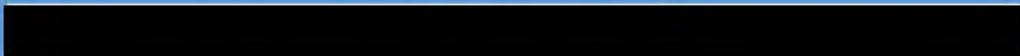




Warrington Borough Council Local Plan Preferred Development Option Regulation 18 Consultation

Representations on behalf of



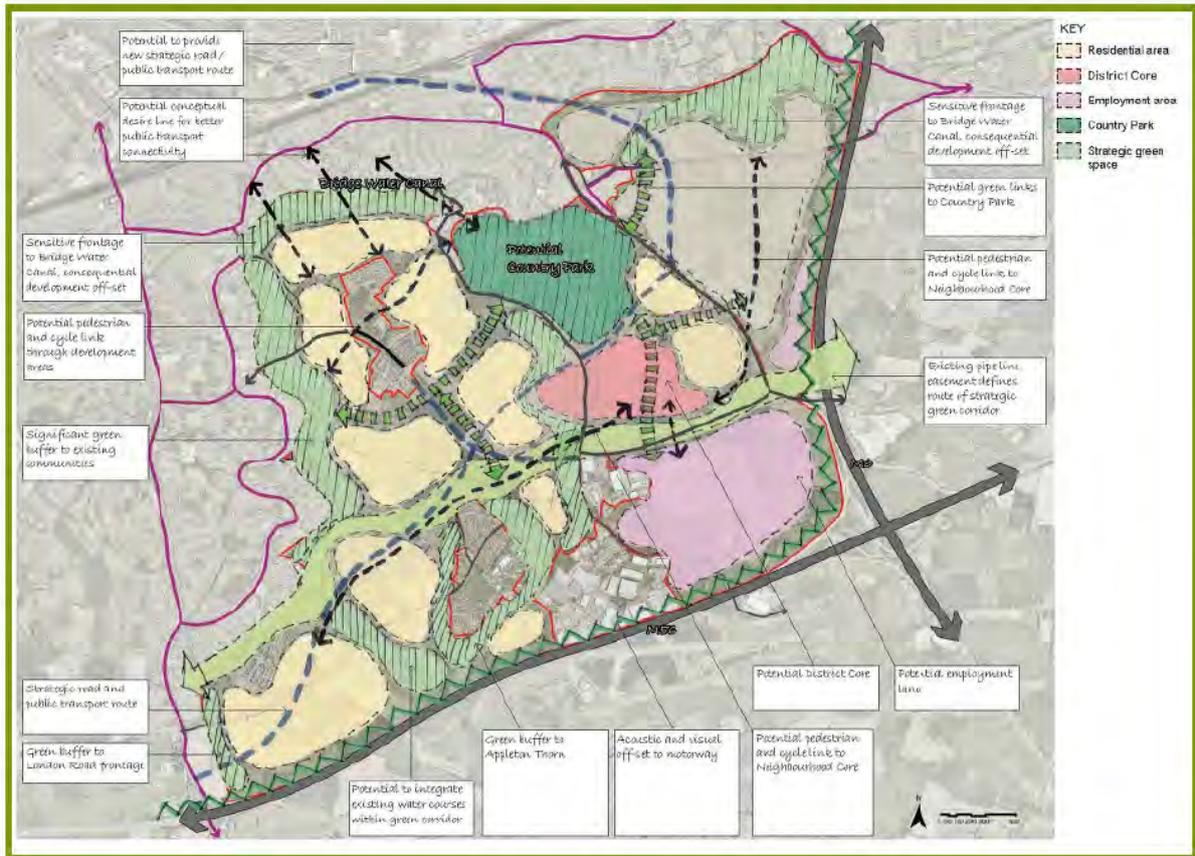


Figure 2: Proposed Warrington Garden City Suburb as identified by Figure 7 of the Preferred Development Option - Consultation (July 2017)

Representations have not been made to all of the policies contained in the emerging Local Plan, only those of most relevance to the site.

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Housing Need and Job Growth

Warrington has significant ambitions for economic growth, as reflected in the Warrington Means Business regeneration programme, updated in December 2016 and in the scale of development proposed as part of the Cheshire and Warrington Devolution bid. The Local Enterprise Partnership (LEP) and the Council are confident the level of growth proposed is achievable with the interventions set out in the Strategic Economic Plan (SEP) and the scale of public and private sector investment the LEP is seeking to secure. The Council should therefore plan for this level of growth.

Despite this, the Council has utilised a growth rate derived from the baseline economic forecast for Warrington which is the basis for defining Warrington's Objectively Assessed Need (OAN) for housing of 1,113 homes per annum. The updated Strategic Housing Market Area (SHMA) has also assessed the housing requirement which would arise if historic levels of job growth are maintained over the entire plan period. This is the higher growth rate and equates to a housing need of 1,332 homes per annum. This results in a significant difference in overall requirement for the Plan period. Utilising the 1,113 homes per annum rate this provides a Plan target of 22,260 dwellings, whilst using the latest SMHA figures, resulting in 1,332 homes per annum, this would result in 26,640 dwellings across the Plan period; a difference of 4,380. This difference is further increased when including the acknowledged shortfall of 847 dwellings and the 5% flexibility, resulting in a disparity of 4,599 homes.

It is considered that in order to reflect the Council's ambitions for growth as set out in the Warrington Means Business regeneration programme, Warrington's past track record of economic success and the scale of private sector interest wanting to invest in Warrington, the Council should use the higher figure of 1,332 dwellings per annum and a Plan target of 26,640 dwellings; 28,819 dwellings including the shortfall and 5% flexibility.

Green Belt

In order to meet the need of the Borough, the release of Green Belt to the south east of Warrington is fully supported. It is considered that Green Belt release in this location is essential in order to deliver the Council's housing requirement over the Plan period.

Warrington Garden City Suburb and Safeguarded Land

The identification of the south-eastern urban extension of Warrington for a new Garden City Suburb is supported.

It is considered that in order to deliver the Council's vision of a well-planned Garden City, which is focused around an attractive green network, a density of 20 dwellings per hectare (dph) is appropriate. It is agreed that this reflects best practice examples from successful urban extensions of a similar scale, and as such is supported.

The Council have considered the potential capacity of the Garden City if a standard Strategic Housing Land Availability Assessment (SHLAA) density assumption were applied, however we do not support this approach for this development scenario. The density put forward of 20 dph is considered to provide an overall balance between built and green space which is consistent with the most recent guidance on Garden City design.

The Council has identified an area within the Preferred Development option as Safeguarded Land, to be released from the Green Belt as part of the Plan, but for development delivery beyond the Plan period. The identification of the land for development is supported, however it is considered that as the land forms part of the overall Garden City Suburb vision that it should form part of the Garden City Suburb allocation. The masterplan prepared for the Garden City clearly identifies the safeguarded land as forming part of the Garden City, which includes potential for a new strategic road/public transport route through the safeguarded land, bypassing Grappenhall, and through the proposed Garden City allocation towards Junction 10 of the M56. This infrastructure forms a key element to the urban extension/Garden City and as such all land parcels should be considered together in order for this strategic element of the proposals to be delivered, thus enabling eventual delivery of the homes and employment uses the area of development is intended for. Given that the parcel of land identified to be safeguarded is so small in comparison to the wider allocation, and that such critical strategic infrastructure forms part of the land, it is considered that it too should be released and allocated now, to ensure that the Plan can deliver its housing requirement without the need for a review of the Plan to further release the safeguarded land.

The Council's commitment in Paragraph 5.33 of the Plan, is supported. It is considered essential that the Council works with landowners to prepare a more detailed masterplan for the area. As discussed above, it is considered that the land identified for safeguarding needs to be included in the allocation. As such the associated masterplan should extend beyond the proposed allocation which forms part of this Plan period, to include detailed masterplanning

of the land identified as safeguarded land too (even if it is not re-allocated in the Plan to deliver during this Plan period).

If the Council consider it appropriate to safeguard the land to the north east of the proposed Garden Suburb, rather than include it as part of the allocation for this Plan period, it is considered that the plan shown in Figure 7: Warrington Garden City Suburb, should make it clear that this parcel of land is to be safeguarded. At present, it is only Figure 9 of the Plan (Figure 2 above), which actually identifies the safeguarded land. The extent of land to be safeguarded needs to be made clear within the Garden City Suburb masterplan, and not just the Preferred development option. At present, it is illustrated as a greyed-out area which is not identified on the associated key.

The allocation of the safeguarded land is even more paramount when considering the Council should be using the higher updated SHMA figure of 1,332 dwellings per annum, as opposed to the 1,113 dwelling per annum set out in the Plan. The safeguarded land would assist in helping to deliver the additional 4,599 homes identified as required across the Plan period as a result of the economic growth forecast. The South Warrington Urban Extension Development Framework Plan Document June 2017, identifies the safeguarded area to have a developable area of 142 hectares, able to deliver 2,840 dwellings at 20 dph. As stated, the allocation of this land within the plan period will assist in meeting the identified housing need.

In addition, in the Plan the Council make reference to Fiddlers Ferry power station, stating that it may come forward for development during the Plan Period. Whilst the Government has pledged to end coal-fired electricity generation by 2025 there remains uncertainty over this. New contracts have already been provided to Fiddlers Ferry extending the operations onsite. The site has been providing electricity to supply approximately two million homes. Those electricity requirements will need to be met still, and at present there is no solution for doing so. As such there is currently a need to keep the station open and operational. In the event that the coal-fired operations cease, there is a very real possibility that the site will remain a power generating site, as has often been the case. The Council cannot rely on such land coming forward for housing. The 5% flexibility applied to the housing requirement, to allow for market choice and in the event that specific sites do not come forward, is considered to be at the lower end of flexibility rates, however the Council justified this by setting out that there is the potential that the Fiddlers Ferry Power Station site may come forward for development during the Plan Period. Given this is unlikely to occur it could be argued that the flexibility rate should be higher.

Aligned with the higher housing need identified, the low flexibility rate and the clear vision for the area as a whole, with strategic infrastructure illustrated through the safeguarded land, it is considered that the safeguarded Garden City Suburb parcel should be identified as an allocation. The Plan cannot be considered sound if it does not seek to deliver the housing requirement – the allocation of this land would seek to address this.

If the land continues to remain safeguarded however, it is critical that a policy is included in the Plan detailing how the land will be released in the event that the land is required ahead of the end date of the Plan period.