SATNAM PLANNING SERVICES

17 Imperial Square, Cheltenham, Gloucestershire, GL50 1QZ, U.K.

T: +44 (0)1242227159 F: +44 (0)1242 227160 E: admin@satnam.co.uk

Our Ref: 258SBCGWARR

by email: ldf@warrington.gov.uk

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

27 September 2017

Dear Sirs,

Re: Preferred Option Local Plan, Consultation

Please find attached and enclosed copies of the representations submitted on behalf of Satnam Millennium Ltd and Brooklyn Holdings Ltd in respect of their land holdings in Warrington. Both sites are suitable and available for housing development within the plan period.

Peel Hall is a site in the SHLA and expected to produce houses within the early years of the plan period.

Ashton's Farm, Burtonwood is a green belt site, the development of which would not harm the purposes and objectives of the green belt. The site lies adjacent to Burtonwood a village which is able to accommodate significant amounts of housing in the plan period.

Yours sincerely



ENCLOSURES

Internal Use Only	
Date Received:	
Acknowledged by:	
Recorded by:	



Warrington Borough Council

Local Plan

Preferred Development Option

Regulation 18 Consultation

Standard Response Form

July 2017

2: Questions

Question 1

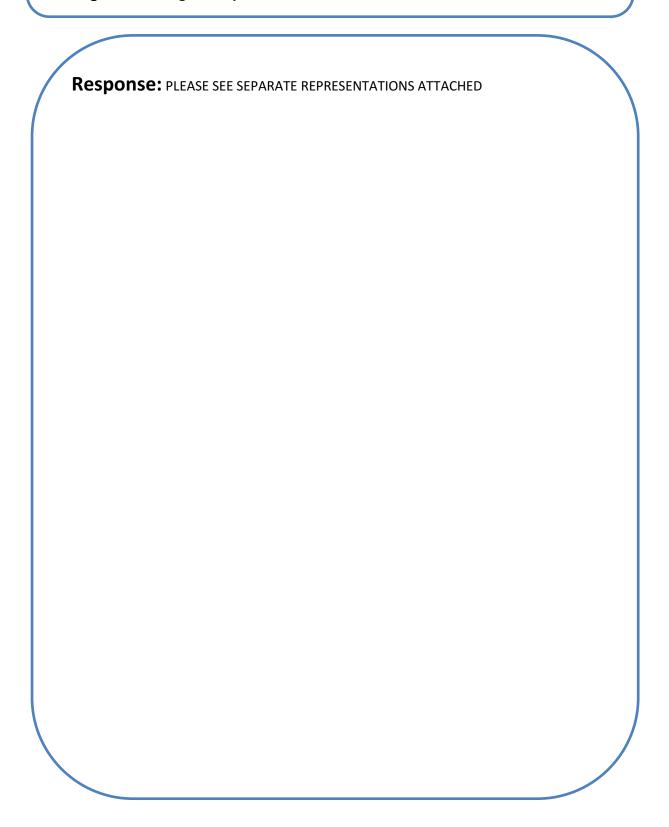
Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

Response:

WE OBJECT - PLEASE SEE SEPARATE REPRESENTATIONS ATTACHED

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?



Question 3	
Have we appropriately worked out the amount of land to be released from the Belt, including the amount of land to be 'safeguarded'?	Green
Response: please see separate representations attached	
	`

Question 4	
Do you agree with the new Local Plan Objectives?	
Response: Please see separate representations attached	

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

Questic	on 6				
	ve any comments development locat		t how we've a	ssessed differen	t options for
ine main	development locat	ions:			
/ Res	oonse: Please se	E SEPARATE REP	RESENTATIONS	ATTACHED	

future development needs?					
Respons	e: please see si	EPARATE REPR	ESENTATIONS A	TTACHED	

Question 8	
Do you have any comments to make about our Preferred Developments City Centre?	nt Option for the
Response: PLEASE SEE SEPARATE REPRESENTATIONS ATTACHED	

o you have any o		ake about ou	r Preferred D	evelopment C	option for th
Response	PLEASE SEE SEP	ARATE REPRES	ENTATIONS AT	TACHED	

Question	10			
	any comments to ma ne Warrington Water		eferred Developr	ment Option for
Respon	Se: PLEASE SEE SEPAR	ATE REPRESENTA	TIONS ATTACHED	

Question 11	
Do you have any comments to make about our Preferred Development Option Warrington Garden City Suburb?	for the
Response: PLEASE SEE SEPARATE REPRESENTATIONS ATTACHED	

Questi	on 12					
	ave any comme estern Urban Ex		about our P	referred Dev	velopment C	ption for the
Res	ponse: PLEASE	SEE SEPARAT	E REPRESENT	ATIONS ATTA	ACHED	

Question 13 Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements? **Response:** Please see separate representations attached

Question 14	
Do you agree with our approach to providing new employment land?	
Response: Please see separate representations attached	\
	/

Question 15 Do you agree with our suggested approach for dealing with Gypsy and Travellers and **Travelling Showpeople sites? Response:** Please see separate representations attached

Question 16	
Do you agree with our suggested approach for dealing with Minerals a	and Waste?
Response: Please see separate representations attached	

Questio	n 17					
Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?						
Response: Please see separate representations attached						

Internal Use Only	
Date Received:	
Acknowledged by:	
Recorded by:	



Warrington Borough Council

Local Plan

Preferred Development Option

Regulation 18 Consultation

Standard Response Form

July 2017

2: 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?

Response:

WE OBJECT - PLEASE SEE SEPARATE REPRESENTATIONS ATTACHED

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?

Response: Please see separate representations attached

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'? **Response:** Please see separate representations attached

Question 4	
Do you agree with the new Local Plan Objectives?	
Response: PLEASE SEE SEPARATE REPRESENTATIONS ATTACHED	

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

Response: Please see separate representations attached

Qu	estion 6
	you have any comments to make about how we've assessed different options for main development locations?
	Response: Please see separate representations attached

Do you agree with our Preferred Development Option for meeting Warrington's future development needs?					
Page					
kespons	e: PLEASE SEE S	EPARATE REPRES	SENTATIONS ATT	ACHED	

Do	restion 8 you have any comments to make about our Preferred Development Option for the
City	y Centre?
	Response: PLEASE SEE SEPARATE REPRESENTATIONS ATTACHED
\	

Question 9 Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?					
Respons	e: please see sei	PARATE REPRESE	NTATIONS ATTA	CHED	

Question 10
Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?
Response: Please see separate representations attached

Quest	ion 11						
		omments to n City Suburl		t our Prefer	red Developn	nent Option	for the
							_
Res	sponse:	PLEASE SEE SE	PARATE REPI	RESENTATION	IS ATTACHED		

Qu	uestion 12
	you have any comments to make about our Preferred Development Option for the other with Western Urban Extension?
	Response: Please see separate representations attached

Question 13 Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements? Response: PLEASE SEE SEPARATE REPRESENTATIONS ATTACHED

Question 14
Do you agree with our approach to providing new employment land?
Response: Please see separate representations attached

Question 15 Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites? Response: Please See Separate Representations Attached

Question 16				
Do you agree with our suggested approach for dealing with Minerals and Waste?				
Response: Please see separate representations attached				

Question 17 Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?				
Response	PLEASE SEE SEPARATE R	EPRESENTATIONS A	ATTACHED	

WARRINGTON BOROUGH COUNCIL

LOCAL PLAN - PREFERRED DEVELOPMENT OPTION FORM

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? (select one option only)

PLEASE SEE SEPARATE REPRESENTATIONS BY LICHFIELDS LLP ON BEHALF OF SATNAM

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? (select one option only)

The proposals for the development of sites within the built up area is not properly addressed in the Preferred Development Option, which largely focuses on Green Belt release. A plan should be included, or at the very least a schedule, setting out the sites within the built up area proposed for development in the plan period. This list of sites includes Peel Hall, owned by Satnam Millennium Ltd.

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

(select one option per row)

The plan appears to have stepped directly into specific site allocations without a full appraisal of the reasonable alternatives available. The lack of detail regarding village Green Belt sites is unfortunate and this omission will disadvantage owners and residents at this stage of the plan's preparation. A complete picture and range of alternatives should be set out. Only by doing this can the plan be assured of reaching the position of allocating the best sites for development, including aspects such as technical, local preferences, locational and environmental considerations.

4 **Do you agree with the new Local Plan Objectives?** (select one option only)

The objectives are generic and broad. The term "inner Warrington" needs to be defined, by reference to the plan area.

- Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development? (select one option only)
 - 1) The range of spatial options for Warrington's future development appears to be limited and not comprehensive.
 - 2) We are concerned that some options have not been included or assessed.
 - 3) As such we have concerns that a pre-defined outcome is proposed, which cannot be justified by S.A. of reasonable alternatives.
- Do you have any comments to make about how we've assessed different options for the main development locations? (select one option only)

The assessment of these areas is high level and broad, and does not tackle the detailed findings and issues that will establish availability, phasing and development profile / density. This is a major failing of the plan and must be addressed to make the plan sound prior to submission.

7 Do you agree with our Preferred Development Option for meeting Warrington's future development needs? (select one option only)

As set out above, we feel that the full range of available / reasonable alternatives has not been investigated therefore it is not able to be assessed if the presented options are the best.

8 Do you have any comments to make about our Preferred Development Option for the City Centre? (select one option per row)

Without the full range of SHLAA and other sites suitable for development being shown alongside the plan proposals, it is difficult to make full and reasoned assessments of new areas proposed for development.

9 Do you have any comments to make about our Preferred Development Option for the Wider Urban Area? (select one option only)

Without the full range of SHLAA and other sites suitable for development being shown alongside the plan proposals, it is difficult to make full and reasoned assessments of new areas proposed for development.

Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront? (select one option only)

Without the full range of SHLAA and other sites suitable for development being shown alongside the plan proposals, it is difficult to make full and reasoned assessments of new areas proposed for development.

Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb? (select one option only)

The proposal is speculative, uncertain and untested by full investigations. No proper analysis of the components of the proposal (highways, environmental, infrastructure etc) have been made or assessed.

Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension? (select one option only)

The proposal is speculative, uncertain and untested by full investigations. No proper analysis of the components of the proposal (highways, environmental, infrastructure etc) have been made or assessed.

Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements? (select one option only)

There is little information regarding outlying settlements and allocations are not set out for assessment and scrutiny. This is a failing of the plan. There is no clarification as to how the number of dwellings considered suitable for each settlement are arrived at or considered. In sustainable settlements, such as Burtonwood, there is considerable scope for development above the numbers proposed in the plan.

Do you agree with our approach to providing new employment land? (select one option only)

No comment in this regard at this time.

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites? (select one option only)

No comment to this aspect of the plan at this time.

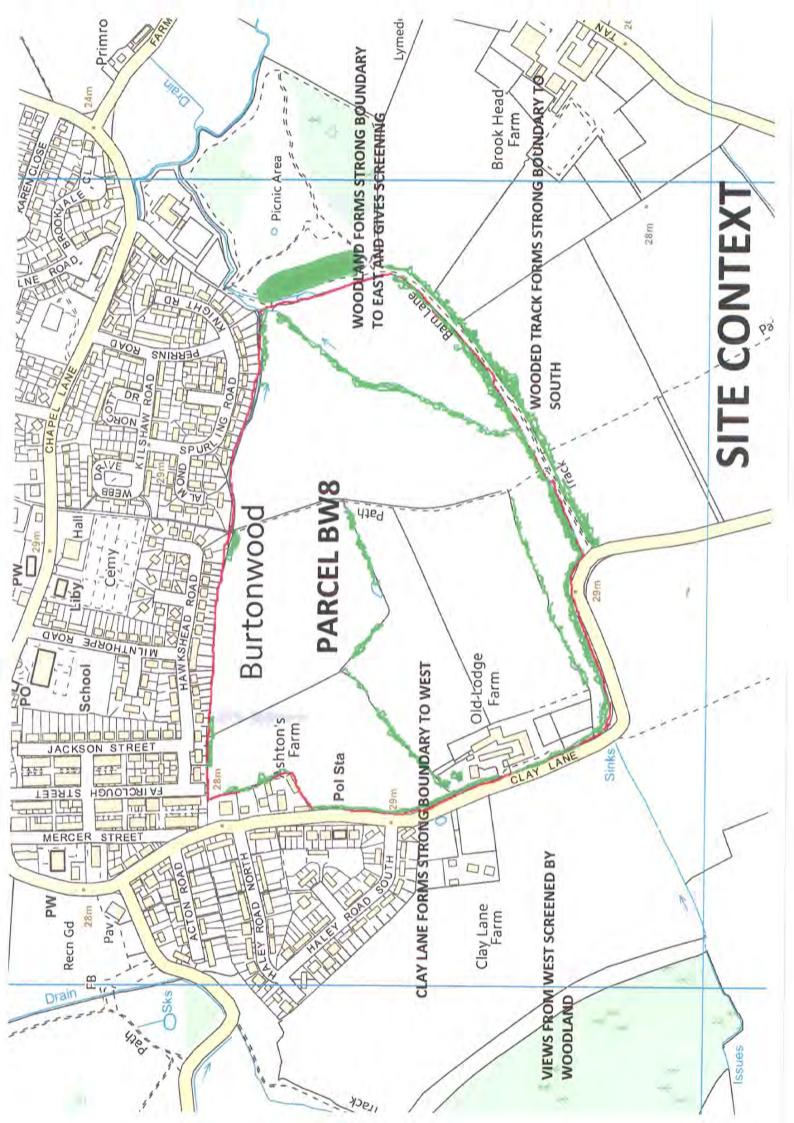
Do you agree with our suggested approach for dealing with Minerals and Waste? (select one option only)

No comment to this aspect of the plan at this time.

Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan? (select one option only)

In summary,

- 1) The Preferred Development Option should present a full range of options and reasonable alternatives. The plan instead presents the selected options.
- 2) The plan should set out the full range of sites considered suitable for development. At present only major Green Belt sites are set out in detail.
- 3) The underlying reasons for specifically allocating the selected Green Belt sites on the edge of the urban area and the number of dwellings for each of the Green Belt settlements, are not clear or set out.
- 4) the omission of outlying settlement development sites is regrettable and weakens the plan, a full picture of sites proposed for development in the plan period, throughout the plan area, should be presented.



WARRINGTON BOROUGH COUNCIL

LOCAL PLAN - PREFERRED DEVELOPMENT OPTION FORM

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? (select one option only)

PLEASE SEE SEPARATE REPRESENTATIONS BY LICHFIELDS LLP ON BEHALF OF SATNAM

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? (select one option only)

The proposals for the development of sites within the built up area is not properly addressed in the Preferred Development Option, which largely focuses on Green Belt release. A plan should be included, or at the very least a schedule, setting out the sites within the built up area proposed for development in the plan period. This list of sites includes Peel Hall, owned by Satnam Millennium Ltd.

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

(select one option per row)

The plan appears to have stepped directly into specific site allocations without a full appraisal of the reasonable alternatives available. The lack of detail regarding village Green Belt sites is unfortunate and this omission will disadvantage owners and residents at this stage of the plan's preparation. A complete picture and range of alternatives should be set out. Only by doing this can the plan be assured of reaching the position of allocating the best sites for development, including aspects such as technical, local preferences, locational and environmental considerations.

4 **Do you agree with the new Local Plan Objectives?** (select one option only)

The objectives are generic and broad. The term "inner Warrington" needs to be defined, by reference to the plan area.

- Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development? (select one option only)
 - 1) The range of spatial options for Warrington's future development appears to be limited and not comprehensive.
 - 2) We are concerned that some options have not been included or assessed.
 - 3) As such we have concerns that a pre-defined outcome is proposed, which cannot be justified by S.A. of reasonable alternatives.
- Do you have any comments to make about how we've assessed different options for the main development locations? (select one option only)

The assessment of these areas is high level and broad, and does not tackle the detailed findings and issues that will establish availability, phasing and development profile / density. This is a major failing of the plan and must be addressed to make the plan sound prior to submission.

7 Do you agree with our Preferred Development Option for meeting Warrington's future development needs? (select one option only)

As set out above, we feel that the full range of available / reasonable alternatives has not been investigated therefore it is not able to be assessed if the presented options are the best.

8 Do you have any comments to make about our Preferred Development Option for the City Centre? (select one option per row)

Without the full range of SHLAA and other sites suitable for development being shown alongside the plan proposals, it is difficult to make full and reasoned assessments of new areas proposed for development.

9 Do you have any comments to make about our Preferred Development Option for the Wider Urban Area? (select one option only)

Without the full range of SHLAA and other sites suitable for development being shown alongside the plan proposals, it is difficult to make full and reasoned assessments of new areas proposed for development.

Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront? (select one option only)

Without the full range of SHLAA and other sites suitable for development being shown alongside the plan proposals, it is difficult to make full and reasoned assessments of new areas proposed for development.

Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb? (select one option only)

The proposal is speculative, uncertain and untested by full investigations. No proper analysis of the components of the proposal (highways, environmental, infrastructure etc) have been made or assessed.

Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension? (select one option only)

The proposal is speculative, uncertain and untested by full investigations. No proper analysis of the components of the proposal (highways, environmental, infrastructure etc) have been made or assessed.

Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements? (select one option only)

There is little information regarding outlying settlements and allocations are not set out for assessment and scrutiny. This is a failing of the plan. There is no clarification as to how the number of dwellings considered suitable for each settlement are arrived at or considered. In sustainable settlements, such as Burtonwood, there is considerable scope for development above the numbers proposed in the plan.

Do you agree with our approach to providing new employment land? (select one option only)

No comment in this regard at this time.

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites? (select one option only)

No comment to this aspect of the plan at this time.

Do you agree with our suggested approach for dealing with Minerals and Waste? (select one option only)

No comment to this aspect of the plan at this time.

Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan? (select one option only)

In summary,

- 1) The Preferred Development Option should present a full range of options and reasonable alternatives. The plan instead presents the selected options.
- 2) The plan should set out the full range of sites considered suitable for development. At present only major Green Belt sites are set out in detail.
- 3) The underlying reasons for specifically allocating the selected Green Belt sites on the edge of the urban area and the number of dwellings for each of the Green Belt settlements, are not clear or set out.
- 4) the omission of outlying settlement development sites is regrettable and weakens the plan, a full picture of sites proposed for development in the plan period, throughout the plan area, should be presented.

