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Your ref

Dear Sirs

Warrington Local Plan Review - Regulation 18 Consultation

I write in response to the current consultation on the Local Plan Review which was approved for consultation by the Executive Board of the Council on the 10th October 2016. Our response is on behalf of Maro Developments Ltd and Countryside Properties (UK) Ltd and specifically in the context of their interests at Spectra Park, Warrington.

My clients land interests includes land required for the proposed Centre Park Link Road (including the bridge over the River Mersey, and land upon which it is proposed to develop for residential purposes for up to 550 dwellings. The land is identified as part of a Strategic Allocation LPCS CS9 Strategic Location Inner Warrington according to the Policies Map. The extent to which this site relates to Policy CS10 (Waterfront & Arpley Meadows). There is no part of the Local Plan that designates the alignment of the Centre Park Link Road and this is not shown on the Policies Map.

Fundamentally it is considered that the Local Plan Review should include a detailed review of the strategic allocations within the plan and that Spectra Park should be identified specifically and allocated for residential development. This should flow out of the call for sites exercise when the deliverability of a range of sites should be considered. However, the allocations within the adopted plan need to be reconsidered and the deliverability of individual sites should be considered.

In respect of my client's interests, their site is considered to be entirely deliverable in the short term. A planning application is currently in preparation and will be submitted in the short term. It is expected that this will be considered alongside a planning application for the Centre Park Link Road, which will also be submitted imminently.

The documents that are the subject of consultation are:

1. Local Plan Review - Scope and Contents Consultation Document; and,
2. Local Plan Review - Sustainability Appraisal Scoping Report.



The Councils evidence base which underpins the Local Plan Review has also been updated with the release of the following documents:

3. Green Belt Assessment - Main Report & Appendices;
4. Economic Development Needs Assessment;
5. Review of Economic Forecasts and Housing Numbers;
6. Urban Capacity Statement;
7. Mid Mersey Strategic Housing Market Assessment (SHMA) - Addendum for Warrington;
and,
8. Annual Monitoring Report.

These are not specifically part of the current consultation. Alongside the above consultation the Council has undertaken a 'Call for Sites' exercise which seeks to encourage the identification of land that may support the borough's development needs.

I have set out in the attached document our response to the current consultation questions (in so far as my clients have a response to the specific questions posed). Where my client has no response this should not be considered as a positive or negative response, and is in effect a neutral position. My clients reserve the right to reconsider their position on any one issue once further information is available.

If you have any questions regarding the response to any of the questions, or indeed any of the matters set out in this letter, then please do not hesitate **to** contact me.

Yours sincerely

Simon Pemberton
Senior Director

Copy: Mr I Simpson (Countryside Properties (UK) Ltd); Nigel Smith (Countryside Properties (UK) Ltd); Chris Stroud (Maro Developments Ltd)



ANNEX 1 – RESPONSE TO QUESTIONS

Question 1 - Do you have any comments to make about the Council's evidence base?

My clients have no comment to make in respect of this question.

Question 2 - Do you consider the assessment of Housing Needs to be appropriate?

My clients have no comment to make in respect of this question.

Question 3 - Do you consider the assessment of Employment Land Needs to be appropriate?

My clients have no comment to make in respect of this question.

Question 4 - Do you consider the alignment of Housing Needs and Job's Growth to be appropriate?

My clients have no comment to make in respect of this question.

Question 5 - Do you consider the assessment of Land Supply to be appropriate?

My clients have no comment to make in respect of this question.

Question 6 - Do you consider that Green Belt land will need to be released to deliver the identified growth?

Yes. Based on the findings of the evidence base, Green Belt release will be necessary. A detailed assessment of the deliverability / developability of brownfield sites such as Spectra Park should be undertaken in order to discern the necessary scale of release.

Question 7 - Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?

Those matters that are identified are agreed as the principle matters for the Local Plan Review, however, the LPR should also address the practical consequences arising from those matters and should consider strategic allocations and reconsider allocations in the Core Strategy so as to demonstrate the deliverability of those sites. For example, it is considered that policies CS9 and CS10 should be reconsidered to provide more specific guidance in respect of my clients site. It is considered that this should be allocated for up to 550 dwellings (the current sketch scheme shows a development of 537 dwellings comprising a mix of houses and apartments). It is considered that



this is of sufficient size to warrant its own strategic allocation. Consideration should also be given to the interrelationship between this and the Centre Park Link Road [CPLR] (and related highway improvements). Bearing in mind the significant role in facilitating and potentially funding the CPLR it may be advantageous to have a single policy that addressed both, or a site specific policies for individual components with cross referencing as appropriate.

Question 8 - Do you agree that further land will need to be removed from the Green Belt and Safeguarded for future development needs beyond the Plan period?

Yes. It is considered that sufficient land should be removed from the Green Belt and Safeguarded to meet future development needs so as to mean that a further review of the Green Belt, in so far as is reasonably be predicted, is not expected to be necessary for the plan period proceeding the current plan period.

Question 9 - Do you consider it appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Local Plan review?

My clients have no comment to make in respect of this question.

Question 10 - Do you consider the Sustainability Appraisal Scoping Report to be appropriate?

Question 11 - Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?

No. The role of the Local Plan in identifying a scale and distribution of development that meets needs and also creates sustainable patterns of development (and any mechanism for balancing these concepts) is not properly identified in the flow diagram, and although various technical matters that feed into the concept of sustainable development are included, this is not the same.

Question 12 - Do you agree with the assessment of Local Plan Policies at Appendix 1?

No. It is considered that Policy CS9 (Strategic Location Inner Warrington) and Policy CS10 should be subject of major revision as it is this designation that is shown on the Policies Map on my clients land. It is considered that the policy should be amended to include specific proposals for this site (as shown on the attached plan). It is considered that the plan provides insufficient clarity on these designations, their scope and interrelationships, and this would be better reflected in a more structured series of policies including a specific policy that deals with Spectra Park and also the CPLR

Question 13 - Do you consider the proposed 20 year Local Plan period to be appropriate?



My clients have no objection with a 20 year plan period, however, the reason given by the Council for having a plan period of this length is not endorsed. Paragraphs 3.8 - 3.10 do not provide a full rationale in this respect. In terms of the issue of Green Belt, and the issue of permanence, this issue should be addressed through the identification of safeguarded land in accordance with our response to Question 8 above. It is not considered that the extension of the plan period is sufficient a response to this issue and the need to identify safeguarded land remains.

Question 14 - Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?

Please see my client's response to the questions above for matters that they consider should be addressed in the Preferred Options consultation. My client is happy to provide any further details in respect of their site, albeit they envisage and application having been submitted, and hopefully determined, before the next stage of the Local Plan Review is significantly advanced.