

# Response 878

## 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)	-
Agent name (if applicable)	Emery Planning
Address 1	1-4 Southpark Court
Address 2	Hobson Street
Postcode	SK10 4LF
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 MD2 Garden Suburb

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:**  
Please see attached representations

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached representations

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:**  
Please see attached representations

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.

- [REDACTED] esentations - Warrington Local Plan Submission Version - Bradley View Cliff Lane Grappenhall combined(1.0).pdf -

**Comments/file description**

Re [REDACTED] to the Warrington Local Plan Submission Version relating to Bardley View, Cliff Lane, Grappenhall - submitted on behalf of [REDACTED]

You have just completed a Representation Form for Policy MD2 Garden Suburb. What would you like to do now?  
Please select one option.

Complete the rest of the survey (Part C)



## Local Plan Representations

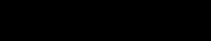
Representations to the Submission Version Warrington  
Local Plan – Bradley View, Cliff Lane, Grappenhall,  
Warrington, WA4 4SL

for



EP Ref: 19-268



Project : 19-268  
Site address : Bradley View, Cliff Lane,  
Grappenhall,  
Warrington, WA4 4SL  
Client :   
Date : 11 June 2019  
Author : Shaun Gaffey  
Approved by : Rawdon Gascoigne

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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, which closes at 5pm on 17 June 2019. The representations are submitted on behalf of [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 **EP1**. The client also owns a small parcel of land adjacent to the southern boundary, which includes the ponds.
- 1.2 In summary, these representations support the site's inclusion within the proposed employment allocation that forms part of the wider proposed Warrington Garden Suburb. We have conducted a full review of the emerging plan and supporting evidence base, and make the following comments:
- We support the site's inclusion within the proposed Warrington Garden Suburb.
  - The site is deliverable for employment development in the short term, and would make an immediate contribution to the delivery of the first phase of the Warrington Garden Suburb.
  - We object to the site's current designation in the indicative masterplan as open countryside land.
  - There are no technical constraints that would materially weigh against the site's delivery as employment land in phase 1 of the Warrington Garden Suburb.
- 1.3 These comments are fully set out below.

## 2. Site location and description

- 2.1 The site is a triangular parcel of land located to the south east of Grappenhall. It includes a dwelling, outbuildings and associated curtilage, but is mainly undeveloped and in agricultural use. It is bounded to the north by Cliff Lane, to the south east by the access road that comes off Cliff Lane, and to the south west by agricultural land and a number of existing dwellings.
- 2.2 The site has a direct relationship with the local road network, and is approximately 100m from the M6 motorway and is less than a kilometre from the M56. It is well related to existing industrial/employment development to the west.

- 2.3 The site benefits from its own access, and we are not aware of any ecological, topographical or contamination issues. The site is located within Flood Zone 1 as identified on government flood risk maps. It is not at risk of flooding from surface water.
- 2.4 The site is located within 400m of the Scheduled Monument identified on the Historic England electronic database as the Bradley Hall moated site, which is located to the south of the site along the same access road.

### 3. Proposed allocation

#### Policy MD2 - Warrington Garden Suburb

- 3.1 The site is included within the proposed Warrington Garden Suburb, which is fully set out in draft policy MD2. On proposed employment land specifically, MD2 states the following:

*"15. The new employment development will not be permitted until the funding and the programme for the delivery of the improvements at Junction 9 of the M56 and Junction 20 of the M6 have been agreed with key stakeholders, including Highways England and the Local Highway Authority*

*27. The development will be required to deliver up to 116 hectares of employment land to meet strategic and local employment needs on land allocated at the junction of the M6 and M56.*

*28. The employment land is allocated for distribution and industrial uses (B8, B1c and B2).*

*67. The Garden Suburb contains a number of heritage assets, including listed buildings, locally listed buildings and a Scheduled Monument. Development will be required to be designed in order to ensure that these assets and their settings are conserved and, where appropriate, enhanced within the context of the overall development, through appropriate mitigation measures, having regard to the Garden Suburb Heritage Impact Assessment.*

*68. The Bradley Hall Moated Site Ancient Monument is of particular significance given its location within the Employment Area. A landscape buffer between the monument and new employment development will be required to preserve the immediate open setting of the moated site."*

- 3.2 We support the Council's commitment to improving key junctions of the M56 and M6. However, any slippage on this front should not preclude the delivery of much needed employment sites in the first phase of development of the Garden Suburb. As set out in the 'Update to the Economic Development Needs Assessment (February 2019)' document which forms part of the

evidence base for this consultation, there is a total shortfall of 277.80ha of employment land that needs to be addressed through this plan. Our client's site could make an immediate contribution towards addressing this shortfall, and is deliverable in the first five years of the plan.

- 3.3 Furthermore, it forms part of a wider parcel of land which has already been assessed by the Council in the Update to the Economic Development Needs Assessment ('EDNA') identified as land parcel R18/106, R18/P2/145. Our client's site was not promoted to the original call for sites exercise and the Regulation 18 version of the plan, which means it was not included within this assessment. However, it is adjacent to this parcel and is the only parcel of land west of the access road off Cliff Lane that was not assessed in the EDNA and bears near identical characteristics.
- 3.4 The EDNA grades parcel R18/106, R18/P2/145, which proposes 92ha of employment land, as 'Grade A' employment land, stating in its assessment that:

*"Land under option to developer(s), with identified growth plans and history of delivery Links to wider identified area of strategic/local market demand with prospects of common provision of access infrastructure across multiple interlinked sites."*

- 3.5 The parcel is subsequently proposed as a draft allocation for industrial/storage development. Our site forms part of this parcel. It makes no contribution to the Green Belt, particularly in the context of the wider proposed allocation and we support its inclusion in the Warrington Garden Suburb on that basis.
- 3.6 The site is located approximately 400m north of the Bradley Hall moated site, which is further than a significant amount of other land proposed for employment use. Further, the site is well screened from the Scheduled Monument by existing development and other features such as trees and hedgerows. With sensitive design and screening features, the site could clearly be delivered for employment use without materially impacting the setting of the heritage asset, as per the requirements of the National Planning Policy Framework.

### **Warrington Garden Suburb Development Framework (March 2019)**

- 3.7 This Framework has been prepared by the authority in order to ensure that the proposed Warrington Garden Suburb is deliverable. It sets out purely illustrative details on how the wider allocation could be delivered through the proposed submission version of the plan and beyond.



3.8 Section 7 of the Development Framework sets out the Garden Suburb Design Principles and Placemaking. The section relevant to our client's site is set out on page 86 – Employment Area Placemaking Principles. It states that:

*"Primary access to the northern parcels should be achieved from Grappenhall Lane. The southern parcels can be accessed via Barleycastle Lane".*

3.9 Our site would form part of the northern parcels, and access could be achieved from both Grappenhall Lane and Cliff Lane, as per the aspirations of the Development Framework. Further, the site could potentially provide part of the wider access to the employment zone, improving permeability and thus limiting pinch/pressure points in future.

3.10 The Development Framework sets out an indicative masterplan for the proposed employment allocation as follows:



Figure 1: Employment Area Concept Masterplan

3.11 The site is currently proposed as open countryside immediately to the south of the existing Cliff Lane/Grappenhall Lane roundabout. It is assumed that this is the case because the site was not

promoted through the call for sites exercise and was therefore not assessed in the EDNA. We also note that the Council states that:

*"the framework document and the plans within it are purely illustrative. They have no formal planning status and are not approved as Council Policy."*

3.12 However, it is important to state that our site is deliverable as an employment allocation and does not make any material ecological or heritage contribution to justify its allocation as an area of open countryside. Further, the allocation of land to the north, east and west for employment development would blight the site should it not be included within it, which would be unacceptable given that it is the primary residence of our client.

3.13 The site is deliverable in the short term for employment purposes, and would make an immediate and positive contribution to delivering the proposed employment allocation in 'Phase 1', which:

*"incorporates three non-Green Belt sites within Villages A and B, and will deliver 930 housing units. These areas are ostensibly an extension of existing settlements and would be developed in parallel with the establishment of the Country Park as a recognised asset that can mature and evolve as the WGS community grows. Alongside the new homes approximately 116 ha of new employment land could be delivered close to the junction 9 of M56. Enabling infrastructure including new strategic movement and utilities corridors will also be required to provide the anticipated level of connectivity throughout the area."*

3.14 We support the Council's aspiration of delivering employment land in the first phase of development in the Warrington Garden Suburb and consider the site can play an integral role in achieving the proposed quantum of development.

3.15 On this basis, it is considered that the site must be included within the purple shaded area, and allocated for employment use in the first phase of development of the Warrington Garden Suburb.

### **Site specific considerations**

3.16 As stated above, the proposed indicative designation as open countryside within the wider employment allocation is inappropriate for the site, particularly when assessed in parallel to the wider parcel to the west. It is a site bounded on multiple sides by proposed employment development and would be a highly logical rounding off of the proposed allocation.

- 3.17 The site is not physically constrained by flood risk, ecological issues or topography and has good access to Cliff Lane and potentially Grappenhall Road (which has been identified in the Development Framework as the primary access point for the northern proposed development parcels) to the north and the surrounding highway network, including the M56 and M6.
- 3.18 The site is highly sustainable in the context of the wider proposed employment allocation, as well as its relationship with existing employment land to the west. It is also well related to local infrastructure and amenities.
- 3.19 The site is available and suitable for employment development and would be deliverable in the first phase of the proposed garden suburb. Removal of this site from the Green Belt would not harm the purposes of the Green Belt and would provide deliverable employment development which would immediately contribute towards the Borough's significant employment land requirement.
- 3.20 This concludes our representations.

## **4. Appendices**

- EP1. Site location plan

EP1



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