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Warrington Borough Council

Local Plan Review

Regulation 18 Consultation: Standard Response Form

October 2016

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1: Contact Details (Compulsory)

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2: Questions

Question 1

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

Question 2

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

Question 3

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

Question 4

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

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

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

Question 7

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

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?

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?

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?

Question 12

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

Question 13

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

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?

3: Responses

Question 1

For all questions please see enclosed representation letter

Question 2

Question 3

Question 4

Question 5

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Question 10

Question 11

Question 12

Question 13

Question 14

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5 December 2016

EP ref: 14-116

Stephen Harris
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Dear Sir/Madam

Re: Representations to the Warrington Borough Council Regulation 18
Consultation

Emery Planning is instructed by Wainhomes North West Ltd to prepare and submit representations to the Regulation 18 Consultation currently being conducted by Warrington Borough Council.

The representations are submitted in the form of this representation, which assesses the strategic element of the consultation before going on to promote the land south of Lumber Lane, Burtonwood as part of the call for sites. We enclose the completed Call for Sites form and location plan.

We address each relevant question as set out in the Regulation 18 Consultation Standard Response Form in turn. Many of the questions are linked which results in some repetition in our responses. We answer questions relevant to our client's interests only.

Regulation 18 Consultation

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

Paragraph 2.6 states that an Objectively Assessed Need of 839 new homes (to include 220 Affordable units) per year up to 2037, and an additional 62 bed spaces in Care Homes (specialist housing for elder people), per year up to 2037. This is a total of 901 dwellings per annum.

The plan has then sought to provide a homes/jobs balance which we answer next.

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

We acknowledge the need for demographic projections to provide the starting point for the assessment of housing need to ensure the approach complies with national policy/guidance and best practice. However, we support the approach taken by the Council which seeks to ensure that the economic and employment potential of the area is not constrained by a lack of available workforce.

The figure of a minimum of 1,000 homes per annum is supported. However the evidence base rightly sets out that there are various assumptions to take account as part of the methodology. However we do question a number of these assumptions, for example;

- The increased productivity (10.45%) of the workforce and longer retirement ages, which has resulted in a reduction in the housing need; and,
- Seeking to maintain a commuting rate of 88% which results in net in-commuting to Warrington. The plan should seek to reduce the level of in commuting by providing a range of housing type, size and tenure to meet the needs of the workforce in the Borough.

Our overall position is that whilst we support the uplift in the housing requirement to that in the Core Strategy, we have concerns on the actual uplift set out in the evidence base to provide homes/jobs alignment and the uplift should be greater.

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

Our client's specific interest is Green Belt land. Paragraph 2.20 of the consultation document states that if Warrington is to meet its development needs, then based on the updated assessment of urban capacity, sufficient Green Belt land will need to be released to deliver approximately 5,000 homes and 261 hectares of employment land over the next 20 years.

This figure is based on a total housing land supply in the urban area and on green field sites outside of the Green Belt of approximately 11,500 dwellings as set out in paragraph 2.15 of the consultation document. Paragraph 2.16 then states that Warrington & Co have commissioned more detailed master planning work relating to the town centre and inner Warrington, including the Waterfront Strategic Development Opportunity. This has identified the potential for approximately 3,500 homes in addition to those identified in the SHLAA over the next 20 years.

We have significant reservations on the urban capacity and specifically the town centre in meeting that level of new dwellings in the plan period. Therefore going forward there should be a recognition that the level of Green Belt releases is likely to be significantly greater.

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

Yes.

It is apparent from the evidence base that a significant amount of Green Belt will now need to be released in order to meet the objectively assessed housing and employment needs. This need provides the exceptional circumstances required for Green Belt release as well as the identification of safeguarded land.

The Green Belt in Warrington has not been reviewed in full for a significant period of time, during which development needs have not been met and adverse housing market signals have been allowed to worsen.

Paragraph 84 of the Framework requires that when reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

In the case of Warrington, there would be very significant adverse social and economic consequences of not providing sufficient land to meet the objectively assessed needs. Warrington's neighbours (such as Cheshire East and Cheshire West) have recently prepared their own Local Plans, including Green Belt release, and are unlikely to be in a position to meet any of Warrington's need. Therefore it is apparent that the Green Belt around Warrington will need to be comprehensively reviewed and redrawn to provide land for development to meet the full housing need.

It appears that our view above is aligned with the Council. However where we take issue with the consultation paper is the quantum of Green Belt release required. The Scope and Contents document indicates that land for approximately 5,000 dwellings will need to be found in the Green Belt. For reasons set out elsewhere within these submissions, we consider that this figure substantially under-estimates the amount of land that will need to be released from the Green Belt.

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

Whilst we agree that the matters identified are the main issues, we consider that they necessitate a full review of the Local Plan. The amount of land required for housing and employment goes to the very heart of the Local Plan, and has wide ranging implications for the vast majority of its policies.

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.

Paragraph 83 of the Framework requires that when Green Belt boundaries are established or reviewed, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Paragraph 85 states that when defining boundaries, local planning authorities should 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. They should also satisfy themselves that Green Belt boundaries will not need to be reviewed at the end of the plan period.

Therefore national policy is clear on the need to provide for safeguarded land. In Warrington, it is clear that the borough will continue to be a focus for development, and it is therefore critical that sufficient safeguarded land is provided to meet needs stretching well beyond the period.

How much safeguarded land is needed in practice was considered in detail at the Cheshire East Local Plan examination, which is now reaching its final stages. 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. 2037 to 2057) 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.

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

We consider that the process set out in Appendix 2 is appropriate subject to one alteration. The alteration is that the spatial distribution should not just be informed by the availability of sites not in the Green Belt and across the Borough but that the needs of settlements, for example Burtonwood, are also taken into account. Each settlement should grow sustainably and provide a choice of location to existing and future Warrington residents which would accord with paragraph 50 of the Framework which seeks to "identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand".

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

We consider that a full review of the Local Plan is required. The amount of land required for housing and employment goes to the very heart of the Local Plan, and has wide ranging implications for the vast majority of its policies. This must include the spatial dimension of the plan.

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

We consider the proposed 20 year plan period to be appropriate in this instance. It is inevitable that the release of Green Belt land will take a significant amount of time to achieve. It is therefore prudent for the authority to extend the usual timeframe of 15 years to 20 as it will facilitate a logical approach to strategic land release in the borough.

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?

This completes our representations from a strategic perspective. We now submit specific site for consideration in the call for sites exercise.

Call for Sites Exercise

Land south of Lumber Lane, Burtonwood

Our particular interest relates to the land south of Lumber Lane, Burtonwood. A location plan is enclosed for ease of reference, along with the appropriate forms.

The site is a logical extension to Burtonwood. It is 10.07 hectares in size and comprises of land in two ownerships. The land owned by Mr Halton is 4.54 hectares and the land owned by Mr Owen is 5.53 hectares. The site is promoted for residential development however if there was an element of employment, retail or community uses required then this would be considered going forward.

The site has been assessed as part of a wider parcel of land in the Green Belt Assessment as 'BW3'. In that assessment 9 parcels of land were assessed adjacent to Burtonwood. As can be seen from the extract below, BW3 was assessed to be a 'moderate' contribution to the Green Belt purposes. All of the others in Burtonwood assessed as a strong contribution.

Table 10. Summary table of parcel assessment findings

Level of contribution	Parcel Reference
Strong contribution	Lymm: LY3, LY4, LY5, LY6, LY7, LY8, LY10, LY11, LY12, LY17, LY18, LY19, LY21, LY22, LY25, LY26 Grappenhall: GH5, GH6 Hollins Green: HG1, HG2, HG5, HG6 Warrington urban area: WR4, WR15, WR16, WR17, WR20, WR21, WR22, WR23, WR30, WR31, WR32, WR39, WR50, WR51, WR52, WR54, WR55, WR56, WR68, WR69, WR70, WR71, WR78, WR79, WR80, WR81, WR82, WR83, WR84 Glazebury: GB3, GB4, GB5, GB9, GB10, GB12, GB13 Culcheth: CH1, CH2, CH3, CH4, CH5, CH6, CH7, CH10, CH11, CH12, CH13, CH15 Burtonwood: BW1, BW2, BW4, BW5, BW6, BW7, BW8, BW9 Winwick: WI3, WI4 Croft: CR1, CR2, CR3, CR5 Appleton Thorn: AT7, AT8, AT9, AT14
Moderate contribution	Lymm: LY2, LY9, LY13, LY14, LY16, LY23, LY24, LY27 Cadishead: CD2 Grappenhall: GH4 Hollins Green: HG4 Warrington urban area: WR1, WR2, WR3, WR5, WR6, WR7, WR8, WR18, WR24, WR25, WR26, WR27, WR28, WR29, WR37, WR38, WR41, WR42, WR44, WR45, WR53, WR57, WR58, WR59, WR60, WR62, WR63, WR64, WR65, WR73, WR74, WR75, WR77 Glazebury: GB2 Burtonwood: BW3 Winwick: WI5, WI6, WI7, WI8, WI10 Croft: CR4, CR8 Newton-le-Willows: NW1 Appleton Thorn: AT1, AT2, AT5, AT11, AT12, AT13, AT16
Weak contribution	Lymm: LY1, LY15, LY20, LY28 Cadishead: CD1 Grappenhall: GH1, GH2, GH3, GH7, GH8 Hollins Green: HG3 Warrington urban area: WR9, WR10, WR11, WR12, WR13, WR14, WR19, WR33, WR34, WR35, WR36, WR40, WR43, WR46, WR47, WR48, WR49, WR61, WR66, WR67, WR72, WR76 Glazebury: GB1, GB6, GB7, GB8, GB11 Culcheth: CH8, CH9, CH14 Winwick: WI1, WI2, WI9 Croft: CR6, CR7 Newton-le-Willows: NW2, NW3, NW4

Therefore from the evidence base BW3 would be the most logical and have the least Green Belt impact to meet housing need at Burtonwood in this plan period.

Strategic Housing Land Availability Assessment (SHLAA)

The SHLAA has assessed the site as two separate parcels. The SHLAA was predicated on the basis that Green Belt sites would not be suitable due to that policy constraint. However with the recognition in the current consultation document that at least 5,000 dwellings will be required through Green Belt releases, the proposed site is a deliverable site. For ease of reference we summarise each parcel below.

SHLAA Reference - 1534

The SHLAA assessed a range of site specific issues and are as follows.

- Green Belt: Yes
- Greenfield / PDL: Greenfield

- Flood Zone: 1
- Contaminated Land Issues: No
- Ground Conditions Issues: Yes - Capable of being resolved
- Site Access Issues: No
- Surrounding Land Issues: No
- Infrastructure Issues: No
- Hazardous Installations Issues: No
- Amenity Issues: No

The concluding comments state:

"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".

Therefore there are no site specific matters which would prevent the site from being suitable. We can confirm it is available and achievable and therefore deliverable.

SHLAA Reference - 2146

The SHLAA assessed a range of site specific issues and are as follows.

- Green Belt: Yes
- Greenfield / PDL: Greenfield
- Flood Zone: 1
- Contaminated Land Issues: Yes
- Ground Conditions Issues: Yes -
- Capable of being resolved Site
- Access Issues: No
- Surrounding Land Issues: No
- Infrastructure Issues: No
- Hazardous Installations Issues: No
- Amenity Issues: No

The concluding comments state:

"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."

Therefore there are no site specific matters which would prevent the site from being suitable. The only issue identified is contaminated land, however the site is greenfield and we are not aware of

any contaminated land issues. However if required this can be confirmed, however it will not prevent the site from being developed.

We can confirm the site is available and achievable and therefore deliverable.

This concludes our representations for this site.

Yours sincerely
Emery Planning

Stephen Harris BSc (Hons), MRTPI
Director