha)
10. Small Sites Allowance (Sites > 0.25ha)
11. Completions

1. Warrington Town Centre

- 4.26 Policy TC1 supports and promotes the comprehensive redevelopment and regeneration opportunities in accordance with the Town Centre Masterplan in the following areas:
- The Stadium Quarter
 - **The Eastern Gateway (including Cockhedge/St. Mary's Quarter/St. Elphin's Quarter/Thorneycroft)**
 - The Cultural Quarter (including Cabinet Works/Garven Place/Bank Park)
 - The Southern Gateway (including Wharf Street)
- 4.27 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan and at Appendix 2 of the Urban Capacity Study state that the Town Centre has the capacity to **deliver 4,007 dwellings over the Plan period and will meet 21% of the Borough's minimum** total housing need.
- 4.28 **Whilst we commend the Council's overall aspirations for Warrington Town Centre, the** development of high-density apartments and flats does not reflect the findings of the LHNA and the demand for family housing in Warrington. Furthermore, delivering a high proportion of housing growth in Town Centre locations would require significant investment in new infrastructure to meet the needs of families (i.e. schools, health care and open space) as well as a shift in perceptions to draw people to live in Town Centre locations.
- 4.29 The expectations for housing delivery in the Town Centre must be realistic, must reflect what the market can deliver and must supply housing that people need. To avoid the release of greenfield and Green Belt land through a reliance on sites and housing types that will not come forward or meet development needs is to provide a strategy that is not positively prepared, effective or justified.

4.30 To assess the robustness of the Town Centre Masterplan, Table 1 at Appendix 1 of our representation considers the suitability and deliverability of individual parcels within the Masterplan area. To summarise, our assessment has identified the following concerns:

- **Inconsistencies between the anticipated capacity of sites across the Council's evidence base⁷;**
- Not all the land identified for development in the Stadium Quarter, Arpley Road, Bridge Street Quarter, Cockhedge Quarter, St. Elphin Quarter and the Southern Gateway is currently available, with ongoing businesses and uses operating. The Council has not presented any evidence to demonstrate there are reasonable prospects that the land will become available over the plan period;
- The areas named above are subject to a complex range of landownerships and interests and there is no evidence to suggest that sites are being promoted for residential development or that there is developer interest in delivering housing on these sites. Landowners may not agree with the identified uses for their land **as identified by the Council's masterplanning exercise and there is no evidence to suggest the Council is looking to acquire these sites via a compulsory purchase order;**
- The Town Centre Masterplan does not give due consideration to the potential adverse impact of redeveloping sites on designated heritage assets in the Stadium Quarter and Cockhedge Quarter;
- At the time of writing there were no pending planning applications within the area which might be considered to be capable of making a significant contribution to the delivery of housing in the Town Centre in the short term; and
- The Southern Gateway sites fall within Flood Zones 2 and 3. In accordance with the NPPF, the Council has not provided any evidence to demonstrate that the sequential test can be overcome. This area cannot, therefore, be considered suitable to accommodate residential development.

4.31 Table 3 identifies the Town Centre Masterplan parcels which should be removed from the **Council's overall supply because they do not meet the definition of developable set out** within the NPPF. The Table also provides a breakdown of the number of units to be removed from each of the character areas.

⁷ SHLAA and Urban Capacity Study

| Character Area | Parcels to be removed ⁸ | No. of units to be discounted from 5 year housing land supply | No. of units to be discounted from overall supply |
|---------------------------|--|---|---|
| Stadium Quarter | A20 and A26 | 35 | 215 |
| Bridge Street Quarter | B2 | 62 | 62 |
| Cockhedge Quarter | C1, C2, C7 and C8 | 0 | 380 |
| St. Mary's Quarter | - | 0 | 0 |
| St. Elphins Quarter | E9, E10, E11, E12 and E13 | 0 | 94 |
| Thorneycroft | - | 0 | 0 |
| Cabinet Works | - | 0 | 0 |
| Bank Quay | - | 0 | 0 |
| Southern Gateway | I4, I5, I8, I12, I13, I14, I15, I17, I18 and I19 | 40 | 528 |
| Arpley Road | J1, J2, J3, J4 and J5 | 55 | 782 |
| Total: | | 192 | 2,061 |

Table 3: Units to be discounted from Town Centre Housing Land Supply

4.32 Overall, our Client supports the regeneration of the Town Centre. However, our assessment of the individual development parcels that make up the Town Centre Masterplan casts significant doubt over the suitability and developability of several development parcels and our Client considers that this area of growth should be treated with extreme caution.

4.33 **As a minimum, 192 dwellings should be removed from the Council's** five-year housing land supply and 2,061 dwellings should be removed from the overall Town Centre supply, reducing the supply from 4,007 dwellings to 1,946 dwellings. This discount equates to almost a 50% reduction in the Town Centre supply and on this basis alone the Council must seek to allocate additional sites which are suitable, available and deliverable and will help meet the housing needs for the Borough.

⁸ Using Urban Capacity Study references

2. Wider Urban Area (SHLAA Sites of 0.25ha and above)

- 4.34 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan confirms that SHLAA Sites within the Wider Urban Area of Warrington are expected to contribute 1,382 dwellings in the first five years of the Plan and will deliver 4,133 dwellings over the lifetime of the Plan.
- 4.35 This source of supply includes sites that are under construction, those with extant planning permission and sites that have been identified as being suitable to come forward within the Plan period but do not currently benefit from planning permission.
- 4.36 To assess the robustness of the SHLAA Sites, Table 2 at Appendix 1 of our representation considers the deliverability of sites with an indicative capacity of at least 50 dwellings or more. Of the 13 sites assessed in detail, 2 of the sites are not considered developable over the Plan period⁹. As such, the 2 sites have been discounted and 160 dwellings removed from the overall supply.
- 4.37 Notwithstanding this, expecting 100% of the 4,133 dwellings to come forward over the Plan period is completely unrealistic. We, therefore, suggest that as an absolute minimum the above sites (160 dwellings) should be discounted from the Wider Urban Area supply and a conservative 10% discount applied to the remainder of the unassessed sites for non-implementation (a further reduction of 397 dwellings).
- 4.38 Overall, a total of 557 dwellings should be removed from the Wider Urban Area supply reducing this element of the supply from 4,133 dwellings to 3,576 dwellings. Apply a 10% non-implementation rate for to the five-year housing land supply (138 dwellings) reduces this supply from 1,382 dwellings to 1,244 dwellings.

3. Warrington Waterfront

- 4.39 Warrington Waterfront extends from the south-west of the Town Centre towards the Manchester Ship Canal and broadly following the course of the River Mersey. Policy MD1 states that the Warrington Waterfront will be allocated as a new urban quarter to deliver around 2,000 new homes and a major employment area, incorporating an enlarged multi-modal port facility and a business hub.

⁹ Cardinal Newman High School (SHLAA Ref: 1178) and PDC Irwell Road, Latchford (SHLAA Ref: 2182)

- 4.40 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan and at Appendix 2 of the Urban Capacity Study confirms that the Waterfront has the capacity to deliver 502 dwellings in years 1-5 and 2,542 dwellings over the Plan period.
- 4.41 Our Client does not object to the inclusion of the Waterfront as a strategic allocation **within the Local Plan given it aligns with the Council's regeneration priorities for the Borough**. However, our Client is concerned that the trajectory as drafted does not provides a reasonable reflection of housing delivery rates in the Waterfront area in the first five years of the Plan period.
- 4.42 Appendix 2 of the Urban Capacity Study expects parcels K9 (368 units), K10 (162 units), K19 (27 units) and K20 (35 **units**) **to contribute 502 dwellings towards the Council's five-year housing land supply**. Our assessment set out in Table 3 at Appendix 1 of our representation discounts parcel K9 (Spectra Building, South of Centre Park Business Park) on the basis the site does not benefit from planning permission, is located in Flood Zone 3, and the Council has not provided any evidence to demonstrate that the sequential test can be overcome.
- 4.43 The southern part of this land parcel (parcel K10) is expected to contribute 168 dwellings to the housing land supply. Our Client does not dispute that this site is available or suitable for development over the course of the Plan period. However, the site does not benefit from planning permission and based on the lead-in times set out in Table 2.2 of the SHLAA another 107 dwellings should be removed from the five-year housing land supply.
- 4.44 In addition, the Council has not presented any evidence to demonstrate that parcels K19 **and K20 in Sankey Bridge meet the definition of 'deliverable' or 'developable' set out** within the NPPF. Both sites should be discounted, and an additional 57 dwellings removed from the five-year supply as well as the overall supply.
- 4.45 Based on our findings summarised above, 502 dwellings should be removed from the first five years of the Plan meaning the site will make nil contribution towards the five-year housing land supply. Furthermore, removing 430 dwellings from the Waterfront supply reduce the overall supply from 2,542 dwellings to 2,112 dwellings.
- 4.46 When reviewing the deliverability of the wider Waterfront site (parcels K5 and K7), our Client previously raised concerns that this area would not deliver any homes within the first five years of the Plan period due to uncertainties regarding the delivery of the Western Link Road and timescales for remediation. Appendix 2 of the Urban Capacity

Study confirms the Council seeks to push back the delivery on this site to 2023/24 to align with the timescales for the construction of the Western Link Road.

- 4.47 Whilst our Client welcomes the alterations made to the trajectory, we still consider the proposed timescales for the Western Link Road to be optimistic given its delivery will be technically challenging requiring a significant amount of engineering projects including the need for new crossings of the Manchester Ship Canal, the West Coast Mainline, and the Warrington to Liverpool Railway line.
- 4.48 The project also has the potential to result in adverse environmental effects with most routes traversing through both Morley Common and Sankey Valley Park, necessitating careful design and mitigation. However, given the progress made since the previous iteration of the emerging Local Plan and in the absence of alternative evidence we do not seek to contest the timescales set out by the Council.
- 4.49 In terms of the expected rates of delivery, beyond the first five years the trajectory for this area increases to 220-255 dwellings per annum in years 7 to 13 of the Plan. Whilst this level of development is potentially achievable given new homes will largely comprise high density flats/apartments, the proximity to the Town Centre brings into question whether this level of growth can consistently be achieved given it will be dependent on the capacity of the market, availability of finance/credit, and resourcing. These are matters which are largely beyond the control or influence of the Council. As such, the Council should not seek to rely on this site.
- 4.50 Accordingly, the most effective means by which to protect the Plan would be to reduce its reliance on the delivery of this site and provide for additional market choice in those locations which experience housing need and demand, and thus boosting overall supply. The application of this approach would significantly enhance the overall deliverability of the Plan and provide a strategy which has a greater degree of flexibility to change.

4. South West Extension

- 4.51 The South West Urban Extension includes land to the north of the A56 at Higher Walton. Policy MD3 seeks to remove this land from the Green Belt to deliver a sustainable urban extension to the main urban area of Warrington, providing 1,600 new homes. The urban extension will support a new community in a high-quality residential setting with ease of **access to Warrington's employment, recreation and cultural facilities.**
- 4.52 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan confirms the South West Urban Extension has the capacity to deliver 1,631 dwellings over the Plan

period at a rate of approximately 116-117 dwellings per annum. The Trajectory anticipates that the first homes will be completed in 2023/24 once the Western Link Road has been constructed.

4.53 Our Client understand the Council has now secured £142.5m worth of funding from the Department of Transport towards the estimated total £212m build cost for the Western Link Road and the Council's evidence suggest this will be completed by 2024. As set out above, our Client remains of the view that the proposed timescales for delivery of the Western Link Road are optimistic. However, given the progress made since the previous iteration of the Local Plan and in the absence of alternative evidence we do not seek to contest the timescales set out by the Council.

4.54 Notwithstanding this, it should be borne in mind that development on the site cannot come forward until the Local Plan is adopted and the land will be released from the Green Belt. This is expected to be December 2020¹⁰. Furthermore, Policy MD3 requires the preparation of a detailed masterplan prior to the submission of any future planning application on the site. Based on the revised assumptions set out above, the lead-in time on this site is expected to be 5.5 years. Accordingly, the trajectory should be altered to deliver the first 58 dwellings in years 2024/25.

4.55 Our Client does not dispute that the South West Extension could deliver 116-117dpa consistently over the Plan period given the scale of the opportunity available. However, the dwellings expected to be delivered in the second half of 2035/36 and 2036/37 will now be delivered beyond the Plan period and, therefore, 290 dwellings should be removed from the Council's overall supply reducing it to 1,341 dwellings.

5. Garden Village Suburb (Phase 1)

4.56 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan anticipates 930 dwellings will be delivered within the first phase of the Garden Village Suburb, 654 of which will be delivered within the first five years of the Plan period. The first phase of development will comprise the following sites owned by Homes England:

- Land at Appleton Cross – 350 dwellings
- Grappenhall Heys – 400 dwellings
- Land at Pewterspear Green – 180 dwellings

¹⁰ Local Development Scheme 2019

- 4.57 Our Client does not dispute that these sites are suitable, available and deliverable within the Plan period. However, as detailed in Table 4 at Appendix 1 of our representations our Client has concerns that the delivery rates proposed for the Appleton Cross and Grappenhall Heys sites are not achievable in the short-term given that neither site currently benefits from Reserved Matters approval.
- 4.58 Based on the lead-in times set out in Table 2.2 of the SHLAA, our Client would expect most of the housing to be delivered in years 6-10 rather than years 1-5. As such, 456 dwellings should be removed from the five-year housing land supply, reducing it to 198 dwellings.

6. Garden Village Suburb (Masterplanning area)

- 4.59 The Garden Village Suburb allocation relates to a large area of Green Belt land which extends from the south east of the Warrington Urban Area to the M6 and M56. Policy MD2 expects the Garden Suburb to deliver around 7,400 homes and a major new employment location of 116 hectares. Around 5,100 homes are expected to be delivered within the Plan period and a further 2,300 homes will come forward beyond the Plan period.
- 4.60 As set out above, phase 1 will deliver 930 dwellings across three sites at Appleton Cross, Grappenhall Heys and Pewterspear Green. The Housing Trajectory at Appendix 1 of the Submission Version Local Plan confirms the wider masterplanning area has the capacity to deliver a further 4,201 dwellings over the Plan period at a range of between 108-396 dwellings per annum. The Trajectory anticipates that the first homes will be completed in 2023/24.
- 4.61 Our Client does not object to the conclusion made by the Council that this area provides a suitable location in which to deliver a significant number of new housing and strategic employment land. However, our Clients principal concern relates to the anticipated delivery rates for the site over the Plan period.
- 4.62 Notwithstanding our comment above in relation to Phase 1 of the Garden Village Suburb development, beyond the first five years of the Plan, the trajectory for this area increases substantially to over 300 dwellings per years during years 8 – 14, before returning to a lower rate of 200 dwellings + towards the end of the Plan period.
- 4.63 To deliver 300 dwellings plus per year would require around 6 developer outlets to be working across the area at any one time. This is considered achievable given the scale of the area and the desirability of the location. However, given the proximity of the Garden Suburb to the South West Urban Extension which seeks to deliver 1,600 units over the

Plan period, the achievability of this high rate of delivery being consistently achieved will be largely dependent on the capacity of the market, availability of finance/credit, and resourcing. These are matters which are largely beyond the control or influence of the Council.

- 4.64 Accordingly, the most effective means by which to protect the Plan would be to reduce its reliance on the delivery of a single area in a single geographic location. This would provide for additional market choice, delivering new housing in those locations which experience housing need and demand, and thus boosting overall supply. The application of this approach would significantly enhance the overall deliverability of the Plan and provide a strategy which has a greater degree of flexibility to change.
- 4.65 Notwithstanding this, it should be borne in mind that development on the site cannot come forward until the Local Plan is adopted and the land is released from the Green Belt. This is expected to be December 2020¹¹. Furthermore, Policy MD2 requires the preparation of a detailed masterplan prior to the submission of any future planning application on the site. Based on our revised assumptions set out above, the lead-in times on this site are expected to be 5.5 years; accordingly, the trajectory should be altered to deliver the first 54 dwellings in years 2024/25.
- 4.66 Our Client does not dispute the rates of delivery proposed within the Housing Trajectory given the number of developers intending to deliver the development is currently unknown. However, considering the above, the dwellings expected to be delivered in the second half of 2035/36 and 2036/37 will now be delivered beyond the Plan period and, **therefore, 349 dwellings should be removed from the Council's overall supply reducing the capacity of this source of supply from 4,201 dwellings to 3,852.**

7. Inset Settlements (SHLAA Sites < 0.25ha)

- 4.67 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan confirms that SHLAA Sites within the Inset Settlements of Burtonwood, Croft, Culcheth, Hollins Green, Lymm and Winwick are expected to contribute 148 dwellings in the first five years of the Plan and will deliver 221 dwellings over the lifetime of the Plan.
- 4.68 This source of supply includes sites that are under construction, those with extant planning permission, and brownfield sites that have been identified as being suitable to come forward within the Plan period but do not currently benefit from planning permission.

¹¹ Local Development Scheme 2019

4.69 To assess the robustness of the SHLAA Sites, we have considered the deliverability of sites with an indicative capacity of at least 50 dwellings or more. Of the 1 site assessed – Land off Stretton Road/Arley Road, development is currently under construction and, therefore, the site is considered deliverable within the first five years of the Plan period. As such, our Client does not propose to remove any dwellings from this source of supply.

8. Inset Settlements (Green Belt Release)

4.70 Policy DEV1 seeks to deliver a minimum of 1,085 dwellings on allocated sites removed from the Green Belt in the outlying settlements of Burtonwood (160 homes), Croft (75 homes), Culcheth (200 homes), Hollins Green (90 homes), Lymm (430 homes) and Winwick (130 homes).

4.71 Our Client does not dispute that the sites identified for release from the Green Belt in the Inset Settlement will be delivered within the Plan period. As such, we do not propose to remove any dwellings from this source of supply as part of our assessment.

9. Other (SHLAA Sites < 0.25ha)

4.72 The Housing Trajectory at Appendix 1 of the Submission Version Local Plan confirms that SHLAA Sites of less than 0.25ha are expected to contribute 90 dwellings over the Plan period. All the sites included within this source of supply are less than 50 dwellings, therefore, we do not propose to remove any dwellings from this source of supply.

10. Small Sites Allowance (Sites > 0.25ha)

4.73 The Council has included a small site allowance of 76 dwellings per annum as part of their overall housing land supply. The justification for the inclusion of small sites is set out in paragraphs 2.60 – 2.63 of the SHLAA. Our Client considers the proposed small sites allowance is realistic given that it is based on evidenced historic trends over the past 10 **year. As such, the Council's approach to the small sites allowance complies with paragraph 70 of the NPPF.**

11. Completions

4.74 The overall supply figure set out at Appendix 1 of the Submission Version Local Plan includes the 359 dwellings completed in 2018/19. Our Client does not dispute this figure and its contribution towards the **Council's** housing land supply.

Overall Housing Land Supply Conclusions

4.75 **Our assessment of Warrington’s housing land supply has identified a reliance on the delivery of several strategic sites to meet the Borough’s future housing needs. As set out above, our Client has significant concerns regarding the availability and deliverability of urban sites within the Town Centre and the Waterfront area as well as the anticipated delivery rates for the South West Extension and Garden Village Suburb given the lead-in times for delivery and their proximity to one another.**

4.76 Table 4 below summarises the differences between the Council’s claimed housing land supply Plan compared to our own assessment of the housing land supply.

| No. | Location | WBC Total Supply | BW Total Supply | Difference |
|-----|--|------------------|-----------------|--------------|
| 1 | Town Centre | 4,007 | 1,946 | 2,061 |
| 2 | Wider Urban Area (SHLAA Sites < 0.25ha) | 4,133 | 3,576 | 557 |
| 3 | Waterfront | 2,542 | 2,112 | 430 |
| 4 | South West Extension | 1,631 | 1,341 | 290 |
| 5 | Garden Suburb (Phase 1) | 930 | 930 | 0 |
| 6 | Garden Suburb (Masterplanning area) | 4,201 | 3,852 | 349 |
| 7 | Inset Settlements (SHLAA Sites < 0.25ha) | 221 | 221 | 0 |
| 8 | Inset Settlements (Green Belt release) | 1,085 | 1,085 | 0 |
| 9 | Other (SHLAA Sites < 0.25ha) | 90 | 90 | 0 |
| 10 | Small Site Allowance (Sites > 0.25ha) | 1,444 | 1,444 | 0 |
| 11 | Completions (2017-2018) | 359 | 259 | 0 |
| | Total: | 20,643 | 16,956 | 3,687 |

Table 4: Housing Land Supply Summary

4.77 Based on our analysis, we have identified a significant shortfall in the overall housing land supply. To ensure that the Council meets its proposed housing requirement of 19,100 dwellings, an additional 1,944 dwellings need to be identified within the Local Plan. However, as set out above, the Council should seek to provide 10% flexibility in their supply to allow for non-implementation.

4.78 Overall, the Council will, therefore, need to identify additional land to deliver 3,834 dwellings over the Plan period.

- 4.79 Considering alternative scenarios, based on the LHNA upper limit of 19,100 dwellings (955 dpa) with a 10% allowance for flexibility in the supply the Council would need to identify an additional 4,054 dwellings. Based on a higher uplift to 20,000 dwellings (1,000 dpa) which includes a 10% uplift for affordable housing the Council would need to identify an additional 5,044 dwellings over the Plan period with a 10% allowance for flexibility in the supply.
- 4.80 Set in this context, there is an urgent need for the Council to allocate additional land within the Warrington Local Plan, which is suitable, available and deliverable and will help to meet the housing needs of the Borough. Considering our concerns regarding the deliverability of urban sites within the Town Centre and at the Waterfront, the Council needs to consider the release of further Green Belt sites to meet the needs for low-density **family housing. This includes our Client's interests at Hollins Lane, Winwick. The merits** of allocating this site for development are considered in Section 7 of this representation.

Five-Year Housing Land Supply

- 4.81 Appendix 1 of the Submission Version Local Plan anticipates that the Council will deliver 4,132 dwellings over the first five years of the Plan period. However, based on our analysis, we contest that 1,288 dwellings should be removed from this supply resulting in an overall five-year supply of 2,844 dwellings. Our assessment is based on the removal of:
- 192 dwellings from the Town Centre;
 - 138 dwellings from the Wider Urban Area;
 - 502 dwellings from the Warrington Waterfront; and
 - 456 dwellings from Garden Suburbs (Phase 1).
- 4.82 The removal of 2,844 dwellings from the first five years of the Plan will result in the delivery of these dwellings being pushed back towards the middle and end of the Plan period. This has potentially serious implications for the Council in meeting its short-term housing needs as well as maintaining a five-year housing land supply, particularly given the proposed stepped approach to housing delivery. As such, alongside a robust mechanism to secure a review of the Plan every five years, the Council needs to allocate additional land within the Warrington Local Plan, which is suitable, available and deliverable in the short term to ensure these needs are met.

5.0 SUBMISSION VERSION POLICIES

5.1 We set out below our comments in relation to a number of the proposed Submission Version Local Plan policies below. At the outset, we note that some of the policies as drafted are extremely lengthy and should be separated into different policies in order to ensure that the main elements of the policies are not 'lost.'

Policy DEV2 – Affordable Housing

Affordable Housing

5.2 Paragraph 62 of the NPPF is clear that policies should specify the type of affordable housing required, and that it should be met on-site unless off site provision or financial contribution can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities. Of these, at least 10% of the overall provision of new affordable homes is to be available for home ownership, unless this would exceed the level of affordable housing required in the area or prejudice the ability to meet the identified affordable housing needs of specific groups.

5.3 Policy DEV2 states that on sites of 10 dwellings or more, affordable housing is to be provided based on the following thresholds: (a) 20% on sites within Inner Warrington, inclusive of the Town Centre, or (b) 30% elsewhere in the Borough, and all Greenfield sites irrespective of their location. Of the affordable housing provision, 10% affordable home ownership should be provided, with the remainder affordable rent or social rent. A lower split/tenure will be permitted where it can be demonstrated that it would not be financially viable.

5.4 Our Client recognises the need to provide affordable housing provision, and there is a clear and evidenced need for the provision of 377 affordable dpa within Warrington between 2017 - 2037. However, our Client has a number of concerns with the Policy as drafted:

- The NPPF (Para 64) is clear that planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, as part of the overall contribution from a site. However, Part (2) of Policy DEV2 states that ***"the equivalent of 10% of the total number of homes within the development"***. This is inconsistent with national policy and should be updated to reflect this.
- Point 4 states that affordable housing should be provided on-site and only in exceptional circumstances, where the nature of the site is deemed unsuitable for

affordable housing, will a commuted sum be acceptable. This is contrary to Paragraph 62 of the NPPF which states whilst affordable housing is expected to be met on-site, instances where it is considered to be acceptable is where "*off-site provision or an appropriate financial contribution in lieu can be robustly justified*". The Policy should be amended to reflect and ensure compliance with the NPPF.

- Section 5.1 of **Council's Viability Report (prepared by BNP Paribas)** identifies support for the emerging affordable housing provision; however, there are instances where the Council will need to provide flexibility in their policies, and have regard to individual site viability, and where a case is made, to adjust the amount of affordable housing provision. We have established through a high-level review of the Report that circa 18 sites are identified as unviable within **Cushman and Wakefield's Viability Assessment (contained with BNP Paribas's report)**. This will in turn impact on the delivery of affordable (and open market) homes within the Borough, and the potential for the non-delivery of homes. Paragraph 34 of the NPPF is clear - Plans should set out the contributions expected from the development and should not undermine the delivery of the Plan. The conclusions of the Report raises serious questions over the deliverability and viability of the Plan.

Housing Type and Tenure

- 5.5 Paragraph 60 of the NPPF is clear that the size, type and tenure of housing needs for different groups should be assessed and reflected in planning policies. Parts 7 – 8 of the Policy identifies that residential development should provide a mix of different housing sizes and types which should be informed by the Borough wider housing mix target and any local target set by a Neighbourhood Plan, when taking into account site-specific considerations. The text refers to a table; however, no table is provided within the Policy, but instead is included within the supporting text (Table 3) which is based on an assessment identified within the LHNA with a notable demand for 1 and 2 bed affordable rented properties and 2 bed houses. There is also high demand for 3 bed market houses.
- 5.6 Our Client is supportive of the need for a mix of housing and the provision of a range of house types. However, consideration should be given to the local area and the type of housing required, rather than a Borough-wide requirement, i.e. due to variances between Green Belt and Inner-City localities. Viability also needs to be considered as part of the housing mix.

Optional Standards

- 5.7 The Policy (Parts 9 – 10) seeks to provide 20% of homes to building regulation standard M4(2) Accessible and Adaptable Dwellings and where there is an identified need 5% of new homes will be wheelchair accessible in accordance with Building Regulation Standard M4 (3).
- 5.8 Our Client is supportive of the provision of accessible homes. However, further evidence is required to support this requirement. Whilst the LHNA identifies that the economic-led need is circa 4.7% (871 new homes), as required by PPG (ID 56-07) which identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability, this evidence is not provided within the LHNA. The LHNA is clear that any decisions about the mix of housing should take account of current stock, and where the most appropriate locations for this will be. This information has not been supplied by the Council rather it states that it used the LHNA to set the percentage.
- 5.9 As such, to ensure that this Policy is robust and can be found sound, further justification is required.

Housing for Older People

- 5.10 The Council seeks to provide 20% of the affordable provision to meet the needs of older people. This will be determined on a site by site basis. Again, whilst our Client does not dispute the need for older person accommodation where evidenced, it is unclear how this provision differs from the need to provide M4(2) Accessible and Adaptable Homes or whether separate specialist housing is required, as identified within the LHNA which discusses housing with support, housing with care and care beds. Further evidence is also **required in relation to how this provision will be determined on a "site by site" basis** pending on demand and type of provision.

Policy DEV3 – Gypsy and Traveller and Travelling Show People Provision

- 5.11 No comment.

Policy DEV4 – Planning for Economic Growth

- 5.12 Our Client is broadly supportive of the level of economic growth proposed, and the need for a minimum of 362 ha of employment land to be delivered to ensure that the economic and housing needs of the Borough can be met, and the identified Vision and Objectives realised. The Policy is appropriate in helping to achieve this level of growth.

Policy DEV5 – Retail and Leisure Needs

- 5.13 No comment.

Policy GB1 – Green Belt

- 5.14 Section 3 of the Submission Version explains the approach which the Council has taken towards the release of land in the Green Belt. This Section confirms that Green Belt boundaries should only be altered where exceptional circumstances are fully justified and evidenced, through the preparation or updating of plans. The approach to defining new boundaries should be set out in strategic policies, consistent with Paragraph 135 of the NPPF, and demonstrate why normal planning and development management policies would not be adequate, any major changes in circumstances have made the adoption of this exceptional measures necessary; the consequences of the proposal for sustainable development; necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and how the Green Belt would meet the other objectives of the NPPF.

- 5.15 The Council has identified that the general extent of the Green Belt through the Plan period will be maintained until at least 2047. It is accepted that there is a need for Green Belt release and this approach is supported by our Client in principle. As set out in Sections 2 and 3, **our Client welcomes the Council’s recognition that there is a need to review and release land from the Green Belt to meet the Borough’s overall housing requirements** over the Plan period and beyond.

- 5.16 However, and upon conclusion of our assessment of urban capacity, it is considered that there is a need for further Green Belt release to meet the overall housing needs in the Borough. This is on the basis that our Client considers the Council to have over-estimated the supply from land within the Urban area, and that further Green Belt land is required to meet the housing requirements of the Borough. This is discussed in Sections 3 and 4 of this representation. It is our position that further Green Belt release in outlying settlements is required to ensure the delivery of the Local Plan and to ensure the Plan is directed to the right locations.

Policy TC1 – Town Centre and Surrounding Area

- 5.17 Our Client supports the development of the Town Centre, and the need to strengthen its viability and viability to promote a greater diversity of uses. Notwithstanding this, they have a number of concerns with the identified Key Development Sites in the Town Centre in terms of capacity and deliverability, and consider that the Council has over-estimated the scale of development, the proposed density and the timescales envisaged for the

delivery of the Town Centre regeneration sites and Southern Gateway. This is discussed in Section 4 of this representation.

Policy INF1 – Sustainable Travel and Transport

5.18 The Policy seeks to ensure that development is located within sustainable and accessible locations; priority is given to walking, cycling and public transport and that management measures such as reducing the number of cars and trip rates are proposed are utilised and that infrastructure for plug-in cars and low emission vehicles are utilised. Our Client **is supportive of the Plan's policy in respect of the need to provide a safe and efficient highway network.**

5.19 It is noted that Paragraph 111 of the NPPF clearly states that all developments which generate *"significant amounts of movement should be supported by a Transport Statement or Transport Assessment"*. This is reflected in the emerging Local Plan. Additionally, it states that *"development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe"*. It is our Client's view that this should be referenced and clearly set out within Policy INF1.

5.20 We also consider that the Policy as drafted is too extensive, and would benefit from being divided into separate elements to ensure its requirements are not lost within the text i.e. (4) protect future re-use of disused rail corridors; (5) improving freight transport provision; and (6) sustainable transport of minerals and waste could be placed as separate policies.

Policy INF2 – Transport Safeguarding

Policy INF3 – Utilities and Telecommunications

5.21 No comment.

Policy INF4 – Community Facilities

5.22 Policy INF4 seeks to promote health and wellbeing and reduce social inequality. To facilitate this, developers will be required to provide new social and community infrastructure where a development would increase demand beyond its current capacity or generate a newly arising need, and should be located in close proximity to this need. It is unclear what these community requirements are, and they have not been factored into any viability scheme. Further consideration needs to be afforded to this Policy.

Policy INF5 - Delivering Infrastructure

5.23 This Policy refers to the need for development to provide or contribute towards the provision of infrastructure needed to support it, and the Council will seek planning

obligations where development creates a requirement for additional or improved serviced and/or address the off-site impact. Where new infrastructure is required to support a development, this must be operational no later than the appropriate phase of development for which its needed. These will be sought on a case by case basis and include affordable housing, public health, biodiversity, open space infrastructure and education. The Policy states that viability will only be considered at the planning application stage where required planning obligations are in addition to those considered as part of the Local Plan Viability Appraisal, or where there are exceptional site-specific viability issues not considered as part of this Appraisal.

- 5.24 A Community **Infrastructure Levy ("CIL") is not yet in place** in Warrington. **The Council's** website indicated in 2015 that it will be introduced as part of the Local Plan, and the emerging Local Plan indicates in Para 3.3.32 that the Council will consider CIL immediately following its adoption. However, Policy INF5 does not specify when or if this will be introduced, rather the supporting text refers to *"should the Council introduce it"*.
- 5.25 No reference is made in the IDP or Viability Appraisal to the introduction of CIL and no clarification is provided as what approach the Council will take if it is introduced in the future; this would clearly impact on the contributions and infrastructure required through the IDP.
- 5.26 Furthermore, the NPPF is clear that Plans should set out the contributions expected from development. This should include setting out the levels and type of affordable housing provision required, along with other infrastructure, such as that needed for education, health, transport, flood and water management, green and digital infrastructure. Such policies should not undermine the deliverability of the Plan.
- 5.27 Furthermore, Paragraph 56 of the NPPF states that planning Obligations should only be sought where they meet all the following tests:
- *Necessary to make development acceptable in planning terms;*
 - *Directly related to the development; and*
 - *Fairly and reasonably related in scale and kind to the development.*
- 5.28 The wording of the Policy is contrary to the NPPF (Para 57) which allows for *"the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. This is a matter for the decision maker"*.

5.29 Our Client does not consider the range of requirements identified meet these tests; whilst the IDP identifies a list of requirements, and indicative costs, there are no confirmed costs directly attributed to each scheme (**albeit it is appreciated that some of the IDP's** requirements are assigned to specific allocations).

5.30 PPG Paragraph 005 (Ref ID: 10-005-20140306) states:

"evidence should be proportionate to ensure plans are underpinned by a broad understanding of viability. Greater detail may be necessary in areas of known marginal viability or where the evidence suggests that viability might be an issue – for example in relation to policies for strategic sites which require high infrastructure investment".

5.31 PPG Paragraph 007 (Ref: ID: 10-007-20140306) then states that:

"Plan makers should consider the range of costs on development. This can include costs imposed through national and local standards, local policies and the Community Infrastructure Levy, as well as a realistic understanding of the likely cost of Section 106 planning obligations and Section 278 agreements for highways works. Their cumulative cost should not cause development types or strategic sites to be unviable. Emerging policy requirements may need to be adjusted to ensure that the plan is able to deliver sustainable development".

5.32 **It is our Client's view** that, as drafted, the IDP is contrary to both the NPPF and PPG and is not based on a sound evidence base. Further details setting out how the requirements of the IDP will be delivered are required. As such, we consider the Policy as drafted to be contrary to Paragraph 173 of the NPPF and the PPG.

Policy DC1 – **Warrington's Places**

5.33 No comment.

Policy DC2 – Historic Environment

5.34 The Policy focuses on the need to preserve and protect the historic environment within Warrington. It is our consideration that this Policy is too lengthy as drafted and the requirements of the Policy are lost within the text as drafted. We would suggest that Part 2 (a) – (j) is inserted into an Appendix, rather than within the body of the text.

5.35 **In terms of "assessing development proposals"** the Policy should be amended to reflect and align with the NPPF to address the current conflict.

5.36 For example:

(4) Proposals affecting a designated heritage asset, or an archaeological site of national importance should conserve those elements which contribute to its significance., Harm to such elements will only be permitted where this is clearly justified and outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a designated heritage asset will be permitted only in exceptional circumstances

(5) Proposals which would remove, harm or undermine the significance of a non-designated heritage asset will only be permitted where the benefits are considered sufficient to outweigh the harm to the character of the local area.

5.37 This is incorrect. The NPPF is clear that in relation to (4), where a proposed development will lead to substantial harm to a designated heritage asset, LPAs should refuse planning permission unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits or criteria (a) to (d) apply relating to the nature of the unit preventing all reasonable uses no viable use of the heritage asset in the medium term through marketing; grant funding is no possible; and the harm or loss is outweighed by the benefit of bringing the site back into use. Furthermore, where a proposal will lead to less than substantial harm, this harm should be weighed against the public benefits. In terms of non-designated assets, their significance should be taken into account, and a balanced judgement required having regard to the scale of any harm or loss and the significance of the heritage asset. The Policy should be revised to ensure that it aligns with the NPPF. As drafted, it does not.

Policy DC3 - Green Infrastructure

5.38 Whilst our Client has no objection in principle to the inclusion of a policy relating to Green Infrastructure, it is inevitable in some instances that existing green space will be lost. In relation to (6) we suggest that "**where appropriate**" should be added in relation to replacement green infrastructure.

Policy DC4 – Ecological Network

5.39 Our Client welcomes Policy DC4 and the differentiation in the Policy in relation to statutory and non-statutory designations and local and national designations.

Policy DC5 – Open Space, Outdoor Sport and Recreation Provision

5.40 The Policy applies to residential development sites of over 40 dwellings or more to contribute to the provision of open space and equipped play provision, and outdoor playing pitches, and indoor sport and recreational facilities. It is unclear why sites over

less than 40 dwellings do not have to provide, as this is typically based on minimum site size requirements. However, our Client does welcome the proposed flexibility to allow for off-site provision where on-site provision is not possible or appropriate.

Policy DC6 – Quality of Place

- 5.41 Our Client is generally supportive of this Policy and consider that it will ensure the delivery of high-quality development. It is noted in relation to Part (6) that in relation to masterplans that they may be adopted as SPGs or take the form of less formal planning guidance or development briefs. Clarification is required at the outset as to the approach which will be taken to provide certainty to developers.

Policy ENV1 – Waste Management

- 5.42 No comment.

Policy ENV2 – Flood Risk and Water Management

- 5.43 Our Client is generally supportive of this Policy. However, elements of it such as (4) (i.e. that no development should take place within 8m of the top of a water course etc) should be a matter of detail on a site-by-site basis discussed in conjunction with the LLFA rather than stipulated through Policy. This is a theme reiterated throughout the Policy, and which needs to be reviewed and amended accordingly.

Policy ENV3 – Safeguarding of Minerals Resources

Policy ENV4 – Primary Extraction of Minerals

Policy ENV5 – Energy Minerals

Policy ENV6 – Restoration and Aftercare of Mineral and Waste Sites

- 5.44 No comment.

Policy ENV 7 – Renewable and Low Carbon Energy Developments

- 5.45 This Policy seeks to minimise carbon emissions generated by and from new development. Site comprising more than 11 units in all locations outside of the strategic allocations will be required to meet at least 10% of their energy needs from renewable and/or other low carbon energy source(s). Strategic allocations will be required to establish or connect to decentralised energy systems which use or generate renewable or low carbon energy and ensure that at least 10% of their energy needs can be met from renewable and/or low carbon energy source(s).
- 5.46 **It is our Client's position that** the Policy should be revised to ensure it is consistent for all sites, and should not distinguish between non-allocated and allocated sites. It is also unclear how this Policy aligns with Policy DC6 which seeks to encourage the introduction of environmental design principles and climate change; reduce energy and water use

through design; and encourage the use of renewable/low carbon technology as appropriate. There is no alignment between the two policies, the latter of which stipulates the requirement to provide 10% of all energy needs from renewable resources. Consistency between both policies is required.

Policy ENV8 – Environmental and Amenity Protection

- 5.47 Policy ENV8 states that proposals for sensitive end uses which include residential are not desirable to those located in areas of poor air quality, or in noise sensitive areas. However, **it is unclear how this correlates with the Council’s intentions to deliver large-scale** development within the town centre in air and noise sensitive locations. The Policy also states that in (16) that additional guidance in support of the Policy will be provided in the Design and Construction and Environmental Protection SPDs. It is our view that there is duplication in relation to the Policies DC6 and ENV8, and the SPDs, and there is no requirement for the contents of the Policy to be reiterated in the various policies.

Site Allocations

Site Allocations MD1 – OS8

- 5.48 No comment.

Policy OS9 – Land to the north of Winwick

- 5.49 Land to the north of Winwick is proposed to be removed from the Green Belt and allocated for a minimum of 130 homes.

- 5.50 **The justification for the release of the site was derived from the Council’s Green Belt** Assessment undertaken by Arup in October 2016, with subsequent updates published in July 2017. It is our **Client’s maintained** position that the Green Belt Assessment, namely its general approach and methodology, is flawed on the following basis:

- The land parcels assessed are inconsistently defined, with some utilising roads as boundaries whilst others relate to field boundaries;
- The Assessment itself was not undertaken by those who defined its methodology, instead several Officers were briefed and undertook the Assessment individually. Whilst this allowed for local knowledge within the Assessment, it has also provided the opportunity for a level of divergence with the intended approach;
- The Assessment fails to consider parcels relating to settlements in neighbouring authorities in the same way it does settlements within Warrington. This has the overall effect of some parcels towards the edge of the Borough identified as

making a lesser contribution to the Green Belt, despite being located on the edge of major settlements outside Warrington;

- The Assessment fails to fully consider existing urban influences on a site and how this influences the character of each assessed parcel, especially when determining openness and the restriction of urban sprawl;
- The Assessment fails to consider the potential for a development to create a new prominent and permanent edge to the settlement;
- The consideration of openness is not clearer explained. 30% built form on-site is assessed significantly different to 10% despite the fact that there could be little difference between the two and its impact on the perception of openness depending on the scale of the wider parcel; and
- It is unclear how the overall conclusions of the Assessment have been reached. The Assessment outlines a standardised weighting which is applied based on the significance of the impact observed for each Green Belt purpose. In our view a more bespoke approach is required, with the Assessment weighted towards the purposes of the Green Belt which the parcel more closely relates to.

5.51 Within the **Council's** Green Belt assessment, the site (SHLAA Ref: 2670/Site Ref: R18/040) is assessed as making a "*moderate contribution*" to the Green Belt. Our Client disagrees with this conclusion, and set out our assessment of the site against the five purposes of the Green Belt below in Table 5.

| | |
|---|---|
| <p>To check the unrestricted sprawl of large built-up areas</p> | <p>The site will form an extension to the existing settlement of Winwick to the north and is not well related to the settlement, and does not form a natural rounding of the settlement as its development abuts the natural settlement boundary line. Furthermore, it is not well-connected to the settlement boundary on the basis that it is only bounded by the existing built up area on one side (i.e. to the rear of Spires Garden) plus there is a distinct separation from the site to the settlement boundary because of the large plot sizes relating to the land to the south. Whilst the roads create natural boundaries to the east (Waterworks Lane) and west (Golborne Road) the field boundary to the north does not create a good barrier between existing development and undeveloped land, and will result in the precedent for unrestricted urban sprawl – as the boundary to the north is</p> |
|---|---|

| | |
|---|---|
| | not strong. As such, it is considered that the site will contribute to urban sprawl, and makes a <i>moderate contribution</i> to this purpose. |
| To prevent neighbouring towns merging into one another | The development of the site would extend the settlement further north than the current settlement boundary as formed by existing housing development along Spires Gardens, and the northern boundary to the site is not strong, particularly given the openness of the wider land parcel to the north of the site. Whilst it will not result in the merge with the nearest settlement (Newton le Willows) to the north, it raises concerns over the impact on the open nature of the site on the wider visual landscape. It is considered that this fulfils a <i>weak contribution</i> to this purpose. |
| To assist in safeguarding the countryside from encroachment | <p>The release of the site would result in further opportunities for development. The boundary of the site which would be created is not a nature edge to the settlement, and would not result in the rounding of on the settlement boundary. It is our Client's position that this site fulfils a clear function in assisting in safeguarding the settlement from encroachment, a position which has been confirmed within the Council's own Green Belt assessment of the Site. The release and development of this site would result in the settlement extending north, well beyond the existing built-up area.</p> <p>Due to the large field pattern and the open, flat nature of the land in this location, it is not considered that the development of circa 132 dwellings could be accommodated in this area without the provision of a new, prolonged settlement boundary and the creation of an unnatural extension to the field boundary. This would significantly weaken the definable edge of Winwick leading to pressure for future land release in this location. On this basis it is considered that the Site is not deemed to be appropriate, and makes a <i>strong</i> contribution to the Green Belt.</p> |
| To preserve the setting and special character of historic towns | Development of the site would not conflict with this function of Green Belt. |
| Assist in urban regeneration, by | The need for Green Belt release has been established by virtue of the Council's assessment that there is insufficient |

| | |
|--|--|
| encouraging the recycling of derelict and other urban land | urban land to meet the Council's emerging housing requirements over the Plan period. |
|--|--|

Table 5 – Assessment of Land to the north of Winwick against Green Belt purposes

- 5.52 Furthermore, the SHLAA has previously concluded that the site is constrained in terms of proximity to GP services and natural greenspace; is located with Groundwater Source Protection Zone 1; is in close proximity to a historic landfill with potential for contamination; and that pylons run across the site. Notwithstanding these issues, the Council has concluded that the proposed housing allocation and future development of the site is acceptable on the basis that it can accommodate the identified housing requirement for Winwick (130 dwellings). The site's capacity is identified as 132 dwellings, albeit on 4.4 ha of the site has been assessed as deliverable. These on-site constraints, coupled with our concerns with the impact on the 5 purposes to the Green Belt raises significant concerns with the deliverability of the site.
- 5.53 **As such, it is our Client's position that this is not the most suitable site for allocation** within the emerging Local Plan and that other sites should be considered. We set out our position in relation to this in Section 7 of this response.

6.0 COMMENTS ON EVIDENCE BASE

6.1 This following Section sets out our response to the associated evidence base for the Local Plan, which are cross-referenced with Section 2 of this Statement.

Viability Study

6.2 **An assessment of the Plan's Viability Study** has been undertaken by BNP Paribas and Cushman and Wakefield. The Study, most notably the one prepared by Cushman and Wakefield, raises concerns that a number of the sites are unviable particularly as part of the Town Centre regeneration schemes i.e. Waterfront Parcel 2 - 4 (250 units in each parcel). This raises significant concerns over the deliverability and viability of a number of these sites, and whether all affordable housing contributions (20%) can be delivered on-site. It is also unclear as to whether all the abnormalities (as required through the IDP and set out below) have been fully taken into account. As such, coupled with our concerns regarding the viability of the IDP, results in significant concerns in relation to the **deliverability of a number of the Council's** sites. This is of paramount importance and should be read in conjunction with our comments in relation to Policy INF5.

Infrastructure Plan

6.3 Our Client acknowledges the requirement for infrastructure improvements to facilitate new development, and we refer to our comments provided in relation to contributions in Section 4 of this Statement.

6.4 As noted earlier, CIL is not yet in place in Warrington. The Submission Version indicates at paragraph 3.3.32 that the Council will consider the introduction of CIL immediately following the adoption of the Local Plan. However, Policy INF5 does not specify when or if this will be introduced, rather the supporting text refers to **"should the Council introduce it"**. No reference is made in the IDP or Viability Appraisal to the introduction of CIL; accordingly, clarification on the Council's **approach to CIL** is required given that this will impact on the contributions and infrastructure required through the IDP.

6.5 A number of proposed works are assigned indicative costs and funding. Equally however, it is noted that a number of schemes, such as the M62 capacity and junction improvements, and M6 capacity improvements, whilst assigned to be delivered through Policy INF1 – sustainable travel and transport, do not.

6.6 Furthermore, in the instances where indicative costs have been provided, and funding is confirmed, there are a number of instances where there are substantial funding gaps, such as in relation to Flood Risk Management, which has an indicative cost of £14,300,000

but only £500,000 funding has been confirmed, with a funding gap of £13,800,000 which the Council envisages will be delivered by the Environment Agency, United Utilities and WBC contributions. There can be no guarantee of this source of supply, particularly when public body resources are being stretched. Accordingly, much greater certainty and evidence needs to be provided prior to the adoption of the Local Plan.

- 6.7 Additionally, it is noted that out of circa 160 infrastructure projects and elements to be delivered, there is in excess of a £1.54 billion funding gap required to bring forward these identified schemes; it is unclear how this gap will be met.

Urban Capacity Statement

- 6.8 **An assessment of the Council's Urban Capacity has been undertaken, specifically in relation to the Town Centre regeneration areas, and is discussed in detail in Section 4 of this Statement.**

SHLAA

- 6.9 **An assessment of the Council's SHLAA has been undertaken and is discussed in detail in Section 4 of this Statement.**

Options and Site Assessment Technical Report

- 6.10 This Report **sets out the Council's development options and site assessments. This is largely discussed in relation to housing requirements in Section 3 of this Statement in relation to housing requirements and spatial distribution.**

Green Belt Study

- 6.11 We refer to our comments provided in Section 5 of this representation and our conclusions that the Green Belt Assessment, namely its general approach and methodology, is flawed on the following basis:

- Land parcels assessed are inconsistently defined, with some utilising roads as boundaries whilst others relate to field boundaries;
- The Assessment itself was not undertaken by those who defined its methodology, instead several Officers were briefed and undertook the Assessment individually. Whilst this allowed for local knowledge within the Assessment, it has also provided the opportunity for a level of divergence with the intended approach;
- The Assessment fails to consider parcels relating to settlements in neighbouring authorities in the same way it does settlements within Warrington. This has the

overall effect of some parcels towards the edge of the Borough identified as making a lesser contribution to the Green Belt, despite being located on the edge of major settlements outside Warrington;

- The Assessment fails to fully consider existing urban influences on a site and how this influences the character of each assessed parcel, especially when determining openness and the restriction of urban sprawl;
- The Assessment fails to consider the potential for a development to create a new prominent and permanent edge to the settlement; and
- The consideration of openness is not clearer explained. 30% built form on-site is assessed significantly different to 10% despite the fact that there could be little difference between the two and its impact on the perception of openness depending on the scale of the wider parcel.

6.12 It is unclear how the overall conclusions of the Assessment have been reached. The Assessment outlines a standardised weighting which is applied based on the significance of the impact observed for each Green Belt purpose. In our view a more bespoke approach is required, with the Assessment weighted towards the purposes of the Green Belt which the parcel more closely relates to.

7.0 SITE PROMOTION – HOLLINS LANE, WINWICK

7.1 As the Council is aware, our Client has been promoting their existing land interests north of Hollins Lane, Winwick as a housing allocation through the emerging Local Plan. The extent of the Site subject to this promotion is shown in Figure 1 below:



Figure 1: Land off Hollins Lane, Winwick

7.2 **The Site was submitted to the Council’s ‘Call for Sites’ exercise in November 2016. The submission outlined briefly our Client’s view that the Site represents a sustainable location for development, and is considered available, suitable and deliverable for housing within the short-term. The Site was again promoted through the emerging Local Plan in September 2017.**

7.3 The Site is located to the north-west of Winwick, occupying a single field located to the north of Hollins Lane and west of Newton Road. The Site extends to 6.59 hectares and is bordered to the south by existing residential development, and to the north and east by an existing tree belt. Beyond this tree belt to the east (and partially to the north) lies the further built-up area of Winwick, with the village centre lying around 500m to the

east of the Site. To the west of the Site lies open countryside, with more distant views limited by changes in topography, intermittent vegetation and existing structures.

- 7.4 An existing public footpath runs within the western boundary of the Site providing a pedestrian connection between Hollins Road and Newton Road. The 329 bus service operates along Hollins Lane, providing a half-hourly service to Warrington and St Helens. There are two stops for services westbound and one stop for services eastbound along the Site frontage. Further bus provision (no. 360 Warrington to Wigan and no. 22 Warrington to Newton-Le-Willows Bus Services) is available within a short walking distance of the Site on Newton Road.

Site Specific Assessment

- 7.5 A Site Layout Plan has been prepared as part of the promotion of the Site. This layout plan builds upon the principles established within the accompanying Development Framework Document prepared in response to the 2017 consultation.
- 7.6 The Layout Plan confirms that the Site is able to accommodate 100 dwellings, based on an indicative mix of 2 – 4 bedroom properties, at a minimum density of 38 dph.
- 7.7 In the consideration of the Site Layout Plan, the following principles have informed the development:
- A circular looped walk through landscaped areas of public open space is a key driver of the scheme, and is reflective of the parkland to the south to aid orientation, linkages and the enhancement of PROW through carefully considered pedestrian links;
 - Clear character zones within the scheme are reinforced by density and step down towards POS / open landscape to give a rural edge to the development. This is further reinforced through the use of private drives;
 - Development blocks have been positioned in response to the topography;
 - Existing landscape features will be retained and incorporated into the green infrastructure network;
 - Vehicular access via Hollins Lane;
 - A range of housetypes will be provided across the site; with all properties arranged to face out onto street or POS whilst corner units designed to be double fronted for security/ sense of place;
 - Key vistas within the development terminated with focal 2.5 storey buildings where appropriate.

- New streets have been designed to prioritise pedestrians and creating clear road layouts for vehicles;
- Pedestrian and cycle connections will be provided;
- Provision of green spaces and infrastructure;
- Vehicular access via Hollins Lane;
- Sustainable drainage features, including swales and attenuation ponds; and
- Boundary treatments to the west of the site.

Suitability for Release from the Green Belt

7.8 **The Council’s Green Belt Assessment was** prepared by Arup in October 2016, with subsequent updates published in July 2017. The Green Belt Assessment has appraised the Land at Hollins Lane, Winwick for its role in meeting the five purposes of the Green Belt as defined by Paragraph 134 of the NPPF. This was assessed through Parcel reference W13, and which concluded that the Site fulfils a strong contribution to the Green. Our Client maintains their objection to this Assessment and disagrees with the **Council’s conclusions. Instead, they** consider that the Site represents the leading candidate Green Belt land to be released for housing around Winwick.

7.9 **We set out our assessment of our Client’s site** below.

| Purpose | Criteria and Definitions | Assessment | Conclusions |
|--|---|---|--|
| 1. Check the unrestricted sprawl of large built-up areas | Would development of the Site lead to/constitute ribbon development? | No. The Site forms a distinct parcel which is well related to the existing settlement. The Site offers a logical rounding off of the settlement to the north west of Winwick. | The Site does not adjoin a large built-up area and provides for a logical option to extend the settlement edge of Winwick. The Site does not therefore serve to prevent unrestricted urban sprawl. |
| | Would development result in an isolated Site not connected to existing boundaries? | No. The Site adjoins the existing urban extent of Winwick. | |
| | Is the Site well connected to the built-up area? Does it have 2 or more boundaries with the existing built-up area? | Yes. The Site is bounded on two sides by existing developed parts of Winwick. | |

| Purpose | Criteria and Definitions | Assessment | Conclusions |
|--|---|---|--|
| | <p>Would development of the Site effectively "round off" the settlement pattern?</p> | <p>Yes. The Site would round off this part of Lymm reflecting the broad extent of the existing settlement to the north and west.</p> | |
| | <p>Do natural and physical features (major road, river etc) provide a good existing barrier between the existing development and undeveloped land, which if breached may set a precedent for unrestricted sprawl?</p> | <p>The Site is defined on two sides by existing urban form/road infrastructure. The third and final boundary is formed by an existing hedgerow which has the opportunity to be strengthened through the design process.</p> | |
| <p>2. Prevent neighbouring towns merging</p> | <p>Do natural features and infrastructure provide a good physical barrier or boundary to the Site that would ensure development was contained?</p> | <p>The Site is defined on two sides by existing urban form/road infrastructure. The third and final boundary is formed by an existing hedgerow which has the opportunity to be strengthened through the design process.</p> | <p>Development of the Site would not result in the merging of settlements.</p> |
| | <p>Would development of the Site lead to physical connection of two or more settlements?</p> | <p>No, the nearest settlement is Newton-Le-Willows which is located approximately 1.5km to the North West. There is no visual or perceptible connectivity between the two settlements given the extent of remaining open agricultural land, and intervening vegetation.</p> | |
| | <p>Would the development of the Site help preserve the physical separation of</p> | <p>Yes. The Parcel benefits from greater levels of enclosure from its surrounding features than potential alternatives</p> | |

| Purpose | Criteria and Definitions | Assessment | Conclusions |
|---|--|---|---|
| | settlements across the district? | adjacent to Winwick. The indicative capacity of 90 dwellings as set out in the Local Plan could be incorporated within the logical boundaries of the site without need for the creation of artificial boundaries to the settlement. The Parcel also would promote the coalescence of Winwick with the Warrington Urban Area as demonstrated by alternatives to the south of the settlement. | |
| 3. Assist in safeguarding the Countryside from encroachment | Is there a strong, defensible boundary between the existing urban area and the Site – wall, river, main road etc (as opposed to garden boundaries) | Two existing roads provide the existing boundaries of the Site, and whilst it is acknowledged that these provide strong boundaries to the settlement as existing, an equally strong boundary could be created to the north/west of the Site allowing the sensitive rounding off of the existing settlement pattern. | The Site is acknowledged to fulfil a moderate role in this function, however can be developed to ensure that remaining agricultural land is safeguarded from development. |
| | Does the Site provide access to the countryside – footpaths, bridleways across the land, or is it designated park/green space? | No. The Site is in agricultural use and as such is not accessible to the public. | |
| | Does the Site include national or local nature conservation designation areas? | No. There are no designated ecological sites or sites of nature conservation within or adjacent to the Site. | |

| Purpose | Criteria and Definitions | Assessment | Conclusions |
|--|--|---|---|
| | Does the Site include areas of woodland, trees, hedgerow that are protected (protected ancient woodland) or significant unprotected tree/hedge cover? | There are no trees within the Site. Trees and hedgerow are concentrated towards the boundaries of the Site. The Site can be developed retaining the majority of these features save for access. | |
| | Does the Site includes any best and most versatile grade 1, 2, 3a (where known) agricultural land? | Unknown. Large parts of the Borough however are either Grade 2, 3a or 3b. | |
| | Does the Site contain buildings? | No. | |
| 4. Preserve the setting and special character of historic towns. | Winwick is not recognised as a settlement of historical importance and as such the Green Belt is not considered to serve this purpose in this location. The Site is near the Parish Church of Winwick but due to thick existing vegetation there is very limited to no visual connectivity between the Site and the Church and the Site is not considered to form part of its setting. | | Development of the Site would have no effect on the setting and special character of a historic town. |
| 5. Assist in urban regeneration, by encouraging the recycling of urban/derelict land | N/A | No. The Site is promoted as a suitable Site for housing for Green Belt release to meet the future housing needs of Warrington. The Council has identified insufficient brownfield capacity to meet these needs. The release and allocation of this site would pick up this shortfall against identified needs and therefore will not conflict with the Council's regeneration strategy . | Development of the Site would not have any impact on the regeneration of the Borough. |

Table 6 – Assessment of Land north of Hollins Lane, Winwick against Green Belt purposes

Position in relation to Council's Assessment of Site

7.10 As identified in Sections 5 and 6 of this representation, our Client has concerns with the approach and methodology applied by the Council in the preparation of its Green Belt Assessment.

7.11 In relation to the Assessment undertaken for Hollins Lane, Winwick our Client agrees with the conclusions made for the following purposes:

➤ *Check the unrestricted sprawl of large built-up areas: No Contribution –*

This is on the basis that the Site is not adjacent to the Warrington urban area and therefore does not contribute to this purpose. Further, the release of the Site would not lead to the unrestricted sprawl of Winwick given that the Site is well-contained by existing natural features and permanent infrastructure; and

➤ *Preserve the setting and special character of historic: No Contribution –*

The Site is not adjacent to a historic town. The Site does not cross an important viewpoint of the Parish Church.

7.8 Our Client continues to question the conclusions made for "*Preventing coalescence between two towns; safeguarding the countryside from encroachment; and assisting in urban regeneration*".

7.9 We address each in turn below.

Preventing coalescence between two towns

7.10 In relation to coalescence, whilst it is acknowledged that the Site is situated between Winwick and Newton-Le-Willows, it is our position that existing topography and intervening vegetation means that there is an absence of any visual connection between the Site and Newton-Le-Willows, which is situated outwith the Borough in neighbouring St Helens. It is noted that the Site is not visible from Newton Road and as such its development would not result in the perception of Winwick expanding towards Newton-Le-Willows. The Site cannot and should not be considered to form part of an important settlement gap and its release would relieve pressure to development more sensitive sites around Winwick which do contribute towards this Green Belt purpose. It is **considered that the Site makes "No Contribution" to this Green Belt purpose.**

Safeguarding the countryside from encroachment

7.11 In relation to encroachment, it is accepted that the Site is currently open from development and forms a functioning part of the open countryside, and as such its development for housing would lead to the loss of the countryside. This is the case for

any Green Belt site and a position which has been accepted by the Council in the need for further housing land and the case for Green Belt release on a Borough-wide level. The release of this Site for development would provide for a logical rounding-off of the settlement in this location; to this end, the settlement boundary of Winwick should be amended as part of the Local Plan process in order to incorporate the former hospital to the south which has been redeveloped for housing (and which no longer needs to be designated as Green Belt land). This logical amendment in turn lends considerable **support to the release and development of our Client's land interests as a logical rounding-off of Winwick settlement.**

- 7.12 The release and development of the Site would not advance the built-up area of Winwick any further north or west than the existing extent of the settlement to the east. Only a single boundary of the Site current lacks definition, and there is the opportunity through the scheme design to create a new defensible western edge to the settlement utilising the route of the existing footpath as a means to define this which has been reflected in the proposed design of the scheme. Accordingly, our Client considers that the Site fulfils a **"Moderate Contribution" when assessed against this Green Belt purpose.**

Assisting in urban regeneration

- 7.13 In relation to urban regeneration, our Client objects to the conclusion that the Site has a **"Moderate Contribution"**. The Council has undertaken an assessment of its considered urban capacity through the Plan preparation process and has concluded that there is an insufficient supply of available, deliverable, and achievable non-Green Belt land within the Borough on which to meet its identified housing requirement. As such, the exceptional circumstances required by national planning policy to review and release land from the Green Belt have been demonstrated. As a result, our Client considers that **the Site makes "No Contribution" to this Green Belt purpose.**

- 7.14 Taking into account the above, our Client considers that the conclusions of the Green Belt Assessment should be amended to conclude that the Site makes a Moderate Contribution to the Green Belt at the most, and therefore forms one of the most appropriate locations for Green Belt releases immediately adjoining the settlement boundary.

Summary of **Site's Suitability for Development**

- 7.15 The Site is capable of providing a logical extension to the settlement with clearly defined and durable boundaries. The development of this Site would not compromise the integrity of the surrounding landscape, moreover, as set out above, the development

would lessen development pressures elsewhere in the area in more sensitive locations, thus helping to preserve the openness of the Green Belt as a whole.

- 7.16 The Site is adjacent to the existing urban edge of Winwick, located to the north of Hollins Lane and west of Newton Road. The Site is well related to the existing settlement and would provide for a logical rounding off of Winwick in this location, with this northern and western boundary to the development reflecting the current extent of the built-up area of Winwick. It is clear from the Sustainability Assessment set out earlier in the Framework that the Site is located close to a number of existing facilities within Winwick.
- 7.17 The Site is accessible to a public transport route along Newton Road. Frequent Bus Services operate to Warrington Town Centre and Newton-Le-Willows where there is a wider range of services and employment opportunities. There are also further rail connections in both to Manchester and Liverpool.
- 7.18 The development of the Site will continue to provide an attractive and accessible residential area as well as to help safeguard and enhance the vitality and vibrancy of Winwick. The allocation of the Site will also assist the Council meet its wider housing needs which have been defined in response to latest evidence of demographic, affordable and economic needs.

Overall Conclusions from Green Belt Assessment in relation to the Site

- 7.19 National Planning Policy acknowledges that in order to fulfil housing requirements, a review of the Green Belt may be necessary. As shown within the Preferred Development Option Local Plan, the Council is clearly of the view that the circumstances of housing need and supply justify the need to review the Green Belt boundaries around Warrington.
- 7.20 Winwick is recognised by the Council as a sustainable settlement, and one which is both capable and in need of further housing growth. Due to the constrained nature of the settlement there will be a need to release land from the Green Belt in response to this context. The Site fulfils a limited role within the Green Belt, and is capable through careful design of safeguarding the countryside from encroachment. The Site will provide for a sustainable development and provide for a scale of growth which is appropriate for the Site and the wider settlement. The development of the Site will support the **delivery of the Council's housing requirement, and with help maintain the vitality and vibrancy of Winwick.**

8.0 CONCLUSIONS

8.1 The Warrington Local Plan sets out the strategic approach to development within the Borough between 2017 and 2037, and sets out a 20-year plan for the Borough.

8.2 Our Client, Miller Homes is supportive of the production of the Local Plan, and in general the overall approach taken by the Council in relation to the need to release Green Belt land to meet **Warrington's** overall housing requirements.

8.3 Notwithstanding this, our Client has a number of concerns with the Local Plan as drafted, and do not consider that in its current draft, that it can be found sound.

8.4 Our concerns with the Plan as drafted are:

- The Council should plan for a higher level of growth.
- The Plan does not fully take into account affordable housing needs, and a requirement of 1,000 dpa representing a 10% uplift to affordable housing provision to the OAN would be appropriate.
- There is an over-reliance on the amount of housing which will be delivered within the urban area particularly in relation to the strategic sites.
- Our Client has significant concerns regarding the availability and deliverability of urban sites within the Town Centre and the Waterfront area as well as the anticipated deliver rates for the South West Extension and Garden Suburb given the lead-in times for delivery and their proximity to one another.
- There is a need to increase the amount of housing proposed in the outlying settlements such as Winwick.
- There is a significant shortfall in the overall housing land supply. To ensure the Council meets their proposed housing requirement of 19,100 dwellings, land for an additional 1,944 dwellings need to be identified within the Local Plan. However, as set out above, the Council should seek to provide 10% flexibility in their supply to allow for non-implementation.
- Overall, the Council will, therefore, need to identify additional land to deliver 3,834 dwellings over the Plan period.
- Considering alternative scenarios, based on the LHNA upper limit of 19,100 dwellings (955dpa) with a 10% allowance for flexibility in the supply the Council would need to identify an additional 4,054 dwellings. Based on a higher uplift to 20,000 dwellings (1,000dpa) which includes a 10% uplift for affordable housing

the Council would need to identify an additional 5,044 dwellings over the Plan period with a 10% allowance for flexibility in the supply.

- There is an urgent need for the Council to allocate additional land within the Local Plan, which is suitable, available and deliverable and will help to meet the housing needs of the Borough. Considering our concerns regarding the deliverability of urban sites within the Town Centre and at the Waterfront, the Council needs to consider the release of further Green Belt sites to deliver lower density family housing.
- 1,288 dwellings should be removed from this supply resulting in an overall five-year supply of 2,844 dwellings. The removal of 2,844 dwellings from the first five years of the Plan will result in the delivery of these dwellings being pushed back towards the middle and end of the Plan period. This has potentially serious implications for the Council in meeting their short-term housing needs as well as maintaining a five-year housing land supply particularly given the stepped approach to housing delivery. As such, alongside a robust mechanism to secure a review of the Plan every five years, the Council needs to allocate additional land within the Warrington Local Plan, which is suitable, available and deliverable in the short-term to ensure these needs are met.
- **It is our position that our Client's land interests at Hollins Lane, Winwick is the most suitable and sustainable site for development within Winwick.**

8.5 On the basis of the above, our Client has concerns with the Plan as drafted and object to the proposed spatial strategy and related policies, and do not consider it to be sound on the basis that it fails to meet the tests set out in Paragraph 35 of the NPPF.

Appendix 1 – Site Layout Plan



| House Type | Beds | No | SQ Ft | Total Sqft | % | Required % |
|-----------------------|------|------------|-------|---------------|---|------------|
| Apartment | 2B3P | 36 | 555 | 19980 | | 22 |
| 203C | 2B4P | 17 | 737 | 12529 | | 10 |
| 303C | 3B5P | 13 | 819 | 10647 | | 8 |
| 304N | 3B5P | 16 | 831 | 13296 | | 10 |
| 305T | 3B5P | 9 | 869 | 7821 | | 5 |
| 308M | 3B5P | 12 | 972 | 11664 | | 7 |
| 403N | 4B7P | 6 | 999 | 5994 | | 4 |
| 405N | 4B6P | 6 | 1045 | 6270 | | 4 |
| 408C | 4B7P | 10 | 1178 | 11780 | | 6 |
| 409M | 4B7P | 2 | 1219 | 2438 | | 1 |
| 411N | 4B8P | 5 | 1269 | 6345 | | 3 |
| 412M | 4B7P | 15 | 1297 | 19455 | | 9 |
| 414M | 4B8P | 7 | 1342 | 9394 | | 4 |
| 416N | 4B8P | 11 | 1400 | 15400 | | 7 |
| Total | | 165 | | 153013 | | 100 |
| % 2Bed | 2B | | | | | 32.1 |
| % 3Bed | 3B | | | | | 30.3 |
| % 4Bed | 4B | | | | | 37.6 |
| Dwellings per Hectare | | 38.64 | | | | |

developable area 4.27 hectares

Appendix 2 – Development Plan Framework Document

LAND NORTH OF HOLLINS LANE, WINWICK

DEVELOPMENT
FRAMEWORK



SEPTEMBER 2017

**BARTON
WILLMORE**

millerhomes

EXECUTIVE SUMMARY AND CONTENTS

This Development Framework has been prepared by Barton Willmore on behalf of Miller Homes. It demonstrates how land north of Hollins Lane, Winwick, Warrington (the Site) represents a sustainable location for a new residential development to meet the future housing needs of Warrington Borough.

Warrington Borough Council is currently preparing a new Local Plan which will set out planning policies and preferred sites to guide future development in the Borough. The Council acknowledges that greenfield land will be required to meet future development needs including those areas which are currently designated as Green Belt.

The Site is located to the west of Winwick and is currently designated as Green Belt. At this time, Winwick is significantly constrained by the wider Green Belt. However, given the need to release Green Belt land across the Borough, we consider that the Site, by virtue of its limited contribution towards the Green Belt, can be developed without harming the overall integrity of the Green Belt to the west of Winwick.

Winwick is identified as an Outlying Settlement within the emerging Warrington Local Plan, one of six settlements identified as housing capacity to accommodate future development within the Green Belt. Accordingly, this document demonstrates how the Site can contribute towards a sustainable extension to Winwick, boosting and securing housing delivery in response to local and wider needs. It demonstrates how the Site occupies a sustainable and accessible location, with the potential to help strengthen local pedestrian and cycling routes, delivering improvements in local sustainable accessibility.

This document presents an Concept Masterplan and supporting design principles to demonstrate our Client's emerging design rationale for the Site. This has been informed by an initial assessment process of the Site and its surrounds to demonstrates the ability of the Site to accommodate approximately 120 dwellings, alongside improved pedestrian and cycle links and public open space.

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M6

A49

WINWICK

Hollins Lane

Hollins Park Hospital

A24

M62

SITE LOCATION AND DESCRIPTION

SITE LOCATION

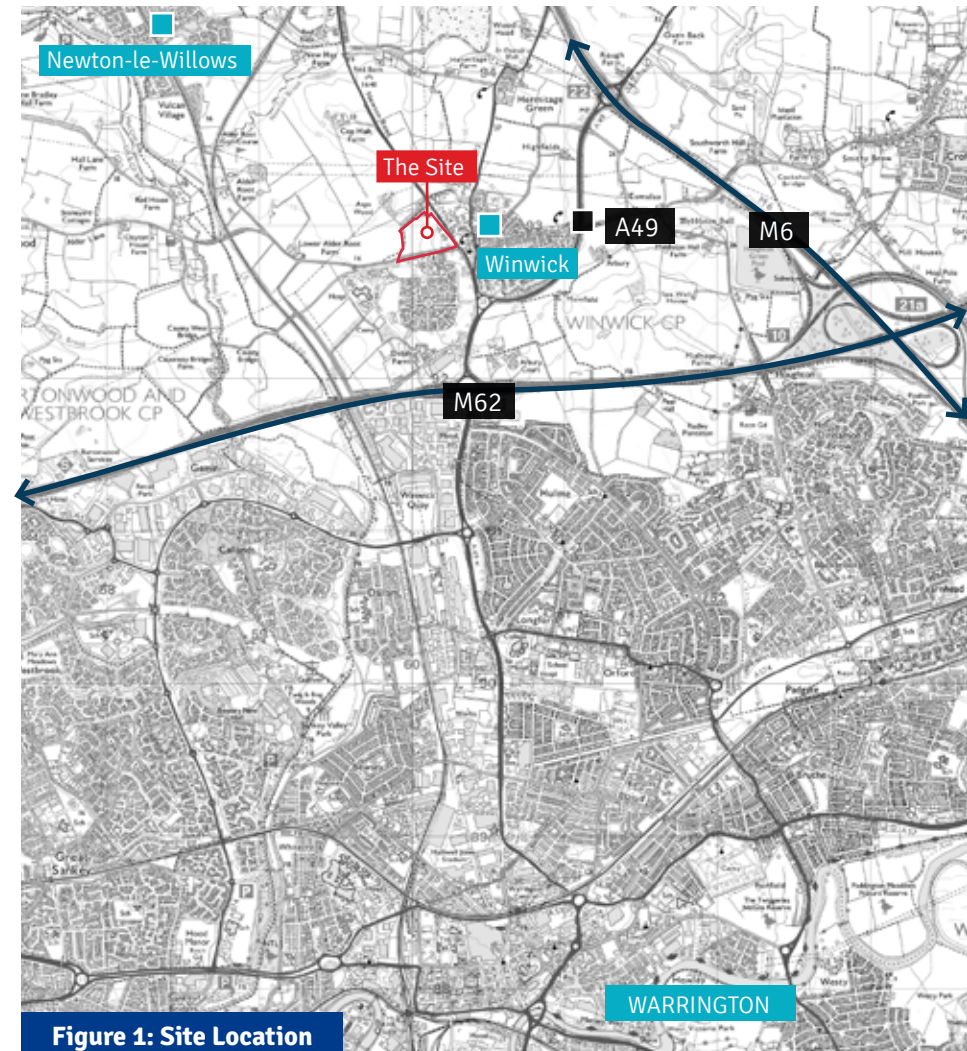
The Site lies to the west of Winwick, within the administrative area of Warrington. The Site is located approximately 1.5km from Junction 22 of the M6 and c.1km Junction 9 of the M62. Warrington Town Centre is c.5km to the south and is directly accessible via the A49.

SITE DESCRIPTION

The Site comprises an agricultural field to the north of Hollins Lane and to the east of Newton Road. It extends to an area of c.7.2 hectares and slopes gradually from north-east to south-west.

The Site is framed to the east and south by existing highway infrastructure, dominant landscape features and existing residential development. The eastern boundary is defined by established trees and scrub planting, beyond which lies the A49 (Newton Road) and residential development comprising large properties set within generous plots. The southern boundary is defined by an established hawthorn hedgerow and mature trees. Hollins Lane runs adjacent to the southern boundary, with 19th Century terraced residential properties overlooking the Site. To the rear of these properties is an area of more recently built residential development and Hollins Park Hospital, which extends the settlement south towards the M62.

To the west and north-west of the Site lies open farmland. The western boundary includes a group of established trees and the northern boundary is framed by mature trees and several residential dwellings (Cop Holt Cottages and Newton Road Cottages). An existing Public Right of Way runs adjacent to the western and northern boundary, providing access to nearby residential development and the surrounding open countryside.



— Site Boundary



A49 (Newton Rd)

Newton Rd Cottages

Cop Holt Cottage

WINWICK

Hollins Lane

Winwick Link Rd

Hollins Park Hospital

A24

Elysium Healthcare

M62

WINWICK QUAY

HULME

LONGFORD

Figure 2: Site Aerial

GREEN BELT ASSESSMENT

SITE DESCRIPTION

The Warrington Green Belt is contiguous with the Merseyside, Greater Manchester, and North Cheshire Green Belts. Winwick is a free standing, sustainable settlement located to the north of the Warrington Urban Area and North of the M62. The Green Belt at Winwick wraps tightly around the Settlement, closely following the settlement boundary as defined within the Warrington Core Strategy. The settlement, as with all other rural parts of the Borough, is tightly constrained by the Green Belt.

Warrington Borough Council has recently commenced the preparation of a new Local Plan which will define the future development requirements of the plan area and identify the strategy to secure its delivery. The Local Plan is underpinned by updated evidence which suggests a significant uplift in housing need and subsequently an urgency for further development sites. The Council's assessment of its land capacity has shown a shortage of available, deliverable and achievable non-green belt land in contrast to identified requirement, necessitating the need for a review and release of land from the Green Belt for development.

In October 2016 the Council published a Green Belt Assessment which assessed identified land parcels for their contribution to the Green Belt with reference to the five purposes of the Green Belt as defined under

Paragraph 80 of the NPPF. This review has since been updated in response to Call for Sites submissions through the July 2017 update. The Site is assessed through the former under Site reference W13, adopting the same site boundary as that promoted through this Development Framework.

The Council's Green Belt Assessment concludes that the Site makes a Strong Contribution to the Green Belt. This is on the basis that the Site is adjudged to support a strong degree of openness and not all boundaries between the parcel and the countryside are durable. As a result the Site is considered to fulfil a strong role in preventing encroachment into the countryside and is therefore concluded to have a strong contribution to the fundamental aim of the Green Belt under Paragraph 79 of the NPPF.

We disagree with the conclusions of the Green Belt Assessment. This is because the Assessment fails to take into account the opportunity provided through the development of the Site to provide for a new durable but natural boundary to the settlement edge to the north and west of the Site, which reflects that of the wider settlement, and which would provide for a logical and well related rounding off of the settlement. The scale of the Site means that it is better suited to accommodating the level of growth sought by the Council at Winwick through its Preferred Development Option

Consultation Document without needing to create protracted artificial boundaries to the settlement.

Examining the Council's conclusions on each of the five Green Belt purposes, it is agreed that:

- The Site fulfils no contribution to check the sprawl of urban areas; and
- The Site fulfils no contribution to the setting of historic towns.

We disagree that Site plays a weak role in preventing the coalescence of two towns, and consider it to play no role. Although the Site is acknowledged to sit within the existing gap between Winwick and Newton-le-Willows, due to local topography and intervening vegetation there is an absence of a visual or perceptive connection between the Site and Newton-le-Willows. The Site would not therefore be considered to form as part of an important settlement gap, and its release for development would override the pressure to development more sensitive land to this purpose which is located to the south of Winwick and close to the Warrington Urban Area.

Whilst it is acknowledged that the Site fulfils a role in preventing encroachment into the open countryside – given its open nature – we disagree that this is a strong role taking into account the wider settlement pattern and relative contained nature of the Site. It is

considered that the development of the Site would not lead to further pressures for Green Belt release in this location.

We dispute the assessment that the Site fulfils a moderate contribution to assisting in urban regeneration. This is based on the conclusion made by the Council that there is an insufficient supply of available, deliverable and achievable brownfield land within the Borough to meet its assessed housing needs. The significance of this housing need, together with the constrained nature of the Borough, necessitates the need for Green Belt release. No sites should therefore be found to fulfil this Green Belt purpose.

Whilst the Site clearly makes a contribution to the openness and function of the Green Belt, we consider that function is limited by the factors above. When considered in the context of the Green Belt as a whole, the need for Green Belt release within the Borough, and the need to support a sustainable pattern of development, we consider that the Site provides for the best opportunity to deliver a sustainable, high quality and sensitive expansion to the existing settlement at Winwick. As with any settlement which is tightly constrained by Green Belt, the encroachment of the countryside is an inevitability of the release of undeveloped land for residential development. We consider that the Site provides a logical extension to the settlement

which will allow for a sensible rounding off of Winwick, and will not encourage the further expansion of the settlement in this location in the future. The Site therefore is suitable for release from the Green Belt as a potential housing allocation.

| PURPOSE | CRITERIA AND DEFINITIONS | ASSESSMENT | CONCLUSIONS |
|--|---|---|--|
| 1. Check the unrestricted sprawl of large built-up areas | Would development of the Site lead to / constitute ribbon development? | No. The Site forms a distinct parcel which is well related to the existing settlement. The Site offers a logical rounding off of the settlement to the north west of Winwick. | The Site does not adjoin a large built-up area and provides for a logical option to extend the settlement edge of Winwick. The Site does not therefore serve to prevent unrestricted urban sprawl. |
| | Would development result in an isolated development Site not connected to existing boundaries? | No. The Site adjoins the existing urban extent of Winwick. | |
| | Is the Site well connected to the built-up area? Does it have 2 or more boundaries with the existing built-up area? | Yes. The Site is bounded on two sides by existing developed parts of Winwick. | |
| | Would development of the Site effectively 'round off' the settlement pattern? | Yes. The Site would round off this part of Winwick reflecting the broad extent of the existing settlement to the north and west. | |
| | Do natural and physical features (major road, river etc.) provide a good existing barrier between the existing development and undeveloped land, which if breached may set a precedent for unrestricted sprawl? | The Site is defined on two sides by existing urban form/ road infrastructure. The third and final boundary is formed by an existing hedgerow which has the opportunity to be strengthened through the design process. | |
| 2. Prevent neighbouring towns from merging | Do natural features and infrastructure provide a good physical barrier or boundary to the Site that would ensure development was contained? | The Site is defined on two sides by existing urban form/ road infrastructure. The third and final boundary is formed by an existing hedgerow which has the opportunity to be strengthened through the design process. | Development of the Site would not result in the merging of settlements. |
| | Would development of the Site lead to physical connection of two or more settlements? | No the nearest settlement is Newton-Le-Willows which is located approximately 1.5km to the North West. There is no visual or perceptible connectivity between the two settlements given the extent of remaining open agricultural land, and intervening vegetation. | |
| | Would the development of the Site help preserve the physical separation of settlements across the district? | Yes, the Site benefits from greater levels of enclosure from its surrounding features than potential alternatives adjacent to Winwick. The indicative capacity of 90 dwellings as set out in the Local Plan could be incorporated within the logical boundaries of the Site without need for the creation of artificial boundaries to the settlement. The Parcel also would promote the coalescence of Winwick with the Warrington Urban Area as demonstrated by alternatives to the south of the settlement. | |

Table 1 : Green Belt Assessment Table

| PURPOSE | CRITERIA AND DEFINITIONS | ASSESSMENT | CONCLUSIONS |
|--|--|---|---|
| 3. Assist in safeguarding the countryside from encroachment | Is there a strong, defensible boundary between the existing urban area and the Site – wall, river, main road etc (as opposed to garden boundaries)? | Two existing roads provide the existing boundaries of the Site, and whilst it is acknowledged that these provide strong boundaries to the settlement as existing, an equally strong boundary could be created to the north/west of the Site allowing the sensitive rounding off of the existing settlement pattern. | The Site is acknowledged to fulfil a moderate role in this function, however can be developed to ensure that remaining agricultural land is safeguarded from development. |
| | Does the site provide access to the countryside – footpaths, bridleways across the land, or it is designated park / green space? | A public right of way runs within the western boundary of the Site. Notwithstanding the presence of this footpath, the majority of the Site is in agricultural use and as such is not accessible to the public. | |
| | Does the site include national or local nature conservation designation areas? | No. There are no designated ecological sites or sites of nature conservation within or adjacent to the Site. | |
| | Does the site include areas of woodland, trees, hedgerow that are protected (protected ancient woodland) or significant unprotected tree / hedge cover? | There are no trees within the Site. Trees and hedgerow are concentrated towards the boundaries of the Site. The Site can be developed retaining the majority of these features save for access. | |
| | Does the Site include any best and most versatile grade 1,2,3a (where known) agricultural land? | Unknown. Large parts of the Borough however are either Grade 2, 3a or 3b. | |
| | Does the Site contain buildings? | No. | |
| 4. Preserve the setting and special character of historic towns | Winwick is not recognised as a settlement of historical importance and as such the Green Belt is not considered to serve this purpose in this location. The Site is near the Parish Church of Winwick but due to thick existing vegetation there is very limited to no visual connectivity between the Site and the Church and the Site is not considered to form part of its setting. | Development of the Site would have no effect on the setting and special character of a historic town. | |
| 5. Assist in urban regeneration, by encouraging the recycling or urban / derelict land | N/A | No. The Site is promoted as a suitable Site for housing for Green Belt release to meet the future housing needs of Warrington. The Council has identified insufficient brownfield capacity to meet these needs. The release and allocation of this Site would help to address this shortfall against identified needs, and this will not conflict with the Council's regeneration strategy. | Development of the Site would not have any impact on the regeneration of the Borough. |

As set out within this Development Framework, the Site is capable of providing a logical extension to the settlement with clearly defined and durable boundaries. The development of this Site would not compromise the integrity of the surrounding landscape. Moreover, as set out above, the development would lessen Greenbelt pressures elsewhere in the Borough in more sensitive locations, thus helping to preserve the openness of the Green Belt as a whole.

The Site is adjacent to the existing urban edge of Winwick, located to the north of Hollins Lane and west of Newton Road. The Site is well related to the existing settlement and would provide for a logical rounding off of Winwick in this location, with northern and western boundaries to the development reflecting the current extent of the built up area of Winwick. It is clear from the Sustainability Assessment set out earlier in this document that the Site is located close to a number of existing facilities within Winwick.

The Site is accessible to a public transport route along Newton Road. Frequent bus services operate to Warrington Town Centre and Newton-Le-Willows where there is a wider range of services and employment opportunities. There are also further rail connections in both to Manchester and Liverpool settlements.

The development of the Site will provide for an attractive and accessible residential area as well as to help safeguard and enhance the vitality and vibrancy of Winwick. The allocation of the Site will also assist the Council in meeting its wider housing needs which have been defined in response to latest evidence of demographic, affordable and economic needs.

OVERALL CONCLUSIONS FROM GREEN BELT ASSESSMENT

National Planning Policy acknowledges that in order to fulfil housing requirements, a review of the Green Belt may be necessary. As shown within the recent Preferred Development Options Local Plan, the Council is clearly of the view that the circumstances of housing need and supply justify the need to review Green Belt boundaries around Warrington.

Winwick is recognised by the Council as a sustainable settlement, and one which is both capable and in need of further housing growth. Due to the constrained nature of the settlement there will be a need to release land from the Green Belt in response to this context.

Clearly, preference should be given to those sites that no longer meet at least one of the five purposes for its inclusion within the Green Belt as defined at paragraph 80 of the NPPF. As should the requirement to provide for a sustainable pattern of development, and identify sites which respond to the scale of growth sought by the Council at each settlement.

Our assessment shows that the Site fulfils a moderate role within the Green Belt, and is capable through careful design of safeguarding the countryside from encroachment. The Site will provide for a sustainable development and a scale of growth which is appropriate for the Site and wider settlement. The development will support the delivery of the Council's housing requirement, and will help maintain the vitality and vibrancy of Winwick.

We welcome further discussions with the Council regarding the assessment of this Site.



NEIGHBOURHOOD

The Site is well related to the built up area of Winwick and is sustainably located in close proximity to Winwick Village Centre. Winwick is identified as an Outlying Settlement within the emerging Warrington Local Plan. Warrington Town Centre is within 5km of the settlement and is accessible to the Site by public transport. The Site therefore occupies a sustainable and suitable location for new development.

Figure 3 opposite demonstrates that a significant proportion of facilities and public transport opportunities are within a convenient walking and cycling distance from the Site.

FACILITIES

The Site is well located in relation to a range of local services and amenities. These include but are not limited to:

- St Oswald CofE Church;
- Hollins Park Hospital;
- Winwick CofE Primary School;
- Winwick Leisure Centre;
- The Cheshire day nursery;
- The Swan (Public House);
- Premier Inn;
- Bliss Books;
- B&Q;
- St Oswalds House Care Home.

EMPLOYMENT

Winwick Quay Business Park is located approximately 1km to the south of the Site, just beyond the M62. This area is characterised by light industrial uses and medium size offices. Notable employers include AAH Pharmaceuticals and Royal Mail.

This Business Park lies within the wider area of Hulme (Warrington) which also includes a greater range of employment opportunities including several large retail units and a range of commercial businesses. Beyond Hulme to the south lies Longford and Warrington Town Centre where a more significant range of employment opportunities can be accessed.

EXISTING ROAD NETWORK

The Site is accessible from Hollins Lane and the A49 (Newton Road). Hollins Lane provides access to the south of the Site, and the A49 to the east of the Site. Accordingly, the Site is well connected by the existing road network with access via the A49 and Winick Link Road to the M6 and M62, connecting Winwick to major cities including Manchester and Liverpool.

SUSTAINABLE TRANSPORT

The Site benefits from access to public transport in the form of existing bus stops /services directly adjacent to the Site on Hollins Lane and Norton Road. Regular daily connections are available from these bus stops include Bus Services 22, 22E, 24E, 75,

360, 329. In addition, bus stops served by Bus Service 19 also lie within easy walking distance of the Site on Myddleton Lane.

Bus Services 360, 329, 19, 22 are alternating services and generally provide 7 services per hour from the morning until early evening with a similar frequency on a Saturday. Destinations including Warrington Town Centre to the south and Newton-le-Willows to the north. Bus Services 22E and 24E are evening services that operate through Winwick until 11pm between Newton-le-Willows and Warrington.

Onward travel via public transport is available via bus connection to Warrington Station which is located on the national rail network providing links to major towns and cities across the region such as Manchester and Liverpool.

WALKING AND CYCLING

Ladies' Walk is a Public Right of Way that provides access across the Site from Hollins Lane to Newton Road. The Site also benefits from convenient access to the surrounding countryside to the west.



1. St Oswald CofE Church



2. Hollins Park Hospital



3. Wiwick CofE Primary School



4. Wiwick Leisure Centre

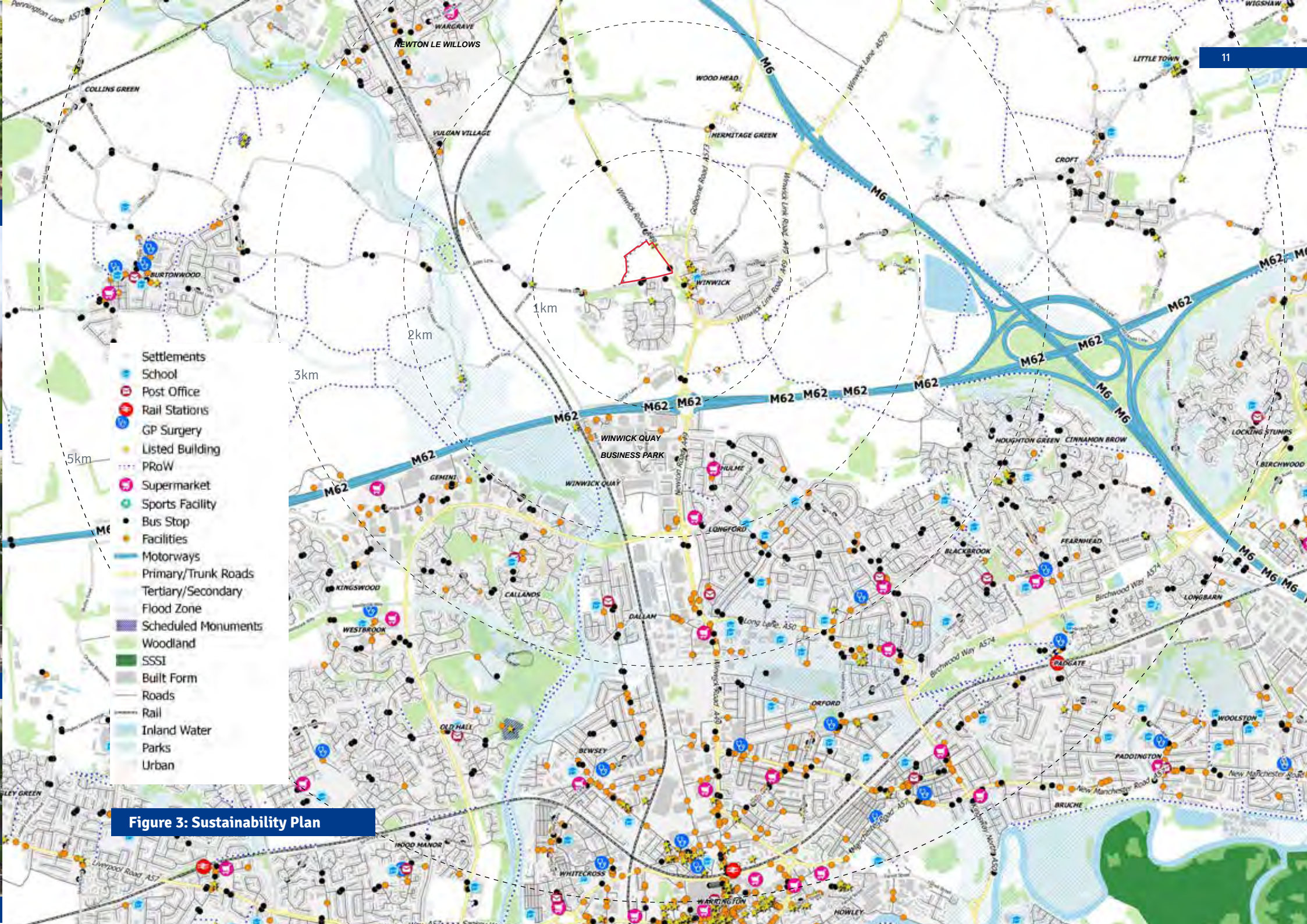


Figure 3: Sustainability Plan

TOWNSCAPE CHARACTER

Winwick exhibits a varied residential character which is reflective of the manner in which settlement growth has occurred over a series of historic phases.

The historical settlement area of Winwick is largely located to the east of the Site and typically comprises of large early 1800s agricultural worker’s cottages and farmhouses (image 1 & 2).

The main village high street (Goulbourne Road) is characterised by a series of cottages and community facilities (image 3). New housing development has expanded north of Goulbourne Road along Spires Gardens, comprising large detached and semi-detached properties characterised by red brick and rendered facades with grey roof tiles (image 4).

Further east of the Site is a series of Victorian red brick terrace houses on Myddleton Lane (image 5) and beyond is an area of 1950s and 1960s Post-War semi-detached red brick housing (image 6).

South-east of the Site is an area of 1970s bungalow housing served of Faringdon Road (image 7, 8 & 9). These properties are characterised by brown/red brick, weatherboard cladding, grey roof tiles and the occasional built in attic rooms.

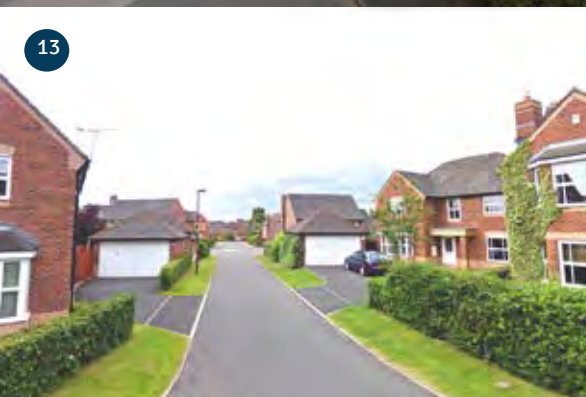
South and overlooking the Site on Hollins Lane are a series of victorian red brick terrace houses with ground floor bay windows. The front gardens feature old victorian lamp posts (image 10).

Further south of the Site is a modern medium density residential estate. This replaced the former Winwick Hospital mental asylum which was closed in 1997. The housing estate has a distinctive layout which was influenced by the layout of the former hospital buildings, many of which were demolished to make way for the new housing estate. The Estate is characterised by a mix of house types including large 4-5 bedroom detached and semi-detached houses designed in a contemporary georgian architectural style (image 11, 12) and 3-4 bedroom semi-detached and detached red brick houses (image 13). At the centre of this development is a formal landscaped square surrounded by hedgerows (image 14). The former hospital recreational grounds have been retained as a large public park surrounding the housing development (image 15).

North east of the Site, at the edge of Goulbourne Road, are a series of new bespoke designed private detached houses set within generous plots (image 16).



Figure 4: Photograph Location Map



OPPORTUNITIES AND CONSIDERATIONS

In order to guide the emerging design vision and Concept Masterplan for the Site, an initial site assessment has been undertaken to identify a series of opportunities and considerations.

CONSIDERATIONS

- Ensure the new street network and development plots respond to the existing Site topography whilst minimising ground remodelling.
- Retain and integrate existing landscape features adjacent to the Site boundaries including existing trees and hedgerows along the Site boundary.
- Consider a range of house types across the Site to reflect the local character housing in the area.
- Consider traffic management across the Site through the design of a legible street hierarchy.
- Retain and integrate existing PRow in the design.
- Consider the provision of public open spaces on Site to aid orientation and movement across the Site.

OPPORTUNITIES

- Integrate landscape features of value into the landscape framework capable of supporting and enhancing the biodiversity through the provision of rich planting.
- Enhance the amenity, ecological and arboricultural value of the existing trees within the Site.
- Provide new vehicle access into Site from Hollins Lane.
- Retain and enhance the PRow along the west and north edge of the Site boundary.
- Provide high-quality housing set within an attractive landscape setting to soften the proposed built form.
- Enhance the appearance of the urban edge through the inclusion of new planting within and at the edge of the proposed development.
- Provide direct pedestrian and cycle connections to existing bus stops located on Hollins Lane and Newton Road (A49).
- Increase scope for more sustainable transport opportunities, including walking and cycling.
- Provide a SuDS that works with the existing topography and change in levels on Site.
- Provision of parkland surrounding the Site.

KEY

- Site Boundary
- ↗ Existing Vehicle Access
- ↘ Potential Vehicle Access
- ↙ Existing Pedestrian Access
- - - PRow
- 40mph Speed Limit Road
- Trees
- Hedgerow
- ✳ Existing Pond (outwith Site)
- ✳ Potential Drainage Pond
- Existing Drainage Ditch
- Contours
- Bus Stops
- ✳ Listed Buildings



Figure 5: Site Assessment Plan

DESIGN VISION AND EMERGING PROPOSALS

DESIGN VISION

The vision for the Site is to:

- Create an attractive and high quality residential neighbourhood which responds positively to its landscape and urban contexts and respects the character of Winwick.
- To create an integrated and accessible new movement network which strengthens existing connections, offers choice and promotes sustainable modes of travel.
- To create a walkable neighbourhood which is legible and easy to move around in, providing strong linkages to access local amenities, existing residential areas and new green infrastructure.
- To provide the right ingredients for a balanced and sociable residential community comprising around 120 dwellings of varying types, sizes and densities.
- To create imaginatively designed homes with gardens which have easy access to a range of amenities including children's play and landscaped green space.
- To create a place which enhances the natural environment and character of the Site, providing a comprehensive and fully inter-connected network of green infrastructure.

DEVELOPMENT QUANTUM

Taking into account the location of the Site and the density of existing and committed residential development, an average density of 30 dwellings per net hectare has initially been applied. This preliminary assessment will be reviewed as discussions with the Council progress.

The proposed density allows for the creation of a sustainable and balanced residential development, comprising a mix of housing types, sizes and tenures.

Based on an average net density of 30 dwellings per net hectare, the proposed development quantum is anticipated to be in the region of 120no. dwellings.

The opportunities and considerations previously presented have informed key design principles that have been integrated into the design of a Concept Masterplan.

DESIGN PRINCIPLES

The opportunities and considerations previously presented have informed key design principles that have been integrated into the design of a Concept Masterplan.

1. **Development blocks** will be positioned in response to the Site topography.
2. **Existing landscape features** will be retained and incorporated into a green infrastructure network. This will create a setting and identity for the new development, whilst providing increased biodiversity, recreation opportunities and landscape visual mitigation.
3. **A range of house types** will be provided across the Site.
4. **New streets** will be designed to prioritise pedestrians whilst creating a clear road layout for vehicles.
5. **Pedestrian and cycle connections** that connect with the surrounding area and public transport network will be provided throughout the development and within areas of public open space.
6. **Provision of a new circular park around the development, reflective of the parkland to the south** to aid orientation, link and enhance PRow and provide an attractive, functional and accessible place for leisure and recreation.

7. **Provision of incidental green spaces** to address Site topography and strengthen the legibility of pedestrian access points into the Site.
8. **Vehicular access** to the Site will be delivered from Hollins Lane.
9. **Sustainable drainage features** including swales and attenuation ponds will be located in response to Site topography and existing drainage patterns.
10. **Consideration of western boundary treatment** and softening of settlement edge.



KEY

- Site Boundary
- Indicative Development Plots
- Landscape
- Potential Drainage Pond
- Potential Primary Vehicle Routes
- Potential Pedestrian / Cycle Route
- PRow
- Pedestrian Access
- Potential Vehicle Access
- Existing Bus Stops
- ✳ Listed Buildings

Figure 6: Concept Masterplan

BENEFITS AND CONCLUSION

BENEFITS

The Site represents an available, suitable and sustainable Site, having regard to the following benefits:

- The development of the Site will provide a mix of high quality housing for the local area and wider Borough.
- The provision of new housing will help drive forward Warrington Borough Council's objective to supporting population growth across the Borough.
- The Site is considered to make no more than a moderate contribution to the Green Belt.
- The Site has the potential to deliver a valuable contribution towards supporting the local economy.
- The Site provides an opportunity to enhance and improve existing public rights of way.
- The Site occupies a sustainable location for new housing, within easy access to public transport opportunities on both Hollins Lane and Newton Road.
- The Site has the potential to secure safe vehicular access along Hollins Lane, without having an unacceptable impact on the local highway network.
- There is the opportunity to create integrated pedestrian and cycle linkages as part of the Site's development, linking to existing bus stops adjacent to the Site, encouraging alternative modes of transport to the private car and will contribute towards a low-carbon community.
- The Site has the potential to provide a new Park which will provide an attractive setting for residents and the wider community whilst aiding orientation and providing opportunities for leisure and recreation.
- Any development will be set within a strong landscape framework which will assist in absorbing the proposed development into the surrounding landscape character.
- The Concept Masterplan for the Site has taken full account of local landscape and nature conservation interest.
- Any development will retain and enhance existing land features and this will be strengthened through the implementation of new soft landscaping at the edges of and within the Site.





CONCLUSION

This Development Framework has undertaken an assessment of the Site, its context and its development potential. In doing so, it has been demonstrated that there are sound planning and design reasons for the Site to be allocated for future housing growth.

In conclusion, the Site represents a logical extension to existing resident development in Winwick, is available, and offers a suitable location to help meet Warrington Borough's short and longer term housing needs.

Next Steps

The Site is considered deliverable and could start to deliver within the next five years and Miller Homes are committed to progressing the emerging Concept Masterplan towards a high quality residential development that responds to the local housing need, whilst taking into account and reflecting the character of the surrounding settlement.

We look forward to working with Warrington Borough Council to progress the proposals for the Site, and welcome any feedback and/or the opportunity to meet and discuss.

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Appendix 3 - Housing Supply Table



SITE SPECIFIC HOUSING LAND SUPPLY ASSESSMENT (AT JUNE 2019)


TABLE 1: TOWN CENTRE SUPPLY


| Site Ref. | Site Address | Existing Use | No. of dwellings assumed by WBC | Planning Status | Barton Willmore Assessment and Commentary | Site Image |
|---|--|---|---------------------------------|------------------------|---|---|
| STADIUM QUARTER | | | | | | |
| A20 (UCS) 1401 (SHLAA ¹) | Land at Winwick Street, Warrington WA2 7NG | Mixed use | 200 (UCS) 20 (SHLAA) | No planning permission | <p>Our Client does not dispute that this site is potentially suitable, available and deliverable over the Plan period given the site has previously benefited from consent for a mixed-use development. However, our Client questions whether the site has the capacity to deliver 200 dwellings.</p> <p>The trajectory at Appendix 2 of the UCS confirms this figure is based on 82% of the site being developed for housing at a density of 140dpa. Whilst we do not disagree with assumed density, the Land Use Plan that accompanies the UCS and the SHLAA confirm that this parcel is intended to come forward as a mixed-use development plot. As such, the percentage of the site to be developed for residential purposes is likely to be a lot lower than that stated in the UCS.</p> <p>The SHLAA states that as part of a mixed-use scheme the site is expected to deliver 20 dwellings over the Plan period. Based on this evidence and the Council's future intentions for the site, 180 dwellings should, therefore, be removed from the overall supply.</p> |  |
| A26 (UCS) | Land bounded by Haydock Street, John Street and Winwick Street, Warrington | Mixed use – offices, retail and cultural centre | 35 (UCS) | No planning permission | <p>The UCS claims that this site will deliver 35 dwellings within the first five years of the Plan period. The site is not available now, does not benefit from planning permission for housing and has not been identified as being suitable for housing as part of the SHLAA.</p> <p>The two-storey building in the south west corner of the site is also Grade II Listed. The NPPF gives great weight to the conservation of designated heritage assets and the loss of a Grade II Listed building should only be allowed in exceptional circumstances. The Council has not provided any evidence to justify that such circumstances exist to demolish the building for housing.</p> <p>Moreover, the Council has not presented any evidence to demonstrate that there are reasonable prospects that housing will be delivered on the site within the next five years or that it will become available over the Plan period. There is no developer interest in the site and there is no evidence to suggest that the Council intends to impose a compulsory purchase order to acquire the site for housing development. As such, the site should not be included within the housing land supply because it does not meet the definition of 'deliverable' or 'developable' set out within the NPPF. 35 dwellings should, therefore, be removed from the</p> |  |

¹ Strategic Housing Land Availability Assessment (2018)

| Site Ref. | Site Address | Existing Use | No. of dwellings assumed by WBC | Planning Status | Barton Willmore Assessment and Commentary | Site Image |
|------------------------------|--|--------------------|---------------------------------|--|--|---|
| | | | | | five year supply as well as the overall supply. | |
| BRIDGE STREET QUARTER | | | | | | |
| B2 (UCS) | Land bound by Academy Street, Academy Way, Bank Street, Moulders Lane, Bridge street, Union Street and Horrocks Lane, Warrington | Under construction | 62 (UCS) | Planning permission granted in December 2014 for a mixed-use development (ref. 2014/24473) | <p>The UCS identifies this site as delivering 62 dwellings in the first five years of the Plan period. However, Muse alongside WBC are currently developing this site for the mixed-use scheme approved as part of application ref 2014/24473. The development includes:</p> <ul style="list-style-type: none"> • A new market hall • Class A1 retail uses • Class A2 financial and professional services uses • Class A3 restaurants and cafes • Class B1 office uses including a new council office building • Class D1 non-residential uses including a library • Class D2 leisure uses including a cinema <p>The planning permission does not include any provision for housing and there have been no subsequent planning applications on the site for this use. Furthermore, the Council has not assessed this site as part of their SHLAA or provided any alternative evidence to demonstrate that there is a realistic prospect that housing will be delivered on the site within five years. As such, the site does not meet the definition of deliverable set out in the NPPF and 62 dwellings should be removed from the five year supply and overall supply.</p> |  |
| COCKHEDGE QUARTER | | | | | | |
| C1 (UCS) | Land bound by Scotland Road, Winwick Street and Crown Street, Warrington | Retail | 160 (UCS) | No planning permission | <p>This parcel currently comprises three Grade II Listed Buildings – the National Westminster Bank, 3 and 5 Winwick Street and the Theatre Tavern. Whilst the buildings could all potentially become available in the future, at three storeys in height the size of the existing buildings are not suitable to accommodate 160 dwellings. The land available for development on the site is also limited and the existing buildings would need to be demolished to accommodate the anticipated level of development.</p> <p>The NPPF gives great weight to the conservation of designated heritage assets and the loss of a Grade II Listed Building should only be allowed in exceptional circumstances. The Council has not provided any evidence to justify that such circumstances exist to deliver the anticipated number of dwellings. The demolition of the buildings is, therefore, highly unlikely to be an option moving forward.</p> <p>Furthermore, the site does not benefit from planning permission for housing and has not been considered as part of the Council's SHLAA. The buildings have a commercial use and are within the ownership of multiple private landowners. There is no evidence to demonstrate there is developable interest in the site or that the buildings are suitable to be converted in residential</p> |  |

| Site Ref. | Site Address | Existing Use | No. of dwellings assumed by WBC | Planning Status | Barton Willmore Assessment and Commentary | Site Image |
|---------------------------------|---|---|---------------------------------|------------------------|---|---|
| | | | | | accommodation. As such, the site does not meet the NPPF definition of developable and 160 dwellings should be removed from the overall supply. | |
| C2, C7 and C8 (UCS) | Cockhedge Shopping Park, Scotland Road, Warrington | Bingo, retail units and associated car park | 220 (UCS) | No planning permission | <p>The UCS claims that these three parcels will start to deliver dwellings in 2027/28. Whilst the site could potentially be suitable for housing in the future, the site not currently available given it is occupied by a bingo hall, retail units and associated car park.</p> <p>The private landowner, who controls Cockhedge Shopping Park, is not promoting the site for redevelopment through the Local Plan process, the site does not benefit from planning permission for housing and the Council has not presented any evidence in the SHLAA to demonstrate that:</p> <ul style="list-style-type: none"> • There are reasonable prospects that it will become available over the Plan period; • That there is developer interest in the site; and • That the Council intends is impose a compulsory purchase order to acquire the site for housing development. <p>As such, the site should not be included within the housing land supply because it does not meet the definition of 'developable' set out within the NPPF. 220 dwellings should, therefore, be removed from the overall supply.</p> |  |
| ARPLEY ROAD | | | | | | |
| J1-J5 (UCS) 2672 (SHLAA) | Land south of Wilson Pattern Street (inc. former Ms Smiths), Warrington WA1 1HN | Mixed use | 782 (UCS) 300 (SHLAA) | No planning permission | <p>Our Client does not dispute that this site could potentially be suitable to accommodate housing development in the future. However, the SHLAA confirms that:</p> <ul style="list-style-type: none"> • The site is in active use – commercial and retail; • The site does not benefit from planning permission for housing; • The site is not available now; • The site is not being promoted by a developer; and • There is no developer interest in the site. <p>A review of the Land Registry details confirms the site is in multiple private ownerships and the Council has not presented any other evidence to demonstrate that there are reasonable prospects that the site will become available over the Plan period or to demonstrate that the Council intends is impose a compulsory purchase order to acquire the site for housing development.</p> <p>Furthermore, the UCS figure of 782 dwellings is based on a density of 245dpa with housing being delivered on 100% of the site. This assumption conflicts with the findings of the SHLAA and the Warrington Masterplan Overall Illustrative Heights Plan which suggests only the eastern riverside plots would be suitable for a very high density of development. If the Council can;</p> |  |

| Site Ref. | Site Address | Existing Use | No. of dwellings assumed by WBC | Planning Status | Barton Willmore Assessment and Commentary | Site Image |
|-------------------------------------|---|------------------------------------|---------------------------------|------------------------|---|--|
| | | | | | <p>however, demonstrate the site is available, the delivery of 782 dwellings on the site is wholly unrealistic and we consider the SHLAA figure of 300 dwellings to be more appropriate.</p> <p>Notwithstanding this, the Council has failed to robustly demonstrate the availability of the site, therefore, it should not be included within the housing land supply because the site does not meet the definition of 'deliverable' or 'developable' set out within the NPPF. As such, 782 dwellings should be removed from the overall supply and 55 dwellings from the five year housing land supply.</p> | |
| ST ELPHINS QUARTER | | | | | | |
| E9-E13 (UCS) | Land at Fennel Street and Church Street, Warrington | Retail, residential and a car wash | 94 | No planning permission | <p>The UCS claims that these five parcels will start to deliver dwellings in 2026/27. Whilst the site could potentially be suitable for housing in the future, the site is not currently available because it is occupied by a Lidl supermarket, a nursing home, a car wash as well as several other smaller retail units and private residential properties.</p> <p>A Land Registry search confirms the site is owned by multiple private landowners who are not promoting the site for development through the Local Plan process. Furthermore, the site does not benefit from planning permission for housing and the Council has not presented any evidence in the SHLAA to demonstrate that:</p> <ul style="list-style-type: none"> • There are reasonable prospects that it will become available over the Plan period; • That there is developer interest in the site; and • That the Council intends to impose a compulsory purchase order to acquire the site for housing development. <p>As such, the site should not be included within the housing land supply because it does not meet the definition of 'developable' set out within the NPPF. 94 dwellings should, therefore, be removed from the overall supply.</p> |  |
| SOUTHERN GATEWAY | | | | | | |
| I4 and I5 (UCS) 2482 (SHLAA) | Wharf Industrial Estate, Wharf Street, Warrington | Commercial – industrial | 129 | No planning permission | <p>The site is located on the banks of the River Mersey and falls within Flood Zone 2 and 3. The NPPF is clear that development should be directed away from areas at highest risk of flooding and in applying the sequential test development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding.</p> <p>Our Client contests that there is land available elsewhere in the Borough that is suitable and available to accommodate housing and the Council has not provided any evidence to demonstrate that the sequential test has been passed. The site is, therefore,</p> | |

| Site Ref. | Site Address | Existing Use | No. of dwellings assumed by WBC | Planning Status | Barton Willmore Assessment and Commentary | Site Image |
|---|--|-------------------|---------------------------------|-------------------------------|---|---|
| | | | | | <p>not suitable to accommodate residential development.</p> <p>Furthermore, the site is not currently available because it is occupied by several well-established commercial businesses. A Land Registry search also confirms that the site is owned by multiple private landowners who are not promoting the site for development through the Local Plan process. The SHLAA acknowledges that there are ownership/tenant issues with this site and the Council has not presented any evidence to demonstrate that these issues can be overcome for there to be reasonable prospects the land will become available over the Plan period.</p> <p>Set in this context, the site is not suitable or developable in accordance with the NPPF and NPPG. As such, 129 dwellings should be removed from the overall supply.</p> |  |
| <p>18, 112, 113, 114, 115 (UCS) 2676 (SHLAA)</p> | <p>Causeway Park, Wilderspool Causeway, Warrington</p> | <p>Commercial</p> | <p>286 (UCS)</p> | <p>No planning permission</p> | <p>Causeway Park comprises a well-established industrial estate that is not currently available for development. A Land Registry search confirms that the site is owned by multiple private landowners who are not promoting the site for development through the Local Plan process, the site does not benefit from planning permission for housing and the Council has not presented any evidence in the SHLAA to demonstrate that:</p> <ul style="list-style-type: none"> • There are reasonable prospects that it will become available over the Plan period; • That there is developer interest in the site; and • That the Council intends to impose a compulsory purchase order to acquire the site for housing development. <p>The site falls within Flood Zone 2. The NPPF is clear that development should be directed away from areas at highest risk of flooding and in applying the sequential test development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding.</p> <p>Our Client contests that there is land available elsewhere in the Borough that is suitable and available to accommodate housing and the Council has not provided any evidence to demonstrate that the sequential test has been passed.</p> <p>Furthermore, our Client has serious concerns regarding the viability of this site given its current commercial use and potential for contamination. The SHLAA also acknowledges that the site is constrained and is not suitable to accommodate residential development. Set in this context, the site is not suitable, deliverable or developable in accordance with the NPPF and NPPG. As such, 286 dwellings should be removed from</p> |  |


| Site Ref. | Site Address | Existing Use | No. of dwellings assumed by WBC | Planning Status | Barton Willmore Assessment and Commentary | Site Image |
|---|------------------------------------|----------------------|---------------------------------|------------------------|---|--|
| | | | | | the overall supply and 40 dwellings from the five year housing land supply. | |
| 117, 118 and 119 (UCS) 2450 (SHLAA) | Land adjacent Colas, Loushers Lane | Commercial and trees | 113 (UCS) | No planning permission | <p>The site is predominantly in commercial use and is not available for development. The eastern part of the site is also covered in tree and the ecological and recreational value of this part of the site is currently unknown. The SHLAA states that the site is considered unsuitable for residential development but there is strong interest in developing this site and it may be as further exploratory work is undertaken this conclusion may be revisited.</p> <p>If this site is to form part of the overall housing land supply, the Council need to provide robust evidence to demonstrate that there are reasonable prospects that the site will become available and developable over the Plan period as required by the NPPF. At this time, the Council's evidence suggests this site is constrained and not suitable for residential development, therefore, the site cannot be considered suitable or developable for housing.</p> <p>Furthermore, the site falls within Flood Zone 2. The NPPF is clear that development should be directed away from areas at highest risk of flooding and in applying the sequential test development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding.</p> <p>Our Client contests that there is land available elsewhere in the Borough that is suitable and available to accommodate housing and the Council has not provided any evidence to demonstrate that the sequential test has been passed.</p> <p>Set in this context, the Council has not produced any evidence to demonstrate that the site is suitable or developable in accordance with the NPPF and NPPG. As such, 113 dwellings should be removed from the overall supply.</p> |  |
| TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE OVERALL HOUSING LAND SUPPLY: | | | | | | 2,061 |
| TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE FIVE YEAR HOUSING LAND SUPPLY: | | | | | | 192 |

TABLE 2: WIDER URBAN AREA SUPPLY (SHLAA) (SITES 0.25HA AND ABOVE)

| Site Ref. | Site Address | Existing Use | No. of dwellings assumed by WBC | Planning Status | Barton Willmore Assessment and Commentary | Site Image |
|--------------|--|--|---------------------------------|--|--|---|
| 1178 (SHLAA) | Cardinal Newman High School, Bridgewater Avenue, Latchford | Secondary School | 110 | Outline planning permission granted for residential development and relocation and expansion of formal recreation facilities in October 2006 | <p>The UCS claims that this site will start to deliver dwellings in 2025/26. However, the site is currently in active use, occupied by a secondary school and its associated recreational facilities. The site does not currently benefit from planning permission for housing and the Council has not presented any evidence in the SHLAA to demonstrate that:</p> <ul style="list-style-type: none"> • There is no longer a need for the school or recreational facilities on the site; • There is an alternative site to relocate the school; • There are reasonable prospects that it will become available over the Plan period; • That there is developer interest in delivering residential development the site; and • The Council (the landowner) intends to dispose of the site. <p>Furthermore, the site falls within Flood Zone 3. The NPPF is clear that development should be directed away from areas at highest risk of flooding and in applying the sequential test development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding.</p> <p>Our Client contests that there is land available elsewhere in the Borough that is suitable and available to accommodate housing and the Council has not provided any evidence to demonstrate that the sequential test has been passed.</p> <p>As such, the site should not be included within the housing land supply because it is not suitable for residential development and does not meet the definition of 'developable' set out within the NPPF. 110 dwellings should, therefore, be removed from the overall supply.</p> |  |
| 2182 (SHLAA) | PDC Irwell Road, Latchford, WA4 6BB | Vacant council offices and disused playing field | 50 | No planning permission | <p>This site is owned by Warrington Borough Council; therefore, our Client does not dispute that there are reasonable prospects this site could be available for development over the Plan period. However, the emerging Submission Version Proposals Map seeks to protect the playing fields on the eastern part of the site as open space under draft Policy DC5 of the emerging Local Plan.</p> <p>As such, the site should not be included within the housing land supply because it does not meet the definition of 'developable' set out within the NPPF. 50 dwellings should, therefore, be removed from the overall supply.</p> |  |

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| TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE HOUSING LAND SUPPLY: | | | | | | 160 |
| TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE FIVE YEAR HOUSING LAND SUPPLY: | | | | | | 0 |

TABLE 3: WATERFRONT SUPPLY

| Site Ref. | Site Address | Existing Use | No. of dwellings assumed by WBC | Planning Status | Barton Willmore Assessment and Commentary | Site Image |
|----------------------------------|--|--------------|---------------------------------|---|---|---|
| K9 and K10 (UCS) 1715 (SHLAA) | Spectra Building & Drivetime Golf Range, South of Centre Park Business Park, Warrington, WA1 1QL | Commercial | 530 | EIA Screening for up to 510 dwellings (ref. 2017/30982) | <p>The two parcels are available, and the site is being promoted by Countryside Properties for the development of up to 510 dwellings. However, our Client has concerns regarding the suitability of the site for residential development.</p> <p>Parcel K9 to the north is in Flood Zone 3 owing to its location on the banks of the River Mersey. The NPPF is clear that development should be directed away from areas at highest risk of flooding and in applying the sequential test development should not be allocated or permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding.</p> <p>Our Client contests that there is land available elsewhere in the Borough that is suitable and available to accommodate housing and the Council has not provided any evidence to demonstrate that the sequential test has been satisfied. As such, the site does not meet the definition of 'deliverable' or 'developable' and 330 dwellings should be removed from the five year supply and 368 from the overall supply.</p> <p>In relation to the southern part of the site (ref. K10), the Council expects this site to start delivering dwellings in 2020/21. However, the site does not benefit from planning permission and no planning application has been submitted since the EIA Screening Opinion was issued in 2017. Based on the lead-in time assumptions set out in Table 2.2 of the SHLAA this part of the site will not deliver dwellings until 2022/23. An additional 110 dwellings should, therefore, be removed from the five year housing land supply.</p> |  |
| K19 | Land to the north of Liverpool Road, Sankey Bridge | Commercial | 27 | No planning permission | <p>The UCS claims that this site will deliver 27 dwellings within the first five years of the Plan period. The site is occupied, does not benefit from planning permission for housing and has not been identified as being suitable for housing as part of the SHLAA.</p> <p>Moreover, the Council has not presented any evidence to demonstrate that there are reasonable prospects that housing will be delivered on the site within the next five years or that it will become available over the Plan period. There is no developer interest in the site and there is no evidence to suggest that the Council intends to impose a compulsory purchase order to acquire the site for housing development. As such, the site should not be included within the housing land supply because it does not meet the definition of 'deliverable' or 'developable' set out within the NPPF. 27 dwellings should, therefore, be removed from the five year supply as well as the overall supply.</p> |  |




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|---|--|------------|----|------------------------|---|---|
| K20 | John Kay Group, Liverpool Road, Sankey Bridges | Commercial | 35 | No planning permission | <p>The UCS claims that this site will deliver 35 dwellings within the first five years of the Plan period. The site is not available now, does not benefit from planning permission for housing and has not been identified as being suitable for housing as part of the SHLAA.</p> <p>Moreover, the Council has not presented any evidence to demonstrate that there are reasonable prospects that housing will be delivered on the site within the next five years or that it will become available over the Plan period. There is no developer interest in the site and there is no evidence to suggest that the Council intends to impose a compulsory purchase order to acquire the site for housing development. As such, the site should not be included within the housing land supply because it does not meet the definition of 'deliverable' or 'developable' set out within the NPPF. 35 dwellings should, therefore, be removed from the five year supply as well as the overall supply.</p> |  |
| TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE HOUSING LAND SUPPLY: | | | | | | 430 |
| TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE FIVE YEAR HOUSING LAND SUPPLY: | | | | | | 502 |

TABLE 4: GARDEN SUBURB (PHASE 1) SUPPLY

| Site Ref. | Site Address | Existing Use | No. of dwellings assumed by WBC | Planning Status | Barton Willmore Assessment and Commentary | Site Image |
|-------------|---|------------------------|---------------------------------|--|--|---|
| 308 (SHLAA) | Land at Appleton Cross, Dipping Brook Avenue, Grappenhall | New Town Reserved Land | 350 | Outline planning permission granted in January 2018 (ref. 2017/29930) Pending Reserved Matters submitted May 2019 (ref. 2019/35105) | <p>Our Client does not dispute that this site is suitable, available and deliverable over the Plan period. However, the SHLAA trajectory expects this site to deliver 294 dwellings within the first five years of the plan period as set out below.</p> <p><u>Years 1 - 5</u></p> <ul style="list-style-type: none"> • 2018/19 – 0 dwellings • 2019/20 – 42 dwellings • 2020/21 – 84 dwellings • 2021/22 – 84 dwellings • 2022/23 – 84 dwellings <p>Total: 294</p> <p><u>Years 6 +</u></p> <ul style="list-style-type: none"> • 2023/24 – 56 dwellings <p>Total: 56</p> <p>Our Client is concerned that the delivery rates proposed for this site are unrealistic given a Reserved Matters application was only submitted by the Barratt and David Wilson Homes in May 2019. Based on the lead-in times set out in Table 2.2 of the SHLAA and given Reserved Matters has been submitted to the Council we would expect this site to start deliver dwellings until 2021/22 at best.</p> <p>As such, the trajectory should be amended as follows and 168 dwellings should be removed from the five year housing land supply:</p> <p><u>Years 1 - 5</u></p> <ul style="list-style-type: none"> • 2018/19 – 0 dwellings • 2019/20 – 0 dwellings • 2020/21 – 0 dwellings • 2021/22 – 42 dwellings • 2022/23 – 84 dwellings <p>Total: 126</p> <p><u>Years 6 +</u></p> <ul style="list-style-type: none"> • 2023/24 – 84 dwellings • 2024/25 – 84 dwellings • 2025/26 – 84 dwellings • 2026/27 – 56 dwellings <p>Total: 308</p> |  |

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|---------------------|---|-------------------------------|------------|--|--|---|
| <p>1646 (SHLAA)</p> | <p>Grappenhall Heys, Curzon Drive, Grappenhall Heys</p> | <p>New Town Reserved Land</p> | <p>400</p> | <p>Outline planning permission granted in January 2018</p> | <p>Our Client does not dispute that this site is suitable, available and deliverable over the Plan period. However, the SHLAA trajectory expects this site to deliver 360 dwellings within the first five years of the plan period as set out below.</p> <p><u>Years 1 - 5</u></p> <ul style="list-style-type: none"> • 2018/19 – 0 dwellings • 2019/20 – 72 dwellings • 2020/21 – 96 dwellings • 2021/22 – 96 dwellings • 2022/23 – 96 dwellings <p>Total: 360</p> <p><u>Years 6 +</u></p> <ul style="list-style-type: none"> • 2023/24 – 40 dwellings <p>Total: 40</p> <p>Our Client is concerned that the delivery rates proposed for this site are not achievable in the short term. Homes England and Rowland Homes submitted two concurrent Reserved Matters applications for 66 dwellings (Phase 1) (ref. 2019/34480) and 114 dwellings (Phase 1b) (ref. 2019/34481) in February 2019. Both applications were subsequently refused consent in May 2019 for reasons relating to:</p> <ul style="list-style-type: none"> • Highway safety; • Design; • Residential amenity impact; • Affordable housing; and • Ecological and landscape mitigation. <p>Our Client believes the reasons for refusal can be overcome over the Plan period. However, the refusal of the two applications will have a significant impact on the delivery rates for Phases 1 and 1b.</p> <p>As such, based on the lead-in times set out in Table 2.2 of the SHLAA for sites benefitting from outline planning permission we would expect this site to start delivering dwellings in 2022/23 at best. The trajectory should, therefore, be amended as follows and 288 dwellings should be removed from the five year housing land supply:</p> <p><u>Years 1 - 5</u></p> <ul style="list-style-type: none"> • 2018/19 – 0 dwellings • 2019/20 – 0 dwellings • 2020/21 – 0 dwellings • 2021/22 – 0 dwellings • 2022/23 – 72 dwellings <p>Total: 72</p> <p><u>Years 6 +</u></p> <ul style="list-style-type: none"> • 2023/24 – 96 dwellings |  |
|---------------------|---|-------------------------------|------------|--|--|---|

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| | | | | | <ul style="list-style-type: none">• 2024/25 – 96 dwellings• 2025/26 – 96 dwellings• 2026/27 – 40 dwellings Total: 328 | |
| TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE HOUSING LAND SUPPLY: | | | | | | 0 |
| TOTAL NUMBER OF DWELLINGS TO DISCOUNT FROM THE FIVE YEAR HOUSING LAND SUPPLY: | | | | | | 456 |