

Development Plan Representation – Warrington Borough
Council Local Plan Review

Local Plan Preferred Development Option Regulation 18 Consultation

On behalf of Langtree Property Partners



I. Introduction

Spawforths have been instructed by **Langtree Property Partners** to submit representations to the proposed Preferred Development Option Regulation 18 Consultation (July 2017) and its supporting evidence base, which has been published for consultation from Tuesday 18 July 2017 ending on Friday 29 September 2017.

Langtree have significant land interests in Warrington and are seeking to promote land for employment residential use to the south east of the Warrington urban area. The representations focus primarily on Langtree's residential land interests.

Langtree welcomes the opportunity to engage in the Local Plan Review and look forward to being an active participant in further stages as the plan process evolves.

We welcome the need to review the current Local Plan Core Strategy given the results of the High Court Challenge and the emerging evidence recently prepared, which clearly sets out the Borough's growth ambitions and housing and employment needs to reflect this aspiration. This evidence base will need to underpin the emerging Local Plan Review.

We support these growth ambitions and overall intentions, underpinned by the housing and employment evidence base, aligned with job growth, which recognises the need to identify more housing and employment land in the Borough. However, we do have some concerns which we outline in this Representation, regarding the Council's development trajectory and phasing and the locations of this growth, which may result in a strategy which is not capable of delivering sufficient levels of employment and housing development to meet the objectively assessed employment and housing needs and growth ambitions of the Borough.

In our view, it is imperative that the evidence base used to inform the Local Plan Review applies the correct methodology and approach in respect of growth to ensure the Local Plan Review meets the four tests of soundness, set out in paragraph 182 of the Framework.

We trust that you will confirm that these representations are duly made and will give due consideration to these comments.

Please do not hesitate to contact us to discuss any issues raised in this Representation further.

2. National Planning Policy Context and Tests of Soundness

The Government's core objectives as established through the National Planning Policy Framework (the Framework) are sustainable development and growth. Paragraph 14 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The core planning principles are set out at paragraph 17. These include that planning should make every effort to proactively drive and support sustainable economic development to deliver the homes and businesses that the country needs. Plans should take account of market signals and allocate sufficient land to accommodate development within their area. The key focus throughout the Framework is to build a strong, competitive economy and to deliver a wide choice of high quality homes.

In relation to Local Plan formulation, paragraph 150 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.

In relation to the examination of Local Plans, paragraph 182 of the Framework sets out the tests of soundness and establishes that:

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

This document therefore considers the content of the Local Plan Preferred Options Document and supporting evidence base on behalf of Langtree in light of this planning policy context. This representation comments on the questions detailed within the Consultation Document with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that Local Plan Review is made sound.

3. Response to Questions

Question 1: Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

We strongly support the Council's growth ambitions and the need over the 20 year plan period to allocate sufficient land to achieve high levels of growth, including 381 ha of employment land, which recognizes that land will need to be released from the Green Belt to deliver at least 9000 homes and 252 ha of new employment space.

This is underpinned by a range of evidence which provides a robust case for this need.

We consider that the Mid Mersey SHMA Update – Warrington Addendum (May 2017) provides an appropriate assessment of housing need in the Borough. The purpose of the 2017 SHMA Update Addendum was in response to matters raised during consultation on the Local Plan Review Scope and Contents Document and it now provides an update to the January 2016 SHMA. The Update now ensures the Borough's housing need and economic growth are aligned to inform the development needs set within the Preferred Options Document. We welcome the changes made to reflect up-to-date evidence base which now considers the most recent demographic evidence including the 2014 sub national population projections published by ONS in May 2016 and the new 2014 based household projections published by CLG in July 2016, which replaces the 2012 based projections featured in the last SHMA Update. These up to date projections should be the starting point for assessing housing need, consistent with paragraph 158 of the NPPF. The Plan should however recognize that the proposed housing requirement should only be viewed as a minimum and restrictions should not be put in place which impedes further levels of sustainable growth.

There are a number of factors which may give rise to further levels of growth not clearly set out in the SHMA Update and supporting evidence base. The 2017 SHMA Update currently applies a static commuting ratio over the plan period, based on the current rate of commuting. If however, the Council is successful in achieving the high levels of job growth projected, this could lead to an increased appeal to live within an area in which people work rather than in commuting. If this was the case, this would require an increase in housing provision. The SHMA Update also makes no allowance for an increase in household formation rates (HFR's) and assumes lower household formation rates for younger

households. Assumptions on HFR's should be considered in the context of the recent raft of measures introduced by Government and endorsed by the HBF which are intended to increase opportunities for young people to access the housing ladder, including measures such as Help to Buy and Starter Homes. If an uplift to household formations rates in younger households was increased, to reflect measures to increase access on the housing ladder for young people, this should lead to a further increase in housing need/requirement set out in the emerging Plan. This should be considered in subsequent stages of the Local Plan Review process consistent with the tests of soundness set out in paragraph 182 of the NPPF.

The Preferred Options Local Plan Document also acknowledges that the Government will shortly be consulting on a standard methodology for calculating housing need across the country therefore the housing need will need to be kept under review as part of subsequent stages of the Local Plan. We endorse this approach and the need to reflect any standard methodology that is to be introduced. The government has recently commenced consultation on further measures set out in the housing white paper to boost housing supply in England which will result in changes to the NPPF. This sets out a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth. It includes a standard method for calculating local authorities' housing need and new 'statement of common ground' to improve how local authorities work together to meet housing and other needs across boundaries. It also includes a 'Housing need consultation data table' setting out the housing need for each local planning authority using the proposed method, how many homes every place in the country is currently planning for, and, where available, how many homes they believe they need. This will need to be considered in detail as part of the next stage of the Plan process and the Council's total housing requirement across the Borough.

The SHMA Update revises the economy activity rates resulting in an OAN increasing from 839 homes per annum to 955 per annum which Langtree supports. The SHMA Update also considers the impact of the devolution proposal to create 31,000 jobs in the Borough from 2015 to 2040 (1240 jobs per annum), which would equate to 28,520 additional jobs over the SHMA period to 2037. This means that the housing requirement to support the level of job growth in the devolution bid increases from 984 homes per annum to 1,113 homes per annum. Langtree support the proposed housing target set out in the Preferred Options Document and consider the alignment of the housing requirement with the LEP Strategic

Economic Plan (SEP) is realistic and justified and underpinned by the Council's Economic Development Needs Study (ENDA) undertaken in October 2016, which remains the most up to date evidence on employment needs in the Borough. This approach is consistent with paragraph 158 of the NPPF and PPG (ID 2a-018).

Projecting employment growth in Warrington in order to determine the employment land targets in the emerging plan is important. The Council's evidence set out in the 'Review of Warrington Employment Targets to 2040' outlines the 'pipeline projects' planned over the plan period and beyond. The SEP correctly embeds the devolution bid figure, rather than the Northern Powerhouse figure. We consider that SEP assumptions on growth are sound and based on an understanding of underlying trend growth and what can be achieved through a reasonable understanding of the development pipeline. We recognize logistics consistently drove growth in the Borough between 1998-2014 (Omega) and the forecasts set out in the evidence base forecast high jobs growth in distribution, transport and storage sectors. The Local Plan Preferred Options Document rightfully identifies land in appropriate locations to facilitate further growth in these sectors which we welcome.

In summary, we support the projects and programmes required to deliver Warrington New City. We also consider that the SEP targets for Warrington are sound and appropriate to plan for economic growth in the emerging Plan. The Northern Powerhouse numbers are far from a reasonable forecast for local growth and there is insufficient evidence and a lack of certainty regarding the Northern Powerhouse programme at present, therefore we agree that this should not be used as a basis for forecasting employment growth figures in the Plan.

We consider that this level of evidence base is consistent with the requirements of the Framework, paragraphs 17, 158 - 161 and provides the most up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area, taking full account of the relevant market and economic signals, required to inform the allocation of sufficient land to accommodate development within the area.

The Local Plan Preferred Options Document now translates this need into the land provision targets set out in the preferred options.

Question 2: Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?

We broadly support the work undertaken by the Council in their Urban Capacity Statement which has been prepared to inform the Local Plan Preferred Options Document. The Urban Capacity Assessment draws on the EDNA, SHLAA and identifies the significant additional capacity that can be delivered through the regeneration plans and masterplanning work for the Town Centre, Warrington Waterfront and wider Inner Warrington. This produces a figure of 7,558 units over 20 years and an overall capacity of 15,429 homes over 20 years. In terms of employment land, the masterplanning work undertaken by the Council relating to the Town Centre, Inner Warrington (including Waterfront) has identified an additional 26.58 ha of employment land over the next 20 years, which confirms an overall capacity for 129.77 ha of employment land over the next 20 years.

The Preferred Options Document does place considerable emphasis on maximizing development within the existing urban area in addition to Green Belt release. Whilst we support the principle of this approach, the Council need to be satisfied that the levels of delivery within the urban area set out in the Preferred Options Local Plan Document (particularly in the first 10 years of the plan period) are achievable, justified and effective consistent with the NPPF tests of soundness. We are aware of a number of Waterfront sites which are reliant on significant infrastructure investment and Town Centre sites which are currently occupied by alternative uses. The deliverability of some of these sites within the timescales set out raises doubts over the current trajectories set out in the urban area, and the ability to meet the current housing requirement over the plan period set out in the Plan. Despite the Council's intention to maximize the capacity of the existing urban area, it is abundantly clear that if Warrington is to meet the development needs arising from its growth aspirations, it can only do this through the release of Green Belt land to release a minimum of 8,791 homes and 251 ha of employment land. If land cannot be delivered within the urban area based on the trajectories set out in the Preferred Options Document, then we consider that land currently identified as safeguarded land should be allocated for further housing and employment to ensure the plan is made sound.

In terms of the assumptions made by the Council in calculating their housing and employment land requirements we would like to comment as follows:

Whilst the inclusion of a buffer in the housing land requirement applied for flexibility is supported in principle, consistent with the requirements of the NPPF, the 5% flexibility currently applied in the Preferred Options Document over the plan period may not be sufficient to account for slippages in any key development sites or as a result of delays to delivery of key infrastructure. If the housing requirement is to be set as a minimum then 5% flexibility may not be adequate.

The Council makes cursory reference to the Fiddlers Ferry Power Station, which is currently operational, coming forward as a major brownfield development site in the plan period. With such uncertainty regarding its closure and its deliverability as a possible development site it would be wrong to make any allowances for this site as either an allocated site or apply sufficient 'flexibility in the land supply' in the emerging Plan.

The assumptions made by the Council in the 2017 SHLAA, which sets out to achieve 75% net developable areas across all sites above 2 ha might be challenging on some larger strategic allocations in the key growth areas identified in the Preferred Options Document. On much larger strategic allocations, net developable areas may drop to around 50%. As further masterplan work is undertaken by the Council in the strategic growth areas, these assumptions will need to be tested and where appropriate consideration may need to be given to drawing on more safeguarded land if required to meet the overall housing target.

Question 3: Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

We support the Council's growth aspirations set in the Preferred Options Document which can only be met with the release of Green Belt land to release a minimum of 8,791 homes and 251 ha of employment land, which is set out in Table 1 and Table 2 of the Preferred Options Document.

We also support the provision of safeguarded land within the Preferred Options Document. In order to be consistent with the NPPF and ensure safeguarded land will meet the longer term development needs stretching well beyond the plan period, the Council should give consideration to identifying sufficient safeguarded land to match the proposed plan period of 20 years. This would provide certainty for all stakeholders in terms of likely growth locations beyond the end of the plan period to ensure that this plan is justified and positively prepared in accordance with paragraph 182 of the NPPF.

The Preferred Options Document paragraph 4.20 states that sufficient safeguarded land will be identified to meet development needs 10 years beyond the plan period, however Table 3 states a 9 year requirement, based on the OAN at a density of 30 dph and 75% net developable area. The reasoning for using 9 years (rather than 10) is that 15 years can be made up by including the 5% flexibility/buffer, which is equivalent to 1 years supply and the 20% buffer allocated for employment land, which would provide a further 5 years. When measured against the OAN, the Council considers this provides 15 years supply. If the time frame is 15 years we would question again why it should not just mirror the plan period. Furthermore, if the 5% housing buffer and 20% employment buffer are used to ensure housing and employment land requirements are met in the plan period, they will not also be available if required during the plan period for future development which is the intention of safeguarded land. We have already raised similar comments in response to Question 2 regarding the assumptions on net developable areas and flexibility provided by a 5% buffer which also puts further uncertainty on the ability to meet the 'minimum' housing requirement. If this buffer or assumptions made on net developable areas are not flexible enough, this may require more housing land to be identified drawing on more safeguarded land in the strategic growth areas to meet the overall housing target.

Paragraph 4.24 of the Preferred Options Document identifies a similar urban area to Green Belt split (64% to 36%) for safeguarded land beyond the plan period to the total housing requirement ratio. For employment 29% is within the existing urban area and 71% is proposed on Green Belt land. The Preferred Options Document also makes further references to the Fiddlers Ferry site, which if made available could change the safeguarded land required figures again, given the delivery of this site will maximize the development of the urban area. The availability and deliverability of this site has not been justified by any level of evidence base that we are aware of. If this site within the urban area was identified in the plan and not delivered it would put further reliance upon safeguarded land outside the urban area.

We acknowledge that the Council are only consulting on a Preferred Options stage, however we expect that further consultation stages, including the Draft Local Plan should include a specific policy with triggers to identify when the safeguarded land would be released through a plan review. This should acknowledge the 'housing delivery test' put forward in the Government's recent 'Housing White Paper – Fixing our broken housing market', which states action should be taken if delivery falls below 95% of the annual

housing requirement set out in a plan. We would endorse a policy with triggers requiring the release of safeguarded land if the plan was failing to deliver on its housing requirement.

We broadly support the extent of safeguarded housing land identified in the Garden City Suburb illustrated in the South Warrington Urban Extension Development Framework, north of Knutsford Road, which is a logical extension to this key growth area south of the Borough and creates a new long term defensible boundary to the Green Belt created by the M6 and M56. The preferred locations for safeguarded land and the extent of these areas will be addressed in further comments to questions pertaining to the preferred development options.

We support the extent of Green Belt land in the south east of the Borough which needs to be released to meet the Council's growth aspirations set out in the Preferred Options Document.

The Green Belt Assessment Final Report (October 2016) and Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites (May 2017) maintain that land parcels (site references: R18/106, R18/110, R18/112, R18/114) allocated for residential and employment development as part of the Garden City Suburb Development Option make weaker contributions to the purposes of the Green Belt resulting in a 'moderate contribution' scoring within the Assessment. We agree with the sentiments of this Assessment and maintain Langtree's position, made at the Scoping and Contents Consultation Stage of the Plan, that stated that the release of the land required to deliver the Garden City Suburb would promote the original principles of the New Town Agenda and historic context of the Green Belt which focused on outward expansion to the south and south east of Warrington.

The Garden City Suburb is within a wide gap between the Warrington urban area and Lymm which is already separated by the M6; therefore it does not make any significant contribution to preventing towns from merging (purpose 2). The land parcels make a weak contribution to purpose 3, which recognizes that the M56 and M6 provide more durable boundaries which would prevent encroachment beyond the parcels if this land was to be released from the Green Belt. The land makes a weak contribution to purpose 4, given there is a large separation between the Warrington Parish Church and the land and it provides a moderate contribution to purpose 5 with a small percentage of brownfield land which assists in urban regeneration. We disagree with the Arup's Site Assessment of the

land parcels which are identified as safeguarded land, north of Knutsford Road, which states that these make a strong contribution to the Green Belt in this location. We consider that this parcel makes a weaker contribution to the Green Belt for the reasons expressed above.

The Garden City Suburb Development Option represents the most sustainable and deliverable option to achieve housing and economic growth consistent with paragraph 84 of the NPPF and its current Green Belt designation and existing boundaries should not be a constraint to identifying this land for release. This option, including the safeguarded land maintains a careful balance between minimizing impact on the openness of the Green Belt with the need for sustainable development. It is also entirely appropriate in our view to balance the functions of the Green Belt with the need to allocate more land for development in suitable and sustainable locations for development.

The Green Belt Assessment and identification of land for Green Belt release should place more emphasis on meeting identified development requirements and sustainable patterns of development, in accordance with the policies of the NPPF; balancing these requirements against the existing roles of the Green Belt; considering ways in which development can mitigate the loss of open areas and enhance the remaining parts of the Green Belt through landscaping; and forming new Green Belt boundaries that have a realistic prospect of enduring beyond the next plan review. We consider the current Garden City Suburb Concept adopts this approach identifying appropriate new Green Belt boundaries and appropriate levels of open space and green infrastructure, including a Country Park to mitigate the loss of other areas of green space.

Question 4: Do you agree with the new Local Plan Objectives?

We broadly support the strategic objectives of the Local Plan which reflect the Council's New City development aspirations, confirming the level of housing and economic growth, infrastructure necessary and Green Belt release required to meet these growth targets in a sustainable manner.

If the strategic objectives are met through policies and land allocations in the emerging Plan, it will provide a comprehensive plan for Warrington with new sustainable communities, appropriate in scale and location to unlock the necessary strategic infrastructure to support growth required. Without a comprehensive planned solution to meet this level of growth,

development and infrastructure will be delivered piecemeal putting additional pressure on existing infrastructure.

Question 5: Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

The Council has correctly identified and assessed a number of high level spatial options, through Stage 3 of their work towards a Preferred Option set out in the Consultation Document drawing on area profiles and growth scenarios for individual parts of the Borough, which have been assessed through a SA/SEA Report. We have reviewed the settlement profile for South Warrington (including Grappenhall and Appleton Thorn) which concerns Langtree's land interests and strongly support the fourth growth scenario option which seeks to provide a minimum of 6000 homes as part of a New Garden City Suburb which also recognizes the major employment site proposed at the junction of the M6 and M56.

Following an assessment of growth scenarios for each area profile, the Council identified three high level options for the spatial distribution of new development. We recognize there are merits to each broad spatial option (particularly option 1 and 2) which all contribute to the delivery of Warrington New City, with managed Green Belt release. We support the principle of the Council's preferred option 2 which recommends the majority of Green Belt release adjacent to the urban areas with incremental growth in outlying settlements. The scale of growth would be in-line with the devolution bid, with a total requirement of 24,220 dwellings over the plan period; 8791 of which would need to be delivered on Green Belt land.

Question 6: Do you have any comments to make about how we've assessed different options for the main development locations? /

The options for the main development locations (Stage 4 of the Preferred Options Local Plan process) identifies five main development locations.

We support the stage 4 assessment of the main development location which has been assessed against the Plan Objectives and has been subject of a Sustainability Appraisal (SA).

We support the Council's preferred Option 2 – a Garden City Suburb of approximately 6,000 homes and an urban extension to the south west of Warrington, which performs well

against the strategic Plan Objectives and when tested through SA/SEA. Notwithstanding this general level of support for this Option, we consider there is also merit in Option 1 as we are concerned over the delivery of the Western Link which is imperative to deliver the South West urban extension area. We are also concerned that the South West urban extension has significant conflict with the objectives and purposes of the Green Belt given the strong performance of the Green Belt in the western part of the Borough, both at General Area and individual parcel / development site level. These are all concerns raised through the Council's own SA Report.

The Garden City Suburb development concept and its safeguarded land have less impact on the Green Belt and the Green Belt Assessment confirms the Garden City Suburb land performs weaker when assessed against the purposes of the Green Belt with the M6/M56 providing a new defensible boundary to the Green Belt which will endure.

In summary, we consider that main focus for development should be within existing urban areas (including the Town Centre, Waterfront and Southern Gateway) and the Garden City Suburb to the south of the urban area. We consider that any growth in the South West and outlying settlements should be restricted so that it does not undermine the delivery of these key regeneration areas and Garden City Suburb priorities. Further comments on the Garden City Suburb development concept and South West urban extension will be made under questions 11 and 12 and will refer to respective Framework Plan Documents prepared by AECOM on behalf of the Council which develops each concept in further detail.

Question 7: Do you agree with our Preferred Development Option for meeting Warrington's future development needs?

We support the Preferred Option and the particular emphasis on the Garden City Suburb to deliver the scale of growth required which in turn aids delivery of the necessary strategic infrastructure.

We agree in principle with the development trajectory which will deliver the required number of homes in the Borough. These delivery rates are achievable but challenging and will require multiple house builders to be on site concurrently. The principle of a stepped approach will allow for the key enabling infrastructure to be delivered with the build out rates getting higher over subsequent years. The development trajectory will need further iteration in later stages of the Plan process, once detailed assessments are undertaken to

confirm programming of any infrastructure required to deliver this level of development. At this stage in the Plan process, with the evidence base available, this can only be regarded as an indicative trajectory.

Question 8: Do you have any comments to make about our Preferred Development Options for the City Centre?

We recognize that the existing urban area is an integral component of the Local Plan strategy which will see delivery of the Council’s housing and employment requirement within these areas, including the Town Centre. In order to meet the growth targets and development trajectory set out in the Preferred Options Document, the Council relies heavily on higher density development in the Town Centre, provision of significant new infrastructure; and that all sites which have been identified are made readily available to be consistent with the current trajectory. The proposed Western Link Road is critical to the delivery of much of the land which is to come forward within the Town Centre. Evidence will therefore be required as part of future stages of the Plan to demonstrate the sites are available and achievable to meet with the current delivery rates, otherwise the plan will be unsound.

Langtree welcomes the recognition and significance given to the Southern Gateway in the Overall Phasing Plan for the City Centre which demonstrates the delivery of large developments parcels for commercial, mixed use and residential development in the first five years of the Plan, which will contribute towards the Council meeting their housing and employment requirement. The Southern Gateway will deliver a total of up to 900 dwellings towards the total housing requirement over the plan period.

Question 9: Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?

We support the Council’s focus within the Preferred Options Document to follow the same approach to the wider urban area to that set out in the adopted Local Plan Core Strategy, with Birchwood, Omega and Woolston continuing as strategic employment locations and to deliver the programme of infrastructure improvements to the road and public transport network. We support the principle of this approach which demonstrates consolidation of employment in existing urban areas in addition to proposed new strategic employment sites at key sustainable locations, as proposed as part of the South Warrington Urban Extension / Garden City Suburb.

Question 10: Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?

We support the principle of this approach and Preferred Option; however we do consider that it is over reliant on the delivery of the Western Link Road. The preferred route of this link has recently been confirmed but all the funding is not secured, which raises significant concerns regarding the timing of its delivery, particularly 728 houses in the first five years of the plan period, as set out in the development trajectory. The Western Link Road when confirmed and delivered could also affect the housing capacity of this strategic location. If these housing targets cannot be met consistent with the development trajectory in these broad locations, they should be re-distributed to deliverable sites elsewhere in the Borough.

Question 11: Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?

We support the Warrington Garden City Suburb concept, including the general principles of this sustainable urban extension and the extent of land required, which will deliver a significant part of Warrington's overall employment and housing requirement and need over the plan period. This will deliver 7,274 houses (around 6,324 of these from land currently within the Green Belt (based on the Council's development trajectory) and 116.80 ha of new employment space.

The Garden City Suburb provides sufficient land to meet the Borough's development needs and should be the main location for growth alongside the Town Centre, Waterfront and Southern Gateway.

It is clear that to deliver this level of development within the Borough, this will require incursion into the Green Belt. This location to the south east of the Warrington urban area has been assessed as part of the Council's Green Belt Assessment, which confirms that large areas of this land currently only make a moderate / weak contribution to the five purposes of the Green Belt and the new proposed Green Belt boundaries will provide a more permanent defensible boundary which will endure. A detailed appraisal of the Green Belt Assessment and the five purposes of the Green Belt in the context of this development option is provided in our response to Question 3. Langtree has significant land interests in the south east of Warrington on the land which comprises part of the Warrington Garden

City Suburb and would welcome the opportunity to work in collaboration with the Council and other key landowners to evolve the detail of the development concept and masterplan contained within the Local Plan Preferred Options Document and South Warrington Urban Extension Framework Plan prepared by AECOM on behalf of the Council.

This will enable the Council to continue to evolve the development principles of this urban extension consistent with good practice for masterplanning and delivering garden city suburbs, built on a cogent planning case and a development trajectory which is deliverable and based on market realities to ensure that the urban extension reaches its full development potential. It is imperative that the necessary infrastructure is in place to deliver sustainable levels of growth and equally that sufficient land is made available to help to fund this infrastructure.

Whilst we support the broad concept of the Warrington Garden City Suburb as a preferred development option we have a number of comments regarding the phasing of the residential development and the level of safeguarded land which is provided in the South Warrington Urban Extension (SWUE) Framework Plan prepared by AECOM on behalf of the Council. We also seek further clarification as to the status of this Framework as it is unclear whether this forms part of the Regulation 18 Consultation Document or whether this is supporting evidence base?

Phasing of Proposed Residential Land

We support the minimum amount of housing development identified for delivery in this development option and the comprehensive masterplan approach which is borne out of the principles of a Garden City Suburb which requires this extent of land to achieve this development concept. However, we object to the trajectory set out in Table 19 of the Preferred Options Local Plan Document and the Phasing Plan in the (SWUE) Framework Plan.

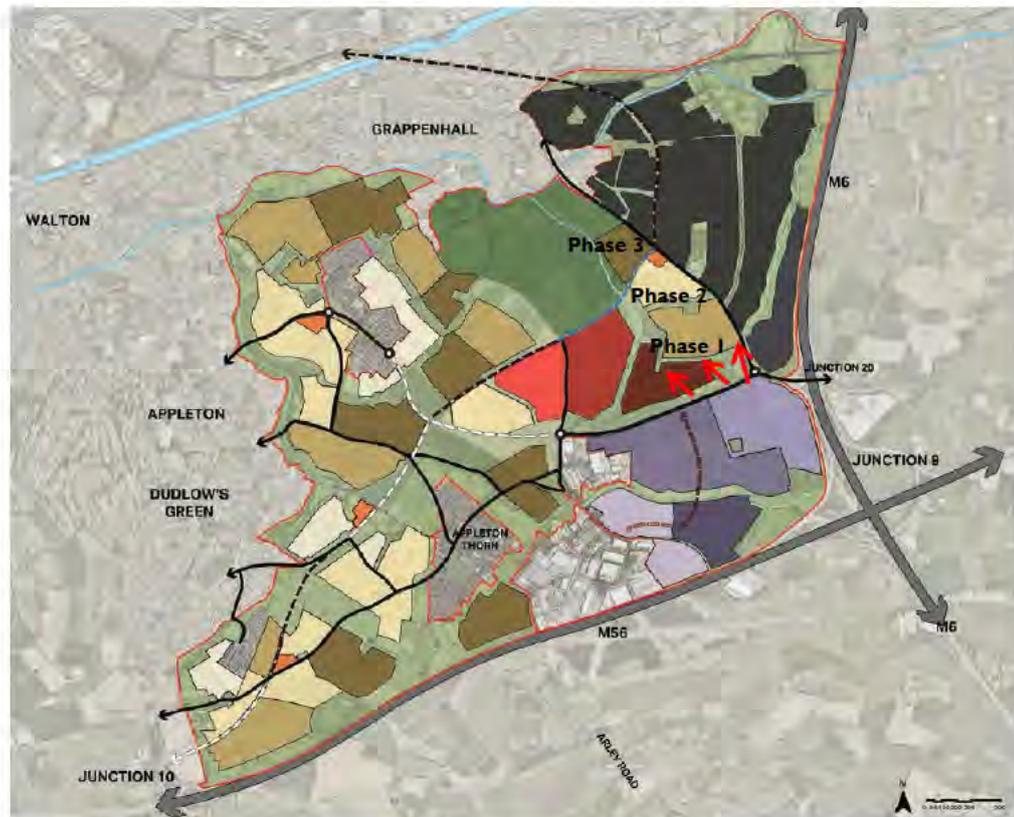
We recognize that appropriate community, social and road infrastructure needs to be in place to deliver this level of housing and employment development. We do not consider that it is appropriate to restrict the release of Green Belt land within the first five years. We consider that some Green Belt land could be made available and delivered in the first five years of the plan with improvements to necessary junctions on the road network without construction of the first phase of the new strategic link road, identified in AECOM's Framework Plan Fig 3.6 and Phasing Plans Fig 4.5.

We consider that it is inappropriate at this stage to identify a phasing restriction. Further detailed work needs to be undertaken on highway and other social infrastructure capacity before any phasing restrictions are justified.

At present residential cell C1 (162 dwellings) is identified in the AECOM Completion Phasing Plan Fig. 4.5 as part of Phase 2 (years 5-10), alongside 30 ha of employment space on land Langtree are promoting, with phase 3 bringing forward residential cell C2 (194 dwellings) and a further 46 ha of employment space.

We object to the sequence of this indicative phasing plan and schedule. There should be no phasing restrictions on employment land at all and it is too early to prescribe phasing restrictions of the housing land until further work on availability of land and funding of infrastructure is completed. The proposed phasing plan currently identifies the delivery of residential cell C2 within phase 2 (5-10 years). This delivery appears to be in conjunction with a second phase of the 'Howshoots Link Road', but there is no evidence of why this is justified.

We consider that Plots C1, C2, C3 and the Western District Core area should be considered as a district neighbourhood with appropriate delivery of this area developed in conjunction with Langtree. It would be more logical to bring forward C3 (326 houses) as a first phase of any development served from the A50 Knutsford Road, rather than delivery of C1 in isolation. Residential cell C3 occupies a strategic location closer to the main road network and existing Cliff Lane / Grappenhall Lane roundabout and the M6/M56 Interchange and is located in close proximity to the proposed strategic employment site. Residential development in this location in the earlier stages of the plan period will deliver a strong sustainable development hub on a key transport interchange which will follow a more logical pattern of development, in closer proximity to the proposed employment space and District Core with later phases spreading north, proceeding with delivery of C2 and C1. The illustration over the page illustrates the revised sequence and phasing of these cells. The red arrows illustrate the logical spread of development from the strategic employment site which creates a sustainable development hub.



Phase 3 of the Completion Phase Plan Fig 4.5 currently identifies the delivery of a new strategic road in years 10-15, which arks through land identified as a safeguarded land in the Plan. This is the third phase of the 'Howshoots Link Road', and proposes to construct a new road link on the old disused railway line, which will need to cross the Bridgewater Canal and the Manchester Ship Canal. This is a significant section of infrastructure, which crosses two waterways and swathes through land identified as safeguarded land. Unless significant public funding is available for this road link it is highly unlikely that this road could be delivered without development to cross enable this. If this road link is necessary to create the required capacity on the road network to facilitate development in the Garden City Suburb to meet the Council's housing and employment requirements, serious consideration should be given to extending the housing allocation in place of the safeguarded land to facilitate delivery of this important infrastructure.

On this basis, we consider that this residential trajectory and phasing strategy should be revised in this context and considered in further detail as part of future iterations and stages of the Local Plan. This should be based upon further evidence of the delivery and timing of

infrastructure. There has currently been no Multi-Modal Transport Model to enable the Council to understand local and Borough wide transport impacts arising from all the development planned. Only once this is completed will the Council be able to confirm the infrastructure required and confirm appropriate phasing of any development.

We would be willing to work collaboratively with the Council to develop a more logical phasing strategy.

We consider that the current level of detail is too prescribed for this stage of the Plan process. We would expect any detail associated with phasing of land to developed at Draft Plan stage with the development of detailed policies. It is too premature at this stage of the Plan process to state that there no residential development on the land currently identified as Green Belt can come forward until the first phase of the new strategic road link is complete.

Notwithstanding the comments and objections regarding the phasing of this residential land, the broad design principles associated with the concept are supported.

We support the broad disposition of uses within the development concept, illustrated in Figure 7 of the Local Plan Preferred Options Document and the conceptual approach underpinned by good practice development principles and guidance on Garden City design which seeks to encourage low density sustainable urban extensions embedded in a strong landscape framework which balances built development with greenspace.

In summary, we consider that further detailed highways assessment needs to be undertaken to support the Council proceed with the next stage of their plan. This will inform a revised development trajectory for delivery of the residential land in the Garden City Suburb. This should form part of a criteria based policy in the Draft Plan which relates to the Garden City Suburb strategic urban extension site, which requires the land to be developed in accordance with a detailed masterplan and any triggers if necessary regarding the delivery of important infrastructure. Each planning application or the delivery of each development area will need to be supported by a Transport Assessment which will confirm the impact of this level of development on the highway network and where necessary any mitigation or highway improvements which will be required to support this level of development.

District Core

AECOM's Framework Plan Fig. 3.6 currently identifies a District Core of 55 ha, located north of Grappenhall Lane, located in the centre of the three residential hubs and employment land. This concept is also illustrated on the land use concept plan Fig.3.2. We recognise this is an optimum location to provide a multi-functional District Core to serve the local neighbourhood's. We understand that this area will include a new secondary school, 4 new primary schools, district centre, health centre and leisure and recreational facilities. Table 3.1 provides a land use breakdown for the District Core. This identifies 2.5 ha for a primary school use, which would not be sufficient to accommodate three further primary schools. It is unclear from the Framework Plan or supporting information where the other three primary schools discussed in the Council's Preferred Options Local Plan would be located within the Garden City Suburb as they have not been identified on any Plan. If these primary schools are to be absorbed within any of the other neighbourhood areas that they serve, this will affect the number of residential dwellings currently calculated in each development cell and will have a consequential impact on the total number of dwellings proposed within the Garden City Suburb.

The land use breakdown table Fig 3.1 identifies a Commercial / District Centre of 11.5 ha and neighbourhood hub, including sports pitches of 30 ha and Country Park of 84 ha. There is no further fixed details relating to the breakdown of the District Core within the Framework Plan. We support the principles of a Garden City Suburb which advocates the need to create sustainable development within a strong landscaped framework, however we have concerns regarding these land use breakdown assumptions and the need for the level of commercial/retail land identified. Similarly, the land dedicated to a neighbourhood hub, including sports pitches which will overlap with some of the functions and uses identified within the 84 ha Country Park. We consider that the area of land identified as District Core is too large as it would be more appropriate to utilize part of the Country Park for playing fields. This would integrate the District Core and Country Park more effectively and create a multi-functional greenspace. We therefore consider that the eastern land parcel shown as District Core would be better identified for housing, using the existing stream as the boundary between the uses. We would recommend that further assessment of the land required for community infrastructure is undertaken as part of the next stage of the plan and redefine the District Centre and neighborhood hub within a tighter core.

Safeguarded Housing Land

Although we have concerns regarding the housing trajectory and phasing of residential development in the Garden City Suburb, we support the development capacity of this Garden City Suburb concept and the basis for these assumptions which are based on a gross density of 20 dwellings per hectare (dph).

We recognize this is below the standard green field assumption contained in the Council's SHLAA, which is 30 dph, however 20dph is consistent with the principles of the garden city movement which encourages low density development. A fundamental element of Garden Cities and Suburbs, specified by their leading advocate Raymond Unwin in 1912, was low residential density.

The Council has also assessed the potential capacity of the Garden City Suburb if the standard SHLAA density of 30dph is applied. This would increase the capacity of the land by 1000 dwellings. The Council also confirms that if the density of 30dph was applied they may rebalance the land to be allocated for residential development and safeguarded land.

We strongly object to the application of 30dph. We also strongly object to any rebalancing of currently identified housing land to be reserved as safeguarded land. This would mean the area comprising development parcels C1 to C3 and a section of the District Core would become safeguarded land as opposed to being allocated and land east of Knutsford Road would no longer all be needed as safeguarded land.

This rebalancing of land would compromise the principles of a Garden City Suburb and the comprehensive approach to masterplanning of this urban extension. It would prejudice the ability to plan comprehensively, fund and deliver infrastructure and hence deliver the Garden City Suburb Concept. It would also reduce the level of landscape and greenspace around the neighbourhoods that are fundamental tenant of the development concept.

We consider that it is imperative that the whole area of the Garden City Suburb currently proposed to be allocated in the South Warrington Framework Plan prepared by AECOM on behalf of the Council is maintained, irrespective of the final density chosen. A reduction in the overall area would risk compromising the principles of this Garden City Suburb. If the Council consider that the Local Plan would allocate too much land (based on a higher density assumption) then it should be the South West urban extension and the outlying settlements that are safeguarded not the Garden City Suburb as this development concept

should be considered as the key priority (in conjunction with the regeneration of the urban areas for housing).

This proposed option would retain the general extent of the area currently identified in the Garden City Suburb development option, even if the capacity of development was increased to 30dph. This approach would ensure the garden city principles are not undermined. This land still provides the most appropriate location for this scale of urban extension and adopts the original principles of the New Town Agenda and historic context of the Green Belt which focused on outward expansion to the south and south east of Warrington. It is clear from the Green Belt Assessment (July 2017) and Langtree's own assessment that the land only makes a weak to moderate contribution towards the five purposes of the Green Belt. The M56 and M6 provides a clearly established defensible Green Belt location, providing a sustainable location for this development.

Rather than compromise the Garden City Suburb approach, the Council should consider safeguarding or remove less land from the Green Belt in other strategic locations, such as the proposed South Western Warrington Urban Extension and outlying settlements identified in the Preferred Options Local Plan. The scale and development capacity of the South Western Urban Extension could be re-evaluated and land to be allocated within this urban extension rebalanced to reflect the contribution parts of the site make to the functions of the Green Belt; the development constraints this land possesses; including the COMAH zones and reliance on the Western Link Road which severely restricts the level of development which could take place in this area, particularly before traffic improvements are made and the Western Link is delivered. This is discussed further in response to Question 13.

In summary, we support the current extent of land required to be released from the Green Belt, including safeguarded land to deliver the Garden City Suburb Concept Option. It identifies an appropriate level of development, which will deliver the requisite infrastructure adopting appropriate development and design principles. Any reduction in this level of development or land required as a result of increasing the density to 30dph would compromise the principles of this Garden City Suburb concept. Whether the Council increase the density or apply a range within the Garden City Suburb, the extent of the area currently illustrated on the development concept, which creates new permanent boundaries to the Green Belt should be maintained in any proposed allocation in the emerging Plan.

Question 12: Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

As already outlined, we have concerns regarding the delivery of 1,831 dwellings within this urban extension to the south west of the Borough. This land is severely constrained by the existing Chemical Works north of the Ship Canal and the middle COMAH zone parts of the site fall within which restricts the capacity of the site. AECOM recognize that building residential development in and on the edge of these zones reduces capacity and the recent planning application at Carrington Village in Trafford is only able to deliver at a density of 26.5 dph. Despite these limitations the Plan has not been conservative and has sought to apply a density of 28 dph. The Green Belt in this location also makes a stronger contribution to the purposes of the Green Belt.

We consider that the South West urban extension should be concentrated within a tighter urban core which reduces the extent of development required for Green Belt release. Land to the south of this development option should instead be identified as safeguarded land.

The major concern with the reliance on delivery of this urban extension to meet the Council's housing requirement is its dependence on the delivery of the Western Road Link and the location of this road through the site. Whilst a preferred route for the Western Link Road has been chosen, it has not yet been formally designed. The form and scale of development in this urban extension could change once the precise alignment of this road is agreed. There is also no certainty at this stage whether the link road can be delivered and if funding is secured when it will be delivered.

The Council have recently completed a public consultation exercise, presenting six alternative alignments, four of which commence within the site from the A56. Feasibility work undertaken by the Council suggests that the cost of these options range from £120m and £250m. At this stage, there is currently no funding for this road, only an award of funding by the Department for Transport (DfT) to develop the business case for a potential new link road (Warrington Western Link). The timeline presented in the Council's consultation document suggests that if funding for the link road was awarded in April 2018, construction would then only begin in "early 2020's".

This raises fundamental concerns, given the Preferred Options Local Plan Document suggests the link road needs to be completed prior to any significant development taking

place in this urban extension. Less weight can therefore be attached to the development trajectory and capacity of this urban extension detailed in the Preferred Options Local Plan. The Plan cannot currently rely on all of this urban extension as a suitable and available preferred option to deliver 1,831 homes. The Preferred Options Local Plan currently presents two development concepts, Option 1 with Western Link omitting a residential cell with a capacity of 74 dwellings to facilitate the link and Option 2 without Western Link, including the residential cell with capacity for 74 dwellings. Despite the two options being presented, it is evident that without the link, the Council have yet to assess or confirm what alternative traffic improvements will be needed to facilitate this scale of development, other than to state in the Preferred Options Local Plan that “...this will require a greater understanding of the traffic improvements required to facilitate development of the site...” and “That this may require significant upgrade to existing junctions...” which will need to be completed prior to any significance development taking place within this urban extension.

Until such time that further detailed highway capacity assessments are undertaken, and funding and or the delivery of the Western Link is more certain, the Council cannot be satisfied that this level of development in this location can be delivered, therefore it is too premature to include all of this land within a development option.

Question 13: Do you have any comments to make about our Preferred Development Option for the development in the Outlying Settlements?

We recognize the need for some development in the outlying settlements to support incremental growth in these outlying parts of the Borough, however the extent of development and balance between settlements clearly needs further consideration as part of subsequent stages of the Local Plan, following further technical assessments. If settlements cannot sustain the levels of growth outlined in Table 22 of the Council’s Local Plan Preferred Options Document, these housing numbers may need to be rebalanced providing further housing in the existing urban area of Warrington and proposed urban extension south east of Warrington. We support a limited level of growth proposed in Lymm, which is a key outlying settlement in Borough. Although no specific sites have yet to be identified in the Preferred Options Local Plan in the outlying settlements, there needs to be a proportionate level of growth around Lymm.

Question 14: Do you agree with our approach to providing new employment land?

We support the approach to providing new employment land in the Borough to meet the need to provide an employment land target of 381 ha over the next 20 years. The Plan rightly seeks to maximize the capacity within the existing urban area with a supply of 130 ha in existing areas, however there is still a requirement to provide 251 ha on land currently within the Green Belt.

We support the broad locations for future employment development identified in table 9 of the Preferred Options Local Plan. This has had regard to existing employment sites and their extension including land adjacent to Omega, the expansion of Port Warrington, already identified within the Core Strategy, but also draws on the qualitative assessment of preferred employment locations in the Council's EDNA against the locational requirements for specific B2/B8 distribution uses. This confirms a specific locational requirement for these uses in close proximity to a strategic road network, on a scale which cannot be met at Omega and Woolston Grange.

Land at the M6 Junction 20 / M56 junction 9 performs strongly against criteria set out in the EDNA and recognizes the need to align job growth and employment with a new strategic employment site which is also a key component of the wider Garden City Suburb concept forming a sustainable mixed use community. We support the preferred location of employment land to be safeguarded in the plan, which ensures the M56 and M6 now provide long term durable and defensible Green Belt boundaries.

Question 15: Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?

We have no further comments to make.