

Response 867

Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

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: Nick Scott

Email address: [REDACTED]

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

An agent

3. Please complete the following:

Contact details	
Organisation name (if applicable)	Emery Planning
Agent name (if applicable)	-
Address 1	1-4 Southpark Court
Address 2	Hobson Street
Postcode	SK11 8BS
Telephone number	[REDACTED]

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.

Policy MD3 South West Urban Extension

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

A paragraph number (s)

If a paragraph or policy sub-number then please use the box below to list:
Please see attached representations

—



Local Plan Representations

Representations to the Warrington Local Plan Submission
Version – Land at Runcorn Road, Higher Walton,
Warrington, WA4 6TJ

for [REDACTED]

Emery Planning project number: 19-205

Project : 19-205
Site address : Land at Runcorn Road,
Higher Walton,
Warrington, WA4 6TJ
Client : XXXXXXXXXX
Date : 17 June 2019
Author : Shaun Gaffey
Approved by : John Coxon

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1. Introduction

1.1 Emery Planning is instructed to prepare and submit representations to the emerging Warrington Local Plan consultation on the submission version of the plan. The representations are submitted on behalf of our client, [REDACTED] who owns the land edged red (hereby referred to as 'the site') as set out in the location plan appended to this statement at **EPI**.

1.2 These representations support the site's allocation for residential development, to be delivered as part of draft allocation MD3 (South West Urban Extension). In summary:-

- The site's inclusion within proposed draft allocation MD3 (South West Urban Extension) is fully justified.
- The site makes a weak contribution to the purposes of the Green Belt; particularly in the context of proposed allocation MD3.
- The site is deliverable for residential development and could contribute to the delivery of required housing in the borough; including affordable housing, for which there is an acute need.
- We object to the site forming part of any proposed open space, green buffer or other non-development designation, on the basis that the site could deliver much needed market and affordable housing in the first five years of the plan.

1.3 These comments are fully set out below.

2. Policy MD3 - South West Urban Extension

2.1 We make specific comment to draft policy MD3, which proposes a large-scale mixed use allocation on land which includes our client's site. Full details on site-specifics are provided in section 3 of this report.

2.2 In summary, the allocation of the site as part of Policy MD3 is supported.

2.3 The South West Extension Development Framework document that formed part of the evidence base for the Preferred Options consultation (2017), proposed the following illustrative layout for the draft allocation:

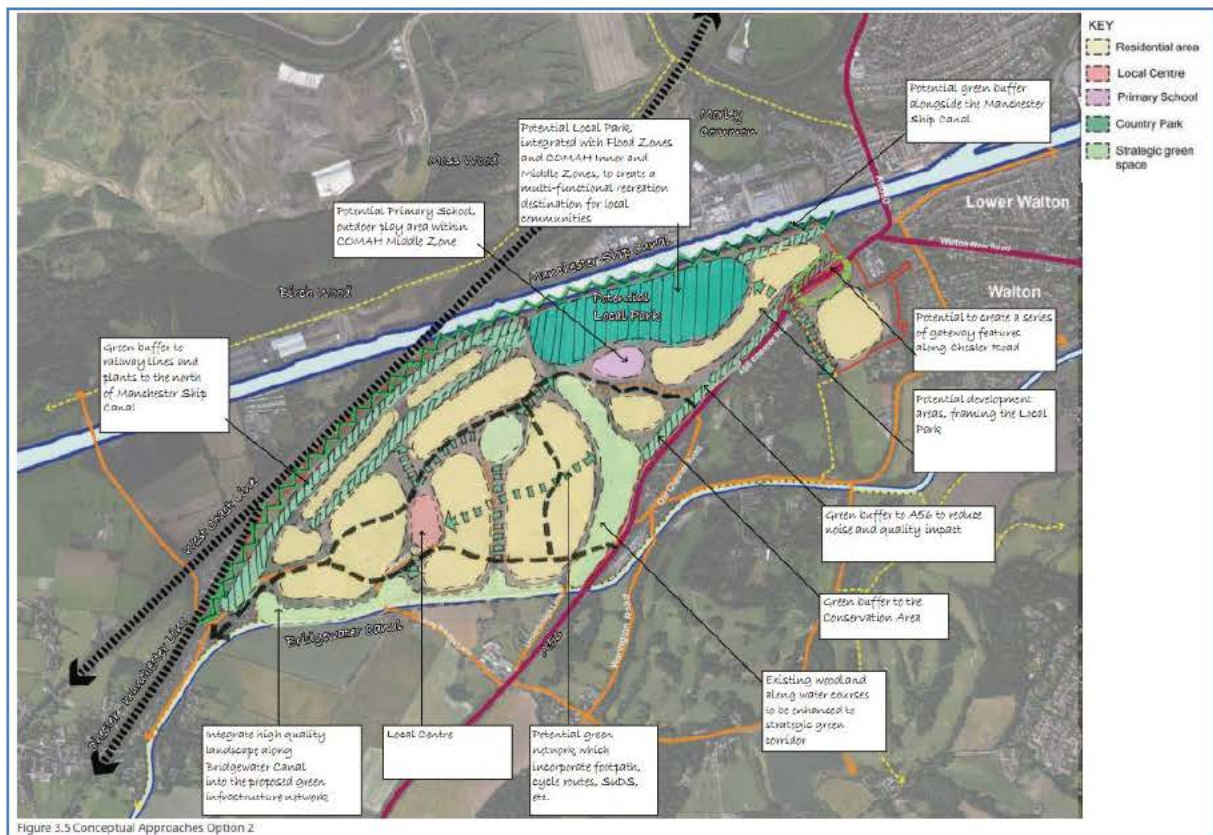


2.4

Figure 1: Preferred Options SW Allocation – SW Development Framework document (2017)

2.5

As set out above, our client's land was proposed to be retained as a wooded area within the allocation. The Preferred Options document itself proposed the following illustrative layout:



- 2.6 The illustrative layout also showed the site being retained as a 'Strategic Green Corridor'; specifically the southern end of the proposed green corridor along Chester Road.
- 2.7 Our 2017 representations were submitted on the basis that the site is a logical omission from the proposed green corridor; and that it was available in the short term and could contribute towards addressing the identified housing supply shortfall. This remains the case in 2019.
- 2.8 No Development Framework document is included as part of the 2019 evidence base. The current Submission Version document sets out the Illustrative Concept Plan for the SW Extension as follows:

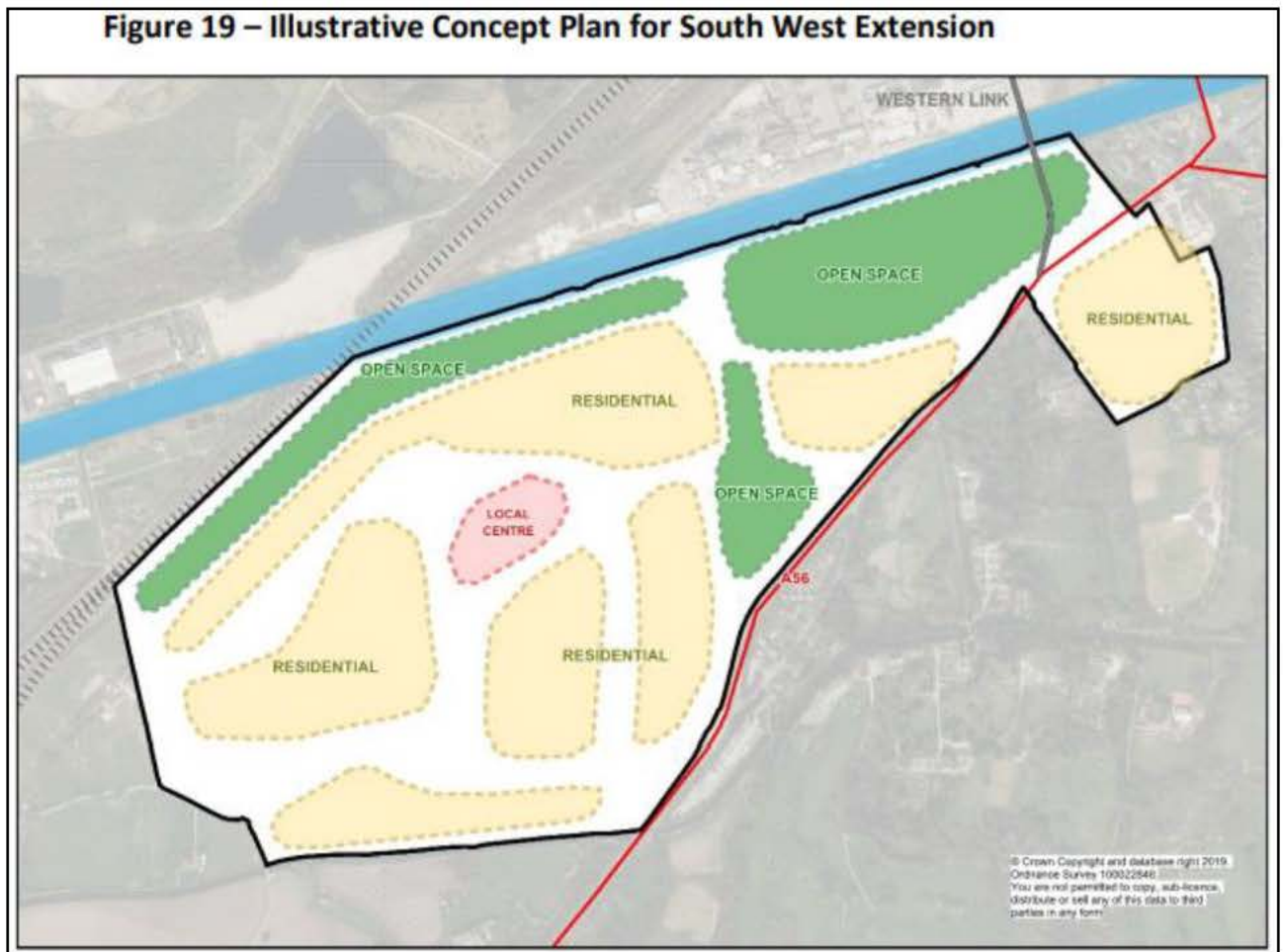


Figure 2: Proposed Submission Version SW Extension (2019)

- 2.9 The plan appears to show our client's site as being within the blank, white strip of land adjacent to proposed residential development, approximately to the south east of the proposed local centre. It is unclear what this land would be used for, as there is no key or labels beyond those shown within the illustrative layout itself.
- 2.10 The illustrative concept plan appears to show that the site would no longer be designated as being within an open space designation such as a 'Strategic Green Corridor'. We support the proposed removal of the site from any such designation.
- 2.11 However, we strongly consider the site should be specifically allocated as a residential designation within draft allocation MD3, and should be identified as such in a detailed development framework going forward.

- 2.12 The site is ideally located in terms of access and proximity to existing built development to the east. Furthermore, it is set within a part of the allocation that is not constrained by the HSE exclusion zone which affects a significant portion of the north and east of MD3.
- 2.13 The proposed allocation has already been reduced in size through removal of unconstrained and developable land to the west, and the allocation of our client's land as open space/'Strategic Green Corridor' would only serve to further reduce the capacity of an already constrained draft allocation. This could threaten the allocation's viability and prevent the delivery of much needed infrastructure and service improvements as set out in the draft policy.

3. Land at Runcorn Road, Higher Walton

Site location and description

- 3.1 The site is a greenfield, triangular parcel of land bounded to the south and east by Runcorn Road and Chester Road respectively. It is bounded to west by woodland and to the north by residential development. The site falls within the proposed South Western Urban Extension (draft policy MD3).
- 3.2 The site benefits from good access, and we are not aware of any issues relating to land contamination, trees, topography or ecology that could not be mitigated by any proposed residential scheme. Furthermore, it is in Flood Zone 1 on the Environment Agency flood risk map, which means that it has a low probability of flooding.
- 3.3 The site has not been assessed individually as part of Site Assessment Proformas (June 2019) or the Development Options and Site Assessment Technical Report (June 2019) exercise but is assessed in the 2019 Sustainability Appraisal. The site was assessed in the Green Belt Assessment (Additional sites - 2017) as part of wider parcel R18/125. It was not assessed in the 2018 Green Belt assessments. Reference is made to assessments of adjoining land, where appropriate.

Green Belt considerations

- 3.4 Paragraph 136 of the NPPF confirms that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The release of Green Belt land for housing development is necessary in order to address the housing needs of the Borough. This comprises exceptional circumstances for the purposes of the NPPF, and is accepted by the authority.

- 3.5 The site currently forms part of the Green Belt. However, it is proposed for removal from the Green Belt as part of the wider MD3 draft allocation. We support the site's removal from the Green Belt and its inclusion within the draft allocation.
- 3.6 Draft allocation MD3 would result in our site being bounded by strong permanent development to the north, south, east and west. Development of the site would clearly not represent urban sprawl, merging of towns or encroachment into the countryside that would unacceptably weigh against its allocation. The site would have clearly defined, strong defensible boundaries that would contain development and would not encourage future sprawl.
- 3.7 The release of Green Belt land across the borough should also be seen within the context of the following bullet points of paragraph 139 of the NPPF:

"When defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- where necessary, identify in their plans 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;*
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."*

- 3.8 The release of our client's site for housing development would help to meet the identified housing requirement. The revised Green Belt boundary of Chester Road to the south would ensure a defensible, permanent and readily recognisable feature.
- 3.9 Paragraph 138 of the NPPF states that when drawing up or reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of

development. We undertake an assessment below of our client's land with regard to the three roles of sustainable development as set out at paragraph 8 of the NPPF:

Economic: New housing development is required across the Borough to include areas of the designated Green Belt in order to ensure that the Borough has a stable workforce in terms of ability and age profile. The construction of new houses would also create construction jobs in the short term, and once occupied, new residents would boost householder spending on goods and services within the surrounding area. New housing development would also generate a New Homes Bonus for the borough. The delivery of the site would also help to ensure delivery of significant infrastructure and services as proposed in draft policy MD3, which would in turn provide employment opportunities as well as opportunities for new and existing residents to spend money in the new local centre.

Social: Paragraph 8 of the NPPF states that one of the requirements is the supply of housing to meet the needs of present and future generations. The allocation within MD3 of our client's site for new housing development would help to ensure that the identified housing needs of the Borough in terms of market and affordable housing are met. The delivery of the site would also help to ensure delivery of significant infrastructure and services as proposed in draft policy MD3, which is already constrained by significant contamination issues associated with land uses adjacent to the northern and eastern boundaries of the allocation.

Environmental: The site is in a sustainable location (as set out by the Council's own justification for policy MD3 and the site assessment in the 2019 Sustainability Appraisal) with easy and convenient access to a wide range of local services and public transport options. The site is located at the edge of Warrington and other significant settlements and is suitable for major new housing developments in terms of infrastructure requirements and landscape impact. The release of this site for housing development would comprise a logical urban extension with negligible impacts in relation to the main purposes of including land within the Green Belt, particularly in the context of draft allocation MD3 on adjacent land to the east.

3.10 The release of our client's site from the Green Belt for new housing development as part of the emerging local plan is considered to be fully justified with due regard to the relevant paragraphs of the NPPF set out above.

Sustainability Appraisal: SA Report (March 2019)

3.11 The SA forms part of the evidence base for the Submission Version Local Plan consultation, and our client's site is assessed as part of wider parcel R18/125. This parcel includes the wider parcel of land proposed for allocation as part of draft policy MDS. The SA assessment is as follows:

directly from its delivery, which means the site would perform even stronger in sustainability terms.

- 3.15 The site would form part of a large-scale urban extension that would ensure the provision of facilities, amenities and services, and the site is suitable for residential development on that basis.

Technical considerations

- 3.16 We are not aware of any site-specific constraints that would prevent the delivery of the site for residential development. The site benefits from good access, and we are not aware of any issues relating to land contamination, trees, topography or ecology that could not be mitigated by any proposed residential scheme. Furthermore, it is in Flood Zone 1 on the Environment Agency flood risk map, which means that it has a low probability of flooding.
- 3.17 Our client would be willing to work with the Council and other stakeholders to ensure the most sustainable scheme possible is delivered on the site. The site's allocation for residential development within MD3 would contribute towards ensuring the delivery of much needed housing in a borough with an acute housing need.
- 3.18 The site could make a high quality and sustainable contribution to the existing built-up area of Warrington. The site could deliver the following:
- A low-density scheme appropriate to the existing urban edge of Warrington that is also sympathetic to smaller settlements to the west and existing built development along Chester Road, with houses sited such that they positively address the public realm.
 - The opportunity for tree planting and other landscaping features along the site boundary.
 - Contributions to play and open space areas, and retention of ecological features such as mature trees that define the site boundary.
 - Desirable linkages with existing development to the east and that proposed through MD3 to the north for existing and future residents, in line with the wider objectives of the South West Extension.
- 3.19 Our client would assist with any masterplanning exercise in partnership with the Council and other stakeholders in order to ensure an optimum relationship with other proposed development within draft allocation MD3.

- 3.20 The primary access point into the site would be off Runcorn Road. Access could be achieved for the proposed quantum of residential development as a standalone allocation, and there are no significant infrastructure requirements for delivery of the site for residential development. Further, it could provide a permeable access scheme, creating a positive 'gateway' relationship with existing development to the east and the wider draft allocation MD3 to the north.
- 3.21 As set out in section 3 of this statement, the above conclusions (particularly with regard to sustainability) are supported by the Council's own conclusions and justification for draft allocation MD3, as well as the individual assessment of the site (R18/125) in the Sustainability Appraisal (2019).
- 3.22 To conclude, the site is suitable, available and achievable for residential development, and we agree with its proposed release from the Green Belt and its allocation as part of draft policy MD3. It is considered that the site could make an early contribution towards achieving the very high housing requirement in the borough, and could come forward in the short term, subject to the masterplanning requirements of Policy MD3.
- 3.23 Furthermore, it could assist with maximising the developable area of the South Western Urban Extension, which has potential constraints in this respect due to the chemical works to the north and the potential link road. Therefore, it should be specifically allocated for residential development as part of any ongoing development framework document and masterplanning exercises.

Local infrastructure

- 3.24 Should proposed draft allocation MD3 be delivered, the site would form part of the developable area in the south, which has a strong relationship with the existing built-up area of Warrington; with no fundamental constraints in terms of utilities and surface and foul water connections. It would be sited in close proximity to existing key services such as schools, health facilities, convenience stores and employment opportunities, as well as within a short distance of smaller settlements and their assorted amenities to the west. This situation would further improve with the delivery of the MD3, which proposes a significant package of infrastructure, amenity and service provision as part of its delivery.

4. Summary and conclusions

- 4.1 In summary, we support our client's site's removal from the Green Belt and its proposed allocation as part of MD3. However, we object to any proposed open space/strategic gap designation for our site and consider it should be specifically allocated for residential development within MD3.
- 4.2 The site is situated within the southern part of the draft allocation, and is not constrained by technical issues such as land to the north and east of the parcel. On this basis, it is considered that the southern parts of the allocation must be delivered as residential development in order to ensure the viability of the allocation, and the delivery of all proposed infrastructure within it.
- 4.3 Our site-specific representations can be summarised as follows:
- The release of the land from the Green Belt for housing as part of Policy MD3 is fully justified in line with the requirements of the NPPF.
 - It is well related to existing residential development to the east, and its development would not appear incongruous in landscape terms.
 - There are no site-specific constraints to delivery of the site as a residential allocation.
 - There are no obstacles to the delivery of this site for the quantum of residential development identified from a highways and transport perspective.
 - The site is sustainable in terms of access to key services and public transport. This is confirmed by the authority's own justification for the adjacent draft allocation MD3, which also proposes direct delivery of key services, including public transport packages and a primary school.
- 4.4 The allocation of the site would contribute towards meeting identified housing needs in Warrington, and would assist in ensuring the viability of draft allocation MD3.

5. Appendices

- EP1. Site location plan

EP1

Site Location – Land at Runcorn Road

