

Response 881

Respondent Details

Information	
[REDACTED]	[REDACTED]
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PART A - About You

1. Please complete the following: Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique ID number for future reference (pdf attachment).

Name of person completing the form: Gareth Salthouse [REDACTED]

Email address: [REDACTED]

2. What type of respondent are you? Please select all that apply.

An agent

3. Please complete the following:

Contact details	
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PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate? From the drop down list please select one option.

Draft Local Plan (as a whole)

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

None of the above

If a paragraph or policy sub-number then please use the box below to list:
Policies DEV1, MD1, MD2 and MD3. Section 10 (Site Allocations).

3. Do you consider the Draft Local Plan is: Please select one option in each row.

	Yes	No
Legally Compliant	X	
Sound		X
Compliant with the Duty to Co-operate	X	

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate. Please be as precise as possible.

Please see representations enclosed with this Form.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination (I understand details from Part A will be used for contact purposes)

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
It is essential that our client is able to submit representations orally at the examination given the complex nature of the issues raised.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each). If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'. If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: Strategic Represen [redacted].pdf - [Download](#)
- File: Representations - [redacted] - Site specific representations at Lymm.pdf - [Download](#)

You have just completed a Representation Form for Draft Local Plan (as a whole). What would you like to do now? Please select one option.

Complete the rest of the survey (Part C)



Representations to the Submission Draft

Warrington Local Plan Regulation 19

for



Emery Planning project number: 4324



Project : 4324
Site address : Warrington Local Plan
Client : ██████████
██████████

Date : June 2019
Author : Caroline Payne

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1. Introduction

- 1.1 These representations are submitted in relation to the public consultation on the Proposed Submission Version of the Warrington Local Plan published in March 2019.
- 1.2 We have significant concerns in relation to the proposed housing requirement and housing land supply. In particular we consider that the anticipated supply from SHLAA sites during the plan period has been significantly over-estimated. We also have concerns in relation to the anticipated timescales for delivery on the strategic allocations. As a result, we consider that insufficient allocations have been identified to meet the housing requirement.
- 1.3 Therefore to boost significantly the supply of housing land, we consider that additional allocations are required, particularly allocations of a smaller scale, which can come forward quickly to meet identified needs in the short term, unburdened by significant infrastructure requirements. We do not consider that the plan should be submitted for examination until these fundamental issues of soundness have been resolved.

2. National Planning Policy and Guidance

National Planning Policy Framework

2.1 The revised Framework was published in February 2019. It sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development. The Framework, taken as a whole, constitutes the Government's view of what sustainable development in England means in practice for the planning system.

2.2 Paragraph 11 requires plans and decisions to apply a presumption in favour of sustainable development. For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

2.3 Paragraph 35 provides the following in relation to soundness:

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs [19]; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

19. Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 60 of this Framework.

National Planning Practice Guidance (PPG)

- 2.4 The PPG was launched in March 2014. It replaced a number of practice guidance documents that were deleted when the PPG was published. Local Plan making is addressed under Section 12.

3. Policy DEV1: Housing requirement

3.1 Policy DEV1 sets a minimum requirement of 18,900 new dwellings for the period 2017 to 2037, at a rate of 847 dwellings per annum for the first 5 years from 2017 to 2021 and 978 dwellings per annum for the following 15 years from 2022 to 2037.

3.2 Paragraph 60 of the Framework provides:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

3.3 Local Housing Need is defined in Annex 2 of the Framework:

"The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework)."

3.4 The application of the standard methodology for Warrington results in a minimum local housing need of 909dpa based on the 2014-based household projections and following an adjustment to take account of affordability. However, the Council has chosen to identify a higher figure on the basis of an alternative approach. Paragraph 4.1.6 of the Submission Draft explains that the target has been set to ensure that there are sufficient homes to meet the Council's economic growth aspirations and to address affordability problems experienced by Warrington's younger residents who are struggling to get on the housing ladder.

3.5 The wider context is that using data published in September 2017 as part of the *Planning for the right homes in the right places* consultation, the standard method would, in aggregate, plan for around 266,000 homes across England. As the Government explained in the technical consultation on updates to national planning policy and guidance (October 2018), the Government expects the gap to be bridged by ambitious authorities going above their local housing need, including through housing deals with the Government.

3.6 Paragraph 2a-010 of the NPPG provides the following guidance :

"When might it be appropriate to plan for a higher housing need figure than the standard method indicates?"

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests."

3.7 The circumstances in Warrington provide clear justification for the application of an alternative method in accordance with the Framework and paragraph 2a-010 of the NPPG. These are as follows:

- There is a growth strategy in the area in the form of the Cheshire and Warrington Growth Deal, which provides funding to promote and facilitate additional growth.
- Recommendation 3 of the Update to the Economic Development Needs Assessment (EDNA)(2019) (see paragraph 8.10) states that the Oxford Baseline jobs forecast appears to underestimate the likely jobs generation from Warrington's potential future economic growth, allowing for policy and wider sub-regional change. The Economic Development Needs Assessment

therefore recommends that local policy looks to the Policy On Strategic Economic Plan (SEP) Scenarios (particularly Sensitivity Test Two: Variation on the Strategic Economic Plan) additional to the Oxford Baseline as more realistic indications of the numbers of jobs likely to be created.

- Warrington is committed to working with the LEP to deliver the Cheshire and Warrington Local Enterprise Partnership SEP (2017). There is a clear need for Warrington to align and maintain the identified employment growth within the SEP.

3.8 Having established that an alternative approach should be applied, paragraph 2a-015 of the Framework provides the following in relation to how such an approach would be tested at examination:

"If authorities use a different method how will this be tested at examination?"

Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point."

3.9 It is not simply the case, therefore, that a figure higher than the minimum starting point will be considered sound. It is necessary to demonstrate that the alternative method adequately reflects current and future demographic trends and market signals.

3.10 We therefore now turn to the alternative method applied by the Council, as set out in the Local Needs Housing Assessment (LHNA) (March 2019).

Cheshire and Warrington Growth Deal

3.11 Cheshire and Warrington has a Growth Deal with the Government. The following summary is provided on the first page of the document:

"The Cheshire and Warrington LEP has secured £142.7m from the Government's Local Growth Fund to support economic growth in the area – with £15.3m of new funding confirmed for 2015/16 and 36.7m for 2016/17 to 2021. This includes:

- *As part of the Government's ongoing commitment to the Cheshire and Warrington LEP an indicative award of a further £71.7m of funding for projects starting in 2016 and beyond; and £19m of funding which the Government has previously committed as part of Local Growth Deal funding to the area.*

- *The substantial investment from Government will bring forward at least £50m of additional investment from local partners and the private sector. Combined together this will create a total investment package of £192.7m for the Cheshire and Warrington area."*

3.12 In 2015 the Cheshire and Warrington Local Enterprise Partnership agreed an expansion to its Growth Deal with the Government which will see an extra £15.13m invested in Cheshire and Warrington between 2016 and 2021. This is in addition to the £142.7m of funding committed by the Government on 7 July 2014. Over the lifetime of its Deal (2015-2021) the Cheshire and Warrington Local Enterprise Partnership estimates that up to 12,000 new jobs could be created, 5,000 new homes built and that it has the potential to generate £280m public and private investment.

3.13 In view of the Government's stated expectation that authorities with Growth Deals will go above their minimum local housing need under the standard method, it should be viewed as extremely disappointing that the Council has decided to pursue a requirement which is only marginally higher than local housing need, and lower than the Preferred Options draft. In our view, the Council's approach is directly contrary to the Government's objective of boosting significantly the supply of housing land.

Alignment with employment growth

3.14 In accordance with paragraph 2a-015 of the NPPG, the alternative method must adequately reflect current and future demographic trends and market signals. The basis for the alternative method is to align housing growth with the plan's projected employment growth.

3.15 The LHNA reaches the broad conclusion that the Oxford Economic baseline growth is likely to be too low (12,700 jobs over the 2017-37 period). We concur with this conclusion which is consistent with the EDNA which states at paragraph 7.60 that:

"It is logical to assume that the Oxford Baseline jobs forecast...underestimates the real number of jobs that will be created."

3.16 The LHNA then goes on to reach the conclusion that the SEP growth is likely to be too high. It refers to the SEP growth as 24,800 jobs over the 2017-37 period. No justification is given as to why this is considered too high. Furthermore, the EDNA explains at paragraph 6.65 that the figure of 24,800 jobs was used to determine the housing numbers within the Preferred

Development Option document. Paragraph 6.58 of the EDNA clarifies that the SEP employment growth figure for Warrington to 2037 is 27,965. It explains that:

"If the 2017 work which developed the SEP, are apportioned on this basis, the employment growth predicted in the SEP would suggest that Warrington would increase its employment by 32,160 jobs to 2040 (or on a straight-line basis 27,965 by 2037)."

3.17 As the LHNA discounts the above options, the housing need figure of 945 dpa is therefore based on an adjusted SEP growth taking into account the lower baseline growth which results in an adjusted growth of 19,100 jobs over the 2017-27 period. This calculation is set out in Table 3 of the LHNA as shown below.

Table 3: Updating the Strategic Economic Plan (job growth estimates)

	Total 2017-37	Per annum
Old OE Baseline	18,420	921
Original SEP	24,800	1,240
Difference	6,380	319
New OE Baseline	12,700	635
+ Uplift	+6380	+319
Revised SEP	19,080	954

Source: OE January 2018 and GL Hearn

3.18 We consider this approach is too simplistic based on the origins of the adjustment to the SEP figure.

3.19 Furthermore, we raise concerns that the chosen jobs growth figure is extremely conservative as future jobs growth would be significantly below past long term trends. The LHNA considers the 'past trend' option at paragraph 3.13 to 3.17. It states that this would result in an annual jobs growth of over 2,100 per annum. This option is discounted for the following reasons:

"...the 1997-2010 period was one of very strong growth connected to the digital economy, internet shopping, the expanding public sector under the previous Labour Government. More locally strategic growth in Warrington including the development of Birchwood Park and the significant amount of jobs brought with it. It also includes other strategic growth including University Campus, a new intensive care unit and hospital wing at Warrington Hospital and Warrington Interchange.

More widely changes in the world economy (slowing of Chinese Economy, American isolation policies) and national economy (Brexit and continued austerity) are likely to slow the future rate of growth in comparison to historic rate. Extrapolating these levels of growth is therefore not reflective of a realistic level of growth a view shared by the leading economic forecasters."

- 3.20 It omits to mention that the past data is inclusive of the worst economic recession since records began. Considering this, it is unrealistic to expect future growth to be less than half the rate of past trends. Consequently, it is considered that the Council's justification for disregarding past historic rates is not sufficient and is not consistent with the overall aims of the plan.
- 3.21 We note that the EDNA considers different scenarios to establish the requirement for employment land. The preferred OAN forecast method for calculating employment land is a forward projection of land take up i.e. it takes Warrington's past market performance as a measure of likely future change (paragraph 7.59). It is unclear therefore why this is an unacceptable basis for calculating jobs growth.
- 3.22 Warrington has significantly outperformed other parts of the region in terms of delivering employment land and jobs growth. Growth initiatives such as the Liverpool Superport and growth prospects at the M56/M6 Junction and Port Warrington suggest that strong growth will continue. The approach selected does not reflect the strategically significant location of Warrington, in particular having regard to its connections to the M6, M56 and M62 and the wider policy aspirations for Warrington.
- 3.23 Warrington is seeking a jobs growth figure substantially lower than past trends which is inconsistent with the overall aims of the Local Plan.
- 3.24 Finally, we have concerns in relation to a number of the demographic assumptions applied in the LHNA:
- The assumed rate of double jobbing for Warrington is 3.1%. This is based on the proportion of people with more than one job using data from the Annual Population Survey. This is not considered to be directly applicable to the full time jobs created through the employment allocations in the emerging plan. In our view no such discount should be made.
 - Table 49 of the LHNA identifies the need for around 20% of new homes in Warrington to be provided to accommodate older persons. It is not clear from the evidence base how this has been factored into the jobs growth figure. It is considered that an uplift should be built into the requirement to ensure that the needs of older people are met.

3.25 In summary, the above factors indicate that additional dwellings are needed to align housing growth with jobs growth.

Market signals and affordable housing

3.26 The LHNA assesses affordable housing need against the SHMA (which had a base date of 2014). This assessment shows that the affordable need has increased from 250 per annum in the SHMA to 377 per annum. The LHNA analysis identifies a notable need for affordable housing, and it is clear that the provision of new affordable housing continues to be an important and pressing issue in the Borough.

3.27 Paragraph 2a-024 of the NPPG states:

"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."

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3.28 The LHNA states at paragraph 4.52 that:

"... the Council could be justified in increasing overall housing delivery to ensure the affordable housing need is met as best as possible. Indeed, any number above the standard methodology will also be delivering more affordable housing through developer contributions thus addressing this need sooner. "

3.29 We reiterate our previous comments that the proposed requirement would not align with jobs growth and economic aspirations. Furthermore, despite the notable need for affordable housing and the identification of a higher need than previously estimated in the SHMA, there is no uplift proposed to meet affordable housing needs.

3.30 The Viability Assessment (March 2019) prepared by BNP Paribas Real Estate tests the ability of the 14 potential strategic site allocations to absorb the requirements of the emerging Local Plan. The testing of the site allocations indicates that an emerging requirement of 20% affordable housing in the Town Centre and Inner Warrington and 30% affordable housing elsewhere will be viable over the plan period. The viability of the SHLAA sites does not appear to have been tested. There is therefore a heavy reliance on SHLAA sites and it is unclear how much affordable housing this will yield. In our view, the proposed requirement would fail to address issues of affordability.

Allowance for demolitions/clearance

- 3.31 The text should be amended to clarify that the requirement is a net figure. Furthermore, an allowance should be made for demolitions both in the housing requirement and the identified supply.
- 3.32 The annual monitoring reports for the years 2015/16, 2016/17 and 2017/18 indicate that demolitions in those years were relatively low standing at 20, 8 and 26 respectively. However, information before this time is limited. For example Table 2.4 of the SHLAA sets out the total number of gross completions over the period 2007/2008. The graph on page 15 of the 2018 Annual Monitoring Report shows completions from 2006/2007 through to 2017/2018. These figures are a net figure for 2016/17 and 2017/18 but pre this time the figures shown appear to be gross completions consistent with the figures set out in Table 2.4 of the SHLAA.
- 3.33 The evidence base should be updated to provide a clear position on the level of historic clearance that has taken place to enable an allowance to be built into the housing requirement.

Flexibility

- 3.34 Table 1: "Land Requirements over the Plan Period" includes a flexibility allowance of 10%. We note and are in agreement that this has increased from 5% in the Preferred Options consultation. We remain of the view that having regard to past delivery rates in Warrington and the consistent failure to meet housing requirements as highlighted by the Housing Delivery Test, a flexibility allowance of 20% should be built into the Local Plan. A report by the Local Plans Expert Group to the Communities Secretary and the Minister of Housing and Planning in March 2016 recommends that Local Plans should include a mechanism for the release of developable 'Reserve Sites' equivalent to 20% of their total housing requirement. This approach would give a reasonable degree of security that should sites not deliver at the rates anticipated, a 5 year housing land supply could still be maintained.

Phasing of housing

- 3.35 Policy DEV1 5 proposes that the housing requirement is to be stepped with 847 dwellings delivered per annum between 2017 and 2021 and 978 dwellings per annum from 2022 to 2037. We object to this approach.

- 3.36 The proposed phasing is not consistent with the assessment of local housing need, which even applying the standard methodology is 909dpa for the period 2017-2037. There is no evidence to suggest that the need will be less in the early years of the plan period.
- 3.37 The proposed phased approach is contrary to paragraph 59 of the Framework which requires the Council to support the Government's objective of 'significantly boosting' the supply of homes by bringing forward a sufficient amount and variety of land where it is needed. The Submission Version Local Plan is effectively proposing that unmet need should not just persist for a longer period but actually continue to accumulate for the first 5 years of the plan.
- 3.38 Paragraph 3-034 of the PPG provides the following guidance in relation to stepped or phased requirements:

"A stepped requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to set out evidence to support using stepped requirement figures, and not seek to unnecessarily delay meeting identified development needs. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs."

- 3.39 The justification for the proposed phasing is set out at paragraphs 4.1.20 and 4.1.21 of the Submission Version Local Plan where it is stated that the need to release Green Belt land and the lead in times for the major infrastructure required to support the Waterfront, Garden Suburb and South West Extension means that there will be a relatively lower level of housing delivery for the first 5 years of the Plan Period. Paragraph 4.1.21 goes on to state that the Government's planning guidance recognises that such an approach may be appropriate where strategic sites such as those being proposed by the Council will have a phased delivery or are likely to be delivered later in the plan period. In our view the limited justification provided falls significantly short of the evidence required to support the use of the stepped requirement figures.
- 3.40 The masterplanning and infrastructure constraints are valid points in the context of the strategic sites proposed for allocation in this plan. However, this clearly demonstrates that there is a need to diversify the supply through smaller deliverable sites which can readily integrate with local infrastructure. Such sites can boost the supply now and would accord with paragraph 68 of the Framework which states:

“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) *identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved”.*

3.41 Therefore in conclusion, the proposed phasing would unnecessarily delay meeting identified development needs, contrary to the PPG. The longstanding trend of housing undersupply would be allowed to persist even further into the future. The allocation of additional sites which are deliverable in the short term could significantly boost supply in the early years of the plan, eradicating the need to employ phasing. Insufficient consideration has been given to this potential strategy through the preparation of the plan and in particular the selection of site allocations.

Conclusions on the proposed housing requirement

3.42 The application of the standard methodology for Warrington results in a minimum local housing need of 909dpa. The Council has chosen to identify a higher figure on the basis of an alternative approach. The application of an alternative approach is justified by the evidence. However, on determining that an alternative approach is justified in principle, it is necessary to demonstrate that the alternative method adequately reflects current and future demographic trends and market signals. The assessment of need undertaken by the Council does not fulfil this requirement for a number of reasons:

- The Council is part of the Cheshire and Warrington Growth Deal which provides funding to drive economic growth. The Government expects such authorities to go above minimum local housing need as identified under the standard method to bridge the gap between the standard method figure of 266,000 homes nationally (based upon Warrington delivering 909dpa) and the target of 300,000. The proposed requirement is only marginally above local housing need and is lower than the Preferred Options.
- The proposed requirement would not align economic and housing growth. In particular:
 - Pessimistic assumptions have been made regarding jobs growth.
 - The double jobbing assumptions are unrealistic.

- Unrealistic economic activity rates have been used.
- The Council has not considered whether uplifting the requirement for affordable housing could assist in meeting the identified affordable housing need, in accordance with the NPPG.
- There has been no assessment of the need to make an allowance for clearance.

3.43 In our view the Council's approach does not accord with national planning policy and guidance, and is directly contrary to the Government's objective of boosting significantly the supply of housing.

4. Policy DEV1: Housing land supply

4.1 Policy DEV1: 'Housing Delivery' is not sound for the following reasons as set out in paragraph 35 of the Framework:

a) it has not been positively prepared

4.2 The policy does not provide a sound strategy for meeting the area's objectively assessed needs for two key reasons. First, it has over-estimated the supply of housing land from the existing urban area and second, the proposed distribution is highly concentrated within the four proposed strategic allocations. The projected lead-in times and build rates as relied upon by the authority are unrealistic, and the strategic allocations are very unlikely to deliver at the anticipated rates.

b) it is not justified

4.3 The policy does not provide an appropriate strategy compared to the reasonable alternative of allocating additional deliverable housing sites for development.

c) effective

4.4 The policies in the plan, particularly the large strategic allocations are unlikely to be delivered over the plan period.

d) it is not consistent with national policy

4.5 The policy fails to bring sufficient land forward at a rate to address objectively assessed needs over the plan period, which is contrary to paragraphs 20 (a), 23 and 67 of the Framework.

4.6 The policy also fails to identify a five year supply of deliverable housing land, which accords with the definition of deliverable as set out in the revised Framework and updated PPG. This is contrary to paragraphs 67 and 73 of the Framework.

Housing land supply over the plan period 2017-2037

Components of the supply

- 4.7 Table 1 “Land Requirements over the Plan Period” on page 34 shows in broad terms how the housing requirement of 945 dwellings per annum to 31st March 2037 will be achieved. The requirement from 2017 to 2037 is set out as 18,900 plus a flexibility allowance of 10% making a total requirement of 20,790.

Housing supply 2017-2037

- 4.8 Table 1 then sets out the anticipated supply. It concludes that sites identified in the 2018 SHLAA (9,226 dwellings including a small site allowance of 76 per annum) and sites that have been identified through the regeneration plans for the Town Centre, Warrington Waterfront and the wider Inner Warrington area have a deliverable/developable capacity in total of 13,726 dwellings.
- 4.9 The breakdown of the supply of sites in the urban area is set out in Table 1 “Urban Capacity Assessment to 2037” copied below:

Source	Total (dwelling units)
SHLAA 2018 (existing supply)	9,226
Additional supply (Wider Urban Area) to 2037	210
Completions from 17/18	359
TC Masterplanning Areas	6,549
Additional Small Sites Allowance to 2037	304
SHLAA sites in TC Masterplanning Areas	-2,919
Total	13,729

- 4.10 Having concluded that the total urban capacity is 13,729, Table 1: Land Requirements over the Plan Period, of the Local Plan concludes that there is a requirement to release sites with a capacity of 7,064 from the Green Belt. Table 1 from the Local Plan is copied below:

Annual target	945
2017 to 2037	18,900
Flexibility @ 10%	1,890
Total Requirement	20,790
Urban Capacity	13,726
Green Belt Requirement	7,064

4.11 In terms of the SHLAA sites, 9,226 dwellings have been identified from the following sources:

- **Large sites with planning permission:** Table 3.7 of the SHLAA shows that there are 3,568 dwellings on large sites that had planning permission at 1st April 2018. The table also shows that 2,576 dwellings on these sites are considered deliverable within years 1-5 (which will be 18/19-23/24 for the purposes of the SHLAA) and 992 are deliverable between years 6-10.
- **Large sites without planning permission:** Table 3.7 of the SHLAA states that there are 4,518 dwellings on large sites which have been identified in the SHLAA but did not have planning permission as of 1st April 2018. 599 dwellings on these sites are considered deliverable within years 1-5, 1,870 within years 6-10 and 2,049 within years 11-15.
- **Small sites windfall allowance:** The supply within the SHLAA includes an allowance of 76 per annum over 15 years.

4.12 We consider that there is an overreliance on SHLAA sites to deliver housing in the plan period for the following reasons.

4.13 First, the majority of the SHLAA sites are not proposed to be allocated and do not have planning permission. It is therefore not known whether planning permission would even be granted for residential development on the sites that still do not have permission.

4.14 Second, there is no guarantee that a planning application will even be made on a site identified in the SHLAA.

4.15 Third, even if planning permission is granted on a SHLAA site, there is no guarantee that it will be implemented.

4.16 Fourth, the detail provided in the SHLAA means that many of the sites have problems without any guarantee that they will be overcome, yet the Council relies on these sites to deliver dwellings in the plan period.

- 4.17 Fifth, a large number of the SHLAA sites are located on previously developed sites in the urban area and therefore we would expect to see detailed evidence that it is viable for these sites to be redeveloped for housing and at the density assumed.
- 4.18 The supply within the SHLAA includes a small site allowance of 76 per annum over 15 years. Paragraphs 2.60 to 2.63 of the SHLAA confirm that there has been an average of 76 dwellings delivered on small sites over the period 2007 to 2017. However, the figures appear to be gross. A net figure is not provided.
- 4.19 The 2018 SHLAA does not set out how many small sites had planning permission at 1st April 2018. Therefore, it is unclear as to how large any windfall allowance should be. The submission draft and its associated evidence base fall significantly short of providing the compelling evidence required to justify a windfall allowance as set out in paragraph 70 of the Framework, which states:

"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide 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. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens for example where development would cause harm to the local area."

- 4.20 The Council's windfall figure appears to be a gross figure and is therefore optimistic.

SHLAA densities

- 4.21 The Urban Capacity Study confirms that whilst net developable area ratios; build rates; lead in times remain unchanged from the previous SHLAA, a considerably higher density has been utilised for Inner Warrington (130dph) and the Town Centre (275dph). This is a significant increase from the 2017 SHLAA which used a density range of between 30 and 50 dwellings per hectare. Ultimately, the market will determine whether the delivery of apartments at this density will be sustained throughout the plan period but we comment on this below.
- 4.22 The justification for these increased densities is based on the information in 22 planning applications submitted between 2000 and 2018 and is set out in Appendix 4 of the SHLAA 2018. This information provides examples of high density development but it is unclear whether these 'high density' applications have been cherry picked as opposed to providing information on all

residential planning applications within the town centre and inner Warrington over the same period. We provide information on a cross section of these applications below:

- **Land at Winwick Street/John Street (2017/31394):** 362 apartments comprising:
 - 1 bed: 253 (70%)
 - 2 bed: 106 (29%)
 - 4 bed: 3 (8%)
- **107 Sankey Street (2018/32301):** 18 apartments comprising 100% 1 bed apartments.
- **78 Bridge Street, Warrington (2016/28080):** 8 apartments comprising 100% 1 bed apartments.
- **Former Club Wired, Mersey Street (2016/27808):** 10 apartments comprising:
 - 1 bed: 3 (30%)
 - 2 bed: 7 (70%)
- **Former Skate Academy (2017/31148):** 144 apartments comprising:
 - 1 bed: 34 (24%)
 - 2 bed: 110 (76%)
- **Formerly Town Hill Chambers (2017/31836):** 24 apartments comprising:
 - 1 bed: 9 (38%)
 - 2 bed: 15 (63%)

4.23 Assuming such a high density places a heavy reliance on the delivery of apartments and as demonstrated by the examples above is likely to lead to a focus on 1 and 2 bedroom apartments. This conflicts with the aims of Policy DEV2 of the Submission Version Local Plan which states that residential development should provide a mix of housing sizes and types. Table 3 of the Submission Version Local Plan shows that housing demand in terms of market housing comprises 0-5% for 1 bed units, 20-25% for 2 bed units, 50-55% for 3 bed units and 20-25% for 4+ bed units.

4.24 The increase in densities assumed in the 2018 SHLAA will inevitably have inflated the supply from such sites and we refer back to our concerns above that there is an overreliance on SHLAA sites to deliver.

Town Centre Masterplanning areas

4.25 The Council relies heavily on the delivery of the Town Centre Masterplanning Areas including the Town Centre, Inner Warrington and the Waterfront. The Urban Capacity Study indicates that a capacity figure for the Town Centre Masterplanning Area is 6,549 within the plan period.

4.26 This is clearly a complex site requiring significant areas of previously developed land and land assembly. The Council's aspirations for Inner Warrington and the Waterfront are long established and both identified as strategic locations in the Adopted Local Plan Core Strategy and yet the sites have not yet delivered.

4.27 In order for such sites to come forward it will be necessary to develop a new market for housing in an around the town centres. Given the uncertainty regarding the delivery in these areas we question the ability of these sites to deliver in full in the plan period. This is before viability in such locations is considered.

4.28 Reliance upon such sites to deliver the housing requirement is misplaced. Again this points to allocating additional sites which are deliverable in the short term.

Additional small sites allowance to 2037

4.29 Table 1 from the Urban Capacity Assessment shown above includes an additional allowance of 304 dwellings because the SHLAA only runs until 2033 but the plan period runs to 2037. There is no evidence to justify this additional allowance and the contribution from windfall sites in years 2033 to 2037 should be removed.

Summary in relation to housing supply from sites in the urban area

4.30 In summary, the Council considers that 9,226 dwellings should be considered developable on sites identified in the SHLAA. Taking into account other Town Centre Masterplanning Areas, the Council concludes there is a total Urban Capacity of 13, 726 dwellings. However, we consider that this figure is unrealistic and in particular reliance cannot be made on SHLAA sites without planning permission.

Housing Delivery Test

4.31 The definition of the Housing Delivery Test (HDT) is provided in the Glossary to the Framework on page 67 as follows:

“Housing Delivery Test: Measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November”

4.32 The HDT is measured as a percentage each year. The following implications apply where the HDT results delivery falls below specific thresholds.

4.33 Firstly, as explained in footnote 7 of the Framework, the tilted balance to the presumption in favour of sustainable development set out in paragraph 11(d) of the Framework applies where the HDT indicates that the delivery of housing was “substantially below” the housing requirement over the previous years. The transitional arrangements set out in Annex 1 of the Framework explain that “substantially below” means for the 2018 HDT results below 25%, for the 2019 HDT results below 45% and for the 2020 HDT and beyond below 75%.

4.34 Secondly, paragraph 73 and footnote 39 of the Framework explain that where the HDT result is below 85%, the 20% buffer will apply for purposes of calculating the five year housing land supply.

4.35 Thirdly, Paragraph 75 of the Framework explains that where the HDT result is below 95%, the local planning authority should prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years.

4.36 Consequently, given these implications, it is important that the Local Plan ensures that the HDT will be passed each year.

4.37 The HDT Measurement Rule Book (July 2018) explains that HDT is calculated as a percentage of net homes delivered against the “number of homes required”. However, it then explains that even where the latest adopted housing requirement figure is less than five years old “the number of homes required” means the lower of either the latest adopted housing requirement figure or the minimum annual local housing need figure. The transitional arrangements set out in paragraph 21 of the HDT Measurement Rule Book then explain that for the financial years

2015/16, 2016/17 and 2017/18, the minimum annual local housing need figure is replaced by household projections.

4.38 The HDT results for 2018 were published on 19th February 2019. The result for Warrington is summarised in the table below:

Table 4.1: Housing Delivery Test Results

	2015-16	2016-17	2017-18	TOTAL
Number of homes required	923	902	792	2,617
Number of homes delivered	595	492	359	1,446
HDT measurement				55%

Housing Delivery Test Action Plans

4.39 As can be seen from the above, Warrington delivered 1,446 new homes over the last three years against a "requirement" based on household projections over the same period of 2,617 dwellings. This results in a HDT measurement of 55%.

4.40 It is noted that the housing trajectory set out in Policy DEV1 proposes a Stepped Housing Trajectory with 847 homes per annum over the first 5 years of the plan. Paragraph 4.1.22 of the Submission Version states that the 5 year land supply and performance against the Government's Housing Delivery Test will therefore be assessed against the Stepped Housing Trajectory and not the annual average housing target of 945 homes per annum. Notwithstanding this, even if the past 3 years had been assessed against the Stepped Housing Trajectory as proposed in the Submission Version, the HDT measurement would be 57% (a requirement of 2,541 against 1,446 homes delivered) and the conclusion would remain the same.

4.41 Based on the table above, Warrington will need to prepare an action plan in line with national planning guidance to “*assess the causes of under-delivery and identify actions to increase delivery in future years*”.

4.42 Paragraph 3-068 of the PPG: “What is the Housing Delivery Test action plan?” states:

“The action plan is produced by the local planning authority where delivery is below 95% of their housing requirement. It will identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery.” (Our emphasis)

4.43 Given that an action plan is required when the HDT result is less than 95%, it is clear that under delivery even by a margin of 5% is not acceptable and measures need to be taken to improve delivery. In this case the under delivery is 45%.

4.44 Paragraph 3-073 of the PPG: “When will the action plan be implemented?” explains that local planning authorities should publish an action plan within 6 months of the publication of the HDT result i.e. by 19th August 2019. Therefore, given the timescales involved it is likely that we will have an opportunity to comment on the published action plans at the Examination.

4.45 The PPG sets out who the authorities will need to involve in the action plan. It then sets out at paragraph 3-071 the aspects that local planning authorities review as part of the action plan, including “whether the mix of sites identified is proving effective in delivering at the anticipated rate”. Paragraph 3-072 of the PPG then sets out the actions local planning authorities could consider as part of the action plan. In summary, whilst they were only introduced through the revised Framework, it is clear that the authorities which are required to prepare an action plan will need to undertake a substantial amount of work.

20% Buffer

4.46 In addition to needing to provide an action plan, the additional buffer of deliverable sites will be increased to 20% from 5% in Warrington in accordance with paragraph 73 of the Framework because there has been a “significant under delivery of housing over the previous three years” in these authorities.

Tilted balance

- 4.47 Under transitional arrangements set out in paragraph 215 of the Framework, the tilted balance to the presumption in favour of sustainable development in decision-making set out in paragraph 11(d) of the Framework is not triggered as a result of the HDT results in Warrington at this time. However, if the transitional arrangements were not in place, this would be the case. The transitional arrangements will end in November 2020 when the threshold for this trigger will be 75%.

Future HDT results

- 4.48 It is of note that the delivery of housing must increase in Warrington in the future if the HDT is to be passed because the housing requirement will increase once the transitional arrangements set out in the HDT Measurement Rule Book come to an end. Delivery therefore needs to improve significantly in a short time so that the HDT is passed.

Five year supply

- 4.49 Policy DEV1: Housing Delivery states at point 5 that as part of the housing trajectory (Appendix 1 of the Submission Version) the housing requirement is to be stepped to deliver 847 homes per annum in the first 5 years (2017 to 2021) and 978 homes for the following 15 years (2022 to 2037). It goes on to state at point 6 that should monitoring indicate 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 plan. However, neither the Submission Draft nor any of the supporting documents identify a supply of specific, deliverable sites plus a buffer for years one to five of the plan period i.e. 1st April 2017 to 31st March 2022. This is contrary to the requirements of the Framework as set out within paragraphs 67a and 73.
- 4.50 Paragraph 74 of the Framework gives the Council the opportunity to demonstrate a confirmed five year supply of specific deliverable sites through the plan examination process. However, paragraph 3-049 of the PPG: "How can local authorities demonstrate that they have a confirmed 5 year land supply as part of the plan examination?" confirms that if the Council chose to do so it needed to indicate that it was seeking to do so at the Regulation 19 stage i.e. during the current consultation. This was not the case and therefore the Council's five year supply will not be "confirmed" through the Local Plan examination process.

4.51 Notwithstanding this, the Council will still need to be able to demonstrate a five year housing land supply for the plan to be found sound. Indeed, paragraph 3-038 of the PPG: "When should an authority demonstrate a 5 year housing land supply?" states:

"In principle an authority will need to be able to demonstrate a 5 year land supply at any point to deal with applications and appeals, unless it is choosing to confirm its 5 year land supply, in which case it need demonstrate it only once per year."

4.52 This paragraph of the PPG should be read alongside paragraph 3-028 of the PPG: "What is a 5 year land supply?", which states:

"A 5 year land supply is a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against a housing requirement set out in adopted strategic policies, or against a local housing need figure where appropriate in accordance with paragraph 73 of the National Planning Policy Framework."

4.53 As above, the Council has not identified a five year supply, which is contrary to the Framework and this section of the PPG.

4.54 We therefore assume that the Council will produce a five year housing land supply position statement before or during the Local Plan examination. Failure to do so at this stage is unacceptable and creates procedural difficulties. The position statement will be expected to provide all of the information as set out in paragraphs 3-048 and 3-036 of the PPG.

4.55 Paragraph 3-048 of the PPG: "What information will annual reviews of 5 year land supply, including annual position statements, need to include?" (our emphasis) states:

"Assessments need to be realistic and made publicly available in an accessible format as soon as they have been completed. Assessments will be expected to include:

- for sites with detailed planning permission, details of numbers of homes under construction and completed each year; and where delivery has either exceeded or not progressed as expected, a commentary indicating the reasons for acceleration or delays to commencement on site or effects on build out rates;*
- for small sites, details of their current planning status and record of completions and homes under construction by site;*
- for sites with outline consent or allocated in adopted plans (or with permission in principle identified on Part 2 of brownfield land registers, and where included in the 5 year housing land supply), information and clear*

evidence that there will be housing completions on site within 5 years, including current planning status, timescales and progress towards detailed permission;

- *permissions granted for windfall development by year and how this compares with the windfall allowance;*
- *details of demolitions and planned demolitions which will have an impact on net completions;*
- *total net completions from the plan base date by year (broken down into types of development e.g. affordable housing); and*
- *the 5 year land supply calculation clearly indicating buffers and shortfalls and the number of years of supply.” (our emphasis)*

4.56 Paragraph 3-036 of the PPG: “What constitutes a ‘deliverable site’ in the context of housing policy?” provides further information. It states:

“For sites with outline planning permission, permission in principle, allocated in a development plan or identified on a brownfield register, where clear evidence is required to demonstrate that housing completions will begin on site within 5 years, this evidence may include:

- *any progress being made towards the submission of an application;*
- *any progress with site assessment work; and*
- *any relevant information about site viability, ownership constraints or infrastructure provision.*

For example:

- *a statement of common ground between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates.*
- *a hybrid planning permission for large sites which links to a planning performance agreement that sets out the timescale for conclusion of reserved matters applications and discharge of conditions.”*

4.57 The Council has not provided any of the information required by paragraphs 3-036 and 3-048 in the Submission Draft or the evidence base. Once the Council provide the information required either before the plan is submitted or during the course of the examination, we respectfully request the opportunity to comment.

Five year housing requirement

4.58 The base date of the plan is 2017. However, as the base date of the SHLAA is 2018, the tables below also utilise a base date of 2018. The five year housing requirement will be five times the annual housing requirement plus buffer. Without prejudice to our objections to the proposed housing requirement elsewhere, the annual requirement proposed for the first five years of the plan period as set out in the stepped housing trajectory is 847 homes per annum from 18/19 to 21/22 plus 978 for 22/23 and the 2018 HDT results mean that the 20% buffer applies. Completions from 2017-2018 were 359, a shortfall of 488 against the requirement. Therefore the requirement for the 5 year period is currently 1,165 dwellings per annum as summarised in the following table:

Table 4.2: 5-year Housing Requirement

	Requirement (18/19- 22/23)	
A	5-year net local plan housing requirement (847 x 4 years + 978)	4,366
B	Accumulated backlog 2017-2018 (847 requirement-359 completions)	488
C	Total 5-year requirement (A+B)	4,854
D	20% Buffer (20% of C)	971
E	Total supply to be demonstrated (C+ D)	5,825
F	Annual average (E / 5)	1,165

Five year housing land supply

What constitutes a 'deliverable' site

4.59 The definition of what constitutes a 'deliverable' site is set out on page 66 of the Framework as follows:

"Deliverable: 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 of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

4.60 The Framework does not provide any further detail on the "clear evidence" referred to in paragraph b) above, but further information is set out in paragraphs 3-036 and 3-048 of the PPG as we have described above.

4.61 The 2018 SHLAA sets out at Table 3.7 the deliverable and developable housing land over the next 15 years. Extracting the first 5 years from the table shows a five year supply of 3,555 dwellings at 1st April 2018 from the following sources:

Table 4.3: 5-year Housing Supply

	Source	Number of dwellings in the five year supply (18/19-22/23)	Percentage of 5YHLS at 01/04/18
A	Large sites – with planning permission	2576	72%
B	Large sites – without planning permission	599	17%
C	Small sites – allowance (76 x 5)	380	11%
	Total	3,555	

4.62 This would equate to a shortfall of 2,270 dwellings when compared to the requirement set out in Table 4.2 above.

4.63 Having regard to the definition of deliverable in the Framework, we comment on the components of the supply as summarised below:

- Large sites – with planning permission – where these sites are under construction, the definition of deliverable is met and these should be included in the supply unless there is clear evidence that homes will not be delivered in five years. Where these sites have planning permission but have not yet started:
 - sites with full planning permission for major development 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)

- sites with outline planning permission for major development should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. The SHLAA assumes some sites with outline planning permission will be delivered in the first five years. For example, the Appleton Cross site, one of the HCA sites within the Garden Suburb allocation has outline consent but no reserved matters approval and is expected to deliver 294 units by 2022.
- Large sites – without planning permission - these do not meet the definition set out in the Framework and should not be included in the supply. Whilst the previous PPG stated that sites without planning permission which were not allocated in a local plan “may” be included in the five year supply, this is no longer the case. The SHLAA defines some sites without planning permission as ‘deliverable’. Table 3.4 of the SHLAA indicates that 599 units without planning permission at 1st April 2018 are considered deliverable.
- Small sites allowance – the 2018 SHLAA does not identify small sites with planning permission. Paragraph 73 of the Framework requires “specific deliverable sites” to be identified. Therefore the small sites with planning permission must be identified. In terms of the small sites windfall allowance, compelling evidence is required for the inclusion of an allowance under paragraph 70 of the Framework.

4.64 The housing trajectory attached at Appendix 2 of the Urban Capacity Assessment 2019 is also summarised below and shows anticipated completions from the allocations. This includes the small site allowance and allocations with no consents.

Table 4.4: Forecast completions

	Year	18/19	19/20	20/21	21/22	22/23	TOTAL
A	Town Centre			415	323	517	1,255
B	SHLAA sites from wider urban area	251	164	421	546	231	1,613
C	Warrington Waterfront		110	205	187	90	592
D	Garden Suburb (HCA sites)	45	204	225	180	180	834
E	SHLAA sites from settlements	18	16	59	55	35	183
F	GB release	0	0	0	0	176	176
G	Other SHLAA sites	12	21	15	0	0	48
H	Small sites allowance	76	76	76	76	76	380

I	Total anticipated completions (Sum of A:H)	402	591	1,416	1,367	1,305	5,081
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- 4.65 The proposed strategy would not provide a 5-year housing land supply on adoption of the plan. Even on the Council's own figures, which include for unrealistic delivery rates from a number of sources (discussed in more detail below).
- 4.66 The proposal to allow unmet need to continue to accumulate in the early years of the plan is wholly out of step with the emphasis in the Framework on boosting significantly the supply of housing. We consider that the proposed strategy must be amended to provide sufficient land to ensure a 5-year housing land supply on adoption.
- 4.67 In summary, contrary to the requirements of the Framework as set out within paragraphs 67a) and 73, the Council has not demonstrated it has a "deliverable" five year housing land supply. Given the reliance on SHLAA sites as set out in its latest position at 1st April 2018, once the definition has been applied, it is unlikely that the Council will be able to demonstrate a five year housing land supply.
- 4.68 Notwithstanding this, once the Council provide the information required either before the plan is submitted or during the course of the examination, we respectfully request the opportunity to comment.
- 4.69 To address the housing land supply issues that we have identified above, we consider that additional deliverable allocations are required. In particular, there is a need to diversify the supply through allocations of a smaller scale, which can come forward quickly to meet identified needs in the short term, unburdened by significant infrastructure requirements.
- 4.70 The allocation of additional sites that are available and achievable for delivery in the short term is necessary to achieve the overall housing requirement, and also to provide a 5-year supply on adoption of the plan.

5. Chapter 10: Main development areas and site allocations

Policy MD1: Warrington Waterfront

- 5.1 The Warrington Waterfront is proposed to 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. The new community will be supported by:
- A new primary school.
 - A new local centre comprising shops, health facility and other community facilities.
 - A major new country park at Arpley Meadows.
- 5.2 The housing trajectory indicates that the Waterfront site will deliver 502 dwellings in years 1-5 with 110 homes being delivered in 2019/20. A total of 2,542 dwellings are envisaged to be delivered over the plan period.
- 5.3 Policy MD1.2 confirms that the Council will require the preparation of a masterplan for the entire site allocation together with a delivery strategy and phasing plan to ensure comprehensive and coordinated development. It is understood that a working draft Development Framework was prepared in March 2019 but this does not include any information on delivery or phasing at this stage.
- 5.4 No development will be permitted until funding has been secured and a programme of delivery has been confirmed for the Western Link Road.
- 5.5 In April 2019, the DfT confirmed it was committed to funding £142.5m of the estimated total £212m build cost of the Western Link road. The Council now intends to progress work on the road over the next two years to develop detailed designs, submit a planning application together with relevant ecological, environmental and flood risk assessments and acquire land required for the road. In addition, the Council will need to develop an extensive work schedule for the delivery of the Western Link which will constitute one of the largest engineering projects in the North West. The programme of delivery for the Western Link is therefore unclear at present and timescales will be dependent on a number of factors including the time taken to obtain planning permission.

- 5.6 Furthermore, the first operation of the expanded Port Warrington will not be permitted until the expansion of either the berth or the railway connection has been completed and a programme for the implementation of the subsequent berth extension or railway infrastructure has been confirmed. This is part and parcel of the delivery of the new urban quarter.
- 5.7 Based on these factors, it is unclear how 502 dwellings could be delivered in years 1-5, a further 970 dwellings in years 6-10 and then a further 908 in years 11-15. The assumptions appear to be unrealistic.

Policy MD2: Warrington Garden Suburb

- 5.8 The Warrington Garden Suburb is expected to deliver approximately 7,100 homes and 116 hectares of employment land. Around 5,100 homes and all of the employment land will be delivered in the plan period.
- 5.9 The policy states that a Development Framework will be prepared as a Supplementary Planning Document (SPD). New homes are expected to be delivered in the Garden Suburb across the following locations:
- Grappenhall Heys: 2,800 homes (2,100 within the plan period)
 - Appleton Cross/Pewterspear: 2,100 homes (1,500 within the plan period)
 - New Garden Village adjacent to A50: 1,800 homes (1,000 within the plan period)
 - Garden Suburb Neighbourhood Centre: 700 homes (500 within the plan period)
- 5.10 The housing trajectory attached at Appendix 2 to the Urban Capacity Assessment 2019 sets out the following trajectory for the Garden Suburb:

Table 6.1: Trajectory for delivery of Garden suburb

	Years 1-5 (2017/18-2021/22)	Years 6-10 (2022/23-2026/27)	Years 11-15 (2027/28-2031/32)	Years 16-20 (2032/33-2036-37)	TOTAL
HCA sites	654	276	0	0	930
AECOM Masterplanning (GB release)	0	1099	1641	1461	4201
	654	1,375	1,641	1,461	5,131

5.11 The Council therefore considers that the Garden City Suburb will deliver an average of 275 dwellings per annum from years 6 to 10. This would be preceded by 654 dwellings in years 1-5 on the non-Green Belt part of the site. The dwellings subject to the AECOM Masterplanning are expected to commence delivery in 2023/24 i.e. in just 4 years time. These lead-in and delivery expectations are extremely ambitious and in our view are unrealistic.

5.12 Paragraph 023 (Reference ID: 3-023-2014-306) states that local planning authorities should use 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 scale sites.

5.13 In terms of lead-in times, the Council will need to consider on a site by site basis:

- how long a planning application will take to prepare, submit and be determined;
- how long it will take for the s106 agreement to be negotiated and agreed;
- whether an allowance needs to be made for the site to be sold to a developer/housebuilder;
- how long it will take for applications for reserved matters and discharge of conditions to be made, considered and approved;
- whether there is infrastructure that needs to be put in place before the site can start delivering dwellings and how long this will take; and
- whether there are any other site-specific considerations which would affect a start on site.

- 5.14 The lead-in times are particularly important for the very large allocations such as this, which by their nature will have a range of issues to be addressed through applications and will need sufficient time for section 106 agreements to be executed, a start to be made and infrastructure put in place.
- 5.15 Paragraph 10.2.17 of the Submission Local Plan states that the first phase of residential development within the Garden Suburb is underway with permission already granted for the Homes England sites at Pewterspear, Appleton Cross and Grappenhall Heys. The Pewterspear site has outline and reserved matters consent for 180 units. However, whilst outline planning permission was granted for 400 dwellings on the Grappenhall Heys site in 2017 (2017/29929), the first two reserved matters applications for 66 dwellings (2019/34480) and 114 dwellings (2019/34481) were refused consent in May 2019. Furthermore, the Appleton Cross site was also granted outline planning permission for 370 in 2017 (2017/29930) but, an application for reserved matters has not yet been submitted. These sites account for the delivery in the first five years of the plan. Given the position with the applications at the Grappenhall Heys site and Appleton Cross site there is no certainty that delivery will occur at these rates.
- 5.16 In terms of the wider masterplanning, a Development Framework dated March 2019 has been prepared for the Warrington Garden Suburb by AECOM to inform the emerging Local Plan. Whilst the Framework provides overarching design principles, it provides little in the way of how the suburb will be delivered. The conclusions set out a phasing strategy indicating that the allocation will be delivered in four phases within the plan period. Given the vast area covered by the proposed allocation there will be significant challenges in terms of land assembly and land equalization to overcome. The Development Framework recognises that there will need to be ongoing collaboration between the public sector, landowners/promoters and statutory authorities to arrive at solutions that are deliverable.
- 5.17 In terms of the proposed lead in times for the Garden City Suburb, a significant amount of infrastructure is required. This includes a network of new distributor roads, a new secondary school, up to 4 new primary schools, a major new park, district centre, health facilities and leisure facilities. The Submission Local Plan acknowledges that no further residential development to the 950 units on the above sites can come forward until:
- The funding and the programme for the delivery of a strategic link to connect the Garden Suburb to the local and strategic network has been confirmed.

- The funding and programme for delivery of the Green Infrastructure Network including Country Park.
- The funding and programme for the delivery of community infrastructure within the neighbourhood centre or the relevant Garden Village.

5.18 Evidence from research undertaken by Nathaniel Lichfield & Partners published in November 2016 ('Start to Finish – how quickly do large-scale housing sites deliver?') highlights that the average lead-in time for large sites (above 500 dwellings) prior to submission of the first planning application was 3.9 years. Further, the average length of the period from validation to an implementable permission (but still excluding any discharge of conditions) for sites of 2,000+ dwellings was 6.1 years. The average for all large sites (above 500 dwellings) was 5 years. The period between permission being granted and delivery of the first completions is however shorter for the very large sites at circa 0.8 years for schemes of 2,000 dwellings or more. This indicates a total lead-in to delivery for the very large schemes of approaching 11 years on average. The proposed delivery rates for the Garden City Suburb are extremely ambitious and in our view are unrealistic.

5.19 Having regard to the above, the proposed build rates are unprecedented and it is unclear how these could be achieved within a realistic phasing plan and the land ownership across the site.

Policy MD3: South West Urban Extension

5.20 The Submission Draft proposes to remove 112 ha of land to the south west of Warrington from the Green Belt and allocate this as a sustainable urban extension. It is intended that this will deliver a new residential community of around 1,600 homes and the housing trajectory indicates that it will commence delivery of units in 2023/24 at a rate of approximately 117 dwellings per annum.

5.21 We have concerns in terms of the anticipated timescales for delivery. MDA3.2: Delivery and Phasing confirms that no development will be permitted until funding has been secured and a programme of delivery has been confirmed for the Western Link. The trajectory set out in Appendix 2 of the Urban Capacity Study indicates that the South West Extension will deliver dwellings in 2023/24, again in just 4 years time. This is entirely inconsistent with the evidence set out above from Nathaniel Lichfield and Partners. We refer to our comments in respect of the Warrington Waterfront allocation in this regard.

- 5.22 The Submission Draft no longer includes the western part of the allocation adjacent to Moore (as proposed in the Preferred Options). This part of the allocation was not constrained by the Western Link or the HSE exclusion zone and was therefore a logical early phase.
- 5.23 Furthermore, full details of the programme and funding for delivery of the primary school, health centre, Local Plan and other necessary infrastructure will need to be agreed by the Council before the first phase of the development is permitted to come forward.
- 5.24 Given the significant lead in times associated within the project, we consider it extremely unlikely that the first completions on the South West Urban Extension will take place in 2023/24.

Summary of main development areas and site allocations

- 5.25 The Submission Version Local Plan relies heavily on the allocation of larger strategic sites and that these will commence delivery at extremely ambitious rates. The proposed lead in times and build rates are unprecedented and it is unclear how these could be achieved within a realistic phasing plan and the land ownership issues across the Waterfront, South West Extension and Garden Suburb Allocations.
- 5.26 These are in our view, unrealistic expectations that will have implications both for the 5 years housing land supply and also for the supply over the plan period. To address these issues, we consider that additional deliverable allocations are required. The Local Plan Submission Version needs to diversify the supply through allocations of a smaller scale, which can come forward quickly to meet identified needs in the short term, unburdened by significant infrastructure requirements.

6. Safeguarded land

- 6.1 The Preferred Development Option proposed to designate safeguarded land sufficient to accommodate 9 years worth of housing land based on the then OAN and 5 years worth of employment land based on the current requirements. Our representations to the Regulation 18 consultation set out that we considered this to be wholly insufficient.
- 6.2 The Submission draft does not make any allowance for safeguarded land. We consider that additional land should be safeguarded now to meet the needs of future development beyond 2037.
- 6.3 Paragraph 133 of the Framework identifies that the essential characteristics of Green Belts are their openness and their permanence.
- 6.4 Paragraph 136 requires strategic policies to establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.
- 6.5 Paragraph 139 states that when defining Green Belt boundaries, plans should (amongst other requirements):
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period (our emphasis)
- 6.6 Therefore national policy is clear on the need ensure that Green Belt boundaries will not need to be altered at the end of the plan period (currently 2037). This is a critical aspect to achieving the intended permanence in the long term. The appropriate mechanism for achieving this is through the provision of a sufficient quantum of safeguarded land.
- 6.7 How much safeguarded land is needed in practice was considered in detail at the Cheshire East Local Plan Strategy examination. In that case it was determined that sufficient safeguarded land should be made available for another full plan period following the end of

the current plan period. Paragraph 99 of the Cheshire East Local Plan Strategy Inspector's report states:

"The overall amount of proposed Safeguarded Land is intended to meet longer-term development needs stretching well beyond the end of the current plan period; in fact, taking account of other sources of land, it should be sufficient for another full 15-year period beyond 2030, so that the Green Belt boundary defined in the CELPS-PC will not need to be amended until at least 2045."

6.8 It is important to note that the Cheshire East Local Plan Strategy examination was suspended to allow, amongst other reasons, further work to take place in relation to the amount of safeguarded land. This is made clear in the Further Interim Views of the Inspector which form Appendix 2 to the Inspector's report. Paragraph 49 of the Further Interim Views states:

"The SLAN & SLTA consider various options for Safeguarded Land, including different amounts and timescales, and conclude that the identification of 200ha of land (the mid-point of a range between 155-244ha) would be sufficient to accommodate development needs for a period of 8-10 years beyond the current plan period; with other sources of land outside the Green Belt, including brownfield/recycled and windfall sites, this would meet predicted development requirements for a period of 15 years beyond 2030."

6.9 Paragraph 50 concludes that this quantum of safeguarded land would be sufficient:

"There is little guidance available on defining the appropriate amount of Safeguarded Land, but after considering best practice, an approach which considers a 10-15 year period beyond the end of the current plan period seems reasonable in the context of Cheshire East; it strikes a reasonable balance between avoiding the need to review the Green Belt at the end of the current plan period and avoiding unnecessary releases of Green Belt land at this time."

6.10 Therefore in summary, sufficient safeguarded land should be provided to ensure that the current requirement could be carried forward to the next plan period (i.e. to at least 2053, assuming that the current plan is not adopted until 2022) without the need for Green Belt release. In practice the minimum requirement is to provide a similar amount of safeguarded land to the amount of Green Belt being released for development in this plan period. Ideally more should be provided, to allow flexibility for higher growth and to increase the permanence of the Green Belt.

6.11 The plan must be amended to include the designation of safeguarded land.

7. Site-selection process

- 7.1 There is no evidence that the Council has carried out any informed assessment as to the merits of sites selected for development and sites not selected for development through the Submission Version Local Plan. There is nothing within the evidence base that the Council has considered a site selection process methodology whereby it is made clear as to how sites have been 'sieved'.
- 7.2 A site selection process is critical to the local plan process as it allows for a clear and transparent process to be followed. It also helps to ensure that the plan represents an appropriate strategy as it allows for potential sites to be tested against the Council's overall vision and objectives. The site selection process should inherently be linked with the overall strategy for the emerging local plan i.e. sites selected serve a meaningful planning purpose.
- 7.3 However, an informed assessment of the Council's site selection process cannot be carried out on the basis of the evidence available. There is nothing within the evidence base documents that provides a rationale as to how sites have been accepted or otherwise rejected as potential site allocations. For instance, the Development Options and Site Assessment Technical Report & Site Assessment Proformas simply provide brief commentary on selected sites following a 'workshop' (it is not made clear what the nature and purpose of this workshop was and who was present). Notwithstanding the brevity of any assessment carried out, there is no overarching assessment as to why certain sites have then been selected as site allocations.
- 7.4 This falls significantly short of what is required to ensure a fair and transparent site selection process that contributes to the emerging local plan overall vision and objectives. This is a fundamental and overriding flaw in the preparation of the local plan. This is contrary to the PPG, which advises that all land should be assessed together as part of plan preparation to identify which sites are the most suitable and deliverable for a particular use (paragraph 3-001).

8. Summary and conclusions

8.1 We consider that the Proposed Submission Version Local Plan 2019 has a number of failings:

- The overall housing requirement of 18,900 dwellings over the plan period is too low. The Council has chosen to identify a requirement only marginally higher figure (4%) than the local housing need figure provided by the standard method. The circumstances in Warrington provide clear justification for planning for housing need figure. These are as follows:
 - The Council is part of the Cheshire and Warrington Growth Deal which provides funding to drive economic growth. The Government expects such authorities to go above minimum local need as identified under the standard method to bridge the gap between the standard method figure of 266,000 homes nationally and the target of 300,000.
 - The Council's jobs growth projections are unduly pessimistic. It is seeking a jobs growth figure substantially lower than past trends which is inconsistent with the overall aims of the Local Plan.
 - There are concerns with a number of the demographic assumptions applied in the LHNA in particular the assumed rate of double jobbing and the need for older persons housing.
 - The identified need for affordable housing will not be met. The LHNA shows that there has been an increase in affordable need from 250 dwellings per annum in the SHMA to 377 dwellings per annum. Under such circumstances the Council should strongly consider an increase in the housing requirement in accordance with the PPG.
- There is a significant overreliance on SHLAA sites. Not all of the sites identified in the SHLAA will come forward for development and a large discount is required for this element of the supply.
- There is a reliance on large scale strategic sites to meet the housing requirement over the plan period. The lead in times for these sites will be significant and consequently the anticipated build rates for the plan period are not realistic.
- The plan has insufficient flexibility to respond to change, for example the non-delivery of strategic sites in part or in full. In the absence of such flexibility, there is a real risk that the borough will not be able to demonstrate a sufficient supply of housing land.
- As result of the above two points, insufficient housing land has been identified in the short term, and overall to meet the identified requirement (let alone a higher figure). The supply of housing land should be increased and diversified through the addition of deliverable sites, which are not burdened by significant infrastructure requirements.

- There is no provision of safeguarded land. A significant amount of additional safeguarded land should be identified to meet development needs post 2037.
- There is no evidence that the Council has undertaken an informed site selection process to potential development sites and this is a fundamental flaw in the preparation of the Submission Version Local Plan.

8.2 In summary, to boost significantly the supply of housing land, we consider that additional allocations are required. This would provide a reasonable prospect of the requirement being met. We do not consider that the plan should be submitted for examination until these fundamental issues of soundness have been resolved.

8.3 Representations specifically in relation to the omission sites are submitted under separate cover.



Local Plan Representations

Warrington Local Plan Submission Version Consultation – 1)
Land off Pepper Street and Sutch Lane, Lymm 2) Land
south of Sutch Lane, Lymm

For: [REDACTED]

Emery Planning Project No. 4324

Project : 4324
Document : Warrington Borough
Local Plan Submission
Version Consultation
Client : [REDACTED]
Date : June 2019
Author : Gareth Salthouse
Approved by : John Coxon

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1. Introduction

- 1.1 Emery Planning is instructed by our clients, [REDACTED], to prepare and submit representations to the Warrington Local Plan Submission Version consultation.
- 1.2 This Statement should be read alongside our representations to the strategic questions, submitted on behalf of a number of clients. This Statement relates to our client's specific-site interests within Lymm as follows:
- Land off Pepper Street and Sutch Lane, Lymm.
 - Land south of Sutch Lane, Lymm (to include the provision of a new link road between Oughtrington Lane and Pepper Street).
- 1.3 These parcels are described in detail within this Statement and were both promoted through the Warrington 'Call for Sites' exercise carried out by the Council in 2016, and the subsequent Preferred Option consultation. We enclose plans showing the two parcels of land edged red at **EP1** and **EP2** of this Statement.
- 1.1 In summary, these representations propose the allocation of the two sites in order to meet identified housing needs within Lymm.

2. Local Plan Evidence Base

Site selection process

- 2.1 In the first instance, there is no evidence that the Council has carried out any informed assessment as to the merits of sites selected for development and sites not selected for development through the Submission Version Local Plan. There is nothing within the evidence base that the Council has considered a site selection process methodology whereby it is made clear as to how sites have been 'sieved'.
- 2.2 A site selection process is critical to the local plan process as it allows for a clear and transparent process to be followed. It also helps to ensure that the plan represents an appropriate strategy as it allows for potential sites to be tested against the Council's overall vision and objectives. The site selection process should inherently be linked with the overall strategy for the emerging local plan i.e. sites selected serve a meaningful planning purpose.
- 2.3 An informed assessment of the Council's site selection process cannot be carried out on the basis of the evidence available. Again, there is nothing within the evidence base documents that provides a rationale as to how sites have been accepted or otherwise rejected as potential site allocations. For instance, the Development Options and Site Assessment Technical Report & Site Assessment Proformas simply provide brief commentary on selected sites following a 'workshop' (it is not made clear what the nature and purpose of this workshop was and who was present). Notwithstanding the brevity of any assessment carried out, there is no overarching assessment as to why certain sites have then been selected as site allocations.
- 2.4 This falls significantly short of what is required to ensure a fair and transparent site selection process that contributes to the emerging local plan overall vision and objectives. This is a fundamental and overriding flaw in the preparation of the local plan. This is contrary to the PPG, which advises that all land should be assessed together as part of plan preparation to identify which sites are the most suitable and deliverable for a particular use (paragraph 3-001).
- 2.5 In the case of the two omission sites subject to this Statement, neither has been subject to any form of assessment through the emerging local plan. Although promoted through the 2016 Call for Sites and subsequent 2017 Preferred Option Consultation, neither site has been referenced through the Development Options and Site Assessment Technical Report & Site Assessment Proformas. Our client lodged detailed highways information on both sites in terms of highways

improvements that could be delivered as part of potential site allocations, and the Council appears to have had no regard for this.

Draft Policies OS6 & OS8 (Pool Lane & Warrington Road, Lymm)

- 2.6 We highlighted these two draft site allocations in order to emphasise the lack of robustness and soundness through the Council's approach to selecting sites for development. Draft Policy OS6 (Pool Lane) requires 40 new homes and Draft Policy OS8 (Warrington Road) requires 100 new homes.
- 2.7 The site at OS6 is located within a Flood Zone 2/3 i.e. at high risk of flooding. The Warrington SFRA Level 1 notes that 99.07% of the site is within a Flood Zone 2 and the remainder is Flood Zone 3. The site at OS8 is identified as being almost 50% Flood Zone 2. See the Flood Risk Maps below with the two draft allocations edged red:



- 2.8 The SFRA Level 1 recommends a sequential assessment in the first instance for both potential development sites. We are not aware of any evidence that suggests that the Council has carried out any such assessment. This is a fundamental flaw in the plan-making process.
- 2.9 The general approach to managing flood risk is clearly set out through national planning policy guidance. For instance, the PPG states the following at paragraph 07-018:

This general approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. The aim should be to keep development out of medium and high flood risk areas (Flood Zones 2 and 3) and other areas affected by other sources of flooding where possible.

Application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered and developers do not waste their time promoting proposals which are inappropriate on flood risk grounds.

2.10 Para. 7-019 of the PPG states the following:

The Sequential Test ensures that a sequential approach is followed to steer new development to areas with the lowest probability of flooding.

2.11 Paragraph 7-022 of the PPG states the following:

Where other sustainability criteria outweigh flood risk issues, the decision making process should be transparent with reasoned justifications for any decision to allocate land in areas at high flood risk in the sustainability appraisal report. The Sequential Test can also be demonstrated in a free-standing document, or as part of strategic housing land or employment land availability assessments.

2.12 The Council must consider whether there are sequentially preferable development sites within Lymm. This Statement highlights two development sites, which have not been considered by the Council for development, that could accommodate a number of houses and deliver wider community benefits e.g. highways improvements and improvements to the operation of the Ravenbank Community Primary School through a new car park and drop-off zone. Both of these sites are within Flood Zone 1 (i.e. low risk of flooding) and are sequentially preferable sites to Draft Policies OS6 and OS8.

2.13 Furthermore, the Sustainability Appraisal does not highlight Flood Zone 2 as being a major area of concern for Draft Policy OS8. It is not clear how this could be assessed as being 'amber' in respect of flood risk when half of the site falls within a Flood Zone 2.

3. Planning application 2017/3174 (Ravenbank House)

3.1 An outline planning application was lodged by ATM Landmark in November 2017 for the erection of up to 19 dwellings on land to the southern side of Sutch Lane (LPA ref: 2017/31074). This site is used for the storage of caravans and we provide a red edge plan below (our client's site is the triangular shaped piece of land to the opposite side of Sutch Lane):



3.2 The application site is located immediately to the south of our client's site referred to as 'Land off Pepper Street and Sutch Lane' through this Statement, and immediately to the west of our client's site referred to as 'Land south of Sutch Lane, Lymm' through this Statement.

3.3 The planning application was presented to Planning Committee in January 2018 with a recommendation of approval by officers. Relevant points are summarised below from the Committee Report:

- The site is relatively well enclosed by established boundaries and it does not appear prominent in the wider landscape.
- The lawful use of the site is for the storage of up to 200 touring caravans pursuant to certificate of lawfulness 2017/30114, and it also contains temporary structures and a dwelling house known as Ravenbank House.
- The substantial area of woodland planting to the south of the site forms a substantial buffer between the site and suburban housing on Scholars Green Lane and Churchwood View.
- The local highways authority raised no objections to the proposed access arrangements from the existing mini-roundabout at the end of Pepper Street.
- The existing highways situation at the end of Pepper Street is 'very poor' and the proposed new access arrangements would bring highways benefits in terms of cycle, equestrian and pedestrian safety.

- 3.4 Members resolved to refuse planning permission and a subsequent appeal was dismissed by the Planning Inspectorate on the basis that the scheme comprised inappropriate development within the Green Belt (PINS ref: APP/M0655/W/18/3206593). However, the application established that the existing access arrangements at the end of Pepper Street are 'very poor' and there is potential for improvements in terms of highways safety. It is also established that the site already has an urbanised character with the potential to accommodate up to 200 caravans.
- 3.5 The release of our client's sites from the Green Belt has the potential to deliver highways benefits through a new access arrangement at the end of Pepper Street (such benefits can be delivered through one or both site allocations). Furthermore, the urbanised character of land to the south of Sutch Lane emphasises how heavily influenced our client's sites are by urban features and its close functional and visual relationship to the urban area of Lymm.
- 3.6 We enclose a copy of the Committee Report and appeal decision at **EP3**.

4. Land off Pepper Street and Sutch Lane, Lymm

Site context and surroundings

- 4.1 We provide an image with this site edged red below (the land edged blue is land also within our client's control and this 2nd parcel of this is also the subject of this Statement):



- 4.2 See also the location plan at EP1. This site is approximately 1.7ha, and is capable of supporting approximately 50 units. It forms a logical urban extension to Lymm. It is well contained by the Bridgewater Canal to the north, residential development to the west and Ravensbrook School and a caravan storage site to the south. It is heavily influenced by surrounding urban features.
- 4.3 The site is not constrained by flood risk.
- 4.4 The site is highly sustainable, and is well related to local infrastructure and amenities, including highway networks, schools and convenience stores.

Proposed allocation

- 4.5 We would suggest that a site-specific allocation of our client's site through the emerging Warrington Local Plan could be worded such that it requires the following:
- The provision of around 50 homes comprising an appropriate mix of sizes and tenures.
 - The delivery of an element of affordable housing in accordance with planning policy requirements.
 - The provision of a new dedicated school drop-off and parking zone for Ravenbank Community Primary School.

- Provision of on-site open space.
- Appropriate access for vehicular traffic and pedestrians and the submission of a Transport Assessment.
- Provision of a comprehensive landscaping plan for the retention and enhancement of the existing hedgerow to the site boundaries and existing ecological features.
- Contributions to local infrastructure such as school and health provision where appropriate and in accordance with planning policy requirements.

4.6 A standalone site allocation could provide a new car park and drop-off area for the school with wider benefits for the operation of the school premises. A wider site allocation incorporating land to the South of Sutch Lane (discussed further below) could include the provision of a new link road between Pepper Street and Oughtrington Lane, which would provide a direct route for residents into Lymm from the east and has the potential to relieve traffic congestion.

Green Belt considerations

- 4.7 We consider that the site serves no meaningful Green Belt function, and on this basis the site should be removed from the Green Belt. Furthermore, paragraph 138 of the Framework states that when *“reviewing Green Belt boundaries, local authorities should take account of the need to promote sustainable patterns of development”*. It is our view that this site should be allocated in the Local Plan Review due to its sustainable attributes.
- 4.8 The Green Belt review undertaken by ARUP on behalf of the Council assesses our client's site as part of parcel of land ref: 'LY17' and is noted as making a strong contribution to the Green Belt, primarily on the basis of the site being well connected on three sides by the countryside. However, the assessment makes no reference to the extensive commercial caravan storage to the southern boundary of the site and this adds to a sense of containment. Furthermore, the assessment concludes that the site is enclosed on three sides by the countryside, which is clearly not the case. The ARUP assessment of this parcel appears to be flawed.
- 4.9 We cannot agree that the southern boundary enjoys a strong affinity to the countryside and consider that the final assessment of the site making a 'strong' contribution to the Green Belt is not based on a thorough assessment of the site's characteristics.
- 4.10 The site is heavily influenced by surrounding urban features and its release for housing would comprise a small-scale and logical urban extension. Its boundaries are readily defensible by

virtue of existing physical barriers e.g. Bridgewater Canal to the north, caravan storage and a school to the south and the built-up area of Lymm to the west. The site is enclosed and heavily influenced by urban features, the physical barrier present would prevent any sense of urban encroachment and the site would be very well contained. Furthermore, the site does not play any role in the preventing of settlements or preserving historic settlements.

4.11 It is therefore considered that the site makes a 'weak' contribution to the openness and main purposes of including land within the Green Belt.

4.12 Furthermore, Submission Version Local Plan identifies land to the north of Bridgewater Canal to be removed from the Green Belt pursuant to Draft Policy OS7. This draft site allocation is for 200 new homes and a medical centre with associated works. Notwithstanding the point that land to the north of the canal at Tanyard Farm is already urbanised as a result of the significant commercial complex, our client's site would effectively comprise a small infill site enclosed by physical barriers and the revised settlement boundaries for Lymm as a result of Draft Policy OS7. This would further emphasise the suitability of the release of our client's site from the designated Green Belt in order to meet identified development needs:



Highways

- 4.13 As discussed earlier, the Council's Committee Report for planning application 2017/3174 (Ravenbank House) noted that the existing access arrangement at Pepper Street and Ravenbank Community School are 'very poor' (**EP3**). There is potential for improvements in terms of highways safety as acknowledged by the Council through this Committee report.
- 4.14 As discussed below, the detailed access arrangements designed by SCP could deliver a safe and suitable new access for users of the highway including parents and children using Ravenbank Community Primary School. Furthermore, the drawings prepared by SCP also show a new dedicated parking/drop-off for parents of the school and this would comprise a significant benefit in terms of the operation of the school and highways safety.
- 4.15 A Site Access Appraisal has been prepared by SCP for this site and is enclosed at **EP4**. The main points raised by SCP are summarised as follows:
- Pepper Street benefits from a carriageway 6m in width and wide footways and regularly spaced lighting columns.
 - In the vicinity of the site, access is provided to Ravenbank Community Primary School, Sutch Lane and a caravan park off a mini-roundabout. The mini-roundabout is also used as a turning circle for parents picking up and dropping off their children during school hours.
 - Sutch Lane borders the southern boundary of the allocation site and is a public right of way that provides a link from Oughtrington Lane to Lymm via Pepper Street.
 - Access to the site would be provided through an extension to Pepper Street and has been designed with a 5.5m wide carriageway and a 2m wide footway on the southern side of the road, as shown on detailed technical drawings appended by SCP. The client understands that the site access can be delivered using land under their control.
 - The drawings prepared by SCP also show that it is proposed that a car park and drop off area will be provided for the school within this allocation site which will help to reduce parking / drop off activities and therefore improve conditions on this section of Pepper Street.
 - The site is suitable for housing in highways terms and there is the potential for wider benefits through the addition to a new car park and drop-off area for the school.
 - Land to the South of Sutch Lane (discussed within these representations further below – **EP2**) is also being promoted by our clients for development. Both sites could come forward together a single allocation as there a link road could be provided between Pepper Street and Oughtrington Lane by the client, which will provide an alternative route for residents travelling to and from the east, helping to relieve pressure on the

western parts of Pepper Street and its junction with the A6144. Detailed junction drawings have been prepared by SCP to show that such a new link road is feasible.

Local infrastructure

- 4.16 The site is located to the edge of the existing built-up area of Lymm with no fundamental constraints in terms of utilities and surface and foul water connections. It is in close proximity to existing key services such as schools and health facilities. With due regard for the scale of the development proposed, the allocation of our client's site would not place undue pressure on local infrastructure and services.
- 4.17 Any planning application could secure the provision of developer contributions to local services such as education and health facilities where appropriate and in accordance with planning policy requirements and the tests set out through the Community Infrastructure Levy Regulations 2010.

Summary and conclusions

- 4.18 We summarise our points with regard to this site as follows:
- The site is located to the edge of the built-up area of Lymm and is influenced by surrounding urban features e.g. Bridgewater Canal to the north, the built-up area to the west and Sutch Lane to the south with a caravan site beyond. The boundaries are readily defensible by physical barriers such that urban encroachment would not be an issue for this site.
 - The site is unremarkable in landscape terms, and is not subject to any heritage, arboriculture or ecology constraints.
 - The site does not make a strong contribution to the Green Belt.
 - SCP have demonstrated that the release of our client's site on a standalone basis would not undermine highways safety or the local road network. Detailed highways drawings have been submitted.
 - The work undertaken by SCP shows the potential for a new car park/drop-off zone within our client's land for Ravenbank Community Primary School, and this would comprise a significant community benefit in favour of the allocation in terms of highways safety and the operation of the school.
 - There is potential for a new road link to Oughtrington Lane as part of a wider site allocation with Land to the South of Sutch Lane, which is also being promoted by our client for housing.

- All of the recommended measures to facilitate appropriate access relate to land within our client's control, and the site is locationally sustainable in terms of local services and public transport provision.
- The release of this site would contribute to meeting the identified development needs of Lymm in a sustainable manner.
- The local plan evidence base is fundamentally flawed in that there is no transparent or robust site-selection process for potential new sites, and our client's site has not been considered by the Council for development purposes through the emerging local plan.

5. Land south of Sutch Lane, Lymm

Site context and surroundings

- 5.1 This site is approximately 9ha in area and is capable of supporting up to 270 dwellings. The site is bounded to the north by the Bridgewater Canal, to the east by Oughtrington Lane, to the south by open fields and to the west by residential and commercial development. We are proposing this site for consideration on the same basis as Land off Pepper Street and Sutch Lane (see **EP1**), as it shares many of the same characteristics and is adjacent.
- 5.2 A site location plan is appended at **EP2**, and we provide an image with this site edged red below (the land edged blue is land also within our client's control and this 2nd parcel of this is also the subject of this Statement):



Proposed allocation

- 5.3 We would suggest that a site-specific allocation of our client's site through the emerging Warrington Local Plan could be worded such that it requires the following:
- The provision of around 270 homes comprising an appropriate mix of sizes and tenures.
 - The delivery of an element of affordable housing in accordance with planning policy requirements.
 - Provision of on-site open space.
 - Appropriate access for vehicular traffic and pedestrians and the submission of a Transport Assessment.

- Provision of a comprehensive landscaping plan for the retention and enhancement of the existing hedgerow to the site boundaries and existing ecological features.
- Contributions to local infrastructure such as school and health provision where appropriate and in accordance with planning policy requirements.

5.4 A wider site allocation incorporating Land off Pepper Street and Sutch Lane (discussed further above) could include the provision of a new link road between Pepper Street and Oughtrington Lane, which would provide a direct route for residents into Lymm from the east and has the potential to relieve traffic congestion.

Green Belt considerations

5.5 It is our view that the site serves no meaningful Green Belt function, and on this basis the site should be removed from the Green Belt. Furthermore, paragraph 138 of the Framework states that when *"reviewing Green Belt boundaries, local authorities should take account of the need to promote sustainable patterns of development"*. We consider that this site should be allocated in the Local Plan Review due to its sustainable attributes.

5.6 The ARUP Green Belt Assessment assesses our client's site within a wider parcel of land referenced as LY19. It notes that the site makes no contribution to preventing the merging of settlements or preserving the historic character of settlements. We agree with these conclusions.

5.7 However, ARUP also conclude that the site makes a 'strong' contribution to the openness and main purposes of the Green Belt. We do not agree with this assessment. The site is heavily influenced by urban features and benefits from being enclosed and enclosed by physical barriers. There is a caravan storage site and the built-up beyond including the Ravenbank Community Primary School to the western boundary, Sutch Lane to the northern boundary, Oughtrington Lane and built development (e.g. St Peters Church and Lymm High School beyond) to the eastern boundary and a delineated and recognizable field boundary to the southern boundary. These influences limit the extent to which it can argued that the release of this site would result in urban encroachment and undermine the character of the countryside, and it cannot in our view be concluded that the site makes a 'strong' contribution accordingly.

5.8 We would also highlight again the points made at paragraph 4.12 of this Statement in terms of the revised settlement boundaries for Lymm as a result of Draft Policy OS7.

Highways

5.9 A Site Access Appraisal has been prepared by SCP for this site and is enclosed at **EP5**. The main points raised by SCP are summarised as follows:

- The proposed allocation site has a significant length of frontage onto Oughtrington Lane which provides numerous options in relation to the location and form of the site access. However, a potential priority controlled ghost island right turn lane junction option has been developed and is shown on a detailed access drawing submitted.
- The proposed access arrangements would provide adequate visibility splays in both directions.
- Land off Pepper Street and Sutch Lane (discussed within these representations further above – **EP1**) is also being promoted by our clients for development. Both sites could come forward together a single allocation as there a link road could be provided between Pepper Street and Oughtrington Lane by the client, which will provide an alternative route for residents travelling to and from the east, helping to relieve pressure on the western parts of Pepper Street and its junction with the A6144. Detailed junction drawings have been prepared by SCP to show that such a new link road is feasible.
- The site is suitable for residential development in highway terms.

5.10 It is considered that the provision of a new link road would provide significant local benefits, and this alongside meeting housing needs is capable of being an exceptional circumstance to justify the release of the site from the Green Belt. A new link road would introduce significant benefits that would otherwise not be achieved, and could only be delivered through a wider site allocation of our client's site interests.

Local infrastructure

5.11 The site is located to the edge of the existing built-up area of Lymm with no fundamental constraints in terms of utilities and surface and foul water connections. It is in close proximity to existing key services such as schools and health facilities. With due regard for the scale of the development proposed, the allocation of our client's site would not place undue pressure on local infrastructure and services.

5.12 Any planning application could secure the provision of developer contributions to local services such as education and health facilities where appropriate and in accordance with planning policy requirements and the tests set out through the Community Infrastructure Levy Regulations 2010.

Summary and conclusions

5.13 We summarise our points with regard to this site as follows:

- The site is located to the edge of the built-up area of Lymm and is influenced by its proximity at the western and eastern edges to existing built development.
- The site is unremarkable in landscape terms and comprises a single field with no hedgerows or trees within the site itself.
- The development of the site could comprise a logical urban extension to Lymm in Green Belt terms, and would deliver a large proportion of the identified housing needs for Lymm in a sustainable manner.
- The site is suitable for residential development in highways terms.
- There is potential for a new road link to Oughtrington Lane as part of a wider site allocation with Land off Pepper Street and Sutch Lane, which is also being promoted by our client for housing. This would represent a significant benefit of the development that could only be achieved through the wider allocation of our client's site interests.
- The local plan evidence base is fundamentally flawed in that there is no transparent or robust site-selection process for potential new sites, and our client's site has not been considered by the Council for development purposes through the emerging local plan.

6. Summary and conclusions

6.1 There is an acknowledged need to release Green Belt in the borough. However, we consider that the Council has underestimated the amount of housing that needs to be delivered on Green Belt sites. The Council will need to ensure that the plan is flexible. In practice this means identifying a supply of housing significantly in excess of the minimum requirement, in order to provide sufficient contingency for the plan to deal with rapid change. Please refer to our separately submitted submissions on behalf of a number of clients to the strategic policies of the Submission Version Local Plan.

6.2 We summarise the points made through this Statement below:

- The evidence base underpinning the local plan is fundamentally flawed in the absence of any understanding as to the site selection process.
- Two draft site allocations within Flood Zone 2/3 are highlighted in Lymm whereby a sequential assessment has not been carried out, and this highlights that the general approach to selecting sites is not sound.
- Our client is promoting two deliverable sites, within a Flood Zone 1, which are suitable as an allocation and have not been considered through the evidence base for the local plan.
- We highlight the Committee report at Ravenbank House, which acknowledged the need for an improvement junction arrangement at the end of Pepper Street.
- Our client has obtained detailed access plans from SCP showing safe and appropriate access provision for the two sites being promoted for development.
- The proposed site allocation at Pepper Street and Sutch Lane could deliver significant benefits in terms of highways safety and the operation of the primary school e.g. a new car park and drop-off zone for the school could be provided within the site allocation.
- The proposed site allocation south of Sutch Lane could provide a new link road providing relief to the A6144 and improving the local road network.
- The revised settlement boundaries for Lymm pursuant to Draft Policy OS7, and the implementation of planning permission for 64 new homes at Tanyard Farm by Bellway Homes, further emphasise the suitability of the release of our client's sites for identified development needs.

6.3 The two sites put forward through this Statement are deliverable subject to a policy change, and it is considered that their allocation for development would represent sustainable development in accordance with the Framework.

7. Appendices

EP1 – Land off Pepper Street and Sutch Lane, Lymm.

EP2 - Land south of Sutch Lane, Lymm (to include the provision of a new link road between Oughtrington Lane and Pepper Street).

EP3 – Committee Report: Ravenbank House, Lymm.

EP4 – Site Access Appraisal prepared by SCP (Land off Pepper Street and Sutch Lane, Lymm).

EP5 – Site Access Appraisal prepared by SCP (Land to the South of Sutch Lane, Lymm).

EP1

ER STREET

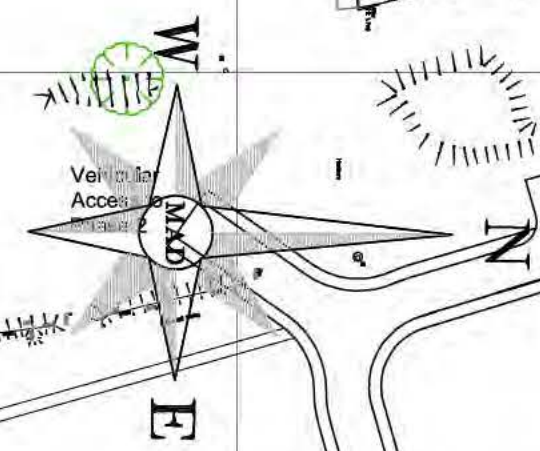
Site C 1.70ha

SUTCH LANE

BRIDGEWATER CANAL

PURPOSE OF ISSUE	DISCUSSION
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All dimensions shall be verified by the Contractor(s) on site prior to work commencing and relevant codes being issued. Do not scale from this drawing and only work to written dimensions. Any discrepancies to be brought to the attention of the Contract Administrator for instructions prior to proceeding.



Maybin Architectural Design

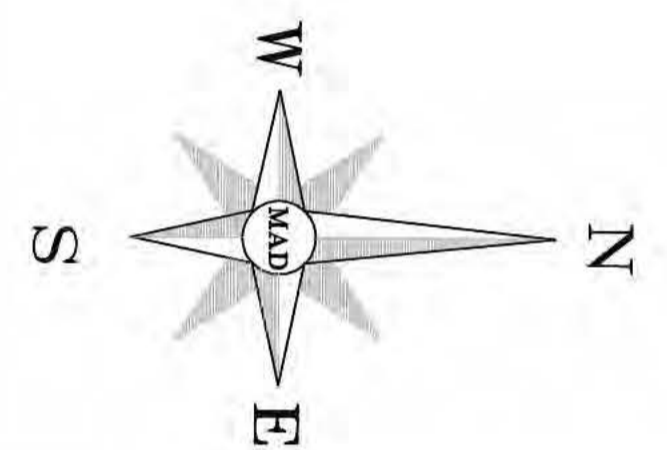
PROJECT:
DEVELOPMENT SITES
LYMM
DRAWING:
SITE C

Hatherlow House
Hatherlow
Romiley
Stockport
SK6 3DY

DATE: Nov 16	DRAWN BY: ARC	CHECKED BY: CPM
SCALE: 1:1250	DRAWING NO: 1056-OP-SK22	REV:

Tel: 0161 494 2800
Fax: 0161 406 7444
email: cpmaybln@btinternet.com

EP2



PURPOSE OF ISSUE	DISCUSSION
<small>All dimensions shall be verified by the Contractor on site prior to work commencing and relevant notes being placed. Do not scale from the drawing and only work to written dimensions. Any discrepancies to be brought to the attention of the Contract Administrator for resolution prior to proceeding.</small>	

Maybin Architectural Design

PROJECTS
DEVELOPMENT SITES
LYMM
DRAWING
SITE D

Hatherlow House
Hatherlow
Romley
Stockport
SK6 3DY

DATE	DRAWN BY:	CHECKED BY:
Nov 16	ARC	CPM
SCALE:	DRAWING NO:	REV:
1:1250	1056-OP-SK23	

Tel: 0161 494 2800
Fax: 0161 406 7444
email:cpmaybin@btinternet.com

EP3

DEVELOPMENT CONTROL COMMITTEE DATE 31-Jan-2018

ITEM 1

Application Number:	2017/31074
Location:	Ravenbank House, Pepper Street, Lymm, Warrington, WA13 0JT
Ward:	Lymm South
Development	Outline Planning Application (Major) (Access Only) - Outline application for proposed residential development and access including demolition of existing dwelling, associated garages and ancillary buildings (all other detailed matters are reserved).
Date Registered:	30-Aug-2017
Applicant:	ATM LANDMARK
8/13/16 Week Expiry Date:	28-Nov-2017

Reason for Referral

Lymm Parish Council object.

Human Rights

The relevant provisions of the Human Rights Act 1998 and the European Convention on Human Rights have been taken into account in the preparation of this report, particularly the implications arising from the following rights:-

Article 8 - The right to respect for private and family life, home and correspondence.

Article 1 of Protocol 1 - The right of peaceful enjoyment of possessions and protection of property.

Proposal

An outline application with all detailed matters, other than access, reserved for later approval.

The demolition of an existing dwelling on site is also proposed.

An illustration of one, possible way the site might be developed with a mix of up to a maximum of 19 houses and bungalows has been submitted.

The scheme would utilise the existing vehicular access to the site, with

improved arrangements at the Pepper Street frontage.

Detailed matters of layout, scale, landscaping and appearance are reserved for later approval.

Site

The 0.8 ha T-shaped site has access off Pepper Street, adjacent to Ravenbank Community Primary School and The Rosebank Centre approx. 400 m from Lymm village centre.

The western part of the application site is located within the Lymm (Inset) settlement whilst the eastern part of the site is located in the Green Belt.

The whole of the site is relatively well enclosed by established boundaries, including a substantial area of trees to the immediate south. It also sits at a lower level than the land to the east and south so that the land does not appear prominent in the wider landscape when seen from Oughtrington Lane to the east or Longbutt Lane to the south.

The Application Site and Surrounding Area



Sutch Lane is a bridleway and footpath which runs for approx. 190 metres along the northern edge of the site is set lower than the site itself. The landscape falls away further towards the canal and Cloverfield and Fletchers Lane, off Rushgreen Road, beyond. The tops of some of the caravans are visible over the timber fence which forms the northern boundary of the site with the bridleway/ footpath. There is quite strong tree and hedgerow screening along both sides of the bridleway/ footpath which significantly reduces the visibility of caravans.

Views into to the site from Pepper Street are limited by the site's topography and vegetation cover.

The lawful use of the site is for the storage of up to 200 touring caravans. The part of the site in the Green Belt also includes a detached dwelling (Ravenbank House) and a small single storey outbuilding. A track leading into the site past the dwelling splits into three to provide access to the areas of caravan storage.

The site is a mix of hardstand and greenfield land, with several built and temporary structures, including the dwelling Ravenbank House itself.

Whilst replacing the existing dwelling “like-for-like” would be policy compliant, the main body of the site cannot be regarded as previously developed land. As such, save for the dwelling and outbuilding, the storage of caravans on the Green Belt part of the site would not meet the exception related to previously developed land (identified in paragraph 89 of the NPPF).

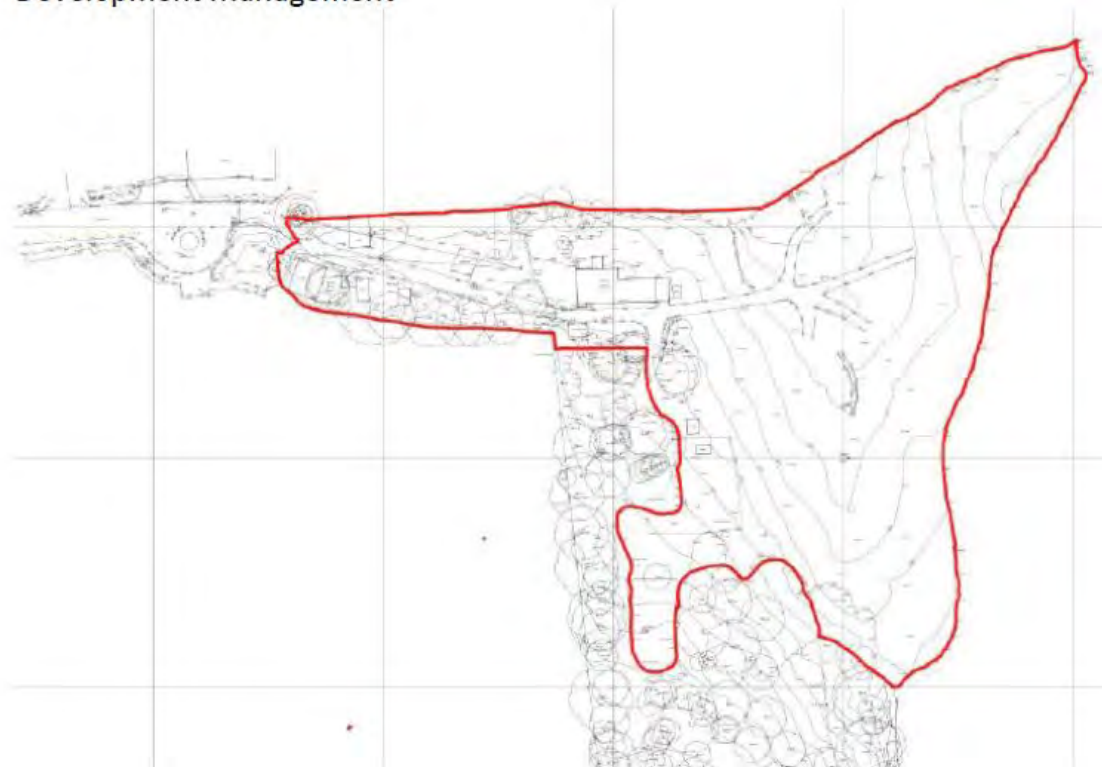
The site is not within a conservation area, does not contain any listed buildings and is not subject to any statutory nature conservation designations.

Relevant Planning History

Lawful Development Certificate (2017/30114) issued for the storage of up to 200 touring caravans.

The area over which lawfulness has been confirmed for caravan storage exceeds that of the current application site as shown below:-

Area of Lawful Use for Caravans



Planning Application Site Boundary



Planning Policies

National Planning Policy Framework

Matters including the effort to support sustainable new development; protection of Green Belt; the delivery of new housing and affordable housing; the creation of high quality places and the protection of living conditions.

Local Plan Core Strategy (LPCS)

The main policy framework in the LPCS, is provided by:-

- CS1 – Delivering Sustainable Development
- CS2 – Quantity and Distribution of Development
- CS3 - Maintaining a 10 year Forward Supply of Housing Land
- CS5 – Green Belt
- SN1 – Distribution and Nature of New Housing
- SN2 – Securing Mixed and Inclusive Neighbourhoods
- QE6 – Environment and Amenity Protection
- QE7 – Ensuring a High Quality Place
- QE8 – Historic Environment
- MP1 – General Transport Principles
- CC1 – Inset and Green Belt Settlements
- CC2 – Protecting the Countryside

Supplementary Planning Documents

- Design and Construction
- Environmental Protection
- Standards for Parking in New Development
- Planning Obligations

Consultation Responses

WBC Highways – No objections to amended access details, subject to conditions.

WBC Environmental Protection – No objections subject to conditions.

WBC Flood Risk – No objection subject to conditions.

WBC Education – No objection subject to the payment of a financial contribution (dependent on the number of dwellings to be delivered), to be utilised at Lymm High School. .

Greater Manchester Ecology Unit (GMEU) – No objection.

United Utilities – No objection subject to conditions.

Notification Responses

Ward Councillors – No response to date.

Lymm Parish Council – Object:

- The area is in green belt
- The access is at the top of a busy already very congested road and the entrance is close to a primary school and would cause an additional hazard

Neighbours – Seven objections:

- Would worsen traffic problems on Pepper Street, especially at school times
- Unacceptable in Green Belt
- No traffic mitigation plans or access improvement
- Pepper Street footpath often blocked with parked cars
- Little public transport or facilities/ amenities in village
- Loss of amenity at Rosebank Naturegarten if the road abuts the perimeter fence due to increased noise and intrusion of passing vehicles; loss of greenery; a new public road would have implications for security and child protection at Rosebank Naturegarten
- Would affect the Public Right of Way
- It is critical that access to our client's land (immediately to the north of the site on the other side of Sutch Lane) is not unduly prejudiced by the proposal, so as not to undermine its deliverability as a possible housing site

Observations

Until the Council can demonstrate a 5 year housing supply paragraph 49 of the NPPF confirms that relevant policies for the supply of housing should not be considered up-to-date. This means that the presumption in favour of sustainable development as set out in paragraph 14 of the NPPF will apply, ie, planning permission should be granted unless *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole* or *specific policies in this Framework indicate development should be restricted*".

Impact on Green Belt

The western part of the application site is located within the Lymm (Inset) settlement whilst the larger, eastern part is in Green Belt.

The re-development of that part of the site which is within the Village Inset boundary would be acceptable in principle.

The development proposed on the Green Belt part of the site would cause harm to Green Belt by way of inappropriateness, a reduction in openness and by way of encroachment of built form from the previously developed "brownfield" parts of the site into those areas where there are currently no permanent buildings or fixed infrastructure.

The development would be in an area currently used for the storage of caravans, but would extend the built edge of Lymm approximately 190 metres to the east.

Substantial weight should be attached to harm from inappropriateness. Planning permission should not be granted unless such harm – and any other harm – is clearly outweighed by the potential benefits, including any very special circumstances, of the proposal.

Openness of the Green Belt

Although not submitted at this outline stage, the bulk, massing and/ or height of the proposed dwellings is likely to significantly exceed that of the existing structures and caravans on site, and therefore would significantly reduce the openness of tGreen Belt in this vicinity.

Whilst the caravans on site have an impact on the openness of the Green Belt, such impact is transient – in that they are moveable structures – and that the number of caravans on site will vary throughout the year.

Larger, permanent dwellings on the site would be more highly visible in the landscape, especially from the north where the land tends to fall away down to the canal.

Overall, due in part to strong screening, the caravans on site are not prominent in the wider landscape, being barely visible at all from vantage points such as the churchyard at the rear of St Peter's Church on approx. 395 metres to the east of the site.

Beyond the site itself, the large expanse of open farmland to the east – between Sutch Lane and Longbutt Lane - makes an undisputedly strong contribution to openness and to Green Belt objectives.

The substantial area of existing woodland planting to the immediate south of the site forms a substantial buffer between the site and the suburban housing on Scholars Green Lane and Churchwood View. The site would project circa 180 metres further east than the established edge of existing housing on Cyril Bell Close on the far side of Pepper Street/ Sutch Lane to the immediate north.

The proposal would involve the removal of low level workshops and the open storage of machinery and their replacement with new dwellings and their

gardens.

Notwithstanding the low key visual presence of the caravans in the wider landscape, openness would be affected by their replacement with housing, and there would therefore be significant harm by way of the reduction in openness.

Such harm would add to the substantial harm to the Green Belt by way of inappropriateness.

OTHER POTENTIAL HARM

Highways Matters and Public Right of Way

The Council's Highways team are comfortable that revisions to the proposed access arrangements from the existing mini-roundabout at the end of Pepper Street in front of Ravenbank School is acceptable. The existing situation is acknowledged to be very poor, so the proposed scheme would bring benefits at the existing roundabout and Public Right of Way in terms of cycle, equestrian and pedestrian safety.

Ecology

No evidence of bats emerging from the existing dwelling was recorded, following three surveys.

Whilst the building to be demolished has been assessed as low risk for bats, under the Habitat Regulation it is an offence to disturb, harm or kill bats. If a bat is found during demolition all work should cease immediately and a suitably licensed bat worker employed to assess how best to safeguard the bat(s). Natural England should also be informed.

Low levels of bat activity was recorded to the west of the building. The trees that are most likely providing the focus of interest are primarily to be retained. There is however a risk of external lighting disrupting bat activity, however the level of impact is negligible relative to the available habitat so no further measures are required to mitigate impact.

The applicant anticipates that, as part of reserved matters submissions, the ecological value of the site could be enhanced through the retention and introduction of a diverse vegetation structure

Trees

Although landscaping is a reserved matter, proposals for a landscape strategy which would protect and strengthen planting at the site, including a long term defensible interface with the Green Belt along the important eastern edge of the site is recognised, and will be pursued at reserved matters stage..

Heritage Matters

The application suggests that the siting of bungalows along the eastern boundary of the site would allow clearer, uninterrupted views of St Peter's Church (circa 400 metres to the east on Oughtrington Lane) from the direction of the application site. It is accepted that improving the views of a heritage asset from a public vantage point is generally to be encouraged, and would be a benefit of the proposal, to which some weight should be attached. This would help improve appreciation of the Church and its churchyard, although it

is acknowledged that the improved views would be from the application site itself, rather than from a major public thoroughfare or main street.

View across the site with St Peter's Church in the distance



Residential Amenity

It is acknowledged that there would tend to be more traffic associated with the proposed residential use than with the existing use for caravan storage. However, even if developed with a notional total of 19 residential units (ie the maximum which has been illustrated), it is considered that serious harm to living conditions at dwellings on Pepper Street and its side streets would not occur, by way of additional traffic movements. There are not considered to be any other significant sources of potential harm to residential amenity.

It is necessary to now consider whether the sources of potential harm set out above are outweighed by other considerations.

OTHER CONSIDERATIONS

The development would deliver 50 per cent of total site capacity as dwellings for social/ affordable rent. Considerable positive weight is attached to this. Such delivery would comfortably exceed the usual policy requirement of 30 per cent site capacity – to be divided between Starter Homes and social/ affordable rent. This is considered to be a considerable benefit of the proposal – as the need for social/ affordable rent in Lymm is known to be acute, and that such provision would tend to better meet the known need for affordable homes than would Starter Homes.

The applicant has submitted support for the principle of 2 and 3 bedroom houses on the site, in preference to apartments, from Torus – a Registered Provider. Torus also comment that there is evidenced demand for social rented housing in this semi-rural high value area.

The development would deliver the necessary financial contribution to mitigate the impact of the development on the need for high school places, and so would be policy compliant in this regard. The monetary total would depend on the eventual number of family dwellings which received reserved matters approval. Such policy compliance is neutral in terms of weighing the material considerations.

The changes to the front of the site which entails work to the public highway would be undertaken under the Highway Acts, at the developer's expense. The existing situation is very poor, so some benefit to the roundabout and Public Right of Way would accrue, in terms of cycle, equestrian and pedestrian safety should the proposed development be approved. Some limited weight is therefore attached to this.

The proposal is an opportunity to replace the caravan storage use across an area of land which extends beyond the application site boundaries. This is because the Certificate of Lawfulness for caravan storage, issued in June 2017, covered the application site itself and an area of land beyond this – to the south – close to the substantial copse of trees. The replacement of stored caravans with new, well designed dwellings and landscaping, would tend to visually enhance the site and some weight should be attached to this potential benefit. Overall, the removal of the caravan storage use, both within and beyond the application site boundary, is considered to attract significant positive weight.

The proposals give the opportunity to deliver new, substantial landscape planting which would provide a stronger, long term interface with the wider Green Belt. Such definition already exists – but some limited weight should be attached to the scope to improve this.

There is the potential to enhance views through the development of St Peters Church – approx 400 metres to the east. The weight which should be attached to this facet is limited – as such enhancement would be sought as a routine matter of layout design, in any event. In addition, the improved views would be from the application site itself, rather than from a major public thoroughfare or main street.

There is some potential to enhance biodiversity, especially if the wooded area to the south of the site in the applicant's control is better managed. Some limited weight can be attached to this potential.

The economic benefits to the village, in terms of an addition to the choice of quality family homes and to local spending power are accepted as carrying some limited weight.

Balancing Exercise

There would be substantial harm to Green Belt by way of inappropriateness; loss of openness and by way of encroachment of built form from the previously developed "brownfield" parts of the site into those areas where there are no permanent buildings or fixed infrastructure. In all other regards, the proposals would be policy compliant and would be considered to be development in a sustainable village location.

It is accepted however that the site does not currently make a strong contribution to green belt objectives, given its lawful use for the storage of up to 200 caravans. It is acknowledged also that the application site is significantly smaller than the area over which caravans might lawfully be stored.

The delivery of 50 per cent of site capacity for affordable/ social rent comfortably exceeds the usual policy requirement of 30 per cent, and would

meet a known need for this form of housing would be substantial – which is also considered preferable to Starter Homes in this regard. Such delivery has support from a recognised Registered Provider of affordable housing.

It is considered that the potential benefits of the proposed development clearly outweigh the likely substantial harm to Green Belt in this case.

Conclusion

On balance, it is considered that other considerations clearly outweigh harm to Green Belt and that compelling very special circumstances exist which justify approval of the proposed development.

This is an opportunity to deliver new dwellings for affordable/ social rent (which would exceed the usual policy requirement), albeit on a modestly-sized site – together with the elimination of caravan storage use – which currently extends beyond the application site boundary.

The residential proposal would bring the land back into a more beneficial and more efficient use, with additional benefits including enhancement of the views of the listed Church; measures to improve the access arrangements in the vicinity of the site frontage near Ravenbank School and scope for additional planting to form a long term interface with the wider, open Green Belt beyond.

Cumulatively, it is considered that these factors combine to clearly outweigh the substantial harm to an area of land which does not currently contribute strongly to the openness of Green Belt, and to contribute to the current shortfall in the supply of available housing land.

Recommendation

Approve subject to conditions; section 106 agreement and referral to the National Planning Casework Unit.

Conditions

1. The development hereby approved shall be commenced before the expiration of three years from the date of this permission or two years from the approval of the last of the reserved matters as defined by condition 3 below, whichever is the later.

Reason: To ensure that the Local Planning Authority retains the right to review unimplemented permissions and to comply with Section 92 (as amended) of the Town & Country Planning Act 1990.

2. The development hereby permitted shall not be carried out otherwise than in strict accordance with the submitted details and any subsequently approved reserved matters.
Reason: For the avoidance of doubt and to define the permission.

3. a) Details of the reserved matters set out below (“the reserved matters”) shall be submitted to the Local Planning Authority for

approval within three years from the day of this permission:

- (i) layout;
- (ii) scale;
- (iii) appearance, and
- (iv) landscaping.

b) The reserved matters shall be carried out as approved.

c) Approval of all reserved matters shall be obtained from the Local Planning Authority in writing before any development is commenced.

Reason: To enable the Local Planning Authority to control the development in detail and to comply with Section 92 (as amended) of the Town & Country Planning Act 1990.

4. This outline permission shall not be implemented otherwise than in accordance with the following plans/ drawings (including, where necessary, agreement with the local Highway Authority under S278):-

Curtins Drawing Access Arrangement 06006 Rev P07;
Site Location Plan 1587 PL 001 Rev C;
Existing Plan 1587 PL 003 Rev A;
Topographical Land Survey S17-208.

5. Foul and surface water shall be drained on separate systems.

Reason - To secure proper drainage and to manage the risk of flooding and pollution in accordance with policy QE6 of the Local Plan Core Strategy for Warrington and with the adopted Design and Construction SPD.

6. Prior to the commencement of any development hereby permitted, a surface water drainage scheme, based on the hierarchy of drainage options in the National Planning Practice Guidance with evidence of an assessment of the site conditions shall be submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme must be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards. In the event of surface water draining to the public surface water sewer, the pass forward flow rate to the public sewer must be restricted to a rate agreed with United Utilities.

Reason: To promote sustainable development, secure proper drainage, to manage the risk of flooding and pollution and in accordance with Policy QE4 of the adopted Local Plan Core Strategy.

7. No development (other than demolition and site clearance works) shall take place until the steps in Sections A and B below are undertaken:

A: CHARACTERISATION: With specific consideration to human health, controlled waters and wider environmental factors, the following documents must be provided (as necessary) to characterise the site in

terms of potential risk to sensitive receptors:

- Preliminary Risk Assessment (PRA or Desk Study)
- Generic Quantitative Risk Assessment (GQRA) informed by a Intrusive Site Investigation
- Detailed Quantitative Risk Assessment (DQRA)
- Remedial Options Appraisal

Completing a PRA is the minimum requirement. DQRA should only to be submitted if GQRA findings require it.

B: SUBMISSION OF A REMEDIATION & VERIFICATION STRATEGY:

As determined by the findings of Section A above, a remediation strategy (if required) and verification (validation) strategy shall submitted in writing to and agreed with the LPA. This strategy shall ensure the site is suitable for the intended use and mitigate risks to identified receptors. This strategy should be derived from a Remedial Options Appraisal and must detail the proposed remediation measures/objectives and how proposed remedial measures will be verified.

The actions required in Sections A and B shall adhere to the following guidance: CLR11 (Environment Agency/DEFRA, 2004); BS10175 (British Standards Institution, 2011); C665 (CIRIA, 2007).

Reason: To mitigate risks posed by land contamination to human health, controlled water and wider environmental receptors on the site (and in the vicinity) during development works and after completion in accordance with: Policy QE6 of the Adopted Local Plan Core Strategy; Paragraph 121 of the National Planning Policy Framework (March 2012), and Section 4 of the Environmental Protection Supplementary Planning Document (May 2013).

8. The development shall not be taken into use until the following requirements have been met and required information submitted to and approved by the Local Planning Authority (LPA):

A: REMEDIATION & VERIFICATION: Remediation (if required) and verification shall be carried out in accordance with an approved strategy. Following completion of all remediation and verification measures, a Verification Report must be submitted to the LPA for approval.

B: REPORTING OF UNEXPECTED CONTAMINATION: All unexpected or previously-unidentified contamination encountered during development works must be reported immediately to the LPA and works halted within the affected area(s). Prior to site works recommencing in the affected area(s), the contamination must be characterised by intrusive investigation, risk assessed (with remediation/verification measures proposed as necessary) and a revised remediation and verification strategy submitted in writing and agreed by the LPA.

C: LONG-TERM MONITORING & MAINTENANCE: If required in the agreed remediation or verification strategy, all monitoring and/or

maintenance of remedial measures shall be carried out in accordance with the approved details.

The site shall not be taken into use until remediation and verification are completed. The actions required to be carried out in Sections A to C above shall adhere to the following guidance: CLR11 (Environment Agency/DEFRA, 2004); BS10175 (British Standards Institution, 2011); C665 (CIRIA, 2007).

Reason: To mitigate risks posed by land contamination to human health, controlled water and wider environmental receptors on the site (and in the vicinity) during development works and after completion in accordance with: Policy QE6 of the Adopted Local Plan Core Strategy; Paragraph 121 of the National Planning Policy Framework (March 2012), and Section 4 of the Environmental Protection Supplementary Planning Document (May 2013).

9. Prior to the commencement of any works on site, the applicant shall provide in writing a Construction Environmental Management Plan (CEMP) to the LPA for written approval. The CEMP shall review all construction operations proposed on site and shall cover as a minimum the following areas of work on a phase by phase basis, identifying appropriate mitigation measures as necessary: Proposed locations of Site Compound Areas, Proposed Routing of deliveries to Site Compounds or deliveries direct to site, Proposed delivery hours to site, Proposed Construction Hours, Acoustic mitigation measures, Control of Dust and Air Quality on site and consideration for joining a Considerate Contractors Scheme. The CEMP shall consider in each case issues relating to construction and demolition - noise, dust, odour, control of waste materials and vibration - where not detailed in a separate condition. Once approved in writing, all identified measures within the CEMP shall be implemented in accordance with the requirements therein and shall be reviewed on a regular basis and in case of receipt of any justified complaint. Any changes to the identified CEMP mitigation measures from either the regular review process or following receipt of a complaint shall be forwarded to the Local Planning Authority within 24hrs of a change being agreed or implemented.

Reason: To prevent an increase in background noise levels and protects the amenity of any residents in accordance with: Policy QE6 of the Adopted Local Plan Core Strategy; Paragraph 123 of the National Planning Policy Framework (March 2012); and Sections 3 and 6 of the Environmental Protection Supplementary Planning Document (May 2013).

10. Notwithstanding the detail shown on Drawing 06006 PO7, a scheme for the diversion of the public right of way route 31 Sutch Lane Bridleway, incorporating access to adjacent properties shall be submitted to and agreed in writing with the local planning authority. The agreed scheme shall be promoted under s257 of the TCPA 1990 and provided prior to construction at no cost to the local authority. For the avoidance of doubt the scheme shall provide safe access to adjacent properties, Sutch Lane and the proposed development via a single arm connection to the existing mini-roundabout with appropriate provision

for all road user types.

Reason – In the interests of highway and pedestrian safety in accordance with policies CS1; CS4; and QE6 of the Local Plan Core Strategy for Warrington.

11. Notwithstanding the alignment shown on Drawing 06006 PO7, the area of highway to be adopted must be constructed to full adoptable highway design standards and conventional construction methods. The final scheme shall avoid tree root protection areas and provide forward visibility of 25m minimum. Junction visibility of 2m by 25m shall be provided at the junction of the public right of way and the proposed access road. The visibility splay shall be in the control of the highway authority, with nothing built planted or allowed to grow above 600mm within the splay.

Reason – In the interests of highway and pedestrian safety in accordance with policies CS1; CS4; and QE6 of the Local Plan Core Strategy for Warrington.

12. Prior to the commencement of development, a scheme for the protection of all tree/ shrubs/ and vegetation to be retained both within and adjoining the site shall be submitted to and approved in writing by the Local Planning Authority. This scheme shall include a construction methodology for the proposed access and any other part of the development hereby permitted which runs through the root protection areas (RPAs) and for the installation of foundations; utility services; drainage systems; hard and soft landscaping implementation and any excavations and level changes in relation to RPAs in accordance with BS 5837:2012. The development shall be completed in accordance with the approved scheme and protective measures being in place for the duration of construction works.

Reason; In the interests of the well-being of existing trees and other planting which make a valuable, positive contribution to the site and its setting and the visual amenities of the area having regard to Local Plan Core Strategy (2014) policy QE7 and QE5 and the Design and Construction SPD.

13. Prior to commencement of earthworks a survey of the site and within 30m for badger setts will occur and the findings supplied to and agreed in writing by the LPA.

Reason - To prevent harm to badgers.

14. No works to trees or shrubs shall occur or demolition commence between the 1st March and 31st August in any year unless a detailed bird nest survey by a suitably experienced ecologist has been carried out immediately prior to clearance and written confirmation provided that no active bird nests are present which has been agreed in writing by the LPA.

Reason - To ensure that birds are protected and their habitat enhanced, in accordance with Circular 06/05, the Wildlife and

Countryside Act 1981 (as amended) and the Conservation (Natural Habitats, & c.) Regulations 2010 and in order to comply with the NPPF and Policy QE5 of the Warrington Core Strategy.

15. Prior to any earthworks a survey for invasive plant species including japanese knotweed and himalayan balsam will occur and the finding supplied to and agreed in writing to the LPA. If any invasive species are present a method statement detailing avoidance, control and eradication measures should also be supplied to and agreed in writing by the LPA, prior to any earthworks.

Reason - To prevent the spread of invasive species.

16. As part of reserved matters, a landscape plan shall be submitted for approval to the Local Planning Authority. The plan shall include measures to mitigate for the loss of trees, shrubs and bird nesting habitat. The approved plan shall be implemented in accordance with the approved details.

Reason - To ensure that birds are protected and their habitat enhanced, in accordance with Circular 06/05, the Wildlife and Countryside Act 1981 (as amended) and the Conservation (Natural Habitats, & c.) Regulations 2010 and in order to comply with the NPPF and Policy QE5 of the Warrington Core Strategy

Appendix 1 – Illustrative Layout



EP4

Site Access Appraisal – Proposed Allocation Site

Land to the East of Pepper Street, Lymm

CT/14224/TN01 – 17 August 2017

Introduction

1. SCP have been instructed by Majornet Ltd to advise on access arrangements associated with the proposed allocation of land to the east of Pepper Street, Lymm for residential purposes. The site is located approximately 650m to the east of Lymm Village and covers an area of 1.70 hectares.
2. Land to the south of Sutch Lane, as shown in Blue below, is also being promoted by Majornet Ltd for residential purposes. There are clear highway benefits should both these sites come forward for development, which is discussed in greater detail later in this report.
3. The site location of both sites is shown on **Figure 1** below:-

Figure 1 – Site Location Plan



Source: Google Maps



4. This technical note has been produced to support the allocation and to demonstrate to the Local Planning and Highway Authority that a safe and suitable access can be provided to serve future residential development on the site.

Existing Highway Conditions

5. The site is located to the east of Pepper Street which provides a link between the site and Lymm High Street in the west, serving a number of residential cul-de-sacs. Pepper Street is subject to a 20mph speed limit, has a carriageway width of approximately 6m and benefits from wide footways and regularly spaced lighting columns. In the vicinity of the site, access is provided to Ravenbank Community Primary School, Sutch Lane and a caravan storage park off a mini-roundabout. The mini-roundabout is also used as a turning circle for parents picking up and dropping off their children during school hours.
6. Sutch Lane borders the southern boundary of the allocation site and is a public right of way that provides a link from Oughtrington Lane to Lymm via Pepper Street.
7. Oughtrington Lane provides a link between Sandy Lane in the north and the A56 in the south. Oughtrington Lane is subject to a 20mph speed limit and benefits from regularly spaced lighting columns and a footway on the western side of the road.
8. The most recently available five-year road safety record in the vicinity of the site has been obtained from the Department for Transport for the period 1st January 2012 to 31st December 2016. Investigations show that one slight severity accident occurred on Pepper Street approximately 45m to the east of the A6144 and one serious severity accident at the Pepper Street / Rectory Lane junction. Having regard to the low number of accidents that have occurred in the vicinity of the site, the existing road safety record does not lead to any significant concern.

Potential Access Arrangements

9. Access to the development will be provided through an extension to Pepper Street. The access has been designed with a 5.5m wide carriageway and a 2m wide footway on the southern side of the road, as shown on Drawing Number SCP/14224/F01 presented in **Appendix A**. The Client understands that the site access can be delivered using land under their control.

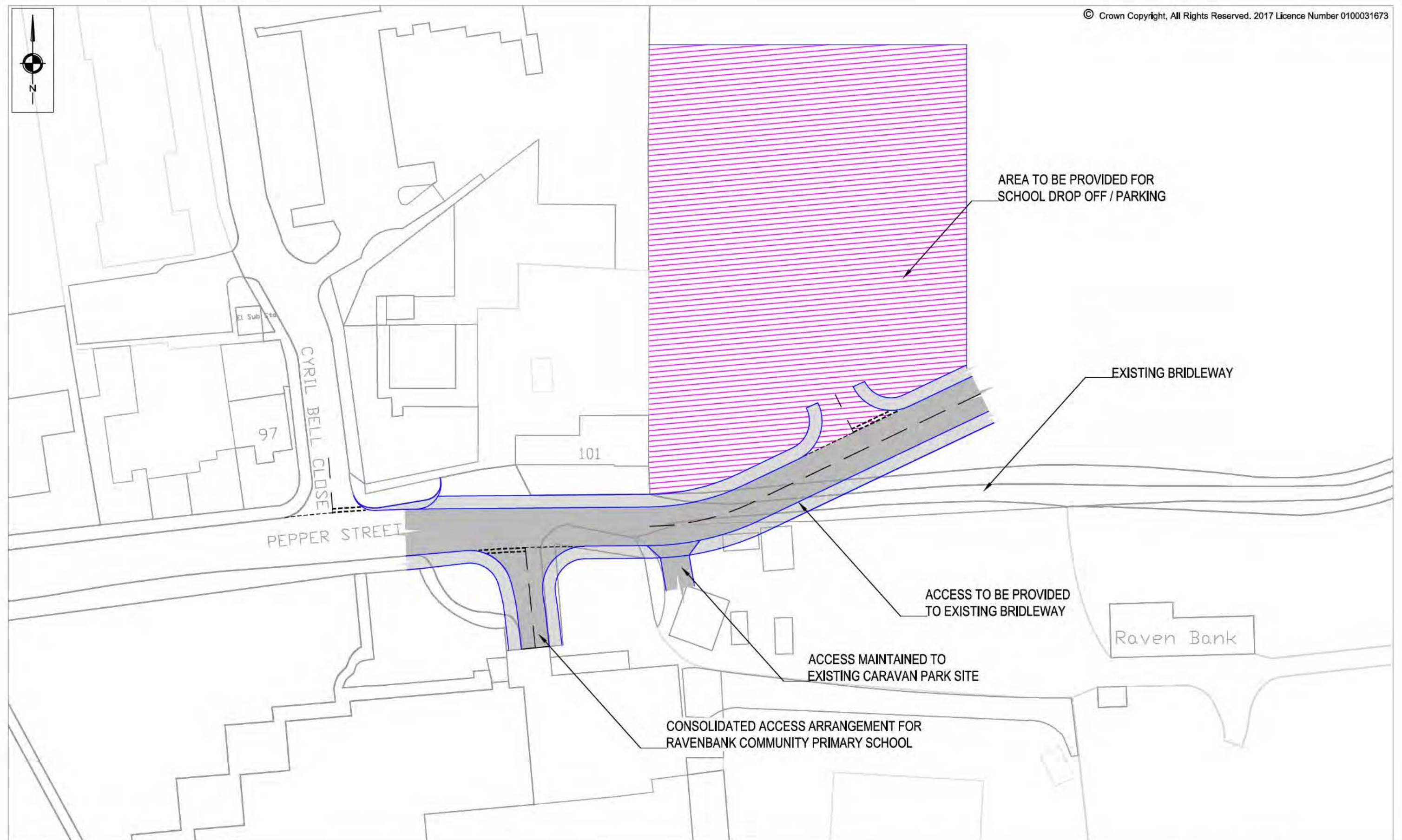
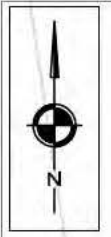
10. It is proposed that a car park and drop off area will be provided for the school within this allocation site which will help to reduce parking / drop off activities and therefore improve conditions on this section of Pepper Street. The existing mini roundabout and access into the school will need to be consolidated, with a potential arrangement for this shown on Drawing Number SCP/14224/F05 presented in **Appendix A**.
11. As detailed earlier, land to the south of Sutch Lane is also being promoted by Majornet Ltd for residential purposes. This would allow a potential link road to be introduced between Pepper Street and Oughtrington Lane which will provide an alternative route for residents travelling to and from the east, helping to relieve pressure on the western parts of Pepper Street and its junction with the A6144.
12. Careful consideration will need to be given to the design of this link to ensure that a balance is struck between providing an alternative route to the east whilst not encouraging significant volumes of through traffic. The land which is being promoted to the south of Sutch Lane has a significant length of frontage onto Oughtrington Lane which provides numerous options in relation to the location and form of junction. However, a potential priority controlled ghost island right turn lane junction option has been developed and is shown on Drawing Number SCP/14224/D01 presented in **Appendix B**. This junction meets all required standards set out in TD42/95 of the Design Manual for Roads and Bridges.
13. Pedestrian and cycle access to the site will be provided from the same location as the vehicular access, with 2m wide footways provided on both sides of the access road. A pedestrian and cycle access will also be provided onto Sutch Lane (public right of way), as shown on the site access drawing presented in **Appendix A**, which provides a link towards Oughtrington Lane.

Summary

14. Having regard to the analysis presented above, there is considered to be no constraints from an access perspective which would prevent this land from coming forward for residential use. Furthermore, should this site come forward in combination with land to the south of Sutch Lane then there are clear highway benefits that can be achieved.

S|C|P

APPENDIX A



S | C | P
 Transportation Planning : Infrastructure Design
 Colwyn Chambers, 19 York Street, Manchester, M2 3BA, Tel 0161 832 4400,
 www.scptransport.co.uk, Email info@scotransport.co.uk

Client	MAJORNET LTD
Project Title	TANYARD FARM, RUSHGREEN ROAD, LYMM

Drawing Title	POTENTIAL ACCESS OPTION OFF PEPPER STREET
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Scale	1:500 @ A3
Date	27.09.2017
Approved/Unapproved	-

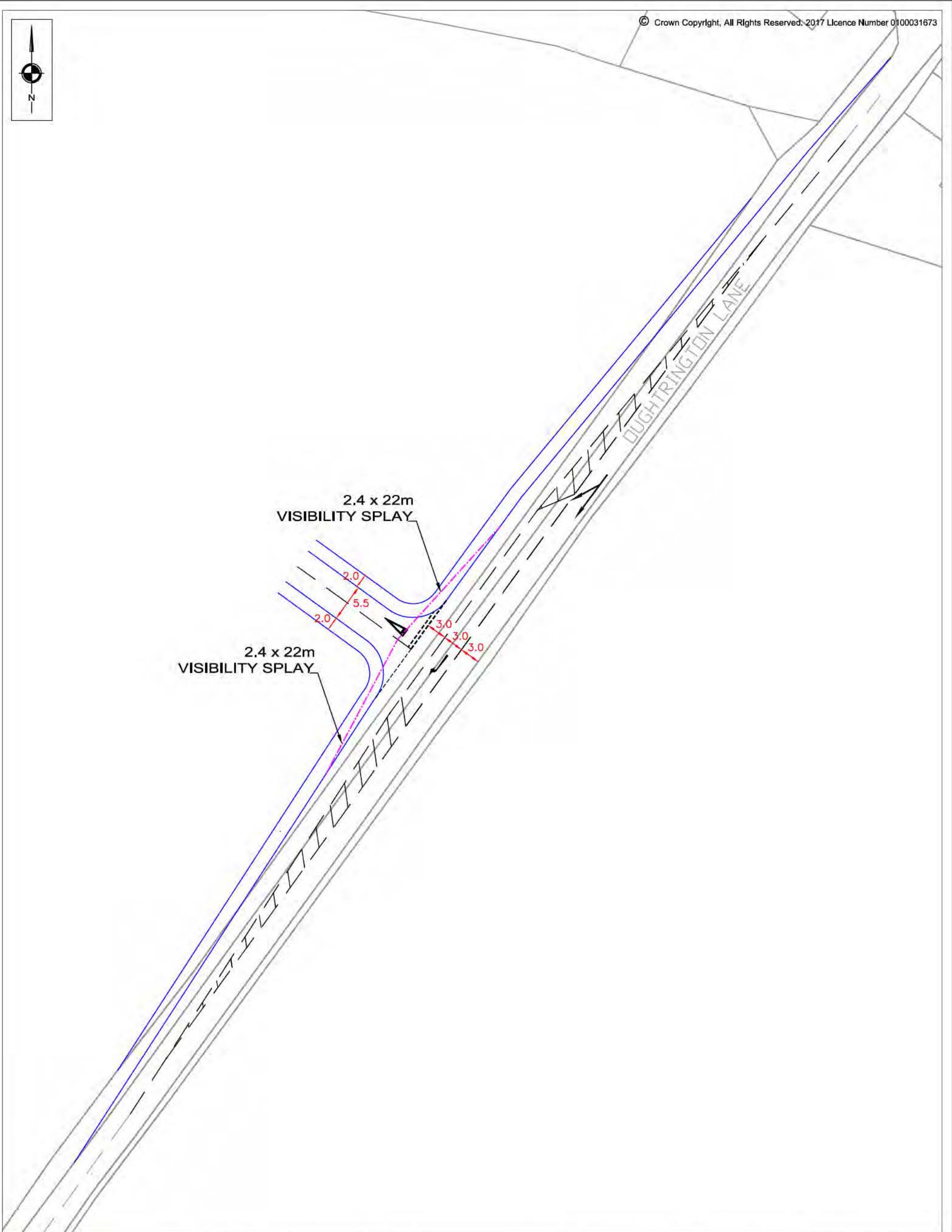
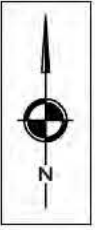
By	BA
Checked	PT
Status	PLANNING

Rev	Description	Date	By
-	-	-	-
-	-	-	-
-	-	-	-
-	-	-	-

Drawing No.	SCP/14224/F05
Revision	-

S|C|P

APPENDIX B



Transportation Planning : Infrastructure Design

Colwyn Chambers, 18 York Street, Manchester, M2 3BA, Tel 0161 832 4400.
www.scptransport.co.uk Email info@scptransport.co.uk

Client MAJORNET LTD	Drawing Title PROPOSED ACCESS GHOST ISLAND RIGHT TURN	Scale 1:500 @ A3	By WD	Drawing No. SCP/14224/D01
		Date 24.08.2017	Checked PT	
Project Title TANYARD FARM, RUSHGREEN ROAD, LYMM		Approved/ Unapproved -	Status PLANNING	Revision -

EP5

TECHNICAL NOTE

Site Access Appraisal – Proposed Allocation Site

Land off Oughtrington Lane, Lymm

CT/14224/TN01 – 16 August 2017

Introduction

1. SCP have been instructed by Majornet Ltd to advise on access arrangements associated with the proposed allocation of land to the west of Oughtrington Lane for residential purposes. The site is located approximately 1km to the east of Lymm Village and covers an area of 8.9 hectares.
2. Land to the east of Pepper Street, as shown in Blue below, is also being promoted by Majornet Ltd for residential purposes. There are clear highway benefits should both these sites come forward for development, which is discussed in greater detail later in this report.
3. The site location is shown on **Figure 1** below:-

Figure 1 – Site Location Plan



Source: Google Maps



4. This technical note has been produced to support the allocation and to demonstrate to the Local Planning and Highway Authority that a safe and suitable access can be provided to serve future residential development on the site.

Existing Highway Conditions

5. The site is located to the west of Oughtrington Lane which provides a link between Sandy Lane in the north and the A56 in the south. In the vicinity of the site, Oughtrington Lane is subject to a 20mph speed limit and benefits from regularly spaced lighting columns and a wide footway on the western side of the road.
6. The most recently available five-year road safety record in the vicinity of the site has been obtained from the Department for Transport for the period 1st January 2012 to 31st December 2016. Investigations show that no reported accidents occurred on Oughtrington Lane in the vicinity of the site. Therefore, the existing road safety record does not lead to any significant concern.

Proposed Access Strategy

7. The proposed allocation site has a significant length of frontage onto Oughtrington Lane which provides numerous options in relation to the location and form of the site access. However, a potential priority controlled ghost island right turn lane junction option has been developed and is shown on Drawing Number SCP/14224/D01 presented in **Appendix A**.
8. The access provides visibility splays that have an 'x' (minor arm setback distance) of 2.4m and a 'y' (major road visibility) distance of 56m in both directions. Based on guidance contained in the Manual for Streets, the visibility splays are commensurate with a 37mph design speed, which is well in excess of the 20mph speed limit of Oughtrington Lane and therefore acceptable.
9. As detailed earlier, land to the east of Pepper Street is also being promoted by Majornet Ltd for residential purposes. This would allow a potential link road to be introduced between Pepper Street and Oughtrington Lane which will provide an alternative route for residents travelling to and from the east, helping to relieve pressure on the western parts of Pepper Street and its junction with the A6144. Careful consideration will need to be given to the design of this link to ensure that a balance is struck between providing an alternative route to the east whilst not encouraging significant volumes of through traffic.

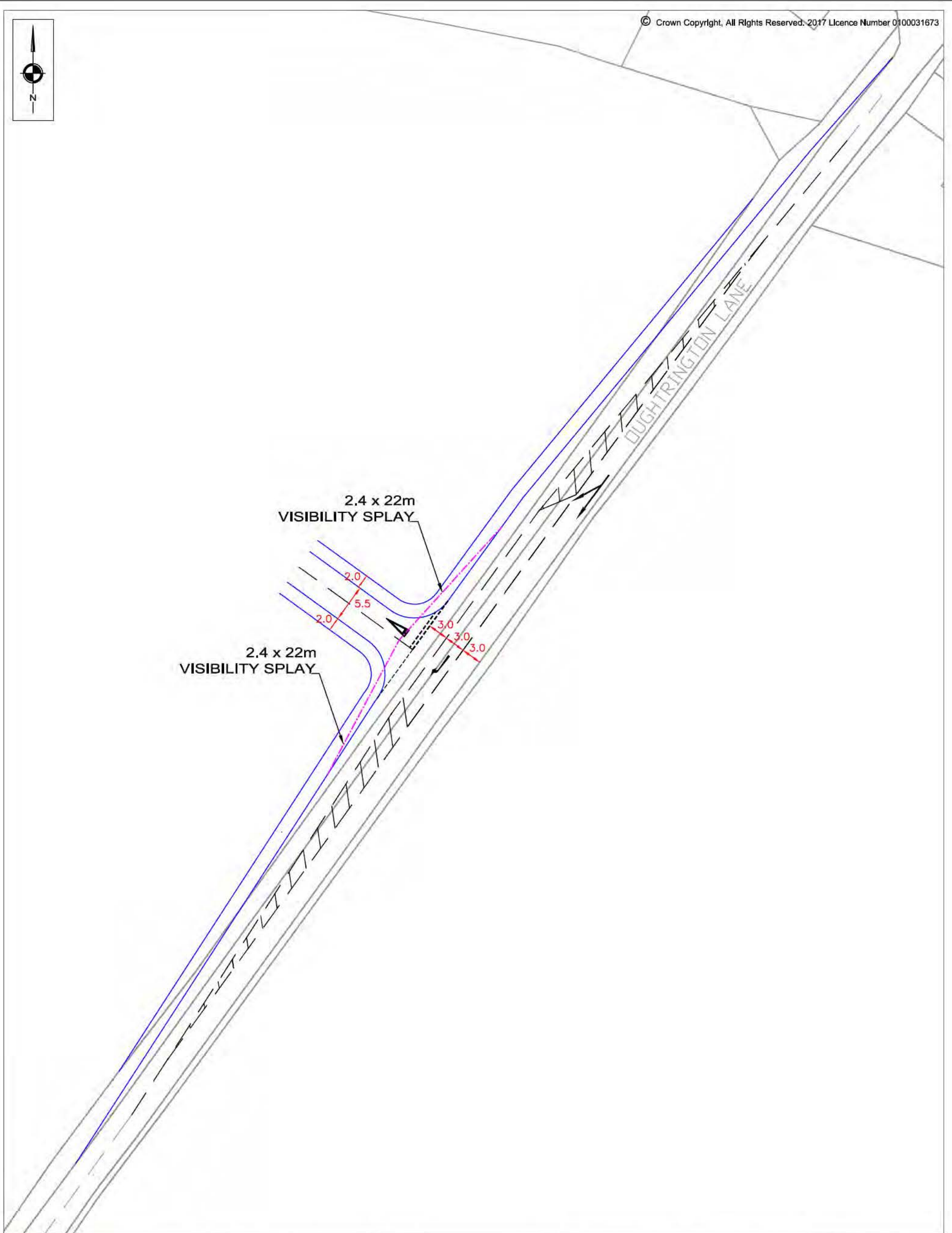
10. Pedestrian / Cycle access to the site will be provided from the same location as the vehicular access, with 2m wide footways provided on both sides of the access road. A pedestrian and cycle access will also be provided onto Sutch Lane (public right of way), as shown on the site access drawing presented in **Appendix A**, which provides a link to Lymm via Pepper Street.

Summary

11. Having regard to the analysis presented above, there are considered to be no constraints from an access perspective which would prevent this land from coming forward for residential use.

S|C|P

APPENDIX A



S | C | P

Transportation Planning : Infrastructure Design

Colwyn Chambers, 18 York Street, Manchester, M2 3BA, Tel 0161 832 4400.
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Client MAJORNET LTD	Drawing Title PROPOSED ACCESS GHOST ISLAND RIGHT TURN	Scale 1:500 @ A3	By WD	Drawing No. SCP/14224/D01
		Date 24.08.2017	Checked PT	
Project Title TANYARD FARM, RUSHGREEN ROAD, LYMM		Approved/ Unapproved -	Status PLANNING	Revision -