

06 December 2016

Warrington Borough Council
Planning Policy & Programmes
New Town House
Buttermarket Street
Warrington
WA1 2NH

Sent by email

Dear Sir/ Madam,

**Warrington Local Plan Review - Regulation 18 Consultation
Representations on behalf of Taylor Wimpey**

On behalf of our client, Taylor Wimpey UK Limited (TW), we set out representations to the Warrington Local Plan Review Regulation 18 Consultation and associated Call for Sites Exercise, principally in relation to their land interest at Stocks Lane, Penketh.

We welcome the Council's decision to invite comments at this early stage in the review of their Local Plan, as this demonstrates a positive and proactive attitude to engagement. We wish to state at the outset our support for the proposed Green Belt release and the associated call for sites exercise which we believe to be an essential step in securing sufficient housing land to facilitate the Borough's intended growth.

Within the context of this general support, and in order to ensure that the Local Plan review produces a truly sound outcome, the comments hereby submitted serve to highlight a number of aspects of the Council's evidence base which require revision or additional analysis in order to be considered suitably robust.

Land Interests and Site Description

Taylor Wimpey are promoting a site of approximately **30.8 ha** to the west of Stocks Lane, Penketh and as such the site can be regarded as available and deliverable.

The site is located within the Green Belt to the west of Penketh immediately adjacent to the urban boundary. Penketh Brook runs through the southern part of the site. With surrounding land (approximately 3 Ha) falling within Flood Zone 3. The land is and historically has been in agricultural grazing use and has a flat topography. There are hedgerows and tree planting

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along the field boundaries, which form robust boundaries around the site, and there is a denser area of trees just north of Penketh Brook.

To the north the site is bound by the Warrington to Liverpool Railway Line, with Farnworth Road to the south which is lined by residential properties and farm buildings. The eastern boundary comprises the rear of the residential properties fronting Stocks Lane, with Brookside Farm in the south east corner. Open agricultural fields lie to the west.

The site benefits from good access to a range of services within the existing urban area to the east. Warrington Road Local Centre is within 1 km and includes two Co-op supermarkets and several smaller unit shops including takeaways and salons. The larger Honiton Way Neighbourhood Centre is 1.5 km away and also includes a library, bank, post office, swimming pool and a number of restaurants / cafes.

The nearest primary school to the site is Penketh Community Primary School, which is a 1km walk from the site, and there are two further primary school within 2km of the site. The nearest secondary school is Penketh High School which approximately 2 km from the site.

There is a bus stop located on Farnworth Road, at the southern boundary of the site. This stop is served by the number 7 bus, which serves Warrington town centre, as well as Huyton and Liverpool, via a twice hourly service which runs 7 days a week. There are also additional services from a bus stop located on the A562, to the south of Doe Green, approximately 700m walk from the centre of the site.

Sankey for Penketh Train Station is located within a 2.5km walk, to the north east of the site, providing regular direct services to Liverpool, Warrington and Manchester.

There are a wide range of employment sources of local and regional importance within close proximity of the site including Omega and Lingley Mere, Inner Warrington and the Town Centre, the Waterfront and Arpley Meadows, and Port Warrington. The site will interact effectively with these employment locations both in terms of supporting the labour supply and acting as a customer base for local businesses.

This demonstrates that this is a sustainable and accessible site, with no obvious technical constraints preventing its development for residential purposes.

Proposed Development

Taylor Wimpey have undertaken an initial assessment of the site in terms of its opportunities and constraints and consider the site could accommodate **600-650** new homes with associated access, landscaping and open space. The main vehicular access is proposed from Farnworth Road, with a primary access loop within the site. Further highway work will be completed in the early part of 2017.



Further details on the site are set out within the attached Call for Sites Registration Form, with the initial indicative layout shown on the attached Proposed Site Masterplan (ref: 1111-TWIK-SK1), prepared by GTD Ltd.

These initial proposals will be developed into a Development Statement, which will be submitted before the formal Regulation 18 consultation in May 2017.

Representations to Consultation Documents

In addition to the Call for Sites exercise, the consultation invites responses to 14 questions covering a suite of documents, including the main Scope and Contents Document and several evidence base documents, and we respond to selected questions below.

We note that this scoping consultation stage is not compulsory; however we welcome Warrington's decision to invite early comment on the scope and content of their Local Plan and the various evidence base documents that support it. This should help bring to light any major concerns with the direction of the document or the content and methodology of the evidence base at an early stage, which will make the plan more robust, and head off any delays or potential challenges later down the line.

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

We make comments on specific evidence base documents in the relevant questions below and provide a separate critique of the Green Belt Assessment later in this letter, in relation to TW's interests at Stocks Lane.

The range of evidence seems to be appropriate at this stage, although several documents will need to be updated and developed in more detail as the Plan Review progresses. In particular, the assessment of housing needs, the Urban Capacity Study, the Green Belt Assessment and the Sustainability Appraisal will all need advancing and we would welcome if they could be amended to reflect the comments we made as part of these representations.

Additional evidence base documents will also need to be prepared as per the list in Appendix 2 of the Scope and Contents Document, including:

- Habitats Regulation Assessment;
- Landscape Character Assessment;
- Ecological Assessment;
- Heritage Assessment;
- Environmental Protection Issues;
- Multimodal Transport Model;
- Strategic Flood Risk Assessment;



- Infrastructure Impact Assessment;
- Agricultural Land Classification;
- Impact on mineral reserves;
- Viability Assessment.

The Council will also need to provide evidence to demonstrate that they have worked with neighbouring authorities under the Duty to Co-operate, including how any meetings or discussions have influenced plan preparation. The NPPG stresses the importance of this process, noting that it is unlikely that the duty can be satisfied by consultation alone (para 9-009-20140306), and that: "*Inspectors testing compliance with the duty at examination will assess the outcomes of cooperation and not just whether local planning authorities have approached others*" (para 9-010-20140306).

In addition, the NPPF is unequivocal that cooperation between neighbouring authorities should be "*a continuous process of engagement from initial thinking to implementation*" (para 181). It is therefore essential that engagement over cross-boundary issues such as housing and employment is addressed early and considered throughout the evidence gathering process.

This is particularly important given that the 2016 Strategic Housing Market Assessment (SHMA), published by GL Hearn in January 2016, identifies Warrington is part of a wider Mid-Mersey housing market area along with Halton and St Helens (para 2.120).

Furthermore, Warrington is part of the Cheshire and Warrington Local Enterprise Partnership Area and sits between the Greater Manchester and Liverpool City Regions/ Combined Authorities, which are both progressing City-Region plans. In the case of Greater Manchester, consultation is already underway on the Draft Greater Manchester Spatial Framework (GMSF) which seeks to allocate land for 70,000 houses and over 5,000,000 sqm of employment land over the period to 2035, and this consultation closes on 23rd December 2016.

These and other sub regional studies and strategies will need to integrate with the Local Plan and monitored on an ongoing basis.

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

Warrington’s housing needs were assessed within the Mid-Mersey SHMA published by GL Hearn in January 2016, which also covered the boroughs of Halton and St Helens. A further SHMA Addendum, dated October 2016, has also been provided, which considers the impact of increased job growth within Warrington alone.

Housing Market Area

We agree that Warrington, Halton and St Helens form a distinct Housing Market Area in accordance with the NPPF, as this has been tested through examination in each of the three



authorities, and reinforced by the adjacent authorities when preparing the Greater Manchester and Liverpool SHMA's, which have not found any obvious gaps or overlapping geographies with this Mid-Mersey HMA.

That said, given the regional significance of the Greater Manchester and Liverpool HMA's, these will undoubtedly exert an influence on the Warrington's housing need and supply position, which will need to be addressed in the formal Regulation 18 consultation and monitored on an ongoing basis through the duty to cooperate process as noted above.

Objectively Assessed Needs

The 2016 SHMA concludes that the objectively assessed housing need across the Mid-Mersey HMA is 1,756 dwellings per annum (dpa). In terms of Warrington's individual needs, the SHMA identifies an OAN of 839 dpa (to include 220 affordable units), and an additional 62 bed spaces per year in Care Homes (specialist housing for elder people) up to 2037, and this is set out in paragraph 2.6 of the Scope and Contents Document.

The SHMA Addendum identifies a higher requirement of 984 dpa due to increased job growth projections from the Cheshire and Warrington Local Enterprise Partnership's (CWLEP) devolution proposal which aims to create 31,000 additional jobs in the Borough from 2015 to 2040 (which is discussed in more detail in question 4 below).

Demographic Starting Point

The SHMA figures were based on the 2012 Sub National Household Projections (SNHP), which were published on 12th February 2015. These projections have since been updated with the 2014 SNHP, which were published on 12th July 2016, covering the period 2014-2039.

It is recognised that over the period 2014 to 2037, the 2014 SNHP indicate a reduction in housing need compared to the 2012 projections, and that the NPPG suggests that the most recent household projections should be used where possible to provide the 'starting point' for establishing OAN (paras 2a-015-20140306 & 2a-016-20150227). That said the NPPF still refers to the 2012 SNHP as the latest projections, and GL Hearn have not referred to the 2014 SNHP in the SHMA Addendum, suggesting that they do not consider them to lead to any 'meaningful change' to the housing situation. We agree with this.

Furthermore, the NPPG is clear that the household projections may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. In the case of Warrington, the 2012 SNHP indicate some suppression in household formation of younger age groups in the past (particularly amongst 25-34 year olds, and to a lesser extent 35-44 year olds), which is acknowledged in the SHMA (paras 4.55 and 4.58). This suggests that an uplift for household formation rates is appropriate.



Whilst the SHMA does make an adjustment to household formation rates to take account of this suppression, this is applied to the market signals uplift rather than separately within the demographic projections. The rate of uplift applied in Warrington appears is just 19 dpa (2.3%), and only 47 (2.7%) across the whole HMA. This is far too low and has been applied in a manner that is inconsistent with the NPPG.

The method for applying an adjustment to the household formation rates as part of the market signals uplift conflicts with the NPPG. A clear distinction between adjustments for household formation rates (in para 2a-015-20140306) and market signals (in para 2a-019-20140306) is highlighted. It notes "*The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals*".

The above distinction is also made by the Local Plan Expert Group (LPEG) in their March 2016 recommendations to the Government, which notes that adjustments to household formation rates in younger age groups and for worsening market signals are separate and are both required (see (at Flowchart Steps A & B at page 22, Appendix 6).

Market Signals

The 2016 SHMA does not apply any further uplift to take account of the 6 key market signals identified in the NPPG.

The LPEG approach seeks to standardise the appraisal of market signals and the extent of uplifts across England (0%, 10%, 20% and 25%), based on set house price ratio (HPR) and rental affordability ratio (RAR) thresholds. It is noteworthy that in response to the LPEG consultation document, Peter Brett Associates (PBA) carried out an assessment of all authorities across England and highlighted that Warrington's market signal uplift would fall within the 25% bracket. St Helen's is also in the 25% bracket, with Halton at 20%.

Based on the 25% uplift, the PBA Report calculates an annual requirement figure **1,243 dpa** (24,857 divided by 20 years) for Warrington, without accounting for affordable housing requirements. Even using the SHMA baseline of 820 dpa (before the 19 dpa uplift), this would increase the OAN figure to **1,020 dpa**.

Clearly the LPEG approach has not yet been adopted. In addition, it compares market signals on a national basis, when the NPPG suggests that local and regional comparisons should also be considered. That said, the local comparisons in the Mid Mersey SHMA confirm that Warrington performs worse than the HMA and regional average on three key indicators, namely house prices, private rents and lower quartile affordability ratios. Indeed, taking mean house prices as an example, these are 16.3% higher in Warrington (£185,481 in 2014) than the HMA (£159,565) and 12.7% higher than the North West average (£164,529). This further suggests that the 2.3% and 2.7% market signal uplifts that have been applied are too low.



Housing Need Conclusions Based on Market Signal Approach

It is our view that worsening market signals in Warrington justify a further upward adjustment to the OAN figure. When combined with the minimal uplift to household formation rates, this suggests that the OAN figure of **839 dpa** will need to be increased beyond 1,000 dwellings dpa

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

We support the findings of the Economic Development Needs Assessment (EDNA), which identified a requirement for 381 hectares of employment land over the next 21 years, and comment on some specific elements below.

Firstly, we note that the defined Functional Economic Market Area for Warrington in the EDNA has significant crossover with the Greater Manchester area (in particular Wigan, Trafford and Salford and Manchester City Centre), and the GMSF process as noted above. The GMSF will obviously have a significant bearing on employment land patterns in Warrington. We therefore reserve the right to make further comments to future consultations on this basis.

Secondly, we welcome the EDNAs acknowledgement that several of the Borough's existing employment areas are no longer deliverable and should not be considered as part of Warrington's realistic land supply, as this accords with the NPPF requirement to "*avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose*" (paragraph 22). However, the Scope and Contents Document and Urban Capacity Study confirm that none of these sites have been considered suitable for housing, beyond those already identified in the SHLAA.

Finally, we would highlight paragraph 10.49 of this report, which confirms that the 'policy on' position for job growth, which is based on the targets within the CWLEP Strategic Economic Plan, is no more ambitious than the Oxford Economics forecasts, and less ambitious than the Cambridge Economic Forecasts which provides some validation of the figures proposed by the CWLEP within their later devolution proposal, and this is relevant to question 4 below.

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

We fully support Warrington Council's aim to align job growth and housing needs as this is wholly consistent with the NPPG (para 2a-018-20140306), and the NPPF (para 158), which states that:

"local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals."



The 2016 SHMA Addendum considers the impact of the CWLEP devolution proposal to create 31,000 additional jobs in the Borough from 2015 to 2040, which translates into 28,520 additional jobs over the SHMA period to 2037. It is noted that the Council consider this level of economic growth to be achievable based upon past history (paragraph 2.12 of the Scope and Contents Document); however the 'Review of economic forecasts and housing numbers' (October 2016), prepared by Mickledore, confirms that this level of job creation is actually less than that achieved over the equivalent period from 1992 to 2014.

Jobs growth over this 23 year period equalled an average 1,573 jobs per annum compared to 1,240 jobs per annum under the LEP devolution proposal. Given this higher rate of job creation in the past, (which would equate to 39,325 jobs over a 25 year period), further scenarios considering higher levels of jobs growth should be considered.

The 2016 SHMA Addendum concludes that the job growth proposed by the LEP would increase the housing requirement to **982 dpa**, and this is rounded up to a minimum net housing requirement figure of **1,000 dpa** in the Scope and Contents Document. The calculation of the jobs growth scenario is based upon the same assumptions used within the OAN calculation referred to in Question 2 and therefore it is likely that a further uplift may be necessary here as well.

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

Whilst we welcome the Council's overall approach to assessing housing supply as set out in Urban Capacity Statement (October 2016), with reference to the 2016 SHLAA (summarised in the 2015/2016 Annual Monitoring Report); we have not assessed the deliverability of individual sites within the supply at this stage. We also make some specific comments below on the methodology and calculations used in these documents.

The Urban Capacity Statement calculates the total capacity for housing within the borough on existing urban sites and greenfield sites outside the Green Belt. This calculation adds the 2016 SHLAA figure for the period 2016-2031, the predicted windfall figure for the same period, and the additional capacity identified through a masterplanning exercise of the town centre commissioned by Warrington & Co. The calculation and resultant capacity is set out below:

10,806 (SHLAA Total) + 3,460 (Additional Masterplanned Capacity) + 960 (Windfall) = 15,226

This suggests that approximately 5,000 dwellings will need to be accommodated via a release of Green Belt land in order to meet the target of delivering 20,000 new homes in the next 20 years. We agree with the overall approach, but note several inconsistencies in these figures, which we address in turn

SHLAA Total Supply Figure

Firstly, there is some confusion over the total SHLAA figure, which is referred to as 10,803 in paragraph 1.6, then 10,806 in Table 1; however the 2015/2016 AMR which this figure is supposedly taken from quotes a figure of 10,289 over the period of 2016-2031.

Secondly, it is unclear from the SHLAA and Urban Capacity Study whether any discount has been applied for slippage or under-delivery on sites already benefitting from planning permission, which is an inevitable part of the system, and a lapse rate is commonly applied to the supply in the examination of local plans. Ideally the scale of any lapse rate should be determined locally, but in the absence of any detailed local information, it is common to provide a 10% deduction, and this has been endorsed within several appeal decisions (including the Droitwich Spa Appeals APP/H1840/A/13/2199085 & APP/H1840/A/13/2199426).

We do not apply any discount in our calculations here, as the Council's supply figure in the 2016 SHLAA/AMR does not break down the individual elements of supply in sufficient detail to be able to apply this accurately; however we recommend that this matter, and the existing supply as a whole, is given further consideration before the next consultation.

Additional Masterplanned Capacity (Warrington & Co.)

The masterplanning work commissioned by Warrington & Co, which identifies an additional capacity of 3,460 was a high level exercise, and a more detailed assessment will be required before this figure can be considered to be robust.

Windfall Rate

The windfall figure of 960 is already incorporated in the land supply figure of 10,289 reported in the AMR, so adding this figure separately represents double counting.

Furthermore, this windfall figure is based on a flat rate of 64 dpa based on past completions between 2009/10 and 2014/15. Whilst paragraph 48 of the NPPF acknowledges that this can be a realistic source of supply, it is considered that a flat rate is optimistic and that this rate should fall over time as more sites are picked up through the call for sites and SHLAA processes throughout the plan period. Sources of windfall sites are finite and the expectation that they will deliver a further 960 dwellings over the period 2016 to 2031 are considered optimistic and insufficiently evidenced within the SHLAA and Urban Capacity document.

It is also our view that windfall sites should not be included until year 3, to avoid double counting as most, if not all of those windfall sites delivered in years 1 and 2 will already have planning permission and will already have been included. As such a total of 128 units has been deducted from the supply in the calculation below.



Housing Supply Conclusions

Taking into account the observations listed above, it is our view that the Borough's total housing supply should be calculated as follows:

10,161 (SHLAA + Windfall x 13 years) + **3,460** (Additional Masterplanned Capacity) = **13,621**

Based on this revised calculation, which suggests a maximum supply of 13,621, the review of the Green Belt would have to release land for at least 6,500 new dwellings, to meet the 20,000 dwelling target, which is 1,500 more dwellings than outlined in the Scope and Contents Document.

However, we also note that a buffer should be applied to the total supply requirement across the plan period, to provide flexibility and allow for under delivery from allocations or windfall sites. There are two main reasons for the inclusion of such a buffer. Firstly, the NPPF the housing requirement is a minimum figure in accordance which Local Plans should seek to surpass, and this interpretation has been endorsed in numerous Local Plan examinations. Secondly, as with the lapse rate on permitted sites, it is inevitable that some sites will either under-perform or fail to deliver during the plan period. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. Such an approach is recommended within the LPEG report to Government, with recommendation 40 (at Appendix A) noting that Local Plans should:

"focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF. Reserve Sites represent land that can be brought forward to respond to changes in circumstances."

Adding the recommended 20% buffer to Warrington's current requirement would increase it to 24,000 dwellings, and this figure will rise further should the housing requirement figure be increased, as suggested above in Questions 2 and 4.

Finally, we note that the 2016 SHMA modelled for housing needs for the elderly, concluding that an additional 62 bed spaces per annum were required in Care Homes up to 2037. However, there is no reference to this requirement within the Urban Capacity Study and wider land supply evidence, so this will need to be taken account of within the next consultation, and will increase the housing land requirement still further.

Based on the existing urban capacity this would require at least **10,500 dwellings** to be released from the Green Belt, which would constitute almost 44% of the total supply required over the plan period.



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

It is clear from the available evidence that there is insufficient land within Warrington's existing urban and greenfield sites to meet its own needs for housing and employment land going forward, and this establishes the exceptional circumstances required to release land from the Green Belt.

The Council fully accept this within their Scope and Contents Document, whilst our supply analysis suggests that this land shortage is acute, and may require as much and 10,500 homes to be released, equating to 44% of the total required supply.

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

The three strategic matters are considered appropriate, on the basis that this includes alignment of the housing requirement with the job growth aspirations discussed in question 4.

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?

With regards to this point, it is worth noting that the site has been historically identified as safeguarded land in a draft plan, although the subsequent emergence of the North West Regional Spatial Strategy caused this plan to be revised.

Paragraph 85 of the NPPF confirms that where necessary Local Plans should provide safeguarded land to meet longer term development needs stretching well beyond the plan period, and that local authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period. The NPPF (paragraph 157) also advocates a 15 year time horizon for Local Plans. It would therefore appear appropriate to ensure that the Green Belt boundaries are capable of enduring until at least 15 years beyond the end of the plan period.

This will not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period.

It is recommended that the Council carefully consider the amount of land required to ensure that Green Belt boundaries will not be required to be further amended upon the review of this Local Plan.

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



We have no comments on the Sustainability Appraisal at this stage, but reserve the right to make comments on the Interim SA Report, which is due to be published alongside the draft plan in May 2017 as part of the formal Regulation 18 consultation, as this will identify the effects of the preferred approach and any reasonable alternatives, which are important considerations, indeed the SA process should inform the draft plan so should be completed in advance of the Draft Plan.

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

We are in broad agreement with the flow chart set out in Appendix 2, albeit it represents an over simplification of the process. We would also suggest that reference is made to 'Deliverability/ lead in times' within the right hand box.

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

We do consider the 20-year period to be appropriate; however the Scope and Contents document does not actually confirm the start and finish dates. Officers have confirmed that the plan is intended to run from 2016 to 2036 and so our representations are provided on this basis, but this should be clarified within the next consultation document. We also note that the plan should provide a 15-year time horizon post adoption, in conformity with NPPF paragraph 157, and this will be achievable if the plan is adopted in October 2018 as scheduled.

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 refer to our comments on each of the questions above where we make specific comments on the level of detail and supporting information that we feel should be included in the formal Draft Plan.

Green Belt Assessment

Whilst we welcome the acceptance of exceptional circumstances to support Green Belt release, and support the general two stage approach taken by Arup within the October 2016 Green Belt Assessment, we do have some specific comments on the methodology and findings, with specific reference to TW's land interests at Stocks Lane, which falls within General Area 17 and Parcel WR82. We also take issue with how the parcel has been defined.

Parcel Definition



Whilst we appreciate that drawing parcel boundaries can sometimes be a somewhat arbitrary process, which simply uses existing physical features to divide up the land, we feel that the boundaries of WR82 are incorrect and have prejudiced the assessment of the wider parcel.

In our view parcel WR82 should be split in two. In its current form parcel WR82 is much larger as it extends right out from the west of Penketh to a point where the railway line and A5080 meet, a distance of over 1.5km, which covers the majority of the existing green gap between Penketh and Widnes. As such, this parcel clearly prevents these settlements merging. However, if this parcel was smaller (in line Taylor Wimpey’s land interests and similar in scale to WR83 and WR84 to the north of the railway line) then the smaller parcel would clearly make far less contribution towards this purpose and could be developed without significantly altering the existing gap between Widnes and Warrington.

Green Belt Purpose Assessment

GREEN BELT PURPOSE	ARUP GREEN BELT ASSESSMENT- PARCEL WR82
Purpose 1: to check the unrestricted sprawl of large built-up areas	Strong contribution: The parcel is well connected to the built up area on one side. This boundary consists of garden boundaries which are not durable and will not be able to prevent sprawl into the parcel. Overall the parcel makes a strong contribution to checking unrestricted sprawl.
Purpose 2: to prevent neighbouring towns merging into one another	Strong contribution: The parcel forms a largely essential gap between the Warrington urban area and Widnes whereby development of the parcel would reduce the actual and perceived gap between the towns and would result in the near merging of the towns. Overall, the parcel makes a strong contribution to preventing towns from merging.
Purpose 3: to assist in safeguarding the countryside from encroachment	Strong contribution: The parcel is well connected to the settlement on one side. This boundary consists of garden boundaries which are not durable. The parcel is well connected to the countryside. South Lane and the Liverpool to Manchester railway line are both durable boundaries. The existing land use mainly consists of open countryside. There are hedgerows dividing the parcel and a small number of active farms. The parcel supports long line views and overall supports a strong degree of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment due to its openness and non-durable boundary with the settlement.
Purpose 4: to preserve the setting and special character of historic towns	No contribution: Warrington is a historic town however the parcel is not within 250m of the Warrington Town Centre Conservation Areas. The parcel does not cross an important viewpoint of the Parish Church. Widnes is a historic town however the parcel is not within 250m of its Conservation Areas.
Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.

Justification for Assessment	The parcel makes a strong contribution to three purposes, a moderate contribution to one and no contribution to one. In line with the methodology, the parcel has been judged to make a strong overall contribution. It supports a strong degree of openness and there are non-durable boundaries between the parcel and the settlement which mean that the parcel has a strong role in preventing encroachment into the Green Belt. In addition, the parcel makes a strong contribution to checking the unrestricted sprawl of Warrington and from preventing towns from merging.
Overall Assessment	STRONG CONTRIBUTION

At the outset, we raise concerns with the Green Belt Assessment’s approach to Purpose 5 ‘assisting urban regeneration’, where every parcel is considered to make a Moderate contribution, on the basis that:

“The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.”

In our view this statistic is irrelevant. The key issue here is that the Scope and Contents Document and Urban Capacity have categorically concluded that there is insufficient urban land to meet housing needs going forward, which includes all suitable brownfield and regeneration land, and that this provides the exceptional circumstances for Green Belt release.

In the Council’s view this will require the release of land for at least 5,000 homes (or 25% of the Local Plan target), and in our view as much as 10,500 homes (or 44% of the Local Plan target).

Either way, this confirms that no individual Green Belt parcel is making any contribution to urban regeneration. As such the purpose 5 assessment should be changed to ‘no contribution’ throughout, with an explanation in line with that given above.

We note that the next stage of the Arup Green Belt Assessment is to assess the individual Green Belt sites put forward during the Call for Sites process, however we have provided our own assessment below, presented in a similar format, and this will be developed further within the formal Development Statement:

TWUK’s Assessment of Stocks Lane Site

GREEN BELT PURPOSE	TAYLOR WIMPEY SITE- STOCKS LANE PENKETH
Purpose 1: to check the unrestricted sprawl of large built-up areas	Moderate contribution: The Warrington to Liverpool Railway Line and Farnworth Road form strong physical boundaries which restrict sprawl to the north and south. Whilst the site is open to the west, existing development at Doe Green to the south already and Lingley Green to the north already extend out westwards making this a

	logical extension to the Penketh, infilling and rounding off at the edge of the urban area.
Purpose 2: to prevent neighbouring towns merging into one another	Moderate contribution: The development of the site would not close the gap between Penketh and Widnes as the closest point between the two is already established by development at Doe Green to the south (with an off-set of 1.6km), and this gap would be maintained by the proposed development.
Purpose 3: to assist in safeguarding the countryside from encroachment	Moderate contribution: As with all Green Belt release sites, the development of the site will inevitably result in the loss of some open countryside. However, the railway line and main road provide strong boundaries preventing encroachment north and south, and also ensure that the site is not a particularly tranquil location or one with intrinsic beauty, which is typically associated with open countryside. As such, the site currently serves little function as countryside and its loss would not be unacceptable.
Purpose 4: to preserve the setting and special character of historic towns	No contribution: Warrington is a historic town however the site is over 4km from the Warrington Town Centre Conservation Areas, and the site does not cross an important viewpoint of the Parish Church. Widnes is also historic town however the site is over 4km from its Conservation Areas. There is a Grade II listed Farm (Brookside Farm) at the south west corner of the site, however this is heavily screened by trees, and is already flanked by existing residential development, which ensures that development of the site will have minimal impact on its setting.
Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	No contribution: As noted, the Council fully accept that there is insufficient land within Warrington’s existing urban and greenfield sites to meet its own needs for housing and employment land going forward.
Justification for Assessment	The parcel makes a moderate contribution to three purposes, and no contribution to two. In line with the methodology, the parcel has been judged to make a moderate overall contribution. It has strong physical boundaries restricting sprawl and encroachment to the north and south, and will round off the urban area, without closing the gap between Penketh and Widnes, and will have no impact on historic towns or regeneration objectives.
Overall Assessment	MODERATE CONTRIBUTION

As such, we conclude the Stocks Lane site does not fulfil the 5 purposes for including land in the Green Belt, and combined with the fact that it is a sustainable and deliverable site, it is recommended that it be released from the Green Belt through the Local Plan process to help meet future housing needs. This conclusion is compliant with historic assessments of the site which were sufficient to see it identified in a pre-RSS draft plan as safeguarded land, and the pressing nature of the current need for housing land justifies that the parcel be released now rather than safeguarded for longer term.



Conclusions

Overall we welcome the Council's decision to invite comments at such an early stage of the process, which demonstrates a positive and proactive attitude to engagement.

We also support the alignment of housing and economic growth aspirations to generate a housing target that exceeds that set out in the 2016 SHMA, and the acceptance that exceptional circumstances exist to support Green Belt Release.

However, we have concerns about elements of the evidence base, which will need to be clarified before the formal Regulation 18 consultation takes place.

In terms of housing need, the evidence on market signals and economic growth suggests the housing requirement may need to be increased further.

Moving on to supply, there is double counting in the SHLAA calculations and flaws in the methodology, which suggest that the actual urban capacity is much lower and that additional Green Belt land will need to be released. Indeed, when this supply evidence is combined with the LPEG recommendations on providing a buffer of reserve sites, it suggests that land for up to 10,500 homes will need to be released from the Green Belt.

Finally, these representations confirm that the Stocks Lane site does not fulfil the 5 purposes for including land in the Green Belt, and is a sustainable and accessible site, with no obvious technical constraints preventing its development for residential purposes. As such, it is recommended that the site be released from the Green Belt through the Local Plan process to help meet future housing needs, and we will provide a Development Statement to support this before the formal Regulation 18 consultation in May 2017.

We trust the above representations are clear but should you have any questions regarding the above, please do not hesitate to contact me. Otherwise, please keep us informed of any further consultations on the Local Plan Review and associated documents, using the contact details below.

Yours sincerely,



Graham Lamb
Principal Planner



Encs. Call for Sites Registration Form and Proposed Site Masterplan (ref 1111-TWUK-SK1)





LEGEND

- | | | | |
|--|---------------------------|---|------------------------------|
|  | Green space |  | Primary Access Point |
|  | Existing & Proposed Trees |  | Primary Access Loop |
|  | Residential parcels |  | Secondary Access Roads |
|  | Feature Open Space |  | Key Play Spaces / Public Art |

Stocks Lane
Penketh

Initial Sketch Masterplan
Gallagher Technical & Design Ltd | enquiries@g-t-d.uk

Oct '16
1:2500 @ A3

1111-TWUK-SK1

