

Response 920

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: Nick Scott

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

An agent

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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.

Policy DEV1 Housing Delivery

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

Both of the above

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

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Representations to the Submission Draft (Policies DEV1, MD1, MD2 & MD3)

Warrington Local Plan Regulation 19

for Wainhomes (North West) Ltd

Emery Planning project number: 19-202

Project : 19-202
Site address : Warrington Local Plan,
Warrington, TBC
Client : Wainhomes (North West)
Ltd

Date : 17 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 suggests 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 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.
- 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 and it 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.

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

Representations to the Warrington Local Plan Submission
Version (Draft Policy OS1) – Land at Lumber Lane,
Burtonwood, Warrington, WA5 4AX

for Wainhomes (North West) Ltd

Emery Planning project number: 17-024

Project : 17-024
Site address : Land at Lumber Lane,
Burtonwood, Warrington,
WA5 4AX
Client : Wainhomes (North West)
Ltd

Date : 7 June 2019
Author : Shaun Gaffey

Approved by : John Coxon / Stephen
Harris

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

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Emery Planning Partnership Limited
trading as Emery Planning.

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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 Wainhomes (North West) Limited, who have an option on the land edged red (hereby referred to as 'the site') as set out in the location plan appended to this statement at **EP1**.
- 1.2 In summary, these representations propose the site's allocation for residential development, to be delivered alongside the adjacent proposed draft allocation OS1 (Burtonwood) in the early stages of the plan.
- 1.3 We have conducted a full review of the emerging plan and supporting evidence base, and make the following comments:
- The site makes a weak contribution to the purposes of the Green Belt; particularly in the context of proposed allocation OS1 on adjacent land to the west.
 - The site is deliverable for residential development in the short term, and would make an immediate contribution to the delivery of required housing in the borough; including affordable housing, for which there is an acute need.
 - The site should be designated as safeguarded land at the very least, in order to provide flexibility should other proposed allocations fail to deliver, or for housing beyond the plan period.
 - There are no technical constraints that would materially weigh against the site's delivery as a standalone residential allocation that has almost identical properties to proposed draft allocation OS1.
- 1.4 These comments are fully set out below.

2. Policy OS1 – Burtonwood

- 2.1 We make specific comment to draft policy OS1, which proposes a residential allocation on land adjacent to the western boundary of our site.
- 2.2 In summary, it is considered that the allocation should be expanded to include all land between Lumber Lane and Green Lane, including our client's site, with identified land being removed from the Green Belt and allocated and/or safeguarded for residential development. Strategic representations submitted separately on behalf of Wainhomes confirm there is a need for additional sites, and it is considered that this entire land parcel could come forward as one allocation to help address this requirement.
- 2.3 In the alternative, our site is proposed as an allocation in its own right. Full details of the site are provided in section 3 of this statement.
- 2.4 As set out in full below, the Council's Green Belt Assessment concluded that wider parcel BW3 made a 'moderate' contribution to the openness and main purposes of the Green Belt. All other parcels in Burtonwood were assessed as making a 'strong' contribution. This is reflected in draft allocation OS1, which proposes the delivery of adjacent land to the west of the site for residential development:



Figure 1: Draft Allocation OS1 - Burtonwood

- 2.5 The allocation of this land further confirms the suitability of our client's site, which has a virtually identical relationship with Burtonwood in that it has strong, defensible urban features of existing residential development to the south and east, as well as the clearly defined Lumber Lane to the north. Should the allocation proposed in OS1 come forward, the site would also have residential development on adjacent land to the west.
- 2.6 In this context, the site is clearly a logical infill/rounding off of existing (and proposed through OS1) development, and makes an even weaker contribution to openness and the main purposes of the Green Belt.
- 2.7 Paragraph 10.5.1 of the justification for policy OS1 states that:
- "The development will provide a high quality residential setting with ease of access to existing local services and facilities in Burtonwood and employment opportunities at Omega/Gemini."*
- 2.8 Paragraph 10.5.4 states that:

"Its location will ensure good access to services in Burtonwood local centre, Warrington Town centre, and major existing and proposed employment areas at Omega/Gemini."

2.9 Paragraph 10.5.6 concludes that:

"The greenfield and relatively unconstrained nature of the site will enable the site to be delivered in the early part of the Plan period. Developers promoting the site have confirmed their commitment to ensuring a comprehensive form of development and their support of the build rates which have informed the development trajectory."

2.10 All of the above applies to our client's site. Wainhomes are an active developer with an excellent track record of delivering high quality residential development throughout the North West of England. Delivery of the site would provide high quality residential development, including affordable housing for which there is an acute need throughout the borough. It would be similarly well related to Burtonwood centre, Warrington centre and employment areas at Omega/Gemini.

2.11 Further, there are similarly no technical constraints (fully discussed in section 4 of this statement) that would prevent the site from delivering residential development in the early period of the plan.

2.12 Separate strategic representations are also submitted to this consultation on behalf of Wainhomes. In summary, it is considered that the authority has not allocated enough residential sites to meet its requirement over the plan period. Subsequently, additional sites must be allocated to provide the required numbers as well as providing flexibility in the supply should other proposed allocations fail to deliver at the anticipated rates.

2.13 Our client would not object to the site coming forward as part of a wider allocation under OS1. Wainhomes has an excellent track record of working with other developers to deliver large-scale, coherent residential allocations and would be open to collaborating on a wider masterplan that would deliver a logical extension to Burtonwood with strong defensible boundaries on all sides that would minimise any impacts on the purposes of the wider Green Belt in this location.

2.14 On this basis, it is considered that the site should be allocated for residential development as part of the submission version of the local plan. It is considered that the site could deliver residential development in the first five years of the plan as a standalone allocation. There are

no constraints with access or ownership, and the site could make an immediate contribution towards delivering the required housing in Warrington.

- 2.15 At the very least, the site should be safeguarded for future residential development, either beyond the plan period or in the event of a failure in delivering the required housing numbers during the plan. Lumber Lane and Green Lane are logical boundaries that would ensure the allocation of land for much needed residential development, without unacceptably encroaching into the wider Green Belt in this location.

3. Land at Lumber Lane, Burtonwood

Site location and description

- 3.1 The site is located adjacent to existing residential development in Burtonwood. It comprises fields and equates to a site area of approximately 10ha. It falls within the ownership of two interested parties. A location plan is appended at **EP1**.
- 3.2 The site adjoins the built-up area of Burtonwood to the southern and eastern boundaries comprising residential estates and an industrial estate. It is bounded by the Lumber Lane highway to the northern boundary and a field to the western boundary with residential development along Green Lane beyond. This field on the western boundary is land proposed for residential development as part of draft policy OS1 (Burtonwood).
- 3.3 In summary, the site represents a logical and small-scale extension to the existing settlement of Burtonwood, and a logical rounding off opportunity in the context of proposed allocation OS1 being identified for residential development, with strong defensible boundaries.
- 3.4 We have previously made representations with regard to this site through the Warrington Local Plan Regulation 18 Consultation (December 2016), and the Preferred Development Option (2017).

Green Belt Considerations

- 3.5 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 meet unmet and future housing needs of Burtonwood and the wider Borough. This comprises exceptional circumstances for the purposes of the NPPF, and is accepted by the authority.
- 3.6 Our client's site was assessed through wider parcel BW3 through the Warrington Green Belt Assessment (2016) :

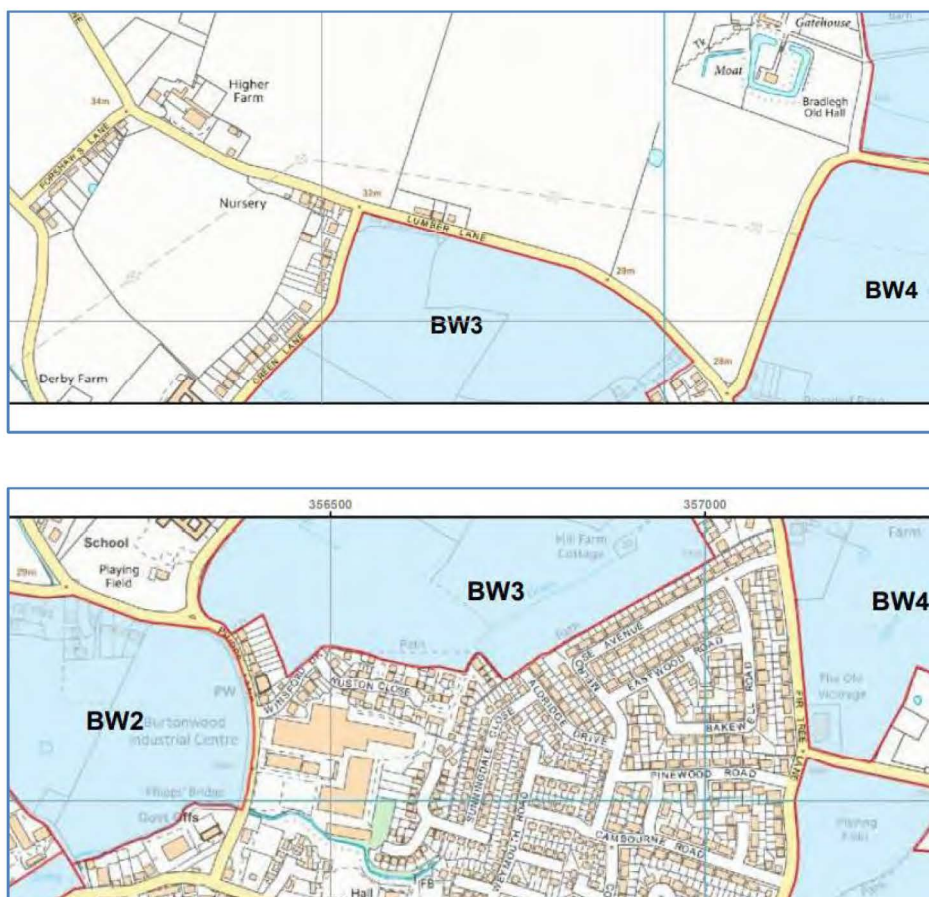


Figure 2: Green Belt Assessment (2016) - Parcel BW3

- 3.7 We made the case in our representations to the Preferred Options consultation in 2017 that our client's site was clearly the most logical for release from the Green Belt and that development would have the least Green Belt impact in the context of Burtonwood.
- 3.8 A site-specific impact of our client's site by ARUP on behalf of the Council in 2017 (Site ref: R18/054) concluded that the site made a 'moderate' contribution to the openness and main purposes of the Green Belt. The site was not reassessed as part of the additional assessment exercise conducted by the authority in 2018.
- 3.9 Tyler Grange were instructed to conduct an independent assessment of the site's impact on the Green Belt and concluded that the site made a 'weak' contribution. We enclose the assessment at **EP2** for ease of reference.
- 3.10 The Tyler Grange report assesses the site against the first four of the key purposes of the Green Belt as set out at paragraph 134 of the NPPF. The fifth was not assessed as the need for Green Belt releases is accepted by the authority. The key findings are summarised below:

Main purpose	Summary assessment undertaken by Tyler Grange
To check unrestricted urban sprawl	<p>The site is bounded by existing built development to the southern and eastern boundaries and the built-up area of Burtonwood. There is Lumber Lane to the northern boundary and residential development along Green Lane to the western boundary.</p> <p>These boundaries provide a robust, permanent and defensible edge such that development would not sprawl any further northwards, eastwards or westwards.</p>
To prevent neighbouring towns merging into one another	<p>The physical barriers provided by Lumber Lane and the built-up area of Burtonwood would contain any future development, which would be viewed as a consolidated settlement edge to Burtonwood.</p> <p>There are no issues in terms of the merging of settlements.</p>
Safeguarding the countryside from encroachment	<p>Although the site is presently open and undeveloped, it is influenced by the adjacent built development within Burtonwood and the Lumber Lane highway. With planting carried to the edges of the site, any development will assimilate with the landscape.</p>
Preserve the setting and special character of historic towns	<p>The site does not play a role in the setting or significance of the historic settlements.</p>

- 3.11 Tyler Grange set out in their conclusion that the site is considered capable of being developed without resulting in unrestricted urban sprawl or coalescence of urban areas and with respect to landscape and visual matters. On this basis, it was considered that our site makes a 'weak' (i.e. the least harmful impact if developed) contribution to the openness and main purposes of the Green Belt.
- 3.12 This remains the case and is further supported by the allocation of adjacent land to the west through draft policy OS1 (fully assessed below). Draft allocation OS1 would result in our site being bounded by urban features 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.
- 3.13 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."*

- 3.14 The release of our client's site for housing development would help to meet the identified housing requirements for sustainable development. The revised Green Belt boundary of Lumber Lane to the north would ensure a defensible, permanent and readily recognisable feature to the north.

3.15 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.

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 release 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.

Environmental: The site is in a sustainable location (as set out by the Council's own justification for policy OS1) with easy and convenient access to a wide range of local services and public transport options. The site is located at the edge of Burtonwood 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 OS1 on adjacent land to the west.

3.16 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.

Site Assessment Proformas (June 2019)

3.17 Warrington Borough Council has carried out assessments of sites put forward to past consultations as part of the evidence base for the proposed Submission Version of the plan. Our client's site is identified as Site Ref: R18/054 / Site Ref: R18/P2/028.

3.18 The assessment confirms the following:

- Site access could be created from Lumber Lane
- The topography of the site is relatively flat
- The neighbouring uses of the site are residential to the south, and open countryside on the remaining boundaries, some of which are in agricultural use.
- There are overhead power cables across the site

- There are four very small areas of potentially contaminated land in the south of the site.

3.19 We disagree with the assessment of the site boundaries. The site is bounded to the south and south east by existing residential development in Burtonwood, and is bounded to the north by Lumber Lane, from which access would be created. Further, should draft allocation OS1 come forward for delivery, the site would also be bounded to the west by residential development. The site has very similar characteristics to that allocated in OS1.

3.20 The latest SHLAA (2018) assesses our client's site under site references 1534 and 2146, and both are assessed as constrained due to Green Belt policy, stating that;

"Sites within the Green Belt, unless in compliance with the provisions of appropriate development as defined by the NPPF, are considered unsuitable due to policy constraints. In such circumstances, it is premature for the SHLAA to endorse specific sites in the Green Belt as suitable for residential development in advance of any comprehensive review of Warrington's Green Belt to evaluate whether there are appropriate locations for future development."

3.21 The proposed allocation OS1 was similarly assessed as part of SHLAA reference 1654.

3.22 We note this as the Site Assessment Proforma for our client's site concludes the following on access:

"Appropriate vehicular access to Lumber Lane is achievable within the site edged red. However, whilst a pedestrian footway could be provided along the site frontage, there is no pedestrian footway to connect to on the south side of Lumber Lane; existing properties on Lumber Lane to the west between the site and Green Lane are built up to the carriageway whilst No.144 Lumber Lane to the east limits any footway width. This limits pedestrian accessibility between the site and the existing community. If both Site Refs: 1534 & 1654 were developed in tandem then improved connectivity could be provided, including pedestrian linkage between existing bus services on Lumber Lane and Phipps Lane."

3.23 Firstly, we object to the assessment that commensurate footways could not be provided along the site frontage to the east and south towards Burtonwood. Should there be an issue with providing sufficient width at 144 Lumber Lane, there are numerous other solutions; including diverting the footway through the site, or even providing safe crossing point to the eastern side of Lumber Lane which already has an appropriate footway.

3.24 Notwithstanding the above, the highways comments further supports the allocation of our client's site as part of a wider allocation that would provide safe, permeable pedestrian walkways that would benefit the existing community and future residents.

3.25 The Site Assessment Proforma for our client's site concludes that:

"This site is considered to be suitable – unlikely to have a major impact on trends. The site appears to be available, considering that it was promoted by the owner. The site may be achievable in that it is in an area of moderate viability however there are known abnormal development costs due to four very small areas of potentially contaminated land in the south of the site which could be overcome."

Workshop Comments

The site is adjacent to the settlement of Burtonwood being located to the north of the settlement off of Lumber Lane. The site is considered to be in a sustainable location and is available having been promoted by the site owner. The site may be achievable as there is developer interest and known demand however there are four very small areas of potentially contaminated land in the south of the site, which could be overcome. The site has been judged to be suitable - unlikely to have a major impact on trends. As such, the site would be in accordance with the objectives set out in the draft Warrington Local Plan including objective W1 to strengthen existing neighbourhoods, W2 to facilitate the sensitive release of Green Belt, W4 to promote sustainable modes of transport, and W6 to minimise the impact of development on the environment.

After further consideration of the Council's highways officer's comments, this site has been excluded from the process as an appropriate pedestrian footway to connect the site to the existing community cannot be provided if the site is brought forward on its own. If the site is brought forward in conjunction with site ref: 1654 then the resulting site would be beyond the housing requirement for Burtonwood."

3.26 As set out above, it is considered that any concerns relating to the provision of pedestrian links to the existing community could be overcome in numerous ways. Furthermore, the authority's own highways team considers pedestrian footways could be addressed should the site be delivered as a wider OS1 allocation that included our client's land. We support this approach but also consider the site could address all technical issues and be delivered as a standalone allocation.

3.27 We object to the authority's conclusion that the site could not come forward as part of a wider allocation due to the resulting site being beyond the housing requirement for Burtonwood. As

fully set out in our strategic representations for Wainhomes, there is a requirement for the allocation of additional sites if the Council is going to meet its housing requirement. The allocation of our client's site as part of a wider allocation would deliver a coherent extension to Burtonwood that would create significant benefits in terms of pedestrian access, permeability and open space provision.

- 3.28 Furthermore, it is not appropriate to exclude the site on the basis that its delivery would be "beyond the housing requirement for Burtonwood". Burtonwood's requirement (which we consider to be higher than the Council's assessment) is not a cap, and should not be used to prevent the delivery of sustainable development that would provide a more coherent urban extension than that currently proposed in policy OS1. This is confirmed in the Site Assessment Proforma for draft allocation OS1 (2018 SHLAA ref: 1654 / Site Ref: R18/083 / Site Ref: R18/P2/075 / Site Ref: R18/P2/128) which states that:

"If both Site Refs: 1534 & 1654 were developed in tandem then improved connectivity could be provided, including pedestrian linkage between existing bus services on Lumber Lane and Phipps Lane."

- 3.29 It is clear from the Council's own assessment that the site would provide clear highways/access benefits should it be delivered as part of draft policy OS1, as well as the significant benefits associated with the delivery of required additional housing in the early phase of the plan.

Sustainability Appraisal: SA Report (March 2019)

- 3.30 The SA forms part of the evidence base for the Submission Version Local Plan consultation, and assesses our client's site as per the 2018 SHLAA references (1534 and 2146) as follows:

Outlying settlements

Table 6.3: Housing site options (Outlying settlements)

AECOM ID	Site ID	Site Name	Urban location	EC1. Loss of employment land	EC2. Distance to Principal Road Network	EC3. How close to key employment sites	HW1. Supported by community facilities	HW2. Access to local natural greenspace	HW3. Access to formal play space	ACC1. Access to nearest primary school	ACC2. Access to nearest secondary school	ACC3. How well served is the site by a bus	ACC4. How accessible is site to train Station	ACC5. Distance to GP service/ health centre	HO1. Will development meet housing need	NR1. Potential impacts on air quality	NR2. Remediation of contaminated land	NR3. Loss of High Quality Agricultural Land	NR4. Groundwater Source Protection Zone	NR5. Site within identified flood zone	RU3. Potential to safeguard/ sterilise minerals	BNH1. Proximity to designated heritage assets	BNH2. Effect upon heritage assets	BNH3. Capacity for landscape to accommodate	BG1. Impact on European Sites/ SPA/ SAC	BG2. Potential impact on a SSSI	BG3. Potential impact on Local Wildlife Site	BG4. Potential impact on TPOs	RU1. Use of previously developed land	RU2. Access to HWRC	
	1534	Land to the south of Lumber Lane	Burtonwood																												
	1654	Land bounded by Green Lane / Lumber Lane / Phipps Lane / Winsford Drive	Burtonwood																												
	R18/054 R18/P2/028	Land south of Lumber Lane, Burtonwood	Burtonwood																												
	2146	Land off Lumber Lane, Burtonwood	Burtonwood																												
	1656	Lumbers Lane / Forshaw's Lane / Phipps Lane	Burtonwood																												
	1800	Land Adjacent to Rose Villa	Burtonwood																												
	R18/080	Burtonwood Brewery and White House Farm	Burtonwood																												
	R18/149	Land adjacent to 131 & 133 Broad Lane	Burtonwood																												
	15231	Land off Lady Lane, Croft, Warrington	Croft																												
	1588	Heath House	Croft																												

Figure 3: SA Assessment

3.31 The SA confirms that the site is in a sustainable location and there are no constraints that could not be mitigated as part of a development scheme. This is reflected in the authority's assessment of draft allocation OS1.

Masterplan and technical considerations

3.32 A masterplan has already been prepared for the site by Baldwin Design and was submitted to the consultation on the Preferred Options document in 2017. A copy is appended at **EP3**.

3.33 The masterplan demonstrates that the site could deliver a high quality and sustainable extension to the existing built-up area of Burtonwood. It shows:

- A low-density scheme appropriate to the existing urban edge of Burtonwood with houses sited such that they positively address the public realm.
- The opportunity for extensive tree planting to the edges of the development site.
- Provision of extensive areas of on-site play and open space and retention of ecological features such as a pond.
- Desirable linkages for existing and future residents through the site and the retention of the existing public right of way along the southern boundary.

3.34 This masterplan would be revised in order to ensure an optimum relationship with proposed draft allocation OS1, which would adjoin the south western boundary of the site.

3.35 The primary access point into the site is shown off Lumber Lane to the northern boundary. SCP have produced a Transport Technical Note (appended to this statement at **EP4**), and this is summarised as follows:

- The site could accommodate up to 200 dwellings in highways terms with no unacceptable impacts,
- A single point of vehicular access would be sufficient to serve the site, although there are opportunities for a second access if required.
- There are opportunities for cycle and pedestrian linkages to Lumber Lane.
- The site is well connected to the urban area of Burtonwood and there is a convenience store, post office, primary school, nursery school, church, sports fields, hairdressers, hot food take-aways, and other shops and services, all within 1km of the site.
- There are two regular bus services within Burtonwood and further school and college buses. Service 141 connects Burtonwood to St Helens and Newton-le-Willows at a frequency of 60 minutes during the daytime. This service passes along the site frontage. Bus service 329 links St Helens to Warrington via Burtonwood and operates at a frequency of 30 minutes during the daytime.
- The development would provide a frontage along Lumber Lane that is more in-keeping with an urban speed limit and will assist in reinforcing the speed limit. There are no difficulties in terms of providing the requisite visibility splays.

3.36 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 OS1, as well as the individual assessment in the Options and Sites report and Site Assessment Proformas.

3.37 In access terms, it is clear that the site could deliver the proposed quantum of residential development as a standalone allocation. Further, it could provide a permeable access scheme with a potentially positive relationship to draft allocation OS1 (as recommended by the Warrington Borough Council highways assessment), as well as to the proposed access at Lumber Lane and other options along the south east boundary.

3.38 Furthermore, the Warrington Executive Board convened in March 2019 to discuss the Burtonwood Environmental Improvements Scheme (Items 13/16 on the agenda), and proposed

gateway features throughout the area. It is noteworthy that proposed measure '2A' is on Lumber Lane, adjacent to our site. This further highlights the site's excellent relationship with existing built form in Burtonwood. Allocation of our client's site would be an opportunity to assist with the delivery of the Environmental Improvements Scheme.

Deliverability

- 3.39 The site is available for development. Wainhomes (NW) Ltd is a national housebuilder based in Birchwood and is very active across the region with a proven track record in the delivery of new homes. Subject to the land being released from the Green Belt, the site could make a significant contribution to the deliverable 5-year supply of housing. Wainhomes are well placed in terms of increasing and diversifying the supply of housing through the Warrington Local Plan in a sustainable manner.
- 3.40 Our client's site is 'deliverable' in the short-term for new housing development, and is a highly logical location for the required additional residential allocations (fully set out in our overarching strategic representations prepared on behalf of Wainhomes), particularly in the context of its relationship with draft allocation OS1.

4. Local infrastructure

- 4.1 The site is adjacent to the existing built-up area of Burtonwood 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, health facilities, convenience stores and employment opportunities.
- 4.2 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.
- 4.3 This is supported by the proposed allocation of the adjacent land to the west through draft policy OS1, which confirms that the site is in a sustainable location with no major infrastructure constraints that would provide delivery of much needed residential development (including affordable housing for which there is an acute need) in the early stages of the plan.

5. Summary and conclusions

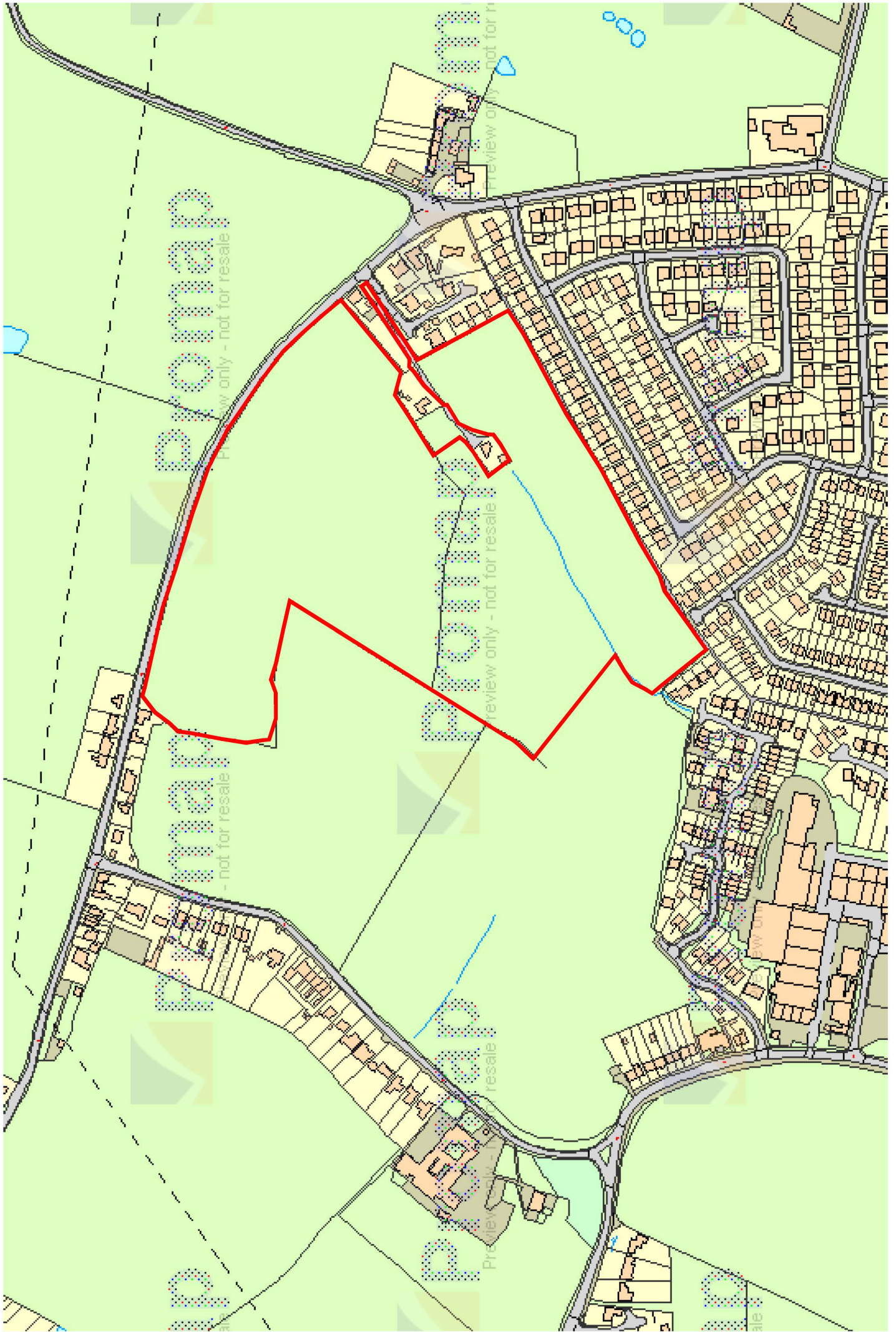
- 5.1 In summary, it is considered that draft allocation OS1 should be expanded to include all land between Lumber Lane and Green Lane, including our client's site, with identified land being removed from the Green Belt and allocated and/or safeguarded for residential development. Strategic representations submitted separately on behalf of Wainhomes confirm there is a need for additional sites, and it is considered that this entire land parcel could come forward as one allocation to help address this requirement.
- 5.2 This is supported by the Council's own assessments in the Site Assessment Proformas, particularly with regard to pedestrian access.
- 5.3 Our site-specific representations can be summarised as follows:
- The site makes a 'weak' contribution to the Green Belt, and the authority itself concludes that the wider parcel of land of assessment only makes a 'moderate' contribution (the least contribution of any sites in Burtonwood). This is further supported by the proposed allocation of site OS1, which further weakens the contribution made by a parcel that is essentially landlocked by strong urban features on all 4 boundaries.
 - The release of the land from the Green Belt for housing is fully justified in line with the requirements of the NPPF;
 - 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 OS1.
 - Wainhomes Developments Ltd is a national housebuilder based in Birchwood with a proven track record of delivery in the region – the site is 'deliverable' for new housing within the short-term and could make a meaningful contribution to the Borough's 5-year housing land supply position.

- 5.4 The allocation of the site would make an immediate contribution towards meeting the identified housing need in Warrington, and is a highly logical site for residential development, particularly in the context of proposed allocation OSI, the delivery of which would result in our site being bounded on all four sides by strong urban features.
- 5.5 At the very least, the site should be identified as safeguarded land in order to meet the long term needs of the Borough or to provide flexibility should Warrington fail to meet its housing requirement during this plan-period.

6. Appendices

- EP1. Site location plan
- EP2. Tyler Grange Green Belt Assessment
- EP3. Indicative Masterplan
- EP4. Transport Technical Note

EP1



EP2

- 1.1. This report has been prepared by Tyler Grange LLP on behalf of Wainhomes North West following desktop analysis and preliminary fieldwork undertaken in September 2017.
 - 1.2. The overview provides advice relating to landscape character and visual amenity at a high level to appraise the feasibility of the future residential development of land off Lumber Lane to the north of Burtonwood (hereafter referred to as 'the site').
 - 1.3. The overview report does not constitute a full Landscape and Visual Appraisal (LVA) / Landscape and Visual Impact Assessment (LVIA). It is intended that this work will inform potential development going forward and provide a review of the suitability of the land for release from the Green Belt.
 - 1.4. The report should be read alongside the following plans which are contained at the rear of this report:
 - (11151/P01);
 - (11151/P02);
 - (11151/P03);
-

*(See **Plan 1: Landscape Context Plan (11151/P01)**)*

- 2.1 A site walkover survey was conducted on the 19th of September to assess the landscape character and visual amenity of the site. The weather was sunny/cloudy with clear views. A desktop study using available data sources was undertaken including national and local landscape designations and policies.
- 2.2 Burtonwood is a small village and civil parish within the Warrington borough of Cheshire, in North West England. It is situated approximately 5.6 miles north west of Warrington, 4.6km west of the M6 and 1.5km north of M62. The civil parish also incorporates Westbrook, which is a council ward and suburb of Warrington.
- 2.3 The site is an approximately 10.1 hectare area of greenfield land, centred on OS grid reference SJ 56815 93391. There are three fields within the site divided by ditches lined with scrubby vegetation and isolated trees. The largest field to the north is approximately 5.5 hectares and

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is used as arable farmland, a central field of 2.5 hectares and a southern field of 2.1 are improved grassland. The site is adjacent to the residential edge of Burtonwood to the southeast. To the west are two other fields, separated from the site by a line of scrubby vegetation and trees. Beyond this to the west is Green Lane and an adjacent line of residential properties. Lumber Lane aligns to the northern site boundary, beyond which is agricultural land for approximately 1km up to the Sankey Brook and Sankey Canal.

The large flat fields create a generally open site, with some sense of enclosure created within the site by scrubby vegetation and trees. To the south and east the visual extents is defined by the residential edge of Burtonwood. To the west a number of suburban properties aligned to Green Lane create the visual extents. To the north longer distance views are available towards the riparian woodland aligned to the Sankey Brook and industrial buildings at the southern edge of Newton-le-Willows. The site is generally flat, sloping gently from a low point at the north of approximately 29m AOD to a high point in the south of 31m AOD.

-
- 3.1. Warrington Borough Council's Local Planning Framework currently consists of the Warrington Local Plan Strategy which was adopted on 21 July 2014. The Local Plan is being updated, in particular the housing policies, as part of this the Council is undertaking a review of the Green Belt to identify new land for development. The site is located wholly within the Green Belt and a review of the site's performance and suitability for release from the Green Belt is set out in this report.

Warrington Borough Council Local Plan Core Strategy (Adopted July 2014)

- Policy CS 1 Overall Spatial Strategy - Delivering Sustainable Development;
 - Policy CS 2 Overall Spatial Strategy - Quantity and Distribution of Development;
 - Policy CS 5 Overall Spatial Strategy - Green Belt;
 - Policy CS 6 Overall Spatial Strategy – Strategic Green Links;
 - Policy QE 3 Green Infrastructure;
 - Policy QE 6 Environment and Amenity Protection;
 - Policy QE 7 Ensuring a High-Quality Place; and
 - Policy CC 2 Protecting the Countryside.
- 3.2. The Overall Spatial Strategy policies focus on sustainable development, managing the quantity and distribution, housing supply, the Green Belt and strategic Green Links. In relation to the Green Belt, the Strategic Vision for Warrington notes that: *“The focus on regeneration has limited outward growth of the town and has enabled the continued protection of the Green Belt.”* This links into Strategic Objective W2: *“To maintain the permanence of the Green Belt and the character of the countryside in the borough and protect them from inappropriate development.”*
- 3.3. Policy CS 1 states that *“development proposals that are sustainable will be welcomed and approved without delay”*. The policy goes on to list the criteria by which development should accord with alongside national and local planning policy frameworks and the material considerations in order to be considered sustainable. Specific material considerations relevant to the site and proposed residential development include:
- *“Priority afforded to the protection of the Green Belt and the character of the countryside;*
 - *The need to address the causes of and be resilient to the effects of climate change;*
 - *The need to safeguard environmental standards and residential amenity;*

- *The delivery of high standards of design and construction, that have regard to local distinctiveness and efficiency; and*
 - *The need to make the best use of existing transport, utility, social and environmental infrastructure within existing settlements, and ensure additional provision where needed to support development.”*
- 3.4. Policy CS 2 relates to the quantity and distribution of development. Principles in the policy relevant to the site and residential development include:
- *“The general extent of the Green Belt and the detailed boundaries as indicated on the Local Plan Core Strategy Policies Map will be maintained for as long as can be seen ahead and at least until 2032;*
 - *Within the Green Belt area, development will only be allowed where it is considered to be appropriate in accordance with national policy; and*
 - *All new development should where appropriate make provision for supporting infrastructure in accordance with Policy MP10.”*
- 3.5. Policy CS 3 states that:
- “Should monitoring indicate that an on-going, 5 years’ deliverable and a subsequent 5 years’ supply of developable housing land can no longer be sustained or where it can be demonstrated that housing need cannot be met within Warrington, the Council will review its housing land provision, and bring on-stream additional housing sites as required, with priority given to encouraging the reuse of previously developed land and avoiding sites in the Green Belt where possible.”*
- 3.6. In relation to Policy CS 5, planning permission for new buildings in the Green Belt *“will be approved where they accord with relevant national policy.”* The site is being considered for release from the Green Belt for the purposes of residential development in the emerging Warrington Borough Council’s Green Belt Review.
- 3.7. Policy CS 6 relates to Green Infrastructure and states that the Council *“is committed to supporting wider programmes and initiatives which seek to connect the borough’s Strategic Green Links with employment areas, residential communities, and Green Infrastructure Assets”*. Further requirements in relation to Green Infrastructure are set out in Policy QE3 which provides more detail on the criteria against which applications will be assessed.
- 3.8. Policy QE 6 considers the protection of environment and amenity within development. Areas taken into consideration relevant to site and residential development include:
- *“The quality of water bodies, including canals, rivers, ponds and lakes;*
 - *Land quality;*
 - *Levels of light pollution and impacts on the night sky; and*
 - *The need to respect the living conditions of existing neighbouring residential occupiers and future occupiers of new housing schemes in relation to overlooking / loss of privacy, outlook, sunlight, daylight, overshadowing, noise and disturbance.”*
- 3.9. Policy QE 7 describes the Council’s expectations in term of the quality of place in relation to development. Proposals which have considered the following aspects will be positively received:

- *“Be sustainable, durable, adaptable and energy efficient; create inclusive, accessible and safe environments;*
 - *function well in relation to existing patterns of movement and activity;*
 - *reinforce local distinctiveness and enhance the character, appearance and function of the street scene, local area and wider townscape;*
 - *harmonise with the scale, proportions and materials of adjacent and / or existing buildings;*
 - *maintain and respect the landscape character and, where appropriate, distinctiveness of the surrounding countryside;*
 - *use the density and mix of development to optimise the potential of the site without damaging the character of the area; and*
 - *be visually attractive as a result of good architecture and the inclusion of appropriate public space.”*
- 3.10. The remaining applicable landscape and visual related policies deal with improvements to the Green Infrastructure of Warrington Borough the retention of landscape features and recreational public routes, including cycleways, as well as the requirement for built form to complement the materiality of the locality in order to preserve local distinctiveness and the local character features to ensure the suitable assimilation of development proposals. The policies also direct development towards achieving high quality design within new development, and providing landscaping as an integral part of the overall design.
- 3.11. Policy CC 1 covers Green Belt Settlements.
- “Within these settlements development proposals will be subject to Green Belt policies set out in national planning policy. New build development maybe appropriate where it can be demonstrated that the proposal constitutes limited infill development of an appropriate scale, design and character in that it constitutes a small break between existing development which has more affinity with the built form of the settlement as opposed to the openness of the Green Belt; unless the break contributes to the character of the settlement.”*
- 3.12. The contribution the site makes to the Green Belt in landscape and visual terms is covered further in _____ of this report.
- 3.13. Policy CC 2 supports development within the countryside provided that:
- *“the detailed siting and design of the development relates satisfactorily to its rural setting, in terms of its scale, layout and use of materials;*
 - *they respect local landscape character, both in terms of immediate impact, or from distant views;*
 - *unobtrusive provision can be made for any associated servicing and parking facilities or plant, equipment and storage;*
 - *they relate to local enterprise and farm diversification; and*
 - *it can be demonstrated that there would be no detrimental impact on agricultural interests.”*
- 3.14. The remaining applicable landscape and visual related policies deal with improvements to the Green Infrastructure of Warrington Borough the retention of landscape features and recreational public routes, including cycleways, as well as the requirement for built form to complement the materiality of the locality in order to preserve local distinctiveness and the local character features to ensure the suitable assimilation of development proposals. The policies also direct development towards achieving high quality design within new development, and providing landscaping as an integral part of the overall design.

- 3.15. In addition to the above policies, the following Supplementary Planning Documents (SPD) and Supplementary Planning Guidance (SPG) also need to be taken into consideration:

Supplementary Planning Documents

- 3.16. This SPD supports Policy QE6 Environment and Amenity Protection and details the councils approach to dealing with environmental protection including light pollution. Development schemes which include street lighting proposals should adhere to the design principles set out in the SPD. Principles relating to landscape and visual include:

- *“Limiting the light levels to a designed uniformity;*
- *limiting the use of lighting schemes to identified uses or users;*
- *the retention of screening vegetation; and*
- *the use of planting and bunding to contain lighting effects.*

- 3.17. The SPD states that *“these conditions will be applied as necessary by the LPA to help reduce obtrusive light from new proposals, particularly glare and spillage, from areas of wildlife importance, open countryside and residential amenity.”*

- 3.18. This document provides advice and guidance to developers about aspects of the design and construction process. The document states that *“A well designed landscape scheme should enhance the appearance and setting of any new development and its location. A successful scheme will have considered and correctly interpreted the landscape character of the location so as to produce the most appropriate design solution for the development.”*

- 3.19. This document is to provide advice and guidance to developers who are required to submit landscape schemes as part of detailed planning applications.

- 3.20. The key objectives are:

- *Ensure high quality environments in which to live and work through excellent landscape designs in new developments;*
- *ensure the design of new landscapes feature at an early stage in the design process to ensure they are well integrated into new developments;*
- *ensure biodiversity and geological features are conserved and enhanced through landscape improvements;*
- *promote the health and wellbeing of the community through new landscape schemes*
- *promote quality landscape schemes which are sensitive to the locality and provide local distinctiveness; and*
- *ensure that the design of new landscapes do not increase fear of crime or give rise to criminal behaviour.*

- 3.21. This policy details a number of key objectives for open space within the borough including:

- *“To ensure an adequate provision of open space in quantitative, qualitative and accessibility terms subsequently helping to ensure the creation of sustainable communities;*
- *to create opportunities for and enhance biodiversity;*
- *to create opportunities for travel by more sustainable modes such as by walking or cycling;*
- *to assist in maintaining and improving public health by providing opportunities for recreation and sport;*
- *to provide educational opportunities in the form of ‘outside classrooms’ through providing opportunities for contact with nature;*
- *to provide focal points for social interaction and community events;*
- *to contribute to local distinctiveness through helping to create a sense of place and belonging;*
- *to help secure safe and well-designed open spaces where the design has intended to deter crime; and*
- *to assist in tackling climate change through the plantation of trees and creation of green ‘breathing’ spaces.”*

3.22. This SPD details the councils approach to the use of planning obligations to facilitate decision making, relevant key objectives include:

- *“Ensure appropriate environmental and biodiversity protection and enhancement and mitigation measures where appropriate;*
- *Ensure no detrimental impacts on amenity (visual, residential, noise, flood risk, landscape);*
- *Ensure conservation of heritage assets and mitigation where appropriate.”*

3.23. A review of the site’s performance and suitability for release from the Green Belt is summarised below in relation to the applicable principal Green Belt objectives as set out within the NPPF (the Framework) from a landscape perspective and in relation to the findings of the Warrington Borough Council Green Belt Assessment.

3.24. The NPPF framework sets out five key purposes for green belt:

- *“to check the unrestricted sprawl of large built-up areas*
- *to prevent neighbouring towns merging into one another*
- *to assist in safeguarding the countryside from encroachment*
- *to preserve the setting and special character of historic towns*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”*

3.25. Stage 1 of The Warrington Borough Council Green Belt Assessment (WBCGBA) marked out 24 General Areas based on common features and characteristics. Each area was then assessed against the NPPF five key purposes of green belt marked out above. The proposed site lies within General Area 18. Stage 2 involves defining smaller green belt parcels around settlements focussing on technical site assessments of the areas, looking at site constraints. The proposed site lies within BW3.

3.26. The sites are reviewed within the context of the NPPF Green Belt objectives below:

- ***To check unrestricted sprawl***

The WBCGBA defined General Area 18 as making a moderate contribution towards this objective. At a more detailed level land parcel BW3 is considered to make no contribution towards checking unrestricted urban sprawl, with the reason being that it is not adjacent to the Warrington urban area.

To the southwest, the site is bordered by residential properties and gardens. To the north is Lumber Lane and to the east are two fields. Beyond fields to the east are Green Lane and a number of houses aligned to the road.

The residential garden boundaries which line the site to the southwest could be considered vulnerable to urban sprawl due to being rear facing. Lumber Lane creates a more rigid boundary to the north and could be utilised together with appropriate development frontages and soft landscaping, to restrict development from spreading beyond this point into open countryside to the north.

The western boundary is currently aligned by two fields. Beyond this is Green Lane and an associated line of suburban houses (c.150-250m from the site boundary dependant on latitude of measurement). Despite Green Lane not being directly adjacent to the site, the boundary acts to perceptually separate the site from the wider countryside and act as a limit to development. Further to this, buffer planting could be developed along the western site boundary which would create a more robust edge.

- ***To prevent neighbouring towns merging into one another***

General Area 18 is assessed to make a strong contribution towards this objective. At a more detailed level, land parcel BW3 is assessed within the WBCGBA to make a weak contribution to preventing towns merging into one another. It is assessed that this parcel forms a less essential gap between the Warrington urban area, Newton-le-Willows and St Helens. The assessment points out that whilst development in this area would reduce the actual gap to an extent, this would not reduce the perceived gap.

The site is located between Burtonwood, Newton-le-Willows, Bold and St Helens. The site's southwest boundary sits directly adjacent to Burtonwood. St Helens is c.2.2km northwest of the site, Bold is c.2km west of the site and Newton-le-Willows is c.1.35km north of the site. The distance between the development site and other surrounding settlements means this site can have little influence in preventing towns from merging.

Another consideration in terms of the merging of settlements, is the strength and permanence of existing boundaries. There are significant transport links and other boundaries that separate the afore mentioned urban areas from the site. Directly adjacent to the north of the site is Lumber Lane and beyond this Newton-le-Willows is separated by the Sankey Canal, Sankey Brook and an electricity transmission line. To the northwest, the railway line linking Newton-le-Willows to Liverpool and Manchester crosses between the site and St Helens. To the east Green lane, Back Lane and Bold Lane lie between Bold and the site, alongside industrial developments.

- ***Safeguarding the countryside from encroachment***

General Area 18 is deemed to make a moderate contribution to this green belt objective within the WBCGBA. At a more detailed level land parcel BW3 is deemed to make a strong

contribution towards safeguarding the countryside from encroachment. The boundary between BW3 and Burtonwood is assessed as being non-durable, consisting of fenced/hedged garden boundaries, and therefore unable to prevent encroachment into this parcel long term. The assessment highlights that Green Lane and Lumber Lane create durable boundaries between the site and the wider countryside.

A relationship to Burtonwood is created through views available to residential properties at the southeast of the site as acknowledged by the WBCGBA. A relationship to a more rural character is created through views of countryside to the north and to two fields adjacent to the site to the west. The view north incorporates a line of pylons and larger transmission towers detracting from the countryside view.

The Warrington Landscape Character Assessment suggests key objectives for managing LCA 1E: Burtonwood are to reduce the negative views of pylons and to consider additional planting as an envelope to the village of Burtonwood. An attractively designed development could help to screen pylons for views looking north from Burtonwood, improving countryside views from these locations. Native planting around the edge of the development could assist in contribute to an attractive planted envelope at the settlement edge and further strengthen this boundary as robust to countryside encroachment.

As highlighted in the WBCGBA, whilst there is a connection to two fields adjacent to the site at the east, the site is separated from the wider countryside by Lumber Lane and Green Lane. The most vulnerable boundary to countryside encroachment in a developed site would be to these two fields to the west. Whilst there is some scrubby vegetation and trees which separate the site from these fields, this boundary could also be strengthened with a landscape buffer extending across the full eastern boundary. This would provide the opportunity to create a more characteristic settlement edge than exists at the northern edge of Burtonwood at present, and would enable a robust, defensible and permanent settlement edge to be created. Ultimately, Lumber Lane and Green Lane provide the most appropriate defensible edges to restrict encroachment into the countryside in this location and development of the site would be contained within the limits of these features.

- ***Preserve the setting and special character of historic towns***

General Area 18 is assessed within the WBCGBA as making a weak contribution towards preserving the setting and special character of historic towns and land parcel BW3 is assessed to make no contribution to this green belt objective. The assessment states that the parcel is not adjacent to a historic town and does not cross an important viewpoint of the parish church.

The site sits at the northwest edge of Burtonwood, lined with predominantly bungalow style housing. There is currently no conservation area status in Burtonwood suggesting the character of the town is not valued for its historic setting.

Towards the northeast is the grade II listed Bradlegh Old Hall, which sits in the visual envelope of the proposed development site. Hedgerows would be expected to filter views towards the site, which are also viewed in the context of other properties aligning Lumber Lane. Sensitive landscape design along the northern boundary of the site could create a village edge feel, creating attractive views to the site from the north.

Long distance views from the site are available to the grade I listed Sankey Viaduct and to the spire of the grade II listed church of St Mary and St John. Development at this site

would be expected to have little impact on the setting of these heritage assets due to the distance at which it would be viewed together with the presence of intervening vegetation.

3.27. At the national level, the majority of the site sits within the 'Mersey Valley' Character Area (National Character Area 60). A small section of the north-west corner of the site is within Lancashire Coal Measures (National Character Area 56). At a local level, the site is identified within LCT 1: Undulating Enclosed Farmland and LCA 1E: Burtonwood as part of the Warrington Landscape Character Assessment.

3.28. Key characteristics of LCA 1E are noted as:

- *Exposed, open, large scale, arable fields*
- *Good views to the east*
- *Absence of, or highly-fragmented, hedgerows between fields*
- *Change of landscape character immediately around the fringes of Burtonwood village due to horse grazing and suburban landscape*
- *Noticeable appearance of pylons and telegraph poles*
- *Dominant presence of the well-wooded Nine Arches embankment north-west of Burtonwood village and through the middle of Collins Green*
- *Interesting, more varied, topography of Phipp's Brook valley*

3.29 Key elements of landscape sensitivity are:

- *Location of the village on crest line*
- *Open landscape with sparsity of hedgerows and hedgerow trees*
- *Exposed to views and weather*

3.30 Key objectives for managing this landscape character area are:

- *Restore and enhance remaining field patterns by additional hedgerow planting*
- *Reintroduce hedgerow trees to the hedgerows to create shelter*
- *Consider additional native planting as an envelope to the village of Burtonwood*
- *Consider a visual impact study to reduce the negative views of pylons*
- *Encourage traditional hedgerow management and protection within horse grazing paddocks*
- *Retain open views towards Sankey Viaduct, together with selected longer views to the east and south*
- *Consider stream associated native trees and shrubs to Phipps Brook through farmland to the confluence with Sankey Brook*
- *Consider removal of privet hedges where possible and replacement with hawthorn, holly, etc.*

3.31. Whilst the character information set out above does provide some context relevant to the promotion of the site, it does not address the characteristics specific to the site. In response to fieldwork and desktop research, further observations have been made with regards the site and its immediate surroundings:

- The site is comprised of three fields of improved grassland and one containing arable crops. The fields are divided by ditches lined with scrubby vegetation and isolated trees.
- The site is bounded by vegetation to the west, Lumber Lane to the north and residential properties on the edge of Burtonwood to the east and south.
- The site is generally flat, the gradient falls approximately 2m from south to north.
- The visual envelope is created by the settlement edge of Burtonwood to the south and east, residential properties which line Green Lane in the west and longer distance views to the north including vegetation associated with Sankey Brook and the Liverpool-Manchester railway line.

3.32. It is evident from fieldwork, that the site has a high degree of openness, particularly towards countryside to the north, however the site's character is defined through a combination of more urban and rural characteristics due to the surrounding context. Urban factors making up the site's landscape character include the settlement edge of Burtonwood, properties aligning Green Lane, the adjoining road (Lumber Lane), electricity pylons which run north-south through the site and transmission towers running east-west past the north of the site. These all affect the degree to which the site can be considered rural, and whilst intervisibility with the wider Green belt is possible, the site itself is recognised in character terms as being more associated with the settlement edge than the wider countryside beyond Lumber Lane and Green Lane.

(See **Landscape Context Plan** (11193/P01) and **Photoviewpoints** (11193/P03))

3.33. The site is broadly open due to its current usage. Views within the site are broken up by scrubby vegetation and woodland lining two ditches which run through the site, dividing the area into three fields. Residential properties at the edge of Burtonwood to the east and south are visible from within the site. Bungalows and ground floors are less visible behind a solid concrete panel fence which lies at the site boundary. There are views to two other fields towards the west beyond which is a line of properties adjacent to Green Lane. More long-distance views are available to the north across open countryside extending out to vegetation associated with the Sankey Brook and vegetation aligned to a railway line linking Newton-le-Willows to Liverpool and Manchester. Buildings in an industrial estate at the southern edge of Newton le Willows are also visible from within the site.

3.34. The approximate extent of the visual envelope (VE) is set out below:

- To the north - views are open across countryside extending approximately 1km out to riparian woodland associated with the Sankey Brook and trees aligned to a railway line linking Newton-le-Willows to Liverpool and Manchester. Buildings in an industrial estate at the southern edge of Newton le Willows are also visible. Some heritage assets are visible including the grade I listed Sankey Viaduct, a spire of the grade II listed Saint Mary's and St. John's Church and the grade II listed Bradlegh Hall.
- To the south-east and east - a mixture of bungalows and two storey properties at the edge of the settlement of Burtonwood create the visual extents. A concrete panel fence creates a solid visual barrier at ground floor level.
- To the south-west and west - two fields are separated from the site by scrubby vegetation and a line of trees. Beyond the fields is Green Lane. To the west of Green Lane is a line of properties, which create the visual extents. There is a row of houses to the north east of Phipps Lane that are visible from the site, beyond these properties landform and vegetation obscures views.

- 3.35. Overall, the site is visible from properties to the west, south and east and these properties form the visual extents containing the site from wider visibility. Views towards the north are longer distance and extend towards vegetation associated with the Sankey Brook and Manchester-Liverpool railway line. Characteristic features are visible including the Sankey Viaduct, the spire of St Mary's and St John's church and Bradlegh old Hall. Detracting elements also feature within views and include electricity transmission towers and the Newton-le-Willows industrial estate. The drains within the site and associated scrubby vegetation create some sense of enclosure to the large flat fields within the site. Views do not extend into Burtonwood beyond the adjacent settlement edge.
- 3.36. Potential visual receptors to development of the site include:
- Users of the Public Rights of Way-footpath Burtonwood 30 aligned to the south-east site boundary, and footpath Burtonwood 33 to the north of the site.
 - Private residents associated with the adjacent residential edge of Burtonwood to the southeast and south, residential receptors of properties aligned to Green Lane, residential receptors aligned to Phipps Lane, residential receptors aligned to Lumber Lane, residential receptors of the Grade II* listed Bradlegh Old Hall and residential receptors of New Bradley Hall Farm in the north east.
 - Mill Farm Cottage is connected by a private access track to Lumber Lane, other than this connecting access track it is surrounded by the site on all sides.
 - Highway views from vehicular users of surrounding roads including Lumber Lane, Melrose Avenue, Aldridge Drive, Winsford Drive, Green Lane and Hall Lane.
- 3.37. The above is not an extensive list of all Public Rights of Way within the local area but lists those where users would be likely to experience discernible change. Further Public Rights of Way are shown on the Landscape Context Plan 11151/P01.
- 3.38. Due to the relationship between the site and surrounding infrastructure, vegetation and settlement edge, the site appears separate visually from the wider Green Belt, despite the site's location on the settlement edge. There are opportunities to utilise and develop the screening provided by the framework of green infrastructure present at the site boundaries to develop the site sensitively in a way which does not impact upon the perceived openness of the wider Green Belt landscape. There are further opportunities to improve the landscape quality of the site in line with the management guidelines for this landscape character area.
- 3.39. A key consideration in terms of visual impact will be the visual amenity of the users of the Public Right of Way along the south-eastern boundary and residents at close proximity to the site. Their amenity will need to be respected through appropriate development offsets and to ensure existing screening vegetation is retained and built upon where appropriate to ensure the new development is not overbearing.
- 3.40. In response to the desktop and fieldwork undertaken, the following conclusions and recommendations are presented:
- The existing character of the site is somewhat open and agricultural in nature, Lumber Lane and Green Lane act as development boundaries to separate this parcel of land from the wider countryside and Green Belt;

- Views are available to countryside in the north, though at some locations within the site these views will be filtered by trees and vegetation and will be seen in the context of transmission towers passing east to west. A planted envelope around the northern boundary of the site would screen views to transmission towers and create a characteristic vegetated boundary to Burtonwood, meeting management guidelines set out in the Warrington Landscape Character Assessment. This would also contribute towards the strengthening of the northern edge of the site as a new Green Belt boundary;
- In terms of boundaries, the northern boundary of Lumber Lane is strong in Green Belt terms, although it could be strengthened with appropriate development offsets and soft landscaping to limit the visual influence of new development over the land to the north. The western and south-western boundaries are aligned to the existing settlement edge of Burtonwood. There is an opportunity to strengthen the western boundary utilising new soft landscaping to create a strong landscape buffer which could contain development visually and ensure the settlement edge does not encroach onto the adjoining agricultural land, Ultimately, development along Green Lane provides the most defensible edge to encroachment within the context of the site;
- In terms of receptors to change as a result of development, the main visual receptors will be users of the footpath along the south-eastern boundary and residential properties in close proximity to the site also to the south and south-east. The visual amenity of these receptors should be carefully considered in the development of the site through the incorporation of appropriate development offsets and new soft landscaping, in particular to ensure the visual amenity of users of the footpath adjoining the site are respected;
- As set out within this note, the existing settlement edge to the south-east has a visual and perceptible influence over the character of the site, and is not robust as a green belt boundary to restrict urban sprawl or encroachment as properties are rear facing over the adjoining landscape, with built form not filtered by any vegetation. This could be addressed within any future development proposals for the site through the strengthening of the existing vegetation as well as the incorporation of development offsets, layout considerations and landscape buffers to create a more defensible settlement edge; and
- Development of the site would be unlikely to affect the integrity of the wider Green Belt beyond the extent to which the existing settlement edge and detracting features within the landscape do; indeed, the site presents an opportunity to create a more appropriate and robust settlement edge, which is defensible to additional sprawl in the future, as well as to reduce the extent to which built form influences the wider open countryside and remaining Green Belt north of Lumber Lane and west of Green Lane.

3.41. Whilst it is appreciated that only a broad level assessment has been undertaken, this technical note has demonstrated that residential development within the site could be accommodated with reference to the site-specific conditions.

3.42. The site is considered capable of being developed without resulting in unrestricted urban sprawl or coalescence of urban areas. Although the site is currently somewhat open as an unused pastoral field, urban influences are present in the form of views towards the adjacent residential edge of Burtonwood and the presence of transmission towers and pylons in the locality.









3.43. The most likely adverse effects are deemed to relate to the change in views for users of the public footpath running alongside the south-eastern site boundary and for users of residential properties along the adjacent urban edge. These will need to be sensitively considered as part of future design proposals for the site, with development offsets, the consideration of appropriate screen planting and the provision of new soft landscaping.

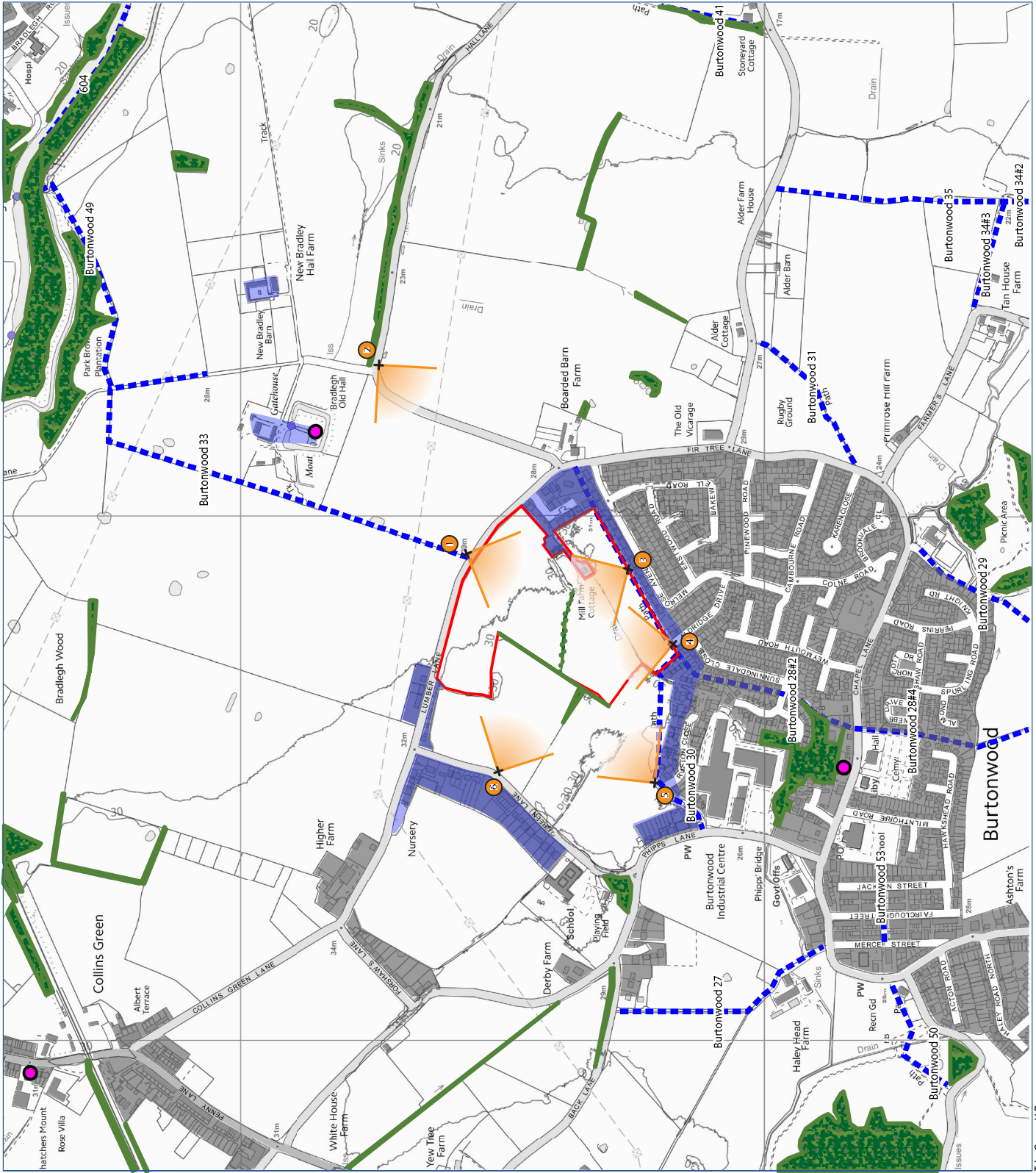
- 3.44. With the above conclusions taken into account and with respect to landscape and visual matters, this site should therefore be considered suitable for residential development and release from the Green Belt.

Landscape Context Plan (11151/P01)

Opportunities and Constraints Plan (11151/P02)











Photoviewpoints 1-6 (11151/P03)

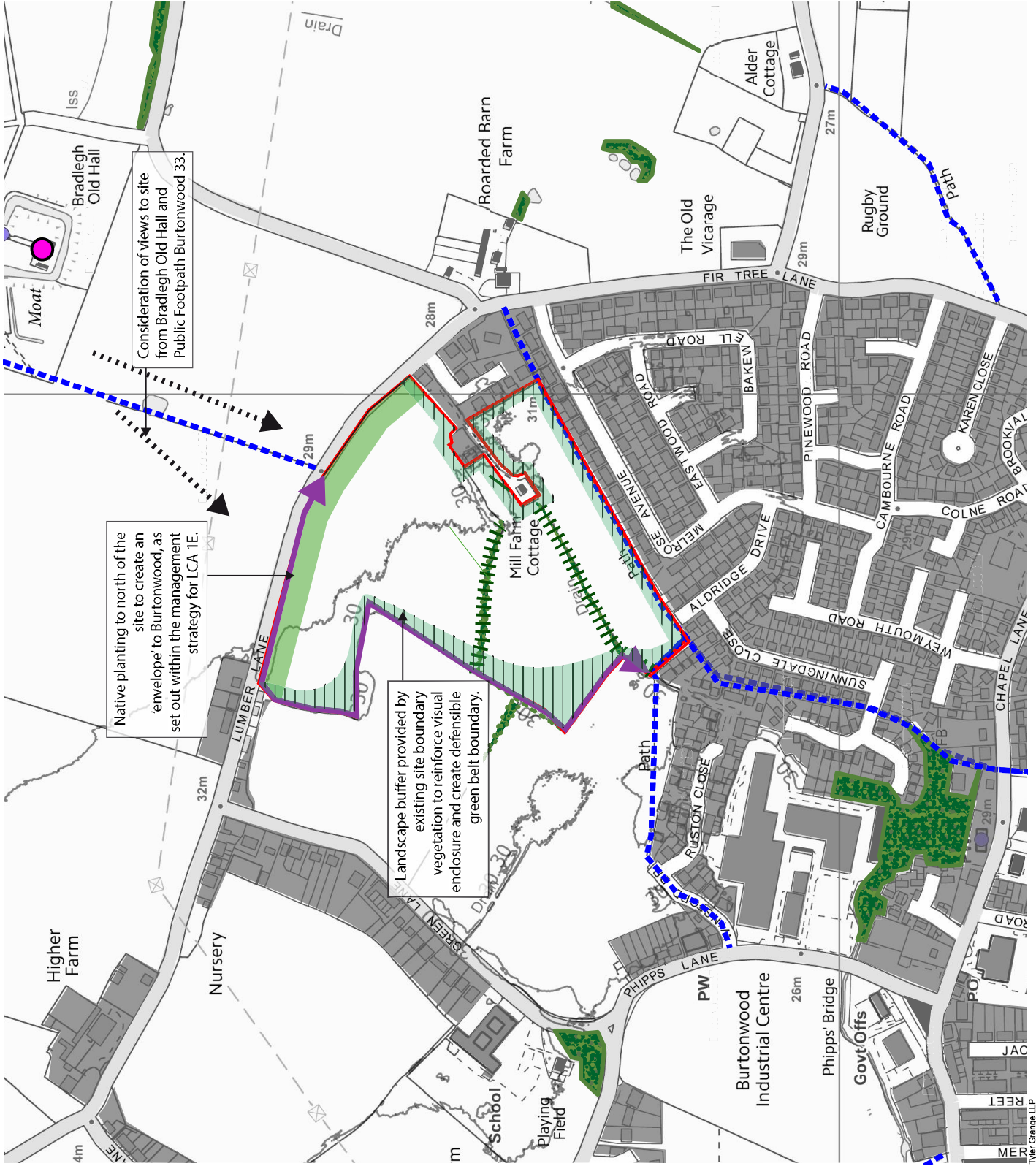
-  Site Boundary
-  Dwellings with Primary Views of the Site
-  Built Areas
-  Existing Woodland
-  Photoviewpoint Locations
-  Public Rights of Way
-  Listed Buildings
-  Contours



Project Lumber Lane, Burtonwood, Warrington
 Drawing Title Landscape Context Plan and Photoviewpoint Locations
 Scale 1:7,500 @ A3
 Drawing No. 11193/P01
 Date September 2017
 Checked HTMC



-  Site Boundary
-  Built Areas
-  Existing Woodland
-  Public Rights of Way
-  Grade II listed Bradlegh Old Hall
-  Green Envelope to Burtonwood
-  Landscape Buffer
-  Enhance Existing Vegetation in Site
-  Views to be Filtered
-  Potential recreational route to connect PRow



Project
Lumber Lane, Burtonwood,
Warrington

Drawing Title
**Landscape Opportunities
and Constraints**

Scale
As Shown (Approximate)

Drawing No.
11193/P02

Date
September 2017

Checked
HCTMC



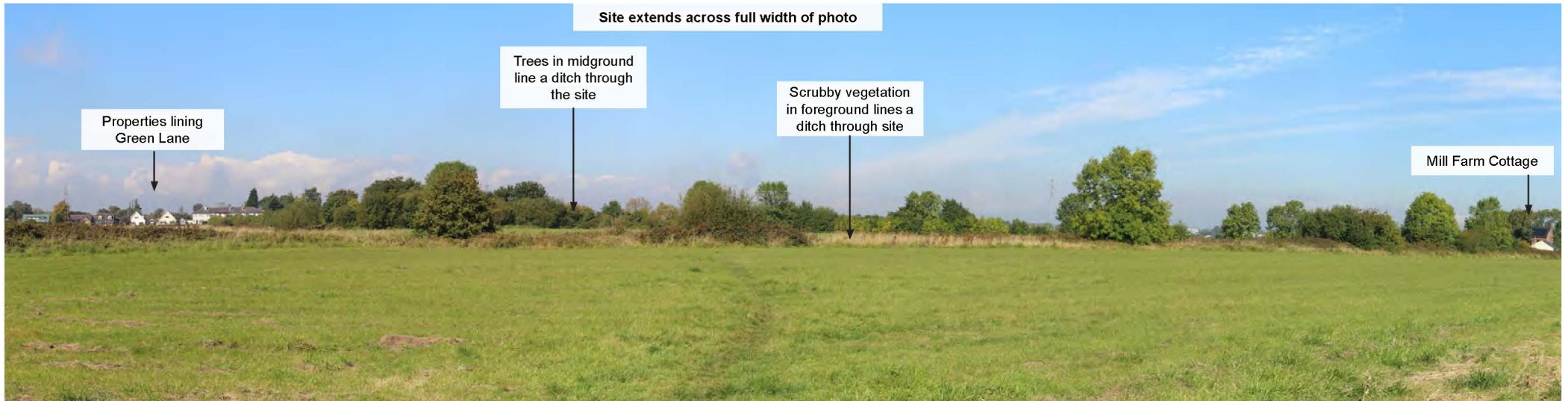
Photoviewpoint 1: View from Lumber Lane looking south



Photoviewpoint 2: View from Hall Lane near Bradlegh Old Hall looking south-west



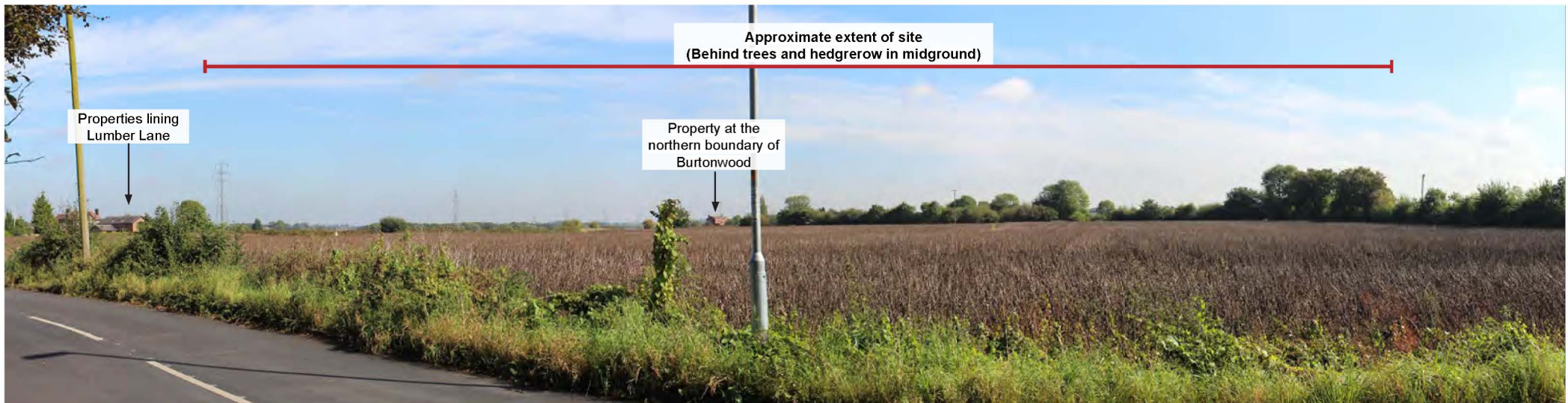
Photoviewpoint 3: View from footpath Burtonwood 28 looking west



Photoviewpoint 4: View from footpath 28 looking north



Photoviewpoint 5: View from public footpath Burtonwood 30 looking north east



Photoviewpoint 6: View from Green Lane looking east

EP3



Local Plan Representations

Representations to the Warrington Local Plan Submission
Version (Draft Policy MD3) – Land at Runcorn Road,
Warrington

for Wainhomes (North West) Ltd

Emery Planning project number: 18-098

Project : 18-098
Site address : Land at Runcorn Road,
Warrington
Client : Wainhomes (North West)
Ltd

Date : 17 June 2019
Author : Shaun Gaffey

Approved by : John Coxon / Stephen
Harris

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

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Emery Planning Partnership Limited
trading as Emery Planning.

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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 Wainhomes (North West) Limited, who have an option on the land edged red (hereby referred to as 'the site') as set out in the location plan appended to this statement at **EP1**.

1.2 These representations propose 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 removal from proposed draft allocation MD3 (South West Urban Extension) is not justified. The site should form part of the allocation. Alternatively, if allocation MD3 is deleted from the plan, the site could be allocated as a sustainable extension to the village of Moore.
- The site makes a weak contribution to the purposes of the Green Belt; particularly in the context of proposed allocation MD3 on adjacent land to the east.
- The site is deliverable for residential development and could make an immediate contribution to the delivery of required housing in the borough; including affordable housing, for which there is an acute need.
- If the site is not allocated, it should be designated as safeguarded land at the very least, in order to provide flexibility should other proposed allocations fail to deliver, or for housing beyond the plan period.

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 adjacent to the eastern boundaries of our client's site. The narrow, disused railway elements of the site are included within the proposed allocation. Full details of the site are provided in section 3 of this report.

2.2 In summary, it is considered that the allocation should be expanded to include all elements of our site, as per the proposed draft allocation in the Preferred Options local plan consulted upon in 2017:



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

2.3 Our client's land interest forms the majority of proposed residential allocations A1, A2 and A6 as set out in the Warrington South West Urban Extension Framework Plan Document (June 2017) above. 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:

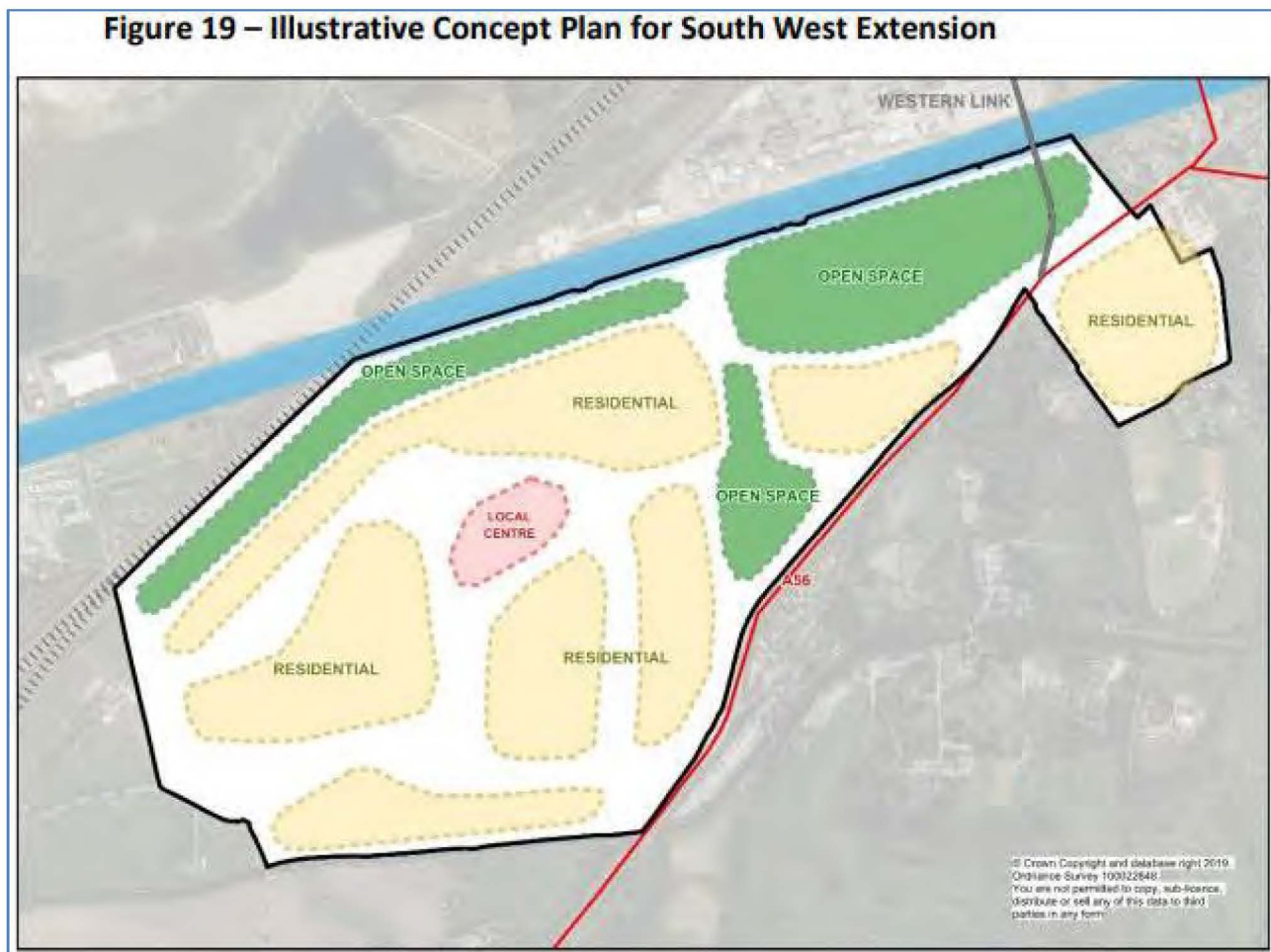


Figure 2: Proposed Submission Version SW Extension (2019)

2.4 The Council has published responses from neighbouring authorities under the Duty to Cooperate. Halton Council's comments to the proposed South West extension (as set out in the evidence base document 'Record F – Local Plan-Prescribed Bodies' Responses – ('duty to cooperate')) are as follows:-

South West Urban Extension (SWUE)

6.1. Halton wishes to object to the proposed South West Urban Extension (SWUE) as currently proposed and looks forward to working with Warrington to investigate options for retaining a satisfactory Green Belt gap (physical and perceived) between the towns of Runcorn and Warrington. Halton wishes to raise concerns regarding;

(4) Green Belt - Merging of settlements

(5) Evidence Base - Green Belt Study (6) Evidence Base - Highways & Access

(7) Bridgewater Canal Marina

a) Green Belt – Merging of settlements

6.2. For GA14 (SWUE) Warrington's Green Belt Study concludes;

"Moderate contribution: The GA forms a largely essential gap between the Warrington urban area and Runcorn in the adjacent neighbouring authority of Halton, whereby a reduction in the gap would significantly reduce the actual distance between the towns but would not result in them merging. Overall the GA makes a moderate contribution to preventing towns from merging."

6.3. Halton disagrees with this assessment / conclusion. It seems clear Warrington's consultants have had regard to the remaining distance of the adopted Green Belt to Runcorn, apparently ignoring the presence of Moore Village and the ribbon development creating a near unbroken line of development from Sandymoor, through Moore, Warrington's South West Urban Extension, to Walton, Stockton Heath and Grappenhall. Warrington's proposal as drafted would essentially lead to constant development along the Ship Canal from the Weaver Navigation to the Thelwall Ferry.

6.4. These conclusions / outcome are regardless of any proposals Halton may produce for land around Moore village in its own emerging Local Plan.

b) Evidence Base –Green Belt Study Parcel WR65.

6.5. This very large parcel is transected by a watercourse (a potential strong green belt boundary) running north south through the middle of the site which would suggest this site should have been dealt with as two separate parcels."

2.5 The Options and Site Assessment Technical Report provides further justification for the amendments to the proposed SW Extension boundary, stating that:

"Additional work to confirm the South West Urban Extension Allocation

3.26 The Council has met with Halton Council under the Duty to Cooperate to discuss their concerns with the extent of the South West Extension in relation to Moore Village and in respect of the proposed allocations in their own emerging Local Plan.

3.27 The two Councils have agreed to ensure appropriate separation in considering proposed Green Belt release adjacent to the boundary between the two boroughs. This is reflected in the Council's draft Statement of Common Ground. The Council has therefore reduced the western extent of the South West Extension to provide this separation. The allocation policy also provides specific protection to the area of land between the allocation and

Moore village as a Green Gap in addition to it remaining within the Green Belt.

3.28 WBC will continue to work with Halton Borough Council as the respective Local Plans progress.

3.29 The Council has engaged with developers with land within the South West Extension and with infrastructure providers to confirm the required infrastructure to support the allocation and to demonstrate that the allocation as a whole is viable and can be delivered.

3.30 The Council also engaged with Natural England and the Environment Agency to address ecological and environmental issues.

3.31 A Heritage Impact Assessment has been prepared for the South West Urban Extension, in liaison with Historic England, which has informed the Local Plan allocation policy"

- 2.6 In summary, we object to the removal of our client's site from proposed draft allocation MD3, and consider it should be removed from the Green Belt and allocated and/or safeguarded for residential development as part of MD3 going forward. Strategic representations submitted separately on behalf of Wainhomes confirm there is a need for additional residential allocations, and it is considered that this site could come forward (as originally intended by the authority in 2017) to help address this requirement.
- 2.7 As set out below, the Council's Green Belt Assessment concluded that wider parcel 'General Area 14', of which our site forms part, makes a 'moderate' contribution to the purposes of the Green Belt in this location. The site was also specifically assessed (ref: R18/005) and was considered to make a 'moderate' contribution. Further, smaller parcels WR65 and WR66 (both partly adjacent to our site) made 'moderate' and 'weak' contributions respectively. Allocation MD3 proposes the delivery of adjacent land to the east of the site for mixed use development.
- 2.8 The allocation of this land in the Regulation 18 version of the plan further confirms the suitability of our client's site, which has a virtually identical relationship with land included within MD3, in that it has strong, defensible urban features of existing residential development to the west; as well as the strong barrier of the railway line to the north. Should the allocation proposed in MD3 come forward, the site would also have built development on adjacent land to the east.
- 2.9 In this context, the site is clearly a logical rounding off of existing (and proposed through MD3) development, and makes an even weaker contribution to openness and the main purposes of

the Green Belt. As drafted the allocation would not result in a clearly defined Green Belt boundary, contrary to paragraph 139 (f) of The Framework.

2.10 Excluding our client's site from draft allocation MD3 would not materially preserve the physical gap given the scale of the remainder of the allocation, and would make no contribution to preserving the *perception* of openness in this location. If Warrington Borough Council agrees with Halton Council's assessment of MD3, it is considered that a significant portion of the western part of the site (which would provide the most development given the severe constraints associated with the north east element of the proposed allocation) should remain as Green Belt land, which presumably would jeopardise the delivery of proposed infrastructure improvements.

2.11 Paragraph 30 of draft policy MD3 states that:

"30. The western boundary of the site, comprising the Bridgewater Canal, Holly Hedge Lane and Bellhouse Lane defines the Green Belt boundary.

31. The Green Belt between the urban extension and Moore village will also be protected as a Strategic Gap to maintain the separate identify Moore village.

32. Development at the western extent of the site will be required to respect the Green Belt boundary and contribute to maintaining the Strategic Gap between the urban extension and Moore village."

2.12 Paragraph 10.3.16 of the policy justification states that:

"It is also important that the area of Green Belt between the western extent of the urban area and Moore Village is protected as a Strategic Gap to ensure the separate identify of Moore Village. It is understood that Halton are making amendments to the Green Belt boundary in this area and their Local Plan policies will replicate Warrington's commitment to maintaining a Strategic Gap in this location."

2.13 We object to the proposed western boundary of the allocation on the basis that our client's site does not make a significant contribution to the Green Belt in this location, particularly in the context of proposed MD3. It is not necessary to keep the land permanently open and it would not form a Green Belt boundary which is defensible in the long term.

2.14 The land in question contains a significant amount of previously developed land and a number of existing buildings, and subsequently does not provide a clear break between the proposed

allocation and Moore Village in any case. Linear development already extends from Moore along Runcorn Road, and the true strategic gap between Warrington and Runcorn is provided by open land to the south, between Runcorn Road and the A56. The allocation of our client's land would not materially impact on this gap, and as set out above, the retention of such a narrow tract of land as Green Belt would not preserve openness or indeed the perception of openness in this location, or make any material contribution to the separation of Warrington and Runcorn

2.15 Paragraph 10.3.12 of the policy justification for MD3 states that:

"The urban extension is of a sufficient scale to provide a range of services to support a new residential community in this part of Warrington, including a local centre, primary school, health facility and a network of open spaces. Its location will also ensure good access to Stockton Heath District Centre, Warrington Town Centre, the major development at Warrington Waterfront and other major existing and proposed employment areas, including Daresbury."

2.16 All of the above applies to our client's site, and is confirmed by the site's original allocation as part of the proposed SW Extension as set out in the 2017 consultation document and supporting evidence base. However, we would question whether the full scale of infrastructure can be achieved without the inclusion of our client's site, which is a very unconstrained parcel.

2.17 Wainhomes are an active developer with an excellent track record of delivering high quality residential development throughout the North West of England. Delivery of the site would provide high quality residential development, including affordable housing for which there is an acute need throughout the borough.

2.18 Further, there are similarly no technical constraints (fully discussed in section 3 of this statement) that would prevent the site from delivering residential development.

2.19 As set out above, separate strategic representations are also submitted to this consultation on behalf of Wainhomes. In summary, it is considered that the authority has not allocated enough residential sites to meet its requirement over the plan period. Subsequently, additional sites must be allocated to provide the required numbers as well as providing flexibility in the supply should other proposed allocations fail to deliver at the anticipated rates. Therefore, the proposed reduction in scale of MD3 to exclude our client's land is not considered to be justified in in this context.

- 2.20 It is considered that our client's site should come forward as part of a wider allocation under MD3. Wainhomes has an excellent track record of working with other developers to deliver large-scale, coherent residential allocations and would be open to collaborating on a wider masterplan that would deliver a logical extension to the south west of Warrington, with strong defensible boundaries on all sides that would minimise any impacts on the purposes of the wider Green Belt in this location.
- 2.21 On this basis, it is considered that the site should be allocated for residential development as part of the allocation MD3. However, should it be found that allocation MD3 is not sound, we propose that our client's site could be allocated as an extension to the village of Moore. The site could deliver residential development in the first five years of the plan as a standalone allocation. There are no constraints with access or ownership, and the site could make an immediate contribution towards delivering the required housing in Warrington.
- 2.22 Finally, the land within our client's ownership that does form part of the proposed allocation (i.e. the two relatively narrow parcels of land as shown on the appended location plan) is partly previously developed land that could be delivered as residential development within the proposed allocation. These could be delivered as part of wider MD3, in tandem with other parcels within the allocation. However, it is considered that the optimum solution both for our client and the wider aims of the SW Extension would be to re-allocate the larger parcels as per the 2017 version of the plan, and develop the narrower parcels of land as a mix of residential development and open space.
- 2.23 Without prejudice to our view that the site should be allocated, we propose that it could be safeguarded for future residential development, either beyond the plan period or in the event of a failure in delivering the required housing numbers during the plan. Moore Lane and Runcorn Road are logical boundaries that would ensure the allocation of land for much needed residential development, without unacceptably encroaching into the wider Green Belt in this location.

3. Land at Runcorn Road, Moore

Site location and description

- 3.1 Our client's land interest comprises four separate parcels of land with a total site area of 12.93ha.
- 3.2 The site is located partly within and partly adjacent to proposed draft allocation MD3 (South West Extension). It comprises a mix of fields and previously developed land (including buildings/structures). It falls within the control of Wainhomes. A location plan is appended at **EP1**.
- 3.3 The two larger western parcels are separated by Runcorn Road. Both parcels are well enclosed by strong, defensible boundaries, including the active railway line to the north, a ribbon of residential development to the west and by the canal to the south. The eastern boundaries of the parcels would adjoin draft allocation MD3. Consequently, the site would be surrounded by permanent built development.
- 3.4 The smaller, narrower parcels are currently proposed as being within draft allocation MD3. They are comprised of wooded areas and a dismantled railway line. The parcels are bounded by the active railway line to the north and by undeveloped land to the south and east (to be developed as part of MD3).
- 3.5 We have not previously made representations with regard to this site through the Warrington Local Plan Regulation 18 Consultation (December 2016), and the Preferred Development Option (2017). However, we made internal submissions after the consultation following Wainhomes acquiring an interest in the site, and met with the Council's planning policy officer. A review of consultation responses shows representations were made to the original call for sites exercise and the two western parcels were identified as SHLAA site R18/005.
- 3.6 The site has not been assessed 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 (2016) as part of wider parcel 14 and specifically as site R18/005. It was not assessed in the 2018 Green Belt assessments. Reference is made to assessments of adjoining land, where appropriate.

Green Belt Considerations

3.7 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 meet unmet and future housing needs of Warrington and the wider Borough. This comprises exceptional circumstances for the purposes of the NPPF, and is accepted by the authority.

3.8 Our client's site was assessed through wider parcel 14 through the Warrington Green Belt Assessment (2016). No update to this assessment is provided in the evidence base for this consultation. The assessment of parcel 14 concluded that:

"The GA makes a strong contribution to one purpose, a moderate contribution to three and no contribution to one. Professional judgement has been applied and the GA has therefore been judged to make a moderate overall contribution to the Green Belt. The GA supports a strong degree of openness with minimal development and the boundaries between the GA and the open countryside are unlikely to be able to prevent encroachment. However, the GA has a limited connection to the built up area and development would not result in the merging of the Warrington urban area and Runcorn."

3.9 We largely agree with this assessment, but provide our own detailed analysis below.

3.10 The site was also specifically assessed in the Council's 2016 Green Belt Assessment and was identified as site R18/005. The assessment concludes that the site (the assessment is predominantly based on the southernmost of the western parcels) makes a 'moderate' contribution to Green Belt purposes, stating that:

"The site makes a strong contribution to one purpose [safeguarding from encroachment], a moderate contribution to one purpose [assisting in urban regeneration], a weak contribution [merging of settlements] to one purpose and no contribution to two purposes. In line with the methodology, professional judgement has been applied and the site has been judged to make a moderate overall contribution. Whilst the site supports a strong degree of openness and there is a nondurable boundary with the washed over village of Moore, it has predominantly durable boundaries the open countryside. The site makes no contribution to preventing sprawl and preserving historic towns. It makes a weak contribution to preventing towns from merging."

3.11 We largely agree with this assessment. However, to further demonstrate that the site is suitable for removal from the Green Belt, we provide our own assessment of performance against the first four of the key purposes of the Green Belt as set out at paragraph 134 of the NPPF. The fifth

was not assessed as the need for Green Belt releases is accepted by the authority. The key findings are summarised below:

Main purpose	Summary assessment undertaken by Tyler Grange
To check unrestricted urban sprawl	<p>The site benefits from strong boundaries on all sides, including permanent urban features to the west and north, and the Bridgewater Canal to the south. It would also be bounded to the east by draft allocation MD3 should it be delivered.</p> <p>As the site is enclosed by permanent built infrastructure, development would not sprawl any further in any direction.</p>
To prevent neighbouring towns merging into one another	<p>The land contains and is contextualised by previously developed land and a number of existing buildings, and subsequently does not provide a clear break between the proposed allocation and Runcorn Moore Village.</p> <p>Linear development already extends from Moore along Runcorn Road, and the true strategic gap between Warrington and Runcorn is provided by open land to the south, between Runcorn Road and the A56.</p> <p>The allocation of our client's land would not materially impact on this gap, and the retention of such a narrow tract of land would not preserve openness or indeed the perception of openness in this location.</p>
Safeguarding the countryside from encroachment	<p>Although the site is presently partly open and undeveloped, it is influenced by the adjacent built development within the site, and to the west at Moore. Any contribution would be further weakened by the allocation and delivery of MD3 on adjacent land to the east.</p>
Preserve the setting and special character of historic towns	<p>The site does not play a role in the setting or significance of the historic settlements.</p>

3.12 As set out above, the site is considered capable of being developed without resulting in unrestricted urban sprawl or coalescence of urban areas and with respect to landscape and visual matters. On this basis, it is considered that our site makes a 'weak' contribution to the openness and main purposes of the Green Belt.

3.13 This is further supported by the allocation of adjacent land to the east through draft policy MD3 (fully assessed above). 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.

3.14 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."*

3.15 The release of our client's site for housing development would help to meet the identified housing requirements for sustainable development. The revised Green Belt boundary of Moore Lane to the west and the railway line to the north (as originally set out in the 2017 SW Development Framework) would ensure defensible, permanent and readily recognisable features.

3.16 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 release 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.

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.

- 3.17 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)

- 3.18 The SA forms part of the evidence base for the Submission Version Local Plan consultation, and assesses our client's site as per its SHLAA reference (R18/005) as follows:

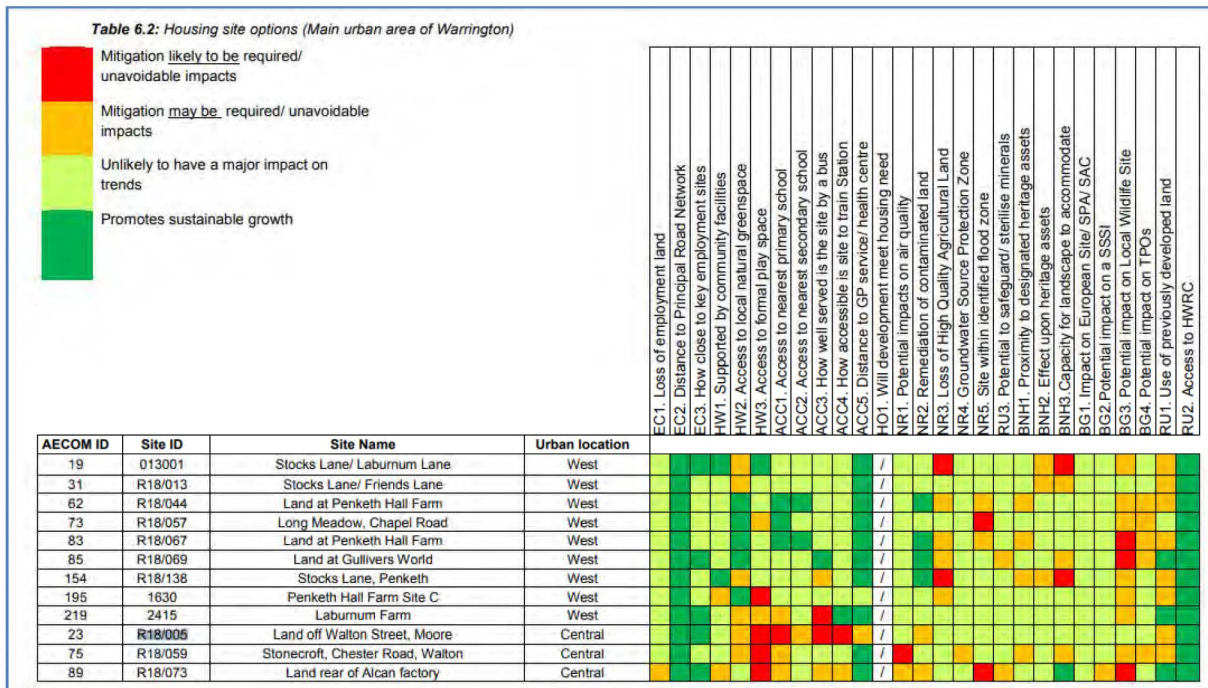


Figure: SA Assessment (2019)

3.19 The SA confirms that the site is in a sustainable location and there are no constraints that could not be mitigated as part of a development scheme. The site did not perform well in terms of access to formal play space, primary schools and public transport. However, draft policy MD3 proposes a new two form entry primary school, as well as a comprehensive package of transport improvements and a range of formal open spaces, including playing pitches and smaller areas of open space within the proposed residential areas. The site could contribute towards proposed infrastructure improvements and new residents would benefit directly from its delivery.

3.20 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

3.21 We are not aware of any site-specific constraints that would prevent the delivery of the site (particularly the two larger parcels separated by Runcorn Road) for residential development. These parcels could deliver as standalone residential allocations or as part of proposed allocation MD3, with access taken off Runcorn Road.

- 3.22 We are not aware of any ecological or contamination constraints that would prevent delivery of the site, and there are no flood risk concerns with the entirety of the site situated within flood zone 1 as set out on Environment Agency flood risk mapping. There are no topography issues.
- 3.23 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. Wainhomes has an excellent track record of delivering market and affordable housing in tandem with other developers as part of larger allocations throughout the North West. Allocating our client's site within MD3 (as originally proposed in the 2017 version of the plan) would ensure early delivery of much needed housing in a borough with an acute housing need.
- 3.24 The site could deliver a high quality and sustainable extension 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, with houses sited such that they positively address the public realm.
 - The opportunity for extensive tree planting to the edges of the development site, particularly to the west.
 - Provision of areas of on-site play and open space and retention of ecological features such as mature trees that define the dismantled railway.
 - Desirable linkages for existing and future residents through the site, in line with the wider objectives of the South West Extension.
- 3.25 Our client would conduct a masterplanning exercise in partnership with the Council and other stakeholders in the South Extension in order to ensure an optimum relationship with other proposed development within draft allocation MD3.
- 3.26 As set out above, the primary access point into the site would be off Runcorn Road. Access could be achieved for the proposed quantum of residential development as set out in the South West Extension Development Framework (2017), as a standalone allocation. Further, it could provide a permeable access scheme with a positive relationship with existing development to the west and the wider draft allocation MD3 to the east.
- 3.27 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 (R18/005) in the Sustainability Appraisal (2019).

Deliverability

- 3.28 The site is available for development. Wainhomes (NW) Ltd is a national housebuilder based in Birchwood and is very active across the region with a proven track record in the delivery of new homes. Subject to the land being released from the Green Belt and any masterplanning requirements under Policy MD3, the site could make a significant contribution to the supply of housing.

4. Local infrastructure

- 4.1 Should proposed draft allocation MD3 be delivered, the site would form its western gateway and would consequently be adjacent to 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.
- 4.2 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.
- 4.3 This is supported by the proposed allocation of the adjacent land to the east through draft policy MD3, which confirms that the site is in a sustainable location with no major infrastructure constraints. However, as stated above, we would question whether the full scale of infrastructure provision allocated within MD3 can be achieved without our client's site.

5. Summary and conclusions

- 5.1 In summary, it is considered that draft allocation MD3 should be expanded to include our client's site, with identified land being removed from the Green Belt and allocated and/or safeguarded for residential development. Strategic representations submitted separately on behalf of Wainhomes confirm there is a need for additional sites, and it is considered that this

entire land parcel could come forward as one allocation to help address this requirement. The Council has already considered the site to be a sustainable location for residential development through its proposed allocation in the 2017 iteration of the emerging plan.

5.2 This is particularly supported by the Council's own assessments in the South West Extension Development Framework (2017) which explicitly identifies the site for residential development.

5.3 Our site-specific representations can be summarised as follows:

- The site makes a 'weak' contribution to the Green Belt, and the authority itself concludes that the site only makes a 'moderate' contribution. This is further supported by the proposed allocation of site MD3, which further weakens the contribution made by a parcel that would consequently be essentially landlocked by strong defensible features on all 4 boundaries, including residential development to the west and east, a watercourse to the south and existing railway line to the north.
- The release of the land from the Green Belt for housing is fully justified in line with the requirements of the NPPF;
- 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.
- Wainhomes Developments Ltd is a national housebuilder based in Birchwood with a proven track record of delivery in the region – the site is 'deliverable' for new housing within the short-term and could make a meaningful contribution to the Borough's 5-year housing land supply position.

5.4 The allocation of the site would make a significant contribution towards meeting the identified housing need in Warrington, and is a highly logical site for residential development, particularly in the context of proposed allocation MD3, the delivery of which would result in our site being bounded on all four sides by permanent urban features. The site should therefore be allocated as part of draft allocation MD3.

5.5 At the very least, the site should be identified as safeguarded land in order to meet the long term needs of the Borough or to provide flexibility should Warrington fail to meet its housing requirement during this plan-period.

6. Appendices

EP1. Site location plan

EP1

Jackie Priestner / Kerrie Darbyshire Land

Total: Approx 32.51 acres / 13.16 Ha

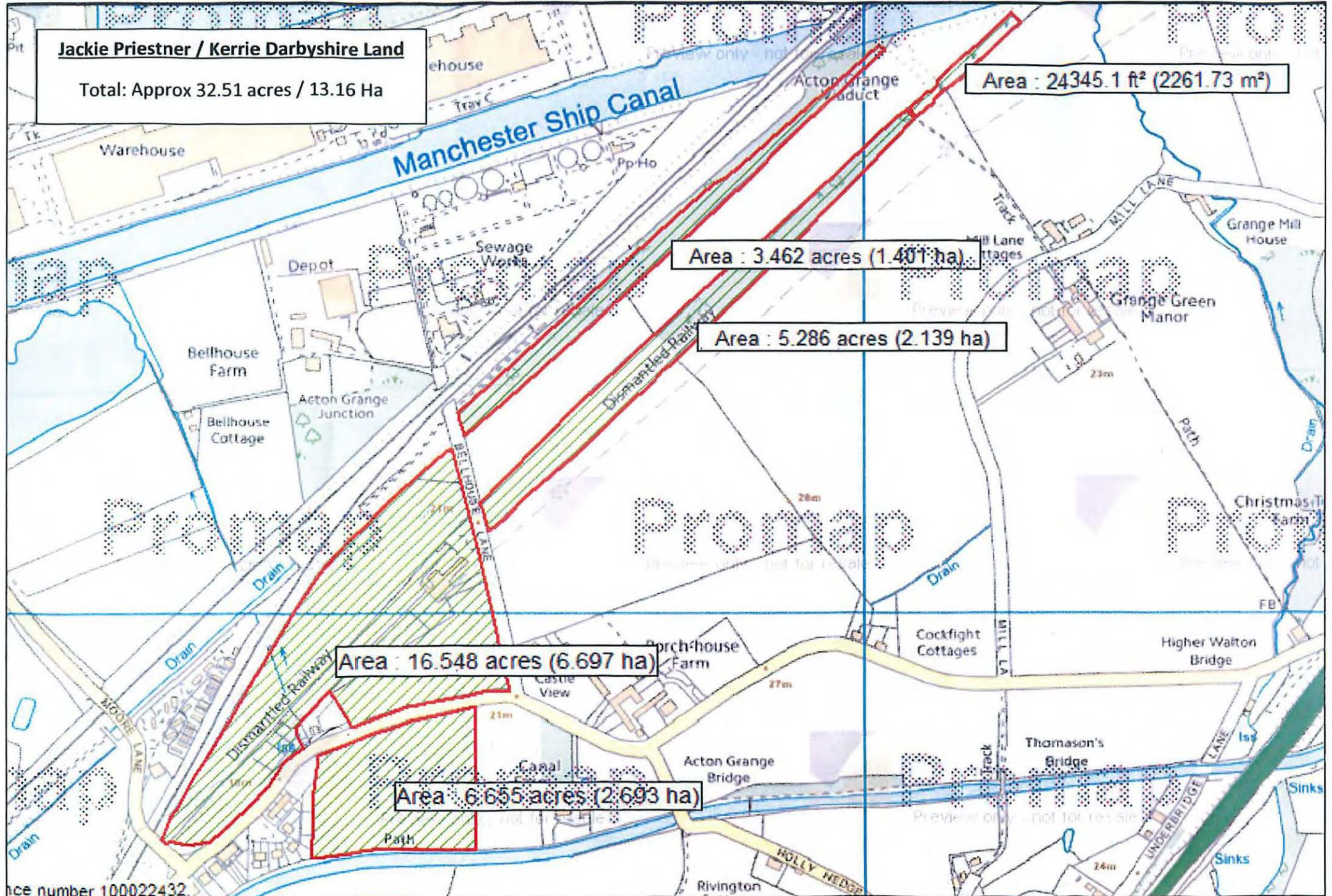
Area : 24345.1 ft² (2261.73 m²)

Area : 3.462 acres (1.401 ha)

Area : 5.286 acres (2.139 ha)

Area : 16.548 acres (6.697 ha)

Area : 6.655 acres (2.693 ha)



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17 June 2019

EPP ref: 18-098

Shaun Gaffey


Dear Sir or Madam

Re: Wainhomes (NW) - Warrington Local Plan – Proposed Submission Version 2019
- Land at Top Farm, Broomedge, Lymm

We are instructed by Wainhomes (NW) Ltd to submit the site known as Land at Top Farm, Broomedge, Lymm (hereby referred to as 'the site') to inform the authority's preparation of the emerging Warrington Local Plan proposed Submission Version document. We also made representations to the Preferred Options consultation in 2017. The site is submitted as a potential allocation for residential development.

The site comprises the farmhouse itself along with its associated outbuildings and four adjacent fields which are currently used for farming purposes. The site is well enclosed, bounded to the north by Higher Lane, to the east by High Legh Road, to the south by Kay Lane and to the west by a track which serves the property known as Field House. The site is in the Green Belt in its entirety. A site location plan is enclosed with this letter.

The site benefits from good access, and we are not aware of any issues relating to ownership, 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. It is in the centre of the village of Broomedge, and is therefore very well related to the modest amenities in this settlement. It is also very well related to the settlement of Lymm to the west, and benefits from being adjacent to a bus stop with regular services along the A56 to Altrincham to the east, and to Lymm and Warrington to the west.

Delivery of the site as a standalone residential allocation would contribute towards ensuring a flexible supply of housing land that could be delivered early in the plan process; which currently depends upon the timely delivery of large, new infrastructure dependent draft allocations such as the Warrington Garden Suburb. This flexibility is essential in the event of any slippages in delivery of these large allocations.

At the very least, it is considered that the land should be safeguarded for residential development beyond the plan period, or in the event that the authority fails to deliver the required number of market and affordable housing in this plan period, which is considered to be significant.

This concludes our representations. Please do not hesitate to contact me or my colleague John Coxon should you have any further queries.

Yours sincerely
Emery Planning

Shaun Gaffey MTCP (Hons)
Consultant

EP1



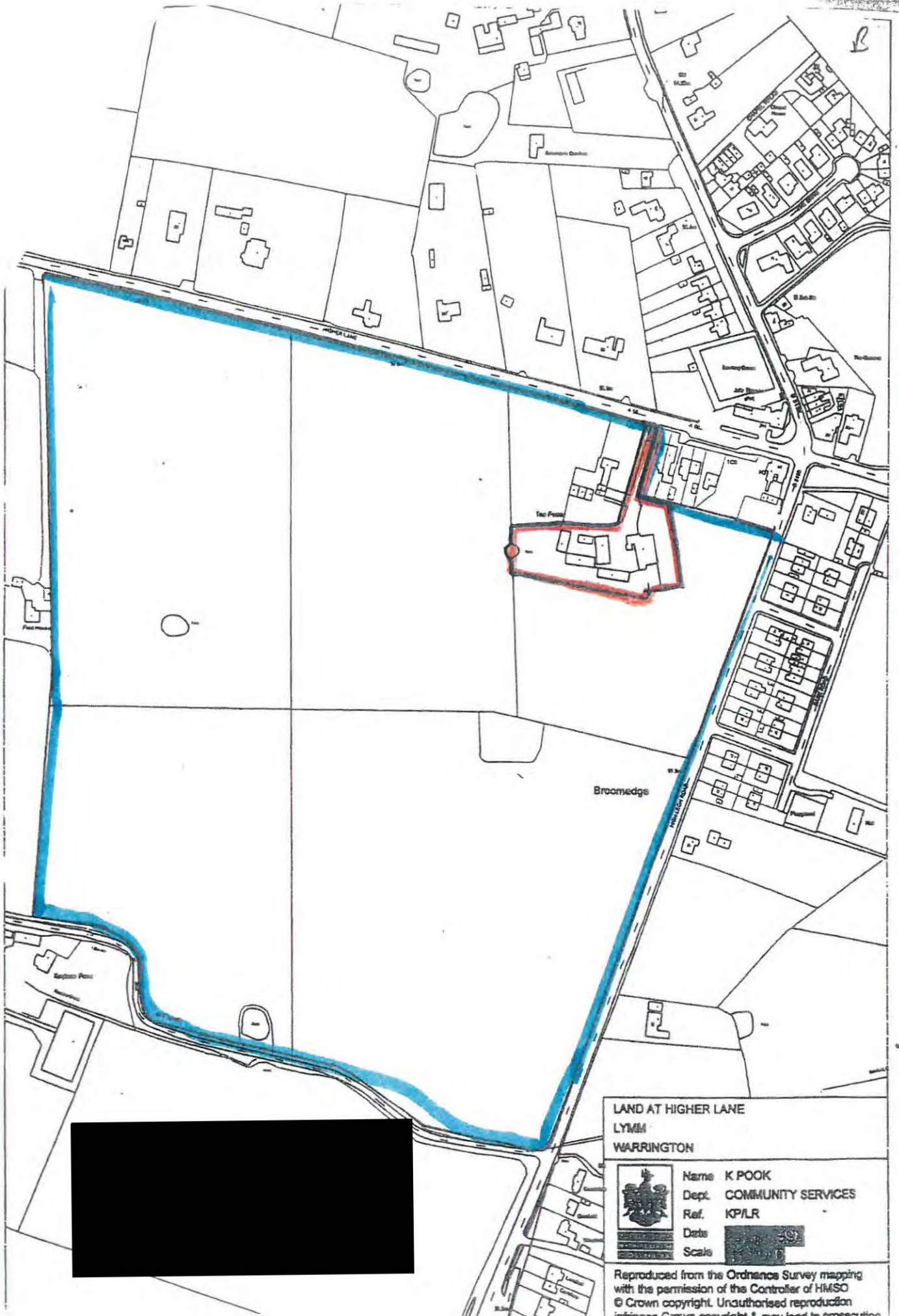
Top Farm, Higher Lane, Lymm

Write a description for your map.

Legend



1 km



**LAND AT HIGHER LANE
LYMM
WARRINGTON**



Name K POOK
 Dept. COMMUNITY SERVICES
 Ref. KP/LR
 Date [REDACTED]
 Scale [REDACTED]

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