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# **Warrington Borough Council**

## **Local Plan**

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

### **Regulation 18 Consultation**

### **Standard Response Form**

**July 2017**

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## 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:

No Comment.

## **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:**

It is considered that a robust assessment has not been carried out of the availability of smaller sites within the existing built up area of Warrington that offer an opportunity to accommodate new homes over the plan period. In particular, insufficient consideration has been given to greenfield sites in sustainable locations within the built-up area, including small scale back land sites. Furthermore, too many parcels of land with no public access or public value have been given open space designations which would prevent their future redevelopment without a clear and robust justification. It is our view that a much larger number of new homes could be accommodated within Warrington's built up area thus reducing the scale of Green Belt release.

### **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:**

No. Too much land is currently proposed to be released from the Green Belt when there are alternative suitable and appropriate sites within the built-up area of Warrington that could accommodate housing need over the plan period. Government guidance contained in the NPPF and the Housing White is clear that land should only be released from the Green Belt in exceptional circumstances. It is considered that exceptional circumstances cannot be demonstrated where there is land available for housing outside of the Green Belt.

## Question 4

Do you agree with the new Local Plan Objectives?

### Response:

No. We do not agree with the release of large areas of land from the Green Belt when there are alternative none Green Belt sites within the existing built up area of Warrington that could be developed for housing over the plan period. The location and scale of land proposed for release from the Green Belt can also not be described as 'sensitive'.

## **Question 5**

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

### **Response:**

Insufficient justification has been given for adopting Option 2.

## Question 6

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

### Response:

No comment

## **Question 7**

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

### **Response:**

No. Too much reliance is being placed on releasing land from the Green Belt in order to accommodate development needs with insufficient consideration given to other options.

### **Question 8**

**Do you have any comments to make about our Preferred Development Option for the City Centre?**

### **Response:**

No.

## Question 9

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

### Response:

No. Greater emphasis should be placed on the opportunities for delivering new homes within the wider urban area and particularly, the suburbs of Warrington which are sustainable locations for new residential development. Open areas of land should not be given unnecessary open space designations and development on them precluded without a robust assessment of their potential to meet the need for housing verses their value as open space. This relates particularly to areas of land categorised as 'green corridor', 'incidental private space', 'incidental public space', and 'natural/ semi natural green space'. Large numbers of sites/ parcels of land within the urban area of Warrington appear to being categorised as open space yet many of them may have good residential development potential. The potential of these sites for accommodating housing growth should be robustly assessed prior to the release of land from the Green Belt, which should only occur in exceptional circumstances.

## Question 10

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

### Response:

No comments

## **Question 11**

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

### **Response:**

No comment

## Question 12

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

### Response:

No comments

### **Question 13**

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

#### **Response:**

No comments.

## Question 14

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

### Response:

No comments

## Question 15

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?

### Response:

No comments

## **Question 16**

**Do you agree with our suggested approach for dealing with Minerals and Waste?**

### **Response:**

No comments

## Question 17

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

### Response:

No comment

**Our Ref: HB/KN1826/17**

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

28<sup>th</sup> September 2017

Dear Sir / Madam

**WARRINGTON BOROUGH COUNCIL LOCAL PLAN  
PREFERRED DEVELOPMENT OPTIONS / CALL FOR SITES CONSULTATION  
LAND TO THE REAR OF THE PLOUGH, MILL LANE, HOUGHTON GREEN**

The following representations are made on behalf of [REDACTED] in relation to the Warrington Local Plan Preferred Development Options consultation and the 'call for sites' consultation.

**The Site**

The site comprises an irregular shaped parcel of land located to the rear / northeast of the Plough Public House on Mill Lane, Houghton Green. The site lies within the main urban area of Warrington and specifically, the 'North Area'. It is generally flat and extends to an area of circa 0.8 hectares. The majority of the site is currently unused but was last used for grazing horses, apart from a small area of land in the southwest of the site, which is available for overspill car parking to serve the pub.

The site contains no buildings or permanent structures. There is an established means of vehicular access from Delph Road to the east via a field gate. Access can also be taken from the pub car park.

In terms of surrounding land uses, the site is bounded to the south by The Plough Public House and residential development, to the east by Delph Road, to the west by grazing land and to the north by the M62 motorway and more grazing land. The wider area around the site is residential in nature.

The location and extent of the site is shown on the attached plan contained with this letter.

**Ownership**

The site is entirely in the ownership of [REDACTED]

**Proposed Use**

The site is put forward as being a suitable and appropriate site for housing and allocation for residential development in the new Warrington Local Plan. The planning case for the development of the site for housing is set out below.

Based on a density of 30 dwellings per hectare the site is considered capable of delivering circa 28 dwellings.



There are a number of potential options for accessing the site. These include Delph Road to the east in approximately the location of the field gate; Mill Lane via the pub car park through reconfiguration of the existing car park; or via land in the control of the Homes and Communities Agency to the west.

The site could be combined with adjacent land to the west of the site and rear of 2 – 24 Mill Lane to make a larger development site. It is understood this may be owned by the Homes and Communities Agency.

### **Site Information**

The following information is considered useful and relevant to the Council's consideration and assessment of the site's suitability for residential development:

- Within the built up / main urban area of Warrington and suburb of Houghton Green;
- Greenfield;
- Not in a Conservation Area or within close proximity of statutorily listed buildings, although The Plough is a locally listed building;
- No individual or group TPO's;
- There are no public rights of way crossing the site;
- Located outside of the 50-metre motorway buffer;
- Flood Risk Zone 1;
- Not likely to be constrained by contamination.
- Outside the Green Belt.
- Not in an area of Archaeological Importance;
- Categorised as Grade 2 Agricultural Land, although this is considered to now be incorrect;
- Identified as natural/ semi-natural green space in the Open Space Audit 2015;
- Part of the site lies within the outer consultation zone for a gas pipeline to the north of the site. However, HSE PADHI guidance indicate that residential development in the outer zone is acceptable;
- Natural England Magic map indicates the site is not subject to any ecological / biodiversity constraints; and
- Not in an Air Quality Management Area.

### **Sustainability**

The site is in a sustainable location accessible to local schools and community facilities, local retail facilities and public open space. The site is within walking distance of bus stops on Enfield Park Road and is only a short distance from Padgate railway station.

### **Planning History**

The site has no planning applications or permissions of note.

### **Availability**

The site would be available for development immediately and is not subject to constraints which would delay the delivery of housing on the site.

### **Assessment of the site for housing**

The site is located within the main built up / urban area of Warrington and is located directly adjacent to existing residential development in the suburb of Houghton Green. The site is in Flood Risk Zone 1 and thus is not at risk of flooding. Neither is the site subject to any ecology / biodiversity, heritage or other constraints. Although the site is located in close proximity of the M62 motorway, it is located outside of the 50-metre motorway buffer and whilst it is within the HSE's 'outer consultation zone' to "The Plough Croft" gas pipeline, the HSE are



unlikely to advise against a development of less than 30 dwellings on the site having regard to the PADHI guidelines.

Having regard to these facts, and taking into account government guidance contained in the NPPF and Housing White Paper, it is our view that the site is suitable and appropriate for new residential development during the plan period. We request therefore that the site is acknowledged within the Council's New Strategic Housing Land Availability Assessment as a suitable, available and viability residential site and capable of delivering approximately 28 new dwellings over the plan period.

We also request that the site is allocated for housing in the new emerging Warrington Local Plan. In our view there is a strong case for the allocation of the site for housing, not least because of the difficulties the Council is facing in identifying sufficient land to meet housing need over the Plan period and the resultant need to release large areas of land from the Green Belt. Planning policy at all levels is clear that this should only be done in exceptional circumstances. Exceptional circumstances cannot exist in our view whilst there is land outside of the Green Belt which is suitable and appropriate for residential development and could be developed over the Plan period.

The Council have identified the site as natural/ semi natural open space in the Open Space Audit 2015 and whilst there is no suggestion at this stage that the site may be designated open space in the emerging plan, and thus protected from development, we consider it important to make the point at this stage that such a designation of the site is not appropriate, helpful or justifiable. The site is in our view of little, if any value, as open space. Not only is it surrounded by existing built development, including housing, the M62 motorway and Delph Road, but there is no public access, it makes little contribution to the visual amenity of the area and is only visible from limited public vantage points. The need for land in sustainable locations within the urban area of Warrington for housing in order to minimise the loss of land from the Green Belt should also override and take precedent over any aspiration to designate any site as open space and thus unnecessarily protect it from development. Furthermore, the definition of open space set out in the adopted Core Strategy is "all open space of public value". The subject site is not in our view of public value and thus it is inappropriate to define or designate it as open space.

Finally, it is relevant to the Council's consideration of this site, that policies contained in the adopted Warrington Core Strategy provide support for the development of this site for housing. Policy CS2 supports housing development in the urban area of Warrington and whilst priority is given to the redevelopment of previously developed land, the development of greenfield sites is not precluded. Support is also provided by Policy SN1, which states that proposals for residential development will be supported where they present an opportunity to widen the type, size and affordability of available housing in sustainable locations which are well served by existing infrastructure.

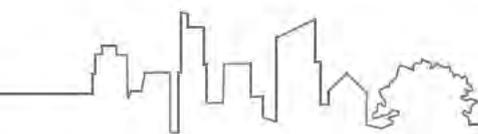
Having regard to the above, we respectfully request that the site is acknowledged as a suitable, available and viable residential site capable of delivering circa 28 dwellings in the next SHLAA and that it is allocated for residential development in the emerging Warrington Local Plan.

I trust that the information contained in this letter, together with the attached 'Preferred Development Options' consultation response form, is useful. Should you have any queries or wish to discuss matter further, please do not hesitate to contact me.

Yours faithfully

[Redacted signature]

[Redacted name]  
**Principal Consultant**  
[Redacted contact information]



Enc Preferred Development Options Consultation form  
Plan of the site

Cc [REDACTED]  
[REDACTED]

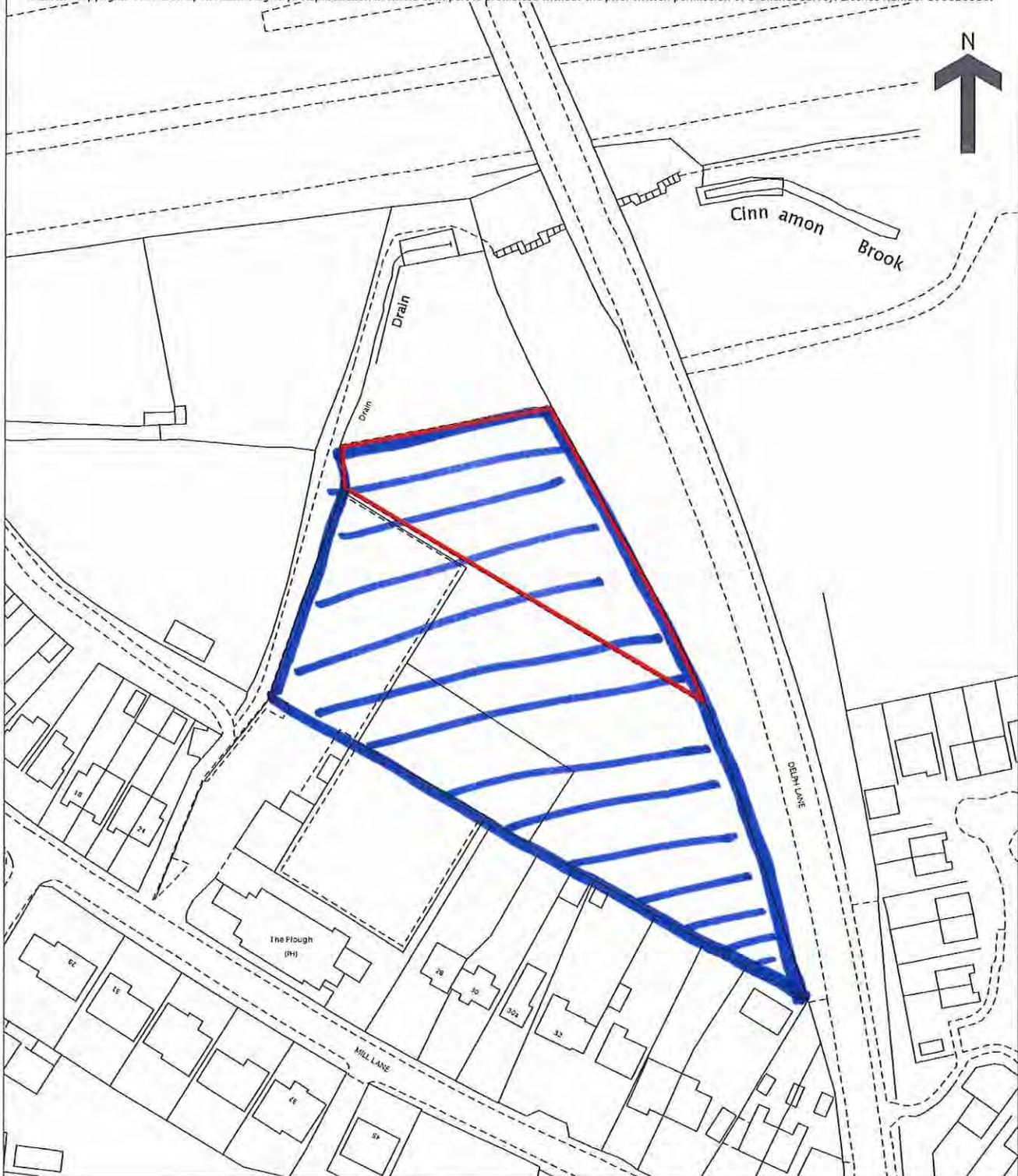


# HM Land Registry Current title plan

Title number **CH524629**  
Ordnance Survey map reference **SJ6291NW**  
Scale **1:1250**  
Administrative area **Warrington**



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**This title is dealt with by HM Land Registry, Birkenhead Office.**