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# **Warrington Borough Council**

## **Local Plan**

### ***Preferred Development Option***

### **Regulation 18 Consultation**

### **Standard Response Form**

**July 2017**

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## 1: Contact Details (Compulsory)

Title:

First Name:

Last Name:

Organisation (if applicable): Milton Investments

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(please mark correspondence: )

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**Which best describes you?** (tick ✓ one option only)

Resident in Warrington

Resident from outside of Warrington

Business

Other, please specify

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27 September 2017

EPP ref: 17-316

██████████ ██████████  
T: ██████████  
██

By email only: [ldf@warrington.gov.uk](mailto:ldf@warrington.gov.uk)

Dear Sir or Madam

Re: Representations to the Regulation 18 Consultation, September 2017 - Land at Deans Lane, Thelwall

We are instructed by our client, Milton Investments, to make representations to the Regulation 18 consultation currently being conducted by Warrington Borough Council. The representations relate to their site known as Land at Deans Wharf, Thelwall. The site is a triangular green field, which is currently set within the Green Belt in its entirety. It is set to the west of Deans Wharf, and is bounded by the railway line to the north, dense woodland to the west and the Bridgewater Canal to the south. A site location plan is enclosed with this letter.

We make initial comments to the consultation administration in the first instance. The plans provided as part of the package of online documents are of a poor quality and extremely low resolution. This has led to some ambiguity in establishing the extent of proposed allocations as well as the proposed uses within them.

Furthermore, it was apparent that the plans provided online were of a lower standard than those provided at the drop-in sessions at various locations throughout the borough. Numerous requests were made for higher resolution plans, but none have been provided by the authority. This is contrary to guidance set out in NPPG paragraph 010 (Reference ID: 12-010-20140306) which states that:

*“Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions).*

*The policies map should illustrate geographically the policies in the Local Plan and be reproduced from, or based on, an Ordnance Survey map.”*

The discrepancy between the plans available online and those available at consultation events is contrary to the above. This submission is therefore made following a review of the best information available to us.

Notwithstanding the above, the representations are made on the following two grounds:

1. The proposed housing requirement as set out in the Preferred Options document is too low, and proposed delivery is particularly constrained in the first 5 years. Allocation and delivery of suitable, available and achievable sites such as Land at Deans Lane is essential to address this shortfall; and
2. The site is identified in the Preferred Options consultation document as being within a wider parcel of designated safeguarded land. It is recommended that this site is included within the strategic allocation for early delivery for the reasons set out above.

#### Contribution to the overall housing land supply

The site is promoted on the basis that it is suitable, available and achievable for residential development in the first 5 years of the plan, which is essential in the context of a constrained housing delivery target; particularly in the first five years of the plan.

In its current form, the proposed strategy for delivering housing in Warrington as set out in the preferred options consultation would not provide a 5 year housing land supply on adoption of the plan. Even on the Council's own figures, which include for unrealistic delivery rates from a number of sources, only 4,638 dwellings would be delivered in years 0-5 (927 per annum). This is significantly less than the minimum base requirement of 1,113 per annum, before the shortfall accumulated since 2015 is accounted for. It also follows a prolonged period of historic under delivery in Warrington.

To address the housing land supply issues that we have identified above, we consider that additional deliverable allocations are required. In particular, there is a need to diversify the supply through allocations of a smaller scale, which can come forward quickly to meet identified needs in the short term, unburdened by significant infrastructure requirements. The allocation of additional sites that are available and achievable for delivery in the short term is necessary to achieve the overall housing requirement, and also to provide a 5 year supply on adoption of the plan.

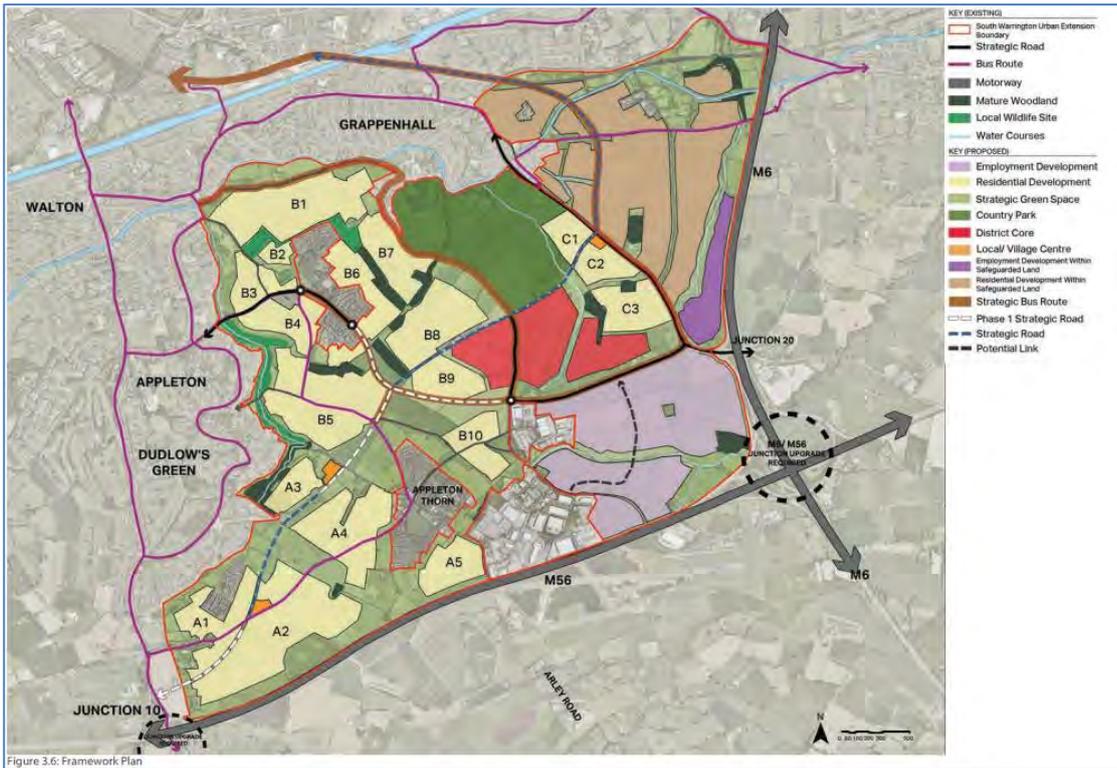
As stated above, the site is deliverable in the short term and would make a contribution towards addressing the identified shortfall. The site benefits from good access, and we are not aware of any issues relating to land contamination, trees, topography or ecology that could not be mitigated by any proposed residential scheme. Furthermore, it is in Flood Zone 1 on the Environment Agency flood risk map, which means that it has a low probability of flooding.

#### Current designation as safeguarded land

The site is identified in the Preferred Options consultation document as being within a wider parcel of designated safeguarded land. This land is anticipated to come forward for delivery at the end of the new plan period, beyond 2037. The site is currently designated as 'Strategic Green Space', and is adjacent to a residential allocation beyond Deans Wharf to the east.

We welcome the Council's acknowledgement that the parcel identified as safeguarded land in the 'Garden City Suburb - Development Concept plan' in the evidence base ('Parcel 9' in the Green Belt Assessment) is an acceptable location for residential development. However, we consider it should come forward much sooner, and within the plan period. We also object to the site's provisional allocation as 'Strategic Green Space'.

The proposed allocation is identified in the diagram as seen in the 'Garden City Suburb - Development Concept plan' is as follows:



As demonstrated above, the site is adjacent to the western boundary of the parcel of land allocated for residential development to the north of the Bridgewater Canal. The site would form a logical extension to this allocation, as it is not constrained by any ownership or technical issues that we are aware of. We therefore object to its allocation as 'Strategic Green Space' and propose its allocation for residential development.



As demonstrated above, the parcel of land proposed for safeguarding (which includes our client's site) has a stronger relationship with the existing urban area than some of the parcels identified for development during the plan period, particularly proposed phases 2 and 3. The allocation of the 'Garden City Suburb' would significantly weaken the parcel's contribution to the Green Belt, as it would be enclosed on 3 sides by development and on the 4<sup>th</sup> by the M6 to the east.

Its allocation for development during the plan period would also contribute towards the overall delivery of the Garden City Suburb, particularly in the early phases, as it benefits from good access to and a strong relationship with Grappenhall to the west and Thelwall to the north, with all their associated amenities. Clearly however this is dependent upon the site being able to come forward unburdened by wider masterplanning requirements associated with the wider site.

Our client's site has no ownership or technical constraints that we are aware of, and could come forward for residential development to boost the housing supply in the short term. Allocating the wider parcel at this stage would also provide more housing throughout the plan period, which is considered necessary as set out in the assessment of past economic trends in the strategic representations made to this consultation.

To conclude, the site is suitable, available and achievable for residential development, and should be released from the Green Belt, particularly in the context of the authority's aspirations for delivering the 'Warrington Garden City Suburb' in order to address the significant housing need in the borough.

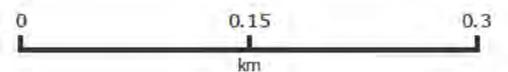
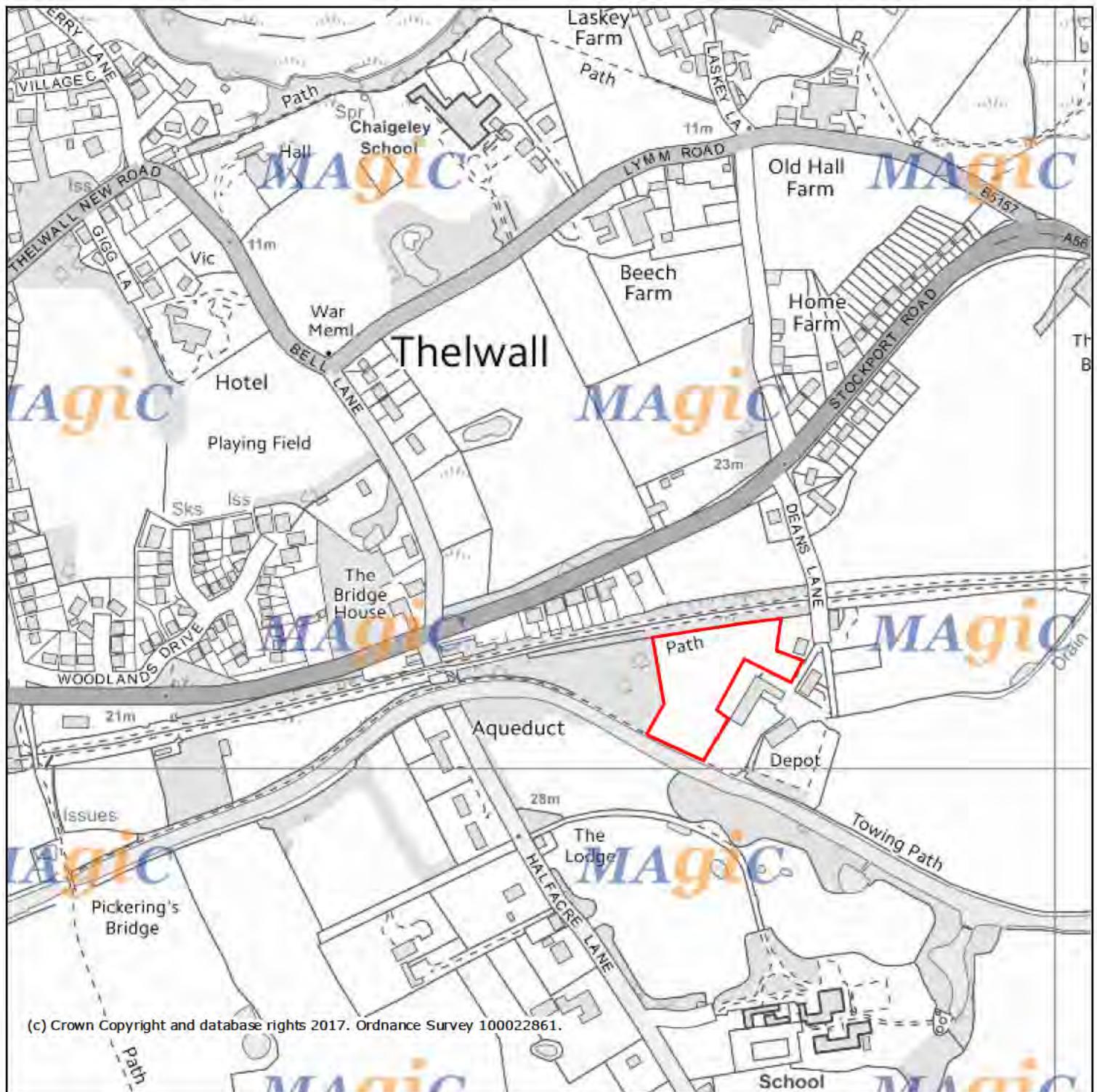
This concludes our representations. Should you have any further queries, please do not hesitate to contact me or my colleague, [REDACTED]

Yours sincerely  
Emery Planning

[REDACTED]  
**Consultant**

Enc: Site location plan

# MAGiC 1 at Deans Wharf - Location Plan



Projection = OSGB36

xmin = 364300

ymin = 386600

xmax = 366800

ymin = 387800

Map produced by MAGiC on 29 September, 2017.  
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