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

Iceni ref. MG/WLP/17287

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)  
REGULATIONS 2012 (AS AMENDED) (REGULATION 19)**

**WARRINGTON LOCAL PLAN 2017-2037**

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We write on behalf of our client, Wallace Land Investments (Wallace), in respect of the Draft Submission Version of the Warrington Local Plan 2017-2037.

Accordingly, please find enclosed the following documents which comprise the total representations on behalf of Wallace:

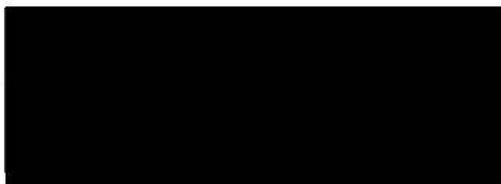
- Overall Response to the Whole Plan;
- Land at Junction 10 M56, Stretton;
- Land South of Hatton Lane, Stretton;
- Cherry Lane, Lymm; and
- Land off Smithy Brow, Croft

Due to the large size of the associated files we were unable to use the online representation forms. We would however, politely request that Wallace Land Investments are invited to participate in the Examination in Public on all issues.

We trust that the information provided is sufficient to enable the council to fully recognise the concerns that Wallace Land Investments have with the Plan as it stands.

In the meantime, please contact Murray Graham, [REDACTED] of this office in the first instance should you have any questions.

Yours sincerely,



Murray Graham  
DIRECTOR



## Representations to Proposed Submission Version

Warrington Local Plan Review  
Proposed Submission Version: Regulation 19 Consultation  
Iceni Projects on behalf of Wallace Land Investments

**June 2019**



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## 1. Executive Summary

1.01 These representations are made to the Draft Local Plan Publication Version on behalf of Wallace Land Investments (Wallace). These relate to the following matters:

1. Council's assessment of its housing land requirements and the need for greater flexibility given its chosen development strategy and reliance on completions from brownfield sites in the early years of the plan period. It is proposed that the flexibility allowance is increased from 10% to 20% adding a further 1,890 homes to the housing land requirement over the plan period;
2. Increasing the scale of Green Belt releases by 1,890 homes requires further allocations. The distribution of this additional land supply should be focussed on delivering a range of smaller sites which can deliver completions early in the first phase of the Local Plan. Wallace considers that this could be delivered in South Warrington Garden Suburb and the outlying villages. Wallace does not expect South West Urban Expansion and the Waterfront to be able to increase its rate of completions in the early period of the Local Plan and completions are expected to be lower;
3. Commentary on the Council's policy framework in the Local Plan and recommendations for modifications to help deliver the Council's development strategy, including its proposed housing trajectory and maintain a five year effective housing land supply at all times from date of adoption of the Local Plan;

In addition, Wallace continues to support and promote four sites which are designated in the Green Belt in the adopted Local Plan. These sites and status in the Draft Local Plan are as follows:

- Land at Junction 10, M56, Stretton – part of the South Warrington Garden Suburb;
- Land South of Hatton Lane, Stretton – adjacent to the South Warrington Garden Suburb but still in the Green Belt;
- Land at Smithy Brow, Croft – site is still in the Green Belt and located in the Council's outlying villages. Evidence by Wallace confirms this site is more sustainable than the Council's proposed allocation and has less impact on the Green Belt; and
- Land at Cherry Lane, Lymm - site is still in the Green Belt and located in the Council's outlying villages. Evidence by Wallace confirms this site is more sustainable than the Council's proposed allocations and has less impact on the Green Belt;

Individual representations for each of these sites have been made separately.

1.02 Wallace supports Warrington Borough Council's (Council) aspirations for growth and the comprehensive approach to its development strategy in order to meet Warrington's housing requirements. This provides the basis for the 'exceptional circumstances' that the National Planning Policy Framework (NPPF) requires to be demonstrated in order to support the release of greenfield land in the Green Belt as part of the Council's development strategy.

1.03 Wallace fully supports the Council's development strategy based on maximising the development of brownfield and infill sites in its urban area. The Council has identified 13,726 homes from its urban capacity assessment with a Green Belt requirement of 7,064 homes, based on a flexibility allowance of 10%. The development strategy for the Green Belt land releases is as follows:

- South Warrington Garden Suburb - a minimum of 6,490 homes of which 4,201 homes to be delivered within the plan period;
- South West Urban Extension (a minimum of 1,631 homes); and
- the outlying villages(a minimum of 1,085 homes in 6 villages).

1.04 In particular, Wallace supports the designation of the Garden Suburb to the south of Warrington as well as proposing greenfield development in the outlying settlements of Lymm and Croft. However, Wallace considers that the Council's housing trajectory is too optimistic about the scale of completions from the sites in the Urban Capacity. Consequently, the Council will fail to maintain a 5 year effective housing land supply from date of adoption of the Local Plan.

1.05 Wallace requests that the following matters are addressed as part of the Local Plan Review process. These modifications are summarised as follows:

- Land at Junction 10, M56, Stretton is one of the key sites providing infrastructure to deliver South Warrington Garden Suburb from the west. Since the route of the strategic road link for the Garden Suburb passes through this site and is a priority, the whole site should therefore be identified as delivering homes within years 0-5 of the plan period;

- In the context that the Draft Local Plan is dependent on completions from sites in the Urban Capacity which can be challenging in terms of lead-in, the Draft Local Plan requires additional flexibility to adapt to possible changing circumstances over the plan period. Accordingly, a 20% flexibility allowance (not 10%) should be included as part of the housing land requirement to ensure the Draft Local Plan delivers at least the minimum housing requirement within the plan period. This adds the requirement for an additional 1,890 homes. This should added to areas already included as part the Council's development strategy with a focus on effective housing sites which can deliver completions in the early years of the Local Plan;

- As well as a need for additional Green Belt land to be allocated and released to meet this additional housing land requirements, the Draft Local Plan should consider land for safeguarding purposes, if development in its strategic expansion areas is delayed. This ensures the Draft Local Plan maintains its flexibility. In this regard, Land South of Hatton Lane, Stretton should be safeguarded;

- The outlying settlements can accommodate further growth than that proposed in the Draft Local Plan. Further development should demonstrate that the choice of site is as sustainable as those proposed by the Council and that the impact on the Green Belt is no worse than that of the proposed allocations. All sites need to be effective and capable of delivering completions in the initial years of the Local Plan. In this regard, Wallace's sites at Land at Cherry Lane, Lymm and Land off Smithy Brow, Croft meet all of these requirements and should be allocated for residential development. These two sites will deliver much needed market and affordable homes in the early years of the plan period.

## 2. Introduction

- 2.01 These representations are submitted in response to the Council's Proposed Submission Version (Regulation 19) (March 2019) of the Warrington Borough Local Plan Review. They have been prepared by Icen Projects, Geddes Consulting & Sweco on behalf of Wallace Land Investments (Wallace), a strategic land promotion company. These representations respond to the emerging policies and strategic matters, having regard to the national, regional and local planning policy context. Wallace has identified a number of matters where modifications to the Draft Local Plan should be considered to assist its delivery. The representations also provide commentary in respect of the evidence base that underpins the Draft Local Plan and its spatial development strategy.
- 2.02 Wallace is a dedicated strategic land promoter who promotes residential and mixed-use sites in partnership with landowners across England and Scotland, and understand issues which need to be resolved to ensure their subsequent delivery as effective sites.
- 2.03 Since the beginning of the Local Plan Review process in October 2016, Wallace has worked closely with the Council and its partners to deliver the growth aspirations of the Council in terms of the South Warrington Garden Suburb.

### WALLACE'S CONTINUED ENGAGEMENT

- 2.04 Following the High Court ruling (February 2015) which quashed the housing target in the adopted Local Plan Core Strategy (2014), the Council reviewed its housing policies. It became clear that the Council required a full review of the adopted Local Plan. In October 2016, the Council's Executive Board agreed to commence the process of reviewing the existing Warrington Local Plan. The Council subsequently undertook a 6-week period of consultation on the scope of the review and the Council's assessment of Warrington's housing land requirement. Following this, the Council undertook the work necessary to progress to a Preferred Development Option (PDO) for accommodating Warrington's housing land requirement. Consultation on the PDO was carried out between 18th July and 29th September 2017.
- 2.05 Wallace responded to the scoping consultation and the later PDO consultation. Wallace included proposals for land to be promoted for sustainable residential development on four sites:
1. Land at Junction 10, M56, Stretton;
  2. Land south of Hatton Lane, Stretton;
  3. Land at Cherry Lane, Lymm; and
  4. Land off Smithy Brow, Croft.
- 2.06 Not all issues raised by Wallace were addressed by the Council at this stage in the Draft Local Plan. These are highlighted and are raised again where they will help to deliver the Plan successfully over the Plan period.
- 2.07 Since the PDO, Wallace has continued to engage with the Council to help ensure the delivery of the South Warrington Garden Suburb as set out in The Draft Local Plan Policy MD2; as well as continuing to make the case for further modest expansion of the settlements of Croft and Lymm.
- 2.08 Wallace has assessed the Proposed Submission Version of the Local Plan and has responded to each strategic objective and their relevant associated policies.

### POLICY CONTEXT

- 2.09 Wallace's response to this consultation is framed in the context of the requirements of the Warrington Borough Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Local Plan to be sound it must be:
- **Positively Prepared** - the plan should be prepared based on the 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 plan 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

### NATIONAL PLANNING POLICY FRAMEWORK

- 2.10 The National Planning Policy Framework (NPPF) was revised in 2018 - the first time since its publication in 2012. NPPF provides the policy context to ensure that the Council plans for the right homes in the right places, at the same time as protecting the environment.
- 2.11 It is vital that the Warrington Local Plan accords with the NPPF, particularly the following policies:
- Achieving sustainable development;
  - Delivering a sufficient supply of homes;
  - Building a strong competitive economy;
  - Promoting healthy and safe communities;
  - Promoting sustainable transport;
  - Making effective use of land;
  - Achieving well-designed places;
  - Meeting the challenge of climate change, flooding and coastal change;
  - Conserving and enhancing the natural environment; and
  - Conserving and enhancing the historic environment.

### NATIONAL HOUSEHOLD PROJECTIONS

- 2.12 National Household Projections released in September 2018 are based on 2016 data and project a reduction in housing need and demand for many local authorities, despite the nationwide housing growth agenda from central government.
- 2.13 To resolve this dichotomy, the Ministry for Housing, Communities and Local Government (MHCLG) advised that 2014-based National Household Projections should still provide the demographic baseline for assessment of local housing need but subject to scrutiny of this approach before updating its guidance. Guidance was then published in February 2019 and this confirmed the government's preferred approach.
- 2.14 This guidance is reflected in minor amendments to footnote 37 of the NPPF on page 20 and to the definition of 'Local housing need'.

***37. housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance***

- 2.15 This has clarified that the use of the standard method for calculating housing need is to be used for all calculations but there is an option when preparing strategic policies to use a justified alternative (NPPF para.60). This is a 'may' not a 'must' and is only intended for exceptional circumstances.
- 2.16 The Council in finalising its assessment of housing land requirements for the Draft Local Plan has adopted a target of around 4% higher than the minimum requirement set by the Government's Standard Housing Methodology (using the 2014 based household projections). Government guidance is clear that if the Council can demonstrate that an alternative approach identifies a higher housing need, the approach should be considered sound as it will have exceeded the minimum starting point (PPG Housing Need Assessment para 15).
- 2.17 Wallace supports the Council's approach in using the 2014 based projections as its starting point for calculating housing need.

### WARRINGTON CORE STRATEGY

- 2.18 The Warrington Core Strategy is the central policy document in Warrington's Local Planning Framework. It was adopted by the Council on 21 July 2014 and incorporates the Local Plan Core Strategy which sets out the overarching spatial strategy for the Borough, including the strategic vision for Warrington as to how it will look and function in 2027.

### DEVOLUTION DEALS AND THE NORTHERN POWERHOUSE AGENDA

- 2.19 In 2015, Warrington and Cheshire submitted a Devolution Bid for the "Gateway to the Northern Powerhouse". This promotes Warrington Borough Council forming a sub-regional partnership (combined authority) with Cheshire West & Chester and Cheshire East Councils. Whilst the priority for this Government is to push for the devolution of the key city areas such as Sheffield, the Government has indicated that the Cheshire and Warrington sub-regional partnership is the front runner for non metropolitan areas.
- 2.20 Wallace agrees with the approach of managed growth beyond the existing urban area, reflecting the projected population

## 2. Introduction

growth and household change. Wallace also agrees that Warrington area has a limited supply of brownfield land for future development and that that the Council needs to identify suitable areas for further development on greenfield land to support future housing growth.

- 2.21 The SHLAA (2018) has shown that housing land supply is increasingly constrained over the medium to long term and accordingly, a development strategy for land for new homes requires to deliver effective sites capable of adding to the housing land supply in the short term.
- 2.22 Transport for the North (TfN) Strategic Transport Plan – vision for Northern Powerhouse Rail (NPR) page 46) highlights a ... ‘New line between Liverpool and the HS2 Manchester Spur via Warrington’ and Warrington Local Transport Plan (WLTP) (draft approved Feb 19) reiterates and elaborates on TfN’s vision and starts to talk about a new nationally significant (NPR / West Coast Mainline / HS2) station gateway at Bank Quay. Both reinforce Warrington’s role as a catalyst for economic growth.
- 2.23 The Northern Powerhouse Partnership (NPP) has stated the north still has “notable regional gaps” in devolution and has earmarked Cheshire and Warrington as the “missing link” between Manchester and Liverpool. The NPP suggests that the Warrington and Cheshire sub-region comprises of a significantly important economic corridor in health innovation and transport.
- 2.24 This proposal is backed by the Cheshire and Warrington Local Enterprise Partnership (CWLEP).
- 2.25 The refreshed Strategic Economic Plan (SEP), published in July 2017, confirms the revised growth ambition shared across the Cheshire and Warrington sub-region: to grow its economy’s GVA to £50 billion per annum by 2040. The SEP sets out the key opportunities that will drive our growth ambitions:
- The world class science, technology and innovation assets within the Cheshire Science Corridor
  - The once-in-a-generation opportunity that HS2 will bring to the Constellation Partnership area and wider region
  - The unique cross-border opportunities within the Mersey Dee Economic Axis, and the potential to create Warrington New City
- 2.26 The SEP is intended to be a high-level, strategic road map to achieving growth ambition. The strategy has been designed to be flexible and provide a broad framework within which different areas and groups can align their activities. The SEP identifies Warrington New City as a ‘Spatial Priority’ and a Garden City at the heart of the Northern Powerhouse.

### 3. Vision and Spatial Strategy

#### VISION

3.01 Wallace agrees with the Council that it is important that the Draft Local Plan sets out a positive vision to guide Warrington’s future development. It is particularly important that Warrington’s growth is positively planned to ensure that new homes, jobs and businesses are supported by major improvements to the Borough’s infrastructure, benefitting existing and new communities alike. It is agreed that new housing development should support Warrington’s economic growth and focus on creating attractive, well designed, sustainable and healthy communities, within new urban extensions and outlying villages, as well as within the existing urban area.

#### PLAN OBJECTIVES

3.02 In principle, Wallace agrees with the strategic objectives of the Plan, and makes the following comments:

**W1. To enable the sustainable growth of Warrington through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods whilst:**

- **delivering a minimum of 18,900 new homes (equating to 945 per year) between 2017 and 2037; and**
- **supporting Warrington’s ongoing economic success by providing 362 Hectares of employment land between 2017 and 2037.**

3.03 This scale of future housing land is based on an annual housing target of 945 homes per annum over the plan period. Wallace supports that the figure of 18,900 should be clearly shown as a **minimum** in order to ensure the future delivery of all of these 18,900 homes. In addition, Wallace considers that this total housing land requirement should be increased to include flexibility allowance of 20% and not 10% as presented in the Draft Local Plan. This flexibility will increase the growth target to a **minimum of 22,680 new homes** (see section 4.0). As such, Wallace agrees that in order to meet the future development needs of the Borough in line with national, regional and sub-regional priorities, the minimum figure in the Draft Local Plan needs to exceed the Government’s minimum requirement and accordingly, release land from the Green Belt in accord with the development strategy set out in Policy DEV 1. This increase in the minimum target is necessary to help to ensure the long-term integrity of the Green Belt boundaries beyond the plan period as well as meeting the housing land requirement.

**W2. To ensure Warrington’s revised Green Belt boundaries maintain the permanence of the Green Belt in the long term.**

3.04 Wallace agrees with the Council’s justification for the revision of the Green Belt Boundaries. However, Wallace suggests that more greenfield land is allocated in the Local Plan (an additional 1,890 homes) and as necessary, land is safeguarded to prevent the need for a further Green Belt review before the end of the proposed plan period. This will bring the Draft Local Plan more in line with the NPPF (para. 139) which states that... **“where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period”**.

3.05 Wallace proposes the site submitted known as Land South of Hatton Lane, Stretton (refer to separate representation) for safeguarding in this context. This is a sustainable proposal and an effective site, capable of accommodating around 500 homes. This site is located immediately adjacent to Junction 10 of the M56 and therefore is in a strategic location. This safeguarding of potential development sites supports the delivery of **Objective W1**.

**W3. To strengthen and expand the role of Warrington Town Centre as a regional employment, retail, leisure, cultural and transport hub, whilst transforming the quality of the public realm and making the Town Centre a place where people want to live.**

3.06 Wallace agrees with this objective to strengthen Warrington’s regional role and promote planned growth of the town to ensure Warrington is a place where people want to live and work. The ongoing development of the town centre will provide essential services to support the new housing developments allocated on both brownfield and greenfield sites.

**W4. To provide new infrastructure and services to support Warrington’s growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.**

3.07 Wallace agrees with the principle of providing new infrastructure and services to support Warrington’s continued sustainable growth. As an example, South Warrington Garden Suburb is a vital component of the Draft Local Plan’s development strategy and Policy MD2 ensures that this objective is met through the provision of additional infrastructure such as the strategic link road; additional primary and secondary schooling. It is also agreed that the strategic road link between the A49 and A50 via the proposed neighbourhood centre of this new Garden Suburb is required to support further development. Wallace however,

highlights the need for the programming of housing development to be phased along with the programme of infrastructure delivery to fully integrate its financial delivery. For example, Wallace’s Land at Junction 10, M56, Stretton which is part of the Garden Suburb needs to be a single phase of development in the initial phase of the Local Plan to delivery its leg of the strategic road link through the site and therefore be properly integrated into the site’s delivery. Wallace’s site at Junction 10, M56, Stretton is immediately effective and can be delivered at the start of the Plan. Accordingly, this should be reflected in the Council’s housing trajectory.

3.08 Whilst, the initial business case for the Western Link Road has been made and accepted by Government, the delivery if the high-level bridge and the route through to the A57 Liverpool Road is dependent upon the full business case being made and accepted. In reality, this process may take the next 5 years for approval and pragmatically, the Western Road Link may not be built for some considerable time. As a result, the South West Urban Expansion will only make a minimum contribution to the first 5-10 years of the Plan and is one of the reasons why the Local Plan’s housing requirement needs to be increased from 10% to 20%.

**W5. To secure high quality design which reinforces the character and local distinctiveness of Warrington’s urban area, its countryside, its unique pattern of waterways and green spaces and its constituent settlements whilst protecting, enhancing and embracing the Borough’s historic, cultural, built and natural assets.**

3.09 Wallace agrees with the principle of securing high quality design and local distinctiveness in delivering the Council’s development strategy. Wallace fully expects that the Council’s agreed process of preparing Supplementary Planning Document to guide development for the South Warrington Garden Suburb is in accord with this objective.

**W6. To minimise the impact of development on the environment through the prudent use of resources and ensuring development is energy efficient, safe and resilient to climate change and makes a positive contribution to improving Warrington’s air quality.**

3.10 Wallace agrees with the principle of this objective. The Council’s development strategy and the distribution of its housing land requirement to greenfield housing sites in sustainable locations, supported by required infrastructure, will minimise unnecessary journeys by car. The sustainability of the development strategy will make a positive contribution to improving air quality.

#### SPATIAL STRATEGY AND KEY DIAGRAM

3.11 Wallace highlights the fact that the Local Plan Key Diagram will need to be amended if representation are accepted by the Council prior to the submission of the Draft Local Plan to the Secretary of State for Examination, especially if it is agreed that further greenfield sites are required to meet its housing land requirement.

#### EXCEPTIONAL CIRCUMSTANCES FOR GREEN BELT RELEASE

3.12 Wallace fully supports the Council to release Green Belt land as part of its development strategy. Housing completions from only infill sites within the built-up area is not sufficient to meet the Council’s growth aspirations. This is supported by the evidenced justification of exceptional circumstances in accordance with NPPF (paragraph 137). It should be noted that neighbouring authorities are not able to meet Warrington’s housing needs and this is demonstrated in the Statement of Common Ground. Indeed, all of those authorities adjoining Warrington, have or are in the process of releasing land from the Green Belt to meet their own housing needs.

3.13 Wallace notes that the starting point must be the requirement to ensure that sufficient effective and sustainable housing land is allocated to meet Warrington’s housing land requirements, including the flexibility allowance. The proposed increase of the flexibility allowance from 10% to 20% reflects the dependency of the Council’s development strategy on the early delivery of completions from sites in its Urban Capacity. This is known to be challenging given the specific site circumstances such as land ownership and assembly; ground contamination and potential constraints from neighbouring uses and can delay implementation.

3.14 Wallace considers the requirement to establish the permeance of the revised Green Belt boundaries over the long term should include providing additional greenfield sites especially in South Warrington Garden Suburb and the outlying villages (given the anticipated delays in delivering required infrastructure completions from South West Urban Expansion) as well as providing for Safeguarded Land.

3.15 Whilst Wallace fully agrees that the release of land within the outlying villages will increase housing choice and support viability and vitality of local services, it questions aspects of the site selection methodology used to choose sites for allocation including sustainability appraisal and Green Belt contributions. Based on sustainability principles Wallace has submitted representations which confirm that the Land at Cherry Lane, Lymm and Land at Smithy Brow, Croft are more suitable for allocation than the proposed allocations in these settlements. In a context where, in Wallace’s opinion, further greenfield sites are required to support the Council’s growth aspirations these two sites should be allocated in the Draft Local Plan along with the proposed sites (refer to separate representations for Land at Cherry Lane, Lymm and Land at Smithy Brow, Croft).

## 4. Objective W1

### POLICY DEV1 - HOUSING DELIVERY

- 4.01 As stated, Wallace agrees that the housing requirement to be a minimum over the plan period and 18,900 new homes should represent the **absolute** minimum. In establishing the land requirement over the Plan period, the Council has taken the annual target of 945 homes and added a flexibility of 10%, resulting in a total housing land requirement of **20,790** homes over the plan period. For the reasons highlighted in this representation (mainly about an over dependency of completions in the early years of the Local Plan from brownfield sites which may be delayed simply due to challenging circumstances), Wallace recommends that the flexibility allowance be increased by 20%, up to 22,680. This 20% flexibility allowance is also supported by the House Builders Federation (HBF). This will mean that the Green Belt Requirement will be **8,954** homes – an increase of 1,890 homes.
- 4.02 The Council’s Local Housing Needs Assessment (GL Hearn, March 2019) defined the need for 18,900 homes (945 dpa) which is aligned to achieving jobs growth of 954 jobs per annum. Wallace however notes that this assessment of jobs growth falls below that envisaged in the LEP’s 2017 Strategic Economic Plan (1240 jobs pa) which GL Hearn had previously assessed would require 984 dpa (GL Hearn SHMA Addendum, Oct 2016). Whilst economic forecasts can vary, Wallace notes that:
- The jobs growth which is now being planned for in the Borough is below past rates of jobs growth which the LHN Assessment Table 2 shows as between 1466 – 2175 jobs pa;
  - Whilst “baseline” economic forecast growth has fallen, this does not mean that the economy will necessarily grow at a slower rate than previously thought. The fundamentals which underpin Warrington’s growth potential including its strategic location, and strategic infrastructure investment through Northern Powerhouse Rail, remain. It is providing sufficient employment land supply to support a higher rate of employment growth which is being promoted in the Draft Local Plan. In determining the amount of employment land needed for the Plan period, the Council concluded in the Economic Development Needs Assessment that a projection of past take up rates was the best measure.
  - The Local Housing Needs Assessment applies relatively optimistic assumptions on improvements in economic participation which are justified simply as... “being consistent with the Liverpool City Region SHELMA.” If improvements in participation of older persons are not as strong as predicted, of which there is a realistic prospect, higher in-migration and housing provision would be needed to support the Borough’s economy.
  - The modelling assumes that Warrington continues to see net in-commuting and holds a commuting ratio constant.
- 4.03 Bringing all of these factors together, Wallace considers that the background evidence supports a higher housing land requirement in Warrington than 18,900 homes over the plan period. Indeed, the Council identified a higher housing need in the Regulation 18 consultation on the Plan. This evidence supports the case for the 20% flexibility allowance. If there is a further requirement to allocate land for 1,890 homes in the Green Belt, Wallace considers that priority should be given to sites (up to 200 homes) which can deliver sites in the early years of the plan period. The Council’s development strategy needs to focus on the early delivery of housing completions. This highlights the need for more sites in the outlying villages which can accommodate further housing on sustainable and effective sites with potential to increase the scale of housing in the Garden Suburb. Allocating more land in the South West Urban Expansion is unlikely to release additional housing completions early in the plan period. Wallace recommends 40% (750 homes) of the additional requirement of 1,890 homes is distributed to the outlying villages with the balance of 1,140 homes (60%) allocated to the Garden Suburb. Wallace recommends that Policy DEV1 is modified accordingly.
- 4.04 Wallace is in no doubt that the designation of South Warrington Garden Suburb is a necessary requirement to deliver a sustainable urban extension of Warrington’s urban area in the context of the Council’s growth aspirations. This also secures the completion of the former Warrington New Town and its transition to the New City as promoted by the Council and the Cheshire and Warrington LEP.

### HOUSING DISTRIBUTION AND TRAJECTORY

- 4.05 The Council has agreed that it is necessary to include a provision for flexibility on top of the overall land supply to allow for market choice and in the event that specific sites do not come forward. This is a flexibility allowance of 10%. Wallace has already highlighted the need to review the timing of completions from the proposed allocation at the Waterfront and the South West Urban Extension. Wallace supports both sites as part of the Council’s development strategy but questions the housing trajectory set out in Appendix 1 of the Draft Local Plan. Greater emphasis should be placed on the certainty of completions from greenfield sites in the early years of the Local Plan to meet this housing trajectory.

### FIVE YEAR HOUSING LAND SUPPLY

- 4.06 The NPPF (paragraph 73) states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of a five-year effective housing land supply against the housing requirement.

- 4.07 **The Council’s five-year housing land supply position is not explicitly set out under any policy in the** Pre-Submission Local Plan, nor is it set out in the SHLAA or the Annual Monitoring Report. However, there is available information on the Council’s anticipated housing completion rates in the first five years of the Local Plan (Appendix 1 - the Housing Trajectory). The housing land supply figures set are reproduced in the Table below. This can be used to assess what the five-year land supply position is.

**Table 1. Warrington Land Supply - 2018/19 to 2022/23**

	2020/21	2021/22	2022/23	2023/24	2024/25	Total
<b>Local Plan</b>	1,416	1,367	1,305	1,539	1,432	7,059

- 4.08 In the absence of the Council’s own five-year housing land supply calculation, the following five-year housing land supply calculation has been prepared in the Table below, applying the following assumptions to the requirement:
- The anticipated base date at the point of adoption is 1st April 2020 which means that a stepped housing requirement of 847 homes per annum should apply for the first two years of this calculation; with the higher requirement of 978 homes per annum applying for the final three years;
  - Since the Local Plan’s base date of 1st April 2017, there has been a year of completions totalling 359 homes against the lower stepped housing requirement of 847 homes. The projected completions set out in the housing trajectory have been used to calculate an accumulative shortfall of 1,192 homes.
  - On the basis of the projected completions figures, Warrington will have a Housing Delivery Test performance of 54% at the point of adoption and as a result, a 20% allowance is appropriate in assessing five-year housing land supply. This has been applied to the housing requirement and the shortfall figure, in line with Planning Practice Guidance.
- 4.09 Taking the supply figure drawn from the housing trajectory of the Local Plan results in a marginal surplus of 75 dwellings and when set against the five-year requirement, and results in a position of 5.05 years’ supply.
- 4.10 The Local Plan trajectory’s supply figure of 7,059 dwellings over the five-year period includes development coming forward under the following sources:
- The Town Centre
  - The Wider Urban Area
  - The Warrington Waterfront
  - The Garden Suburb (Phase 1)
  - Settlements (inc. SHLAA sites and Green Belt release)
  - Other SHLAA sites
  - Small Site Allowance

**Table 2. Warrington Five Year Housing Land Supply - Council Assumptions**

<b>Warrington Local Plan 5YHLS as at 1st April 2020</b>	<b>Adoption</b>
Stepped Housing Requirement 1 (1st April 2017 - 31st March 2022)	847
Stepped Housing Requirement 2 (1st April 2022 - 31st March 2027)	978
Sub-Total Requirement (SHR1 x 2; SHR2 x 3)	4628
<b>Shortfall</b>	
Requirement (1st April 2017 - 31st March 2020)	2541
Projected Completions (1st April 2017 - 31st March 2020)	1349
Shortfall	1192
<b>Buffer</b>	
Buffer of Requirement and Shortfall at 20% (Projected HDT results = 54%)	1164
<b>5YHLS Requirement</b>	
Total 5YHLS Requirement (1st April 2020 - 31st March 2025)	6984
Annual (/5)	1397
<b>Land Supply</b>	
Housing Trajectory Supply (Appendix 1 of the Local Plan), 1st April 2020 - 31st March 2025	7059
<b>Position</b>	
5YHLS Surplus	75
5YHLS (Years)	5.05

## 4. Objective W1

- 4.11 The Local Plan (paragraph 3.3.30) states that a key priority is to ensure the phasing of development is related to the delivery of infrastructure. This will have implications for the five-year effective housing land supply.
- 4.12 Further on in the Plan in relation to the Warrington Waterfront specifically, the Local Plan (paragraph 10.1.10) states that development cannot come forward until the funding and the programme for the delivery of the West Link Road has been confirmed. The Plan states that "...This means the first homes are anticipated to be completed in 2023/24 with the first phases of Port Warrington and the Business Park following shortly afterwards"
- 4.13 Whilst an indication of funding has now been approved for the West Link Road (April 2019). The detailed business case for the Road and particular the High-Level Bridge has yet to go forward to Government. There remains a need to acquire land for the scheme; prepare a masterplan for the entire site allocation together with delivery strategy and phasing plan, prepare detailed designs, prepare and submit a planning application, undertake the relevant technical assessments and deal with any mitigation required and ultimately deliver the West Link Road - one of the largest engineering projects in the North West. As a result, completions in 2023/24 are overly optimistic and Wallace considers no completions would occur on this site until beyond 2025.
- 4.14 The Council's Housing Trajectory at Appendix 1 of the Local Plan currently expects 1,252 completions from this site over the period between 1st April 2018 – 31st March 2025. On the basis of what is set out, the Warrington Waterfront cannot be considered deliverable at this scale for the purposes of assessing the five-year housing land supply. The provision of 1,252 homes in the trajectory should be reconsidered for this period. This supports and explains why the flexibility allowance needs to be increased to 20%, delivering an additional 1,890 homes for allocation on other sites.
- 4.15 A revised position is set out in the following table which excludes the Warrington Waterfront contribution from the completions figures between 1st April 2018 – 31st March 2020; and removes it from the anticipated supply between 1st April 2020 – 31st March 2025.

**Table 3. Warrington Five Year Housing Land Supply - Icenj Adjustment**

Warrington Local Plan 5YHLS as at 1st April 2020 - Icenj Adjustment	Adoption
Stepped Housing Requirement 1 (1st April 2017 - 31st March 2022)	847
Stepped Housing Requirement 2 (1st April 2022 - 31st March 2037)	978
Sub-Total Requirement (SHR1 x 2; SHR2 x 3)	4628
<b>Shortfall</b>	
Requirement (1st April 2017 - 31st March 2020)	2541
Projected Completions (1st April 2017 - 31st March 2020)	1034
Shortfall	1507
<b>Buffer</b>	
Buffer of Requirement and Shortfall at 20% (Projected HDT results = 54%)	1227
<b>5YHLS Requirement</b>	
Total 5YHLS Requirement (1st April 2020 - 31st March 2025)	7362
Annual (/5)	1472
<b>Land Supply</b>	
Housing Trajectory Supply (Appendix 1 of the Local Plan), 1st April 2020 - 31st March 2025	6247
<b>Position</b>	
5YHLS Shortfall	1115
5YHLS (Years)	4.24

- 4.16 It is Wallace's position that the Council is only able to demonstrate a maximum of 4.24 years' supply at the point of adoption of the Local Plan; and subject to a more detailed site-by-site assessment it is likely that the position would worsen. As a result, the Local Plan is **not positively prepared, it is not consistent with national policy and is therefore not sound**.
- 4.17 In order for this position to be resolved, there is a need for the Council to address two matters in its review of the Draft Local Plan before submission for Examination:
  1. Consider the proposed rate of development from the existing sites allocated in the Green Belt as part of the proposed development strategy. This will bring forward additional completions such as those smaller, deliverable sites in and around existing settlements able to deliver completions in the short-term. This includes smaller sites forming part of the

- Garden Suburb and are not reliant on the provision of strategic infrastructure; and
- 2. Using the increase in flexibility allowance, identify and allocate additional Green Belt sites in and around the outlying villages and additional sites around the Garden Suburb which can deliver completions in the short-term.

Wallace considers that this essentially a matter of revisions to the detailed programming of its proposed land supply in the Housing Trajectory rather than a major issue with the development strategy.

### SUPPLY BEYOND THE PLAN PERIOD

- 4.18 The policy states that:
 

**"6. Should monitoring indicate that a 5- year deliverable and / or subsequent developable supply of housing land over the Plan Period can no longer be sustained, the Council will give consideration to a review or partial review of the Local Plan."**
- 4.19 Wallace suggests that, to avoid the need for a review, or partial review with regard to developable or deliverable supply of housing land, the Council should consider the removal of Land South of Hatton Lane, Stretton from the Green Belt, for safeguarding. This would provide an additional deliverable site, should housing land supply fail to meet monitoring targets. This site is subject to separate representation and has the capacity for around 500 homes.

**Table 4. Revised table showing land Requirements over the Plan Period**

	Council	Wallace
<b>Annual Target</b>	945	945
<b>2017 to 2037</b>	18,900	18,900
<b>Flexibility</b>	@10% 1,890	@20% 3,780
<b>Total Requirement</b>	20,790	22,680
<b>Urban Capacity</b>	13,726	13,726
<b>Green Belt Requirement</b>	7,064	8,954

### POLICY DEV2 - MEETING HOUSING NEEDS

- 4.20 This policy states that sites of 10 dwellings, or greater than 1,000sqm, will be expected to achieve an affordable housing target of 30%, and 20% within Inner Warrington, inclusive of the town centre. It also states that the Council expects residential developments to provide a mix of housing sizes and types. The policy adds that for developments providing 10 dwellings or more, the Council will seek 20% of homes to provide Building Regulation Standard M4(2) 'Accessible and Adaptable dwellings. Furthermore, sites providing 10 or more dwellings should ensure 20% of provision accommodates the needs of older people.
- 4.21 Wallace supports the intention to provide 30% affordable housing and with the balance of housing type and tenure and suggest that the Council follows the definition of affordable housing as set out in the Annex 2 of the NPPF (2019).
- 4.22 Wallace considers that the early delivery of sites released from the Green Belt can help to boost affordable housing delivery in the short-term.

### POLICY DEV3 - GYPSY & TRAVELLER AND TRAVELLING SHOW PEOPLE PROVISION

- 4.23 Whilst Wallace agrees in principle with this policy, which states that the Council will require... "minimum of 8 permanent pitches to be included within the Garden Suburb allocation", there needs to be careful consideration of their location providing good access to key services such as schools and health care.

### POLICY DEV4 - ECONOMIC GROWTH AND DEVELOPMENT

- 4.24 Wallace agrees with the proposed policy to provide a minimum of 362 hectares of employment land, of which 116 hectares will be located within the Garden Suburb, as this will support the sustainable and long-term development of the Garden Suburb. It will also support the sustainability of Policy DEV1.

### POLICY DEV5 - RETAIL AND LEISURE NEEDS

- 4.25 Wallace supports the proposed addition of the Garden Suburb as a Neighbourhood Centre, and the addition of three local centres at each of the proposed villages within

## 5. Objective W2

### POLICY GB1 - GREEN BELT

- 5.01 Wallace fully supports the review of Green Belt as a starting point for the future development of the Borough in line with many other Local Authorities in the surrounding area. It fully supports the subsequent removal of land from the Green Belt, particularly the land holding and development sites within the Garden Suburb, land to the west of Stretton and the villages of Croft and Lymm (refer to separate representations for these sites).
- 5.02 However, Wallace recommends that the land identified South of Hatton Lane, Stretton, should be removed from the Green Belt and safeguarded for the development during the Plan period. This would ensure the successful delivery of Policies DEV5, DEV4 and DEV1, in line with Objective W1.
- 5.03 Wallace does not agree with the designation of Stretton as a Green Belt settlement as it conflicts with point 3 of the policy as the village lies adjacent to and needs to be included as an integral part of Village A, one of the three villages proposed in the Garden Suburb.

## 6. Objective W3

### POLICY TC1 - TOWN CENTRE AND SURROUNDING AREA

- 6.01 Wallace agrees with Policy TC1 to support the role of Warrington Town Centre, and the regeneration of the surrounding areas proposed within the policy.

## 7. Objective W4

### POLICY INF1 - SUSTAINABLE TRAVEL AND TRANSPORT

- 7.01 Wallace agrees in principle with this policy which outlines the general transport principles of the Council, its position on public transport, rail corridors, freight transport and transport of minerals. This policy supports development in sustainable and accessible locations such as sites within the Garden Suburb, and therefore be a positive measure to ensure the delivery of Objective W1.

### POLICY INF2 - TRANSPORT SAFEGUARDING

- 7.02 Wallace agrees with this policy to safeguard transport routes, which will ensure development does not have an adverse impact on primary transport routes. The safeguarding of transport routes and their delivery within the South Warrington Garden Suburb will be clarified through the master planning process set out in its proposed Supplementary Planning Document.

### POLICY INF3 - UTILITIES AND TELECOMMUNICATIONS

- 7.03 Wallace agrees with this policy for utilities and communications, which will ensure development will deliver necessary physical infrastructure, whilst ensuring development does not have an adverse impact upon the existing utilities and communications network. The services required to deliver the scale of development proposed in the South Warrington Garden Suburb will be clarified during the process to prepare its agreed Supplementary Planning Document.

### POLICY INF4 - COMMUNITY FACILITIES

- 7.04 Wallace agrees with this policy to ensure the safeguarding and provision of community infrastructure as this is necessary to support the sustainable delivery of South Warrington Garden Suburb, outlined within Policy DEV1.

### POLICY INF5 - DELIVERING INFRASTRUCTURE

- 7.05 Wallace agrees in principle with the policy to ensure the delivery of required infrastructure to avoid impacting on existing communities. Any upgrade or installation of new infrastructure requirements need to be restricted to only that necessary to deliver the scale of development for individual allocations unless there are cumulative assessments agreed between neighbouring sites such as the individual villages in the Garden Suburb.

## 8. Objective W5

### POLICY DC1 - WARRINGTON'S PLACES

- 8.01 Wallace supports the policy and expects the ongoing Supplementary Planning Document for the Garden Suburb to guide the principles in three village Masterplans and Neighbourhood Centre.

### POLICY DC2 - HISTORIC ENVIRONMENT

- 8.02 Wallace supports the general principles of this policy.

### POLICY DC3 - GREEN INFRASTRUCTURE

- 8.03 Wallace agrees with this policy and the development of the Garden Suburb will accord with the policy through the design detail to be incorporated in the Supplementary Planning Document.

### POLICY DC4 - ECOLOGICAL NETWORK

- 8.04 Wallace supports the general principles of this policy to consider the impact of development upon ecology.

### POLICY DC5 - OPEN SPACE, OUTDOOR SPORT AND RECREATION PROVISION

- 8.05 Wallace agrees with this policy for Open Space. The design guidance in the Supplementary Planning Document will accord with this policy.

### POLICY DC6 - QUALITY OF PLACE

- 8.06 Wallace agrees with this policy to ensure quality of place and through the Supplementary Planning Document, the proposals for the Garden Suburb will accord with this policy.

## 9. Objective W6

### POLICY ENV1 - WASTE MANAGEMENT

- 9.01 Wallace agrees with the general principles underlying this policy for Waste Management.

### POLICY ENV2 - FLOOD RISK AND WATER MANAGEMENT

- 9.02 Regarding policy ENV2 for flood risk and water management, Wallace agrees with the principles and requirement for development proposals. Wallace agrees that development should be focussed in these areas at lowest risk of flooding. None of the sites promoted by Wallace promote development within areas at risk from flooding.

### POLICY ENV7 - RENEWABLE AND LOW CARBON ENERGY DEVELOPMENT

- 9.03 Whilst Wallace agrees in principle with the general intent of this policy, the solutions required for each of the three villages and Neighbourhood Centre in the Garden Suburb may vary and agreed solutions will be part of the guidance in the Supplementary Planning Document.

### POLICY ENV8 - ENVIRONMENTAL AND AMENITY PROTECTION

- 9.04 Wallace agrees with this policy and through the guidance in the Supplementary Planning Document, the development of the Garden Suburb will accord with this policy.

## 10. Site Allocations-Urban Warrington

### POLICY MD1 - WARRINGTON WATERFRONT

10.01 Wallace agrees with the allocation of Warrington Waterfront for 2,000 new homes as it contributes to the continued and positive growth of Warrington, in line with Objective W1. However, as stated previously, Wallace considers that its housing trajectory is challenging due to the considerable lead-in timescale required for the Western Link Road. Wallace recommends that the housing trajectory set out in the Plan is amended accordingly.

### POLICY MD2 - WARRINGTON GARDEN

10.02 Wallace supports the allocation of Warrington Garden Suburb and its removal from Green Belt. The site offers a prime opportunity for the provision of a high-quality urban development based on three villages and neighbourhood centre with a new country park, associated employment space and new schools.

10.03 Wallace has worked collaboratively with the landowners with interests in the Garden Suburb including Homes England as well as the Council, and Warrington & Co to ensure that Policy MD2 accurately reflects the ongoing work regarding the best approach to delivering the Garden Suburb. The way forward to co-ordinate the master planning of the Garden Suburb and deliver all of the requirements set out in Policy MD2 is now agreed to be through Supplementary Planning Document. This process has now commenced. The Supplementary Planning Document will take into account but supersede the Development Framework prepared by the Council for illustrative purposes.

10.04 Wallace along with other land owners and developers/house builders forming part of the Garden Suburb intend to make individual representations about the wording and intentions in Policy MD2 to ensure that there is the necessary flexibility in its interpretation allowing a prompt commencement and the necessary scale of completions in the delivery of the Garden Suburb. Wallace considers that completions for The Garden Suburb shown in the Housing Trajectory are a minimum.

### POLICY MD3 - SOUTH WEST URBAN EXTENSION

10.05 Similar to Warrington Waterfront, Wallace agrees with the allocation of the South West Urban Extension for 1,600 new homes as it contributes to the continued and positive growth of Warrington, in line with Objective W1. However, the reality is that the land associated with the Western Link Road will not be able to be delivered at the start of the Plan period and as such this needs to be reflected in the reduced scale of completions outlined in the Housing Trajectory.

## 11. Site Allocations-Croft

### POLICY OS2 - CROFT

11.01 Wallace is supportive of the growth planned for Croft subject to the addition of its share of the further flexibility of 20% rather than 10%. It is essential that the Council allocates further land for 750 homes in the outlying settlements, as recommended in the response to Policy DEV1 above. Land for a further 750 homes should be allocated proportionately to the outlying villages of which Croft should accommodate an additional 52 homes (7%).

11.02 The Council has only allocated land adjacent to Deacons Close, Croft to provide 75 homes. Wallace recommends that its site at Land off Smithy Brow, Croft is allocated for 90 homes in response to the updated housing land requirement. The evidence, submitted as part of the separate representation, confirms that this proposal for 90 homes is a more sustainable development opportunity and does not make a greater contribution to the Green Belt than the proposed allocation at Deacons Close.

## 12. Site Allocations-Lymm

### POLICIES OS5, OS6, OS7, OS8 | ALLOCATIONS FOR LYMM

12.01 Wallace is supportive of the growth planned for Lymm subject to the addition of its proportionate share of the additional housing land requirement resulting from the increase in the flexibility allowance from 10% to 20% for the reasons submitted in this representation. Land for a further 750 homes should be allocated proportionately to the outlying villages of which Lymm should accommodate an additional 310 homes (41%).

12.02 Wallace recommends that its site at Land at Cherry Lane, Lymm is allocated for 200 homes plus service site for GP practice (if

required) or playing fields for Cherry Tree Primary School in response to the updated housing land requirement, arising from the addition of an increased flexibility allowance. The evidence, submitted as part of the separate representation, confirms that this proposal is a more sustainable development opportunity and does not make a greater contribution to the Green Belt than the other four sites proposed allocation in Lymm.

## 13. Monitoring & Review

### POLICY M1 - LOCAL PLAN MONITORING AND REVIEW

13.01 Wallace agrees with the general principle of Policy M1 for local plan monitoring and review. However, to avoid the requirement for a full Green Belt Review within the lifetime of the Local Plan, Wallace recommends that a 20% flexibility allowance is added to the assessment of the housing land requirement, resulting in further allocations in the outlying villages and the Garden Suburb for a further 1,890 homes.

13.02 In addition, Wallace recommends the safeguarding of additional land which could be released for development within the plan period. Wallace proposes that the Land to the South of Hatton Lane, Stretton is removed from Green Belt and designated as safeguarded land, to provide for housing land in line with Policy W1, should monitoring reveal that housing completions fall below those set out in the Housing Trajectory and the requirement for a 5 year effective housing land supply is not maintained.

## 14. Supporting Documents

### LOCAL PLAN VIABILITY ASSESSMENT

- 14.01 This Report tests the development plan and policies within the Local Plan. It concludes by stating that the proposed requirement for 20% and 30% affordable housing in Inner Warrington and the rest of the Borough respectively, is viable over the plan period. Wallace agrees with this conclusion.
- 14.02 The Local Plan Viability Assessment considers the infrastructure to be delivered in the Garden Suburb. The Council has made informed assumptions about the technical specifications and cost of delivery for infrastructure such as schools; motorway junctions and transport requirements along with proposed solutions for payments to deliver the infrastructure such as Section 106 financial contributions. The Council has agreed that Supplementary Planning Document process which has now commenced will clarify the specifications and requirements of infrastructure upgrades (through detailed working with all parties involved in the delivery of the Garden Suburb and agree the financial framework including mechanisms for their delivery.

### SUSTAINABILITY APPRAISAL

- 14.03 The Sustainability Appraisal outlines the key issues regarding sustainability and rates each site allocation against a sustainability score. It states that the policies for site allocations including Policy MD2 for the Warrington Garden Suburb will have a significant positive effect with regards to air quality.
- 14.04 Wallace notes that its site at Lymm has not been subject to the Council's Sustainability Appraisal process and considers that its potential site at Lymm has not been properly considered in the Local Plan site assessment process. Consequently, Sustainability Appraisals have been undertaken for all the sites controlled by Wallace (in both Lymm and Croft) and compared with the allocated sites proposed in these respective settlements. Wallace's impartial assessment has shown that the proposals put forward by Wallace are more sustainable than the sites to be allocated in the Local Plan.
- 14.05 A more detailed breakdown of these sustainability assessments is provided in the accompanying representations regarding the development proposals for each of Wallace's sites.
- 14.06 Wallace recommends that the sites at Lymm (200 homes) and Croft (90homes) should be allocated in the Local Plan.

### HERITAGE IMPACT ASSESSMENTS

- 14.07 Five Heritage Impact Assessments have been undertaken by the Council regarding the sites:
- South Warrington Garden Suburb;
  - Peel Hall;
  - South West Urban Extension;
  - Warrington Waterfront; and
  - Outlying Settlements.
- 14.08 The Garden Suburb Heritage Impact Assessment details how the Garden Suburb allocation may impact the setting of local heritage assets. It concludes that this allocation will have negligible effects if suitable mitigations measures are employed. Wallace agrees with this conclusion.

### HABITAT REGULATIONS ASSESSMENT

- 14.09 The Habitat Regulations Assessment concludes that the Local Plan will have no adverse effects upon the integrity of European sites, either alone, or in combination with other plans and projects. Wallace agrees with this conclusion.

### URBAN CAPACITY ASSESSMENT

- 14.10 This statement outlines how the Council utilised the SHLAA Land Supply, Master Planning Land Supply and EDNA Land Supply to assess the capacity of the existing urban area to accommodate new development.
- 14.11 Wallace notes that the Urban Capacity Assessment concludes that there is sufficient urban capacity to accommodate housing land for 13,729 dwellings up to 2037. Wallace recommends that the Council should be cautious about planning for significant levels of housing completions on brownfield sites, particularly in the initial phase of the plan period. Detailed investigations often uncover potentially compromised sites due to contamination; land assembly and other issues. These will delay the rate of development and lower the rate of completions projected in the Urban Capacity housing trajectory. To ensure that the Council's development strategy maintains a five year effective housing land supply at all times, Wallace recommends a higher flexibility allowance is applied to the housing land requirement (from 10% to 20%) and hence there is a need for increased Green Belt land release of 1,890 homes.

### WARRINGTON ECONOMIC DEVELOPMENT NEEDS ASSESSMENT

- 14.12 This Assessment outlines issues that need to be addressed with regard to Warrington's Economic Development by assessing the property, industrial, warehouse and office markets; the wider economic geography of Warrington; and the Employment Land Supply. It concludes with 6 recommendations which have been taken into account during the development of the Draft Local Plan. The most appropriate forecasting method for employment land is a projection forward of past take-up rates that considers both strategic and local needs. This suggests that the Borough has a further land need, additional to the current realistic supply, of 277.80 ha, to 2037.
- 14.13 Wallace support these recommendations and also support the identification of Warrington Waterfront, Birchwood, the M56 Corridor, and M62 Junction 9 as areas of search for new employment land.

### WARRINGTON MULTI MODAL TRANSPORT MODEL LOCAL PLAN REPORTS

- 14.14 This includes 3 reports that cover:
- Sensitivity testing;
  - Transport modelling; and
  - a validation report.
- 14.15 These reports detail the transport impacts of the Submission Version of the Local Plan and assess the impact of potential options upon traffic pressures. It identifies where there may be issues in the network over the plan period up to 2036, and states that through targeted interventions, impacts can be limited. Wallace agrees with these conclusions. Wallace notes that the form and capacity of the Strategic Link Road proposed through its Land at Junction 10, M56, Stretton will be defined during the preparation of the Supplementary Planning Document for Warrington Garden Suburb.

### LOCAL PLAN AIR QUALITY REPORT

- 14.16 This Report models air quality within the Borough over the plan period, taking into account the growth aspirations of Warrington. It finds that current air quality in Warrington is typical of urban areas across the UK and is mainly caused by vehicles, with more polluted areas near busier and more congested roads. It is stated in the Warrington Borough Council Local Plan Air Quality Modelling document that:
- “The detailed NO<sub>2</sub> modelling presented for the year 2026 demonstrates that the situation is expected to improve significantly. On average concentrations were predicted to fall by 22%, and the number of properties in excess of the national and European objectives was predicted to drop by 95%. A similar, albeit less marked change was predicted for particulates: PM2.5 concentrations were predicted to fall by 5%. For 2036, further significant improvements were predicted. In summary the burden of poor air quality on people's health is expected to reduce in Warrington considerably in the future, as emissions are reduced, despite the planned growth described in the draft Local Plan.”**
- 14.17 Based on this, the impact of air pollution within the Borough will be controlled as the development strategy's infrastructure requirements are delivered. This includes the introduction of supporting infrastructure promoting walking and cycling, improved public transport services and the re-distribution of traffic through the introduction of new road links. Deterioration of air quality is not a reason to restrict development.

### LOCAL HOUSING NEEDS ASSESSMENT

- 14.18 The local housing needs assessment uses standard methodology in the NPPF to assess the economic-led housing need and informs Policy DEV1 for Housing Delivery. Wallace has responded to the proposed development strategy outlined in Policy DEV1. Because of the Housing Trajectory's proposed completion rates from the various sources of housing land supply, considers that the flexibility allowance needs to increase from 10% to 20%.

### OPTIONS AND SITE ASSESSMENT TECHNICAL REPORT

- 14.19 This Report summarises the methodology and process that the Council has taken when reviewing options and assessing sites. It also outlines the evidence base underpinning the Allocations within the Local Plan. Wallace questions the specific site assessment for the sites at Land at Cherry Lane, Lymm and Land at Smithy Brow, Croft. Both of these sites score higher (and therefore better) using the Sustainability Checklist approach promoted by central government. Both of these sites can offer a valuable contribution to meeting the housing land requirements in the outlying settlements.

## 14. Supporting Documents

### GREEN BELT ASSESSMENT

14.20 The Green Belt Assessment assesses each parcel of land's contribution to the 5 core purposes of Green Belt Land. It concludes by suggesting that the Council develops an exceptional circumstances case to justify alteration to the Green Belt Boundaries and use this assessment during site selection. Wallace supports the release of Green Belt land in order to deliver greenfield sites for Warrington's housing land requirement. As with the sustainability assessments undertaken by the Council, Wallace also questions the individual Green Belt Site Assessments completed for the four sites controlled by Wallace. This was previously raised in the Regulation 18 Preferred Development Option Consultation. The issues arising from both the Sustainability Appraisals and Green Belt Assessments are discussed in the representations regarding the development proposals for each of Wallace's sites.

### WARRINGTON GARDEN SUBURB DEVELOPMENT FRAMEWORK

14.21 The Council has clarified that the Warrington Garden Suburb Development Framework is illustrative and was prepared to contribute to the Local Plan's Evidence Base. Supplementary Planning Document (SPD) for the Garden Suburb is now ongoing and will provide all requirements set out in Policy MD2.

14.22 These requirements will include the following:

- Development Framework for Warrington Garden Suburb;
- Masterplans for each of the three Garden Villages;
- Masterplan for the Neighbourhood Centre;
- Masterplan for the Strategic Employment Area;
- Masterplan for the greenspace infrastructure including the Country Park;
- Locations and proposals for the infrastructure listed in paragraph 5 of Policy MD2.1 *Key Land Use and Infrastructure Requirements and Policy MDA 2.3 Detailed Site-specific Requirements*;
- Details of the funding mechanisms and phasing for these Infrastructure Requirements as set out in Policy MDA 2.2 *Delivery and Phasing*;
- Details of the routes for the strategic movement corridor (set within the land controlled by the working group), its technical specification, and the funding mechanism to deliver its phased delivery;
- Outline technical specifications for the delivery of common infrastructure and specific infrastructure requirements for the Garden Suburb; and
- Phasing plan and programme for the infrastructure and development proposals referred to in Policy MD2.

14.23 As part of this process, the SPD will define the funding mechanisms along with technical specifications to deliver the infrastructure requirements and their phasing, as set out in Policy MD 2.

14.24 At this stage, a working group of these parties plus the Council and Warrington & Co has been formed. The key objective is to work collaboratively, both with each member of the working group, and also with the Council as Planning Authority, with the objectives of providing technical guidance demonstrating the viability and effectiveness of the ongoing delivery of the components of South Warrington Garden Suburb.

### INFRASTRUCTURE DELIVERY PLAN

14.25 The Infrastructure Delivery Plan (IDP) identifies and prioritises infrastructure provision as part of an integrated approach to planning and infrastructure development.

14.26 Wallace is supportive of the early identification of infrastructure requirements in the Borough, clearly advocated by the NPPF (NPPF paragraph 8 sets out that the delivery of infrastructure is key to the creation of sustainable communities), whilst delivery of infrastructure is key to the identification of strategic policies within a local plan (NPPF paragraph 20). Linked to this is the effective collaboration with infrastructure providers from early in the plan making process (NPPF paragraph 25).

14.27 Wallace is supportive of the Infrastructure Delivery Plan but notes that, given the need to deliver infrastructure in the Garden Suburb in the early stages of the Local Plan, it is important that further work relating to viability and infrastructure costs is progressed. This is to be clarified through the Supplementary Planning Document for the Garden Suburb

14.28 Along with the Infrastructure Delivery Plan, Wallace continues to share concerns about the use of any Grampian style wording as part of the Infrastructure Delivery Strategy which is currently referred to in Policy MD2. Wallace particularly questions the requirement to 'confirm' the 'funding and programme' for the Green Infrastructure and Country Park, local strategic road network, community infrastructure within the Neighbourhood Centre and garden village community infrastructure prior to **any** further residential development (paragraph 14 of Policy MD2). Wallace understands that reference to 'confirmation' relates to the approval of funding mechanisms.

14.29 Wallace understands the need to ensure that the Garden Suburb represents a comprehensive and integrated development, with the appropriate level of infrastructure in place to support it at the right time. The approach to ensure delivery of its appropriate infrastructure, will be set out in the SPD as described above.

### STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA 2018)

14.30 The SHLAA 2018 updates the previous SHLAA for Warrington, reviewing the status and conclusions previously reached for sites, and assessing new emerging sites. All four sites controlled by Wallace are assessed within the SHLAA, considering their current Green Belt status.

14.31 As discussed earlier, the SHLAA has shown that land supply will become increasingly constrained over the short term. On this basis, it is important that the Council properly considers the contribution that Land South of Hatton Lane, Stretton, Land at Cherry Lane, Lymm and Land at Smithy Brow, Croft will make to increase the rate of completions expected from its land supply in the initial period of the Local Plan.

## 15. Commentary on Modifications to Policy MD2

- 1.1. Wallace Land Investments (Wallace) supports Policy MD2 – *Warrington Garden Suburb* providing the requirements and guidance for the ongoing master planning and delivery of the Garden Suburb. Policy MD2 designates land currently in the Green Belt for 7,400 homes and 116 ha of employment land to be developed as three villages with Neighbourhood Centre and Country Park along with the necessary supporting infrastructure such as secondary and primary schools, strategic link road and green network.
- 1.2. The Garden Suburb is part of the Council’s development strategy to meet its growth aspirations and part of its housing land requirements up to 2037 and beyond.
- 1.3. Policy MD2 sets the policy framework for further necessary and comprehensive work to be undertaken to ensure that in its delivery, the planning policy and other requirements defined in this Policy are fully met and that the subsequent development proposals subject to planning applications are fully in accord with the adopted Local Plan.
- 1.4. The Council has agreed that the process of undertaking this further work will be through a Supplementary Planning Document to produce a comprehensive Development Framework for the Garden Suburb. The Supplementary Planning Document process commenced in May 2019 and its scope will deliver the requirements set out Policy MD2, namely:
- Development Framework for Warrington Garden Suburb;
  - Masterplans for each of the three Garden Villages;
  - Masterplan for the Neighbourhood Centre;
  - Masterplan for the Strategic Employment Area;
  - Masterplan for the greenspace infrastructure including the Country Park;
  - Locations and proposals for the infrastructure listed in paragraph 5 of Policy MD2.1 *Key Land Use and Infrastructure Requirements* and Policy MDA 2.3 *Detailed Site-specific Requirements*;
  - Details of the funding mechanisms and phasing for these Infrastructure Requirements as set out in Policy MDA 2.2 *Delivery and Phasing*;
  - Details of the routes for the strategic movement corridor, its technical specification, and the funding mechanism to deliver its phased delivery;
  - Outline technical specifications for the delivery of common infrastructure and specific infrastructure requirements for the Garden Suburb along with their respective funding mechanisms; and
  - Phasing plan and programme for the infrastructure and development proposals referred to in Policy MD2.
- 1.5. The Supplementary Planning Document will be a joint collaboration between the Council, Warrington & Co., Homes England and the other landowners, developers and house builders required to deliver the proposals set out in Policy MD2. This approach is confirmed in the letter issued by Savills (Appendix 1) which explains the collaborative approach which is being undertaken.
- 1.6. The Council acknowledges that the Illustrative Development Concept for the Garden Suburb (Figure 18 of the Draft Local Plan) is for illustrative purposes only. This Illustrative Development Concept will help inform but will be superseded by the SPD process to deliver the Development Framework for the Garden Suburb along with its supporting masterplans for each village, the Neighbourhood Centre, and Country Park as well as the other requirements set out in Policy MD2.
- 1.7. For clarity, the Development Framework referred to Policy MD2 is not the illustrative concept prepared by AECOM on the Council’s behalf but will be the Development Framework prepared through the agreed SPD process, addressing the scope in Policy MD2, as summarised in paragraph 1.4 above. This SPD will be subject to consultation on its completion after the adoption of the Local Plan and a material consideration in the determination of future applications for parts of the Garden Suburb.
- 1.8. Wallace considers that there is potential for confusion by the public about the intent of Policy MD2 as what is being referred to when reference is made to the Garden Suburb’s development framework and does make sufficient reference to the future SPD process as the mechanism to finalise all of the matters referred to Policy MD2.
- 1.9. Wallace is also concerned about the overall length of the wording in the Policy and its sub-sets, as well as the need for greater precision in the text to clarify its intent along with the need for cross-reference to other Local Plan policies.
- 1.10. Modifications have also been made to add flexibility about the Garden Suburb’s on-site requirements. This is to avoid reaching conclusions about the scale of infrastructure requirements which may be revised subsequently but are already enshrined in policy or its supporting text. For example, modifying *7 forms of entry for primary schooling to additional primary schooling*, allows for further detailed impact assessment work to be undertaken as part of the SPD process to reach its conclusion about the scale of mitigation agreed, allowing the possibility for changing circumstances. At all times, modifications made still require mitigation and the necessary infrastructure will be delivered.
- 1.11. Wallace objects to length and repetition of wording in Policy MD2 and to avoid ambiguity, proposes that it should be modified for the reasons stated above. The Modifications proposed are presented in Appendix 2 as tracked changes along with a reasoning and justification for these changes. A clean copy of the resultant modified Policy MD2 is also presented in Appendix 3.
- 1.12. All modifications are intended to add clarity and improve understanding of this key Policy for the benefit of the public; the SDP process and subsequent development management purposes.
- 1.13. Wallace confirms that the modified and more concise version of Policy MD2 does not change the intentions or requirements of Policy MD2.

**Appendix 1.**  
Savills Letter

17<sup>th</sup> June 2019  
17.06.19 Joint Landowner Letter.doc

F.A.O. Michael Bell  
Planning Policy and Programmes Manager  
Warrington Borough Council  
New Town House  
Buttermarket Street  
Warrington  
WA1 2NH



Jeremy Hinds

By email: [REDACTED]

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savills.com

**Warrington Proposed Submission Version Local Plan  
South Warrington Garden Suburb Draft Allocation and Policy**

Dear Michael,

Thank you for providing us with the opportunity to comment on the Warrington Proposed Submission Version Local Plan through the Regulation 19 formal consultation process.

As you are aware, there are nine interested parties within the proposed South Warrington Garden Suburb (Draft Policy MD2) who have come together to form a landowner group.

These parties are:

- Hollins Strategic Land
- Homes England
- Langtree
- Lone Star Land Ltd
- Mulbury Homes (Grappenhall) Ltd
- Taylor Wimpey
- Wallace Land Investments
- Moseley family (Private Landowners)
- Garnett family (Private Landowners)

The key objective of the group is to work collaboratively to secure the allocation and delivery of the Garden Suburb and we are therefore writing to express our joint support to the principle of the draft South Warrington Garden Suburb allocation.

The group are committed to working with the Council to formulate an appropriate Supplementary Planning Document (SPD) which provides a framework upon which future planning applications can rely. We hope that you will facilitate key dialogue with us as the Local Plan progresses.

We trust that the above is satisfactory and we would welcome the opportunity to discuss this further with you.

Should you have any questions please do not hesitate to contact Savills on the details above.

Yours sincerely

[REDACTED]

**Savills on behalf of the Warrington Garden Suburb Landowner Group**

[REDACTED]

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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## **Appendix 2.**

Tracked Changes and Commentary on Policy

## **10.2 Warrington Garden Suburb**

- 10.2.1 Warrington Garden Suburb will be developed as a sustainable urban extension to the south east of the main urban area of Warrington. The intention is to create an attractive, well-designed and distinctive place set within a strong landscape framework of open spaces and parkland. The place will be well served by new community infrastructure and a network of sustainable transport links maximising travel by walking, cycling and public transport.
- 10.2.2 The Garden Suburb will deliver around 7,400 homes and a major new employment location of 116 hectares at the junction of the M6 and M56. It will provide a high quality environmental setting and enable development to be comprehensively planned with new homes and employment land phased in accordance with the delivery of wide ranging supporting infrastructure.
- 10.2.3 Around 5,100 homes will be delivered within the Plan Period. A further 2,300 homes will come forward beyond the Plan Period, providing land for Warrington's long term development needs and ensuring the permanence of the revised Green Belt boundaries.
- 10.2.4 The new residential and working community will be supported by:
- A Neighbourhood Centre comprising a secondary school, primary school, local shops, a new health facility, leisure facility and other community facilities.
  - Three Local Centres comprising primary schools, local shops and other local community facilities
  - A new Country Park and extensive areas of open space and recreation provision.
  - Extensive highways and public transport improvements
- 10.2.5 The Garden Suburb will comprise three new Garden Villages. Two of these villages will be extensions to existing communities at Grappenhall Heys and at Appleton Cross / Pewterspear. The third will be a new community at the eastern end of the Garden Suburb adjacent to the A50.
- 10.2.6 The Garden Villages will provide a range of housing types with a particular focus on family housing, homes for older people and provision of affordable housing. Each village will be served by a Local Centre comprising a primary school and local community facilities. The villages will each provide local parks and smaller areas of green space.
- 10.2.7 A new Neighbourhood Centre will be centrally located and provide higher level services for the Garden Suburb as a whole. The Neighbourhood Centre will include a new secondary school, a combined health and leisure centre, sports pitches, a supermarket and other local shops and services. It will also provide higher density homes creating opportunities for younger people and those looking to get onto the housing ladder.

- 10.2.8 A new Country Park will be located to the north of the Neighbourhood Centre, providing a major recreational and ecological resource for the Garden Suburb communities and for existing communities across the wider south and central Warrington areas.
- 10.2.9 Appleton Thorn will maintain its distinct identity as a separate village, but its residents will benefit from the transformation of infrastructure that the Garden Suburb will provide, including the services within the Neighbourhood Centre.
- 10.2.10 The Garden Suburb will provide a major new Employment Area as an extension of the existing Appleton Thorn/Barleycastle industrial estates. This will make a significant contribution to meeting Warrington's future employment land needs. It will comprise large scale distribution, logistics, industrial uses and offices, benefiting from its accessibility to the motorway network at the intersection of the M6 and M56.
- 10.2.11 New development will be designed to support walking and cycling for local journeys within the Garden Suburb and to other local destinations. Improved public transport services will provide access to the Town Centre and other Employment Areas in the wider Warrington area.
- 10.2.12 The first phases of development will be supported by a new strategic link. This will connect the individual villages and the Neighbourhood Centre within the Garden Suburb itself and provide additional connections from the Garden Suburb to the A49 and A50, easing congestion across the wider south Warrington area. Major improvements will also be made to Junction 10 of the M56 and Junction 20 of the M6 early in the Plan Period.
- 10.2.13 Further transport infrastructure will be required to support later phases of development towards the end of the Plan Period and beyond. It is anticipated that this will include significant public transport improvements and potentially a further crossing of the Manchester Ship Canal.
- 10.2.14 The new Green Belt boundaries in this area will be formed by the M56 to the south of the Garden Suburb and predominantly the A50 (Knutsford Road) to the east. These will ensure the permanence of the Green Belt over the long term and provide a logical boundary to the extent of the Garden Suburb.
- 10.2.15 The development of the Garden Suburb will ensure that important ecological assets within the site are preserved and enhanced. Provision will be made within the Garden Suburb's extensive areas of open space to provide additional habitats and enhance biodiversity, linking into Warrington's wider Green Infrastructure Network.
- 10.2.16 New development will preserve and enhance the heritage assets within the Garden Suburb and will be designed to respect heritage assets in the surrounding area. Of particular note are the scheduled ancient monument at Bradley Hall Moat, the Bridgewater Canal and nearby Conservation Areas in Grappenhall.

- 10.2.17 The first phase of residential development within the Garden Suburb is underway with permission already granted for the Homes England sites at Pewterspear, Appleton Cross and Grappenhall Heys.
- 10.2.18 No further residential phases can come forward until the funding and the programme for the delivery of a strategic link have been confirmed. This means the first homes in the second phase of residential development are anticipated to be completed in 2023/24.
- 10.2.19 Transport mitigation measures will be identified to offset the impact of traffic generated by the employment development sites on Junctions 9 and 10 of the M56 and Junction 20 of the M6, in agreement with Highways England, with funding streams and trigger points identified for the delivery of the required works to enable development to come forward in the early years.
- 10.2.20 Community infrastructure within each of the villages and the Neighbourhood Centre will be required in early phases of development to ensure new residents have access to essential local services and to alleviate pressure on other facilities in south Warrington.
- 10.2.21 The phasing programme will mean that around 5,100 homes and the full extent of the Employment Area will be completed by the end of the Plan period in 2037. There is the potential for a further 2,300 homes beyond the Plan period.
- 10.2.22 The infrastructure requirements for the Garden Suburb will be kept under review throughout the Plan period. The detailed infrastructure requirements for development later in the Plan Period and beyond the Plan Period will be confirmed through future formal reviews of the Local Plan.
- 10.2.23 The development concept diagram has been informed by an extensive masterplanning exercise, working with developers and taking into account representations made to the Preferred Development Options Consultation. It provides:
- a definitive site boundary for the overall Garden Suburb;
  - illustrative locations of the Neighbourhood Centre, three Garden Villages and the employment allocation; and
  - illustrative green infrastructure network including the Country Park and green links.
- 10.2.24 Key development requirements and principles, including details of phasing and the requirement for a delivery strategy, are set out in the allocation Policy below. The final form of development will be determined through the preparation of a comprehensive development framework which the Council will prepare as a Supplementary Planning Document (SPD).

## Policy MD2 - Warrington Garden Suburb

### MD2.1 Key Land Use and Infrastructure Requirements

1. Land to the south east of Warrington, bounded by the M56 to the south and predominantly the A50 to the east (as illustrated on the Proposals Map and Figure 3), will be removed from the Green Belt and allocated as the Garden Suburb sustainable urban extension.
2. The Garden Suburb will deliver approximately 7,400 homes, ~~and~~ 116 hectares of employment land, and a centrally located District/Local Centre and other supporting uses. Around 5,100 homes, the centre and all of the employment land will be delivered within the Plan Period.
3. The Garden Suburb will comprise three Garden Villages, a central ~~located Neighbourhood Centre~~ District/local centre, a significant employment zone and an extensive green infrastructure network of open spaces and parkland, ~~as illustrated in the Development Concept diagram.~~
4. The existing inset settlement of Appleton Thorn will retain its distinct ~~identity~~ identity and be defined by areas of countryside separating the settlement from new development. Any development within the Appleton Thorn settlement boundary, as defined by Map 2 in the Neighbourhood Plan (or Proposals Map to the Local Plan), must conform with the policies of the Appleton Parish Thorn Ward Neighbourhood Development Plan.
5. The Garden Suburb will be supported by a wide range of infrastructure ~~as follows, and delivered in a coherent and comprehensive manner to ensure one development proposal does not prejudice another.~~ A Development Framework Supplementary Planning Document will be prepared and consulted upon to guide the development of the site and provide for the following:
  - a. A range of housing tenures, types and sizes, including affordable homes, custom and self-build plots and supported and Extra Care housing in accordance with Policy DEV2.
  - b. ~~A minimum of an additional 7 forms of entry of~~ Additional Primary School provision
  - c. ~~A new Additional~~ Secondary School to provide a minimum of 6 forms of entry provision
  - d. ~~A Neighbourhood Centre~~ centrally located District/Local centre comprising a supermarket and local shops (with no more than 5,000 sq m of A1 retail floorspace unless supported by a Retail Impact Assessment in line with Policy DEV5), and close links to a new health facility, leisure facilities and other community facilities with no more than 5,000 sq m of A1 retail floorspace unless supported by a Retail Impact Assessment in line with Policy DEV5.
  - e. Three ~~local centres~~ small Neighbourhood Centres/hubs located centrally in each of the three Garden Villages providing local shops and other community facilities of no more than 500 sq m floorspace in total unless supported by a Retail Impact Assessment in line with Policy DEV5.~~A~~ Extensive areas of Green Infrastructure, including a major new Country Park and extensive areas of strategic green infrastructure and playing pitches to serve the new and wider community and open space within residential developments in accordance with the Council's open space standards set out in Policy DC5 and informed by a Green

**Commented [CG1]:** Cross reference to Local Plan.

**Commented [CG2]:** Cross reference to the Local Plan's Glossary of definitions.

**Commented [CG3]:** The Council has confirmed that this diagram is for illustrative purposes and should refer to the Development Framework for the Garden Suburb produced through the Supplementary Planning Document (SPD) process.

**Commented [CG4]:** Need to reference the SPD process.

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**Commented [CG5]:** Need to cross reference to relevant policy in Local Plan.

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**Commented [CG6]:** Further impact assessment work to be carried out through SPD process to finalise mitigation measures. Need to avoid enshrining mitigation in policy before SPD is consulted and approved.

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Infrastructure Strategy to be included in the Development Framework.-

~~g. Provision of playing pitches.~~

~~f. Provision of a range of smaller areas of open space within the residential development to serve the new community in accordance with the Council's open space standards.~~

~~h.g. A Gypsy and Traveller site with the capacity for 8 pitches.~~

~~h.h. A Community Recycling Centre. A comprehensive package of transport improvements, for both on-site and off-site works including the delivery of a network of routes for a range of modes that allow for connections between development sites to be made effectively and efficiently.-~~

~~i.i. Landscape buffers and ecological mitigation and enhancement.~~

~~k.i. Sustainable Flood mitigation and drainage including exemplary sustainable drainage systems (SuDS) with only foul flows connecting to the existing public sewer, as informed by a Foul and Surface Water Strategy and Clean Water Strategy to form part of the Development Framework SPD.~~

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Commented [CG8]: All mitigation measures need to be undertaken to adoptable standards to meet housebuilding requirements.

### MDA 2.2 Delivery and Phasing

~~6. The Council is committed to working with landowners / developers to prepare a the Development Framework SPD for the Garden Suburb as a whole, including more detailed masterplans for each of the three Garden Villages and the Neighbourhood-District/Local Centre, together~~

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~~7.6. with a delivery strategy and phasing plan in order to ensure comprehensive and coordinated development.~~

~~8. The Development Framework will be prepared as a Supplementary Planning Development (SPD).~~

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~~9. The Development Framework will confirm the strategic elements of the Green Space and transport networks, the infrastructure necessary to support the Garden Suburb as a whole and will define the boundaries of the 3 villages, the Neighbourhood Centre, the Country Park and areas to be protected for green infrastructure. It must be informed by a site wide Green Infrastructure Strategy and site wide Foul and Surface Water Strategy and site wide Clean Water Strategy.~~

Commented [CG9]: Deleted to avoid confusion about the origin of the Development Framework.

~~10.7. The Mmasterplans within the Development Framework SPD will identify individual development parcels to be developed in the Plan period, development parcels to be developed beyond the Plan period and areas to be protected as open space and / or for green infrastructure. The masterplans will provide the basis for planning applications for individual development parcels.~~

~~11. The masterplans will provide the basis for planning applications for individual development parcels. Development Framework SPD~~

~~12.-~~

~~13.8. The delivery strategy must ensure that a delivery strategy, including a programme of delivery, and funding mechanism is put in place to secure proportionate contributions from all developers within the Garden Suburb to fund and deliver the wide ranging infrastructure required to support the Garden Suburb.~~

Commented [CG10]: Clarifies the need to finalise the funding mechanisms necessary to deliver infrastructure.

~~14. The SPD will conform to the requirements of this Policy and be subject to public-~~  
Proposed Submission Version Local Plan 2019

~~consultation. Landowners / developers will be expected to work closely with the Council to ensure that the SPD is deliverable.~~

~~15.9.~~ The first phase of residential development comprises Homes England's sites at Grappenhall Hayes, Appleton Cross and Pewterspear that already have planning permission.

~~16.10.~~ No further residential development will be permitted until the Development Framework SPD has been approved and the following has taken place, unless a development proposal is able to physically and financially deliver the necessary essential infrastructure required to support the development and the wider objectives of this policy:

**Commented [CG11]:** Introduces necessary flexibility to allow further parts of the Garden Suburb to be developed in specific circumstances.

- a. The funding mechanism and programme for delivery of the Green Infrastructure Network including Country Park have been confirmed.
- b. The funding mechanism and ~~the~~ programme for the delivery of a strategic link to connect the Garden Suburb to the local and strategic road network have been confirmed.
- c. The funding mechanism and ~~the~~ programme for the delivery of community infrastructure within the Neighbourhood-District/Local Centre have been confirmed.
- d. Where development is within one of the Garden Villages, the funding mechanism and ~~the~~ programme of the delivery of the community infrastructure within the relevant Garden Village have been confirmed.

~~17.11.~~ The new employment development will not be permitted until the funding and the programme for the delivery of the improvements at Junction 9 of the M56 and Junction 20 of the M6 have been agreed with key stakeholders, including Highways England and the Local Highway Authority.

~~18.12.~~ A review of infrastructure to support phases of residential development later in the Plan Period and phases of residential development beyond the Plan Period will be undertaken through future reviews of the Local Plan.

~~19. No residential development parcels within these phases will be permitted until the additional infrastructure requirements have been assessed and the funding and the programme of delivery for additional infrastructure requirements have been confirmed.~~

**Commented [CG12]:** Not necessary.

### MDA2.3 Detailed Site-specific Requirements

#### New Homes

~~20.13.~~ New homes will be delivered in the Garden Suburb across the following broad locations/areas to be agreed in the Development Framework SPD. Initial master planning work suggests the following locations could accommodate:

- a. Grappenhall Heys – approximately 2,800 homes (2,100 within the Plan Period)
- b. Appleton Cross / Pewterspear – approximately 2,100 homes (1,500 within the Plan Period)
- c. New Garden Village ~~adjacent to A50 – approximately 1,800 homes (1,000 within the Plan Period)~~ and central District/Local Centre 2,500 homes (approximately 1,500 within the Plan Period)
- d. ~~Garden Suburb Neighbourhood Centre – approximately 700 homes (500 within the Plan Period)~~

~~21. A range of housing tenures, types and sizes will be required in order to ensure development contributes to meeting the Borough's general and specialist housing needs, including family homes with gardens, specific provision for older people and for younger people looking to purchase their first home.~~

~~22. In accordance with Policy DEV2 a minimum of 30% of homes should be affordable.~~

~~23. Supported housing for older people should be provided within each of the three Garden Villages.~~

~~24.14. Specific provision should be made for a residential care facility providing a minimum of 80 bed spaces with in close proximity the Neighbourhood District/Local Centre. Extra Care provision will also be supported in each of the three Garden Villages.~~

~~25. Specific provision should be made for self build/custom build plots in each of the three Garden Villages, subject to local demand as demonstrated by the Council's self build register.~~

~~26. Specific provision should be made for a Gypsy and Traveller site with the capacity for 8 pitches within the Garden Suburb.~~

~~27.15. To reflect the area's urban fringe location adjacent to the open countryside and the significant levels of green infrastructure proposed throughout the Garden Suburb, the residential development within the Garden Villages should be constructed to an average minimum density of 20dph based on gross site area.~~

~~28.16. To reflect the proximity to services and greater distance from heritage and ecological constraints, residential development within the Neighbourhood Centre and in close proximity to the District/Local centre should be at higher residential densities, with an average minimum density of 30dph based on gross site area.~~

#### Employment Area

~~29.17. The development will be required to deliver up to 116 hectares of employment land to meet strategic and local employment needs on land allocated at the junction of the M6 and M56, as illustrated on the Proposals Map.~~

~~30.18. The employment land is allocated for distribution and industrial uses (B8, B1c and B2). Other suitable roadside uses could also be justified in certain locations of the employment site subject to satisfying other relevant policies within the Local Plan.~~

#### Community Facilities

~~21. The residential development will be required to deliver a minimum of an additional 7 Forms of Entry of Primary School provision and a new secondary school providing a minimum of 6 Forms of Entry to meet the need for school places that will be generated from the Garden Suburb as a whole.~~

~~22. The residential development will be required to deliver a new combined health and leisure facility and other local community facilities required to meet the needs of the new residential population.~~

**Commented [CG13]:** Repetition- matters already addressed in the Local Plan.

**Commented [CG14]:** Cross reference to Local Plan.

**Commented [CG15]:** Avoid enshrining mitigation measures in Policy or supporting text. Mitigation will be agreed through SPD process.

~~23-19.~~ The secondary school, a new primary school, ~~and the combined~~ health and leisure facilities should be located within or in proximity to the Neighbourhood District/Local Centre.

~~24.~~ ~~The Neighbourhood Centre will serve the entire Garden Suburb and should be located in a central location within the overall allocation site.~~

~~25.~~ ~~The Neighbourhood Centre should also include local shops, a supermarket, and other appropriate local services and community facilities. Any proposal for retail development above 2,500 sq.m. in the Neighbourhood Centre will require a retail needs assessment and be subject to the sequential assessment set out in Policy DEV5.~~

~~26-20.~~ A new or extended primary school should be located within or in proximity to the Local small Neighbourhood Centres/hubs in each of the three Garden Villages.

~~27.~~ ~~The new Local Centres will provide focal points for the proposed villages and should be located centrally within these areas.~~

~~28.~~ ~~Small scale units up to 500 sq.m in total within Use Class A1, A2, A5 and D1 will be supported in the Local Centres in order to provide for day to day needs. Any proposal for additional retail floorspace will require a retail needs assessment and be subject to the sequential assessment set out in Policy DEV5.~~

~~21.~~ ~~The Local Centre~~The small Neighbourhood Centre/hub in Appleton Cross will be required to provide a new health facility.

#### Green Infrastructure Network

~~39-22.~~ The Development Framework SPD and Green Infrastructure Strategy will define the Strategic Green Infrastructure Network and set out how it will be delivered and protected thereafter.

~~40-23.~~ This should ensure the provision of an accessible, comprehensive and high quality network of multi-functional green spaces which connect the three Garden Villages, the Neighbourhood District/Local Centre, Appleton Thorn and the Employment Area within the Garden Suburb and provide links into Warrington's wider green space network and a Country Park within the Garden Suburb.

~~41.~~ ~~An illustration of the Strategic Green Infrastructure Network is shown on the development concept diagram.~~

~~42.~~ ~~A new Country Park is required to be delivered on land in the northern part of the Garden Suburb. This will provide a significant amount of green space for recreation as well as protecting and enhancing biodiversity.~~

~~43.~~ ~~The design of the Country Park and wider green space network should ensure that the Country Park is accessible for new residents within the allocation site as well as existing residents across wider southern and central Warrington.~~

**Commented [CG16]:** Need for consistency with definition in Local Plan glossary.

44. Areas of open green space will be provided across the Garden Suburb as part of the Strategic Green Infrastructure Network. These areas will deliver an important function in providing open space, walking and cycling routes and ensuring separation between the individual Garden Villages, the Neighbourhood Centre and Appleton Thorn. These areas will deliver an important function in providing open space, walking and cycling routes and ensuring connectivity between the component parts of the garden Suburb.

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45. Once defined, development will not be permitted which compromises the function of the Strategic Green Infrastructure Network.

46. Each Garden Village and the Neighbourhood Centre should provide a range of types and sizes of open space in accordance with the Council's open space standards. This should include provision of local parks and gardens; natural and semi-natural greenspace; equipped and informal play areas; sports pitches; and allotment plots.

47. The delivery of equipped play provision should be in the form of a range of LEAP's and NEAP's (including the appropriate 20 or 30 metre buffers) on the application site.

48. Further provision of open space will be required within the proposed Employment Area.

49. The residential and employment development should ensure the long term management arrangements for the Country Park and wider green space network within the Garden Suburb.

Commented [CG17]: The SPD process will finalise the greenspace network for the Garden Suburb in terms of location and

#### Natural Environment

50-24. The Development Framework SPD and Green Infrastructure Strategy will need to demonstrate how development within the Garden Suburb will protect and enhance existing wildlife corridors and provide new corridors to link the site into Warrington's wider biodiversity network and the Great Manchester Wetlands Nature Improvement Area and ensure the site contributes to the wider objectives of the Northern Forest.

51-25. The layout of development within the Garden Suburb should take account of existing landscape features, including watercourses, woodlands and significant hedgerows.

52-26. Wetland habitats including ponds within the site are of key importance and should be integrated within the Strategic Green Infrastructure Network.

53-27. Where an individual development parcel will result in the loss of habitat, approval of a plan of mitigation in line with Policy DC4 will be required before any application for that development parcel is permitted. The mitigation package should ensure a net gain in biodiversity and the new and improved habitat should be located within the Garden Suburb's Strategic Green Infrastructure Network.

Commented [CG18]: Mitigation needs to comply with and cross reference back to Policy DC4.

#### Green Belt Boundary

54. The Green Belt boundary to the south of the Garden Suburb is defined by the M56 and to the east predominantly by the A50 (Knuttsford Road).

55. Development at the eastern and southern extents of the Garden Suburb will be required

~~to respect the Green Belt boundary;~~

**Commented [CG19]:** Green Belt boundaries will be defined in Local Plan.

#### Transport and Accessibility

~~56,28.~~ A comprehensive package of transport improvements will be required to support the Garden Suburb, ~~and will be detailed within the Development Framework (SPD).~~ Required improvements for the next phase of residential development and the employment development will include:

**Commented [CG20]:** Necessary cross reference to SPD process.

- a. Ensuring appropriate access arrangements for the site as a whole and for individual development parcels.
- b. Improved cycling and walking routes well related to the green infrastructure network; connecting the new and existing residential areas, the ~~District/Local~~ Neighbourhood Centre, ~~the small Neighbourhood Centre/hubs~~ Local Centres within the Garden Villages and the Employment Area.
- c. Providing public transport enhancements to connect the new community with the Employment Area and Neighbourhood Centre; Stockton Heath; Warrington Town Centre and employment opportunities within the wider Warrington area.
- d. A new strategic link connecting the individual villages and the ~~Neighbourhood~~ District/Local Centre within the Garden Suburb itself and providing additional connections from the Garden Suburb to the A49 and A50.
- e. Improvements to increase capacity at Junctions 9 and 10 of the M56 and Junction 20 of the M6.
- f. Other network improvements as identified by an appropriate Transport Assessment.

~~57. The layout of individual development parcels within the Garden Suburb should maximise the potential for walkable neighbourhoods, with a legible hierarchy of routes, providing new footpaths and cycleways that link to existing networks beyond the site.~~

~~Good accessibility to public transport services should be provided by ensuring that the bus routes and bus stops within the site are accessible by pedestrians and cyclists via effective footpaths and cycle routes.~~

**Commented [CG21]:** Repetitive and should be deleted.

~~58-29. The Development Framework SPD will set out how the development should contribute to the Council's wider aspiration of enhancing the Bridgewater Canal as a recreational resource and for the Canal's tow path to provide a cycle and pedestrian link across the Borough.~~

#### Utilities and Environmental Protection

~~59. A site wide foul and surface water strategy will be required across the Garden Suburb as a whole, incorporating appropriate Sustainable Drainage Systems (SUDS) and flood alleviation measures. The surface water strategy will be required to improve on greenfield run off rates. Development proposals will be expected to incorporate infiltration SuDS and SuDS with multi-functional benefits in preference to traditional underground storage systems. Particular consideration will need to be given to the eastern Garden Village which is downstream from existing communities at risk of flooding in Grappenhall.~~

~~60. The surface water strategy should be integrated with the site's Green Infrastructure Strategy in order to maximise ecological and potentially recreational benefits.~~

~~61. Improvements to the water supply and sewerage network will be required, ensuring that surface water drainage is not combined with foul discharge. A site wide clean water strategy will also be required.~~

**Commented [CG22]:** Deleted- all utilities and services will accord with adoptable standard agreed with utility provider.

~~62-30. Development within the Garden Suburb must not unduly impact on the operation of the existing gas pipeline which crosses the site.~~

~~63. A Community Recycling Centre to serve the Garden Suburb and the wider south Warrington area should be provided within the Garden Suburb.~~

~~64. The Garden Suburb should be designed to mitigate the impacts of climate change and be as energy efficient and water efficient as possible. The Council will seek to secure a decentralised energy system across the Garden Suburb as a whole that will use or generate renewable or other forms of low carbon energy in accordance with Policy ENV7.~~

~~65. Development proposals may be required to assess the impact on the groundwater environment and incorporate appropriate mitigating measures.~~

~~66. The design of the Garden Suburb must incorporate appropriate measures to mitigate any noise and air quality impacts from the M6, M56, A49 and A50 Knutsford Road.~~

**Commented [CG23]:** All matters already dealt with through Local Plan policy framework.

#### Historic Environment

~~67-31. The Garden Suburb contains a number of heritage assets, including listed buildings, locally listed buildings and a Scheduled Monument. Development will be required to be designed in order to ensure that these assets and their settings are conserved and, where appropriate, enhanced within the context of the overall development, through appropriate mitigation measures, having regard to the Garden Suburb Heritage Impact Assessment.~~

68.32. The Bradley Hall Moated Site Ancient Monument is of particular significance given its location within the Employment Area. Masterplans within the Development Framework SPD will incorporate a landscape buffer between the monument and new employment development to preserve the immediate open setting of the moated site.

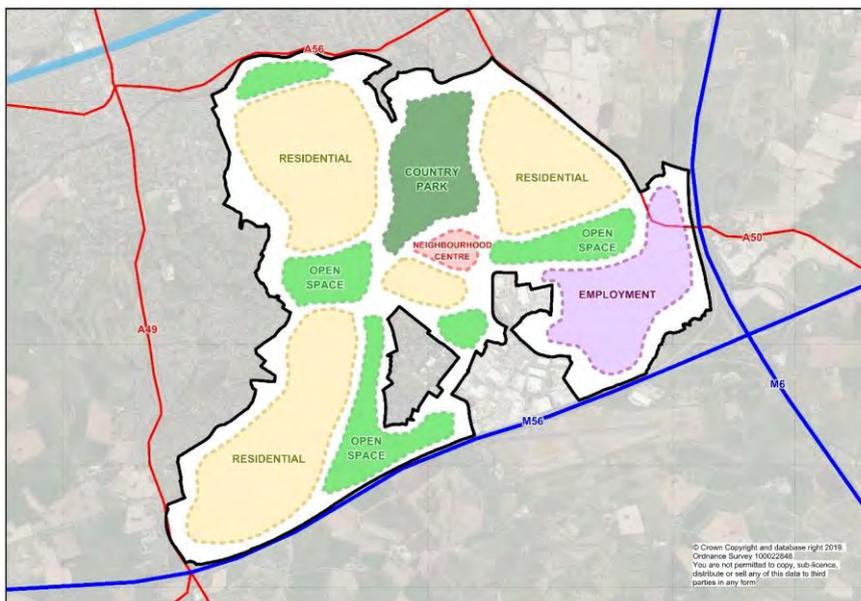
69.33. The settings of the following Conservation Areas within proximity of the Garden Suburb will be preserved and enhanced through ensuring that new development is set back by an appropriate distance, is limited in height to no more than two storeys and where possible provides an enhanced landscape buffer:

- a. Grappenhall Village Conservation Area.
- b. Victoria Road / York Drive Conservation Area.
- c. Ackers Road / Marlborough Crescent Conservation Area.

#### Why we have taken this approach

10.2.25 The Garden Suburb performed well in terms of the assessment against the objectives of the Local Plan, the requirements of the Government's National Planning Policy Framework and the Local Plan's Sustainability Appraisal.

Figure 18 – Illustrative Development Concept for Garden Suburb



10.2.26 The Garden Suburb is of a sufficient scale to provide a wide range of services to support a new residential and working community in this part of Warrington, including a Neighbourhood Centre, new Local Centres, a secondary school, up to 4

new primary schools, health and leisure facilities and a network of open spaces. Its location will also ensure good access to the surrounding urban area including Grappenhall, Stockton Heath District Centre, Warrington Town centre and the adjoining major Employment Area (both existing and proposed).

- 10.2.27 The ability to make such a significant and sustainable contribution towards meeting Warrington's long term development needs provides the exceptional circumstances required to justify the removal of the Garden Suburb from the Green Belt.
- 10.2.28 The Allocation Policy will ensure that development comes forward in a comprehensive manner with phasing of development linked to the provision of infrastructure.
- 10.2.29 It will also provide a strong Green Belt boundary in this part of Warrington and will ensure that development preserves and enhances the built and natural environment.
- 10.2.30 Given the scale of development within the Garden Suburb, development will continue beyond the plan period. This will ensure that land is available for Warrington's future development needs and maintains the long term permanence of the Green Belt.
- 10.2.31 The Council, working with Homes England and the other landowners within the Garden Suburb, will be taking a leading role in coordinating the delivery of the Garden Suburb.
- 10.2.32 Individual developers promoting sites have confirmed their commitment to ensuring a comprehensive form of development and their support of the build rates which have informed the development trajectory. They are supportive of the preparation of a development framework (to be prepared as a SPD) including masterplans for the Garden Suburb and the delivery of the wide range of infrastructure that is required to support the delivery of the Garden Suburb. The cost of the required infrastructure will be shared on a proportionate basis between the developers.
- 10.2.33 The Allocation Policy, together with the Council's Infrastructure Delivery Plan, sets out key infrastructure requirements to support the Garden Suburb. The greatest level of detail is provided for infrastructure required to support the first phases of development. Detailed infrastructure requirements for later phases of development and for development beyond the current Plan Period will be confirmed through future reviews of the Local Plan.

### **Key Evidence**

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- Planning Practice Guidance (PPG)
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### **Delivery Partners**

- Developers and landowners promoting land within the urban extension
- Warrington & Co
- United Utilities
- Highways England
- Natural England
- Local Nature Partnership

## **Appendix 3.**

Clean Copy of Policy

## **10.2 Warrington Garden Suburb**

- 10.2.1 Warrington Garden Suburb will be developed as a sustainable urban extension to the south east of the main urban area of Warrington. The intention is to create an attractive, well-designed and distinctive place set within a strong landscape framework of open spaces and parkland. The place will be well served by new community infrastructure and a network of sustainable transport links maximising travel by walking, cycling and public transport.
- 10.2.2 The Garden Suburb will deliver around 7,400 homes and a major new employment location of 116 hectares at the junction of the M6 and M56. It will provide a high quality environmental setting and enable development to be comprehensively planned with new homes and employment land phased in accordance with the delivery of wide ranging supporting infrastructure.
- 10.2.3 Around 5,100 homes will be delivered within the Plan Period. A further 2,300 homes will come forward beyond the Plan Period, providing land for Warrington's long term development needs and ensuring the permanence of the revised Green Belt boundaries.
- 10.2.4 The new residential and working community will be supported by:
- A Neighbourhood Centre comprising a secondary school, primary school, local shops, a new health facility, leisure facility and other community facilities.
  - Three Local Centres comprising primary schools, local shops and other local community facilities
  - A new Country Park and extensive areas of open space and recreation provision.
  - Extensive highways and public transport improvements
- 10.2.5 The Garden Suburb will comprise three new Garden Villages. Two of these villages will be extensions to existing communities at Grappenhall Heys and at Appleton Cross / Pewterspear. The third will be a new community at the eastern end of the Garden Suburb adjacent to the A50.
- 10.2.6 The Garden Villages will provide a range of housing types with a particular focus on family housing, homes for older people and provision of affordable housing. Each village will be served by a Local Centre comprising a primary school and local community facilities. The villages will each provide local parks and smaller areas of green space.
- 10.2.7 A new Neighbourhood Centre will be centrally located and provide higher level services for the Garden Suburb as a whole. The Neighbourhood Centre will include a new secondary school, a combined health and leisure centre, sports pitches, a supermarket and other local shops and services. It will also provide higher density homes creating opportunities for younger people and those looking to get onto the housing ladder.

- 10.2.8 A new Country Park will be located to the north of the Neighbourhood Centre, providing a major recreational and ecological resource for the Garden Suburb communities and for existing communities across the wider south and central Warrington areas.
- 10.2.9 Appleton Thorn will maintain its distinct identity as a separate village, but its residents will benefit from the transformation of infrastructure that the Garden Suburb will provide, including the services within the Neighbourhood Centre.
- 10.2.10 The Garden Suburb will provide a major new Employment Area as an extension of the existing Appleton Thorn/Barleycastle industrial estates. This will make a significant contribution to meeting Warrington's future employment land needs. It will comprise large scale distribution, logistics, industrial uses and offices, benefiting from its accessibility to the motorway network at the intersection of the M6 and M56.
- 10.2.11 New development will be designed to support walking and cycling for local journeys within the Garden Suburb and to other local destinations. Improved public transport services will provide access to the Town Centre and other Employment Areas in the wider Warrington area.
- 10.2.12 The first phases of development will be supported by a new strategic link. This will connect the individual villages and the Neighbourhood Centre within the Garden Suburb itself and provide additional connections from the Garden Suburb to the A49 and A50, easing congestion across the wider south Warrington area. Major improvements will also be made to Junction 10 of the M56 and Junction 20 of the M6 early in the Plan Period.
- 10.2.13 Further transport infrastructure will be required to support later phases of development towards the end of the Plan Period and beyond. It is anticipated that this will include significant public transport improvements and potentially a further crossing of the Manchester Ship Canal.
- 10.2.14 The new Green Belt boundaries in this area will be formed by the M56 to the south of the Garden Suburb and predominantly the A50 (Knutsford Road) to the east. These will ensure the permanence of the Green Belt over the long term and provide a logical boundary to the extent of the Garden Suburb.
- 10.2.15 The development of the Garden Suburb will ensure that important ecological assets within the site are preserved and enhanced. Provision will be made within the Garden Suburb's extensive areas of open space to provide additional habitats and enhance biodiversity, linking into Warrington's wider Green Infrastructure Network.
- 10.2.16 New development will preserve and enhance the heritage assets within the Garden Suburb and will be designed to respect heritage assets in the surrounding area. Of particular note are the scheduled ancient monument at Bradley Hall Moat, the Bridgewater Canal and nearby Conservation Areas in Grappenhall.

- 10.2.17 The first phase of residential development within the Garden Suburb is underway with permission already granted for the Homes England sites at Pewterspear, Appleton Cross and Grappenhall Heys.
- 10.2.18 No further residential phases can come forward until the funding and the programme for the delivery of a strategic link have been confirmed. This means the first homes in the second phase of residential development are anticipated to be completed in 2023/24.
- 10.2.19 Transport mitigation measures will be identified to offset the impact of traffic generated by the employment development sites on Junctions 9 and 10 of the M56 and Junction 20 of the M6, in agreement with Highways England, with funding streams and trigger points identified for the delivery of the required works to enable development to come forward in the early years.
- 10.2.20 Community infrastructure within each of the villages and the Neighbourhood Centre will be required in early phases of development to ensure new residents have access to essential local services and to alleviate pressure on other facilities in south Warrington.
- 10.2.21 The phasing programme will mean that around 5,100 homes and the full extent of the Employment Area will be completed by the end of the Plan period in 2037. There is the potential for a further 2,300 homes beyond the Plan period.
- 10.2.22 The infrastructure requirements for the Garden Suburb will be kept under review throughout the Plan period. The detailed infrastructure requirements for development later in the Plan Period and beyond the Plan Period will be confirmed through future formal reviews of the Local Plan.
- 10.2.23 The development concept diagram has been informed by an extensive masterplanning exercise, working with developers and taking into account representations made to the Preferred Development Options Consultation. It provides:
- a definitive site boundary for the overall Garden Suburb;
  - illustrative locations of the Neighbourhood Centre, three Garden Villages and the employment allocation; and
  - illustrative green infrastructure network including the Country Park and green links.
- 10.2.24 Key development requirements and principles, including details of phasing and the requirement for a delivery strategy, are set out in the allocation Policy below. The final form of development will be determined through the preparation of a comprehensive development framework which the Council will prepare as a Supplementary Planning Document (SPD).

## Policy MD2 - Warrington Garden Suburb

### MD2.1 Key Land Use and Infrastructure Requirements

1. Land to the south east of Warrington, bounded by the M56 to the south and predominantly the A50 to the east (as illustrated on the Proposals Map and Figure 3), will be removed from the Green Belt and allocated as the Garden Suburb sustainable urban extension.
2. The Garden Suburb will deliver approximately 7,400 homes, 116 hectares of employment land, and a centrally located District/Local Centre and other supporting uses. Around 5,100 homes, the centre and all of the employment land will be delivered within the Plan Period.
3. The Garden Suburb will comprise three Garden Villages, a central located District/local centre, a significant employment zone and an extensive green infrastructure network of open spaces and parkland.
4. The existing inset settlement of Appleton Thorn will retain its distinct identity and be defined by areas of countryside separating the settlement from new development. Any development within the Appleton Thorn settlement boundary, as defined by Map 2 in the Neighbourhood Plan (or Proposals Map to the Local Plan), must conform with the policies of the Appleton Parish Thorn Ward Neighbourhood Development Plan.
5. The Garden Suburb will be supported by a wide range of infrastructure, and delivered in a coherent and comprehensive manner to ensure one development proposal does not prejudice another. A Development Framework Supplementary Planning Document will be prepared and consulted upon to guide the development of the site and provide for the following:
  - a. A range of housing tenures, types and sizes, including affordable homes, custom and self- build plots and supported and Extra Care housing in accordance with Policy DEV2.
  - b. Additional Primary School provision
  - c. Additional Secondary School provision
  - d. A centrally located District/Local centre comprising a supermarket and local shops (with no more than 5,000 sq m of A1 retail floorspace unless supported by a Retail Impact Assessment in line with Policy DEV5), and close links to a new health facility, leisure facilities and other community facilities with no more than 5,000 sq m of A1 retail floorspace unless supported by a Retail Impact Assessment in line with Policy DEV5.
  - e. Three small Neighbourhood Centres/hubs located centrally in each of the three Garden Villages providing local shops and other community facilities of no more than 500 sq m floorspace in total unless supported by a Retail Impact Assessment in line with Policy DEV5.
  - f. Extensive areas of Green Infrastructure, including a major new Country Park and playing pitches to serve the new and wider community and open space within residential developments in accordance with the Council's open space standards set out in Policy DC5 and informed by a Green Infrastructure Strategy to be included in the Development Framework.
  - g. A Gypsy and Traveller site with the capacity for 8 pitches.

- h. A Community Recycling Centre. A comprehensive package of transport improvements, for both on-site and off-site works including the delivery of a network of routes for a range of modes that allow for connections between development sites to be made effectively and efficiently.
- i. Landscape buffers and ecological mitigation and enhancement.
- j. Sustainable flood mitigation and drainage as informed by a Foul and Surface Water Strategy and Clean Water Strategy to form part of the Development Framework SPD.

## **MDA 2.2 Delivery and Phasing**

6. The Council is committed to working with landowners / developers to prepare the Development Framework SPD for the Garden Suburb as a whole, including more detailed masterplans for each of the three Garden Villages and the District/Local Centre, together with a delivery strategy and phasing plan in order to ensure comprehensive and coordinated development.
7. Masterplans within the Development Framework SPD will identify individual development parcels to be developed in the Plan period, development parcels to be developed beyond the Plan period and areas to be protected as open space and / or for green infrastructure. The masterplans will provide the basis for planning applications for individual development parcels.
8. The Development Framework SPD must ensure that a delivery strategy, including a programme of delivery, and funding mechanism is put in place to secure proportionate contributions from all developers within the Garden Suburb to fund and deliver the wide ranging infrastructure required to support the Garden Suburb.
9. The first phase of residential development comprises Homes England's sites at Grappenhall Hayes, Appleton Cross and Pewterspear that already have planning permission.
10. No further residential development will be permitted until the Development Framework SPD has been approved and the following has taken place, unless a development proposal is able to physically and financially deliver the necessary essential infrastructure required to support the development and the wider objectives of this policy:
  - a. The funding mechanism and programme for delivery of the Green Infrastructure Network including Country Park have been confirmed.
  - b. The funding mechanism and programme for the delivery of a strategic link to connect the Garden Suburb to the local and strategic road network have been confirmed.
  - c. The funding mechanism and programme for the delivery of community infrastructure within the District/Local Centre have been confirmed.
  - d. Where development is within one of the Garden Villages, the funding mechanism and programme of the delivery of the community infrastructure within the relevant Garden Village have been confirmed.
11. The new employment development will not be permitted until the funding and the programme for the delivery of the improvements at Junction 9 of the M56 and Junction 20 of the M6 have been agreed with key stakeholders, including Highways England and the Local Highway Authority.

12. A review of infrastructure to support phases of residential development later in the Plan Period and phases of residential development beyond the Plan Period will be undertaken through future reviews of the Local Plan.

### **MDA2.3 Detailed Site-specific Requirements**

#### **New Homes**

13. New homes will be delivered in the Garden Suburb across the following broad locations/areas to be agreed in the Development Framework SPD. Initial master planning work suggests the following locations could accommodate:

- a. Grappenhall Heys – approximately 2,800 homes (2,100 within the Plan Period)
- b. Appleton Cross / Pewterspear – approximately 2,100 homes (1,500 within the Plan Period)
- c. New Garden Village and central District/Local Centre 2,500 homes (approximately 1,500 within the Plan Period)

14. Specific provision should be made for a residential care facility in close proximity to the District/Local Centre. Extra Care provision will also be supported in each of the three Garden Villages.

15. To reflect the area's urban fringe location adjacent to the open countryside and the significant levels of green infrastructure proposed throughout the Garden Suburb, the residential development within the Garden Villages should be constructed to an average minimum density of 20dph based on gross site area.

16. To reflect the proximity to services and greater distance from heritage and ecological constraints, residential development within and in close proximity to the District/Local centre should be at higher residential densities, with an average minimum density of 30dph based on gross site area.

#### **Employment Area**

17. The development will be required to deliver up to 116 hectares of employment land to meet strategic and local employment needs on land allocated at the junction of the M6 and M56, as illustrated on the Proposals Map.

18. The employment land is allocated for distribution and industrial uses (B8, B1c and B2). Other suitable roadside uses could also be justified in certain locations of the employment site subject to satisfying other relevant policies within the Local Plan.

#### **Community Facilities**

19. The secondary school, a new primary school, health and leisure facilities should be located within or in proximity to the District/Local Centre.

20. A new or extended primary school should be located within or in proximity to the small Neighbourhood Centres/hubs in each of the three Garden Villages.

21. The small Neighbourhood Centre/hub in Appleton Cross will be required to provide a new health facility.

### Green Infrastructure Network

22. The Development Framework SPD and Green Infrastructure Strategy will define the Strategic Green Infrastructure Network and set out how it will be delivered and protected thereafter.

23. This should ensure the provision of an accessible, comprehensive and high quality network of multi-functional green spaces which connect the three Garden Villages, the District/Local Centre, Appleton Thorn and the Employment Area within the Garden Suburb and provide links into Warrington's wider green space network and a Country Park within the Garden Suburb.

These areas will deliver an important function in providing open space, walking and cycling routes and ensuring connectivity between the component parts of the garden Suburb.

### Natural Environment

24. The Development Framework SPD and Green Infrastructure Strategy will need to demonstrate how development within the Garden Suburb will protect and enhance existing wildlife corridors and provide new corridors to link the site into Warrington's wider biodiversity network and the Great Manchester Wetlands Nature Improvement Area and ensure the site contributes to the wider objectives of the Northern Forest.

25. The layout of development within the Garden Suburb should take account of existing landscape features, including watercourses, woodlands and significant hedgerows.

26. Wetland habitats including ponds within the site are of key importance and should be integrated within the Strategic Green Infrastructure Network.

27. Where an individual development parcel will result in the loss of habitat, approval of a plan of mitigation in line with Policy DC4 will be required before any application for that development parcel is permitted.

### Transport and Accessibility

28. A comprehensive package of transport improvements will be required to support the Garden Suburb and will be detailed within the Development Framework (SPD). Required improvements for the next phase of residential development and the employment development will include:

- a. Ensuring appropriate access arrangements for the site as a whole and for individual development parcels.
- b. Improved cycling and walking routes well related to the green infrastructure network; connecting the new and existing residential areas, the District/Local Centre, the small Neighbourhood Centre/hubs Local Centres within the Garden Villages and the Employment Area.
- c. Providing public transport enhancements to connect the new community with the Employment Area and Neighbourhood Centre; Stockton Heath; Warrington Town Centre and employment opportunities within the wider Warrington area.
- d. A new strategic link connecting the individual villages and the District/Local Centre within the Garden Suburb itself and providing additional connections from the Garden

Suburb to the A49 and A50.

e. Improvements to increase capacity at Junctions 9 and 10 of the M56 and Junction 20 of the M6.

f. Other network improvements as identified by an appropriate Transport Assessment.

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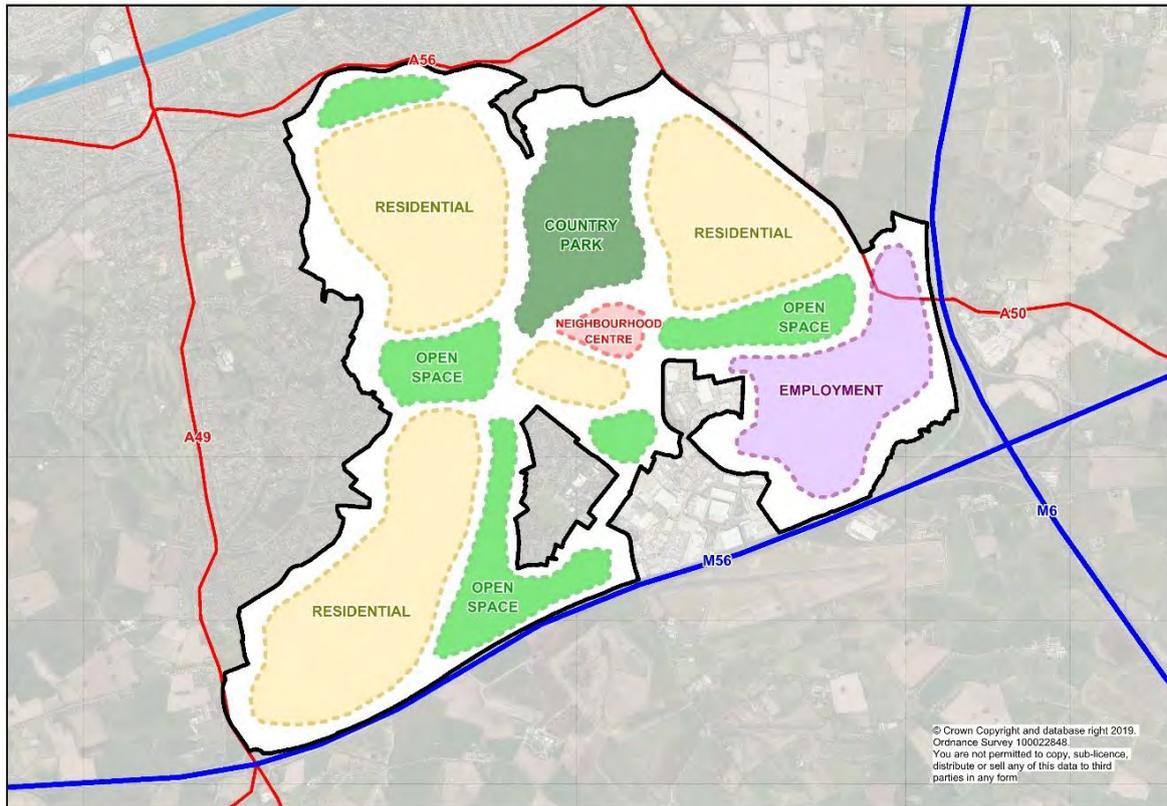
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**This document was prepared by Icen Projects on behalf of Wallace Land Investments**

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## Land at Cherry Lane, Lymm

Warrington Local Plan Review  
Proposed Submission Version: Regulation 19 Consultation  
Iceni Projects on behalf of Wallace Land Investments

**June 2019**

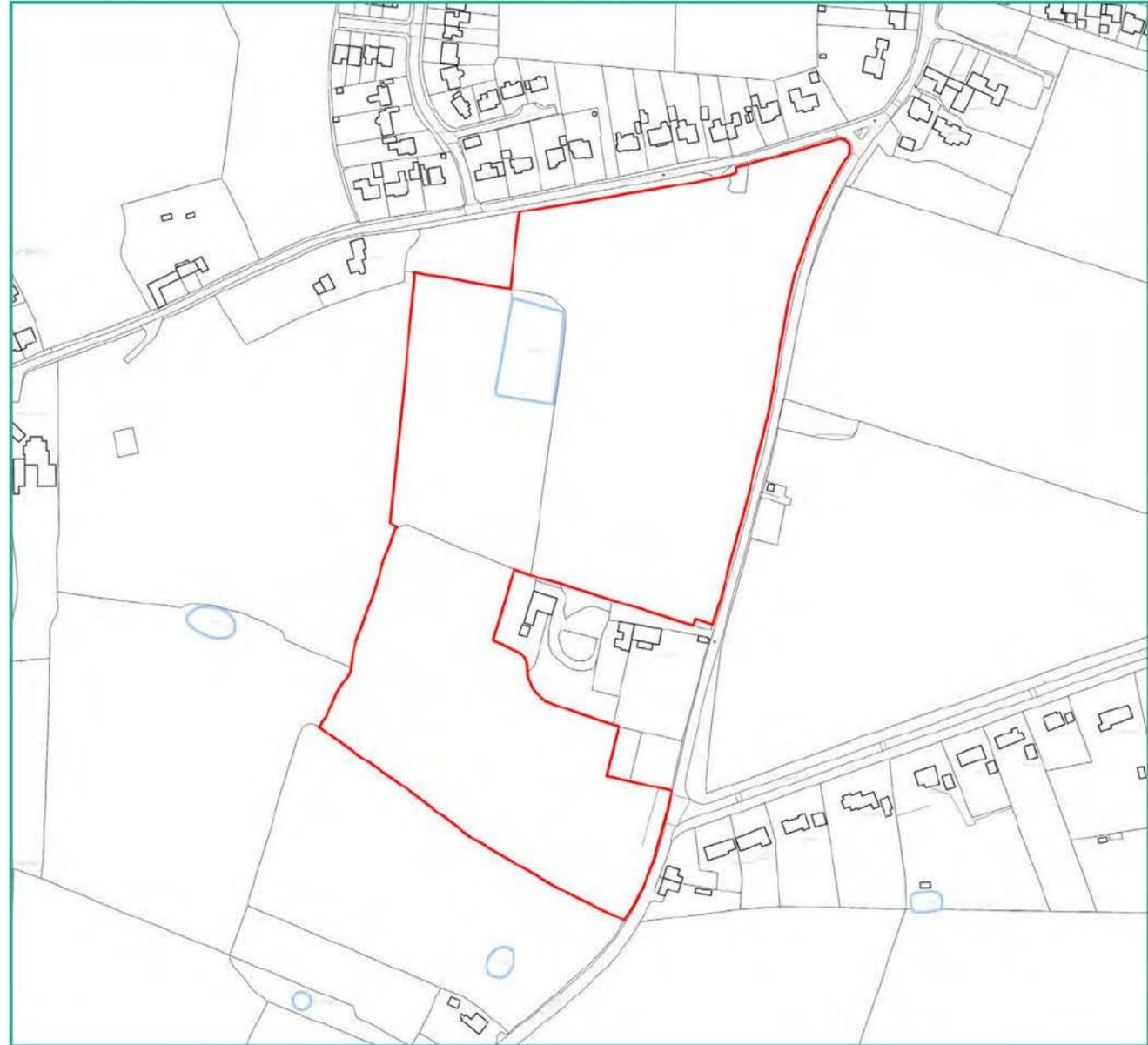


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- 6. Introduction
- 10. Development Vision for Cherry Lane
- 14. Comparing Land at Cherry Lane Against Proposed Allocations
- 24. Overall Conclusion



This document was prepared by IcenI Projects on behalf of Wallace Land Investments  
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Site boundary - 8.6ha / 21.2ac

Figure 1. Site Location Plan



Site boundary

Figure 2. Aerial Site Location Plan

## Introduction

1.0 Wallace controls a site off Cherry Lane, Lymm which extends to 8.6 ha (21.2 acres) of land. This site has been subject to a master planning exercise which confirms that it has the potential to provide a sustainable development accommodating the following:

- up to approximately 200 new homes (30% of which are to be affordable);
- informal and formal public open space with locally equipped areas of play, and
- the provision of serviced land for community use such as a new GP Surgery if required or playing fields for Cherry Tree Primary School.

1.2 Wallace prepared representations which were submitted at the Call for Sites (November 2015) Issues and Options (December 2016) and Preferred Development Options (PDO) (September 2017) stages. The representations were supported by a Vision Document demonstrating that the site presents a development opportunity to accommodate a proportion of the overall housing land requirements at Lymm on a sustainable and deliverable site, as part of the Council's development strategy for the its outlying villages.

1.3 Sufficient, suitable and sustainable land needs to be released for future development which meets the future housing requirements set in the Local Plan. As this scale of land release requires greenfield as well as brownfield land as part of the Council's development strategy then it is essential that any choice of greenfield land is based on its merits as sustainable development. If a greenfield site is in the Green Belt then another essential characteristic is the resultant physical nature of the revised Green Belt inner boundaries created.

### 2. NEED FOR GROWTH IN THE OUTLYING SETTLEMENTS

2.1 The Draft Local Plan defines the scale of housing requirements which the Council considers could be accommodated in each of the outlying settlements - a minimum of 1,085 homes. This is set out in Policy DEV1 – *Housing Delivery* which indicates in Policy DEV1 (4) that:

**A minimum of 1,085 homes will be delivered on allocated sites to be removed from the Green Belt adjacent to the following outlying settlements:**

- Burtonwood - minimum of 160 homes**
- Croft - minimum of 75 homes**
- Culcheth - minimum of 200 homes**
- Hollins Green - minimum of 90 homes**
- Lymm - minimum of 430 homes**
- Winwick - minimum of 130 homes**

### 3. LYMM'S POTENTIAL TO ACCOMMODATE FURTHER DEVELOPMENT

3.1 According to the Settlement Profile Document (July 2017) and the emerging Lymm Neighbourhood Plan (October 2018), Lymm has a current population of approximately 12,350 based on the existing 4,961 homes, with a younger demographic profile of 21% under 16, 60% aged 16-60 and 19% over 65 years.

3.2 The proposed allocation of a minimum of 430 new homes at Lymm, presented in the Draft Local Plan, is a reduction from 500 homes previously proposed in the PDO. The proposed settlement expansion is now less than 10% of its current settlement size. At the PDO stage, Wallace highlighted that an allocation of 500 homes was insufficient to address the need for further family and affordable housing in Lymm. Wallace recommended during that PDO consultation, that in order to improve the range and choice of sites, the Council should pursue growth in the order of 15% for Lymm – an allocation in total of around 750 homes.

3.3 Wallace has submitted General Representations to the Draft Local Plan about the need for 20% flexibility to its housing land requirement to ensure that its annual housing land requirement is maintained. This is in accord with the requirements set out in NPPF.

3.4 Because of its demographic profile of predominantly young families and professionals, the lack of availability of a range of type and size of housing continues to be an issue in Lymm. More housing needs to be built in Lymm in order to provide market and affordable homes.

3.5 Wallace has highlighted in its General Representations, that there are delivery issues due to lead-in times; infrastructure and remediation costs with a number of the brownfield sites in the Draft Local Plan's initial plan period (Years 0-5). This will inevitably lead to a delay in the delivery of effective housing land readily available for development at the adoption of the Local Plan. The reduction in the effective brownfield land supply means that more greenfield land within the outlying settlements is necessary to achieve the Council's growth aspirations. Accordingly, greenfield sites which can utilise existing infrastructure capacity and are immediately effective will deliver homes within the early years of the plan period.

3.6 Notwithstanding the concern about the sites currently allocated in the Draft Plan, Wallace maintains that additional sustainable, and effective housing land is required over and above that already identified in the Draft Local Plan. It should be noted that the 20% flexibility requires a further 1,890 homes to be allocated on sites in the Green Belt, given the capacity of the sites in the Urban Capacity is relatively fixed at 13,726 homes. In terms of the future release of sites in the Green Belt, it is proposed that up to 40% should be

allocated to the outlying settlements (750 homes) with the balance (1,140 homes) being delivered from further sites in the South Warrington Garden Suburb.

3.7 As Lymm is 41% of the Council's development strategy in the outlying villages, its housing target should be increased by 310 homes (41% of the proposed increase of 750 homes) to 740 homes in total. This means allocating a minimum of **740 homes for Lymm** as a consequence of **increasing the flexibility allowance from 10% to 20%**. It is recommended that, subject to specific site assessment, the settlement growth for Lymm is increased proportionately to a minimum of 740 homes.

### 4. SUSTAINABILITY OF THE SITE'S LOCATION IN LYMM

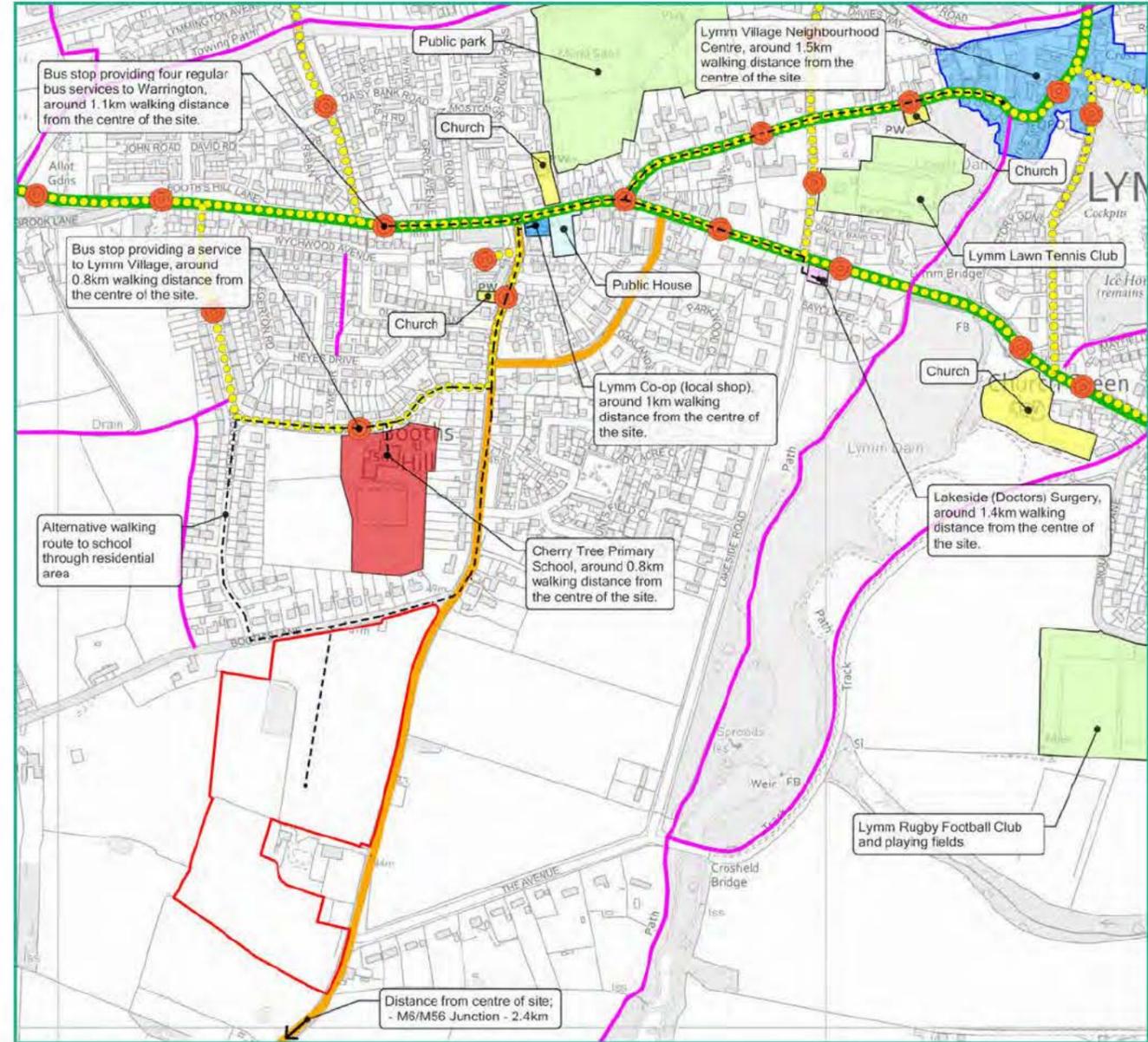
4.1 The strategic location of the Borough between the two city regions of Cheshire and Lancashire means the outlying villages of Warrington offer a highly desirable and attractive location to live. This is represented in Lymm where its average house prices are highest.

4.2 Lymm's market advantage is its proximity to the M6 Junction 20 and the M56 Junction 9. This accessibility makes Lymm an attractive destination. In addition, the A56 offers connections to nearby Altrincham to the west and Grappenhall to the east, and the A50 also provides connections south towards Knutsford and Manchester, and west into Warrington via Grappenhall.

4.3 Lymm has a well performing village centre with a good range of shops, restaurants, bars, and day to day amenities. Vacancy rates for these premises are accordingly low. Located within a short walk of the site is the local primary school (Cherry Tree Primary). The secondary school is located 3km to the north of the site. Lymm village neighbourhood centre is approximately 1.5 km walking distance from the centre of the site. A Post Office, local shop, hotel and public house are located within 600m from the centre of the site.

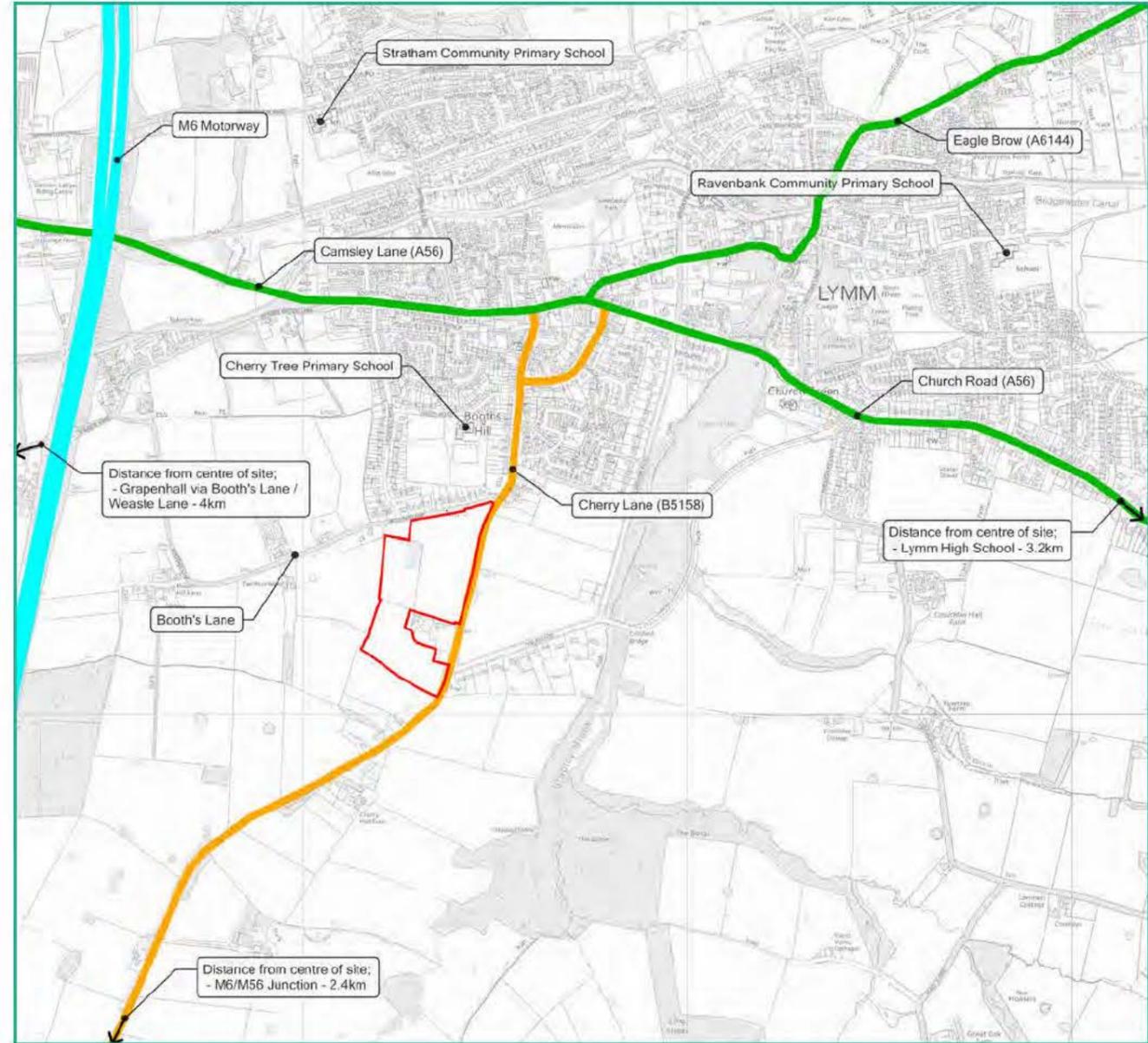
4.4 Bus services are available throughout the village on the B5158 and on the A56. The nearest bus stop is located within easy walking distance, approximately 500m from the centre of the site. A number of bus services already operate around the site, including hourly services to Warrington. As bus services are a demand led service, the potential increase of the population in this area, allows the opportunity for the bus service and bus stops to be improved and be amended to be closer to the site.

4.5 The site is the closest site to the proposed new employment area as part of the Garden Suburb and also has easy access to both Manchester and Liverpool via the motorway network. This is in contrast to the traffic from the proposed allocations which will have to pass through the centre of Lymm and past the Cherry Lane site to access the motorways.



- Site boundary
- Lymm Village Neighbourhood Centre
- Land use: School
- Land use: Retail
- Land use: Leisure (hotel, pub etc.)
- Land use: Place of Worship
- Land use: Health
- Land use: Outdoor sports facilities
- 'A' Road
- 'B' Road
- Public Right of Way
- Bus stop
- Bus route
- Walking distance from centre of site

Figure 3. Sustainable Location Plan



- Site boundary
- Motorway
- 'A' Road
- 'B' Road

Figure 4. Strategic Site Location Plan

## Development Vision for Cherry Lane

### 5. GREEN BELT ALLOCATION

5.1 Wallace is promoting a site at Cherry Lane as an allocation in the Local Plan. It is located to the south of the current built up area. The B5158 Cherry Lane and Booths Lane will provide a clear defensible boundary position to the north and east of the site. Existing field boundaries to the west can be strengthened to form a new inner Green Belt boundary.

5.2 The site was submitted via the Call for Sites in November 2015 and December 2016 (Reference **R18/008**). It was assessed in the 2015 and 2017 SHLAA as part of the ongoing process to identify the Borough’s ‘deliverable’ and ‘developable’ supply of housing land.

5.3 The land off Cherry Lane has been assessed within the 2017 and 2018 SHLAA’s as being ‘constrained’ due to its designation as Green Belt. The Green Belt Study (2016) distinguished Green Belt functionality into four categories:

- No contribution;
- Weak contribution;
- Moderate contribution; and
- Strong contribution.

5.4 The Study assessed the land off Cherry Lane and it is identified within Character Area 8 which is assessed as serving a strong contribution to Green Belt purposes. The Study then went on to assess the individual parcels within the defined character areas. Land off Cherry Lane is identified as reference LY26 and is assessed as providing an overall strong contribution to the function of the Green Belt.

5.5 LY26 is assessed as the following:

- No contribution: to check the unrestricted sprawl of large built-up areas
- No contribution: to prevent neighbouring towns merging into one another
- Strong contribution: to assist in safeguarding the countryside from encroachment
- No contribution: to preserve the setting and special character of historic towns
- Moderate contribution: to assist urban regeneration by encouraging the recycling of derelict and other urban land.
- Overall Contribution: Strong

5.6 The Green Belt Study Addendum (July 2017) assessed all sites that had been submitted as part of the 2016 Call for Sites consultation. Land off Cherry Lane is again assessed as performing a strong contribution to Green Belt purposes.

### 6. RSK LANDSCAPE ASSESSMENT AND CONCLUSIONS ABOUT CONTRIBUTION TO THE GREEN BELT

6.1 In 2017, RSK was commissioned by Wallace to review Arup’s analysis and categorisation of land off Cherry Lane. The full assessment by RSK was part of the submission to the Council during the PDO consultation in 2017. RSK provided a review of landscape and visual effects based on the broad principles established in best practice guidance.

6.2 The analysis considered the preliminary baseline conditions of the proposed development context but did not attempt to score the significance of potential effects. However, it does identify issues which can be successfully mitigated in the site’s master planning.

6.3 In line with Arup’s methodology, professional judgement was applied to categorise the overall level of contribution to the Green Belt for Land off Cherry Lane. The assessment undertaken by RSK identifies shortcomings in Arup’s analysis especially the durability of the site’s boundaries to the north and east and the potential limited openness of the site particularly to the south. In addition, although there is no development within the site, existing vegetation within the site and adjacent built form enclosing the site on three sides reduces the degree of openness.

6.4 In applying professional judgement, RSK determined that the site at Cherry Lane provides a **moderate contribution** to Purpose 3 rather than **strong contribution** reported by in the Green Belt Study. In light of this, RSK concludes that the overall classification should be amended so that Land off Cherry Lane is categorized as providing a **moderate contribution** to Green Belt purposes.

6.5 This conclusion categorises the site as part of the Green Belt in the same terms as all of the proposed allocations in Lymm for Massey Brook Lane, Rushgreen Road/Tanyards Farm and Pool Lane/Warrington Road.

### 7. ACCESS

7.1 Vehicular access to the site can be provided from Cherry Lane (B5158) to the east of the site and pedestrian and cycle access from Booths Lane to the north with an easily accessible network of paths and public rights of way.

### 8. AGRICULTURAL LAND CLASSIFICATION

8.1 The site comprises Grade 3, which is good to moderate quality agricultural land, as described in MAFF (1988) Agricultural Land Classification of England & Wales. This

compares with proposed allocations at Lymm (all comprise Grade 3), and favourably against Rushgreen Road/Tanyards Farm which has better quality farmland (Grade 2 very good).

### 9. DRAINAGE / FLOODING

9.1 Environment Agency flood mapping confirms that the site is in Flood Zone 1 and therefore is at low risk of flooding.

9.2 An appropriate flood risk assessment will be undertaken as part of a planning application. The proposal will incorporate SUDS measures to ensure that surface water from the proposal meets greenfield run-off requirements.

### 10. PROPOSAL

10.1 The site presents a sustainable development opportunity to accommodate up to approximately 200 new homes (up to 30% of which will be affordable), as well as serviced land for a community use if required, such as a new GP practice or playing fields for Cherry Tree Primary School. The Council has identified that it will be necessary to expand Cherry Tree Primary School in Lymm and create additional primary care capacity. As the proposed site is within close proximity to the school, Wallace welcomes discussions regarding the potential to incorporate playing fields for Cherry Tree Primary School onto part of the site. The area of land could also accommodate a local GP surgery if the proposed allocation at Rushgreen Road/Tanyards Farm is removed in favour of the site at Cherry Lane.

10.2 A range of 2, 3, 4 and 5-bedroom market houses and affordable housing will be provided. All homes will be accessible within a safe environment. The proposal is designed to integrate with the existing urban character of Lymm. A large area of open space adjacent to the existing village provides a setting to the existing church and historic core of the village. This ensures that the proposal forms a natural extension to the existing community.

10.3 Open space and play space provision is located throughout the proposal and will be in accord with Council requirements.

10.4 The movement hierarchy around the site will provide safe and convenient access for pedestrians and cyclists. It will also provide a safe alternative route to Cherry Tree Primary School. This is achieved through a combination of shared surface lanes and a remote path network. Existing public rights of way to the north of the site have been integrated into the proposal’s pedestrian routes, allowing ease of connection to the wider countryside.

10.5 Structure planting will be provided along the southern and western boundaries of the site, providing a new and defensible inner boundary for the Green Belt. The structure planting will provide visual screening and an attractive edge to the development.

10.6 The structure planting will incorporate rural paths around the edge of the proposal, with regular links into the proposal and easy access opportunities to the surrounding countryside. The structure planting around the site will also help promote biodiversity and form a key element in the establishment of new wildlife habitats and corridors in the area.

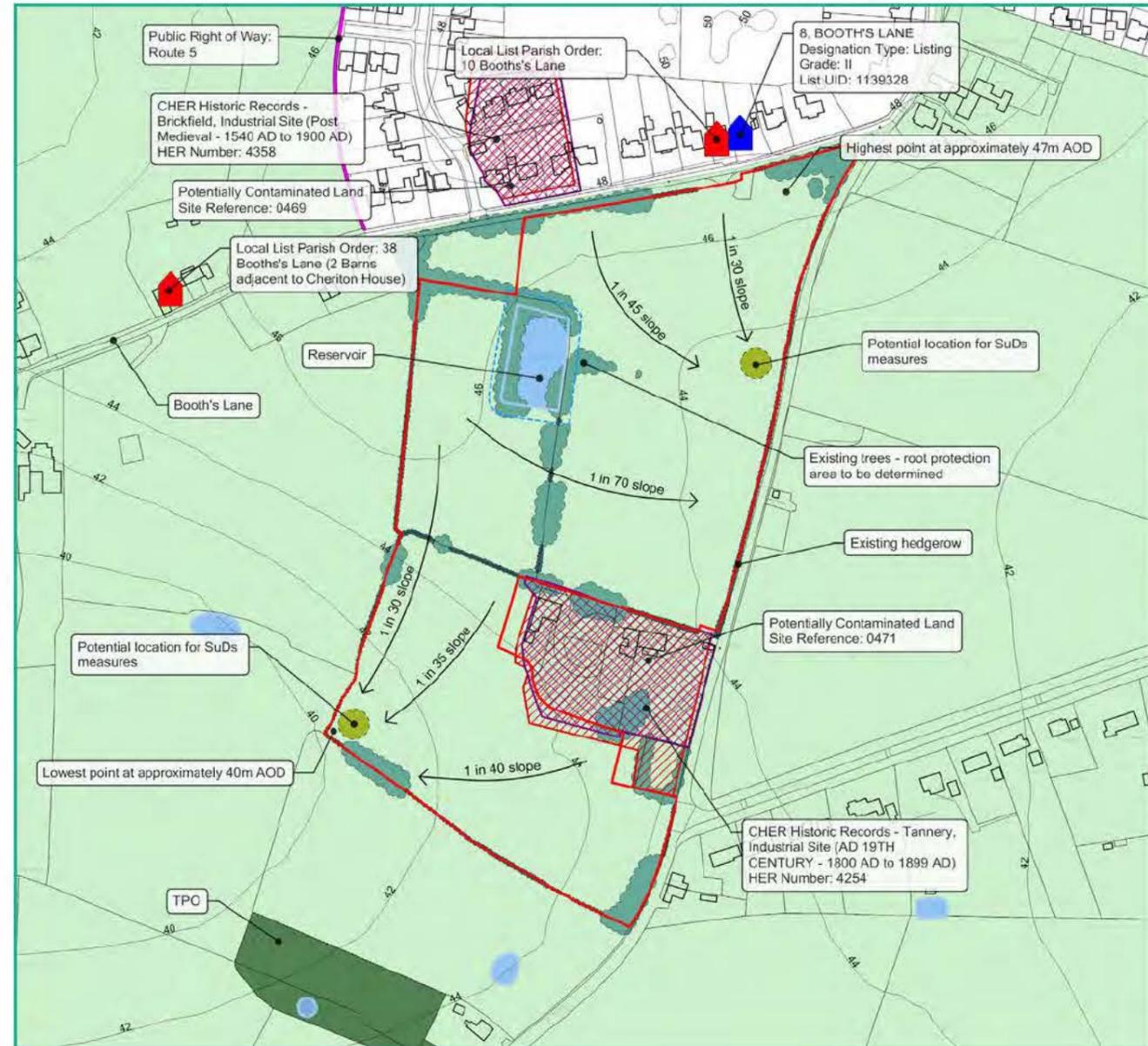
10.7 The proposal will maximise the future prospects of success in attracting new investment to Lymm and maintaining and enhancing existing services.

### 11. PHASING

11.1 The development trajectory set out in the Draft Local Plan identifies all the sites in the outlying settlements coming forward in Years 6-10 (2022-2027) with the majority of the completions in Council’s development strategy coming forward in 2023-2025 from brownfield completions. Wallace has provided evidence in their General Representations to the Draft Plan that there is a reliance on sites identified within the Town Centre and the Waterfront coming forward in years 1-5.

11.2 Wallace considers that some of the Town Centre sites are constrained by ownership, access and long lead-in times for construction. The Waterfront allocation is heavily constrained and requires significant infrastructure to allow sites to come forward at the start of the Plan period. Wallace maintains that there needs to be a controlled release of housing land in the outlying settlements and that the early release of Green Belt sites, will help to ensure that the supply of housing is spread more evenly throughout the Plan period and help to maintain a rolling 5-year effective housing supply.

11.3 The House Builders Federation (HBF) position is that when selecting housing sites for allocation, the Council should select the widest possible range of sites by both size and market locations to provide suitable land for small local, medium regional and large national housebuilding companies. Land at Cherry Lane provides a readily available and sustainable site that can be delivered within the first 5 years of the Plan period.



- Site boundary
- CHER Historic Records
- Potentially Contaminated Land (Warrington Borough Council Policies Map)
- Environment Agency existing waterbody 8m buffer
- Green Belt
- Tree Preservation Order (TPO)
- Existing waterbody
- Existing trees
- Existing hedgerows
- Public Right of Way
- Grade II Listed Building
- Locally Listed Buildings: Local List Parish Order
- Potential location for SuDS measures size and location to be determined by engineer
- ↘ Direction of slope
- Existing contours - 2m intervals

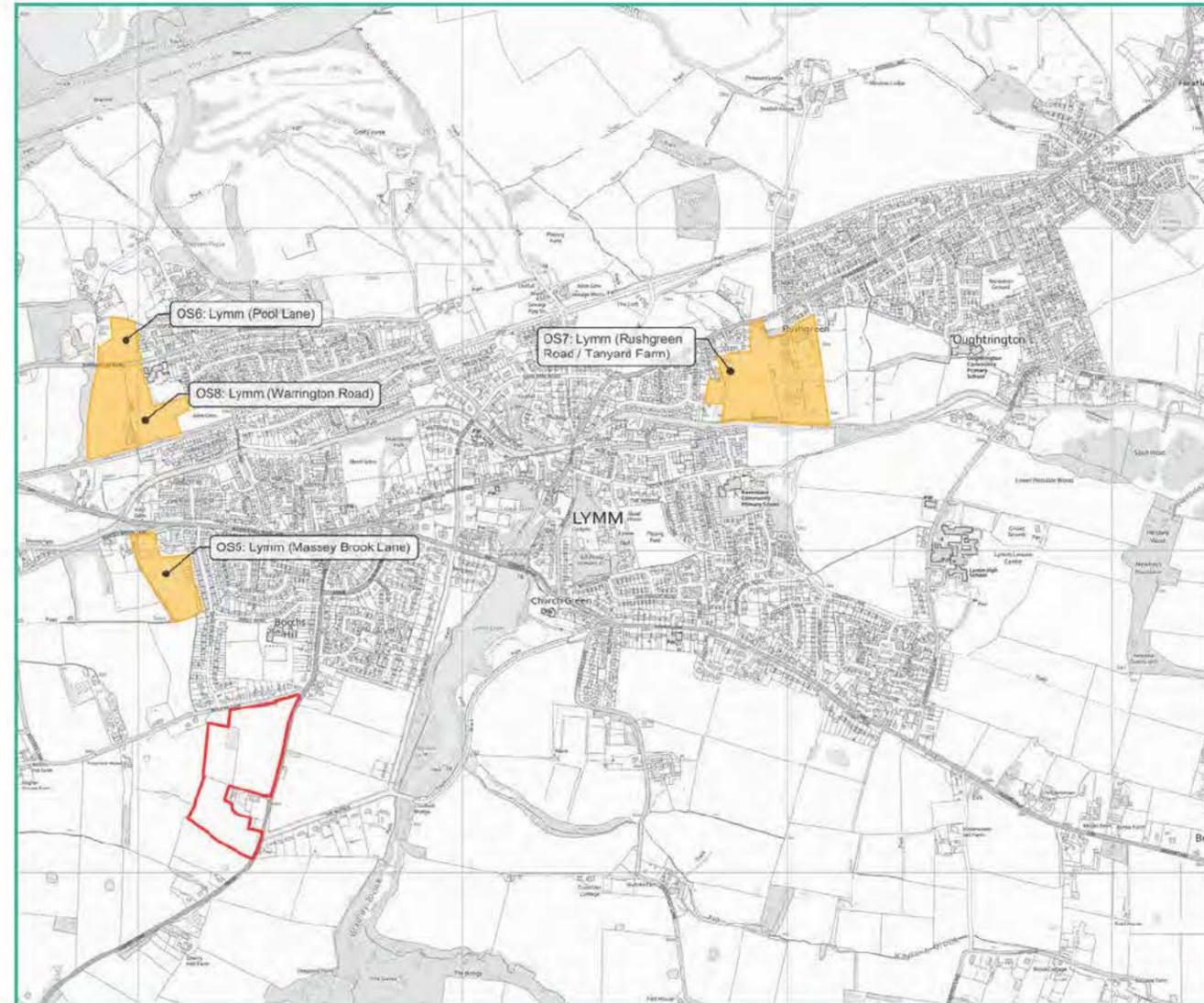
Figure 5. Site Opportunities & Constraints Plan



- Site boundary - 8.6ha / 21.2ac
- Potential developable area (5.69ha / 14.06ac)
- Frontage
- Potential open space provision
  - Amenity open space
  - Meadow grassland
- Indicative area for community use such as school playing fields or medical practice etc
- Potential location for SuDS measures
- Existing trees
- Potential tree planting
- Potential tree line
- Existing waterbody
- Existing watercourse
- Neighbourhood street
- Lane
- Path
- ↔ Potential pedestrian connection to primary school walking route
- Node
- Potential location of play area
- - -> Vehicular access

Figure 6. Indicative Development Framework

## Comparing Land at Cherry Lane Against Proposed Allocations



- Site boundary
- Site Allocation as identified in Warrington Proposed Submission Version Local Plan 2019

Figure 7. Proposed Allocations Plan | Lymm

### 12. PROPOSED SITE ALLOCATIONS

12.1 Warrington Borough Council is currently proposing four sites in the Draft Local Plan to meet the housing land requirement of a **minimum of 430 homes for Lymm**:

1. **Massey Brook Lane - 60 homes (Ref: OS5)**
2. **Rushgreen/Road/Tanyards Farm - 200 homes (64 consented) (Ref: OS7)**
3. **Pool Lane - 40 homes (Ref: OS6) and**
4. **Warrington Road - 130 homes (Ref: OS8)**

12.2 The Local Plan policies confirm that all allocated sites need to be able to provide a range of housing types and sizes, of which 30% is affordable, at a density of 30 dph. The Draft Local Plan is seeking a financial contribution to community facilities; open space provision; transport improvements and enhancement of natural resources.

12.3 Wallace is concerned that the Council's choice of sites in its development strategy for Lymm has failed to select the most sustainable locations. Accordingly, Wallace has further examined each of the proposed allocated sites for Lymm and compared the sustainability of each site compared with Wallace's site at Cherry Lane.

### 13. SUSTAINABILITY | SCORECARD ASSESSMENT

13.1 To provide a comparable sustainability assessment, Wallace has utilised the 'Sustainable Development Scorecard'; a tool developed by the Sustainable Development Commission chaired by former Planning Minister Nick Raynsford. The Scorecard provides a basis to assess development proposals with the 'golden thread of sustainable development' running through them, providing a quantitative assessment of sustainable development credentials, as defined by the National Planning Policy Framework.

13.2 The Scorecard is intrinsically based within the context of the NPPF and its three equal pillars of environmental, economic and social sustainability. The Scorecard results are broken down into two scores; an overall 'Sustainability Score' which assesses the total contribution from each of the three pillars, and a 'Parity Score' which determines how balanced the contribution is from each of the three pillars.

13.3 As the analysis is based on the site's location and specific development proposals, the assessment is bespoke to each development in question, setting the Scorecard apart from other sustainability certification schemes. Given the great importance that is attributed to existing policy, Green Belt consideration is not included within the Sustainable Development Scorecard.

13.4 When assessed, Land at Cherry Lane, Lymm was found to have a total **integrated sustainability score of 83%** and when broken down, its economic score was 80%, environmental 88% and social 82%. The parity score is 93% demonstrating an even balance between the three scores.

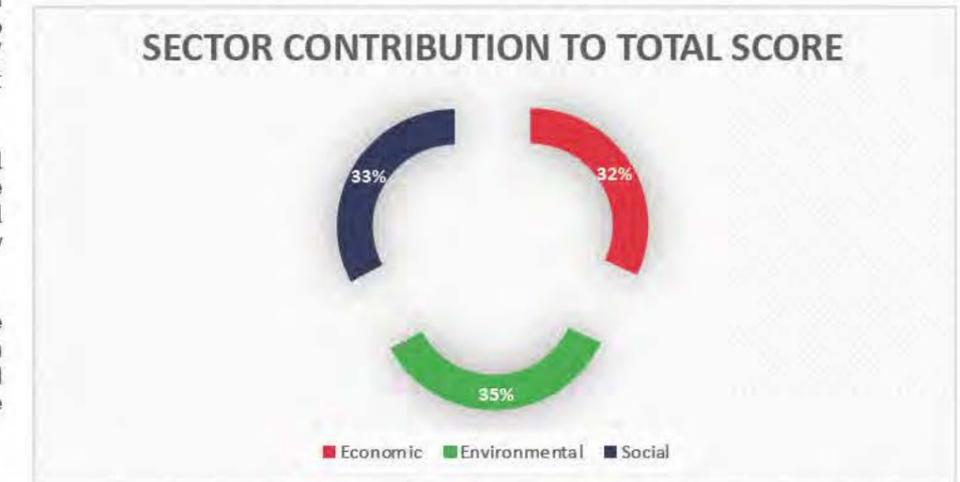


Figure 8. Sustainable Development Scorecard Results. Land Cherry Lane, Lymm

## Comparing Land at Cherry Lane Against Proposed Allocations

13.5 The score presented in this initial assessment is subject to change as it is based on initial development proposals but it is anticipated to increase as proposals are further refined.

### 14. SUSTAINABILITY ASSESSMENT OF WARRINGTON BOROUGH COUNCIL SUSTAINABILITY APPRAISAL (SA)

14.1 Icen have conducted a review of the Warrington Borough Council Sustainability Appraisal. The site being proposed by Wallace at Land at Cherry Lane, Lymm has not been assessed by the Council. Although this has been allocated reference numbers, based on the 2015 SHLAA, Call for Sites (2017) and Call for Sites (2018), no reference has been made to it in the Sustainability Appraisal. Accordingly, it has not been possible to appraise the site and compare its suitability and sustainability against the sites being allocated in the Draft Local Plan.

14.2 This oversight is unacceptable and Wallace requests that the site is fully assessed and that the Land at Cherry Lane, Lymm is included as part of the Council's Sustainability Appraisal. It is argued that its omission at present means that the site has been unfairly disadvantaged.

### 15. REVIEW OF POLICY OS5 - MASSEY BROOK LANE (60 HOMES)

15.1 Massey Brook Lane is situated to the west of Lymm and is allocated for 60 homes at a density of 30 dph. The following highlights issues associated with the proposed allocation of this site:

1. Sustainability of the Proposed Allocation
2. Strength of resultant Green belt Boundaries and
3. Effectiveness of the Allocated Site

15.2 These issues fundamentally impact on the underlying reasons for this site's allocation in the Proposed Local Plan.

#### Sustainability of Proposed Allocation

15.3 Using the Sustainability Scorecard, when assessed, the land at Massey Brook Lane, Lymm was found to have a **total integrated sustainability score of 75%** and when broken down, its economic score was only 67%, environmental 78% and social 80%. This compares to a total integrated sustainability score of **83%** for Cherry Lane.

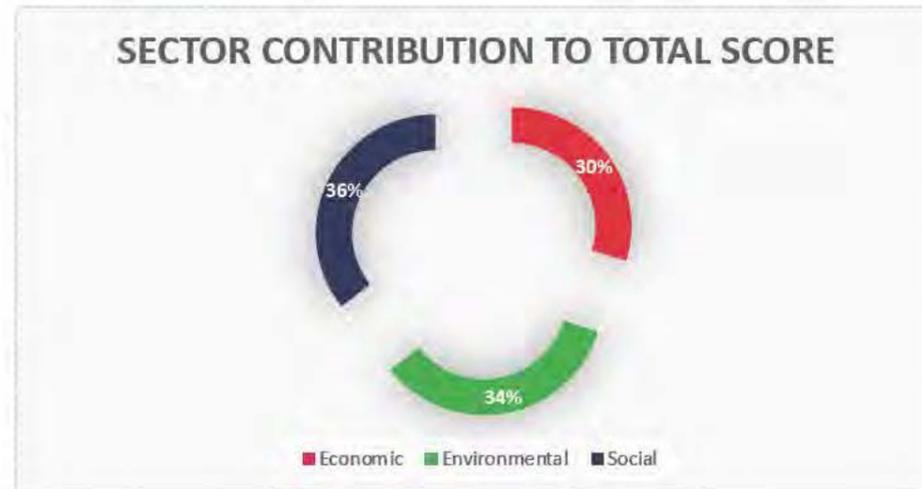


Figure 9. Sustainable Development Scorecard Results. Land Massey Brook Lane, Lymm

#### Strength of resultant Green belt Boundaries

15.4 The Draft Local Plan policy identifies that a landscape scheme will be required that retains and enhances trees and hedgerows along all of its boundaries, particularly the woodland along the western boundary for this allocated site.

15.5 The allocated site at Massey Brook Lane is within Parcel LY27 and is assessed as making a **"moderate contribution"** overall with a **Strong Contribution** under **Purpose 3 to safeguard the countryside from encroachment.**

**Reasoning:** "The parcel is connected to the settlement along its eastern boundary. This consists of hedge lined garden boundaries which are not durable and would not be able to prevent encroachment into the parcel. The parcel is well connected to the countryside along durable boundaries consisting of Massey Brook Lane and Booth's Lane. The existing land use mainly consists of open countryside and there is moderate vegetation mainly consisting of internal hedgerows. Built form consists of a garden centre and around eight residential properties in the south of the parcel, around the same number of properties in the north and a residential care home in the west, totalling less than 10% of the land area. The parcel helps to prevent further residential encroachment. The parcel supports long line views and overall supports a strong degree of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment."

15.6 Based on the reasoning set out above and a review of this proposal confirms that the resultant boundaries of the Green Belt remain weak and would allow further encroachment into the Green Belt especially to the south and west.

#### Effectiveness of the Allocated Site

15.7 As the Draft Policy highlights, the allocation of this site requires... **A package of transport improvements will be required to support the development.**

15.8 Given the surrounding road network, it is evident that a significant issue facing the immediate delivery of the site is its access. The Draft Local Plan indicates that access to the site will be via Massey Brook Lane. Massey Brook Lane is a narrow lane (at approximately 5m wide) and connects with the A56 at an acute angle with a considerable grade difference.

15.9 Given the level differences for this junction, this presents a real difficulty in pulling out into oncoming traffic. This also means that it is unlikely to be easily upgraded if a road capacity test were to determine that a suitable upgrade is required. Visibility to the left is obstructed

when a bus is waiting at the adjacent bus stop. As such, an intensification of the use of this junction with the existing layout would not be appropriate.

15.10 In addition, accessing this site will largely mean that additional traffic is pulled through the centre of Lymm travelling from east to west. This will exacerbate any local queuing of junctions in the centre of the town which is already extremely busy especially at peak times. This will exacerbate air with additional emissions in the town.

15.11 Wallace considers that it an appropriate package of transport measures may not be deliverable by this proposal if its access arrangements are not resolvable.

15.12 The supporting text states that site is relatively unconstrained and that it can be delivered in the early part of the Plan period. Wallace confirms that the site access is constrained and that major junction improvements will be necessary to allow safe access to the site. Evidence of such transport improvements will be required at Examination in Public in order to prove that the site at Massey Brook Lane is deliverable without harm to the safety of road users and that the site can be delivered early in the Plan process.

## 16 CONCLUSION

16.1 Whilst the policy states that the site performs well against the objectives of the Local Plan, the NPPF and the Local Plan Sustainability Appraisal, the evidence led by Wallace confirms that the alternative site at Cherry Lane is more sustainable (despite the site not being assessed in the Local Plan Sustainability Appraisal) using the Sustainability Scorecard.

16.2 The Cherry Lane site is not constrained in terms of access and can come forward for development immediately following the Local Plan adoption.

16.3 Given the evidence summarised above, Wallace concludes that the allocated site at Massey Brook Lane is not immediately available and consequently, is potentially non-effective as an allocation to come forward during first five years of the plan period given constraints associated with its access and its cumulative impact on traffic congestion and potential deterioration of air quality in the centre of Lymm.

16.4 Wallace recommends that the allocated site at Massey Brook Lane should be deleted.

## 17. REVIEW OF POLICY OS7. RUSHGREEN ROAD/TANYARDS FARM (200 HOMES)

17.1 The site is located to the north east of Lymm in the gap between Lymm and Rushgreen/

## Comparing Land at Cherry Lane Against Proposed Allocations

Outright. It is bounded by Rushgreen Road, Tanyards Farm and the Bridgewater Canal and has been allocated for a minimum of 200 new homes and a new health centre.

17.2 Planning permission for 64 new homes on part of the site at Tanyards Farm (2017/31816) was won on Appeal (5th September 2018 - APP/M0655/W/18/3200416). This leaves a balance of 136 new homes on this site together with the provision of a new health centre.

17.3 The following highlights issues associated with the proposed allocation of this site:

1. Sustainability of the Proposed Allocation, and
2. Adverse Impacts arising from the Site's allocation
3. Effectiveness of the Allocated Site

17.4 These issues fundamentally impact on the underlying reasons for this site's allocation in the Proposed Local Plan.

### Sustainability of Proposed Allocation

17.5 Using the Sustainability Scorecard, when assessed, the land at Rushgreen Road/Tanyards Farm, Lymm was found to have a **total integrated sustainability score of 75%** and when broken down, its economic score was 71%, environmental 75% and social 81%. The parity score is 90%. This compares to a total integrated score of **83%** for Cherry Lane

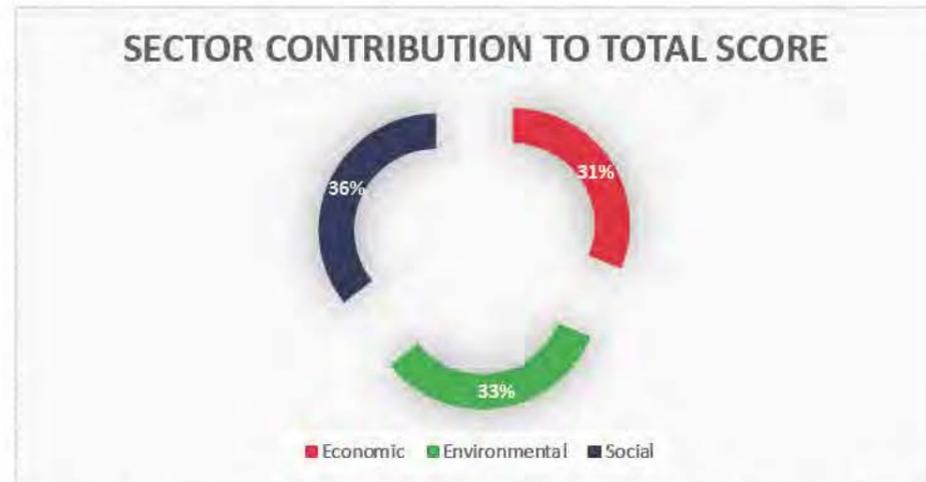


Figure 10. Sustainable Development Scorecard Results. Land at Rushgreen Road/Tanyards Farm, Lymm

### Adverse Impacts arising from the Site's allocation

17.6 The Heritage Impact Assessment (HIA) identifies that the site has a "moderate contribution" and harm to the setting of Grade II Listed Tanyards Farmhouse and that its ... **allocation for development may result in tall buildings in very close proximity to the asset adversely intruding within the setting of the asset via the gaps between properties (page 22).**

17.7 In terms of the Arup Green Belt Study (2016), the Rushgreen Road/Tanyards Farm allocated site performs a ... **strong contribution to safeguard the countryside from encroachment.** (page H7).

**The parcels well connected to the settlement on three sides along its northern, western and eastern boundaries. These predominantly consist of garden boundaries which would not be durable enough to prevent encroachment into the parcel. The parcel is connected to the countryside on one side. This consists of the Bridgewater Canal, which is durable enough to prevent encroachment beyond the parcel if the parcel was developed. The existing**

**land use mainly consists of open countryside with moderate vegetation. There is also a mix of greenhouses used for agriculture and warehouses, with hedgerows separating the parcel into several sections. There is one residential property in the south western corner of the parcel and another in the north. The parcel supports some long line views looking south and overall supports a strong to moderate degree of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment (page H7).**

17.8 Wallace is concerned that the issue of encroachment has not been properly considered for the whole of the allocated site at Rushgreen Road/Tanyards Farm. This issue was raised as part of the determination of the Appeal site, forming part of the allocated site.

17.9 It should be noted that the Inspector for the Appeal addressed this issue of encroachment. The Inspector concluded that the Appeal Site (part of the proposed allocated site) is situated on the settlement fringe and by reason of existing Previously Developed Land (PDL), there is already some encroachment and loss of openness. The Inspector concluded that part of the appeal site (the former nurse close to the Sainsbury's supermarket) is a discrete parcel of land.

17.10 In the determination of the appeal, concerns were raised by the local communities over the coalescence of Lymm with Oughtrington, currently separated by a significantly larger wedge of Green Belt. The Inspector concluded ... *I appreciate that local residents cherish the locally distinct identity of Oughtrington and Lymm, and I have considered carefully whether or not the proposed development [part of the allocated site] would result in a merging of these settlements.*

17.11 However, the decision to allow the appeal site stressed the need for the rest of the proposed allocation to be ... **permanently open, and a gap between Oughtrington and Lymm should be maintained (Inspectors Report 5th September 2018 - APP/M0655/W/18/3200416)**

17.12 The maintenance of this strategic gap as a wedge in the Green Belt is crucial to avoid the coalescence of the two settlements of Lymm and Oughtrington, as highlighted by the Inspector and the local Parish Councils.

17.13 If this is the future requirement for the development of this proposed allocated site then its overall capacity of 136 homes cannot be achieved on the site and its scale of development needs to be significantly reduced.

### Effectiveness of the Allocated Site

17.14 The Options and Site Technical Report also states that there are "suitability issues due to the eastern half of the site being potentially contaminated land, and the GP services in Lymm have no available capacity". The allocation of the site however requires a site for a new primary health care facility of a minimum of 1,500 sq.m. should be provided.

17.15 The Draft Policy highlights, the allocation of this site requires.. **The delivery of a new primary care health facility is therefore a key requirement of the development. The final size and nature of the facility will need to be confirmed with the Warrington Clinical Commissioning Group (CCG).**

17.16 The policy's supporting text states that site is relatively unconstrained and that it can be delivered in the early part of the Plan period. Wallace believes that the part of the site already granted permission on Appeal together with the requirement for a new Health Centre could be included as an allocation in the Local Plan. However, further evidence will be required at Examination in Public in order to prove that the remainder of the site at Rushgreen Road/Tanyards Farm site (or a smaller part of the site) can be delivered early in the Plan process.

17.17 In terms of access to the remainder of the site, any further housing would be served by a single access which was approved at Appeal, with the access junction sited closer to the existing Sainsbury's access than is ideal. Capacity testing would need to confirm if a simple T junction is a suitable form of access or a more substantial junction is required to accommodate the balance of the housing along with the Health Centre. The Draft Policy highlights, ... **Contributions towards infrastructure provision will be secured to ensure that Lymm's infrastructure/services can support the level of population growth. ...**

## 18. CONCLUSION

18.1 Clearly the part of the site close to Sainsbury's and forming part of the previously developed land of the former nursery has permission granted on Appeal. An extension to this solely to accommodate a new Health Centre could be considered for release from the Green Belt as already identified.

18.2 It is also evident that the Inspector considered the rest of the site stretching down to the Bridgewater Canal plays an important role in the physical separation of the settlements of Lymm and Oughtrington and should be retained in the Green Belt. It is now evident that only a much smaller part of the proposed site should be allocated for further development.

## Comparing Land at Cherry Lane Against Proposed Allocations

18.3 The results of the sustainability appraisal carried out to compare the proposed allocation with Cherry Lane, Lymm concluded that the site at Rushgreen Road/Tanyards Farm is less sustainable with an integrated score of **75%** compared to **83%** at Cherry Lane.

18.4 Given the evidence summarised above, Wallace concludes that the balance of the site should be retained in the Green Belt to maintain the physical separation of Lymm and Oughtrington, unless proven otherwise. Wallace submits that the balance of the allocation (circa 150 homes) can be met at the proposed site at Cherry Lane.

### 19. REVIEW OF POLICY OS6. POOL LANE (40 HOMES) & POLICY OS8. WARRINGTON ROAD (130 HOMES)

19.1 When considering the proposed allocations at Pool Lane and Warrington Road, their close proximity will have a cumulative impact if developed. Both sites are located to the north west of Lymm with Pool Lane being allocated for a minimum of 40 new homes and Warrington Road for a minimum of 130 new homes. Both sites are suggested to come forward quickly within the first 10 years of the Plan period.

19.2 Both sites are accessed off Warrington Road which is a minor road providing access to the west from housing to the north of Lymm onto Warrington via a connection to the A56.

19.3 The following highlights issues associated with the proposed allocation of this site:

1. Sustainability of the Proposed Allocation
2. Adverse Impacts arising from the Site's allocation
3. Effectiveness of the Allocated Site

19.4 These issues fundamentally impact on the underlying reasons for this site's allocation in the Proposed Local Plan.

#### Sustainability of Proposed Allocation

19.5 Using the Sustainability Scorecard, when assessed, the land at Pool Lane, Lymm was found to have a **total integrated sustainability score of 73%** and when broken down, its economic score was only 66%, environmental 75% and social 79%. The parity score is 87%. The site at Warrington Road, Lymm was found to have a **total integrated sustainability score of 74%** and with its economic score also only 66%, environmental 76% and social 79%. These compare to a total integrated score of **83%** for Cherry Lane

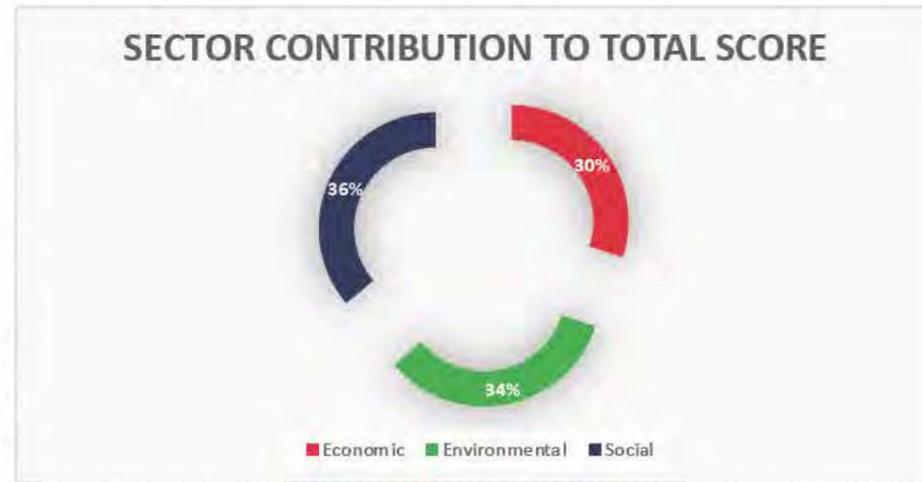
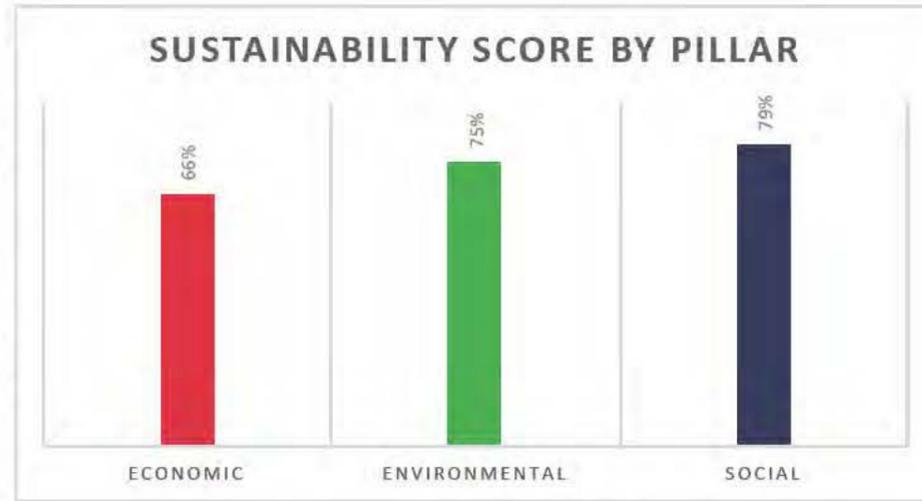


Figure 11. Sustainable Development Scorecard Results. Land at Pool Lane, Lymm

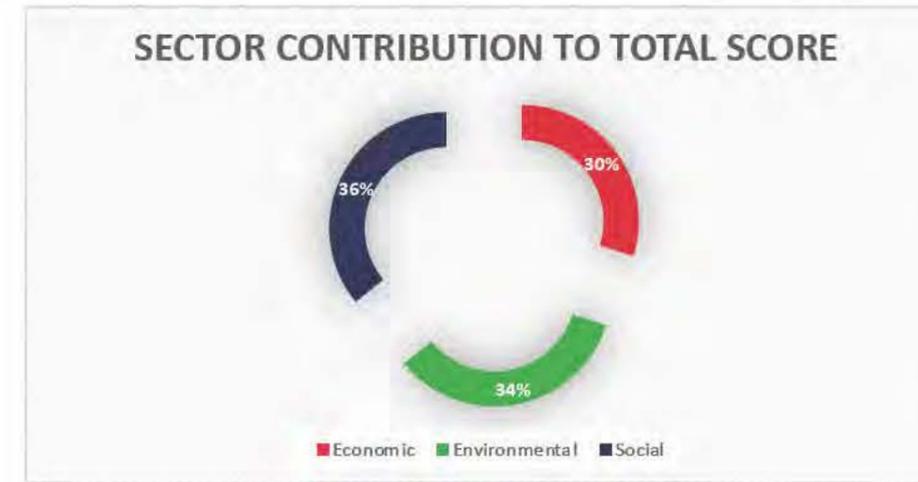
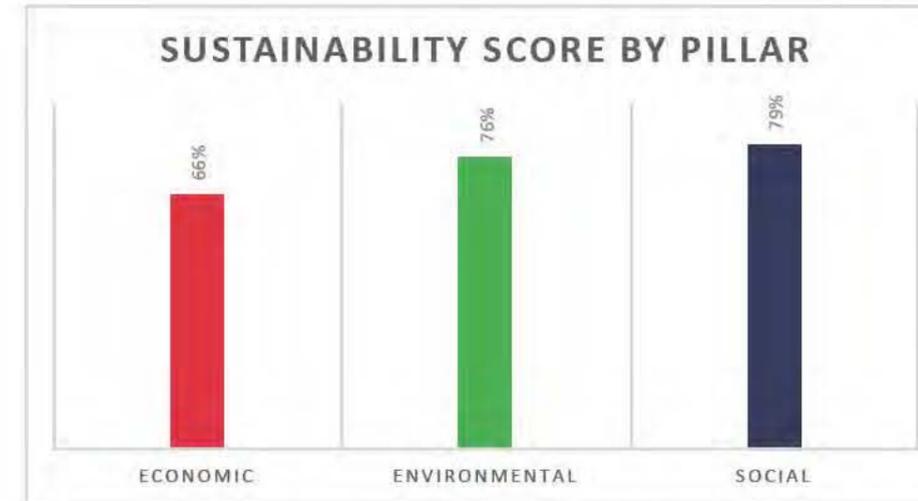


Figure 12. Sustainable Development Scorecard Results. Land at Warrington Road, Lymm

#### Adverse Impacts arising from the Site's allocation

19.6 Wallace considers that the cumulative traffic impact from the allocation of a minimum of 170 homes from this part of Lymm has been understated.

19.7 All traffic from these proposed allocations, not bound for Warrington, require to travel through the centre of Lymm to reach destinations to the east and south. This will increase peak hour traffic movements, lead to greater congestion and delays, with access to the centre of Lymm being via Star Lane/Barsbank Lane to the A56 or via Whitbarrow Road.

19.8 The traffic from these two proposed allocations also increase peak hour traffic movements in the vicinity of Statham Community Primary School, where on-street parking associated with the School is already known to be an issue.

19.9 In addition, the Local Plan Heritage Impact Assessment (HIA) identifies that the sites, and in particular Pool Lane, will also cause moderate harm to the Grade II Listed Statham Lodge unless mitigated with the outlined measures.

**Reasoning: "Allocation of the Pool Lane site for development may result in loss of rural setting of the asset. Its allocation for development may result in residential properties in close proximity to the asset adversely intruding within the setting of the asset via the 11 gaps in screening" Warrington Road's "allocation for development may result in residential properties in close proximity to the asset adversely intruding within the setting of the asset via the gaps in screening, resulting in slight harm to the significance of the asset."**

19.10 The HIA also identifies a slight impact upon the significance of the locally listed Pool Lane Cottages, Pool Farm and moderate impact on the significance of the locally listed Star Inn Public House. The emerging Lymm Neighbourhood Plan and Lymm Heritage and Character Assessment has highlighted the need to protect the heritage and character of Lymm from adverse development.

19.11 In respect of the assessment of Green Belt, the allocated site at Pool Lane lies within Parcel LY2 and is found to make a **"moderate contribution"** and Parcel LY3 which covers the Warrington Road site has elements identified as making a **"strong contribution"**. Overall, both sites make a strong contribution to safeguarding from encroachment into the countryside due to its openness and the weak boundaries between the parcels and the settlement.

## Comparing Land at Cherry Lane Against Proposed Allocations

19.12 The Options and Site Assessment Technical Report also show that there are “suitability issues as the sites are within Flood Zone 2” and “adjacent to an area of potentially contaminated land to the east”.

19.13 It is evident (and proven from a site visit) that the background noise levels from traffic on the M6 Motorway are high. Without demonstration that adequate mitigation can be provided, traffic noise will have an adverse effect on the amenity of any outdoor space within the proposed development, including gardens and play spaces.

19.14 All of the above issues confirm that the proposed allocation of these two sites promote adverse environmental and other impacts for which the mitigation is not yet known.

### Effectiveness of the Allocated Site

19.15 The Options and Site Technical Report states that there are suitability issues as Pool Lane is within Flood Zone 2, that the site is “adjacent to an area of potentially contaminated land to the east”, and that “GP services have no available capacity in Lymm.

19.16 The Draft Policy highlights, that there needs to be a comprehensive package of contributions made towards, education, primary care, open space and leisure facilities. The policy also states that the **design of the development must incorporate appropriate measures to mitigate noise impacts from the adjacent Statham Lodge Hotel**. The allocation of this site also requires... **A package of transport improvements ... to support the development**.

19.17 The policy supporting text states that site is relatively unconstrained and that it can be delivered in the early part of the Plan period. However, further evidence will be required at Examination in Public in order to prove that it is deliverable in the early years of the Plan.

## 20. SUMMARY

20.1 Given the evidence presented above, Wallace concludes that the Integrated Sustainability Score for Pool Lane of **73%** and Warrington Road at **74%** is lower than the **83%** achieved at Cherry Lane as demonstrated in the Sustainability Checklist.

20.2 The Council’s own evidence from its Green Belt Study is that the proposed allocations do not fully meet the requirements and necessary criteria to be released from Green Belt. In particular, the proposed allocation at Warrington Road is part of parcel LY3 and performs a **Strong Contribution** to the purposes of Green Belt as independently assessed in the Green Belt Study (2016).

20.3 There are identifiable constraints associated with both proposed allocated sites especially in terms of access and the resultant cumulative impact of traffic and pollution in the centre of Lymm.

20.4 Wallace concludes that the proposed allocation at Pool Lane for 40 homes should be removed from the Draft Local Plan due to its lack of sustainability and adverse impacts on its locality.

20.5 Wallace concludes that the proposed allocation at Warrington Road for 130 homes is in a sustainable location but, taking into account the proposal’s adverse effect on the Green Belt, then the proposed allocation should be reduced in size to minimise the impact on traffic on Lymm town centre.

## Overall Conclusion

### 21. CONCLUSION

- 21.1 Wallace agrees that greenfield sites in the Green Belt are required to meet the housing targets to achieve the growth aspirations of the Council’s development strategy.
- 21.2 Wallace considers that the amount of land allocated for development in Lymm should be increased if its agreed that the Local Plan needs to accommodate a 20% increase in flexibility rather than 10% as proposed. This results in an overall increase of 1,890 homes to be accommodated on Green Belt sites. It is proposed that the Council’s development strategy be modified with 40% of this increase allocated to the outlying settlements (750 homes) and South Warrington Garden Suburb accommodating the balance of 60% (1,140 homes).
- 21.3 It is proposed that the development strategy for the outlying villages requires to be modified proportionately with Lymm’s minimum requirement increasing from 430 homes (41% of the proposed scale of additional housing) to 740 homes. In the event that the proposed allocations remain the Plan, Wallace submits that there is a shortfall of approximately 310 homes to be met in Lymm. This is a proposed overall settlement increase of around 15% to meet existing housing need and demand.
- 21.4 Wallace has proved and substantiated using the Sustainable Development Scorecard that the Cherry Lane site is more sustainable, deliverable and more appropriate than the proposed allocations for Lymm, especially the two sites allocated at Pool Lane (40 homes) and Warrington Road (130 homes). This is confirmed in the following table where using all criteria Cherry lane has the highest scores:

Site	Integrated Sustainability Score (%)	Economic Sustainability Score (%)	Environmental Sustainability Score (%)	Social Sustainability Score (%)	Parity Score
Cherry Lane, Lymm (Wallace)	83	80	88	83	93
OS5. Massey Brook Lane, Lymm	75	67	78	80	87
OS7. Rushgreen Road/Tanyards Farm	75	71	75	81	90
OS8. Warrington Road, Lymm	74	66	76	79	87
OS6. Pool Lane, Lymm	73	66	75	79	87

- 21.5 The site at Cherry Lane, Lymm is clearly the most sustainable site compared to the proposed allocations across the rest of the settlement.
- 21.6 In addition, Wallace has commissioned a review by RSK of the Green Belt Study. This confirms that the site at Cherry Lane makes a **moderate contribution** to the 5 purposes of Green Belt, as set out in the NPPF. The site at Cherry Lane does not make a significantly greater contribution to the Green Belt than the other sites allocated in the Draft Local Plan.
- 21.7 The site can accommodate up to approximately 200 new homes of a range of type and size and up to 30% affordable housing.
- 21.8 The site is within easy walking distance of the centre and traffic can access the M6/M56 at the Lymm interchange and onwards towards Warrington to the west and Knutsford and the east via the A50. In contrast with the proposed allocations at Massey Brook Lane, Pool Lane, Warrington Road and Rushgreen Road/Tanyards Farm, the site at Cherry Lane provides alternative choice of routes through Lymm which will not create significantly more additional trips through the centre of the town, adding to traffic congestion and pollution.
- 21.9 It is expected that, due to the strategic location of Cherry Lane to the south of the village, nearest the motorway network, it will have the lowest traffic impact on Lymm town centre for the majority of trips compared to the proposed allocations.
- 21.10 The site is the closest site to the proposed new employment area as part of the Garden Suburb and also has easy access to both Manchester and Liverpool via the motorway network. This is in contrast to the traffic from the proposed allocations which will have to pass through the centre of Lymm and past the Cherry Lane site to access the motorways.
- 21.11 The site at Cherry Lane is the only proposal that could accommodate the need for playing fields for Cherry Tree Primary School in close proximity. The proposal of a community area within the development can include a serviced site for a new medical practice, should the allocation at Rushgreen/Tanyards Farm be deleted in favour of Cherry Lane.
- 21.12 The site at Cherry Lane is effective and can be delivered without any up-front infrastructure improvements.
- 21.13 The evidence provided by Wallace in its General Representations and in this representation, has demonstrated that there is a potential under delivery of completions from effective sites at the beginning of the Plan period. Wallace has shown that the site at

Cherry Lane can come forward in the initial years 0-5, making an immediate contribution to the Local Plan’s rolling 5-year effective housing land supply.

- 21.14 Wallace requests that the site is allocated on its sustainability merits to help meet the Council’s development strategy in its outlying settlements, addressing any shortfall in the housing requirements for Lymm which may arise for the allocated sites for the issues explained above.

### 22. RECOMMENDATION FOR MODIFICATION TO DRAFT LOCAL PLAN

- 22.1 Depending on the overall scale of growth to be accommodated in Lymm, Wallace recommends that Cherry Lane is allocated for 200 homes, informal and formal public open space with locally equipped area of play, and the provision of serviced land for community use such as a new GP Surgery (if required) or playing fields for Cherry Tree Primary School.
- 22.2 This proposed allocation can be either a sustainable addition to the housing land supply in the early part of the plan period if the scale of growth for Lymm is increased as proposed by Wallace to 740 homes, or as a sustainable replacement for the draft allocations in Lymm which in Wallace’s opinion should be removed or reduced in scale (with the exception of the part of Rushgreen Road/Tanyards Farm for 64 homes that was granted permission on Appeal) to deliver the Council’s proposed minimum of 430 homes in Lymm.

**This document was prepared by Icen Projects on behalf of Wallace Land Investments**

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## Land at Junction 10, M56, Stretton

Warrington Local Plan Review  
Proposed Submission Version: Regulation 19 Consultation  
Iceni Projects on behalf of Wallace Land Investments

**June 2019**



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- 4. Introduction
- 8. Development Vision
- 12. Next Steps



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Site boundary

Figure 1. Site Location Plan



Site boundary

Figure 2. Aerial Site Location Plan

## Introduction

1.0 Wallace Land Investments (Wallace) controls a 39.2 hectare (ha) site at Junction 10 of the M56, Stretton. It has expressed its intent to promote this land holding for development in previous representations to the emerging Local Plan. These representations include submissions at the Call for Sites (November 2015); Issues and Options (December 2016) and Preferred Options (September 2017) stages. These representations were supported by vision documents which demonstrated that the site presents a strategic development opportunity to accommodate a proportion of Warrington’s housing land requirements on a sustainable site.

1.1 For ease of reference, the land at Junction 10, M56, Stretton is referenced in the July 2017 SHLAA as **R18/88 Land adjacent to M56, Stretton** and in the 2018 SHLAA as **site number 2902**. The site is currently designated as Green Belt in the adopted Local Plan.

1.2 This site is now designated in the Draft Local Plan as part of South Warrington Garden Suburb which is to be delivered through the policy framework in Policy MD2. The site is part of Village A of the Garden Suburb which comprises land in the control of Wallace and land in the ownership of Homes England.

1.3 The land on the Wallace site is to be developed for housing set within a greenspace framework. It is anticipated that the site can accommodate around 800 homes based on the Council’s proposed density. Completions are expected from this site by 2023/24 and a start to construction will be required in 2022/23. The site provides the opportunity to deliver the part of the strategic link for the Garden Suburb from the A49 to the new Neighbourhood Centre. Other sites will complete this strategic road network.

1.4 The site also provides the opportunity to address existing local transport constraints at Stretton at the junction of Tarporley Road/Stretton Road/Hatton Lane as it effectively delivers a local by-pass. This eases congestion at this junction with considerable amenity and environmental benefits for the local community.

1.5 Notwithstanding the designation of the site as part of the Garden Suburb, this site meets the Council’s sustainability requirements; provides the only solution to relieving existing traffic capacity constraints by providing a local by-pass and it provides suitable long term Green Belt boundaries to the east and south of the site.

1.6 This site (unlike others within the Garden Suburb) does not have a dependency on other Garden Suburb sites for its delivery in terms of its access and services. The junctions into the site from the A49 and Stretton Road work equally well whether as a standalone proposal or for accommodating traffic from the Garden Suburb. Services for the housing on this site originate from the west at Stretton. The site is effective and can fund its

infrastructure requirements whether as an integral part of the Garden Suburb or as a standalone development.

1.7 For the reasons explained in this Representation, the site known as Land at Junction 10, Stretton can continue to be considered as an integral part of the Garden Suburb but it has the requirements in physical and infrastructure terms to be considered as a separate effective and viable housing allocation if need be.

### 2. STRATEGIC CONTEXT

2.1 Warrington has a strong economic reputation and is one of the top centres of employment in the North West of England. A contributing factor to its success has been due to its well-connected infrastructure network, in particular its proximity to the M62, M6, and M56 motorways. Both the West Coast Mainline and the Trans Pennine Rail lines run through the town.

2.2 As highlighted by the supporting diagrams in this document, Warrington and Stretton are well connected by road and rail. These locational advantages allow easy access to Warrington, the national transport infrastructure and the surrounding urban regions of Manchester, Chester and Liverpool.

2.3 The site is located near a number of local amenities within Stretton and South Warrington. It also has the benefit of easy access to Stockton Heath which is the nearby core area for social and retail amenities.

2.4 There are two main business / commercial hubs along the M56 at the adjacent motorway junctions. Appleton & Stretton Trading Estates is located 2 miles east of the site and Daresbury Business Park is located around 3 miles to the west.

2.5 Although having motorway access, Daresbury Business Park and Appleton & Stretton Trading Estates lack integration with local settlements and consequently rely heavily on the car as their primary mode for accessibility.

2.6 The site forms part of the allocation of the South Warrington Garden Suburb as a consequence of its strategic context and ease of access to the motorway network. This is confirmed in its vision as a sustainable proposal, resolving and contributing to the overall infrastructure requirements of the South Warrington Garden Suburb. The site forms part of Village A, as explained in the Draft Local Plan’s Policy MD2. It provides the opportunity to build around 800 new homes, utilising existing local amenities with direct access to public transport. The site will provide an upgraded access onto the A49 and

onto Junction 10 and accommodate the strategic road link through to other parts of the Garden Suburb. It provides additional capacity for the local road network by relieving the capacity constraints at the Cat and Lion junction between Stretton Road and the A49. It has access to an existing network of public rights of way which will allow connections to the wider countryside. The site delivers long term Green Belt boundaries on its eastern and southern boundaries with its proposals for structure landscaping.

### 3. SITE CONTEXT

3.1 This site is bounded to the south by the M56 Motorway, adjacent to Junction 10. Open agricultural land lies to the east of the site. Tarporley / London Road (A49) runs along the western boundary. Stretton Road and Park Royal Hotel are located to the northern boundary.

### 4. GREEN BELT ALLOCATION

4.1 The site is currently located within Warrington Green Belt, which was first established in 2006.

4.2 The M56 and A49 will provide a clear defensible boundary positioned to the south of the site. Proposals to augment the existing field boundaries with substantial structure planting are planned for the eastern boundaries.

4.3 In its first stage, the Green Belt Assessment (October 2016) distinguished Warrington’s Green Belt into 24 overarching character areas. Land at Junction 10, M56, Stretton was identified within Character Area 10 and assessed as serving a Weak contribution to Green Belt purposes. Wallace agrees with this conclusion.

4.4 The Green Belt Report addendum (July 2017) assessed all sites that had been submitted as part of the 2016 call for sites consultation. Land at Junction 10, M56, Stretton was split into two site references R18/088 East and R18/088 West.

#### **R18/088 West was assessed as the following:**

- No contribution: to check the unrestricted sprawl of large built-up areas
- No contribution: to prevent neighbouring towns merging into one another
- Moderate Contribution: to assist in safeguarding the countryside from encroachment
- No Contribution: to preserve the setting and special character of historic towns
- Moderate contribution: to assist urban regeneration by encouraging the recycling of derelict and other urban land
- Overall Assessment: Weak Contribution

## Introduction

### R18/088 East was assessed as the following:

- No contribution: to check the unrestricted sprawl of large built-up areas
- No contribution: to prevent neighbouring towns merging into one another
- Strong Contribution: to assist in safeguarding the countryside from encroachment
- No Contribution: to preserve the setting and special character of historic towns
- Moderate contribution: to assist urban regeneration by encouraging the recycling of derelict and other urban land. Overall Assessment: Moderate Contribution

4.5 In the Regulation 18 Consultation, Wallace stated that the site needs to be considered in its entirety and that assessment would conclude that R18/088 East serves an overall weak contribution to Green Belt purposes.

4.6 In responding to this Regulation 19 Consultation, Wallace notes that Land at Junction 10 is listed in the 2018 SHLAA, identifying it as ‘constrained’. The site is not constrained once released from the Green Belt. The concluding comments in the SHLAA note that... “sites within the Green Belt, unless in compliance with the provisions of appropriate development as defined by the NPPF, are considered unsuitable due to policy constraints. In such circumstances, it is premature for the SHLAA to endorse specific sites in the Green Belt as suitable for residential development in advance of any comprehensive review of Warrington’s Green Belt to evaluate whether there are appropriate locations for future development.”

### 5. LAND USE

5.1 The site comprises mainly of Grade 3, with some Grade 2, agricultural land to the north west of the site (8.5%). This land is good to moderate quality agricultural land, as described in MAFF (1988) *Agricultural Land Classification of England & Wales*.

### 6. ACCESS

6.1 Vehicular access to the site can be provided from Tarporley Road (A49) to the west and from Stretton Road (B5356) to the north. These possible access connections can be linked through the site and effectively form a local by-pass for the local road network through Stretton.

6.2 The provision of a local by-pass will bring much needed relief to the Tarporley Road/Stretton Road/Hatton Lane junction.

6.3 Additional capacity in the local road network will be released with the early completion of this link road. It will also facilitate the downgrade of Stretton Road through the

village, along with amenity and environmental benefits to the local community.

6.4 Pedestrian and cycle access can also be provided to Stretton Road with an easily accessible network of paths and public rights of way.

### 7. TOPOGRAPHY

7.1 The site is relatively flat and generally slopes from west to east. The highest point of the site is around 86m AOD. The lowest point of the site is around 76m AOD. The site is visible from part of the Motorway (M56).

### 8. DRAINAGE / FLOODING

8.1 Environment Agency flood mapping confirms that the site is not at risk of fluvial flooding. The proposal will incorporate SUDS measures to ensure that surface water from the proposal continues to meet greenfield run-off requirements.

### 9. MICROCLIMATE

9.1 The site is generally south / south east facing. The majority of the site is currently open to views from the south and east. An area to the south west is sheltered by a landscaped bund at Junction 10. The southern boundary of the site is situated within a 50m Motorway Buffer Zone as shown opposite. A Noise Assessment has been carried out, which determines that an acoustic barrier next to the motorway is required to deliver appropriate residential amenity within the site. Acoustic mitigation measures will be incorporated within the proposal.

9.2 Monitoring of air quality is to be undertaken to ensure that air quality standards can be met. All development proposed on the site will be outside the air quality management area (AQMA) detailed in the Council’s Local Plan Air Quality Modelling Report.

### 10. CULTURAL HERITAGE

10.1 There are no listed buildings or scheduled monuments within the site. The site is not within a conservation area. Located north of the site is a Grade II listed building (St Matthews Church). Spark Hall Close (Roman Road) runs adjacent to the site. Future proposals can adequately address the impact via a Heritage Impact Assessment that will identify any heritage assets within the setting of the site that may be affected and balancing against public benefits where required.

### 11. ECOLOGY

11.1 The site is not part of an ecological designation. Part of the site is located within a Site of Special Scientific Interest (SSSI) Impact Risk Zone. The nearest SSSI is located 6km to the west of the site. The site is also within a Nitrate Vulnerable Zone and is part of the Mersey Forest (Community Forest). The proposal will have no adverse impact to any of these designations.

11.2 There are a number of Tree Protections Orders (TPO) located adjacent to the site.

11.3 The site predominantly comprises fields used for winter and summer crops bound by species-poor hedgerows, interspersed with mature broadleaf trees. Other habitats present include improved and poor semi improved grassland with small scrubby woodland copses with poor-quality ponds. Provisional results of wintering and breeding bird surveys recorded eight farmland bird species of Conservation Concern (amongst others). Mitigation measures for the site will include the provision of open space to retain value for some of these species (i.e. lapwing, skylark), and the introduction of opportunities for new nesting for others (i.e. starling, house sparrow).

11.4 Great Crested Newt (GCN) Surveys were carried out in spring 2019 on two onsite ponds and one off site pond, with no GCN being recorded. Three offsite ponds located within 250m of the site have been tested for GCN using eDNA analysis and all were negative. The GCN is not, therefore, considered to pose a constraint to future development on-site. Wallace intends to retain most of the ponds on-site and the introduction of SUDS features, can be enhanced for amphibians and a wide range of fauna.

11.5 A badger survey carried out in 2019 found a main and outlier badger setts on site. Further assessments for badgers is required to determine extent of populations. Depending on the final proposal, replacement and then closure of these setts may be required.

11.6 Surveys still to be carried out on site include additional wintering bird surveys, October – December, bat activity surveys throughout the season (April – September), roost assessments and nocturnal surveys for bats in trees and buildings on site and water vole and otter surveys to be carried out on any suitable water features within the site.

11.7 The proposal maintains ‘green’ corridors through the site. This will mitigate impacts on foraging/commuting bats, and can be bolstered by additional specific features, subject to the results of the programmed bat surveys. The proposals also provide

opportunity to introduce bat roost features in new residences to provide biodiversity enhancements.

11.8 Overall, the proposal will not adversely impact on the site’s biodiversity through the introduction of a series of mitigation measures.

### 12. SUSTAINABILITY OF LOCATION

12.1 Located directly opposite the site is the local primary school (Stretton St Matthews). The secondary school is located 3km to the north of the site.

12.2 A Post Office, local shop, hotel and public house are located within 600m from the centre of the site.

12.3 Bus services are available on the boundaries of the site along the A49 and Stretton Road (B5356). The nearest bus stop is located within easy walking distance, approximately 500m from the centre of the site. These bus services include hourly services to Stockton Heath and on to Warrington.

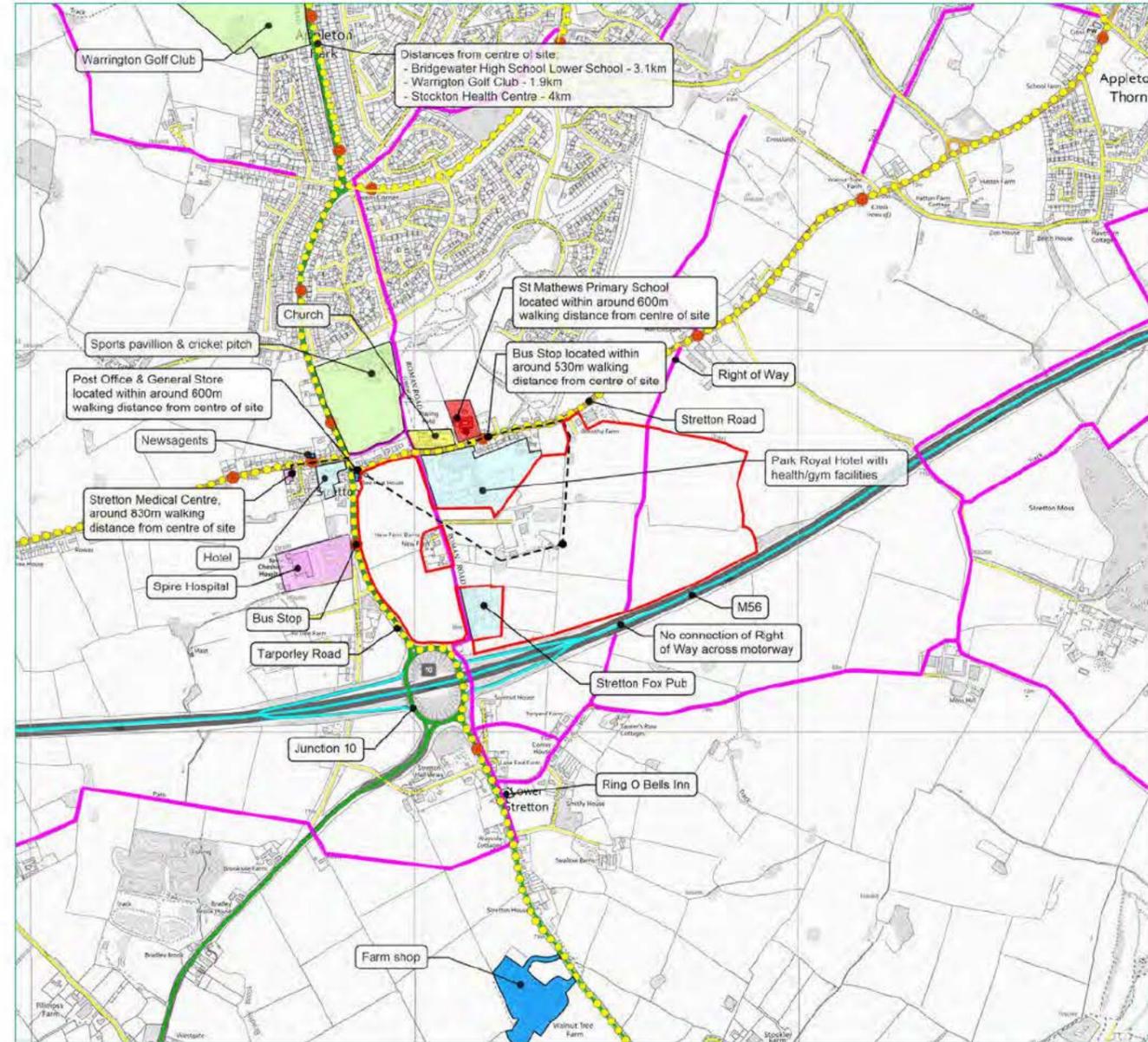


Figure 3. Strategic Site Location Plan

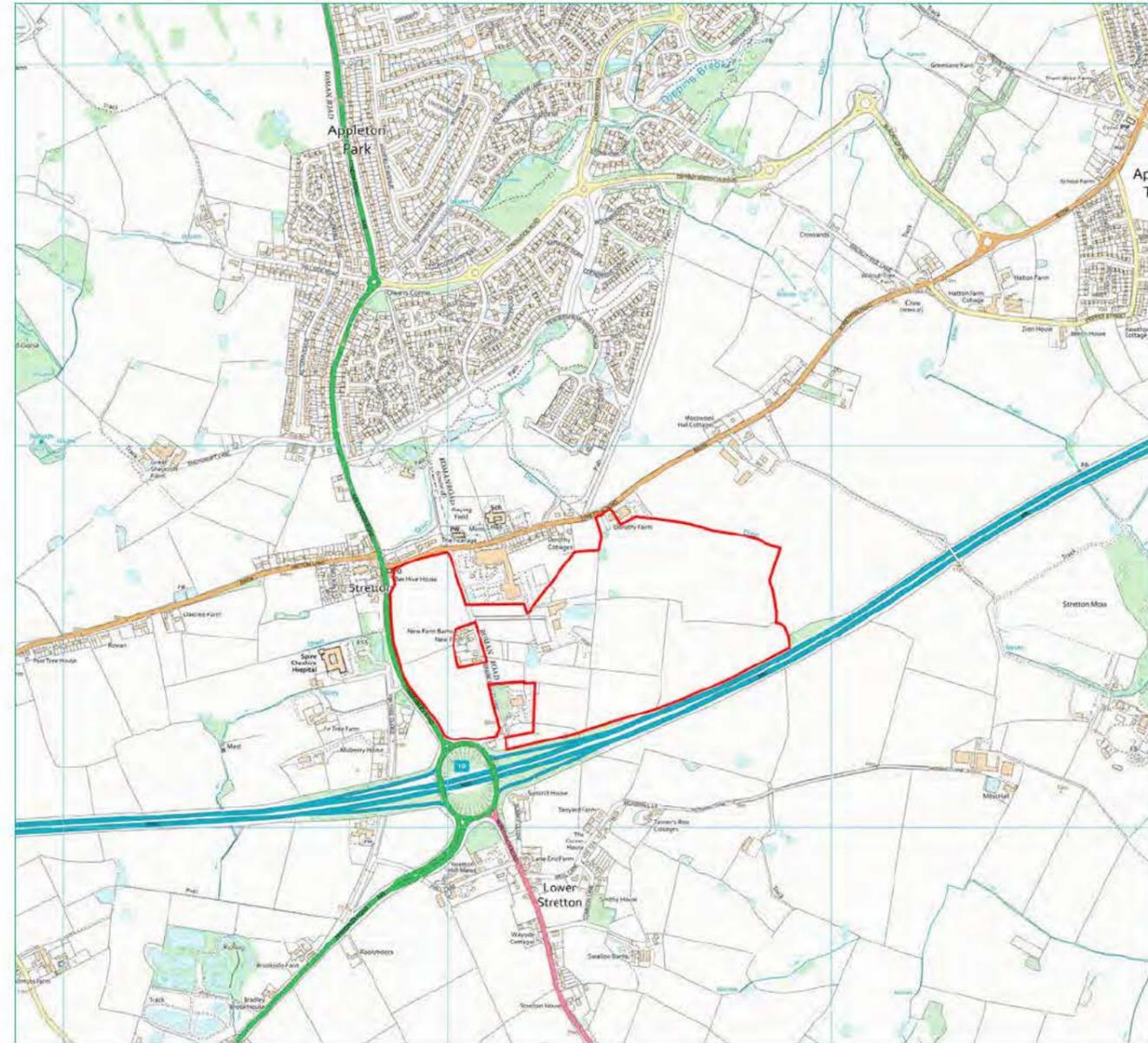


Figure 4. Site Location Plan

## Development Vision

### 13. COLLABORATION WITH THE COUNCIL

- 13.1 Throughout the evolution of the framework options for the Garden Suburb, Wallace has attended discussions held by the Council, along with other landowners and developers with interests in the Garden Suburb.
- 13.2 Wallace is supportive of the Council’s approach to collaborating with landowners and developers as well as local residents regarding the future development of the Garden Suburb.
- 13.3 The Council has now confirmed that it will proceed with the preparation of the Supplementary Planning Document to guide future proposals for the Garden Suburb’s three villages, Neighbourhood Centre, Employment Area and the Country Park. This will address the requirements highlighted in Draft Local Plan Policy MD2 - *Warrington Garden Suburb*.
- 13.4 These requirements will include the following:
- Development Framework for Warrington Garden Suburb;
  - Masterplans for each of the three Garden Villages;
  - Masterplan for the Neighbourhood Centre;
  - Masterplan for the Strategic Employment Area;
  - Masterplan for the greenspace infrastructure including the Country Park;
  - Locations and proposals for the infrastructure listed in paragraph 5 of Policy MD2.1 *Key Land Use and Infrastructure Requirements and Policy MDA 2.3 Detailed Site-specific Requirements*;
  - Details of the funding mechanisms and phasing for these Infrastructure Requirements as set out in Policy MDA 2.2 *Delivery and Phasing*;
  - Details of the routes for the strategic movement corridor (set within the land controlled by the working group), its technical specification, and the funding mechanism to deliver its phased delivery;
  - Outline technical specifications for the delivery of common infrastructure and specific infrastructure requirements for the Garden Suburb; and
  - Phasing plan and programme for the infrastructure and development proposals referred to in Policy MD2.
- 13.5 As part of this process, the Supplementary Planning Document (SPD) will define the funding mechanisms along with technical specifications to deliver a consistent set of infrastructure requirements along with their phasing, as set out in Policy MD 2.

- 13.6 At this stage, a working group of the Council and Warrington & Co with the land owners/ developers/house builders has been formed to collaborate and deliver the SPD. The key objective is to work collaboratively, both with each member of the working group, and also with the Council as Planning Authority, with the objectives of delivering the SPD and along with it, demonstrating the viability and effectiveness of the ongoing delivery of the South Warrington Garden Suburb.

### 14. DEVELOPMENT PROPOSALS

- 14.1 As part of this, Land at Junction 10, M56, Stretton presents a strategic development opportunity to accommodate between around 800 homes (subject to further master planning). Up to 30% will be affordable homes, in line with affordable housing proposals in Draft Local Plan Policy MD2 - *Warrington Garden Suburb*.
- 14.2 Vehicular access to the site will be provided from Tarporley Road (A49) to the west and from Stretton Road (B5356) to the north. The provision of a distributor road through the site utilising these access points, will improve the local highway network by providing the strategic route to the M56 (Junction 10). This is essential since the Council’s traffic modelling indicates that around 36% of the traffic generated from the Garden Suburb will have a destination outside of the wider Warrington area.
- 14.3 Furthermore, this through road will be much needed relief to the Tarporley Road/Stretton Road/ Hatton Lane junction bringing environmental and amenity benefits for the local community.
- 14.4 Public transport services will also access this local by-pass. This by-pass acts both as a part of the route for the Garden Suburb’s strategic link and provides traffic relief with enhanced amenity for existing residents within Stretton. All of the benefits are realised when this local by-pass is delivered, whether or not, the proposal is developed as part of the Garden Suburb
- 14.5 The route of this road will have a series of residential areas along it and will pass through tree belts and open spaces, helping to create interest and character along the route.
- 14.6 Homes will include 2, 3, 4 and 5 bedroom market houses and affordable housing. All homes will be accessible within a safe environment. The proposal is designed to integrate with the existing village of Stretton. A large area of open space adjacent to the existing village provides a setting to the existing church and historic core of the village. This ensures that the proposal forms a natural extension to the existing community.

- 14.7 Open space and play space provision is located throughout the proposal and will be in accord with Council’s requirements.
- 14.8 The movement hierarchy around the site will provide safe and convenient access for pedestrians and cyclists. This is achieved through a combination of shared surface lanes and a remote path network.
- 14.9 Existing public rights of way have been integrated into the proposal, allowing ease of connection to the wider countryside.
- 14.10 Structure planting will be provided along the southern and western boundaries of the site, providing a new and long term defensible inner boundary for the Green Belt. The structure planting will provide visual screening and acoustic mitigation from traffic noise on the motorway as well as an attractive edge to the development.
- 14.11 The structure planting will incorporate rural paths around the edge of the proposal, with links into the proposal and easy access opportunities to the surrounding countryside. The structure planting around the site will also help promote biodiversity and form a key element in the establishment of new wildlife habitats and corridors in the area.

### 15. SUSTAINABILITY | SCORECARD ASSESSMENT

- 15.1 As part of the background work to inform Wallace’s plans for development at Land at Junction 10, M56, Stretton a sustainability assessment was carried out. This is known as the ‘Sustainable Development Scorecard’; a tool developed by the Sustainable Development Commission chaired by former Planning Minister Nick Raynsford. The Scorecard provides a basis to assess the extent to which development proposals have the ‘golden thread of sustainable development’ running through them, providing a quantitative assessment of sustainable development credentials, as defined by the National Planning Policy Framework.
- 15.2 The Scorecard is intrinsically based within the context of the NPPF and its three equal pillars of environmental, economic and social sustainability. It is anticipated that by ensuring the Scorecard complements the objectives of the NPPF, planning decisions will become more objective, transparent and consistent, and a wider understanding of sustainable development will begin to emerge.
- 15.3 The Scorecard results are broken down into two scores; an overall ‘Sustainability Score’ which assesses the total contribution from each of the three pillars, and a ‘Parity Score’ which determines how balanced the contribution is from each of the three pillars.

## Development Vision

- 15.4 As the analysis is tuned to the site location and specific development proposals, users can be sure that the assessment is bespoke to each development in question, setting the Scorecard apart from other sustainability certification schemes.
- 15.5 The Scorecard is free to use, meaning landowners, developers, community groups and residents can all assess the same proposal, generating a shared basis for a collaborative, meaningful and impartial discussion. Given the great importance that is attributed to existing policy, Green Belt consideration is not included within the Sustainable Development Scorecard. You can find out more about the background behind the Scorecard in this video: <https://vimeo.com/244731848>.
- 15.6 When assessed using this Scorecard, **Land at Junction 10, M56, Stretton has a total integrated sustainability score of 80%**, with an economic score of 72%, environmental score of 86% and social score of 81%. This results in **a parity score of 87% (see figure below)**.

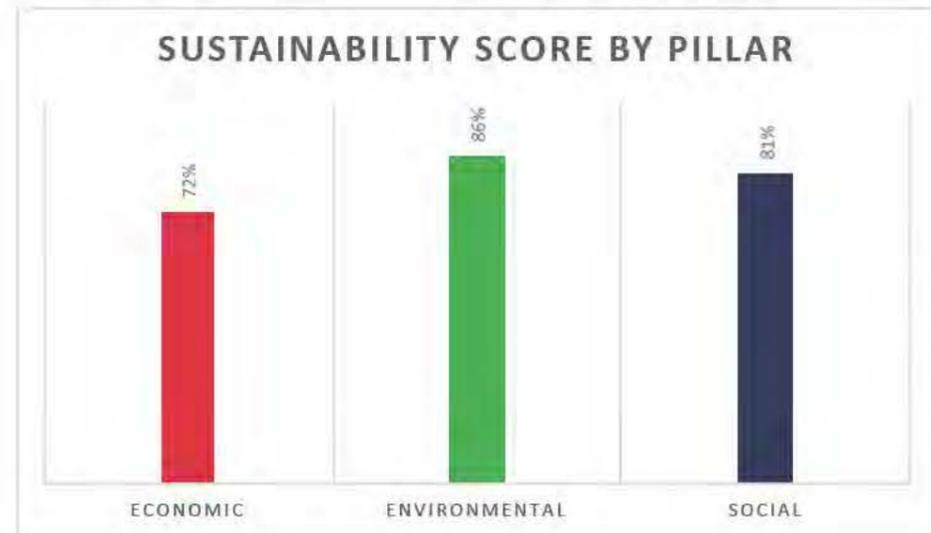


Figure 5. Above & Opposite. Sustainable Development Scorecard Results.

### 16. REVIEW OF THE COUNCIL'S SUSTAINABILITY APPRAISAL FOR THE SITE AND PROPOSAL

- 16.1 As part of this Scorecard assessment, a review of the Council's Sustainability Appraisal (SA) in relation to Land at Junction 10, M56, Stretton has been undertaken.
- 16.2 The review has been conducted based on the site appraisal findings stated in Tables 6.2 to 6.4 in the Sustainability Appraisal.
- 16.3 The following methodology is utilised in the SA whereby the higher score represents a more sustainable proposal. Sites considered for housing are able to achieve a maximum score of 104 based on the following scoring:

- Mitigation likely to be required/unavoidable impacts - 1
- Mitigation may be required/unavoidable impacts - 2
- Unlikely to have a major impact on trends - 3
- Promotes sustainable growth - 4

16.4 Following the Council's methodology in the Sustainability Appraisal score, when all relevant factors are taken into account, the proposal's final score is **78/104**.

### 17. PHASING

17.1 Phasing for this site will be agreed through the SPD process.

17.2 It is recognised that the delivery of the strategic road link through the site is a priority and accordingly the funding of this link through the mechanism of sale of housing land, requires the whole of the site to be released for development in the initial phase of the Local Plan.

### 18. DENSITY ASSUMPTIONS

18.1 Draft Local Plan Policy MD2 suggests that... "to reflect the area's urban fringe location adjacent to the open countryside and the significant levels of green infrastructure proposed throughout the Garden Suburb, the residential development within the Garden Villages should be constructed to an average minimum density of 20dph based on the gross site area".

18.2 The SPD process will finalise the density and scale of housing development across the site. Based on an overall site area of 40ha, the scale of development will be around 800 homes.

### 19. INFRASTRUCTURE CAPACITY AND REQUIREMENTS

19.1 Preliminary studies of the infrastructure capacity in the locality and the design solutions for the movement framework have been carried out. These will form an integral part of the master planning process undertaken as part of the SPD.

### 20. ENVIRONMENTAL SCREENING OPINION

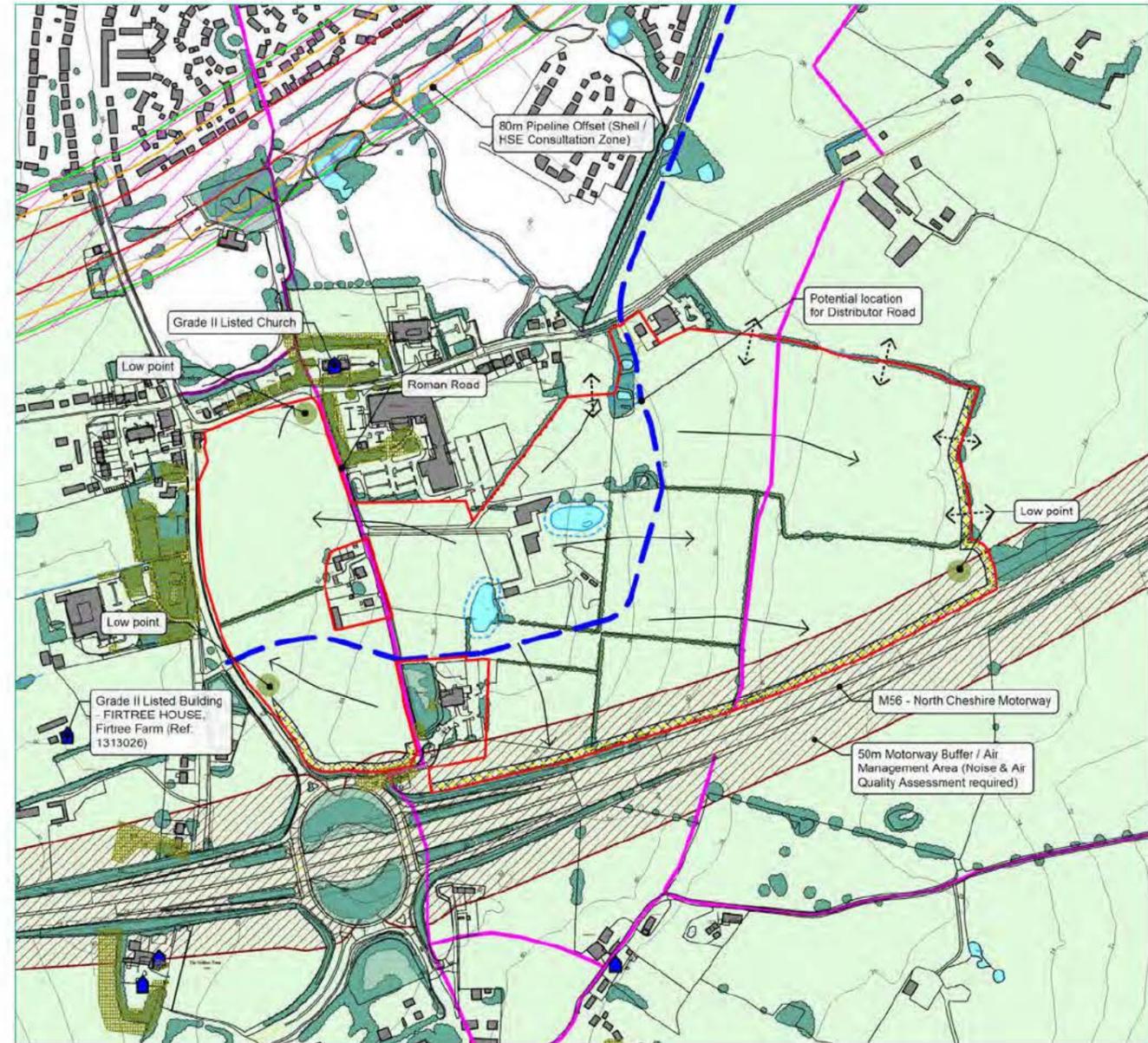
20.1 Wallace requested a screening opinion for the site in November 2018. Owing to:

- a. the size and design of the whole development;
- b. the cumulation with other existing development and/or approved development;
- c. the need to assess and mitigate air quality effects, in the light of the intention to make provision for new road infrastructure to support the growth of Warrington;
- d. the need to demonstrate how mitigation might be designed to prevent significant adverse harm to biodiversity;
- e. the volume of traffic that will access from junction 10 of the M56 within the Motorway Air Quality Management Area (AQMA); and
- f. the presence of landscapes and sites of historical, cultural or archaeological significance;

20.2 The site was found to require an EIA. Wallace agrees with the findings of the screening request and have begun to assess the site, with the intention of commissioning the following surveys amongst others:

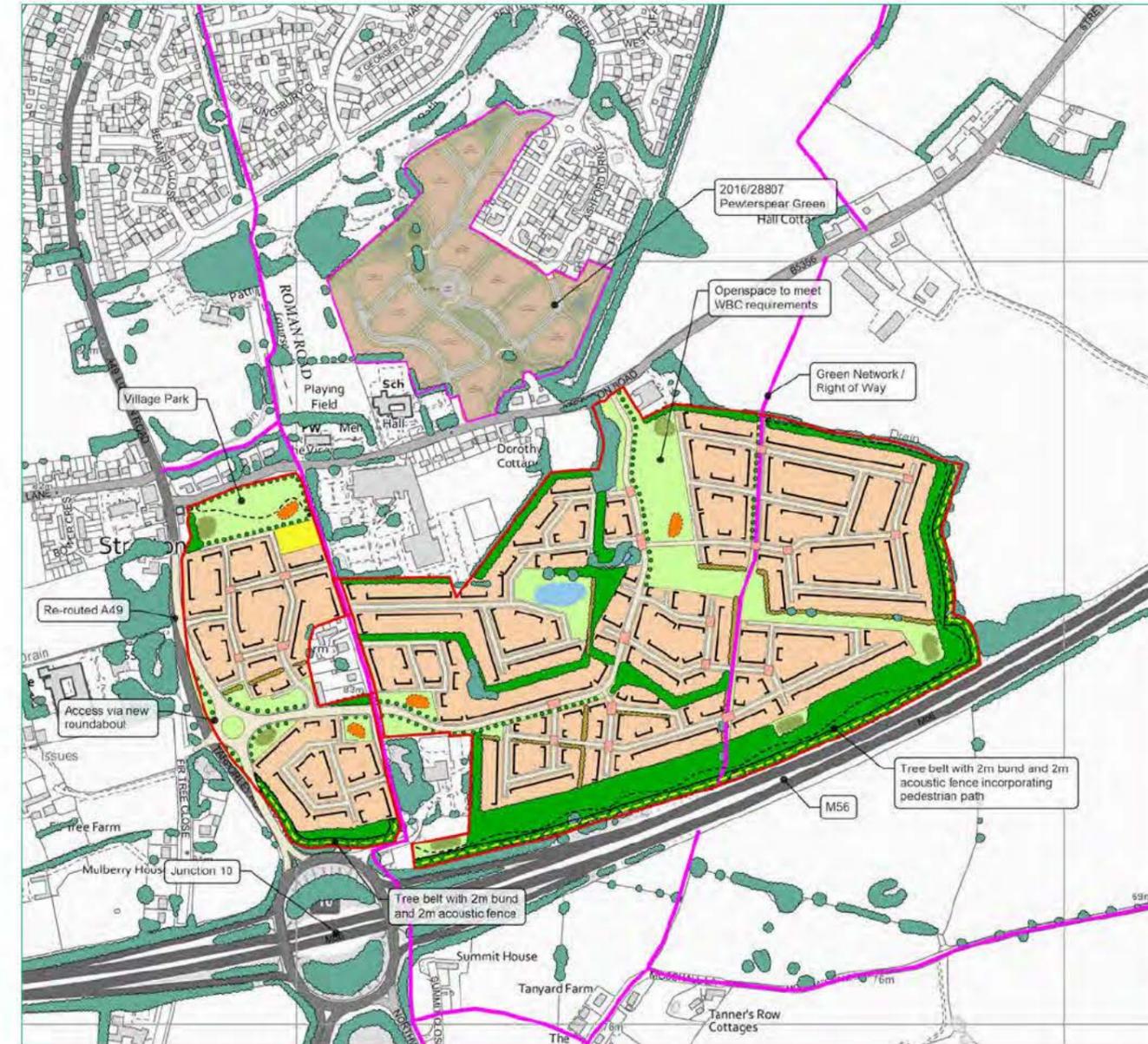
- Breeding Bird Surveys
- Great Crested Newt Surveys
- Badger Survey
- Winter Bird Surveys
- Bat Activity Surveys
- Bat Roost Surveys
- Water Vole Survey
- Topographical Surveys
- Ground Contamination Reports
- Arboricultural Impact Assessment
- Heritage Assessment
- Flood Risk Assessment
- Drainage Assessment
- Landscape & Visual Impact Assessment
- Air Quality Assessments
- Noise Impact Assessments

20.3 Wallace is committed to ensuring the ongoing development of the site is aligned with the environmental principles proposed in Policy MD2 and incorporated into the SPD.



- Site boundary
- Green Belt
- 50m Motorway Buffer
- Tree Preservation Order (TPO)
- Right of Way
- Potential route of Distributor Road
- Existing Trees
- Existing contours - 2m intervals
- Existing waterbody
- Environmental Agency existing waterbody 8m buffer - size to be confirmed
- 80m pipeline offset (Shell / HSE Consultation Zone)
- Pipelines Inner Zones Feb16 - housing development not permitted
- Pipelines Middle Zones Feb16 - housing development restricted
- Pipelines Outer Zones Feb16 - housing development permitted
- Grade II Listed Building
- Direction of slope
- Filtered views
- Potential location for acoustic mitigation
- Potential location for SuDS measures size and location to be determined by engineer

Figure 6. Opportunities & Constraints Plan



- Site boundary
- Residential development
- Frontage
- Primary node
- Street
- Structure planting
- Play areas to meet WBC requirements
- SUDS measure
- Pedestrian path
- Right of Way
- Existing Trees
- Existing hedgerows to be retained
- Proposed Acoustic Bund and Fence
- Area for community use
- 2016/28807 Pewterspear Green (Homes England)

Figure 7. Indicative Development Framework

## Next Steps

21. Following a meeting of all the key landowners, Homes England, Warrington & Co. and the Council, it was agreed that all of the key partners will work closely together to prepare the Supplementary Planning Document (SPD). The Land at Junction 10, M56, Stretton is an integral part of the delivery of the Garden Suburb.

21.1 As explained in this Representation, this site is also an effective site without dependency on the remainder of the Garden Suburb to be delivered. Its development provides the same range of benefits:

- Same strong and defensible Green Belt boundaries to the east and south;
- Same increase in local road capacity by providing a local by-pass to Stretton through the site;
- Infrastructure to service the site is from existing supplies to the west which are not part of the Garden Suburb.

It could be a stand-alone release from the Green Belt should the overall proposal for the Garden Suburb be subject to modification during the Examination of the Draft Local Plan.

21.2 Wallace has already assessed all the key issues and is confident that the site is effective, deliverable and viable. It can deliver all the necessary infrastructure upgrades as required and provide the range of house types and size of houses, community facilities, open space and biodiversity benefits at the start of the Plan period. House completions can be delivered during 2023/24.

### 22. SUMMARY

22.1 The following table summarises that the proposals intended for Land at Junction 10, M56, Stretton will accord with the relevant Draft Local Plan’s Policy MD2 requirements:

Document	Relevant Section of Policy/Document	How Development Proposals Will Respond
<b>Draft Local Plan Policy MD2- Warrington Garden Suburb</b>		
	<b>Affordable Housing</b> In accordance with Policy DEV2 a minimum of 30% of homes should be affordable.	Wallace is basing its development proposals on providing 30% affordable homes, across a range of tenures.
	<b>Density</b> Residential development within the Garden Villages should be constructed to an average minimum density of 20dph based on gross site area.	Wallace is working on proposals at a density of 40 dwelling per gross hectare. The overall site area will accommodate around 800 homes.
	<b>Community Facilities</b> Each Garden Village and the Neighbourhood Centre should provide a range of types and sizes of open space in accordance with the Council’s open space standards. This should include provision of local parks and gardens; natural and semi-natural greenspace; equipped and informal play areas; sports pitches; and allotment plots.	Wallace is proposing the provision of a park located adjacent to the existing village of Stretton to provide a setting to the existing church and historic core of the village along with a comprehensive network of paths. This ensures that the proposal helps form an integrated extension for the existing community.  Open space and play space including both NEAPs and LEAPs will also be provided across the site, in line with Council Guidance.
	<b>Green Infrastructure Network</b> Development will not be permitted which compromises the function of the Strategic Green Infrastructure Network.	Wallace will provide a comprehensive Green Network across the site, including structure planting, SUDS measures, open space, path network, play areas and where possible, retain trees and hedgerows.

	<b>Natural Environment</b> There is a need to protect and enhance existing wildlife corridors and provide new corridors.	Wallace will provide a comprehensive Green Network which will enhance biodiversity and form a key element in the establishment of new wildlife habitats and corridors in the area. Wetland habitats will also be encouraged through the retention or relocation of existing ponds and new SUDS measures.
	<b>Transport &amp; Accessibility</b> There is a requirement to provide a new strategic link connecting the individual villages and the Neighbourhood Centre within the Garden Suburb itself and providing additional connections from the Garden Suburb to the A49 and A50.  The layout of individual development parcels within the Garden Suburb should maximise the potential for walkable neighbourhoods and uptake of public transport.	The proposal will allow for the provision of the strategic link road for the Garden Suburb to be realised in accord with the specification agreed in the SPD. The route of this strategic link road through the site also functions as a local by-pass for the local community in Stretton.  As soon as this link is built through the site, traffic congestion will be reduced with significant benefits for the local community.  Wallace’s proposals will prioritise walkability and access to sustainable modes of transport across the site through a highly legible access network, as well as greening existing Rights of Way.  Wallace will implement the SPD’s response to the Council’s Multi-Modal Transport Report when preparing detailed designs.  Wallace has already instructed SWECO Transport Consultants to prepare preliminary access arrangements from the A49 and Stretton Road into the site.
	<b>Utilities and Environmental Protection</b> A foul and surface water strategy will be required across the Garden Suburb as a whole, incorporating appropriate Sustainable Drainage Systems (SUDS) and flood alleviation measures.  The design of the Garden Suburb must incorporate appropriate measures to mitigate any noise and air quality impacts from the M6, M56, A49 and A50 Knutsford Road.	Wallace’s proposals will incorporate a SUDS strategy which will be informed by a Surface Water and Drainage Assessment.  Wallace will undertake detailed Acoustic and Air Quality Assessments, to guide the mitigation measures such as a bund with acoustic fence to mitigate traffic noise from the M56.
	<b>Historic Environment</b> Development will be required to be designed in order to ensure that these assets and their settings are conserved and, where appropriate, enhanced within the context of the overall development.	The site is located within proximity to two Grade II listed buildings and a Roman Road also runs through the site.  A Heritage Impact Assessment for the Garden Suburb has been prepared, which Wallace will consider when preparing proposals.  Wallace will ensure that a detailed Archaeological & Heritage Impact Assessment is undertaken, which may recommend that an excavation or watching brief is performed before development.  The proposal has already taken into account the setting of the listed buildings and this will be further considered through Landscape and Visual Impact Assessments as well as master planning updates.

## Next Steps

Aecom Garden Suburb Development Framework		
	<p><b>Landscape Character Area 1A Stretton &amp; Hatton</b> The Hatton area comprises a broad, gently undulating agricultural landscape situated to the south-west of the WGS. The highest point is in the north in the form of a Red Sandstone Escarpment that gently falls away the south. The area is strongly influenced by the M56 motorway which runs through the east/west just to the south of the escarpment. Hatton Lane, just north of the M56, is built on the line of a Roman Road. The farmland is a traditional mix of pasture and arable although more recent changes include noticeable areas of horse grazing, fishing ponds and a farm shop development.</p>	<p>Wallace will develop proposals which consider the key characteristics of the Landscape Character Area, including the requirements for landscaping, layout, height, scale and detailed design.</p>
	<p><b>Topography and Watercourses</b> The WGS area has subtly north-facing slopes which falls from London Road, towards Appleton Thorn, then across the central area to the edge of the Bridgewater canal.</p> <p>There are approximately 73 ponds/waterbodies, and six brooks (Lumb Brook, Dingle Brook, Dodd’s Brook and Dipping Brook), and numerous field ditches situated throughout the WGS area. Where possible the natural path of the watercourses within the site should remain.</p> <p>WBC Local Planning Policy QE 4- Flood Risk requires development proposals to avoid the use of culverting and building over watercourses.</p>	<p>Wallace is aware of the existing waterbodies onsite. Waterbodies and watercourses provide opportunities to create an attractive environment. The proposals for the site therefore seek to retain and enhance existing waterbodies on site as part of the overall green and blue network strategy.</p>
	<p><b>Environmental Designations</b> In response to the environmental designation matters, the Development Framework should embed the following principles:</p> <ul style="list-style-type: none"> <li>Retain and enhance existing woodland wherever possible as part of the overall green and blue infrastructure network;</li> <li>Incorporate Appleton Edge as a key settlement boundary with associated amenity value;</li> <li>Enhance existing wildlife corridors along the Bridgewater Canal and strengthen as a primary northern settlement boundary; and</li> <li>Create wildlife corridors along green infrastructure routes to improve links with other areas.</li> </ul>	<p>Wallace supports the SPD’s aim to create a sustainable suburb to Warrington, promoting the protection and enhancement of the existing environmental assets within the area.</p> <p>An Environmental Impact Assessment will be completed prior to any planning application being submitted in respect of Land at Junction 10, M56, Stretton.</p> <p>This will assess all necessary matters of environmental concern, including likely impacts and appropriate mitigation.</p>

	<p><b>Heritage</b> Historic designations should be embedded into the Framework thereby enhancing contextual links to the place and maintaining distinctiveness.</p>	<p>Wallace will utilise the Garden Suburb’s Heritage Impact Assessment and detailed site Archaeological &amp; Heritage Impact Assessments when developing its proposals.</p> <p>This will ensure that the characteristics and history of the Landscape Character Area of Stretton &amp; Hatton are retained and where possible, enhanced.</p>
	<p><b>Placemaking Principles</b> To reinforce and enhance the local identity within Village A, a number of placemaking principles have been proposed:</p> <ul style="list-style-type: none"> <li>The physical and visual relationships between Appleton Thorn, Dudlow’s Green, Stretton, and the proposed communities should be carefully considered and designed;</li> <li>New proposals should look for retention and enhancement of existing local landscape settings and townscape or historic features which contribute to the character of the area; and</li> <li>Careful edge treatment along the M56 and Appleton Thorn village frontage should be considered.</li> <li>Key urban nodes areas, such as around the junction of Stretton Road and the proposed strategic corridors should be recognized through a change of scale up to four storeys materials and functions; and</li> <li>Traditional materials used in Appleton Thorn, such as red brick, red sand stone and white render, are encouraged to be considered or reflected.</li> </ul>	<p>Wallace fully supports the development of placemaking principles and will incorporate these into the proposals.</p>
	<p><b>Vehicular and non-vehicular movement</b> The proposed WGS non-vehicular network will build on existing, established footpaths and cycle/bridleways. potential location of these routes will be integrated with proposed green infrastructure to ensure that all areas of WGS are accessible by non-vehicular modes in attractive, car free environments.</p> <p>WGS will incorporate an enhanced vehicular movement network through a series of new and upgraded routes. These improvements will be phased over time in response to development trajectory and in order to link new and existing communities.</p> <p>The primary loop is seen as the principal public transport corridor linking back to Warrington via the A49 and A50.</p>	<p>The development will allow for the provision of the strategic link road to be realised.</p> <p>Wallace’s proposals will prioritise walkability and access to sustainable modes of transport across the site through a highly legible access network, as well as greening of Rights of Way.</p>

## Next Steps

	<p><b>Green Infrastructure</b> The proposed WGS Green Network will be formed around a four-tier hierarchy. For the villages, there will be open spaces which will form smaller scale green infrastructure and create local destinations for recreation, sustainability and activity.</p> <p>The proposed green buffers define the WGS boundaries, provide the required separation to established housing areas and enhance permeability and sustainability of the area.</p>	<p>Wallace will incorporate green buffers to enhance sustainability in accord with this hierarchy.</p> <p>A comprehensive Green Network across the site will be provided, including structure planting, SUDS measures, open space, path network, play areas and where possible, retain trees and hedgerows.</p>
	<p><b>Community &amp; Social Infrastructure</b> A fundamental ambition for WGS is the creation of a new sustainable community in south Warrington. Hand in hand with this requirement is the ability to deliver the desired level of social infrastructure in parallel with housing and employment, thus an associated sense of belonging</p>	<p>Wallace supports the inclusion of the proposed social infrastructure within the Garden Suburb including proposals for Village A. Linkages from the Wallace proposal to Village A's centre will be created in accord with the requirements in Policy MD2 and the requirements reached in the Supplementary Planning Document.</p>

**This document was prepared by Icen Projects on behalf of Wallace Land Investments**

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## Land off Smithy Brow, Croft

Warrington Local Plan Review  
Proposed Submission Version: Regulation 19 Consultation  
Iceni Projects on behalf of Wallace Land Investments

**June 2019**

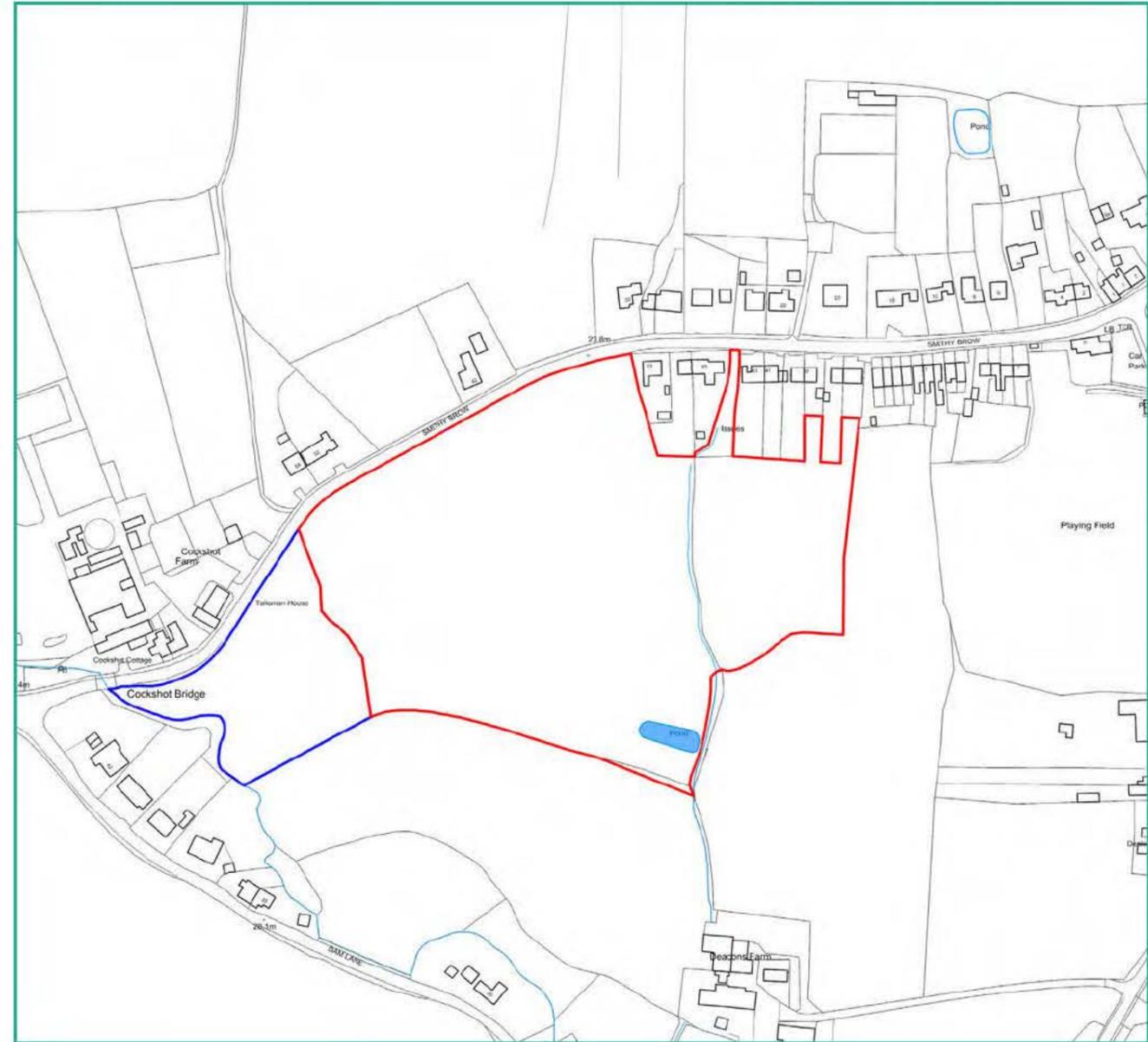


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10.	Development Vision
14.	Comparing Land Off Smithy Brow Against Proposed Allocations
20.	Conclusion



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- Site boundary - 4.08ha / 10.08ac
- Additional area within title ownership - 0.73ha / 1.8ac

Figure 1. Site Location Plan



- Site boundary
- Additional area within title ownership

Figure 2. Aerial Site Location Plan

## Introduction

1.0 Wallace controls 4.1 ha (10.1 acres) of land off Smithy Brow, Croft. This has the potential to provide a sustainable development that can accommodate up to approximately 90 new homes (30% of which to be affordable), informal and formal public open space, serviced site for convenience store and locally equipped area of play.

1.1 Wallace considers that further development in the outlying settlements can help deliver early housing completions in the early period of the Local Plan to help ensure that the Council meets its housing and requirement and maintains a 5 year effective housing land supply.

1.2 Wallace prepared representations which were submitted at the Preferred Development Options (PDO) (September 2017) stage. The representations included a vision document for Land at Smithy Brow presents an opportunity to accommodate residential development on a sustainable and deliverable site.

1.3 As an essential characteristic of the Green Belt is the long term permanence of its boundaries. It is important that the process of establishing long term Green Belt boundaries has regard to the potential development needs of Croft arising in the longer term. Identifying sufficient, suitable and sustainable land to be released from the Green Belt now will ensure that the boundaries will not need to be changed post 2037.

### 2. NEED FOR GROWTH IN THE OUTLYING SETTLEMENTS

2.1 The Local Plan Draft defines an approximate number of homes the Council considers could be accommodated in each of the outlying settlements. This set out in Policy DEV1 – Housing Delivery which indicates in DEV1 (4) that:

**A minimum of 1,085 homes will be delivered on allocated sites to be removed from the Green Belt adjacent to the following outlying settlements:**

- a. Burtonwood - minimum of 160 homes**
- b. Croft - minimum of 75 homes**
- c. Culcheth - minimum of 200 homes**
- d. Hollins Green- minimum of 90 homes**
- e. Lymm - minimum of 430 homes**
- f. Winwick - minimum of 130 homes**

2.2 The Council's development strategy for the outlying villages only allocates one site for 75 homes at Croft, out of 1,085 homes to be allocated. This is 7% of the overall housing land requirement.

2.3 Wallace has highlighted in its General Representations to the Draft Local Plan, that there are delivery issues due to lead-in times; infrastructure and remediation costs with a number of the brownfield sites in the Draft Local Plan's initial plan period (Years 0-5). This will inevitably lead to a delay in the delivery of effective housing land readily available for development at the adoption of the Local Plan. The reduction in the effective brownfield land supply means that more greenfield land within the outlying settlements is necessary to achieve the Council's growth aspirations. Accordingly, greenfield sites which can utilise existing infrastructure capacity and are immediately effective will deliver homes within the early years of the plan period.

2.4 Notwithstanding the concern about the sites currently allocated in the Draft Plan, Wallace maintains that additional sustainable, and effective housing land is required over and above that already identified in the Draft Local Plan. It should be noted that the 20% flexibility requires a further 1,890 homes to be allocated on sites in the Green Belt, given the capacity of the sites in the Urban Capacity is relatively fixed at 13,726 homes. In terms of the future release of sites in the Green Belt, it is proposed that up to 40% should be allocated to the outlying settlements (750 homes) with the balance (1,140 homes) being delivered from further sites in the South Warrington Garden Suburb. Neither the Waterfront or the South West Urban Extension are considered to offer any real prospects of increasing completion rates from its land supply in the initial period of the Local Plan.

2.5 As Croft is currently only required to provide 7% of the Council's housing land requirement for its development strategy in the outlying villages, its housing target should be increased by 52 homes (7% of the proposed increase of 750 homes) to 127 homes in total. This means allocating a minimum of **127 homes for Croft** is a consequence of **increasing the flexibility allowance from 10% to 20%**. It is recommended that, subject to specific site assessments, the settlement growth for Croft is increased proportionately to a minimum of 127 homes.

### 3. CROFT'S POTENTIAL TO ACCOMMODATE FURTHER DEVELOPMENT

3.1 According to the Settlement Profile Document (2017), Croft has a population of approximately 1,367 persons based on 606 households. The minimum number of new homes for Croft has been increased from 60 new homes identified in the in the PDO to a revised figure of **minimum 75** new homes for Croft. This is welcome but only represents 12% increase on the current settlement size.

3.2 Croft is an attractive village location, but there is a lack of choice of range and type of housing in Croft.

3.3 The village has a historic core stretching along Smithy Brow and Lord Street on an east west access. This was expanded in the 1960s, 1970s and 1980s with poorly integrated "suburban form of development," predominantly located to the south east of Lord Street and bounded by New Lane.

3.4 In order to support the sustainability, vitality and future prosperity of the village and to provide much needed housing choice as well as meeting local housing needs, Wallace recommends that the Council, subject to specific site assessment, should accommodate a **minimum of 127 homes in Croft**.

### 4. SUSTAINABILITY OF THE SITE'S LOCATION IN CROFT

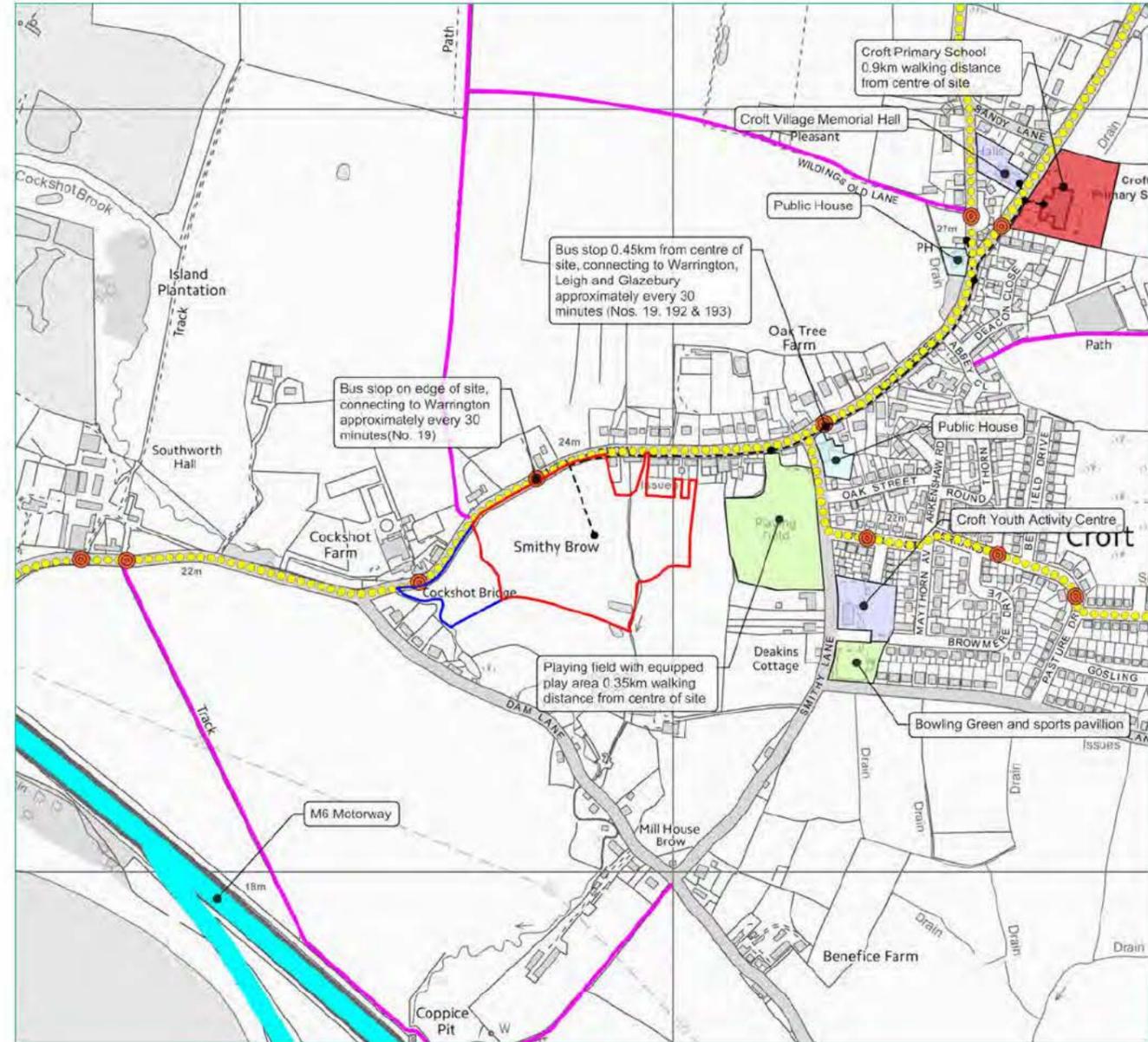
4.1 The strategic location of the Borough between the two city regions of Cheshire and Lancashire means that the outlying villages of Warrington offer a highly desirable and attractive location to live. This applies to Croft where average house prices are among the highest across the outlying settlements.

4.2 Croft's locational advantage is its proximity to the M6 Junction 21A and M62 interchange which provide regional and national connections. Croft is also within close proximity to the Warrington urban area and the major employment hubs at Birchwood and Risley, with nearby connections to the A59 and A579, enabling ease of access to nearby Winwick and Culcheth.

4.3 According to the Settlement Profile Document (July 2017), the age profile for the Culcheth, Glazebury and Croft ward is 16.3% aged under 16, 61.9% aged 16-64, and 21.8% aged 65+ (2015). This is a relatively young demographic profile.

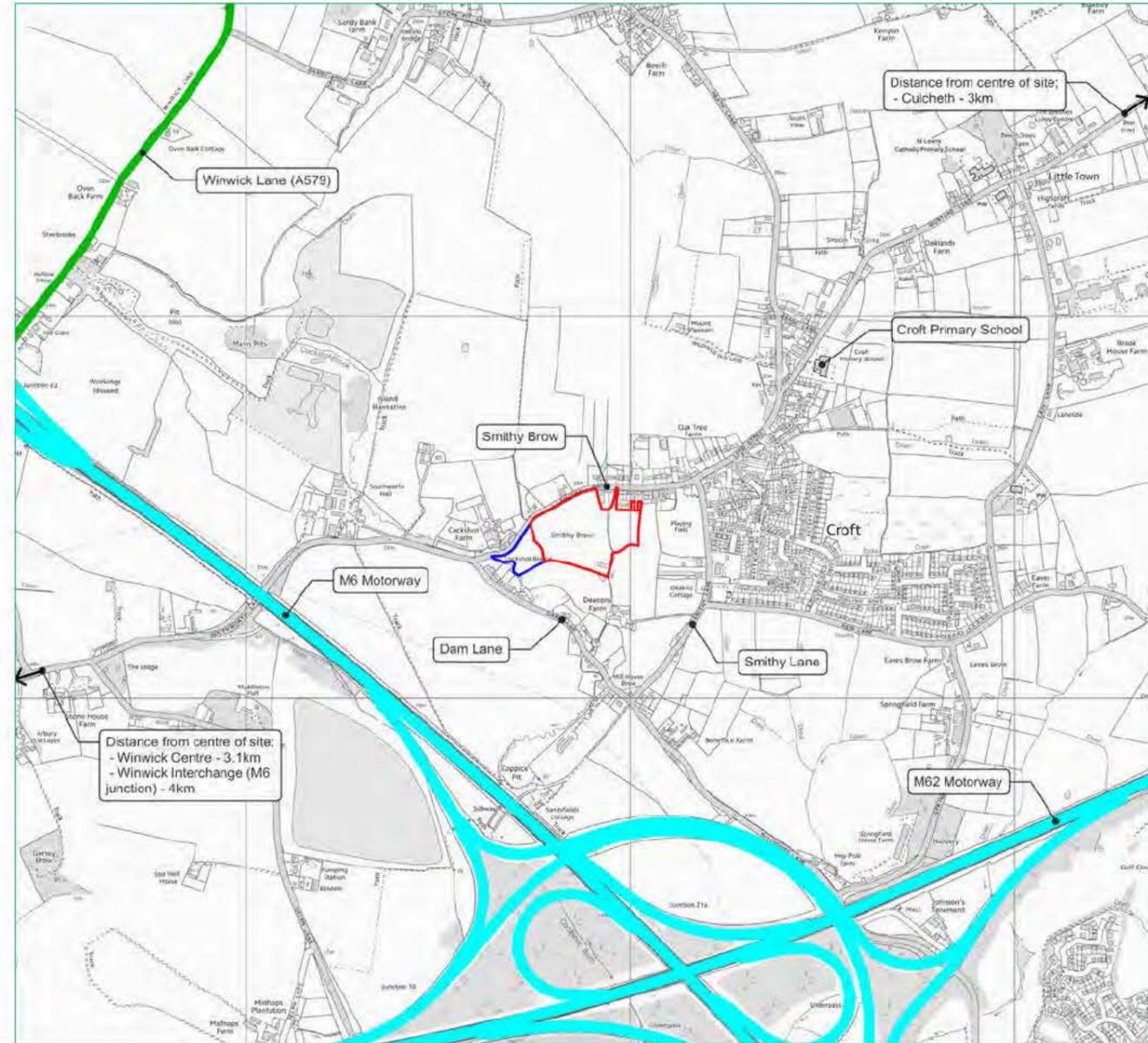
4.4 The site is situated at the hub of the village's current amenities. To the east is the Horseshoe Inn public house, the youth activity centre, bowls club, and playing fields and within 800m north (along Smithy Brow) is Croft Primary School. Bus services are available immediately adjacent to the site on Smithy Brow.

4.5 Croft Primary and St. Lewis Catholic Primary Schools are located less than a mile away. Birchwood Community High School is located approximately 3.5 miles south of the site and Culcheth High School 3 miles north east. Birchwood Technology Park is less than 3 miles away and supports over 165 businesses and over 6,000 employees.



- Site boundary
- Additional area within title ownership
- Land use: School
- Land use: Leisure (hotel, pub etc.)
- Land use: Outdoor sports facilities
- Land Use: Community
- Bus route
- Bus stop
- Walking distance from centre of site
- Motorway

Figure 3. Sustainable Location Plan



- Site boundary
- Additional area within title ownership
- Motorway
- 'A' Road

Figure 4. Strategic Location Plan

## Development Vision for Land Off Smithy Brow

### 5. GREEN BELT ALLOCATION

5.1 The site was submitted via the Call for Sites in 2016 (References **R18/098** and **R18/052**). It was assessed in the 2017 SHLAA as part of the ongoing process to identify the Council's 'deliverable' and 'developable' supply of housing land.

5.2 Land off Smithy Brow, Croft was assessed within the 2017 and 2018 SHLAA as being 'constrained' due to its designation as Green Belt. It is apparent that the site's SHLAA assessment takes the format of the standardised response used by the Council when assessing Green Belt sites, noting that "*Sites within the Green Belt, unless in compliance with the provisions of appropriate development as defined by the NPPF, are considered unsuitable due to policy constraints. In such circumstances, it is premature for the SHLAA to endorse specific sites in the Green Belt as suitable for residential development in advance of any comprehensive review of Warrington's Green Belt to evaluate whether there are appropriate locations for future development.*"

5.3 The Green Belt Assessment (October 2016) assessed individual parcels within the defined character areas. Land off Smithy Brow is identified as Reference **CR8** and is assessed as providing an overall **Moderate** contribution to the function of the Green Belt.

5.4 CR8 is assessed as the following:

- No contribution: to check the unrestricted sprawl of large built-up areas
- Weak contribution: to prevent neighbouring towns merging into one another
- Strong contribution: to assist in safeguarding the countryside from encroachment
- No contribution: to preserve the setting and special character of historic towns
- Moderate contribution: to assist urban regeneration by encouraging the recycling of derelict and other urban land.

5.5 The Green Belt Report Addendum (July 2017) assessed all sites that had been submitted as part of the 2016 Call for Sites consultation. Land at Smithy Brow was again, assessed as performing a **moderate contribution** to Green Belt purposes.

### 6. RSK LANDSCAPE ASSESSMENT ABOUT THE SITE'S CONTRIBUTION TO THE GREEN BELT

6.1 RSK was commissioned by Wallace to review the Council's analysis and categorisation of the site - Land at Smithy Brow. The RSK assessment was submitted to the Council at the PDO stage.

6.2 The RSK assessment identified shortcomings in the Council's analysis of the site's contribution to the Green Belt as it did not fully appreciate or consider the durability of the boundaries between the site and wider countryside to the south. Both of these features can contain encroachment. In addition, although there are open views within the immediate vicinity of the site, long views are restricted by further vegetation and urban form between the site and open countryside.

6.3 RSK determined that Land at Smithy Brow provided a **moderate contribution to Purpose 3** rather than the **strong contribution** concluded in the Green Belt Assessment. In light of this, RSK concluded that the overall classification should be amended so that Land at Smithy Brow is categorised as providing an overall **weak contribution** to Green Belt purposes.

6.4 Compared to the proposed allocated site at Deacon's Close, this site makes a lower contribution to the Green Belt and is therefore a better site to consider for future development.

### 7. AGRICULTURAL LAND CLASSIFICATION

7.1 The site comprises mainly of Grade 3, which is good to moderate quality agricultural land, as described in MAFF (1988) *Agricultural Land Classification of England & Wales*. The Council's proposed allocation at Deacon's Close, Croft is also Grade 3.

### 8. TOPOGRAPHY

8.1 The site is relatively flat but slightly undulates from east to west and rises up slightly towards Smithy Brow in the west. The topography of the site does not pose any constraints to the site's development.

### 9. DRAINAGE / FLOODING

9.1 Environment Agency flood mapping confirms it is in Flood Zone 1 and therefore is at low risk of flooding. An appropriate flood risk assessment will be undertaken as part of a planning application. The proposal will incorporate SUDS measures to ensure that surface water from the proposal meets greenfield run-off requirements.

### 10. PROPOSAL

10.1 The site presents an opportunity to accommodate residential development within easy reach of existing amenities in Croft. It can accommodate up to approximately 90 new homes (up to 30% of which to be affordable) together with informal and formal public open space and a locally equipped area of play along with a serviced site for a convenience store.

10.2 Homes will include 2, 3, 4 and 5-bedroom market houses and affordable housing. All homes will be accessible within a safe environment. The proposal is designed to integrate with the existing urban structure of Croft and provide a logical extension with ease of access to Croft's existing amenities such as the playing fields, Pub, youth centre and bowling green. The proposal also provides the opportunity to locate a new village convenience store.

10.3 Vehicular, pedestrian and cycle access will be provided off Smithy Brow with an easily accessible network of paths and public rights of way.

10.4 The movement hierarchy in and around the site will provide safe and convenient access for pedestrians and cyclists. This is achieved through a combination of shared surface lanes and a remote path network.

10.5 Structure planting will be provided along the southern, eastern and western boundaries of the site. These existing field boundaries around the site will be strengthened to form a new inner Green Belt boundary. The structure planting will provide visual screening and an attractive edge to the development. The structure planting will also incorporate rural paths around the site. These boundaries will promote biodiversity and form a key element in establishing of new wildlife habitats and corridors in the area.

### 11. JUSTIFICATION OF THE ALLOCATION OF LAND AT SMITHY BROW, CROFT FOR 90 HOMES

11.1 The Council's development strategy allocates 75 homes out of 1,085 homes to Croft. This represents 12% increase on the village's current scale of housing. For the reasons submitted in Wallace's representation about the housing land requirements, Wallace recommends that the flexibility allowance should be increased from 10% to 20%, adding a further 1,890 homes to the housing land requirement. Wallace considers that 750 homes should be added to the overall requirement to be met in the outlying villages. This provides an opportunity to add smaller sites which are immediately effective and can deliver completions in the early years of the Local Plan. Applying a proportionate increase of this additional housing, this increases the scale of housing to be allocated in Croft to 127 homes.

11.2 As such, Wallace proposes the allocation of Land off Smithy Brow, Croft which could support the sustainable growth of the village and at the same time, support the growth aspirations for Warrington. The site will provide a minimum of **90** dwellings, together with a potential convenience store, play area and public open space. Whether this site should be in addition to Deacon's Close or be a substitute for the proposed allocation, would be subject to assessments of its comparative Green Belt contribution and its sustainability.





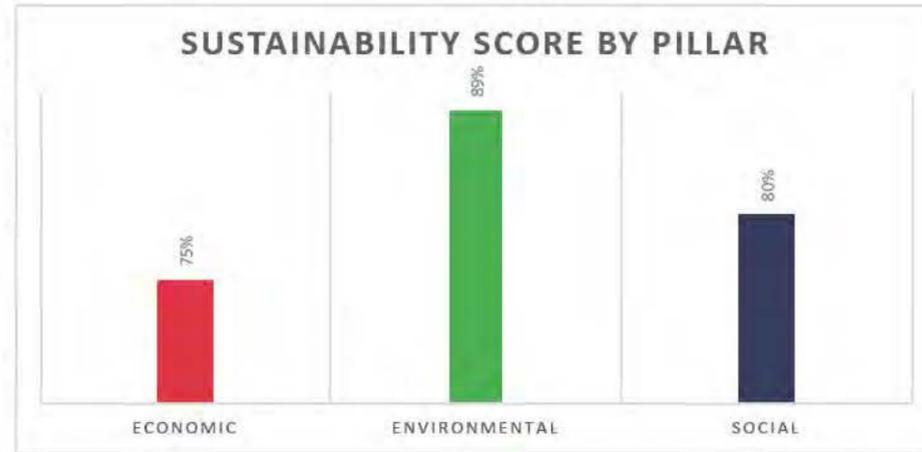
## Comparing Land Off Smithy Brow Against Proposed Allocations

### 12. SUSTAINABILITY SCORECARD ASSESSMENT

12.1 As part of the background work used to inform Wallace's choice at Land at Smithy Brow, Croft, the 'Sustainable Development Scorecard' has been utilised. This is a tool developed by the Sustainable Development Commission, chaired by former Planning Minister Nick Raynsford. The Scorecard provides a basis to assess the extent to which development proposals have the... 'golden thread of sustainable development' running through them, providing a quantitative assessment of sustainable development credentials, as defined by the National Planning Policy Framework (NPPF).

12.2 The Scorecard results are broken down into two scores; an overall 'Sustainability Score' which assesses the total contribution from each of the three pillars and is the most important measurement for the sustainability of the site. The 'Parity Score' determines how balanced the contribution is from each of the three pillars.

12.3 When assessed, **Land at Smithy Brow, Croft has a total integrated sustainability score of 81%** and when broken down, its economic score is 75%, its environmental is 89% and its social score is 80%.



### 13. COUNCIL'S SUSTAINABILITY APPRAISAL OF LAND AT SMITHY BROW, CROFT

13.1 As part of Wallace's Local Plan response, a review of the Council's Sustainability Appraisal for Land at Smithy Brow, Croft has been carried out.

13.2 The review has been conducted based on the site appraisal findings stated in Tables 6.2 to 6.4 in the Sustainability Appraisal (SA). The following methodology is utilised in the SA and a higher score represents a more sustainable development. Sites considered for housing are able to achieve a maximum score of 104.

- Mitigation likely to be required/unavoidable impacts - 1
- Mitigation may be required/unavoidable impacts - 2
- Unlikely to have a major impact on trends - 3
- Promotes sustainable growth - 4

13.4 The Council's Sustainability Appraisal score for Land at Smithy Brow was for an employment site and was **53/76**. In conducting a review of the SA, modifications are required to accommodate the current proposal which promotes the site for residential and not employment use. The revised score for Land at Smithy Brow, as a residential development, is increased to **77/104**.

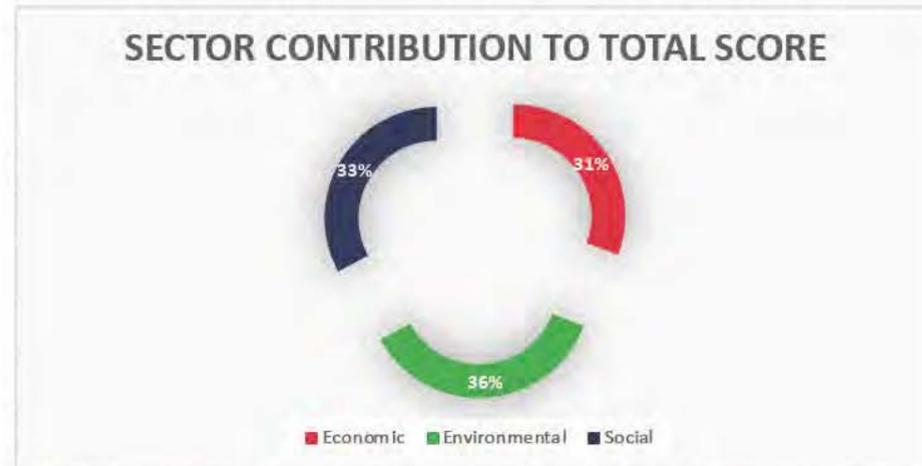


Figure 9. Sustainable Development Scorecard Results. Land at Smithy Brow, Croft

13.5 The proposal by Wallace Land has a more diverse land use including residential use, open space, areas of play and a convenience store. The site has ease of access to existing community facilities and includes both natural green space and formal play space. Primary and secondary schools with a surplus of places are also in the vicinity of the site. A health centre is located less than 2 miles away in Culcheth. This leads to a higher outcome in terms of sustainability.

### 14. REVIEW OF POLICY OS2 - DEACONS CLOSE (75 HOMES)

14.1 The Draft Local Plan proposes to allocate land to the north east of Croft adjacent to Deacons Close for a minimum of 75 homes at a density of 30 dph. The following highlights issues associated with this proposed allocation:

1. Sustainability of the Proposed Allocation
2. Strength of Resultant Green Belt Boundaries; and
3. Effectiveness of the Allocated Site

14.2 These issues fundamentally impact on the underlying reasons for this site's allocation in the Draft Local Plan.

#### Sustainability of Proposed Allocation

14.3 Using the Sustainability Scorecard, the land at Deacons Close, Croft was found to have a **total integrated sustainability score of 72%** and when broken down, its economic score was 67%, environmental 71% and social 78%. The parity score is **88%** which is the same as Land at Smithy Brow. This compares to a higher **total integrated sustainability score of 82%** for Land off Smithy Brow.

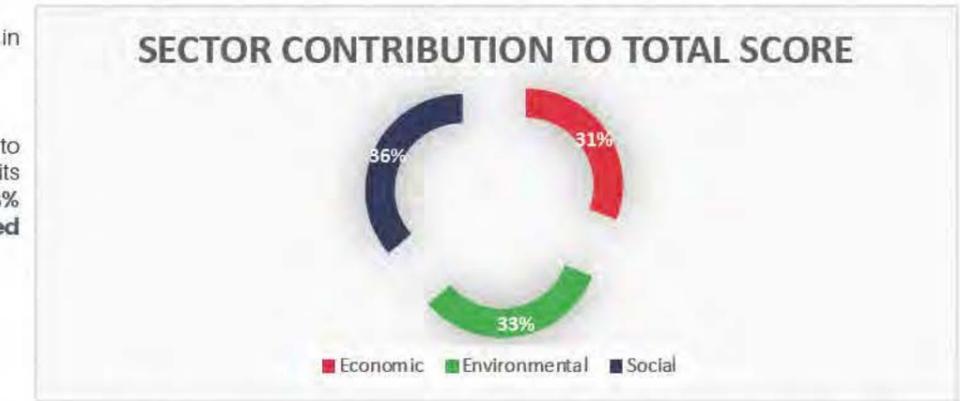


Figure 10. Sustainable Development Scorecard Results. Deacons Close, Croft

## Comparing Land Off Smithy Brow Against Proposed Allocations

### Strength of the Resultant Green Belt Boundaries

14.4 The Green Belt Assessment (October 2016) assessed the functionality of Warrington's Green Belt in accordance with the five functions of the Green Belt. The Study distinguished Green Belt functionality into four categories:

- No contribution;
- Weak contribution;
- Moderate contribution; and
- Strong contribution.

14.5 In terms of Green Belt, the Draft Allocated Site at Deacons Close is within Parcel CR4. The Assessment finds this parcel makes a **“moderate contribution”** overall with a **Strong Contribution** under **Purpose 3 - to safeguard the countryside from encroachment**.

***Reasoning: “The boundaries between the parcel and the settlement to the south and west are non-durable consisting of the rear gardens of residential properties with fences/hedges. These boundaries would not be able to prevent encroachment into the parcel.” The assessment also states that “The parcel is connected to the countryside along two boundaries. The existing land use consists predominantly of undeveloped countryside with a church and residential development in the north eastern corner of the parcel. The parcel also includes Heathcroft Stud stables and Oaklands Farm. The parcel is flat with less than 10% built form however there is an area of dense woodland to the south of the parcel with some tree lining along field boundaries within the parcel. The parcel therefore supports a strong-moderate degree of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment due to its openness and non-durable boundaries with the settlement”***

14.6 Based on the reasoning set out above, the proposed site at Deacon's Close results in the Green Belt boundaries which are weak and allow further unchecked encroachment into the Green Belt especially to the north and west. In terms of the comparison between the proposed allocation at Deacon's Close and Wallace's site land at Smithy Brow, it is evident that Land at Smithy Brow is not just more sustainable, it has a lower contribution to the Green Belt. Both assessments support the allocation of Land at Smithy Brow instead of Deacon's Close.

### Effectiveness of the Allocated Site

14.7 The Options and Site Assessment Technical Report (2019) conducted by the Council

states that appropriate access can be provided. However, Wallace recommends that this should be reconsidered as the site's access is considered to be constrained.

14.8 In terms of access, Wallace notes that the proposed access is a somewhat tortuous single point of access via Abbey Close/Lord Street junction. This access arrangement is not suitable for such an intensification of use, especially its visibility to the left from Abbey Close is already sub-standard for the 30mph speed limit on Lord Street. There could also be an issue with cul-de-sac lengths for the far reaches of the site.

14.9 Pedestrians tend to use Deacons Close and the Abbey Close to access the village centre and the Primary School. The carriageway is only about 4m wide as it approaches the access to the Stud. This is not suitable for two-way access for vehicles with a pedestrian footpath at the entrance to the site. Third party land is likely be required to widen the road and create a pedestrian footpath at the entrance to the site. Wallace considers this to be unachievable due to the proximity of house plots at the entrance to the site.

14.10 The need for mitigation is already highlighted in the Draft Policy which states that...***A package of transport improvements will be required to support the development***

14.11 Whilst the Policy states that the site performs well against the objectives of the Local Plan, the NPPF and the Local Plan Sustainability Appraisal, Wallace concludes that site is constrained.

14.12 Access to employment in Warrington Town Centre, the Westbrook and Omega and further afield to Liverpool and Manchester is via the motorway network. This will mean travelling westwards using Smithy Brow through the village from the site at Deacon's Close. Access to the closest employment areas in Birchwood to the south will be from the through the village via Smithy Lane to Locking Stumps. Both pass through the village from the site at Deacon's Close, passing the site proposed by Wallace. Wallace highlights that by allocating the site at Smithy Brow, all traffic travelling to these employment areas will not have to pass through the village, alleviating traffic impact.

14.13 The supporting text for Policy OS2 states that site is relatively unconstrained and that it can be delivered in the early part of the Plan period. Given its investigations, Wallace has concluded that the proposed allocated site is constrained and that major junction improvements will be necessary to allow access to the site. It is inevitable that these road improvements will require third party land. The road upgrading works may not be physically possible at the entrance to the site off Deacon's Close due to the proximity of house plots and therefore the site may be undeliverable.

14.14 Given that the deliverability of the site in doubt, The Council should seek confirmation to prove that access can be achieved to the requirements of the Council. If this cannot be proven then the site should be deemed constrained and no-effective. Wallace's site at Smithy Brow should therefore be substituted and released from the Green Belt.

## 15. CONCLUSION

15.1 Given the evidence presented above, Wallace concludes that the Integrated Sustainability Score for Deacons Close of **72%** and is substantially lower than the **81%** achieved at Land off Smithy Brow, as demonstrated in the Sustainability Checklist.

15.2 The Council's evidence from its Green Belt Assessment is that the proposed allocation does at Deacon's Close not fully meet the requirements and necessary criteria to be released from Green Belt. In particular, it performs a **Moderate Contribution** to the purposes of Green Belt overall and a **Strong Contribution to Purpose 3** as independently assessed in the Green Belt Assessment (2016). This is compared to the overall **Weak Contribution** of Smithy Brow as assessed by RSK.

15.3 Wallace notes that the proposed access is a constrained and somewhat tortuous single point of access via Abbey Close/Lord Street junction.

15.4 The site at Deacon's Close is in active use, demonstrated by the Options and Site Assessment Technical Report (2019), and its availability for housing is therefore limited. In comparison, Land at Smithy Brow is immediately available and is effective.

## Overall Conclusion

- 16.1 Wallace agrees that Green Belt land is required to meet the housing land requirements.
- 16.2 Wallace considers that the Council’s development strategy has too great a reliance on completions from sites in the Urban Capacity in the short term and that completions from the Waterfront and South West Urban Extension will be delayed. Accordingly, the flexibility allowance needs to be increased from 10% to 20%. This requires a further 1,890 homes to allocated on sites in the Green Belt, including the outlying settlements. Given the need is for effective sites which can deliver completions in the short term, Wallace recommends 40% of this housing land requirement (750 homes) is delivered in the outlying villages. In terms of proportionality, this represents a 7% increase for Croft or a total of 127 homes to be allocated in the village.
- 16.3 Wallace agrees that it is crucial that the sites that are allocated in the outlying settlements are suitable, sustainable and deliverable in the Plan Period. It has been shown above that the site currently allocated in the Draft Plan at Deacon’s Close, Croft is seriously constrained because of its inadequate vehicular and pedestrian access.
- 16.4 As part of the sustainability appraisal comparing both sites, the Land at Smithy Brow, Croft is more sustainable site than the proposed allocation at Deacon’s Close:

**Table 1. Sustainability Scores for Croft Sites**

Site	Integrated Sustainability Score (%)	Economic Sustainability Score (%)	Environmental Sustainability Score (%)	Social Sustainability Score (%)	Parity Score
OS2. Deacons Close, Croft	72	67	71	78	88
Land at Smithy Brow, Croft (Wallace)	81	75	89	80	88

- 16.5 The integrated score of 81% for Land at Smithy Brow compares favourably to only 72% at Deacon’s Close.
- 16.6 Land at Smithy Brow as an allocation to the west of Croft makes a more logical extension to the village, adding to its urban structure to the east of Smith Lane, and thereby balancing the settlement’s built form. Its allocation would also help ease access to the west to Winwick and to the south towards Birchwood and Risley.

- 16.7 land at Smithy Brow can be delivered immediately without any major infrastructure improvements. The evidence provided by Wallace in its General Representations and above, demonstrates that there is a potential under delivery of completions on effective sites at the beginning of the plan period.
- 16.8 The site can accommodate up to approximately 90 new homes of a range of type and size (along with up to 30% affordable). In addition, the site will provide informal and formal public open space and a site for a potential new village convenience store.
- 16.9 Wallace requests that the current site at Deacon’s Close is deleted from the Draft Local Plan as it is constrained regarding access and Land at Smithy Brow is allocated.
- Recommendation for Modification to the Draft Local Plan**
- 16.10 Wallace recommends that the Land off Deacon’s Close is deleted from the Draft Local Plan and Land at Smithy Brow allocated for 90 homes, informal and formal public open space, a new village convenience store and locally equipped area of play to deliver completions within the early part of the plan period.

**This document was prepared by Icen Projects on behalf of Wallace Land Investments**

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## Land South of Hatton Lane, Stretton

Warrington Local Plan Review  
Proposed Submission Version: Regulation 19 Consultation  
Iceni Projects on behalf of Wallace Land Investments

**June 2019**

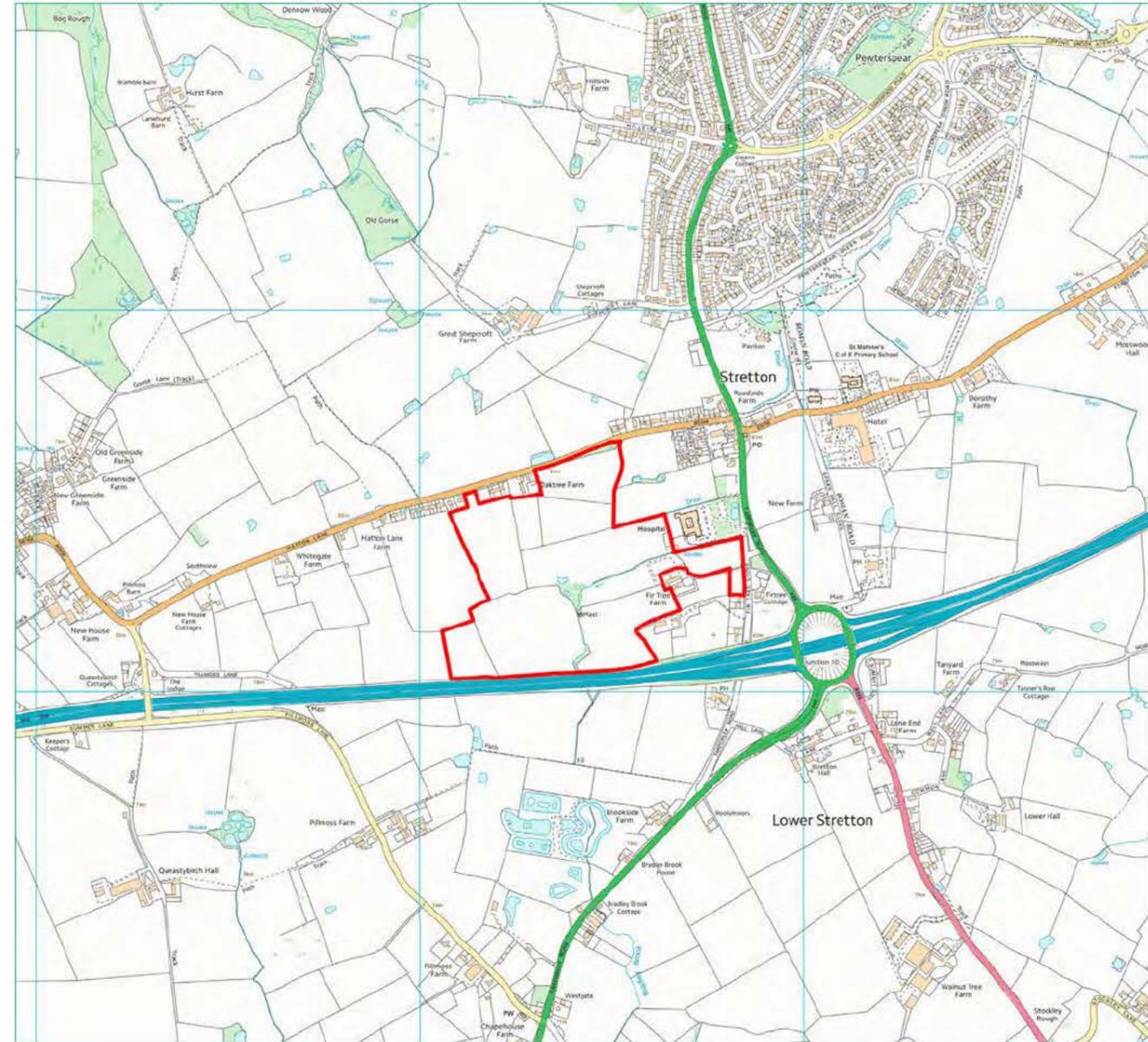


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- 8. Development Vision
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This document was prepared by IcenI Projects on behalf of Wallace Land Investments  
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Site boundary

Figure 1. Site Location Plan



Site boundary

Figure 2. Aerial Site Location Plan

## Introduction

1.0 Wallace controls 27ha (66.6 acres) of land around the suburb of Stretton, to the south of Warrington. The site is located immediately off Junction 10 of the M56, to the west of the A49 and referred to in this submission as Land South of Hatton Lane.

1.1 The site has been submitted as part of the SHLAA process. Land that has been submitted within the proximity of Land South of Hatton Lane, Stretton includes a small parcel of land adjacent to M56, Stretton **reference R18/002** and land to the north of Hatton Lane identified as **R18/09, R18/10, and R18/153**.

1.2 Wallace has previously identified that the site presents a strategic development opportunity to accommodate the development of between 400-510 new homes, up to 30% affordable. The site was presented to the Council as an effective and sustainable development opportunity in previous representations, submitted at the Call for Sites (November 2015) Issues and Options (December 2016) and Preferred Development Options (PDO)(September 2017) stages.

### 2. NEED FOR SAFEGUARDED LAND TO SUPPORT THE COUNCILS DEVELOPMENT STRATEGY

2.1 Wallace has submitted representations about the Council’s assessment of its Housing Land Requirement; the implications of its development strategy in terms of delivering the scale of completions from sources of land supply as indicated in its Housing Trajectory and the implications and risk that the Local Plan will not deliver a 5 year effective housing land supply at its date of adoption. Wallace has made recommendations to address these concerns by adopting the following:

- Setting the housing requirement of 22,680 homes as an absolute minimum;
- Acknowledging that the Council’s regeneration projections such as Warrington Waterfront may take longer to deliver the level of completions assumed in the Council’s Housing Trajectory;
- Increasing the flexibility allowance from 10% to 20% to add 1,890 additional homes to be released from land in the Green Belt;
- Recommending that 40% (750 homes) should distributed to the outlying villages with the remaining 1,140 homes released through a review of phasing in South Warrington Garden Suburb; and
- Designating land to be safeguarded to avoid a requirement to review the Green Belt boundaries to release more land within the Local Plan period if the Council cannot maintain a 5year effective housing land supply.

2.2 In this representation Wallace considers that further land should be safeguarded

in accordance with the NPPF, to build in necessary flexibility to accommodate the Council’s growth strategy without the need for further Green Belt reviews.

2.3 During the PDO Regulation 18 Consultation Wallace supported the Council’s intention and provision of safeguarded land within the Local Plan in line with the NPPF18 which states in paragraph 139:

#### **When defining Green Belt boundaries, plans should:**

- ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;**
- not include land which it is unnecessary to keep permanently open;**
- where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;**
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;**
- be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and**
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.**

2.4 In the PDO document the Council concluded that the provision of 15 year supply of land would appear to conform to the requirements of NPPF (2012, para 157). Wallace proposed at that stage that a 20-year time horizon would be a more appropriate timescale. Such a time horizon would ensure proper plan making for the future and provide a framework for robustly managing, shaping, and the protecting the Green Belt beyond the plan period. It will also provide certainty to the development industry and local communities of the likely growth locations beyond the end of the plan period.

2.5 In this Regulation 19 Consultation on the Submission Version of the Local Plan, Wallace questions the Council’s decision to remove all references to providing safeguarded land.

2.6 Wallace recommends that actual housing need in Warrington should be higher than 18,900 homes over the plan period. Indeed, the Council identified a higher level of housing requirement in the Regulation 18 consultation on the Plan. Wallace has set

out its case for an increase in the flexibility allowance from 10% to 20% (set out in the General representations made by Wallace). In line with this case, Wallace has set out a revised land requirement over the Plan Period, as shown in the below table.

	<b>Council</b>	<b>Wallace</b>
<b>Annual Target</b>	945	945
<b>2017 to 2037</b>	18,900	18,900
<b>Flexibility</b>	@10% 1,890	@20% 3,780
<b>Total Requirement</b>	20,790	22,680
<b>Urban Capacity</b>	13,726	13,726
<b>Green Belt Requirement</b>	7,064	8,954

2.7 In summary, if the case for greater flexibility (20% rather than 10%) is accepted then the Council is only able to demonstrate a maximum of 4.24 years’ supply at the point of adoption of the Local Plan. Wallace considers that a detailed site-by-site assessment into site effectiveness will highlight that scale and rate of completions from the Urban Capacity sites would diminish.

2.8 In order to remedy a potential shortfall in its effective housing land supply over the plan period the Council’s development strategy needs to be modified as follows:

- allocate other sites in the Green Belt such as small and medium sized sites in and around existing settlements which are capable of delivering housing completions in the short-term. Wallace proposes that a further 750 homes should be allocated proportionally in the 6 outlying settlements; and
- reconsider the phasing of sites within the Garden Suburb so that more completions can be delivered during the Local Plan’s first five year period. These sites would not be reliant on the delivery of infrastructure on other sites within the Garden Suburb. Wallace recommends that up to 1,140 completions should be identified through a revised phasing programme.

2.9 Wallace considers that there is a real threat that the Council’s development strategy in terms of the scale of completions proposed in the Housing Trajectory will not deliver a 5 year effective housing land supply throughout the period of the Local Plan. Consequently, a further review of the Local Plan will be required in accord with Policy DEV1 – Housing Delivery.

**“ Should monitoring indicate that a 5- year deliverable and / or subsequent developable supply of housing land over the Plan Period can no longer be sustained, the Council will give consideration to a review or partial review of the Local Plan.”**

2.10 The NPPF is clear about the need to maintain a supply of land for housing and this includes land to meet longer term development needs stretching “...well beyond the plan period...” and that local authorities should satisfy themselves that Green Belt boundaries “...will not need to be altered at the end of the development plan period...”.

2.11 In accord with NPPF, Wallace proposes that in order to satisfy this requirement, further land should be safeguarded to help provide robust long-term Green Belt inner boundaries providing certainty for local communities and for developers, clearly demarcating locations for future development during the plan period.

2.12 As an example, Wallace considers that sites such as its Land to the South of Hatton Lane, Stretton is the type of opportunity to be considered. This site provides the logical extension in the longer term to extend the South Warrington Garden Suburb given its strategic location at Junction 10. Its release for development in the future is not dependent on infrastructure delivered within the Garden Suburb. Wallace recommends that reference to safeguarded land should be placed back into the Local Plan, and that triggers should be provided which would indicate when safeguarded land would be considered for release.

2.13 This trigger should follow the Housing Delivery Test (HDT) introduced in the NPPF 2018. This requires action to be taken if delivery falls below 95% of the Council’s annual housing requirement<sup>1</sup>. The release of safeguarded land could then be linked to this trigger if the Local Plan does not meet its annual housing requirement. In this circumstance, the Council should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years. Furthermore, where the HDT indicates that the delivery of housing is below 85% over the last three years, a flexibility of 20% should be added to the five-year housing land supply requirement of the authority.

2.14 In this context, the provision of safeguarded land provides the Council with greater certainty in meeting its annual housing land requirement throughout the plan period. This can be brought forward at the appropriate time through an update of the Plan as set out in paragraph 139 of the NPPF.

**...make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;**

<sup>1</sup> It is noted that the HDT 2018 has Warrington at 55%.

## Development Vision

### 3. GREEN BELT ALLOCATION

3.1 The site is currently located within Warrington Green Belt, established in 2006. The Green Belt Study (October 2016) assessed the functionality of Warrington’s Green Belt. It defined large areas into 24 different character areas and assessed them in accordance with the five functions of the Green Belt, namely:

1. To check the unrestricted sprawl of large built up areas;
2. To prevent neighbouring towns from merging into one another;
3. To assist in safeguarding the countryside;
4. Preserving the setting and special character of historic towns; and
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

3.2 It distinguished Green Belt functionality into four categories:

- No contribution;
- Weak contribution;
- Moderate contribution; and
- Strong contribution.

3.3 In the Regulation 18 Consultation, Land South of Hatton Lane, Stretton was identified within General Assessment Character Area 13, assessed as serving a strong contribution to Green Belt purposes. Wallace has however questioned the validity of this assessment, given the characteristics of the Green Belt in this locality.

3.4 General Assessment Character Area 13 was assessed as having a strong contribution in respect of Purpose 1 and 3; weak contribution to Purpose 2; no contribution to Purpose 4 and a moderate contribution to Purpose 5.

3.5 Wallace highlighted that at the individual site level, functionality will differ significantly between land parcels within the General Assessment area as a whole.

3.6 As part of the second stage in the process, the Green Belt Assessment (October 2016) then went on to assess individual parcels within the defined character areas. Land south of Hatton Lane, Stretton **was not assessed** as part of this process. The Green Belt Addendum (July 2017) assessed all sites that had been submitted as part of the Call for Sites Process 2016. However, Land South of Hatton Lane, Stretton was not submitted at these Stages, and remains un-assessed by the Council.

3.7 Whilst Land South of Hatton Lane, Stretton has not been assessed, it is apparent that land adjoining its boundary has been. Site **Reference WR49** was assessed as providing an overall **weak contribution to Green Belt purposes** and was scored weak on Purposes 1,2,3,4 and moderate when assessing Purpose 5. Furthermore, the Green Belt Report Addendum (July 2017) assessed Site **Reference R18/02** as providing an **overall weak contribution** to the purposes Green Belt.

3.8 In the Regulation 18 Consultation, Wallace invited the Council to undertake the Green Belt assessment of the site – Land South of Hatton Lane and conclude whether Land South of Hatton Lane, Stretton serves a weak contribution to Green Belt purposes. This would accord its conclusions on the Green Belt relating to Sites WR49 and R18/02. This whole site appraisal was not carried out by the Council.

3.9 In responding to this Regulation 19 Consultation, Wallace invites the Council to reconsider the site’s contribution in the Green Belt. If it is concluded that the site makes a weak contribution to the Green Belt, the Council should remove the site from the Green Belt, identifying the new boundary for the Green Belt.

3.10 Wallace submits that the site should be considered as a safeguarded site in the Warrington Local Plan. A vision for the site is detailed below, demonstrating how the land could be sensitively developed. Wallace recommends against the site being promoted as part of the Garden Suburb as it’s a standalone proposal able to deliver its own infrastructure requirements. The safeguarding is in addition to the Garden Suburb.

3.11 The site presents a strategic development opportunity to accommodate a potential developable area of 16.04 ha (39.63 acres), capable of accommodating between 400 – 510 new homes, up to 30% of which will be affordable.

3.12 Vehicular access to the site will be provided from Tarporley Road (A49) to the east and from Hatton Lane (B5356) to the north. Pedestrian and cycle access can also be provided onto Tarporley Road (A49) and Hatton Lane with an easily accessible and safe network of paths and public rights of way.

3.13 The provision of a distributor road through the site from these access points will improve the local highway network by limiting usages of the A49 / Stretton Road/Hatton Road signalised junction. It effectively delivers a local by-pass around Stretton on the west and provides through traffic relief. This has the major benefit of providing enhanced amenity and environmental benefits for existing residents within Stretton. Public transport will also benefit from access to this distributor road. The distributor road will have a series of residential areas along it and will be divided by tree belts and open spaces, helping to create interest and character along this route.

3.14 The movement hierarchy around the site will provide safe and convenient access for pedestrians and cyclists. This is achieved through a combination of shared surface lanes and a remote path network.

3.15 The site has the potential to accommodate 2, 3, 4- and 5-bedroom market houses and affordable housing. All homes will be accessible within a safe environment. The proposal is designed to integrate with the existing village of Stretton. An area of open space to the north west of the site provides a gateway entrance to the existing village, setting to the historic core of the village and ensures that the proposal forms a natural extension to the existing community.

3.16 Open space and play space provision is located throughout the proposal and will be in accord with Council requirements.

3.17 Structure planting will be provided along the southern and western boundaries of the site, providing a new and defensible inner boundary for the Green Belt. The structure planting will provide visual screening from the motorway and an attractive edge to the development.

3.18 The structure planting will incorporate rural paths around the edge of the proposal, with regular links into the proposal and easy access opportunities to the surrounding countryside. The structure planting around the site will also help promote biodiversity and form a key element in the establishment of new wildlife habitats and corridors in the area.

3.19 This proposal will provide improved local access and affordable homes, but not at the expense of the area’s character.

### 4. SUSTAINABILITY | SITE LOCATION

4.1 The site is located to the west of Junction 10, M56, Stretton and benefits from nearby local amenities within Stretton and south Warrington. It also has benefit of easy access to Stockton Heath, the nearby core area for social and retail amenities.

4.2 There are two main centres of employment along the M56 at the adjacent motorway junctions. Appleton and Stretton Trading Estates is located 2 miles east of the site and Daresbury Business Park is located around 3 miles to the west.

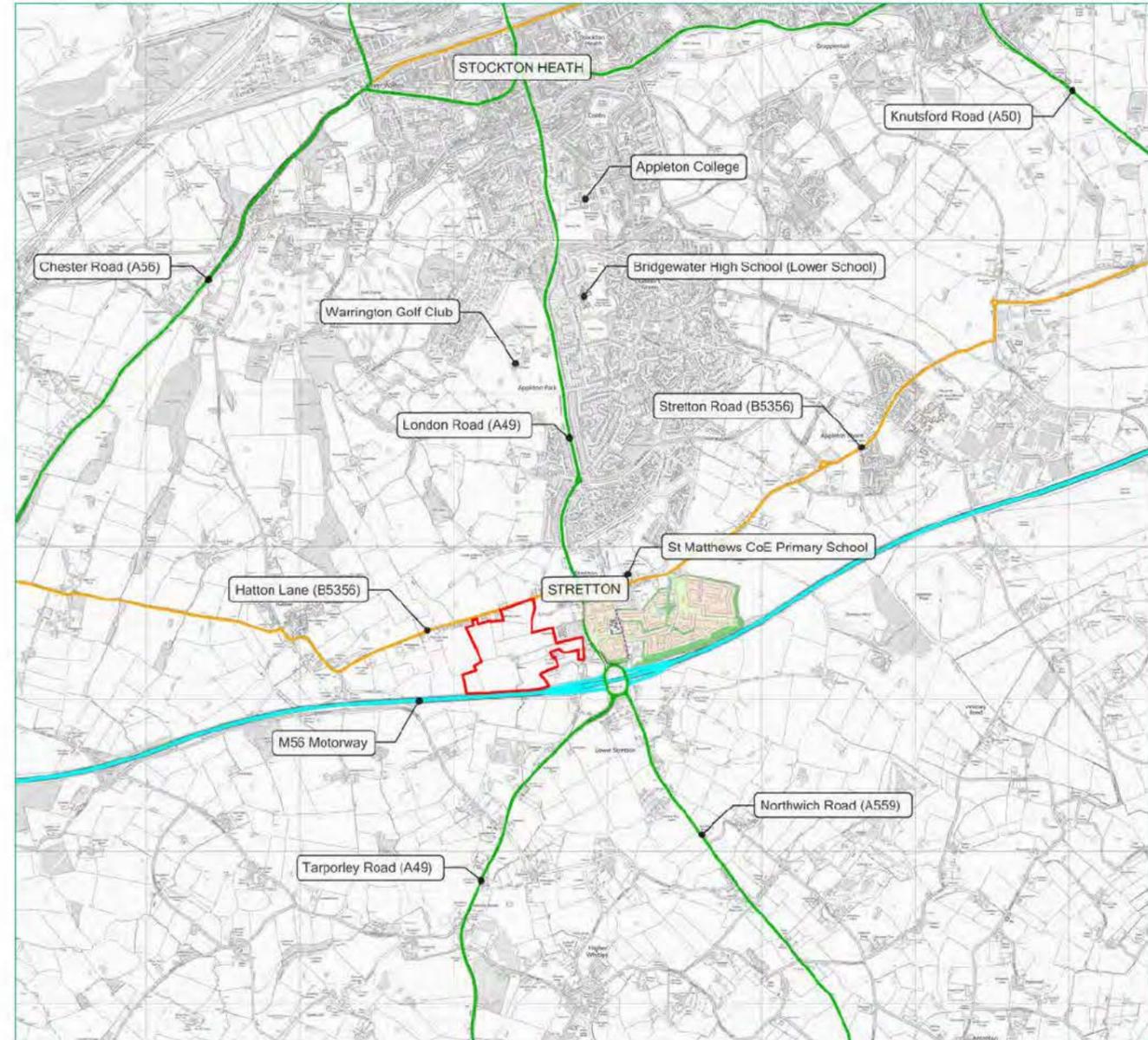
4.3 Although having motorway access, Daresbury Business Park and Appleton and Stretton Trading Estates lack integration with local settlements and consequently rely heavily on the car as a primary form of transport. The majority of cars travelling east to west rely on

the B5356/Hatton Lane and have to currently pass through the Hatton Lane/A49/Stretton Road signalised Junction.

4.4 Located directly to the east of the site is Spire Private Hospital with a Post Office, local shop, hotel and public house all located within 200m from the centre of the site. The local primary school (Stretton St Matthews) is situated approximately 1.1km to the east of the site off Stretton Road and Bridgewater High School is located 3km to the north of the site.

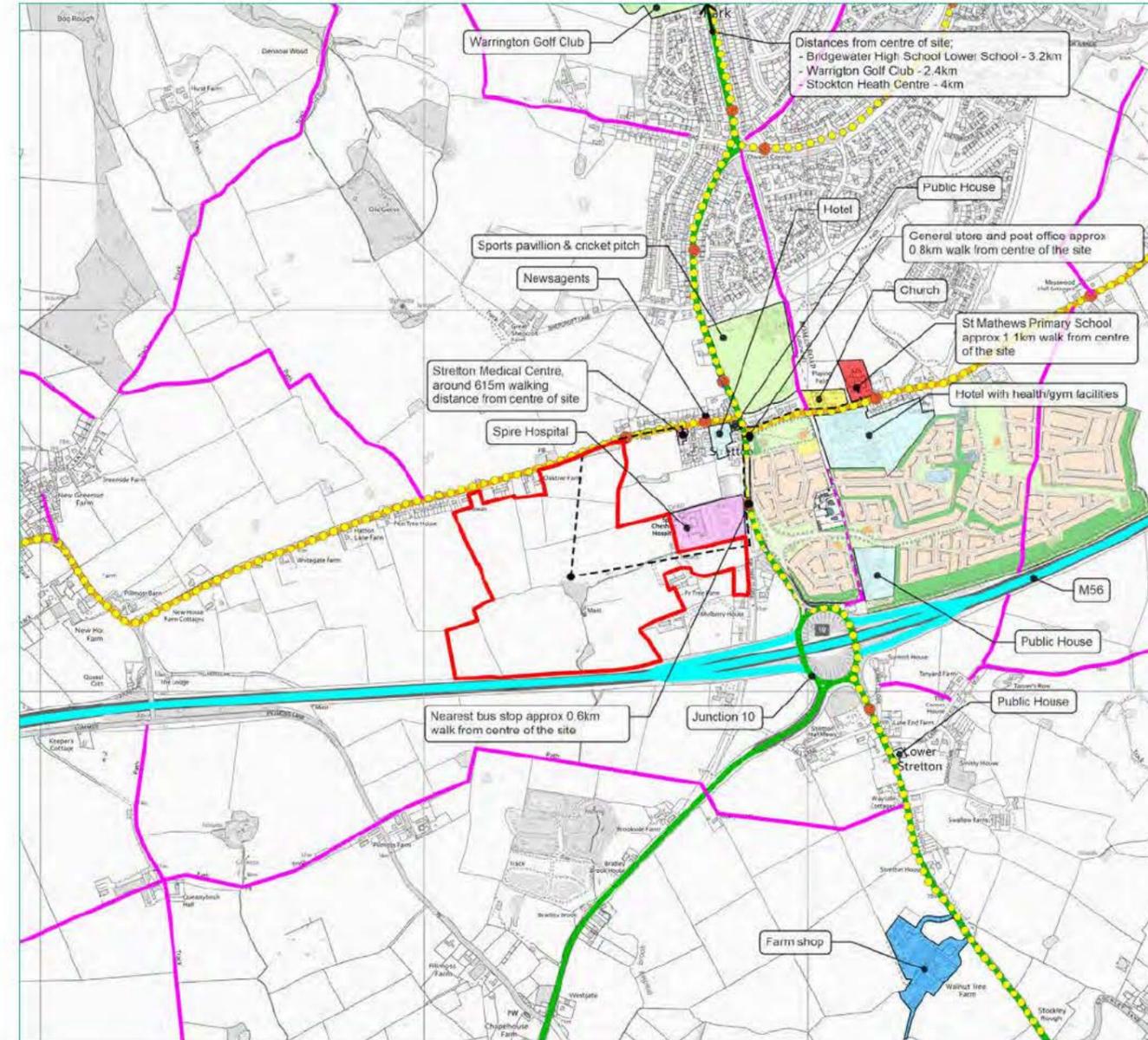
4.5 Bus services are available immediately adjacent the site on the A49 and the B5356. The nearest bus stop is located within easy walking distance, approximately 300m from the centre of the site. A number of bus services already operate around the site, including hourly services to Stockton Heath and on to Warrington.

4.6 The vision for this site provides the opportunity for more sustainable and comprehensive local highway solution by diverting traffic flows around the existing signalised A49/ Stretton Road/ Hatton Lane junction. It provides the opportunity to build new homes whilst utilising existing local amenities with direct access to public transport services. The site has access to a motorway network, allowing connections to the wider area. This is highlighted on the Strategic Site Location Plan.



- Site boundary
- Stretton 1
- Motorway
- 'A' Road
- 'B' Road

Figure 3. Sustainable Location Plan



- Site boundary
- Stretton 1
- Land use: School
- Land use: Retail
- Land use: Leisure (hotel, pub etc.)
- Land use: Place of Worship
- Land use: Health
- Land use: Outdoor sports facilities
- Motorway
- 'A' Road
- 'B' Road
- Public Right of Way
- Bus stop
- Bus route
- Walking distance from centre of site

Figure 4. Strategic Site Location Plan

## Development Vision

### 5. SUSTAINABILITY | SCORECARD ASSESSMENT

- 5.1 As part of the background work being completed to inform Wallace’s proposal at Land South of Hatton Lane in terms of sustainability, the ‘Sustainable Development Scorecard’ has been utilised. This is a tool developed by the Sustainable Development Commission chaired by former Planning Minister Nick Raynsford. The Scorecard provides a basis to assess the extent to which development proposals have the... ‘golden thread of sustainable development’ running through them, providing a quantitative assessment of sustainable development credentials, as defined by the National Planning Policy Framework.
- 5.2 The Scorecard is intrinsically based within the context of the NPPF and its three equal pillars of environmental, economic and social sustainability. It is anticipated that by ensuring the Scorecard complements the objectives of the NPPF, planning decisions will start to become more objective, transparent and consistent.
- 5.3 The Scorecard results are broken down into two scores; an overall ‘Sustainability Score’ which assesses the total contribution from each of the three pillars, and a ‘Parity Score’ which determines how balanced the contribution is from each of the three pillars.
- 5.4 As the analysis is tuned to the site location and specific development proposals, users can be sure that the assessment is bespoke to each development in question, setting the Scorecard apart from other sustainability certification schemes.
- 5.5 When assessed, **Land South of Hatton Lane** was found to have a **total Integrated sustainability score of 79%** and when broken down, its economic score is 70%, its environmental score is 86% and its social score is 81%, **producing a parity score of 85%**.

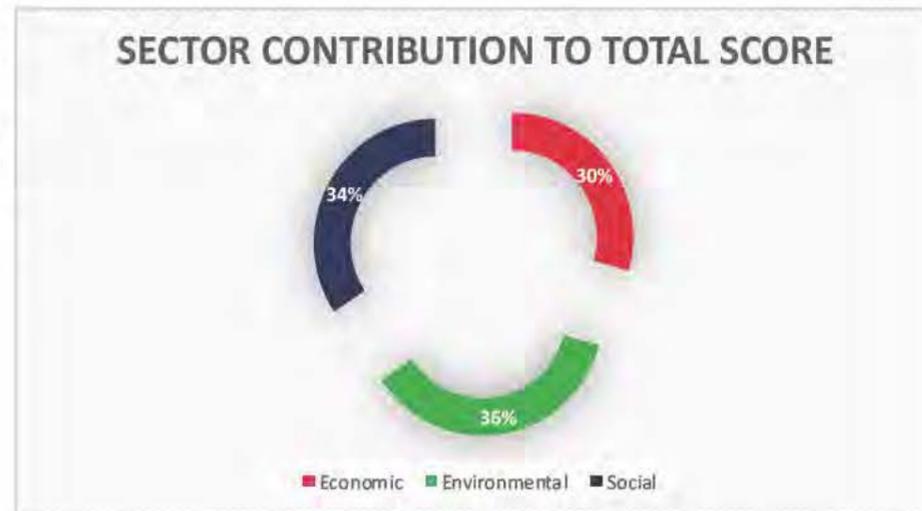


Figure 5. Sustainable Development Scorecard Results. Land South of Hatton Lane

### 6. COUNCIL’S SUSTAINABILITY APPRAISAL OF THIS SITE

- 6.1 As part of this response, a review of the Council’s Sustainability Appraisal in relation to Land South of Hatton Lane has been carried out.
- 6.2 The review has been conducted based on the site appraisal findings stated in Tables 6.2 to 6.4 in the Sustainability Appraisal. This scores each site against criteria deemed to be of importance for the sustainability of Warrington, depending on whether the site is considered for housing or employment.
- 6.3 The following methodology is utilised in the Council’s Sustainability Appraisal with the higher score, representing a more sustainable site. Sites considered for housing able to achieve a maximum score of 104.
- Mitigation likely to be required/unavoidable impacts – 1
  - Mitigation may be required/unavoidable impacts – 2
  - Unlikely to have a major impact on trends – 3
  - Promotes sustainable growth – 4
- 6.4 The Sustainability Appraisal score for Land South of Hatton Lane, Stretton was found to be **46/76** (it was considered as an employment site by the Council). However in conducting this review, the site is considered as a residential proposal. The revised score for Land South of Hatton Lane, Stretton is **76/104**.
- 6.5 In justifying this revised assessment, the site promotes a greater diversity of uses including amenity open space, play areas and a buffer zone to separate the site from the M56. This buffer means that housing is outside the M56 AQMA. The site is close to Stretton, the M56 and nearby employment areas, and is able to utilise local community facilities with schools and healthcare nearby.

### 7. PHASING

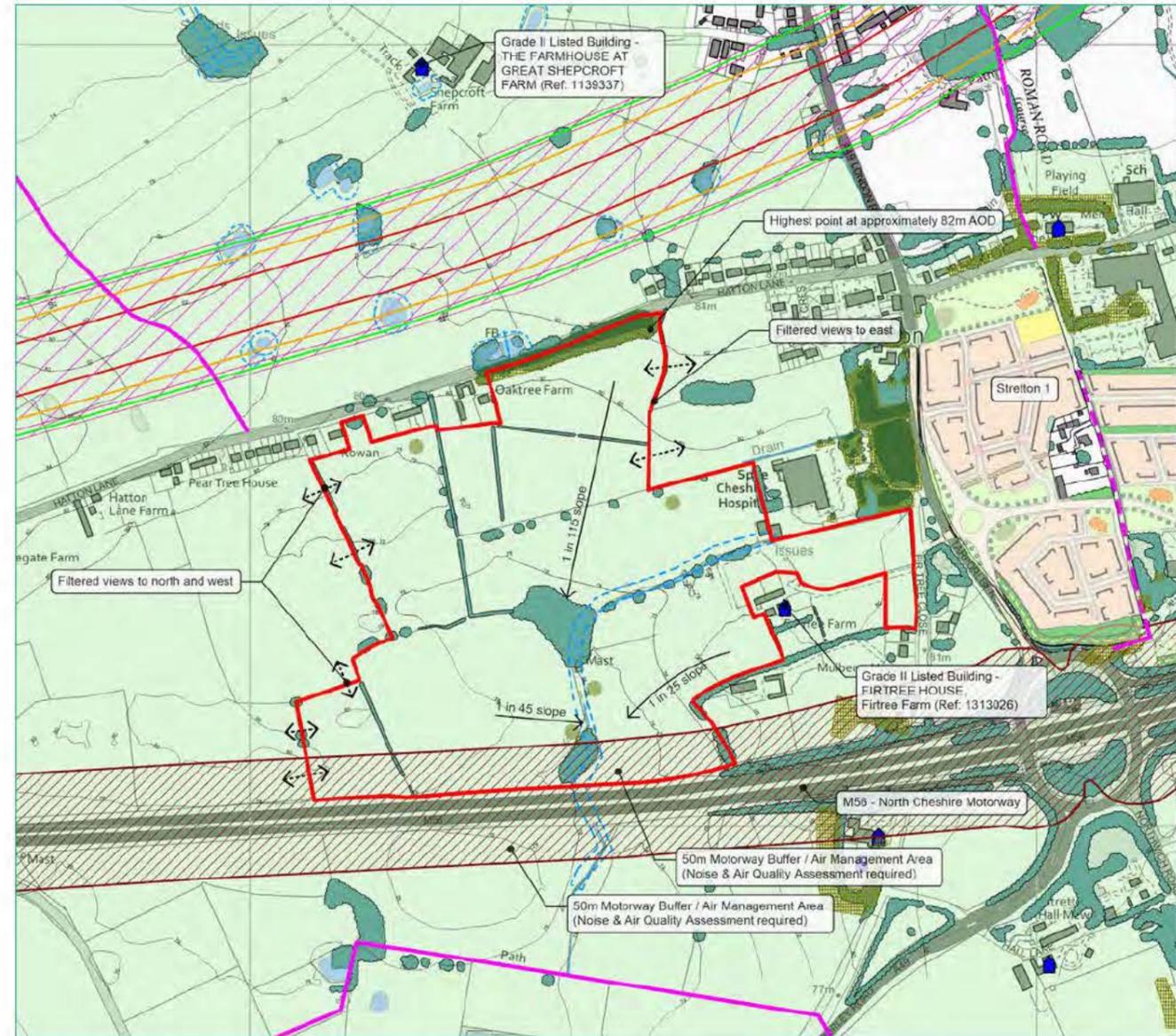
- 7.1 If Land South of Hatton Lane is safeguarded then its release for future development is dependent on the Council maintain its 5 year effective housing land supply. Only when defined triggers are reached, would a partial review of the Local Plan be required.

### 8. INFRASTRUCTURE | CAPACITY & REQUIREMENTS

- 8.1 Traffic impact assessment work undertaken in support of a planning application for residential development on HCA land, located to the north of Stretton Road, has confirmed

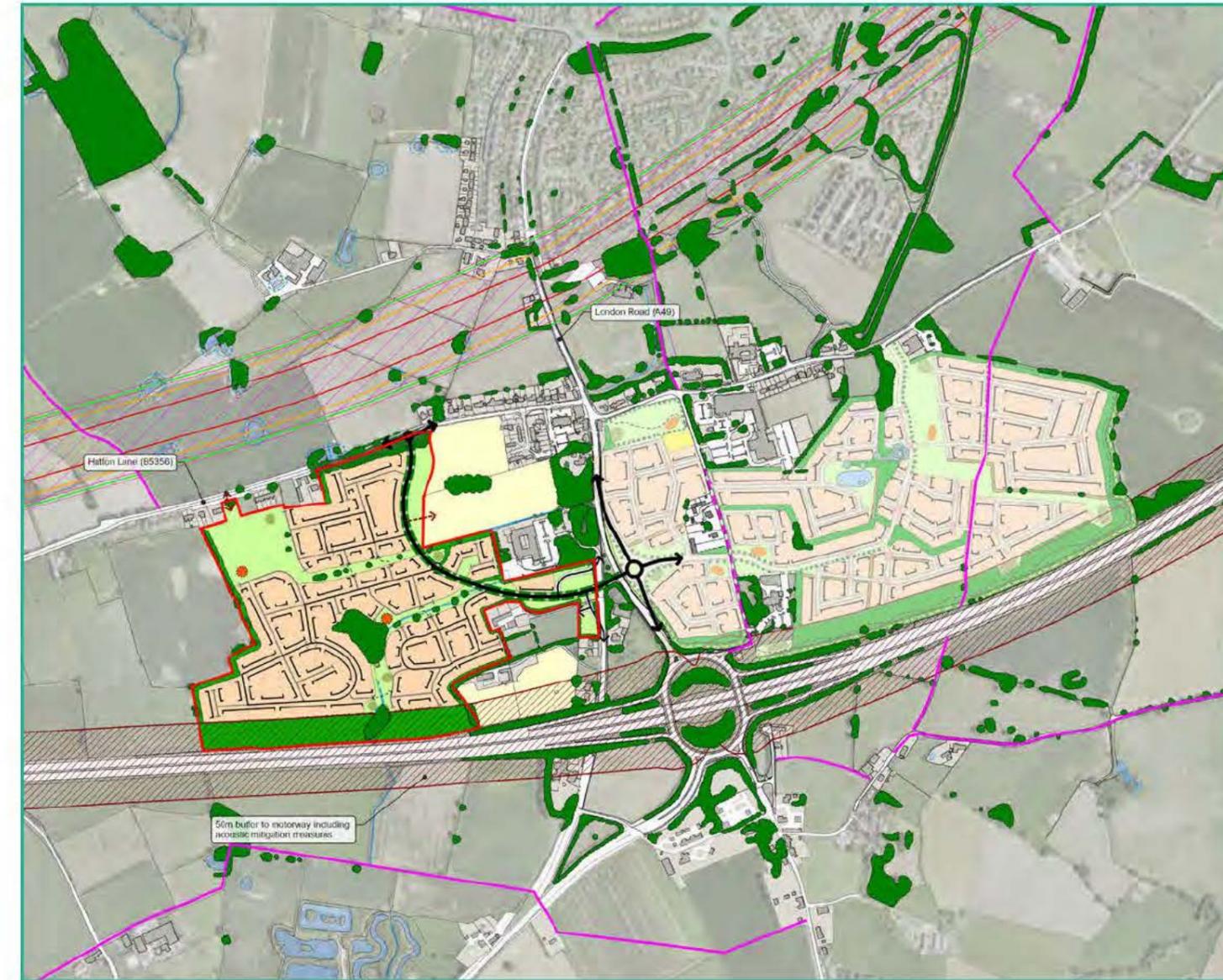
that the A49 London Road / Stretton Road / Hatton Lane signal-controlled junction (the Cat & Lion junction) is experiencing capacity constraints during the weekday peak hours.

- 8.2 The development of Land South of Hatton Lane delivers a distributor road through the site (acting as a local by-pass) which will improve the local highway network by reducing use of the A49 / Stretton Road/Hatton Lane signalised junction as it provides through traffic relief. Enhanced amenity and environmental benefits for existing residents within Stretton would also be realised.



- Site boundary
- Stretton 1
- Green Belt
- Existing trees
- Public Right of Way
- Tree Preservation Order (TPO)
- Existing waterbody
- Environmental Agency existing waterbody 8m buffer - size to be confirmed
- 80m pipeline offset (Shell / HSE Consultation Zone)
- Pipelines Inner Zones Feb16 - housing development not permitted
- Pipelines Middle Zones Feb16 - housing development restricted
- Pipelines Outer Zones Feb16 - housing development permitted
- 50m buffer and Air Quality Management Area (AQMA) to motorway
- Grade II Listed Building
- Direction of slope
- ↔ Filtered views
- Potential location for SuDS measures size and location to be determined by engineer
- Existing contours - 2m intervals

Figure 6. Site Opportunities & Constraints Plan



- Site boundary - 26.96 ha / 66.62 ac
- Potential developable area - 16.04 ha / 39.65 ac
- Potential future residential development - 6.11 ha / 15.09 ac
- Stretton 1
- Potential amenity open space
- Existing trees
- Potential tree planting
- Proposed tree line
- Potential location for SuDS
- Existing waterbody
- Environment Agency existing waterbody 8m buffer
- ↔ Proposed link road
- Primary street
- Neighbourhood street
- Lane
- ↔ Pedestrian connection
- Primary node
- Secondary node
- Frontage
- Potential location for equipped play area
- ↔ Potential future connection
- Public Right of Way
- 50m motorway buffer
- Tree Preservation Order
- 80m pipeline offset (Shell / HSE Consultation Zone)
- Pipelines Inner Zones Feb16 - HSE 'advise against' housing development
- Pipelines Middle Zones Feb16 - HSE 'don't advise against' housing development, but subject to restrictions (see below\*)
- Pipelines Outer Zones Feb16 - HSE 'don't advise against' housing development (Non housing uses subject to restrictions)

Figure 7. Indicative Development Framework

## Conclusion

- 9.0 Wallace is supportive of the reuse of brownfield land across Warrington. In its experience, brownfield sites prove complex to deliver and in terms of lead-in, take longer than anticipated when compared to greenfield sites. The Council's reliance on a development strategy delivering the scale of housing trajectory from brownfield sites in the early part of the Plan Period has the potential to undermine the long-term performance of the Local Plan to meet its annual housing requirements.
- 9.1 Wallace therefore recommends that the Local Plan should establish the longer-term permanence of its Green Belt boundaries by providing Safeguarded Land.
- 9.2 As such, it is recommended that the Council re-introduces its safeguarding approach, identifying the triggers it wishes to adopt to release these sites pending its ongoing effective housing land performance.
- 9.3 The Council should safeguard a number of key sites including Land South of Hatton Lane, Stretton for this purpose. The site does not contribute meaningfully to the Green Belt and is suitable for future development. Land South of Hatton Lane, Stretton provides a standalone development proposal for around 500 homes with suitable Green Belt boundaries.
- 9.4 This NPPF recommended approach will provide the necessary flexibility should completions from brownfield sites in urban areas become unavailable, unsuitable, unachievable or undeliverable.

**This document was prepared by Icen Projects on behalf of Wallace Land Investments**

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