



# WARRINGTON PROPOSED SUBMISSION VERSION LOCAL PLAN 2017-2037 CONSULTATION

REPRESENTATION BY TAYLOR WIMPEY (UK) LTD

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## 1. INTRODUCTION

1.1 Pegasus Group are instructed by Taylor Wimpey (UK) Ltd to make representation to the Warrington Proposed Submission Version Local Plan 2017-2037 consultation, which ran between 15 April and 17 June 2019.

1.2 This document provides comments on the plan and relevant evidence base documents. The structure of these representations takes the following form:

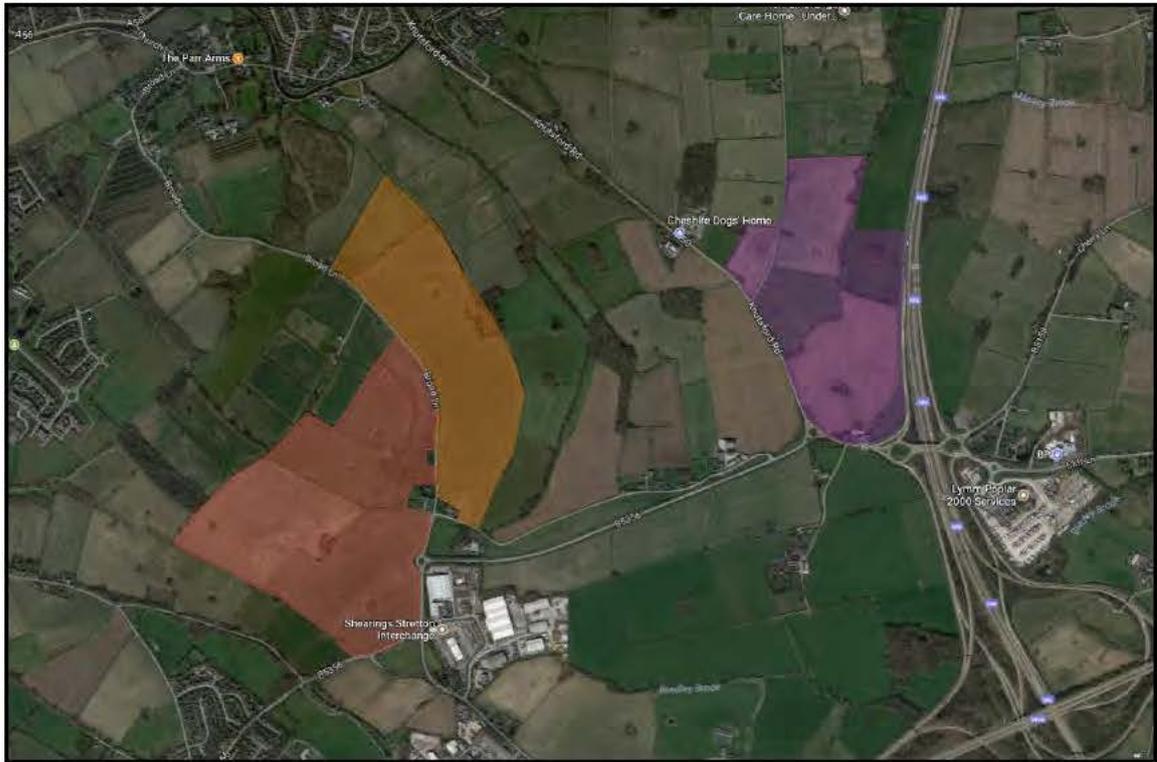
- Section 2 comments on the main legal requirements of the Local Plan;
- Section 3 comments on plan chapter 3 (Vision and Spatial Strategy);
- Section 4 comments on plan chapters 4, 5, 6, 7, 8 and 9 (Strategic Planning Policies);
- Section 5 comments on plan chapter 10 (Main Development Areas and Site Allocations) focusing on Policy MD2 – Warrington Garden Suburb;
- Section 6 comments on plan chapter 11 (Monitoring and Review),
- Section 7 summarises and concludes the representation.

1.3 **These representations relate to land located within and adjacent to the Council's proposal for a new Garden Suburb located to the southeast of Warrington.** Taylor Wimpey support this proposed allocation in principle but make detailed comments on the associated Policy MD2 and other policies within the Local Plan.

1.4 **Taylor Wimpey's land holding includes the site of the proposed 'Neighbourhood Centre', part Village C and part of the Employment Area north of junction 20 of the M6.** Figure 1 on the following page **shows Taylor Wimpey's land interest.** As per our representations to the Regulation 18 consultation Local Plan, we have confirmed all parcels of land controlled by Taylor Wimpey are available, suitable and deliverable. For ease of reference, we have included our comments to the Regulation 18 Local Plan at Appendix 1, which provides more details on the land parcels in question and highlights issues we had at the time.

1.5 Since these submissions, we are pleased to report that much advancement has been made by the Council and amongst the respective landowners for the Garden Suburb proposal and we are pleased to be working alongside other parties and the Council to ensure the site is delivered in a sustainable and coherent manner. Indeed, Taylor Wimpey are included within a working group of landowners, developers and housebuilders within the Garden Suburb whose common aim it is to progress the allocation of the Garden Suburb through to adoption of the Local Plan. That said, we do still raise some comments in relation to Policy MD2 and put forward suggestions as to how it could be improved through the examination of the Local Plan and subsequent Supplementary Planning Document process that will apply to the Garden Suburb site.

**Figure 1 – Taylor Wimpey’s Land Interests**



## 2. LEGAL REQUIREMENTS

2.1 Within this section we cover the main legal requirements in relation to the preparation of a Local Plan including:

- The Duty to Co-operate with surrounding Local Authorities and other bodies;
- The need to **effectively consult on the Local Plan and accordance with the Council's** Statement of Community Involvement; and,
- The need to ensure the Local Plan seeks to reduce the threat of climate change and delivers Sustainable Development (informed through the preparation of a Sustainability Assessment and Habitat Regulations Assessment), as defined by national policy and guidance.

2.2 Ultimately, we consider the Council have passed these legal requirements insofar as they represent an ongoing, iterative process.

### Duty to Co-operate

2.3 It would appear that the Council have undertaken the necessary requirements under the Duty to Co-operate obligations with neighbouring Local Authorities. However, as noted above, this is an ongoing duty and will need to be reviewed following the Regulation 19 consultation. We therefore reserve our right to take a seat at the examination table on this matter subject to how certain matters progress in relation to neighbouring Local Plans in terms of:

- a) The planned delivery for new required homes across the Mid-Mersey Housing Market Area; and,
- b) The planned review of Green Belt boundaries within the Halton Local Plan with particular reference to the settlement of Moore and its relationship with the South West Extension in Warrington.

### *Housing Needs*

2.4 Warrington is located within the Mid-Mersey Housing Market Area which also includes Halton and St Helens, which have all had their housing requirements informed by the Mid-Mersey Strategic Housing Market Assessment. At paragraph 4.2 of **the Council's Draft Statement of Common Ground (SOCG)**, dated July 2018, it is recognised that:

*'Other authorities in the Mid-Mersey HMA are also progressing with the preparation of their Local Plans and together, it was agreed that each authority will either meet or exceed its objectively assessed need for housing within its boundary. It is however acknowledged that the Local Plans are currently in the early stages; therefore, the authorities will keep housing need under review and address any issues arising in the future through Duty to Co-operate discussions.'*

- 2.5 Paragraph 4.3 notes that all three authorities will be meeting their own housing needs, but this will need to be carefully monitored going forward, as recognised by the Draft SOCG.
- 2.6 Critically, all three Local Plans are at a very similar stage and following similar timescales, with St Helens' Regulation 19 Local Plan Submission Draft consultation closing on 13<sup>th</sup> May 2019 and **Halton's Regulation 19** Proposed Submission Draft consultation due to start in mid-June 2019. As such, this could raise questions as to why a joint plan was not prepared. However, we understand that Warrington covers a range of geographies, not least it is part of the Cheshire and Warrington Local Enterprise Partnership and Warrington and St Helens now form part of the Liverpool City Region, which will ultimately see the production of a Mayoral Strategic Plan. As such, we endorse the production of three separate plans in this instance but agree that there will be a continuous need to monitor and review the process, particularly in the event that any one authority is unable to meet its own development needs.

*Green Belt Review around Halton/SW Warrington*

- 2.7 Another particular point we wish to highlight relates to the matter at paragraph 4.12 **Council's Draft** SOCG, which states:

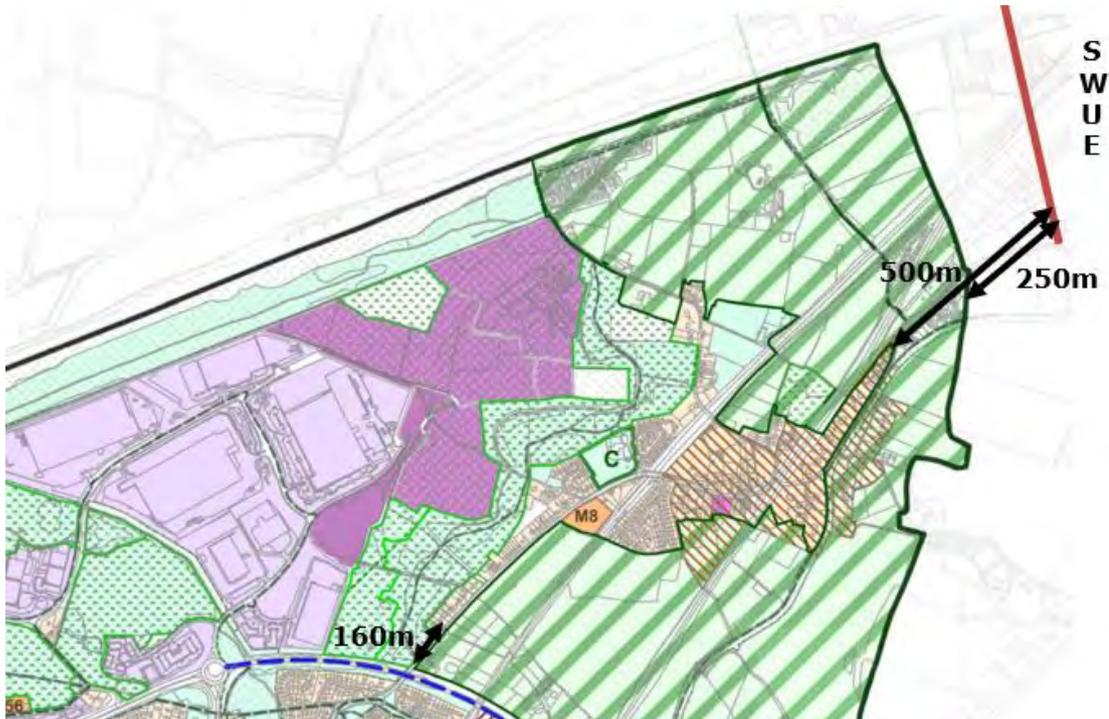
*'During the Duty to Co-operate discussions, it also became clear that both WBC and Halton Borough Council are proposing adjacent Green Belt release for development which may compromise the function of the Green Belt. In Warrington's case, this is in relation to the South West Urban Extension (proposed Green Belt release for around 1,800 homes) which is situated adjacent to the Green Belt land in Halton proposed for Green Belt release. Therefore, there is a requirement for Halton Borough Council and WBC to ensure appropriate separation between the proposed Green Belt releases adjacent to the boundary between the two boroughs. WBC will continue to work with Halton Borough Council to resolve this matter as it progresses on with its Local Plan Review.'*

- 2.8 At the time, both authorities had promoted land to be removed from the Green Belt through Regulation 18 Local Plan documents in an area south of the Manchester Ship Canal around the existing village of Moore in Halton and High Walton in Warrington i.e. the South West Urban Extension (SWUE). Both plans sought to include new development sites within these areas. The combined impact would have effectively been the merger of the main urban areas of Warrington and Runcorn, Halton.
- 2.9 On 22<sup>nd</sup> **March 2019, Halton Council's planning policy officers presented their** Regulation 19 Proposed Submission Draft to members of the Cabinet. This version omitted the originally proposed strategic Green Belt release sites around the village of Moore to accommodate new development, meaning the above issue is not quite a problematic as it was before. However, the issue still remains for the following reasons.
- 2.10 Firstly, the Halton Local Plan has still yet to be formally released for Regulation 19 consultation and even if submitted in its current form it could change again in the future. As such, at the very least

it is a matter that will require continued careful and considered monitoring as both Local Plans progress.

- 2.11 Secondly, the SWUE boundary extends to the practical limits of **Warrington's jurisdiction boundary**. Beyond that boundary is an existing settlement – the village of Moore, where Warrington have no direct control over development coming forward.
- 2.12 Thirdly, the distance between the SWUE's **western boundary (defined by Bellhouse Lane)** and existing built in Moore is less than 250 metres running along Runcorn Road. This compares to the exiting width of Green Belt between Warrington and Runcorn which is approximately 4km in this location.
- 2.13 Fourthly, notwithstanding **Halton's** deletion of their strategic allocations around Moore, their Proposed Submission Draft still seeks to remove the existing settlement of Moore from the Green Belt. This is a perfectly appropriate response to a key change in national Green Belt policy which came in with the 2012 and 2019 NPPF (now paragraph 140), which effectively states that existing villages washed over by the Green Belt should be inset instead, which differs from the PPG2 guidance which was in force when the existing Halton UDP and Core Strategy was adopted. Indeed, the settlement of Moore is of a sufficient scale and form that requires Halton Council to consider if it should be omitted from the Green Belt when considering paragraphs 139(b) and 140 of the NPPF. Halton have correctly decided to omit the urban area of Moore from the Green Belt on the basis that it is an area of land that does not contribute the main purposes of Green Belt. Indeed, it is entirely developed and not open in character.
- 2.14 The precise settlement boundary for Moore has yet to be formally examined or adopted. However, the draft proposals map available from Halton shows that it includes existing properties and a convenience store located to the west of Runcorn Road and east of the railway line but does not include existing homes located on the south of Runcorn Road and the Cheshire Ring Canal. We could see this boundary alter during the Halton Local Plan submission or examination process on the basis that we can see no reason to omit these existing properties when considering paragraph 139(b) of the NPPF. This would result in the existing and defined settlement edge of the village being pushed closer to the SWUE boundary. This is then subsequently compounded by the fact that the existing gap between Moore and Runcorn is even narrower as illustrated on the annotated extract of the proposed Regulation 19 Halton Local Plan proposals Map at Figure 2.1.

Figure 3.1 – Halton Local Plan Proposals Map (proposed Regulation 19 version)



2.15 Finally, it is recognised that minor Green Belt gaps in both directions would continue to exist. However, we cannot rule out at this stage that some parties and landowners might reasonably object to the omission of any new development sites around Moore, particularly given the fact that such sites were included in the Regulation 18 draft of the Local Plan.

2.16 With that in mind, we re-iterate the point that it is an issue that has been highlighted in the Draft SOCG and it is one that continues to require careful monitoring and consideration as both Local Plans progresses, principally because it has significant ramifications for one of the primary purposes of Green Belt: i.e. to prevent neighbouring towns from merging into one another.

#### Community Consultation

2.17 **We have reviewed the Council’s Statement of Community Engagement. We are comfortable that the Council have carried out the necessary consultation associated with the preparation of the Local Plan up to this current stage.**

#### Sustainability Assessment

2.18 **We have reviewed the Council’s Sustainability Assessment and are broadly comfortable with its structure, objectives and assessment of reasonable alternatives. However, we make some general comments below.**

2.19 The following spatial strategy option were considered in the appraisal:

- Option 1 - Garden Suburb to the south east of the Warrington of around 4,200 homes & urban extension to the south west of around 1,600 homes;
- Option 2 - Garden Suburb of around 4,200 homes & an urban extension to the west of Warrington of around 1,600 homes;
- Option 3 - Garden Suburb of around 4,200 homes & an urban extension to the north of around 1,600 homes;
- Option 4 – Garden Suburb of around 4,200 homes & dispersed Green Belt release adjacent to main urban area;
- Option 5 – Garden Suburb of around 2,400 homes, urban extension to the south west of around 1,600 homes and dispersed Green Belt release adjacent to main urban area; and
- Option 6 - A more dispersed pattern of Green Belt release adjacent to the main urban area.

2.20 The Councils preferred approach and the one being taken forward in the plan, is broadly in-line with Option 1.

2.21 The Council concluded, and we generally agree, that this option is capable of meeting development needs and deliver infrastructure needed to support the development itself and contribute to the wider sustainable development of Warrington as a whole. Green Belt release can be facilitated **without comprising the strategic importance of Warrington’s Green Belt** as a whole, with revised boundaries likely to be robust and durable beyond the plan period.

2.22 However, we note that the one area where Option 1 does not perform as well as the others is in respect of providing early housing delivery. The Council recognises that housing delivery from the Garden Suburb and South West Extension is unlikely within the early years of the Local Plan period, given the lead in times for required infrastructure to support the two urban extensions. Indeed, this is the justification for the stepped housing trajectory.

2.23 Whilst it is recognised that the stepped housing trajectory is linked to the anticipated lead in times of the urban extensions, which Taylor Wimpey support in terms of their allocation, it would also be prudent for the Council to assess (through the SA) a reasonable alternative that considered options to delivery additional sites to allow for a more even trajectory over the plan period.

3. VISION AND SPATIAL STRATEGY (PLAN CHAPTER 3)

3.1 **Chapter 3 of the plan sets out the vision and objectives for Warrington’s future development and details how they will be achieved through the spatial strategy. This chapter also sets out the exceptional circumstances to justify the release of some of Warrington’s Green Belt land to meet its development needs.**

3.2 Paragraph 3.3.7 of the plan states:

***‘The existing urban area can accommodate around 13,700 new homes. This means there is still the requirement to provide land for around 7,000 homes through release of Green Belt land. The detailed land requirement calculation is set out in Policy DEV1’.***

3.3 The Council accept that Green Belt release is required **to meet Warrington’s own** future development needs and the extent of those needs coupled with the economic and social consequences/impacts of not meeting them in full provide ‘exceptional circumstance’ **that warrant** Green Belt release within the Borough.

3.4 Taylor Wimpey support the release of land from the Green Belt for the Garden Suburb to meet the **Borough’s** housing requirements and to provide a long term strategy for meeting a range of housing needs. Indeed, as the principal settlement within the Borough, Warrington should be the main focus for development as it contains a wide range of existing services and facilities and therefore development within it and around it, can be regarded as being sustainable.

3.5 The Garden Suburb area is also the most appropriate location for a large, strategic allocation given the physical and geographical characteristics of Warrington. The M56 and M6 make for very robust Green Belt boundaries and the release of these strategic parcels of Green Belt are by far the most appropriate for release when considering the five purposes of Green Belt, as evidenced by the Council and reviewed by Pegasus Group in detail without our report at Appendix 2.

3.6 Taylor Wimpey also support the delivery of new homes in a number of the larger villages to provide choice and a reasonable geographical spread of new homes.

3.7 The only criticisms Taylor Wimpey have in regard to the Local Plan strategy/vision is:

- The suggested extent and reliance of the main urban area of Warrington. At a suggested capacity of 13,726, we consider this to be too optimistic having carried out a detailed analysis of **the site’s being suggested by the Council (see Section 4)**;
- No reserve sites identified within the Local Plan to provide for flexibility; and,
- Very limited safeguarded land provided within the Local Plan (which is all in one location), that could also offer flexibility and longer term options for growth around Warrington.

- 3.8 With regard to the first point, if it is demonstrated that the Council have been too optimistic in terms of the amount of capacity within the existing urban area, additional sites (including suitable Green Belt sites) will need to be considered.
- 3.9 With regard to the second point, we simply wish to highlight that there is substantial reliance within the Local Plan on a few very large strategic sites around Warrington (and a heavy reliance on the urban area). As such, there is an inherent risk/threat within the Local Plan. Indeed, if any one of the strategic areas for growth do not come forward or do not progress as quickly as first envisaged, the Local Plan is unlikely to deliver the necessary housing requirements. We therefore suggest, that one or two additional reserve sites are identified to temper this risk.
- 3.10 With regard to the third point, Taylor Wimpey recognise that the Garden Suburb site will deliver some homes beyond the plan period and **this is the Council's rationale for** not identifying any substantial areas of safeguarded land, and that which has been identified is limited to a small area within the Garden Suburb. We support the need to release the vast majority of the land associated with the Garden Suburb area now to allow for a comprehensive and sustainable suburb with necessary physical and social infrastructure to be masterplanned and brought forward. However, this should not obviate the Council from identifying other suitable locations around Warrington that could be safeguarded for future development. Indeed, there will be a need to provide for some longer term understanding of how Warrington could grow in other locations to ensure a reasonable market spread of homes in the future.

4. STRATEGIC PLANNING POLICIES (PLAN CHAPTERS 4, 5, 6, 7, 8 AND 9)

4.1 These chapters include all the policies for the Borough set against six identified objectives including policies for housing and employment growth, the Green Belt, the Town Centre, delivery of infrastructure, design and character and the environment.

Policy DEV1 – Housing Delivery

*Housing Requirement*

4.2 The plan identifies that a minimum of 18,900 new homes will be delivered over the 20 year plan period from 2017 to 2037, which equates to 945 homes per annum. We note that the number of homes to be delivered is based on the growth strategy set out in the Cheshire & Warrington Local Enterprise Partnership's Strategic Economic Plan and reflects the Council's growth aspirations set out in the Warrington Means Business Regeneration Programme.

4.3 Whilst the 945 homes per annum figure exceeds the minimum local housing requirement (the standard methodology) by 4%, it marks an 18% decrease from the Preferred Development Options which set a housing requirement of 1,113 homes per annum. The latter was based on the jobs growth target set out in the LEP Devolution Deal, which was considered achievable given **Warrington and the wider LEP's strategic position between the two major City Regions of Manchester and Liverpool.**

4.4 Taylor Wimpey would support any proposals to increase the housing requirement to that set out in the Preferred Development Options version of the Local Plan, and whilst we accept that it might not be strictly necessary to deem the Local Plan sound, our analysis of the available economic evidence (see Appendix 3) suggests that an additional uplift for employment growth is justified in this instance, in line with the national guidance as set out below.

National Guidance on Housing Need

4.1 Paragraph 60 of the 2019 NPPF confirms that local plan submitted after 24th January 2019 should use the Governments Standard Method for calculating housing need unless exceptional circumstances justify an alternative approach.

4.2 However, Paragraph 11 also confirms that for plan-making, the presumption in favour of sustainable development means that:

- Plan should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
- Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...

4.3 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. Many other considerations can impact on the final housing requirement figure set out in a Local Plan and this is evident within several paragraphs of the NPPG, including:

- 2a-002-20190220 - The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement.
- 2a-003-20190220 - The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination (but noting the above that must be an alternative to the minimum).
- 2a-024-20190220 - The total need for affordable housing will need to be converted into **annual flows...An increase in the total housing figure included in the plan may need to be considered** where it could help deliver the required number of affordable homes.

4.4 Under the question **'When might it be appropriate to plan for a higher housing need figure than the standard method indicates?'** the NPPG states the following (para 2a-010-20190220):

*"The standard method...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*

*This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a **higher level of need than the standard model suggests.**"*

4.5 Paragraph 2a-015-20190220 provides some useful clarification on how this 'exceptional circumstances' test will be applied at examination, confirming the logical assumption that

exceptional circumstances are only required to justify a figure that's lower than the standard method:

*"Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.*

*Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. **This will be tested at examination.**"*

- 4.6 Whilst Warrington are proposing an approach that exceeds the minimum requirement (by 4%), it is our view that **this doesn't adequately reflect current and future demographic trends, and as such** a greater uplift is required, more in line with that proposed in the previous version of the plan and the adopted Core Strategy (1,113 dpa), for the reasons set out below.

#### Employment Trends in Warrington

- 4.7 Our analysis of wider demographic and economic trends in Warrington drew the following conclusions:
- **Warrington's labour market has performed well over the last 20 years. Even over the period 2009-15, which was badly impacted by the country emerging from the economic downturn, job numbers still grew by an average of almost 1,200 per annum. The Housing Needs Assessment (HNA) questions how realistic it is to extrapolate growth, however the strength of Warrington's past performance** raises the question of whether the 954 jobs p.a. growth used to calculate the housing target of 945 dpa is ambitious enough.
  - Warrington is part of one of the strongest performing areas of the economy – the Cheshire & Warrington LEP. The LEP is currently in the process of developing its Local Industrial Strategy (LIS) and part of the evidence base for the LIS outlines the aim of seeing the area become a £50billion economy by 2040. The LIS evidence base also highlights the strong performance of the LEP since 1998 in terms of growth in economic output. It seems reasonable to assume that this growth will need to continue if the area is to become a £50billion economy, which will require significant levels of employment to be created in the **LPE's three constituent** districts: Cheshire East; Cheshire West & Chester; and Warrington. Having a housing target based on future jobs growth which is well below increases seen over the last 20 years therefore seems relatively unambitious.
  - In economic terms, it would be sensible to use the annual jobs growth figure of 1,240 outlined in the 2017 SHMA as a starting point for calculating future housing need in Warrington.

4.8 Whilst we acknowledge that a housing target required to meet a jobs growth target of above could be compounded by wider market and deliverability issues in Warrington (noting that they are far greater than levels of delivery previously achieved in the Borough), this does indicate that the proposed figure of 945 dwellings per annum is likely to fall short of any economic led projections and associated housing requirement.

4.9 In light of the above point and previous plans suggesting a higher rate would be achievable, the proposed housing requirement should either be increased, or at the very least viewed as a minimum, with flexibility built in to allow higher levels of sustainable growth as required.

#### *Housing Distribution*

4.10 It is necessary to include 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.

4.11 The plan says at paragraph 4.1.10 that the Council has used a benchmark of 10% which it considers **provides sufficient flexibility in the context of the plan's proposed housing land supply and Taylor Wimpey fully support this 10% flexibility factor**. This brings the total housing requirement to 20,790 homes as set out in Table 1 of the plan.

4.12 The plan sets out how the housing requirement is to be achieved during the plan period though:

- A minimum of 13,726 homes from the main urban area of Warrington;
- A minimum of 5,832 homes from two large urban extensions; and,
- A minimum of 1,085 homes from allocated sites at settlements which lie outside the main urban area.

4.13 The first things we would like to point out is that the Council have identified land for 20,646 homes which incorporates a flexibility of 9% and not 10% as claimed.

4.14 That said, Taylor Wimpey fully support the principle of maximising development in existing urban areas, as a means of promoting sustainable growth. The spatial distribution of housing should follow a logical hierarchy which provides an appropriate pattern of development and supports sustainable development. However, there are serious concerns about the heavy reliance on the main urban area to achieve 67% of the housing requirement. We address this in greater detail below.

4.15 Furthermore, the housing distribution set out above results in their being a lack of housing development land on the periphery of the main urban area, especially for medium-sized development to the west of the Borough.

#### *Main Urban Area of Warrington*

4.16 The 13,726 homes are explained in the 2019 Urban Capacity Assessment, where it is broken down as:

- 9,226 homes identified through the SHLAA including small sites allowance (2018 to 2033);
- 210 homes identified through the SHLAA at Peel Hall (2033 to 2037);
- 304 homes from small site allowance (2033 to 2037);
- 6,549 homes from town centre and waterfront masterplanning work;
- 359 homes from completions during 2017/2018; and
- -2,919 to avoid double counting between the SHLAA and town centre masterplanning work.

4.17 For the reasons set out below, we raise serious questions over the timescales and deliverability of all of the 13,726 homes in the main urban area during the plan period.

4.18 We do this with reference to the latest deliverability guidance set out within the glossary of the 2019 NPPF:

*"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

*Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged".*

*SHLAA Sites and Small Sites Allowance (2018 to 2033)*

4.19 The 9,226 homes identified through the SHLAA including small sites allowance (2018 to 2033) is explained in the SHLAA, where it is broken down as follows:

- 8,086 homes from large sites; and
- 1,140 homes from small sites (76 dpa).

4.20 The SHLAA goes on to break down the 8,086 supply as follows:

- 3,568 homes from large sites with planning permission

- 4,518 homes from large sites without planning permission

4.21 Firstly, it should be noted that 1,398 homes of the 8,086 homes identified from large sites (or 17%) is on land which is not being promoted by the landowner, casting doubt on whether they wish to develop their land and therefore on the deliverability of this element of the capacity.

4.22 Secondly, there is the element of risk with the deliverability of the large sites without planning permission. To temper the risk associated with this element of the supply we have applied a 25% reduction to sites within this category, which reduces this element of the supply to 3,388 (i.e. 1,130 less than claimed).

*Small Site Allowance (2033 to 2037)*

4.23 Whilst the 2019 NPPF acknowledges that small sites can be a realistic source of supply, paragraph 70 requires evidence not only of past delivery rates, but that such rates can continue going forward, taking account of expected future trends.

4.24 In this instance, it is considered that a flat rate across the plan period and including the last five years of the plan period, is extremely optimistic as sources of small sites are finite, and therefore the rate of windfall should naturally fall over time as more sites are picked up through the SHLAA / 'call for sites' process, or allocated for development. Furthermore, small sites are naturally and generally within the urban area which is accounted for separately in the comprehensive masterplanning exercise, which we discuss below.

4.25 In addition, **with Council's now required to produce brownfield register's each year listing all available brownfield land coupled with more permissive planning powers such as permission in principle**, it is likely that such sites will be exhausted in the next 15 years.

4.26 We seriously question whether there will be any significant windfall after 2033, given the level of planned regeneration in the first 15 years of the plan period and as such we have removed this element from the supply (i.e. 304 less homes).

*Town Centre and Waterfront Masterplanning*

4.27 The main issue we have with the overall urban capacity is the ability of the town centre and waterfront to deliver 6,549 homes. The 6,549 homes are explained in the **Council's** Trajectory, where it is broken down as:

- 4,007 homes identified in the town centre; and,
- 2,542 homes identified at the waterfront.

4.28 This capacity is **split into numerous parcels of land which are depicted on the Council's various masterplans** (Land Use Plan, Character Areas Plan and Phasing Plan). However, there is no delivery

mechanism within the plan to bring forward these homes, many of which are proposed on parcels of land that are in active use and have multiple landowners.

4.29 We have reviewed each of the town centre and waterfront parcels in detail and provide a Capacity Assessment of the associated masterplans (see Appendix 4). In headline terms our assessment identifies that:

- A large proportion of the parcels (54 of 104, or 52%) have more than one land title with some having 20 or more titles suggesting there will be land assembly issues, unless the Council is proposing some sort of large scale CPO, which has not been suggested.
- Only 2,652 of the 6,549 unit capacity (or 40%) is on sites that have been put forward for development in the SHLAA, meaning that 60% has been generated from the masterplanning exercise with little supporting evidence.
- A total of 4,540 of the 6,549 unit capacity (or 69%) is proposed on sites with at least one active occupier and these include national supermarket operators like Asda and Lidl, with no indication that these are intending to close or relocate or that their leases are due to expire.
- The masterplanned capacity of the high density dwellings is based on 140 dph, whereas both Policy TC1 of the plan and the SHLAA refer to a high density dwelling capacity of 130 dph, effectively over-inflating the capacity of the high density dwellings within the masterplanned capacity.

4.30 Whilst a claimed capacity of 6,549 homes is identified within the town centre and waterfront, our assessment identifies the developable and deliverable capacity of 4,187 homes (1,765 homes within the town centre and 2,422 homes at the waterfront) (i.e. 2,360 less than claimed). This includes the SHLAA sites, vacant (or largely vacant) sites and those with planning permission.

4.31 Within our assessment we have calculated the likely delivery of the homes from within the town centre and waterfront by applying a development risk ratio, an approach endorsed by the Knowsley Local Plan Inspector (see Appendix 5), whereby an element of risk was factored into the expected delivery of the urban capacity depending on whether sites had planning permission and the viability of those sites without permission. We have applied similar principles and calculated the risk of delivery depending on whether parcels have planning permission for residential development, whether they have been included within the SHLAA and put forward by the landowner, whether the parcels are in multiple ownerships and therefore requiring land assembly and whether they are in active and viable commercial use.

4.32 Urban capacity aside, the remainder of the housing requirement is to be achieved through urban extensions and allocated sites. We consider these below.

### Urban Extensions

- 4.33 The plan proposes two urban extensions, at Garden Suburb and South West Extension. Taylor Wimpey support the identification of the Garden Suburb proposal in particular and agree that the housing (and employment) requirement is an exceptional circumstance which justifies its removal from the Green Belt.
- 4.34 The capacity of these urban extensions is set out in the plan as follows:
- Garden Suburb – a minimum of 5,131 homes to be delivered in the plan period (including 930 homes which already have consent); and,
  - South West Extension – minimum capacity of 1,631 homes to be delivered in full in the plan period.
- 4.35 The only point we would like to make about the capacity at the Garden Suburb is that 5,131 homes are identified in the plan period in Policy DEV1, whereas Policy MD2 – Warrington Garden Suburb refers to **“around 5,100 homes” within the plan period. For consistency it would be preferable if both Policy DEV1 and Policy MD2 referred to the same figure.**
- 4.36 Regarding the delivery of the homes within the South West Extension it is noted that this is intrinsically linked to the delivery of the Warrington Western Link which is a significant piece of infrastructure. We therefore question whether homes could be delivered here from 2023/24 and whether the urban extension could be completed at the end of the plan period. It is not an unrealistic proposition that the delivery may slip by a few years meaning that the site would fail to deliver in full within the plan period. As such, we consider that the South West Extension would begin to delivery 2025/26 resulting in 116 homes being provided beyond the plan period.

### Allocated Sites

- 4.37 In general terms, Taylor Wimpey support the release of land from the Green Belt release around the settlements of Burtonwood, Croft, Culcheth, Hollins Green, Lymm and Winwick which will collectively provide around 1,085 homes on medium-sized sites ranging between 40 and 200 homes in order to provide a wider choice of homes across the Borough in a range of locations.

### Summary and Conclusions to Housing Distribution

- 4.38 To understand the **implications of the comments we have provided above we compare the Council’s** housing requirement to the supply identified in our assessment in Figure 4.1.

**Figure 4.1 – Housing Supply during Plan Period**

	<b>Council Supply Position</b>	<b>Pegasus Supply Position</b>	<b>Difference</b>
<b>Urban Capacity</b>			
SHLAA including Small Sites	9,226	8,139	-1,130
SHLAA Peel Hall	210	210	-
Small Site Allowance 2033-2037	304	0	-304
Town Centre and Waterfront Masterplanning	6,549	4,187	-2,360
Completions	359	359	-
Double Counting	-2,919	-2,919	-
<b>Urban Extensions</b>			
Garden Suburb	4,201	4,201	-
South West Extension	1,631	1,515	-116
<b>Allocated Sites</b>			
Allocated Sites	1,085	1,085	-
<b>Housing Supply Total</b>	<b>20,646</b>	<b>16,774</b>	<b>-3,872</b>
<b>Shortfall at 9% flexibility (i.e. 20,646 home requirement)</b>			
	-	-3,872	
<b>Shortfall at 10% flexibility (i.e. 20,749 home requirement)</b>			
	-144	-3,975	

- 4.39 In summary, when accounting for the need to incorporate an element of flexibility which we believe should no less than 10% to allow higher levels of sustainable growth as required, there is a **shortfall of land for 3,975 homes** to meet the minimum housing requirement set out Policy DEV1.
- 4.40 Furthermore, and as we have set out above, the proposed housing requirement should be increased, or at the very least viewed as a minimum.
- 4.41 As such, there is a requirement to identify additional capacity for housing land within the Borough. Some of this capacity could be made up within and adjacent to the Garden Suburb and the identification of additional land.

**Housing Trajectory**

- 4.42 The plan sets out the stepped housing trajectory of 847 homes per annum between 2017 to 2021 and 978 homes per annum between 2022 to 2037. We do not consider this stepped approach to be appropriate as it appears that it is being used by the Council as a way of achieving a five-year land supply position on adoption. These housing numbers represent the actual housing needs today and therefore it is unreasonable to expect people to wait until later in the plan period before their housing needs are addressed.
- 4.43 Whilst it is recognised that the stepped housing trajectory is linked to the anticipated lead in times of the urban extensions, this could be addressed through the allocation of medium-sized sites on the fringe of the main urban area.

### **Supply Beyond the Plan Period**

- 4.44 The plan in its current form does not include any significant areas of safeguarded land. Whilst the NPPF does not appear to provide any definitive guidance to indicate the amount of land which should be safeguarded, the NPPF is clear that where necessary, Local Plans should provide safeguarded land to meet longer term development needs stretching 'well beyond the plan period'. Local authorities should satisfy themselves that Green Belt boundaries 'will not need to be altered at the end of the development plan period'.
- 4.45 In addition, the plan should provide triggers which would indicate when the safeguarded land would be considered for release, through a plan review. The release of safeguarded land could be linked to a trigger if the plan is failing to deliver.

### **Housing Delivery Test**

- 4.46 The first round of Housing Delivery Test (HDT) results were issued in February 2019, which applies a standardised approach to housing delivery over the preceding 3-year period for all the Local Authorities across the country (in line with the HDT Measurement Rulebook and paragraphs 73-75 of the NPPF).
- 4.47 The resultant percentage figure is used to confirm which buffer should be applied in the five-year supply calculation (5% if delivery is above 85% and 20% if below). In addition, if delivery has dropped below 95% the Council are required to prepare an Action Plan to assess the causes of under-delivery and identify actions to increase delivery in future years. Finally, if delivery is below 25% (in the current 2018 results but increasing to 45% in 2019 and 75% in November 2020 under transitional arrangements), then the tilted balance in relation to the presumption in favour of sustainable development is engaged.
- 4.48 In the case of Warrington this suggests a figure of 55% meaning that the 20% buffer is applicable, and an action plan is not required.

*Figure 4.2 – Housing Delivery Test*

	2019 HDT completions	2019 HDT requirement	Delivery against HDT requirement
2015/2016	595	923	-328
2016/2017	492	902	-410
2017/2018	359	792	-433
TOTAL	1,446	2,617	-1,171
Average dpa/ HDT %	482	872	55%

- 4.49 As can be seen from the table, Warrington delivered 1,446 new homes over the last three years against a 'requirement' of 2,617 dwellings.

### 5 Year Housing Supply

- 4.50 The Council do not confirm their 5YHLS position within the plan, although the 2018 SHLAA and AMR do confirm the supply and requirement position at 1<sup>st</sup> April 2018, which allows an accurate calculation to be made
- 4.51 Accordingly, we set out our analysis of the Council’s 5YHLS position below, using various different scenarios for both the requirement and supply side inputs to give a range of figures.

**Figure 4.3 – Five Year Housing Land Supply**

	2017 Start Date		2014 Start Date (Historic Shortfall)	
	Stepped Target	Full Req't	Stepped target	Full Req't
Annual Requirement	847	945	847	945
5 Year Requirement	4,235	4,725	4,235	4,725
Shortfall (against target and over relevant period)	488	586	1,210	1,308
5 year requirement + shortfall	4,723	5,311	5,445	6,033
5 Year Requirement + shortfall + 20% buffer	5,668	6,373	6,534	7,240
Total Supply (including windfall)	3,555			
Total Supply (without w'fall = equiv to standard 10% lapse)	3,175			
5 Year Supply Figure with windfall	3.14	2.79	2.72	2.46
5 Year Supply Figure without windfall	2.80	2.49	2.43	2.19

- 4.52 We conclude that the Council’s supply is between **2.2 and 3.1 years** depending on whether:
- The full 945 dpa or stepped 847 dpa requirement is used;
  - The shortfall is considered over since the start of the plan period (2017), or since the beginning of the SHMA period (2014);
  - Windfall is included in the supply. In this case the windfall amount is close to 10%, which is a standard lapse rate applied to supply figures and as such forms a useful sensitivity test.
- 4.53 This combination of historic under-delivery and the 5YHLS shortfall (which it accentuates) provides further support for releasing additional sites now, on top of the Green Belt sites already proposed for allocation, to aid delivery in the first five years of the plan, and/or by facilitating earlier delivery within the Garden Suburb. Our comments towards the Garden Suburb policy are pertinent to this as it provides greater clarity, certainty and an element of flexibility should that be required to ensure early delivery is capable.

## Policy DEV2 – Meeting Housing Needs

### *Affordable Housing*

- 4.54 This policy states that residential developments of 10 or more dwellings will be required to provide 20% affordable homes on sites within inner Warrington and 20% affordable homes on greenfield sites and elsewhere. Taylor Wimpey support the need to provide affordable housing in Warrington and fully support the need to address the affordable housing requirements of the borough. The NPPF however is clear that affordable housing policies must take into account viability.
- 4.55 Paragraph 34 of the NPPF establishes the importance of viability to ensure that development identified in the Plan should not be subject to obligations which restrict their ability to deliver affordable dwellings.
- 4.56 The Local Plan Viability Assessment (March 2019) highlights issues with affordability for some of the typologies and site allocations. Section 5.1 states that:
- 'as there are typologies and areas which are shown to be unviable at these levels of affordable housing, the Council will need to operate their policy flexibly, having regard to individual site viability.'*
- 4.57 Therefore, Taylor Wimpey have concerns that this policy will lead to the non-delivery of homes in the Borough.
- 4.58 With regard to the overall affordable need, the 2019 Local Housing Needs Assessment identifies a net need of 377 dpa, which has increased by over 70% since the 2016 Mid-Mersey SHMA target of 220 dpa and 120% since the 2014 Core Strategy target of 172 dpa. This suggests that affordable delivery is not keeping pace with demand and is reflected in the 2018 AMR which notes that there were only 82 affordable completions in 2017/18 and 72 affordable completions 2016/17.
- 4.59 As such, there is a clear lack of affordable homes within the Borough and whilst affordable need is clearly increasing (by 70% between 2016 and 2019) the overall housing requirement has only increased by 12.5% (839 to 945 dpa) suggesting that the plan is not providing sufficient support for affordable housing.

### *Housing Type and Tenure*

- 4.60 This policy states that residential development should provide a mix of different housing sizes and types and should be informed by the monitoring target set out in the plan. Taylor Wimpey are generally supportive of providing a range and choice of homes to meet the needs of local people however we wish to underline the importance of a flexible and workable policy to ensure that housing delivery will not be compromised. Taylor Wimpey recommend that a flexible approach is taken with regards to the housing mix on a site which; recognises that needs and demands will vary in different locations, ensures that the scheme is viable and provides an appropriate mix for the location.

### *Optional Standards*

- 4.61 Part 9 of the policy says that residential developments of 10 or more dwellings provide 20% of homes at the M4(2) standard. Taylor Wimpey are supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible and adaptable homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.
- 4.62 **The Local Housing Needs Assessment provides the Council's evidence for this policy. Unfortunately,** this evidence is severely lacking on the majority of these elements. This lack of evidence does question how the percentages identified in the policy were derived. It is incumbent on the Council to provide a local assessment evidencing the specific case for Warrington which justifies the inclusion of optional higher standards for accessible and adaptable homes in its plan. If the Council can provide the appropriate evidence and this policy is to be included, then the Taylor Wimpey recommend that the policy should:
- Take into account site specific factors such as vulnerability to flooding, site topography and other circumstances which may make the site less suitable for M4(2) and M4(3) compliant dwellings as set out in PPG;
  - Ensure that if step-free access is not viable that M4(2) and M4(3) should not be applied; and,
  - Ensure an appropriate transitional period is included.
- 4.63 Part 10 of the policy also states that where there is an identified need the Council will also seek a proportion of wheelchair user dwellings in order to meet the overall requirement for 5% of new homes to be wheelchair accessible in accordance with standard M4(3) 'wheelchair user dwellings'. **It is not clear how this part of the policy will work, for example how will an 'identified need' be proven or not,** and what proportion of the development will need to meet the M4(3) standard to contribute to the 5% overall requirement.

### *Housing for Older People*

- 4.64 Part 11 of this policy states that residential developments of 10 or more dwellings should make provision for 20% of the homes to accommodate the needs of older people. Whilst Taylor Wimpey appreciate this flexibility in terms of the consideration of location, the nature of the area and the type of development, it is not clear what will be required for the development to meet this standard.

### Policy DEV4 – Economic Growth and Development

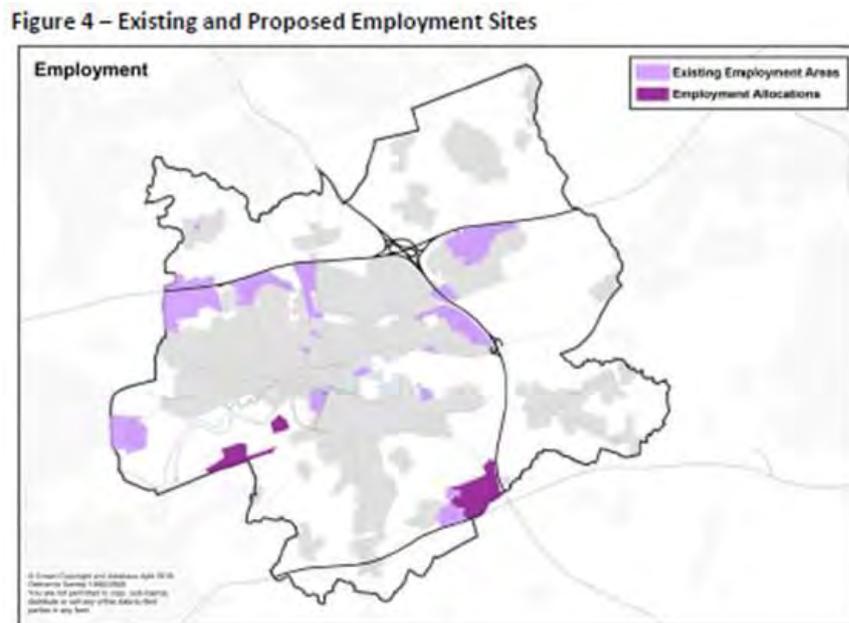
- 4.65 Taylor Wimpey fully support the Council identifying a level of employment land to meet both local and wider strategic needs, based on the aspirations of Northern Powerhouse, the Warrington Means

**Business regeneration programme, and the Cheshire and Warrington Local Enterprise Partnership's (LEP) Strategic Economic Plan (SEP).** This demonstrates an ambitious and positively prepared plan in this regard, with the potential for Warrington to attract economic investment and jobs from the wider region.

- 4.66 Clearly, this level of employment growth will need to be supported by housing growth, to provide both the quantity of housing accommodate the additional workers and the and choice of housing to attract the right range of professionals.
- 4.67 Employment land requirements are calculated at 362ha over the period 2017-37. This figure is derived from the 2019 Economic Development Needs Assessment (EDNA), undertaken by BE Group and Mickledore. The EDNA concludes that the preferred forecasting method for establishing employment land need is a projection forward of past take-up rates that considers both strategic and local needs. The EDNA also identifies future employment land need by combining forecasts produced by Oxford Economics (the baseline position) with job creation associated with the Strategic Economic Plan of the Cheshire & Warrington Local Enterprise Partnership (the policy-on position). This method results in employment growing by 954 jobs per annum in Warrington between 2017 and 2037, however paragraph 2.44 of the EDNA concludes that this employment figure translates into land requirements that significantly underestimate future employment land need.
- 4.68 The point made by the EDNA in relation to which method to use is interesting because the 2019 Local Housing Needs Assessment undertaken by GL Hearn, which identifies a dwelling requirement of 945 per annum, uses the 954 jobs per annum figure as the starting point for estimating future housing need in the District – i.e. the same jobs estimate calculated by combining the baseline Oxford Economics forecasts with the policy-on impact of the SEP. It is not possible to calculate how many jobs could be created by developing 362ha of employment land identified by the EDNA, however it seems reasonable to assume that it would generate more than 954 jobs on an annual basis up to 2037. It would therefore be sensible if further analysis was undertaken to establish the level of employment likely to be generated by the 362ha of employment land. If it emerges that annual jobs growth surpasses 954 per annum, this will have knock-on effects for housing need in Warrington.
- 4.69 Put simply, it is imperative that these economic and housing aspirations are aligned, where our economic analysis (see Appendix 3) suggest this might not be the case, with the level of housing currently proposed unlikely to fully support and realise the economic ambitions of the plan.
- 4.70 We support the flexibility built into Part 9 to allow unviable employment land to come forward for other uses, where appropriate, and suggest this should be stated to include residential development.

4.71 Figure 4 at page 52 of the plan shows the distribution of existing and proposed employment sites within the borough and demonstrates an even geographic spread, with obvious clusters around the motorway junctions, which we support.

4.72 However, as noted in Section 3, the distribution of housing sites does not reflect this focussing on the town centre and two strategic allocations to the south. In our view the Council should consider additional allocations to west of borough, which is well connected to the employment opportunities at Lingley Mere Business Park, Omega Business Park and other locations along the M6 corridor.



#### Policy DEV5 – Retail and Leisure Needs

4.73 Taylor Wimpey object to Policy DEV5 on the basis that it is not consistent with national planning policy and the approach applied to the identification of new centres is not fully justified.

4.74 With regard to the consistency point, we have previously raised the issue regarding the names of categories applied to the different groups of centres. In short, the Neighbourhood Centres should be named Local Centres and vice versa.

4.75 We recognise the names/categories given to the centres stems from the existing Core Strategy and retail evidence base. However, the categorisations and hierarchy used is confusing and not consistent with the NPPF or indeed the Local Plan's on Glossary in relation to what constitutes a defined 'Town Centre' for the purposes of considering retail policies (which replicates the NPPF's definition). The Glossary states the following for 'Town Centre':

*'Area defined on the local authority's Policies Map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary*

*shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.'*

4.76 As such, the confirmed hierarchy in the Local Plan Glossary is City, Town, District followed by Local Centres and does not extend to those of 'neighbourhood significance'. This wording is not helpful given Policy DEV5 places Warrington's 'Neighbourhood Centres' above its Local Centres and are classed as a 'Town Centre' for the purposes of applying the key main town centre tests. We consider the policy could lead to some confusion in general and particularly in relation to the role, function and purpose of newly planned centres within the Strategic Allocations. Indeed, the position is further confused by reference to 'Neighbourhood Hubs' in Part 5 of the policy.

4.77 We have prepared a supporting Retail & Town Centre Use Assessment (see Appendix 6), which confirms that the centre at the envisaged 'Neighbourhood Centre' within the Garden Suburb actually has the scope to be a District Centre without generating any undue adverse impacts on existing centres within Warrington. This is by virtue of:

- The existing expenditure and retail capacity generated within the catchment area located to the south of the Manchester Ship Canal,
- The extent of evident overtrading in existing retail facilities within the catchment area,
- The level of new expenditure that will be generated by the Garden Suburb proposals and general growth within the area; and
- The limited geographical distribution of existing centres located to the south of Warrington. Indeed, there are no major supermarkets located to the south of the Ship Canal.

4.78 Equally, we recognise that the scale of the centre and its associated retail and main town centre use provision will also be strongly influenced by market demand and that may result in the delivery of a Local/Neighbourhood Centre depending on the definition used.

4.79 In summary, a centre similar in scale to those listed as District Centres or Neighbourhood Centres under Policy DEV5 could be delivered within the Garden Suburb without generating adverse impacts. This potential should be recognised in Policy DEV5 albeit without implying any commitment to deliver one form of centre over the other.

#### Policy GB1 – Green Belt

4.80 Overall, Taylor Wimpey support the Local Plan's position on removing land from the Green Belt to meet the need for housing and employment related development and supporting uses that are required to support the growth required. However, we make some representations below where we consider there would be merit in either providing greater consistency with the NPPF and suggest

some additional evidence might be prudent prior to submitting the Local Plan to the SoS to ensure the Local Plan is robust and justified.

4.81 Under Part 1 of the policy, we note the intention to keep Green Belt boundaries consistent with those set out in the **Pre-Submission Version of the Local Plan up to 'at least 2047', which extends 10 years after the set plan period.**

4.82 It is encouraging that the Local Plan looks this far ahead with regard to their Green Belt review and we believe this is entirely consistent with the NPPF paragraph 139(e), which states that when defining Green Belt boundaries, Local Planning Authorities should be able to demonstrate that Green Belt boundaries will not need to be altered again at the end of the plan period.

4.83 We support Part 2 of the policy, which reflects a new addition to Green Belt policy introduced in the 2018/19 NPPF under paragraph 138 but the criteria could perhaps go a little further to highlight examples. For instance, the final paragraph of 138 in the NPPF states the following further to Local Authorities making the decision that Green Belt release is necessary:

*'They [the Council] should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.'*

4.84 Citing some of the points under paragraph 141 of the NPPF might also be beneficial, which states

*'Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.'*

4.85 Taylor Wimpey lend particular support to Part 3a of this policy, which confirms the land located to the southeast of Warrington will be released to deliver what is named the 'Garden Suburb'. Reference is made to Figure 5.1 but we also question whether reference should be made to the Proposals Map too (or instead of Figure 5.1, which could be addressed in the supporting text to the policy).

4.86 With regard to Parts 4 to 7 of the **Policy, the Local Plan lists 'inset settlement' and Green Belt settlements 'washed over' by the Green Belt. Those settlements washed over by the Green Belt** have been historically washed over since the Green Belt around Warrington was first defined. However, since then national policy undertook a step change with the 2012 NPPF and this has been carried forward in the 2018/19 NPPF versions. That change is set out in paragraph 140 of the current NPPF which states:

*'If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or*

*normal development management policies, and the village should be excluded from the Green Belt.'*

- 4.87 Such a requirement was not previously required, and it should be noted that Planning Policy Guidance Note 2 (relevant at the time when the original inset and washed over villages were **defined**) **only required Council's to inset those settlements which they anticipated would grow or** where they would target growth. The current national position is very different. It requires a character assessment of each village within the Green Belt to be undertaken to determine if the settlements current character contributes to the openness of the Green Belt. That requirement must also be read in conjunction with rural policies within the NPPF and paragraph 139(b) which states that when defining Green Belt boundaries, plans should **'not including land which is unnecessary to keep permanently open'**.
- 4.88 We are not aware that such an assessment has been carried out.
- 4.89 The Council are still listing the villages of Stretton and Grappenhall Village as settlements that will be washed over by Green Belt but that will not be the case in light of the Green Belt release associated with the Garden Suburb proposal. As such, the list in Part 7 need to remove settlements e) Grappenhall Village and k) Stretton as these villages will no longer be washed over by Green Belt.
- 4.90 Admittedly, the Council would not have to carry out a character assessment of these two villages in the context of the Garden Suburb proposals. However, the above points will apply to the other settlements lists (which may or may not warrant retention in the Green Belt depending on their existing character and wider proposals set out in this Local Pan). This is therefore an omission in **the Council's evidence base that needs addressing before or during the examination process.**

#### Policy TC1 – Town Centre and Surrounding Area

- 4.91 Taylor Wimpey have no specific comments to raise about this policy although we would like to reiterate the point made earlier that the masterplanned capacity of the high density dwellings at 140 dph, whereas Policy TC1 of the plan refers to a high density dwelling capacity of 130 dph.

#### Policy INF4 – Community Facilities

- 4.92 Taylor Wimpey are supportive of this policy which seeks to promote health and well-being and reduce health inequalities. It is noted that Part 1 of the policy says that such facilities should be located in defined centres and neighbourhood hubs, *where possible*. It is welcomed that the policy recognises that in certain circumstances it may not be appropriate to provide these facilities within defined centres and neighbourhood hubs and their position may be more suitable in accessible locations in close proximity to the centres.

#### Policy INF5 – Delivering Infrastructure

- 4.93 Taylor Wimpey recognise and support the need for development to contribute and/or deliver supporting infrastructure in a timely fashion.
- 4.94 One key point to note here, is that in addition to the traditional planning obligation and S106 measures listed here, there will need to be an equalisation mechanism within the strategic allocations and masterplanned areas to ensure that all landowners are adequately compensated if their land is required for lower value uses such as open space/ country park etc, to help deliver the overall masterplan. This mechanism will be critical to allowing early delivery within the allocations and as such should be a key focus for the Council and should ideally be enshrined within this policy.
- 4.95 Furthermore, in respect of part 6 of the policy, whilst we acknowledge that the NPPF now requires viability matters to be addressed at the Local Plan stage, there must be an acknowledgement that circumstances will change over time, particularly with the 20 year plan period proposed here.

#### Policy ENV7 – Renewable and Low Carbon Energy Development

- 4.96 Taylor Wimpey support Parts 1 to 3 of Policy TC1 insofar they seek to support renewable / low carbon energy infrastructure and minimise carbon emissions in new development.
- 4.97 However, Part 4 of this policy requires major residential development (11 units or more) in all locations outside of the strategic allocations to meet at least 10% of their energy needs from renewable and/or other low carbon energy source(s). Similarly, Part 6b requires strategic housing and employment allocations to meet at least 10% of their energy need from renewable and/or other low carbon energy source(s) if a decentralised energy network is not viable.
- 4.98 Whilst Taylor Wimpey support the need to minimise carbon emissions, applying a blanket requirement such as this is clearly unjustified, as the Deregulation Act (2015) included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes. On this basis, we request that this requirement be removed.

#### Policy INF1 – Sustainable Travel and Transport

- 4.99 The NPPF states that previously developed land and sites that are well-related to existing settlements should be encouraged. Within Policy INF1 point 4 says that development will not be permitted on former railway lines unless they are to re-use the area for future transport improvements.
- 4.100 A transport principle is the inclusion of plug-in charging infrastructure for electric vehicles through **development in line with the Council's** Parking Standards SPD 2015. This document states that for dwelling with an on-plot parking space an external charging point should be provided and in communal parking areas should have access to a point.

- 4.101 This is something that is supported but the Council should work the appropriate infrastructure providers to ensure a balanced and flexible energy infrastructure that has capacity to meet actual requirements as they arise in different locations, rather than imposing a blanket requirement on all developments, as this could require a massive over provision of capacity (additional substations etc) which is never properly utilised.

#### Policy INF3 – Utilities and Telecommunications

- 4.102 Developers are require to work with the council and appropriate providers to deliver the necessary **physical infrastructure and networks as “an integral part of all new developments”**. This is something that can be supported: however, this is controlled by the service providers, so is not within the direct control of housebuilders or developers. Paragraph 112 of the 2019 NPPF is clear that local planning authorities should support the expansion of electronic communication networks, however it does not seek to prevent development that does not have access to such networks. It could be suggested that the council work with the telecommunications providers instead of relying on the development industry.

#### Policy INF2 – Transport Safeguarding

- 4.103 It is noted what whilst the Ship Canal is bridged in several locations it does represent a physical barrier and the crossing points can often be congested. As such, Taylor Wimpey support the safeguarding of land for a new or replacement high-level crossing of the Manchester Ship Canal between Ackers Road, Stockton Heath and Station Road, Latchford.

#### Policy DC5 – Open Space, Outdoor Sport and Recreation Provision

- 4.104 Part 3 of the policy says that in determining the nature of new or improved provision the Council will be guided by the evidence base (Open Space Audit; Sports Facilities Strategic Needs Assessment; Playing Pitch Strategy and associated Action Plans). Taylor Wimpey support the use the evidence base to determine the requirement but it is imperative that this is kept up to date throughout the plan period.
- 4.105 The policy requires all residential development of 40 dwellings to provide for open space and equipped play provision (Part 4), outdoor recreation – playing pitches (Part 4) and indoor sport and recreation facilities (Part 7). However, the requirement may not be viable in every circumstance and a clause should be included within the policy wording for provision only where it is viable. Furthermore, the policy should clarify clearly, where through reference to an SPD, how the requirement will be calculated.

#### Other Policies

- 4.106 Insofar as they are consistent with national policy and guidance and the evidence base underpinning the local plan, and are necessary and justified in order to bring forward the housing and economic growth envisaged within the plan, Taylor Wimpey have no further comments on the following policies:

- Policy DEV3 – Gypsy & Travelling Show People Provision
- Policy INF3 – Utilities and Telecommunications
- Policy INF1 – Sustainable Travel and Transport
- Policy DC1 – **Warrington’s Places**
- Policy DC2 – Historic Environment
- Policy DC3 – Green Infrastructure
- Policy DC4 – Ecological Network
- Policy DC6 – Quality of Place
- Policy ENV1 – Waste Management
- Policy ENV2 – Flood Risk and Water Management
- Policy ENV8 – Environmental and Amenity Protection

5. MAIN DEVELOPMENT AREAS AND SITE ALLOCATIONS (CHAPTER 10)

5.1 This chapter identifies the main development areas and sites in the outlying settlements which have been allocated for development. Our comments focus on focusing on Policy MD2 – Warrington Garden Suburb.

Policy MD2 – Warrington Garden Suburb

5.2 Taylor Wimpey support Policy MD2 – Warrington Garden Suburb as it removes the land illustrated on the Proposals Map from the Green Belt for 7,400 homes, 116 ha of employment land and a **range of other compatible uses to support the 'suburb' and this is required to meet the required** housing and employment needs generated in the Borough over the plan period and beyond.

5.1 We recognise and support the fact that the Garden Suburb needs to be subject to more detailed workings to be addressed through a separate Development Framework/Supplementary Planning Document (SPD) and consultation process. The preparation, consultation and subsequent approval of the SPD referred to in Policy MD2 is a suitable way forward to meet the requirements set out in Policy MD2. The SPD will be a joint collaboration between the Council, Warrington & Co, and the landowners, developers and housebuilders necessary to deliver the proposals set out in Policy MD2.

5.2 We think the policy could be clearer in this regard as there is some confusion relating to reference to a Development Framework, Masterplans, an SPD and other frameworks/strategies. The policy **could do with being 'tidied up' in this regard. We also** object to the unreasonable length, repetitiveness and lack of consistency with other parts and policies contained within the Local Plan. Indeed, there are 69 parts to the policy with a number of the parts containing subsequent criteria. Not all parts are necessary particularly when read alongside the supporting text to this policy and other policies within the plan. It is considered the policy could be made considerably shorter with cross reference to the SPD process and other relevant Local Plan policies listed in a separate table below the policy.

5.3 On behalf of Taylor Wimpey, we have addressed each part of the policy in turn with the aim of making the policy more succinct, accurate and relevant (see Appendix 7). For clarity we have also included a tracked and clean version of the suggested policy wording within the appendix. Much of the detailed changes we suggest to the policy shall become clearer as we work with the Council and other landowners on the SPD and can easily dealt with through modifications to the Policy during the examination process. Indeed, the vast majority of our comments at Appendix 7 are put to the Council as useful points of information rather than seeking to question the soundness of the policy overall.

5.4 Crucial issues associated with the following points can also still be adequately addressed through modifications to the policy during the examination process:

- **Clarification on the policy's** impact on policies contained within made Neighbourhood Plans in the area,

- Reference to the delivery of a 'Neighbourhood Centre' (noting our objection to Policy DEV2 and the consistency of this terms with the NPPF and Local Plan glossary on what constitutes a **'retail centre'**) and the ability to delivery up to 5,000 sq m of retail floorspace without any adverse impacts;
- Clarification on the role of the SPD and **associated 'strategies' and** how that process should in turn precisely influence what is delivered on the site.

5.5 We also note that the Illustrative Development Concept for Garden Suburb at Figure 18 of the plan is only very indicative and therefore we question the need for its inclusion in the Local Plan given much detail will be progressed through the SPD for the Garden Suburb.

5.6 Whilst the Garden Suburb Development Framework prepared by AECOM on behalf of the Council provides a useful starting position on how the area might come forward for development and inform the SPD, it causes some confusion when read alongside the Policy, which also references a Development Framework. Our position is that the Development Framework and master planning process undertaken to date does need more work and refinement. Moreover, the AECOM document and is concurrent release with the Regulation 19 Local Plan cannot be regarded as a formal consultation on what might come forward as part of the SPD process. Indeed, an SPD cannot be formally consulted upon until such time that the Local Plan has been adopted.

5.7 Noting the AECOM Development Framework is not the first draft of an SPD, we are comfortable many of our concerns with this document can be addressed in due course. Nevertheless, we make the following comments on the Garden Suburb Development Framework to aid ongoing discussions with the Council:

- There needs to be greater connectivity and integration of the District/Local Centre with the villages and Village C in particular to generate local footfall;
- There is scope for a larger retail offer due to the extent of expenditure that exists in the area and will be created by the development. This has the potential scope to provide early funding for certain pieces of infrastructure;
- The Country Park is a great concept and potential asset, but its suggested extent is too vast to offer a meaningful and sensible green space that relates to the surrounding communities, raising some potential safety, surveillance and management issues;
- There is scope to integrate education provision, communal sports pitches, leisure facilities and Country Park in a more sensible and coherent manner;
- There is scope for mixed use development in District/Local Centre to create a real sense of place; and,
- There is scope to better align strategic routes through TW land to create more logical development parcels.

5.8 All of the above will be fleshed out through a master planning process that will run alongside the production of the SPD. We can confirm that Pegasus Group have been instructed to prepare a masterplan which illustrates how the central part of the site can deliver the range of uses sought by the Council. We can also confirm that we have commenced the process and will be working with the Council and neighbouring landowners to plan for the District/Local Centre and Village C, part of the strategic employment area and Country Park and a number of the key strategic links. This is an ongoing process. However, we anticipate there will be an agreed approach come the Examination of the Local Plan further to a number of meetings that have already taken place amongst the respective landowners to determine how the site and required infrastructure will be delivered in a sustainable, viable and collaborative manner as expressed in the joint letter provided at Appendix 8.

6. MONITORING AND REVIEW (CHAPTER 11)

6.1 This chapter sets out the monitoring framework for the plan.

Policy M1 – Local Plan Monitoring and Review

6.2 Taylor Wimpey support the inclusion of a policy which involves the monitoring and review of the Local Plan and highlighting actions which need to be taken if housing is not delivered however it is not considered to be sound as it is not justified or consistent with national policy. This policy states that if delivery of housing including affordable housing, in any given monitoring year falls below 100% of the annual requirement, the Council will consider implementing all or some measures to bring forward development. These measures include working with developers to remove obstacles to the delivery of sites.

6.3 Part 3 of the policy states that where total delivery of housing is less than 75% of the annual requirement for three consecutive years, this will trigger the need for consideration of a review of the plan. However, it is considered that the Council may also want to consider alternative measures such as the granting of planning permission for unallocated sites in sustainable locations.

6.4 Appendix 2 sets out the Monitoring Framework. Taylor Wimpey supports the use of appropriate targets however, we would also recommend that specific monitoring triggers are introduced to this framework. For example, in the case of the housing targets this is likely to be similar to Policy M1. This will help to ensure that action will be taken when a target is not met, and a policy needs reviewing.

## 7. SUMMARY AND CONCLUSIONS

### 7.1 Overall, we support:

- the exceptional circumstances cited by the Council to support Green Belt release for housing and employment development; and,
- the identification of the Warrington Garden Suburb and the recognition that it needs to be subject to more detailed workings to be addressed through a separate Development Framework/Supplementary Planning Document (SPD) and consultation process.

### 7.2 We object to:

- The suggested extent and reliance on urban land being delivered within the existing developed core of Warrington town Centre;
- No reserve sites identified within the Local Plan to provide for flexibility;
- Very limited safeguarded land provided within the Local Plan, that could also offer flexibility and longer term options for growth around Warrington;
- **The terminology of the 'Neighbourhood' and 'Local' Centres which are inconsistent with national planning policy;**
- The blanket approach to requiring all major residential development to meet at least 10% of their energy needs from renewable energy and / or low carbon energy source(s) without justification; and,
- The unreasonable and unnecessary length of Policy MD2 – Warrington Garden Suburb which could be much more succinct, accurate and relevant.

7.3 We conclude by noting that the Garden Suburb site could accommodate a greater level of housing development than currently set out in Policy MD2 but note that this can be addressed through the SPD and ongoing reviews of the Plan. However, thought should be given to re-introducing the land east of the A50 and north **of the proposed Employment Area. This land is within Taylor Wimpey's** control and we note that it was included as Safeguarded Land within the previous Regulation 18 version of the Local Plan. In that regard, this land must have been regarded as being suitable for development by the Council and should, at the very least be tested through the iterative Sustainability Assessment supporting the Local Plan as a suitable location for additional housing development.

APPENDIX 1 – TAYLOR WIMPEY REG 18 REPS TOWARDS GARDEN SUBURB



WARRINGTON BOROUGH COUNCIL LOCAL PLAN  
PREFERRED DEVELOPMENT OPTION REGULATION 18  
CONSULTATION

REPRESENTATION BY TAYLOR WIMPEY (UK) LTD

GARDEN SUBURB SETTLEMENT (REDDISH HALL FARM)

Date: 29<sup>th</sup> September 2017

Pegasus Reference: GL/P16-0574/R006v2

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## 1. INTRODUCTION

1.1 Pegasus Group are instructed by Taylor Wimpey (UK) Ltd to make representations to the Warrington Local Plan 'Preferred Development Option Regulation 18 Consultation', which ran between 18<sup>th</sup> July and 29<sup>th</sup> September 2017.

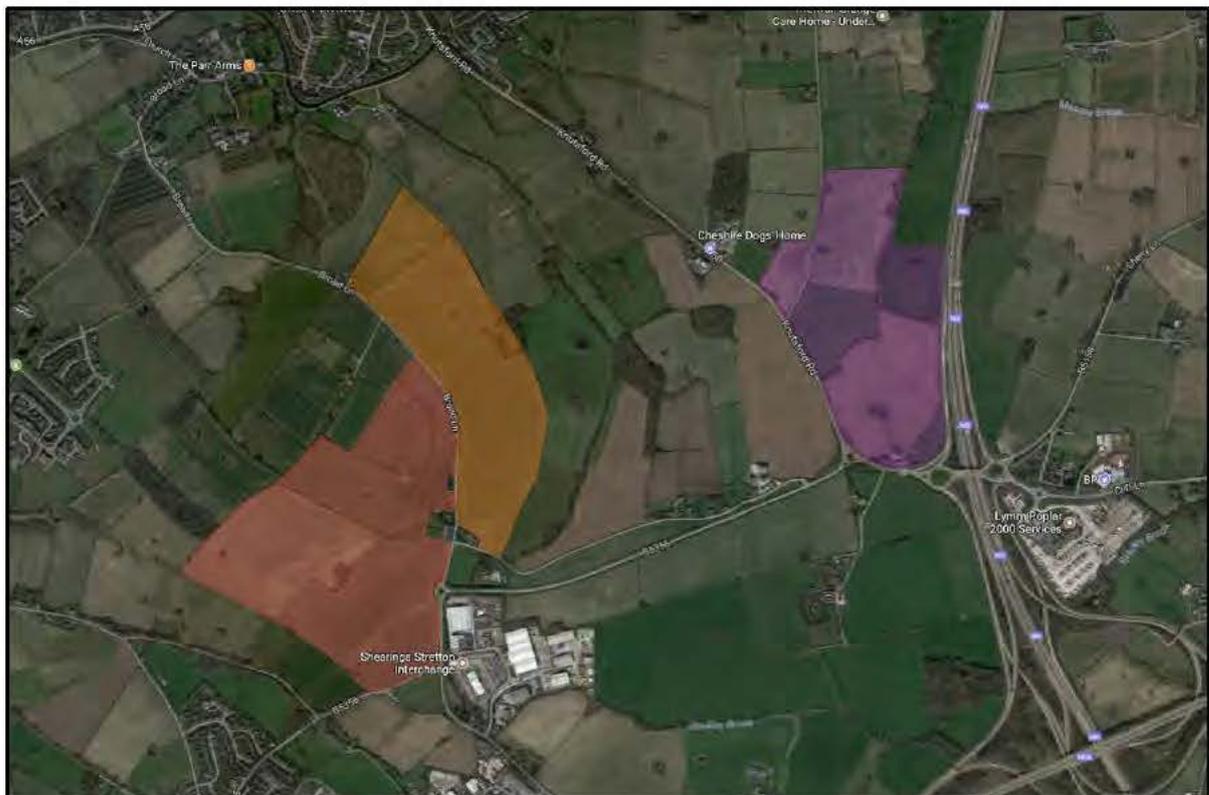
### Taylor Wimpey's Land Interest & Proposed Development

1.2 Taylor Wimpey have recently acquired a controlling interest on three separate parcels of land within the Garden Suburb Settlement (albeit all under the same freehold ownership). Figure 1.1 below depicts the three parcels:

- The Red Parcel – West of Broad Lane is approximately 118 acres (47.75 Ha);
- The Orange Parcel – East of Broad Lane is approximately 77 acres (31.16 Ha); and
- The Purple Parcel – North of Cliff Lane is approximately 93 acres (37.63 Ha).

1.3 Not all of the parcels were submitted as part of the call for sites exercise but all feature in the proposed Garden Settlement Suburb.

*Figure 1.1 – Taylor Wimpey's Promotion*



1.4 We provide further representations in a separate report, which focuses on the Regulation 18 Consultation Draft of the Warrington Local Plan. Within that document, we observe the following:

- The delivery rates for the Green Belt elements of the plan look highly ambitious and whilst there might be scope to deliver the annual targets in the latter part of the plan period, the Council will need to proactively work with land-owners and developers to ensure a vision which address the aspirations of all can be achieved.
- Sites with readily available access points should be prioritised, particularly those which will assist in opening up other land parcels that are either land locked or require new infrastructure to be in place before they can be delivered.
- The amount of Safeguarded land is not sufficient and should be disbursed across a number of sites within the Borough and within the Garden Suburb itself. Concentration in one area between Knutsford road, the M6 and Cliff Lane will not provide sufficient flexibility beyond the plan period or an equitable distribution of development.

1.5 **In time, we will provide a thorough assessment of the sites and Taylor Wimpey’s aspirations for** the land areas under their control. At this early juncture, however, we provide some general comments in relation to the indicative masterplan prepared by AECOM on behalf of the Council, build on the above points and address other relevant evidence based documents relevant to the Garden Suburb and the associated Taylor Wimpey land parcels.

## 2. CHARACTERISTICS OF TAYLOR WIMPEY LAND PARCELS

2.1 As noted in the previous section, Taylor Wimpey control three land parcels within the Garden Suburb and we address these in turn in terms of their suitability and deliverability; following the criteria set out within the AECOM Framework Document.

### RED PARCEL- West of Broad Lane

2.2 Site Location – This parcel of land is located to the west of Broad Lane and comprises 118 acres, which is currently in agricultural use. There are 4 separate fields of differing sizes, as illustrated on the aerial below. There are two large parcels to the south of the site and two smaller portions to the north of the site. Broad Lane runs along the entirety of the eastern boundary of the site. To the north, south and west of the site are open fields.

*Figure 2.1 – Land West of Broad Lane*

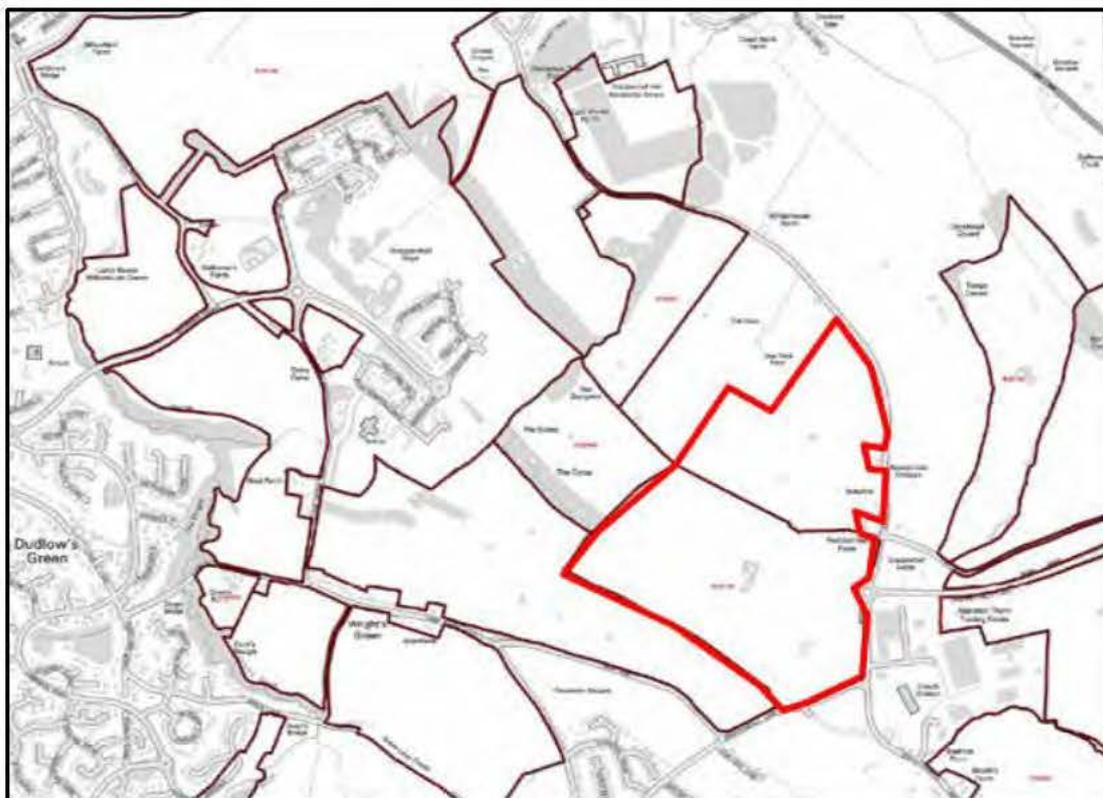


2.3 Parcel 1 measures 41 acres in size and is bound by Broad Lane to the east and the B5356 Grappenhall Lane to the south. Beyond Broad Lane to the east of the site is Applethorn Industrial Park which comprises of a number of industrial units including Cotton Club Ltd, Howley Quay Motors and Shearings Transport. The field is bound by hedgerows with some larger mature trees within this boundary. There is a small pond surrounding by trees towards the south of this field.

2.4 Parcel 2 measures 36 acres and is bound on all sides by agricultural fields. The parcel is bound by hedgerows with three small ponds surrounded by trees along the boundary with parcel 1.

- 2.5 Parcel 3 measures 24 acres and bound by agricultural fields to the north, south and west and Broad lane to the east. Along the eastern boundary, there are is a small cluster of buildings which includes office space and a small number of residential dwellings. In the north-east corner of the site, there is a cluster of 4 dwellings (two sets of semi-detached dwellings). Two of these are located within this parcel and two within parcel 4. There is a small pond surrounded by trees in the centre of the parcel with the entire parcel bound by hedgerows.
- 2.6 Parcel 4 measures 17 acres and is bound to the east and the north by Broad lane. To the west and the south, the site is bound by agricultural fields. As stated above, there are two semi-detached dwellings in the south east of the site which is part of a cluster of four dwellings. The site is bound by hedgerows with small pond surrounded by trees towards the southern boundary.
- 2.7 **Call for Sites** – Part of this site was submitted to the Call for sites Process, as shown in the extract below, Reference: R18/142. This was submitted to the Call for Sites by Pegasus Group, on behalf of Taylor Wimpey to confirm that this site is both suitable and available for residential use.

*Figure 2.2 – Call for Sites Map Extract*



- 2.8 **Landscape Character** – The wider Garden Suburb is identified as falling within National Landscape Character Area NCA 60, Mersey Valley. The site is located within four landscape character areas: 1A Stretton and Hatton, 1B Appleton Thorn, 3A Appleton Park and Grappenhall and 3B Massey Brook. These character areas do not restrict development or specify that any is more or less sensitive.

- 2.9 Topography and Watercourses – The site is relatively flat and sits at an elevation of 60-70m. There are no water courses running through the site and the site is located in Flood Zone 1.
- 2.10 Vegetation and Environmental Designations – Although there are some trees within the parcel, **there are no significant mature trees or TPO's within** the site boundary. In addition, there are no wildlife sites located within this site, with the nearest (The Bridgewater Canal) located 900m to the north of the site.
- 2.11 Movement Network – The site is well located in terms of the current highway network. Broad Lane to the east of the site and Grappenhall Lane to the south of the site are designated as key roads. In terms of access by foot, there is a public right of way on New Lane, which is located in the south west corner of the site.
- 2.12 Historic Assets – In terms of impact on heritage assets, this parcel will have no impact on the conservation areas, with the closest Conservation Area located over 1km north of the site. In terms of impact of listed buildings. There are 5 listed buildings within 500m of the site. Beehive Farm House is Grade II listed building located 250m south of the site on Barleycastle Lane. Given its adjacency to Applethorn Trading Park, development from this site would not be visible from this listed building and as such, this would not impact upon the setting of this listed building.
- 2.13 Booths Farm Farmhouse and the North-West side of the Farmyard are Grade II listed building and located 430m south of the site on Barleycastle Lane. These buildings are located to the south of the Trading Estate and as such, development on this site would not impact upon the historical setting.
- 2.14 Yew Tree Farm is located off Yew Tree Lane, 360m directly south of the site. This building is a Grade II listed building and is has more open views in a northerly direction. As such, development of the site may be visible from this building. Having said that, the B5356 runs between the site and this building and as such, with some sympathetic landscaping on site, any impact of its historic setting could be offset.
- 2.15 **Wright's Green House and Cottage are located on Lumb Brook Lane and are Grade II listed buildings.** They are located 455m west of the western boundary of the site. There are open fields in between the site and these buildings, however, subject to a sensitive landscaping scheme on site, there would be no effect from development on this site. These are also locally listed buildings, as designated in Appendix 3 of the adopted Core Strategy.
- 2.16 Bradley Hall Moated Site is a Scheduled Ancient Monument and is located 1.19km east of the site. Given that the Trading Estate sits in-between the site and this monument, we do not perceive there to be any heritage concerns as a result of development on this site. Finally, Manor Farm is designated in the adopted Core Strategy as a locally listed building. It is located 800m to the east of the site on Cartridge Lane, and as such, we do not consider this development to impact the setting of this building.

2.17 **Utilities and Site Constraints** – The ESSAR pipeline, a major oil pipeline, crosses the site from west to east and requires an easement on both sides; and there is capacity within the site to provide residential development and the relevant stand-offs. This pipeline crosses the majority of the Garden Suburb allocation and has proven not to constrain residential development to the west of the site.

2.18 **Summary:** As shown above, there are no factors which would prevent development from taking place on this site. This site is available, suitable and deliverable for residential development.

**ORANGE PARCEL - Land East of Broad Lane**

2.19 **Site Location** – This parcel of land is located to the east of Broad Lane and comprises 77 acres, which is currently in agricultural use. There are 2 separate fields, a large field to the south and smaller field to the north, as illustrated on the aerial below.

*Figure 2.3 – Land West of Broad Lane*



2.20 The smaller, northern parcel measures 12 acres. The site bound by Broad lane to the west and open fields to the north, south and east. There is a cluster of buildings along Broad Lane located in the south east of the parcel. These consist of farm buildings and residential dwellings. The site is bound by hedgerows with some larger trees within the hedgerows.

2.21 The larger, southern plot measures 65 hectares. This parcel is bound by Broad Lane to the west, Cartridge Lane to the south and open fields to the east and the west. Reddish Hall Farm is located in the south west corner of the site, which comprises of a number of farm buildings and a dwelling.

The site is bound by hedgerows, and has an area of three small ponds surrounding by trees along the eastern boundary of the site. There is one other small pond in the centre of the site.

- 2.22 Call for Sites – This parcel of land was not submitted the Call for Sites process.
- 2.23 Landscape Character – As noted above, the wider Garden Suburb is identified as falling within National Landscape Character Area NCA 60, Mersey Valley. The site is located within two landscape character areas 3A: Appleton Park and Grappenhall and 3B Massey Brook. As with the red parcel, these character areas do not restrict development or specify that any is more or less sensitive.
- 2.24 Topography and Watercourses – The site is flat, with a general slope upwards from north to south, ranging from 50-70m. There are no watercourses within the site boundary and this site is located in Flood Zone 1.
- 2.25 Vegetation and Environmental Designations – Although there are a small amount of trees **within the site and hedgerows, there are no significant mature trees or TPO's within the site** boundary. In addition, there are no wildlife sites located within this site, with the nearest (the Bridgewater Canal) located 440m to the north of the site.
- 2.26 Movement Network – The site is well located in terms of the current highway network. Broad Lane to the west of the site and Grappenhall Lane to the south of the site are designated as key roads. In terms of access by foot, there is a public right 500m to the west of the site.
- 2.27 Historic Assets - In terms of impact on heritage assets, this parcel will have no impact on the conservation areas, with the closest Conservation Area located over 600m north of the site. In terms of impact of listed buildings. There are 4 listed buildings within 1.2km of the site. Beehive Farm House is Grade II listed building located 600m south of the site on Barleycastle Lane. Given its adjacency to Applethorn Trading Park, development from this site would not be visible from this listed building and as such, this would not impact upon the setting of this listed building.
- 2.28 Booths Farm Farmhouse and the North-West side of the Farmyard are Grade II listed building and located 740m south of the site on Barleycastle Lane. These buildings are located to the south of the Trading Estate and as such, development on this site would not impact upon the historical setting. Yew Tree Farm is located off Yew Tree Lane, 830m to the south west of the site. This building is a Grade II listed building, however, given the Trading Estate is located in between the site and the building, development on this site would not impact the historic setting of this building.
- 2.29 Bradley Hall Moated Site is a Scheduled Ancient Monument and is located 1.2km to the south east of the site. There are some open views from the site to this monument. Having said that, the B5356 runs between the site and the monument and as such, with some sensitive landscaping in the south-east corner of the site, any impact could be mitigated against. Finally, Manor Farm is designated in the Appendix 3 of adopted Core Strategy as a locally listed building. It is located

930m to the east of the site on Cartridge Lane, and as such, we do not consider this development to impact the setting of this building.

2.30 **Utilities and Constraints** - The ESSAR pipeline, a major oil pipeline, crosses the site from west to east towards the southern boundary and as such, this will require easement measures. To the north of the parcel, there is a large parcel of land that would be able to support residential development provide a buffer.

2.31 **Summary** – As shown above, there are no constraining factors which would prevent residential development from coming forward on this site. This site should be considered as being suitable for delivering residential development in future years.

**PURPLE PARCEL Land North of Cliff Lane**

2.32 **Site Location** – This parcel of land is located to the north of Cliff Lane comprises 93 acres, which is currently in agricultural use. There are 5-6 separate fields of differing sizes and agricultural buildings within the land holding. The site is bound by the M6 to the east, Cliff Lane/Knutsford Road to the west and south and open fields to the south. Beyond these highways are open fields.

*Figure 2.4 – Land North of Cliff Lane*



2.33 Parcel 1 is the smallest parcel within this site measuring 5 acres. This parcel consists of the agricultural buildings of Howshoots Farm in the western area of the parcel. There is a dense

hedgerow along the southern boundary of the site with a small cluster of trees along the northern boundary.

- 2.34 Parcel 2 is the largest field within this parcel measuring 31 acres. The M6 runs along the eastern boundary and Cliff Lane/Knutsford Road along the western boundary. Towards the north-west of the parcel is the Massey Brook. In addition, there is a small pond surrounded by trees towards the centre of the site. The perimeter of the site is bound by a dense hedgerow.
- 2.35 Parcel 3 measures 14 acres and the perimeter is bound by hedgerows. There is a small pond within this parcel, which is located towards the western boundary. As with parcel 2, the Massey Brook runs along the southern/eastern boundary of the site. The A50 Knutsford Road runs along the western boundary and Cinder Lane to the north west. To the north of the site is open fields.
- 2.36 Parcel 4 measures 6 acres and is located towards the north of this site. The A50, Knutsford Road, is located to the west/south of the site, Cinder lane to the east and open fields to the north. The site is bound by hedgerows with a small pond surrounded by trees located adjacent to the boundary with Knutsford Road.
- 2.37 Parcel 5 measures 22 acres and is located to the north of this parcel. Cinder Lane runs along the western boundary of the site and Massey Brook along with dense hedgerows along the eastern boundary. The site is bound by open fields to the north and south of the site.
- 2.38 Parcel 6 measures 15 acres. Massey Brook/along with a dense hedgerow bound the site to the west, the M6 runs along the eastern boundary and open fields to the north and south. This parcel is part of a larger field which extends to the north. Towards the centre of this parcel, there is a cluster of trees.
- 2.39 Call for Sites – This parcel of land was not submitted to the Call for Sites process.
- 2.40 Landscape Character - As noted, the wider Garden Suburb is identified as falling within National Landscape Character Area NCA 60, Mersey Valley. The site is located within two landscape character areas 3A: Appleton Park and Grappenhall and 3B Massey Brook. As with the other parcels, these character areas do not restrict development or specify that any is more or less sensitive
- 2.41 Topography and Watercourses – The site is flat sat at an elevation of 30-40m towards the north of the parcel sloping upwards to 50-60m towards the south of the parcel. As stated above, the Massey Brook runs through this parcel of land. Despite the brook running through the site, this is a Flood Zone 1 area.
- 2.42 Vegetation and Environmental Designations – Massey Brook is designated as a Local Wildlife Site and as stated above, this runs through the site. This designation would be taken into consideration and incorporated into a masterplan to ensure it was retained and all wildlife species protected.

- 2.43 Movement Network – The site is extremely well located in terms of access to the local highway network. Knutsford Road, to the west of the site is a major A road and the M6 to the west is a major motorway. In terms of pedestrian access, there is a public right of way in the north-west corner of the site. There is also access to another public right of way from Cliff Lane on the southern boundary of the site.
- 2.44 Historic Assets – In terms of impact on heritage assets, this parcel will have no impact on the conservation areas, with the closest Conservation Area located over 1.5m north of the site. In terms of listed buildings, there are no listed buildings in close proximity which would be impacted by residential development on this site.
- 2.45 Having said that, Bradley Hall Moated Site is a Scheduled Ancient Monument located 500m to the south of the site. There are some open views from the site to this monument. Having said that, the Cliff Lane runs between the site and this monument. In response to this, a sensitive landscaping scheme could be implemented which would ensure that any impact that would occur from developing this site would be mitigated against.
- 2.46 There is a cluster of local listed buildings in and around Grappenhall, however, these are located over 600m to the north of the site and as such, this development would not impact upon their setting/character.
- 2.47 Utilities and Constraints - The ESSAR pipeline, a major oil pipeline, crosses the site from west to east dividing the site into two smaller parcels. Due to the location of this pipeline, easement measures will be needed as a buffer around this pipeline. Having said that, the pipeline divides the site into two sizeable parcels which are both capable of accommodating residential development.
- 2.48 Summary: As shown above, this site has no constraining factors which would prevent development on this site and as such, should be considered as deliverable, available and suitable for residential development.

### 3. DELIVERY OF MASTERPLAN AND WIDER GARDEN SUBURB PROPOSAL

3.1 The previous section reviewed the characteristics and **suitability of Taylor Wimpey’s individual** landholdings within the Garden Suburb, but we now look at deliverability issues within the wider Garden Suburb, as raised in our general representations; and how the masterplan might be refined to address these issues to accelerate delivery.

#### The Proposal & Concept Masterplan

3.2 The Warrington Garden City Suburb is identified in Chapter 5 (page 40) of the main consultation document, where it is proposed for approximately 7,000 units to be delivered over the 20 years of the plan, including an extensive employment area and 3 Garden Neighbourhoods centred around a new District Centre and Country Park.

3.3 The anticipated trajectory is set out in Table 19, and a Conceptual Masterplan at Figure 7 which are based on a Framework Plan Document prepared by AECOM.

	0-5	6-10	11-15	16-20	Total
Garden City Suburb	406	496	48	0	950
Garden City Suburb (Green Belt)	0	2,114	2,096	2,114	6,324
<b>TOTAL</b>	<b>406</b>	<b>2,610</b>	<b>2,144</b>	<b>2,114</b>	<b>7,274</b>

3.4 The chosen Garden Suburb option was refined from:

- 1) *High Level Spatial Option 2 'Majority of Green Belt release adjacent to main urban area with incremental growth in outlying settlements' at Stage 3;*
- 2) *Garden Suburbs of varying sizes (4,000, 6,000 and 8,000 dwellings) formed 3 of the 6 components of the Development Options at Stage 4, based on Area Profiles and Sustainability Appraisal evidence;*
- 3) *These components were included in 4 of the 5 Development Options at Stage 4, with Option 2 chosen – 'Option 2 - A Garden City Suburb of approximately 6,000 homes & an urban extension to the south west of Warrington of up to 2,000 homes';*

3.5 Whilst we have some comments on how this wider development option was arrived at, we fully support the identification of the Garden Suburb and note that the identification of significant employment land, schools and retail units within the allocation will provide a level of self-sufficiency and reduce pressure on the Warrington Urban Area in terms of commuting and associated congestion.

3.6 We also welcome the high level masterplanning work undertaken to date; albeit this will need to be explored in significantly more detail before the next version of the plan is released and will require input from all landowners and developers involved. Indeed, it is suggested that some clarity is provided over how this strategic allocation will be managed and brought forward and whether this will require a separate DPD/Area Action Plan document, as this could obviously have

implications on delivery. A more coherent analysis of individual land parcels would assist in demonstrating a robust phasing programme for delivery, and we provide some suggestions on this below.

#### *Wider Deliverability Issues*

- 3.7 As noted in our general representations, we disagree with the preferred development option on the basis that it is over-reliant on a small number of large strategic sites, which will ultimately limit choice in the market, and the opportunities for some small/medium sized housing developers to be engaged, whilst it is also likely to lead to significant under delivery in the earlier years of the plan period. To demonstrate this, we provided our own deliverability assessment in our general representations.
- 3.8 In respect of the Garden Suburb, we note how applying Lichfields empirical evidence on delivery of large urban extensions suggests a 10.8 year lead in time for delivery to begin and an average build rate of 161 dpa; which would lead to less than a quarter of the dwellings in the Green Belt being delivered within the plan period (1,449 of 6,324), with nearly 5,000 pushed beyond 2036.
- 3.9 We strongly believe that this particular Garden Suburb can exceed this and deliver 300-400 units a year; because it is of a larger scale than **the 2000+ category used by Lichfield's and benefits from** significant road frontages offering a good number of access points and an existing internal road structure, meaning there is scope for a substantial number of sales outlets operating at any one time.
- 3.10 This will only be achieved if the Council work closely with the development industry and landowners on a comprehensive masterplan, which facilitates the early delivery of those parcels that open up land parcels that are currently inaccessible (either due to constraints on the existing network or by virtue of being land-locked).
- 3.11 As such, we would recommend that an early meeting is arranged by the Council with all land owners and promoters to facilitate this shortly after the closure of this current consultation period; with reference to our detailed comments below.
- 3.12 Finally, we also disagree with allocating all the safeguarded land in one location, as this could generate similar delivery issues into the next plan period.

#### Detailed comments on the Masterplan

- 3.13 We now provide more detailed comments on the deliverability of the masterplan and proposed phasing arrangements, taking account of the relevant NPPF and NPPG guidance, which confirms that to be considered deliverable, sites should, at the point of adoption of the relevant local development document:
- Be available – there is confidence that there are no legal or ownership problems.

- Be suitable – it offers a suitable location for development and would contribute to the development of sustainable and mixed communities.
- Be achievable – there is a reasonable prospect that housing will be developed on the site at a particular point in time.

3.14 We address each of these elements in turn.

#### *Availability*

3.15 Taylor Wimpey have legal control over the three parcels set out in sections 1 and 2 and are seeking to develop these at the earliest opportunity. Furthermore, there are no ransom strips, tenancies or other ownership problems which could prevent or delay this.

3.16 The site is therefore in the control of a major national housebuilder, with a proven track record, and must be regarded as wholly available.

3.17 In terms of wider availability within the Garden Suburb, the AECOM Framework Document notes **that over 20 'call for sites' submissions were made in the allocated area; which covers a total area of 1,227.8 Hectares.**

3.18 We counted 8 individual **'call for sites' submissions for residential development in the Garden Suburb**, covering an area of 330.16 Ha. This suggests that only a quarter (26.9%) of the allocation has actually been promoted for residential development, and is therefore confirmed as available. Even if this is combined with the 116.8 Ha of proposed employment land then only a third of the land is confirmed as available (36.3%).

3.19 Whilst we acknowledge that much of the Taylor Wimpey land has not been promoted previously (part of the red parcel forms part of call for sites R18/142), and that other landowners may become active now the site has been allocated, there is no guarantee of this and it is worrying that nearly two thirds of this area could technically be considered unavailable at this stage.

3.20 This brings the deliverability of the masterplan into question, and provides further evidence that the Council need to engage with all landowners and promoters in the area as soon as possible before progressing to the next stage of the plan.

3.21 Until further landowners are engaged it is suggested that residential development is directed towards those parcels that are being actively promoted, and are confirmed as suitable; otherwise early delivery will not be achieved and a 10+ year lead-in time becomes a distinct possibility.

#### *Suitability*

3.22 In respect of suitability, section 2 details the individual site characteristics and constraints of the three Taylor Wimpey parcels and confirms that there are no technical issues preventing their development.

- 3.23 Moving onto wider suitability issues and constraints within the Garden Suburb, we note the following.
- 3.24 Landscape Character – The six individual landscape character areas across the site do not restrict development or specify that any is more or less sensitive; whilst the wider Arup Green Belt Assessment concluded that General Area 10 made a weak contribution to the Green Belt and General Area 9 a moderate contribution. This suggests that the whole area can be developed without generating adverse landscape impacts.
- 3.25 Topography and Watercourses – Whilst there are several rivers and brooks within the wider area, the vast proportion of the land is within Flood Zone 1 and is therefore relatively unconstrained in drainage terms.
- 3.26 In respect of topography the site slopes gently down from the motorway in the south to the urban area in the north creating an even and well contained landscape, again supporting development across the whole site.
- 3.27 Vegetation and Environmental Designations –The majority of local wildlife sites are located around the Appleton/ Grappenhall fringe and the Bridgewater Canal to the north of the Garden Suburb; whilst clusters of mature trees are spread more widely through the site, they are more prevalent to the north, and will therefore mainly affect the proposed residential parcels to the north (B1- B5), the northern part of the safeguarded land, and the Country Park.
- 3.28 As such these parcels will need to consider how they integrate with the urban fringe, whilst maintaining the relevant wildlife corridors and stand-offs.
- 3.29 The Taylor Wimpey parcels are relatively unconstrained in this respect suggesting they could potentially support higher density development.
- 3.30 Movement Network – The Garden Suburb is generally well connected to the motorway network with local connections running north south (A49/A50) and east west (B5356); albeit it is acknowledged that significant improvements will be required, including to public transport.
- 3.31 All three Taylor Wimpey parcels have direct access onto the existing road network, either at Broad Lane and Knutsford Road; whilst the red and purple parcels are flanked by public rights of way, which can be integrated with the development and preserved.
- 3.32 However, as noted previously, some parcels and ownerships do not have direct access to these **main roads and therefore early delivery should be prioritised on sites such as Taylor Wimpey’s parcels** which can open up these land-locked parcels.
- 3.33 Historic Assets – The majority of the Listed Buildings are clustered around Grappenhall, to the north of the allocation (closest to parcel B1 and some of the safeguarded residential land), and around Appleton Thorn/ Appleton Thorn Trading Estate to the south (close to parcels A4, B10, B9

and the District Centre); which will need careful consideration, albeit there is no suggestion that these will prevent development on these parcels.

- 3.34 The three Scheduled Ancient Monuments within the site could cause greater concern, particularly Bradley Hall Moated Site in the south west corner of the Garden Suburb within the employment area; as this large allocation is likely to have substantial impact on its setting. This would potentially support moving the employment land further north, and exchanging it or integrating it with the safeguarded land to the north, to allow a longer period to address the heritage issues or at the very least softening the landscape somewhat by providing a mix of uses and preventing it from being wholly employment based.
- 3.35 Utilities and Site Constraints – The ESSAR pipeline passes through all three of the Taylor Wimpey parcels and will traverse the proposed District Centre and strategic road network. Given its significance it is suggested that the Council engage the relevant statutory undertakers as part of the engagement process to identify the strategic implications and opportunities for mitigation.
- 3.36 Otherwise it appears the wider area is relatively well served by existing services, and can work around other physical constraints.

#### Achievability / Delivery

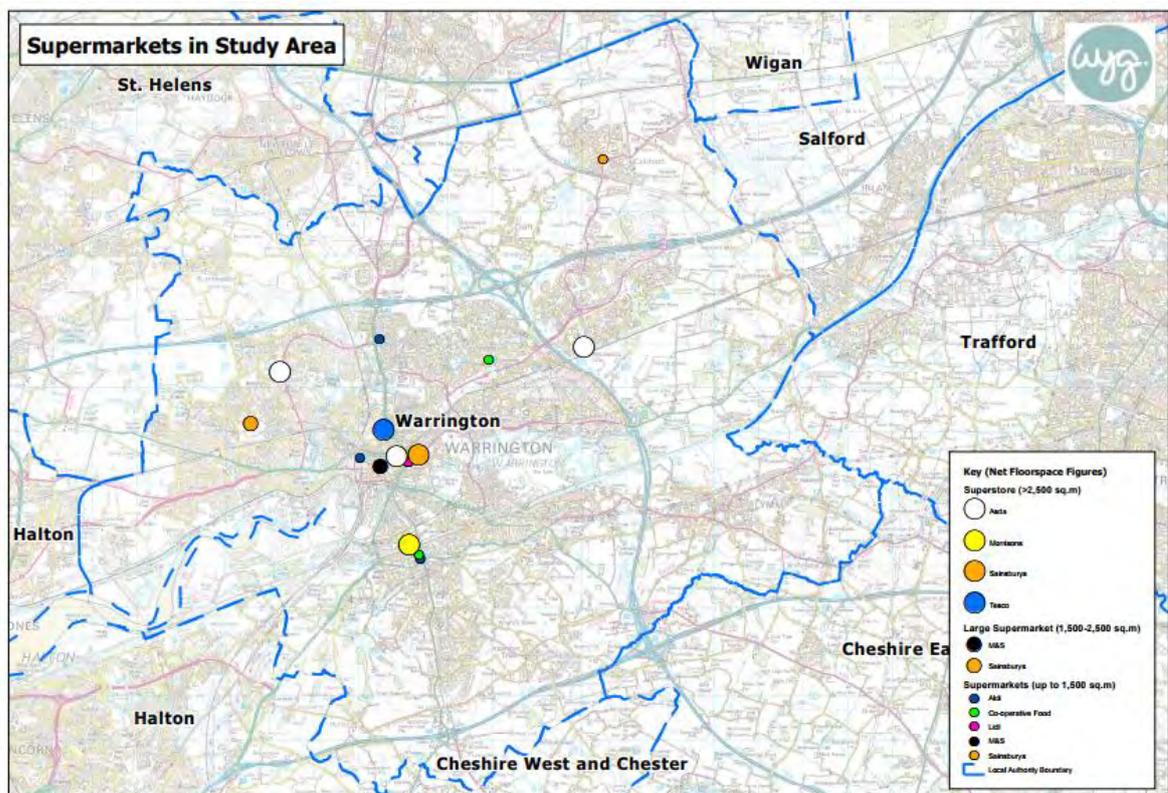
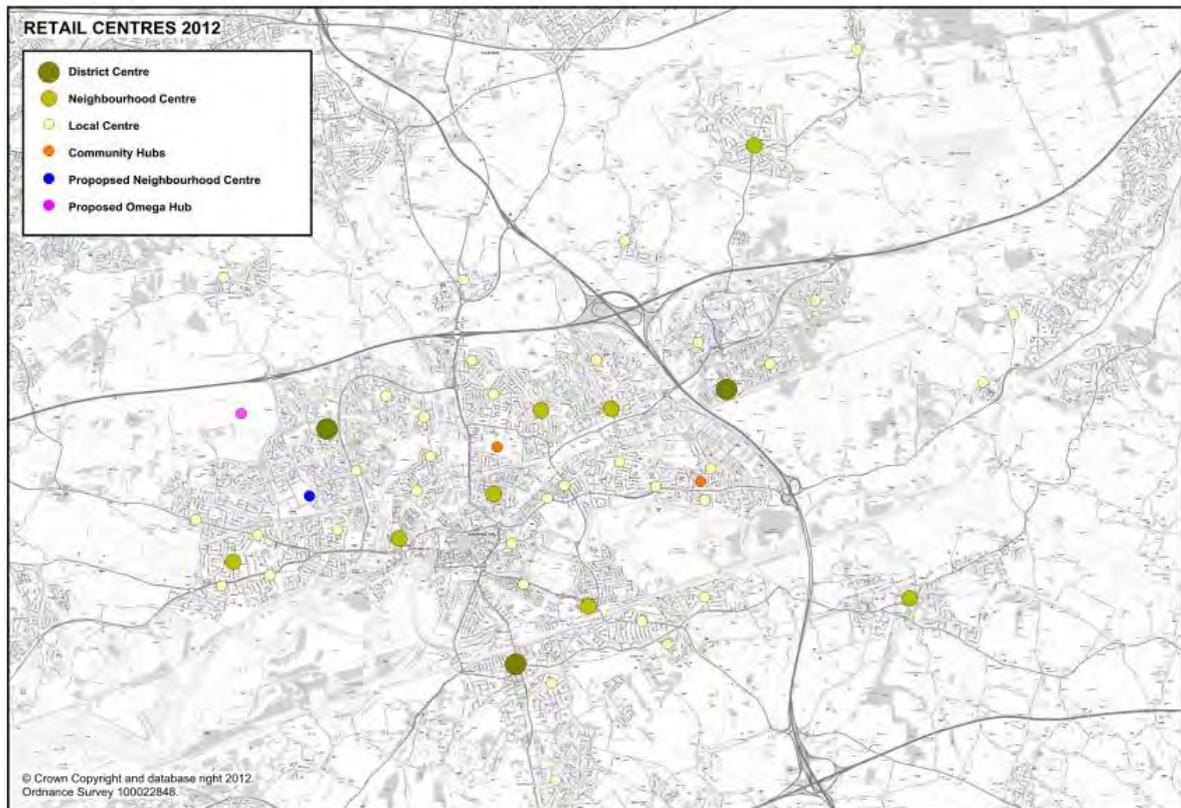
- 3.37 Taking account of the availability and suitability issues outlined above we make the following comments and suggestions on the overall layout and phasing of the development, with reference to the phasing plans shown at page 37 (Figures 4.1-4.4) of the AECOM Framework document:

#### District Centre/ Retail Provision

- 3.38 **The Council's proposals show the** District Centre towards the centre of the overall Garden Suburb site and the need for 4 other local village centres within the Garden Suburb. Whilst we do not dispute the need for a range of uses to come forward within the Garden Suburb, no detailed evidence on the quantitative and qualitative need for retail and leisure development has been provided which fully aligns with the Local Plan preferred options. As such, we reserve the right to provide further comments once this evidence base has been established.
- 3.39 With regard to the proposed location of the District Centre, if it were a new, standalone settlement, its central location within the Garden Suburb site could be regarded as logical and having merit. However, the new suburb will function as an extension to Warrington, which has an existing town centre hierarchy and other retail and leisure provision within the existing urban area. The proposals for new retail centres, therefore, need to be considered in this context. Once again, its location needs to be considered in light of up to date evidence on existing shopping and leisure patterns, the quantitative and qualitative need for new floor space (as noted above), and a health check of existing centres within the vicinity.

- 3.40 **With regard to its proposed scale, the Council’s masterplan indicates the proposed District Centre** is a very large area of land (totalling 55 Ha). Again, this scale needs to be tested in light of up to date evidence on retail shopping patterns and the extent of expenditure that will be generated by the Garden Suburb development of 7,000 + units and the wider South Warrington area.
- 3.41 Connected to the points we raise about its location, scale and deliverability, the current masterplan illustrates that the District Centre will only be flanked by 4 development parcels (B8, B9, C2 and C3). These provide a notional total of 1,288 residential units, with the majority of the proposed District Centre bounded by the employment area to the south and Country Park to the north. This only provides a very limited number of residential units that could be said to be within walking distance from the new centre, which we do not consider to be sustainable in terms of promoting alternate travel modes but also sustaining a range of businesses that will be dependent on day to day footfall.
- 3.42 This issue is compounded by the fact that the District Centre is due to come forward in Phase 2, with just 260 residential units delivered in the same phase on parcel B9. Clearly this will not be conducive in delivering a vibrant and viable district centre early on in the development of the Garden Suburb, which we consider will be critical if the entire development proposal is to be successful in attracting new residents and businesses.
- 3.43 We note the Council commissioned WYG to undertake a Retail and Leisure Study, which was published in 2015. This followed a Retail Centres Study carried out in 2012. Neither account for the level of housing growth put forward in the Local Plan. As such, it is not a complete evidence base for the purpose of assessing what is the most appropriate retail and leisure (and other service uses) strategy for the Garden Suburb proposal.
- 3.44 However, we have reviewed the WYG evidence and Retail Centres study and observe the following provision is located in relatively close proximity to the Garden Suburb:
- 1 District Centre (Stockton Heath) and 5 Local Centres;
  - **1 large ‘main-food’ supermarket (Morrisons), 1 Discounter supermarket (Aldi); and several small convenience stores.**
- 3.45 Compared to the provision in the northern parts of Warrington, it is evident that the southern part of Warrington is comparably under provided for (albeit this does reflect the extent of the existing urban area and population).

Figure 3.1 – Retail Centres and Supermarkets in Warrington



- 3.46 In terms of the quantitative need for convenience goods, Table 7.3 of the WYG assessment confirms a deficit up to 2025 and the need for only 1,000-1,900 sq m by 2030.
- 3.47 Future comparison goods floorspace requirements are higher at 12,000-21,100 sq m by 2025 and 24,700-41,100 sq m by 2030 (Table 26c – Appendix 5 of the WYG Assessment).
- 3.48 Whilst some of this need, could be directed towards a new District Centre, we would expect Warrington Town Centre to be the principal target for accommodating comparison retail floorspace given it will sit higher in the town centre hierarchy and will be the first centre in which to apply the sequential test as required by the NPPF when locating new retail floorspace. The same could be said for the convenience floorspace need but it is accepted that this is best met as locally as possible given the regular need to purchase such goods.
- 3.49 Whilst the extent of this need will need to be tested and cross checked with the anticipated population growth within the Local Plan (which could increase the requirement), we do note that Table 1 (Appendix 5) of the WYG study already accounts for sizable population growth within the Warrington Zones. Moreover, some of this expenditure growth will be taken up with existing retail commitments within the Study Area as shown in Table 6d and 26d, Appendix 5 the WYG assessment.
- 3.50 In short, the proposal for a new district centre will need to be fully tested in terms of need (as required by paragraphs 23 and 116 of the NPPF), and the sequential test (as required by paragraph 23 of the NPPF). The NPPF also notes that policies should be set for retail provision that is not within a town centre. In this case, it will be prudent to ensure that any retail floorspace does not have an adverse impact on existing centres. This should be considered through the Local Plan process and if that is not possible, it will be necessary for any applications for retail, leisure and office space to be tested in the context of paragraphs 26 and 27 of the NPPF (the impact tests).
- 3.51 To conclude, in order to deliver a successful District Centre, it will be necessary to fully explore the extent of the need and what population within its immediate catchment area will be necessary to ensure it is successful. Moreover, in order to give any District Centre the best start, it would be logical to move it closer to the existing population or to locations in close proximity to the first phases of substantial housing delivery. For instance, a location further northwest towards the existing communities of Grappenhall, Appleton, and Grappenhall Heys (within or around parcels B1-B5) would seem ideal as it would generate footfall and patronage from existing and new residents, helping to get the District Centre up and running in Phases 1 and 2.
- 3.52 We recognise this would place it in closer proximity to Stockton Heath District Centre but according to the WYG assessment, Stockton Heath is a very healthy centre **and the Morrison's store is significantly overtrading by £16.8m per year<sup>1</sup>** (with evident congestion issues on the ground). This

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<sup>1</sup> See paragraph 7.49 of WYG 2015 Assessment

would suggest the centre and key retail provision within it would be able to withstand some impact and the diversion of some trade is likely to deliver a better customer experience for existing residents in the area overall.

- 3.53 It would also be logical for the secondary school (which is due to form part of the District Centre) to be located closer to existing residents, given there is only one other secondary school in South Warrington (Bridgewater High School).
- 3.54 The alternative would be to locate more residential development around the District Centre early on in the delivery process but this would require relocating or amending the position of the Country Park and employment land designations.
- 3.55 As such it is our strong view that the District Centre should be moved from its current location.

#### Country Park

- 3.56 Given the ecological constraints, it would be logical to provide some open space in this general location to the north of the Garden Suburb. However, at 84 Ha, this is very large area. There has been no quantitative analysis presented of the need for open space, or consideration of whether this would be better spread around the allocation within a clear network of green infrastructure, linking smaller communities, and therefore it is possible that this could be moved further north and additional residential land allocated.
- 3.57 Indeed, there is scope for a substantial linear park through the Garden Suburb by virtue of the ESSAR pipeline and its extensive stand-off zone. We note that this aspiration is depicted on one of the masterplan iterations but does not appear to translate to the more detailed zonal plan to the fullest effect. Provision of a high quality green lung through the Garden Suburb connecting to existing open space towards Stretton (where the pipeline continues), could help reduce the extent of the proposed Country Park whilst ensuring substantial green infrastructure is delivered through the master planning process.
- 3.58 A linear park of this nature could also assist in defining alternative strong boundaries for alternative Safeguarded Land locations to the south.

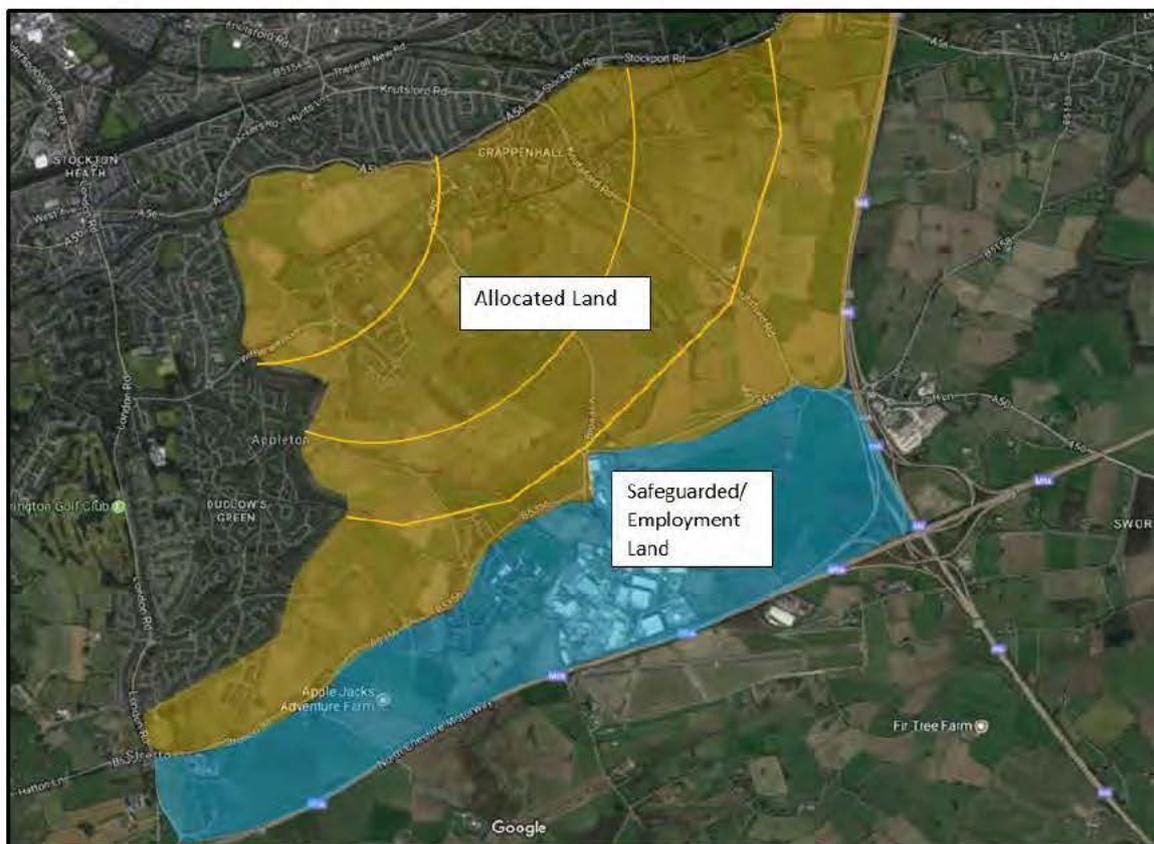
#### Employment Land

- 3.59 Moving or splitting the employment land would be another option, and we have already noted in respect of heritage constraints that it may be beneficial to exchange this for safeguarded residential land to the east of Knutsford Road to soften the landscape here; whilst it is our general view that the safeguarded land should be dispersed more evenly across the Garden Suburb and borough as a whole.

Safeguarded Land

- 3.60 It is considered that a more logical phasing of development would be to grow Warrington out from the existing urban edge, in concentric phases (albeit ignoring the employment allocation which needs to be next to the motorway junction). Importantly, this option should be explored through the SEA as a reasonable alternative.
- 3.61 This would result in safeguarded land being identified south of Grappenhall Lane (B5356) or the proposed/suggested linear park (see above), which would provide equally defensible boundaries for the longer-term development and particularly for development beyond the plan period as this would then focus on the M56 boundary to the south.

*Figure 3.2 – Alternative Phasing Plan*



- 3.62 The above plan and alternative proposals are indicative at this stage and we reserve the right to make further comments and develop our case as the masterplan evolves. In fact, we suggest that the Council undertake full consultation with the relevant landowners before the masterplan and phasing proposals are refined further, starting with an initial meeting as suggested above.

#### 4. CONCLUSIONS

4.1 We fully support the identification of the Garden Suburb allocation, and have demonstrated that the three parcels within it and under the control of Taylor Wimpey are sustainable and deliverable in the context of the wider allocation and could all support residential or other development.

4.2 To assist in the masterplanning process we have suggested a meeting with all relevant landowners and promoters at the earliest convenience, noted where further evidence and justification is required and also suggested how the masterplan might be amended and refined to help facilitate early delivery, including the following recommendations:

- Phasing development in a concentric manner so it logically extends the existing outer urban edge of Warrington;
- Fully explore the need for a new District Centre in quantitative and qualitative terms, and determine if this need is best met within the Garden Suburb or existing nearby centres through the application of the sequential test.
- Assuming a District Centre is required, fully test its impact on existing centre to ensure the scale is appropriate.
- If a District Centre is required, relocate it closer to existing residential communities to drive footfall and early take-up of units or concentrate more substantial levels of new housing around it within an early phase of delivery.
- Reducing the size of the Country Park pushing it north with residential development to the south, and supplement this green infrastructure with a high quality Linear Park along the route of the existing ESSAR pipeline.
- Dispersing the safeguarded land more evenly across Warrington and across the Garden Suburb with obvious locations located to the south of Grappenhall Lane or the proposed Linear Park.

## APPENDIX 2 – GREEN BELT ASSESSMENT



# WARRINGTON PROPOSED SUBMISSION VERSION LOCAL PLAN 2017-2031 CONSULTATION

## GREEN BELT ASSESSMENT

## WARRINGTON GARDEN SUBURB

## TAYLOR WIMPEY (UK) LTD

Date: June 2019

Pegasus Reference: KL/P16-1405/R007v2

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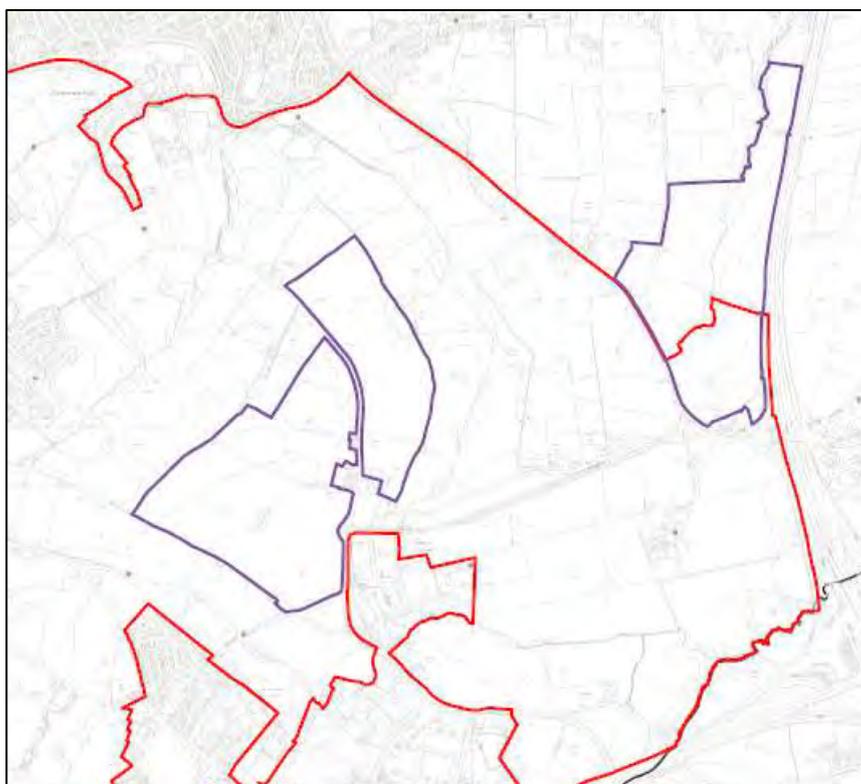
## 1. EXECUTIVE SUMMARY

- 1.1 This Green Belt Assessment has been prepared on behalf of Taylor Wimpey (UK) Ltd, in respects of land interests within the Garden Suburb, Warrington. A two-staged Green Belt Assessment has been prepared by Arup as part of the preparation of the Warrington Local Plan Review. Pegasus Group have reviewed and commented on the Stage 1 assessment with reference to the General Areas identified within the Garden Suburb Area.
- 1.2 **The Council accept that Green Belt release is required to meet Warrington's own future development needs and the extent of those needs coupled with the economic and social consequences of meeting them in full provide 'exceptional circumstance' that warrant Green Belt release within the Borough.**
- 1.3 The Council are proposing to address some of their future housing and employment needs through the identification of a Garden Suburb. In order to accommodate this, the Council are proposing to release Green Belt land as there is insufficient land within the existing urban area of Warrington.
- 1.4 We have some serious concerns with large-scale growth to the north, east or west of the main urban area of Warrington owing to issues with the coalescence and the sprawl of the main urban area of Warrington, as well as the sprawl with the neighbouring authorities such as Halton and St Helens. To the south of the main urban area of Warrington is considered to be the most appropriate location to accommodate future development.
- 1.5 In terms of identifying the most suitable location for a Garden Suburb, the areas which contribute the least towards the five Green Belt purposes should be identified in the first instance. The Garden Suburb is to be located within General Areas 9 and 10. As demonstrated throughout this report, General Area 10 contributes least towards the Green Belt purposes compared to the other General Areas.
- 1.6 General Area 9 is located adjacent to the General Area 10 and although there is limited built form with the General Area, it is well related to the existing settlement edge and General Area 10. The General Area is bound by strong, durable and permanent boundaries and is not located in close proximity to neighbouring settlements.
- 1.7 As such, after completing a full review of the General Areas around Warrington, we agree that the most appropriate location for a large scale development (such as the Garden Suburb) would be to the south of Warrington. General Area 10 has the least contribution to Green Belt purposes and therefore we fully support and uphold that the Garden Suburb should be located within General Areas 9 and 10.

## 2. INTRODUCTION

- 2.1 The following assessment has been prepared on behalf of Taylor Wimpey (UK) Ltd (Taylor Wimpey) who have requested that Pegasus Group undertake a Green Belt assessment of relevant land parcels surrounding the Proposed Garden Suburb, Warrington.
- 2.2 Taylor Wimpey control 117.5 hectares of land to the south west of Warrington. Their land interests are shown in Figure 1 below which is marked by the purple line. The red line marks the proposed Garden Suburb area.

Figure 1 – **Taylor Wimpey's Land Interests**



Warrington

- 2.3 Warrington is a large town located on the banks of the River Mersey which is located 20 miles east of Liverpool and 20 miles west of Manchester. Warrington's resident population now stands at 209,700 (this is a mid-year estimate from 2017). This is a 0.4% increase from the 2016 estimates. Warrington is the largest town in the county of Cheshire.

Summary of Approach/Methodology

- 2.4 Our approach to the assessment is summarised below and set out in more detail in the following sections.
- 2.5 In short, it takes into account the following aspects of the National Planning Policy Framework, which we highlight in more detail in Section 3:

- The fundamental aim of Green Belt, as defined by paragraph 133 of the NPPF;
- The five purposes of Green Belt, as set out at paragraph 134 of the NPPF;
- Relevant considerations to be applied when defining Green Belt boundaries, as set out at paragraph 136 of the NPPF; and
- The beneficial use of Green Belt, as set out at paragraph 141 of the NPPF.

2.6 We also go on to consider how the NPPF policies have been considered in the context of any relevant case law within Section 3.

2.7 We then consider other previous Green Belt Assessments in Section 4, including:

- The Green Belt Assessment carried out by Arup on behalf of Warrington Borough Council in October 2016; and
- The Green Belt Assessment (additional site assessments of Call for Sites Responses and SHLAA Green Belt Sites) - July 2017.

2.8 We then consider the implications of other Local Plan documents and proposals in the area in Section 5, including:

- The adopted July 2014 Core Strategy; and
- The emerging Local Plan.

2.9 We provide initial comments in relation to the Green Belt in and around Warrington in the context of the proposes, aims and beneficial use of Green Belt land and the above documents within Section 6. We then go on to consider the Green Belt General Areas assessed by Arup in the Stage 1 assessment in light of the above issues and provide our own judgements accordingly within the Proformas attached at Appendix 1.

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3. NATIONAL PLANNING POLICY GREEN BELT CONSIDERATIONS

- 3.1 The Submission Version of the Warrington Local Plan (2017-2037) was published for public consultation in April 2019. As such the Local Plan will be considered by the Inspector under NPPF (2019).
- 3.1 **As stated in paragraph 11, for plan making this means that Local Planning Authorities (LPA's) should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.**
- 3.2 Paragraph 15 goes on to confirm that the planning system should be plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 3.3 When commenting on local plan making, paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and quality of development and make specific provision for:
- i. Housing (including affordable housing), employment, retail, leisure, and other commercial development;*
  - ii. Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management and the provisions of minerals and energy;*
  - iii. Community facilities (such as health, education, and cultural infrastructure); and*
  - iv. Conservation and enhancements of the natural, built and historic environment, including landscapes and green infrastructure and planning measures to address climate change mitigation and adaptation.*
- 3.4 **In terms of housing provision, paragraph 59 states that in order to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed.**
- 3.5 Paragraph 72 goes further to comment that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such a new settlements or significant extensions to existing villages and towns, provided they are well located and designed, **and supported by the necessary infrastructure and facilities. LPA's should work with the support of their communities and other authorities if appropriate to identify suitable locations for such development where this can help to meet identified needs in a sustainable way and reference is made to whether it is appropriate to establish Green Belt around or adjoining new developments of a significant size.**

3.6 Section 13 of the NPPF refers to the Green Belt and paragraph 133 confirms the Government attached great importance to Green Belts at the outset. It goes on to say:

*'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristic of Green Belts are their openness and their **permanence.**'*

3.7 Paragraph 134 goes on to confirm that Green Belt serves five purposes:

- i. To check the unrestricted sprawl of large built up areas;*
- ii. To prevent neighbouring towns merging into one another;*
- iii. To assist in safeguarding the countryside from encroachment;*
- iv. To preserve the setting and special character of historic towns; and*
- v. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

3.8 Paragraph 135 confirms that the general extent of Green Belt across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should:

- i. Demonstrate why normal planning and development management policies would not be adequate;*
- ii. Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;*
- iii. Show what the consequences of the proposal would be for sustainable development;*
- iv. Demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and*
- v. Show how the Green Belt would meet other objectives of the framework.*

3.9 Paragraph 136 goes on to state:

*'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.'*

3.10 Paragraph 138 advises that when drawing up or reviewing Green Belt boundaries, LPA's should take account of the need to promote sustainable patterns of development. A distinct difference

between the NPPF 2012 and the RNPPF 2018 is that paragraph 138 goes further than the previous paragraph 84 to state that where it has been concluded that it is necessary to release Green Belt land for development, which is the case with East Dorset, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.

3.11 Importantly, paragraph 139 states that Local Authorities should apply the following when defining Green Belt boundaries:

- i. Ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;*
- ii. Not include land which it is unnecessary to keep permanently open;*
- iii. Where necessary, identify in their plans 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;*
- iv. 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 a Local Plan review which proposes the development;*
- v. Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- vi. Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

3.12 Paragraph 140 of the Framework relates to the inseting of villages and comments that:

***'If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.'***

3.13 It is noteworthy that the above approach to villages is quite different to that set out in the former national planning policy on Green Belts (PPG2) which took a different approach to how villages were defined / inset within the Green Belt. As such, there are often consequences associated with this component of a Green Belt review when preparing a new proposals map for a Local Plan review.

3.14 The fundamental aim and 5 associated purposes stated above (in paragraph 133 and 134) clearly forms a foundation for any Green Belt review/assessment. However, it should also be noted that **the NPPF goes onto confirm at paragraph 141 that once Green Belts have been defined, LPA's should plan positively to enhance the beneficial use of the Green Belt, such as:**

- *Looking for opportunities to provide access;*

- *To provide opportunities for outdoor sport and recreation;*
- *To retain and enhance landscapes, visual amenity and biodiversity; or*
- *To improve damaged and derelict land.*

3.15 As such, it follows that if certain parts of the Green Belt serve a number of the 5 purposes or have other attributes as listed above, then the importance of that particular part of the Green Belt is likely to be heightened.

3.16 Paragraphs 145 and 146 confirm the type of development that is deemed to be appropriate in the Green Belt.

3.17 The above considerations are also very important when undertaking a Green Belt assessment / review. Indeed, the nature and characteristics of Green Belt land will inevitably alter over time in light of the fact that not all development in the Green Belt is restricted (as per paragraphs 145 and 146 of the NPPF). As such, it is not unreasonable to assume that there will often be a need to review the precise and detailed boundaries around a settlement from time to time. In doing so, it is important to remember the need to define boundaries clearly using physical features that are readily recognisable and likely to be permanent and omit land that is not necessary to keep permanently open (as per paragraph 139).

#### *Other Relevant non-Green Belt Policies in the NPPF*

3.18 In recognition of some of the points made in paragraphs 134 and 141 of the NPPF (see above), we also refer to other relevant non-Green Belt policies below.

3.19 Paragraph 149 states that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications of flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Paragraph 150 goes on to add that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.

3.20 At paragraph 172 the NPPF advises that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty. This paragraph goes on to advise that planning permission should be refused for major developments in these areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of;

- *The need for the development, including in terms of any national considerations and the impact of permitting it, or refusing it, upon the local economy;*
- *The cost of, and scope for, developing elsewhere outside the designated area, or*

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*meeting the need for it in some other way; and*

- *Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

3.21 Reference is also made at paragraph 175 to proposed development that is likely to have an adverse effect on a Site of Special Scientific Interest. In this case, development would not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts of the national network of Sites of Special Scientific Interest. Development resulting in the loss or deterioration of irreplaceable habitats should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

3.22 When commenting upon the historic environment, paragraph 193 advises that when considering the impact of a proposed development on the significance of a designated heritage asset, **great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or loss than substantial harm to its significance.** Paragraph 195 goes on to state that where a proposed development will lead to substantial harm to a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

*Other Relevant non-Green Belt Policies in the NPPF*

3.23 We also refer to other relevant non-Green Belt policies below. Paragraph 99 advises that Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. Paragraph 100 goes on to add that development should be directed away from areas at highest risk of flooding, but where development is necessary, making it safe without increasing flood risk elsewhere. Reference is also made to a sequential test being applied to ensure development is steered to the areas with the lowest probability of flooding.

3.24 At paragraph 115 the NPPF advises that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty. Paragraph 116 goes on to advise that planning permission should be refused for major developments in these areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of;

- The need for the development, including any national considerations and the impact of permitting it, or refusing it, upon the local economy;
- The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- Any detrimental effect on the environment, the landscape and recreational opportunities,

and the extent to which that could be moderated.

- 3.25 Reference is also made at paragraph 118 to proposed development that is likely to have an adverse effect on a Site of Special Scientific Interest not normally being permitted, and planning permission should be refused for development resulting in a loss or deterioration of irreplaceable habitats, including ancient woodland, unless the need for, and benefits of development in that location clearly outweigh the loss. The Framework also advises that potential Special Protection Areas, possible Special Areas of Conservation and listed or proposed Ramsar sites should be given the same protection as European sites.
- 3.26 When commenting upon the historic environment, paragraph 132 advises that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be. It advises that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.
- 3.27 When commenting upon plan making, paragraph 156 refers to the Local Plan needing to set out strategic priorities for an area, including policies to deliver homes and jobs needed. The Framework goes on to confirm that Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives and policies of the Framework.

#### Other Relevant Guidance

- 3.28 Neither the NPPF nor National Planning Practice Guidance (PPG) provides guidance on how to undertake Green Belt reviews. These include:
- Planning on the Doorstep: The Big Issues – Green Belt, Peter Brett for Planning Advisory Service (February 2015).
  - Approach to Review of the Green Belt, Planning Officers Society (March 2015).
- 3.29 These reports provide useful discussions on some of the key issues associated with assessing the Green Belt. The PAS guidance considers the way in which the five purposes of Green Belt should be addressed, as follows:
- Purpose 1: To Check the Unrestricted Sprawl of large built up areas – this should consider the meaning of the **term 'sprawl' and how this has changed from the 1930s when Green Belt was conceived.**
  - Purpose 2: To Prevent Neighbouring Towns from merging into one another - **assessment of this purpose will be different in each case and a 'scale rule' approach should be avoided.** The identity of a settlement is not determined just by the distance to another settlement; instead the character of the place and the land between settlements must be acknowledged. Landscape character assessment is therefore a useful analytical tool to use in undertaking this purpose.

- Purpose 3: To assist in safeguarding the countryside from encroachment - the most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.
- Purpose 4: Preserving the Setting and Special Character of Historic Towns – this applies to very few places within the country and very few settlements in practice. In most towns, there are already more recent development between the historic core and the countryside.
- Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose.

3.30 It also states that the assessment of the performance of Green Belt should be restricted to the Green Belt purposes and not consider other planning considerations, such as landscape, which should be considered in their own right as part of the appraisal and identification of sustainable patterns of development.

3.31 **The Planning Advisory Service 'Planning on the Doorstep: The Big Issues – Green Belt'** provides advice with regard to the assessment of Green Belt within Local Plans. The service advises that Green Belt reviews should be considered in the context of its strategic role. This indicates that Green Belts should not necessarily be just reviewed for each authority, and could include a joint methodology. Ideally, the Green Belt study should be comprehensive and strategic.

3.32 The Planning Officers Society guidance states:

- **As per paragraph 79 of the NPPF** "*the essential characteristics of Green Belts are their openness and their permanence*". Although Green Belts will contain land which is of high quality in terms of valued landscapes its purpose is not to protect such features but to keep land within that designation permanently open. The guidance identifies that openness within the Green Belt should not be confused with landscape character of that area.
- Parcels of land around the inner edge of the Green Belt should be identified and delineated for assessment. To the greatest extent possible, each should have clearly defined boundaries using recognisable features.
- Any review of the Green Belt should be taken in line with the aims of the NPPF with specific emphasis on the delivery of sustainable development and supportive infrastructure. Any land which is removed from the Green Belt for development will be in locations in which the case for sustainable development outweighs the assessment of this land in terms of the five Green Belt purposes. Sustainability of these areas will need to be addressed in

terms of social (e.g. local open space provisions), economic (e.g. transport capacity) and environmental (e.g. impacts on biodiversity and efficient land use) considerations. From the consideration of these elements a new Green Belt area will emerge, and this may require expansions of the original established boundaries of the designation to compensate for any development sites which are released.

### *Inspector's Reports from Other Local Plans*

3.33 It is worth looking into some of the recently adopted Local Plans in the North West to see what stance the Inspector has taken with regards to releasing Green Belt land for future development in the area.

3.34 **In particular, we look into the Inspector's comments from the reports to the Knowsley Local Plan: Core Strategy and the Cheshire East Local Plan Strategy.**

#### *Cheshire East Local Plan Strategy*

3.35 The Inspector, in his report on the examination of the Cheshire East Local Plan Strategy (20<sup>th</sup> June 2017), believes that Cheshire East Council have provided sufficient evidence to establish the exceptional circumstances needed to justify altering Green Belt boundaries, which is:

*'Essentially based on the need to allocate sufficient land for market and affordable housing and employment development, combined with the adverse consequences for patterns of sustainable development of not doing so, since it is not practicable to fully meet the assessed development needs of the area without amending Green Belt boundaries'.*

3.36 The Inspector goes on to state that the approach to site- selection and Green Belt released should reflect national policy and other guidance in the NPPF and PPG, which provides a set of objective, **comprehensive and proportionate evidence to inform the selection of Green Belt land without 'retro-fitting' the evidence.**

3.37 **In paragraph 99 of the Inspector's Report, the CELPS-PC proposes to release some 200ha of land from the Green Belt for Safeguarded Land in the north of the Borough, which is justified in the supporting evidence. The Inspector recognises that:**

*'The overall amount of proposed Safeguarded Land is intended to meet long -term development needs stretching well beyond the end of the current plan period; in fact, taking account of other sources of land, it should be sufficient for another full 15-year period beyond 2030, so that the Green Belt boundary defined in the CELPS-PC will not need to be amended until at least 2045'.*

3.38 **Paragraph 165 of the Inspector's Report highlights that there has been some local concern with the loss of Green Belt, with national policy confirming that Green Belt should only be released in exceptional circumstances; on its own, unmet housing need does not necessarily justify the use of Green Belt land. For Cheshire East;**

*'Cheshire East Council has demonstrated the exceptional circumstances to justify using Green Belt, not only in overall terms, but also the inability of Macclesfield and the northern towns to meet their housing and employment needs without going into the Green Belt. This is due to the lack of other suitable alternatives, including existing urban and non-Green Belt sites, most of which have other development constraints; failure to meet these needs would result in unsustainable development and would not fully meet the identified overall need for housing and employment land. In total, the loss of sites in the Green belt in the CELPS-PC amounts to some 1.55% of the existing Green Belt in Cheshire East'.*

- 3.39 In summary, the Inspector has recognised that there is a need to release Green Belt land to meet the development needs of the borough. This release needs to look for the entirety of the plan period and beyond.

*Knowsley Local Plan: Core Strategy*

- 3.40 The Inspector, in his report on the examination of the Knowsley Core Strategy (24th November 2015), recognises there is a need to release Green Belt to meet the development needs within the borough. In paragraph 18 of this report, the Inspector highlights that:

*'In the longer term, when the supply of land within the urban area is exhausted, urban extensions will be required to meet the remaining housing and employment needs of the borough. Because all land outside the existing urban areas is Green Belt, these extensions involve the release of land from the Green Belt'.*

- 3.41 In paragraph 44 of his report, the Inspector highlights the principles of Green Belt release:

*'The restriction on development in the Green Belt at paragraph 14 of the Framework means that it is not sufficient to apply the usual 'planning balance' between meeting objectively assessed needs (as sought by paragraph 47) and the adverse effects of doing so. Paragraph 70 stresses the great importance attached by Government to Green Belts as a means of preventing urban sprawl by keeping land permanently open. However, paragraph 83 does allow Green Belt boundaries to be altered "in exceptional circumstances" as part of the preparation or review of a local plan. The focus is on promoting sustainable patterns of development: paragraph 84 requires consideration of the consequences of channelling development towards non-Green Belt locations, while paragraph 85 seeks (amongst other matters) consistency with the strategy for meeting identified requirements for sustainable development'.*

- 3.42 The Inspector goes on to confirm that Green Belt release is essential in this borough, with sustainability being at the forefront of this approach. The Inspector affirms:

*'Sustainability is at the forefront of the Council's approach and it has determined that Green Belt releases are a necessary component of the sustainable development of its area, as set out*

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*in Policy CS1 'Spatial Strategy for Knowsley. Alternative strategies have been tested and found to be less sustainable'.*

3.43 In order to demonstrate a five year supply of housing, the Inspector confirmed that immediate Green Belt release is necessary.

3.44 **Paragraph 54 of the Inspector's Report confirms that the Green Belt boundaries around Knowsley have remained unchanged for a number of years;**

*'It is pertinent that, in order to promote regeneration, the Merseyside Green Belt was expected to have a life-span of about 15 years when designated in 1983. However the Green Belt in Knowsley has endured largely unchanged (apart from minor boundary adjustments) since its inception, a period of 32 years'.*

3.45 In light of this, it is pertinent that the Green Belt release takes into account the long term development needs of the borough. As stated in paragraph 55;

*'Green Belt alterations should meet longer term development needs stretching well beyond the plan period, and it satisfies the "where necessary" test'.*

#### 4. WARRINGTON GREEN BELT ASSESSMENTS

4.1 The following two Green Belt Assessments are relevant to our assessment and have greatly assisted in formulating the approach and baseline position to our own assessment:

- The Green Belt Assessment carried out by Arup on behalf of Warrington Borough Council in October 2016; and
- The Green Belt Assessment (additional site assessments of Call for Sites Responses and SHLAA Green Belt Sites) in July 2017.

4.2 We summarise the approach and findings of those studies below.

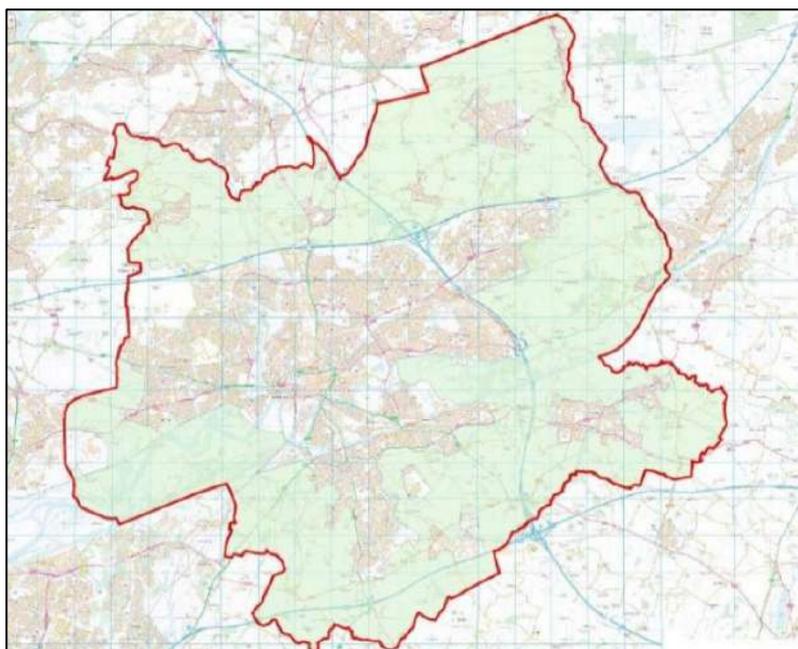
##### Warrington Green Belt Assessment (October 2016)

4.3 Arup and Partners (Arup) was appointed by Warrington Borough Council (WBC) to undertake a Green Belt assessment for the local authority area of Warrington designated by Green Belt. The aim of this Green Belt Assessment was to provide WBC with an objective, evidence based and **independent assessment of how Warrington's Green Belt contributes to the five purposes of Green Belt** set out in national policy. It is an initial assessment and there will be the need to undertake more detailed site specific assessment work as part of the Local Plan review.

##### *Study Area*

4.4 The Warrington Green Belt is contiguous with the Green Belt in Merseyside, Greater Manchester and North Cheshire. Lymm and Culcheth are the largest of the outlying settlements in the borough which are surrounded by Green Belt. The image below shows the current Green Belt, as designated by the Warrington Local Plan Core Strategy and this forms the study area for the assessment.

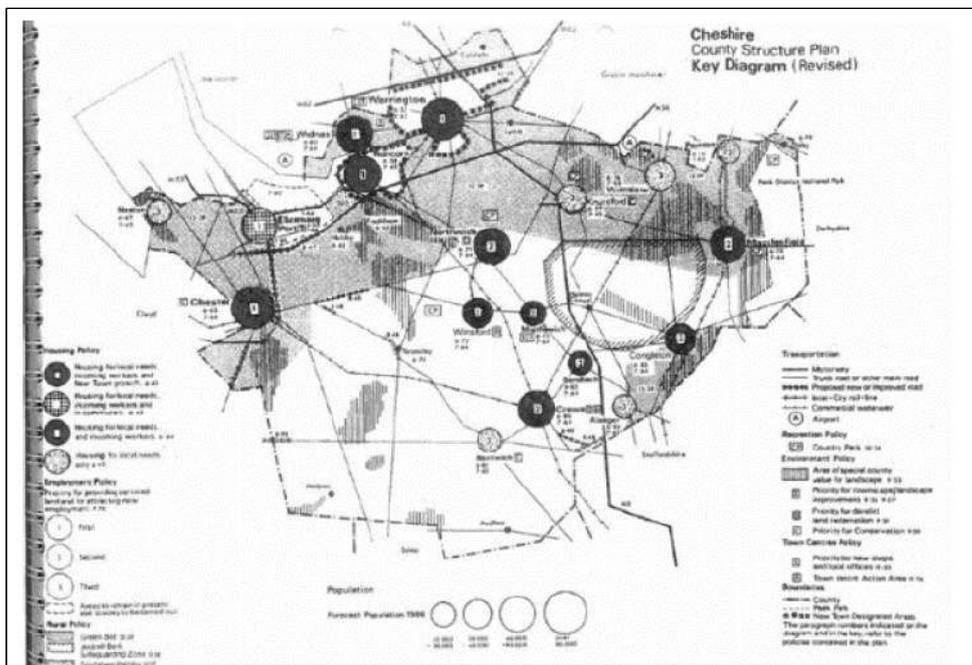
Figure 2: Warrington Green Belt Boundary taken from the Green Belt Assessment



### History of the Warrington Green Belt

- 4.5 Warrington was designated as a New Town in 1968 and unlike many new towns, it already had a distinct built-up area and town centre. The Warrington Development Corporation set out new development in four new districts around the outside of the existing town, which led to the significant increase in the population and growth in the local economy.
- 4.6 Warrington became a unitary authority in 1998 and since then, priority has shifted from expansion towards a focus on regeneration of existing urban areas. Green Belt is a key tool in achieving urban regeneration and preventing further outward expansion.
- 4.7 The New Town Outline Plan for Warrington was approved in 1973 and set out the strategy to expand **the town's population from 120,000 to 200,000 by 2000. Planning policies of restraint** were applied to villages and rural areas of the borough.
- 4.8 The Green Belt around Warrington was first formally introduced in the Cheshire Structure Plan 1977 (adopted 1979) with the extent broadly defined on the Key Diagram shown below. This set out the areas outside of the New Town Designation as being within the Green Belt, with restrictions placed upon new development. Later alterations of the Structure Plan did not change the extent of the Green Belt shown on the key diagram below.

Figure 3 – The Cheshire Structure Plan 1977 – Figure taken from Green Belt Assessment (2016)

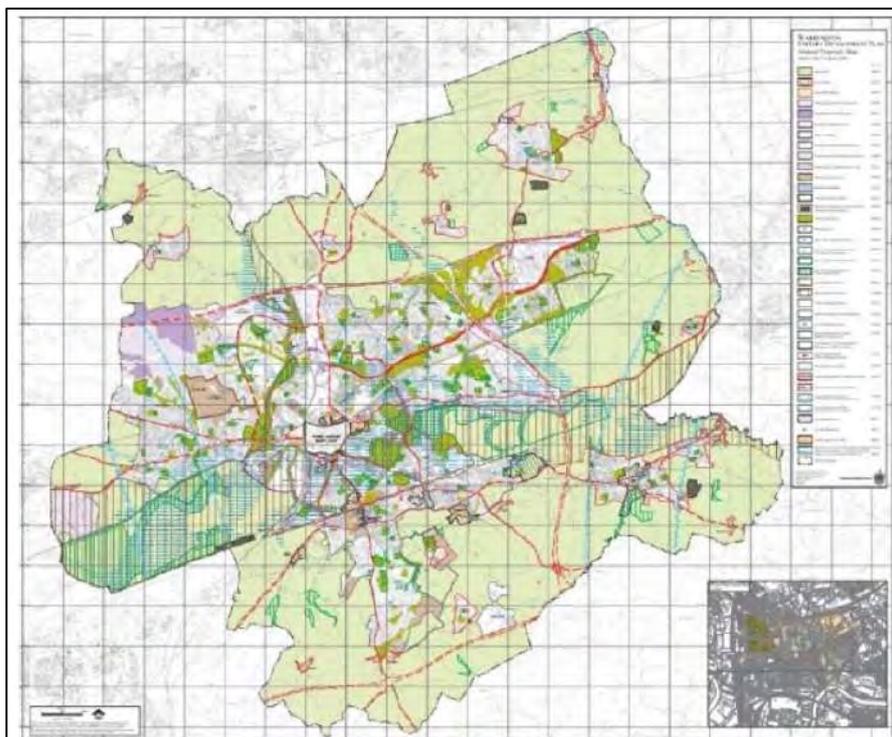


- 4.9 As a result, current Green Belt boundaries are still based upon the designation established in 1979.
- 4.10 The Unitary Development Plan (UDP) 2006 was the first single comprehensive statutory development plan for the borough and was the first plan to formally define the Green Belt. Policy

GRN1 alongside the Proposals Map shows the detailed boundaries of the Green Belt, which is copied below.

4.11 The UDP sought to concentrate new development within the new town of Warrington by maximising development on previously developed land.

Figure 4: Unitary Development Plan Proposals Map (2006)



4.12 The UDP strategy was built around two key considerations consisting of the need;

- i. *'refocus growth from the outward expansion of the new town into older, central areas of the town that were in need of investment and regeneration'; and*
- ii. *'to define for the first time the detailed Green Belt boundaries around the town and other settlements through the borough'.*

4.13 The UDP included some minor changes to the Green Belt boundary including;

- Bents Garden Centre in Glazebury which was most notably removed from the Green Belt in order to match the rest of the village;
- Land east of Barleycastle Trading Estate was put forward as an employment allocation but this was deleted by the Inspector who felt there was an adequate supply of employment land.

4.14 The Local Plan Core Strategy, adopted in July 2014, signalled a shift from the focus on outward expansion generated by the New Town agenda towards a **'regeneration first' emphasis**. This aligned

with the now revoked North West RSS which identified no strategic change to Green Belt boundaries in Warrington before 2021. Paragraph 2.8 notes;

*'Strategic planning policies sought to arrest outward growth of the Town partly through recognition that it was nearing its natural limits to expansion and partly through recognition that the New Town development had remarkably little effect on the older urban areas of Inner Warrington. Recent efforts to date have therefore focused on regenerating and 'restructuring' the older core of Warrington Town'.*

- 4.15 Section 3 of the Green Belt assessment refers to the policy context and practice guidance which has shaped the overall approach to the assessment. This Green Belt Assessment was prepared in the context of the NPPF (2012) however given that the Local Plan will be examined under NPPF 2019, this Green Belt Review will be reviewed in the context of the up to date NPPF.

#### *Arup Study Methodology*

- 4.16 In Section 4, Arup start to set out the methodology for the study. A two-stage approach was applied which is detailed below.

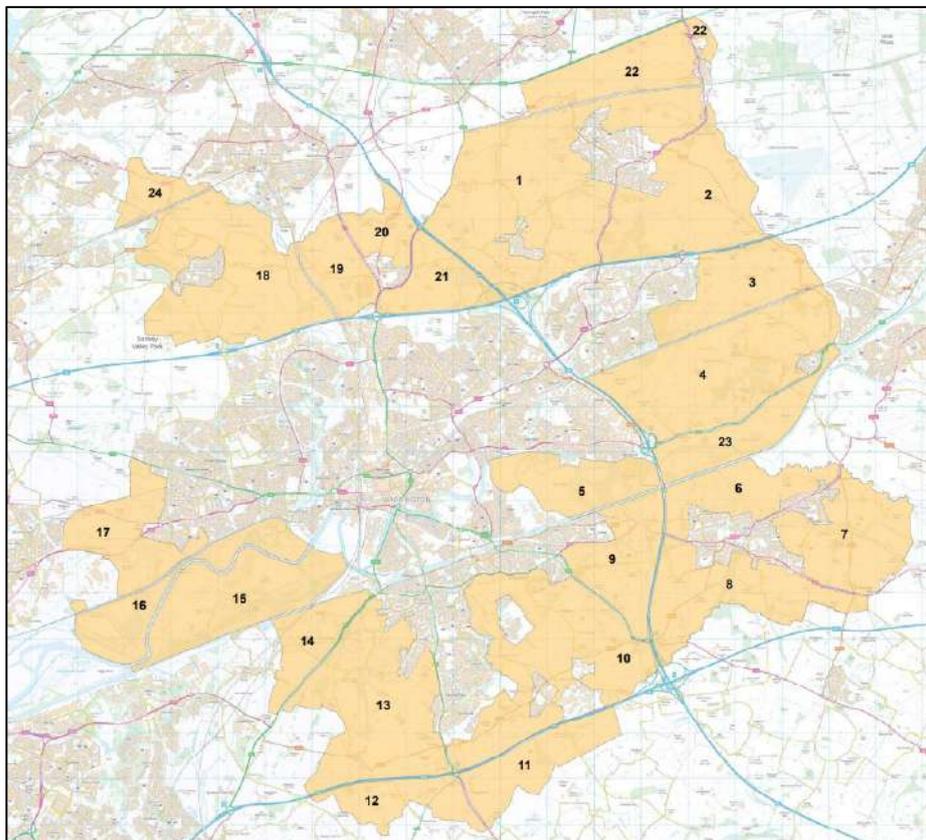
#### *Stage 1 – General Area Assessment*

- 4.17 Stage 1 of the assessment **involved dividing the entire Green Belt into large parcels 'General Areas'** which were then assessed against the five purposes of the Green Belt. The General Areas were defined using recognisable and permanent boundaries. In accordance with paragraph 85 of the NPPF, local planning authorities should define boundaries clearly using;

*'physical features that are readily recognisable and likely to be permanent'.*

- 4.18 Motorways, A roads, waterways and operational railway lines were identified as representing strong **'permanent' boundaries**. Other natural and man-made elements can also create strong boundaries, and it was decided that these elements represented the most recognisable and permanent physical features with which to divide the whole Green Belt.
- 4.19 The General Areas were defined by motorway boundaries (M6, M62, M56), A roads, main waterways (River Mersey, St Helens Canal and the Manchester Ship Canal) and railway lines (West Coast Mainline and Liverpool to Manchester line). Figure 5 below shows the 24 General Parcels which were identified as part of Stage 1 of the assessment. The Garden Settlement is located within Parcels 9 and 10. In Section 7 of this report, we provide further details on these parcels and an assessment of their contribution to the Green Belt purposes.

Figure 5: General Green Belt Areas taken from Green Belt Assessment (2016)



### *Stage 2 – Methodology*

- 4.20 Following the Stage 1 assessment, all areas of the Green Belt adjacent to inset settlements were divided into smaller Green Belt parcels. The settlement inset boundary was used to define the inner extent of the Green Belt and parcels were always drawn from the settlement boundary outwards.
- 4.21 The results from the General Area assessment were referred to in order to determine whether it was necessary to define parcels in these areas. If the General Area assessment had concluded that these General Areas made a **'weak' contribution or 'no' contribution, to Green Belt purposes, the** General Areas was divided into parcels.
- 4.22 The table below shows how parcel boundaries were defined and reflects paragraph 85 of the NPPF (or paragraph 138 of 2019 NPPF). When drawing the parcels, resulting in large expanses of countryside which was more akin to General Areas, features lacking durability were utilised in order to enable division of the Green Belt into manageable parcels.
- 4.23 The table below provides a definition of which boundaries are considered to be durable (readily recognisable and likely to be permanent) and features lacking durability (soft boundaries which are recognisable but have lesser permanence).

Table 1: Table to describe boundary definition taken from Green Belt Assessment (2016)

<p><b>Durable Features</b>  (Readily recognisable and likely to be permanent)</p>	<p>Infrastructure:</p> <ul style="list-style-type: none"> <li>• Motorway</li> <li>• Roads (A roads, B roads and unclassified 'made' roads)</li> <li>• Railway line (in use or safeguarded)</li> <li>• Existing development with clear established boundaries (e.g. a hard or contiguous building line)</li> </ul> <p>Natural:</p> <ul style="list-style-type: none"> <li>• Water bodies and water courses (reservoirs, lakes, meres, rivers, streams and canals)</li> <li>• Protected woodland (TPO) or hedges or ancient woodland</li> <li>• Prominent landform (e.g. ridgeline)</li> </ul> <p>Combination of a number of boundaries below</p>
<p><b>Features lacking durability</b>  (Soft boundaries which are recognisable but have lesser permanence)</p>	<p>Infrastructure:</p> <ul style="list-style-type: none"> <li>• Private/unmade roads or tracks</li> <li>• Existing development with irregular boundaries</li> <li>• Disused railway line</li> <li>• Footpath accompanied by other physical features (e.g. wall, fence, hedge)</li> </ul>
	<p>Natural:</p> <ul style="list-style-type: none"> <li>• Watercourses (brook, drainage ditch, culverted watercourse) accompanied by other physical features</li> <li>• Field boundary accompanied by other natural features (e.g. tree line, hedge line)</li> </ul>

*Considering the Green Belt Purposes*

4.24 In undertaking the parcel assessment, it was necessary to interpret the five purposes of Green Belt as set out in paragraph 80 of the NPPF given that there is no single 'correct' method as to how they should be applied.

- *'to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.*

4.25 A qualitative scoring system was developed for each purpose and for the overall assessment, consisting of a scale of the parcel's contribution to the Green Belt purpose, which are shown and defined in the table below.

Table 2: Qualitative scoring system to be applied against each purpose and overall taken from Green Belt Assessment (2016)

<b>Level of Contribution to Green Belt Purposes</b>
<b>No</b> – the parcel makes no contribution to Green Belt purpose
<b>Weak</b> – on the whole the parcel makes a limited contribution to an element of the Green Belt purpose
<b>Moderate</b> – on the whole the parcel contributes to a few of the Green Belt purpose however does not fulfil all elements
<b>Strong</b> – on the whole the parcel contributes to the purpose in a strong and undeniable way, whereby removal of the parcel from the Green Belt would detrimentally undermine this purpose

4.26 For Purpose 1 - To check the unrestricted sprawl of large built up areas, the following question were raised:

- *Boundary Definition:*
  - Is the parcel adjacent to the large built up area (defined as the Warrington Urban Area)?
  - Is there an existing durable boundary between the built area and the Green Belt parcel which would prevent sprawl?
- *Level of Containment:*
  - Is the parcel well connected to the built up area along a number of boundaries?
  - Would development of the parcel help 'round off' the built up area, taking into account the historic context of the Green Belt?
- *Ribbon Development:*
  - What role does the parcel play in preventing ribbon development?

4.27 For Purpose 2 - To prevent neighbouring towns merging into one another, the following questions are set out:

- Would a reduction in the gap between settlements compromise the openness of the Green Belt land?

4.28 For Purpose 3 – To assist in safeguarding the countryside from encroachment, Arup set the following questions:

- Future encroachment:

- Are there existing durable boundaries which would contain any future development and prevent encroachment in the long term?
- Existing encroachment:
  - What is the existing land use/uses? Is there any existing built form within or adjacent to the parcel?
- Connection to the countryside:
  - Is the parcel well connected to the countryside? Does the parcel protect the openness of the countryside?
  - Does the parcel serve a beneficial use of the Green Belt (NPPF para 81) which should be safeguarded?

4.29 In relation to the third bullet point and considering the 'degree of openness' of the countryside, Arup produce a further table which includes reference to the level of built form within the parcel, the extent of long-line views towards/across the site, and the scale of vegetation.

4.30 For Purpose 4 – Preserve the setting and special character of historic towns, Arup define what **they consider to be meant by the term 'historic town' and also identify other relevant context** such as conservation areas. Historic towns have been identified with reference to the Cheshire Historic Landscape Characterisation (November 2007) and the Cheshire Historic Towns Survey (2003). Warrington is considered to be a historic towns.

4.31 Four stages were identified to assess the contribution of this purpose to the Green Belt.

- Stage 1 – **Is the parcel adjacent to a 'historic town' and/or crosses an important** viewpoint of the spire of the Parish Church of St Elphins, Warrington?  
  
If not adjacent to historic towns, conclude no contribution unless it crosses a viewpoint of **the Parish Church in which case conclude 'weak contribution. If yes, undertake Stage 2.**
- Stage 2 – Identify whether there are any relevant Conservation Areas within 250m of the Green Belt parcel, as shown in the 250m buffer map below.  
  
If **outside the 250m buffer, conclude 'no contribution', unless it crosses an important viewpoint in which case 'weak contribution.** The viewpoint map is shown below.
- Stage 3 – Is there modern built development which reduces the role of the Green Belt in preserving the setting and special character?
- Stage 3A – Are there any other designated heritage assets within the 250m buffer which add to the setting and special character and/does the parcel cross an important viewpoint of the spire of the Parish Church of St Elphins, Warrington?

4.32 For Purpose 5 – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land, Arup utilised evidence prepared by the Council in relation to the brownfield capacity. Arup highlighted the level of brownfield land available and from this quantity, how much of this is unconstrained PDL.

4.33 Arup applied the following threshold to determine what contribution should be afforded to each parcel:

- No Contribution: Zero urban potential;
- Contribution: >0 – 1% urban potential;
- Significant contribution: >1% - 5% urban potential; and
- Major contribution: >5% urban potential.

4.34 The table below shows the brownfield capacity of Warrington, in comparison to the other neighbouring authorities.

*Overall Assessment*

Table 3: Brownfield Capacity taken from Green Belt Assessment (2016)

Borough/Settlement	Area (Ha)	Unconstrained PDL SHLAA Sites (only PDL) (Ha)	Unconstrained brownfield land as a % of the area	Purpose 5 Assessment
Warrington Borough	6390.18	298.72	4.67%	-
St Helens Borough	13590	238	1.75%	-
Halton Borough (Excl. Mersey)	7939.91	44.32	0.56%	-
Mid Mersey Housing Market Area	27920.09	581.04	2.08%	Moderate contribution
Irlam and Cadishead Settlement Urban Area <sup>4</sup>	527	17	3.23%	Moderate contribution

4.35 In order to ensure a consistent and transparent approach, the following guidance was used in determining the overall assessment:

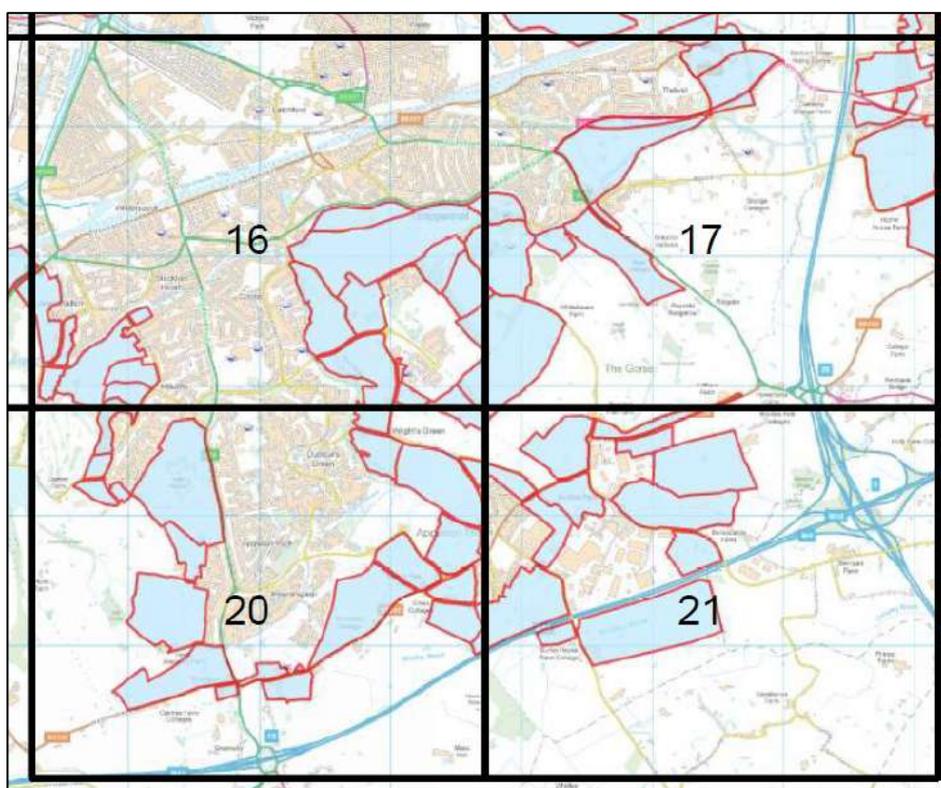
- No parcels should be assessed as 'no contribution', overall unless each of the five purposes is assessed as 'no contribution';
- Where there is a 4/1 split – the majority contribution should always be applied, unless the majority is 'no contribution', in which case, the overall should be 'weak';
- Where there is a 3/2 split – the majority contribution should always be applied unless the '2' contributions are 'strong';

- Where there is a 3/1/1 split – the majority contribution should always be applied unless one of the minority contributions is strong and one is moderate. In this case, professional judgement should be applied;
- Where there is a 2/2/1 split – the contribution to be applied depends on the split and what the minority leans towards. Professional judgement should be applied; and
- Where 2 purposes are the same and the remaining 3 are different, professional judgement should be applied.

#### *Assessment of Parcels around the Garden Settlement*

4.36 As shown in Figure 6 below, a number of parcels were identified within the Garden Settlement.

Figure 6 – Image to show the Green Belt Parcels assessed within the Proposed Garden Settlement Area



Green Belt Assessment Addendum following Regulation 18 Consultation (June 2017)

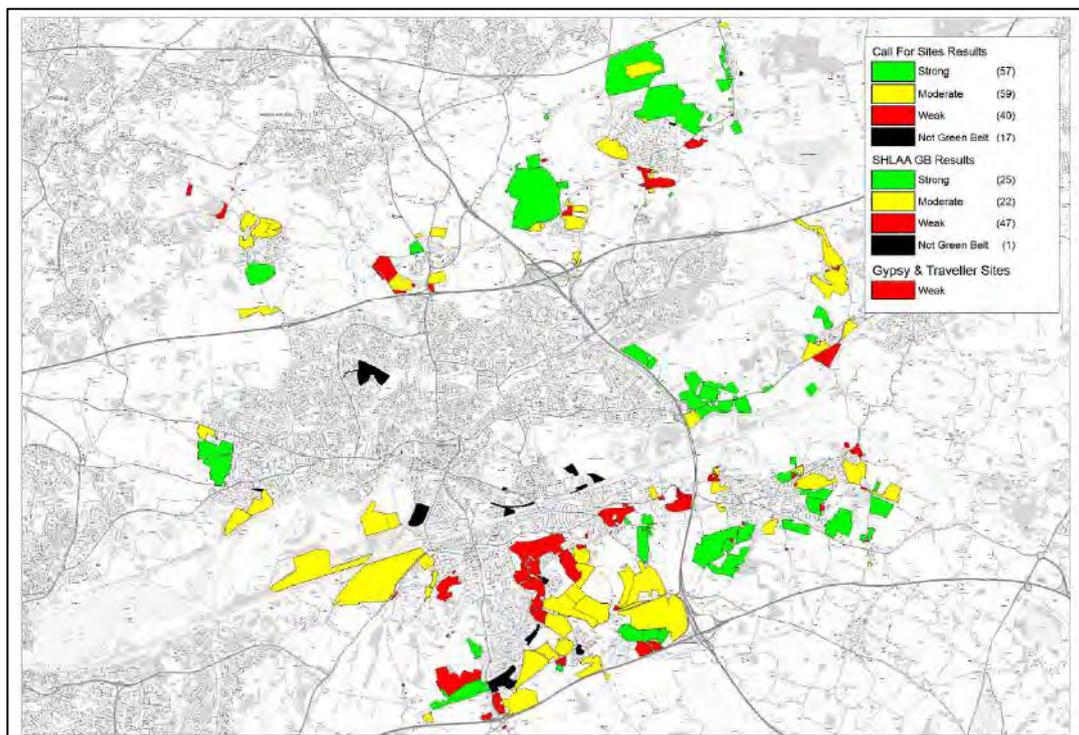
- 4.37 This Green Belt Assessment is an addendum to the Green Belt Assessment prepared in October 2016 to take into account a number of issues raised in the Regulation 18 consultation specifically relating to minor amendments required to certain parcel assessments and the implications resulting from the updated position of HS2.
- 4.38 The HS2 route is proposed to run to the west of Culcheth, through Hollins Green and then to the east of Lymm. As such, this report is not relevant to the proposed Garden Settlement.

### Warrington Green Belt Assessment (July 2017)

4.39 In July 2017, Warrington Borough Council prepared an additional Green Belt assessment to include additional site assessment of Call for Sites Responses and SHLAA Green Belt Assessments. This report will focus mainly on the parcels identified in the 2016 assessment, however reference will be made to parcels that were identified in this report, where relevant.

4.40 Below is the map taken from this report which shows the individual parcels that were assessed and how they were ranked.

Figure 7: Ranking of the Green Belt Parcels, taken from the Green Belt Assessment (2017)



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## 5. REVIEW OF RELEVANT LOCAL PLAN DOCUMENTS AND OTHER PROPOSALS

### *Warrington Local Plan Core Strategy*

- 5.1 Adopted in July 2014, the Warrington Local Plan Core Strategy is the overarching strategic policy document in the Local Planning Framework. It sets out the planning framework for guiding the location and level of development in the borough up to 2027.
- 5.2 Following its adoption, a legal challenge was made by a landowner with respect to the housing **policies contained within the Warrington Local Plan Core Strategy, in particular the Plan's housing target**. This was subsequently successful and the High Court decision in February 2015 resulted in the plan no longer having a housing target.
- 5.3 The parts of the Plan which have been overturned are:
- The housing target of 10,500 new homes (equating to 500 per year) between 2006 and 2027; and
  - References to 1,100 new homes at the Omega Strategic Proposal.

### *Emerging Local Plan*

- 5.4 WBC are in the process of preparing their Local Plan. The Submission Version of the emerging Local Plan was published in April 2019. This draft of the Local Plan will establish the new housing and employment land requirements of the Borough from 2017-2037. It also provides guidance on the location and distribution of new development over the plan period.
- 5.5 The Local Development Scheme (published in March 2019) confirms that the Plan is expected to be submitted to the Secretary of State in October 2019, with an Examination in Public expected in January/February 2020 and an estimated date of adoption in December 2020. We have detailed the relevant planning policies below.
- 5.6 Policy DEV1 Housing Delivery confirms that over the 20 year plan period from 2017 to 2037, a **minimum of 18,900 new homes will be delivered to meet Warrington's housing needs and support its economic growth aspirations**. This equates to an average of 945 homes per annum.
- 5.7 In terms of the housing distribution, the majority of new homes will be delivered within the existing main urban area of Warrington, the existing inset settlements and other sites identified in the Council's **Strategic Housing Land Availability Assessment (SHLAA)**, which have identified a capacity for a minimum of 13,726 new homes.
- 5.8 The following sites will be removed from the Green Belt and allocated as sustainable urban extensions to the main urban area of Warrington:
- Garden Suburb – minimum capacity of 6,490 homes of which a minimum of 4,201 homes will be delivered in the plan period. This is in addition to the 930 homes within the

allocation which already have consent and are included in the capacity of the existing urban area; and

- South West Extension – minimum capacity of 1,631 homes to be delivered in full in the Plan Period.

5.9 Policy GB1 Green Belt **states that the Council will maintain the general extent of the Borough’s** Green Belt, as defined on the Local Plan Policies Map, throughout the Plan Period and to at least 2047. The following land has been removed from the Green Belt and the amended Green Belt boundaries;

- Warrington Waterfront;
- Garden Suburb;
- South West Extension; and
- Land at Burtonwood/Croft/Culcheth/Hollins Green/Lymm/Winwick.

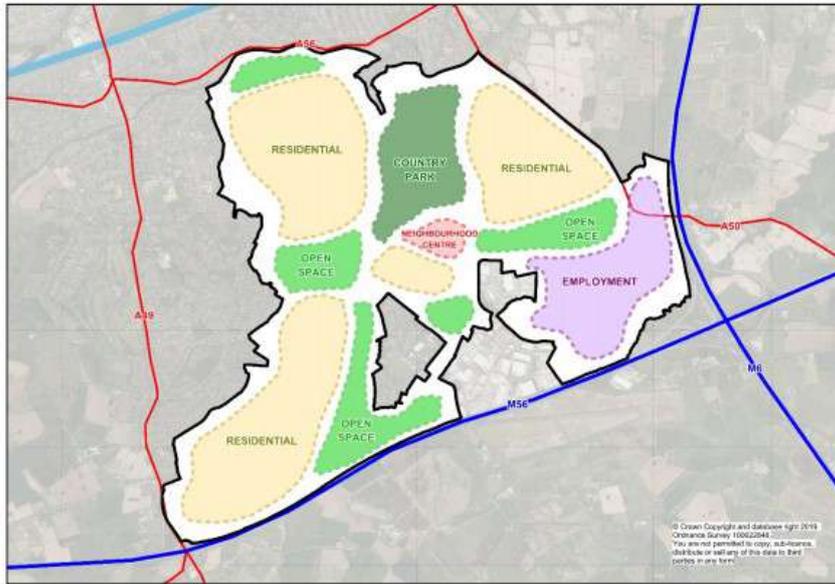
5.10 Policy MD2 Warrington Garden Suburb sets out the key requirements for the development of the Garden Suburb. The Garden Suburb will deliver approximately 7,400 homes and 116 hectares of employment land. Approximately 5,100 homes and all of the employment land will be delivered within the Plan Period.

5.11 The Garden Suburb will comprise three Garden Villages, a central Neighbourhood Centre, a significant employment zone and an extensive infrastructure network of open spaces and parkland as illustrated in the Development Concept Diagram in Figure 8 below. New homes will be delivered in the Garden Suburb across the following locations:

- 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
- d) Garden Suburb Neighbourhood – approximately 700 homes (500 within the Plan Period).

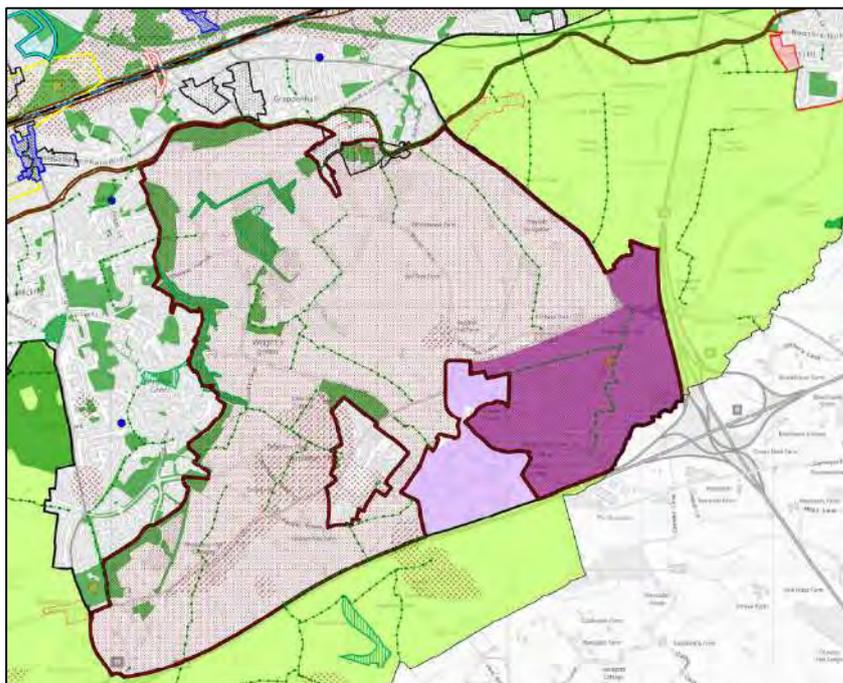
5.12 The Garden Suburb will be supported by a wide range of infrastructure, including; an additional 7 forms of entry of Primary School Provision, a new secondary school, a neighbourhood centre, three local centres, a country park, play pitches, open space, a recycling centre and transport improvements.

Figure 8 – Illustrative Development Concept for Garden Suburb



5.13 The Green Belt boundary to the south of the Garden Suburb is defined by the M56 and to the east predominantly by the A50 (Knutsford Road). Development at the eastern and southern extents of the Garden Suburb will be required to respect the Green Belt boundary. The proposed policy map is shown in Figure 9 below and shows where the Green Belt boundaries will be amended.

Figure 9 – Draft Policies Map to show the amended Green Belt boundaries



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6. PEGASUS GREEN BELT REVIEW OF GENERAL AREAS – STAGE 1

- 6.1 Warrington Borough Council are looking to release Green Belt to accommodate the future housing and employment needs of the borough for the plan period and beyond. The Council are proposing to identify Green Belt release for the allocation of Garden Suburb and therefore to identify the appropriate location for this proposed Garden Suburb, we have conducted our own Stage 1 Green Belt Assessment in line with the methodology set out by Arup. As part of this Green Belt assessment, we have reviewed the Stage 1 Green Belt assessment which identifies 24 General Areas. Given the scale proposed of the Garden Suburb, we believe that a high level review of these 24 General Areas is required to advise on the most appropriate and suitable location to accommodate this scale of development.
- 6.2 As such, the following sections of this report will set out the methodology we have used, the ratings given for the General Areas and our conclusions/findings as to where we consider the most appropriate locations for a Garden Suburb would be. The Council have identified General Areas 9 and 10 to accommodate the Garden Suburb.
- 6.3 As described in Section 4 of this report, Stage 1 of the Green Belt assessment (October 2016) involved the division of the entire Warrington Green Belt into large strategic **parcels or 'General Parcels'**. Overall, 24 'General Areas' or Strategic Parcels were identified. We have prepared a proforma for each of the General Areas (1-24) which is included at Appendix 1. Once the General Parcels were established, they were rated in terms of their contribution to the Green Belt purposes. The proformas in Appendix 1, review the rating provided by Arup and provide a comment on our own rating.
- 6.4 We have set out the baseline position for our assessment in the preceding Sections of this report and all of this detail has influenced the end results when assessing the Green Belt parcels.

*Pegasus Approach*

- 6.5 In terms of our approach to this assessment, we have:
- Utilised 24 General Areas as identified in the 2016 Warrington Green Belt Assessment **prepared by Arup so we can make direct comparisons with Arup's assessment.**
  - **We have assessed the 5 purposes of the Green Belt in line with Arup's methodology in the main.**
  - In relation to purpose 1, we agree with the approach and the methodology in the main however we have raised some concerns with how this has been applied and the ratings which have been applied. Where deemed necessary, we have provided our own comments. That said, this purpose of the Green Belt is to check the unrestricted sprawl of urban areas. In considering Green Belt parcels as part of a Local Plan process, that approach to **Green Belt release does not result in 'unrestricted sprawl'. Instead, Green Belt release through a Local Plan directly relates to 'planned growth'.**

- **In relation to purpose 2, we also largely agree with Arup's approach and methodology.** Where deemed necessary, we have provided our own comments. We have noted where it would be best to strategically place development around Warrington where it would have the least impact on this purpose. As will be seen in Appendix 1, we have some significant concerns with some parts of the Green Belt in Warrington as there are issues with associated with the merging and coalescence of settlements.
- **In relation to purpose 3, we agree with Arup's approach and methodology in the main and agree that the key consideration is what role the parcel has in maintaining the openness of the countryside/Green Belt.** However, in reference to paragraph 141 of the NPPF and the emphasis on LPAs positively seeking to enhance the beneficial use of the Green Belt, we do consider further weight and distinction between parcels can be made by considering what contribution the parcel makes in terms of:
  - allowing for public access to open countryside (i.e. via public footpaths, bridleways or public open space);
  - outdoor sports and recreation (e.g. playing pitches, golf courses, equestrian uses, etc);
  - the quality of the landscape (e.g. does the parcel fall within a Local Landscape Designation);
  - visual amenity issues (e.g. does the parcel make a positive contribution to the gateway of the settlement, contain TPOs, or provide other distinct visual amenity qualities); and
  - biodiversity issues (e.g. any national or local ecological designations).

**Indeed, all of the above will influence the public's relationship with the Green Belt and contribute to the health and well-being of a community.**

- **In relation to purpose 4, we agree with Arup's approach.** With some parcels, this is particularly prevalent due to the relationship with Conservation Areas in and around Warrington. Added to this, Warrington is a historic town and from some parcels, there are to the Parish Church which is located in the centre of Warrington Town Centre. In some case, we have re-scored the Green Belt contribution on this basis.
- In relation to purpose 5, Arup rank all sites equally in this regard. However, given this rating is based on findings from the Mid Mersey Housing Market assessment, we consider it pertinent for each local planning authority to undertake their own assessment and subsequently assess each settlement individually.

6.6 Our detailed assessments of the individual parcels are contained in the General Areas proformas at Appendix 1. We **set our comments and ranking of each Green Belt purpose alongside Arup's comments. Where we agree with Arup's comments, we simply say 'Agree'. Where we have a difference of opinion, we state 'Disagree'. And then explain why. Where we have an additional point**

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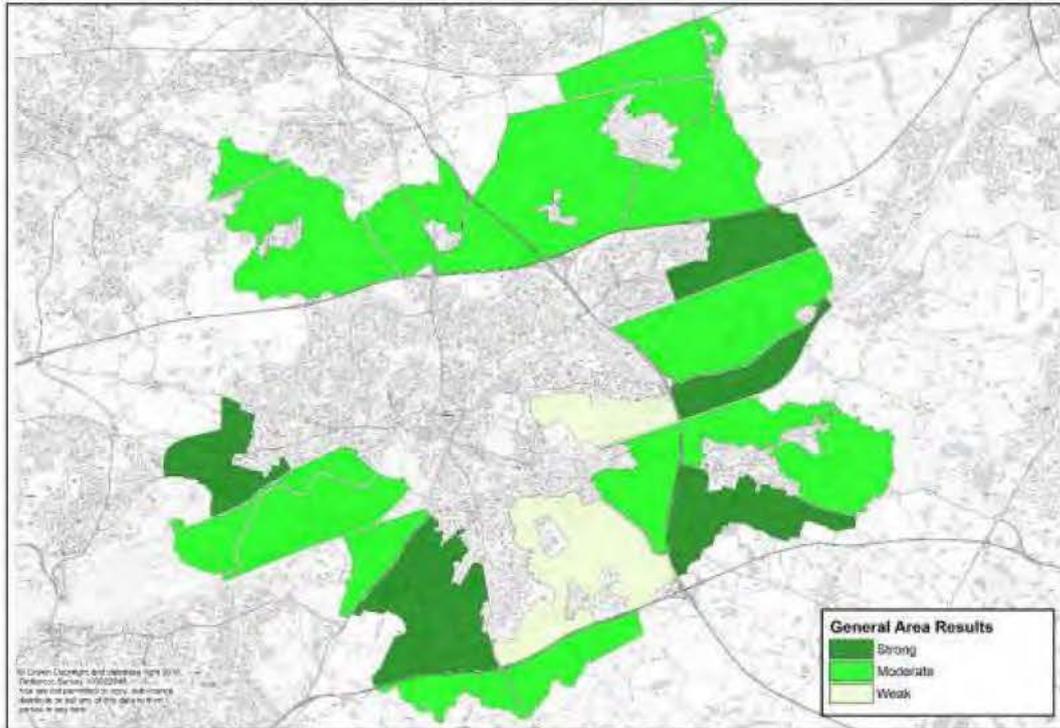
to make, we say 'Largely Agree' or 'Agree' and make the additional points. This approach ensures that it is easy to see where differences arise.

- 6.7 We have applied the same categories of 'Strong Contribution', 'Moderate Contribution', 'Weak Contribution' and 'No Contribution' and colour coded these accordingly on the proforma, again so any differences between the assessments can be easily found,

**7. RESULTS OF PEGASUS GREEN BELT ASSESSMENT**

7.1 The result of our assessment in relation to each of the 24 Green Belt General Areas identified by Arup are summarised in the tables below. A separate summary table is provided for each of the five Green Belt purposes, followed by an overall final conclusions table. Figure 10 below is a choropleth map which shows the overall results of the Arup rating.

**Figure 10 – Choropleth Map to show Arup’s Overall Ratings for the General Areas**



7.2 A detailed assessment of each General Area is set out in the Site Proformas at **Appendix 1**.

7.3 The table below is a key to explain the abbreviations in the table.

Abbreviation	Meaning
NC	No Contribution
WC	Weak Contribution
MC	Moderate Contribution
SC	Strong Contribution

**Table 4 – Conclusions: check the unrestricted sprawl of large built up areas**

General Area Ref	Arup Contribution	Pegasus Contribution	Summary Reason for Difference
1	MC	MC	
2	MC	MC	
3	SC	SC	
4	MC	MC	
5	WC	WC	
6	NC	NC	
7	NC	NC	
8	NC	NC	
9	MC	WC	Strong, permanent boundaries which would prevent sprawl
10	WC	WC	
11	NC	NC	
12	NC	NC	
13	SC	SC	
14	MC	SC	Sprawl would occur with the neighbouring authority of Halton as opposed to Warrington
15	WC	MC	Increase built up area which will sprawl towards Halton
16	MC	MC	
17	SC	SC	
18	MC	SC	Sprawl or urban area with St Helens. Non-durable boundaries to prevent sprawl
19	MC	SC	Boundaries have already been breached and this GA prevents further sprawl
20	NC	WC	Potential sprawl into large built up area of St Helens
21	MC	SC	Sprawl of the built up area of St Helens
22	NC	WC	Contribute towards the sprawl of Leigh and Lowton
23	WC	MC	Urban area already located in north western corner
24	NC	WC	Sprawl of built up area of St Helens

**Table 5 - Conclusions: prevent neighbouring towns merging into one another**

General Area Ref	Arup Contribution	Pegasus Contribution	Summary Reason for Difference
1	SC	SC	
2	SC	SC	
3	SC	SC	
4	SC	SC	
5	WC	MC	Reduction in the gap between Warrington and Lymm
6	MC	MC	Reduction in the gap between Warrington and Lymm
7	NC	WC	Reduction in the gap between Lymm and Altrincham
8	MC	MC	
9	MC	MC	
10	NC	NC	
11	NC	NC	
12	NC	NC	
13	WC	MC	Merging of Higher Walton, Daresbury, Hatton and Stretton.
14	MC	SC	Merging of Warrington with Moore
15	SC	SC	
16	MC	MC	
17	SC	SC	
18	SC	SC	
19	WC	MC	Coalescence issues between Vulcan and Newton-le-Willows
20	WC	MC	Merging/reduction of gap between Winwick and Newton-le-willows
21	WC	MC	Coalescence of Winwick Quay and Houghton Green
22	MC	MC	
23	SC	SC	
24	SC	SC	

**Table 6 - Conclusions: assist in safeguarding the countryside from encroachment**

General Area Ref	Arup Contribution	Pegasus Contribution	Summary Reason for Difference
1	MC	MC	
2	MC	MC	
3	SC	SC	
4	MC	SC	Opportunities to access the open countryside and limited built form. Good connection to the open countryside
5	MC	SC	Opportunities to access the countryside and connection to the wider countryside
6	SC	SC	
7	SC	SC	
8	SC	SC	
9	SC	SC	
10	WC	WC	
11	SC	SC	
12	SC	SC	
13	SC	SC	
14	SC	SC	
15	MC	MC	
16	WC	WC	
17	MC	MC	
18	MC	MC	
19	MC	MC	
20	SC	SC	
21	MC	MC	
22	SC	SC	
23	SC	SC	
24	MC	SC	Opportunities to access open countryside and long line views

**Table 7 - Conclusions: to preserve the setting and special character of historic towns**

General Area Ref	Arup Contribution	Pegasus Contribution	Summary Reason for Difference
1	NC	NC	
2	NC	NC	
3	NC	NC	
4	NC	NC	
5	NC	NC	
6	MC	MC	
7	SC	SC	
8	MC	MC	
9	WC	WC	
10	WC	WC	
11	NC	NC	
12	MC	MC	
13	NC	NC	
14	NC	NC	
15	NC	NC	
16	NC	NC	
17	NC	NC	
18	WC	WC	
19	WC	WC	
20	NC	NC	
21	NC	NC	
22	NC	NC	
23	NC	NC	
24	NC	NC	

**Table 8 - Conclusions: assist in urban regeneration/recycling of derelict-urban land**

General Area Ref	Arup Contribution	Pegasus Contribution	Summary Reason for Difference
1	MC	MC	
2	MC	MC	
3	MC	MC	
4	MC	MC	
5	MC	MC	
6	MC	MC	
7	MC	MC	
8	MC	MC	
9	MC	MC	
10	MC	MC	
11	MC	MC	
12	MC	MC	
13	MC	MC	
14	MC	MC	
15	MC	MC	
16	MC	MC	
17	MC	MC	
18	MC	MC	
19	MC	MC	
20	MC	MC	
21	MC	MC	
22	MC	MC	
23	MC	MC	
24	MC	MC	

**Table 9 - Overall Contribution to the Green Belt**

General Area Ref	Arup Contribution	Pegasus Contribution	Summary Reason for Difference
1	MC	SC	Significant concerns with the merging of towns and limited room for future expansion in this area of Warrington
2	MC	SC	Significant concerns with the merging of towns and limited room for future expansion in this area of Warrington
3	SC	SC	
4	MC	SC	Significant concerns with the merging of towns and limited room for future expansion in this area of Warrington
5	WC	MC	SSSI within the GA and opportunities to access the countryside. Gap between settlements would also be reduced
6	MC	MC	
7	MC	SC	Concerns with encroachment into the countryside due to the boundaries (particularly to the east) which is well connected to the countryside
8	SC	SC	
9	MC	MC	
10	WC	WC	
11	MC	MC	
12	MC	MC	
13	SC	SC	
14	MC	SC	Preventing the sprawl of neighbouring authority of Halton and weak western boundary which wouldn't prevent encroachment into countryside
15	MC	SC	Significant concerns with the coalescence of settlements
16	MC	MC	
17	SC	SC	
18	MC	SC	Significant concerns with the coalescence of Warrington, Burtonwood, Collins Wood and Newton-le-Willows
19	MC	SC	Significant concerns with coalescence and urban sprawl
20	MC	SC	Significant concerns with coalescence and urban sprawl
21	MC	SC	Significant concerns with coalescence and urban sprawl
22	MC	MC	

23	SC	SC	
24	MC	SC	Coalescence of settlements and impact on the countryside setting

### Summary of the Arup Ratings in Comparison to the Pegasus Ratings

7.4 Below, we provide a summary table of the General Area reference provided by Arup in comparison to Pegasus Group’s assessment.

**Table 10 – Summary Table to compare the differences between Arup and Pegasus Group’s Rating**

Level of Contribution	Arup’s General Area Reference	Pegasus’ General Area Reference
Strong Contribution	3, 8, 13, 17, 23	1, 2, 3, 4, 7, 8, 13, 14, 15, 17, 18, 19, 20, 21, 23, 24
Moderate Contribution	1, 2, 4, 6, 7, 9, 11, 12, 14, 15, 16, 18, 19, 20, 21, 22, 24	5, 6, 9, 11, 12, 16, 22
Weak Contribution	5, 10	10
No Contribution		

7.5 As shown in the Table 10, Pegasus Group have altered some of the ratings of the overall contributions of the General Areas in comparison to the rating provided by Arup. Table 10 provides a summary of these changes.

7.6 In terms of the overall contribution, none of the General Areas were considered by Arup or Pegasus Group to have ‘no contribution’ to Green Belt purposes.

7.7 Arup considered two General Areas to have a weak contribution to Green Belt purposes however we consider this to be one area (General Area 10) as opposed to two areas (General Areas 5 and 10). Although we do acknowledge that General Area 5 is surrounded by existing built form and development, we consider this General Area (GA) to have a strong contribution to Purpose 3 which would overall merit this GA having a strong contribution to Green Belt purposes. The SSSI Woolstan Woods is located within this GA as well as Paddington Meadows. As well as this, there are footpath connections through this GA to the Manchester Ship Canal and the River Mersey. These provide significant opportunities for local residents to access the open countryside and therefore in line with the methodology provided by Arup, we consider this General Area to have an overall moderate contribution to Green Belt purposes.

- 7.8 General Area 10 has a weak contribution to Green Belt purposes which will be described in more detail in Section 8 of this report. There is a significant amount of development within and surrounding the General Area and therefore the GA is more characteristic of the built environment as opposed to the countryside. Furthermore, the General Area is bound by strong durable boundaries and detached from neighbouring towns and settlements.
- 7.9 Pegasus Group consider 16 General Areas to have a strong contribution to Green Belt purposes and therefore we suggest that these areas are avoided to accommodate large scale development and Green Belt release. These General Areas contribute the most to Green Belt purposes and therefore would have the most impact should they be released from the Green Belt.
- 7.10 There are 7 remaining General Areas are considered overall to have a moderate contribution to Green Belt purposes. We recommend that the General Areas which are located adjacent to the weak General Areas are considered in the first instance for Green Belt release given that they are in close proximity to areas which have a weak contribution to Green Belt purposes.
- 7.11 General Areas 11, 12 and 22 have a moderate contribution to the Green Belt however these areas are not considered to be the most appropriate for future growth in Warrington. These General Areas are detached from the main built up area of Warrington and in terms of planning for the future growth of Warrington, we suggest that locations which are attached the existing urban edge of Warrington are considered in the first instance as a sustainable urban extension. These General Areas are disconnected from the services, infrastructure and development within the main urban area and therefore we do not consider these to be the best or most obvious locations for the development of a Garden Suburb.
- 7.12 As will be described in detail in Section 9 of this report, General Area 16 is adjacent to the neighbouring authority of Halton and we have some concerns with the coalescence of settlements in this location. Furthermore, given the General Area boundaries (the railway line to the north and the River Mersey to the south), this General Area is an odd shaped GA which would not be capable of delivering large scale development and as well as this, it would present some issues in accessing this area.
- 7.13 General Areas 5 and 6 present significant opportunities to access the open countryside. As noted above, General Area 5 contains Woolstan Woods (SSSI), Paddington Meadows as well as a number of pedestrian links and public rights of way. General Area 6 includes Lymm Golf Club, Sow Brook playing fields and a pedestrian link between the Manchester Ship Canal and the settlement of Warrington. There is very little built form within the GA and therefore this General Area is considered to be characteristic of the open countryside. The General Area has strong degree of openness. On this basis, we do not consider these General Areas to be the most suitable for future growth.
- 7.14 General Area 9 is located adjacent to GA 10 (which has a weak contribution to Green Belt purposes). **Although there are PRow's** within the GA, the majority of the footpaths in the southern section

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appear to be unused and do not link up to other areas. There is a significant amount of built form within the northern section of the GA and therefore this does affect the character and setting of the open countryside. Furthermore, this General Area is adjacent to GA 10 which is considered to have a weak contribution to Green Belt purposes and therefore this GA would be the most obvious choice for future growth after GA 10.

8. DETAILED ANALYSIS OF GENERAL AREAS 9 AND 10

8.1 We now focus specifically on General Areas 9 and 10 which make up the proposed Garden Suburb area and provide a more detailed summary on these General Areas. Figure 11 provides an aerial image of General Areas 9 and 10.

Figure 11 – **Aerial Image to show 'General Areas' 9 and 10**



General Areas 9

*General Description*

8.2 This GA comprises of 358 hectares of predominantly agricultural land to the south east of the town centre of Warrington. The GA is bound by the M6 to the east, Cliff Lane to the south, Knutsford Road, the existing urban edge of Thelwall and Bell Lane to the west and the Manchester Ship Canal to the north. There is an A Road (A56 Stockport Road) B Road (B5157 Lymm Road) and other minor access within this GA. In the northern part of this GA, there is existing built form in the form of residential dwellings, Chaigeley School, a riding centre, a gun club, a recycling centre, car repairs garage, Stretton Old Hall etc. Within this built form, there are a number of Grade II listed buildings. In terms of natural features, the Bridgewater canal runs through the northern section of the GA in between Stockport Road and Weaste Lane running from east to west. There are a large number of small ponds within the GA and Thelwall Brook.

*Purpose 1: To check the unrestricted sprawl of large built-up areas*

- 8.3 Arup Rating – Moderate Contribution: Bell Lane and Stockport Road (A56) form the western boundary of the GA with the built up area and represent durable boundaries which could prevent sprawl. The GA is only connected to the built up area along the western boundary. There is significant existing ribbon development along Weaste Lane and Stockport Road and the GA plays a strong role in preventing further ribbon development. Overall the GA makes a moderate contribution to checking unrestricted sprawl.
- 8.4 Pegasus Rating – Weak Contribution: Pegasus consider this GA to have a weak contribution to this purpose as opposed to moderate. The existing boundary between the built up area and the GA comprises Bell Lane and Stockport Road which are durable boundaries preventing unrestricted sprawl and thus making a weak contribution to this purpose in this regard. The GA is connected to the existing built up area along the western boundary and overall, the GA is well contained by strong, durable and permanent boundaries. There is a good opportunity/potential for this GA to **'round off' development given that there is a significant amount of existing development along Stockport Road, Lymm Road and Bell Lane** and therefore the more permanent and durable boundary of the M6 to the east of the GA would make a logical and durable boundary to prevent future urban sprawl to the east. The GA is bound by strong, durable boundaries, in particular to the north (Manchester Ship Canal) and the east (M6). Such durable features, such as these, would prevent the unrestricted sprawl of the urban area. Although there is existing ribbon development within the GA, this is limited to the north section of the GA and therefore this is not considered to make a stronger contribution to this purpose.

*Purpose 2: To prevent neighbouring merging into one another*

- 8.5 Arup Rating – Moderate Contribution: The GA forms a largely essential gap between the Warrington urban area and Lymm whereby a reduction in the gap would significantly reduce the actual distance between the towns albeit would not result in them merging. Furthermore the M6 ensures that separation is retained. Overall the GA makes a moderate contribution to preventing towns from merging.
- 8.6 Pegasus Rating – Moderate Contribution: Pegasus disagree with the Arup rating and consider this GA to have a weak contribution to this purpose overall. The A56 Stockport Road runs from Grappenhall, through the settlement east to west, over the M6 motorway and then into Lymm. When travelling along this road and crossing over the motorway, there is a real sense of leaving one settlement and then entering another settlement. The development of GA 9 would not reduce this sense of leaving one settlement and entering into a new settlement. Similarly, within GA 9, there is existing built form along the eastern boundary with the M6 and therefore the development of this GA would not reduce the gap any more than what already exists. As shown in Figure 12 below, the existing gap between the existing development associated with the urban area of Warrington and Lymm is approximately 102m. The development of this GA would not reduce the gap to any less than this existing gap. Furthermore, the durable and permanent boundary of the

M6 would definitely prevent the merging of the Warrington urban area and Lymm and therefore this GA is considered to have a weak contribution overall to this purpose.

Figure 12 – Aerial Image to show the gap between the existing development in Warrington and Lymm



*Purpose 3: To assist in safeguarding the countryside from encroachment*

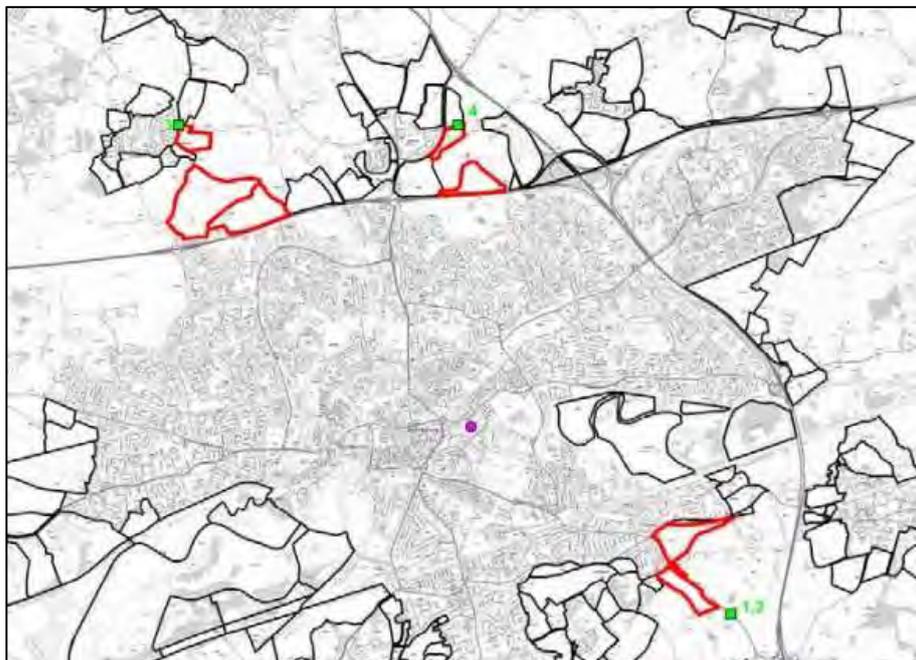
- 8.7 Arup Rating – Strong contribution - There are durable boundaries between the built up area and the GA which could prevent encroachment. The M6 forms a durable boundary between the GA and the countryside which could prevent encroachment beyond the GA if the GA were developed. The existing land use consists predominantly of open countryside with sparse farm buildings albeit the washed over village of Weaste Lane is located to the western edge of the GA. The GA is well connected to the open countryside along three boundaries and plays a strong role in safeguarding it from encroachment. Overall the GA supports a strong degree of openness given there is less than 10% built form and low level vegetation. Overall the GA makes a strong contribution to safeguarding from encroachment.
- 8.8 Pegasus Rating - Strong Contribution – The northern part of GA 9, in particular, contains a significant amount of built form and thus when travelling along these roads, there is a very limited sense of being within the open countryside. We do however acknowledge that there is limited built form within the southern section of this GA with only a few examples of built form in the southern section of the GA located along Knutsford Road, Cliff Lane and Weaste Lane. Having said that, we do not consider the southern section of this GA to be significant in providing access to the open countryside. In terms of beneficial uses of the GA, there are a number of public rights of way within the GA but the majority of these are located within the northern section, from Weaste Lane northwards and within/surrounding the extensive built form. There are two public rights of way

running north to south in the southern section of the GA **however these don't appear to be as** trodden or well used as the footpaths in the northern GA. Furthermore, the public footpaths within the southern section of this GA do not link to a wider PRoW network and does not link to any recreational areas. It is recognised that there are some PRoW within the northern section of the GA that link over the motorway to Lymm and to the Manchester Ship Canal to the north however as described above, the northern section of the GA is dominated by built form and therefore is not characteristic of the open countryside. In terms of recreational uses within the GA, there are a few opportunities, including; Elizabeth Park and Statham Lodge Riding Centre in the northern section and the Bridgwater Canal within the centre of the GA. The GA does have some long line views into the open countryside within a strong degree of openness however similarly, there are sections of the GA where there is no degree of openness and no long line views into the open countryside. As such, when taking a balanced view of the above, the GA overall is considered to have a strong contribution to Purpose 3.

*Purpose 4: To preserve the setting of special character of historic towns*

- 8.9 Arup Rating – Weak Contribution - Warrington is a historic town. The GA crosses an important viewpoint of the Parish Church although it is separated from the historic centre of Warrington and it is not within 250m of the Warrington Town Centre Conservation Areas. The GA therefore makes a weak contribution to this purpose.
- 8.10 Pegasus Rating – Weak Contribution – As stated above, Warrington is recognised as a historic town and therefore should be afforded weight in Green Belt terms. The map in Figure 13 below shows the important views of the Parish Church which is relevant to this GA. Having said that, the GA is not within close proximity to any Conservation Areas and therefore overall, the GA make a weak contribution to this purpose.

Figure 13 – Map to show the viewpoints from the Parish Church (Appendix C)



*Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land*

- 8.11 Arup Rating - Moderate Contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the GA makes a moderate contribution to this purpose.
- 8.12 Pegasus Rating – Moderate Contribution – Firstly, it is worth noting that all **GA's** have been rated the same in this regard. As stated within the Stage 1 assessment, Warrington has 298.72 hectares of unconstrained previously developed PDL SHLAA sites. As recognised within the consultation document, **Green Belt land is required to meet the borough's housing needs and** therefore although we do not disagree with this overall rating, Green Belt land is required for the future housing and employment needs of the borough. There is very limited brownfield land to the south of Warrington and therefore although we agree with this rating, Green Belt land will need to **be released to accommodate the borough's housing need.**

*Overall Assessment*

- 8.13 Arup Rating - Moderate Contribution - The GA makes a strong contribution to one purpose, a moderate contribution to three and a weak contribution to one. Professional judgement has been applied and the GA has therefore been judged to make a moderate overall contribution to the Green Belt. Although the GA makes a strong contribution to safeguarding from encroachment due to its strong degree of openness, it has generally durable boundaries and also makes a weak contribution to preserving the setting of historic towns.

- 8.14 Pegasus Rating – Moderate Contribution– We consider this GA to have an overall moderate contribution to this purpose. We do not consider the GA to have a strong contribution to Purpose 3. Although the GA does have a moderate contribution in terms of its contribution to preventing the countryside from encroachment, the GA is defined by strong, permanent, durable boundaries that would prevent urban sprawl and the merging of towns into one another.

General Area 10

*General Description*

- 8.15 The GA comprises approximately 923 hectares of agricultural land to the south east of the town of Warrington. The GA sits adjacent to the settlements of Appleton (to the west) and Grappenhall (to the north). The GA is predominantly made up of green fields however the Green Belt GA has been drawn around clusters of built form, including the settlements of Grappenhall Hays, Appleton Thorn and the Stretton Green Distribution Park/Barleycastle Trading Estate/Appleton Thorn Trading Estate. Built form within the GA **includes; St Wilfred’s Primary School, Grappenhall Scout Centre,** pubs, Old Rectory Nursing Home, farms, Applejacks Adventure Farm, Park Royal Hotel, **St Matthew’s church and primary school and some residential dwellings.** The GA is bound by the M6 to the south, the M6 slip road/Knutsford Road (A50) to the east, the existing urban edge of Grappenhall to the north and the A56 to the north and the existing urban edge of Appleton to the west. The GA contains 3 scheduled ancient monuments, including; Bradley Hall moated site and two separate sections of Roman road between Appleton and Stretton. There are a number of Grade II listed buildings within the GA as well as a Grade II\* listed building located 90m from the southern boundary of the GA (Tanyard Farm Farmhouse). There a range of different roads running throughout the GA, including; B5356 (Stretton Road) and some smaller, more minor access roads. There are a number of dense wooded areas within the GA as well as smaller streams and watercourses.

*Purpose 1 – To check the unrestricted sprawl of large built-up areas*

- 8.16 Arup Rating – Weak Contribution - The A56 and the canal form a durable northern boundary between the GA and the built up area which could prevent sprawl. Dale Lane and The Dingle (wooded area) form a durable boundary to the west. To the far west B roads and tracks form durable boundaries combined with some less durable boundaries consisting of existing development. The GA is well connected to the built up area along the northern and western boundaries and there is potential for rounding off the settlement pattern if the GA were developed. This would accord with the pattern of the built up area taking into account the historic context of the Green Belt and the intentions of the New Town Outline Plan. There is limited existing ribbon development and the GA has a weak role in preventing further ribbon development. Overall the GA makes a weak contribution to checking unrestricted sprawl.
- 8.17 Pegasus Rating – Weak Contribution – Pegasus agree with the overall contribution provided by Arup. Dale Lane and The Dingle (wooded area) form a durable boundary to the west and similarly, the GA is bound by strong, permanent and durable boundaries to the north, east and west which

would prevent unrestricted sprawl. The GA is well connected to the built up area along the northern and western boundaries and there is potential for rounding off the settlement pattern if the GA were developed. The development of this GA represents a good opportunity for the rounding off of the settlement. There is limited ribbon development within the GA and therefore overall, the GA is considered to have a weak contribution to this purpose.

*Purpose 2 – To prevent neighbouring towns merging into one another*

- 8.18 Arup Rating – No Contribution - The GA does not play a role in preventing towns from merging.
- 8.19 Pegasus Rating – No Contribution – Pegasus agree with this overall rating and do not consider this General Area to contribute towards this purpose. The existing settlement of Grappenhall extends eastwards to the north of the GA. Similarly, there are clusters of existing development and smaller settlements inset within this GA, including; Appleton Thorn, Grappenhall Hays and Stretton Green Distribution Park/Barleycastle Trading Estate/Appleton Thorn Trading Estate. The development of this GA would not reduce the existing gap between the Warrington urban area and Lymm/other smaller settlements.

*Purpose 3 – To assist in safeguarding the countryside from encroachment*

- 8.20 Arup Rating – Weak Contribution - There are mostly durable boundaries between the GA and the Warrington urban area. The boundaries between the GA and the inset settlements are not durable and would not prevent encroachment into the GA. Knutsford Road, the M6, the M56 and London Road form durable boundaries between the GA and the countryside which could prevent encroachment beyond the GA if the GA were developed. The existing land uses consist predominantly of open countryside although includes the washed over villages of Stretton and Grappenhall Village. The GA has limited connections to the open countryside along the eastern boundary and part of the southern boundary. Given that there are inset settlements encompassed by the GA and washed over villages, it therefore only supports a weak degree of openness as a whole. Overall the GA makes a weak contribution to safeguarding from encroachment.
- 8.21 Pegasus Rating – Weak Contribution – Pegasus agree with the overall rating provided by Arup. Excluded from the GA are a number of smaller settlements (Appleton Thorn and Grappenhall Hays) and the trading estate adjacent to the M56 however although these are excluded from the Green Belt GA, the presence of this built form has a significant impact of the character and setting of this GA and reduces the sentiment of being located within the open countryside. When travelling along the access roads to these settlements and employment areas, there are little in the way of long line views or a strong sense of openness. It is however acknowledged that there are a number of PRoW within the GA linking the urban areas and a number of parks and recreational areas within the GA; Grappenhall Sports Club, Grappenhall Cricket Club, Grappenhall Heys Walled Garden. Pegasus agree that Knutsford Road, the M6, the M56 and London Road form durable boundaries between this General Area and the countryside, which could prevent encroachment beyond this area if it was to be developed.

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*Purpose 4 – To preserve the setting and special character of historic towns*

- 8.22 Arup Rating – Weak Contribution - Warrington is an historic town. The GA crosses an important viewpoint of the Parish Church although it is separated from the historic centre of Warrington and it is not within 250m of the Warrington Town Centre Conservation Areas. The GA therefore makes a weak contribution to this purpose.
- 8.23 Pegasus Rating – Weak Contribution - As stated above, Warrington is recognised as a historic town and therefore should be afforded weight in Green Belt terms. The map in Figure 12 shows the important views of the Parish Church which is relevant to this GA. Having said that, the GA is not within close proximity to any Conservation Areas and therefore overall, the GA make a weak contribution to this purpose.

*Purpose 5 – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land*

- 8.24 Arup Rating – Moderate Contribution - The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the GA makes a moderate contribution to this purpose.
- 8.25 Pegasus Rating – Moderate Contribution – Firstly, it is worth noting that all **GA's** have been rated the same in this regard. As stated within the Stage 1 assessment, Warrington has 298.72 hectares of unconstrained previously developed PDL SHLAA sites. As recognised within the consultation document, **Green Belt land is required to meet the borough's housing needs and** therefore although we do not disagree with this overall rating, Green Belt land is required for the future housing and employment needs of the borough. There is very limited brownfield land to the south of Warrington and therefore although we agree with this rating, Green Belt land will need to **be released to accommodate the borough's housing need.**

*Overall Assessment*

- 8.26 Arup Rating – Weak Contribution - The GA makes a moderate contribution to one purpose, a weak contribution to three and no contribution to one. The GA has therefore been judged to make a weak overall contribution to the Green Belt. Although the GA makes a moderate contribution to assisting in urban regeneration, it is well connected to the built up area and there is potential for development to represent rounding off of the settlement pattern. Furthermore the GA supports a weak degree of openness with non-durable boundaries which would not prevent encroachment, and it does not contribute to preventing towns from merging.
- 8.27 Pegasus Rating – Weak Contribution – In line with the methodology with the October 2016, there is a 3/1/1 split and therefore, overall this GA is considered to have a weak contribution to Green Belt purposes. The GA would have a limited impact on the Green Belt, should the GA be **developed for the borough's future housing and employment needs.** The GA is well connected to the existing built up area and represents a rounding off of the settlement pattern. Land in this General Area would not contribute towards the coalescence of settlements nor the sprawl of the

built up area of Warrington and therefore we agree that this GA has a weak contribution to Green Belt purposes.

*Conclusions*

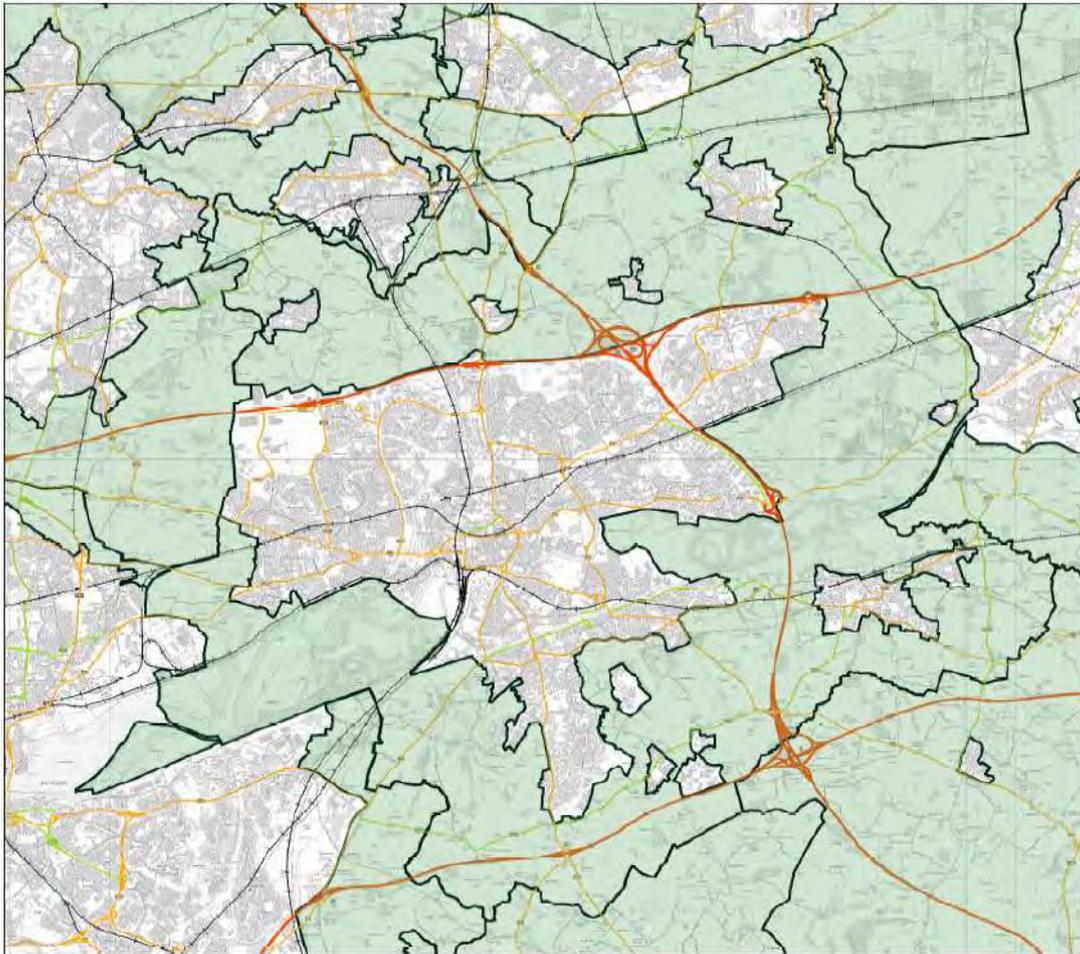
- 8.28 As demonstrated above within this section and in the proceeding section, General Area 10 makes the least contribution to Green Belt purposes in comparison to the other 23 General Areas. Arup consider this General Area to have a weak contribution to Green Belt purposes and we support this rating. In light of this, this area is considered to be a suitable location for future growth in Warrington and Green Belt release.
- 8.29 General Area 9 is located immediately adjacent to General Area 10 and is considered to have a moderate contribution to Green Belt purposes. GA 9 is one of 7 other General Areas which are considered to make a moderate contribution to Green Belt purposes however this area of Warrington is considered to be most suitable to accommodate future growth in Warrington. Following on from the Stage 1 Green Belt assessment, we now go on in the proceeding section of the report assess demonstrate General Areas 9 and 10 are considered to be the most appropriate to accommodate future growth.

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## 9. FUTURE GROWTH IN WARRINGTON

- 9.1 The Stage 1 Green Belt assessment was prepared to assist the Council in identifying locations which are the most appropriate for future housing and employment growth in Warrington. Given that there is insufficient land within the main urban area to accommodate the housing and employment requirement, Green Belt release is necessary. The Council have opted with the identification and allocation of a Garden Suburb to provide the housing numbers and employment floorspace requirements to meet the needs of the borough.
- 9.2 Using the findings of our Green Belt Assessment, we have identified which areas would be the most suitable and appropriate for the large scale development of a Garden Suburb. The Council have identified land to the south of Warrington to accommodate the proposed Garden Suburb. We agree with this proposed location and provide further details below as to why this area of Warrington is considered the most appropriate to accommodate future housing and employment development in Warrington.
- 9.3 Our Green Belt assessment identified that General Area 10 overall has a weak contribution to Green Belt purposes. This is the only General Area out of all 24 areas which is considered to have a weak contribution. **As such, we agree with Warrington Borough Council's proposal to** release this GA to be developed to accommodate the Garden Suburb.
- 9.4 Importantly, only parcels to the south of Warrington make no contribution to Purpose 2. In comparison, land to the north, east and west of Warrington, raises concerns with coalescence issues and the sprawl of the large built up area of Warrington. Figure 14 below depicts this and we provide further commentary below. A larger version of this plan can be found at Appendix 2.

Figure 14 – Map to show the Green Belt/settlement boundaries around Warrington



*Land to the east of the main urban area of Warrington*

- 9.5 We have some concerns with future growth during the plan period and beyond to the east of the main urban area of Warrington, which could effectively merge Warrington with Lymm. As shown in Figures 14 and 15, from the settlement edge of Lymm to the edge urban area of Altrincham, there is currently a gap of 4.57km. The development of a Garden Suburb to the east of the Warrington would move the main urban area significantly closer to the neighbouring authority of Trafford and the settlement of Altrincham.

Figure 15 – Aerial Image to show the east of the urban area of Warrington



- 9.6 Furthermore, where there is a distance of 1.77km between Lymm and Warrington, there are no strong, permanent or durable boundaries which would prevent the coalescence of Lymm with Partington. As such, future development of the scale of a Garden Suburb is not considered to be the most suitable or appropriate location for future growth.

*Land the north of the main urban area of Warrington*

- 9.7 As noted in the proformas of the General Areas, we have significant concerns with development to the north of the main urban area and the coalescence/urban sprawl that would occur with the neighbouring authority of St Helens. We are concerned that the Council's Green Belt assessment and the ratings provided by Arup has failed to take into account the coalescence issues that would occur if large scale development was proposed to the north of Warrington. Development in this location would cause the sprawl of the built up area of St Helens.
- 9.8 As shown in Figure 16 below, there are narrow distances between the settlements within the Warrington borough and Newton-le-Willows which is located in the St Helens borough. Between the settlement of Burtonwood and Newton-le-Willows, there is a gap of 1.1km and 1.31km (depending on the location). Although we do recognise that Sankey Brook and a dense wooded area bounds Newton-le-Willows in this location, we have concerns if this area in between the two settlements were to be developed, it would significantly reduce the actual and perceived distance

in between these two settlements and enhance the sense of coalescence and merging of settlements.

Figure 16 – Aerial Image to show the north of the urban area of Warrington



9.9 As such, given the concerns we have raised above, we do not consider this to be the most appropriate location for large scale future growth in Warrington.

*Land the west of the main urban area of Warrington*

9.10 To the west of Warrington, we have similar concerns that the development of a large scale Garden Suburb could not be accommodated in this area. As shown in Figure 17 below, in this location there is a gap of 0.85km between the main urban area of Warrington and the built up area of Widnes (which is located in the neighbouring authority of Halton). The development of a large scale development, such as a Garden Suburb, would raise some concerns with the coalescence of these settlements and built up areas. There is insufficient land in this location to accommodate this proposed level of development.

9.11 Furthermore, in this location, there are no strong, permanent or durable boundaries which would prevent the sprawl of this built up areas and the coalescence/merging of Widnes and Warrington. As such, to the west of the urban area of Warrington, we suggest there is little room to allocate the scale of land required for a Garden Suburb.

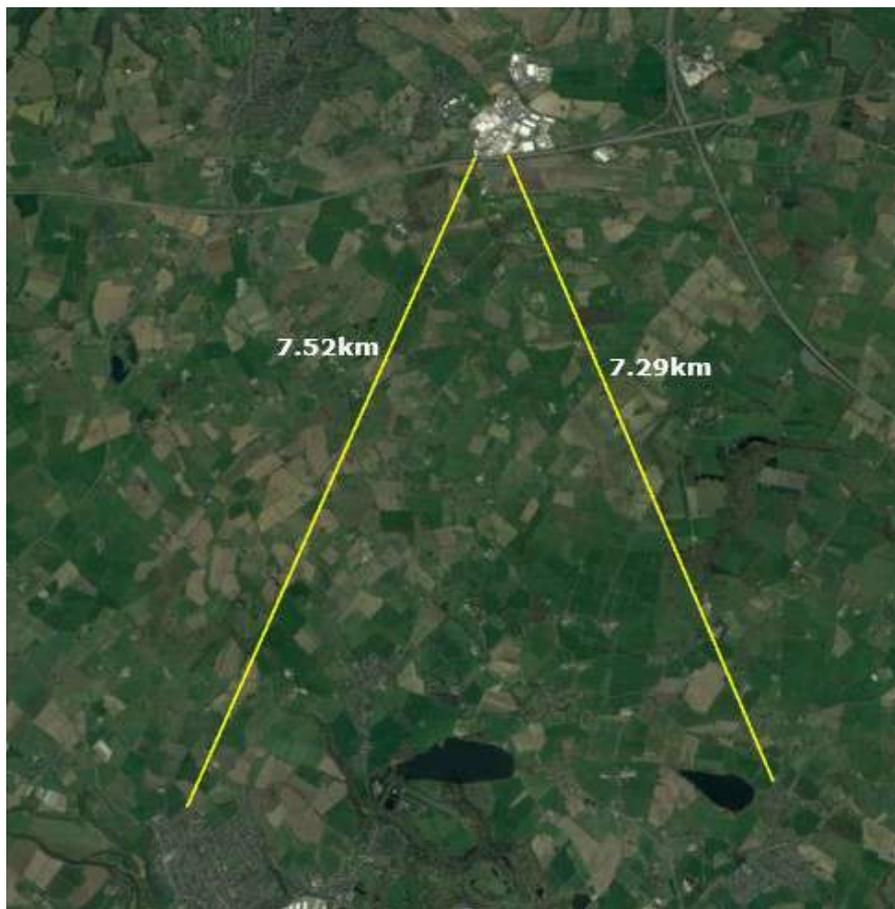
Figure 17 – Aerial Image to show the west of the Warrington urban area



*Land to the south of the Warrington*

- 9.12 We agree with the proposed location of the Garden Suburb and consider this location to be the most appropriate to accommodate the land required to accommodate a Garden Suburb. As suggested by the Council, the south of Warrington could be developed without causing the coalescence of any settlements whilst preventing the sprawl of the main urban area of Warrington.
- 9.13 As shown in Figure 18 below, there is a gap of 7.29km between the existing built form in Warrington and the settlement of Wincham to the south of this area (within the Cheshire West and Chester local authority borough).
- 9.14 Furthermore, the M56 forms the southern boundary of the proposed Garden Suburb. This is considered to be an extremely robust, strong and permanent boundary which would prevent the urban sprawl of the main urban area of Warrington and prevent the coalescence of settlements. Indeed, General Parcel, 11 and 12 positioned further southwards on the opposite side of the M56 do not contribute towards Purpose 2 of the Green Belt.
- 9.15 Furthermore, as described earlier on in this section, General Area 10 is considered to have a weak contribution in Green Belt terms and therefore development in and around this area should be identified to accommodate the additional land required for the Garden Suburb.

Figure 18 – Aerial Image to show to the south of Warrington



- 9.16 We agree with the Council's proposed location for the Garden Suburb and consider the south to be the most suitable and appropriate location for the large scale future growth in Warrington.

#### *Conclusions*

- 9.17 In terms of identifying the most suitable location for a Garden Suburb, the areas which contribute the least towards the five Green Belt purposes should be identified in the first instance. As demonstrated in this and the preceding sections of the report General Area 10 contributes least towards the Green Belt purposes **and therefore we support the Council's allocation of this General Area** to accommodate the Garden Suburb. The south of the main urban area of Warrington is the most appropriate location to accommodate future development given there are no issues with coalescence of neighbouring settlements or the sprawl of the large built up area of Warrington/neighbouring authorities.
- 9.18 We have some serious concerns with the Garden Suburb being located to the north, east or west of the main urban area of Warrington owing to issues with the coalescence and the sprawl of the main urban area of Warrington, as well as the sprawl with the neighbouring authorities such as Halton and St Helens. As such, we wholly agree and support the location of the Garden Suburb.

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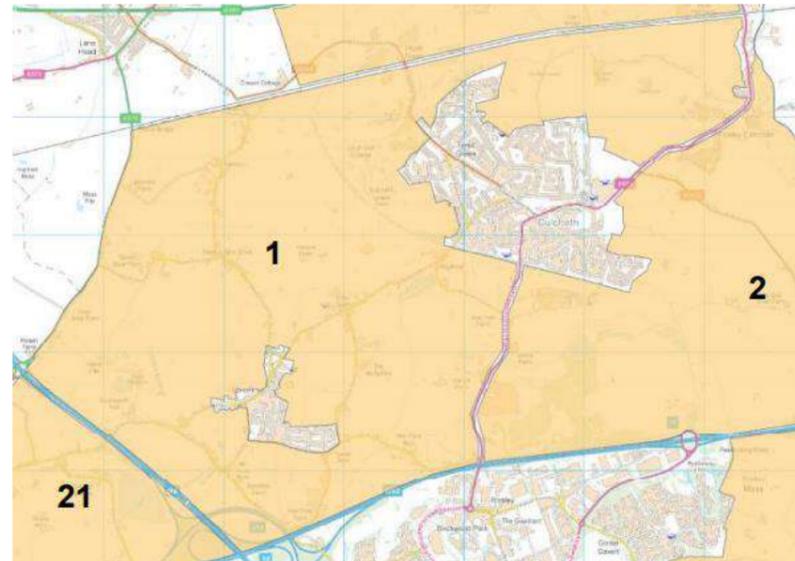
## 10. CONCLUSIONS

- 10.1 This Green Belt Assessment has been prepared in support of the Warrington Garden Suburb and in particular, the land which is being promoted by Taylor Wimpey (UK) Ltd.
- 10.2 This report has looked in detail at the Stage 1 Green Belt Assessment prepared by Arup on behalf of Warrington Borough Council in support of the emerging Local Plan. In the Stage 1 assessment, **24 General Areas were identified around Warrington. The land within Taylor Wimpey's control is located within General Areas 9 and 10.**
- 10.3 Pegasus Group reviewed each of the 24 General Areas and where we considered there to be a difference with the Arup rating, we have said so. In this case where there has been a difference, we have provided additional commentary as to why we disagree with this rating and provided an alternative rating. Overall, we agree with methodology however we have differed with the rating on a number of General Areas, particularly with regards to Purpose 1 and 2.
- 10.4 In terms of General Area 10, Pegasus Group agreed with the rating provided by Arup and found that the General Area had the lowest overall contribution out of all 24 General Areas, **with a 'weak contribution'** to Green Belt purposes. General Area 9 was considered by Arup to have a moderate contribution which we also agree with however we have differed on some of the individual five purposes.
- 10.5 The Council propose to locate the Garden Suburb within General Areas 9 and 10. We agree with this proposal and consider this area of Warrington (to the south of the main urban area of Warrington) to be the most suitable and appropriate area to accommodate future housing and employment growth in the borough.
- 10.6 Large-scale development to the north/east/west of the main urban area of Warrington, would cause the coalescence of settlements and the sprawl of large of the large built up area of Warrington/the neighbouring authorities. We acknowledge that some of these locations would be suitable for smaller scale development however the proposed Garden Suburb would be most suitably located in General Areas 9 and 10, to the south of Warrington where there would be no issues with coalescence or urban sprawl.

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APPENDIX 1 – GENERAL AREAS PROFORMAS

General Area 1



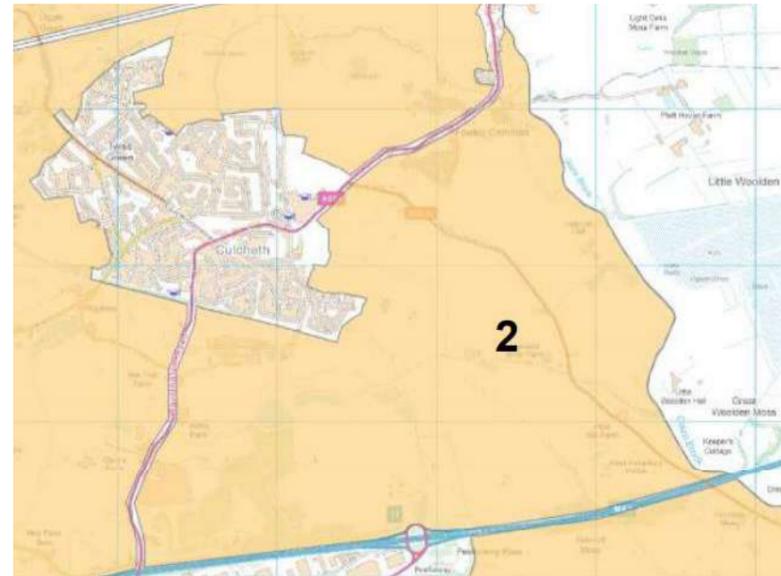
<p><b>Pegasus Site Description:</b> The parcel comprises of approximately 378 hectares of predominantly agricultural land located to the north east of the main urban area of Warrington. The settlement of Croft, part of Culcheth and some smaller more minor settlements are located within this parcel.</p>
<p><b>Boundaries:</b> The site is bound by the M62 to the south, the M6 and Winwick Lane to the west, the railway line to the north and the A574 Warrington Lane to the east. The parcel goes around the settlement of Culcheth but doesn't include this built form.</p>
<p><b>Uses:</b> Residential dwellings, Partridge Lakes Fishery, Kenyon Lane Nurseries, a number of small villages (Kenyon, Little End and New Lane End), Croft Golf Centre, Croft Riding Centre, Culcheth High Score. agricultural buildings and farms. There is also a large sand pit within the parcel.</p>
<p><b>Built Form:</b> There are many examples of built form within this parcel however as shown in the image to the left, the larger built up areas of Croft and Culcheth are not included within the Green Belt and therefore have been excluded from the parcel. There are a number of small villages located within the parcel (Kenyon, Little End and New Lane End).</p>
<p><b>Natural Form:</b> Culcheth Linear Park runs through the parcel in the north eastern section of the parcel. The individual field parcels are bound by defined trees and hedgerows.</p>
<p><b>Public Access:</b> The parcel has a significant number of PRoW within the parcel linking all the parcel boundaries as well as linking the smaller settlements.</p>
<p><b>Other:</b> There are a number of listed buildings within this parcel, all of which are Grade II listed. Overall the parcel is located within Flood Zone 1 however there are some small areas to the south of Croft which are Flood Zone 2.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	MC	The M62 forms a durable boundary between the GA and the built up area along the southern boundary. This durable boundary could prevent sprawl. The GA is only connected to the built up area along this southern boundary. There is limited existing ribbon development along Mustard lane, Lady Lane, Dam Lane, Broseley Lane and Heath Lane and the GA has a role in preventing further ribbon development. Overall the GA makes a moderate contribution to checking unrestricted sprawl.	MC	Agree - This parcel is defined by strong durable boundaries to the north, east, south and west and therefore these boundaries would prevent urban sprawl. Having said that, the development of this parcel would significantly increase the built up area of Warrington and move towards the built up area of Culcheth to the north.
2. To prevent neighbouring town merging into one another	SC	The GA forms an essential gap between the Warrington urban area and Culcheth, whereby a reduction in the gap would result in the actual merging of these towns. However, the northern section of the GA could be developed without resulting in the merging of the towns. Overall the GA makes a strong contribution to preventing towns from merging.	SC	Agree - This parcel is essential in preventing the built up area of Warrington, Culcheth and Croft from merging. The north of the settlement of Warrington is particularly sensitive with regards to this purpose and therefore this parcel is fundamental with regards to this purpose. We disagree with Arup's assessment which considers that the northern section of the GA could be developed without resulting in the merging of towns. We consider the northern part of this parcel to be equally sensitive and therefore we agree that this parcel makes a significant contribution to this purpose. Added to this, the development of this parcel would cause the merging of Croft, Culcheth and the urban area of Warrington. There are also a number of smaller villages located within this parcel and therefore the development of this parcel would see the merging of these settlements as well although we do recognise that this purpose does look to preserve the merging of towns. Overall, this parcel is instrumental in Green Belt terms with regards to this purpose.
3. To assist in safeguarding the countryside from encroachment	MC	There are durable boundaries between the GA and the Warrington urban area. The boundaries between the GA and the inset settlements (Culcheth and Croft) are not all durable consisting of the limits of development and would not prevent encroachment into the GA. Winwick Lane, the railway line and Glaze Brook form durable boundaries between the GA and the countryside which could prevent encroachment beyond the GA if the GA were developed. The existing land uses consist predominantly of open countryside although includes the washed over villages of New Lane End and Fowley Common. The GA is connected to the open countryside along the northern, north western and eastern boundaries although includes inset settlements. Given that there are inset settlements encompassed by the GA and washed over villages, it therefore only supports a weak moderate degree of openness as a whole. Overall the GA makes a moderate contribution to safeguarding from encroachment.	MC	Agree - It is agreed that the General Area is bound by permanent and durable boundaries (particularly the railway and Winwick Lane) which would prevent the encroachment into the countryside. There are a number of smaller washed over villages within the parcel as well as the inset settlements of Culcheth and Croft. These settlements have an impact of the overall setting of the parcel and the setting/character of the open countryside. Given the size of the parcel, however, there are a number of areas within this wider parcel where there are long line views and limited built form. There are also a number of opportunities to partake in recreational activities within the parcel including Culcheth Linear Park, Partridge Lakes fishery, Croft golf centre and the numerous public rights of way which are located within the parcel). We agree that overall, given the inset settlements within the GA and the washed over villages, we agree that this parcel supports a weak moderate degree of openness.
4. To preserve the setting and special character of historic towns	NC	Warrington is a historic town however the GA is not within 250m of any of the Town Centre Conservation Areas. The GA does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.
<u>Justification for assessment and Overall Assessment</u>	MC	The GA makes a strong contribution to one purpose, a moderate contribution to three and no contribution to one. The GA has therefore been judged to make a moderate overall contribution to the Green Belt. It contributes strongly to preventing neighbouring towns from merging as it maintains an essential gap between the Warrington urban area and Culcheth. Although the boundaries between the GA and the inset settlements are weak, the M62 maintains a strong boundary between the Warrington urban area and the GA. Inset and washed over villages mean that the GA only supports a weak-moderate degree of openness. The GA does not contribute to preserving historic towns as it is not located near the historic area of Warrington.	SC	Disagree - In line with the methodology set out in the Green Belt assessment, where there is a 3/1/1 split, the majority contribution should always be applied unless one of the minority contributions is 'strong' and one is moderate. In this case, professional judgement should be applied. In this case, we disagree with the Arup rating and we consider that this parcel has a strong contribution overall in Green Belt terms. The General Area contributes most significantly to Purpose 2 and the prevention of the merging of towns. We have significant concerns with development to the north of the urban area of Warrington and consider that development in this area, could cause the merging of settlements and in particular the merging of Croft, Culcheth and the urban area of Warrington. There is limited room for expansion in this location and should it be brought forward for development and released from the Green Belt, it would cause the merging of towns and the unrestricted sprawl of the large built up area of Warrington. As such, we consider this parcel to have overall, a strong contribution to Green Belt purposes.

Key - No Contribution (NC)      Weak Contribution - WC      Moderate Contribution - MC      Strong Contribution - SC

General Area 2



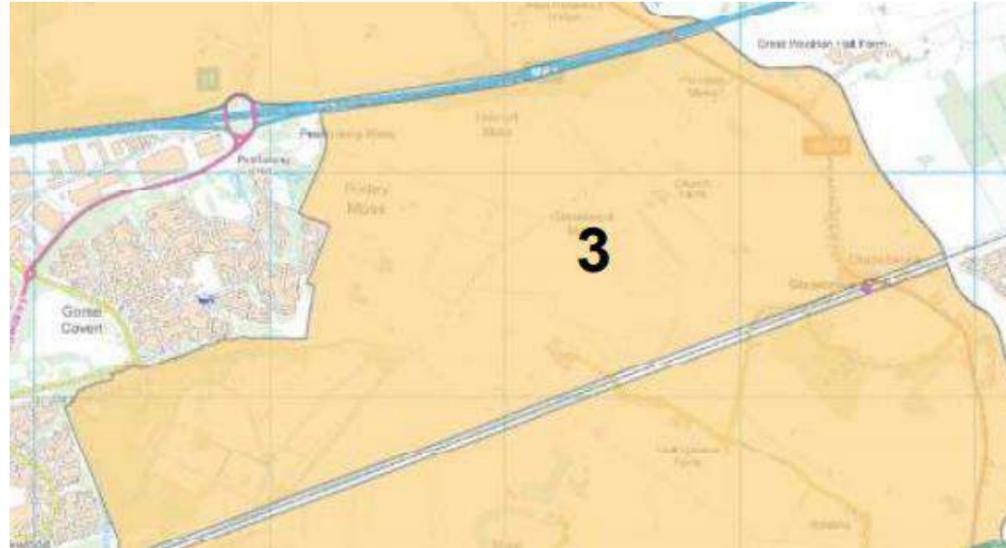
<p><b>Pegasus Site Description:</b> The parcel comprises approximately 664 hectares of agricultural land to the north east of the settlement of Warrington. The parcel abuts the settlements of Glazebury, Culcheth and Birchwood.</p>
<p><b>Boundaries:</b> The parcel is bound by the M62 to the south, the A574 Warrington Road to the west (including the urban area of Culcheth), the existing urban area of Glazebury to the north and Glaze Brook to the east.</p>
<p><b>Uses:</b> Landfill site, residential dwellings, HMP Risley, Sewage Works, Taylor Business park, farms (including associated farm buildings). The remaining land comprises agricultural greenfields.</p>
<p><b>Built Form:</b> There are a number of examples of existing built form within the parcel. The most prominent being the Taylor Business Park, the cluster of residential dwellings and HMP Risley. There is also a dismantled railway located within the parcel. There are a number of significant roads located within the parcel including B5212 Holdcroft Lane which runs through the parcel north to south as well as a number of smaller, more minor roads.</p>
<p><b>Natural Form:</b> Silver Lane Lakes is a Country Park which is located within this parcel. Around and within this parcel and in fact throughout the parcel, there are some dense wooded areas. A dense wooded tree line is located on the either side of the dismantled railway.</p>
<p><b>Public Access:</b> There are a number of public footpaths within this General Area which surround the Silver Lake Lakes Country park and connect this area with Culcheth and extend to the northern boundary of the parcel. This parcel provides good links from the urban areas to the countryside.</p>
<p><b>Other:</b> There is very little built form within the parcel except along the eastern boundary (Glaze Brook) where there are some Flood Zone 3 areas. Glaze Brook forms the boundary between Cheshire and Greater Manchester. Warrington in Cheshire and the boundaries of Wigan, Salford and Trafford in Greater Manchester.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	MC	The M62 forms a durable boundary between the GA and the built up area along part of the southern boundary. The GA is only connected to the built up area along this boundary and this durable boundary could prevent sprawl. Overall the GA makes a moderate contribution to checking unrestricted sprawl	MC	Agree - We agree with the Arup rating provided and uphold that the M62 is a durable boundary along the south of the General Area to prevent the sprawl of the urban area of Warrington.
2. To prevent neighbouring town merging into one another	SC	The GA forms an essential gap between the Warrington urban area and Culcheth whereby a reduction in the gap would result in the actual merging of these towns. Any development in the western and southern sections of the GA would significantly reduce the gap between the towns. Overall the GA makes a strong contribution to preventing towns from merging.	SC	Agree however... <b>We would like to highlight the significant importance of this parcel in preventing the merging of the large built up area of Warrington with Culcheth.</b> There is limited room for expansion to the north of Warrington and in particular, in this location there are concerns with the merging of the settlements of the urban area of Warrington and Culcheth. This parcel is significant in preventing the merging of these settlements. We agree that this General Area makes a strong contribution in preventing the merging of towns.
3. To assist in safeguarding the countryside from encroachment	MC	The boundary between the built up area and the GA is durable and could prevent encroachment. The boundary between the GA and inset settlement of Culcheth consists of the limits of development which does not represent a durable boundary which would prevent encroachment. The Glaze Brook forms a durable boundary between the GA and the open countryside which may be able to prevent encroachment beyond the GA if the GA were developed. The GA is well connected to the open countryside along the eastern boundary and part of the southern, northern and western boundaries, although includes part of the inset settlement of Culcheth. The existing land use predominantly consists of open countryside although includes HMP Risley and Taylor Business Park to the west of the GA, Moss Side Fishery to the south and sparsely located farm buildings and residential development. The GA supports a moderate degree of openness as it contains part of less than 20% built form and some areas of dense vegetation. Overall the GA makes a moderate contribution to safeguarding from encroachment.	MC	Agree - There is a significant amount of built form within the parcel. The Taylor Business Park, HMP Prison and the clusters of residential dwellings make a significant impact on the overall setting/character of this general area although overall when looking at the whole of the parcel, the majority of the parcel is made up of agricultural fields. Although there are some notable areas of built form within the parcel, there are some open long line views and particularly around the country park, there is a stronger sense of openness. Added to this, there are some dense wooded areas and defined hedgerows which prevent some views of the existing built form. Added to this, there are a number of public rights of way and footpaths within the parcel which further enhance the public opportunity to access the open countryside. It is agreed that the boundary with Glaze Brook provides a durable boundary which would prevent encroachment into the wider open countryside.
4. To preserve the setting and special character of historic towns	NC	Warrington is a historic town however the GA is not within 250m of any of the Town Centre Conservation Areas. The GA does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>MC</p>	<p>The GA makes a strong contribution to one purpose, a moderate contribution to three and no contribution to one. The GA has therefore been judged to make a moderate overall contribution to the Green Belt. It contributes strongly to preventing neighbouring towns from merging as it maintains an essential gap between the Warrington urban area and Culcheth. Although the boundaries between the GA and the inset settlements are weak, the M62 maintains a strong boundary between the Warrington urban area and the GA. The level of development within the GA means that it only supports a moderate degree of openness. The GA does not contribute to preserving historic towns as it is not located near the historic area of Warrington.</p>	<p>SC</p>	<p>Disagree - In line with the methodology set out in the Green Belt assessment, where there is a 3/1/1 split, the majority contribution should always be applied unless one of the minority contributions is 'strong' and one is moderate. In this case, professional judgement should be applied. In this case, we disagree with the Arup rating and we consider that this parcel has a strong contribution overall in Green Belt terms. The General Area contributes most significantly to Purpose 2 and the prevention of the merging of towns. We have significant concerns with development to the north of the urban area of Warrington and consider that development in this area, could cause the merging of settlements and in particular the merging of Culcheth and the urban area of Warrington. There is limited room for expansion in this location and should it be brought forward for development and released from the Green Belt, it would cause the merging of towns. As such, we consider this parcel to have overall, a strong contribution to Green Belt purposes.</p>
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Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 3



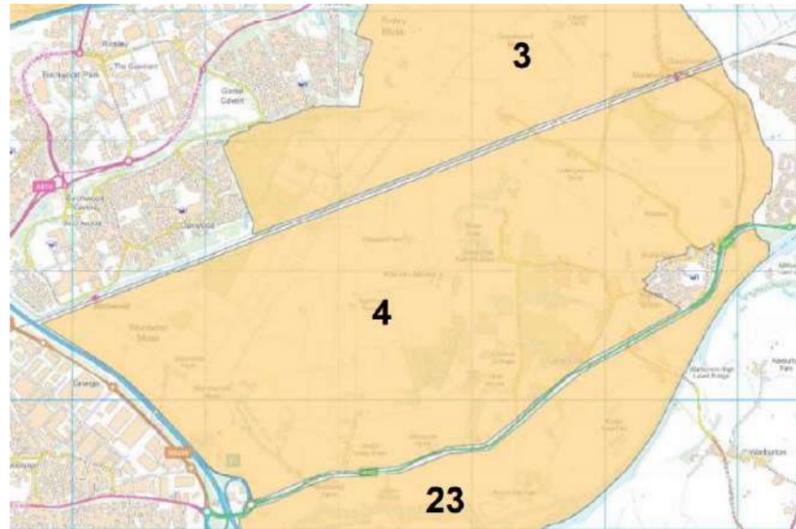
<p><b>Pegasus Site Description:</b> This parcel is a fairly rectangular shaped parcel measuring approximately 413 hectares. The parcel is located to the north east of the main urban area of Warrington and on the edge of the Warrington local authority area.</p>
<p><b>Boundaries:</b> The parcel is bound by the M62 to the north, Glaze Brook to the east, a railway line to the south and the existing urban edge of Birchwood to the west.</p>
<p><b>Uses:</b> The parcel is predominantly made up of agricultural greenfields which includes Risley Moss Country park which is located in the western part of this parcel. There are a number of farms located within the parcel. One of the farms appears to be used for caravan storage.</p>
<p><b>Built Form:</b> A dismantled railway, farm building, residential ribbon development along Glazebrook Lane. The B5212 Glazebrook Lane runs through the General Area in the eastern section of the parcel running from north to south. There are also a number of smaller more minor roads within the parcel.</p>
<p><b>Natural Form:</b> Risley Moss Country Park makes up a significant proportion of the parcel. The field parcels are defined by some dense hedgerows.</p>
<p><b>Public Access:</b> One ProW runs vertically through the site from north to south connecting this parcel to Silver Lane Lakes to the north of this General Area. The Risley Moss Country Park provides a number of opportunities for the public to access the open countryside.</p>
<p><b>Other:</b> There are no listed buildings located within this General Area however there is Grade II listed building on the southern boundary and a scheduled ancient monument adjacent to Glaze Brook on the eastern boundary (Promontory fort 300m west of Great Woolden Hall Farm).</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	SC	The boundary between the GA and the built up area consists of Silver Lane, Birchwood Brook and a public footpath. These boundaries are not all durable and may not be able to prevent sprawl in the long term. There is existing ribbon development along Glazebrook Lane and Woolden Road and the GA plays a role in preventing further ribbon development. Overall the GA makes a strong contribution to checking unrestricted sprawl.	SC	Agree - We agree with the contribution provided by Arup and not all the General Area boundaries are considered to be durable and therefore may not be able to prevent urban sprawl in the long term.
2. To prevent neighbouring town merging into one another	SC	The GA forms an essential gap between the Warrington urban area and Cadishead in the adjacent neighbouring authority of Salford, whereby development of the whole of the GA would result in the actual merging of these towns. However, development in the western section of the GA would reduce the gap between towns but not result in merging. Overall the GA makes a strong contribution to preventing towns from merging.	SC	Agree - This parcel is significant in preventing the merging of the main urban area of Warrington and the settlement of Cadenhead in the neighbouring authority of Salford. The development of this parcel would result in the merging of these towns and therefore this parcel makes a significant contribution to this purpose.
3. To assist in safeguarding the countryside from encroachment	SC	The boundaries between the built up area and the GA are partly durable however may not be able to prevent encroachment in the long term. Glaze Brook forms a durable boundary between the GA and the open countryside which may be able to prevent encroachment if the GA were developed. The GA is well connected to the open countryside along the northern, eastern and southern boundaries. The existing land use predominantly consists of open countryside including the Risley Moss Country Park. There are some sparsely located farm building and the small washed over village of Glazebrook is located to the east of the GA. The GA supports a moderate-strong degree of openness given that there is less than 10% built form however the Country Park includes areas of dense vegetation. Overall the GA makes a strong contribution to safeguarding from encroachment.	SC	Agree - We agree with this rating provided by Arup and consider this parcel to have a significant contribution towards this purpose. Risley Moss Country Park is located within this parcel which provides significant opportunities for the public to access the open countryside. There is limited built form within the parcel and therefore there is a strong degree of openness. There are long line views from this parcel and it is considered to be characteristic of the open countryside. It is recognised that the washed over settlement of Glazebrook is located within this parcel however, overall this parcel is considered to make a strong contribution to this purpose.
4. To preserve the setting and special character of historic towns	NC	Warrington is a historic town however the GA is not within 250m of any of the Town Centre Conservation Areas. The GA does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>SC</p>	<p>The GA makes a strong contribution to three purposes, a moderate contribution to one and no contribution to one. The GA has therefore been judged to make a strong overall contribution to the Green Belt. There are non-durable boundaries between the GA, the urban area and the countryside and existing ribbon development which the GA helps to limit. Development would completely reduce the gap between the Warrington urban area and Cadishead. The GA supports a moderate-strong degree of openness and assists in urban regeneration. The GA does not contribute to preserving historic towns as it is not located near the historic area of Warrington.</p>	<p>SC</p>	<p>Overall, we agree with the rating provided by Arup. The GA makes a strong contribution to three out of the five purposes and therefore the GA is significant in Green Belt terms. There are significant opportunities to access the open countryside within this parcel. As well as this, parcel is characteristic of the countryside with long line views and limited built form. The parcel is also fundamental in preventing the merging of the urban area of Warrington with Cadishead (within the neighbouring authority of Salford).</p>
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<p>Key - No Contribution (NC)</p>	<p>Weak Contribution - WC</p>	<p>Moderate Contribution - MC</p>	<p>Strong Contribution - SC</p>
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General Area 4



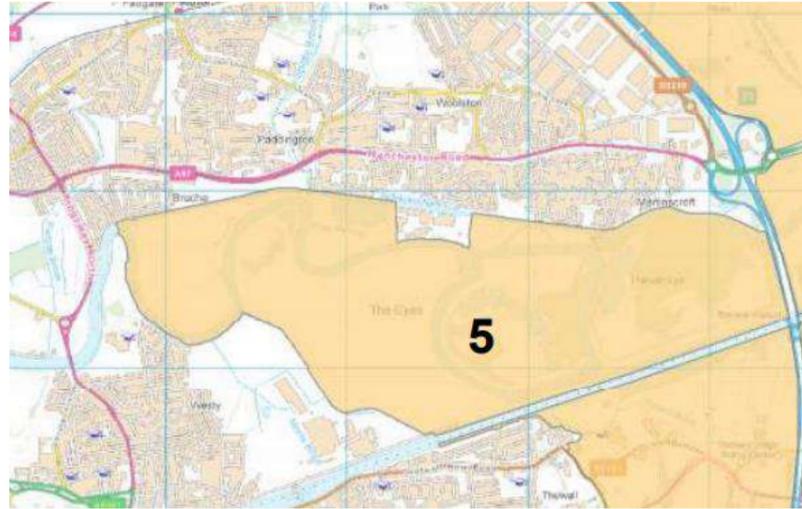
<p><b>Pegasus Site Description:</b> The parcel measures approximately 914 hectares and is located to the east of the main urban area of Warrington. This parcel is located on the edge of the Warrington Local Authority Area and borders Trafford and Salford.</p>
<p><b>Boundaries:</b> The GA is bound by the railway line to the north, the M6 to the west, the A57 Manchester Road to the south and Glaze Brook to the east.</p>
<p><b>Uses:</b> Farmland and agricultural fields and farms, fishery, residential dwellings, target club, agricultural nursery, aquatic centre, landfill site, gas compression plant.</p>
<p><b>Built Form:</b> Overall, there is very little built form within the parcel. The built form that exists within the parcel is made up of agricultural buildings, a gas compression station, a landfill site, agricultural nursery. There are no main/significant roads within the parcel however there are a number of smaller access roads/ more minor roads within the parcel.</p>
<p><b>Natural Form:</b> Rixton Claypits Nature Reserve is located within this parcel as well as a number of dense wooded areas.</p>
<p><b>Public Access:</b> There are a few PRoW which run through the site and connect this General Area with the main urban area of Warrington. The nature reserve within the parcel also further enhances the public's access to the open countryside.</p>
<p><b>Other:</b> There are no listed buildings within this General Area however there is a cluster of listed buildings in Hollins Green and one along the A57.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	MC	The M6 forms a durable boundary between the GA and the built up area along the western boundary with the railway line forming a durable boundary along part of the northern boundary. The GA is only connected to the built up area along these boundaries and these durable boundaries could prevent sprawl. Overall the GA makes a moderate contribution to checking unrestricted sprawl.	MC	Agree - The M6 on the western boundary, the railway line along the northern boundary and the A57 along the southern boundary provide strong durable boundaries which prevent urban sprawl. The parcel is connected to the urban area along the western boundary and part of the northern boundary however the M6 and the railway line are strong permanent boundaries which prevent check unrestricted sprawl and therefore we agree that overall, this parcel has a moderate contribution to this purpose.
2. To prevent neighbouring town merging into one another	SC	The GA forms an essential gap between the Warrington urban area and the Cadishead in the adjacent neighbouring authority of Salford, whereby development of the whole of the GA would result in the actual merging of these towns. However, development in the western section of the GA would reduce the gap between towns but not result in merging. Overall the GA makes a strong contribution to preventing towns from merging.	SC	<b>Agree however ...</b> We would like to highlight the significance of this parcel in its contribution to this purpose. The development of this parcel prevents to merging of the urban area of Warrington with Cadishead, Glazebrook and Hollins Green. There is limited room to the east of the urban area of Warrington for expansion without causing the merging of settlements. As such, this parcel is considered to make a strong contribution to this purpose.
3. To assist in safeguarding the countryside from encroachment	MC	The boundaries between the built up area and the GA are durable and could prevent encroachment from the built up area. The Glaze Brook forms a durable boundary between the GA and the countryside which may be able to prevent encroachment if the GA were developed. The GA is fairly well connected to the open countryside along the northern and southern boundaries although does include the inset settlement of Hollins Green. The existing land use consists predominantly of undeveloped open countryside including the Rixton Clay Pits Nature Reserve although does include sparsely located farm buildings and the washed over village of Glazebrook. The GA supports a moderate to strong degree of openness given that it has less than 10% built form and includes some areas of dense vegetation in the Country Park. Overall the GA makes a moderate contribution to safeguarding from encroachment.	SC	Disagree - We consider this parcel to have a strong contribution to this purpose and have a strong connection with the open countryside. The main land use within this parcel is agricultural greenfields within very limited built form both within the parcel and surrounding the parcel. As well as this, there are open long line views into the open countryside when stood in the centre of this General Area and no sight in many locations of built form. As well as this, there are a number of opportunities for local residents to access the open countryside within this parcel, including; Rixton Clay Pits Nature Reserve, a fishery and the public rights of way which run through this general area, connect up to the main urban area of Warrington. As such, overall we consider this parcel is considered to have strong contribution to this purpose and therefore we disagree with Arup's rating.
4. To preserve the setting and special character of historic towns	NC	Warrington is a historic town however the GA is not within 250m of any of the Town Centre Conservation Areas. The GA does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>MC</p>	<p>The GA makes a strong contribution to one purpose, a moderate contribution to three and no contribution to one. The GA has therefore been judged to make a moderate overall contribution to the Green Belt. It contributes strongly to preventing neighbouring towns from merging as it maintains an essential gap between the Warrington urban area and Cadishead. The M6 maintains a strong boundary between the Warrington urban area and the GA. The GA supports a moderate to strong degree of openness, however the durability of its boundary with the urban area means that it does not make a strong overall contribution. The GA does not contribute to preserving historic towns as it is not located near the historic area of Warrington.</p>	<p>SC</p>	<p>Disagree - We disagree with the Arup rating and we consider that this parcel has a strong contribution overall in Green Belt terms. The General Area contributes most significantly to Purpose 2 and the prevention of the merging of towns. We have significant concerns with development in this location. The development of this parcel would cause the merging of the main urban area of Warrington with Cadishead, Hollins Green and Glazebury. Although we acknowledge that Glazebury and Hollins Green are not defined as towns, it is significant in preventing the merging of Cadishead with Warrington. There is limited room for expansion in this location and should it be brought forward for development and released from the Green Belt, it would cause the merging of towns. As such, we consider this parcel to have overall, a strong contribution to Green Belt purposes. As well as the contribution to Purpose 2, we consider the parcel to have a strong contribution to Purpose 3. There are some long line views when stood on some of the roads within the centre of the parcel where there is no built form visible. There is very little built form within and surrounding the parcel and a number of opportunities to access the open countryside within this General Area. As such, overall this parcel is considered to a strong contribution to the Green Belt purposes.</p>
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Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 5



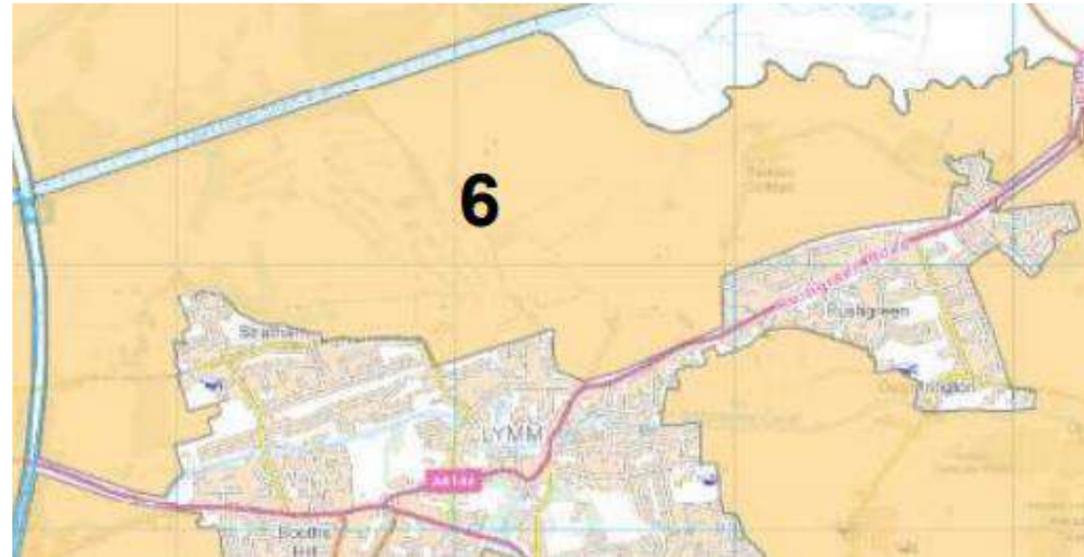
<b>Pegasus Site Description:</b> This parcel is rectangular shaped parcel enveloped within the urban area of Warrington and comprises approximately 305 hectares. This General Area is located to the east of Warrington Town Centre.
<b>Boundaries:</b> This General Area is bound by the Manchester Ship Canal to the south, the M6 to the east, the urban area of Warrington and the River Mersey, West Woods and a small industrial estate to the west.
<b>Uses:</b> The parcel comprises of greenfields, recreational uses and the River Mersey.
<b>Built Form:</b> There is no built form within the General Area however there is existing built form to the north, west and south.
<b>Natural Form:</b> Located within this General Area is Woolstan Eyes S.S.I, Paddington Meadows, Westy Trail, Westy Woods, the River Mersey. The parcel is comprised of a significant amount of trees and dense vegetation.
<b>Public Access:</b> One PRoW runs vertically through the parcel. The PRoW runs along the southern boundary along the Manchester Ship Canal. It then connects to the River Mersey running vertically through the parcel south to north and then connect with the River Mersey to the north of the parcel.
<b>Other:</b> There are some areas of Flood Zone 2 and 3 within this parcel however it is acknowledged that the whole of the General Area is not located within a flood risk area.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	WC	The River Mersey forms a durable boundary between the GA and the built up area along the northern boundary which could prevent sprawl. The south western boundary consists of sparse tree lining and does not represent a durable boundary. The GA is well connected to the built up area along three boundaries and would represent a rounding off of the built up area if the GA were developed. Overall the GA makes a weak contribution to checking unrestricted sprawl.	WC	Agree - We agree with the rating provided by Arup. The northern, eastern and southern boundaries are strong, permanent and durable boundaries which would prevent the sprawl of the large built up area. We agree that the parcel is connected to the built area along three boundaries and would provide a rounding off of the settlement as opposed to contributing to urban sprawl.
2. To prevent neighbouring town merging into one another	WC	The GA forms a less essential gap between the Warrington urban area and Lymm whereby development of the whole of the GA would reduce the gap but would not result in the merging of towns. In particular, development of the western section of the GA would be possible without reducing the actual or perceived distance between the towns. Furthermore, the M6 ensures that separation is retained. Overall, the GA makes a weak contribution to preventing towns from merging.	MC	Disagree - The development of this parcel would reduce the gap between the main urban area of Warrington and Lymm. Although the M6 is present and is located in between the urban area of Warrington and Lymm, this parcel does play a moderate role in preventing the coalescence of these settlements. Added to this, the development of this parcel would reduce the actual and perceived distance between the towns and therefore we overall disagree with the rating provided by Arup.
3. To assist in safeguarding the countryside from encroachment	MC	The boundaries between the built up area and GA are partially durable and could prevent some encroachment. The M6 and Manchester Ship Canal form a durable boundary between the GA and the countryside which could prevent encroachment beyond the GA if the GA was developed. The existing land use consists of undeveloped open countryside. The GA has a limited connection to the open countryside along two boundaries. The GA supports a strong degree of openness given it is completely undeveloped albeit there are areas of dense vegetation. Overall the GA makes a moderate contribution to safeguarding from encroachment.	SC	Disagree - We disagree with this rating provided by Arup. We acknowledge that this parcel is bound by strong durable boundaries however there is no built form within the parcel and overall, this General Area is characteristic of the open countryside. There is a S.S.S.I (Woolstan Woods Nature Reserve) as well as a park (Paddington Meadows) which provide opportunities for residents to access the open countryside. Furthermore, there is a connection through this parcel to connect the Manchester Ship Canal within the River Mersey. This access to the open countryside is considered to be significant. Although there is dense vegetation within the parcel which prevents long line views into the open countryside, this parcel is considered to make a significant contribution to Purpose 3.
4. To preserve the setting and special character of historic towns	NC	Warrington is a historic town however the GA is not within 250m of any of the Town Centre Conservation Areas. The GA does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>WC</p>	<p>The GA makes a moderate contribution to two purposes, a weak contribution to two and no contribution to one. Overall the GA makes a weak overall contribution. Development of the GA would constitute a rounding off of the urban area and the M6 and the railway line form durable boundaries preventing encroachment beyond the GA. The GA makes a moderate contribution to safeguarding the countryside from encroachment and assisting in urban regeneration as it supports a strong degree of openness and the wider area has considerable potential brownfield capacity.</p>	<p>MC</p>	<p>Disagree - In line with the methodology set out in the Green Belt assessment, where there is a 3/1/1 split, the majority contribution should always be applied unless one of the minority contributions is 'strong' and one is moderate. In this case, professional judgement should be applied. We consider this parcel to have a moderate contribution overall. Although we consider this parcel to have a strong contribution to Purpose 3, the parcel is enveloped by existing development and strong boundaries. Having said that, we recognise that the parcel would reduce the existing gap between the urban area of Warrington and Lymm. Added to this, there is an SSSI within this parcel, opportunities to access the open countryside and no built form within the parcel. On this basis, we consider this parcel to have a moderate contribution to Green Belt purposes.</p>
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Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 6



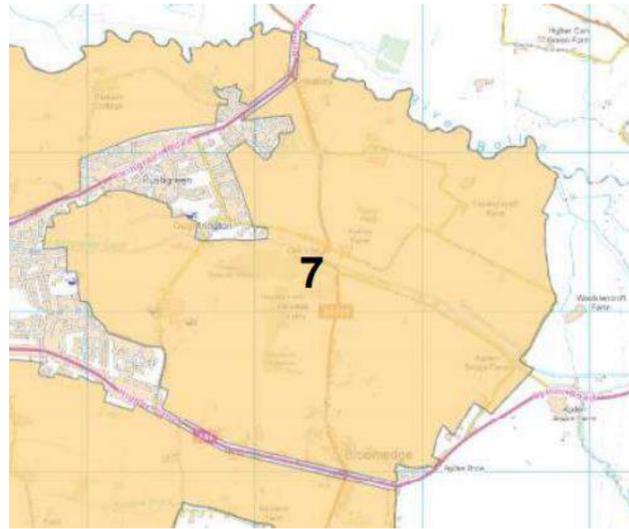
<p><b>Pegasus Site Description:</b> This parcel is an rectangular, elongated parcel located to the east of the main urban area of Warrington. The parcel comprises approximately 284 hectares of agricultural land and borders to the east, the local authority area of Trafford.</p>
<p><b>Boundaries:</b> The General Area is bound by the Manchester Ship Canal to the north, the M6 to the west, the existing urban area of Lymm to the south and the River Bollin and a footpath to the east.</p>
<p><b>Uses:</b> Agricultural Greenfields, Lymm golf club, playing fields, fishery/fish farm</p>
<p><b>Built Form:</b> There is very limited built form within the parcel. The parcel predominantly is made up of agricultural fields and Lymm Golf Club. There are a number of agricultural farm buildings, Statham Lodge and Lymm Golf Club.</p>
<p><b>Natural Form:</b> Lymm Golf Club, Sow Brook, Statham Pool. There is a significant amount of vegetation within the parcel. This is predominately associated with the golf club</p>
<p><b>Public Access:</b> There is a PRoW which runs vertically through the parcel (north/south) and connected the ship canal with the settlement of Lymm. There is also access to this parcel to the playing fields, golf course, fishery etc.</p>
<p><b>Other:</b> There is a listed building located within this parcel (Statham Lodge - Grade II) and Tanyard Farmhouse (Grade II) is located on the southern boundary. The parcel is in close proximity to Lymm which is a historic town. Within the town there is a scheduled ancient monument as well as a number of listed buildings. The majority of this parcel is located within a Flood Zone 3 area as well as having some areas of Flood Zone 2.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	NC	The GA is not adjacent to the Warrington urban area and therefore does not contribute to this purpose.	NC	Agree - We agree with the rating provided by Arup. This parcel is not located adjacent to the urban area of Warrington and therefore we agree that this parcel does not make a contribution to this purpose.
2. To prevent neighbouring town merging into one another	MC	The GA forms a largely essential gap between the Warrington urban area and Lymm whereby development of the GA would reduce the gap between the towns but would not result in them merging. Furthermore, the M6 ensures that the separation is retained. Overall, the GA makes a weak contribution to preventing towns from merging.	MC	Agree - This parcel would reduce the gap between the built up area of Warrington and Lymm. We agree that the development of this parcel would not result in the coalescence but it would significantly reduce the gap and reduce the actual and perceived distance between the two settlements. As such, we consider this parcel to have a moderate contribution to this purpose.
3. To assist in safeguarding the countryside from encroachment	SC	The GA is well connected to the open countryside given that it is only connected to the inset settlement of Lymm along the southern boundary. The boundary between the GA and the inset settlement consists of the limits of development which is not durable and may not be able to prevent encroachment. The Manchester Ship Canal, the River Bollin and the M6 form durable boundaries between the GA and the countryside which could prevent encroachment beyond the GA if the GA were developed. The existing land use predominantly consists of undeveloped open countryside including Lymm Golf Club and sparsely located farm buildings although part of the washed over village of Heatley is located at the eastern most edge. The GA supports a strong degree of openness given that it has less than 10% built form and low levels of vegetation. Overall the GA makes a strong contribution to safeguarding from encroachment.	SC	Agree - This parcel provides a number of opportunities to access the open countryside, including; Lymm Golf Club, Sow Brook playing fields, the link between the Manchester Ship Canal and the settlement of Warrington. There is very little built form within the parcel and we consider this parcel to be characteristic of the open countryside. Overall, the parcel does have a strong degree of openness and therefore we consider this parcel to have a strong contribution to this purpose.
4. To preserve the setting and special character of historic towns	MC	Lymm is a historic town. The GA does not cross an important viewpoint of the Parish Church. The GA is located within the 250m buffer area around Lymm Conservation Area. The northern tip of the Conservation Area lies adjacent to the Green Belt whilst the remainder of it is separated from the Green Belt by rows of modern residential development. Given that part of the Conservation Area lies adjacent to the Green Belt, the GA makes a moderate contribution to preserving the setting and special character of historic towns.	MC	Agree - Lymm is recognised as a historic town and although the General area does not cross any important viewpoints of the Parish Church, the General Area is located in close proximity to the Conservation Area. The south western corner of this General Areas touches the Conservation Area in Lymm which has a number of listed buildings included a Grade II * listed building and scheduled ancient monument. In light of this, this parcel makes a moderate contribution to preserving the setting of Lymm.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements. There is very little brownfield land to the south of Warrington and therefore although we do agree that this parcel has a moderate contribution to this purpose, greenfield land is required to address the borough's housing need.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>MC</p>	<p>The GA makes a strong contribution to one purpose, a moderate contribution to two, a weak contribution to one and no contribution to one. Professional judgement has been applied and the GA has been judged to make a moderate overall contribution to the Green Belt. While the GA has weak boundaries which would struggle to prevent the encroachment of Lymm into the countryside, the M6 and the railway line would limit this encroachment and prevent the town from merging with the Warrington urban area. The GA makes a moderate contribution to preserving the setting and character of Lymm and encouraging brownfield development in the wider area.</p>	<p>MC</p>	<p>Agree - We agree with the overall rating provided by Arup with regards to this purpose and consider it to make a moderate contribution overall. This parcel make a strong contribution towards protecting the countryside from encroachment given the opportunities that exist within this General Area to access the open countryside. As well as this, there is limited built form with the parcel, a strong degree of openness and the parcel is characteristic of the countryside. Although this general area has a strong contribution to this purpose, it makes a moderate contribution to purposes 2,4 and 5 and therefore, overall we consider this parcel to have a moderate contribution to the Green Belt. The development of this General Area would not cause the coalescence of the urban area of Warrington with Lymm however it would bring the areas closer and reduce the actual and perceived gap between the settlements. As well as this, the parcel is in close proximity to the Lymm Conservation and the associated listed buildings and scheduled ancient monument.</p>
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Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 7



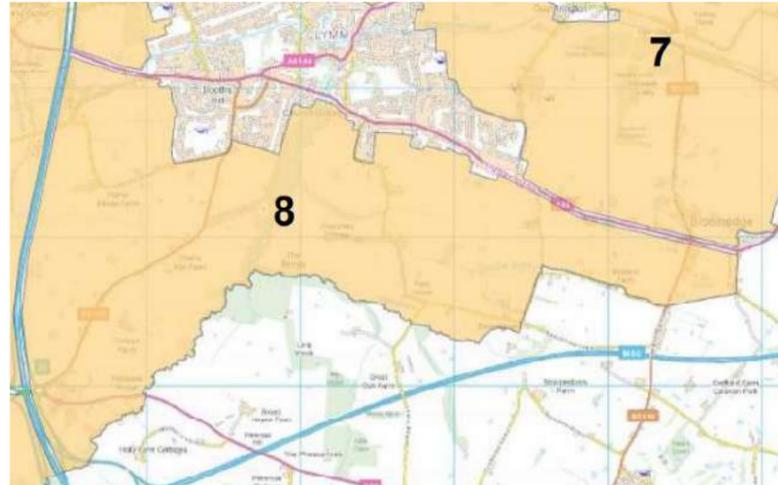
<p><b>Pegasus Site Description:</b> This is one the larger General Areas identified around Warrington and comprises approximately 490 hectares. This General Area border the Local Authority of Trafford to the north east of this parcel.</p>
<p><b>Boundaries:</b> This General Area is bound by the A56 to the south and part of the eastern boundary, the existing edge of Lymm to the west and Birchbrook Road/the River Bollin to the north.</p>
<p><b>Uses:</b> Agricultural, residential, Lymm High School, recreation along the canal</p>
<p><b>Built Form:</b> The settlement of Broomedge, ribbon residential development, agricultural buildings, Pets Animal Hotel, riding school, Lymm High School, Lymm Marina. There are a number of roads within the parcel including the B5169 and B5159 and a series of other smaller and more minor roads.</p>
<p><b>Natural Form:</b> The Bridgewater Canal runs practically horizontally through this parcel. Within this General Area, there is also Spud Wood which is a Park/Garden owned by the National Trust. Agden Brook also runs vertically through this parcel however this is located to the east of the parcel.</p>
<p><b>Public Access:</b> There are a number of PRoW within this parcel including one which runs along the Bridgewater Canal which then links into the settlement of Lymm. As well as this, there is Spud Wood which is open to the public and owned by the Woodland Trust.</p>
<p><b>Other:</b> Locates along either side of the Bridgewater Canal is a Flood Zone 3 area. There are a number of listed buildings within and adjacent to this General Area. There's are in particular located along the canal and along the western boundary with Lymm.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	NC	The GA is not adjacent to the Warrington urban area and therefore does not contribute to this purpose.	NC	Agree - We agree with this rating provided by Arup as the General Area is not connected to the General Area of Warrington and the development of this parcel would not reduce the existing gap.
2. To prevent neighbouring town merging into one another	NC	The GA does not play a role in preventing towns from merging.	WC	Disagree - We disagree with the rating provided by Arup. The development of this General Area would significantly reduce the gap between Lymm and Altrincham to the west. As well as this, the development of this parcel would cause the merging of the large built up area of Warrington with Broomedge and Heatley and reduce the actual and perceived gap between Dunham Massey and the urban area of Warrington. As such, we consider this General Area to have a contribution to this purpose.
3. To assist in safeguarding the countryside from encroachment	SC	The GA is well connected to the open countryside given it is only connected to the inset settlement of Lymm along the western boundary. The boundary between the GA and the inset settlement consists of the limits of development which is not durable and may not be able to prevent encroachment. The boundary between the GA and the open countryside consists of the River Bollin, the A56, Spring Lane and field boundaries. Not all of these features are durable and may not be able to prevent encroachment in the long term. The existing land use predominantly consists of open countryside although includes the washed over village of Broomedge and Heatley as well as Lymm High School and Lymm Marina. The GA supports a moderate to strong degree of openness given that it has less than 20% built form and low levels of vegetation. Overall the GA makes a strong contribution to safeguarding from encroachment	SC	Agree - This parcel is considered to be characteristic of the countryside. It is acknowledged that the settlement of Broomedge and Heatley is located within the parcel however given the size of the parcel, we consider the parcel to be characteristic of the open countryside. The Woodland Trust's property Spud Wood is located within this parcel which provides residents a good opportunity to access the open countryside. There are low levels of vegetation within the General Area which provide long line views and a strong degree of openness. The eastern boundary is not considered to be particularly strong and therefore there is a concern that the development of this parcel would cause encroachment into the open countryside. As such, the General Area makes a strong contribution to this purpose.
4. To preserve the setting and special character of historic towns	NC	Lymm is a historic town however the GA is over 250m from Lymm Conservation Area. The GA does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements. There is very little brownfield land to the south of Warrington and therefore although we do agree that this parcel has a moderate contribution to this purpose, greenfield land is required to address the borough's housing need.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>MC</p>	<p>The GA makes a strong contribution to one purpose, a moderate contribution to one and no contribution to three. Professional judgement has been applied and the GA has been judged to make a moderate contribution overall to the Green Belt. While the boundaries between the GA, Lymm and the open countryside are weak and would not prevent the town from encroaching into the countryside, the GA contains a considerable amount of development including two washed over villages. This compromises its openness and means that the GA does not contribute to the Green Belt in a strong and undeniable way as would be required to make a strong contribution overall. The GA also does not prevent towns from merging, does not check unrestricted sprawl as it is not adjacent to the urban area and does not preserve historic towns as it is not close to the Lymm Conservation Area.</p>	<p>SC</p>	<p>Disagree - The General Area makes a strong contribution to purpose 3, a weak contribution to purpose 2 and NC to Purpose 1. Professional judgement has been applied and this General Area is considered to overall have a strong contribution. The strong contribution that this General Area has in terms of Purpose 3 is significant. The entirety of the eastern boundary is not considered to be permanent or strong and therefore the development of this General Area would cause encroachment into the open countryside. There are a number of opportunities to access the open countryside in this parcel and long line open views. The General Area supports a strong degree of openness and therefore our professional judgement considers this General Area to have an overall strong contribution.</p>
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Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 8



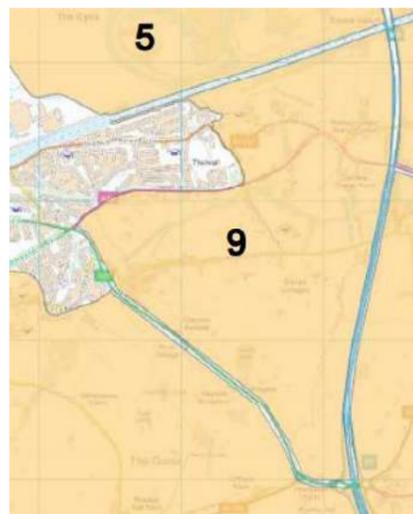
<b>Pegasus Site Description:</b> This General Area is an elongated parcel which comprises 516 hectares of land. This General Area runs to the south of Lymm.
<b>Boundaries:</b> The General Area is bound by a dense wooded tree belt to the south, the M6 to the west, the existing urban edge of Lymm and the A56 to the north and Adgen Park Lane to the east.
<b>Uses:</b> Agricultural buildings/fields, football club, Lymm Dam, Lymm Service Station, residential dwellings including the settlement
<b>Built Form:</b> Lymm Services, Lymm Fire Station, agricultural buildings, residential buildings. There are a series of roads within the parcel including the A50, B5158, and a series of other more minor roads including track roads.
<b>Natural Form:</b> Lymm Dam, Kaylane Brook, Bradley Brook, Mag Brook, Massey Brook. There are some dense wooded areas within the parcel, particularly adjacent to the southern boundary.
<b>Public Access:</b> There are a number of PRoW within the parcel which link the settlement of Lymm to this wider countryside area. As well as this, there a number of opportunities to access the open countryside including Lymm Dam, Lymm Rugby Club.
<b>Other:</b> There are a number of listed buildings (Grade II) within the parcel.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	NC	The GA is not adjacent to the Warrington urban area and therefore does not contribute to this purpose.	NC	Agree - The General Area is not located adjacent to the General Area and therefore this parcel would not contribute towards this purpose.
2. To prevent neighbouring town merging into one another	MC	The GA forms a largely essential gap between the Warrington urban area and Lymm whereby development would significantly reduce the actual distance between the towns without resulting in them merging. The M6 ensures that the separation is retained. Overall, the GA makes a moderate contribution to preventing towns from merging.	MC	Agree - We agree with Arup's comment that the M6 would ensure that the separation between Lymm and the main urban area of Warrington would be retained however the development of this parcel would reduce the actual and perceived gap between the two areas.
3. To assist in safeguarding the countryside from encroachment	SC	The GA is well connected to the open countryside given it is only connected to the inset settlement of Lymm along part of the northern boundary. The boundary between the GA and inset settlement consists of the limits of development which is not durable and may not be able to prevent encroachment. The boundary between the GA and open countryside consists of the M6, the A56, and the heavily tree lined Mag Brook and Bradley Brook which represent durable boundaries. The remainder of the southern boundary consists of field boundaries which are not durable and may not be able to prevent encroachment beyond the GA in the long term if the GA were developed. The existing land use predominantly consists of open countryside although includes part of the washed over village of Broomedge as well as Lymm Services and ribbon development along Massey Brook Lane and The Avenue. The GA supports a moderate degree of openness given that it has less than 20% built form and some areas of dense vegetation around Lymm Dam. Overall the GA makes a strong contribution to safeguarding from encroachment.	SC	Agree - We agree with Arup and consider this General Area to have a strong contribution to this Purpose 3. The parcel is predominantly made up of open countryside. We do recognise that there is the settlement of Broomedge within the parcel however there are significant areas of the parcel which contain no built form. There are some areas of dense vegetation within the General Area which support a moderate degree of openness. There are limited long line views within the parcel however this parcel is considered to be characteristic of the open countryside. As such, overall we consider this parcel to make a strong contribution to safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns	SC	Lymm is a historic town. The GA does not cross an important viewpoint of the Parish Church. The southern section of Lymm Conservation Area is located within the Green Belt in the north of the GA. The GA therefore makes a strong contribution to preserving the setting and special character of historic towns.	SC	Agree - Not only is Lymm is categorised as a historic town, the General Area crosses an important viewpoint of the Parish Church. As well as this, the southern section of the conservation area in Lymm is located within the Green Belt and therefore this General Area is significant with regards to purpose 4.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements. There is very little brownfield land to the south of Warrington and therefore although we do agree that this parcel has a moderate contribution to this purpose, greenfield land is required to address the borough's housing need.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>SC</p>	<p>The GA makes a strong contribution to two purposes, a moderate contribution to two, and no contribution to one. The GA has therefore been judged to make a strong overall contribution to the Green Belt. While the boundaries between the GA, Lymm and the open countryside are largely weak and would not prevent the town from encroaching into the countryside, the M6 forms a strong boundary which prevents further encroachment to the west of the GA and prevents Lymm from merging with the Warrington urban area. The GA also contains a considerable amount of development which compromises its openness. The GA also makes a strong contribution to preserving the Lymm Conservation Area, although this is not significant enough to mean that the GA makes a strong overall contribution.</p>	<p>SC</p>	<p>Agree - Overall, this General Area is considered to make a strong contribution towards protecting the Green Belt purposes. The General Area is crucial in terms of preserving the historic character of Lymm and preventing encroachment into the open countryside. Part of the settlement of Lymm (which is a historic town) is located within the Green Belt and this parcel crosses an important viewpoint of the church. The parcel is characteristic of the open countryside and provides a number of opportunities for residents to access the open countryside. As such, we consider this General Area to make a strong contribution to this purpose.</p>
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Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 9



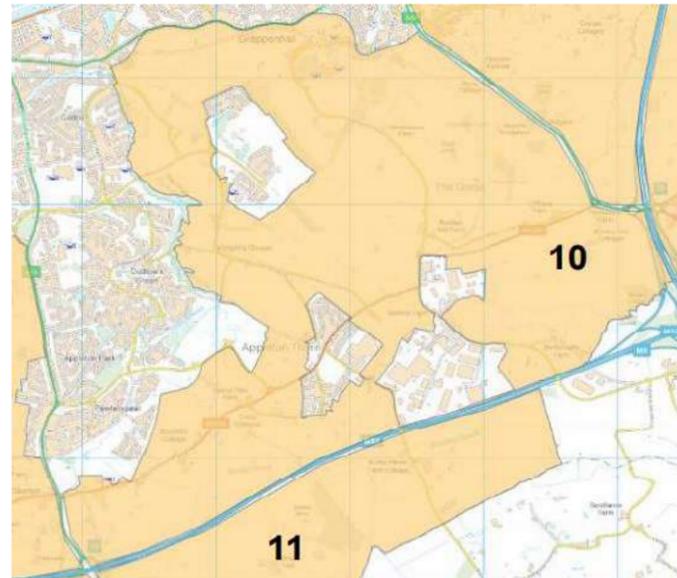
<b>Pegasus Site Description:</b> This GA comprises of 358 hectares of predominantly agricultural land to the south east of the town centre of Warrington.
<b>Boundaries:</b> The parcel is bound by the M6 to the east, Cliff Lane to the south, Knutsford Road, the existing urban edge of Thelwall and Bell Lane to the west and the Manchester Ship Canal to the north.
<b>Uses:</b> Agricultural uses, residential uses, riding school, Stretton Old Hall
<b>Built Form:</b> There is an A Road (A56 Stockport Road) B Road (B5157 Lymm Road) and other minor access within this parcel. In the northern part of this parcel, there is existing built form in the form of residential dwellings, Chaigeley School, a riding centre, a gun club, a recycling centre, car repairs garage, Stretton Old Hall etc.
<b>Natural Form:</b> In terms of natural features, the Bridgewater canal runs through the northern section of the parcel in between Stockport Road and Weaste Lane running from east to west. There are a large number of small ponds within the parcel and Thelwall Brook
<b>Public Access:</b> There are a number of ProW within the northern section of the GA in and around the built form. There are two PROW running vertically through the GA in the southern section however these do not lead to anything and do not appear to be well used.
<b>Other:</b> Within this built form, there are a number of Grade II listed buildings which are located in the northern section of the GA in close proximity to the existing built up area. The top north eastern corner of the GA is made up of a Flood Zone 3 area.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	MC	Bell Lane and Stockport Road (A56) form the western boundary of the GA with the built up area and represent durable boundaries which could prevent sprawl. The GA is only connected to the built up area along the western boundary. There is significant existing ribbon development along Weaste Lane and Stockport Road and the GA plays a strong role in preventing further ribbon development. Overall the GA makes a moderate contribution to checking unrestricted sprawl.	WC	Disagree - The existing boundary between the built up area and the parcel comprises Bell Lane and Stockport Road which are durable boundaries preventing unrestricted sprawl and thus making a weak contribution to this purpose in this regard. The parcel is connected to the existing built up area along the western boundary and overall, the parcel is well contained by strong, durable and permanent boundaries. <b>There is a good opportunity/potential for this parcel to 'round off' development given that there is a significant amount of existing development along Stockport Road, Lymm Road and Bell Lane and therefore the more permanent and durable boundary of the M6 to the east of the parcel would make a logical and durable boundary to prevent future urban sprawl to the east. The parcel is bound by strong, durable boundaries, in particular to the north (Manchester Ship Canal) and the east (M6). Such durable features, such as these, would prevent the unrestricted sprawl of the urban area. Although there is existing ribbon development within the parcel, this is limited to the north section of the parcel and therefore this is not considered to make a stronger contribution to this purpose.</b>
2. To prevent neighbouring town merging into one another	MC	The GA forms a largely essential gap between the Warrington urban area and Lymm whereby a reduction in the gap would significantly reduce the actual distance between the towns albeit would not result in them merging. Furthermore the M6 ensures that separation is retained. Overall the GA makes a moderate contribution to preventing towns from merging.	MC	Agree - The A56 Stockport Road runs from Grappenhall, through the settlement east to west, over the M6 motorway and then into Lymm. When travelling along this road and crossing over the motorway, there is a real sense of leaving one settlement and then entering another settlement. The development of Parcel 9 would not reduce this sense of leaving one settlement and entering into a new settlement. Similarly, within Parcel 9, there is existing built form along the eastern boundary with the M6 and therefore the development of this parcel would not reduce the gap any more than what already exists.
3. To assist in safeguarding the countryside from encroachment	SC	There are durable boundaries between the built up area and the GA which could prevent encroachment. The M6 forms a durable boundary between the GA and the countryside which could prevent encroachment beyond the GA if the GA were developed. The existing land use consists predominantly of open countryside with sparse farm buildings albeit the washed over village of Weaste Lane is located to the western edge of the GA. The GA is well connected to the open countryside along three boundaries and plays a strong role in safeguarding it from encroachment. Overall the GA supports a strong degree of openness given there is less than 10% built form and low level vegetation. Overall the GA makes a strong contribution to safeguarding from encroachment.	SC	Agree - We agree overall with the rating however it is worth noting that there is a significant amount of built form within the northern section of the GA and therefore this does affect the character and setting of the open countryside. We do recognise that the southern section of the GA is more characteristic of the countryside although there aren't significant opportunities to access the open countryside in this location and the PROW do not appear to be well used or connect to the wider open countryside. Given that there is a strong degree of openness in some sections of the parcel and some long line views, we agree with the overall rating.
4. To preserve the setting and special character of historic towns	WC	Warrington is a historic town. The GA crosses an important viewpoint of the Parish Church although it is separated from the historic centre of Warrington and it is not within 250m of the Warrington Town Centre Conservation Areas. The GA therefore makes a weak contribution to this purpose.	WC	Agree - Warrington is recognised as a historic town and therefore should be afforded weight in Green Belt terms. Having said that, the parcel is not within close proximity to any Conservation Areas and therefore overall, the parcel make a weak contribution to this purpose.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements. There is very little brownfield land to the south of Warrington and therefore although we do agree that this parcel has a moderate contribution to this purpose, greenfield land is required to address the borough's housing need.
<u>Justification for assessment and Overall Assessment</u>	MC	The GA makes a strong contribution to one purpose, a moderate contribution to three and a weak contribution to one. Professional judgement has been applied and the GA has therefore been judged to make a moderate overall contribution to the Green Belt. Although the GA makes a strong contribution to safeguarding from encroachment due to its strong degree of openness, it has generally durable boundaries and also makes a weak contribution to preserving the setting of historic towns.	MC	Agree - We agree with the overall rating provided by Arup however we do not consider there to be the same issues with the development of the parcel which have been expressed by Arup. This GA would not cause the sprawl of the large built up area of Warrington as the same existing gap would remain and the parcel is bound by strong durable and permanent boundaries. The southern section of the GA is more open and characteristic of the open countryside in comparison to the northern section which is dominated by built form which will effect the setting and character of the countryside. As such, we agree with the overall rating provided.

Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

Parcel Reference: 10



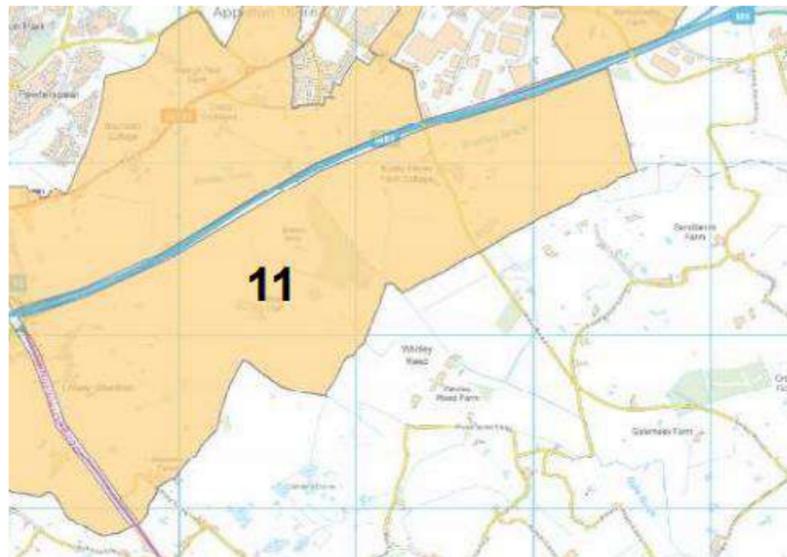
<p><b>Pegasus Site Description:</b> The parcel comprises approximately 923 hectares of agricultural land to the south east of the town of Warrington. The parcel sits adjacent to the settlements of Appleton (to the west) and Grappenhall (to the north). The parcel is predominantly made up of green fields however the Green Belt parcel has been drawn around clusters of built form, including the settlements of Grappenhall Hays, Appleton Thorn and the Stretton Green Distribution Park/Barleycastle Trading Estate/Appleton Thorn Trading Estate.</p>
<p><b>Boundaries:</b> The parcel is bound by the M6 to the south, the M6 slip road/Knutsford Road (A50) to the east, the existing urban edge of Grappenhall to the north and the A56 to the north and the existing urban edge of Appleton to the west.</p>
<p><b>Uses:</b> Agricultural uses, residential dwellings, schools, pubs, nursing home, church, hotel, applejacks adventure</p>
<p><b>Built Form:</b> St Wilfred's Primary School, Grappenhall Scout Centre, pubs, Old Rectory Nursing Home, farms, Park Royal Hotel, St Matthew's church and primary school and some residential dwellings</p>
<p><b>Natural Form:</b> There are a number of dense wooded areas within the parcel as well as smaller streams and watercourses.</p>
<p><b>Public Access:</b> There are a significant number of PRoW's within the parcel which link the settlements to the main urban area of Warrington.</p>
<p><b>Other:</b> The parcel contains 3 scheduled ancient monuments, including: Bradley Hall moated site and two separate sections of Roman road between Appleton and Stretton. There are a number of Grade II listed buildings within the parcel as well as a Grade II* listed building located 90m from the southern boundary of the parcel (Tanyard Farm Farmhouse).</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	WC	The A56 and the canal form a durable northern boundary between the GA and the built up area which could prevent sprawl. Dale Lane and The Dingle (wooded area) form a durable boundary to the west. To the far west B roads and tracks form durable boundaries combined with some less durable boundaries consisting of existing development. The GA is well connected to the built up area along the northern and western boundaries and there is potential for rounding off the settlement pattern if the GA were developed. This would accord with the pattern of the built up area taking into account the historic context of the Green Belt and the intentions of the New Town Outline Plan. There is limited existing ribbon development and the GA has a weak role in preventing further ribbon development. Overall the GA makes a weak contribution to checking unrestricted sprawl.	WC	Agree - Dale Lane and The Dingle (wooded area) form a durable boundary to the west and similarly, the parcel is bound by strong, permanent and durable boundaries to the north, east and west which would prevent unrestricted sprawl. The GA is well connected to the built up area along the northern and western boundaries and there is potential for rounding off the settlement pattern if the GA were developed. The development of this parcel represents a good opportunity for the rounding off of the settlement. There is limited ribbon development within the parcel and therefore overall, the parcel is considered to have a weak contribution to this purpose.
2. To prevent neighbouring town merging into one another	NC	The GA does not play a role in preventing towns from merging.	NC	Agree - We do not consider this parcel/General Area to contribute towards this purpose. The existing settlement of Grappenhall extends eastwards to the north of the parcel. Similarly, there are clusters of existing development and smaller settlements inset within this parcel, including: Appleton Thorn, Grappenhall Hays and Stretton Green Distribution Park/Barleycastle Trading Estate/Appleton Thorn Trading Estate. The development of this parcel would not reduce the existing gap between the Warrington urban area and Lymm/other smaller settlements.
3. To assist in safeguarding the countryside from encroachment	WC	There are mostly durable boundaries between the GA and the Warrington urban area. The boundaries between the GA and the inset settlements are not durable and would not prevent encroachment into the GA. Knutsford Road, the M6, the M56 and London Road form durable boundaries between the GA and the countryside which could prevent encroachment beyond the GA if the GA were developed. The existing land uses consist predominantly of open countryside although includes the washed over villages of Stretton and Grappe hall Village. The GA has limited connections to the open countryside along the eastern boundary and part of the southern boundary. Given that there are inset settlements encompassed by the GA and washed over villages, it therefore only supports a weak degree of openness as a whole. Overall the GA makes a weak contribution to safeguarding from encroachment.	WC	Agree - Appleton Thorn, Grappenhall Hays and the trading estate adjacent to the M56 have been excluded from this General Area however although these are excluded from the Green Belt parcel, the presence of this built form has a significant impact of the character and setting of this parcel and reduces the sentiment of being located within the open countryside. When travelling along the access roads to these settlements and employment areas, there are little in the way of long line views or a strong sense of openness. It is however acknowledged that there are a number of PRoW within the parcel linking the urban areas and a number of parks and recreational areas within the parcel: Grappenhall Sports Club, Grappenhall Cricket Club, Grappenhall Heys Walled Garden. Pegasus agree that Knutsford Road, the M6, the M56 and London Road form durable boundaries between this General Area and the countryside, which could prevent encroachment beyond this area if it was to be developed.
4. To preserve the setting and special character of historic towns	WC	Warrington is an historic town. The GA crosses an important viewpoint of the Parish Church although it is separated from the historic centre of Warrington and it is not within 250m of the Warrington Town Centre Conservation Areas. The GA therefore makes a weak contribution to this purpose.	WC	Agree - Warrington is recognised as a historic town and therefore should be afforded weight in Green Belt terms. Having said that, the parcel is not within close proximity to any Conservation Areas and therefore overall, the parcel make a weak contribution to this purpose.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements. There is very little brownfield land to the south of Warrington and therefore although we do agree that this parcel has a moderate contribution to this purpose, greenfield land is required to address the borough's housing need.
<u>Justification for assessment and Overall Assessment</u>	WC	The GA makes a moderate contribution to one purpose, a weak contribution to three and no contribution to one. The GA has therefore been judged to make a weak overall contribution to the Green Belt. Although the GA makes a moderate contribution to assisting in urban regeneration, it is well connected to the built up area and there is potential for development to represent rounding off of the settlement pattern. Furthermore the GA supports a weak degree of openness with non-durable boundaries which would not prevent encroachment, and it does not contribute to preventing towns from merging.	WC	Agree - In line with the methodology, there is a 3/1/1 split and therefore, overall this parcel is considered to have a weak contribution to Green Belt purposes. The parcel would have a limited impact <b>on the Green Belt, should the parcel be developed for the borough's future housing and employment needs.</b> The parcel is well connected to the existing built up area and represents a rounding off of the settlement pattern.

Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area



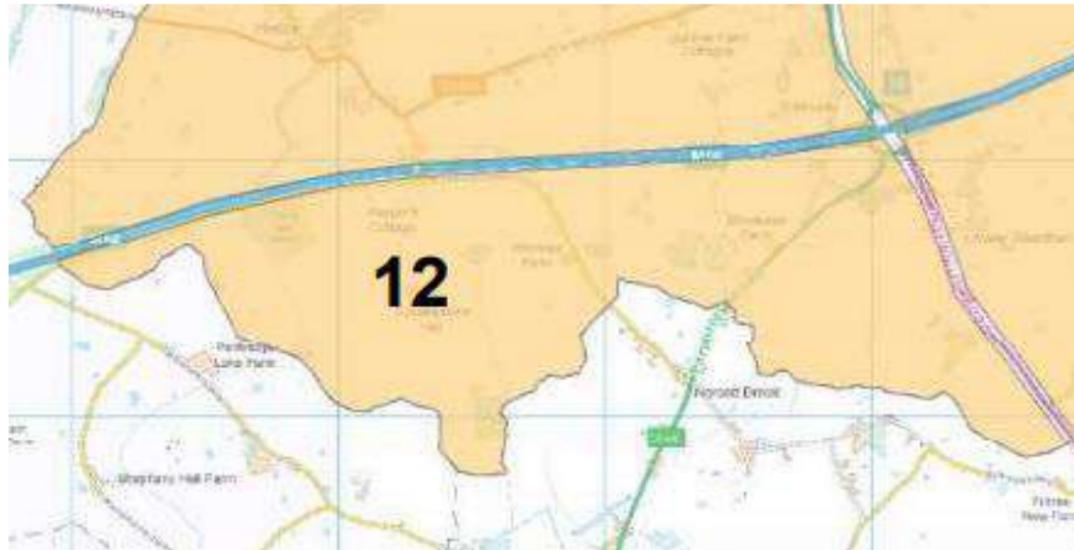
<p><b>Pegasus Site Description:</b> The parcel comprises approximately 380 hectares of agricultural land located to the south of Warrington. This General Area is detached from the main urban area and other settlements in and around Warrington. The General Area borders the Local Authority Area of Cheshire East to the east and Cheshire West and Chester to the south.</p>
<p><b>Boundaries:</b> The General Area is bound by the M56 to the north and the A559 Northwich Road to the west. To the south and east, there are some weak boundaries consisting of minor tracks roads and weak field boundaries. The boundaries are a little unclear in certain locations.</p>
<p><b>Uses:</b> Agricultural uses (farm and associated buildings), residential dwellings</p>
<p><b>Built Form:</b> The smaller settlement of Lower Stretton is included within this General Area (which includes residential dwellings, pub), disused airfield, Applejacks Adventure Farm. There are a number of tracks roads within the General Area.</p>
<p><b>Natural Form:</b> Gale Brook, Stretton Moss, Appleton Moss, the field parcels are bound by hedgerows and trees.</p>
<p><b>Public Access:</b> There are a number of PRoW's within the General Area and some of these lead to the wider open countryside to the south of this General Area.</p>
<p><b>Other:</b> There is a Grade II listed building within the parcel and a two Grade II listed buildings on the western boundary of the parcel.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	NC	The GA is not adjacent to the Warrington urban area and therefore does not contribute to this purpose.	NC	Agree - This General Area is detached from the main urban area of Warrington and therefore this General Area has no contribution to this purpose.
2. To prevent neighbouring town merging into one another	NC	The GA does not play a role in preventing towns from merging.	NC	Agree however.... <b>We agree with the overall rating of this parcel however it is worth noting that the development of this parcel would bring together the smaller settlement of Lower Stretton closer with the settlement of Stretton. Added to this, it would also bring development closer to the Stretton Green Distribution Park which is on the opposite side of the M56. Although we acknowledge that the development of this parcel would reduce the distance between existing built form, it would not cause the coalescence or merging of settlements and therefore overall this parcel is considered to have no contribution to this purpose.</b>
3. To assist in safeguarding the countryside from encroachment	SC	The boundaries between Appleton Thorn (the Barleycastle Trading Estate) and the GA consist of the M56 which represents a durable boundary which could prevent encroachment. The boundary between the GA and the countryside consists of the administrative boundary which follows field boundaries. Some of these field boundaries are not accompanied by other features and do not represent durable boundaries which could prevent encroachment beyond the GA if the GA were developed. The GA is well connected to the open countryside given the only connection to Appleton Thorn is along a section of the northern boundary. The existing land use predominantly consists of open countryside with the former Stretton Airfield to the east of the GA. The GA supports a strong degree of openness given it has less than 10% built form and low levels of vegetation. Overall the GA makes a strong contribution to safeguarding from encroachment.	SC	Agree - This General Area is considered to make a strong contribution to this purpose. The hardstanding area of the disused airfield has a slight impact on the setting of the countryside however it is acknowledged that this is now overgrown and surrounded by vegetation and existing open countryside. As noted in the description section above, the boundaries to the east of the parcel are unclear and not considered to be the most obvious however these follow the local authority boundaries. There are some long line views within the General Area and it supports a strong degree of openness. Although there are some dense wooded areas within the General Area (Appleton Moss and Stretton Moss), overall there are low levels of vegetation and this supports long line views.
4. To preserve the setting and special character of historic towns	NC	The GA is not adjacent to a historic town and does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements. There is very little brownfield land to the south of Warrington and therefore although we do agree that this parcel has a moderate contribution to this purpose, greenfield land is required to address the borough's housing need.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>MC</p>	<p>The GA makes a strong contribution to one purpose, a moderate contribution to one and no contribution to three. Professional judgement has therefore been applied and the GA has been judged to make a moderate overall contribution to the Green Belt. The GA supports a strong degree of openness and its southern and eastern boundaries with the open countryside would not be able to prevent further encroachment if the GA was developed. However, the GA is separated from the urban area by the M6, which is durable enough to prevent sprawl from reaching the GA and development would not lead to towns merging or compromise the setting of any historic towns.</p>	<p>MC</p>	<p>Agree -The General Area overall makes a moderate contribution to this purpose even though it does make a strong contribution towards purpose 3 and is characteristic of the open countryside. There are some significant open long line views from this General Area to the wider open countryside and very limited built form and vegetation. It is also possible to access the wider open countryside to the south from PRoW within this General Area.</p>
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<p>Key - No Contribution (NC)</p>	<p>Weak Contribution - WC</p>	<p>Moderate Contribution - MC</p>	<p>Strong Contribution - SC</p>
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General Area

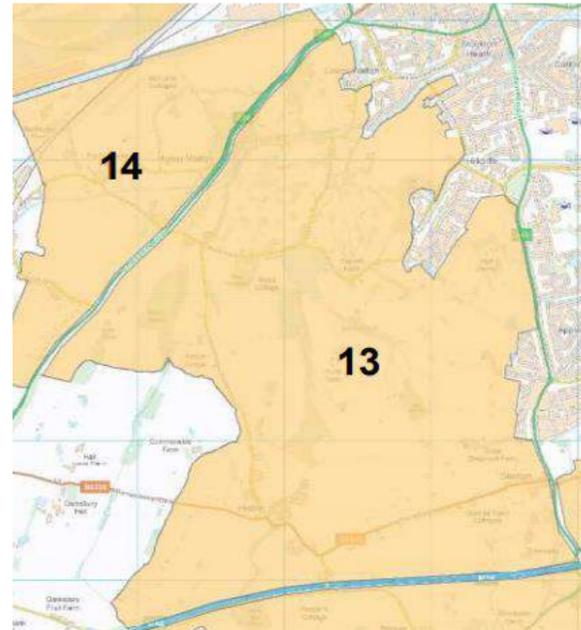


<p><b>Pegasus Site Description:</b> The General Area is an elongated parcel to the south of the main urban Warrington which comprises of 240 hectares of agricultural land. The General Area is bound by the Halton Local Authority borough to the west and Cheshire West and Chester to the south. The General Area boundaries to the west and south follow these boundaries rather than more logical boundaries.</p>
<p><b>Boundaries:</b> The General Area is bound by the M56 to the north and the A559 Northwich Road to the east. As described above, the southern and western boundaries of this General Area follows the Local Authority boundaries and therefore are not the strongest or most definable boundaries. The boundaries are made up of weak tree belts and field boundaries.</p>
<p><b>Uses:</b> Agricultural uses, residential dwellings, pub, petrol station</p>
<p><b>Built Form:</b> The A40 Tarporley Road runs diagonally through the site from north east to south west. There are also some other smaller more minor track roads. There are also a number of farm/agricultural buildings as well as a pub and a petrol station.</p>
<p><b>Natural Form:</b> Owl's Nest Wood, Bradley Brook, a small collect of ponds within the General Area, there are some clusters of vegetation as well as the field parcels being lined with trees and hedgerows.</p>
<p><b>Public Access:</b> PRow run through the General Area which run further north and south of the parcel. There is also the opportunity to access the parcel as part of the Fishery within the General Area.</p>
<p><b>Other:</b> There are 3 listed buildings in the north east corner of this General Area.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	NC	The GA is not adjacent to the Warrington urban area and therefore does not contribute to this purpose.	NC	Agree - This General Area is detached from the main urban area of Warrington and therefore this General Area has no contribution to this purpose.
2. To prevent neighbouring town merging into one another	NC	The GA does not play a role in preventing towns from merging.	NC	<b>Agree however...</b> We agree that the development of this parcel would not cause the coalescence of settlements however it is worth noting that it would cause the merging of the smaller clusters of development of Lower Stretton and Bradley Brook. It would also move development closer to the settlement of Norcott Brook. It is however acknowledged that these are not recognised settlements and that overall the development of this parcel would not cause the merging of towns into one another. On this basis, we agree with the overall rating.
3. To assist in safeguarding the countryside from encroachment	SC	The GA is well connected to the open countryside being completely detached from the settlement thus it has a strong role in safeguarding the countryside. The southern boundary of the GA is not a durable boundary given that it consists of the administrative boundary which follows field boundaries. The existing land use consists of open countryside with some sparsely located farm buildings. The GA supports a strong degree of openness given that it has less than 5% built form and low levels of vegetation. Overall, the GA makes a strong contribution to safeguarding from encroachment.	SC	Agree - This General Area is considered to be characteristic of the open countryside and is completely detached from the main urban area. From within and on the boundaries, there are some long line views and the General Area supports a strong degree of openness. There is very limited built form within the parcel and the built form that does exist in the parcel is related to agricultural use. As stated in the description section, the western and southern boundaries are neither strong or durable to prevent encroachment into the open countryside. As such, this parcel is considered to make a strong contribution to this purpose.
4. To preserve the setting and special character of historic towns	NC	The GA is not adjacent to a historic town and does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements. There is very little brownfield land to the south of Warrington and therefore although we do agree that this parcel has a moderate contribution to this purpose, greenfield land is required to address the borough's housing need.
<u>Justification for assessment and Overall Assessment</u>	MC	The GA makes a strong contribution to one purpose, a moderate contribution to one and no contribution to three. Professional judgement has therefore been applied and the GA has been judged to make a moderate overall contribution to the Green Belt. The GA supports a strong degree of openness and its southern boundary with the open countryside would not be able to prevent further encroachment if the GA was developed. However, the GA is separated from the urban area by the M6, which is durable enough to prevent sprawl from reaching the GA and development would not lead to towns merging or compromise the setting of any historic towns.	MC	Agree - The General Area overall makes a moderate contribution to this purpose even though it does make a strong contribution towards purpose 3 and is characteristic of the open countryside. There are some significant open long line views from this General Area to the wider open countryside and very limited built form and vegetation. It is also possible to access the wider open countryside to the south from PRow within this General Area. There is the potential to give this an overall strong contribution as a result of the contribution it makes to purpose 3 however looking at the other ratings, professional judgement suggests that it would have to be an overall moderate contribution.

Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC
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General Area 13



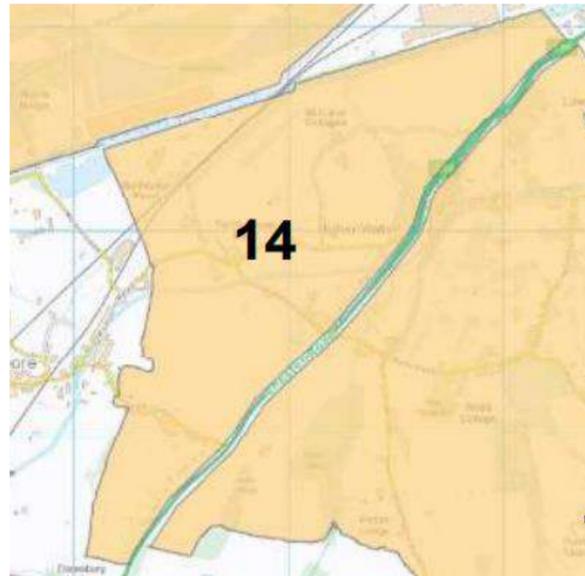
<p><b>Pegasus Site Description:</b> This General Area is one of the largest areas which has been identified around Warrington and comprises approximately 824 hectares of greenfield agricultural land. The General Area is located to the south west of the main urban area of Warrington. Along the western boundary of this area, it appears to follow an odd boundary however this follows the local authority boundary of Warrington. In this location, Warrington borders Halton Borough.</p>
<p><b>Boundaries:</b> The General Area is bound by the M56 to the south, the A49 London Road /existing the main urban area of Warrington to the east and the main urban area of Warrington to the north. Along the western boundary, the General Area is bound part wat by the A56. For the other part, it is field boundaries and agricultural fields. As described above, this does not follow the most logical boundary however it follows the local authority boundary.</p>
<p><b>Uses:</b> Agricultural uses, residential uses, recreation (golf course, riding school, hockey club, Appleton Reservoir, sports club).</p>
<p><b>Built Form:</b> The small settlement of Hatton, Higher Walton, and Daresbury is located within this General Area, ribbon residential development, agricultural buildings, cemetery, crematorium.</p>
<p><b>Natural Form:</b> There are dense wooded areas within the parcel. As well as this, there is vegetation associated round the golf courses and Walton Hall gardens. In terms of water features, there is also Appleton Reservoir in the centre of the parcel and the Bridgewater Canal running horizontally from east to west in the northern section of the parcel.</p>
<p><b>Public Access:</b> There are a few PRow within the area which link to the urban areas as well as to some of the wooded areas. There are also a number of recreational activities within the parcel which provide further opportunities to access the area, including: Warrington Golf Club, Walton Hall GolfCourse, Walton Gardens Hall and Gardens, Warrington Hockey Club, Appleton Reservoir, Church Park, Warrington Sports Club, Riding School</p>
<p><b>Other:</b> There are a number of listed buildings including a cluster in Higher Walton.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	SC	The boundary between the GA and the built up area consists predominantly of the limits of development which do not form durable boundaries, thus the GA plays a strong role in preventing sprawl. Part of the boundary consists of the A49 which does represent a durable boundary. The GA is connected to the built up area along the north eastern and eastern boundaries. There is existing limited ribbon development along Hatton Lane and the GA has a role in preventing further ribbon development. Overall the GA makes a strong contribution to checking unrestricted sprawl.	SC	Agree - This General Area is located immediately adjacent to the main built up area of Warrington and in close proximity to the main built up area of Halton. The development of this parcel would result in the sprawl of the large built up area of Warrington. There is limited ribbon development along the western and southern boundaries of this General Area and therefore this parcel has a strong contribution in preventing the sprawl of the large built up area.
2. To prevent neighbouring town merging into one another	WC	The GA forms a less-essential gap between the Warrington urban area and Runcorn in the adjacent neighbouring authority of Halton, whereby a reduction in the gap would reduce the actual distance between the towns but would not result in them merging. Overall the GA makes a weak contribution to preventing towns from merging.	MC	Disagree - The development of this General Area would result in the merging of the large built up area of Warrington with the smaller settlements of Higher Walton, Daresbury, Hatton and Stretton. Although these are not specifically designated as towns, part of Appleton is located within this parcel (in the south eastern corner of the parcel) and therefore the development of this General Area would result in the coalescence and sprawl of this settlement with the other smaller settlements.
3. To assist in safeguarding the countryside from encroachment	SC	The boundaries between the settlement and the GA are not durable and would not prevent encroachment. The boundary between the GA and the countryside consists of the M56 to the south, the A56 to the north west and the administrative boundary to the west. The administrative boundary does not represent a durable boundary which could prevent encroachment beyond the GA if the GA were developed. The GA is well connected to the open countryside. The existing land use predominantly consists of open countryside although includes the washed over villages of Higher Walton, Hatton and Stretton. Given these are sparsely located the GA supports a strong-moderate degree of openness given it has less than 10% built form and some areas of dense vegetation. Overall the GA makes a strong contribution to safeguarding from encroachment.	SC	Agree - Part of the western boundary is partly made up of the strong definable boundary of the A56 however the more southern part of the western boundary is less durable and follows the Local Authority boundary of Warrington. As such, in this location, the boundary is less durable and would not prevent encroachment into the open countryside. The General Area is well connected to the open countryside with a number of opportunities for local residents to access the open countryside (parks, golf clubs, sport centre, reservoir etc). There is very limited built form within the parcel and it supports a strong degree of openness. With long line views into the open countryside, we agree that this parcel makes a strong contribution to this purpose.
4. To preserve the setting and special character of historic towns	NC	Warrington is an historic town, however the GA is not within 250m of the Warrington Town Centre Conservation Areas nor does it cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements. There is very little brownfield land to the south of Warrington and therefore although we do agree that this parcel has a moderate contribution to this purpose, greenfield land is required to address the borough's housing need.
<u>Justification for assessment and Overall Assessment</u>	SC	The GA makes a strong contribution to two purposes, a moderate contribution to one, a weak contribution to one, and no contribution to one. The GA has been judged to make a strong overall contribution to the Green Belt. It supports a strong-moderate degree of openness, has non-durable boundaries with both the settlement and the countryside and makes a strong contribution to checking unrestricted sprawl and safeguarding from encroachment.	SC	Agree - We agree that this General Area overall makes a strong contribution to Green Belt purposes. Some of the boundaries are not considered to be durable to prevent encroachment into the open countryside. The General Area is characteristic of the open countryside with significant opportunities for the public to access the countryside. Added to this, the development of the General Area would make a strong contribution to check the unrestricted sprawl of the large built up area and the coalescence of some of the smaller settlements within the parcel including Higher Walton, Hatton, Daresbury and Stretton.

Key - No Contribution (NC)	Weak Contribution - WC	Moderate Contribution - MC	Strong Contribution - SC
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General Area 14



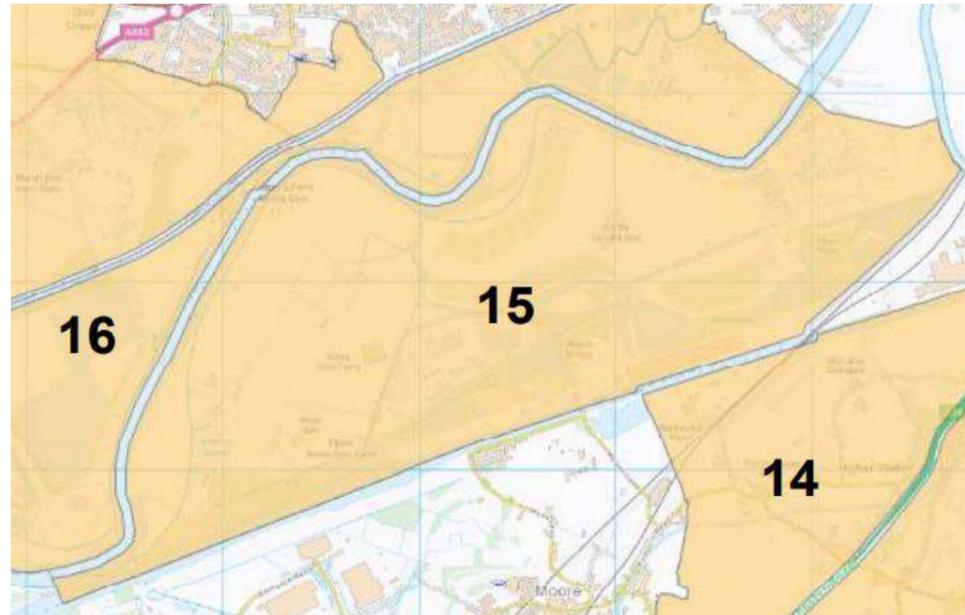
<p><b>Pegasus Site Description:</b> The parcel is located to the south west of the main built up area of Warrington and comprises approximately 240 hectares of agricultural land. The General Area borders the Local Authority area of Halton and part of the western and southern boundaries follow this local authority boundary.</p>
<p><b>Boundaries:</b> The eastern boundary is made up of the A56 Chester Road and the settlement of Higher Walton. The southern boundary and western boundary follows the local authority boundary of Warrington with Halton. This is not considered to be the most robust boundary is made up of fields and some hedgerows. The northern boundary is made up of the Manchester Ship Canal.</p>
<p><b>Uses:</b> Agricultural fields and associated buildings, ribbon residential development</p>
<p><b>Built Form:</b> Railway line which runs through the north western corner of the General Area, sewage works. Ribbon residential development (particularly along Chester Road). There are some more minor access roads located within the parcel.</p>
<p><b>Natural Form:</b> The Bridgewater Canal runs through the parcel and the Manchester Ship Canal runs along the northern boundary. There are some large ponds within the parcel as well as some dense wooded areas.</p>
<p><b>Public Access:</b> Cheshire Ring Canal Walk is located alongside the Bridgewater Canal which allows the public to walk through the General Area.</p>
<p><b>Other:</b> There are number of Grade II listed features located along the Bridgewater Canal. There is a small area which is located in a Flood Zone 3 which is located around the Manchester Ship Canal in the northern section of the General Area.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	MC	The GA has a limited connection to the built up area along the north eastern edge, however this boundary consists of a garden boundary which is not durable and would not be able to prevent sprawl into the GA. The Manchester Ship Canal represents a durable boundary between the GA and the built up area which could prevent sprawl from the north. There is existing limited ribbon development along Chester Road and the GA has a role in preventing further ribbon development. Overall the GA makes a moderate contribution to checking unrestricted sprawl.	SC	Disagree - The development of this parcel would significantly reduce both the actual and perceived distance between the main urban area of Warrington and the built up in the neighbouring authority of Halton. There is a serious concern with development to the west of Warrington that there will be coalescence issues with neighbouring authority urban areas. The development of this parcel would cause the merging of the main urban area of Warrington with Moore (located in Halton). In the very northern corner of the General Area, the main urban area of Warrington has breached the A56 and therefore this parcel is significant in preventing merging.
2. To prevent neighbouring town merging into one another	MC	The GA forms a largely essential gap between the Warrington urban area and Runcorn in the adjacent neighbouring authority of Halton, whereby a reduction in the gap would significantly reduce the actual distance between the towns but would not result in them merging. Overall the GA makes a moderate contribution to preventing towns from merging.	SC	Disagree - We disagree with the rating provided by Arup and consider this General Area to have a strong contribution to this purpose. The development of the General Area would cause the coalescence and the merging of the built up area of Warrington with Moore (located in the local authority area of Halton). In the very northern corner of the General Area, the main urban area of Warrington has breached the A56 and therefore this parcel is significant in preventing merging with Moore.
3. To assist in safeguarding the countryside from encroachment	SC	The boundaries between the settlement and the GA are predominantly durable and could prevent encroachment. The boundary between the GA and the countryside consists of Chester Road (A56) to the south east and the Manchester Ship Canal to the north west, both of which represent durable boundaries. However the western boundary which follows the administrative boundary and is formed by field boundaries and tree lining which does not represent a durable boundary which could prevent encroachment beyond the GA if the GA were developed. The GA is well connected to the open countryside. The existing land use predominantly consists of open countryside with some sparse farm buildings and ribbon development. The GA supports a strong degree of openness given it has less than 5% built form and low levels of vegetation. Overall, the GA makes a strong contribution to safeguarding from encroachment.	SC	Agree - As noted by Arup and above in the description section, the western boundary which follows the administrative boundary and is formed by field boundaries and tree lining does not represent a durable boundary which could prevent encroachment into the countryside. It is noted that the western and northern boundaries however are durable which would prevent encroachment. The General Area has a very limited amount of built form and is considered to be characteristic of the open countryside. The parcel has a strong degree of openness with long line views. The Bridgewater Canal runs horizontally through the General Area with an associated footpath.
4. To preserve the setting and special character of historic towns	NC	Warrington is an historic town, however the GA is not within 250m of the Warrington Town Centre Conservation Areas nor does it cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements. There is very little brownfield land to the south of Warrington and therefore although we do agree that this parcel has a moderate contribution to this purpose, greenfield land is required to address the borough's housing need.
<u>Justification for assessment and Overall Assessment.</u>	MC	The GA makes a strong contribution to one purpose, a moderate contribution to three and no contribution to one. Professional judgement has been applied and the GA has therefore been judged to make a moderate overall contribution to the Green Belt. The GA supports a strong degree of openness with minimal development and the boundaries between the GA and the open countryside are unlikely to be able to prevent encroachment. However, the GA has a limited connection to the built up area and development would not result in the merging of the Warrington urban area and Runcorn.	SC	Disagree - We disagree with the rating provided by Arup and consider this General Area to have a strong contribution towards preventing the sprawl of the large built up area of Warrington with the large built up area of Halton. This parcel is significant in maintaining a gap between these two areas. The western boundaries follow the local authority boundary lines and therefore in places along the western boundary it is weak which would not prevent encroachment into the open countryside. The main urban area of Warrington has already breached the A56 in the northern corner of this parcel and therefore this parcel is critical in preventing urban sprawl, the coalescence of settlement and encroachment into the open countryside.

Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 15



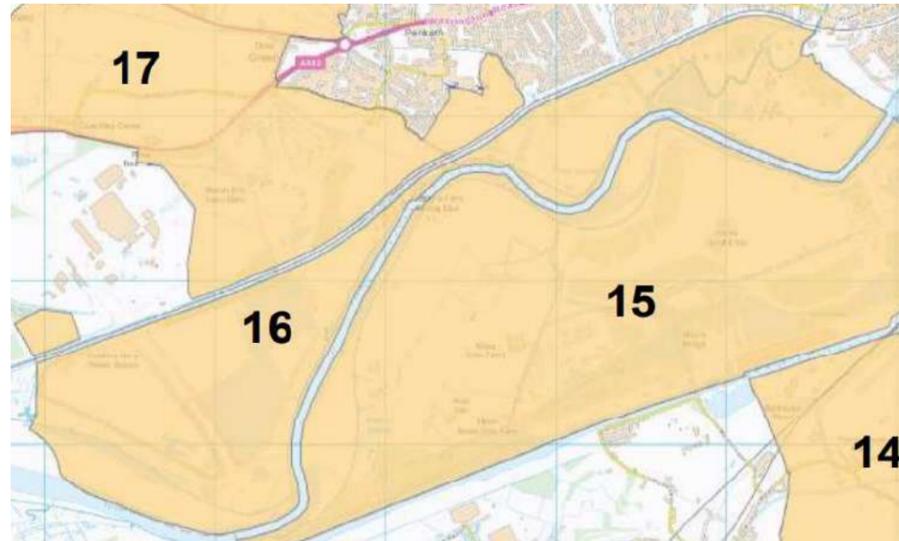
<p><b>Pegasus Site Description:</b> The General Area is a rectangular shaped parcel located to the south west of the main urban area of Warrington and to the south of the River Mersey. The General Area comprises approximately 500 hectares.</p>
<p><b>Boundaries:</b> This General Area is bound by the River Mersey to the north, the Manchester Ship Canal to the west and along the southern boundary and the Manchester Ship Canal and railway line the east.</p>
<p><b>Uses:</b> Nature Reserve, built form associated with the waterworks, the warehouses at the Port of Warrington.</p>
<p><b>Built Form:</b> A disused landing stage, the disused Runcorn and Latchford Canal, Arpley Landfill Site, water tanks and reeds (presumably associated with the adjacent River Mersey), warehouses associated with the Port of Warrington. There are a small number of farm buildings also located within the General Area.</p>
<p><b>Natural Form:</b> Runcorn and Latchford Canal (however this a disused canal). Moore Nature Reserve (there are a number of ponds associated with this nature reserve) and River Mersey (to the northern boundary). There are significant dense wooded areas within the parcel including Norton Wood, Moos Wood, Birch Wood, Manchester Ship Canal runs along the southern boundary of the General Area.</p>
<p><b>Public Access:</b> There is a PRoW which runs along the Manchester Ship Canal along the southern boundary of General Area. This footpath links into the Moore Nature Reserve where there are also footpaths providing access to the open countryside.</p>
<p><b>Other:</b> The majority of this parcel is located within Flood Zone 3.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	WC	The GA has a limited connection to the Warrington urban area along the south eastern edge and therefore plays a weak role in preventing sprawl. The eastern boundary with the built up area consists of an access road which represents a durable boundary however may not be able to prevent sprawl in the long term. The West Coast Railway Line forms the south eastern boundary and represents a durable boundary. Overall the GA makes a weak contribution to checking unrestricted sprawl.	MC	Disagree - Although the parcel is defined by strong durable boundaries (River Mersey and the Manchester Ship Canal) the existing urban edge of Warrington dominates the landscape to the north and the east of the General Area and should this area be brought forward for development, it will significantly increase the built up area of Warrington and move it significantly closer to the large built up area of Halton. There is a significant concern with development in this location with regards to this purpose and purpose 2.
2. To prevent neighbouring town merging into one another	SC	The GA forms an essential gap between the Warrington urban area and Runcorn in the adjacent neighbouring authority of Halton, whereby development of the whole of the GA would result in the actual merging of the towns. Development of the eastern section of the GA would reduce the distance between the towns without result in them merging. Overall the GA makes a strong contribution to preventing towns from merging.	SC	Agree - This General Area is significant in preventing the coalescence of the large built up area of Warrington with the neighbouring authority of Halton. The development of this whole area would result in the actual merging of towns and therefore this parcel has a strong contribution to this purpose.
3. To assist in safeguarding the countryside from encroachment	MC	The GA has a limited connection to the Warrington urban area however has a greater connection to Runcorn within the neighbouring authority along the southern boundary. The Manchester Ship Canal represents a durable boundary between the GA and Runcorn which could prevent encroachment. The River Mersey represents a durable boundary between the GA and the countryside which could prevent encroachment beyond the GA if the GA were developed. The West Coast Main Line represents a durable boundary between the GA and the Warrington urban area which would be able to prevent encroachment into the GA. The existing land use predominantly consists of undeveloped open countryside including a number of wooded areas (Norton Marsh, Birch Wood and Moss Wood) although the Arpley Landfill Site is located in the middle of the GA. Warehouse units are located to the south adjacent to the Manchester Ship Canal. The GA supports a moderate degree of openness given that it has less than 10% built form however has large areas of dense vegetation to the south. Overall the GA makes a moderate contribution to safeguarding from encroachment.	MC	Agree - Although there are warehouses (Port Warrington) located along the southern boundary on the Manchester Ship Canal, overall there is very little built form within the parcel. When looking at the parcel overall, we consider it to be more characteristic of the open countryside. As well as this, Moore Nature Reserve is located within this General Area which provides the opportunity for residents to access the open countryside. When located in the nature reserve, you get a real sense of being within the countryside and no evidence of visibility of any built form. We do recognise that the parcel is bound by strong, durable boundaries which would prevent encroachment beyond the General Area. There are also views from this General Area out towards the river which should also be protected.
4. To preserve the setting and special character of historic towns	NC	Warrington is an historic town however the GA is not within 250m of any of the Town Centre Conservation Areas. The GA does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>MC</p>	<p>The GA makes a strong contribution to one purpose, a moderate contribution to two, a weak contribution to one and no contribution to one. Professional judgement has therefore been applied and the GA has been judged to make a moderate overall contribution to the Green Belt. The GA has a limited connection to the urban area along mostly durable boundaries and therefore only contributes weakly to checking unrestricted sprawl. There are also mostly durable boundaries between the GA and the countryside which could prevent further encroachment and the GA only supports a moderate degree of openness as it contains large areas of dense vegetation to the south. However, the GA contributes strongly to preventing towns from merging as development would result in the merging of the Warrington urban area and Runcorn. The GA also makes a moderate contribution to encouraging brownfield development.</p>	<p>SC</p>	<p>Disagree - We disagree with the overall rating provided by Arup and consider this General Area to have an overall strong contribution to Green Belt purposes. In particular, we consider the General Area to have a strong contribution to purpose 2. Using professional judgement, we consider this to be significant and therefore warrants an overall strong contribution. The development of this area would cause the merging/coalescence of settlements within the Warrington Local Authority area and the Halton Local Authority Area. Although there is built form within the parcel (the warehouses associated with Port Warrington and the landfill), when stood in the centre of the parcel within the nature reserve there is no visibility of this and overall we consider the General Area to be more characteristic of the open countryside.</p>
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Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 16



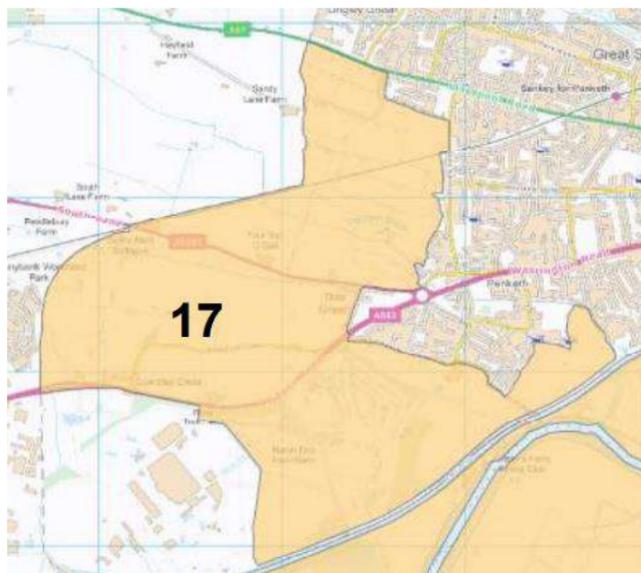
<p><b>Pegasus Site Description:</b> The General Area is located to the south west of the main urban area of Warrington. Along the western boundary, the General Area follows the local authority boundary with Halton. The General Area comprises approximately 298 hectares of land. The parcel is an 'odd' shaped parcel which follows the line of the River Mersey to the south.</p>
<p><b>Boundaries:</b> The General Area is bound by a railway line and the St Helens disused canal along the northern boundary, the River Mersey and an agricultural field/wooded area to the west, the River Mersey to the south and the existing urban edge of Sankey Bridges to the east.</p>
<p><b>Uses:</b> Ferry Station, Park, Sewage Works, recycling centre</p>
<p><b>Built Form:</b> Pipelines and infrastructure associated with the Fiddlers Ferry Station. There are two very large ponds which appear to form part of the Ferry Station. Riverside Trading Estate, recycling centre, sewage works</p>
<p><b>Natural Form:</b> Cuerdley Marsh, disused St Helens Canal which runs along the northern boundary, Sankey Valley Park, Sankey Brook. There are some areas of dense vegetation along the General Area boundary and associated with Sankey Valley park.</p>
<p><b>Public Access:</b> There is a PRoW which runs along the northern boundary of the General Area (the Transpenine Trail). Public can also access the General Area in Sankey Valley Park.</p>
<p><b>Other:</b> There is some Flood Risk 3 areas within the parcel.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	MC	The boundary between the built up area and the GA consists of the St Helens Canal and the Liverpool to Manchester Railway Line along the northern boundary. This represents a durable boundary which could prevent sprawl. The easternmost boundary is not durable and cuts across a wooded area however given the shape of the GA there is potential for rounding off the pattern of the built up area if the easternmost section of the GA was to be developed. The GA is only connected to the built up area along part of the northern boundary and the eastern boundary. Overall the GA makes a moderate contribution to checking unrestricted sprawl.	MC	Agree - The northern boundary is made up of a railway line and the St Helens Canal which is a durable boundary and would prevent sprawl. The western and eastern boundaries however are considered to be less durable and therefore there is the potential for sprawl to occur. We disagree with the comment provided by Arup which suggests that this parcel would provide a rounding off of the settlement. We consider the northern boundary to be durable and would not lend itself to the development of this General Area.
2. To prevent neighbouring town merging into one another	MC	The GA forms a largely essential gap between the Warrington urban area and Widnes in the adjacent neighbouring authority of Halton, whereby a reduction in the gap would significantly reduce the actual distance between the towns albeit would not result in them merging. Furthermore the River Mersey and the St Helens Canal retains the separation between the towns. Overall the GA makes a moderate contribution to preventing towns from merging.	MC	Agree - We recognise that both the St Helens Canal and the River Mersey retains the separation between settlements and prevents their coalescence however, equally this is a significant gap between the urban area of Warrington and the neighbouring authority of Halton.
3. To assist in safeguarding the countryside from encroachment	WC	The GA is partially connected to the countryside along the southern boundary and part of the northern boundary. The eastern side of the GA is connected to the Warrington urban area and durable boundaries could prevent encroachment. The River Mersey forms a durable boundary between the GA and the countryside which could prevent encroachment beyond the GA if the GA were developed. The existing land uses consists of Sankey Valley Park, a Household Waste Recycling Centre and a Sewage Works on the eastern side of the GA with the western side of the GA consisting of Cuerdley Marsh nearly completely occupied by the settling lagoons linked to the Fiddlers Ferry Power Station. Thus there has been already been encroachment into the countryside. The GA supports a weak degree of openness given it has more than 30% built form and some areas of dense vegetation. Overall the GA makes a weak contribution to safeguarding from encroachment.	WC	Agree - Although Sankey Valley Park is located within the General Area, there is clear visibility of existing built form and development and therefore this has an impact upon residents experience of the open countryside. There is also a significant amount of built form within the General Area which impacts upon the setting and character of this area. The existing urban edge of Warrington to the north of this General Area is clearly visible from the General Area.
4. To preserve the setting and special character of historic towns	NC	Warrington is an historic town however the GA is not within 250m of any of the Town Centre Conservation Areas. The GA does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>MC</p>	<p>The GA makes a moderate contribution to three purposes, a weak contribution to one and no contribution to one. The GA has therefore been judged to make a moderate overall <b>contribution to the Green Belt. The GA's eastern boundary with the urban area is not durable,</b> however there is some potential for rounding off in this area. Development of the entire GA would significantly reduce the gap between the Warrington urban area and Widnes. The GA only makes a weak contribution to safeguarding the countryside from encroachment as it already contains a large amount of development and therefore supports a weak degree of openness.</p>	<p>MC</p>	<p>Agree - We agree that overall the General Area makes a moderate contribution to Green Belt purposes. The General Area plays a role in preventing the sprawl of the large built up area of Warrington and prevents the coalescence of nearby settlements. Although the parcel does contain a park within in and provide residents access to the open countryside, the existing urban edge of Warrington and built form is visible which impacts upon the setting and character of the built up area. Overall, the General Area is considered to make a moderate contribution to Green Belt purposes.</p>
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Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 17



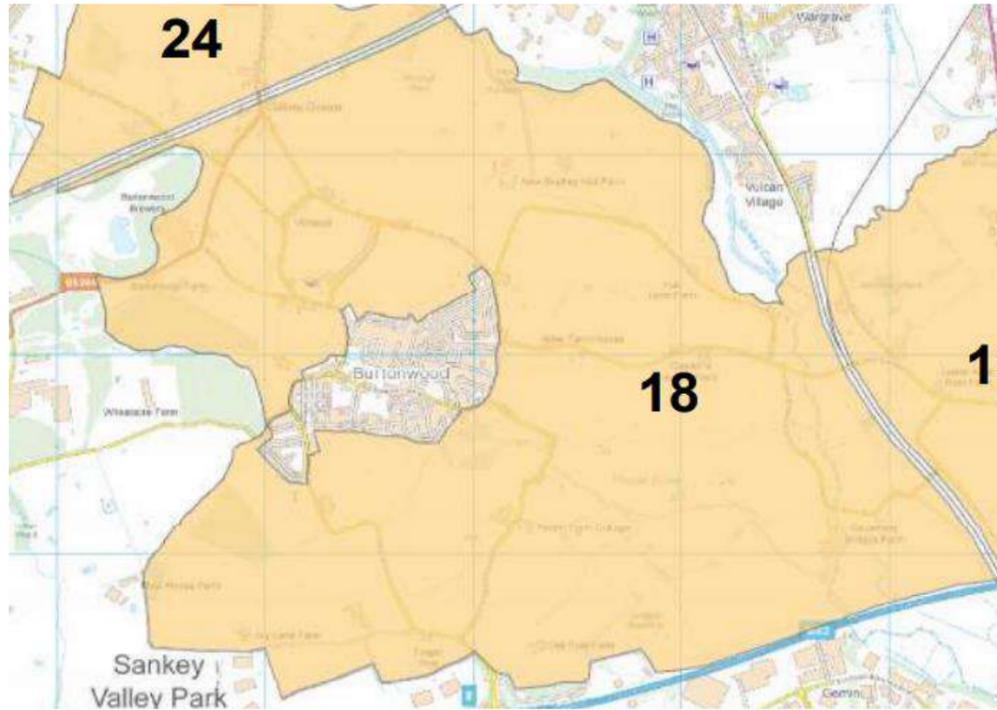
<p><b>Pegasus Site Description:</b> The General Area is located to the west of the main built up area of Warrington and comprises approximately 351 hectares of land. The boundary of this General Area does not follow the most logical or durable boundaries but follows the Local Authority boundaries where Warrington borders with Halton and St Helens.</p>
<p><b>Boundaries:</b> The boundaries which define this General Area do not follow the most obvious or robust boundaries. They are influenced by the neighbouring Local Authority areas of St Helens and Warrington. The General Area is bound by the railway line/the St Helens Canal to the south, the existing urban edge of Warrington (Penketh) to the east and the A57 Liverpool Road/ Warrington Road to the north. To the west, there are a number of boundaries, including; agricultural fields, trees belts and track roads.</p>
<p><b>Uses:</b> Agricultural uses, residential uses</p>
<p><b>Built Form:</b> Very little built form within the General Area. A few residential dwellings and agricultural buildings. The existing urban edge of Warrington is located to the east and the main urban area of Widnes to the west. A railway line runs through the General Area horizontally. This is located in the north section of the General Area.</p>
<p><b>Natural Form:</b> True Fit Golf Centre. The field parcels are bound by hedgerows and trees.</p>
<p><b>Public Access:</b> There are a number of PRoW within the General Area, the majority of which are clustered in the south eastern corner of the General Area linking the main urban area with the River Mersey to the south. True Fit Golf Centre also provides local residents with the opportunity to access the parcel.</p>
<p><b>Other:</b> There are no listed buildings within or immediately adjacent to the General Area boundary however there is a scheduled ancient monument 120m from the western boundary (Heavy Anti-aircraft gun site 380m east of South Lane Farm)</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	SC	The GA is connected to the built up area along the eastern boundary. The boundary between the built up area and the GA consists of the limits of development which does not represent a durable boundary which could prevent sprawl. The GA therefore plays a strong role in preventing sprawl. Overall the GA makes a strong contribution to checking unrestricted sprawl.	SC	Agree - This GA as a whole connects the built up area of Warrington with the built up area of Halton and therefore would result in urban sprawl. There is a concern that large scale development to the west of the urban area of Warrington would cause coalescence.
2. To prevent neighbouring town merging into one another	SC	The GA forms an essential gap between the Warrington urban area and Widnes in the adjacent neighbouring authority of Halton, whereby a reduction in this gap would result in the actual merging of all these towns. Overall the GA makes a strong contribution to preventing towns from merging.	SC	Agree - This General Area overall makes a strong contribution to this purpose. The development of the whole parcel would result in the merging of the existing urban areas of Warrington and Halton however it is accepted that parts of the General Area could be developed without causing the actual or perceived coalescence of settlements. There are parts of the General Area which would result in the rounding off of the settlement as opposed to a coalescence.
3. To assist in safeguarding the countryside from encroachment	MC	The boundaries between the GA, the Warrington urban area and Widnes are not durable and would not prevent encroachment. The Liverpool to Manchester Railway and the St Helens Canal form durable boundaries between the GA and the countryside which could prevent encroachment beyond the GA if the GA was developed. The existing land use consists of undeveloped open countryside, along with a large golf course, meaning that the GA serves a beneficial use of the Green Belt. The GA has a limited connection to the open countryside along two boundaries. The GA supports a strong degree of openness with few areas of dense vegetation. Despite the nondurable boundaries between the GA and settlements, its limited connection to the countryside over mainly durable boundaries means that the GA makes a moderate contribution rather than a strong one. Overall the GA makes a moderate contribution to safeguarding from encroachment.	MC	Agree - Although it is recognised that there is very little built form within the parcel, the General Area is 'sandwiched' between the existing urban area of Warrington to the east and Widnes to the west. This has an impact upon the setting of this General Area and the open countryside. The northern and southern boundaries are durable boundaries which prevent further encroachment into the open countryside. The railway line which runs horizontally through the General Area provides a strong permanent boundary to prevent encroachment into the open countryside. Although the close proximity of the existing urban areas to the east and west, there are a number of opportunities in the southern section of this General Area to access this area including the golf course and the PRoW which enhances the areas contribution to Green Belt purposes and suggests a moderate contribution to this purpose.
4. To preserve the setting and special character of historic towns	NC	Warrington is an historic town however the GA is not within 250m of any of the Town Centre Conservation Areas. The GA does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>SC</p>	<p>The GA makes a strong contribution to two purposes, a moderate contribution to two, and no contribution to one. The GA has therefore been judged to make a strong overall contribution to the Green Belt. Development of the GA would result in the merging of Warrington and Widnes and there are no durable boundaries between the GA and the urban area which could prevent unrestricted sprawl. The GA has a limited connection to the countryside along mostly durable boundaries, however it supports a strong degree of openness.</p>	<p>SC</p>	<p>Agree - Overall we agree with the rating provided by Arup and consider this General Area as a whole to make a strong contribution to Green Belt purposes. We do recognise that there are opportunities within the wider parcel to round off the settlement however the parcel as a whole makes a strong contribution to Green Belt purposes. If the parcel were to be brought forward for development, it would cause the coalescence of two large built up areas. Having said that, the presence of these large built up areas has an impact upon the setting and character of this General Area and the character of the open countryside.</p>
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Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 18



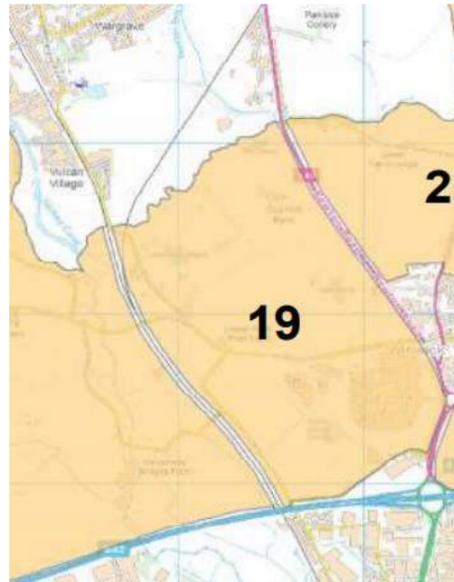
<p><b>Pegasus Site Description:</b> This General Area is located to the north west of the main urban area of Warrington and comprises approximately 528 hectares of land. The settlement of Burtonwood is inset within this General Area.</p>
<p><b>Boundaries:</b> The western boundary of this General Area is not considered to be the most robust or defined by the most definable boundaries as it follows the local authority boundaries. To the west of this General Area is the local authority boundary of St Helens. The General Area is bound by the M62 to the south, a railway line and the existing urban edge of Warrington to the east and a railway line to the north. Given that the General Area follows Local Authority boundaries, the western boundary is not considered to be the most durable or robust boundary. The western boundary is made up of minor tracks roads, wooded areas/tree belts.</p>
<p><b>Uses:</b> Bold Industrial Estate, ribbon residential development, agricultural uses</p>
<p><b>Built Form:</b> The settlement of Burtonwood is located within the centre of this General Area and is inset. There are a number of farms and agricultural buildings within the General Area. There is also ribbon residential development. Along the boundary with the M62, there are a number of large scale distribution centres. These have not been included within the General Parcel area. Bold Industrial Estate is located within the General Areas as well as the small settlement of Collins Wood. There are also a series of roads and more minor track roads located within the General Area.</p>
<p><b>Natural Form:</b> The disused Sankey Canal and the Sankey Brook run outside the eastern boundary in the northern section of the General Area and run into the General Area in the southern section. There is also Phipp's Brook, Moathouse fisheries, nurseries and a number of dense wooded areas within the area.</p>
<p><b>Public Access:</b> There is a very complex and extensive network of PRoW within the General Area linking the main urban area of Warrington to Burtonwood and southwards to the motorway and beyond. Gypsy Wood is located within this General Area which is a Park and Garden.</p>
<p><b>Other:</b> There is a small area located within Flood Zone 3 in the south eastern corner of this General Area. There are a number of listed buildings located along the eastern boundary within the main urban area of Warrington. As well as this, there is a scheduled ancient monument located within the general area (Bradlegh Old Hall Moated site and fishpond).</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	MC	The GA is only connected to the built up area along the southern boundary. This boundary consists of the M62 which represents a durable boundary which could prevent sprawl. Overall the GA makes a moderate contribution to checking unrestricted sprawl.	SC	Disagree - The development of this General Area would result in the sprawl of the main urban area of Warrington with St Helens. As described above, the western boundary of this General Area is follows the local authority boundary of Warrington and therefore is not considered to be the most robust, permanent or durable boundary to sprawl.
2. To prevent neighbouring town merging into one another	SC	The GA forms an essential gap between the Warrington urban area and Newton-le-Willows in the adjacent neighbouring authority of St. Helens, whereby development of the whole of the GA would result in the actual merging of these towns. Overall the GA makes a strong contribution to preventing towns from merging.	SC	Agree - This General Area is an essential gap between the main urban area of Warrington, Burtonwood, Collins Wood and Newton-le-Willows. By developing this area, it would result in the actual coalescence. There is a concern with the development to the north of the Warrington that the merging of settlements will occur and therefore we consider this parcel to be significant in this regard.
3. To assist in safeguarding the countryside from encroachment	MC	The GA contains a mix of durable and nondurable boundaries. The M62 and Sankey Brook form durable boundaries between the GA, Newton le-Willows and the Warrington urban area which could prevent encroachment. The West Coast Main Line and the Liverpool to Manchester Railway form durable boundaries between the GA and the countryside which could prevent encroachment beyond the GA if the GA was developed. However the western boundaries between the GA and the countryside are not durable and would not prevent encroachment beyond the GA if the GA was developed. The GA has a strong connection to the open countryside along two boundaries. The GA contains the inset settlements of Burtonwood and the washed over settlement of Collins Green, which compromise the openness of the GA. The GA contains low levels of vegetation and less than 10% built form. Although the GA is well connected to the open countryside, the GA's openness is compromised by the inset settlement and washed over village and it therefore makes a moderate contribution. Overall the GA makes a moderate contribution to safeguarding from encroachment.	MC	Agree - It is agreed that this General Area is made up of a range of durable and non-durable boundaries. Given that the western boundary follows the local authority boundary, this boundary is not considered to be the most robust and therefore encroachment could occur. The inset settlement of Burtonwood in the centre of the parcel has an impact upon the setting of the countryside in this General Area. Having said that, when comparing the size of the parcel to the amount of built form, there is little built form with the area. The parcel overall is considered to be well connected to the open countryside however the inset settlement and the washed over village does affect this character and breaks up the possibility of long line views.
4. To preserve the setting and special character of historic towns	WC	Newton-leWillows within the neighbouring authority of St Helens is an historic town. The Vulcan Village Conservation Area is located approximately 160m from the northern boundary of the GA. None of the Warrington Town Centre Conservation Areas are located within 250m of the GA and the GA does not cross an important viewpoint of the Parish Church. The GA therefore makes a weak contribution to preserving the special character and setting of historic towns.	WC	Agree - We agree with the comments provided by Arup. We think it is also worth noting that there is also a scheduled ancient monument with the General Area.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.
<u>Justification for assessment and Overall Assessment</u>	MC	The GA makes a strong contribution to one purpose, a moderate contribution to three and a weak contribution to one. Professional judgement has been applied and the GA has therefore been judged to make a moderate overall contribution to the Green Belt. The GA makes a strong contribution to preventing the Warrington urban area and Newtonle-Willows from merging, however the strong boundaries between the GA and the urban area would be able to prevent unrestricted sprawl.	SC	Disagree - We disagree with overall rating provided by Arup. This General Area is considered to make a strong contribution to purposes 1 and 2 in particular. The development of this area would cause the coalescence of the main urban area with neighbouring towns and would result in urban sprawl, given that the western boundary is not particularly durable or permanent. We have a general concern with future development in this location. There is limited room for Warrington to expand without causing the coalescence.

Key - No Contribution (NC)	Weak Contribution - WC	Moderate Contribution - MC	Strong Contribution - SC
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General Area 19



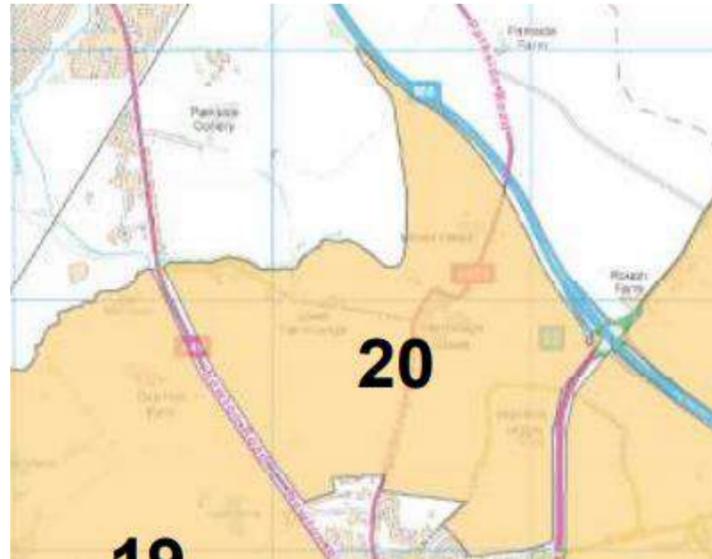
<p><b>Pegasus Site Description:</b> This General Area is located to the north of the main urban area of Warrington and comprises 227 hectares of land. The northern boundary follows the local authority boundary of Warrington. The settlement of Winwick is washed over within this General Area.</p>
<p><b>Boundaries:</b> The northern boundary of the parcel forms the local authority boundary with St Helens. Having said that, this boundary is considered to be fairly durable. It follows the line of Newton Brook. The western boundary is made up a railway line, the southern boundary is made up of the M62 and B&amp;Q and the eastern boundary is made up of the A49. These are considered to be strong durable boundaries.</p>
<p><b>Uses:</b> residential, golf course, agricultural fields</p>
<p><b>Built Form:</b> The inset settlement of Winwick is located within this General Area as well as Hollins Park Hospital. There is built form associated with Alder Root Golf Club and a number of agricultural buildings.</p>
<p><b>Natural Form:</b> Alder Root Golf Club. Newton Brook forms the northern boundary of this General Area. There are also some dense wooded areas within the General Area</p>
<p><b>Public Access:</b> There are no public rights of way within the General Area however given there is the settlement of Winwick and a hospital washed over in this General Area, there is some access to this area for the public.</p>
<p><b>Other:</b> The eastern section of the parcel above the settlement of Winwick forms part of a scheduled battlefield. This dates back to the Battle of Winwick (also known as Battle of Red Bank) 1648. There are also three Grade II listed buildings within the area. There is a Flood Zone 3 area along the northern boundary.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	MC	The GA is only connected to the built up area along the southern boundary. This consists of the limits of development which does not represent a durable boundary. The M62 to the south of this would represent a durable boundary however existing development has already sprawled to the north of this. Overall the GA makes a moderate contribution to checking unrestricted sprawl.	SC	Disagree - We disagree with the rating provided by Arup and consider this parcel to have a strong contribution to this purpose. The main urban area has already breached the M62 with the presence of the B&Q and the settlement of Winwick however there is some evidence of separation and the areas have not completely merged. There is some greenery in between the B&Q and Winwick maintaining the separation. With the development of this General Area, it would cause the sprawl of this area and the actual and perceived coalescence and sprawl of this urban area.
2. To prevent neighbouring town merging into one another	WC	The GA forms a less essential gap between the Warrington urban area and Newton-le-Willows in the adjacent neighbouring authority of St. Helens, whereby a reduction in the gap would reduce the distance between the towns without resulting in them merging. The M62 and the Green Belt separation between Newton-LeWillows and the administrative boundary ensures that separation is retained. Overall the GA makes a weak contribution to preventing towns from merging.	MC	Disagree - We wish to further underline the importance of this parcel and consider it to have a moderate contribution to this purpose. The development of this General Area would reduce the actual and perceived distance between the settlement of Winwick and Vulcan Village/Newton le Willows to the north. Although a minor gap would remain, it would move the settlements significantly closer together. We do not necessarily believe that the administrative boundary would maintain separation and prevent any development in this location.
3. To assist in safeguarding the countryside from encroachment	MC	The West Coast Main Line and the Newton Brook river form durable boundaries between the GA and the countryside on the GA's western and northern sides respectively. The A49 forms a durable boundary between the GA, the countryside and the inset settlement of Winwick. The southern boundary between the GA and the Warrington urban area comprises Delph Lane, a minor road which may not be a durable boundary which could protect encroachment from the adjacent retail park in the long term. The southern section of the GA contains a hospital and a large new washed over housing development which serves as an extension to Winwick. The northern section contains a golf course, meaning that the GA serves a beneficial use of the Green Belt which should be safeguarded. While the GA contains low levels of vegetation, the GA's openness is compromised given that it has over 20% built form. Overall the GA makes a moderate contribution to safeguarding from encroachment.	MC	Agree - The General Area contains the washed over settlement of Winwick as well as Hollins Park hospital. These have an impact on the setting of the countryside and the character of this area. There is also a golf course with the parcel which provides some opportunity for residents to access this parcel. There are some long line views when travelling northbound along the eastern boundary however given the presence of Winwick within the area, there is a notable amount of built form within the General Area.
4. To preserve the setting and special character of historic towns	WC	Newton-leWillows within the neighbouring authority of St Helens is an historic town. The Vulcan Village Conservation Area is located approximately 160m from the northern boundary of the GA. None of the Warrington Town Centre Conservation Areas are located within 250m of the GA and the GA does not cross an important viewpoint of the Parish Church. The GA therefore makes a weak contribution to preserving the special character and setting of historic towns.	WC	Agree - We agree with the rating provided by Arup however it is also worth noting that part of a scheduled battlefield is located along the eastern section of this General Area and this makes a contribution to this purpose.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.
<u>Justification for assessment and Overall Assessment</u>	MC	The GA makes a moderate contribution to three purposes and a weak contribution to two. The GA has therefore been judged to make a moderate overall contribution to the Green Belt. While the boundaries between the GA, the urban area and the countryside are not entirely durable and may not be able to prevent sprawl and encroachment in the long term, the GA makes a moderate contribution to preventing sprawl and safeguarding from encroachment. The GA makes a moderate contribution to assisting in urban regeneration. The GA plays a weak role in preventing the merging of the Warrington urban area and Newton-le-Willows.	SC	Disagree - We disagree with the overall rating provided by Arup and using our professional judgement, as suggested in the methodology, we consider this parcel overall to have a strong contribution to Green Belt purposes. This General Area is particularly important with regards to purpose 1. The development of this General Area would cause the unrestricted sprawl of the main urban area of Warrington and the M62 has already been breached to the north of the motorway which would suggest that there is possibility that this could further sprawl. We have some concerns with the development to the north of Warrington and the close proximity of other large built up areas in this location which would lead to the coalescence of settlements and the sprawl of the built up area.

Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 20



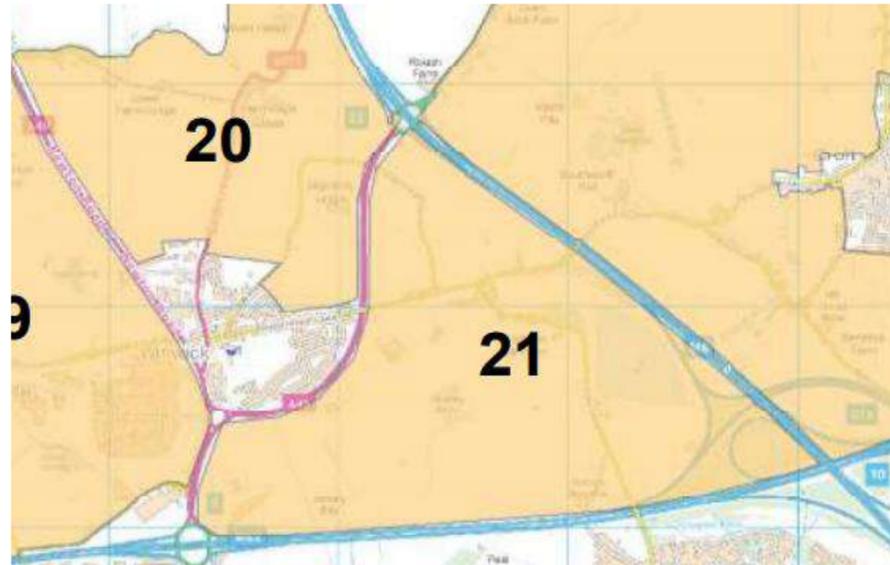
<p><b>Pegasus Site Description:</b> The parcel is located to the north of Warrington urban area and comprises approximately 163 hectares of agricultural land. The northern boundary follows the boundary with the Local Authority borough of St Helens and therefore is not the strongest or most durable of boundaries.</p>
<p><b>Boundaries:</b> The General Area boundaries comprise of the existing urban edge of Winwick to the south, Winwick Link Road and the M6 to the east, field boundaries and hedgerows to the north and the A49 Newton Road to the west.</p>
<p><b>Uses:</b> Agricultural uses, residential uses</p>
<p><b>Built Form:</b> The built form within the parcel consists of the small settlement of Hermitage Green within the centre of the General Area. There are a small number of farms and associated buildings within the General area.</p>
<p><b>Natural Form:</b> Part of the northern boundary of the General Area consists of dense hedgerows/trees/brook. There are also dense wooded areas within the General Area. The GA boundaries, particularly the eastern boundary with the M6 is made up of dense hedgerows.</p>
<p><b>Public Access:</b> There are some PRoW located within this parcel in the southern section of the parcel connecting Winwick with Hermitage Wood. As well as this, there is a PRoW located along side the motorway along the eastern boundary of the General Area.</p>
<p><b>Other:</b> The western part of this General Area, from Golborne Road westwards, is a registered battlefield. This extends to the northern boundary. The battlefield was registered from the Battle of Winwick (also known as Battle of Red Bank) 1648. There is also a scheduled ancient monument within the General Area (St Oswald's Well) which is located slightly to the west of Parkside.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	NC	The GA is not adjacent to the Warrington urban area and therefore does not contribute to this purpose.	WC	Disagree - Although we acknowledge that the General Area is not located immediately adjacent to the main built up area of Warrington, the General Area is located in close proximity to the built up area in the St Helens Local Authority Borough. The development of this parcel is attached the built development of Winwick and would move this built area closer/ merge the gap between Warrington and St Helens.
2. To prevent neighbouring town merging into one another	WC	The GA forms a less-essential gap between the Warrington urban area and Newton-le-Willows in the adjacent neighbouring authority of St. Helens, whereby a reduction in the gap would reduce the actual distance between the towns albeit would not result in them merging given the M62 and the Green Belt separation between Newton-Le-Willows and the administrative boundary. Overall the GA makes a weak contribution to preventing towns from merging.	MC	Disagree - The development of this General Area would significantly reduce the gap between Winwick and Newton-le-Willows. Although we do acknowledge that a small gap would still remain between Winwick and Newton-le-Willows, the actual and perceived distance between these two built up areas would be reduced. Furthermore, although we recognise that purpose 2 seeks to protect the merging of towns into one another however the development of this parcel would cause the merging of Winwick with Hermitage Green.
3. To assist in safeguarding the countryside from encroachment	SC	<b>The A49 and M6 form durable boundaries between the GA and the countryside on the GA's western and eastern sides respectively.</b> The northern boundary between the GA and the countryside comprises an administrative boundary following field boundaries unaccompanied by other features and a small brook. These do not represent durable boundaries which could prevent encroachment beyond the GA if the GA were developed. The southern boundary between the GA and the inset settlement of Winwick follows field boundaries, which are also not durable. The GA is connected to the open countryside on three sides and the existing land use predominantly consists of farm buildings. The GA supports a strong degree of openness given that it has less than 5% built form and low levels of vegetation. Overall, the GA makes a strong contribution to safeguarding from encroachment.	SC	Agree - Although the eastern and western boundaries of the General Area are considered to be robust to prevent encroachment into the open countryside, the northern boundary is made up of the local authority boundary between Warrington and St Helens and therefore is not considered to be the most durable, permanent or strong to prevent encroachment into the open countryside. If this parcel was developed, the northern boundary would not guarantee further encroachment. Furthermore, we agree with Arup's comment that the parcel is connected to the open countryside on three sides and as well as this, there is very little built form within the parcel. Overall, we consider this parcel to be characteristic of the countryside and therefore we consider the general area to have a strong contribution to this purpose.
4. To preserve the setting and special character of historic towns	NC	The GA is not adjacent to a historic town and does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church. It is worth noting however that there is a scheduled battlefield located in the western section of this General Area.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>MC</p>	<p>The GA makes a strong contribution to one purpose, a moderate contribution to one purpose, a weak contribution to one purpose and no contribution to two purposes. Professional judgement has therefore been applied and the GA has been judged to make a moderate overall contribution to the Green Belt. The GA supports a strong degree of openness and some of the boundaries between the GA, Winwick and the countryside are not durable and would not prevent encroachment. However, the GA makes a weak contribution to preventing towns from merging and makes no contribution to checking unrestricted sprawl as it is not adjacent to the urban area. The GA also does not help to preserve the setting of historic towns.</p>	<p>SC</p>	<p>Disagree - We have used our professional judgement to determine the overall contribution of this parcel. We have some concerns with the development of this General Area and consider there to be some issues with the merging of towns. There is very limited space to the north of the built up area of Warrington and there are some concerns/issues with the merging of settlements and merging of local authority areas. The General Area is also considered to be well connected and characteristic of the open countryside. The northern boundary is not considered to be particularly robust and therefore this parcel is significant in preventing encroachment into the countryside. There is very limited built form with the parcel and is connected to the countryside on three sides of the General Area. Although it is not connected to the main built up area of Warrington, the development of the General Area would seem to increase this General Area.</p>
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Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 21



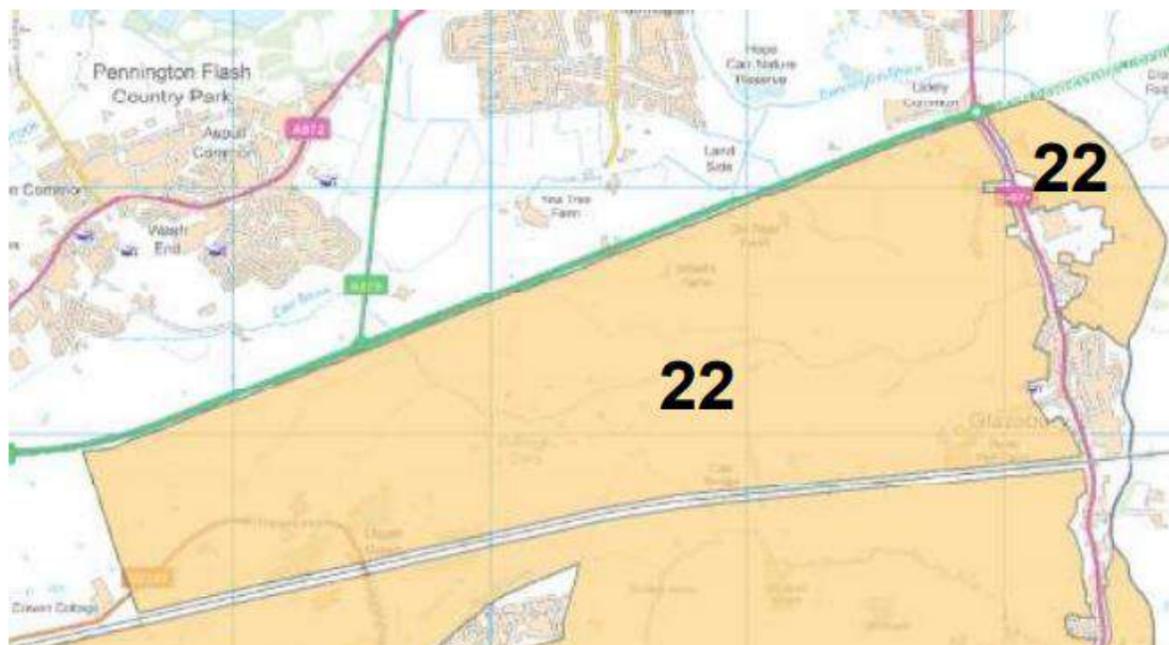
<b>Pegasus Site Description:</b> The General Area is located to the north of the main urban area of Warrington and comprises approximately 244 hectares of agricultural land.
<b>Boundaries:</b> The General Area is bound by the M62 to the south, the M6 to the east and north and the A49 Winwick Link Road to the west.
<b>Uses:</b> Agricultural uses, ribbon residential development along Myddleton Lane/Southworth Lane/Delph Lane, Hollins Country Club
<b>Built Form:</b> The former Hollins Country Club is located in the south eastern section of the GA. This dissolved in 2014 and we are lead to believe that this is now a private hospital. There is a cluster of development in this location including a motoring school. As well as this built form, within the GA there is also: Myddleton Hall, part of the road network of the M6 and M62 is included within the south eastern corner of this General Area. There are some track/access roads within the General Area.
<b>Natural Form:</b> The wooded area of Gorse Brook, Houghton Pool, Spa Brook. There are some dense wooded areas within the General Area. This is particularly prevalent around the road infrastructure and junction of the M6/M62 which is surrounded by a dense wooded area. (Cockshot Burn).
<b>Public Access:</b> There are a number of PRow within the General Area which link to the wider countryside to the north and also to the existing urban area to the south.
<b>Other:</b> There is a scheduled ancient monument within the General Area (Bowl barrow west of Highfield Lane). There is also a couple of listed buildings, including: Myddleton Hall (Grade II*). The part of the General Area which is made up of Houghton Pool is within a Flood Zone 3 area.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	MC	The GA is connected to the built up area along the southern boundary. This consists of the M62 which represents a durable boundary which could prevent sprawl. Overall the GA makes a moderate contribution to checking unrestricted sprawl.	SC	Disagree - We agree that this General Area is connected to the built up area of Warrington along the southern boundary and the development of this parcel would cause the urban area of Warrington to sprawl northwards and towards the large built up area of St Helens/Newton-le-Willows. Although the M62 is a strong durable boundary which would prevent sprawl from the south, the land to the south of this boundary is not designated as Green Belt land and therefore it is possible that this land would come forward for development over time. This parcel therefore is even more important in preventing the sprawl of the built up area of Warrington.
2. To prevent neighbouring town merging into one another	WC	The GA forms a less essential gap between the Warrington urban area and Newton-le-Willows in the adjacent neighbouring authority of St. Helens, whereby a reduction in the gap would reduce the actual distance between the towns albeit would not result in them merging. The M6 and the Green Belt between Newton-LeWillows and the administrative boundary retains separation. Overall the GA makes a weak contribution to preventing towns from merging	MC	Disagree - This GA forms a gap between Houghton Green, Winwick Quay and Winwick. The development of this parcel would cause the merging of these settlements/urban areas. Although we do acknowledge that the M62 sits in between the Winwick Quay and Houghton Green so would not officially cause the actual merging, you would feel as though these areas have merged. As such, this GA is considered to make a moderate contribution to this purpose.
3. To assist in safeguarding the countryside from encroachment	MC	The M6, M62 and A49 form durable boundaries between the GA and the countryside on all three sides which could prevent encroachment beyond the GA if the GA was developed. The M6 forms a durable boundary between the GA and the Warrington urban area and the A49 forms a durable boundary between the GA and the inset settlement of Winwick which could prevent encroachment. The GA is connected to the open countryside along its north-eastern side and partially along its north-western and southern sides. The existing land use predominantly consists of open countryside with a private hospital lying in the south-western corner of the GA and a small number of residential properties and farms. The GA supports a strong degree of openness given it has less than 5% built form and low levels of vegetation. Overall, the GA makes a moderate contribution to safeguarding from encroachment	MC	Agree - We agree that the parcel is bound by strong, permanent and durable boundaries which would prevent encroachment into the wider open countryside. The GA comprises limited built form within it however the south eastern corner of the GA contains significant road infrastructure associated with the M6 and M62. There is limited built form within the parcel however the urbanising influences to the west and to the south impact upon the setting of the countryside.
4. To preserve the setting and special character of historic towns	NC	Warrington is an historic town however the GA is not within 250m of any of the Town Centre Conservation Areas. The GA does not cross an important viewpoint of the Parish Church	NC	Agree - We do agree with the overall rating provided by Arup however it is worth noting that there is a scheduled ancient monument within the parcel as well as a Grade II* listed building. Although we do not consider this to increase the overall rating of the contribution to this purpose, this should be taken into consideration under this purpose.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
<u>Justification for assessment and Overall Assessment</u>	MC	The GA makes a moderate contribution to three purposes, a weak contribution to one purpose and no contribution to one purpose. The GA has therefore been judged to make a moderate overall contribution to the Green Belt. The GA has durable boundaries which would prevent sprawl from the urban area and prevent further encroachment from development, The GA makes a weak contribution to preventing the merging of the Warrington urban area and Newton-le-Willows and the GA does not contribution to preserving the setting of historic towns.	SC	Disagree - This General Area is significant in preventing the sprawl of the large built up area of Warrington. Although we acknowledge that the GA is bound by strong and permanent boundaries, existing development abuts the GA to the east and the south and therefore this parcel prevents the sprawl of the large built up area of Warrington. We have some concerns with development to the north of the settlement particularly with regards to Purpose 1 and 2.

Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 22



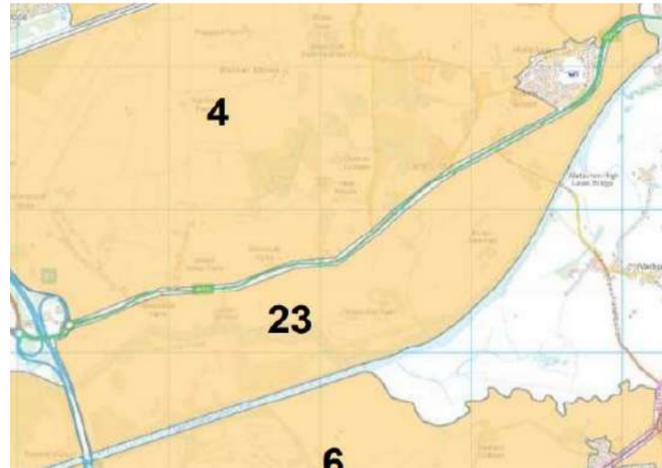
<p><b>Pegasus Site Description:</b> The General Area is located the furthest north from the existing urban area of Warrington and comprises approximately 416 hectares of agricultural land.</p>
<p><b>Boundaries:</b> The eastern and western boundaries of the General Area are not considered to be the most robust, strong or permanent boundaries and follow the Local Authority boundaries with the neighbouring authority of Wigan. The GA is bordered by the following boundaries: The A580 to the north, a railway line to the south, a dismantled railway line which is bound on either side by trees and hedges and Glaze Brook river to the east.</p>
<p><b>Uses:</b> Agricultural uses, residential uses, storage, garden centre, campsite</p>
<p><b>Built Form:</b> Culcheth Carrs - In WWII, a ammunition storage facility was constructed on Culcheth Carrs, accessed from a railway line (now closed) to the west). This facility is now in private ownership, with concrete bunkers surrounded with soil is still in use as storage. It now has a prominent row of lightening conductors along the roofs. The name Culcheth Carrs refers to the large marshy area in which the store was built, drained by Carr Brook. There is also Laylands Farm campsite within the parcel. The settlement of Glazebury, Leigh End and Lately Common are also included within this GA and Bents Garden Centre. There are also a numbers of farms and associated buildings within the GA.</p>
<p><b>Natural Form:</b> Carr Brook which runs through Culcheth Carrs and Pennington Brook runs along the eastern boundary. There are a number of field parcels within the GA which are bound by trees and hedgerows. The disused railway along the western boundary is also bound by dense trees and hedgerows.</p>
<p><b>Public Access:</b> There are a large number of PRow within this parcel which link further north to the wider countryside and other settlements and the south. There is also a campsite within the GA which provides further opportunities for local residents to access the GA. There is also a garden centre and a recreation ground within the GA.</p>
<p><b>Other:</b> There are some Flood Risk issues within this GA. The north eastern corner is Flood Zone 3 with associated flood defences. An area in the centre of the GA is Flood Zone 2. There is a Grade II* listed building within this GA in the south eastern corner of the parcel. There are also two other Grade II listed buildings in this area of the GA.</p>

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	NC	The GA is not adjacent to the Warrington urban area and therefore does not contribute to this purpose	WC	Disagree - Although the parcel is not adjacent to the main urban area of Warrington and this built up area, it would make a contribution towards the sprawl of the built up areas of Leigh and Lowton. Having said that, the A580 sits in between these areas and a gap would still be retained.
2. To prevent neighbouring town merging into one another	MC	The GA forms a largely essential gap between Culcheth and Leigh and Lowton in the adjacent neighbouring authority of Wigan, whereby a reduction in the gap would significantly reduce the actual distance between the towns albeit would not result in them merging. Development in the western section of the GA would significantly reduce the gap between Lowton and Culcheth, while development in the eastern section of the GA would reduce the gap between Leigh and Culcheth. Overall the GA makes a moderate contribution to preventing towns from merging.	MC	Agree - We agree that this GA forms an essential gap between Culcheth, Leigh and Lowton. We agree that technically a gap would still occur and the A580 would prevent the settlements coalescing however it would move the settlements closer together and the perceived distance would also decrease.
3. To assist in safeguarding the countryside from encroachment	SC	The A580, Liverpool to Manchester railway line and the Glaze Brook river form durable boundaries between the GA and the countryside on three sides which could prevent encroachment beyond the GA if the GA was developed. The western boundary of the GA follows a disused railway line which is not durable and would not prevent encroachment. The <b>GA's boundaries with the inset settlement of Glazebury are generally field boundaries which are not accompanied by other features, and are not durable and would not prevent encroachment.</b> The GA is well connected to the open countryside along all four boundaries. The GA supports a strong degree of openness given it has less than 10% built form and low levels of vegetation. Overall the GA makes a strong contribution to safeguarding from encroachment.	SC	Agree - This GA makes a strong contribution to this purpose and we agree with the rating provided by Arup. The GA is surrounded by the countryside on four sides and is considered to be characteristic of the countryside. There is a significant network of PRow within this GA as well as a campsite, garden centre and recreation ground associated with the school which provide a number of opportunities for residents to access the GA. Although the settlement of Glazebury and the smaller clusters of built form in Lately Common and Leigh End are located within this GA, the GA is still considered to be more characteristic of the countryside. The western edge of the GA is not considered to be durable and therefore it is highly likely that encroachment into the open countryside would occur. Although the northern and southern boundaries are durable, there is a strong degree of openness and long line views and therefore we consider the GA to have a strong contribution to this purpose.
4. To preserve the setting and special character of historic towns	NC	The GA is not adjacent to an historic town and does not cross an important viewpoint of the Parish Church	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>MC</p>	<p>The GA makes a strong contribution to one purpose, a moderate contribution to two and no contribution to two. Professional judgement has therefore been applied and the GA has been judged to make a moderate overall contribution to the Green Belt. While the GA is not adjacent to the urban area and therefore does not contribute to checking unrestricted sprawl, it is well connected to the open countryside and supports a strong degree of openness. The <b>GA's western and eastern boundaries could not prevent encroachment, while development of the GA would significantly reduce the gap between Culcheth Leigh and Lowton without resulting in them merging.</b> The GA does not help to preserve any historic towns</p>	<p>MC</p>	<p>Agree - The GA has been judged to make a strong contribution overall to Green Belt purposes. Whilst the GA is not located adjacent to the urban area of Warrington, there is some concerns with the merging of Culcheth with Leigh and Lowton. Added to this, the development of this parcel would contribute towards the sprawl of the large built up areas of Leigh and Lowton. There is limited place to extend to the north of Warrington without raising some concerns with merging of settlements and the sprawl of large built up areas. This GA is characteristic of the open countryside and there is a concern that given the western boundary is not robust, encroachment of the countryside could occur. Furthermore, there are a number of opportunities to access this GA including an extensive network of PRoW.</p>
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Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 23

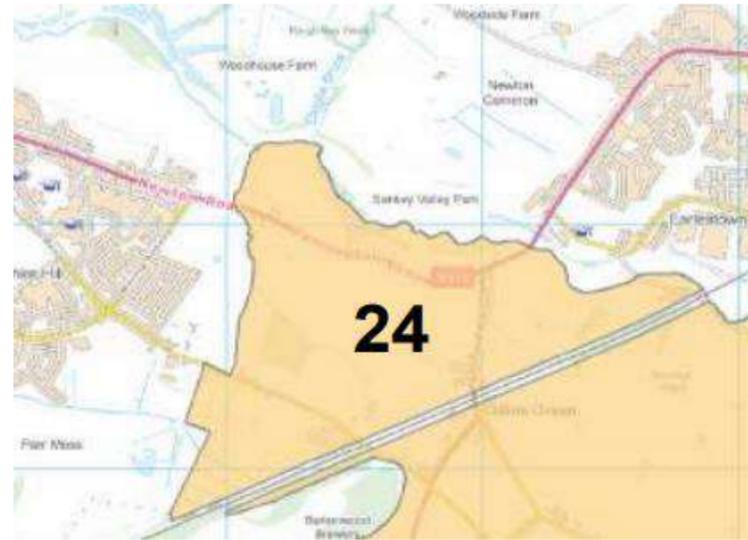


<b>Pegasus Site Description:</b> The GA is located the east of the main urban area of Warrington and comprises approximately 308 hectares of agricultural land. In the east, the GA borders the LPA areas of Salford and Trafford.
<b>Boundaries:</b> The eastern boundary of the GA follows the local authority boundaries with Trafford and Salford. The GA is bound by the A57 Manchester Road to the north, the M6 to the east, the Manchester Ship Canal to the south and the A57 Manchester Road to the east.
<b>Uses:</b> Landfill, Biffa Waste Services, Caravan Park, agricultural uses.
<b>Built Form:</b> Biffa Waste Services, Hollybank Caravan Park, Warburton Toll Bridge, Landfill site
<b>Natural Form:</b> There are some dense wooded areas within the GA which are located both on the boundaries and within the GA. Part of the River Mersey runs horizontally through the GA and connects up with the Manchester Ship Canal along the southern boundary.
<b>Public Access:</b> There is limited public access to the GA. There is a small link route within the north western corner however there is no access to the wider parcel other than to the caravan park located along the northern boundary.
<b>Other:</b> Rixton Old Hall Moated Site is a scheduled ancient monument and is located within the GA. It is estimated that just under 50% of the GA is within a Flood Zone 3 area.

Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	WC	The GA has a limited connection to the built up area at its north western tip. The durable boundary of the junction of the A57 and M6 could prevent sprawl in this location. Overall the GA makes a weak contribution to checking unrestricted sprawl	MC	Disagree - The very edge of the urban area of Warrington is located in the north western corner of this GA and therefore the development of this parcel would cause the sprawl of the built up area of Warrington. It is acknowledged that the M6 motorway and the A57 are strong durable boundaries which would prevent this happening however the built up area of Warrington is immediately adjacent to this GA.
2. To prevent neighbouring town merging into one another	SC	The GA forms an essential gap between the Warrington urban area and Cadishead in the adjacent neighbouring authority of Salford, whereby development of the GA would result in the actual merging of these towns. Limited development in the western section of the GA would not result in the merging of towns. Overall the GA makes a strong contribution to preventing towns from merging.	SC	Agree - We agree that the General Area forms an essential gap between the urban area of Warrington and the neighbouring authority of Salford (Cadishead). The development of this GA would result in the actual coalescence of settlements and therefore this GA is considered to have a strong contribution to this purpose.
3. To assist in safeguarding the countryside from encroachment	SC	The M6, A57 and the Liverpool to Manchester railway line form durable boundaries between the GA and the countryside which could prevent encroachment beyond the GA if the GA was developed. In addition, the junction of the M6 and the M57 in the GA's north western corner form a durable boundary between the GA and the Warrington urban area, the A57 forms a durable boundary between the GA and the inset settlement of Hollins Green in the GA's northern corner and the Glaze Brook river forms a durable boundary between the GA and Cadishead in the GA's north-eastern which would prevent encroachment. The GA is well connected to the open countryside along three boundaries. The GA supports a strong degree of openness given it has less than 10% built form and only moderate levels of vegetation. Overall the GA makes a strong contribution to safeguarding from encroachment	SC	Agree - Despite the GA being made up of strong durable boundaries to prevent encroachment into the countryside, should the parcel be developed, it would have an impact on the setting and character of the countryside and therefore would cause encroachment. Overall, the GA has limited built form. Although there are some areas of dense vegetation, there is still a strong degree of openness and long line views and therefore we consider this GA to have a strong contribution to this purpose.
4. To preserve the setting and special character of historic towns	NC	Warrington is a historic town however the GA is not within 250m of any of the Town Centre Conservation Areas. The GA does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.
<b>Justification for assessment and Overall Assessment</b>	SC	The GA makes a strong contribution to two purposes, a moderate contribution to one, a weak contribution to one and no contribution to one. The GA has therefore been judged to make a strong overall contribution to the Green Belt. While the GA has a limited connection to the urban area and the A57 and M6 would prevent sprawl, development of the GA would lead to the merging of the Warrington urban area and Cadishead. In addition, the GA is well connected to the countryside and supports a strong degree of openness.	SC	Agree - We agree with the overall rating provided by Arup and consider this GA overall to have a strong contribution to Green Belt purposes. The development of this GA would cause the merging of the main urban area of Warrington with the neighbouring authority of Salford. The parcel is considered to be well connected to the countryside with a strong degree of openness. The GA has limited built form and therefore we consider it to have an overall strong contribution to Green Belt purposes.

Key - No Contribution (NC)    Weak Contribution - WC    Moderate Contribution - MC    Strong Contribution - SC

General Area 24



<p><b>Pegasus Site Description:</b> This GA is located to the far north of the Warrington Local Authority borough and detached from the main urban area. The GA is made 130 hectares of agricultural land.</p>
<p><b>Boundaries:</b> The northern, eastern and western boundaries follows the local authority boundary of Warrington. This borders the neighbouring authority of St Helens. The southern boundary is made up of a railway line, the eastern and northern boundary is Sankey Brook, and the western boundary is made up of tree belts, hedgerows and fields. This is not considered to be the most robust or permanent boundary.</p>
<p><b>Uses:</b> Agricultural uses, residential uses</p>
<p><b>Built Form:</b> The A572 Pennington Lane, the B5204 Penkford Lane, Broad Lane, residential home, residential dwellings, farm buildings. There appears to be a waste disposal area within the centre of the GA.</p>
<p><b>Natural Form:</b> Burtonwood Moss, nursery, Sankey Brook (along the eastern/northern boundary), disused mine. There are some dense wooded areas within the GA and particularly associated with Sankey Brook along the eastern/northern boundary. Along the western boundary, a small section of Colliers Moss Wood is located within the GA.</p>
<p><b>Public Access:</b> Part of GA is made up of Colliers Moss Common which is used by the local residents and provides public access to the GA. There are some footpaths associated with this in the western section of the GA which provides access to the wider GA.</p>
<p><b>Other:</b> There is a Grade II listed building located within the GA along Penkford Lane. There is Flood Zone 3 area along the eastern boundary associated with Sankey Brook.</p>

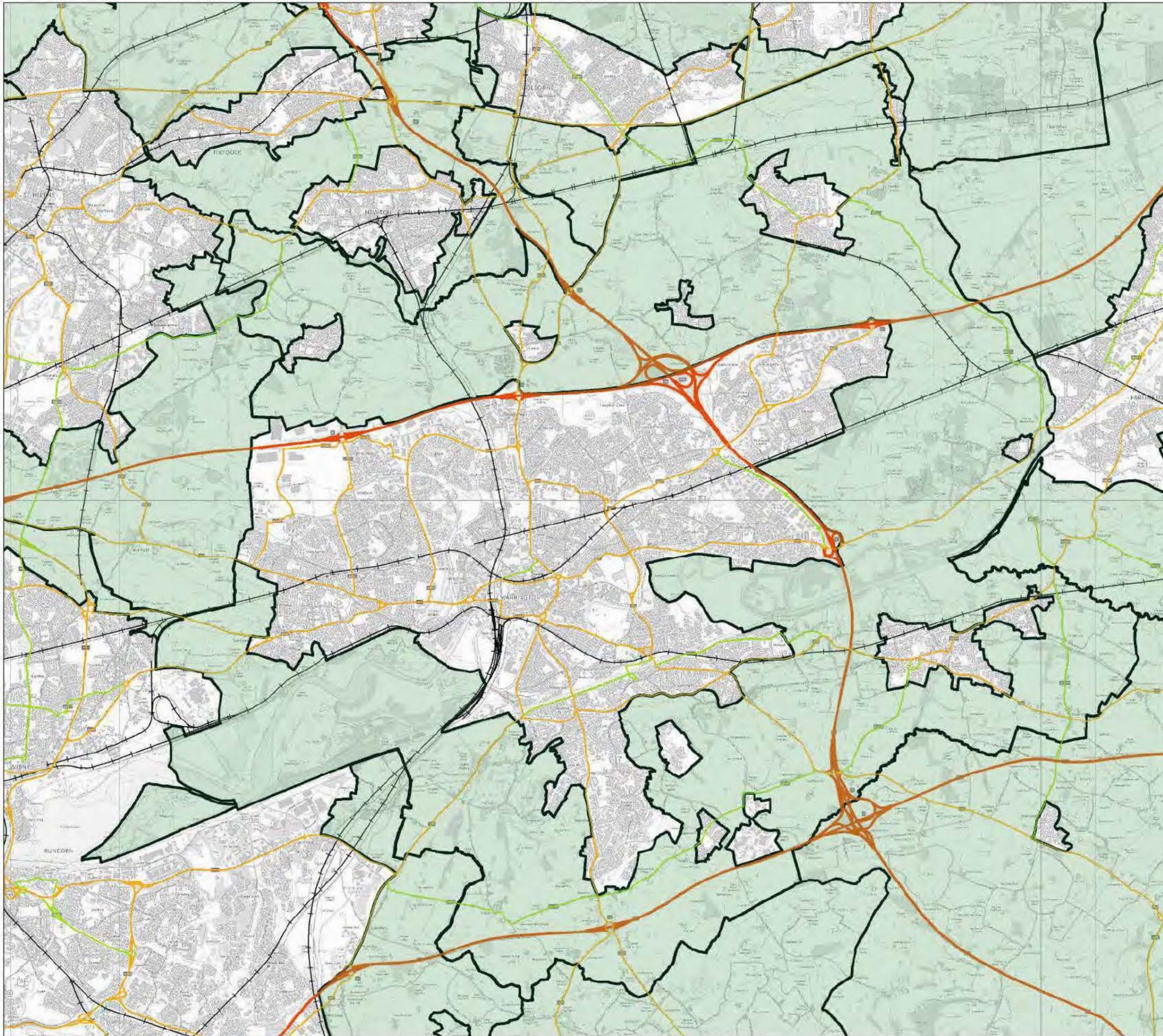
Green Belt Purpose	ARUP Rating	ARUP Comments	Pegasus Rating	Pegasus Comments
1. To check the unrestricted sprawl of large built up area	NC	The GA is not adjacent to the urban area and therefore does not contribute to this purpose.	WC	Disagree - Although we agree that this GA is detached from the main urban area of Warrington, it cannot be ignored that the development of this parcel would cause the sprawl of the large built up area of St Helens (the neighbouring authority). Some consideration must be given to this although we understand that this is not the exact purpose of this GB assessment.
2. To prevent neighbouring town merging into one another	SC	The GA forms an essential gap between St. Helens and Newton-le-Willows in the adjacent neighbouring authority of St. Helens, whereby a reduction in the gap would result in the actual merging of these settlements. Overall the GA makes a strong contribution to preventing towns from merging.	SC	Agree - We have significant concerns with the development of this GA and the merging/coalescence of settlements that will occur as a result of the development of this GA. The development of this GA would merge St Helens, Newton-le-Willows and Collins Green and therefore makes a significant contribution to this purpose.
3. To assist in safeguarding the countryside from encroachment	MC	The western boundary between the GA and St. Helens follows an administrative boundary which is not durable and would not prevent encroachment. The Liverpool to Manchester railway and the St. Helens Canal form durable boundaries between the GA and the countryside which could prevent encroachment beyond the GA if the GA was developed. The existing land use predominantly consists of open countryside with the washed over village of Collins Green lying in the south of the GA and a small number of residential properties in the west of the GA which are a continuation of the adjacent settlement of St. Helens. The GA supports a strong degree of openness given it has less than 10% built form and low levels of vegetation. The GA is connected to the open countryside along the northern and southern boundaries thus given its connection to St Helens it therefore make a moderate contribution. Overall the GA makes a moderate contribution to safeguarding from encroachment.	SC	Disagree - The western boundary of this GA is a non-durable boundary and therefore there is a concern that should this GA be brought forward for development, it would cause encroachment into the open countryside. To the west in particular is Colliers Moss Common which provides significant opportunities for residents to access and enjoy the open countryside. A very small section of Colliers Moss Common is located within this parcel and footpaths from within this GA link to the wider recreational area. The development of this GA would have a significant impact on this recreational area as well as developing a small section of this area. There are open long line views and a strong degree of openness and therefore we consider this GA to have a strong contribution to this purpose as opposed to a moderate contribution.
4. To preserve the setting and special character of historic towns	NC	The GA is not adjacent to a historic town and does not cross an important viewpoint of the Parish Church.	NC	Agree - The General Area makes no contribution to this purpose given that it is not located adjacent to any conservation area or crosses any important viewpoints of the Parish Church.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	MC	The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	MC	Agree - All parcels in Warrington have been allocated the same scoring in this regard. As this data is taken from the Mid Mersey Housing Market Area, which covers a rather large area, we feel an assessment should be carried out on an individual local authority level to account for individual settlements.

<p><u>Justification for assessment and Overall Assessment</u></p>	<p>MC</p>	<p>The GA makes a strong contribution to one purpose, a moderate contribution to two and no contribution to two. Professional judgement has therefore been applied and the GA has been judged to make a moderate overall contribution to the Green Belt. The GA contains a mix of durable and non-durable boundaries which could prevent some encroachment into the countryside. While the GA is not adjacent to the urban area and therefore does not contribute to checking unrestricted sprawl, it supports a strong degree of openness and development would lead to the merging of St. Helens and Newtonle-Willows. The GA does not help to preserve any historic towns.</p>	<p>SC</p>	<p>Disagree - Using our professional judgement, we consider this GA to overall have a strong contribution to Green Belt purposes. This parcel is significant in preventing the merging of settlements and therefore we think that this should be reflected in the overall contribution of the Green Belt purposes. The parcel is also well connected to the countryside, particularly along the western boundary. A small section of Colliers Moss Wood is located within the parcel and therefore this GA is accessible to recreational spaces. The development of this GA would have a significant impact on this recreational area and given that this boundary is not particularly strong or permanent, we consider the parcel to overall have a strong contribution.</p>
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<p>Key - No Contribution (NC)</p>	<p>Weak Contribution - WC</p>	<p>Moderate Contribution - MC</p>	<p>Strong Contribution - SC</p>
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APPENDIX 2 – GREEN BELT BOUNDARY MAP OF WARRINGTON



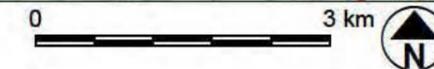
- KEY**
- Green Belt
  - Road Type**
  - A Road
  - B Road
  - Motorway
  - Railways

Revisions:  
First Issue - 24/05/2019 EH

**Greenbelt**

**P16-1405 - Grappenhall, Warrington**

Client: Taylor Wimpey Developments Ltd  
 DRWG No: P16-1405\_06 Sheet No: - REV:-  
 Drawn by: EH Approved by: ST  
 Date: 30/04/2019  
 Scale: 1:72,000 @ A3



## APPENDIX 3 – ANALYSIS OF ECONOMIC EVIDENCE

## Economic Note on Housing Need Figures in Local Plan

### Jobs Growth & Housing Need in Warrington – Summary of Published Evidence

- 1.1 When considering the extent to which the proposed target of 945 dwellings per annum (dpa) provides a realistic level of new housing provision in Warrington, it is helpful to review where this figure comes from and how it compares with other estimates. As noted in the Proposed Submission Version of the Local Plan, the target has been established **through the Council's** 2019 Local Housing Needs Assessment (HNA), which was undertaken by GL Hearn.
- 1.2 The proposed housing target of 945 dpa is based on jobs growth of 954 p.a. This employment increase is based on adjustments made by GL Hearn to the original jobs growth estimate resulting from the Strategic Economic Plan (SEP) of the Cheshire & Warrington Local Enterprise Partnership. The growth identified by the SEP was originally estimated to generate 1,240 additional jobs p.a. and this figure is referenced in the May 2017 Strategic Housing Market Assessment (SHMA)<sup>1</sup>. However, the HNA has revised this figure downwards in light of more recent baseline forecasts by Oxford Economics. These are not as optimistic as previous estimates, which results in the lower jobs growth of 954 p.a. The higher figure of 1,240 jobs p.a. leads to an annual housing requirement of 1,113 dwellings according to the SHMA.
- 1.3 For comparison purposes, the HNA also projects future jobs growth in Warrington based on past trends. The Oxford Economics forecasts take into account past trends, however they also reflect the views of forecasters on what may happen in the future. To calculate jobs change purely on past trends, the HNA extrapolates growth based on the last full business cycle, noting that it is often characterised as a peak to peak period (P2P – before a crash) or trough to trough (T2T – after a crash). It states that such periods were seen in Warrington over 1997-2008 and 1998-2010 respectively. Annual jobs change is calculated for 2017-37 based on this method. For the P2P period, it is estimated that Warrington would see 2,175 jobs created p.a. between 2017 and 2037. For the T2T period, annual jobs growth is lower at 1,466. This is still considerably higher than the jobs growth of 954 p.a. outlined in the paragraph above, however. It is therefore worth exploring past employment change in Warrington in further detail. This is possible by drawing on data published by the Office for National Statistics (ONS).

### Employment Trends in Warrington – Review of ONS Data

- 1.4 ONS data allow for long-term analysis of past trends in employment going back to 1998. As a result of changes to the methodology used in producing the data, it is not possible to look

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<sup>1</sup> Mid Mersey SHMA Update – Warrington Addendum. GL Hearn, May 2017.

at trends over a continuous period. The following timeframes have been analysed to account for this fact:

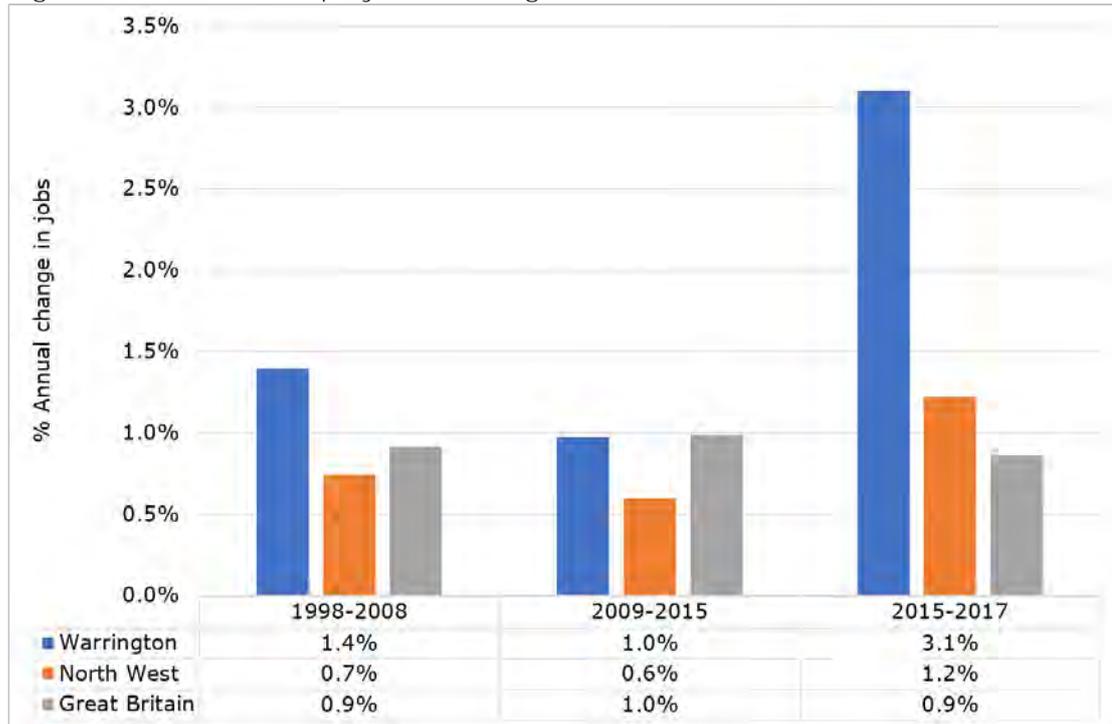
- 1998-2008: Jobs data published as part of the Annual Business Inquiry (ABI).
- 2009-2015: Jobs data published as part of the Business Register & Employment Survey (BRES).
- 2015-2017: Jobs data published by ONS as part of the BRES.

1.5 Analysis of the ONS data highlights the strong performance of the Warrington labour market, relative to national and regional benchmarks:

- 1998-2008: Warrington experienced jobs growth of 1.4% per annum over this period, with 15,000 jobs created between 1998 and 2008. The annual growth rate was significantly higher than the increases seen in the North West (0.7% p.a.) and Great Britain (0.9% p.a.). In absolute terms, annual jobs growth in Warrington between 1998 and 2008 was 1,500.
- 2009-2015: Growth in this period was lower at 1.0% p.a. in Warrington (7,000 more jobs in total), which may reflect the impact the economic downturn in 2008/09 had on the economy. However, the District still saw employment grow in line with Great Britain, and it was well above the regional increase of 0.6% p.a. In absolute terms, annual jobs growth in Warrington between 2009 and 2015 was 1,167.
- 2015-2017: Employment growth in Warrington over the most recent timeframe was particularly strong, with jobs increasing by 3.4% p.a. This equates to 12,000 more jobs between 2015 and 2017 and the annual growth rate was substantially above the corresponding rises for the North West and Great Britain of 1.2% and 0.9% respectively. In absolute terms, annual jobs growth in Warrington between 2015 and 2017 was 6,000.

1.6 Figure 1 presents the annual jobs change data discussed above, showing the percentage annual employment change in Warrington, the North West and Great Britain from 1998-2017.

Figure 1: % Annual Employment Change, 1998-2017



Source: Office for National Statistics

- 1.7 It is clear from the analysis presented above that **Warrington’s labour market has performed well** over the last 20 years. Even over the period 2009-15, which was badly impacted by the country emerging from the economic downturn, job numbers still grew by an average of almost 1,200 per annum. The HNA questions how realistic it is to extrapolate growth, **however the strength of Warrington’s past performance raises the question of whether the 954 jobs p.a. growth used to calculate the housing target of 945 dpa is ambitious enough.**
- 1.8 Warrington is part of one of the strongest performing areas of the economy – the Cheshire & Warrington LEP. The LEP is currently in the process of developing its Local Industrial Strategy (LIS) and part of the evidence base for the LIS outlines the aim of seeing the area become a £50billion economy by 2040. The LIS evidence base also highlights the strong performance of the LEP since 1998 in terms of growth in economic output. It seems reasonable to assume that this growth will need to continue if the area is to become a £50billion economy, which will require significant levels of employment to be created in the **LPE’s three constituent districts: Cheshire East; Cheshire West & Chester; and Warrington.** Having a housing target based on future jobs growth which is well below increases seen over the last 20 years therefore seems relatively unambitious.
- 1.9 As an absolute minimum, it would make more sense to use the annual jobs growth figure of 1,240 outlined in the 2017 SHMA as a starting point for calculating future housing need in Warrington.

APPENDIX 4 – WARRINGTON TOWN CENTRE & WATERFRONT CAPACITY ASSESSMENT

Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018							PEGASUS ASSESSMENT BASED ON										PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY ON AVAILABILITY / DELIVERABILITY				
	Parcel Area	% of Site for Residential as Assumed by Council	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)	
Stadium Quarter																															
A1	0.31	100%	0.31	0.28	0	20	4	0	24	-	-	-	0	0	0	0	0	0	No	Two vacant warehouse buildings.	1		We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4). However, there is no delivery mechanism to bring forward these parcels, they have not been put forward as part of the SHLAA process and no applications have been submitted for residential use. That said, we note these parcels are vacant and each appear to be in single ownership so there is a reasonable prospect that they could be redeveloped during the plan period but they are not considered 'deliverable' yet and have been included in the 'developable' 6-10 years supply. Noting the lack of promotion through the SHLAA we have applied a delivery ratio of 75% as it cannot be guaranteed at this stage that they are available for residential development.	0	20	2	0	22	75%	17	
A2	0.71	100%	0.71	0.64	0	35	20	0	55	-	-	-	0	0	0	0	0	No	1			0		35	18	0	53	75%	40		
A3	0.51	100%	0.51	0.46	0	0	19	0	19	-	-	-	0	0	0	0	0	No	1			0		0	19	0	19	75%	14		
A4	0.45	100%	0.45	0.41	0	0	17	0	17	-	-	-	0	0	0	0	0	No	1			0		0	17	0	17	75%	13		
A5	0.72	100%	0.72	0.65	0	0	27	0	27	-	-	-	0	0	0	0	0	No	1			0		0	27	0	27	75%	20		
A6	0.8	100%	0.80	0.72	0	20	24	0	44	-	-	-	0	0	0	0	0	Yes	Occupied office building and vehicle rental business.	3		There is no planning history for residential use so the parcels are not considered 'deliverable'. These parcels are also not considered 'developable' within the plan period as there is no delivery mechanism to bring them forward, they are currently in active use and there are multiple land titles.	0	0	0	0	0	0%	0		
A7	1.17	100%	1.17	1.05	0	35	74	0	109	-	-	-	0	0	0	0	0	Yes		4			0	0	0	0	0	0%	0		
A20	1.93	82%	1.59	1.43	0	165	35	0	200	1401	Yes	Yes	20	0	20	0	0	20	Yes	Offices, car park, pub, convenience store, car wash	13	2013/22881 - Full application for business start-up "incubator" units (Use Class B1(a) and (b)) with associated access, parking, landscaping and infrastructure. 2017/31295 - Discharge of conditions for the above.	There is no planning history for residential use so the parcels are not considered 'deliverable'. Moreover there is a recently implemented consent for new office 'incubator' units on part of the site. Since part of this parcel is included in the SHLAA, we have retained this element in the 'developable' supply but even the SHLAA only assumes 20 units. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4). The Council's masterplan assumes 82% of this site will come forward for housing at 140 dph. We consider this to be unrealistic given the 13 titles and lack of SHLAA submissions. We therefore reduce this by 50%	0	165	21	0	186	50%	93	
A21/22	1.02	100%	Figures not calculated due to extant permission		362	0	0	0	362	1029	No	Yes	362	134	228	0	0	362	Yes					Largely vacant site although there is also a kebab shop, car park, furniture shop, fish and chip shop, appliances store.	10	2017/31394 - Full planning application for 362 C3 apartments approved 30/07/2018. 2018/34128 - Discharge of conditions 3, 5, 6,10, 13, 16, 17 partly discharged 03/04/19.	There is full consent for 362 dwellings which is considered 'deliverable'.	362	0	0	0
A24	1.13	50%	0.57	0.51	110	30	0	0	140	2480	No	No	38	0	0	38	0	38	Yes	Largely vacant site although there are some businesses operating including Enterprise Rent a Car.	8	2017/31120 - application for Car Rental Garage. Approved with condition 14/07/2017. 2018/33441 - application for an advertisement sign for Enterprise Rent a Car	There is no planning history for residential use so the parcels are not considered 'deliverable'. The site is being promoted through the SHLAA which has identified a capacity of 38 dwellings during 11-15 years. Since this parcel is included in the SHLAA we have retained this element in the 'developable' supply but note that this is only a small proportion of what the Council assume through the masterplan approach. Due to the number of ownerships and existing businesses on the site, we apply a ratio of 50%	0	110	30	0	140	50%	70	

Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018							PEGASUS ASSESSMENT BASED ON						PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY ON AVAILABILITY / DELIVERABILITY															
	Parcel Area	% of Site for Residential as Assumed by Council	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)								
A25	0.31	50%	0.16	0.14	38	0	0	0	38	2681	Yes	No	38	0	38	0	0	38	Yes	Small warehousing/office space (electr city serv ces etc)	6		There is no planning history for residential use so this parcel is not considered 'deliverable'. This parcel is included in the SHLAA 2018 which has identified a capacity of 38 dwellings during 6-10 years although it is not being promoted by the landowners and there is no developer interest. Nevertheless, we have therefore included this in the 'developable' supply.	0	38	0	0	38	75%	29								
A26	0.28	50%	0.14	0.13	35	0	0	0	35	-	-	-	0	0	0	0	0	0	No	Vacant	6	2011/18856 - listed building application approved with cons 21/10/2011 related to application 2011/18854 for a change of use from office B1 to health surgery D1	There is no planning history for residential use so the parcels are not considered 'deliverable'. It appears to be in 6 ownerships but we note the land is largely vacant and therefore could be 'developable' within the 6-10 years supply. However, there is no delivery mechanism to bring forward this parcel.	0	35	0	0	35	50%	18								
A27	0.19	50%	0.10	0.09	0	24	0	0	24	2471	Yes	No	74	0	0	74	0	74	Yes	Car park associated with adjacent retail park	2	2017/31441 - Discharge of Condition 5, 11, 13 08/12/2017 on approved land on 2016/29311 for a single storey building for A1 and/or A3 with parking and landscaping.	There is no planning history for residential use so this parcel is not considered 'deliverable'. Moreover, there is a recent consent for A1 and / or A3. Whilst this parcel is included in the SHLAA with expected delivery during 11-15 years although, it is not being promoted by the landowners and there is no known developer interest. Given the site is occupied by commercial tenants, we have assumed zero development on this site during the plan period.	0	0	24	0	24	0%	0								
A28	1.69	10%	0.17	0.15	0	42	0	0	42										Yes	Retail park containing Sofology, Carpet Right, Wickes and a children's play centre	2											0	0	42	0	42	0%	0
A30	0.61	75%	0.46	0.41	0	0	0	0	0	2682	Yes	No	80	0	0	80	0	80	Yes	Warehouse, Johnsons Dry Cleaning Services and a small car parking area	3		There is no planning history for residential use so these parcels are not considered 'deliverable'. These parcels are included in the SHLAA which has identified a capacity of 80 dwellings during 11-15 years although it is not being promoted by the landowners and there is no developer interest. Given the active uses on the site, we do not consider the site to be available or developable and have assumed zero development on these parcels	0	0	0	0	0	0%	0								
A31	0.41	100%	0.41	0.37	0	0	18	0	18										Yes	Car Sales Garage and Forecourt	1											0	0	0	18	18	0%	0
A32	0.34	100%	0.34	0.31	0	0	0	0	0										Yes	Car Sales Garage and Forecourt	1											0	0	0	0	0	0%	0
<b>Total</b>					<b>545</b>	<b>371</b>	<b>238</b>	<b>0</b>	<b>1154</b>				<b>612</b>	<b>134</b>	<b>286</b>	<b>192</b>	<b>0</b>	<b>612</b>						<b>362</b>	<b>403</b>	<b>200</b>	<b>18</b>	<b>983</b>		<b>675</b>								
Bridge Street Quarter																																						
B2	1.65	30%	0.50	0.45	62	0	0	0	62	-	-	-	0	0	0	0	0	0	Yes	There are a number of commercial/retail units, including: HSBC, McColls, Burger King, Hancock and Wood, Skipton Building Society, Crawshaws, Sweet Shop, Halifax,	16	There a multitude of planning applications across this area within the town centre particularly across Parcels B2 and B5. The most transformational relates to application ref: 2014/24473 for a mixed use commercial	We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4) on the assumption that some residential development was delivered. However, we have not been able to find specific permissions for residential permissions within this parcel and notably the SHLAA makes no reference to such permissions. Due to much of the area being under development within Parcels B2 and B5 for commercial use we have applied a 0% development ratio until such time that the Council might provide counter evidence on any relevant permissions. Parcels B7 and B8 are still in active commercial use but due to the limited ownerships we have assumed 50% development ratio until such time that further evidence is provided by the Council.	0	0	58	0	58	0%	0								
B5	0.84	50%	0.42	0.38	53	0	0	0	53	-	-	-	0	0	0	0	0	0	Yes	Derelict Building, Sports and Music Bar, Bridges Pub, Fast food Takeaways	15	development including new retail space, offices and a new market area by Muse. It was approved December 2014 and various conditions discharged.			0	0	49	0	49	0%	0							
B7	0.61	50%	0.31	0.27	0	38	0	0	38	-	-	-	0	0	0	0	0	0	Yes	DW Fitness Gym and Associated Car Park	1	Redevelopment has commenced and it is anticipated to open in 2020.			0	0	35	0	35	50%	18							
B8	0.39	50%	0.20	0.18	0	25	0	0	25	-	-	-	0	0	0	0	0	0	Yes	Job Centres and Employment Agencies	4					0	0	23	0	23	50%	12						
<b>Total</b>					<b>115</b>	<b>63</b>	<b>0</b>	<b>0</b>	<b>178</b>				<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>						<b>0</b>	<b>0</b>	<b>165</b>	<b>0</b>	<b>165</b>		<b>29</b>								

Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018							PEGASUS ASSESSMENT BASED ON										PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY ON AVAILABILITY / DELIVERABILITY				
	Parcel Area	% of Site for Residential as Assumed by Council	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)	
Wharf Street Quarter																															
L1	0.57	25%	0.14	0.13	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	DFS and associated car park	3		There is no planning history for residential use so this parcel is not considered 'deliverable'. We agree that it is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward, the site is in active commercial use and has not been promoted through the SHLAA.	0	0	0	0	0	0%	0	
Total					0	0	0	0	0				0	0	0	0	0						0	0	0	0	0				
Cockhedge Quarter																															
C1	0.81	80%	0.65	0.58	0	55	105	0	160	-	-	-	0	0	0	0	0	0	No	This is a series of vacant and redundant Victorian and later buildings, some of which are being marketed and some of which are in active commercial use.	11	2019/34532 - Full planning application for conversion of existing vacant coach house to a 15 bedroom Sui Generis HMO with communal facilities. Application registered 01/03/19. 2017/31520 - Advertisement sign for Cockhedge Shopping Centre.	There is no planning history for residential C3 use so the parcel is not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward, and there are multiple titles across the parcel. The Council assume 80% of the gross area of the parcel could be redeveloped for residential development delivering 160 units at a density of 275 dph. Whilst we note this location near the station could accommodate high density development, thus loss of the existing buildings (some of which have good character) has not been scrutinised and we consider conversion/change of use and extensions to the existing buildings are likely to prove more viable noting recent permissions. We therefore apply a lower density of 130 dph albeit with a deliverability ratio of just 50% given the extent of ownerships and existing active uses whilst noting some units are vacant and on the market.	0	25	50	0	75	50%	38	
C2	0.43	80%	0.34	0.31	0	35	50	0	85	-	-	-	0	0	0	0	0	0	Yes	Buzz Bingo, Wilkinsons Store, Asda, B&M	1		There is no planning history for residential use so these parcels are not considered 'deliverable'. Whilst each parcel is within individual ownerships, they are not considered 'developable' within the plan period as there is no delivery mechanism to bring them forward, each is in active commercial use and there is no indication that leases are due to expire. Furthermore, none of the parcels have been put forward in the SHLAA. It is not considered that there is a reasonable prospect they will be available and could be viably developed.	0	0	0	0	0	0%	0	
C4	0.27	50%	0.14	0.12	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1			0	0	0	0	0	0	0%	0
C5	0.24	50%	0.12	0.11	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1			0	0	0	0	0	0	0%	0
C6	0.31	50%	0.16	0.14	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1			0	0	0	0	0	0	0%	0
C7	0.25	80%	0.20	0.18	0	35	15	0	50	-	-	-	0	0	0	0	0	0	Yes	These parcels are occupied by Changing Lives in Warrington furniture store.	1			0	0	0	0	0	0%	0	
C8	0.43	80%	0.34	0.31	0	35	50	0	85	-	-	-	0	0	0	0	0	0	Yes		1			0	0	0	0	0	0%	0	
C9	0.6	50%	0.30	0.27	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	These parcels comprise of the Cockhedge Shopping Centre and separate units including Argos, Xercise4Less etc.	1			0	0	0	0	0	0%	0	
C10	0.45	50%	0.23	0.20	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1			0	0	0	0	0	0%	0	
C11	0.31	50%	0.16	0.14	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1			0	0	0	0	0	0%	0	
C12	0.29	50%	0.15	0.13	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1			0	0	0	0	0	0%	0	
C13	0.08	50%	0.04	0.04	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1			0	0	0	0	0	0%	0	
C14	0.17	50%	0.09	0.08	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	1			0	0	0	0	0	0%	0		
Total					0	160	220	0	380				0	0	0	0	0						0	25	50	0	75		38		

Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018							PEGASUS ASSESSMENT BASED ON						PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY ON AVAILABILITY / DELIVERABILITY								
	Parcel Area	% of Site for Residential as Assumed by Council	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)	
St Mary's Quarter																															
D1	0.41	80%	0.33	0.30	70	11	0	0	81	2673	Yes	No	203	0	127	76	0	203	Yes	New Town House. Large 1960's office block. Council offices.	3	We understand there has been an application made for prior approval to demolish the buildings but no applications for residential development.	The Council have applied a very high density at 275 dph but we agree there is scope to accommodate a high density on this site due to the scale of the existing buildings. There is no planning history for residential use so these parcels are not considered 'deliverable' within 0.5 years. That said, the limited ownerships and Council control suggests there might be some prospect of delivery during the Local Plan. We note that the Council are intending to relocate to Times Square but there is no direct evidence of this submitted as part of the Local Plan.	0	70	11	0	81	75%	61	
D2	0.48	80%	0.38	0.35	0	95	0	0	95										Yes	Car park and small office	9		Whilst there are various titles across this we believe the majority of the land is controlled by the Council and would become available following the relocation of the Council. We have applied the same assumptions as per Parcel D1.	0	95	0	0	95	75%	71	
D3	0.75	20%	0.15	0.14	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Various office buildings within a series of Georgian buildings	1		There is no planning history for residential use so this parcel is not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward and it is in active use and the historic nature of the buildings could prevent conversion.	0	0	0	0	0	0%	0	
D4	0.34	75%	0.26	0.23	0	63	0	0	63	2474	Yes	No	49	0	0	49	0	49	Yes	Pure gym in a modern commercial unit.	1		There is no planning history for residential use so this parcel is not considered 'deliverable'. That said, the single ownership and single active use could present an opportunity for redevelopment and there is a reasonable prospect it will be available and could be viably developed. This parcel is also included in the SHLAA which has identified a capacity of 49 dwellings during 11-15 years although it is not being promoted by the landowners and there is no developer interest. We have applied a 25% delivery ratio on the basis that the site is in the SHLAA but it is in active commercial use with no obvious signs of that use ending within the plan period.	0	0	63	0	63	25%	16	
D5	0.96	80%	0.77	0.69	144	0	0	0	144	1746	Yes	Yes	144	144	0	0	0	144	Yes	Disused Supermarket, car park and a small block of retail units.	13	2017/31148 - Proposed demolition of former Kwik save supermarket and construction of new residential apartment blocks, 144 dwellings, retail and commercial units. 2019/34517 - Discharge of conditions in relation to this application 05/04/19.	There is full residential consent for 144 dwellings by Lane End Developments which is considered 'deliverable'.	144	0	0	0	144	100%	144	
D6	1.04	20%	0.21	0.19	0	26	0	0	26	-	-	-	0	0	0	0	0	0	Yes	Pub and Office Buildings with historical character, historic church building, parade of small shops in active use and existing residential homes/block.	20		There is no planning history for residential use so these parcels are not considered 'deliverable'. The site has not been put forward in the SHLAA and there are multiple land titles associated with the parcel. That said, we note the Council have only assumed 20% of the parcel would be delivered for new homes which could just relate to one or two titles. We note some of the buildings lend themselves to conversion. However, we have applied a 50% delivery ratio due the building being in active use and there could be conservation issues.	0	26	0	0	26	50%	13	
Total					214	195	0	0	409				396	144	127	125	0	396						144	191	74	0	409		305	

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	Parcel Area	% of Site for Residential as Assumed by Council	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)
St Elphins Quarter																														
E1	0.43	50%	0.22	0.19	0	27	0	0	27	2477	Yes	No	33	0	0	33	0	33	Yes	Office space and disused buildings.	8		There is no planning history for residential use so the parcels are not considered 'deliverable' but they have been included in the 'developable' 6-10 years supply. There is no delivery mechanism to bring forward this parcel. That said, some of the buildings appear vacant and whilst in multiple ownerships there could be some prospect of redevelopment/re-use. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4) and applied a 50% delivery risk ratio.	0	0	27	0	27	50%	14
E2	0.39	75%	0.29	0.26	0	0	0	0	0	2481	Yes	No	42	0	42	0	0	42	Yes	Dreams, Farm foods and Office Outlet	3		There is no planning history for residential use so this parcel is not considered 'deliverable'. This parcel is included in the SHLAA 2018 which has identified a capacity of 42 dwellings during 11-15 years although it is not being promoted by the landowners and there is no developer interest. We also note that there are 3 registered titles relating to the land suggesting multiple ownership issues. The Council have not assumed it would come forward and we have no evidence to suggest it would.	0	0	0	0	0	0%	0
E3	0.27	90%	0.24	0.22	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Car Park	1			0	0	0	0	0	0%	0
E4	0.15	100%	0.15	0.14	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Open space	4			0	0	0	0	0	0%	0
E5	0.15	100%	0.15	0.14	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Sainsburys store	2			0	0	0	0	0	0%	0
E6	0.33	100%	0.33	0.30	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes					0	0	0	0	0	0%	0
E7	0.47	100%	0.47	0.42	0	0	0	0	0	-	-	-	0	0	0	0	0	0	No	Vacant office (?)	1			0	0	0	0	0	0%	0
E8	0.5	100%	0.50	0.45	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Sainsburys store	2			0	0	0	0	0	0%	0
E9	0.3	80%	0.24	0.22	0	20	10	0	30	-	-	-	0	0	0	0	0	0	Yes	Lidl and car park	1	2018/33032 - Advertisement application for Lidl approved 08/08/2018	There is no planning history for residential use so this parcel is not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward, it is in active use and there is no indication that the lease is due to expire. It is not considered that there is a reasonable prospect it will be available and could be viably developed.	0	20	10	0	30	0%	0
E10	0.28	100%	0.28	0.25	0	0	20	0	20	-	-	-	0	0	0	0	0	0	No	Derelict buildings	7		There is no planning history for residential use so the parcels are not considered 'deliverable' but they have been included in the 'developable' 6-10 years supply. There is no delivery mechanism to bring forward this parcel. That said, it appears vacant and whilst in multiple ownerships there could be a reasonable prospect of it being developed. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4) and applied a 50% delivery risk ratio.	0	18	0	0	18	50%	9
E11	0.31	70%	0.22	0.20	0	0	13	0	13	2478	Yes	No	44	0	0	44	0	44	Yes	Yard filled waste	7		There is no planning history for residential use so this parcel is not considered 'deliverable'. This parcel is included in the SHLAA 2018 which has identified a capacity of 44 dwellings during 11-15 years although it is not being promoted by the landowners and there is no developer interest. We also note that there are 7 registered titles relating to the land suggesting multiple ownership issues. As such, we have applied a delivery risk ratio of 25%.	0	0	13	0	13	25%	3

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	Parcel Area	% of Site for Residential as Assumed by Council	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)			
E12	0.62	20%	0.12	0.11	0	16	0	0	16	-	-	-	0	0	0	0	0	0	Yes	Shop, MOT garage, Car Wash, Existing Houses, Small Car Park.	18		There is no planning history for residential use so this parcel is not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward, it is in active use and there is no indication that the lease is due to expire and the site was not promoted in the SHLAA. Coupled with multiple ownerships and various uses, there is no evidence to suggest this site is developable within the plan period. However, we also note that the Council only assume 20% of the site would be redevelopment. As such, we've allowed a 50% delivery risk ratio on the basis that one of the ownerships might come forward.	0	0	16	0	16	50%	8			
E13	0.38	90%	0.34	0.31	0	15	0	0	15	-	-	-	0	0	0	0	0	0	Yes	Retirement home and small industrial/retail unit.	3		There is no planning history for residential use so this parcel is not considered 'deliverable'. It is also not considered 'developable' within the plan period and is in active use. It is not considered that there is a reasonable prospect it will be available and could be viably developed. However, we note the Council only assume 50% of the site would be redeveloped which could relate to the industrial unit near the care home. We apply a 50% delivery risk ratio on the basis that the site was not promoted through the SHLAA.	0	15	0	0	15	50%	8			
E14	0.46	50%	0.23	0.21	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Sainsburys store	1		There is no planning history for residential use so these parcels are not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward, it is in active use and the occupiers have made representations during the previous consultation process that the masterplan fails to take account of this existing uses.	0	0	0	0	0	0%	0			
E15	0.44	75%	0.33	0.30	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1			0	0	0	0	0	0%	0			
E16	0.3	100%	0.30	0.27	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1			0	0	0	0	0	0%	0			
<b>Total</b>					<b>0</b>	<b>78</b>	<b>43</b>	<b>0</b>	<b>121</b>				<b>119</b>	<b>0</b>	<b>42</b>	<b>77</b>	<b>0</b>	<b>119</b>						<b>0</b>	<b>53</b>	<b>66</b>	<b>0</b>	<b>119</b>		<b>41</b>			
<b>Thornycroft</b>																																	
F2	0.31	50%	0.16	0.14	7	0	0	0	7	1710	Yes	No	65	0	65	0	0	65	Yes	Waste transfer station (B2)	2		There is no planning history for residential use so these parcels are not considered 'deliverable'. This parcel is included in the SHLAA 2018 which has identified a capacity of 65 dwellings during 11-15 years although it is not being promoted by the landowners and there is no developer interest. We also note that there are 7 registered titles relating to the land suggesting multiple ownership issues. Only one parcel is not in active use but there is a recent consent on this parcel for open car storage. As such, we have applied a delivery risk ratio of 25%.	0	7	0	0	7	25%	2			
F3	0.23	50%	0.12	0.10	14	0	0	0	14										No	Unoccupied space within the Waste Transfer Station's yard	1	2019/34646 - change of use of land from B1 (light industrial) to open a car storage for 150 cars (Use Class B8) for temporary period of 2 years. Granted permission on 18/04/19.		0	13	0	0	13	25%	3			
F4	0.36	50%	0.18	0.16	23	0	0	0	23										Yes	Waste transfer station (B2)	3			0	21	0	0	21	25%	5			
F5	0.15	50%	0.08	0.07	3	0	0	0	3										No	Green space adjacent Waste Transfer Station	1			0	3	0	0	3	25%	1			
<b>Total</b>					<b>47</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>47</b>													<b>65</b>		<b>0</b>	<b>65</b>	<b>0</b>	<b>0</b>	<b>65</b>					<b>0</b>

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	Parcel Area	% of Site for Residential as Assumed by Council	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)	
Cabinet Works																															
G1	0.78	80%	0.62	0.56	79	0	0	0	79	2472	No	Yes	15	0	15	0	0	15	No	Largely vacant.	18	2017/31128 - Full Planning and demolit on of an unlisted building in a conservat on area - Proposed replacement of damaged/collapsed Roofs and Chimney, dismantling of existing archway wall and stone, stored to be rebuilt and Change of use from B1 to A3 & A4	There is no planning history for residential use so this parcel is not considered 'deliverable'. This parcel is included in the SHLAA which has identified a capacity of 15 dwellings during 11-15 years. On this basis, and owing to the fact that it is largely vacant, there is a reasonable prospect that some residential development could come forward. However, the SHLAA capacity is much lower than that identified in the masterplan and as such we have applied a delivery risk ratio of 75%. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4).	0	73	0	0	73	75%	55	
G2	0.43	50%	0.22	0.19	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	A1, A2, A3 ground floor uses; including night club. C3, B1 above.	8		There is no planning history for residential use so this parcel is not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward, it is in active use and there are multiple landowners.	0	0	0	0	0	0%	0	
G3	0.47	50%	0.24	0.21	0	30	0	0	30	-	-	-	0	0	0	0	0	0	Yes	A1, A2, A3 ground floor uses, C3, B1 above.	18	2018/32057 - Pr or approval for change of use from B1 office to C3 residential use of 31 apartments on floors 1-3 with ground floor B1 office remaining. Approved 5/05/2018. 2019/34273 Demolition of existing Vicarage and constructing of 6 storey residential apartment block comprising 20 apartments to upper floors and commercial units to ground floor - undecided.	There is full consent for residential development so we have retained this element in the supply.	0	30	0	0	30	100%	30	
G4	1.38	20%	0.28	0.25	0	35	0	0	35	1755	No	Yes	25	0	25	0	0	25	Yes	NHS wellbeing centre, various A1, A2, B1, D2 uses.	1		There is no planning history for residential use so this parcel is not considered 'deliverable'. This parcel is included in the SHLAA which has identified a capacity of 25 dwellings during 6-10 years. On this basis there is a reasonable prospect it will be available and could be viably developed as it is also being promoted by the landowner. However the SHLAA capacity is lower than that identified in the masterplan and the site is currently in active use so on this basis we have applied a delivery risk ratio of 75%. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4).	0	33	0	0	33	75%	25	
Total					79	65	0	0	144				40	0	40	0	0	40						0	136	0	0	136		110	

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	Parcel Area	% of Site for Residential as Assumed by Council	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)	
Bank Quay																															
H6	0.1	50%	0.05	0.05	0	6	0	0	6	-	-	-	0	0	0	0	0	0	Yes	CCP Car park	2	2013/21830 - Full planning app for demolition of existing buildings and development of a car park up to 35 dwellings approved 26/07/2013	There is no live consent for residential use so this parcel is not considered 'deliverable'. The site is not included in the SHLAA and is in active use however we note that the Council consider that only half of the parcel is developable for residential use. We have therefore applied a development risk ratio of 50%.	0	6	0	0	6	50%	3	
H7	0.04	100%	0.04	0.04	0	2	0	0	2	-	-	-	0	0	0	0	0	0	Yes	Car park	2		There is no live consent for residential use so this parcel is not considered 'deliverable'. We note that the Council consider that the whole parcel will come forward for residential development but it is not in the SHLAA and is in active use. However on the basis that the plan envisages that the Bank Quay area is to be regenerated and there may be an opportunity for small parcels to come forward for residential development as part of that, we have applied a development risk ratio of 50%.	0	2	0	0	2	50%	1	
H9(H8)	0.11	100%	0.11	0.10	0	5	0	0	5	-	-	-	0	0	0	0	0	0	Yes	Office building	2		There is no live consent for residential use so this parcel is not considered 'deliverable'. We note that the Council consider that the whole parcel will come forward for residential development but it is not in the SHLAA and is in active use. However on the basis that the plan envisages that the Bank Quay area is to be regenerated and there may be an opportunity for small parcels to come forward for residential development as part of that, we have applied a development risk ratio of 50%.	0	5	0	0	5	50%	3	
Total					0	13	0	0	13				0	0	0	0	0	0						0	13	0	0	13		7	

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	Parcel Area	% of Site for Residential as Assumed by Council	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)
Southern Gateway																														
I1	1.02	100%	1.02	0.92	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Homebase	1		There is no planning history for residential use so these parcels are not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring forward and it is in active use.	0	0	0	0	0	100%	0
I2	1.45	100%	1.45	1.31	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Loading bay large A1 uses	1			0	0	0	0	0	100%	0
I3	2.25	100%	2.25	2.03	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Car park, A3/5 establishments, drive-through McDonald's and Harvester	1			0	0	0	0	0	100%	0
I4	2.45	100%	2.45	2.21	0	35	42	0	77	2482	Yes	No	129	0	129	0	0	129	Yes	Large scale B2, B8 uses.	1	2019/34260 - Proposed demolition of existing industrial units and construction of 9 new independent industrial units. Undecided.	There is no residential consent so these parcels are not considered 'deliverable'. The parcels are included in the SHLAA which has identified a capacity of 129 dwellings during 6-10 years. However, whilst the site is in single ownership it does not appear to be being promoted by the landowner and is in active use, and there is recent consent for industrial use. On this basis we have applied a development risk ratio of 50%.	0	35	42	0	77	50%	39
I5	1.35	100%	1.35	1.22	0	35	17	0	52										Yes	B2, B8, D2 uses, brewing company, repairs, flooring	1			0	35	17	0	52	50%	26
I8	1.68	20%	0.34	0.30	5	0	0	0	5	1752/1753	Part yes, part no	Yes	163/38	0	0	38	0	38	Yes	Large carpark ancillary to industrial uses, brownfield- former RLFC ground	2		There is no planning history for residential use so these parcels are not considered 'deliverable'. The parcels are included in the SHLAA which has identified a capacity of 129 dwellings during 6-10 years and this is a brownfield site. On this basis there is a reasonable prospect it will be available and could be viably developed.	5	0	0	0	5	100%	5
I11	0.87	100%	0.87	0.78	160	0	0	0	160	1752	No	Yes	163	135	28	0	0	163	Yes	B8, B2 uses	1	2018/33771 - Outline application for 160 residential units. Undecided.	There is a live outline application which has yet to be decided and this site is not therefore considered 'deliverable'. It has however been included in the SHLAA and is considered 'developable' during years 5-10. It is in single ownership, is not in active use and is being promoted by the landowner.	0	160	0	0	160	100%	160
I12	1.15	100%	1.15	1.04	35	2	0	0	37	-	-	-	0	0	0	0	0	0	Yes	Half waste land, half B2, B8 uses	1		There is no planning history for residential use so these parcels are not considered 'deliverable'. They are also not considered 'developable' within the plan period as there is no delivery mechanism to bring them forward, they are in active use and there are multiple land titles. Furthermore, these sites have not been put forward within the SHLAA and we have therefore applied a development risk ratio of 0%.	0	0	0	0	0	0%	0
I13	1.11	100%	1.11	1.00	0	0	0	57	57	-	-	-	0	0	0	0	0	0	Yes	B8, B2 uses	1			0	0	0	0	0	0%	0
I14	1.98	100%	1.98	1.78	0	0	0	89	89	-	-	-	0	0	0	0	0	0	Yes	B8, B2 uses	17			0	0	0	0	0	0%	0
I15	1.14	100%	1.14	1.03	0	0	0	98	98	-	-	-	0	0	0	0	0	0	Yes	B2/B8 uses	9			0	0	0	0	0	0%	0
I16	1.06	100%	1.06	0.95	0	0	91	0	91	-	-	-	0	0	0	0	0	0	No	Greenfield	1		There is no planning history for residential use so this parcel is not considered 'deliverable'. However, it is a vacant greenfield site in single ownership, so whilst not included within the SHLAA, could be considered 'developable' although we have applied a development risk ratio of 75%. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4).	0	0	86	0	86	75%	65
I17	1.21	100%	1.21	1.09	0	20	18	0	38	-	-	-	0	0	0	0	0	0	Yes	B2/B8 uses	2		There is no planning history for residential use so these parcels are not considered 'deliverable'. They are also not considered 'developable' within the plan period as there is no delivery mechanism to bring them forward, they are in active use and there are multiple land titles. Furthermore, these sites have not been put forward within the SHLAA and we have therefore applied a development risk ratio of 0%.	0	0	0	0	0	0%	0
I18	1.12	100%	1.12	1.01	0	20	15	0	35	-	-	-	0	0	0	0	0	0	Yes	B8 uses	2			0	0	0	0	0	0%	0
I19	1.26	100%	1.26	1.13	0	20	20	0	40	-	-	-	0	0	0	0	0	0	Yes	B8 uses	2			0	0	0	0	0	0%	0
Total					200	132	203	244	779				330	135	157	38	0	330						5	230	145	0	380		294

Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018							PEGASUS ASSESSMENT BASED ON							PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY ON AVAILABILITY / DELIVERABILITY							
	Parcel Area	% of Site for Residential as Assumed by Council	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)	
Arpley Road																															
J1	1.1	90%	0.99	0.89	55	190	0	0	245	2672	Yes	No	300	0	82	218	0	300	Yes	CCP Car park, landscaped space	3	2017/30394 - Decision issued 07/06/2017. Request for an EIA Screening Opinion (including 126 apartments) 2017/31429 - retrospective planning application for the use of the former nightclub building footprint as a temporary car park and associated car park infrastructure permission granted 12/12/17	There is a screening option relating to 126 apartments although no residential consents on this site. This parcel has been included in the SHLAA which has identified a wider capacity of 300 dwellings during 6-15 years, although the site is not being promoted by the landowner, is in active use as a car park and has multiple land titles. We have therefore applied a development risk ratio of 50%.	0	55	190	0	245	50%	123	
J2	0.42	90%	0.38	0.34	0	94	0	0	94										Yes	B8/storage yard	1		There is no residential planning history for this site. These parcels have been included in the SHLAA which has identified a wider capacity of 300 dwellings during 6-15 years, although the site is not being promoted by the landowner and these parcels are currently in active use by commercial operations. We have therefore applied a development risk ratio of 25%. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4).	0	94	0	0	94	25%	24	
J3	0.81	100%	0.81	0.73	0	55	145	0	200										Yes	Tyre depo	1			0	55	145	0	200	25%	50	
J4	0.55	100%	0.55	0.50	0	0	0	136	136										Yes	Go Outdoors Car Park	1			0	0	0	136	136	25%	34	
J5	0.48	90%	0.43	0.39	0	0	0	107	107										Yes	Go Outdoors	1			0	0	0	107	107	25%	27	
Total					55	339	145	243	782				300	0	82	218	0	300					0	204	335	243	782		257		
CITY CENTRE TOTAL					###	###	849	487	4007				1862	413	799	650	0	1862					511	1299	1035	261	3106		1765		

Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018							PEGASUS ASSESSMENT BASED ON										PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY ON AVAILABILITY / DELIVERABILITY					
	Parcel Area	% of Site for Residential as Assumed by Council	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)		
Waterfront																																
K5a	4.31	100%	4.31	3.88	0	275	105	0	380	-	-	-	0	0	0	0	0	0	No	Low grade greenfield, previously used as a landing stage	2				0	275	105	0	380	100%	380	
K5b	7.19	100%	7.19	6.47	0	275	105	0	380	-	-	-	0	0	0	0	0	0	No	Low grade greenfield	2				0	275	105	0	380	100%	380	
K5c	2.25	100%	2.25	2.03	0	0	275	107	382	-	-	-	0	0	0	0	0	0	No	Low grade greenfield	2	2018/33236 - EIA screening opinion - proposed for construct on of 1628 residential units.			0	0	275	107	382	100%	382	
K7a	8.63	100%	Not calculated - taken from ASTU Site		0	275	200	0	475	1541	Yes	Yes	646	0	0	192	454	646	No	Unoccupied land	1	Given the planning history and inclusion of some parcels within the SHLAA there is a reasonable prospect that these parcels will be available and could be viably developed.			0	275	200	0	475	100%	475	
K7b	8.66	100%	Not calculated - taken from ASTU Site		0	275	0	0	275										No	Unoccupied land	1				0	275	0	0	275	100%	275	
K9a	4.32	100%	4.32	3.89	184	0	0	0	184	1715	No	Yes	510	82	275	153	0	510	Yes	Polyflex Packaging (B8)	1	2018/31890 - EIA scoping opinion for proposed development of around 510 dwellings. Scoping issued 24/01/2018.			184	0	0	0	184	100%	184	
K9b	4.81	100%	4.81	4.33	184	0	0	0	184										Yes	Polyflex Packaging (B8)	1				184	0	0	0	184	100%	184	
K10	4.38	100%	4.38	3.94	162	0	0	0	162										Yes	Driving range	1				162	0	0	0	162	100%	162	
K19	0.59	100%	0.59	0.53	27	0	0	0	27	-	-	-	0	0	0	0	0	0	Yes	Car parking and car yard	19			27	0	0	0	27	0%	0		
K20	0.78	100%	0.78	0.70	35	0	0	0	35	-	-	-	0	0	0	0	0	0	Yes	Jewson	1			35	0	0	0	35	0%	0		
K23	1.71	75%	1.28	1.15	0	0	58	0	58	-	-	-	0	0	0	0	0	0	Yes	Iceland supermarket, Jehovah's Witness Church	4	2018/32785 - application for a change of use from B1 office to D1 non-residential institutions providing midwifery advice and associated activities. Approved with conditions 24/07/18	There is no planning history for residential use so this parcel is not considered 'deliverable'. They are also in multiple ownerships, in active use by commercial operators and not included in the SHLAA. We have applied a 0% delivery ratio.			0	0	58	0	58	0%	0
K26	1.64	75%	1.23	1.11	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Largely undeveloped land with the exception of the car park. It is expected that the dwellings will be built around the existing uses	2			0	0	0	0	0	0	0%	0	
K27	0.92	75%	0.69	0.62	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	B2/B8, established ground engineering company	2		There is no planning history for residential use so this parcel is not considered 'deliverable'. They are also in multiple ownerships, in active use by commercial operators and not included in the SHLAA and are also not considered developable.			0	0	0	0	0	0%	0
K28	0.58	75%	0.44	0.39	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Premier Inn Hotel	1	2017/30572 - Full planning for extension to an existing public house approved with conditions 01/08/17			0	0	0	0	0	0%	0	
K29	0.43	75%	0.32	0.29	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Village Hotel	1			0	0	0	0	0	0%	0		
K30	0.36	75%	0.27	0.24	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Village Hotel	2			0	0	0	0	0	0%	0		
K31	0.88	75%	0.66	0.59	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Car park	1			0	0	0	0	0	0%	0		
Total					592	###	743	107	2542				1156	82	275	345	454	1156						592	1100	743	107	2542		2422		

Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018						PEGASUS ASSESSMENT BASED ON						PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY ON AVAILABILITY / DELIVERABILITY								
	Parcel Area	% of Site for Residential as Assumed by Council	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)
COMBINED TOTAL (TOWN CENTRE / WATERFRONT)				###	###	###	594	6549				3018	495	1074	995	454	3018							###	2399	1778	368	5648		4187

**Stadium Quarter (Parcels A1-A7, A20-A28, A30-A32)**

The plan envisages the creation of a high density residential community with good access to the town centre, supported by a mix of commercial, office, retail, education and leisure uses.

Whilst some of the parcels are vacant in the Stadium Quarter some contain established and successful operations. Nevertheless, many of the parcels are included in the SHLAA, and on this basis there is a reasonable prospect that they would be delivered, although some of the SHLAA sites are not being promoted by the landowner.



Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018					Active Use(s)	PEGASUS ASSESSMENT BASED ON										PEGASUS DISCOUNT FOR NON-DELIVERY/UNCERTAINTY				
	Parcel Area	% of Site for Residential as Assumed by	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years		6-10 Years	11-15 Years	16-20 Years	Total	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)
<b>Stadium Quarter</b>																														
A1	0.31	100%	0.31	0.28	0	20	4	0	24	-	-	-	0	0	0	0	0	0	No	Two vacant warehouse buildings.	1		We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4). However, there is no delivery mechanism to bring forward these parcels, they have not been put forward as part of the SHLAA process and no applications have been submitted for residential use. That said, we note these parcels are vacant and each appear to be in single ownership so there is a reasonable prospect that they could be redeveloped during the plan period but they are not considered 'deliverable' yet and have been included in the 'developable' 6-10 years supply. Noting the lack of promotion through the SHLAA we have applied a delivery ratio of 75% as it cannot be guaranteed at this stage that they are available for residential development.	0	20	2	0	22	75%	17
A2	0.71	100%	0.71	0.64	0	35	20	0	55	-	-	-	0	0	0	0	0	0	No		1			0	35	18	0	53	75%	40
A3	0.51	100%	0.51	0.46	0	0	19	0	19	-	-	-	0	0	0	0	0	0	No		1			0	0	19	0	19	75%	14
A4	0.45	100%	0.45	0.41	0	0	17	0	17	-	-	-	0	0	0	0	0	0	No		1			0	0	17	0	17	75%	13
A5	0.72	100%	0.72	0.65	0	0	27	0	27	-	-	-	0	0	0	0	0	0	No		1			0	0	27	0	27	75%	20

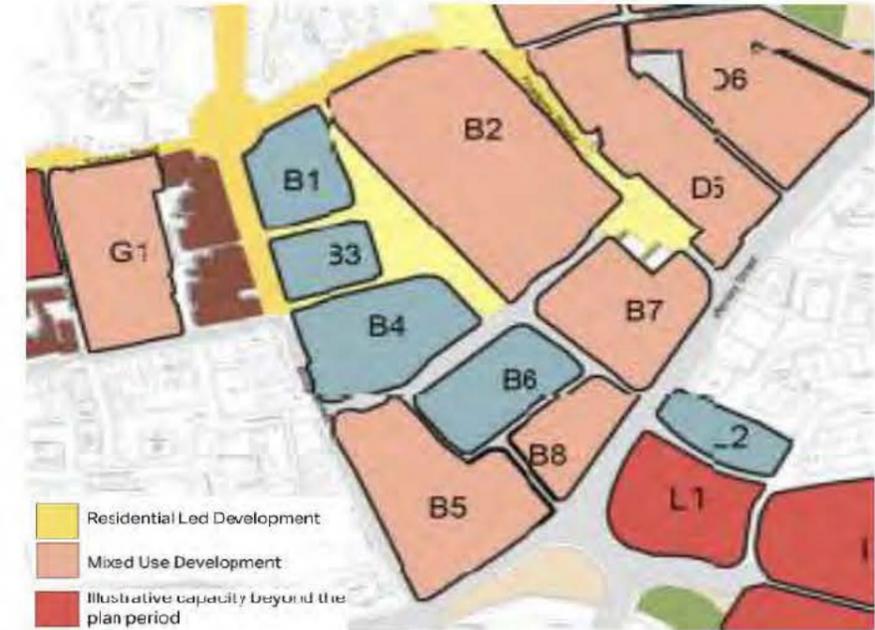
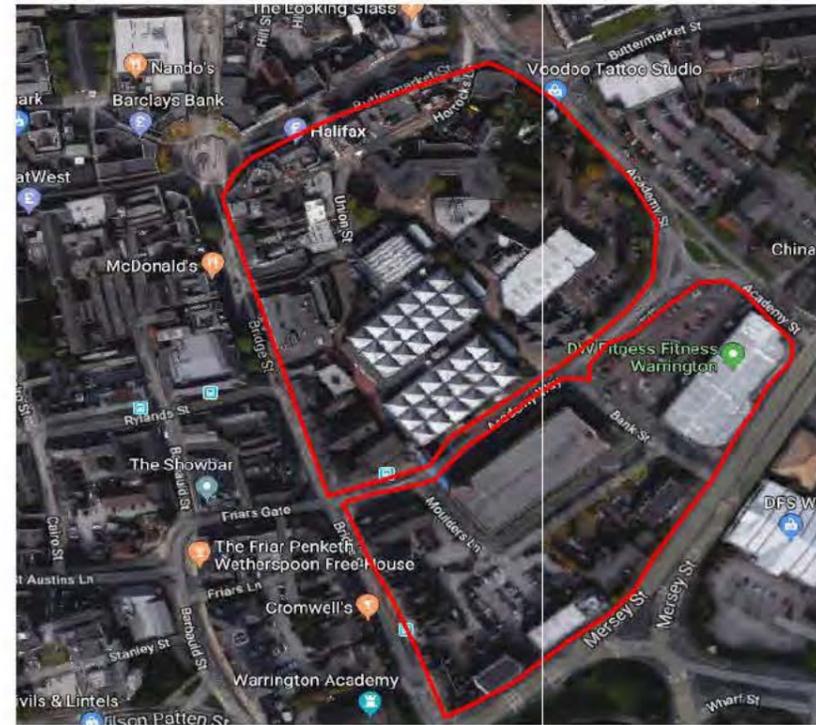
A6	0.8	100%	0.80	0.72	0	20	24	0	44	-	-	-	0	0	0	0	0	0	Yes	Occupied office building and vehicle rental business.	3		There is no planning history for residential use so the parcels are not considered 'deliverable'. These parcels are also not considered 'developable' within the plan period as there is no delivery mechanism to bring them forward, they are currently in active use and there are multiple land titles.	0	0	0	0	0	0%	0
A7	1.17	100%	1.17	1.05	0	35	74	0	109	-	-	-	0	0	0	0	0	0	Yes		4			0	0	0	0	0	0%	0
A20	1.93	82%	1.59	1.43	0	165	35	0	200	1401	Yes	Yes	20	0	20	0	0	20	Yes	Offices, car park, pub, convenience store, car wash	13	2013/22881 - Full application for business start-up "incubator" units (Use Class B1(a) and (b)) with associated access, parking, landscaping and infrastructure. 2017/31295 - Discharge of conditions for the above.	There is no planning history for residential use so the parcels are not considered 'deliverable'. Moreover there is a recently implemented consent for new office 'incubator' units on part of the site.  Since part of this parcel is included in the SHLAA, we have retained this element in the 'developable' supply but even the SHLAA only assumes 20 units. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4). The Council's masterplan assumes 82% of this site will come forward for housing at 140 dph. We consider this to be unrealistic given the 13 titles and lack of SHLAA submissions. We therefore reduce this by 50%	0	165	21	0	186	50%	93
A21/22	1.02	100%	Figures not calculated due to extant permission		362	0	0	0	362	1029	No	Yes	362	134	228	0	0	362	Yes	Largely vacant site although there is also a kebab shop, car park, furniture shop, fish and chip shop, appliances store.	10	2017/31394 - Full planning application for 362 C3 apartments approved 30/07/2018. 2018/34128 - Discharge of conditions 3, 5, 6, 10, 13, 16, 17 partly discharged 03/04/19.	There is full consent for 362 dwellings which is considered 'deliverable'.	362	0	0	0	362	100%	362
A24	1.13	50%	0.57	0.51	110	30	0	0	140	2480	No	No	38	0	0	38	0	38	Yes	Largely vacant site although there are some businesses operating including Enterprise Rent a Car.	8	2017/31120 - application for Car Rental Garage. Approved with condition 14/07/2017. 2018/33441 - application for an advertisement sign for Enterprise Rent a Car	There is no planning history for residential use so the parcels are not considered 'deliverable'. The site is being promoted through the SHLAA which has identified a capacity of 38 dwellings during 11-15 years. Since this parcel is included in the SHLAA we have retained this element in the 'developable' supply but note that this is only a small proportion of what the Council assume through the masterplan approach. Due to the number of ownerships and existing businesses on the site, we apply a ratio of 50%	0	110	30	0	140	50%	70
A25	0.31	50%	0.16	0.14	38	0	0	0	38	2681	Yes	No	38	0	38	0	0	38	Yes	Small warehousing/office space (electricity services etc)	6		There is no planning history for residential use so this parcel is not considered 'deliverable'. This parcel is included in the SHLAA 2018 which has identified a capacity of 38 dwellings during 6-10 years although it is not being promoted by the landowners and there is no developer interest. Nevertheless, we have therefore included this in the 'developable' supply.	0	38	0	0	38	75%	29
A26	0.28	50%	0.14	0.13	35	0	0	0	35	-	-	-	0	0	0	0	0	0	No	Vacant	6	2011/18856 - listed building application approved with cons 21/10/2011 related to application 2011/18854 for a change of use from office B1 to health surgery D1	There is no planning history for residential use so the parcels are not considered 'deliverable'. It appears to be in 6 ownerships but we note the land is largely vacant and therefore could be 'developable' within the 6-10 years supply. However, there is no delivery mechanism to bring forward this parcel.	0	35	0	0	35	50%	18

A27	0.19	50%	0.10	0.09	0	24	0	0	24	2471	Yes	No	74	0	0	74	0	74	Yes	Car park associated with adjacent retail park	2	<b>2017/31441</b> - Discharge of Condition 5, 11, 13 08/12/2017 on approved land on <b>2016/29311</b> for a single storey building for A1 and/or A3 with parking and landscaping.	There is no planning history for residential use so this parcel is not considered 'deliverable'. Moreover, there is a recent consent for A1 and / or A3. Whilst this parcel is included in the SHLAA with expected delivery during 11-15 years although, it is not being promoted by the landowners and there is no known developer interest. Given the site is occupied by commercial tenants, we have assumed zero development on this site during the plan period.	0	0	24	0	24	0%	0								
A28	1.69	10%	0.17	0.15	0	42	0	0	42										Yes	Retail park containing Sofology, Carpet Right, Wickes and a children's play centre.	2											0	0	42	0	42	0%	0
A30	0.61	75%	0.46	0.41	0	0	0	0	0	2682	Yes	No	80	0	0	80	0	80	Yes	Majestic Wine Warehouse, Johnsons Dry Cleaning Services and a small car parking area	3		There is no planning history for residential use so these parcels are not considered 'deliverable'. These parcels are included in the SHLAA which has identified a capacity of 80 dwellings during 11-15 years although it is not being promoted by the landowners and there is no developer interest. Given the active uses on the site, we do not consider the site to be available or developable and have assumed zero development on these parcels	0	0	0	0	0	0%	0								
A31	0.41	100%	0.41	0.37	0	0	18	0	18										Yes	Car Sales Garage and Forecourt	1											0	0	0	18	18	0%	0
A32	0.34	100%	0.34	0.31	0	0	0	0	0										Yes	Car Sales Garage and Forecourt	1												0	0	0	0	0	0%
<b>Total</b>					545	371	238	0	1154				612	134	286	192	0	612							362	403	200	18	983		675							

**Bridge Street Quarter**

The plan says that the Council will continue to work with its partners to support the ongoing delivery of the Bridge Street Quarter for mixed use development including leisure, retail, entertainment, offices and residential uses.

Each of the parcels within the Bridge Street Quarter and most have multiple land titles. Furthermore, none of the parcels are included in the SHLAA sites. On this basis it is no considered that there is a reasonable prospect they will be available and viably developed.

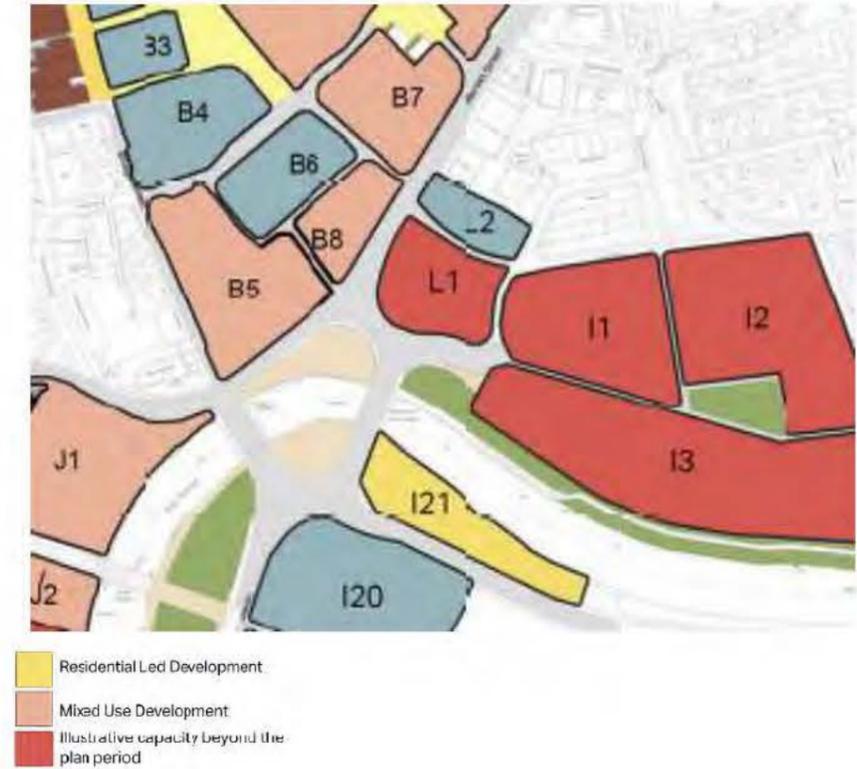
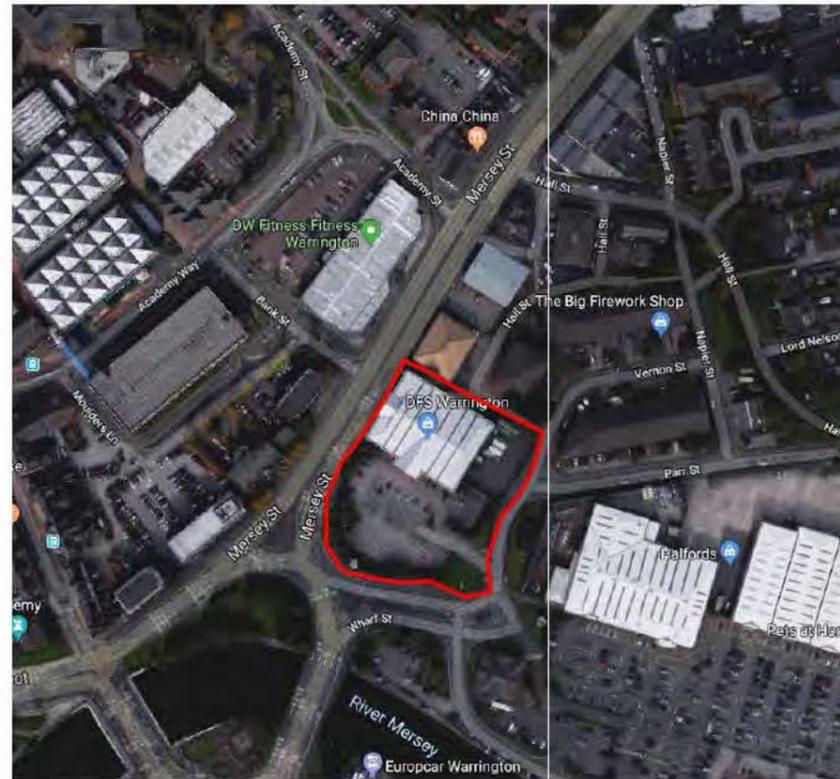


Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018					Active Use(s)		Current Use		Land Titles		Planning History		Comments	PEGASUS ASSESSMENT BASED ON					PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY		
	Parcel Area	% of Site for Residential as Assumed by	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History		Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)
<b>Bridge Street Quarter</b>																															
B2	1.65	30%	0.50	0.45	62	0	0	0	62	-	-	-	0	0	0	0	0	0	Yes	There are a number of commercial/retail units, including: HSBC, McColls, Burger King, Hancock and Wood, Skipton Building Society, Crawshaws, Sweet Shop, Halifax,	16	There a multitude of planning applications across this area within the town centre particularly across Parcels B2 and B5. The most transformational relates to application ref: <b>2014/24473</b> for a mixed use commercial development including new retail space, offices and a new market area by Muse. It was approved December 2014 and various conditions discharged. Redevelopment has commenced and it is anticipated to open in 2020.	We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4) on the assumption that some residential development was delivered. However, we have not been able to find specific permissions for residential permissions within this parcel and notably the SHLAA makes no reference to such permissions. Due to much of the area being under development within Parcels B2 and B5 for commercial use we have applied a 0% development ratio until such time that the Council might provide counter evidence on any relevant permissions. Parcels B7 and B8 are still in active commercial use but due to the limited ownerships we have assumed 50% development ratio until such time that further evidence is provided by the Council.	0	0	58	0	58	0%	0	
B5	0.84	50%	0.42	0.38	53	0	0	0	53	-	-	-	0	0	0	0	0	Yes	Derelict Building, Sports and Music Bar, Bridges Pub, Fast food Takeaways	15					0	0	49	0	49	0%	0
B7	0.61	50%	0.31	0.27	0	38	0	0	38	-	-	-	0	0	0	0	0	Yes	DW Fitness Gym and Associated Car Park	1					0	0	35	0	35	50%	18
B8	0.39	50%	0.20	0.18	0	25	0	0	25	-	-	-	0	0	0	0	0	Yes	Job Centres and Employment Agencies	4					0	0	23	0	23	50%	12
<b>Total</b>					<b>115</b>	<b>63</b>	<b>0</b>	<b>0</b>	<b>178</b>				<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>							<b>0</b>	<b>0</b>	<b>165</b>	<b>0</b>	<b>165</b>		<b>29</b>	

**Wharf Street Quarter (part of Southern Gateway)**

At the Southern Gateway the plan envisages the creation of a new residential community off Wilderspool Causeway and Loushers Lane, together with a new river front commercial area adjacent to Bridgefoot/St James Church.

This parcel is in active use and has multiple land titles. Furthermore, it is not included in the SHLAA sites. On this basis it is not considered that there is a reasonable prospect it will be available and viably developed.



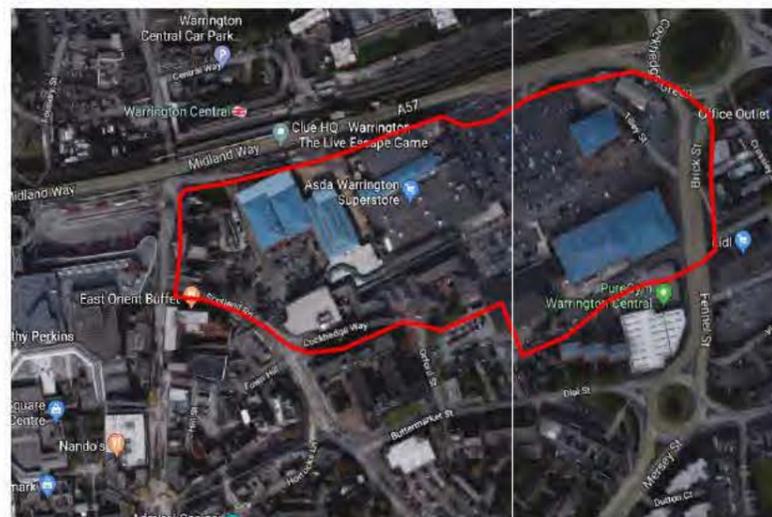
Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018						PEGASUS ASSESSMENT BASED ON										PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY					
	Parcel Area	% of Site for Residential as Assumed by	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Council	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)	
<b>Wharf Street Quarter</b>																															
L1	0.57	25%	0.14	0.13	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	DFS and associated car park	3		There is no planning history for residential use so this parcel is not considered 'deliverable'. We agree that it is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward, the site is in active commercial use and has not been promoted through the SHLAA.	0	0	0	0	0	0%	0	
<b>Total</b>					<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>				<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>							<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		<b>0</b>	

**Cockhedge (part of Eastern Gateway)**

At the Eastern Gateway (including Cockhedge/St Mary's Quarter/St Elphin's Quarter/Thornycroft) the plan envisages the creation of a high density residential community in close proximity to the town centre supported by a mix of commercial and employment uses.

This area comprises Cockhedge Shopping Centre and the adjoining large scale, leisure and retail uses.

There is no planning history for residential use so these parcels are not considered 'deliverable'. They are also not considered 'developable' within the plan period as there is no delivery mechanism to bring them forward, they are in active use and there is no indication that leases are due to expire.



Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018					PEGASUS ASSESSMENT BASED ON				PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY												
	Parcel Area	% of Site for Residential as Assumed by	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Council	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)	
<b>Cockhedge Quarter</b>																															
C1	0.81	80%	0.65	0.58	0	55	105	0	160	-	-	-	0	0	0	0	0	0	No	This is a series of vacant and redundant Victorian and later buildings, some of which are being marketed and some of which are in active commercial use.	11	2019/34532 - Full planning application for conversion of existing vacant coach house to a 15 bedroom Sui Generis HMO with communal facilities. Application registered 01/03/19. 2017/31520 - Advertisement sign for Cockhedge Shopping Centre.	There is no planning history for residential C3 use so the parcel is not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward, and there are multiple titles across the parcel. The Council assume 80% of the gross area of the parcel could be redeveloped for residential development delivering 160 units at a density of 275 dph. Whilst we note this location near the station could accommodate high density development, thus loss of the existing buildings (some of which have good character) has not been scrutinised and we consider conversion/change of use and extensions to the existing buildings are likely to prove more viable noting recent permissions. We therefore apply a lower density of 130 dph albeit with a deliverability ratio of just 50% given the extent of ownerships and existing active uses whilst noting some units are vacant and on the market.	0	25	50	0	75	50%	38	
C2	0.43	80%	0.34	0.31	0	35	50	0	85	-	-	-	0	0	0	0	0	0	Yes	Buzz Bingo, Wilkinsons Store, Asda, B&M	1	There is no planning history for residential use so these parcels are not considered 'deliverable'. Whilst each parcel is within individual ownerships, they are not considered 'developable' within the plan period as there is no delivery mechanism to bring them forward, each is in active commercial use and there is no indication that leases are due to expire. Furthermore, none of the parcels have been put forward in the SHLAA. It is not considered that there is a reasonable prospect they will be available and could be viably developed.	0	0	0	0	0	0	0%	0	
C4	0.27	50%	0.14	0.12	0	0	0	0	0	-	-	-	0	0	0	0	0	Yes	1		0		0	0	0	0	0	0	0%	0	
C5	0.24	50%	0.12	0.11	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1		0	0	0	0	0	0	0	0%	0
C6	0.31	50%	0.16	0.14	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1		0	0	0	0	0	0	0	0%	0
C7	0.25	80%	0.20	0.18	0	35	15	0	50	-	-	-	0	0	0	0	0	0	Yes		1		These parcels are occupied by Changing Lives in Warrington furniture store.	0	0	0	0	0	0	0%	0
C8	0.43	80%	0.34	0.31	0	35	50	0	85	-	-	-	0	0	0	0	0	0	Yes		1			0	0	0	0	0	0	0	0%

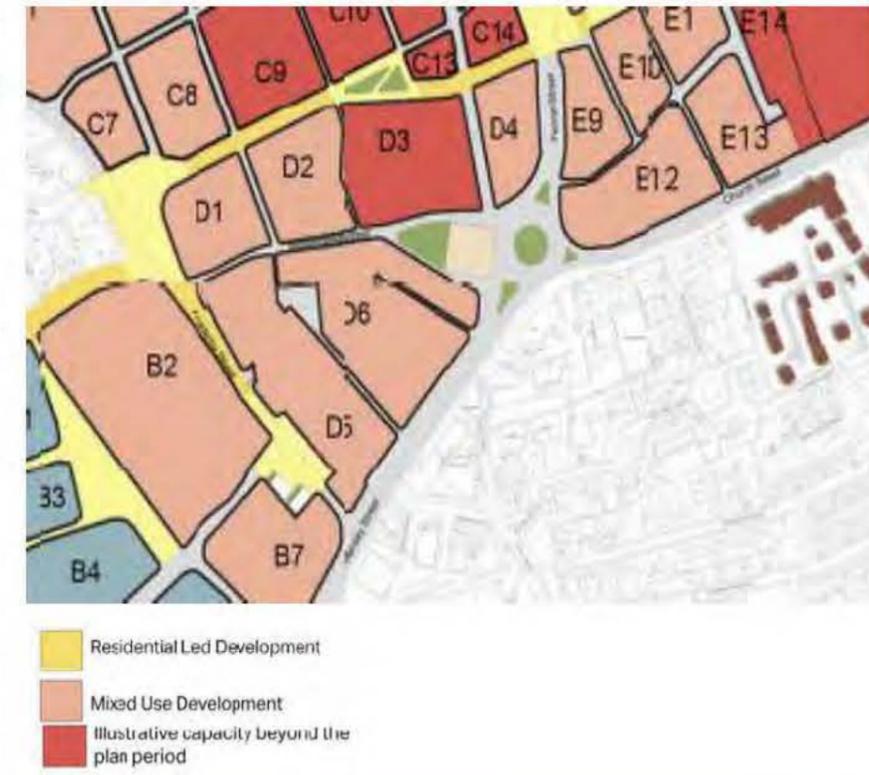
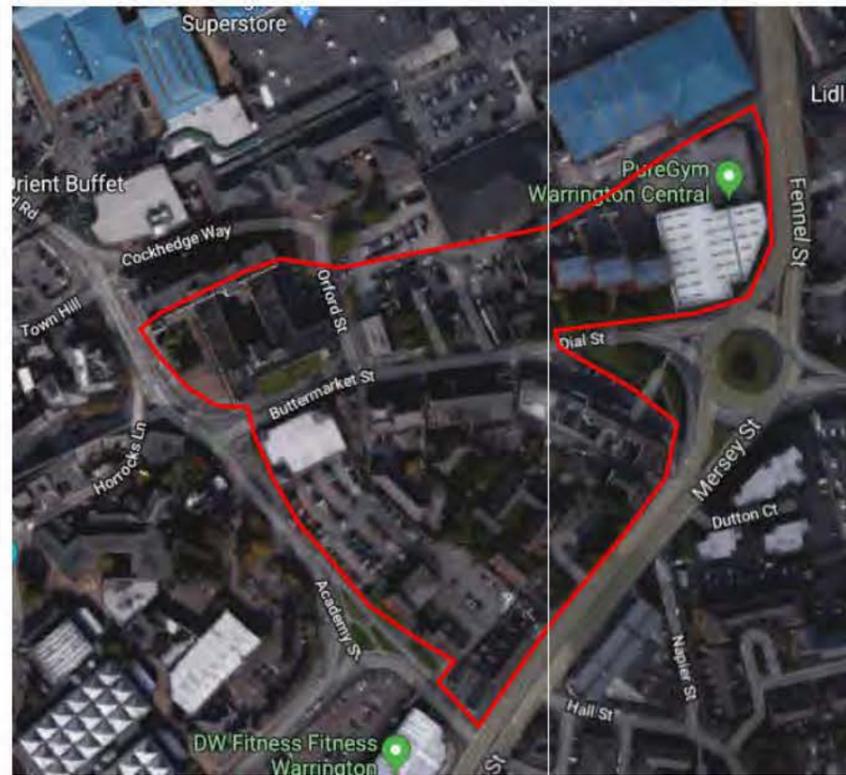
C9	0.6	50%	0.30	0.27	0	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	These parcels comprise of the Cockhedge Shopping Centre and separate units including Argos, Xercise4Less etc.	1				0	0	0	0	0	0%	0
C10	0.45	50%	0.23	0.20	0	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1				0	0	0	0	0	0%	0
C11	0.31	50%	0.16	0.14	0	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1				0	0	0	0	0	0%	0
C12	0.29	50%	0.15	0.13	0	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1				0	0	0	0	0	0%	0
C13	0.08	50%	0.04	0.04	0	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1				0	0	0	0	0	0%	0
C14	0.17	50%	0.09	0.08	0	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1				0	0	0	0	0	0%	0
<b>Total</b>					<b>0</b>	<b>160</b>	<b>220</b>	<b>0</b>	<b>380</b>					<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>						<b>0</b>	<b>25</b>	<b>50</b>	<b>0</b>	<b>75</b>		<b>38</b>	

**St Mary's Quarter (part of Eastern Gateway)**

At the Eastern Gateway (including Cockhedge/St Mary's Quarter/St Elphin's Quarter/Thorneycroft) the plan envisages the creation of a high density residential community in close proximity to the town centre supported by a mix of commercial and employment uses.

The identified parcels are currently occupied by established uses which are likely to have long leases. It is noted that there are a large number of land owners over the plots. The sites are also within close proximity to St Mary's Shrine Church, which constrains future potential development.

That said, many of the parcels are included in the SHLAA and are considered developable and one parcel has residential consent so is considered deliverable.



Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018					PEGASUS ASSESSMENT BASED ON					PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY											
	Parcel Area	% of Site for Residential as Assumed by	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Owner	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)	
<b>St Mary's Quarter</b>																															
D1	0.41	80%	0.33	0.30	70	11	0	0	81	2673	Yes	No	203	0	127	76	0	203	Yes	New Town House. Large 1960's office block. Council offices.	3	We understand there has been an application made for prior approval to demolish the buildings but no applications for residential development.	The Council have applied a very high density at 275 dph but we agree there is scope to accommodate a high density on this site due to the scale of the existing buildings. There is no planning history for residential use so these parcels are not considered 'deliverable' within 0.5 years. That said, the limited ownerships and Council control suggests there might be some prospect of delivery during the Local Plan. We note that the Council are intending to relocate to Times Square but there is no direct evidence of this submitted as part of the Local Plan.	0	70	11	0	81	75%	61	
D2	0.48	80%	0.38	0.35	0	95	0	0	95		Yes								Yes	Car park and small office	9	Whilst there are various titles across this we believe the majority of the land is controlled by the Council and would become available following the relocation of the Council. We have applied the same assumptions as per Parcel D1.		0	95	0	0	95	75%	71	
D3	0.75	20%	0.15	0.14	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Various office buildings within a series of Georgian buildings	1	There is no planning history for residential use so this parcel is not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward		0	0	0	0	0	0%	0	



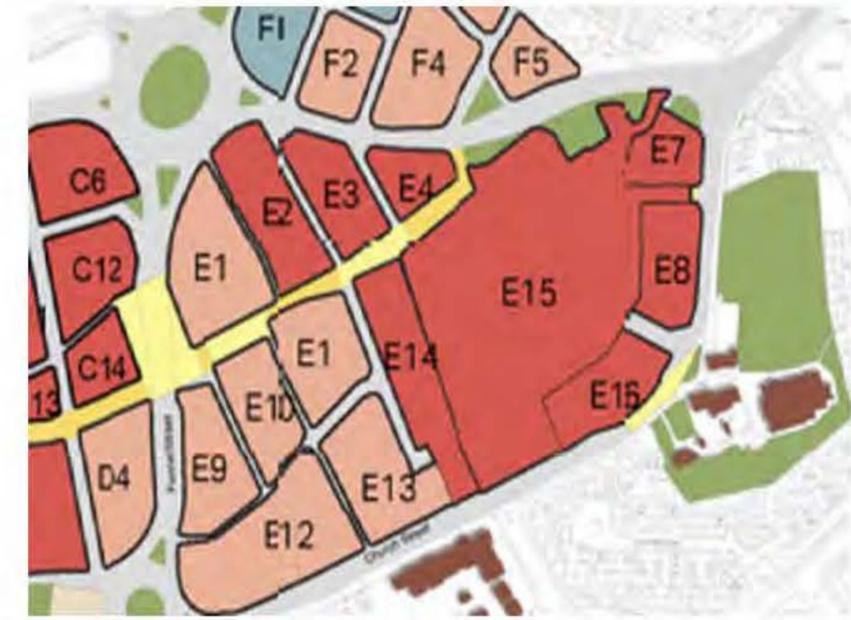
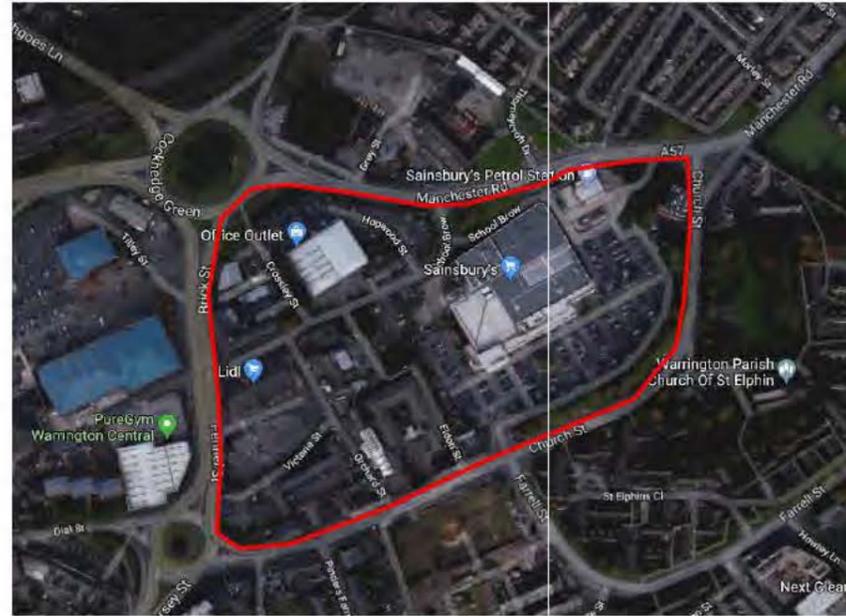
**St Elphin's Quarter (part of Eastern Gateway)**

At the Eastern Gateway (including Cockhedge/St Mary's Quarter/St Elphin's Quarter/Thorneycroft) the plan envisages the creation of a high density residential community in close proximity to the town centre supported by a mix of commercial and employment uses.

There are a number of established commercial uses within the site including a Sainsbury's superstore and petrol station. Therefore some site remediation will be required if residential uses are proposed. Other supermarkets include a Lidl and Farm Foods.

There are a number of landowners across the quarter. It is expected that the existing uses will be subject to long leases with extend beyond the plan period.

That said, some of the parcels are included in the SHLAA and are considered developable.



- Residential Led Development
- Mixed Use Development
- Illustrative Capacity Beyond the plan period

Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018							PEGASUS ASSESSMENT BASED ON										PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY			
	Parcel Area	% of Site for Residential as Assumed by	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Council	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)
<b>St Elphins Quarter</b>																														
E1	0.43	50%	0.22	0.19	0	27	0	0	27	2477	Yes	No	33	0	0	33	0	33	Yes	Office space and disused buildings.	8		There is no planning history for residential use so the parcels are not considered 'deliverable' but they have been included in the 'developable' 6-10 years supply. There is no delivery mechanism to bring forward this parcel. That said, some of the buildings appear vacant and whilst in multiple ownerships there could be some prospect of redevelopment/re-use. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4) and applied a 50% delivery risk ratio.	0	0	27	0	27	50%	14
E2	0.39	75%	0.29	0.26	0	0	0	0	0	2481	Yes	No	42	0	42	0	0	42	Yes	Dreams, Farm foods and Office Outlet	3		There is no planning history for residential use so this parcel is not considered 'deliverable'. This parcel is included in the SHLAA 2018 which has identified a capacity of 42 dwellings during 11-15 years although it is not being promoted by the landowners and there is no developer interest. We also note that there are 3 registered titles relating to the land suggesting multiple ownership issues. The Council have not assumed it would come forward and we have no evidence to suggest it would.	0	0	0	0	0	0%	0
E3	0.27	90%	0.24	0.22	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Car Park	1			0	0	0	0	0	0%	0
E4	0.15	100%	0.15	0.14	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Open space	4			0	0	0	0	0	0%	0

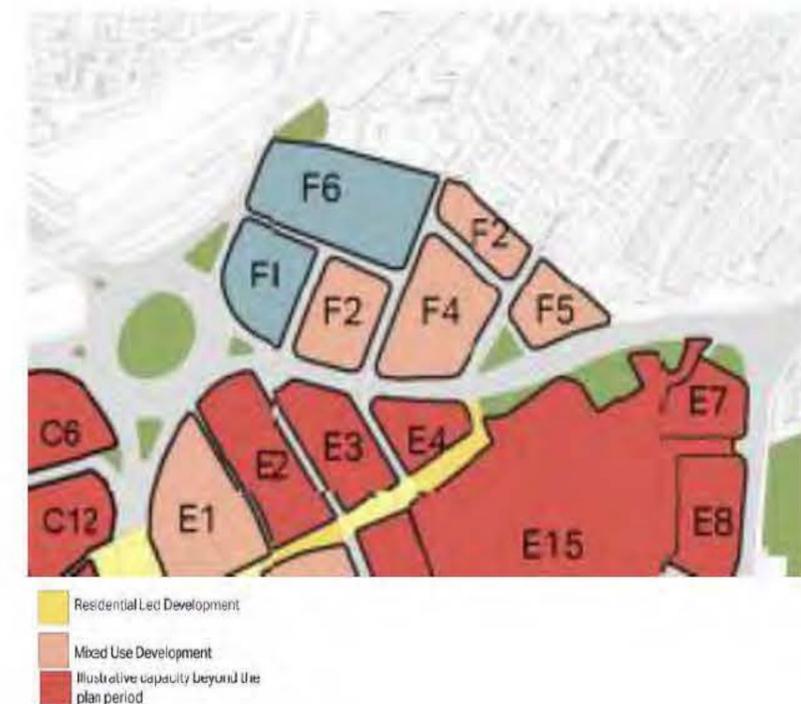
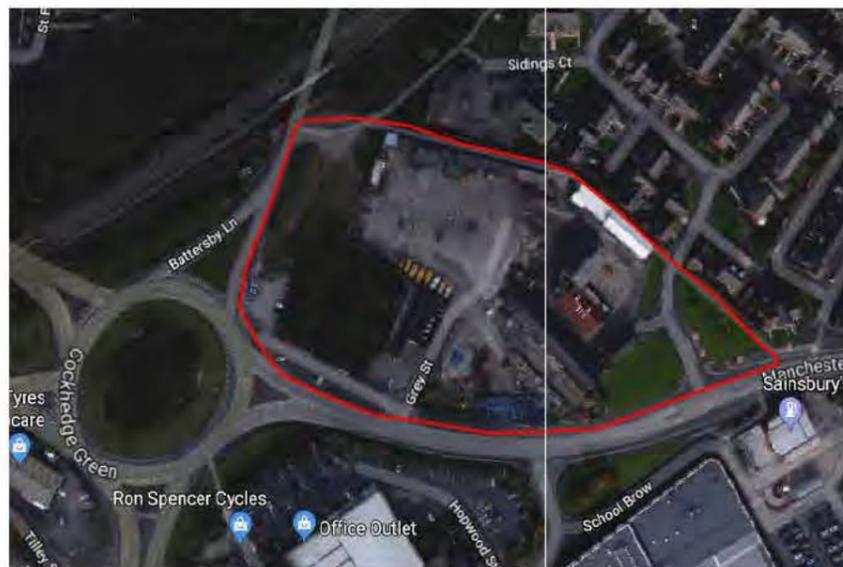
E5	0.15	100%	0.15	0.14	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Sainsburys store	2			0	0	0	0	0	0%	0
E6	0.33	100%	0.33	0.30	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Sainsburys store	2			0	0	0	0	0	0%	0
E7	0.47	100%	0.47	0.42	0	0	0	0	0	-	-	-	0	0	0	0	0	0	No	Vacant office (?)	1			0	0	0	0	0	0%	0
E8	0.5	100%	0.50	0.45	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Sainsburys store	2			0	0	0	0	0	0%	0
E9	0.3	80%	0.24	0.22	0	20	10	0	30	-	-	-	0	0	0	0	0	0	Yes	Lidl and car park	1	2018/33032 - Advertisement application for Lidl approved 08/08/2018	There is no planning history for residential use so this parcel is not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward, it is in active use and there is no indication that the lease is due to expire. It is not considered that there is a reasonable prospect it will be available and could be viably developed.	0	20	10	0	30	0%	0
E10	0.28	100%	0.28	0.25	0	0	20	0	20	-	-	-	0	0	0	0	0	0	No	Derelict buildings	7		There is no planning history for residential use so the parcels are not considered 'deliverable' but they have been included in the 'developable' 6-10 years supply. There is no delivery mechanism to bring forward this parcel. That said, it appears vacant and whilst in multiple ownerships there could be a reasonable prospect of it being developed. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4) and applied a 50% delivery risk ratio.	0	18	0	0	18	50%	9
E11	0.31	70%	0.22	0.20	0	0	13	0	13	2478	Yes	No	44	0	0	44	0	44	Yes	Yard filled waste	7		There is no planning history for residential use so this parcel is not considered 'deliverable'. This parcel is included in the SHLAA 2018 which has identified a capacity of 44 dwellings during 11-15 years although it is not being promoted by the landowners and there is no developer interest. We also note that there are 7 registered titles relating to the land suggesting multiple ownership issues. As such, we have applied a delivery risk ratio of 25%.	0	0	13	0	13	25%	3
E12	0.62	20%	0.12	0.11	0	16	0	0	16	-	-	-	0	0	0	0	0	0	Yes	Shop, MOT garage, Car Wash, Existing Houses, Small Car Park.	18		There is no planning history for residential use so this parcel is not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward, it is in active use and there is no indication that the lease is due to expire and the site was not promoted in the SHLAA. Coupled with multiple ownerships and various uses, there is no evidence to suggest this site is developable within the plan period. However, we also note that the Council only assume 20% of the site would be redevelopment. As such, we've allowed a 50% delivery risk ratio on the basis that one of the ownerships might come forward.	0	0	16	0	16	50%	8
E13	0.38	90%	0.34	0.31	0	15	0	0	15	-	-	-	0	0	0	0	0	0	Yes	Retirement home and small industrial/retail unit.	3		There is no planning history for residential use so this parcel is not considered 'deliverable'. It is also not considered 'developable' within the plan period and is in active use. It is not considered that there is a reasonable prospect it will be available and could be viably developed. However, we note the Council only assume 50% of the site would be redeveloped which could relate to the industrial unit near the care home. We apply a 50% delivery risk ratio on the basis that the site was not promoted through the SHLAA.	0	15	0	0	15	50%	8
E14	0.46	50%	0.23	0.21	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Sainsburys store	1		There is no planning history for residential use so these parcels are not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward, it is in active use and the occupiers have made representations during the previous consultation process that the masterplan fails to take account of this existing uses.	0	0	0	0	0	0%	0
E15	0.44	75%	0.33	0.30	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1		0	0	0	0	0	0%	0	
E16	0.3	100%	0.30	0.27	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		1		0	0	0	0	0	0%	0	
<b>Total</b>					<b>0</b>	<b>78</b>	<b>43</b>	<b>0</b>	<b>121</b>				<b>119</b>	<b>0</b>	<b>42</b>	<b>77</b>	<b>0</b>	<b>119</b>					<b>0</b>	<b>53</b>	<b>66</b>	<b>0</b>	<b>119</b>		<b>41</b>	

**Thorneycroft (part of Eastern Gateway)**

At the Eastern Gateway (including Cockhedge/St Mary's Quarter/St Elphin's Quarter/Thorneycroft) the plan envisages the creation of a high density residential community in close proximity to the town centre supported by a mix of commercial and employment uses.

Much of the area is associated with the Waste Transfer Station. There are some road-edge parcels which comprise open land. Given the existing use, remediation may be required prior to the development of the site for residential uses. Medium density, 2 storey dwellings are located to the rear of the area.

That said, the parcels are included in the SHLAA and are considered developable.



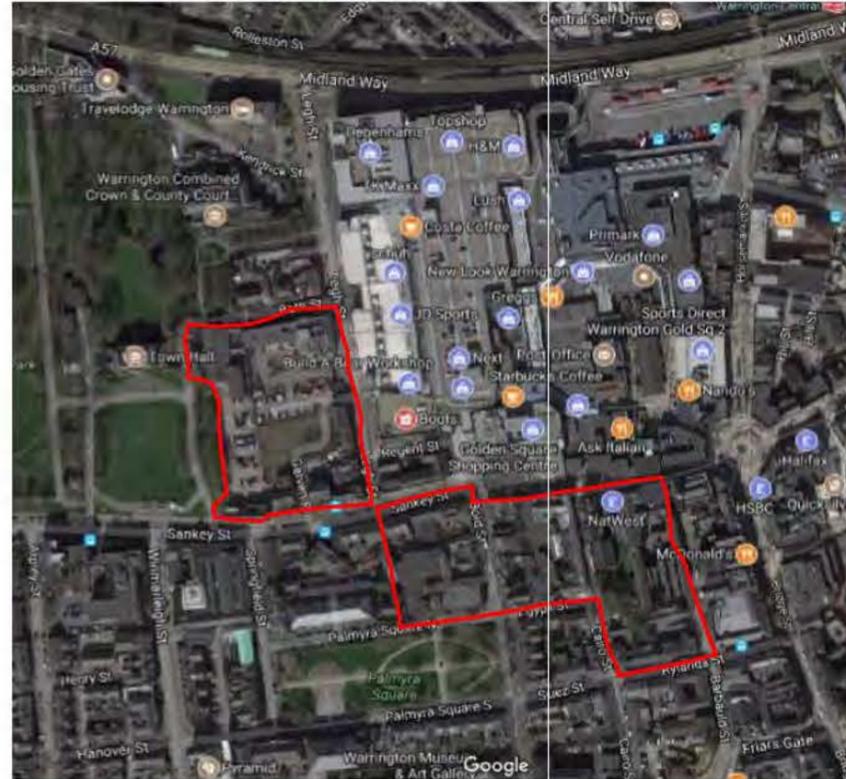
Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018					Active Use(s)		Current Use		Land Titles		Planning History		Comments	PEGASUS ASSESSMENT					PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY		
	Parcel Area	% of Site for Residential as Assumed by	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Council	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History		Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)
<b>Thorneycroft</b>																															
F2	0.31	50%	0.16	0.14	7	0	0	0	7									Yes	Waste transfer station (B2)	2					0	7	0	0	7	25%	2
F3	0.23	50%	0.12	0.10	14	0	0	0	14	1710	Yes	No	65	0	65	0	0	65	No	Unoccupied space within the Waste Transfer Station's yard	1	2019/34646 - change of use of land from B1 (light industrial) to open a car storage for 150 cars (Use Class B8) for temporary period of 2 years. Granted permission 18/04/19.	There is no planning history for residential use so these parcels are not considered 'deliverable'. This parcel is included in the SHLAA 2018 which has identified a capacity of 65 dwellings during 11-15 years although it is not being promoted by the landowners and there is no developer interest. We also note that there are 7 registered titles relating to the land suggesting multiple ownership issues. Only one parcel is not in active use but there is a recent consent on this parcel for open car storage. As such, we have applied a delivery risk ratio of 25%.	0	13	0	0	13	25%	3	
F4	0.36	50%	0.18	0.16	23	0	0	0	23									Yes	Waste transfer station (B2)	3					0	21	0	0	21	25%	5
F5	0.15	50%	0.08	0.07	3	0	0	0	3									No	Green space adjacent Waste Transfer Station	1					0	3	0	0	3	25%	1
<b>Total</b>					<b>47</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>47</b>				<b>65</b>	<b>0</b>	<b>65</b>	<b>0</b>	<b>0</b>	<b>65</b>							<b>0</b>	<b>44</b>	<b>0</b>	<b>0</b>	<b>44</b>		<b>11</b>

**Cabinet Works (part of the Cultural Quarter)**

The at Cultural Quarter (including Cabinet Works/Garven Place/Bank Park) the plan envisages a mix of cultural and small scale residential and office development on previously developed sites in the vicinity of Bank Park;

Central location development, partially located within a Conservation Area and includes part of Warrington's main retail centre. In general properties comprises ground floor commercial uses with offices and some residential uses above. A nightclub is located on Bold Street. There is a large proportion of town centre employees within this location, include the NHS Wellbeing Centre within Parcel G1 comprises.

That said, some of the parcels are included in the SHLAA and are considered developable and one parcel has residential consent.



Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018						PEGASUS ASSESSMENT										PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY				
	Parcel Area	% of Site for Residential as Assumed by	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Council	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)
<b>Cabinet Works</b>																														
G1	0.78	80%	0.62	0.56	79	0	0	0	79	2472	No	Yes	15	0	15	0	15	15	No	Largely vacant.	18	2017/31128 - Full Planning and demolition of an unlisted building in a conservation area - Proposed replacement of damaged/collapsed Roofs and Chimney, dismantling of existing archway wall and stone, stored to be rebuilt and Change of use from B1 to A3 & A4	There is no planning history for residential use so this parcel is not considered 'deliverable'. This parcel is included in the SHLAA which has identified a capacity of 15 dwellings during 11-15 years. On this basis, and owing to the fact that it is largely vacant, there is a reasonable prospect that some residential development could come forward. However, the SHLAA capacity is much lower than that identified in the masterplan and as such we have applied a delivery risk ratio of 75%. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4).	0	73	0	0	73	75%	55
G2	0.43	50%	0.22	0.19	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	A1, A2, A3 ground floor uses; including night club. C3, B1 above.	8		There is no planning history for residential use so this parcel is not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring it forward, it is in active use and there are multiple landowners.	0	0	0	0	0	0%	0

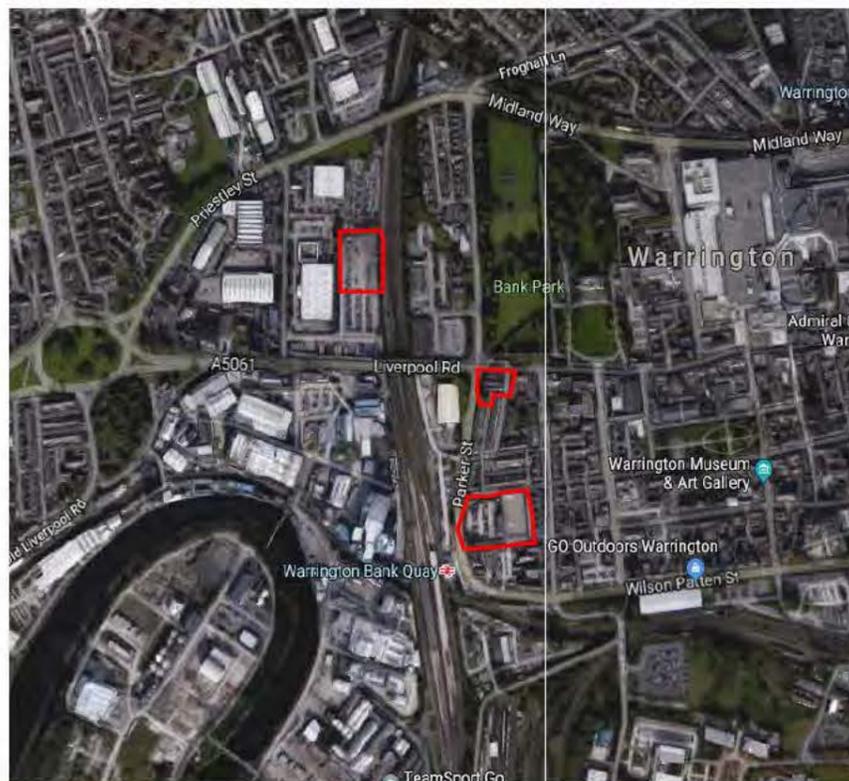
G3	0.47	50%	0.24	0.21	0	30	0	0	30	-	-	-	0	0	0	0	0	0	Yes	A1, A2, A3 ground floor uses, C3, B1 above.	18	<p><b>2018/32057</b> - Prior approval for change of use from B1 office to C3 residential use of 31 apartments on floors 1-3 with ground floor B1 office remaining. Approved 5/05/2018.</p> <p><b>2019/34273</b> - Demolition of existing Vicarage and constructing of 6 storey residential apartment block comprising 20 apartments to upper floors and commercial units to ground floor - undecided.</p>	There is full consent for residential development so we have retained this element in the supply.	0	30	0	0	30	100%	30
G4	1.38	20%	0.28	0.25	0	35	0	0	35	1755	No	Yes	25	0	25	0	0	25	Yes	NHS wellbeing centre, various A1, A2, B1, D2 uses.	1	There is no planning history for residential use so this parcel is not considered 'deliverable'. This parcel is included in the SHLAA which has identified a capacity of 25 dwellings during 6-10 years.. On this basis there is a reasonable prospect it will be available and could be viably developed as it is also being promoted by the landowner. However the SHLAA capacity is lower than that identified in the masterplan and the site is currently in active use so on this basis we have applied a delivery risk ratio of 75%. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4).	There is no planning history for residential use so this parcel is not considered 'deliverable'. This parcel is included in the SHLAA which has identified a capacity of 25 dwellings during 6-10 years.. On this basis there is a reasonable prospect it will be available and could be viably developed as it is also being promoted by the landowner. However the SHLAA capacity is lower than that identified in the masterplan and the site is currently in active use so on this basis we have applied a delivery risk ratio of 75%. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4).	0	33	0	0	33	75%	25
<b>Total</b>					<b>79</b>	<b>65</b>	<b>0</b>	<b>0</b>	<b>144</b>				<b>40</b>	<b>0</b>	<b>40</b>	<b>0</b>	<b>0</b>	<b>40</b>						<b>0</b>	<b>136</b>	<b>0</b>	<b>0</b>	<b>136</b>		<b>110</b>

### Bank Quay

The plan envisages the creation of an enhanced transport hub focused around Bank Quay Station, supported by a wide variety of uses.

Sites are located next to the railway line or on main road networks. Much of the surrounding area comprises medium density residential uses with some larger commercial and employment uses interspersed.

That said it is reasonable to assume that a small element of residential could come forward as part of the station area.



Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018					PEGASUS ASSESSMENT					PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY																										
	Parcel Area	% of Site for Residential as Assumed by	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Council	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)																
<b>Bank Quay</b>																																														
H6	0.1	50%	0.05	0.05	0	6	0	0	6	-	-	-	0	0	0	0	0	0	Yes	CCP Car park	2	2013/21830 - Full planning app for demolition of existing buildings and development of a car park up to 35 dwellings approved 26/07/2013	There is no live consent for residential use so this parcel is not considered 'deliverable'. The site is not included in the SHLAA and is in active use however we note that the Council consider that only half of the parcel is developable for residential use. We have therefore applied a development risk ratio of 50%.	0	6	0	0	6	50%	3																
H7	0.04	100%	0.04	0.04	0	2	0	0	2	-	-	-	0	0	0	0	0	0	Yes	Car park	2		There is no live consent for residential use so this parcel is not considered 'deliverable'. We note that the Council consider that the whole parcel will come forward for residential development but it is not in the SHLAA and is in active use. However on the basis that the plan envisages that the Bank Quay area is to be regenerated and there may be an opportunity for small parcels to come forward for residential development as part of that, we have applied a development risk ratio of 50%.	0	2	0	0	2	50%	1																

H9(H8)	0.11	100%	0.11	0.10	0	5	0	0	5	-	-	-	0	0	0	0	0	0	Yes	Office building	2	There is no live consent for residential use so this parcel is not considered 'deliverable'. We note that the Council consider that the whole parcel will come forward for residential development but it is not in the SHLAA and is in active use. However on the basis that the plan envisages that the Bank Quay area is to be regenerated and there may be an opportunity for small parcels to come forward for residential development as part of that, we have applied a development risk ratio of 50%.	0	5	0	0	5	50%	3
<b>Total</b>					<b>0</b>	<b>13</b>	<b>0</b>	<b>0</b>	<b>13</b>				<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>						<b>0</b>	<b>13</b>	<b>0</b>	<b>0</b>	<b>13</b>		<b>7</b>

**Southern Gateway**

At the Southern Gateway (including Wharf Street) the plan envisages the creation of a new residential community off Wilderspool Causeway and Loushers Lane, together with a new river front commercial area adjacent to Bridgefoot/St James Church.

The area connects the north and south of the River Mersey. The northern section comprises the established Riverside Retail Park.

To the south of the River the uses are more industrialised, comprising large scale B2 and B8 uses over parcels subject to multiple land owners. There is little to no consistency in the urban form within this area.

That said, some of the parcels are included in the SHLAA and are considered developable and one parcel has residential consent.



Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018					PEGASUS ASSESSMENT										PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY						
	Parcel Area	% of Site for Residential as Assumed by	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Council	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)	
<b>Southern Gateway</b>																															
I1	1.02	100%	1.02	0.92	0	0	0	0	0	-	-	-	0	0	0	0	0	0	0	0	0	1		There is no planning history for residential use so these parcels are not considered 'deliverable'. It is also not considered 'developable' within the plan period as there is no delivery mechanism to bring forward and it is in active use.	0	0	0	0	0	100%	0
I2	1.45	100%	1.45	1.31	0	0	0	0	0	-	-	-	0	0	0	0	0	0	0	0	1	Loading bay large A1 uses			0	0	0	0	0	100%	0
I3	2.25	100%	2.25	2.03	0	0	0	0	0	-	-	-	0	0	0	0	0	0	0	0	1	Car park ancillary to retail uses. Some A3/5 establishments including drive-through McDonald's and Harvester			0	0	0	0	0	100%	0
I4	2.45	100%	2.45	2.21	0	35	42	0	77	2482	Yes	No	129	0	129	0	0	129	Yes	Large scale B2, B8 uses.	1	2019/34260 - Proposed demolition of existing industrial units and construction of 9 new independent industrial units. Undecided.	There is no residential consent so these parcels are not considered 'deliverable'. The parcels are included in the SHLAA which has identified a capacity of 129 dwellings during 6-10 years. However, whilst the site is in single ownership it does not appear to be being promoted by the landowner and is in active use, and there is recent	0	35	42	0	77	50%	39	

I5	1.35	100%	1.35	1.22	0	35	17	0	52									Yes	Large scale B2, B8, D2 uses. Including a brewing company, smash repairs and flooring company.	1		consent for industrial use. On this basis we have applied a development risk ratio of 50%.	0	35	17	0	52	50%	26	
I8	1.68	20%	0.34	0.30	5	0	0	0	5	1752/1753	Part yes, part no	Yes	163/38	0	0	38	0	38	Yes	Large carpark ancillary to industrial uses, brownfield-former RLFC ground	2		There is no planning history for residential use so these parcels are not considered 'deliverable'. The parcels are included in the SHLAA which has identified a capacity of 129 dwellings during 6-10 years and this is a brownfield site. On this basis there is a reasonable prospect it will be available and could be viably developed.	5	0	0	0	5	100%	5
I11	0.87	100%	0.87	0.78	160	0	0	0	160	1752	No	Yes	163	135	28	0	0	163	Yes	B8, B2 uses	1	2018/33771 - Outline application for 160 residential units. Undecided.	0	160	0	0	160	100%	160	
I12	1.15	100%	1.15	1.04	35	2	0	0	37	-	-	-	0	0	0	0	0	0	Yes	Half waste land, half B2, B8 uses	1		There is no planning history for residential use so these parcels are not considered 'deliverable'. They are also not considered 'developable' within the plan period as there is no delivery mechanism to bring them forward, they are in active use and there are multiple land titles. Furthermore, these sites have not been put forward within the SHLAA and we have therefore applied a development risk ratio of 0%.	0	0	0	0	0	0%	0
I13	1.11	100%	1.11	1.00	0	0	0	57	57	-	-	-	0	0	0	0	0	0	Yes	B8, B2 uses	1			0	0	0	0	0	0%	0
I14	1.98	100%	1.98	1.78	0	0	0	89	89	-	-	-	0	0	0	0	0	0	Yes	B8, B2 uses	17			0	0	0	0	0	0%	0
I15	1.14	100%	1.14	1.03	0	0	0	98	98	-	-	-	0	0	0	0	0	0	Yes	B2/B8 uses	9			0	0	0	0	0	0%	0
I16	1.06	100%	1.06	0.95	0	0	91	0	91	-	-	-	0	0	0	0	0	0	No	Greenfield	1		There is no planning history for residential use so this parcel is not considered 'deliverable'. However, it is a vacant greenfield site in single ownership, so whilst not included within the SHLAA, could be considered 'developable' although we have applied a development risk ratio of 75%. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4).	0	0	86	0	86	75%	65
I17	1.21	100%	1.21	1.09	0	20	18	0	38	-	-	-	0	0	0	0	0	0	Yes	B2/B8 uses	2		There is no planning history for residential use so these parcels are not considered 'deliverable'. They are also not considered 'developable' within the plan period as there is no delivery mechanism to bring them forward, they are in active use and there are multiple land titles. Furthermore, these sites have not been put forward within the SHLAA and we have therefore applied a development risk ratio of 0%.	0	0	0	0	0	0%	0
I18	1.12	100%	1.12	1.01	0	20	15	0	35	-	-	-	0	0	0	0	0	0	Yes	B8 uses	2			0	0	0	0	0	0%	0
I19	1.26	100%	1.26	1.13	0	20	20	0	40	-	-	-	0	0	0	0	0	0	Yes	B8 uses	2			0	0	0	0	0	0%	0
<b>Total</b>					<b>200</b>	<b>132</b>	<b>203</b>	<b>244</b>	<b>779</b>				<b>330</b>	<b>135</b>	<b>157</b>	<b>38</b>	<b>0</b>	<b>330</b>						<b>5</b>	<b>230</b>	<b>145</b>	<b>0</b>	<b>380</b>		<b>294</b>

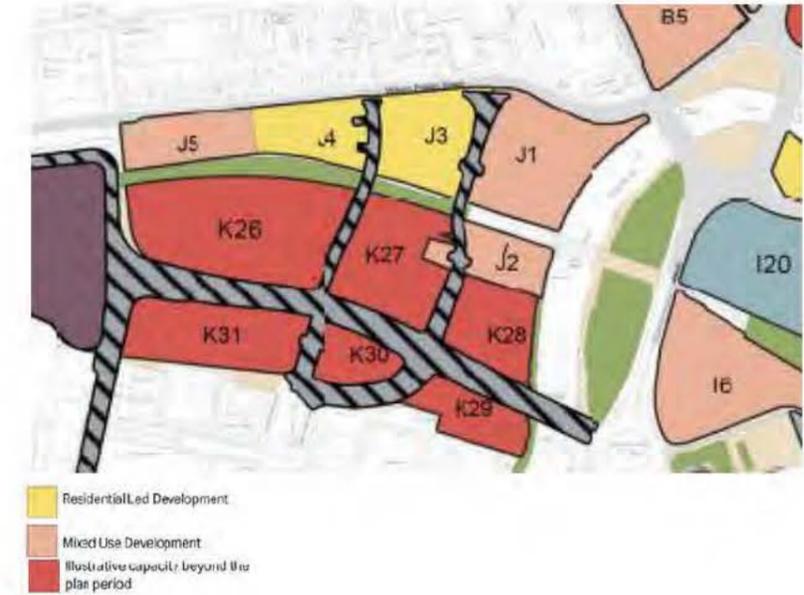
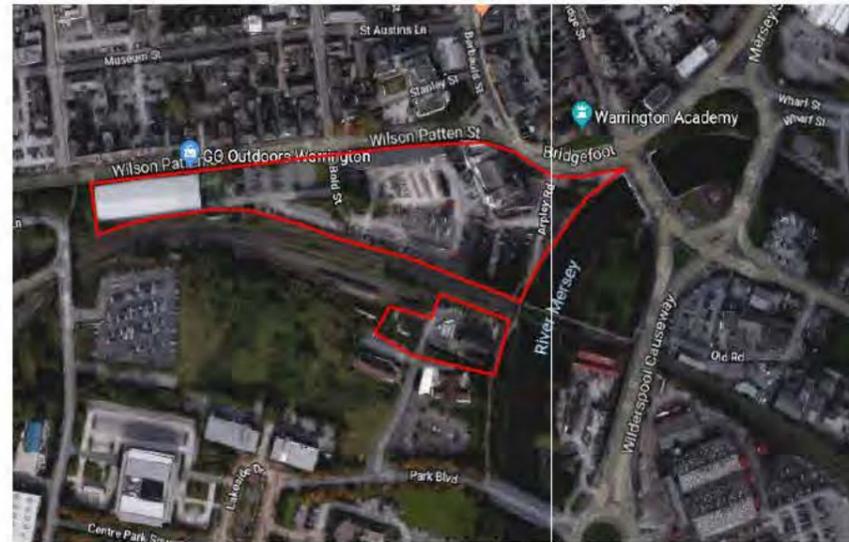
### Arpley Road

The area is located on the southern side of Wilson Road and to the north of the railway line (with the exception of one parcel on the opposite side of the track) much of the rear identified has a riverside frontage.

There are large scale operational uses on the site with associated car parking.

There is no planning history for residential use so this parcel is not considered 'deliverable'.

This parcel is included in the SHLAA which has identified a capacity of 300 dwellings during 6-15 years, although the site is not being promoted by the landowner. Nevertheless, there is a reasonable prospect it will be available and could be viably developed.



Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018						PEGASUS ASSESSMENT						PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY									
	Parcel Area	% of Site for Residential as Assumed by	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Council	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)	
<b>Arpley Road</b>																															
J1	1.1	90%	0.99	0.89	55	190	0	0	245	2672	Yes	No	300	0	82	218	0	300	Yes	CCP Car park, landscaped space	3	2017/30394 - Decision issued 07/06/2017. Request for an EIA Screening Opinion (including 126 apartments) 2017/31429 - retrospective planning application for the use of the former nightclub building footprint as a temporary car park and associated car park infrastructure permission granted 12/12/17	There is a screening option relating to 126 apartments although no residential consents on this site. This parcel has been included in the SHLAA which has identified a wider capacity of 300 dwellings during 6-15 years, although the site is not being promoted by the landowner, is in active use as a car park and has multiple land titles. We have therefore applied a development risk ratio of 50%.	0	55	190	0	245	50%	123	
J2	0.42	90%	0.38	0.34	0	94	0	0	94										Yes	B8/storage yard	1		There is no residential planning history for this site. These parcels have been included in the SHLAA which has identified a wider capacity of 300 dwellings during 6-15 years, although the site is not being promoted by the landowner and these parcels are currently in active use by commercial operations. We have therefore applied a development risk ratio of 25%. We have adjusted the high density dwellings to 130 dph in line with draft Policy TC1 and SHLAA 2018 (pages 16 and 17 and Appendix 4).	0	94	0	0	94	25%	24	
J3	0.81	100%	0.81	0.73	0	55	145	0	200										Yes	Tyre depo	1			0	55	145	0	200	25%	50	
J4	0.55	100%	0.55	0.50	0	0	0	136	136										Yes	Go Outdoors Car Park	1			0	0	0	136	136	25%	34	
J5	0.48	90%	0.43	0.39	0	0	0	107	107										Yes	Go Outdoors	1			0	0	0	107	107	25%	27	
<b>Total</b>					<b>55</b>	<b>339</b>	<b>145</b>	<b>243</b>	<b>782</b>				<b>300</b>	<b>0</b>	<b>82</b>	<b>218</b>	<b>0</b>	<b>300</b>						<b>0</b>	<b>204</b>	<b>335</b>	<b>243</b>	<b>782</b>		<b>257</b>	

**Warrington Waterfront Development Area**

The plan allocates the WWDA as a new urban quarter to deliver around 2,000 new homes and a major employment area, incorporating an enlarged multi-modal port facility and a business hub.

The WWDA area is centred around much of the Mersey River meander. This area has previously contained industrial uses and is well connected to the city centre. Many of the parcels identified have waterside boarders.

Given the planning history and inclusion of some parcels within the SHLAA there is a reasonable prospect that these parcels will be available and could be viably developed.



Parcel Reference	AREAS APPLIED BY COUNCIL				COUNCIL HOUSING TRAJECTORY					SHLAA 2018					PEGASUS ASSESSMENT										PEGASUS DISCOUNT FOR NON-DELIVERY / UNCERTAINTY						
	Parcel Area	% of Site for Residential as Assumed by	Gross Area Assumed for Residential	Net Area Assumed for Residential	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Reference	Active Use	Promoted by Council	Dwelling capacity	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Active Use(s)	Current Use	Land Titles	Planning History	Comments	0-5 Years	6-10 Years	11-15 Years	16-20 Years	Total	Delivery Prospect Ratio %	Discount (No)	
<b>Waterfront</b>																															
K5a	4.31	100%	4.31	3.88	0	275	105	0	380	-	-	-	0	0	0	0	0	0	0	No	Low grade greenfield, previously used as a landing stage	2	2018/33236 - EIA screening opinion - proposed for construction of 1628 residential units.	Given the planning history and inclusion of some parcels within the SHLAA there is a reasonable prospect that these parcels will be available and could be viably developed.	0	275	105	0	380	100%	380
K5b	7.19	100%	7.19	6.47	0	275	105	0	380	-	-	-	0	0	0	0	0	0	0	No	Low grade greenfield	2			0	275	105	0	380	100%	380
K5c	2.25	100%	2.25	2.03	0	0	275	107	382	-	-	-	0	0	0	0	0	0	0	No	Low grade greenfield	2			0	0	275	107	382	100%	382
K7a	8.63	100%	Not calculated - taken from ASTU Site		0	275	200	0	475	1541	Yes	Yes	646	0	0	192	454	646	No	Unoccupied land	1	2018/31890 - EIA scoping opinion for proposed		0	275	200	0	475	100%	475	
K7b	8.66	100%	Not calculated - taken from ASTU Site		0	275	0	0	275										No	Unoccupied land	1			0	275	0	0	275	100%	275	
K9a	4.32	100%	4.32	3.89	184	0	0	0	184	1715	No	Yes	510	82	275	153	0	510	Yes	Polyflex Packaging (B8)	1			184	0	0	0	184	100%	184	
K9b	4.81	100%	4.81	4.33	184	0	0	0	184										Yes	Polyflex Packaging (B8)	1			184	0	0	0	184	100%	184	

K10	4.38	100%	4.38	3.94	162	0	0	0	162									Yes	Driving range	1	development of around 510 dwellings. Scoping issued 24/01/2018.		162	0	0	0	162	100%	162		
K19	0.59	100%	0.59	0.53	27	0	0	0	27	-	-	-	0	0	0	0	0	0	Yes	Car parking and car yard	19			27	0	0	0	27	0%	0	
K20	0.78	100%	0.78	0.70	35	0	0	0	35	-	-	-	0	0	0	0	0	0	Yes	Jewson	1			35	0	0	0	35	0%	0	
K23	1.71	75%	1.28	1.15	0	0	58	0	58	-	-	-	0	0	0	0	0	0	Yes	Iceland supermarket, Jehovah's Witness Church	4	2018/32785 - application for a change of use from B1 office to D1 non-residential institutions providing midwifery advice and associated activities. Approved with conditions 24/07/18	There is no planning history for residential use so this parcel is not considered 'deliverable'. They are also in multiple ownerships, in active use by commercial operators and not included in the SHLAA. We have applied a 0% delivery ratio.	0	0	58	0	58	0%	0	
K26	1.64	75%	1.23	1.11	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Largely undeveloped land with the exception of the car park. It is expected that the dwellings will be built around the existing uses.	2				0	0	0	0	0	0%	0
K27	0.92	75%	0.69	0.62	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	E2/B8, established ground engineering company	2				0	0	0	0	0	0%	0
K28	0.58	75%	0.44	0.39	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Premier Inn Hotel	1	2017/30572 - Full planning for extension to an existing public house approved with conditions 01/08/17			0	0	0	0	0	0%	0
K29	0.43	75%	0.32	0.29	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Village Hotel	1				0	0	0	0	0	0%	0
K30	0.36	75%	0.27	0.24	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes		2				0	0	0	0	0	0%	0
K31	0.88	75%	0.66	0.59	0	0	0	0	0	-	-	-	0	0	0	0	0	0	Yes	Car park	1				0	0	0	0	0	0%	0
<b>Total</b>					<b>592</b>	<b>1100</b>	<b>743</b>	<b>107</b>	<b>2542</b>				<b>1156</b>	<b>82</b>	<b>275</b>	<b>345</b>	<b>454</b>	<b>1156</b>							<b>592</b>	<b>1100</b>	<b>743</b>	<b>107</b>	<b>2542</b>		<b>2422</b>

APPENDIX 5 – **KNOWSLEY LOCAL PLAN INSPECTOR'S** - ASSESSMENT OF LAND AVAILABILITY

## **INSPECTOR'S PRELIMINARY ASSESSMENT OF LAND AVAILABILITY**

**Important Note:** This is a preliminary assessment following a brief consideration of the evidence and is designed to assist the Council as to my initial thinking. I am happy to discuss my approach with all parties at a future hearing session and consequently **the final assessment may change.**

All references are to Housing Position Statement, SD22

### All Sites Under Construction

No discount, programme as stated by the Council

### Sites with Planning permission (Appendix G), programme as stated by the Council

Sites owned by Registered Provider: No change

North Huyton mixed ownership: No change

Private ownership, Full planning permission:

Viable:	No discount
Marginal	20% discount
Unviable	33% discount

Private ownership, Outline planning permission (or change of use):

Viable:	20% discount
Marginal	33% discount
Unviable	50% discount

### UDP Allocations (Appendix H)

Tower Hill, Kirkby      Await information on Phase 1 land release requirements

Bridgefield Forum      Await information on Phase 1 land release requirements  
Reduce capacity to exclude Flood Zone 3

Trecastle Rd Kirkby      Assume Category 3 site (see below)

Kirkby stadium      Assume Category 1A site (see below)

Boundary Dr Halewood      Assume planning application is granted, therefore 33% discount for Unviable site

### SHLAA Sites (Appendix J)

CATEGORY 1:      Deliverable Sites (commence within 1-5 years, programme as stated by Council) subject to 20% discount

KO073  
KO295  
KO339  
KO346  
KO382  
KO389  
KO394  
KO420  
KO440  
KO447  
KO452

KO422 is now Under Construction so no discount is necessary

CATEGORY 1A: Viable Council-owned large sites for disposal in 2015/16. Deliverable subject to 20% discount, but only count yield from year 2017/18 onwards

KO201  
KO371  
KO379  
KO391  
KO396

CATEGORY 2: Viable sites likely to commence within 6-10 years, programme as stated by Council. Developable subject to 20% discount.

KO030  
KO206  
KO212  
KO213  
KO227  
KO228  
KO365  
KO372

CATEGORY 3: **All other sites not specifically listed** (mainly Marginal viability). Include for commencement from years 6-10 onwards but subject to 50% discount.

CATEGORY 4: Sites classified as Unviable/Marginal. Include for commencement from years 6-10 onwards but subject to 66% discount.

KO034  
KO037  
KO042  
KO043  
KO053  
KO055  
KO061

KO062  
KO063  
KO065  
KO076  
KO088  
KO096  
KO106  
KO108  
KO175  
KO224  
KO225  
KO226  
KO259  
KO313  
KO381  
KO403  
KO423  
KO424  
KO425  
KO427  
KO429  
KO451  
KO456  
KO458  
KO459



INSPECTOR  
11 November 2013

APPENDIX 6 – RETAIL & TOWN CENTRE USE ASSESSMENT



# RETAIL & TOWN CENTRE USE ASSESSMENT

## WARRINGTON GARDEN SUBURB

### TAYLOR WIMPEY

Date: June 2019

Pegasus Reference: ST/P16-1405/R002v2

## Pegasus Group

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**PLANNING** | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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## 1. EXECUTIVE SUMMARY

### Overview

- 1.1 This Retail & Town Centre Use Assessment has been prepared on behalf of Taylor Wimpey regarding **Warrington Borough Council's proposals to deliver a new Garden Suburb to the southeast of Warrington**. Pegasus Group have been instructed by Taylor Wimpey to advise on their land holdings near Grappenhall, which fall within the Garden Suburb area.
- 1.2 **The Council's proposals** for the new Garden Suburb are set out at draft *Policy MD2 – Warrington Garden Suburb* of the Regulation 19 Proposed Submission Version of the Local Plan (**'the draft plan'**). It identifies the delivery of around 5,100 homes in the plan period up to 2037, with a potential for a further 2,300 homes beyond the plan period. A new 'Neighbourhood Centre' is intended to serve the whole Garden Suburb and will include a supermarket and other local shops and services and is also proposed to include other facilities.
- 1.3 **The Warrington Garden Suburb Development Framework ('the development framework')**, prepared by Aecom and dated March 2019, was published at the same time as the draft plan and provides more detail on the masterplan for the Garden Suburb. The masterplan illustrates that some of the Taylor Wimpey land will be used to deliver the **'Neighbourhood Centre'**.
- 1.4 **The Warrington Retail and Leisure Study Update ('the 2019 Nexus Study')**, prepared by Nexus and dated March 2019, identifies the need for future retail development, primarily to support growth in the proposed urban extensions in Warrington.
- 1.5 Neither the draft plan, development framework or 2019 Nexus Study set the scale of floorspace that should be delivered within the **'Neighbourhood Centre'**. Pegasus Group are therefore instructed to advise on delivery implications for the **'Neighbourhood Centre'** including the capacity for new retail and leisure floorspace in terms of quantitative needs as well as the qualitative case for additional facilities of this nature in this location.
- 1.6 This assessment has been prepared on the basis of the delivery of the proposed number of houses within the complete Garden Suburb as set out in draft Policy MD2. Taylor Wimpey take no issue with the proposed number of houses within the Garden Suburb, but we reserve the right to re-assess the suitable scale of retail and leisure development within the **'Neighbourhood Centre'** should there be any subsequent changes in this regard.

### Quantitative Assessment

- 1.7 We have identified in this assessment that once complete the new residents of the Garden Suburb will generate a total retail and leisure expenditure of £169m broken down as follows:
- £47.6m convenience goods expenditure;
  - £75.1m comparison goods expenditure;

- £30.1m retail services expenditure (A1 and A2); and,
- £15.9m leisure services expenditure (A3 and A4).

1.8 We have also identified that the existing villages in the Garden Suburb area are poorly provided for in terms of convenience goods and retail services provision and would benefit from the proposed **'Neighbourhood Centre'**. When taking the population of the existing villages into account the retail and leisure expenditure within the Garden Suburb area is £236m once the Garden Suburb is complete.

#### Qualitative Assessment

1.9 The assessment sets out the qualitative case for additional retail and leisure uses to be provided within the Garden Suburb on the basis of:

- Providing a sustainable and equitable geographical distribution of centres in the southern area of Warrington to serve the new residents residing in the Garden Suburb;
- Reducing the need for existing and new residents to travel north of the Ship Canal over crossing points that experience congestion;
- Providing some of the existing villages within the Garden Suburb with some localised retail provision to encourage walking for day to day items;
- Relieving some of the overtrading trading pressures experienced at the existing Morrisons and Aldi supermarkets in Stockton Heath; and
- Introducing some additional choice and competition in terms of main food shopping in the southern part of Warrington.

#### Suitable Scale and Turnover of **the 'Neighbourhood Centre'**

1.10 The assessment goes on to identify a suitable scale and turnover of the proposed **'Neighbourhood Centre'** based on the capacity for convenience goods from the Garden Suburb and the existing villages within area, so that it does not adversely impact on the existing nearby centres, and so that the centre is broadly consistent with the range of uses found within comparable centres elsewhere in Warrington and is reflective of the general retail market.

1.11 The assessment identifies that the **'Neighbourhood Centre'** could accommodate a 2,800 sq m net main food supermarket, a 900 sq m net discounter supermarket, 1,000 sq m net of comparison goods retailing floorspace and 1,000 sq m net of retail service and leisure goods floorspace. In this regard it is considered that the **'Neighbourhood Centre'** could function as a District Centre without any undue impact on the vitality or viability of nearby centres.

1.12 The convenience goods turnover of the **'Neighbourhood Centre'** is calculated at £33.0m and the other turnover generated is £19.2m.

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## Market Share

- 1.13 The '**Neighbourhood Centre**' would represent 70% of the total convenience goods expenditure generated by the Garden Suburb once complete. This figure is reduced to 49% when also considering the expenditure of the existing villages within the Garden Suburb area. In the context of the entire South Warrington area, it would represent just 27% of the available convenience goods expenditure, and just 22% if Lymm's existing expenditure is included too (and not accounting for any residential development in Lymm). In short, the '**Neighbourhood Centre**' would only need to capture approximately a quarter of the available convenience goods market share in the entire South Warrington conurbation based on the above suggested scale and format of development.
- 1.14 The '**Neighbourhood Centre**' would represent 8.4% of the total comparison goods expenditure once the Garden Suburb is complete. This figure is reduced to 6.0% when also considering the expenditure of the existing villages within the Garden Suburb area, broadly in keeping with the existing market and shopping patterns within the South Warrington area.

## Recommendations

- 1.15 In the separate representation Taylor Wimpey object to *Policy DEV5 – Retail and Leisure Needs* on the basis that the terms used within the retail hierarchy are not consistent with national planning policy. In short, Neighbourhood Centres sit below Local Centres and as such the Neighbourhood Centres should be renamed Local Centres and visa versa. Policy DEV5 goes on to identify the new '**Neighbourhood Centre**' and three '**Local Centres**' within the Garden Suburb. This terminology is followed through into Policy MD2.
- 1.16 It is set out in this Retail & Town Centre Use Assessment **that the envisaged 'Neighbourhood Centre'** within the Garden Suburb actually has the scope to be a District Centre without generating any undue adverse impacts on existing centres within Warrington. Equally, we recognise that the scale of the centre and its associated retail and main town centre use provision will also be strongly influenced by market demand and that may result in the delivery of a Local Centre.
- 1.17 We therefore recommend that the '**Neighbourhood Centre**' within the Garden Suburb be renamed a District/Local Centre **and the 'Local Centres' renamed Neighbourhood Centres/hubs in both Policy DEV5 and MD2.**
- 1.18 In addition, the NPPF makes clear that the objectively assessed needs for all development need to be considered in preparing a new local plan and that strategic policies should set out any overall strategy for the scale of retail development.
- 1.19 The Nexus 2019 Study does not set a clear framework for the suitable scale of development within the '**Neighbourhood Centre**'. We expect the local plan to be supported by evidence that sets out the need for town centre uses within the Garden Suburb area in quantitative and qualitative need

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terms, whilst recognising that the retail and leisure market is very dynamic and subject to ongoing changes.

1.20 Policy MD2 sets out the general requirement for a '**Neighbourhood Centre**' to serve the whole of the Garden Suburb but also fails to set a suitable scale of retail and leisure development. The requirement to demonstrate retail need would be necessary if a larger quantum of development is proposed.

1.21 In this regard, based on the findings of this Retail & Town Centre Use Assessment and in line with the comments made to Policy DEV5, we recommend that Part 5f of the Policy MD2 is amended to:

*'A centrally located District/Local Neighbourhood Centre comprising a supermarket, local shops, 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.**'*

---

## 2. INTRODUCTION

2.1 This Retail & Town Centre Use Assessment has been prepared on behalf of Taylor Wimpey with regard to Warrington Borough Council's proposals to deliver a new Garden Suburb to the southeast of Warrington. The Council's intention for the Garden Suburb is to deliver:

- Significant new residential homes, including affordable housing (circa 7,400 units);
- A new 'Neighbourhood Centre';
- New 'Local Centre' facilities;
- A new secondary school and 4x primary schools;
- New community facilities including medical centre, sports hall/leisure centre and recreational playing pitches;
- A country park;
- 116 ha of strategic employment land;

2.2 Pegasus Group have been instructed by Taylor Wimpey to advise on their land holdings near Grappenhall, which fall within the Garden Suburb area. The masterplan prepared by the Council illustrate that some of this land will be used to deliver the 'Neighbourhood Centre'. We summarise Taylor Wimpey's interests and the draft proposals in more detail in Section 3.

2.3 Pegasus Group are therefore instructed to advise on delivery implications for a District/Local Centre, including the capacity for new retail and town centre use floorspace in terms of quantitative needs as well as the qualitative case for additional facilities of this nature in this location. This is a requirement set out in the National Planning Policy Framework, which we comment on in Section 4, as well as introduce any existing and relevant evidence prepared by the Council.

2.4 In terms of qualitative need issues, it is also important to consider if the end user will have sufficient and appropriate uses to serve their day to day and weekly needs. In this regard, it is important to consider a) the location of existing facilities and their current trading performance, b) the ability for those existing services to sustainably cater for the new planned residential homes and associated population; and c) should there be a clear need for new facilities, where would they be best located to ensure sustainable travel patterns and an equitable geographic spread of facilities. We address this in more detail in Section 5.

2.5 In terms of quantitative need issues, there is no doubt that the delivery of a significant number of new homes in the Garden Suburb will deliver additional household and retail expenditure to the South Warrington area. This can be quantified and converted to notional floorspace requirements, which we address in detail in Section 6.

- 
- 2.6 We go on to consider the impact of a number of development scenarios to determine what level of floorspace should be provided in the District/Local Centre during certain phases of the planned Garden Suburb, what format and scale it should take, and at what point it should be delivered. Different scenarios are presented for the different phases of development and to consider alternative options for the Garden Suburb. For instance, if no additional provision is provided within the Garden Suburb, we explore what impact this would have on existing facilities. Indeed, this option could place an undue burden on existing facilities within the vicinity if there is already evidence of these services overtrading. Alternatively, if some but too little new town centre use floorspace is provided within the Garden Suburb, this could equally begin to overtrade very quickly and not deliver a suitable customer experience. Conversely, if too much town centre floorspace is provided, this could adversely impact on existing nearby centres. We address all of the above in Section 7.
- 2.7 We go on to set out our recommendations for the District/Local Centre and what implications this has on the concept and phasing for the Garden Suburb in Section 8.
- 2.8 Pegasus Group are well positioned to advise on such matters. Sebastian Tibenham (Executive Director) has spent his professional career advising Tesco, ASDA, Co-op and other retail operators and developers on their growth and estate management strategies. In doing so, he has prepared numerous retail capacity and impact assessments. He is also advising his business on a wide range of Sustainable Urban Extensions and their ability to deliver new town centre uses and dedicated centres to service these newly planned communities.

### 3. TAYLOR WIMPEY'S LAND INTEREST & THE GARDEN SUBURB PROPSALS

3.1 Within this section we summarise relevant information relating to:

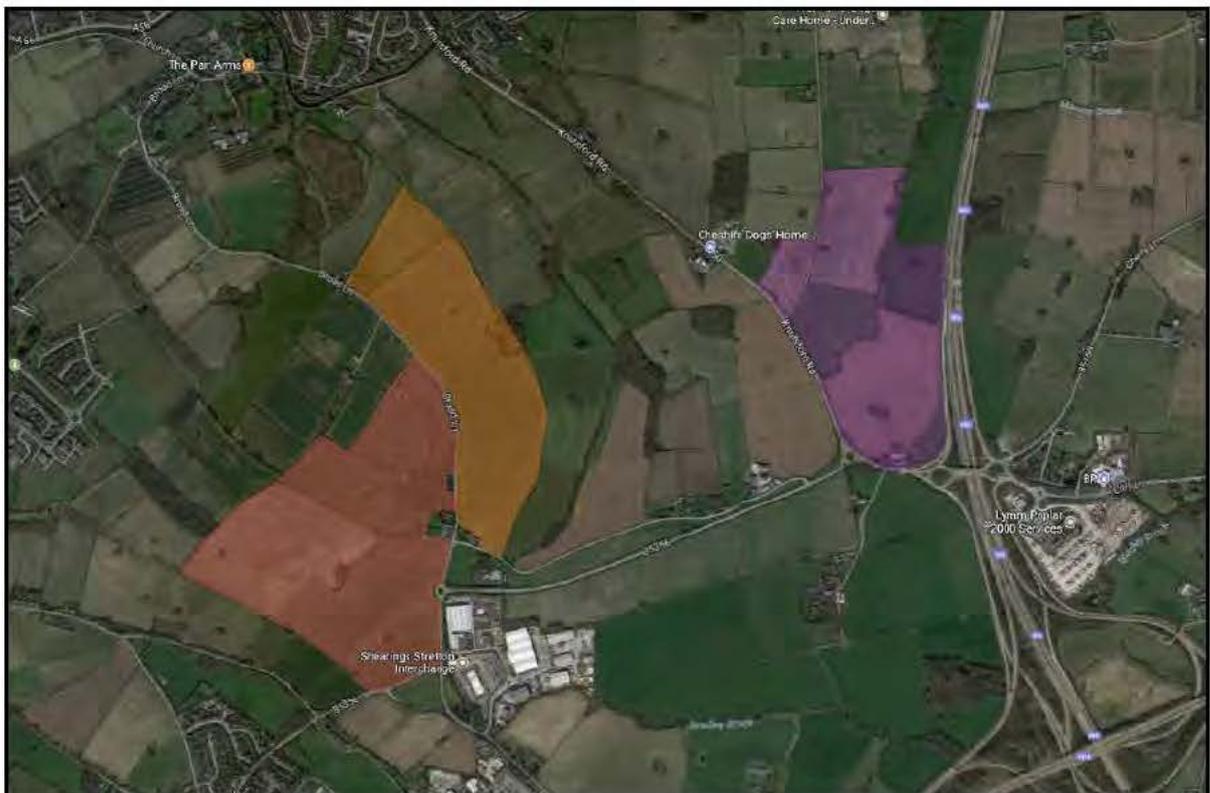
- Taylor Wimpey's land interests within Warrington and around the Grappenhall area;
- The adopted Warrington Core Strategy, July 2014;
- The Warrington Garden Suburb Development Framework, March 2019; and,
- The draft plan position including the proposals for the Garden Suburb.

#### **Taylor Wimpey's Land Interests**

3.2 Taylor Wimpey have an option on three separate parcels of land contained within the emerging Garden Suburb area. All are within the same ownership and are illustrated on Figure 1.1 below:

- The Red Parcel – West of Broad Lane is approximately 118 acres (47.75 ha);
- The Orange Parcel – East of Broad Lane is approximately 77 acres (31.16 ha); and,
- The Purple Parcel – North of Cliff Lane is approximately 93 acres (37.63 ha).

**Figure 2.1 – Taylor Wimpey's Promotion**



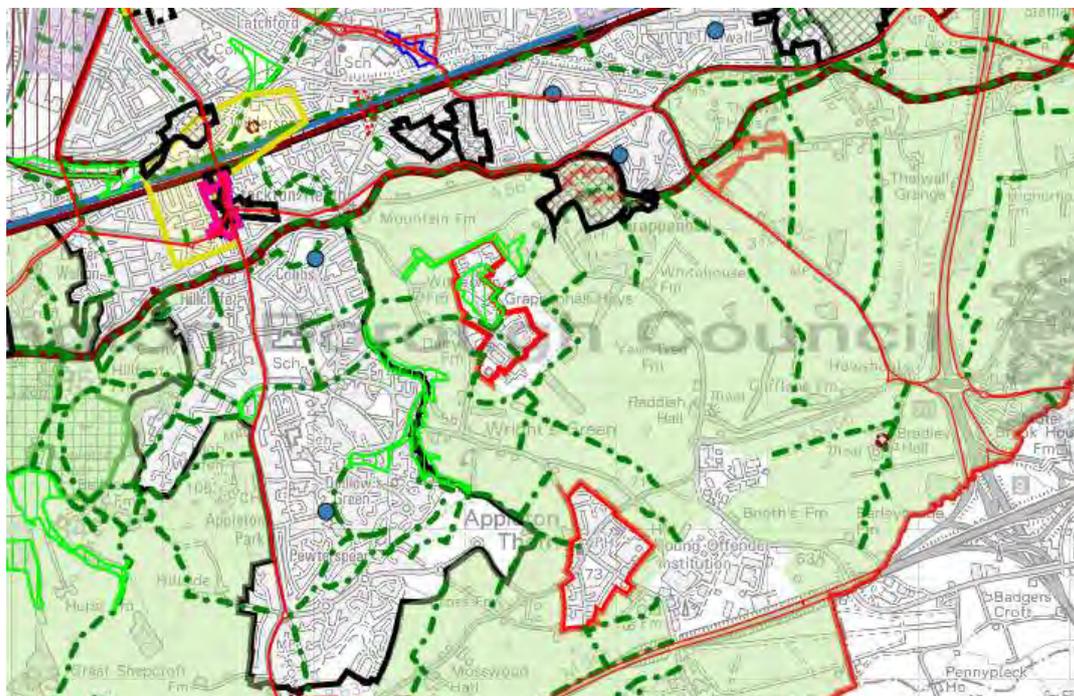
3.3 It is relevant to highlight at this stage that a part of the red parcel is identified as forming the District/Local Centre for the Garden Suburb, whilst part of the purple parcel is identified for employment, within the draft plan and development framework.

#### Warrington Core Strategy

3.4 The Warrington Core Strategy was adopted in July 2014 following a successful challenge in the High Court in relation to its housing policies. As such, it does not include any housing targets or new housing allocations. This is clearly a major omission, hence why a new Local Plan is underway.

3.5 **Taylor Wimpey's land** interests are all currently defined as Green Belt, along with the majority of land being promoted as part of the Garden Suburb.

*Figure 2.2 – Local Plan Core Strategy Policies Map Extract*



3.6 It is also relevant to note the existing villages of Appleton Thorne and Grappenhall, which are inset within the Green Belt which are demarked red outline shapes, along with the Barley Castle Trading Estate. The white non-Green Belt land to the east of Grappenhall was formerly allocated for housing in the 2006 Unitary Development Plan. The villages of Stretton, Weaste Lane and Grappenhall Heys are currently washed over by Green Belt.

3.7 Stockton Heath District Centre is shown to the north west but south of the ship canal and is demarked pink outline whilst Latchford Local Centre is to the north of the ship canal and demarked blue outline. The blue dots represent smaller Local Centres at Lindi Avenue, Dudlows Green, Knutsford Road, Barley Road and Bridge Lane.

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Regulation 19 Proposed Submission Version Local Plan 2019

*Overview*

- 3.8 Given the number and nature of representations made during the Regulation 18 consultation, the Council carried out a review of the technical evidence base and options assessment that underpin the draft plan. The Council has also updated its evidence base relating to housing, employment and retail needs.
- 3.9 The Council has assessed the option of a lower level of growth and considered additional spatial development options looking at the potential of sites in north Warrington and options with lower levels of development in South Warrington. The Council has also reviewed its density assumptions to promote higher density residential development in the town centre and surrounding area.
- 3.10 The proposed plan period extends from 2017 to 2037 and it will replace the Core Strategy (2014) in its entirety.
- 3.11 **In determining Warrington’s housing requirement, the Council has followed the Government’s Standard Methodology and associated Planning Policy Guidance.**
- 3.12 The plan proposes a minimum housing requirement of 945 homes per annum compared to the 1,113 per annum proposed in the Regulation 18 consultation document. This housing requirement **is around 4% above the minimum housing requirement under the Government’s Standard Housing Methodology** (using the 2014 based household projections).
- 3.13 **The Council’s updated Economic Development Needs Assessment has re-confirmed** the scale of employment land that the Council needs to plan for. The plan makes provision to meet the full requirement of 362 ha of employment land.
- 3.14 The Nexus 2019 Study identifies the need for only a modest increase in the need for future retail development, primarily to support growth in the proposed urban extensions. It also stresses the threat to Warrington Town Centre of any additional out-of-centre retail development.

*Policy DEV5 – Retail and Leisure Needs*

- 3.15 Policy DEV5 sets the retail hierarchy within the Borough as:
- Town Centre
  - District Centres
  - Neighbourhood Centres
  - Local Centres
  - Neighbourhood Hubs

- 3.16 In the separate representation Taylor Wimpey object to Policy DEV5 on the basis that the terms used within the retail hierarchy are not consistent with national planning policy. In short, Neighbourhood Centres sit below Local Centres and as such the Neighbourhood Centres should be renamed Local Centres and visa versa.
- 3.17 Policy DEV5 goes on to identify the new 'Neighbourhood Centre' and three 'Local Centres' within the Garden Suburb. It is set out below that the **centre at the envisaged 'Neighbourhood Centre'** within the Garden Suburb actually has the scope to be a District Centre without generating any undue adverse impacts on existing centres within Warrington. This is by virtue of:
- The existing expenditure and retail capacity generated within the catchment area located to the south of the Manchester Ship Canal,
  - The extent of evident overtrading in existing retail facilities within the catchment area,
  - The level of new expenditure that will be generated by the Garden Suburb proposals and general growth within the area; and
  - The limited geographical distribution of existing centres located to the south of Warrington. Indeed, there are no major supermarkets located to the south of the Ship Canal.
- 3.18 Equally, we recognise that the scale of the centre and its associated retail and main town centre use provision will also be strongly influenced by market demand and that may result in the delivery of a Local Centre. Either way we are firmly of the view that the main centre within the Garden Suburb should be listed **as a District/Local Centre, and not 'Neighbourhood Centre'**. Likewise, the **'Local Centres' should be renamed Neighbourhood Centres/hubs.**

*Policy MD2 – Warrington Garden Suburb*

- 3.19 The policy identifies the Garden Suburb to the south east of the main urban area, which will deliver around 5,100 homes (including 4,200 through Green Belt release) in the plan period up to 2037, with a potential for a further 2,300 homes from Green Belt release beyond the plan period. It will also be a major new employment location of 116 ha at the junction of the M6 and M56.
- 3.20 In the sperate representation Taylor Wimpey support Policy MD2 although object to the unreasonable length, repetitiveness and lack of consistency with other parts and policies contained within the Local Plan and suggest alternative wording that is more succinct and accurate.
- 3.21 The proposed new residential and working community of the Garden Suburb is intended to 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; and,
- Extensive highways and public transport improvements.

3.22 The Garden Suburb is also proposed to 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 village at the eastern end of the Garden Suburb adjacent to the A50. New homes are proposed to be delivered in the Garden Suburb across the following locations:

- Grappenhall Heys – approximately 2,800 homes (2,100 within the plan period)
- Appleton Cross / Pewterspear – approximately 2,100 homes (1,500 within the plan period)
- New Garden Village adjacent to A50 – approximately 1,800 homes (1,000 within the plan period)
- **Garden Suburb 'Neighbourhood Centre'** – approximately 700 homes (500 within the plan period)

3.23 It is proposed that a minimum of 30% of homes should be affordable.

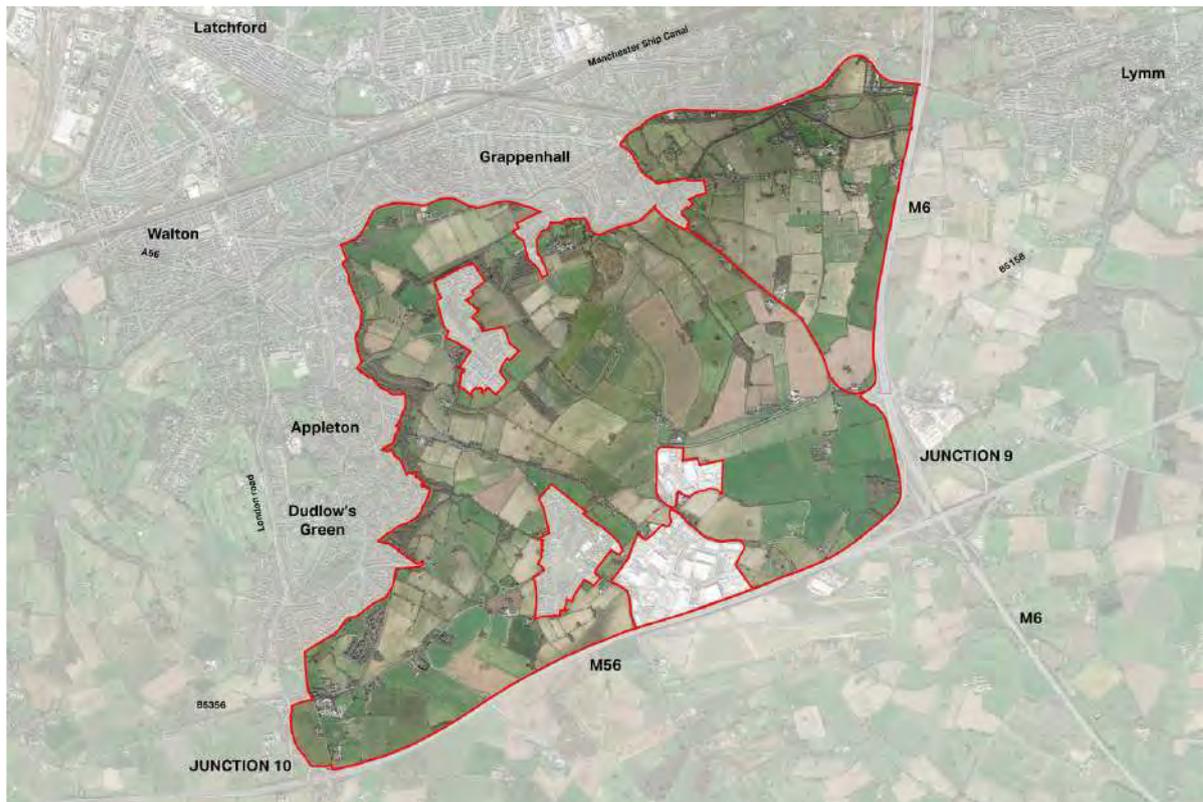
3.24 **The new 'Neighbourhood Centre' will be centrally located and provide higher level services for the Garden Suburb as a whole. The 'Neighbourhood Centre' is proposed to include a new secondary school, a combined health and leisure centre, sports pitches, a supermarket and other local shops and services. The plan says that 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. However, based on the findings of this Retail & Town Centre Use Assessment the centre could accommodate up to 5,000 sqm of retail floorspace without any undue impact.**

3.25 **The new 'Local Centres' will provide focal points for the proposed villages and are proposed to be centrally located within these areas. The plan says that 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'. Any proposal for additional retail floorspace will require a retail needs assessment and be subject to the sequential assessment.**

3.26 The Garden Suburb is proposed to provide a major new Employment Area as an extension of the existing Appleton Thorn/Barley Castle Trading Estate to include large scale distribution, logistics, industrial uses and offices.

#### Warrington Garden Suburb Development Framework

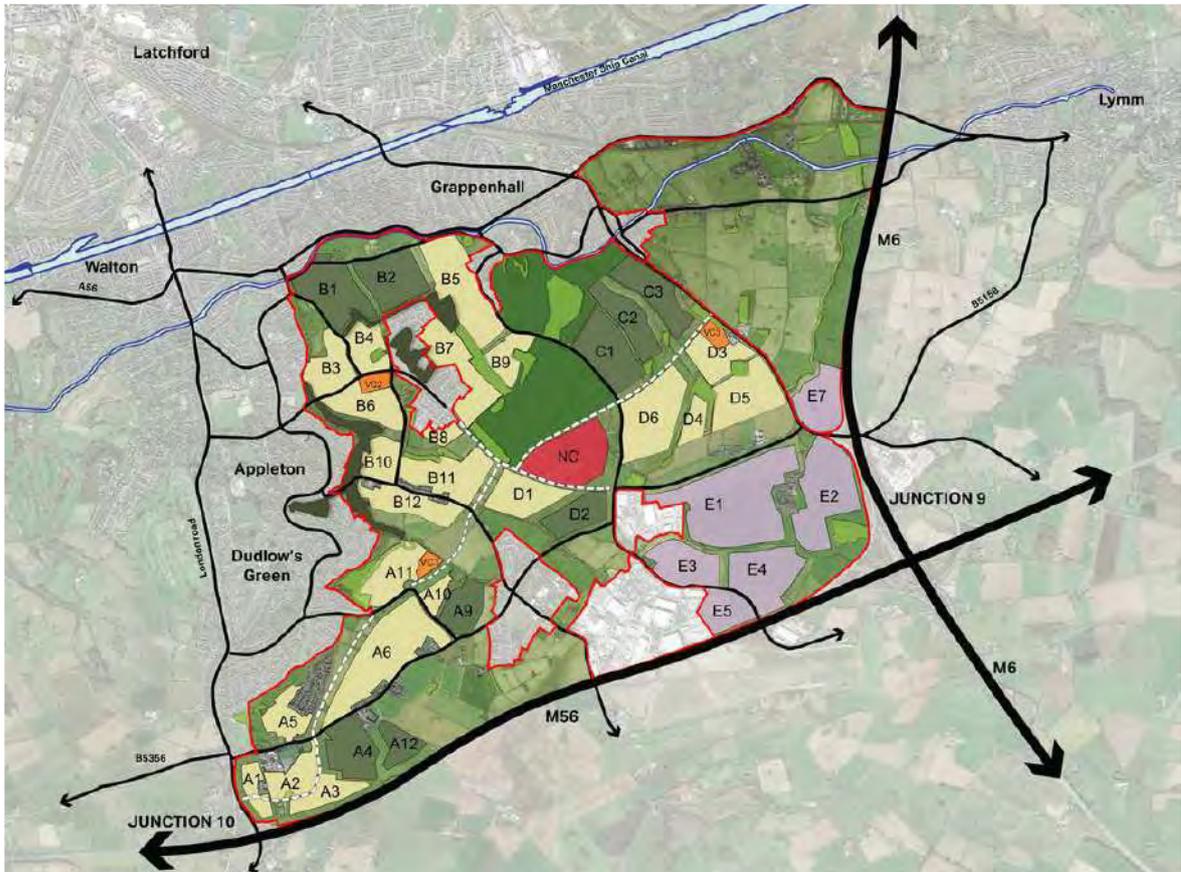
3.27 This document was published at the same time as the Proposed Submission Version of the plan and provides more detail on the masterplan for the Garden Suburb. The site boundary is shown in more detail in Figure 1.2 (copied below).



3.28 Figure 5.6 (copied below) sets out more detail in terms of a number of development parcels for the different land uses, with:

- The 'Neighbourhood Centre' shown in red;
- The 'Local Centres' shown in orange;
- Residential parcels expected to come forward in the plan period in yellow;
- Residential parcels expected to come forward after the plan period in green; and,
- Employment land in purple.

3.29 The development areas are cited in Table 5.1 also copied below.



Land Use for Warrington Garden Suburb

Land Use	ha	acre	Note
Neighbourhood Centre	19	46.9	
Employment Land	116	285.6	Footprint: 405,000 square metre, based on 35% of land area
Residential	351.3	868.1	
3 Village Centres	6.9	17.1	
Country Park	89	219.9	
Proposed Strategic Road	14.7	36.3	
Greenbelt and Open Countryside	621.5	1538.2	
<b>Total</b>	<b>1237.6</b>	<b>3013.2</b>	

Village Centres

Parcel	Gross Parcel Area (ha)	Gross Parcel Area (acre)
VC1	1.9	4.6
VC2	2.5	6.2
VC3	2.5	6.2
<b>Total</b>	<b>6.9</b>	<b>17.0</b>

**Warrington Garden Suburb Residential**

Area	Parcel	Gross Parcel Area (ha)	Gross Parcel Area (acre)	Potential Number of Units (Gross Density @20 dph)	Homes England Land Confirmed Unit Numbers (Planning Apps)	
A	A1	4.8	11.9	96		
	A1	8.5	21.0	170		
	A1	7.3	18.0	146		
	A1	12.7	31.4	254		
	A5	7.4	18.3		180	
	A6	29.7	73.5	595		
	A6	8.6	21.3	172		
	A10	3.3	8.1		350	
	A11	13.0	32.1			
	A12	5.9	14.7	119		
	B	B1	16.4	40.5	328	
		B1	14.6	36.1	292	
B1		10.0	24.7	200		
B4		8.0	19.8	160		
B5		21.2	52.5	425		
B6		11.3	27.9	226		
B7		15.9	39.2		400	
B8		7.8	6.9			
B9		7.0	17.3	140		
B10		7.1	17.5	142		
B11		15.4	38.0	307		
B12		11.2	27.7	224		
C	C1	15.9	39.2	317		
	C1	10.8	26.7	216		
	C1	12.4	30.7	249		
D	D1	8.7	21.5	174		
	D4	4.4	10.8	87		
	D5	15.0	39.5	320		
	D6	20.6	50.9	412		
<b>Total</b>		<b>330.8</b>	<b>817.3</b>	<b>5,770</b>	<b>930</b>	

**Surrounding Neighbourhood Centre Area (Higher Density Residential)**

Area	Parcel	Gross Parcel Area (ha)	Gross Parcel Area (acre)	Potential Number of Units (Gross Density @30 dph)
D	D1	11.8	29.1	353
	D2	8.7	21.6	261
<b>Total</b>		<b>20.5</b>	<b>50.7</b>	<b>614</b>

**District Centre Area (Higher Density Residential)**

Area	Parcel	Gross Parcel Area (ha)	Gross Parcel Area (acre)	Potential Number of Units (Gross Density @30 dph)
Neighbourhood Centre	NC	3.5	8.6	105

Potential Number Units INCLUDING Homes England Land: 7,420 (Phases 1-4)  
 Potential Number of Units EXCLUDING phase 2 Homes England Land: 6,490 (Phases 1-4)

**Warrington Garden Suburb Employment Area**

Area	Parcel	Gross Parcel Area (ha)	Gross Parcel Area (acre)
E	E1	40.9	101.1
	E2	23.5	58.1
	E3	12.6	31.1
	E4	17.6	43.5
	E5	8.8	21.7
	E7	12.4	30.6
	<b>Total</b>		<b>116</b>

Footprint: circa 406.00 square metre, based on 35% of land area

**Latest Plans and Phasing**

- 3.30 The draft plan identifies that 5,100 dwellings will come forward in the 20 year plan period between 2017-2037, with a further 2,300 dwellings to come forward after the plan period.
- 3.31 The development framework provides a breakdown of development achieved in each phase at Figures 7.1 to 7.4 (copied below).
- 3.32 This quantum of development has still yet to be tested at examination, but it sets a helpful framework to work for calculating the level of available retail expenditure that will be generated by new households.
- 3.33 It was noted that the spatial framework for the Garden Suburb evolved from the expansion of the existing villages, including the creation of small local village hubs to sustain those communities and a new 'Neighbourhood Centre' to serve the wider Garden Suburb development and to include retail, education and recreational uses. However, it was noted that no specific capacity or need assessment had been carried out at this stage, hence why we have prepared this assessment.

**Warrington Garden Suburb Phasing Schedule**

**PHASE 1**

Land Use	ha	acre	HE Land Confirmed Unit Numbers (Planning Apps)
Residential	42.3	104.5	930
Village Centre	4.4	10.9	
Employment	116	286.6	
<b>Total</b>	<b>162.7</b>	<b>402.0</b>	<b>930</b>

**PHASE 2**

Land Use	Gross Parcel Area (ha)	Gross Parcel Area (acre)	Potential Number of Units (Gross Density)
Residential	128.8	318.3	2,692
Neighbourhood Centre	19	46.9	105
<b>Total</b>	<b>147.8</b>	<b>365.2</b>	<b>2,797</b>

**PHASE 3**

Land Use	Gross Parcel Area (ha)	Gross Parcel Area (acre)	Potential Number of Units (Gross Density)
Residential	74.3	183.6	1,485
Village Centre	2.5	6.2	
<b>Total</b>	<b>76.8</b>	<b>189.8</b>	<b>1,485</b>

**PHASE 4**

Land Use	Gross Parcel Area (ha)	Gross Parcel Area (acre)	Potential Number of Units (Gross Density)
Residential	106	261.9	2,208
<b>Total</b>	<b>106</b>	<b>261.9</b>	<b>2,208</b>

4,282 potential units to be delivered EXCLUDING Homes England sites (Phases 1-3).

5,212 potential units to be delivered INCLUDING Homes England Sites (Phases 1-3).

Potential Number Units INCLUDING Homes England Land: 7,420 (Phases 1-4)

Potential Number of Units EXCLUDING phase 1 Homes England Land: 6,490 (Phases 1-4)

4,201 units within 20 years planning period, 81 units to be delivered on the post plan period. (Phases 1-3 EXCLUDING Homes England Sites)

5,131 units within 20 years planning period, 81 units to be delivered on the post plan period. (Phases 1-3 INCLUDING Homes England sites)

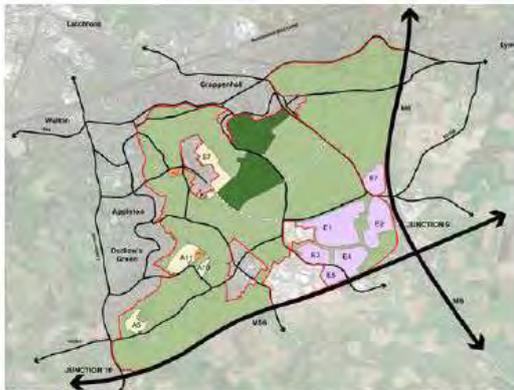


Figure 7.1: Phase 1

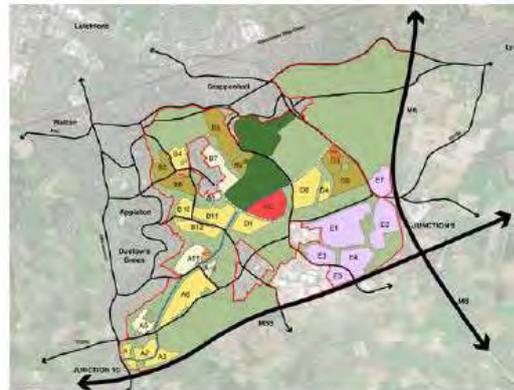


Figure 7.3: Phase 3

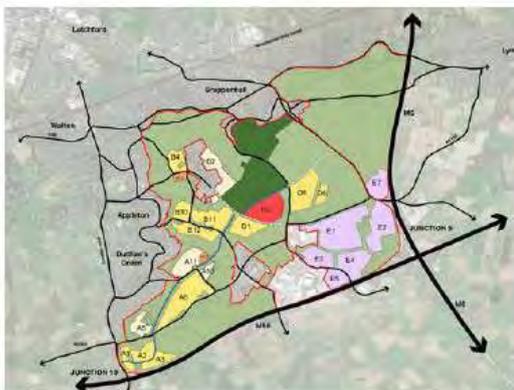


Figure 7.2: Phase 2

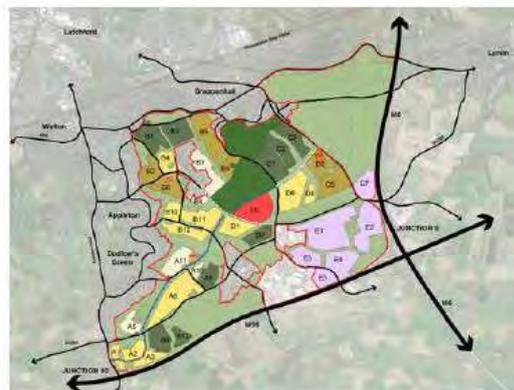


Figure 7.4: Phase 4



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#### 4. NATIONAL PLANNING POLICY REQUIREMENTS & EXISTING EVIDENCE

4.1 Within this section we summarise relevant aspects of the National Planning Policy Framework (which was recently revised in February 2019), and guidance set out online in the Planning Policy Guidance.

##### National Planning Policy Framework

4.2 The 2012 version of the NPPF set out the need for local plan evidence to specifically set out the quantitative and qualitative need for new business floorspace (including town centre uses). This paragraph is not replicated in the revised NPPF but it is still clear within the main body of the document that objectively assessed needs for all development need to be considered in preparing a new local plan.

4.3 As such, we would still expect local plans to be supported by evidence setting out what the need for town centre uses is within an area and it still makes sense to consider this in quantitative and qualitative need terms, whilst recognising that the retail and leisure market is very dynamic and subject to ongoing changes.

4.4 Paragraph 7 states the following:

*'The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.'*

4.5 Paragraph 8 defines the meaning of sustainable development as follows:

*'Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

*a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support **communities' health**, social and cultural well-being; and*

*c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve*

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*biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*

4.6 Paragraph 11 then goes on to define what is meant by the presumption in favour of sustainable development. For plan-making that means the following:

*a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*

*b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>6</sup>; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

4.7 Paragraph 20 then goes on to identify what strategic policies should contain. It confirms:

*'Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision<sup>12</sup> for:*

*a) housing (including affordable housing), employment, retail, leisure and other commercial development;*

*b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

*c) community facilities (such as health, education and cultural infrastructure); and*

*d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.'*

4.8 Under the heading 'Ensuring the vitality of town centres', Paragraph 85 of the NPPF largely focuses on the role of existing centre but it certainly does not rule out the delivery of new centres. It confirms the following:

*'Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:*

*a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes*

*in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;*

*b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;*

*c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;*

*d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;*

*e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and*

*f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.'*

4.9 Part a) requires the local authority to define a network of centres. It does not restrict this network to existing centres. Parts d) and e) also necessitate that needs are met through the allocation of sites and where these needs cannot be met in existing centres, clear policies need to be set out as to how these needs can be met. Such policies could include the delivery of new centres where there is evident need.

4.10 Paragraphs 86 to 88 sets out the longstanding sequential tests for planning applications involving town centre uses, whilst paragraphs 89 deals with the impact test for planning applications and sets the national threshold of 2,500 sq m for an impact assessment.

4.11 Finally, it is also pertinent to note the requirements of paragraphs 91 and 92 which promote the aim of healthy, inclusive and safe places to live. Paragraph 91 confirms policies should:

*'a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*

*b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and*

*c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*

4.12 Paragraph 92 confirms policies should

*a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*

*b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*

*c) guard against the unnecessary loss of valued facilities and services, particularly where this **would reduce the community's ability to meet its day-to-day needs;***

*d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and*

*e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.*

4.13 Throughout the above two paragraphs of the NPPF, shops and local services are cited as important uses to ensure communities are inclusive, safe and healthy. Indeed, the citing and scale of such facilities and their relationship to surrounding residential areas will encourage walking, cycling, and the use of public transport. The manner in which they are integrated with other uses will also promote viability and vitality and if planned well they will create a sense of place and help to establish the spirit of what makes a healthy and cohesive community.

4.14 Part e) in particular clearly highlights the need to consider the Garden Suburb and its constituent components (including the planned 'Neighbourhood Centre') in an integrated manner. To do that, it is important to understand the underlying need and the existing context, which this assessment addresses in detail.

4.15 As a final point, the NPPF introduces the Standard Methodology for housing needs to be used when preparing new local plans and setting strategic policies.

National Planning Guidance

*Housing Need Assessments*

4.16 The NPPG at Paragraph: 002 Reference ID: 2a-002-20190220 says:

*'The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need.*

*The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.*

*The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure.'*

- 4.17 The Standard Methodology local housing need figure for Warrington is 909 dwellings per annum. The Council have identified a housing requirement of 945 dwellings per annum, 4% above the local housing need<sup>1</sup>.

#### *Ensuring the Vitality of Town Centres*

- 4.18 In terms of planning for town centre uses, the NPPG has not been updated since the publication of the revised NPPF. However, it is pertinent to note the following, which is stated at the outset:

*'Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a 'town centre first' approach and taking account of specific town centre policy. In doing so, local planning authorities need to be mindful of the different rates of development in town centres compared with out of centre.'*

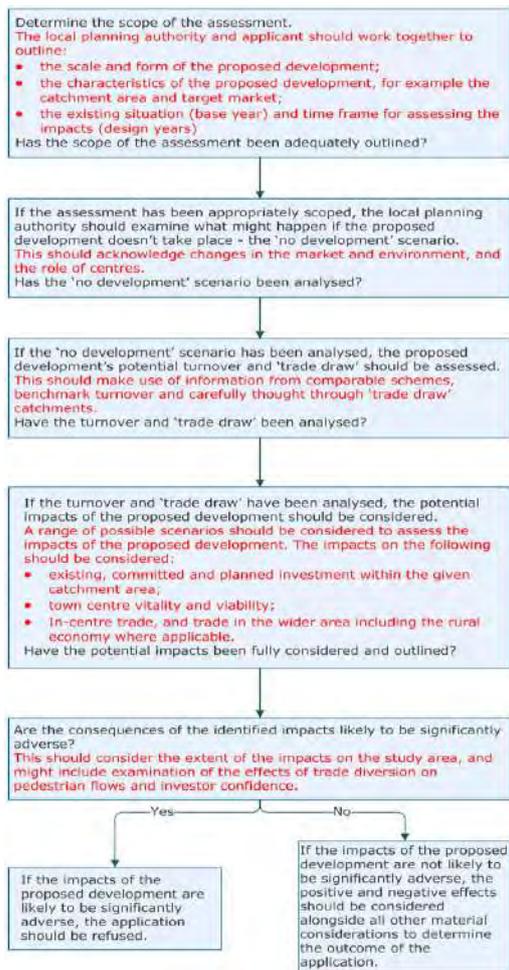
- 4.19 The NPPG goes on to **confirm that LPA's should consider setting strategies and visions for their town centres**, how to assess the health of a town centre, and how the sequential assessment should be applied at the plan-making stage. For the latter, the following checklist is provided:

- *'Has the need for main town centre uses been assessed? The assessment should consider the current situation, recent up-take of land for main town centre uses, the supply of and demand for land for main town centre uses, forecast of future need and the type of land needed for main town centre uses*
- *Can the identified need for main town centre uses land be accommodated on town centre sites? When identifying sites, the suitability, availability and viability of the site should be considered, with particular regard to the nature of the need that is to be addressed*
- *If the additional main town centre uses required cannot be accommodated in town centre sites, what are the next sequentially preferable sites that it can be accommodated on?'*

- 4.20 In considering impact, the following checklist / flow chart is provided alongside other advice:

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<sup>1</sup> Table 7, Page 20, Warrington SHMA, March 2019



## Warrington Council's Retail Evidence

4.21 The Council's Retail Assessment evidence is contained in the following documents:

- Warrington Retail and Leisure Study Update, March 2019 by Nexus;
- Warrington Retail and Leisure Study, August 2015 by WYG;
- Town Centre Health Check, 2012 by Warrington Borough Council; and
- Warrington Retail Centres Report, 2012 by Warrington Borough Council.

4.22 We have reviewed all four reports and the associated appendices and make reference to some of the data and findings within our own assessment.

4.23 The Nexus 2019 Study is the most up to date in terms of providing information on shopping patterns based on a November 2014 household survey, as well as detailed health checks for Warrington Town Centre and the three District Centres within the Borough, including Stockton Heath. We have regard to the shopping patterns set out in this document and take particular note of the trading performance of stores and centres close to the Garden Suburb.

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4.24 The 2012 Retail Centres Report provides useful information on all of the smaller retail centres including Neighbourhood and Local Centres. We have included relevant extracts at Appendix 1 in relation to the following centres:

- Latchford Neighbourhood Centre;
- Lymm Neighbourhood Centre;
- Barley Road, Thelwall Local Centre;
- Bridge Lane, Appleton Local Centre;
- Dudlows Green Road Local Centre;
- Knutsford Road, Grappenhall Local Centre; and,
- Lindi Avenue, Grappenhall Local Centre.

## 5. QUALITATIVE NEED CONSIDERATIONS

### 5.1 Within this section we address the following:

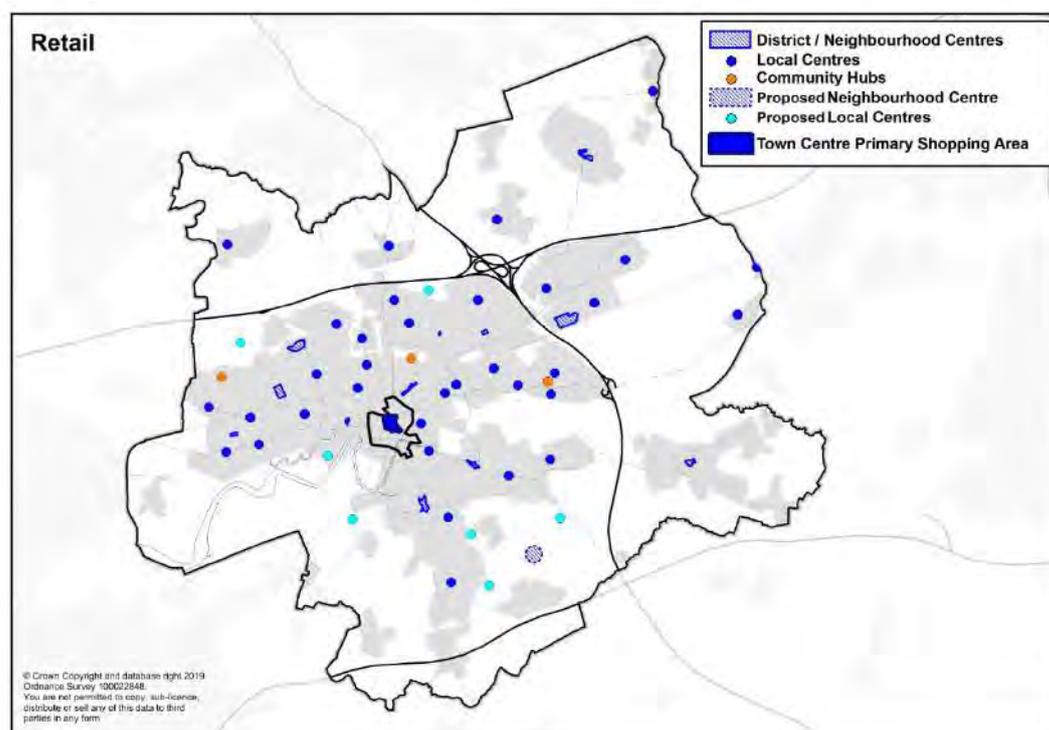
- The spatial distribution of existing retail facilities in Warrington and the surrounding area;
- The quality of the existing retail provision in the area;
- The performance of the closest retail centres and other facilities within the area;
- Identify any obvious lack of provision and the relationship to the planned Garden Suburb communities.

#### The Spatial Distribution of Existing Centres and Retail Provision

5.2 Ensuring there is an equitable distribution of retail centres around Warrington and its planned expansion will be an important component of the emerging Local Plan. As previously highlighted, this will assist in creating walkable neighbourhoods, and a sense of place and community cohesion. The appropriate distribution and scale of such facilities will also reduce the use of the private car if planned properly.

5.3 The emerging Local Plan provides a useful plan illustrating the distribution of existing and proposed retail and leisure facilities within Warrington (copied below at Figure 4.1). This generally marries with the identified centres on the Policies Map, other than Lindi Avenue Local Centre which is removed.

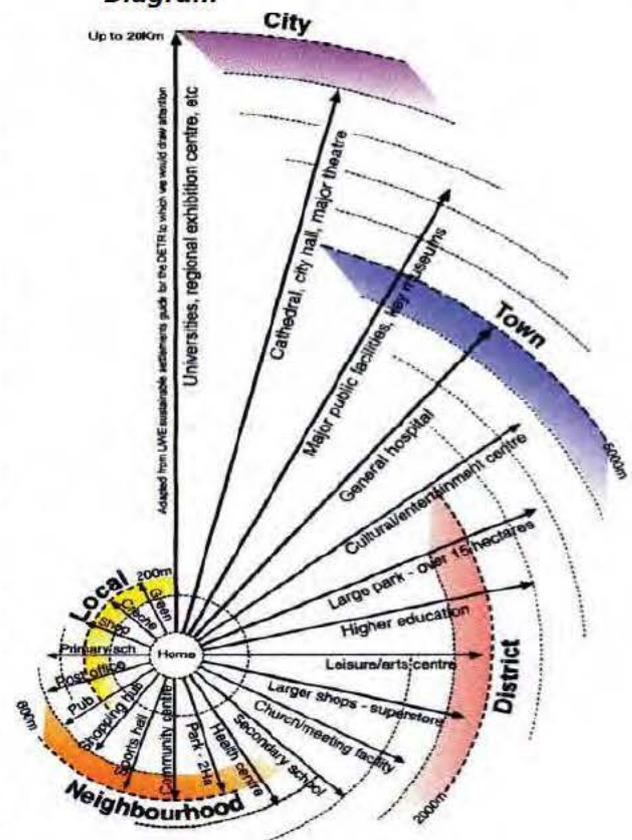
Figure 4.1: Existing and Proposed Retail and Leisure Facilities



5.4 Guidance by the Institute of Transport endorses the following distances to best encourage the use of sustainable transport modes and as illustrated by **Figure 4.2:**

- Circa 200m to a Local Centre/parade including a 'corner shop', take-away, hairdressers, etc;
- Circa 600m to a Neighbourhood Centre including a shopping hub with convenience store, primary school, pub, community centre, etc;
- Circa 1,500 m to a medical centre and secondary school;
- Circa 2,000m to a District Centre including a superstore, larger range of shops and services, churches, meeting facilities, etc;
- Circa 5 km to a Town Centre including shopping, cultural, and entertainment centre, hospital, high education, etc.

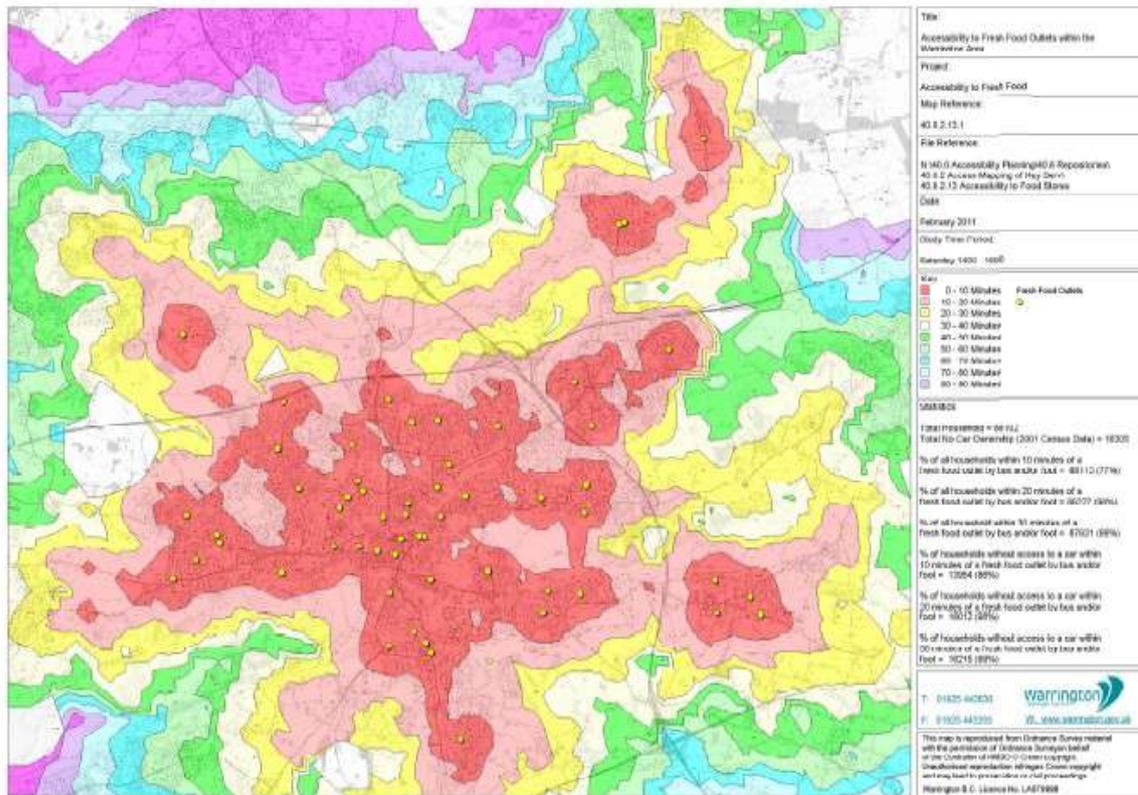
**Figure 4.2: IoT Walking Distances Diagram**



5.5 Helpfully, these terms (i.e. Local, Neighbourhood, District Centres) are largely consistent with the Warrington Retail Evidence Base and the types of centres assessed and categorised in the 2012 Retail Centre Report. That said, each Local and Neighbourhood Centre has its own individual service provision and there can be variation amongst each category in terms of the available provision.

5.6 By utilising such distances, we can map out the accessibility and practicality of existing services in relation to their geographical relationship with the Garden Suburb site and the associated proposals within it. This will identify where there are potential gaps in provision and highlight where voids might need to be filled.

5.7 Indeed, we note that the Figure 7.8 in the 2012 Retail Centre Report (copied below) seeks to illustrate a similar point. Thermo-mapping is used to illustrate the location of facilities that serve fresh food and walking distances/times are used to illustrate how well served certain areas in Warrington are for this type of retailing provision. A 10-minute walking distance is the lowest denominator used, which equates to approximately 800 metres.



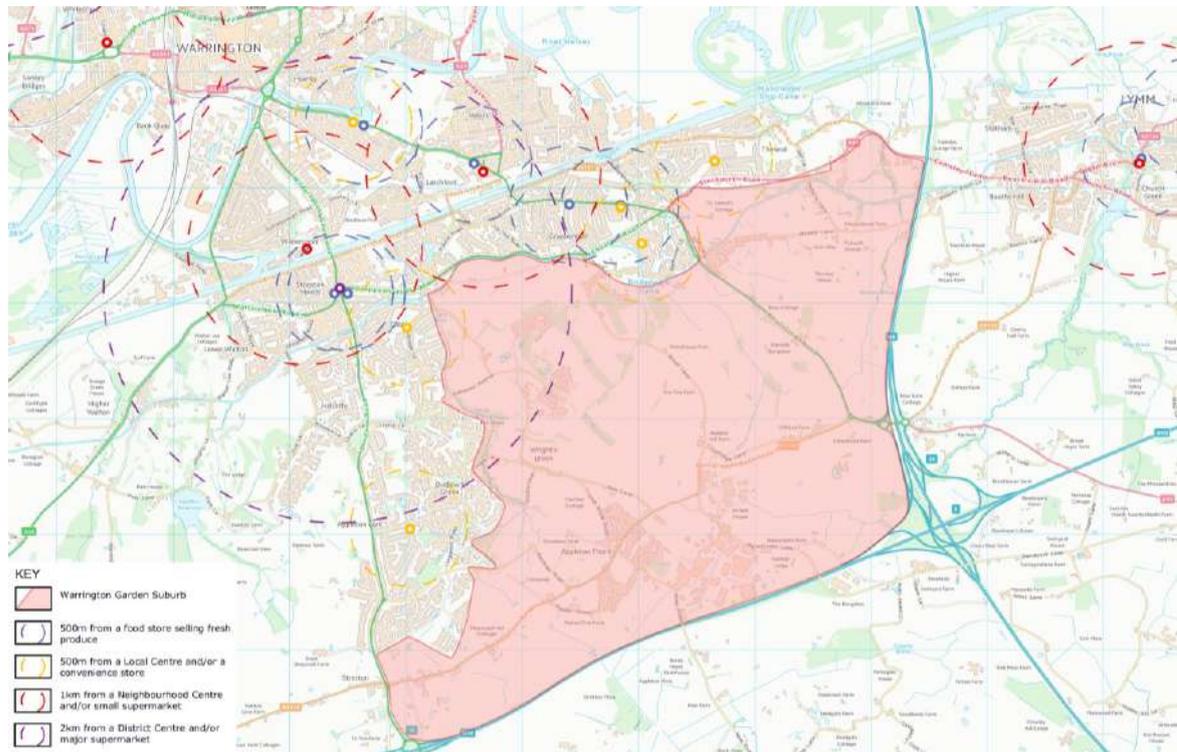
5.8 Whilst it is now out of date, it does illustrate that new shopping facilities (providing fresh food) will need to be provided in the Garden Suburb to ensure it can be regarded as a sustainable location for residential development and to reduce the use of private car modes.

5.9 Using the above guidance and our experience of creating sustainable suburbs and neighbourhoods, we have applied the following distances:

- 500m to a Local Centre and/or a convenience store serving fresh food (i.e. Tesco Express);
- 800m-1km to a Neighbourhood Centre and/or small supermarket (e.g. discount supermarket); and
- 2km to a District Centre and/or major supermarket above 2,500 sq m net.

5.10 We have carried out this exercise and the results are illustrated on the plan at Appendix 2 in terms of the existing provision, which is also copied below at Figure 4.3.

Figure 4.3: Broad Catchment Areas of Retail Facilities in South Warrington



5.11 What is evident is that the existing local retail provision and centres within the southern parts of Warrington are not best placed to facilitate the use of sustainable transport modes. Only Stockton Heath District Centre's broad 2km catchment area covers the northwest corner of the Garden Suburb area.

5.12 In reality, we know that Stockton Heath District Centre draws in trade from further afield, but those customers will inevitably travel by private car and therefore contribute to road congestion within the area.

#### Quality of Existing Retail Provision and Trading Performance

5.13 As highlighted in Figures 4.1 and 4.3, the closest centres and retail provision of any size to the Garden Suburb are Stockton Heath District Centre, including the Morrisons on Greenalls Avenue, Latchford Neighbourhood Centre, and to a lesser degree Lymm Neighbourhood Centre. The following summarises the existing retail provision within these centres and any out-of-centre provision within and around these centres;

- Stockton Heath District Centre;
- Aldi, Walton Road (Stockton Heath);
- M&S Simply Food, Forge Shopping Centre (Stockton Heath);
- Morrisons, Greenalls Avenue;

- Latchford Neighbourhood Centre;
- Lidl, Thelwall Lane (Latchford); and,
- Lymm Neighbourhood Centre.

5.14 The Nexus 2019 Study considered the trading performance of the convenience floorspace in the borough, including those stores/centres listed above. For ease of reference **Table 4.1** below summarises the findings of this.

**Table 4.1 Principal Convenience Store Performance<sup>2</sup>**

Centre/Store	Convenience Benchmark	Survey Derived Turnover	Over/Under-Trading (& Benchmark)
Aldi, Walton Road	£6.1m	£14.8m	+£8.7m (243%)
M&S Simply Food, Forge Shopping Centre <sup>3</sup>	N/A	N/A	N/A
Morrisons Greenalls Avenue	£34.2m	£64.2m	+£30.0m (188%)
Lidl, Thelwall Lane	£7.2m	£5.5m	-£1.7m (-24%)

5.15 Dealing first with the main convenience store provision in Stockton Heath, the Aldi store is smaller than the businesses' modern format stores, the store has been open less than 10 years with its size being restricted by the fact that it occupied an existing retail unit within the District Centre with no real potential for extensions owing to the surrounding land uses. Whilst the store is smaller than newer stores it is very well used as demonstrated by turnover which is equivalent to 243% of the stores expected benchmark turnover. Having visited the store several occasions it is clear that the retail experience suffers as a result of this overtrading including longer than average queue times and limited spaces within the store car park.

5.16 The M&S Simply Food store in Stockton Heath District Centre opened in December 2015 following its acquisition from Co-Op which had previously operated a foodstore from the unit. The foodstore benefits from having access to The Forge Shopping Centre car park and as part of the occupation by M&S was substantially renovated to ensure a high-quality shopping environment. As the store was occupied by M&S Simply Food after the household survey was undertaken in November 2014 there are no published trading patterns for the store. Nevertheless, having visited the store several times it has always appeared to be well used and has no doubt seen an increase in trade since the closure of the M&S store, including Food Hall, in Warrington Town Centre.

5.17 Stockton Heath District Centre provides a strong independent and national retail offer with national multiples including Boots Pharmacy, M&S and Sainsbury's Local. The Nexus 2019 Study highlights the vitality and viability of the District Centre citing the centre's high standard of environmental quality, strong mix of independent and national chains located along London Road and within the

<sup>2</sup> As derived from Nexus 2019 Study Appendix 4 Table 5

<sup>3</sup> No data available as store opened following the Retail Study Household Survey

Forge Shopping Centre **as well as the centre's strong daytime and evening economy.** The Nexus 2019 Study highlighted a vacancy rate of 4.4% (6 units) lower than the 5.8% rate identified in the WYG 2015 study, indicating that the centre has seen an improvement in demand in the intervening period.

- 5.18 The centre has remained popular and continues to have a low vacancy rate. Whilst the centre has lost a number of banks since 2012, this is reflective of the banking industry rather than a sign of weakness for the centre with the vacancies created by these uses being quickly reoccupied by retail or food and drink uses. In addition, the centre has further benefitted from recent investment from M&S. It is clear that the centre remains vital and viable and therefore resilient to change.
- 5.19 The Morrisons store at Greenalls Avenue, north of Stockton Heath District Centre, is the only **'superstore' within the town that is located south of the River Mersey and as such is the principal foodstore serving the south of the town.** Given this it is unsurprising that the Nexus 2019 Study concluded that the store was the strongest performing superstore in the town, overtrading by circa £30million per annum, equating to 188% of its benchmark (expected) turnover. The store benefits from extensive car parking sufficient to serve the store, even allowing for its overtrading, and has seen improvements and investment to the sales floorspace in recent years.
- 5.20 Latchford Neighbourhood Centre is a relative dispersed centre comprising a range of smaller units and a small Co-Op store with a Lidl store and Pets Corners store on the edge of the centre. Other than the Co-Op store, retail provision within the centre is limited to small scale and predominantly independent comparison goods stores highlighting the role of the centre as a Neighbourhood Centre serving the day-to-day shopping and service needs of the local population. The Nexus 2019 Study highlights the limited offer of the centre with a comparison goods turnover of the centre of around £0.8million per annum. The 2012 Retail Centre Report **highlighted that despite the centre's weaknesses in terms of road access and number of older retail premises, the centre was vital and viable.**
- 5.21 The Lidl store on the edge of the Neighbourhood Centre is an older generation store, and therefore smaller than current Lidl store formats. The WYG 2015 study highlighted that the store was significantly overtrading at around 139% of its expected benchmark turnover highlighting the stores role of servicing the local population, although the most recent Nexus 2019 Study suggests that store is undertrading at around -24%. However, this is likely reflective of the increase in sales density nationwide since the 2015 study. Furthermore, we **wouldn't be surprised if the store was still overtrading or at least trading close to its benchmark** owing to the increased popularity of Lidl since the 2014 household survey was undertaken.
- 5.22 Overall it is clear that the stores and centres located closest to the Garden Suburb, in particular Stockton Heath, are trading well and in the case of the foodstore provision, significantly overtrading. This is unsurprising given that the majority of retail floorspace provision within the town is provided within and around Warrington Town Centre or in the northern area of the borough

including the District Centres of Westbrook and Birchwood and the retail parks at Gemini and Junction Nine (formerly Alban Retail Park).

The Qualitative Need Case for a District Centre within the Garden Suburb

5.23 Initial observations are as follows:

- There is only one major supermarket within the area of the Garden Suburb: Morrisons, which is located just to the north of Stockton Heath District Centre;
- The Morrisons and Aldi stores located at Stockton Heath are both significantly overtrading **based on the Council's retail evidence** and our own observations of those stores;
- The Nexus 2019 survey demonstrates that Stockton Heath District Centre has a catchment area that stretches across the entirety of the southern residential areas of Warrington south of the Ship Canal, some areas to the north of the Ship Canal and arguably the village of Lymm for some services. This stretches well beyond a broad 2km catchment area that is deemed to be a typical, broad catchment area for such centres to promote sustainable travel patterns;
- The existing villages in the Garden Suburb area are poorly provided for in terms of retail services and convenience retail provision;
- Stretton Village does include a pub, post office/village store, community centre (and a hotel) and should arguably constitute a Local Centre. The Garden Suburb proposals should seek to strengthen this village rather than provide another centre close by; and,
- The vast majority of the Garden Suburb will not be accessible in terms of their proximity to existing facilities and services due to the lack of services in the area. This is not unsurprising given the lack of existing population within the Garden Suburb site.

5.24 On the plan at Appendix 3 and copied below at Figure 4.4, we have also plotted the same broad catchment areas of the centres that are proposed as part of the Garden Suburb allocation (as set out in the 2019 Development Framework), including 2km for the proposed '**Neighbourhood Centre**' and 500m for the proposed '**Local Centres**'.

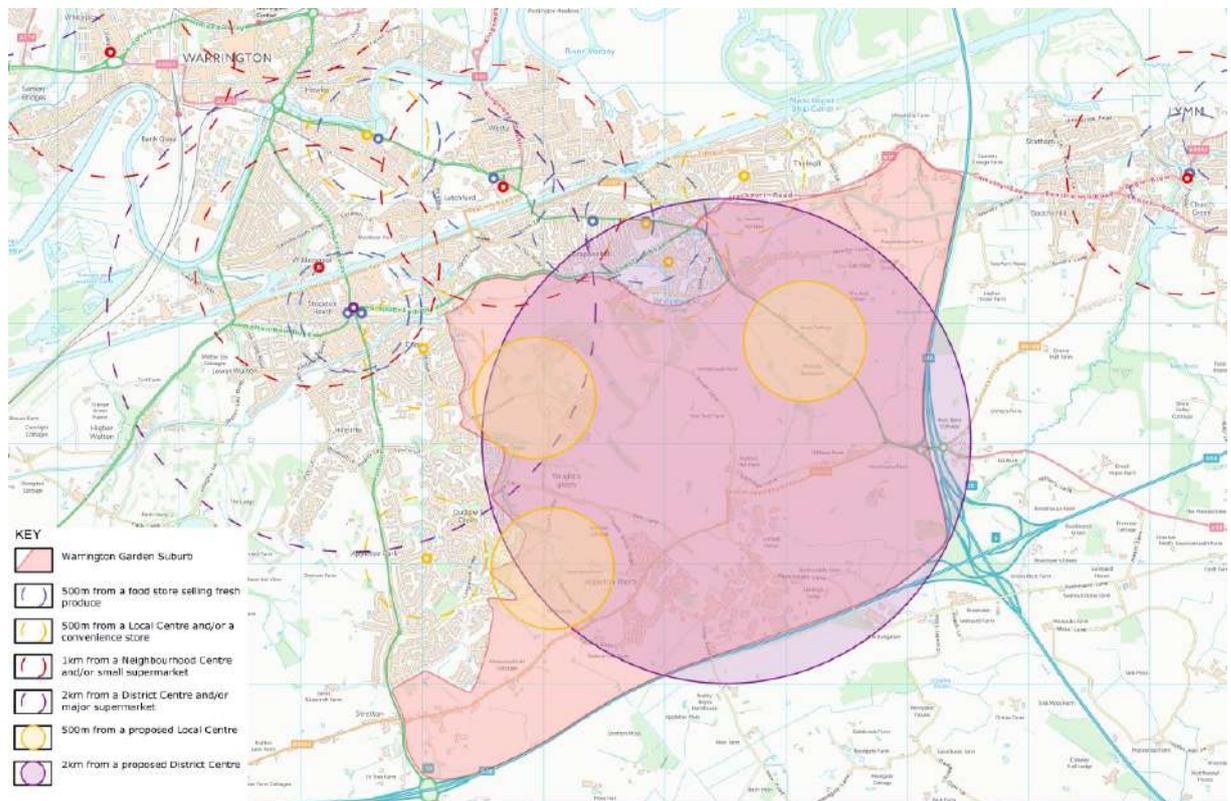
5.25 This helpfully illustrates that the catchment area of the proposed '**Neighbourhood Centre**'<sup>4</sup> would **not unduly overlap with Stockton Heath's 2km catchment area or any of the surrounding Neighbourhood** or a significant number of Local Centres. The proposed '**Local Centres**'<sup>5</sup> would also help meet localised needs (albeit noting the point about Stretton Village above).

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<sup>4</sup> Hereafter referred to as District Centre to align with NPPF definitions and separate representation to Policy DEV5

<sup>5</sup> Hereafter referred to as Neighbourhood Centres/hub to align with NPPF definitions and separate representation to Policy DEV5

Figure 4.4: Broad Catchment Area of Proposed District Centre & Neighbourhood Centres/hubs, Garden Suburb



5.26 In short, there is evidently a qualitative case to be made for additional retail and town centre uses to be provided within the Garden Suburb development on the basis of:

- Providing a sustainable and equitable geographical distribution of centres in the southern area of Warrington to serve the new residents residing in the Garden Suburb;
- Reducing the need for existing and new residents to travel north of the Ship Canal over crossing points that experience congestion;
- Providing some of the existing villages within the Garden Suburb with some localised retail provision to encourage walking for day to day items;
- Relieving some of the overtrading trading pressures experienced at the existing Morrisons and Aldi supermarkets in Stockton Heath; and
- Introducing some additional choice and competition in terms of main food shopping in the southern part of Warrington.

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## 6. QUANTITATIVE NEED CONSIDERATIONS

6.1 It is possible to quantify the level of existing retail / town centre use expenditure in an area by:

- Quantifying the population or number of households within a defined area;
- Applying a per capita or per household expenditure figure to the population or households within a defined area; and,
- Multiplying the two data sets together to provide a quantum of expenditure generated in an area.

6.2 Quantifying future needs can be calculated in a number of ways. One is to calculate the growth in **population/households between a base date and future 'design year' and the anticipated growth in expenditure per capita or per household** and then subtract the level of expenditure available in the base year from the level of expenditure at the design year. The difference represents the level of surplus expenditure available.

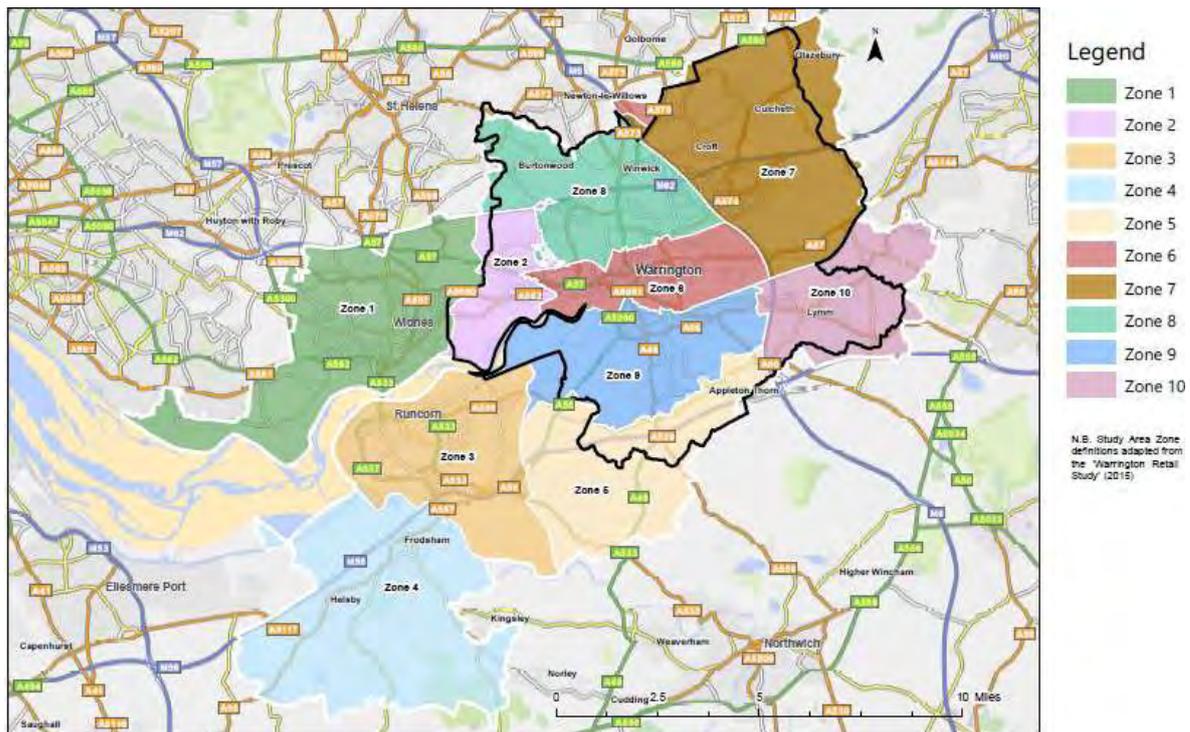
6.3 However, the above approach ignores the fact that there might already be a deficit of provision in a geographical location. Deficits are detectable if there is clear evidence of overtrading at existing locations evidenced by survey information and congestion at existing stores. In simple terms, if there are not enough stores or facilities to serve the existing population, they will evidently be congested on a regular basis. As such, quantitative need can also be assessed by comparing what the average expected turnover of a facility / store would be against what its actual turnover is and what its anticipated turnover would be if there was growth in the amount of expenditure generated in the future (by expenditure or population growth).

6.4 We provide commentary and figures on both approaches below.

### Catchment Areas

6.5 The starting point for any capacity assessment is to define a catchment area.

6.6 Appendix 1 of the Nexus 2019 Study identifies a very large study area broken up into different zones by utilising post code boundaries. The associated Study Area plan is copied below.



- 6.7 Zones 9 covers Stockton Heath, Latchford and Grappenhall and Zone 5 covers Stretton and the rural area to the south of Warrington. Combined they cover the Garden Suburb site.
- 6.8 Zone 6 covers a central area of Warrington, including the town centre. Zone 2 covers Great Sankey and Zone 8 covers north Warrington. Zone 7 covers Birchwood and Zone 10 covers Lymm. Zones 1, 3 and 4 cover areas outside of the Borough in Halton and Cheshire West.
- 6.9 Zones 5, 9 and 10 would cover the catchment area of a proposed District/Local Centre within the Garden Suburb (subject to its scale). As such, we have utilised these zones in terms of quantifying the extent of expenditure available within the area relevant to the Garden Suburb, as identified by the Nexus 2019 study. However, it is worth noting that this includes a reasonable amount of population located north of the Ship Canal. Whilst it is bridged in a number of locations it does represent a physical barrier and the crossing points can often be congested so it will influence shopping patterns in the area.
- 6.10 As such, we have also provided figures based on the following two smaller areas:
- The existing urban and rural areas of Warrington located to the south of the Ship Canal: based on the parish boundaries of Appleton, Grappenhall and Thelwall, Hatton, Stockton heath, Stretton and Walton as illustrated by Figure 5.1 below); and

- The existing rural area and villages within the Garden Suburb: based on Lower Super Output Areas of Warrington 022D (Grappenhall), 024A (Appleton Thorne), 024B (Weaste Lane) and 024D (Stretton and Hatton) as illustrated by Figure 5.2 below)<sup>6</sup>.

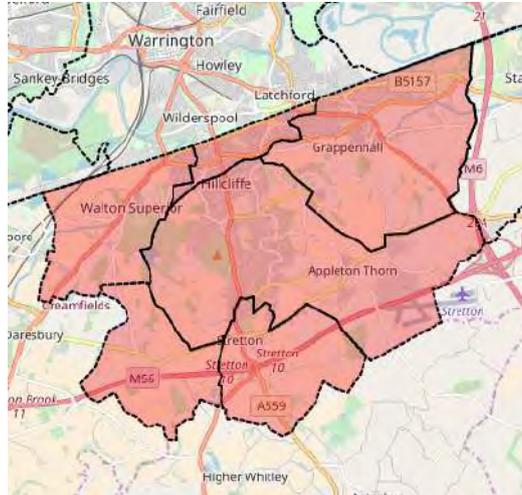


Figure 5.1: Parish Boundary Areas

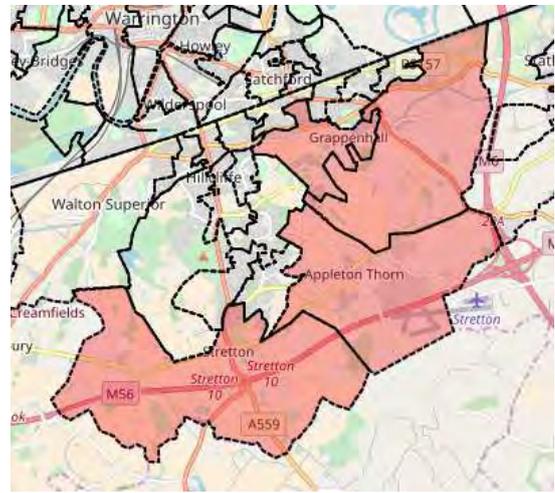


Figure 5.2: Lower Super Output Areas

#### *Expenditure Generated by the Existing Population in South Warrington*

- 6.11 Based on the zones utilised in the Nexus 2019 study, the existing 2018 population across the South Warrington area (i.e. Zones 5 and 9) equates to 39,485 and a further 13,620 people are said to reside in the Lymm Zone (Zone 10).
- 6.12 Nexus present per-capita expenditure figures for convenience and comparison goods in Appendix 4 of their assessment for each zone. Utilising the 2018 figures, this results in the following level of existing expenditure:
- South Warrington (Zones 5 and 9)
  - £97.4m in convenience goods expenditure
  - £151.2m in comparison goods expenditure
  - Lymm (Zone 10)
  - £33.8m in convenience goods expenditure
  - £55.6m in comparison goods expenditure

<sup>6</sup> This area has been assessed to understand the existing capacity within the villages within the Garden Suburb area. There is some slight overlap with the existing urban areas and Hatton does not fall within the Garden Suburb area so we have made minor adjustments to the household figures to account for this.

- 6.13 These are sizable sums that help support the vibrant centres at Stockton Heath, Lymm and other Neighbourhood/Local Centres in the vicinity, as well as Warrington Town Centre and other surrounding retail facilities.
- 6.14 However, it is also worth highlighting that the above figures compare to £367.5m of convenience goods expenditure and £512.9m of comparison goods expenditure generated in the northern parts of Warrington (i.e. Zones 2, 6, 7 and 8). These figures are far higher because of the additional population located in the north of the settlement. This expenditure will principally support the retail facilities in Warrington Town Centre and District, Neighbourhood and Local Centres located in the northern part of the town.
- 6.15 Unfortunately, the Nexus 2019 Study does not quantify expenditure generated for other town centre uses such as other A1 uses classes such as hairdressers, post offices, laundrettes, etc or A2 use classes including professional services (banks, building societies, estate agents, etc) and food and drink uses including A3 (cafés/restaurants), A4 (pubs), and A5 (hot food take-aways), which all provide important and day to day services for a range of centres.
- 6.16 As such, the Nexus 2019 Study only presents part of the expenditure required to support vibrant and healthy centres.
- 6.17 For that reason, we have also utilised 2018 weekly household expenditure data for these types of services and goods and applied that the existing number of households in the area and based on the zones presented in Figures 5.1 and 5.2 above, where we are able to extract the expenditure generated for all town centre retail/service uses.
- 6.18 The average weekly UK household expenditure on:
- A1 other and A2 services = £72.1 (£3,744 per annum)
  - Food and drink (A3-A5 uses) = £38.0 (£1,976 per annum)
- 6.19 The above figures are based on the UK average household size figure being 2.4. In Lymm it is 2.4 and therefore consistent with the UK average. However, in the existing urban and rural parishes to the south of Warrington, the average is 2.5 and in just the rural area covering the Garden Suburb it is 2.7. As such, we have made relevant upward adjustments to the above figures accordingly and consider it would be appropriate to make a similar upward adjustment for the households being proposed in the Garden Suburb too, based on this existing data.
- 6.20 In making these adjustments to the above figures and multiplying them to the population or number of households in each of the areas at 2011 (based on census data) and depending on the use of a per capita or per household expenditure figure, we calculate the following level of expenditure is generated as set out in Table 5.1.

Table 5.1: Expenditure from South Warrington (£m)

Area	Convenience Expenditure	Comparison Expenditure	A1 Other + A2 Expenditure	(A3-A5) Food & Drink Expenditure	Total
South Warrington Parishes	73.9	114.9	47.1	24.8	<b>261</b>
Lymm Parish	30.6	50.4	19.4	10.2	<b>111</b>
Rural Villages LSAO	19.5	31.3	10.5	5.5	<b>67</b>

6.21 The above figures are helpful in starting to calculate what the existing rural villages within the Garden Suburb area will be capable of supporting in terms of retail services if they were to be provided as part of the overall Garden Suburb proposals. They are also helpful in terms of acting as a barometer and comparison to the Nexus figures albeit they do represent slightly different geographical areas.

#### ***Expenditure Generated by the Garden Suburb Proposal***

6.22 To quantify the amount of expenditure that will be generated by the new households in the Warrington Garden Suburb, we have utilised the figures and phases from the 2019 Development Framework. These include:

- Phase 1 = 930 dwellings on Homes England land located outside the Green Belt;
- Phase 2 = 2,797 dwellings;
- Phase 3 = 1,485 dwellings;
- Phase 4 = 2,208 dwellings (safeguarded land).

6.23 We have applied an average household size in the Garden Suburb of 2.6 (see paragraph 5.19 above) to calculate the expected level of population within the Garden Suburb.

6.24 We then apply an average convenience and comparison 2018 per capita figures to the anticipated population figure. For the per capita expenditure figures we have used an average of the figure that would be applied across Zones 5, 9 and 10 of the Nexus 2019 Study should that area be defined as one zone. This is because we would expect the Garden Suburb to generate average expenditure levels similar to this area. This results in a figure of **£2,469** per person for convenience goods and **£3,895** for comparison goods. Whilst it would be entirely reasonable to grow these per capita figures to represent future spending levels and the anticipated design year for the Garden Suburb, for simplicity and to present a worst case scenario in terms of the level of expenditure generated, we have simply relied on 2018 figures.

6.25 The figures are presented in the Table at **Appendix 4** and summarised in **Table 4.2** below, which illustrates **£169m** will be generated overall. This is a significant sum and could clearly be used to support additional floorspace.

Table 4.2: Expenditure from the Garden Suburb Development (£m)

Phase	Convenience Expenditure	Comparison Expenditure	A1 Other + A2 Expenditure	(A3-A5) Food & Drink Expenditure	Total
1	6.0	9.4	3.8	2.0	<b>21</b>
2	18.0	28.3	11.4	6.0	<b>64</b>
3	9.5	15.0	6.0	3.2	<b>34</b>
4	14.2	22.4	9.0	4.7	<b>50</b>
<b>Total GS</b>	<b>47.6</b>	<b>75.1</b>	<b>30.1</b>	<b>15.9</b>	<b>169</b>

6.26 The figures above ignore the fact that there is an existing population within the Garden Suburb area and the surrounding population will also assist in supporting existing and new floorspace. The scenarios below summarise the amount of expenditure generated based on the following scenarios:

- Phase 1 Garden Suburb + Existing Villages;
- Phases 1-3 Garden Suburb + Existing Villages;
- Total Garden Suburb (Phases 1-4) + Existing Villages;
- Total Garden Suburb (Phases 1-4) + Existing South Warrington Area (Z5+Z9); and
- Total Garden Suburb (Phases 1-4) + Existing South Warrington (Z5+Z9) + Lymm (Z10).

Table 4.3: Expenditure from the Garden Suburb Development + Existing Population (£m)

Phase	Convenience Expenditure	Comparison Expenditure	A1 Other + A2 Expenditure	(A3-A5) Food & Drink Expenditure	Total
<b>Phase 1 GS + Villages</b>	25.4	40.7	14.3	7.5	<b>88</b>
<b>Phases 1-3 GS + Villages</b>	52.9	84.1	31.7	16.7	<b>185</b>
<b>Total GS + Villages</b>	<b>67.1</b>	<b>106.4</b>	<b>40.6</b>	<b>21.4</b>	<b>236</b>
<b>Total GS + South Warrington</b>	<b>121.6</b>	<b>190.0</b>	<b>77.2</b>	<b>40.7</b>	<b>430</b>
<b>Total GS + South Warrington + Lymm</b>	<b>152.7</b>	<b>240.4</b>	<b>96.6</b>	<b>50.9</b>	<b>541</b>

### Capacity for New Retail Floorspace

6.27 The 2019 Nexus study considered the capacity and need for new retail floorspace within the borough.

6.28 It identifies a requirement for new foodstore floorspace by 2037 of between 2,700m<sup>2</sup> and 4,800m<sup>2</sup>, which it suggests supports the designation of the new centres in the Garden Suburb, South West Extension, Waterfront and Peel Hall. It also identified additional capacity should the delivery of the commitments at the Omega urban extension and at Westbrook District Centre (amongst others) not be delivered.

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- 6.29 It goes on to suggest that the identified requirement across the plan period is equivalent to that which would be typically provided by two or three discount foodstores.
- 6.30 The Nexus 2019 Study also suggests that it would be beneficial for Warrington Town Centre to improve its convenience goods offer, exacerbated through the loss of the town centre M&S store in 2017.
- 6.31 As highlighted in Section 4 of this report, the Nexus 2019 Study highlights the overtrading of those stores closest to the Garden Suburb noting that the Morrisons at Greenalls Avenue, north of Stockton Heath District Centre, was the strongest performing superstore in the town, overtrading by circa £30m per annum, equating to 188% of its benchmark (expected) turnover, with the Aldi store in Stockton Heath District Centre overtrading by circa £8.7m which equates to 243% of its benchmark (expected) turnover.
- 6.32 The Lidl store at Latchford was found to be undertrading by around -24% although this is likely reflective of the increase in sales density nationwide since the 2015 study. Furthermore, we would not be surprised if the store was at least trading close to its benchmark owing to the increased popularity of Lidl since the 2014 household survey was undertaken. We also expect given the proximity of the store to the northern part of the Garden Suburb that it will benefit from the increased population and expenditure.
- 6.33 In respect of comparison goods capacity/need, the Nexus 2019 Study concluded that there was not significant deficiencies in comparison goods shopping provision within the borough albeit allowing for population growth (based on population projections) and expenditure growth the assessment highlighted a potential need for between 17,800m<sup>2</sup> to 27,900m<sup>2</sup> of comparison goods floorspace by 2037.
- 6.34 Nexus did not assess the capacity generated by the proposed Garden Suburb. Our assessment is set out above and at the Table at Appendix 4 which clearly illustrates that additional expenditure for new retail floorspace.
- 6.35 The Table at Appendix 4 also sets out two development scenarios for each of the phases and geographical areas. Firstly, we split the available convenience goods expenditure by Main Food and Top Up retailing. We assume an industry standard of 70% Main Food and 30% Top up.
- 6.36 Scenario 1 assumes all of the main food expenditure will go towards supporting a main food supermarket, such as the Morrisons at Stockton Heath, and all of the top up expenditure will go to a smaller convenience store, such as the Co-op Food at Grappenhall.
- 6.37 Scenario 2 assumes the following:
- 80% of the Main Food Expenditure will go to a large supermarket;
  - 80% of the Top Up Expenditure will go to a convenience store; and

- 20% of Main Food & 20% of Top Up Expenditure will go to a medium-sized discount supermarket, such as the Aldi at Stockton Heath.

6.38 We then apply a company average sales density to the amount of expenditure afforded to each category to generate floorspace requirements for each of the phases. In this instance, we have used sales densities provided by Verdict for each of the main convenience retailers for 2018. We have averaged the company average sales densities for each of the three categories:

- Main Food Supermarket = Average of ASDA, Morrisons, Sainsbury's, Tesco and Waitrose = **£12,949** per sq m;
- Discount Supermarket = Average of Aldi, Lidl and Iceland = **£9,263** per sq m
- Convenience = Average of Co-op, M&S Food, Tesco and Sainsbury's = **£11,697** per sq m

6.39 The results for different phases are summarised below.

**Table 4.4: Convenience Floorspace Requirements (sq. m net)**

Scenario	Scenario 1		Scenario 2		
	Main Food	Top Up	Large Supermarket	Discount Supermarket	Convenience Store
Phase 1 GS	323	153	258	129	123
Phase 1-3 GS	1,809	858	1,447	722	687
Total GS Phases 1-4	2,575	1,222	2,060	1,029	977
Phase 1 GS + Villages	1,374	652	1,099	549	522
Phases 1-3 GS + Villages	2,860	1,357	2,288	1,142	1,086
Total GS Phases 1-4 + Villages	<b>3,627</b>	<b>1,721</b>	<b>2,901</b>	<b>1,448</b>	<b>1,376</b>
Total GS + South Warrington	6,572	3,118	5,258	2,625	2,494
Total GS + South Warrington + Lymm	8,226	3,903	6,581	3,286	3,122

6.40 To provide a benchmark or comparison, it is helpful to note that the Nexus 2019 Study confirms that the existing Morrisons supermarket at Stockton Heath has 2,782 sq. m of convenience goods floorspace, whilst the Aldi in Stockton Heath has 576 sq. m of convenience goods floorspace.

6.41 Most new discounter stores being developed now contain about 650 sq. m net convenience floorspace within a 1,014 sq. m gross store (circa 10,900 sq. ft). The larger main food supermarket retailers are very rarely developing the vary large stores these days. Indeed, we are unlikely to see the scale of store developed by Tesco north of Warrington in the foreseeable future. However, where there are new markets created by development growth, new supermarkets are still being developed.

6.42 The above table would suggest that the Garden Suburb development, on its own, could generate enough expenditure to support up to 1 main-food supermarket, 1 discount supermarket, and a number of smaller convenience stores and other convenience retailers. This is a useful barometer because in theory it means this level of floorspace could be delivered without having a harmful impact on the existing retail provision in the area.

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- 6.43 Convenience goods shopping generates regular and frequent shopping trips. As such, and as already highlighted, convenience goods floorspace provision should be located in close proximity to where there is evident demand, whilst respecting the need to protect existing retail centres. We have set out in the previous section, that there is a qualitative and geographical case to provide a new District/Local Centre and Local Centres within the Garden Suburb to facilitate and encourage sustainable modes of travel to retail centres, all of which should ideally be supported by some form of convenience goods provision.
- 6.44 However, it is also important to consider when this floorspace is delivered and its phasing along with the new residential homes. Indeed, if too much convenience floorspace is delivered early on in the **Garden Suburb's** development, it could in theory have a negative impact on existing centres subject to their existing health. We address this in more detail in the following section. Conversely, if too little floorspace is delivered, existing facilities might not be able to cope with the additional volume of custom. It could also be difficult to create a sense of place or sufficient scale and footfall to attract a diverse range of businesses to create a new District/Local Centre.
- 6.45 We address these points in greater detail in the following Section 8.

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## 7. IMPACT CONSIDERATIONS

7.1 This section considers the impact of the failure to provide any, or a sufficient level of, retail floorspace within the Garden Suburb and in particular any planned District/Local Centre. We then go on to assess and comment on the likely impact of any retail development on existing centres within the area.

### Convenience Goods Retailing Impacts – Do Nothing Scenario

7.2 In the event that no new retail provision is provided within the Garden Suburb, it is anticipated that the vast majority of trade associated with the new residential development, and a small amount of trade associated with the employment development, would be drawn to existing facilities located in proximity of the Garden Suburb.

7.3 These existing facilities are located beyond the guidance distances endorsed by the Institute of Transport (see paragraph 4.4) and as such would fail to encourage the use of sustainable transport modes and fail to reduce the need to travel. Despite this, residents living within the Garden Suburb will clearly need to undertake convenience goods shopping trips and will undoubtedly be attracted to those facilities that are closest.

7.4 Whilst a small proportion of these needs could be met by online shopping, this would not meet the majority of residents shopping needs and as such residents would still travel to use existing facilities where they are available although this would increase travel distances and increase reliance on private modes of transport to access such facilities.

7.5 As a starting point, we have therefore applied existing market share data for main and top-up convenience goods expenditure for Zone 9 as derived from Appendix 4, Table 3 of the 2019 Nexus study. Zone 9 shopping pattern data has been relied upon as this zone covers the majority of the proposed Garden Suburb and therefore best reflects the potential shopping patterns for new residents within the Garden Suburb if no new retail provision was delivered within the Garden Suburb.

7.6 The key market shares figures for main food shopping for Zone 9 include the following:

- 74.5% of main shopping undertaken in facilities located in Zone 9, with 65% directed to the edge/out of centre Morrisons store at Stockton Heath and 8.9% to the Aldi store at Stockton Heath.
- 21.1% of main food shopping undertaken in facilities in Zone 6, with 11.6% going to the out of centre Sainsbury's, Church Street, Warrington, 3.6% to the Tesco Extra and 2.1% to the Aldi, Crossfield Street, Warrington and 1.9% to the ASDA at Cockhedge Shopping Centre.
- 1.9% to facilities within Zone 7 and the Birchwood area.

- 0.8% to facilities in Zone 8 and the Westbrook area.
- 1.7% to facilities outside the Study area including the Waitrose and M&S Food Hall, Northwich.

7.7 Top-up shopping is more localised with the following market shares being relevant:

- 78.2% to facilities within Zone 9 but with a greater distribution to a range of smaller stores and the main food supermarkets, with the Tesco Express at Grappenhall claiming 22.5%, Morrisons, Stockton Heath attracting 13.6% and the Co-op, Dudlow Green getting 13%.
- £15.6% going to facilities within Zone 6, with smaller stores and the larger supermarkets attracting trade.
- 2.5% going to facilities in Zone 3, Runcorn.
- 2.3% going to facilities in Zone 10, Lymm Village.
- 1.4% going to facilities in Zone 7, Birchwood.

7.8 Table 2 at Appendix 4 provides a full breakdown on the likely impact that such a scenario would have on existing convenience goods retail provision in the area assuming the same market shares as above and within the Nexus 2019 Study are applied. This table also provides details of each **stores 'benchmark' or expected turnover for comparison and analysis purposes.**

7.9 For ease of reference, Table 6.1 below summarises the impact of the do-nothing scenario on the principal foodstores within the areas surrounding the proposed Garden Suburb.

7.10 As can be seen within the below table, whilst some of the identified stores would continue to trade below benchmark levels (including the ASDA and Tesco Extra stores in Warrington), all of the others identified will trade above their benchmark trading position, with the majority significantly overtrading.

**Table 6.1: Do-nothing Scenario - Impact on Incumbent Stores**

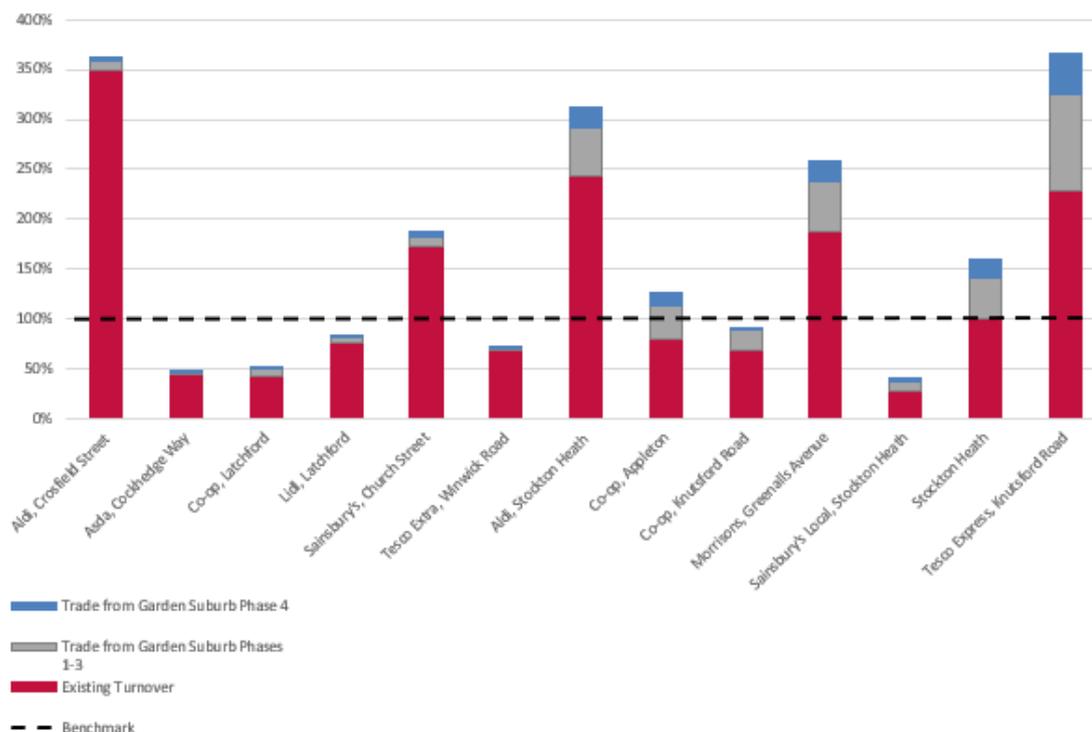
Store	Existing		Post Completion of Phases 1-3 Garden Suburb		
	Current B'mark (£m)	Current Turnover (£m)	Trade Draw from GS (£m)	Overtrading (£m)	Comparison with B'mark (%)
<b>Zone 6</b>					
Aldi, Crosfield Street	6.2	21.6	0.62	16.02	358%
Asda, Cockhedge Way	39.9	17.8	0.79	-21.31	47%
Co-op, The Bridges, Latchford	3.3	1.4	0.23	-1.67	50%
Lidl, Thelwall Lane, Latchford	7.2	5.5	0.38	1.32	82%
Sainsbury's, Church Street	30.8	53.0	3.18	25.38	182%
Tesco Extra, Winwick Road	53.4	36.4	1.00	-16.00	70%
<b>Zone 9</b>					
Aldi, Stockton Heath	6.1	14.8	3.01	11.71	292%
Co-op <sup>7</sup> , Appleton	4.1	3.3	1.31	0.51	112%
Co-op, Knutsford Road <sup>8</sup>	3.6	2.5	0.70	-0.40	89%
Morrisons, Greenalls Avenue	34.2	64.2	16.84	46.84	237%
Sainsbury's <sup>9</sup> , Stockton Heath	2.9	0.8	0.29	-1.81	37%
Stockton Heath	0.2	0.2	0.08	0.08	141%
Tesco Express, Knutsford Road <sup>10</sup>	2.5	5.7	2.41	5.61	324%

7.11 In particular, the overtrading of those stores which perform a main food shopping role located closest to the Garden Suburb will be exacerbated. Aldi in Stockton Heath is expected to trade almost three times over its expected benchmark turnover whilst the Morrisons at Greenalls Avenue would trade over double its expected benchmark turnover. The impact of this is illustrated at **Figure 6.1** which also takes account of additional trade drawn from Phase 4 of the Garden Suburb.

7.12 It is important to note that this illustration does not take account of any future expenditure growth either through an increase in per capita expenditure on convenience goods, population growth within the store's catchment outside of the Garden Suburb or expenditure associated with employees based at the planned employment developments which form part of the Garden Suburb. As such, the actual overtrading of these stores is expected to be underestimated within these figures and therefore the actual future overtrading position of these stores is likely to be greater.

<sup>7</sup> Dudlow Green Road  
<sup>8</sup> Grappenhall  
<sup>9</sup> Sainsbury's Local  
<sup>10</sup> Grappenhall

Figure 6.1: Performance of Incumbent Stores in Do-nothing Scenario



7.13 When considering this, it is necessary to consider what the actual impact of this increase in overtrading would have. Clearly the strong performance of a store that is located within a defined town centre is a positive as it enhances the vitality and viability of a centre. However, where stores are significantly overtrading they can suffer from operational challenges which **affect customer's** shopping experience and their ability to undertake shopping trips in an efficient manner. Such challenges can include congestion within the car park and difficulty parking, longer queuing times at checkouts, a lack of stock on shelves **and congestion within the store's aisles. This can lead to** customers choosing to undertake shopping trips elsewhere, sometimes further afield, and/or congestion affecting the local highway network.

7.14 Clearly in respect of those stores located closest to the Garden Suburb, these are already suffering from operational challenges highlighting the existing quantitative and qualitative needs in the locality. The exacerbation of this is likely to result in customers choosing, or being forced to, change their shopping patterns and shop elsewhere which could result in adverse impact on defined centres of Stockton Heath (Aldi) and the potential loss of expenditure outside of the borough.

7.15 In addition to this, the do-nothing scenario would result in residents of the Garden Suburb being forced to travel greater distances to undertake both main and top-up convenience shopping trips unnecessarily increasing the impact on the local highway network and increasing the reliance upon

private modes of transport to undertake even small convenience goods shopping trips. Clearly such a scenario would not create a sustainable urban extension as envisaged by the Garden Suburb.

#### Comparison Goods Retailing Impacts – Do Nothing Scenario

- 7.16 As set out in Section 5, the Garden Suburb (Phases 1-3) will generate around £53m of comparison goods expenditure, with a further £22m beyond the plan period (Phase 4), totalling £75m.
- 7.17 The total comparison goods expenditure<sup>11</sup> for the Borough<sup>12</sup> amounted to circa £824 million at the 2018 base year of **Nexus's study**. The comparison goods expenditure generated by the Garden Suburb would therefore represent a 9% growth in available comparison goods spending within Warrington.
- 7.18 Comparison shopping patterns are typically wider spread than convenience shopping patterns. Indeed, there is a significant amount of competition and provision within the wider area, which will claim much of the comparison goods expenditure generated under the do-nothing scenario. Warrington has a large town centre and there are a number other retail parks, such as Gemini Retail Park, located to the north which capture trade from across the town.
- 7.19 Table 25 in Appendix 4 of the Nexus 2019 Study summarises and calculates the expenditure and shopping patterns for a wide range of comparison good types. Residents in Zone 9 (which covers the Garden Suburb area) generate a total of £134.5m of comparison goods expenditure.
- 7.20 This is spent in the following manner based on the survey results supporting the Nexus 2019 study:
- £73.5m to Zone 6, which includes Warrington Town Centre and other retail locations close to the town centre (55% market share);
  - £27.5m to Zone 8, where Gemini Retail Park, Westboork District Centre, and Winwick Retail Park are located (20% market share);
  - Circa £20.9m to a wide range of towns and locations outside of Warrington (16% market share);
  - £9.9m to Zone 9, which includes Stockton Heath District Centre (7% market share); and
  - £2.7m to Zone 10, Lymm Neighbourhood Centre (2% market share).
- 7.21 If we assumed the same market share rates, the retail provision within Zone 6 (within and around Warrington Town Centre) would see a £41m increase in revenue post Phase 4 of the Garden Suburb Proposal, which represents an 8% increase. This is significant and should be cited as a consequential positive impact of the overall Garden Suburb proposals.

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<sup>11</sup> 2019 Retail Assessment Appendix 4 Table 7a multiplied by 7b.

<sup>12</sup> Zones 2 & 6-10

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- 7.22 Existing comparison goods retail provision within Zone 8 would also see a £15m increase (7% increase) albeit it is noted that most of this floorspace is located out of centre.
- 7.23 Existing provision in Zone 9, which includes Stockton Heath District Centre would see the greatest percentage increase at 32% (£23m), which is substantial.
- 7.24 It should also be noted that the Garden Suburb development will generate a significant amount of additional retail and service/food and drink expenditure amounting to around £32.4m during the plan period (Phases 1-3) with a further £13.7m beyond the plan period (Phase 4). Whilst the Nexus 2019 Study does not provide market share information in relation to these types of services, it is reasonable to assume that Warrington, Stockton Heath and other neighbouring centres would all benefit from this additional trade under the do-nothing scenario.
- 7.25 Unfortunately, it is not possible to present a similar do-nothing assessment for comparison, retail services and leisure uses (as has been carried out for the convenience goods market in terms of the overtrading against benchmark averages) because many of the associated businesses/retailers are **independent and there isn't reliable 'average' information in this regard**. However, it is far less likely that individual comparison goods stores and other retail and leisure services would suffer from operational difficulties due to this additional trade. This is because such uses are utilised less frequently by customers and the impacts would be dissipated across a large number of outlets.
- 7.26 Obvious potential impacts would be increased congestion and footfall in the centres as a whole, which can be cited as a positive outcome of the Garden Suburb proposal overall. In terms of potential adverse impacts, this might be most noticeable on the local road network and congestion within public car parks if insufficient capacity exists.
- 7.27 We have no empirical or highway evidence at this stage to suggest this would compromise the attractiveness of neighbouring centres but we do note from general observations when visiting the area that Stockton Heath District Centre is already congested on a frequent basis in terms of vehicular movements. The highway impacts of the Garden Suburb will need to be assessed by the Council in detail regardless but under the no-development scenario, we would expect highway impacts on existing centre to be greater.
- 7.28 What is evidently apparent, however, is that even if we were to allow for comparison goods to be developed on the site, there will still be additional expenditure and trade generated by the Garden Suburb proposal that will ultimately be spent in other, existing retail locations in and around Warrington, which would either result in positive trading impacts on those centres or at the very least help to offset impacts associated with the development of a District/Local Centre.
- 7.29 In summary, there is clearly a need for new retail provision within the Garden Suburb to help create a sustainable development and reduce the need of new residents to travel. A failure to provide appropriate provision will see the overtrading of existing foodstore exacerbated to such a degree

that many will struggle to cope with the extra custom and which could create operational issues in the stores and/or lead to customers choosing to shop elsewhere.

Determining the Potential Scale and Format of the District/Local Centre within the Garden Suburb

- 7.30 No specific proposals have been put forward by the Local Planning Authority in terms of what the proposed District/Local Centre could contain in terms of retailing and service provision other than it will include a supermarket, local shops and services.
- 7.31 The capacity assessment set out in this report demonstrates that the amount of expenditure generated by the Garden Suburb proposals overtime will be substantial and would justify the delivery of a new supermarket, a discount foodstore, other convenience provision, some comparison goods retailing and a range of other services.
- 7.32 The qualitative assessment also confirms that the location of the proposed District/Local Centre will ensure that its principal catchment area (circa 2km) will cover the whole of the Garden Suburb but will only have a limited overlap in catchment with the closest District Centre (Stockton Heath) and large superstore (Morrisons, Greenall Avenue). In addition, the District/Local Centre's **principal** catchment will only cover small existing residential areas within the Borough covering parts of Appleton, Grappenhall, Grappenhall Heys and Appleton Thorn.
- 7.33 Given this, it is not unreasonable to assume at the outset that there will be a limited level of trade drawn to the District/Local Centre from outside the Garden Suburb area, meaning that the impacts on existing shopping patterns will be limited which in turn will limit any impact on defined centres within the Borough. Notwithstanding this, it is still important to test and examine the impact of a new District/Local Centre within the Garden Suburb.
- 7.34 It will ultimately be for the retail market to determine what is deliverable and therefore alternative schemes might come forward which will need to be assessed in terms of their impact. At this stage, however, it is considered relevant and reasonable to test the impact of a proposal that is:
- a) of sufficient scale to attract customers and compete with surrounding facilities; whilst,
  - b) not being so large that it would unduly disrupt existing shopping patterns (i.e. it should not draw in significant customers from locations beyond or near to existing Town and District Centres within the vicinity – namely Stockton Heath and Warrington Town Centre).
- 7.35 To provide some indication and guidance, we have examined the scale and format of the other three District Centres within Warrington.

*Stockton Heath District Centre*

7.36 The Healthcheck Assessment provided at Appendix 3 of the Nexus 2019 Study confirms that in 2018 Stockton Heath District Centre contained a total of 137 units and a total gross floor area of 23,170 sq m. The unit and floorspace split is contained within Tables 1 and 2 of the Nexus 2019 Study appendix.

**Table 1 District Centre Floorspace Composition**

GOAD Category	Stockton Heath District Centre Floorspace at 2015 (sq.m)	Stockton Heath District Centre Floorspace at 2015 (%)	Stockton Heath District Centre Floorspace at 2018 (sq.m)	Stockton Heath District Centre Floorspace at 2018 (%)	Floorspace UK Average at 2018 (%)
Convenience	9,860	41.3	9,800	42.3	15.2
Comparison	3,310	13.9	3,480	15.0	35.5
Retail Services	1,890	7.9	2,090	9.0	6.8
Leisure Services	5,870	24.6	5,040	21.8	24.7
Financial and Business Services	2,240	9.4	1,770	7.6	7.9
Miscellaneous	0	0.0	0	0.0	0.1
Vacant	720	3.0	990	4.3	9.3
<b>TOTAL</b>	<b>23,890</b>	<b>100</b>	<b>23,170</b>	<b>100</b>	<b>100</b>

*Source: Composition of Stockton Heath District Centre and District Centre Average derived from Nexus Planning Survey of May 2018; Warrington Retail and Leisure Study August 2015; UK Average from Experian GOAD Report March 2018*

**Table 2 District Centre Unit Composition**

GOAD Category	Stockton Heath District Centre Number of Units at 2015	Stockton Heath District Centre Units at 2015 (%)	Stockton Heath District Centre Number of Units 2018	Stockton Heath District Centre Units at 2018 (%)	Units UK Average at 2018 (%)
Convenience	10	7.2	9	6.6	8.7
Comparison	35	25.4	36	26.3	31.6
Retail Services	26	18.8	31	22.6	14.2
Leisure Services	38	27.5	37	27.0	23.6
Financial and Business Services	21	15.2	18	13.1	10.5
Miscellaneous	0	0.0	0	0.0	0.2
Vacant	8	5.8	6	4.4	11.2
<b>TOTAL</b>	<b>138</b>	<b>100</b>	<b>137</b>	<b>100</b>	<b>100</b>

*Source: Composition of Stockton Heath District Centre and District Centre Average derived from Nexus Planning Survey of May 2018; Warrington Retail and Leisure Study August 2015; UK Average from Experian GOAD Report March 2018*

7.37 Stockton Heath is a typical historic, 'High Street' District Centre that has built up and evolved over a this and the last century. It comprises of a large number of traditional small units and some larger stores built on its periphery as illustrated by the plan below.



- 7.38 To precisely replicate this form today through a new development is unlikely to prove viable. Certain design references, scale and massing would also need to be considered in the context of the creating a new Garden Suburb and the general concept of Garden Settlements.
- 7.39 However, the above figures provide a useful background in terms of highlighting what might represent the absolute upper limit of any new District/Local Centre in the Garden Suburb. In reality, far fewer units are likely to be developed and the scale of retail development is likely to be a lot less in overall terms.
- 7.40 Of particular relevance, however, is the scale of the existing Morrisons store at Stockton Heath bearing in mind it is this store that attracts the most convenience shopping trade from Zone 9 (and notably a number of other surrounding zones given the general lack of provision of other main supermarkets located to the south of the Ship Canal). Testing the impact of a new store which could effectively compete with the Morrisons store and of a reasonably similar scale is therefore a reasonable prospect.

- 7.41 It is reported in Appendix 4, Table 5 of the Nexus 2019 Study that the Morrisons store has a gross floorspace of 7,506 sq m, a net sales floor area of 3,698 sq m, of which circa 2,782 sq m is net convenience floorspace. As such, the store has quite a low gross to net ratio of circa 50%.
- 7.42 The Aldi store has is reported to have a gross area of 1,115 sq m and net area of 660 sq m, resulting in a ratio of 59%.

#### *Westbrook and Birchwood District Centres*

- 7.43 Whilst still developed in a different retailing era, more modern District Centres within Warrington which serve areas of Warrington that underwent expansion in previous decades, include Birchwood District Centre and Westbrook District Centre.
- 7.44 For Westbrook District Centre, at Appendix 3 of the Nexus 2019 Study confirms that it comprises of 15 separate units covering a gross floor area of 15,738 sq m of which more than half relates to the large ASDA store. There is a cinema in the centre which makes up a large part of the overall floorspace. There are only 3 comparison goods retail units occupied by a chemist, charity shop and carpet shop and therefore Nexus confirm that the convenience and comparison offer lack some variety when compared to other centres (whilst noting that this is reflective of the size of the ASDA and its range of comparison goods).

**Table 1 District Centre Floorspace Composition**

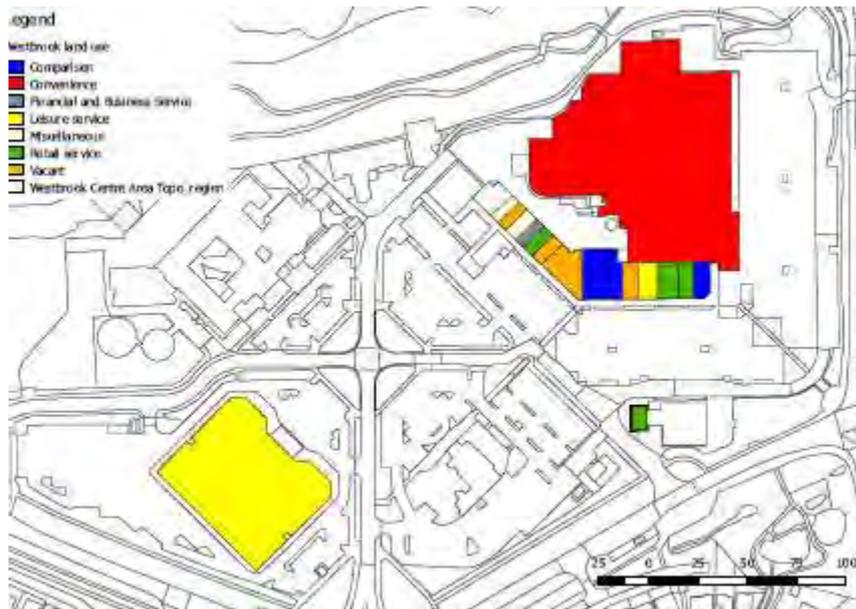
GOAD Category	Westbrook District Centre Floorspace at 2015 (sq.m)	Westbrook District Centre Floorspace at 2015 (%)	Westbrook District Centre Floorspace at 2018 (sq.m)	Westbrook District Centre Floorspace at 2018 (%)	Floorspace UK Average at 2018 (%)
Convenience	7,392	55.1	9,433	59.9	15.2
Comparison	577	4.3	847	5.4	35.5
Retail Services	470	3.5	373	2.4	6.8
Leisure Services	4,472	33.3	4,352	27.7	24.7
Financial and Business Services	52	0.4	163	1.0	7.9
Miscellaneous	0	0.0	0	0.0	0.1
Vacant	452	3.4	570	3.6	9.3
<b>TOTAL</b>	<b>13,497</b>	<b>100</b>	<b>15,738</b>	<b>100</b>	<b>100</b>

Source: Composition of Westbrook District Centre and District Centre Average derived from Nexus Planning Survey of May 2018; Warrington Retail and Leisure Study August 2015; UK Average from Experian GOAD Report March 2018

**Table 2 District Centre Unit Composition**

GOAD Category	Westbrook District Centre Number of Units at 2018	Westbrook District Centre Units at 2018 (%)	Westbrook District Centre Number of Units 2018	Westbrook District Centre Units at 2018 (%)	Units UK Average at 2018 (%)
Convenience	1	6.7	1	6.7	8.7
Comparison	3	20.0	3	20.0	31.6
Retail Services	4	26.7	4	26.7	14.2
Leisure Services	4	26.7	2	13.3	23.6
Financial and Business Services	1	6.7	1	6.7	10.5
Miscellaneous	0	0.0	0	0.0	0.2
Vacant	2	13.3	4	26.7	11.2
<b>TOTAL</b>	<b>15</b>	<b>100</b>	<b>15</b>	<b>100</b>	<b>100</b>

Source: Composition of Westbrook District Centre and District Centre Average derived from Nexus Planning Survey of May 2018; Warrington Retail and Leisure Study August 2015; UK Average from Experian GOAD Report March 2018



7.45 It is reported in Appendix 4, Table 5 of the Nexus 2019 Study that the ASDA store at Westbrook has a gross floor area of 9,459 sq m, with a net floor area of 5,098 sq m which represents a gross to net area of circa 54%.

7.46 Birchwood District Centre is much larger than Westbrook and has a broader range and offer available. It is reported to have 49 retail units in 2018, which amounted to 24,280 sq m gross, with 52% of the floorspace occupied by convenience retailers, 33% by comparison retailers (most of which were national multiples), 5% by retail services, 7% leisure and 3% vacant.

**Table 1 District Centre Floorspace Composition**

GOAD Category	Birchwood District Centre Floorspace at 2015 (sq.m)	Birchwood District Centre Floorspace at 2015 (%)	Birchwood District Centre Floorspace at 2018 (sq.m)	Birchwood District Centre Floorspace at 2018 (%)	Floorspace UK Average at 2018 (%)
Convenience	11,880	47.7	12,670	52.2	15.2
Comparison	9,400	37.8	8,070	33.2	35.5
Retail Services	950	3.8	1,110	4.6	6.8
Leisure Services	1,600	6.4	1,620	6.7	24.7
Financial and Business Services	190	0.8	0	0	7.9
Miscellaneous	0	0.0	0	0	0.1
Vacant	870	3.5	810	3.3	9.3
<b>TOTAL</b>	<b>24,890</b>	<b>100</b>	<b>24,280</b>	<b>100</b>	<b>100</b>

*Source: Composition of Birchwood District Centre and District Centre Average derived from Nexus Planning Survey of May 2018; Warrington Retail and Leisure Study August 2015; UK Average from Experian GOAD Report March 2018*

**Table 2 District Centre Unit Composition**

GOAD Category	Birchwood District Centre Number of Units at 2018	Birchwood District Centre Units at 2018 (%)	Birchwood District Centre Number of Units 2018	Birchwood District Centre Units at 2018 (%)	Units UK Average at 2018 (%)
Convenience	6	11.3	8	16.3	8.7
Comparison	24	45.3	21	42.9	31.6
Retail Services	9	17.0	10	20.4	14.2
Leisure Services	9	17.0	7	14.3	23.6
Financial and Business Services	1	1.9	0	0.0	10.5
Miscellaneous	0	0.0	0	0.0	0.2
Vacant	4	7.5	3	6.1	11.2
<b>TOTAL</b>	<b>52</b>	<b>100</b>	<b>49</b>	<b>100</b>	<b>100</b>

*Source: Composition of Birchwood District Centre and District Centre Average derived from Nexus Planning Survey of May 2018; Warrington Retail and Leisure Study August 2015; UK Average from Experian GOAD Report March 2018*



7.47 It was also noted in the Nexus 2019 Study that the centre included other community services such as a medical centre, dentists and advice centre.

7.48 It is reported in Appendix 4, Table 5 of the Nexus 2019 Study that the ASDA store has a gross floor area of 10,055 sq m, with a net floor area of 5,718 sq m which represents a gross to net area of circa 57%.

#### Suggested Scale and Turnover of Proposed District/Local Centre

7.49 Considering all of the above, we consider the following scale of development would deliver a District Centre of a scale that would be able to compete and be viable, would be broadly consistent with the range of District Centres found elsewhere in Warrington, consistent with the capacity exercise undertaken within this assessment, and reflective of the general retail market:

- Circa 2,800 sq m net main food supermarket (operated by either Morrisons, ASDA, Tesco, Sainsbury or Waitrose) (circa 4,300 sq m gross);
- Circa 900 sq m net discounter supermarket (operated by Aldi, Lidl, or Iceland) (circa 1,400 sq m gross);
- Circa 1,000 sq m net of comparison goods retailing (circa 1,250 sq m gross);
- Circa 1,000 sq m net of retail service and leisure goods floorspace (circa 1,250 sq m gross).

7.50 The benchmark turnover of the above floorspace is calculated in Table 3 at Appendix 4 and summarised below.

**Table 6.2: Benchmark Turnover of Suggested Retail and Leisure Development**

Turnover of Proposal	Convenience Turnover (£m)	Other Turnover (£m)	Total Turnover (£m)
Main Food Supermarket	25.6	6.1	31.7
Discount Supermarket	7.4	0.6	8.0
Comparison Units	0.0	6.3	6.3
Retail Service / Leisure Units	0.0	6.3	6.3
<b>Total Turnover</b>	<b>33.0</b>	<b>19.2</b>	<b>52.2</b>

- 7.51 It is worth highlighting at this stage that the above represents **44%** of the total retail and leisure expenditure generated by Phases 1-3 of the Garden Suburb and **31%** of the overall expenditure generated by Phases 1-4. As such, the suggested volume of retail and leisure floorspace at the District/Local Centre is entirely justified by the level of expenditure generated by new residents.
- 7.52 The convenience goods turnover generated reflects **100%** of the available convenience goods turnover generated by just Phases 1-3 of the Garden Suburb. With Phase 4 added, this reduces to **70%**. If the expenditure generated by the existing villages within the Garden Suburb area is accounted for, it reduces to **49%** (post Phase 4). In the context of the entire South Warrington area (with the Garden Suburb complete), it would represent just **27%** of the available convenience goods expenditure, and just **22%** if Lymm's existing expenditure is included too (and not accounting for any residential development in Lymm).
- 7.53 In short, the District/Local Centre would only need to capture approximately a quarter of the available convenience goods market share in the entire South Warrington conurbation based on the above suggested scale and format of development, which is not considered unreasonable and is in fact entirely plausible bearing in mind Stockton Heath District Centre is the only District Centre in the catchment area.
- 7.54 With regard to comparison goods, it is more difficult to calculate an accurate anticipated turnover. However, based on the above net floorspace figures and an indicative gross sales density of £5,000 per sq m, the turnover would equate to **£6m**. This equates to **8.4%** of the comparison goods expenditure generated by Phases 1-4 of the Garden Suburb proposals and **6.0%** of the comparison goods expenditure generated by the Garden Suburb and the existing villages within the boundary.
- 7.55 Notably, the existing comparison retail provision within Zone 9, including Stockton Heath District Centre captures **7%** of the comparison goods market share generated within this zone generating a turnover of **£16.6m** from the Nexus 2019 Study and an expected **£1.3m** inflow. This is based on circa 3,480 sq m gross comparison goods floorspace within Stockton District Centre (excluding comparison goods in the supermarkets), which therefore equates to a gross sales density of circa **£5,143**.
- 7.56 The above analysis would suggest that the proposed level and turnover of comparison floorspace would be broadly in keeping with the existing market and shopping patterns within the South

Warrington area. Even if the comparison floorspace was doubled, this is unlikely to generate any undue impacts once the Garden Suburb development is completed.

- 7.57 Furthermore, there is scope to capture a far greater level of the existing expenditure and market share available in the south of Warrington depending on the comparison goods retail offer provided. Indeed, it is noteworthy that there are no large-scale comparison goods retail units or a retail park located within South Warrington. The consequences of this coupled the level of provision provided to the north of Warrington means a significant number of existing residents within Zone 9 are travelling some distance to out of centre retail parks at Gemini Retail Park and elsewhere. In practice, there would be scope to retain a good proportion of this expenditure in the south of Warrington if a competitive and comparative offer was provided.
- 7.58 However, we recognise this would not necessarily be in keeping with the spirit of suggested District/Local Centre designation in the Garden Suburb and any trading and other impacts on Warrington Town Centre, Stockton Heath District Centre and perhaps other Neighbourhood and Local Centres would need to be thoroughly considered. As such, we have not presented such a scenario as part of this assessment.

#### *Worst Case Scenario Impact*

- 7.59 The phasing of the Garden Suburb set out in the development framework identifies that 930 dwellings will come forward within during Phase 1, with the District/Local Centre coming forward in Phase 2. Below we consider the impact of the entire District/Local Centre coming forward and trading at benchmark levels if only Phase 1 of the Garden Suburb coming forward. This would represent the worse case scenario.
- 7.60 The total benchmark turnover of the District/Local Centre at £52.2m is two and a half times the total expenditure generated by Phase 1 of the Garden Suburb (£21.2m).
- 7.61 £4.2m (13%) of the main food convenience goods turnover is met by the expenditure generated by the Phase 1 residents. If the proposed main food supermarket was to trade at benchmark levels, at worst £27.5m of **the main food supermarket's** trade will be diverted from the stores in the surrounding area. By enlarge the largest proportion of the trade would be drawn from Morrisons, Greenalls Avenue (£18.2m), **followed by Sainsbury's, Church Street (£3.6m)** and Aldi, Stockton Heath (£2.5m), all of which are currently significantly overtrading and would continue to do. The remaining £3.2 main food convenience goods turnover would be drawn from other stores within the area.
- 7.62 £1.8m (22%) of the discount supermarket goods turnover is met by the expenditure generated by the Phase 1 residents. If it was to trade at benchmark levels, £6.2m of the discount **supermarket's** trade will be diverted from the stores in the surrounding area. Unlike the main food shopping patterns, this trade is expected to be drawn more evenly from the stores within the surrounding area with the largest proportion of the trade drawn from Tesco Express, Knutsford

Road (£1.4m), followed by Morrisons, Greenalls Avenue (£0.8m) both of which are overtrading and will continue to do so.

- 7.63 Whilst each of the aforementioned stores would be impacted by the new District/Local Centre it is worth noting the recent appeal decision<sup>13</sup> for a new store in Shipson whereby the impact on the overtrading Co-op store in centre was noted to be between 40% to 52% although it was still expected to trade 7% over its benchmark post-development. In that instance the Inspector noted that there would clearly be an impact on the town centre, but the consequences were not such as should cause the appeal to be dismissed.
- 7.64 Trade would be drawing from other stores, some of which are under-trading such as Co-op, Appleton (£0.8m) and Co-op Knutsford Road (£0.4m). It should however be noted that these figures represent the worst case scenario on the basis that the surrounding stores would not benefit from the increase in convenience goods expenditure generated from the Garden Suburb whereas in reality these stores would benefit from some of the expenditure generated by the new residents.
- 7.65 Furthermore, this scenario is based on the new District/Local Centre trade at benchmark levels which is unlikely to be the case in reality. Whilst some customers may decide to change shopping patterns and shop at the District/Local Centre especially those who currently shop at the overtrading stores in the area, others would continue to shop more locally especially for their top up shopping at the smaller stores. In this scenario both the main food supermarket and discounter supermarket would trade below their benchmark, effecting their viability, and placing the importance of the next phases of the Garden Suburb coming forward to support the District/Local Centre.

#### *Best Case Scenario Impact*

- 7.66 Below we consider the impact of the District/Local Centre based on the entire Garden Suburb coming forward within the plan period, which would represent the best case scenario.
- 7.67 Of the convenience goods expenditure generated by the complete Garden Suburb, and assuming that the main food supermarket and discount supermarket were to trade at benchmark levels, there would be a £7.9m residual convenience goods expenditure, which would support the other smaller centres within the Garden Suburb.
- 7.68 Of the comparison goods the expenditure generated by the complete Garden Suburb, £6.3m would go to the comparison units within the District/Local Centre with £28.9m going to Warrington Town Centre and £4.5m to Stockton Heath District Centre assuming the same market shares within the Nexus 2019 Study are applied.

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<sup>13</sup> Paragraphs 28-42, APP/J3720/A/13/2194850 (see Appendix 5)

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7.69 Another significant benefit would be an additional £39.8m of expenditure for other retail and leisure services within the surrounding area some of which could be directed to the new Neighbourhood Centres and will be of significant benefit to Stockton Heath District Centre and Latchford District/Local Centre.

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## 8. CONCLUSIONS AND RECOMMENDATIONS

8.1 The NPPF makes clear that the objectively assessed needs for all development need to be considered in preparing a new local plan and that strategic policies should set out any overall strategy for the scale of retail development.

8.2 Neither the draft Local Plan, development framework or 2019 Nexus Study set the scale of floorspace that could be delivered within the District/Local Centre. To provide certainty to developers and ensure that the District/Local Centre comes forward in a timely manner the local plan should clearly set out a suitable scale for the retail and leisure elements of the proposed District/Local Centre. This assessment has been prepared to identify the suitable capacity for the District/Local Centre, based on the quantitative needs over the plan period (and beyond) as well as the qualitative case for additional facilities of this nature in this location.

8.3 It is demonstrated that the Garden Suburb has the scope to be a District Centre without generating any undue adverse impacts on existing centres within Warrington. This is by virtue of:

- The existing expenditure and retail capacity generated within the catchment area located to the south of the Manchester Ship Canal,
- The extent of evident overtrading in existing retail facilities within the catchment area,
- The level of new expenditure that will be generated by the Garden Suburb proposals and general growth within the area; and
- The limited geographical distribution of existing centres located to the south of Warrington. Indeed, there are no major supermarkets located to the south of the Ship Canal.

8.4 Equally, we recognise that the scale of the centre and its associated retail and main town centre use provision will also be strongly influenced by market demand and that may result in the delivery of a Local Centre. Either way we are firmly of the view that the main centre within the Garden Suburb should be **termed a District/Local Centre, and not 'Neighbourhood Centre'** and the smaller centres should be termed **Neighbourhood Centres/hubs and not 'Local Centres'**.

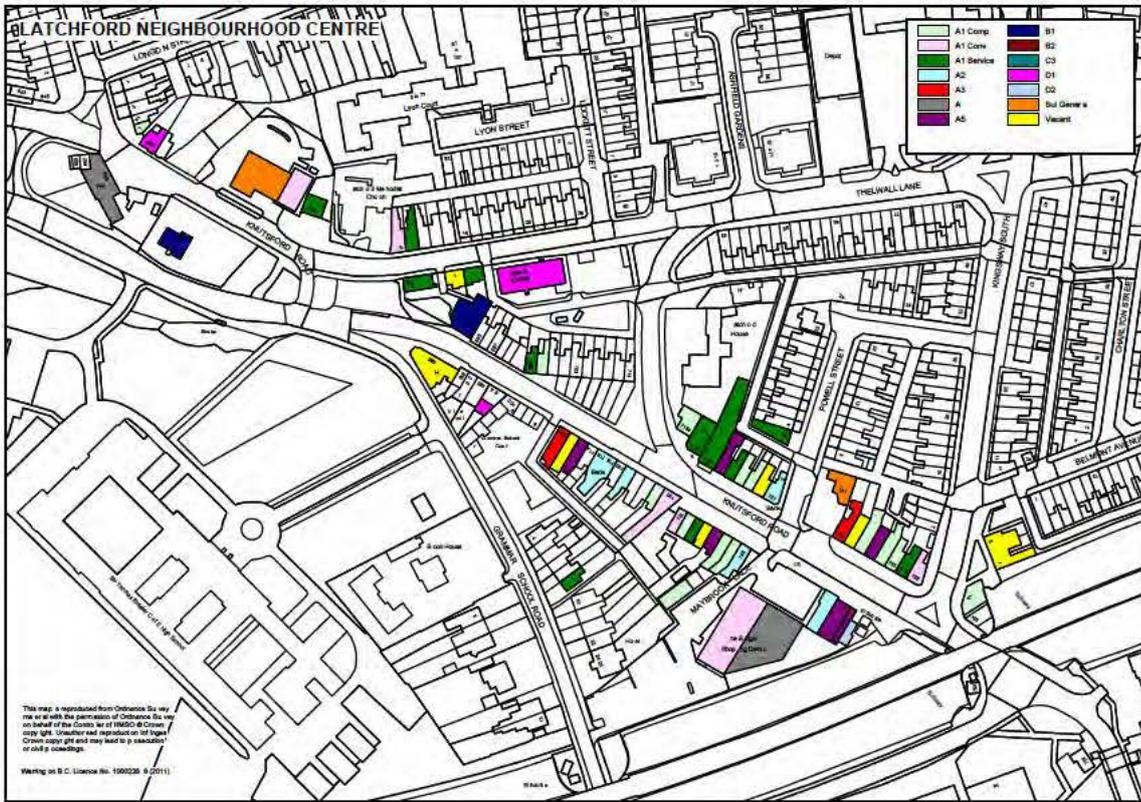
8.5 Policy MD2 sets out the general requirement for a **'Neighbourhood Centre'** to serve the whole of the Garden Suburb but fails to set a suitable scale of retail and leisure development. The requirement to demonstrate retail need would be necessary if a larger quantum of development is proposed. In this regard, based on the findings of this Retail & Town Centre Use Assessment and in line with the comments we have made to Policy DEV5, we recommend that Part 5f of the Policy MD2 is amended to:

*'A centrally located District/Local ~~Neighbourhood~~ Centre comprising a supermarket, local shops, 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.'*

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APPENDIX 1 – HEALTHCHECKS OF NEIGHBOURHOOD CENTRES AND LOCAL CENTRES

Latchford



Picture 4.7 Latchford Use Class Information



Picture 4.8 Latchford Neighbourhood Centre

Use Class	Units	%	Floorspace	% (Overall Floorspace)
A1 Comparison	15	25	1024	16
A1 Convenience	5	9	735	12
A1 Service	10	17	874	14
<b>All A1 Retail</b>	<b>30</b>	<b>51</b>	<b>1984</b>	<b>42</b>
A2	4	7	363	6
A3	4	7	622	10
A4	2	3	679	11
A5	5	9	355	5
B1	2	3	279	4
D1	2	3	353	6
D2	1	2	39	1
SU (Sui Generis)	2	3	399	6
Vacant	7	12	660	10
<b>Total</b>	<b>59</b>	<b>100</b>	<b>5824</b>	<b>100</b>

Table 9 Latchford Survey Results

**4.16** The shops are mainly located toward the junction of Knutsford Road and Kingsway South. The Bridge Shopping Centre comprises of one retail shop, the Co-op, whilst the rest are betting shops and food/drinking establishments. A1 retail units in Latchford make up nearly 51% of the total units with 17% being A1 service.

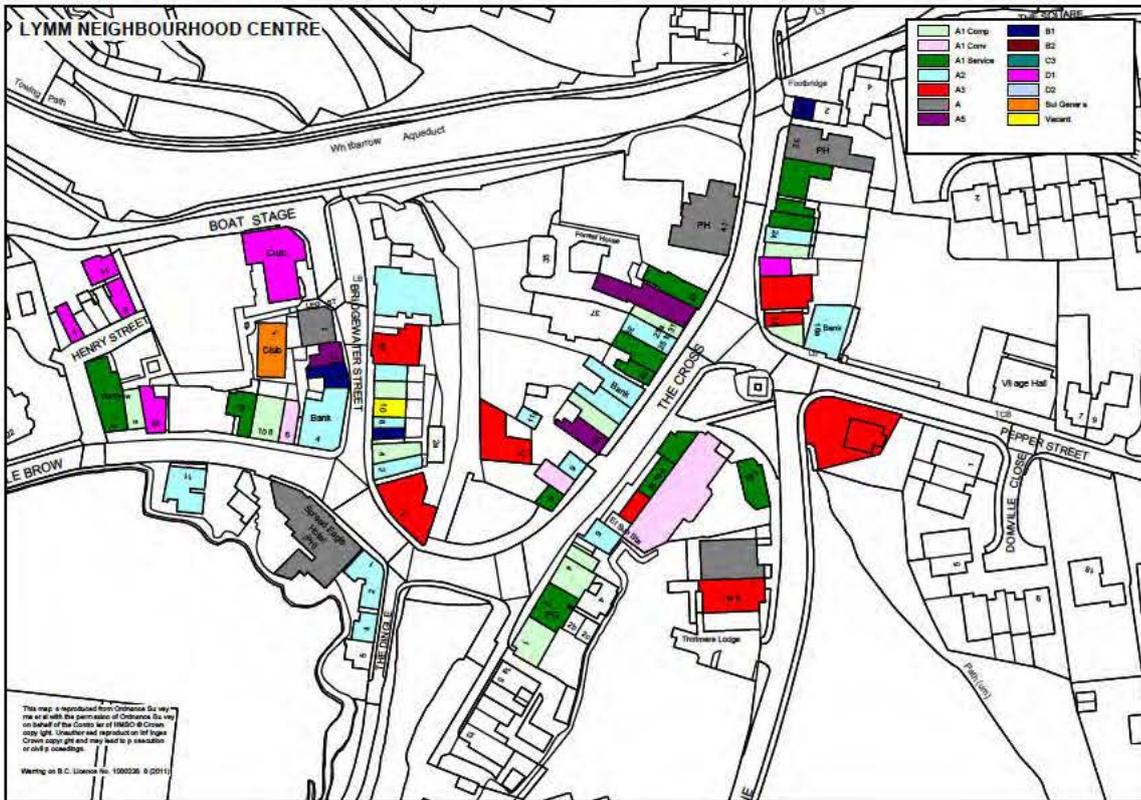
**4.17** Vacancy rates within the centre are relatively low, with 7 units out of a total 59 currently not occupied.

**4.18** Due to the meeting of the two main roads mentioned above, access to the site is car dominated. This creates poor overall environmental quality and accessibility for pedestrians and particularly cyclists.

**4.19** Much like Honiton Square and Fearnhead Cross, Latchford suffers from a dated feel when set apart from the Bridge Shopping Centre.

**4.20** Overall the centre provides a vital and vibrant centre. Although the centre contains a number of older units, the recent investment within Latchford has considerably lifted the environmental quality and this has reflected in the overall appearance and overall vitality and viability.

Lymm



Picture 4.11 Lymm Use Class Information



Picture 4.12 Lymm Neighbourhood Centre

Use Class	Units	%	Floorspace Area	% (Overall Floorspace)
A1 Comparison	11	17	745	13
A1 Convenience	3	5	479	9
A1 Service	13	20	884	16
<b>All A1 Retail</b>	<b>27</b>	<b>42</b>	<b>2108</b>	<b>38</b>
A2	15	23	1146	20
A3	6	9	735	13
A4	5	8	1008	18
A5	3	4	254	4
B1	3	4	108	2
D1	5	8	247	4
D2	0	0	0	0
SU (Sui Generis)	0	0	0	0
Vacant	1	2	43	1
<b>Total</b>	<b>65</b>	<b>100</b>	<b>5975</b>	<b>100</b>

Table 11 Lymm Survey Results

**4.25** The centre has a good proportion of A1 and other uses, particularly a high representation of financial/professional services (23%) with a number of banks in the village. There is a diverse range of use classes in the village, including lots of independently owned businesses.

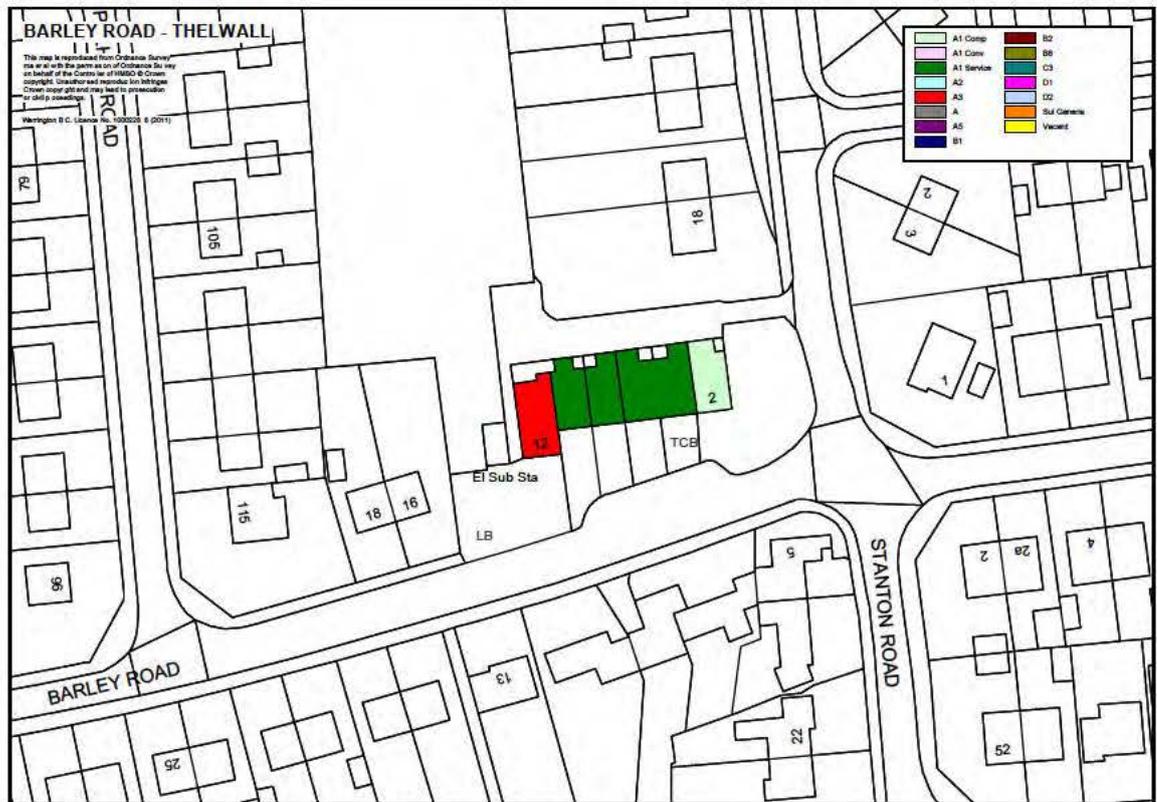
**4.26** Lymm has a low number of vacant units, with 1 unit (2%) out of a total of 65 currently unoccupied and no evidence of long term vacancies, which ensures that the centre remains healthy and vibrant.

**4.27** Due to the historic nature of the village, accessibility is generally poor. The narrow steep streets prevent buses from passing through the centre of the village. Nearby bus services depart every 30 minutes connecting the village to Altrincham and Warrington.

**4.28** There are only 3 cycle racks for the centre, located outside the Post Office. Pedestrian access is limited in some places by narrow streets, but wider in other areas. Cars generally pass slowly through the area allowing pedestrian flow. The village is extremely well kept with clean pavements and benches provided in the heart of the centre.

**4.29** Overall, Lymm Village provides a diverse range of uses that contribute to the success of the centre. Environmental quality is good however accessibility for pedestrians is generally poor.

Barley Road, Thelwall



Picture 5.1 Barley Road Use Class Information



Picture 5.2 Barley Road Local Centre

Use Class	Units	%	Floorspace Area	% (Overall Floorspace)
A1 Comparison	1	20	59	17
A1 Convenience	0	0	0	0
A1 Service	3	60	224	63
<b>All A1 Retail</b>	<b>4</b>	<b>80</b>	<b>283</b>	<b>80</b>
A2	0	0	0	0
A3	1	20	72	20
A4	0	0	0	0
A5	0	0	0	0
B1	0	0	0	0
D1	0	0	0	0
D2	0	0	0	0
SU (Sui Generis)	0	0	0	0
Vacant	0	0	0	0
<b>Total</b>	<b>5</b>	<b>100</b>	<b>355</b>	<b>100</b>

**Table 14 Barley Road Thelwall Survey Results**

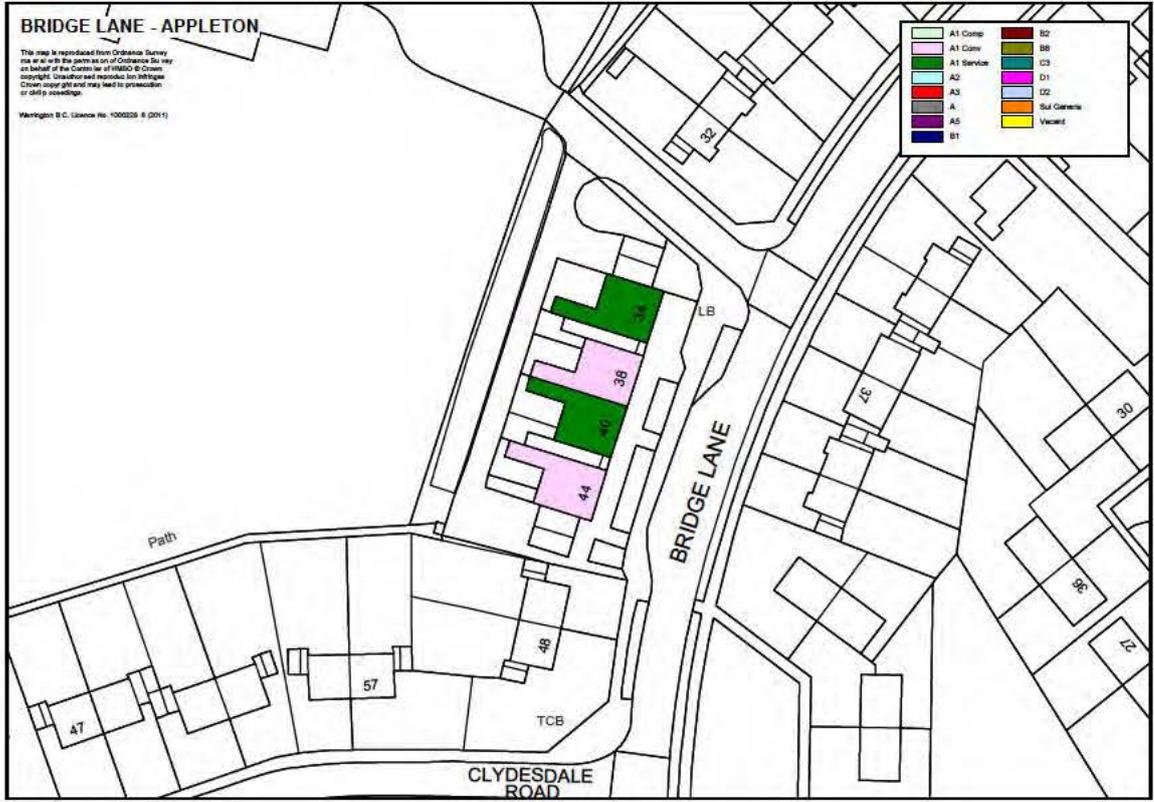
The Barley Road local centre has a small number of units grouped together. There are a total of five units, with 4 units being of A1 use class including a Post Office. Despite this high proportion of A1 units, there are no convenience units, units therefore fall into either comparison or service use class.

**5.1** There are no vacancies within the centre and parking is limited with visitors parking on the adjoining roads to visit the centre.

**5.2** Environmental quality is generally good with no graffiti or litter.

**5.3** Overall the centre provides a support mechanism for surrounding residents. The presence of a Post Office acts as a vital resource and adds to the general vitality. There are however no convenience uses and therefore this limits the diversification of the centre.

Bridge Lane, Appleton



Picture 5.3 Bridge Lane Use Class Information



Picture 5.4 Bridge Lane Use Class Information

Use Class	Units	%	Floorspace Area	% (Overall Floorspace)
A1 Comparison	0	0	0	0
A1 Convenience	2	50	188	50
A1 Service	2	50	187	50
<b>All A1 Retail</b>	<b>4</b>	<b>100</b>	<b>375</b>	<b>100</b>
A2	0	0	0	0
A3	0	0	0	0
A4	0	0	0	0
A5	0	0	0	0
B1	0	0	0	0
D1	0	0	0	0
D2	0	0	0	0
SU (Sui Generis)	0	0	0	0
Vacant	0	0	0	0
<b>Total</b>	<b>4</b>	<b>100</b>	<b>375</b>	<b>100</b>

**Table 15 Bridge Lane Appleton Survey Results**

**5.4** Bridge Lane Local Centre is a small centre with four units. The units comprise of both convenience and service based units. There are no vacancies and the environmental quality of the centre is average.

**5.5** Parking within the centre is limited with residents parking on the main and surrounding side roads.

**5.6** Overall the centre provides a reasonable diverse range of uses within a local centre. There are no vacancies and environmental quality is average.

Dudlows Green Road



Picture 5.19 Dudlows Green Road Use Class Information



Picture 5.20 Dudlows Green Use Class Information

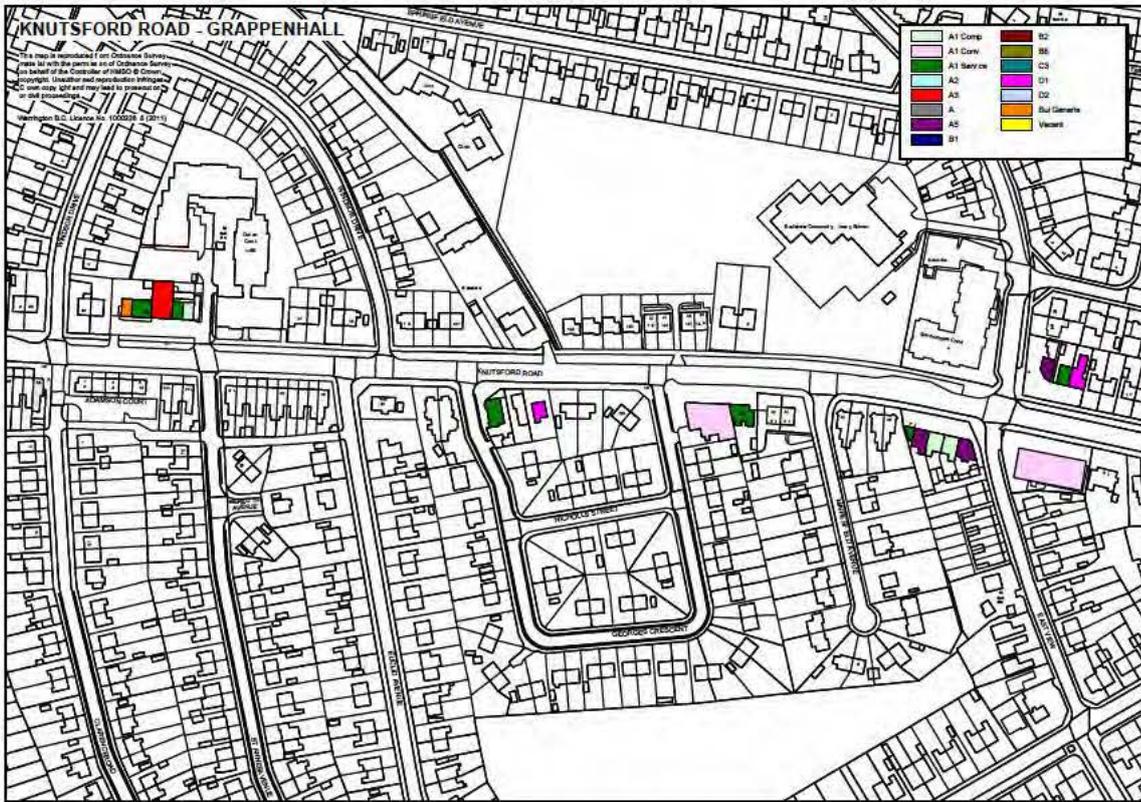
Use Class	Units	%	Floorspace Area	% (Overall Floorspace)
A1 Comparison	0	0	0	0
A1 Convenience	1	25	92	30
A1 Service	0	0	0	0
<b>All A1 Retail</b>	<b>1</b>	<b>25</b>	<b>92</b>	<b>30</b>
A2	0	0	0	0
A3	0	0	0	0
A4	0	0	0	0
A5	0	0	0	0
B1	0	0	0	0
D1	3	75	210	70
D2	0	0	0	0
SU (Sui Generis)	0	0	0	0
Vacant	0	0	0	0
<b>Total</b>	<b>4</b>	<b>100</b>	<b>302</b>	<b>100</b>

Table 23 Dudlow Green Road Survey Results

**5.22** Dudlows Green local centre contains one A1 unit and three D1 units, with no vacancies. The proportion of A1 floorspace accounts for 30% of the total floor area and therefore provides a good proportion of A1 use whilst the convenience food store is of sufficient size to support the local area. Environmental quality within the centre is good and ample off-street parking is provided to the rear of the units.

**5.23** Overall, whilst the centre has only four units, the availability of a convenience store ensures that it remains vibrant and serves the immediate locality well.

### Knutsford Road, Grappenhall



Picture 5.41 Knutsford Road Use Class Information



Picture 5.42 Knutsford Road Grappenhall

Use Class	Units	%	Floorspace Area	% (Overall Floorspace)
A1 Comparison	4	21	266	13
A1 Convenience	2	11	842	40
A1 Service	6	32	395	19
<b>All A1 Retail</b>	<b>12</b>	<b>64</b>	<b>1503</b>	<b>72</b>
A2	0	0	0	0
A3	1	5	184	9
A4	0	0	0	0
A5	3	16	203	10
B1	0	0	0	0
D1	2	11	145	7
D2	0	0	0	0
SU (Sui Generis)	1	5	43	2
Vacant	0	0	0	0
<b>Total</b>	<b>19</b>	<b>100</b>	<b>2078</b>	<b>100</b>

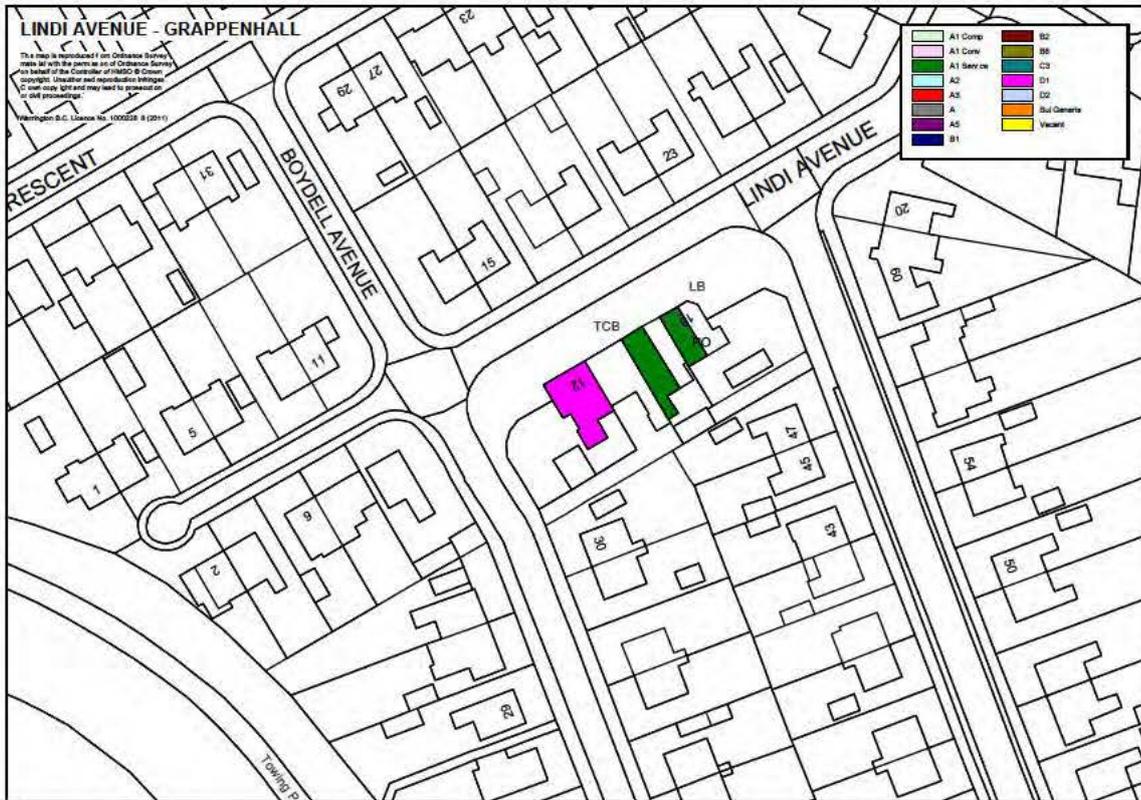
**Table 34 Knutsford Road Grappenhall Survey Results**

**5.48** The Grappenhall local centre on Knutsford Road has a wide variety of units and offers an essential base for local residents. The units are sporadic in nature and are positioned along both sides of the main road. 64% of the total units are of A1 use class including four A1 comparison, two A1 convenience and six A1 service. This proportion amounts to 72% of the total floorspace. There are currently no vacancies within the centre.

**5.49** The centre has good accessibility due to its location on a busy main road and has a well serviced by a local bus route. Whilst this is the case, the centre generally suffers from poor parking provision and therefore parking is only available on small residential roads surrounding the centre.

**5.50** Overall the Grappenhall local centre provides a diverse range of uses that contribute to the centres overall vitality and viability.

### Lindi Avenue, Grappenhall



Picture 5.43 Lindi Avenue Use Class Information



Picture 5.44 Lindi Avenue Local Centre

Use Class	Units	%	Floorspace Area	% (Overall Floorspace)
A1 Comparison	0	0	0	0
A1 Convenience	0	0	0	0
A1 Service	2	67	81	52
<b>All A1 Retails</b>	<b>2</b>	<b>67</b>	<b>81</b>	<b>52</b>
A2	0	0	0	0
A3	0	0	0	0
A4	0	0	0	0
A5	0	0	0	0
B1	0	0	0	0
D1	1	33	76	48
D2	0	0	0	0
SU (Sui Generis)	0	0	0	0
Vacant	0	0	0	0
<b>Total</b>	<b>3</b>	<b>100</b>	<b>157</b>	<b>100</b>

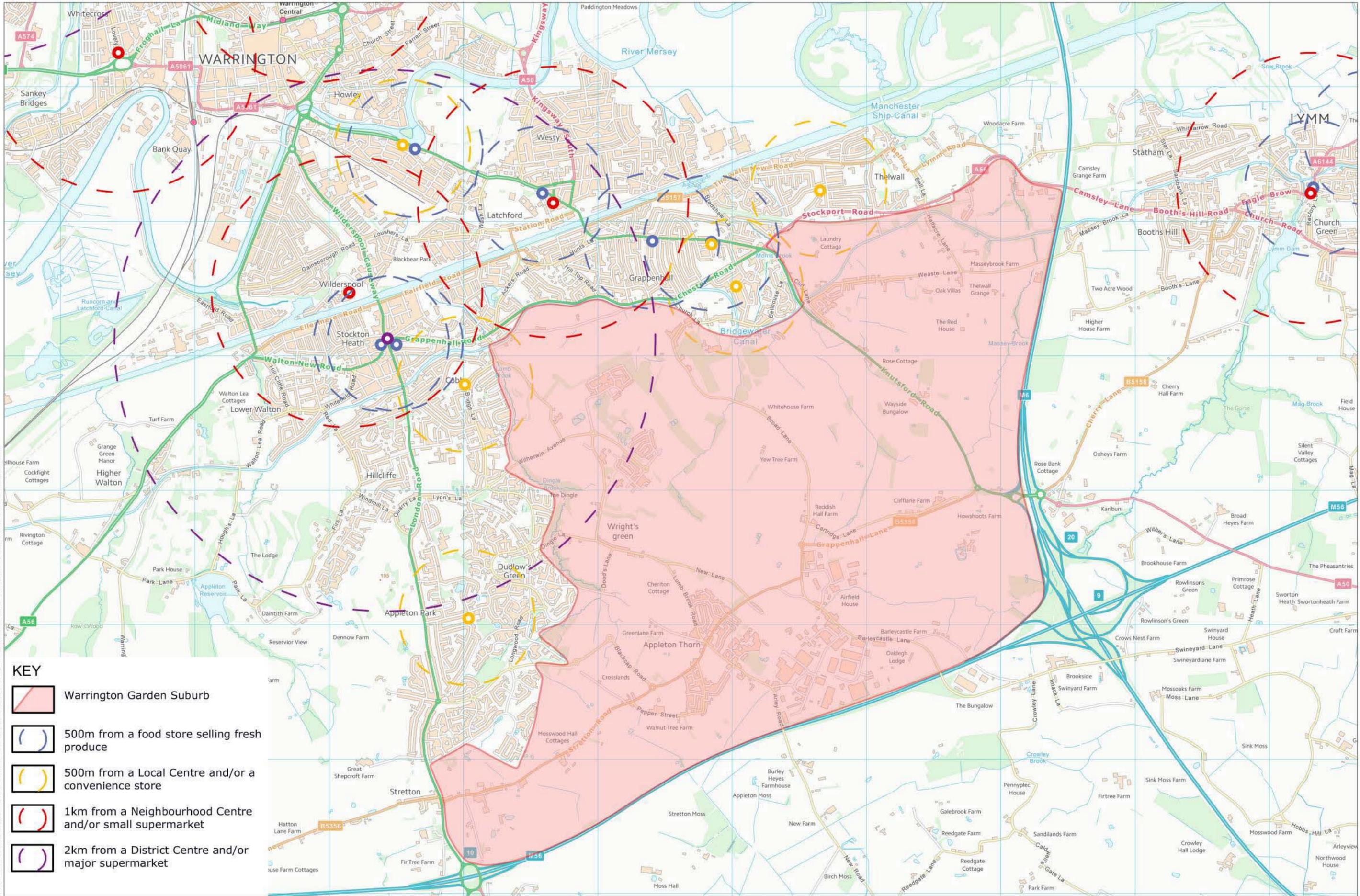
**Table 35 Lindi Avenue Survey Results**

**5.51** Lindi Avenue is a small local centre which serves the immediate locality and is positioned in close proximity to the Knutsford Road local centre. There are three units including two A1 units and one D1 unit. Although the centre does not contain a A1 convenience store the presence of a post office lends itself to provide a valuable resource for local residents.

**5.52** Parking is limited with visitors generally parking on-street. There are no vacancies and environmental quality is good.

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APPENDIX 2 – EXISTING RETAIL CATCHMENT PLAN

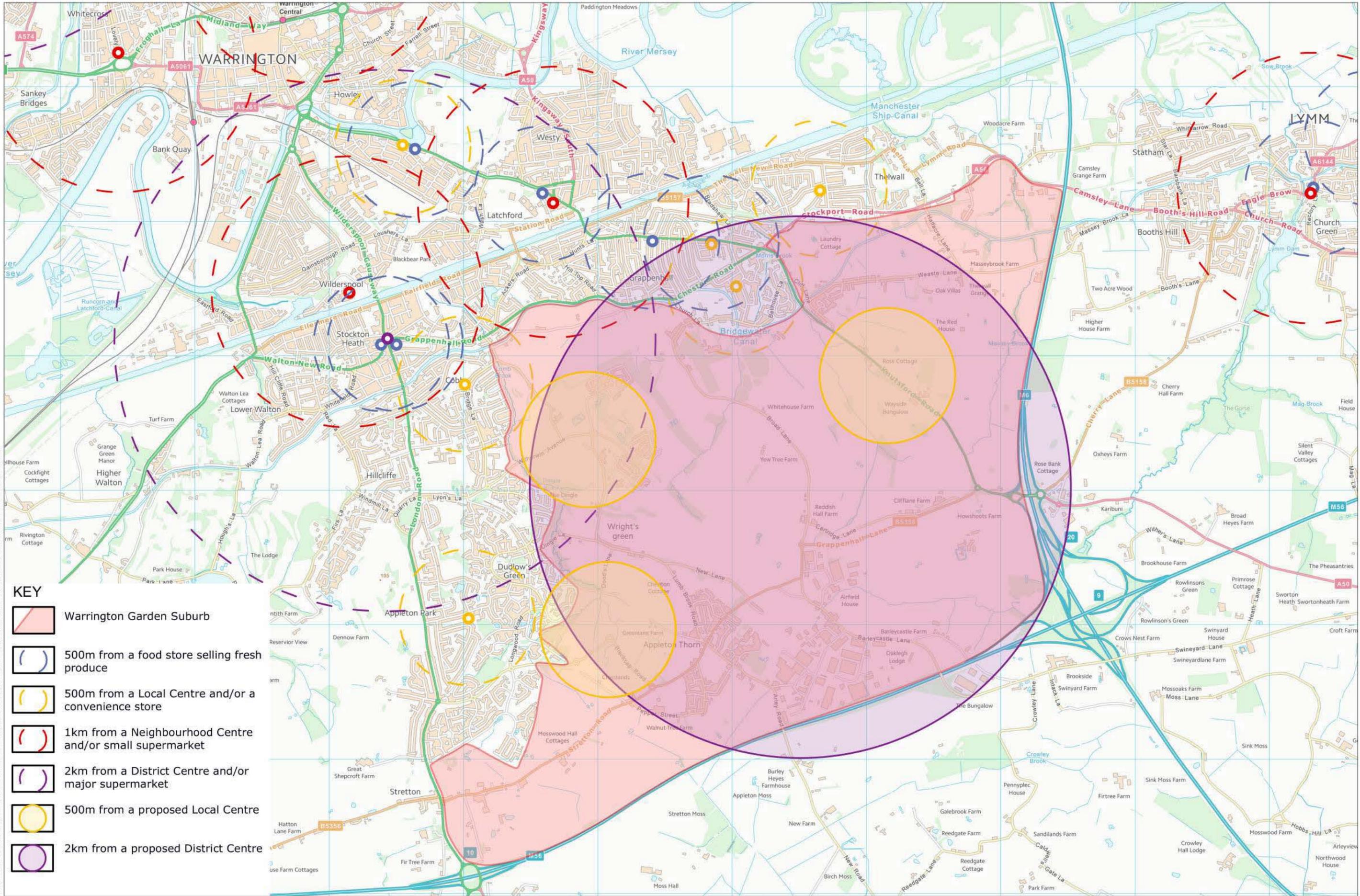


- KEY**
- Warrington Garden Suburb
  - 500m from a food store selling fresh produce
  - 500m from a Local Centre and/or a convenience store
  - 1km from a Neighbourhood Centre and/or small supermarket
  - 2km from a District Centre and/or major supermarket

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APPENDIX 3 – PROPOSED RETAIL CATCHMENT PLAN



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APPENDIX 4 – TABLES

Table 1: Capacity Assessment

Existing Area / Phase of Proposal	Nexus Zones 2019 Figures				Pegasus Zones 2019 Figures			Garden Suburb Proposal					POST DEVELOPMENT			
	Zone 9 Stockton Heath / Grappenhall	Zone 5 Stretton / Rural South	Total South Warrington	Zone 10 Lymm	Existing South Warrington Urban and Rural Area (Parish)	Lymm Parish	Existing South Warrington Rural Area (LSOA)	Phase 1	Phase 2	Phase 3	Total Garden Suburb During Plan Period	Phase 4	Total Garden Suburb	Total Garden Suburb with Existing Villages	Total South Warrington With Garden Suburb	Total South Warrington With Garden Suburb + Lymm
<b>Population &amp; Households</b>																
1a. Population	35,913	3,572	39,485	13,620	29,978	12,350	6,681	2,418	7,272	3,861	13,551	5,741	19,292	25,973	49,270	61,620
1b. Number of Dwellings 2011					12,058	5,171	2,485	930	2,797	1,485	5,212	2,208	7,420	9,905	19,478	24,649
1.c Average Household Size (2.4 in UK)					2.5	2.4	2.7	2.6	2.6	2.6		2.6				
<b>Convenience Goods</b>																
2a. Convenience Per Capita Expenditure 2018	2,422	2,911		2,478	2,466	2,478	2,911	2,469	2,469	2,469		2,469				
2b. Convenience Expenditure Generated (£m)	£86.98	£10.40	£97.38	£33.75	£73.93	£30.60	£19.45	£5.97	£17.96	£9.53	£33.46	£14.18	£47.6	£67.09	£121.57	£152.17
2c. Main Food Convenience Expenditure Generated	£60.89	£7.28	£68.17	£23.63	£51.75	£21.42	£13.61	£4.18	£12.57	£6.67	£23.42	£9.92	£33.3	£46.96	£85.10	£106.52
2d. Top Up Convenience Expenditure Generated	£26.09	£3.12	£29.21	£10.13	£22.18	£9.18	£5.83	£1.79	£5.39	£2.86	£10.04	£4.25	£14.3	£20.13	£36.47	£45.65
<b>Comparison Goods</b>																
2e. Comparison Per Capita Expenditure 2018	3,746	4,681		4,081	3,831	4,081	4,681	3,895	3,895	3,895		3,895				
2f. Comparison Expenditure Generated (£m)	£134.53	£16.72	£151.25	£55.58	£114.83	£50.40	£31.27	£9.42	£28.32	£15.04	£52.78	£22.36	£75.1	£106.41	£189.97	£240.37
<b>Retail and Professional Services (A1 Other and A2)</b>																
3a. Average Weekly A1 Other / A2 Household Spend	No data provided by Nexus Warrington Retail and Leisure Study Update 2019				£75	£72	£81	£78	£78	£78		£78				
3b. Annual Expenditure Generated (£m)					£47.1	£19.4	£10.5	£3.8	£11.4	£6.0	£21.2	£9.0	£30.1	£40.62	£77.23	£96.59
<b>Food and Drink (A3-A5 Uses)</b>																
3c. Average Weekly Food & Drink Household Spend (adjusted by household size)	No data provided by Nexus Warrington Retail and Leisure Study Update 2019				£40	£38	£43	£41	£41	£41		£41				
3d. Annual Expenditure Generated (£m)					£24.8	£10.2	£5.5	£2.0	£6.0	£3.2	£11.2	£4.7	£15.9	£21.41	£40.70	£50.92
<b>TOTAL HOUSEHOLD EXPENDITURE FOR TYPICAL TOWN CENTRE USES</b>																
					£261	£111	£67	£21	£64	£34	£119	£50	£168.8	£235.52	£429.47	£540.06
<b>Broad Convenience Goods Floorspace Densities (£ / sq m)</b>																
4a. Main Food Supermarket	12,949	12,949	12,949	12,949	12,949	12,949	12,949	12,949	12,949	12,949	12,949	12,949	12,949	12,949	12,949	12,949
4b. Discount Supermarket	9,263	9,263	9,263	9,263	9,263	9,263	9,263	9,263	9,263	9,263	9,263	9,263	9,263	9,263	9,263	9,263
4c. Convenience Store	11,697	11,697	11,697	11,697	11,697	11,697	11,697	11,697	11,697	11,697	11,697	11,697	11,697	11,697	11,697	11,697
<b>Scenario 1 - Broad Convenience Goods Floorspace Capable of being supported (sq m net)</b>																
5a. Main Food Convenience Goods Floorspace Supported	4,702	562	5,264	1,825	3,997	1,654	1,051	323	971	515	1,809	766	2,575	3,627	6,572	8,226
5c. Top Up Floorspace Supported	2,231	267	2,498	866	1,896	785	499	153	461	245	858	364	1,222	1,721	3,118	3,903
<b>Scenario 2 - Broad Convenience Goods Floorspace Capable of being supported (sq m net)</b>																
5a. Main Food Convenience Goods Floorspace Supported (assumed 80% of Main Food Expenditure)	3,762	450	4,211	1,460	3,197	1,324	841	258	777	412	1,447	613	2,060	2,901	5,258	6,581
5b. Discount Convenience Floorspace Supported (assumed 20% Main & 20% Top up)	1,878	225	2,103	729	1,596	661	420	129	388	206	722	306	1,029	1,448	2,625	3,286
5c. Convenience Store Floorspace Supported (assumed 80% Top Up)	1,785	213	1,998	692	1,517	628	399	123	368	196	687	291	977	1,376	2,494	3,122

**Guide on floorspace**

Morrisons Stockton Heath is 2,958 sq m conv net

Aldi Stockton Heath is 594 sq m conv net

Tesco Express / Sainsbury's Local typically 250 sq m conv net to allow for Sunday trading (+30 sq m typically for day to day comparison goods like shampoo, toilet paper, etc)

**Notes:**

Zones and Areas: Used Zones 5, 9 and 10 from Nexus Warrington Retail and Leisure Study 2019 and Parish Areas of Stockton Heath, Grappenhall & Thelwall, Appleton, Stretton and Walton And Lower Super Output areas of Warrington 022D (Grappenhall), 024A (Appleton Thorne), 024B (Weaste Lane) and 024D (Stretton and Hatton) for rural area.

1a - Population taken from Nexus Warrington Retail and Leisure Study 2019, Appendix 4, Table 1 for Zones 5, 9 and 10. Population for Parish and LSOA taken from 2011 Census. data. Population for Garden Suburb based on nos of dwellings x 2.5 average household size

1b - Nos of dwellings for Parish Areas and LSOAs based on 2011 Census data. Nos of dwellings and phases for Garden Suburb based on notes from meeting with Warrington & Co and Aecom, July 2018

1c - Household size for Parish and LSOA based on 2011 Census data. Used average household size of 2.6 for Garden Suburb proposals based on data for surrounding area.

2a - 2018 per capita convenience expenditure figures taken from Appendix 4, Table 1, Nexus Warrington Retail and Leisure Study 2019 (2017 Prices)

2b - Based on ONS Average Household Expenditure Figures 2018 and adjusted to local household size (2.6 for Garden Suburb)

2c - Convenience goods expenditure generated calculated by multiplying population (or households) x relevant expenditure figure. Used households and 2017 rates for Garden Suburb Proposal

2d - Assumed 70% pf convenience goods expenditure is used for 'Main Food' shopping.

2e - Assumed 30% of total convenience goods expenditure is used for 'Top Up' shopping

2f - 2018 per capita comparison expenditure figures taken from Appendix 4, Table 7c, Nexus Warrington Retail and Leisure Study 2019 (2017 Prices)

3a - Based on ONS Average Household Expenditure Figures, 2018 and adjusted to local household size (2.6 for Garden Suburb)

3b - Retail and Professional services expenditure generated calculated by multiplying households x expenditure figure.

3c - Based on ONS Average Household Expenditure Figures, 2018 and adjusted to local household size (2.6 for Garden Suburb)

3d - Food & Drink services expenditure generated calculated by multiplying households x expenditure figure.

4a - Main Food Supermarket Sales Density based on average for Tesco, Sainsburys, Morrisons, ASDA and Waitrose from Verdict 2018 data (VAT applied)

4b - Discounter Sales Density based on average of Aldi, Lidl and Iceland from Verdict 2018 data (VAT applied)

4c - Top up sales density based on average of Co-op, M&S Food, Tesco and Sainsburys from Verdict 2018 data (VAT applied)

Table 2: Do-nothing Scenario - Impact on Incumbent Stores

Store	Existing			Post Completion of Phases 1 Garden Suburb				Post Completion of Phases 1-3 Garden Suburb				Post Phase 4 Garden Suburb			
	Current Benchmark Trading Position	Current Turnover	Comparison with Benchmark	Trade Draw from GS	Overtrading	Comparison with Benchmark	Increase Trading	Trade Draw from GS	Overtrading	Comparison with Benchmark	Increase Trading	Trade Draw from GS	Overtrading	Comparison with Benchmark	Increase Trading
<b>Zone 6</b>															
Aldi, Crosfield Street	£6.2	£21.6	348%	£0.1	£15.5	350%	2%	£0.6	£16.0	358%	10%	0.3	16.3	363%	4%
Asda, Cockhedge Way	£39.9	£17.8	45%	£0.1	-£22.0	45%	0%	£0.8	-£21.3	47%	2%	0.3	-21.0	47%	1%
Co-op, Latchford	£3.3	£1.4	42%	£0.0	-£1.9	44%	1%	£0.2	-£1.7	50%	7%	0.1	-1.6	53%	3%
Lidl, Latchford	£7.2	£5.5	76%	£0.1	-£1.6	77%	1%	£0.4	-£1.3	82%	5%	0.2	-1.2	84%	2%
Sainsbury's, Church Street	£30.8	£53.0	172%	£0.6	£22.8	174%	2%	£3.2	£25.4	182%	10%	1.3	26.7	187%	4%
Tesco Extra, Winwick Road	£53.4	£36.4	68%	£0.2	-£16.8	68%	0%	£1.0	-£16.0	70%	2%	0.4	-15.6	71%	1%
<b>Zone 9</b>															
Aldi, Stockton Heath	£6.1	£14.8	243%	£0.5	£9.2	251%	9%	£3.0	£11.7	292%	49%	1.3	13.0	313%	21%
Co-op, Appleton	£4.1	£3.3	80%	£0.2	-£0.6	86%	6%	£1.3	£0.5	112%	32%	0.6	1.1	126%	13%
Co-op, Knutsford Road	£3.6	£2.5	69%	£0.1	-£1.0	73%	3%	£0.7	-£0.4	89%	19%	0.1	-0.3	91%	2%
Morrisons, Greenalls Avenue	£34.2	£64.2	188%	£3.0	£33.0	197%	9%	£16.8	£46.8	237%	49%	7.1	54.0	258%	21%
Sainsbury's Local, Stockton Heath	£2.9	£0.8	28%	£0.1	-£2.0	29%	2%	£0.3	-£1.8	37%	10%	0.1	-1.7	42%	4%
Stockton Heath	£0.2	£0.2	100%	£0.0	£0.0	107%	7%	£0.1	£0.1	141%	41%	0.0	0.1	159%	18%
Tesco Express, Knutsford Road	£2.5	£5.7	228%	£0.4	£3.6	245%	17%	£2.4	£5.6	324%	96%	1.0	6.6	365%	41%

Table 3: Benchmark Turnover

Turnover of Proposal	Gross Floorspace	Net Ratio	Net Floorspace	Convenience Ratio	Net Convenience Floorspace	Net Comparison Floorspace	Convenience Sales Density (£/sqm)	Comparison Sales Density (£/sqm)	Convenience Turnover	Comparison Turnover	Total Turnover
Main Food Supermarket	4300	65%	2795	71%	1976	819	12,949	7,458	£25.6	£6.1	£31.7
Discounter Supermarket	1400	65%	910	88%	797	113	9,263	5,224	£7.4	£0.6	£8.0
Comparison Units	1250	80%	1000	0%	0	1000	0	5000	£0.0	£6.3	£6.3
Retail Services / Leisure Units	1250	80%	1000	0%	0	1000	0	5000	£0.0	£6.3	£6.3
<b>TOTAL TURNOVER</b>	<b>8200</b>		<b>5705</b>		<b>2773</b>	<b>2932</b>			<b>£33.0</b>	<b>£19.2</b>	<b>£52.2</b>

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APPENDIX 5 – SHIPSTON APPEAL DECISION (APP/J3720/A/13/2194850)

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## Appeal Decision

Inquiry held on 1 – 2 October 2013, 8 – 11 and 15 July 2014

Site visit made on 15 July 2014

**by Phillip J G Ware BSc(Hons) DipTP MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 23 February 2015**

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**Appeal Ref: APP/J3720/A/13/2194850**

**Land north of Campden Road, Shipston-on-Stour, Warwickshire**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
  - The appeal is made by Ainscough Strategic Land against the decision of Stratford on Avon District Council.
  - The application Ref 12/00403/OUT, dated 14 February 2012, was refused by notice dated 28 January 2013.
  - The development proposed is a supermarket (Use Class A1) with associated petrol station, customer parking and servicing; an 'extra care' retirement development (Use Class C2) comprising up to 80 cottages and 50 apartments with associated care and staff facilities; up to 54 residential dwellings (including 35% affordable housing provision) (Use Class C3); a community use (Use Class D1/D2); and associated access arrangements, open space, allotments and landscaping.
- 

### Procedural matters

1. The application is in outline, with only access to be considered at this stage, along with the principle of the development. The proposal as considered at the Inquiry was supported by an indicative Masterplan and a series of parameter plans<sup>1</sup>.
2. The Inquiry was adjourned on 2 October 2013, following representations by the Council, the appellant and those representing the Co-operative Group (the Co-op) to enable an Environmental Impact Assessment (EIA) Screening Direction to be made by the Secretary of State. On 12 November 2013 the Secretary of State directed that the proposal was EIA development under the 2011 Regulations. An Environmental Statement (ES) was submitted in January 2014<sup>2</sup>. There has been no suggestion that the ES does not meet the requirements of the Regulations and the ES has been taken into account in this decision.
3. The Co-op are a Rule 6 party and played a full role in the early stages of the Inquiry and in particular during consideration of the retail issue. They were not involved in the landscape issue. The 2014 sessions of the Inquiry considered retail matters first and, as agreed, the Co-op did not participate in subsequent sessions of the Inquiry. All parties agreed that the closing statement on behalf

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<sup>1</sup> Listed at Section 4 and Appendices 4 and 5 of Document 5

<sup>2</sup> Core document ASL 8.33

of the Co-op<sup>3</sup> should be submitted in writing, and that the Appellant would respond in writing<sup>4</sup>.

4. During the 2014 sessions of the Inquiry, the outstanding appeal related to land on the opposite side of Campden Road was discussed (the 'Banner Homes site'). The proposal was for up to 70 dwellings with public open space, landscaping and related works. The appeal decision<sup>5</sup> was issued on 4 August 2014 and planning permission was granted. The parties were then given the opportunity to comment, and the Council and the appellant did so<sup>6</sup>. Their responses have been considered.
5. After the Inquiry closed in July 2014, the position of the Council changed in relation to the housing land supply situation in the District. In the light of this it had been the intention to reopen the Inquiry. However the Council's position changed again, and the matter was resolved by written submissions. This issue is discussed below.

### **Decision**

6. The appeal is allowed and planning permission is granted for a supermarket (Use Class A1) with associated petrol station, customer parking and servicing; an 'extra care' retirement development (Use Class C2) comprising up to 80 cottages and 50 apartments with associated care and staff facilities; up to 54 residential dwellings (including 35% affordable housing provision)(Use Class C3); a community use (Use Class D1/D2); and associated access arrangements, open space, allotments and landscaping; all on land north of Campden Road, Shipston-on-Stour, Warwickshire in accordance with the terms of the application, Ref 12/00403/OUT, dated 14 February 2012, subject to the conditions set out in the Annex to this decision.

### **Main issues**

7. The Council's reasons for refusal included matters related to layout and parking, and the location of the Extra Care accommodation. The Council and the appellants now agree that these matters can be addressed by conditions and the submitted Planning Obligation. There was also a reason for refusal related to the absence of a Planning Obligation dealing with infrastructure provision at that stage – which has since been addressed.
8. With that background there are two main issues in this case:
  - The impact of the proposed supermarket on the vitality and viability of Shipston town centre.
  - The effect of the proposal on the character and appearance of the area, including the setting of Shipston and the surrounding countryside.

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<sup>3</sup> C1

<sup>4</sup> APP5

<sup>5</sup> APP/J3720/A/14/2217247 Document 18

<sup>6</sup> Documents 19 & 20

## Reasons

### ***The area***

9. The site is located just to the west of the defined area of Shipston, on the north side of the B4053 – the main road into the town from the west. The land comprises two fields divided by a hedgerow. The site slopes up from the road at about 79 metres AOD, to 101 metres AOD in the northeast corner.
10. Further along the road to the west is the former IMI Norgren works, now to be developed by Cala Homes (the 'Cala Homes site'). Planning permission has been granted for the redevelopment of that site for 102 residential units and 929 sq.m of employment units. On the opposite side of the road is the Banner Homes site, referenced above.

### ***Policy background***

11. There are some background policy issues which are of relevance to both main issues. The development plan comprises the saved policies of the Stratford-on-Avon Local Plan Review 1996 – 2001 (2006) (LP). There are a range of policies applicable to the proposal as a whole<sup>7</sup>, but more specifically COM.19 refers to the retail issue and PR.1 and DEV.2 are relevant to the landscape issue.
12. LP COM19 is agreed by the Council and the appellant to be inconsistent with national policy in that it includes a needs test. There was some debate as to whether some other parts of the policy remain in accordance with the National Planning Policy Framework (the Framework) but, taken as a whole, it is clear that the policy is out of date, and that the determinative retail policy is that in the Framework (especially at paragraphs 24, 26 and 27).
13. Shipston is a Main Rural Centre in the LP, one of eight designated in this manner. The LP notes that due to the size of the District and its rural nature these settlements are essential in supporting a wide range of jobs and facilities for their own residents and people living in smaller villages nearby. Shipston, being located in the southern part of the District, serves a number of surrounding villages within and outside the administrative area<sup>8</sup>.
14. The Council's emerging Core Strategy has moved through various iterations before reaching its current position – namely that it is being examined. The details of the history of the emerging plan are set out in the Planning Statement of Common Ground<sup>9</sup>. The emerging Core Strategy, to which limited weight can be given at present, adopts a not dissimilar approach to the LP in relation to landscape.
15. The appeal site was included within a wider area as a proposed allocation in earlier iterations (2008 and 2010) of the emerging CS, but was not included in the 2012 version or subsequently. The Council explained the removal of the site in 2012 based on the Strategic Housing Land Availability Assessment (2012) and the results of the Council's Landscape Sensitivity Study.

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<sup>7</sup> Set out in Document 12 Section 5

<sup>8</sup> Document 12 Appendix 6 lists the range of services in the town

<sup>9</sup> Document 12

## **The effect on the vitality and viability of Shipston town centre**

### *Background retail considerations and agreed matters*

16. Shipston is a traditional market town with a number of small shops clustered around the Market Place and on the roads leading into it. It is unusual, though apparently not unique, in having two Co-op stores in close proximity, a situation which has prevailed since the Co-op acquired Somerfield premises in 2008. The larger Co-op store (TCG) was in the process of being expanded and improved at the time of the Inquiry in 2014 – with completion due in late 2014. TCG were fully represented at the Inquiry in opposition to the proposal. The smaller store is operated by Mid Counties Co-op, who have not made representations. The two Co-op stores are very similar in appearance and offer, and it is unlikely that many members of the public would appreciate the difference in ownership and operation.
17. Although Shipston does not have a defined town centre in the LP, the Market Place may reasonably be taken as the hub of the town. The appeal site is some 720 metres from this location (or 625 metres from the town centre boundary shown on the draft CS). On that basis, the parties<sup>10</sup> agree that the appeal site is out of centre as defined in the Framework.
18. The proposed supermarket would comprise 1,800 sq.m. net floorspace (2,499 sq.m. gross), divided between 1,500 sq.m. for convenience goods and the remaining 300 sq.m. for comparison goods. The size of the store would be such that it would clearly cater for main food trips and act as a top up destination. This is agreed by the parties.
19. It is clear that, in principle, a new supermarket in Shipston is not inconsistent with the position of the town in the District's retail hierarchy. There is no doubt that the appellant has tested all site options and adopted a sufficiently flexible approach towards possible accommodation of the appeal proposal in the town centre – without success. The parties agree that there are no suitable and available sequentially preferable sites, and this did not form part of the case of any party. Based on the evidence, there is no reason to disagree with this position, and that element of paragraph 27 of the Framework is met.
20. A considerable amount of background material, including the location of existing and committed facilities in the area, population figures, and expenditure, has been agreed by the parties and is set out in the Retail Statement of Common Ground<sup>11</sup>. It is not proposed to rehearse these matters here, but some matters are of note. In particular the Study/Survey area was agreed, as was the extent of zones around the town. The benchmark turnover of the proposed supermarket has been agreed, as has the company average sales density for the Co-op convenience goods floorspace.

### *Historical changes to emerging retail policy*

21. No party placed any great weight in policy terms on the earlier iterations of the CS, but there is some merit in the argument that the positive approach of the Council (illustrated by former draft CS policy Ship 1) towards the need for an improvement in the retail offer in Shipston was soundly based on the Colliers

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<sup>10</sup> In this section, 'the parties' includes the Co-op

<sup>11</sup> Document 11

2008 Study<sup>12</sup>. This Study identified a capacity for a 2,500 sq.m. store and, though criticised for the absence of an impact assessment (probably explained by the lack of a specific proposal to assess), appears to have been a thorough piece of work.

22. What is less clear is the change in the evidence base which has led to later changes in the Council's position, as the updates to the 2008 Study also address the substantial unmet need in the area. Even the 2014 iteration (which oddly omits the Co-op extension) deals with poor retention rates in the rural market towns such as Shipston.
23. One suggested reason for the change in the Council's position was the need to consider the position at Southam, where an edge of town store was being developed. However, even if that were the case, from the limited evidence available, Southam town centre remains healthy, and includes the edge of centre main food store and an in-centre Co-op, which was apparently refurbished after the out of town store opened. Overall, the reason for the change in the Council's position is not fully explained by the evidence before me.

*The current retail position*

24. Although the figures differ between the three retail witnesses, there is no doubt that there is a substantial leakage of expenditure out of the Shipston study area to larger stores in higher order centres, especially in relation to main food shopping. The precise figure is of limited relevance, as it is clear from the evidence that there is a considerable leakage from the catchment area. Although there are two convenience stores in Shipston town centre, around two thirds of the overall convenience trade and the great majority of main food expenditure from the primary catchment area of the town is spent at out of centre stores at significant distances. Anything between 7 and 30 mile round trips are undertaken.
25. There was some suggestion that, as the residents of Shipston and the surrounding area have access to these more distant retail facilities, their needs are met, and this in some way diminishes the issue. However this is to ignore the effect that this has on Shipston town centre, the inconvenience to residents, and the unsustainable travel modes and patterns which the current situation brings about. It also assumes that all residents have easy access to transport to these more distant locations.
26. There are differences between the retail witnesses related to the trade draw and trade diversion of the proposed supermarket from each zone. One relatively minor difference is that the appellant (unlike the Council and the Co-op) allows for some inflow to the new store from outside the Study Area. This is reasonable as, although such trips are likely to be limited, the draw of the proposed supermarket will not cut off at a defined boundary. Some residents, for whatever reason, would make apparently excessive trips to the proposed supermarket for a range of personal reasons.
27. There is broad agreement between the parties in relation to Zone 3, and the main difference occurs in relation to Zone 2, as one moves closer to Shipston. Some parts of this Zone are within 10 minutes' drive of the town. The Council

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<sup>12</sup> Document SDC 4.4

and the Co-op assume between 5% and 7% of the new store's trade coming from this zone, whereas the appellant adopts a higher figure of 15%. To a large extent this difference is a matter of professional judgement and opinion. This is made more uncertain by the fact that no operator has been named for the supermarket, and different operators may have different attractiveness at distances. Overall, given the relative proximity of parts of this Zone to the proposed supermarket, the appellant's higher figure appears more realistic.

*The current retail offer in Shipston and the impact of the proposal*

28. Shipston is an attractive and comparatively small market town, with the retail offer anchored by two very similar small Co-op stores in the town centre. Although there are some differences in the appearance and offer of these stores, these differences are very limited. From the evidence before me and from what I saw on site, the differences are not significant and, to all intents and purposes, there is very limited choice or competition for consumers. The need for improved provision was assessed in the 2008 Colliers Study, but is a matter on which the Council is largely silent.
29. As set out above, there is no suggestion that there is a sequentially preferable site on which this deficiency can be rectified. The only known investment of any significance within the town centre is the extension to the larger Co-op, which was stated to be going ahead regardless of the outcome of this appeal – and by the time of this decision should have been completed. However this will not address the lack of local consumer choice. In addition it will still result in a store far too small to address the quantitative shortfall, and will remain a store with some inherent layout drawbacks.
30. The proposal therefore provides improved local consumer choice, and is accordingly in line with that part of paragraph 26 of the Framework. This matter weighs in favour of the proposal.
31. Turning to the impact of the proposal on the vitality and viability of the town centre as a whole, the three retail witnesses again produced different figures – largely related to the differing inputs and assumptions. These range from 40% (the appellant's position), through 48% (the Council's position), to 52% (the Co-op's position). Each of these is clearly justified in its own terms, and equate to a financial impact of between £3.25 million to at least £4.95 million. This is clearly a substantial impact, but is potentially mitigated by two factors – the way in which the impact might fall on stores which are significantly overtrading, and the potential for linked trips.
32. Although the effect on Shipston town centre must be considered as a whole, the effect on the two Co-op stores is of very considerable importance, as these stores effectively anchor the convenience offer in the town centre. There was some suggestion that judging impact in relation to benchmarking is not appropriate, however it is an orthodox approach and is adopted here.
33. There is no doubt that the two Co-op stores are significantly overtrading in comparison with the agreed benchmark figure and that, if the appeal scheme goes ahead, the larger store will still be trading at 7% over benchmark, whilst the smaller Mid-Counties store would be trading between 60% - 75% below benchmark.

34. Based on this and the extension at the larger Co-op, the appellant accepts that the smaller Mid-Counties store may close. Although the position of the Mid-Counties Co-op towards the appeal proposal is not known, this seems at least possible. The larger Co-op store, refurbished and extended, would be in a far better position and their stated position is that they would not close – indeed they might acquire trade due to brand loyalty if the smaller Co-op were to close.
35. The appellant suggests that, if the smaller Co-op were to close, the unit would be occupied by another retailer. There is no way of proving this assertion but, based on what I saw on site and vacancy rates, this is at least a reasonable possibility. In any event, even if the vacated unit were occupied by a non-food store and given that the smaller Co-op store largely duplicates the larger, there would be little detriment to the convenience offer in the town centre.
36. Overall, there is some evidence that some independents in the town centre are underperforming and some limited evidence of churn in units, and there is natural concern regarding the impact of a new supermarket on smaller stores – especially as the supermarket would have free and accessible parking. But overall, the impact on the two anchor stores and the town centre is not such as would justify dismissing the appeal.
37. The situation regarding linked trips is largely subjective. Clearly the two Co-op stores generate linked trips to other parts of the town centre. If the proposed supermarket goes ahead, the reduction in trade at the larger Co-op store, along with the potential loss of the smaller store, would result in a reduction in linked trips. However what is not known is how many of the customers of the smaller store would transfer to the larger, thereby maintaining the linked trips. What is even less certain is the number of linked trips from the new supermarket to the town centre. This is essentially unquantifiable, but what is clear is that clawing back trade to the appeal site, rather than continuing the massive leakage to other areas, would generate at least the potential for an increase in linked trips.

*Other retail matters – the Tilemans Lane appeal decision*

38. All parties have assessed the relevance of a 2001 appeal decision at Tilemans Lane<sup>13</sup>. Various assertions were made to me as to the health of Shipston town centre at that time and in the period leading up to that appeal. Although it is of note that the current appeal proposal is around 25% larger than the Tilemans Lane scheme, and the Inspector in that case found a 37% impact to be unacceptable, this is of limited weight in relation to the current appeal. The detail of the evidence put before the previous Inspector is not known, national and local policy has moved on since that time, and various parties have subsequently assessed and updated the changing retail position in Shipston.

*Other retail matters – the Banner Homes permission*

39. Since the close of the Inquiry, planning permission has been granted for up to 70 dwellings on the opposite side of Campden Road<sup>14</sup>. The appellant has noted that this decision should ideally have been built into the retail assessments, and stated that new residents would be highly likely to shop in the same

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<sup>13</sup> APP/J3720/A/01/1057814

<sup>14</sup> APP/J3720/A/14/2217247 Document 18

manner as existing residents – i.e. that around 75% would carry out their main shopping outside Shipston, exacerbating the current unsustainable patterns of travel. Revised assessments are not necessary, but it is reasonable to assume that the appellant's position regarding the shopping patterns of new residents is correct.

*Conclusion on retail matters*

40. There is no substantive evidence of any existing, committed and planned public and private investment in the Shipston catchment area. The only investment, aside from the appeal scheme, where detail was provided was the Co-op extension and improvement, and this has gone ahead regardless of and in full knowledge of the appeal scheme.
41. The proposal complies with the sequential test, as accepted by all parties.
42. The proposal would represent a significant improvement in consumer choice. There would clearly be an impact on the town centre, but the consequences of this are not such as should cause the appeal to be dismissed. Overall, the proposal would not harm the vitality and viability of Shipston town centre.

**The effect on the character and appearance of the area**

43. The development plan policy context is provided by saved LP policies PR.1 and DEV.2, which deal with the need to respect the landscape and settlement character. These policies reflect the approach of the Framework, which is to recognise the intrinsic character and beauty of the countryside. In 2010 the emerging CS recognised the development potential of the site, but it is far from clear to what extent landscape issues were taken into account and, in any event, the CS has moved on since that time – this matter is of historical interest only.
44. An assessment of the zone in which the appeal site is located was undertaken by White Consultants in 2011 (the White Study)<sup>15</sup>, and a Landscape Capacity Study of the appeal site itself has also been undertaken. The site is within National Character Area 96: Dunsmore and Feldon (2013).
45. The parties agreed that the appeal site is part of an area of medium sensitivity for residential development and high/medium sensitivity for commercial development. It is further agreed that these are the lowest categories of sensitivity surrounding Shipston for both forms of development.
46. The Council and the appellant agreed a range of viewpoints for the appellant's Landscape and Visual Impact Assessment (LVIA). No objection was raised to the methodology used in the LVIA, which is broadly in line with the principles published by the Landscape Institute and the Institute of Environmental Management and Assessment. I visited all the agreed viewpoints, and others, during my site visit. The appellant's montages were accepted as accurate by the Council in the Statement of Common Ground, although the landscape witness for the authority raised some detailed points at the Inquiry – however these matters were not pursued, and I consider the montages are fair representations of the proposal.

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<sup>15</sup> SDC 5.3

47. From the evidence before me and specifically from my site visit, I consider the Council's approach begins from a position of overstatement of the landscape value of the area. The Inquiry evidence from the Council refers to the landscape as being of great value and, particularly in the light of the White Study, this appears to be an overstatement of its worth. The appeal site is not located in a statutory or locally designated area of landscape protection, and this approach effectively equates the area to such a specifically designated area. I am also concerned with the Council's calibration of the magnitude of change – which equates the effect of the proposal to that which would be caused by a very major development in high value countryside.
48. Turning to the effect on the area itself, rather than the assessments by the landscape witnesses, it is clear that from certain agreed viewpoints, most of Shipston is seen sitting in the valley floor. There is little development up the surrounding slopes.
49. The proposal would extend the development into open countryside. This effect would be noted particularly when travelling along Campden Road or viewing the area from footpaths to the south. However, visibility does not necessarily equate to harm, and there are three factors which lead me to the conclusion that the development would not harm landscape character – the presence of the Cala Homes site to the west, of the Banner Homes site to the south, and the limited extent to which the proposal would rise up the lower slopes of Waddon Hill to the north.
50. The Cala Homes scheme is a very significant amount of housing and commercial development. There was some debate at the Inquiry as to the extent that this would be appreciated from the surrounding area, due to the amount of boundary screening. Having carefully considered the plans showing boundary retention and planting, I am of the clear view that this substantial development, set at a significantly higher level than the appeal site, will be appreciated from a range of public viewpoints – contrary to the view expressed by the Council at the Inquiry. That said, the Cala Homes development will be visually discrete and will not read as part of Shipston.
51. The Banner Homes development on the south side of Campden Road will extend the settlement westwards towards the Cala Homes site.
52. The proposed development would therefore be enclosed by urban development on three sides. The consequence would be to visually connect the existing developed area of Shipston, including the Banner Homes site, to the Cala Homes site. This can reasonably be seen as a logical extension of the settlement to link with the currently isolated Cala Homes development and, in principle, there is nothing harmful in extending the settlement further along the valley floor. The proposal would not conflict with the criteria in LP policy DEV.1 one of which relates to the need for development to be integrated with the existing settlement in terms of land uses and physical form.
53. This leads to consideration of the extent to which the proposal would rise above the valley floor towards Waddon Hill. The White Study identified the site within a zone with medium landscape sensitivity and which had the potential to accommodate some housing. However that was envisaged to be below the 85 metre contour level – part of the current proposal would extend above this.

54. The Council's landscape witness, whilst accepting development up to the 85 metre contour, also stated that the southeast part of the site could be developed (which would approximately reflect the Banner Homes site to the south). Taken together, these two points mean that the Council's position is that a significant part of the appeal site could be developed without landscape harm.
55. To the extent that part of the scheme would be above the 85 metre contour, this raises the question of the relevance of this distinction. There is nothing on the ground or any break in the slope to reflect this contour line, and this level does not in any way contain the town visually. The development would still read as being located in the valley, rather than rising up the valley sides to a significant extent. The Council drew support for their view of the importance of the 85 metre contour from the Banner Homes appeal decision. However I read that decision as referring to the contour line as a matter of fact, rather than endorsing its importance.
56. There was some criticism of the credibility of the Council's landscape witness at the Inquiry. It is true that she was only retained during the appeal process but, although I disagree with some of her assessments, her evidence was clearly presented and it is not unusual for a consultant to be retained after planning permission is refused. What is of slightly more relevance is the fact that Mr White, the author of the White Study (within which the 85 metre contour had been initially identified) was stated by the Council as having declined to represent the position of the authority at the Inquiry.
57. Overall, there would clearly be a change in the landscape as a result of the proposal. Undeveloped fields would be replaced by housing and commercial development. However change does not equate to harm. Although the appeal site is outside the built up area of Shipston and within open countryside, the existence of two other permissions in the immediate area, with which the appeal scheme would link, means that the scheme would be viewed as a logical continuation of the settlement, linking other developments. The slope of Hanson Hill would rise above the buildings, as it does above other existing buildings.
58. For the above reasons, the proposal would not harm the character and appearance of the area, including the setting of Shipston and the surrounding countryside. It would comply with LP policies PR.1 and DEV.2.

## **Other matters**

### *Housing land supply*

59. Prior to the 2014 sessions of the Inquiry, the Council and the appellant<sup>16</sup> concluded a Statement of Common Ground related to Housing Land Supply<sup>17</sup>. This stated that there was less than a five year supply of housing land within the District and that therefore paragraph 49 of the Framework was engaged. The parties differed as to the extent of the shortfall but agreed that there was therefore no need to consider the details of the position at the Inquiry, and no evidence was heard on this matter – it being left to submissions.

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<sup>16</sup> The Co-op were not involved in the housing aspects of the proposal

<sup>17</sup> Doc 10

60. As summarised above, the position of the authority changed after the close of the Inquiry, and the Council advised (21 August 2014) that the authority had a 5.4 year supply as of March 2014. This was not accepted by the appellant.
61. After exchanges of correspondence and the publication of several appeal decisions, the Council submitted a note produced on 2 January 2015<sup>18</sup> which stated that a five year housing land supply did not exist, and that the supply was 4.5 years. Based on the Council's starting point, the appellant broadly agreed with that figure, but pointed out that their preferred starting point led to only a 2.6 year supply<sup>19</sup>.
62. These matters are being considered in the context of the emerging Core Strategy Examination, and the remaining difference between the parties is not a matter which can be resolved in the context of this appeal. What is important is that the parties agree that the position has reverted to that set out in the Statement of Common Ground, namely that there is no five year housing land supply and that paragraph 49 of the Framework comes into play.
63. On that basis, the Council's policies for the supply of housing are not up-to-date and, in accordance with paragraph 14 of the Framework, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole or specific policies in the Framework indicate development should be restricted. The Council and the appellant agreed that substantial weight should be applied to this matter<sup>20</sup>.
64. In addition, the proposed 35% affordable housing – across the Extra Care and market elements - would contribute to meeting the acknowledged shortfall in local and district wide provision. Again, the two parties agreed that this is a matter to which substantial weight should be given<sup>21</sup>.

#### *Highways matters*

65. Some limited concern regarding highways implications have been raised by local residents. However the main parties agreed that the proposal would not have an adverse impact on the local highway network. The Highway Authority has no objection to the development, subject to various matters which can be covered by conditions and the Planning Obligation. There is no reason to disagree with that position<sup>22</sup>.

#### *Conditions*

66. A range of conditions were produced, without prejudice, jointly by the Council and the appellant. These were discussed and agreed at the Inquiry in the light of Planning Practice Guidance.
67. Along with the standard outline conditions (2, 3 and 4), conditions are necessary to link the development to the Design and Access Statement and the broad approach of the parameters plans (1), and to control the site levels (11). Given the size of the development, a condition is required relating to the

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<sup>18</sup> Document 16

<sup>19</sup> Document 17

<sup>20</sup> Document 8

<sup>21</sup> Document 8, Document 12 Section 10

<sup>22</sup> Ecology, flooding, drainage, environmental issues, health and open space/allotments are satisfactorily addressed by Document 12 Section 12

- phasing of the scheme (5). The number of dwellings/apartments and the size and composition of the retail store need to be limited to that specified in the application details (6 and 7). Similarly the access needs to be laid out as submitted in the interests of highway safety (13).
68. Various matters need to be controlled in relation to the retail element and in the light of the effect on the town centre – the convenience/comparison split, a restriction on the nature of goods, and the provision of signage (7, 8 and 9).
69. To protect the amenity of residents of existing and proposed dwellings, the opening hours of the supermarket should be restricted (10). For the same reason a noise mitigation scheme needs to be submitted for approval, deliveries to the supermarket and the petrol station need to be restricted, and noise limits imposed (27, 28 and 29). A Construction Management Plan, covering a range of matters during the construction of the development, needs to be submitted for approval (30).
70. To ensure the accessibility of the Extra Care units, an Access Strategy covering the whole site is necessary to enable access and use by those with mobility impairments (12).
71. A range of conditions are necessary to control the landscaping of the site, protect trees, avoid disturbance to nesting birds, and assess/address the potential for bats and badgers. These are required in the interests of the appearance of the development and for biodiversity reasons (14, 15, 16, 17, 18 and 19).
72. For biodiversity and residential amenity reasons, external lighting needs to be controlled (20).
73. The details of foul and surface water drainage need to be submitted for approval, to ensure the adequate provision of such facilities and to avoid flood risk (21, 22 and 23).
74. In the interests of sustainable construction and the quality of the development, conditions are required to address sustainable construction (24, 25, 26 27 and 31).

#### *Planning Obligation*

75. A Planning Obligation<sup>23</sup> has been concluded between a range of parties, including the District and County Councils. This makes a wide range of provisions, and I have considered each in the light of the policy in paragraph 204 of the Framework and the tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010.
76. The Council has set out the background and justification to the provisions in a submitted document<sup>24</sup>. In summary:
- The Public Open Space provision is based on LP policies COM.4 and COM.5 and a recent study demonstrating a shortfall in provision in some specific aspects of open space. This is supplemented by Guidance providing detailed requirements for on-site open space.

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<sup>23</sup> Document 13

<sup>24</sup> LPA 2

- The Public Transport Contribution is founded on LP policy COM.7 and IMP.5, and Local Transport Plan policies. In conjunction with the adjoining Cala Homes site this would enable the provision of a new bus service and/or improvements to public transport in the vicinity of the site.
  - The Library Contribution is supported by LP policy IMP.4, dealing with infrastructure provision, and by Public Library Service Standards which justify the quantum of the contribution.
  - The Education Contributions are supported by LP policies IMP.4, COM.2 and COM.3. Contributions from this and other developments will be used, along with County Council resources, to contribute to the provision of additional school places, particularly at the local Primary and High Schools.
  - The Footpath Works contribution is based on the need to upgrade the footpath to the town so as to encourage its use, in line with LP policy COM.9. The costing of the works has been set out. As this provision is also provided for in the Obligation related to the Cala Homes site, the Obligation has been drafted to avoid double payment.
  - The provision of 35% Affordable Housing is based on LP policies COM.13 and COM.14, a Supplementary Planning Document (SPD) and a practice note. Although there is no policy specifically referring to affordable housing for Extra Care schemes, reference to this aspect is made in the SPD, which supports this element of the Obligation.
  - The Sustainability Welcome Pack is supported by policies in the draft Local Transport Plan, and the basis for the quantum of the contribution has been clearly set out.
  - The Healthcare Contribution is based on LP policies COM.3 and IMP.4, and would be targeted at the nearby Medical Centre, which is nearing capacity. The justification for the quantum of the development has been set out.
  - Sustainable Urban Drainage System (SUDS). This aspect of the Obligation relates to the future maintenance of the SUDS in line with LP policy DEV.7.
  - As it is accepted that the development would have an effect on the town centre, the Town Centre Contribution is intended to mitigate the effect in line with LP policies COM.2 and COM.19. Although there is no document to justify the quantum of the contribution, the Council has set out the agreed method of calculation and the targets for the monies – this justifies the need for and the amount of the contribution.
77. As summarised above, the Obligation accords with the policy in paragraph 204 of the Framework and the tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010. The Obligation is a material consideration in this case. Many of its provisions are designed to mitigate the impact of the proposal and these elements therefore do not provide benefits in favour of the appeal. However other matters, most notably the provision of affordable housing, weigh in favour of the appeal.

## **Planning balance and conclusion**

78. The promotion of sustainable development is a key national policy, and I will summarise the key issues in terms of the three dimensions of sustainability as defined in the Framework: economic, social and environmental.
79. In terms of the economic dimension, the creation of employment, both during the construction stage and subsequently, is an important element of the proposal. The parties agree<sup>25</sup> that the development would create 65 full time equivalent (FTE) jobs in the Extra Care development and 110 FTE jobs in the supermarket. In addition, house building is recognised as an important driver of economic growth and there would be economic benefits to the construction industry from the proposed development. The Council considers that the employment generation should be tempered by any loss of employment in the town centre. Even if that were accepted to be likely, the economic benefits would remain significant. In addition, in the longer term, the level of disposable income in the local area would be increased with some commensurate growth in the demand for goods and services.
80. In terms of the social dimension the proposal would add significantly to the supply and mix of housing in the town, including 35% affordable housing and the Extra Care accommodation. There would also be the provision of a community centre. Overall, the proposal would contribute to a strong and vibrant community, and the provision of new dwellings in a District with an identified housing shortfall carries significant weight. The provision of a retail development to address the current problems of leakage from the area would be a significant benefit. It is acknowledged that the development has raised concerns about the consequences for the existing town centre, although local representations are divided on this matter. However, as set out above, the balance of evidence is strongly in favour of the provision of retail facilities on the site.
81. With respect to the environmental dimension of sustainable development, whilst there would be an effect on the natural environment, this falls far short of an impact which would justify dismissing the appeal. In addition the more sustainable retail shopping patterns which would result from the development would reduce pollution and help foster more sustainable travel patterns.
82. Overall, the proposal represents sustainable development and would not cause any adverse impacts which would significantly and demonstrably outweigh the benefits, when assessed against the Framework as a whole, or conflict with any specific development plan or Framework policies.
83. For the reasons given above I conclude that the appeal should be allowed.

*P. J. G. Ware*

Inspector

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<sup>25</sup> Figures from Document 8

## **Land north of Campden Road, Shipston-on-Stour, Warwickshire**

### **Annex - Conditions**

#### *Plans list*

1. The development hereby approved shall be carried out in accordance with the following illustrative plans and drawings:
  - Site Location Plan Fig 2.1 (submitted with Environmental Statement);
  - Parameters Plan Fig 2.2 (submitted with Environmental Statement);
  - Access plan 0053-06 (submitted with Environmental Statement).

The development shall also be carried out in accordance with the Design and Access Statements and accompanying addendums unless otherwise required by conditions attached to this permission.

#### *Outline matters*

2. Approval of the details of the siting, design, external appearance of the buildings and the landscaping of the site (hereinafter called "the reserved matters") shall be obtained from the local planning authority in writing before any development is commenced.
3. Application for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of 3 years from the date of this permission.
4. The development hereby permitted shall be begun before the expiration of 2 years from the date of approval of the last of the reserved matters to be approved.

#### *Phasing of development*

5. No works shall be undertaken on site in relation to the development hereby approved until such time as a phasing schedule, report and plan of the development has first been submitted to and approved in writing by the Local Planning Authority; and implemented in accordance with such approved details or any subsequent revisions to the phasing information, as agreed in writing with the Local Planning Authority.

#### *Restrictions on buildings and layout*

6. No more than 54 dwellings, 80 'extra care' cottages and 50 'extra care' apartments and up to 500m<sup>2</sup> community building (falling within Use Classes D1/D2) shall be erected on the site in furtherance of the permission hereby granted.
7. The retail store shall be limited to a net retail sales area of 1,800m<sup>2</sup> comprising 1,500m<sup>2</sup> convenience retail space and 300m<sup>2</sup> comparison retail space. 'Net sales area' excludes lobby, customer toilets, customer service desk and checkouts.

8. The following restrictions will apply to the first and subsequent occupation of the supermarket hereby permitted:
  - The store shall not include a pharmacy.
  - The store shall not incorporate a cafeteria or restaurant.
  - The store shall not incorporate a post office.
9. Prior to the opening of the supermarket, full details of the location and design of the town centre information boards and directional signage to be provided on the site shall be submitted to and approved in writing by the Local Planning Authority. The town centre information boards and directional signage shall be retained and maintained in the agreed locations.
10. The store shall not open be other than between 0600 hours and 2300 hours Monday to Saturday and 1000 hours to 1700 hours on Sundays and Bank Holidays.
11. No development, hereby permitted, shall take place on any phase, as secured by condition 5, until detailed plans and sections showing existing and proposed site levels for that parcel of land and showing the proposed relationship with adjacent parcels of land have been submitted to and approved in writing by the Local Planning Authority and the development thereafter shall only be carried out as approved.

#### *Access*

12. As part of the submission of any reserved matters application an 'Access Strategy' for the whole site has been submitted to and approved in writing by the Local Planning Authority. Without prejudice to the generality of the requirements of this condition the Access Strategy shall, in particular, contain proposals in respect of the design and layout of the development (both internally and externally) and relationship to adjacent development that include the provision of measures to enable its use by residents and visitors with mobility impairments. The development shall thereafter be undertaken and laid out in accordance with the approved Access Strategy, including the provision, maintenance and retention of such measures and facilities as may be specified therein.
13. The access to the site shall be positioned and laid out in accordance with drawing no.0053\_06 (submitted with Environmental Statement) prior to first occupation/use of any part of the development or phase hereby permitted.

#### *Landscaping and ecology*

14. No development hereby permitted shall take place on any phase, as secured by condition 5, until details of all hard and soft landscaping to be included within the site, together with an ecology and landscape implementation and management plan, relevant to that phase have been submitted to and approved in writing by the Local Planning Authority. The hard and soft landscaping works shall then be carried out in accordance with approved details and carried out prior to the occupation of any part of the development or in accordance with a programme of implementation that has first been agreed in writing with the Local Planning Authority.

15. The development hereby permitted shall be carried out in accordance with the criteria below to prevent possible disturbance and harm to nesting birds:
- All vegetative clearance to scrub, trees and hedgerows to be timed and carried to avoid the bird breeding season (March to August inclusive).
  - All vegetative clearance to scrub, trees and hedgerows not to commence until a qualified ecologist has been appointed by the applicant to inspect these features for evidence of nesting birds immediately prior to works. If evidence of nesting birds is found works may not proceed until outside of the nesting bird season (March to August inclusive) or until after the young have fledged, as advised by the ecologist.
16. No arboricultural works to trees with high bat potential (as identified in the Ecological Assessment Report and numbered as T 19 and T24 on the Tree and Hedgerow Retention Plan) shall take place during November to March (bat hibernation period); outside of this period works should be carried out under the supervision of a suitably qualified bat worker. No trees shall be cross cut in close proximity to cavities or hollows. Any sections containing cavities or hollows shall be carefully lowered to the ground and left with openings exposed for a minimum of 24 hours after felling to allow any bats that could be present to leave of their own accord.
17. The site shall be surveyed for the presence of badgers immediately before any development on any phase takes place. If evidence of badgers is found at this time, a full badger survey should then be carried out by a qualified ecologist. The results of any badger survey, and recommendations made relating to this, shall be kept confidential, and taken into account during development design and implementation. If evidence of badgers is found, Natural England should be consulted, as badgers and their setts are protected under the 1992 Badgers Act.
18. No part of the development or any phase hereby permitted shall be commenced or equipment, machinery or materials brought onto the site until an Arboricultural Method Statement, to include details of tree and hedgerow protection, has been submitted to and approved in writing by the Local Planning Authority and implemented on site.
19. No development shall take place on any phase, as secured by condition 5, until a schedule of landscape maintenance for a minimum period of 5 years for the relevant phase of development has been submitted to and approved in writing by the local planning authority. The schedule shall include details of the arrangements for its implementation. Development shall be carried out in accordance with the approved schedule.
20. No development shall take place on any phase, as secured by condition 5, until details of a scheme for the external lighting of the relevant phase of development hereby permitted shall be submitted to and approved by the local planning authority. Without prejudice to the generality of this condition, such scheme shall be in accordance with the Access Strategy approved pursuant to Condition 12 insofar as material to this condition. The development shall thereafter be carried out in accordance with the approved scheme and all

lighting fixtures and equipment shall be maintained in accordance with the approved scheme.

### *Drainage*

21. No development, hereby permitted, shall take place on any phase, as secured by condition 5, until a surface water drainage scheme for the relevant development phased, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed. The scheme shall include:

- Surface water from the development will be restricted to a Greenfield runoff rate of 51/s/ha which equates to 231/s for the whole site
- On site attenuation will be provided to accommodate the 1 in 100 year plus 30% for climate change event with no flooding on or off site.
- The proposed on site surface water drainage system should be designed to the Sewers for Adoption, 30 year standard or similar. However, details must also be provided to confirm that surface water will not leave the proposed site in the 100 year 30% (for climate change) event. If the system surcharges, we may require additional space to be made for water, the location of any surcharging should be identified as should any resultant overland flood flow routes. Any excess surface water should be routed away from any proposed or existing properties. Drainage calculations must be included to demonstrate this (e.g. MicroDrainage or similar package calculations), including the necessary attenuation volume, pipeline schedules, network information and results summaries.
- Details of how the scheme shall be maintained and managed after completion.

22. No development shall take place on any phase, as secured by condition 5, until a scheme for the disposal of sewage relevant to the development phase has been submitted to and approved in writing by the Local Planning Authority and thereafter no part of the development phase shall be occupied until the approved works have been carried out.

23. No development shall take place on any phase, as secured by condition 5, until a scheme for the provision of adequate water supplies and fire hydrants, necessary for fire fighting purposes for the relevant part of the site, has been submitted to and approved in writing by the Local Planning Authority. The relevant development phase shall not then be occupied until the scheme has been implemented to the satisfaction of the Local Planning Authority.

### *Residential conditions*

24. All new residential dwellings within each phase shall achieve a minimum rating of Level 3 of the Code for Sustainable Homes or such similar requirements that supersede the Code for Sustainable Homes as applicable at the time of commencement of development within that parcel. No dwelling shall be



- the loading and unloading of plant and materials;
- the storage of plant and materials used in constructing the development;
- the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
- installation and maintenance of wheel washing facilities;
- measures to control the emission of dust, dirt and odour during construction;
- a scheme for recycling/disposing of waste resulting from demolition and construction works;
- an appropriately scaled plan showing "Environment Protection Zones" where construction activities are restricted and where protective measures will be installed or implemented;
- details of protective measures (both physical measures and sensitive working practices) to minimise impacts during construction;
- details of persons/organisations responsible for: a) compliance with legal consents relating to nature conservation; b) compliance with planning conditions relating to nature conservation; c) installation of physical protection measures during construction; d) implementation of sensitive working practices during construction; e) regular inspection and maintenance of the physical protection measures and monitoring of working practices during construction; f) provision of training and information about the importance of "Environment Protection Zones" to all construction personnel on site;
- pollution prevention measures;
- in relation to every element topic or subject included in the Plan, proposals for the standards to be achieved, monitoring schedules, record keeping and communication of results to the Local Planning Authority.

All works shall be carried out in accordance with the approved details.

31. No development shall take place on any phase, as secured by condition 5, until a scheme for the provision of energy from on-site renewable sources, or a fabric first design sufficient to replace a minimum of 10% of the predicted carbon dioxide emissions from the total energy requirements of the development above that of current Building Regulations at the time of commencement, for each phase of development, has been submitted to and approved in writing by the Local Planning Authority. The design features, systems and equipment that comprise the approved scheme shall be fully implemented in accordance with the approved plans and particulars prior to the development first being brought into use, or alternatively in accordance with a phasing scheme which has been agreed in writing by the Local Planning Authority, and shall thereafter be retained in place and in working order at all times.

## APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Mr David Manley QC, instructed by the Solicitor to the Council

He called:

Dr R Doidge BA(Hons) PhD FRGS	Independent retail consultant
Ms B Kirkham DipTP BLD CMLI	Director, Kirkham Landscape Planning Ltd
Mr P Smith BA(Hons) DipTP TPR MRTPI	Director, Brian Barber Associates

FOR THE APPELLANT:

Mr Paul Tucker QC, instructed by Messrs Shoosmiths

He called:

Mr A C Bateman BATP(Hons) MRICS MRTPI MCMi MIOd FRSA	Managing Director, Pegasus Group
Mr J P Cooper BSc(Hons) DipLD FLI	Director, SLR Consulting
Mr S A Tibenham MRTPI	Director, Pegasus Group

FOR THE Co-op:

Mr Giles Cannock of Counsel, instructed by NJL Consulting

He called:

Mr M Saunders MA	Director, NJL Consulting
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INTERESTED PERSONS: <sup>26</sup>

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<sup>26</sup> Some names on the attendance list are hard to decipher, please accept my apologies if I have given incorrect spellings

Ms G Poole Murray	Local resident
Ms G Kiely	Local resident
Ms R King	Local resident
Mr G Bourge	Local resident
Ms J Warner	Local resident
Councillor J Kenner	District Councillor, Shipston Ward
Mr N Butler	Council for the Protection of Rural England
Ms King	Local resident and shopkeeper
Ms H Ashton	Local resident
Mr D Passingham	Local resident
Councillor I Cooper	Shipston Town Councillor
Mr G Legg	Local resident
Councillor R Cheney	District Councillor, Shipston Ward
Ms S Campbell	Local resident
Ms Harvey	Local resident
Councillor Ms Rollins	Nearby Parish Councillor

**DOCUMENTS**

**Inquiry documents**

Document 2013/1	List of persons present 1 October 2013
Document 2013/2	Letters handed in 1 October 2013
Document 1	List of persons present July 2014
Document 2	Letter (8 July 2014 from Antony Aspbury Associates
Document 3	Campaign to Protect Rural England statement
Document 4	Housing Strategy 2009 – 2014, Review 2012
Document 5	Stour United Businesses statement
Document 6	2 Fant Hill Barn – objection from Cllr J Kenner (2 July 2014)
Document 7	South Oxfordshire Core Strategy Inspector’s Revised Conclusions (Thame)
Document 8	Planning policy note (Brian Barber Associates)
Document 9	Stour United Businesses retailer survey (letter 19 April 2012 and subsequently)
Document 10	Housing Land Availability Statement of Common Ground
Document 11	Retail Statement of Common Ground
Document 12	Planning and Landscape Statement of Common Ground
Document 13	Planning Obligation (15 July 2014)
Document 14	Statement by Cllr Richard Cheney
Document 15	Plans showing site layout and vegetation at former IMI Norgren site (CALA Homes)

**Documents submitted after the close of the Inquiry**

Document 16	Council’s email (5 January 2015) and Note regarding housing land supply
Document 17	Appellant’s email (14 January 2015) regarding housing land supply
Document 18	Appeal on land south of Campden Road (4 August 2014) (2217247)
Document 19	Council’s comments on appeal decision on land south of Campden Road
Document 20	Appellant’s comments on appeal decision on land south of Campden Road

**Council’s documents**

C1	Council’s closing submissions
C2	Council’s statement regarding Planning Obligation and Regulation 122 of the CIL Regulations

**Appellant’s documents**

APP1	Secretary of State decisions, Wychavon (2199085 & 2199426)
APP 2	Appellant’s note in response to Dr Doidge’s note
APP 3	Application (16 August 2013) for works to Co-op premises at 9 – 11 High Street

APP 4	Appellant's closing submissions
APP 5	Appellant's response to Co-op closing submissions

### Co-op's documents

C1	Co-op's closing submissions
C2	Plan showing proposed alterations at 11 High Street

### Core Documents

<b>Adopted Development Plan and SPD'S/SPG'S</b>		
SDC/ASL/CO OP	1.1	Saved policies of the Stratford-on-Avon District Local Plan Review 1996 - 2011
SDC	1.2	Meeting Housing Needs 2008
SDC	1.3	Car and Cycle Parking Standards 2007
SDC	1.4	Sustainable Low Carbon Buildings 2007
SDC	1.5	Provision of Open Space 2005
SDC	1.6	Stratford on Avon District Design Guide 2002
<b>LDF and evidence base documents (Not retail or landscape related)</b>		
SDC	2.1	Intended Proposed Submission Core Strategy July 2013
SDC	2.2	Draft Core Strategy 2012
SDC	2.3	Draft Core Strategy 2010
SDC	2.4	Draft Core Strategy 2008
SDC	2.5	Review of housing requirements for Stratford District Council (ERM) March 2013
SDC	2.6	Housing provisions options study update (GL Hearn) Jan 2013
SDC	2.7	Strategic Market Housing Assessment - Jan 2013 prepared by GL Hearn
SDC	2.8	Strategic Housing Land Availability Assessment - Jan 2013. Prepared by Peter Brett Associates.
SDC	2.9	Housing Provision Options Study (GL Hearn, June 2011)
SDC	2.10	Strategic Market Housing Assessment - 2009
SDC	2.11	Strategic Housing Land Availability Assessment - 2009 review
SDC	2.12	Strategic Housing Land Availability Assessment - 2008
SDC	2.13	Employment Land Study (August 2011)
SDC	2.14	PPG17 Open Space, Sport and Recreation Assessment and Playing Pitch Strategy (Arup, April 2011)
SDC	2.15	Open Space, Sport and Recreation Assessment update - (ARUP) June 2012
ASL	2.16	Analysis of Representations to 2008 Draft Core Strategy, Nov 2008
ASL	2.17	Assessment of Land Parcels
ASL	2.18	Detailed Response Document to 2012 Draft Core Strategy
ASL	2.19	Core Strategy New Proposals Consultation July 2013

ASL	2.20	2010 Core Strategy - Summary of Representations Received February – April 2010 dated 21 <sup>st</sup> February 2011
SDC	2.21	Proposed Submission Core Strategy
<del>SDC</del>	<del>2.21</del>	<del>Strategic Housing Market Assessment (Nov 2014)</del>
SDC	2.22	Focused Consultation: 2011 – 2031 Housing Requirements and Strategic Site Options (Feb/March 2012)
SDC	2.23	Coventry and Warwickshire Joint Strategic Housing Market Assessment (SHMA) Nov 2013
SDC	2.24	ERM report - Update to Review of Housing Requirements for Stratford 18 <sup>th</sup> Dec 2013
SDC	2.25	Report to Cabinet 28 <sup>th</sup> April 2014
SDC	2.26	Report to Cabinet 12 <sup>th</sup> May 2014
SDC	2.27	Report to FUL Council 12 <sup>th</sup> May 2014
<b>Planning Policy and Companion Guides and Legislation</b>		
SDC/ASL/COOP	3.1	DCLG: National Planning Policy Framework (March 2012)
SDC	3.2	ANNEX A ONLY - Circular 11/95: The Use of Conditions in Planning Permissions
SDC	3.3	Community Infrastructure Levy Regulations 2010
SDC	<del>3.4</del>	<del>The Planning System: General Principles (ODPM 2005)</del>
SDC	<del>3.5</del>	<del>Ministerial Statement 'Planning for Growth'</del>
COOP	3.6	Government Response to Portas Review
SDC	3.7	Planning Practice Guidance (2014)
<b>Retail documents</b>		
SDC	4.1	Planning for Town Centres – Practice Guidance on need, impact and sequential approach (aka Planning Policy Statement 4 Practice Guidance) (PPS4 PG)
SDC	4.2	Convenience Goods Retail Study update (Apr 2012)
SDC	4.3	Comparison Goods Retail Study (May 2011)
SDC	4.4	Convenience Goods Retail Study (2008)
SDC	4.5	Richard Doidge - Proof of Evidence for the public inquiry into Tilemans Site, Tilemans Lane, Shipston planning reference 00/02887/OUT
SDC	4.6	<del>Experian Retail Planner Briefing Note 10.1, September 2012.</del>
SDC	4.7	<del>Understanding High Street Performance, A Report Prepared by Genecon LLP and Partners, Department for Business Innovation &amp; Skills, December 2011.</del>
SDC	4.8	The Portas Review, An Independent Review into the Future of Our high Streets, Mary Portas, December 2011.
SDC	4.9	The Effect of Supermarkets on Existing Retailers, Roger Tym & Partners on behalf of The Federation of Small Businesses (Scotland), December 2006.

SDC	4.10	Planning Impact Assessment, Shipston Heart Alive, November 2012.
SDC	4.11	Shipston on Stour Business Confidence Survey, 2012 Report, Action for Market Towns, August 2012.
SDC	4.12	Supplementary Retail Statement, Land at Shipston Road/Trinity Way, Stratford upon Avon, Roger Tym & Partners, February 2010.
COOP	4.13	Planning Appeal Ref: APP/HI705/A/12/2188392 - Former Smiths Industries Aerospace Limited, Winchester Road, Basingstoke. Tesco v Basingstoke and Deane Council)
COOP	4.14	Planning Appeal Ref: APP/E2340/A/12/2188392 Skipton Road Business Park, Skipton Road, Barnoldswick. Pendle Projects Ltd V Pendle Borough Council)
COOP	4.15	Planning Appeal Ref APP/C1570/A/11/2152457 & APP/C1570/A/11/2158685 - Land at Thaxted Road, Saffron Walden, Essex. Sainsbury's Supermarkets Ltd V Uttlesford District Council)
COOP	4.16	Planning Appeal Ref: APP/P4605/a/12/2187738 - Land off Pershore Road/Fordhouse Lane, Stirchley, Birmingham, West Midlands. Asda V Birmingham City Council)
COOP	4.17	Planning Appeal Ref: APP/E2340/A/12/2175946 - L & P Springs UK, Ravenscroft Way, Barnoldswick - Liberty Properties Ltd, Leggett and Platt Components Europe Limited and Tesco Stores Ltd V Pendle Borough Council
COOP	4.18	Planning Appeal Ref: APP/J3720/A/01/1057814 - Land fronting Tilemans Lane, Shipston-on-Stour - Pettifer Ltd/Gallagher Estates Ltd v Stratford-on-Avon District Council
<del>COOP</del>	<del>4.19</del>	<del>Convenience Goods Update December 2012 (Cabinet Paper)</del>
SODC	4.20	Sainsbury's Supermarkets Ltd, Land off The Fosse Way, Moreton-in-Marsh, Retail Assessment by WYG, April 2013
SODC	4.21	Proposed Class A1 Supermarket, Stow Road, Moreton-in-Marsh, Minton Property Developments, Retail Assessment by GVA, April 2013.
SODC	4.22	Proposed Sainsbury's, Wellesbourne, Retail Assessment by Applied Planning, February 2013
ASL	4.23	PPS4 - Planning for Sustainable Economic Growth (revoked)
ASL	4.24	Verdict UK Food & Grocery Retailers 2012
ASL	4.25	Stratford on Avon Retail Study 1997
ASL	4.26	Stratford on Avon Retail Study 2003
ASL	4.27	NEMS Household Shopping Survey 2013
<del>ASL</del>	<del>4.28</del>	<del>SoA Convenience Goods Retail Study Update (Nov 2012)</del>
ASL	4.30	SoA Cabinet Meeting Papers for 3 <sup>rd</sup> December 2012
ASL	4.31	SoA Cabinet Meeting Papers for 20 <sup>th</sup> August 2012
<del>ASL</del>	<del>4.32</del>	<del>Carborn Statement, 1999</del>
<del>ASL</del>	<del>4.33</del>	<del>McNulty Statement, April 2003</del>
<del>ASL</del>	<del>4.34</del>	<del>PPS6, 2006</del>
<del>ASL</del>	<del>4.35</del>	<del>PPSG6, 1996</del>

ASL	4.36	Richard Doidge Response to Planning Application 24/07/2012
ASL	4.37	Richard Doidge Response to Planning Application 05/11/2012
ASL	4.38	DCLG High street at the heart of our communities – The government’s response to Mary Porters Review
ASL	4.39	Southampton University – revisiting the impact of large foodstores on market towns and district centres
ASL	4.40	Competition Commission – The supply of Groceries in the UK Market Investigation
ASL	4.41	Competition Commission – Grocery market provisional findings
ASL	4.42	Holmfirth appeal decision (APP/Z4718/A/13/2191213)
SDC	4.43	Further updates of comparison goods and convenience goods retail studies (March 2014)
SDC	4.44	Report to Cabinet (7 <sup>th</sup> April 2014) on retail study – further update
ASL	4.45	Experian Retail Planner Briefing Note 11
ASL	4.46	Verdict Sector Report on UK Food & Grocery 2013 + Retailer Company Briefing Reports
SDC	4.47	Shopper Trends 2012 – IGD.com
SDC	4.48	House of Commons Business and Enterprise Committee; Post Offices – Securing their future 8 <sup>th</sup> Report of session 2008-2009 Vol.1 (7 <sup>th</sup> July 2009)
SDC	4.49	Beyond Retail; Redefining the shape and purpose of Town Centres, Task Force, November 2013
COOP	4.50	Planning Appeal Ref: APP/F0114/A/13/2191952 - Former Bath Press, Lower Bristol Road, Bath. Tesco Stores Limited v Bath and North East Somerset Council
ASL	4.51	NEMS 2013 – Shipston by CO-OP Stores
ASL	4.52	NEMS 2013 – Shipston by Stratford Stores
SDC	4.53	The retail Planning Knowledge Base – Briefing Paper – Linked Trips (June 2104) – The Institute for retail studies (university of Sterling)
<b>Landscape Documents</b>		
SDC	5.1	Guidelines for Landscape and Visual Impact Assessment (3 <sup>rd</sup> Edition)
SDC	5.2	Landscape Character Assessment Guidance for England and Scotland 2002
SDC	5.3	Landscape Sensitivity Study (July 2011)
SDC	5.4	Landscape Sensitivity Study update (June 2012)
SDC	5.5	Warwickshire Landscape Guidelines 1993
SDC	5.6	1:25,000 OS map Cotswolds OL45
SDC	5.7	European Landscape Convention
SDC	5.8	Landscape Capacity Study 2014
SDC	5.9	National Character Area Profile 96: Dunsmore and Feldon 2013
<b>Other documents</b>		
SDC	6.1	Warwickshire Local Transport Plan 2006 (LTP2)
SDC	6.2	Warwickshire Local Transport Plan 2011-2026 (LTP3)
SDC	6.3	Shipston-on-Stour Town Plan 2008

SDC	6.4	Shipston on Stour Housing Needs Survey 2005
SDC	6.5	IMI Norgren Appeal decision (Ref: APP/J3720/A/12/2185727)
SDC	6.6	IMI Norgren Appeal – Costs decision (Ref: APP/J3720/A/12/2185727)
SDC	6.7	High Court Judgement into Shottery Appeal
SDC	6.8	Report to Regulatory Committee 14 <sup>th</sup> August 2103
SDC	6.9	Officers Report to East Committee 24 <sup>th</sup> January 2013
ASL	6.10	Cabinet Papers – April 2013
ASL	6.11	Cabinet Papers – 5 <sup>th</sup> September 2011
ASL	6.12	Shottery Appeal Decision (Ref: APP/J3720/A/11/2163206)
ASL	6.13	Shottery Court Decision (Ref: APP/J3720/A/11/2163206)
ASL	6.14	Council Meeting Papers - July 2013
ASL	6.15	Tewkesbury v Secretary of State Decision (Ref: CO/8962/2012) (Ref: CO/10438/2012)
ASL	6.16	Andover Appeal Decision (Ref: APP/X3025/A/10/2140962)
ASL	6.17	Bude Appeal Decision (Ref: APP/D0840/A/09/2115945)
ASL	6.18	West Midlands Phase 2 Review and Panel Report
ASL	6.19	DCLG: Laying the Foundations
ASL	6.20	Winchcombe Appeal Decision (Ref: APP/G1360/A/12/2183317)
ASL	6.21	Wootton Bassett Appeal Decision (Ref:APP/Y3940/A/10/2141906)
ASL	6.22	Tetbury Appeal Decision (Ref: APP/F1610/A/11/2165778)
ASL	6.23	Honeybourne Appeal Decision (Ref: APP/H1840/A/12/2171339)
ASL	6.24	Moat House Farm, Marston Green Appeal Decision (Ref:APP/Q4625/A/11/2157515)
ASL	6.25	Stratford on Avon Information Sheet 21/2013 on 5 Year Housing Land Supply
ASL	6.26	Markfield Appeal Decision (Ref: APP/K2420/A/12/2180699)
ASL	6.27	Ashby de la Zouch Appeal Decision (Ref:APP/G2435/A/13/2192131)
ASL	6.28	Torquay Appeal Decision (Ref: APP/X1165/A/11/2165846)
ASL	6.29	Moreton in Marsh Appeal Decision (Ref:APP/F1610/A/10/2130320)
ASL	6.30	Chapel-en-le-Frith Appeal Decision (Ref:APP/H1033/A/11/2159038)
ASL	6.31	Bath and North East Somerset Core Strategy – Inspector’s Preliminary Conclusions
ASL	6.32	2011 AMR
ASL	6.33	2010 AMR
ASL	6.34	2009 AMR
ASL	6.35	2008 AMR
ASL	6.36	2007 AMR
ASL	6.37	2006 AMR
ASL	6.38	Stratford on Avon Housing Strategy 2009-14 - Review 2012
ASL	6.39	Stratford on Avon Housing Strategy 2009-14 - Review 2012 Evidence Log

ASL	6.40	Representations by Ainscough Strategic Land to 2010 Draft Core Strategy including letter dated 8th April 2010 (L005mv3), Schedule of Representations (R001mv3).
ASL	6.41	Representations by Ainscough Strategic Land to 2012 Draft Core Strategy
ASL	6.42	Warwickshire Structure Plan (revoked)
SDC	6.43	Irchester appeal decision (APP/H2835/A/12/2182431)
ASL	6.44	Judgement in Colman V SoS [2013] EWHC 1138
ASL	6.45	Judgement in Hunston Properties V SoS [2013] EWHC 2678
ASL	6.46	Mistletoe Row, Tenbury Wells appeal (APP/J1860/A/13/2194904)
<b>Appeal Documents</b>		
SDC	7.1	SDC Statement of Case
ASL	7.2	ASL Statement of Case
COOP	7.3	COOP Statement of Case
SDC	7.4	Statement of Common Ground – Planning and Landscape (Superseded)
SDC/ASL/COOP	7.5	Statement of Common Ground – Retail (Superseded)
SDC	7.6	CIL Justification (Updated June 2014)
ASL/SDC/COOP	7.7	Legal Agreement
SDC	7.8	LPA Landscape Proof of Evidence – Simon White (Superseded)
SDC	7.9	LPA Retail Proof of Evidence – Richard Doidge (Superseded)
SDC	7.10	LPA Planning Proof of Evidence – Philip Smith (Superseded)
SDC	7.11	Cllr Saint – Statement on Landscape
ASL	7.12	Appellants Planning Proof of Evidence – Tony Bateman (Superseded)
ASL	7.13	Appellants Retail Proof of Evidence – Sebastian Tibbenham (Superseded in part)
ASL	7.14	Appellants Landscape Proof of Evidence – Julian Cooper (Superseded)
COOP	7.15	Co-Op Retail Proof of Evidence – Mark Saunders (Superseded)
ASL	7.16	Appellants Supplemental Retail Proof – Sebastian Tibenham (Superseded)
Third Party	7.17	Antony Aspbury Associates
Third Party	7.18	Third Party Letters
SDC	7.19	SDC EIA request letter dated September 2013
SDC	7.20	PINs Screening Opinion dated 12 <sup>th</sup> Nov 2013
SDC	7.21	Application Documents and plans for residential scheme ref: 14/00318/OUT
ASL	7.22	Updated Planning and Landscape Statement of Common Ground
ASL	7.23	Updated Retail Statement of Common Ground
SDC	7.24	New LPA Landscape Proof of Evidence – Bettina Kirkham
SDC	7.25	Updated LPA Retail Proof of Evidence – Richard Doidge

SDC	7.26	Updated LPA Planning Proof of Evidence – Philip Smith
ASL	7.27	Updated Appellants Planning Proof of Evidence – Tony Bateman
ASL	7.28	Updated Appellants Retail Proof of Evidence – Sebastian Tibenham
ASL	7.29	Updated Appellants Landscape Proof of Evidence – Julian Cooper
COOP	7.30	Updated Co-Op Retail Proof of Evidence – Mark Saunders
ASL/SDC	7.31	SOCG – Planning and Landscape June 2014
ASL/SDC/CO OP	7.32	SOCG – Retail June 2014
<del>ASL</del>	<del>7.33</del>	<del>Housing supply note</del>
ASL/SDC	7.34	Agreed position statement on 5yr housing land supply
ASL	7.35	Rebuttal Retail Proof – Sebastian Tibenham
Co-Op	7.36	Rebuttal Retail Proof – Mark Saunders
<b>Application Documents</b>		
ASL	8.1	Application Form and Certificates
ASL	8.2	Committee report
ASL	8.3	Committee update sheets and formal minutes of committee
ASL	8.4	Decision notice
ASL	8.5	Planning Statement
ASL	8.6	Design and Access Statement
ASL	8.7	LVIA and appendices (inc. Tree survey)
ASL	8.8	Retail Impact Assessment (Feb 2012)
ASL	8.9	Addendum planning and Retail Statement (April 2012)
ASL	8.10	Letter from Pegasus re: Retail following Councils retail assessment
ASL	8.11	Composite retail statement (Oct 2012)
ASL	8.12	The Bird Group supplementary retail statement Feb 2012 – supporting info
ASL	8.13	Pegasus Retail note – comments on Richard Doidge (10 <sup>th</sup> Jan 2013)
ASL	8.14	Ecology Assessment
ASL	8.15	Agricultural land assessment
ASL	8.16	Heritage based assessment
ASL	8.17	Geophysical Survey Report
ASL	8.18	WSI – Archaeology and Confirmation e-mail from WCC Archaeology for WSI
ASL	8.19	Draft – Archaeological evaluation
ASL	8.20	Lighting assessment
ASL	8.21	Noise assessment and additional information (Letter dated 18 <sup>th</sup> May 2012)
ASL	8.22	Phase 1 environmental investigation
ASL	8.23	Drainage assessment
ASL	8.24	Utilities assessment
ASL	8.25	Sustainability and Energy statement
ASL	8.26	Flood risk assessment
ASL	8.27	Drainage statement
ASL	8.28	Potential heads of terms
ASL	8.29	Statement of Community Involvement

ASL	8.30	Transport assessment
ASL	8.31	Social Case for extra care development
ASL	8.32	Stage 1 Safety Audit for Roundabout Junction
ASL	8.33	Environmental Statement Volumes 1 and 2
<b>Original Application Plans</b>		
ASL	9.1	Location Plan P001
ASL	9.2	Illustrative masterplan and indicative layout – P002 Rev D1
ASL	9.3	Illustrative cross sections – P003
ASL	9.4	Parameters plan – indicative levels P004 Rev B
ASL	9.5	Parameters plan – building heights P005 Rev A
ASL	9.6	Parameters plan – Open space hierarchy P006
ASL	9.7	Parameters plan – Public Realm P007 REV A
ASL	9.8	Parameters plan – Urban Grain P008 REV A
ASL	9.9	Parameters plan – Parking Allocations P009 Rev A
ASL	9.10	Parameters plan – Indicative public realm materials P010
ASL	9.11	Detailed Site Cross Sections P011 Rev A
ASL	9.12	Indicative Floor Plans – Extra Care apartments – P012
ASL	9.13	Tree and Hedgerow Retention Plan – P004
ASL	9.14	Indicative accommodation schedule
<b>Superseded Plans</b>		
ASL	9.15	Superseded plans and accommodation schedule
<b>Latest Appeal Plans</b>		
ASL	9.16	Illustrative masterplan and indicative layout – P002 Rev F
ASL	9.17	Illustrative cross sections – P003
ASL	9.18	010_20_P004a - Parameters – Topo Rev A
ASL	9.19	010_20_P004b - Parameters – Levels Rev B
ASL	9.20	010_20_P005 - Parameters plan – Building heights Rev B
ASL	9.21	010_20_P006 - Parameters plan – POS Rev A
ASL	9.22	010_20_P007 - Parameters plan – Public Realm Rev B
ASL	9.23	010_20_P008 - Parameters plan – Urban Grain Rev B
ASL	9.24	010_20_P009 - Parameters plan – parking Allocations
ASL	9.25	010_20_P010 - Parameters plan – Public Realm materials
ASL	9.26	010_20_P011 – Detailed Cross Sections - Rev B
ASL	9.27	010_20_P012 – Extra care Apartments - Rev A
ASL	9.28	Revised Access plan – showing roundabout 53-04 Rev A
ASL	9.29	Revised Access plan – showing roundabout 53-05 Rev A
ASL	9.30	Parameters Plan in Environmental Statement – Figure 2.2
<b>Documents Submitted at Inquiry</b>		
ASL	10.1	Inspectors decision Pulley Lane, Droitwich Spa
Third Party	10.2	Letter From Anthony Asbury Consultants – New Retail Store, Shipston
ASL	10.3	Appellants opening statement
Third Party	10.4	Letter from CPRE
Third Party	10.5	Housing Review Strategy 2009 – 2014 - Review 2012
Third Party	10.6	Cllr Kenner Objection to Budgens application – Shipston (ref: 14/01447/FUL)
Third Party	10.7	Town Council Objection to Budgens application – Shipston

		(ref: 14/01447/FUL)
ASL	10.8	Note from Appellants Retail consultant Appendix 37b
ASL	10.9	Letter from NJL consultants dated 16 <sup>th</sup> August 2013
Third Party	10.10	Extract of speech – reference to Local Government Association in response to Portas Review
Third Party	10.11	Statement from Stour United Businesses
Third Party	10.12	Survey responses from Stour United Businesses 2012
Third Party	10.13	Survey responses from Stour United Businesses 2014
ASL	10.14	Hand note – re: photomontages
ASL	10.15	3D perspective of site
ASL/SDC	10.16	Planning statement – agreement of details
ASL	10.17	IMI Norgren REM matters plans – Planting Plan - Overview
ASL	10.18	IMI Norgren REM matters plans – Vegetation removed plan
COOP	10.19	Plans for Shipston Co-Op expansion
COOP	10.20	Closing Statement from Co-Op
SDC	10.21	Closing Statement from LPA
ASL	10.22	Closing Statement from Appellants
SDC/ASL	10.23	Conditions
SDC/ASL	10.24	S.106 Agreement
SDC	10.25	CIL Justification
ASL	10.26	Response to Co-Op closing statement from appellants
Third Party	10.27	Cllr Cheney comments
ASL	10.28	Appellants list of plans

APPENDIX 7 – POLICY MD2 SCHEDULE AND SUGGESTED CHANGES

*Schedule Comments on Parts of Policy MD2.*

Part	Topic	Comment	Suggested Wording
Key Land Use and Infrastructure Requirement			
1	Location and confirmation of removal of land from the Green Belt	Support/Minor Amend.	Land to the south east of Warrington, bounded by the M56 to the south and predominantly the A50 to the east ( <u>as illustrated on the supporting Proposals Map and Figure 3</u> ), will be removed from the Green Belt and allocated as the Garden Suburb sustainable urban extension.
2	Nos of homes and employment overall and in plan period.	Object. The Centre should be referenced in this part and must be renamed as either a District/Local Centre. Reference to a Neighbourhood Centre is not consistent with the NPPF and Local Plan Glossary definitions. See objection to Policy DEV5.	The Garden Suburb will deliver approximately 7,400 homes, <del>and</del> 116 hectares of employment land, <u>and a centrally located District/Local Centre and other supporting uses.</u> Around 5,100 homes, <u>the centre</u> and all of the employment land will be delivered within the Plan Period.
3	Development Concept and Diagram	Object. Diagram is only very indicative and therefore adds little to the policy requirement. Moreover, Garden Suburb needs to be subject to more detailed workings to be addressed through a separate Development Framework and consultation process.	The Garden Suburb will comprise three Garden Villages, a central <del>Neighbourhood</del> <u>District/Local</u> Centre, a significant employment zone and an extensive green infrastructure network of open spaces and parkland, <del>as illustrated in the Development Concept diagram.</del>
4	Appleton Thorne separation and Neighbourhood Plan	Support/Minor Amend. The Neighbourhood Plan area does not cover land controlled by Taylor Wimpey. However, it does cover a large area within the Garden Suburb proposal. The new Local Plan will supersede the Neighbourhood Plan. Whilst we see merit in retaining pertinent Neighbourhood Plan policies for the existing urban area of the settlement, the status of the Neighbourhood Plan in the context of	The existing inset settlement of Appleton Thorn will retain its distinct identify and be defined by areas of countryside separating the settlement from new development.  Any development within the Appleton Thorn settlement boundary, <u>as defined by Map 2 in the Neighbourhood Plan (or Proposals Map to the Local Plan)</u> , must conform with the policies of the Appleton Parish Thorn Ward Neighbourhood Development Plan.

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		other land surrounding the settlement should be made explicitly clear in the supporting text to this policy and the settlement boundary should be clearly defined in this policy by way of reference to a plan.	
5	Infrastructure <i>(and Development Framework)</i>	Support the principle of an infrastructure list in the policy but make comments on each below and suggest the concept of the Development Framework is introduced in this part of the policy.	The Garden Suburb will be supported by a wide range of infrastructure <del>as follows,</del> <u>and delivered in a coherent and comprehensive manner to ensure one development proposal does not prejudice another.</u> A <u>Development Framework Supplementary Planning Document (SPD) will be prepared and consulted upon to guide the development of the site and provide for the following:</u>
5a	Range of Homes	Support/Minor Amend.	A range of housing tenures, types and sizes, including affordable homes, custom and self-build plots and supported and Extra Care housing <u>in accordance with Policy DEV2.</u>
5b	Primary Schools	Support/Minor Amend. The evidence base in relation to the precise quantum of need is not available at this stage so question the need to be specific on number of forms in the policy.	<del>A minimum of an additional 7 forms of entry of</del> <u>Additional</u> Primary School provision
5c	Secondary School	Support/Minor Amend. The evidence base in relation to the precise quantum of need is not available at this stage so question the need to be specific on number of forms in the policy.	<del>A new Additional Secondary School to provide a minimum of 6 forms of entry provision</del>
5d	Neighbourhood Centre	See Objection to Policy DEV5 and supporting Retail & Town Centre Use Assessment at Appendix 3.	<del>A Neighbourhood</del> <u>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</u>

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			facility, leisure facilities and other community facilities.
5e	Local Centres	See Objection to Policy DEV5 and supporting Retail & Town Centre Use Assessment at Appendix 3.	Three <del>Local Centres</del> <u>small Neighbourhood Centres/hubs located centrally in each of the three Garden Villages</u> providing local shops and other community facilities <u>of no more than 500 sq m floorspace in total unless supported by a Retail Impact Assessment in line with Policy DEV5.</u>
5f	Country Park (Green Infrastructure)	Support/Minor Amend.	<u>Extensive areas of Green Infrastructure, including a major new Country Park and and extensive areas of strategic green infrastructure and provision of playing pitches</u> <del>provision of a range of smaller areas of open space within the residential development</del> to serve the new <u>and wider</u> community <u>and open space within residential developments</u> in accordance with <u>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.</u>
5g	Playing Pitches	Support but included above in amended MD2.1.5f.	<del>Provision of playing pitches.</del>
5h	Open Space	Support but included above in amended MD2.1.5f.	<del>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.</del>
5i	Gypsy & Traveller	No comment other than location should be set out in the Development Framework.	A Gypsy and Traveller site with the capacity for 8 pitches.
5j	Recycling Centre	No comment other than location should be set out in the Development Framework.	A Community Recycling Centre.
5k	Transport Improvements	Support/Critical Amend. It will be critical that planned routes set out in the Development Framework can be delivered without undue hindrance (i.e. by making sure detailed	A comprehensive package of transport improvements, for both on-site and off- site works <u>including the delivery of a network of routes for a range of modes that allow for connections between</u>

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		development proposals provide connections up to site boundaries where necessary to create a link).	<u>development sites to be made effectively and efficiently.</u>
5l	Landscape / Ecology	Support.	Landscape buffers and ecological mitigation and enhancement.
5m	Flood/Drainage	Object. The Garden Suburb covers a very large and diverse area. It is not conceivable that every single development proposal within the area is capable of delivering 'exemplary suds' and some development will have to connect to combined sewers in some instances.	<u>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.</u>
Delivery and Phasing			
6	Development Framework	Support/Minor Ammend.	The Council is committed to working with landowners / developers to prepare <del>a</del> <u>the</u> Development Framework <u>SPD</u> for the Garden Suburb as a whole, including more detailed masterplans for each of the three Garden Villages and the <del>Neighbourhood</del> <u>District/Local</u> Centre, together with a delivery strategy and phasing plan in order to ensure comprehensive and coordinated development.
7	SPD	Not necessary. Repetitive text further to suggested change at Part 5.	<del>The Development Framework will be prepared as a Supplementary Planning Development (SPD).</del>
8	Infrastructure Delivery / Green Infrastructure Strategy / Foul and Surface Water Strategy / Clean Water Strategy	Not necessary. Repetitive text further to suggested change at Part 5.	<del>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.</del>

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9	Masterplans	Support but combine with 10	<p><del>The</del> Masterplans within the Development Framework <u>SPD</u> 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. <u>The masterplans will provide the basis for planning applications for individual development parcels.</u></p>
10	Masterplans	See comment to Part 9	<p><del>The masterplans will provide the basis for planning applications for individual development parcels.</del></p>
11	Delivery Strategy	Support/Slight Amend. It is critical that the delivery/funding mechanism is included in the Development Framework.	<p><del>The delivery strategy</del> <u>The Development Framework SPD</u> must ensure that a <u>delivery strategy, including a programme of delivery, and funding</u> 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.</p>
12	SPD process	Not necessary. Repetitive text further to suggested change at Part 5 and point can be made in supporting text.	<p><del>The SPD will conform to the requirements of this Policy and be subject to public consultation. Landowners / developers will be expected to work closely with the Council to ensure that the SPD is deliverable.</del></p>
13	First Phase	No objection.	<p>The first phase of residential development comprises <b>Homes England’s sites at Grappenhall Hayes, Appleton Cross and Pewterspear</b> that already have planning permission.</p>
14	Funding Phasing /	Support/Slight Amend. The funding and programme objectives set out under Part 14 should be a priority for the Development Framework. See comments on Part 11. We have also added a cavate that allows for some flexibility in	<p>No further residential development will be permitted until the <u>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</u></p>

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		light of the fact that Taylor Wimpey control much of the land where essential highway, education and other community infrastructure is provisionally proposed to come forward in the Draft Development Framework and we have started to work with surrounding landowners that control land within the suggested Country Park location.	<u>the development and the wider objectives of this policy:</u>
14a	Country Park Funding	See above comment to Part 14.	The funding <u>mechanism</u> and programme for delivery of the Green Infrastructure Network including Country Park have been confirmed.
14b	Strategic Link Funding	See above comment to Part 14.	The funding <u>mechanism</u> and <del>the</del> programme for the delivery of a strategic link to connect the Garden Suburb to the local and strategic road network have been confirmed.
14c	Community Infrastructure in Centre	See above comment to Part 14.	The funding and <del>the</del> programme for the delivery of community infrastructure within the <del>Neighbourhood District/Local</del> Centre have been confirmed.
14d	Community Infrastructure in Villages	See above comment to Part 14.	Where development is within one of the Garden Villages, the funding <u>mechanism</u> and <del>the</del> programme for the delivery of the community infrastructure within the relevant Garden Village have been confirmed.
15	Employment Phasing	Support. However, we note that there are current applications and appeals in place, so this part of the policy will need to be reviewed going forward.	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.

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16	Later Phasing / Infrastructure	No objection but could be included in supporting text or within the Development Framework.	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.
17	Restriction on development until future review	Object. It is unclear which phases are being referred to and there might be sound reasons to permit development without a formal review in place. This part of the policy should be omitted.	<del>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.</del>
Detailed Site-Specific Requirements			
<i>New Homes</i>			
18	New Homes Locations	Object. The Council commit to working closely with landowners and developers to prepare the Development Framework and masterplans in Part 6 but then prescribe quite precise number of homes and their location within this part. 500 homes will not support the range of uses sought within the District/Local Centre and therefore we strongly believe a greater concentration of homes should be provided around the Centre. It is also consider the Centre should be developed more closely with Village C noting the extent of Taylor <b>Wimpey's land control in this village</b> too. We have started to prepared a masterplan which illustrates this central part of the site can deliver the range of uses sought by the Council.	New homes will be delivered in the Garden Suburb across the following <del>broad locations/:</del> <u>areas to be agreed set out</u> in the <del>agreed</del> Development Framework SPD. <u>Initial master planning work suggests the following locations might could accommodate the following:</u> <ul style="list-style-type: none"> <li>a. Grappenhall Heys – approximately 2,800 homes (2,100 within the Plan Period)</li> <li>b. Appleton Cross / Pewterspear – approximately 2,100 homes (1,500 within the Plan Period)</li> <li>c. New Garden Village <del>adjacent to A50 and central District/Local Centre</del> <u>2,500 homes-</u> (approximately <del>1,800 homes (1,000 ,500</del> within the Plan Period)</li> <li>d. <del>Garden Suburb Neighbourhood Centre—</del> approximately 700 homes (500 within the Plan Period)</li> </ul>
19	Range of Homes	Repetitive and not necessary in light of suggested change to Part 5a.	<del>A range of housing tenures, types and sizes will be required in order to ensure</del>

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			development contributes to meeting the <del>Borough's general and specialist housing</del> needs, including family homes with gardens, specific provision for older people and for younger people looking to purchase their first home.
20	Affordable Homes	Repetitive and not necessary in light of suggested change to Part 5a.	In accordance with Policy DEV2 a minimum of 30% of homes should be affordable.
21	Elderly Housing	Repetitive and not necessary in light of suggested change to Part 5a.	Supported housing for older people should be provided within each of the three Garden Villages.
22	Extra Care	Object. The precise location for this use should stem from the Development Framework and master planning exercise and not be prescribed in this policy.	Specific provision should be made for a residential care facility providing a minimum of 80 bed spaces with in close proximity to the Neighbourhood District/Local Centre. Extra Care provision will also be supported in each of the three Garden Villages.
23	Self Build Homes	Repetitive and not necessary in light of suggested change to Part 5a.	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.
24	Gypsy & Travellers	Repetitive and not necessary in light of Part 5i.	Specific provision should be made for a Gypsy and Traveller site with the capacity for 8 pitches within the Garden Suburb.
25	Density	No objection but also suggest density might be best dealt with following further progress on the Development Framework and supporting masterplans.	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.
26	Density in Centre	No objection/slight amend but also suggest density might be best dealt with following further progress	To reflect the proximity to services and greater distance from heritage and ecological constraints, residential

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		on the Development Framework and supporting masterplans.	development within <del>the Neighbourhood</del> <u>and in proximity to the District/Local</u> Centre should be at higher residential densities, with an average minimum density of 30dph based on gross site area.
<i>Employment Areas</i>			
27	Location	No objection/Slight Amend	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, <u>as illustrated on the Proposals Map.</u>
28	Uses	Object. The parcel of allocated employment land located north of the M6 junction would lend itself to a range of other suitable employment uses including B8, B2 and B1c but other road side uses such as a Petrol Station could also be justified in this location. The later would assist in reliving some pressure on the roundabout near Lymm Truck Stop.	The employment land is allocated for distribution and industrial uses (B8, B1c and B2). <u>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.</u>
<i>Community Facilities</i>			
29	NC: Schools	Object. Repetitive text and not necessary in light of suggested change at Part 5b and 5c and associated objection.	<del>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.</del>
30	NC: Health / Community Facilities	Object. Repetitive text further to suggested change at Part 5d and associated objection.	<del>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.</del>
31	NC: Location of Secondary	Object. The precise location for these uses should stem from the	The secondary school, a new primary school, <del>and the combined</del> health and

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	School and Community Facilities	<p>Development Framework and master planning exercise and not be prescribed in this policy.</p> <p>The Centre should be renamed as either a District/Local Centre. Reference to a Neighbourhood Centre is not consistent with the NPPF and Local Plan Glossary definitions. See objection to Policy DEV5.</p>	<p>leisure facilities <del>shy</del> should be located <u>within or in proximity</u> to the <del>Neighbourhood</del> <u>District/Local Centre</u>.</p>
32	NC: Location	<p>Repetitive text further to suggested change at Part 5d.</p>	<p><del>The Neighbourhood Centre will serve the entire Garden Suburb and should be located in a central location within the overall allocation site.</del></p>
33	NC: Facilities and Impact	<p>Repetitive text further to suggested change at Part 5d.</p>	<p><del>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.</del></p>
34	LC: Primary Schools	<p>Support/slight amend further to suggested change at Part 5e.</p>	<p>A new or extended primary school should be located within or in proximity to the <del>Local</del> <u>small Neighbourhood Centres/hubs</u> in each of the three Garden Villages.</p>
35	LC: Locations	<p>Repetitive text further to suggested change at Part 5e.</p>	<p><del>The new Local Centres will provide focal points for the proposed villages and should be located centrally within these areas.</del></p>
36	LC: Facilities and Impact	<p>Repetitive text further to suggested change at Part 5e.</p>	<p><del>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.</del></p>

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37	Appleton LC: Health Facility	Support/slight amend further to suggested change at Part 5e.	The <del>Local Centres</del> <u>small Neighbourhood Centre/hub</u> in Appleton Cross will be required to provide a new health facility.
<i>Green Infrastructure Network</i>			
38	Green Infrastructure Strategy	Support.	The Development Framework <u>SPD</u> and Green Infrastructure Strategy will define the Strategic Green Infrastructure Network and set out how it will be delivered <u>and protected thereafter</u> .
39	Green Infrastructure Strategy: Purpose	Support/slight amend further to suggested change at Part 5d.	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 <del>Neighbourhood</del> <u>District/Local</u> Centre, Appleton Thorn and the Employment Area within the Garden <b>Suburb and provide links into Warrington’s wider green space network <u>and a Country Park within the Garden Suburb.</u></b>
40	Green Infrastructure Network Diagram	Object. Diagram is only very indicative and therefore adds little to the policy requirement. Moreover, a separate Green Infrastructure Strategy to be included in the Development Framework and consultation process.	<del>An illustration of the Strategic Green Infrastructure Network is shown on the development concept diagram.</del>
41	Country Park Location	Object. The precise location for this use should stem from the Green Infrastructure Strategy, Development Framework and master planning exercise and not be prescribed in this policy. Furthermore, this is repetitive and not required in light of Part 5f.	<del>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.</del>
42	Country Park Design	Repetitive further to amendment to part 39	<del>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</del>

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			as existing residents across wider southern and central Warrington.
43	Open Green Spaces: Garden Suburb	Support.	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 <del>separation</del> <u>connectivity</u> between the <del>individual Garden Villages, the Neighbourhood Centre and Appleton Thorn.</del> <u>Component parts of the Garden Suburb.</u>
44	Green Infrastructure Network: Protection	Not necessary and repetitive in light of Policy DC3 – Green Infrastructure.	Once defined, development will not be permitted which compromises the function of the Strategic Green Infrastructure Network.
45	Open Green Spaces: Garden Villages and NC	Not necessary. Repetitive text further to suggested change at Part 5f.	<del>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.</del>
46	LEAPs and NEAPs	Not necessary. Repetitive text further to suggested change at Part 5f.	The delivery of equipped play provision <del>should be in the form of a range of LEAP's and NEAP's (including the appropriate 20 or 30 metre buffers)</del> on the application site.
47	Open Space: Employment Area	Not necessary and repetitive in light of Part 43.	Further provision of open space will be required within the proposed Employment Area.
48	Management	Not necessary and repetitive in light of Policy DC3 – Green Infrastructure.	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.

<i>Natural Environment</i>			
49	Wildlife Corridors	Support.	The Development Framework <u>SPD</u> and Green Infrastructure Strategy will need to demonstrate how development within the Garden Suburb will protect and enhance existing wildlife corridors and provide <b>new corridors to link the site into Warrington’s wider biodiversity network</b> and the Great Manchester Wetlands Nature Improvement Area and ensure the site contributes to the wider objectives of the Northern Forest.
50	Landscape Features	Support.	The layout of development within the Garden Suburb should take account of existing landscape features, including watercourses, woodlands and significant hedgerows.
51	Wetland Habitats	Support.	Wetland habitats including ponds within the site are of key importance and should be integrated within the Strategic Green Infrastructure Network.
52	Habitat Mitigation	Support/Slight Amend given Policy DC4 – Ecological Network.	Where an individual development parcel will result in the loss of habitat, approval of a plan of mitigation <u>in line with Policy DC4</u> will be required before any application for that development parcel is permitted. <del>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.</del>
<i>Green Belt Boundary</i>			
53	GB Boundary	Not necessary. Repetitive text further to suggested change at Part 1.	<del>The Green Belt boundary to the south of the Garden Suburb is defined by the M56 and to the east predominantly by the A50 (Knutsford Road).</del>

54	Development at GB Boundary	Not necessary in light Policy DC5 – Quality of Place and ambiguous. Furthermore, the masterplans within the Development Framework will identify suitable development at the boundary.	<del>Development at the eastern and southern extents of the Garden Suburb will be required to respect the Green Belt boundary.</del>
<i>Transport and Accessibility</i>			
55	Transport Improvement	Support/ amend further to suggested change at Part 5d and 5e and cross reference to the Development Framework.	<p>A comprehensive package of transport improvements will be required to support the Garden Suburb <u>and will be detailed within the Development Framework (SPD)</u>. Required improvements for the next phase of residential development and the employment development will include:</p> <ul style="list-style-type: none"> <li>a. Ensuring appropriate access arrangements for the site as a whole and for individual development parcels.</li> <li>b. Improved cycling and walking routes well related to the green infrastructure network; connecting the new and existing residential areas, the <u>District/Local Neighbourhood Centre</u>, <u>the small Neighbourhood Centre/hubs Local Centres</u> within the Garden Villages and the Employment Area.</li> <li>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.</li> <li>d. A new strategic link connecting the individual villages and the <u>Neighbourhood District/Local Centre</u> within the Garden Suburb itself and providing additional connections from the Garden Suburb to the A49 and A50.</li> </ul>

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			<p>e. Improvements to increase capacity at Junctions 9 and 10 of the M56 and Junction 20 of the M6.</p> <p>f. Other network improvements as identified by an appropriate Transport Assessment.</p>
56	Footpaths and cycleways	Not necessary in light of Part 55 and Policy INF1 – Sustainable Travel and Transport.	<del>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.</del>
57	Accessibility to Public Transport	Not necessary in light of Part 55 and Policy INF1 – Sustainable Travel and Transport.	<del>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.</del>
58	Bridgewater Canal	Amend so that it is clear how the development as a whole will contribute towards this wider aspiration.	<u>The Development Framework SPD will set out how</u> the development should <b>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.</b>
<i>Utilities and Environmental Protection</i>			
59	Foul and Surface Water Strategy	Not necessary. Repetitive text further to suggested change at Part 5m.	<del>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</del>

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			Garden Village which is downstream from existing communities at risk of flooding in Grappenhall.
60	Integration with Green Infrastructure Strategy	Not necessary in light of the suggested change at section 5m; the Development Framework will tie together the Foul and Surface Water Strategy and Clean Water Strategy and the Green Infrastructure Strategy.	<del>The surface water strategy should be integrated with the site's Green Infrastructure Strategy in order to maximise ecological and potentially recreational benefits.</del>
61	Water Supply and Sewerage Network	Not necessary. Repetitive text further to suggested change at Part 5m.	<del>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.</del>
62	Gas Pipeline	Slight amendment.	Development within the Garden Suburb must not <u>unduly</u> impact on the operation of the existing gas pipeline which crosses the site.
63	Community Recycling Centre	Object. The requirement for the Community Recycling Centre is set out in Part 5j and the location should be set out in the Development Framework.	<del>A Community Recycling Centre to serve the Garden Suburb and the wider south Warrington area should be provided within the Garden Suburb.</del>
64	Decentralised Energy System	Repetitive / not necessary in light of Policy ENV7 – Renewable and Low Carbon Energy Development.	<del>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.</del>
65	Groundwater	Repetitive / not necessary in light of Policy ENV8 – Environmental and Amenity Protection.	<del>Development proposals may be required to assess the impact on the groundwater environment and incorporate appropriate mitigating measures.</del>

66	Noise and Air Quality	Repetitive / not necessary in light of Policy ENV8 – Environmental and Amenity Protection.	<del>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.</del>
<i>Historic Environment</i>			
67	Conserve and Enhance	No comment.	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	Bradley Hall	No comment	The Bradley Hall Moated Site Ancient Monument is of particular significance given its location within the Employment Area. <u>Masterplans within the Development Framework SPD will incorporate a landscape buffer between the monument and new employment development</u> <del>will be required</del> to preserve the immediate open setting of the moated site.
69	Conservation Areas	No comment.	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.

## Key Land Use and Infrastructure Requirement

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 supporting 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 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 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~~ 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.
  - 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.~~
  - ~~b. Provision of~~ playing pitches -  
  
Provision of a range of smaller areas of open space within the residential development 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.
  - f. A Gypsy and Traveller site with the capacity for 8 pitches.

- g. A Community Recycling Centre.
- h. 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 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.

#### Delivery and Phasing

- 6. The Council is committed to working with landowners / developers to prepare athe 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 with a delivery strategy and phasing plan in order to ensure comprehensive and coordinated development.
- ~~7.—The Development Framework will be prepared as a Supplementary Planning Development (SPD).—~~
- ~~8.—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.—~~
- ~~9.7.~~ The 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.
- ~~10.—The~~ masterplans will provide the basis for planning applications for individual development parcels.
- ~~11.8.~~ The delivery strategy 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.
- ~~12.—The~~ SPD will conform to the requirements of this Policy and be subject to public consultation. Landowners / developers will be expected to work closely with the Council to ensure that the SPD is deliverable.
- ~~13.9.~~ The first phase of residential development comprises Homes England's sites at Grappenhall Hayes, Appleton Cross and Pewterspear that already have planning permission.
- ~~14.10.~~ 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:

~~e.a.~~ The funding mechanism and programme for delivery of the Green Infrastructure Network including Country Park have been confirmed.

~~e.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.

~~e.c.~~ The funding mechanism and ~~the~~ programme for the delivery of community infrastructure within the Neighbourhood District/Local Centre have been confirmed.

~~f.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.

~~15.11.~~ 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.

~~16.12.~~ 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.

~~17. 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.~~

## Detailed Site Specific Requirements

### *New Homes*

~~18.13.~~ New homes will be delivered in the Garden Suburb across the following broad locations ~~:- areas to be agreed set out in the agreed Development Framework SPD. Initial master planning work suggests the following locations might could accommodate the following:~~

- 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)

~~a.~~ New Garden Village adjacent to A50 and central District/Local Centre 2,500 homes (approximately 1,800 homes ~~(1,000)~~ 500 within the Plan Period)

~~b.~~ Garden Suburb Neighbourhood Centre approximately 700 homes (500 within the Plan Period)

~~19. 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.~~

~~20. In accordance with Policy DEV2 a minimum of 30% of homes should be affordable.~~

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

~~21.14.~~ Specific provision should be made for a residential care facility providing a minimum of 80 bed spaces within close proximity to the Neighbourhood District/Local Centre. Extra Care provision will also be supported in each of the three Garden Villages.

~~22. 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.~~

~~23. Specific provision should be made for a Gypsy and Traveller site with the capacity for 8 pitches within the Garden Suburb.~~

~~24-15.~~ **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.**

~~25-16.~~ **To reflect the proximity to services and greater distance from heritage and ecological constraints, residential development within [the Neighbourhood and in 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 Areas*

~~26-17.~~ **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.](#)**

~~27-18.~~ **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*

~~28. 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.~~

~~29. 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.~~

~~30-19.~~ **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.**

~~31. The Neighbourhood Centre will serve the entire Garden Suburb and should be located in a central location within the overall allocation site.~~

~~32. 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.~~

~~33-20.~~ **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.**

~~34. The new Local Centres will provide focal points for the proposed villages and should be located centrally within these areas.~~

~~35. 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.~~

~~36-21.~~ The Local CentreThe small Neighbourhood Centre/hub in Appleton Cross will be required to provide a new health facility.

#### *Green Infrastructure Network*

~~37-22.~~ 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.

~~38-23.~~ 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 NeighbourhoodDistrict/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.

~~39.~~ An illustration of the Strategic Green Infrastructure Network is shown on the development concept diagram.

~~40.~~ 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.

~~41.~~ 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.

~~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 connectivity between the individual Garden Villages, the Neighbourhood Centre and Appleton Thorncomponent parts of the Garden Suburb.

~~42.~~ Once defined, development will not be permitted which compromises the function of the Strategic Green Infrastructure Network.

~~43.~~ 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.

~~44.~~ 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.

~~45.~~ Further provision of open space will be required within the proposed Employment Area.

~~46.~~ 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.

#### *Natural Environment*

~~47-24.~~ 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.

~~48-25.~~ The layout of development within the Garden Suburb should take account of existing landscape features, including watercourses, woodlands and significant hedgerows.

~~49-26.~~ Wetland habitats including ponds within the site are of key importance and should be integrated within the Strategic Green Infrastructure Network.

~~50-27.~~ 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.~~

#### ~~Green Belt Boundary~~

~~51.~~ The Green Belt boundary to the south of the Garden Suburb is defined by the M56 and to the east predominantly by the A50 (Knutsford Road).

~~52.~~ Development at the eastern and southern extents of the Garden Suburb will be required to respect the Green Belt boundary.

#### *Transport and Accessibility*

~~53-28.~~ 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 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.

~~54.~~ 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.

~~55.~~ 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.

~~56-29.~~ [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*

~~57. 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.~~

~~58. The surface water strategy should be integrated with the site's Green Infrastructure Strategy in order to maximise ecological and potentially recreational benefits.~~

~~59. 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.~~

~~60-30.~~ Development within the Garden Suburb must not unduly impact on the operation of the existing gas pipeline which crosses the site.

~~61. A Community Recycling Centre to serve the Garden Suburb and the wider south Warrington area should be provided within the Garden Suburb.~~

~~62. 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.~~

~~63. Development proposals may be required to assess the impact on the groundwater environment and incorporate appropriate mitigating measures.~~

~~64. 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.~~

### *Historic Environment*

~~65-31.~~ 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.

~~66-32.~~ ~~The Bradley Hall Moated Site Ancient Monument is of particular significance given its~~ ~~68.~~ 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 ~~will be required~~ to preserve the immediate open setting of the moated site.

~~67-33.~~ 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.

## Key Land Use and Infrastructure Requirement

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 supporting 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 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.
  - 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.

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.
  - f. A Gypsy and Traveller site with the capacity for 8 pitches.
  - g. A Community Recycling Centre.
  - h. 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.

#### 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.

#### 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 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 Areas*

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.
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*

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

#### *Historic Environment*

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.

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.
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.

APPENDIX 8 – SAVILLS LETTER ON BEHALF OF WORKING GROUP

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

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**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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WARRINGTON PROPOSED SUBMISSION VERSION LOCAL  
PLAN 2017-2037 CONSULTATION

REPRESENTATION BY TAYLOR WIMPEY (UK) LTD

LAND WEST OF STOCKS LANE, PENKETH

Date: 17/06/2019

Pegasus Reference: RD | P16-0574 | R007v3

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## 1. INTRODUCTION

- 1.1 Pegasus Group are instructed by Taylor Wimpey (UK) Ltd to make representation to the Warrington Proposed Submission Version Local Plan 2017-2037 consultation, which ran between 15 April and 17 June 2019.
- 1.2 Taylor Wimpey have a controlling interest in 30.1 Ha of land to the west of Stocks Lane, Penketh. Taylor Wimpey have legal control of the site and are seeking to promote it for residential development through the Local Plan process. The full extent of the site is illustrated below.
- 1.3 **Details of this site have previously been submitted to the 2016 'call for sites' process and the 2017 'Preferred Development Option Regulation 18 Consultation'.**

*Figure 1.1 – Extent of Taylor Wimpey's Promotion*



- 1.4 An initial indicative layout is provided in the Illustrative Masterplan, attached at Appendix 1, which suggests a site capacity of 600 dwellings, and further detail is provided in Section 2 of this report and the Development Statement attached at Appendix 2.
- 1.5 This document provides comments on the plan and relevant evidence base documents. The structure of these representations takes the following form:
- Section 2 summarises the key characteristics of the Stocks Lane site and proposed development;
  - Section 3 comments on the main legal requirements of the Local Plan;

- Section 4 comments on plan chapter 3 (Vision and Spatial Strategy);
- Section 5 comments on the policies within the plan that relate to housing delivery and economic growth and development;
- Section 6 summarises and concludes the representation.

1.6 This representation should be read in conjunction with the separate representations that have also been provided on behalf of Taylor Wimpey (UK) Ltd and which comment on the Garden Suburb and other policies within the Local Plan.

## 2. STOCKS LANE SITE

- 2.1 The site extends to 30.1 ha and is located to the west of the Warrington suburb of Penketh, bounded by Farnworth Road to the south and the Warrington to Liverpool railway line to the north. The site can deliver up to 600 new family and affordable homes during the next plan period (see Appendix 1).
- 2.2 **The case for allocating this site for housing development within Warrington's Local Plan Review** is clearly presented within the Development Statement (see Appendix 2) and summarised below.
- 2.3 This section sets out the **site's sustainable location, the case for Green Belt release and the exceptional circumstances that support the need to amend the Borough's Green Belt**, the deliverability of the site for open market and affordable housing and the key economic and social benefits of delivering this site for housing.

### Sustainable Location

- 2.4 The site is in a sustainable location on western edge of Penketh, approximately 1km east of the Warrington Road West Local Centre which provides local shops and facilities, and 1.5km east of the Honiton Square Neighbourhood Centre. There are also bus stops on the southern boundary of the site offering regular services to Warrington town centre, Huyton and Liverpool. A greater range of shops and facilities can be found in the nearby town centre of Warrington which is 5.5 km to the east.
- 2.5 Sankey for Penketh railway station is located approximately 2km north-east of the site, offering frequent connections to Warrington town centre, Birchwood, Manchester, Liverpool, Widnes and Liverpool South Parkway (for Liverpool Airport).
- 2.6 The Stocks Lane site is a sustainable location and accords national guidance and the Local Plan in this regard. It is demonstrated on the Sustainability Plan within the Development Statement that the following services and facilities are within a 2km walking distance of the site:
- Penketh District Centre (1.6km)
  - Co-op Food on Farnworth Road (800m) and Warrington Road (1km)
  - Spar including Post Office (1.6km)
  - Tesco Express Supermarket (2km)
  - Penketh Community Primary School (1.2km)
  - Penketh South Primary School (1.4km)
  - **Little Acorns Children's Day Nursery (1km)**
  - Penketh Health Centre (1.6km)

- Mydentist (1.1km)
- Penketh Dental Centre (2km)
- Lloyds Pharmacy (1.6km)
- True Fit Golf Centre (1.1km)
- Penketh Swimming Pool and Community Centre (1.6km)
- **Two Children's Play areas on Warrington Road (900m and 1.5km)**
- Penketh Library (1.6km)
- Penketh Swimming Pool and Community Centre (1.6km)
- The Crown and Cushion Public House (750m)
- Sportmans Arms Public House (1.2km)
- The Red Lion Public House (1.2km)
- **St Paul's Church of England Church (850m)**
- Penketh Methodist Church (1.3km)
- **St Joseph's Roman Catholic Church (1.6km)**

2.7 In addition, Penketh Secondary School is located approximately 2.3km from the centre of the site, and additional high schools are located in Great Sanky and Sankey Bridges. Two larger food stores are also **located at Sainsbury's in Great Sankey and ASDA at Westbrook.**

#### The Case for Green Belt Release

2.8 The site no longer fulfils its purpose as Green Belt land as established at paragraph 134 of the 2019 NPPF and, as such, there is a compelling case for its release. Its allocation for future development would:

- Not result in unrestricted sprawl of large built-up areas. The Warrington to Liverpool railway line and Farnworth Road form strong physical boundaries which restrict sprawl to the north and south. Whilst the site is open to the west, existing development at Doe Green to the south and Lingley Green to the north already extend out westwards making this a logical extension to Penketh, infilling and rounding off at the edge of the urban area.
- Not cause the merger of neighbouring towns. The development of the site would not close the gap between Penketh and Widnes as the closest point between the two is already established by development at Doe Green to the south, and this gap would be maintained by the proposed development.

- Not create unacceptable encroachment into the countryside. The railway line and the main road provide strong boundaries preventing encroachment north and south, and also ensure that the site is not a particularly tranquil location or one with intrinsic beauty. As such, the site currently serves little function within its countryside setting and its loss would not be unacceptable.
- Not impact on the special character of historic towns. The site is over 4km from the Warrington Town Centre Conservation Areas, and the site does not cross an important viewpoint of the Parish Church. The site is also over 4km from the Conservation Area in Widnes. There is a Grade II listed Farm (Brookside Farm) at the south west corner of the site, however, this is heavily screened by trees, and is already flanked by existing residential development, which ensures that development of the site will have minimal impact on its setting.
- Not discourage urban regeneration. As noted, the Council fully accept that there is **insufficient land within Warrington's existing urban and greenfield** sites to meet its own needs for housing and employment land going forward.

2.9 There are also exceptional circumstances which support an alteration to the Green Belt. These include:

- The lack of a sufficient housing supply to support the development needs of the Warrington Borough.
- An acute need for affordable housing and sites that have the capacity and viability to deliver new affordable homes.
- The delivery of development of up to 600 high quality new homes that will deliver significant social and economic benefits accordance with the provisions of the NPPF.
- The site is well located in terms of access to employment opportunities and local services and facilities.

2.10 Furthermore, the site has been previously identified for potential safeguarding and release from the Green Belt, within a wider area of search within the Warrington Borough Draft Plan from 1994 indicating that the Council have considered this location suitable for longer term development in the past and it must therefore be regarded as a reasonable alternative site to fully appraise and consider as part of this Local Plan process.

#### Exceptional Circumstances for Green Belt Release

2.11 Paragraph 136 of the NPPF states that once the extent of a Green Belt has been established, it should only be altered in exceptional circumstances through the Local Plan process, and the Council have acknowledged that such circumstances exist in Warrington. The exceptional circumstances which support the release of land at Stocks Lane, Penketh are set out below.

## Housing Need

- 2.12 The principal exceptional circumstances relating to the Green Belt land is directly tied to the need **to accommodate Borough's projected needs over the plan period up to 2037, and to consider growth patterns in the wider Mid-Mersey housing market area.**
- 2.13 A Strategic Housing Market Assessment for the Mid Mersey authorities (Warrington, Halton and St Helens) was produced in January 2016 and updated in May 2017. The updated report concluded that the objectively assessed need (OAN) for Warrington between 2015- 2037 is 955 dwellings per annum (dpa). This showed a 14% increase from the 2016 assessment due to an increase in the **demographic baseline and an improved economic outlook. Warrington's housing needs were also** assessed as one of 8 authorities in the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) in January 2017, which suggested a similar OAN of 949 dpa over the period 2012-2037.
- 2.14 An updated Local Housing Needs Assessment (LHNA) was published in March 2019 as part of the submission plan consultation. This generated a standard methodology figure of 909 dpa over the period 2017- 2027, to be applied to the full plan period. However, the LHNA also confirmed that 909 dpa would not support the anticipated jobs growth in the Borough and suggests an uplift to 945 dpa to achieve this. It also suggests a further uplift to 955 dpa to address affordable housing need (a 5% increase on the 909 dpa standard methodology figure).
- 2.15 The emerging Local Plan must consider the implications of not releasing sufficient land from the Green Belt, and the harm that will occur from failing to meet the identified needs in the Borough; such as slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice. Residential development at this site could start to be delivered early in the plan period and this should be considered as a key benefit of the scheme.

### *Insufficient Land*

- 2.16 It is clear within the available evidence within the Warrington SHLAA and Urban Capacity Study **that there is insufficient land within the Warrington's existing urban and greenfield sites to meet** its housing and employment land going forward, and this is further evidence of an exceptional circumstance required to release land from the Green Belt.
- 2.17 The Council fully accepts that Green Belt land will need to be released to deliver approximately 7,064 homes and 215 hectares of employment land up to 2037; whilst our calculations suggest that land for at least 10,000 will need to be released, which equating to over 50% of the total requirement.
- 2.18 **Therefore, it is clear that there is not enough land within Warrington's urban areas to meet the** future development requirements of the emerging Local Plan.

### *Affordable Housing Need*

- 2.19 The 2019 Local Housing Needs Assessment identifies a net affordable need of 377 dpa, which has increased by over 70% since the 2016 Mid-Mersey SHMA target of 220 dpa and 120% since the 2014 Core Strategy target of 172 dpa. This suggests that affordable delivery is not keeping pace with demand and is reflected in the 2018 AMR which notes that there were only 82 affordable completions in 2017/18 and 72 affordable completions 2016/17. As such, there is a clear lack of affordable homes within the Borough.
- 2.20 It is evident that the delivery of large sites such as Stocks Lane, Penketh, which are viable, deliverable and available, will make a significant contribution to affordable needs within the borough, and this represents another exceptional circumstance.

### *Deliverability*

- 2.21 The NPPF and NPPG specify that local planning authorities supply sufficient specific deliverable sites. As stated in Annex 2 of the NPPF, to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on site within five years. Paragraph 73 enforces local planning authorities to identify and update annually a supply of deliverable sites to provide a minimum of **five years'** supply of housing against their housing requirement.
- 2.22 To be considered deliverable, sites should, at the point of adoption of the relevant local development document:
- Be available: there is confidence that there are no legal or ownership problems.
  - Be suitable: offer a suitable location for development and would contribute to the development of sustainable and mixed communities.
  - Be achievable: there is a reasonable prospect that housing will be developed on the site at a particular point in time.

- 2.23 This is a judgement about the economic viability of a site and the capability of a developer to provide housing within a defined period, taking into account marketing, cost and deliverability factors.

### *Available*

- 2.24 Taylor Wimpey UK Ltd has legal control of the site and is seeking to develop the site at the earliest opportunity. The site is therefore in the control of a major national housebuilder and could deliver up to 600 new homes that will be critical to meeting housing need during the Plan Period.
- 2.25 If the site were to be released from the Green Belt and allocated for housing, Taylor Wimpey would **seek to develop the site immediately, which would contribute considerably to the Borough's 5-year housing land supply and deliver highly anticipated new homes early in the Plan Period.** This

**commitment to delivery is demonstrated by Taylor Wimpey's track record of the efficient delivery of high quality greenfield housing schemes across the North West.**

2.26 This is particularly relevant in Warrington, where the Council need to provide the additional dwellings required to support growth in the borough.

*Suitable*

2.27 The site is suitable for housing development because it:

- Offers a suitable location for development and can be developed now;
- Would consolidate and round-off the settlement to the west of Penketh, making use of the existing physical boundaries of the Liverpool to Warrington Railway line and the A5080;
- Can utilise existing infrastructure surrounding the site with no utilities or drainage constraints preventing the site coming forward for development;
- Can accommodate satisfactory vehicular access, existing bus stops are in close proximity and the local highway can accommodate the provision of up to 600 additional dwellings;
- Will deliver generous areas of open space and parkland for use by residents and the local community;
- Is not subject to any ecological or environmental constraints preventing development on the site;
- Is not located in any particularly sensitive landscape areas; and,
- Is sustainably located with several local facilities within walking distance of the site boundary, including a primary school, shops, and recreation uses.

2.28 The site is therefore suitable in accordance with the NPPF.

*Achievable*

2.29 The delivery of approximately 600 dwellings would make a significant contribution towards meeting the housing needs of the Borough. An assessment of the site constraints has been undertaken which illustrates that delivery of the entire site is achievable and deliverable, and a professional team of technical experts has been appointed to underpin this assessment and support the delivery of the site moving forward. Where any potential constraints are identified, Taylor Wimpey has considered the necessary mitigation measures and required investment in order to overcome any deliverability barriers.

2.30 Taylor Wimpey has reviewed the economic viability of the proposal in terms of the land value, attractiveness of the locality, potential market demand and the projected rate of sales in Warrington; as well as the cost factors associated with the site including preparation costs and site constraints. Where potential constraints have been identified; Taylor Wimpey has considered the

necessary mitigation measures and will use investment in order to overcome any deliverability barriers.

- 2.31 Taylor Wimpey can, therefore, confirm that the development of the site is economically viable in accordance with the NPPF and NPPG. As a consequence, the company is committed to investing in the site and is confident that it will assist with the delivery of residential development early in the plan period.

#### Key Benefits

##### *Economic Benefits*

- 2.32 The development of the site will contribute to building a strong, responsive and competitive economy. In particular, the development of up to 600 dwellings will secure a number of economic benefits in terms of job creation, tax revenues to the Council and increased expenditure in the local economy.
- 2.33 Housing supply can play a key role in the flexibility of the local labour market which is an important component in local economic competitiveness and maintaining a dynamic economy. This is because a shortage of housing or lack of affordability can act as a barrier to people accessing employment opportunities or result in long distance commuting and associated sustainability impacts.
- 2.34 Specifically, the development of the Stocks Lane site will support the local labour market, and will generate the following benefits:
- Direct construction-related employment: The proposed development could support around 155 full-time equivalent jobs per annum during the construction phase (circa 12 years), in a mix of direct construction opportunities and jobs supported in the wider supply chain.
  - Contribution of construction phase to economic output: The construction of the new homes could contribute an additional £101m of gross value added (GVA) annually to the economy during the 12-year construction period.
  - Household spend: Once fully built and occupied, the households are estimated to generate expenditure in the region of £16m per annum.
  - Increased Council Tax income: The construction of the new homes could generate around £1.1 million per annum in additional Council Tax revenue, once fully developed and occupied.

##### *Community Benefits*

- 2.35 The development of the site will also perform a social role by generating the following community benefits:

- Provide a range of open market housing comprising various types to meet the needs of the local community.
- Provide up to 180 affordable homes of a range and type to meet the identified need in the Warrington area.
- Provide over 12 Ha of public open space and outdoors sports provision for future residents and the wider community. The proposals for the site can deliver integrated open space that complements and strengthens links to the existing Recreation Areas to the south.
- Assist in the provision of other facilities where there is an identified need, in accordance with development plan policies.

### Summary and Conclusions

- 2.36 The latest housing evidence demonstrates **that there is insufficient land within Warrington's existing urban areas** to meet the development needs of the Local Plan. This represents a clear exceptional circumstance for Green Belt release, which the Council fully acknowledge. Given that the Stocks Lane site does not fulfil the five purposes for including land in the Green Belt and is a sustainable and deliverable site, it is recommended that it be released from the Green Belt through the Local Plan process to help meet future housing needs.
- 2.37 The development of the site at Stocks Lane, Warrington provides a highly sustainable opportunity to support the national growth agenda and to assist in providing adequate land to deliver a new Local Plan for the Borough. The site will deliver the quantity, type and quality of homes that is required across the Borough and can demonstrate exceptional circumstances that support an alteration to the existing Green Belt without impacting on its core functions.
- 2.38 In summary, it is demonstrated above and within the Development Statement (see Appendix 2) and Landscape Note (Appendix 3) that the Stocks Lane site:
- Is sustainably located in proximity to a range of amenities, services and facilities;
  - Is supported by clear exceptional circumstances for Green Belt release, including an urgent need for new market and affordable homes, and a shortage of available land within existing urban areas;
  - Is entirely appropriate for Green Belt release and allocation as a residential development site, as it is well contained by existing physical features and forms a logical extension to the village, without compromising the core purposes of the Green Belt;
  - Is entirely suitable, deliverable and viable for housing development; and will deliver a mix of housing types, including both market and affordable homes;
  - Is not subject to any technical or environmental constraints that would prevent the delivery of housing;

- Can deliver a landscape led masterplan that complements the surrounding site context, and creates a high-quality housing development;
- Will provide a network of high quality open spaces;
- Will create a more appropriate and defensible Green Belt boundary to the west of Penketh; and,
- Generates significant socio-economic benefits by providing housing choice, and stimulating job creation and economic investment. Increased consumer spending will also help to support additional shops and services within the Warrington Road Local Centre, which could elevate its role as a service centre.

### 3. LEGAL REQUIREMENTS OF THE PLAN

3.1 Within this section we cover the main legal requirements in relation to the preparation of a Local Plan including:

- The Duty to Co-operate with surrounding Local Authorities and other bodies;
- **The need to effectively consult on the Local Plan and accordance with the Council's Statement of Community Involvement;** and,
- The need to ensure the Local Plan seeks to reduce the threat of climate change and delivers Sustainable Development (informed through the preparation of a Sustainability Assessment and Habitat Regulations Assessment), as defined by national policy and guidance.

3.2 Ultimately, we consider the Council have passed these legal requirements insofar as they represent an ongoing, iterative process.

#### Duty to Co-operate

3.3 It would appear that the Council have undertaken the necessary requirements under the Duty to Co-operate obligations with neighbouring Local Authorities. However, as noted above, this is an ongoing duty and will need to be reviewed following the Regulation 19 consultation. We therefore reserve our right to take a seat at the examination table on this matter subject to how certain matters progress in relation to neighbouring Local Plans in terms of:

- a) The planned delivery for new required homes across the Mid-Mersey Housing Market Area; and,
- b) The planned review of Green Belt boundaries within the Halton Local Plan with particular reference to the settlement of Moore and its relationship with the South West Extension in Warrington.

#### *Housing Needs*

3.1 Warrington is located within the Mid-Mersey Housing Market Area which also includes Halton and St Helens, which have all had their housing requirements informed by the Mid-Mersey Strategic **Housing Market Assessment. At paragraph 4.2 of the Council's Draft Statement of Common Ground (SOCG)**, dated July 2018, it is recognised that:

*'Other authorities in the Mid-Mersey HMA are also progressing with the preparation of their Local Plans and together, it was agreed that each authority will either meet or exceed its objectively assessed need for housing within its boundary. It is however acknowledged that the Local Plans are currently in the early stages; therefore, the authorities will keep housing need under review and address any issues arising in the future through Duty to Co-operate discussions.'*

- 3.2 Paragraph 4.3 notes that all three authorities will be meeting their own housing needs, but this will need to be carefully monitored going forward, as recognised by the Draft SOCG.
- 3.3 Critically, all three Local Plans are at a very similar stage and following similar timescales, with **St Helens' Regulation 19 Local Plan Submission Draft consultation closing on 13<sup>th</sup> May 2019** and **Halton's Regulation 19 Proposed Submission Draft consultation due to start in mid-June 2019**. As such, this could raise questions as to why a joint plan was not prepared. However, we understand that Warrington covers a range of geographies, not least it is part of the Cheshire and Warrington Local Enterprise Partnership and Warrington and St Helens now form part of the Liverpool City Region, which will ultimately see the production of a Mayoral Strategic Plan. As such, we endorse the production of three separate plans in this instance but agree that there will be a continuous need to monitor and review the process, particularly in the event that any one authority is unable to meet its own development needs.

*Green Belt Review around Halton/SW Warrington*

- 3.4 **Another particular point we wish to highlight relates to the matter at paragraph 4.12 Council's Draft SOCG, which states:**

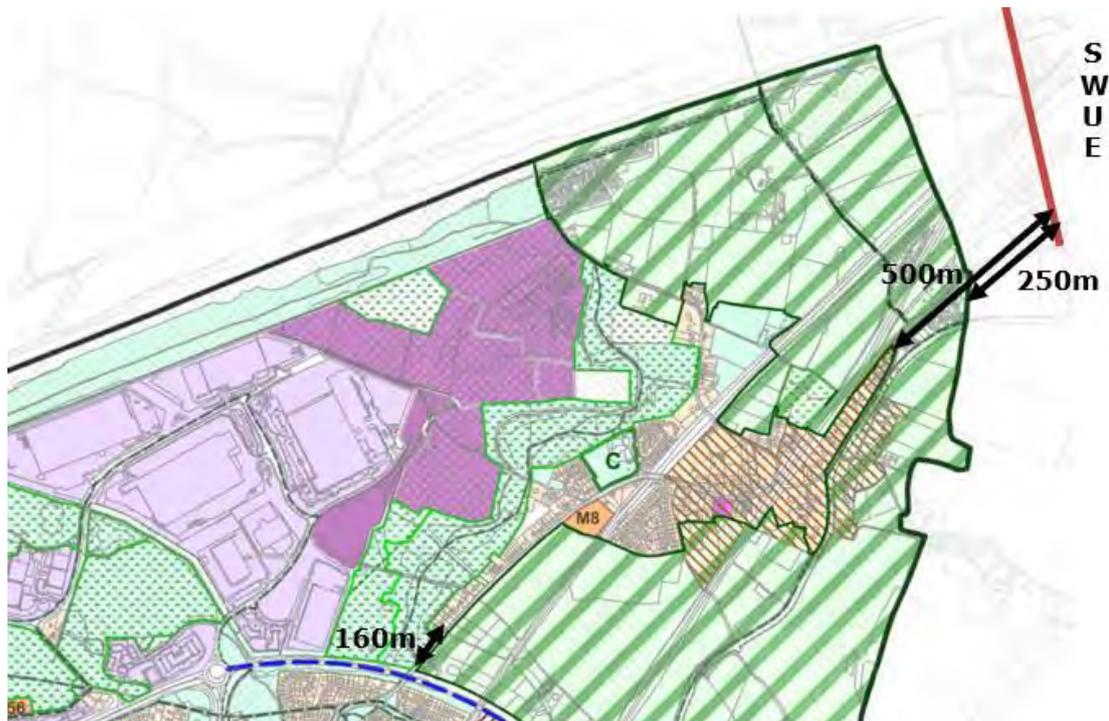
*'During the Duty to Co-operate discussions, it also became clear that both WBC and Halton Borough Council are proposing adjacent Green Belt release for development which may compromise the function of the Green Belt. In Warrington's case, this is in relation to the South West Urban Extension (proposed Green Belt release for around 1,800 homes) which is situated adjacent to the Green Belt land in Halton proposed for Green Belt release. Therefore, there is a requirement for Halton Borough Council and WBC to ensure appropriate separation between the proposed Green Belt releases adjacent to the boundary between the two boroughs. WBC will continue to work with Halton Borough Council to resolve this matter as it progresses on with its Local Plan Review.'*

- 3.5 At the time, both authorities had promoted land to be removed from the Green Belt through Regulation 18 Local Plan documents in an area south of the Manchester Ship Canal around the existing village of Moore in Halton and High Walton in Warrington i.e. the South West Urban Extension (SWUE). Both plans sought to include new development sites within these areas. The combined impact would have effectively been the merger of the main urban areas of Warrington and Runcorn, Halton.
- 3.6 On 22<sup>nd</sup> March 2019, Halton Council's planning policy officers presented their Regulation 19 Proposed Submission Draft to members of the Cabinet. This version omitted the originally proposed strategic Green Belt release sites around the village of Moore to accommodate new development, meaning the above issue is not quite a problematic as it was before. However, the issue still remains for the following reasons.
- 3.7 Firstly, the Halton Local Plan has still yet to be formally released for Regulation 19 consultation and even if submitted in its current form it could change again in the future. As such, at the very least

it is a matter that will require continued careful and considered monitoring as both Local Plans progress.

- 3.8 **Secondly, the SWUE boundary extends to the practical limits of Warrington’s jurisdiction boundary.** Beyond that boundary is an existing settlement – the village of Moore, where Warrington have no direct control over development coming forward.
- 3.9 **Thirdly, the distance between the SWUE’s western boundary (defined by Bellhouse Lane) and existing built in Moore is less than 250 metres running along Runcorn Road.** This compares to the exiting width of Green Belt between Warrington and Runcorn which is approximately 4km in this location.
- 3.10 **Fourthly, notwithstanding Halton’s deletion of their strategic allocations around Moore, their Proposed Submission Draft still seeks to remove the existing settlement of Moore from the Green Belt.** This is a perfectly appropriate response to a key change in national Green Belt policy which came in with the 2012 and 2019 NPPF (now paragraph 140), which effectively states that existing villages washed over by the Green Belt should be inset instead, which differs from the PPG2 guidance which was in force when the existing Halton UDP and Core Strategy was adopted. Indeed, the settlement of Moore is of a sufficient scale and form that requires Halton Council to consider if it should be omitted from the Green Belt when considering paragraphs 139(b) and 140 of the NPPF. Halton have correctly decided to omit the urban area of Moore from the Green Belt on the basis that it is an area of land that does not contribute the main purposes of Green Belt. Indeed, it is entirely developed and not open in character.
- 3.11 The precise settlement boundary for Moore has yet to be formally examined or adopted. However, the draft proposals map available from Halton shows that it includes existing properties and a convenience store located to the west of Runcorn Road and east of the railway line but does not include existing homes located on the south of Runcorn Road and the Cheshire Ring Canal. We could see this boundary alter during the Halton Local Plan submission or examination process on the basis that we can see no reason to omit these existing properties when considering paragraph 139(b) of the NPPF. This would result in the existing and defined settlement edge of the village being pushed closer to the SWUE boundary. This is then subsequently compounded by the fact that the existing gap between Moore and Runcorn is even narrower as illustrated on the annotated extract of the proposed Regulation 19 Halton Local Plan proposals Map at Figure 2.1.

Figure 3.1 – Halton Local Plan Proposals Map (proposed Regulation 19 version)



3.12 Finally, it is recognised that minor Green Belt gaps in both directions would continue to exist. However, we cannot rule out at this stage that some parties and landowners might reasonably object to the omission of any new development sites around Moore, particularly given the fact that such sites were included in the Regulation 18 draft of the Local Plan.

3.13 With that in mind, we re-iterate the point that it is an issue that has been highlighted in the Draft SOCG and it is one that continues to require careful monitoring and consideration as both Local Plans progresses, principally because it has significant ramifications for one of the primary purposes of Green Belt: i.e. to prevent neighbouring towns from merging into one another.

#### Community Consultation

3.14 **We have reviewed the Council’s Statement of Community Engagement. We are comfortable that** the Council have carried out the necessary consultation associated with the preparation of the Local Plan up to this current stage.

#### Sustainability Assessment (and other Site Assessment Documents)

3.15 **We have reviewed the Council’s Sustainability Assessment and are broadly comfortable with its** structure, objectives and assessment of very broad development alternatives. However, we make some general comments below and raise issue with the fact that there is no evidence of an overarching assessment of the land put forward by Taylor Wimpey at Stocks Lane despite submissions having been made to the Council in December 2016 (Reg 18 Call for Sites

Consultation), February 2017, April 2017, September 2017 (Reg 18 Preferred Development Option Consultation) and April 2018.

- 3.16 The Councils preferred approach and the one being taken forward in the plan, is broadly in-line with Option 1 in the appraisal, which considers a Garden Suburb to the south east of the Warrington of around 4,200 homes and urban extension to the south west of around 1,600 homes.
- 3.17 The Council concluded, and we generally agree, that this option is capable of meeting development needs and deliver infrastructure needed to support the development itself and contribute to the wider sustainable development of Warrington as a whole. Green Belt release can be facilitated without comprising the strategic importance of **Warrington's Green Belt as a whole, with revised boundaries likely to be robust and durable beyond the plan period.**
- 3.18 However, we note that the one area where Option 1 does not perform as well as the others is in respect of providing early housing delivery. The Council recognises that housing delivery from the Garden Suburb and South West Extension is unlikely within the early years of the Local Plan period, given the lead in times for required infrastructure to support the two urban extensions. Indeed, this is the justification for the stepped housing trajectory.
- 3.19 Whilst it is recognised that the stepped housing trajectory is linked to the anticipated lead in times of the urban extensions, which Taylor Wimpey support in terms of their allocation, it would also be prudent for the Council to assess (through the SA) a reasonable alternative that considered options to delivery additional sites to allow for a more even trajectory over the plan period.
- 3.20 Noting this point, Taylor Wimpey put forward land to the west of Penketh as a suitable residential site at various previous stages of consultation on the Local Plan. This site should therefore be considered as a reasonable alternative, particularly bearing in mind our point at paragraph 2.10 above. We are unable to find a comprehensive assessment of the site that has been undertaken by the Council.
- 3.21 The only references **to the site we are able to find in the Council's evidence base** include a passing comment in Appendix 2 of the 2018 SHLAA (under site reference 3167) **and the Council's Green Belt Assessment.** The former states:
- '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.'*
- 3.22 However, the Council had already determined that they would need to release Green Belt at this point, as cited in the Regulation 18 consultation draft of the Local Plan. The Council even considered the various sites put forward by developers and landowners within the July 2017 Green Belt

Assessment – Additional Site Assessments of Call for Site Responses and SHLAA Green Belt Sites. In this regard, there is an assessment under site reference R18/132. It is stated the site makes a **'strong contribution' to the Green Belt**. We disagree with this conclusion for the reasons set out within these representations and the supporting Development Statement. Irrespective of our disagreement in relation to the contribution the site makes to the 5 Green Belt purposes, this is not a complete or rounded assessment of the site which considers other attributes and constraints of each site.

- 3.23 Indeed, the site is not referenced at all in the SA, previous or subsequent versions of the SHLAA or the **Council's 'Site Assessment Proformas'** document or the March 2019 **'Development Options and Technical Site Assessment Report'**.
- 3.24 Bearing in mind the Council has gone to great lengths to assess numerous other sites in detail, we cannot fathom why the land at Stocks Lane, Penketh would not have been assessed in the same level of detail. **We consider this is a shortfall of the Council's evidence base and the plan is not currently justified without full consideration of this site.**

4. VISION AND SPATIAL STRATEGY (PLAN CHAPTER 3)

4.1 Chapter 3 of the plan sets out the vision and objectives for Warrington's future development and details how they will be achieved through the spatial strategy. This chapter also sets out the exceptional circumstances to justify the release of **some of Warrington's Green Belt land to meet** its development needs.

4.2 Paragraph 3.3.7 of the plan states:

*'The existing urban area can accommodate around 13,700 new homes. This means there is still the requirement to provide land for around 7,000 homes through release of Green Belt land. The detailed land requirement calculation is set out in Policy DEV1'.*

4.3 The Council accept that Green Belt release is required **to meet Warrington's own** future development needs and the extent of those needs coupled with the economic and social consequences/impacts of not meeting them in full provide 'exceptional circumstance' **that warrant** Green Belt release within the Borough.

4.4 Taylor Wimpey support the release of land from the Green Belt **to meet the Borough's housing** requirements and to provide a long term strategy for meeting a range of housing needs. Indeed, as the principal settlement within the Borough, Warrington should be the main focus for development as it contains a wide range of existing services and facilities and therefore development within it and around it, can be regarded as being sustainable.

4.5 Taylor Wimpey also support the delivery of new homes in a number of the larger villages to provide choice and a reasonable geographical spread of new homes.

4.6 The only criticisms Taylor Wimpey have in regard to the Local Plan strategy/vision is:

- The suggested extent and reliance of the main urban area of Warrington. At a suggested capacity of 13,726, we consider this to be highly optimistic having carried out a detailed **analysis of the site's being suggested by the Council (see Section 5)**;
- No reserve sites identified within the Local Plan to provide for flexibility; and,
- Very limited safeguarded land provided within the Local Plan (which is all in one location), that could also offer flexibility and longer term options for growth around Warrington.

4.7 With regard to the first point, if it is demonstrated that the Council have been too optimistic in terms of the amount of capacity within the existing urban area, additional sites (including suitable Green Belt sites) will need to be considered.

4.8 With regard to the second point, we simply wish to highlight that there is substantial reliance within the Local Plan on the urban area and a number of key large sites. If any of these sites are not delivered at a rate or scale as currently envisaged, the Local Plan is unlikely to deliver the necessary

housing requirements over the plan period. We therefore suggest, that some additional reserve sites are identified to temper this risk.

- 4.9 With regard to the third point, Taylor Wimpey recognise that the Garden Suburb site will deliver some homes **beyond the plan period and this is the Council's rationale for** not identifying any substantial areas of safeguarded land, and that which has been identified is limited to a small area within the Garden Suburb. We support the need to release the vast majority of the land associated with the Garden Suburb area now to allow for a comprehensive and sustainable suburb with necessary physical and social infrastructure to be masterplanned and brought forward. However, this should not obviate the Council from identifying other suitable locations around Warrington that could be safeguarded for future development. Indeed, there will be a need to provide for some longer term understanding of how Warrington could grow in other locations to ensure a reasonable market spread of homes in the future.
- 4.10 Noting all of the above three points, Taylor Wimpey also put forward land to the west of Penketh as a suitable residential site, which could be identified as either a residential allocation for development now, a reserved site, or safeguarded land subject to how the Council and Local Plan Inspector considers each issue through the Examination process.

5. STRATEGIC PLANNING POLICIES (CHAPTER 4)

5.1 Chapters 4 of the plan includes all the policies for the Borough set against the identified objective for housing and employment growth and we provide comments below specifically in relation to Policy DEV1 – Housing Delivery and Policy DEV4 – Economic Growth and Development.

5.2 **The points below in relation to Policy DEV1 and Dev 4 are replicated in Taylor Wimpey’s separate representations.** That representation report also includes technical appendices supporting the points below. We have not sought to replicate the Appendices within this report but cross reference where necessary.

Policy DEV1 – Housing Delivery

*Housing Requirement*

5.3 The plan identifies that a minimum of 18,900 new homes will be delivered over the 20 year plan period from 2017 to 2037, which equates to 945 homes per annum. We note that the number of homes to be delivered is based on the growth strategy set out in the Cheshire & Warrington Local Enterprise Partnership’s Strategic Economic Plan and reflects the Council’s growth aspirations set out in the Warrington Means Business Regeneration Programme.

5.4 Whilst the 945 homes per annum figure exceeds the minimum local housing requirement (the standard methodology) by 4%, it marks an 18% decrease from the Preferred Development Options which set a housing requirement of 1,113 homes per annum. The latter was based on the jobs growth target set out in the LEP Devolution Deal, which was considered achievable given **Warrington and the wider LEP’s strategic position between the two major City Regions of Manchester and Liverpool.**

5.5 Taylor Wimpey would support any proposals to increase the housing requirement to that set out in the Preferred Development Options version of the Local Plan, and whilst we accept that it might not be strictly necessary to deem the Local Plan sound, our analysis of the available economic evidence (see *Appendix 3* in separate representations made on behalf of Taylor Wimpey) suggests that an additional uplift for employment growth is justified in this instance, in line with the national guidance as set out below.

*National Guidance on Housing Need*

5.6 Paragraph 60 of the 2019 NPPF confirms that local plan submitted after 24th January 2019 should use the Governments Standard Method for calculating housing need unless exceptional circumstances justify an alternative approach.

5.7 However, Paragraph 11 also confirms that for plan-making, the presumption in favour of sustainable development means that:

- Plan should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
- Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...

5.8 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. Many other considerations can impact on the final housing requirement figure set out in a Local Plan and this is evident within several paragraphs of the NPPG, including:

- 2a-002-20190220 - The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement.
- 2a-003-20190220 - The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination (but noting the above that must be an alternative to the minimum).
- 2a-024-20190220 - The total need for affordable housing will need to be converted into **annual flows...An increase in the total housing figure** included in the plan may need to be considered where it could help deliver the required number of affordable homes.

5.9 Under the question '*When might it be appropriate to plan for a higher housing need figure than the standard method indicates?*' the NPPG states the following (para 2a-010-20190220):

*"The standard method...does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*

*This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities*

*will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”*

- 5.10 Paragraph 2a-015-20190220 provides some useful clarification on how this ‘exceptional circumstances’ test will be applied at examination, confirming the logical assumption that exceptional circumstances are only required to justify a figure that’s lower than the standard method:

*“Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.*

*Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. **This will be tested at examination.”***

- 5.11 Whilst Warrington are proposing an approach that exceeds the minimum requirement (by 4%), it is our view that this doesn’t adequately reflect current and future demographic trends, and as such a greater uplift is required, more in line with that proposed in the previous version of the plan and the adopted Core Strategy (1,113 dpa), for the reasons set out below.

#### Employment Trends in Warrington

- 5.12 Our analysis of wider demographic and economic trends in Warrington drew the following conclusions:

- **Warrington’s labour market has performed well over the last 20 years. Even over the period 2009-15, which was badly impacted by the country emerging from the economic downturn, job numbers still grew by an average of almost 1,200 per annum. The Housing Needs Assessment (HNA) questions how realistic it is to extrapolate growth, however the strength of Warrington’s past performance raises the question of whether the 954 jobs p.a. growth used to calculate the housing target of 945 dpa is ambitious enough.**
- Warrington is part of one of the strongest performing areas of the economy – the Cheshire & Warrington LEP. The LEP is currently in the process of developing its Local Industrial Strategy (LIS) and part of the evidence base for the LIS outlines the aim of seeing the area become a £50billion economy by 2040. The LIS evidence base also highlights the strong performance of the LEP since 1998 in terms of growth in economic output. It seems reasonable to assume that this growth will need to continue if the area is to become a £50billion economy, which will require significant levels of employment to be created in the **LPE’s three constituent districts: Cheshire East; Cheshire West & Chester; and Warrington.**

Having a housing target based on future jobs growth which is well below increases seen over the last 20 years therefore seems relatively unambitious.

- In economic terms, it would be sensible to use the annual jobs growth figure of 1,240 outlined in the 2017 SHMA as a starting point for calculating future housing need in Warrington.

5.13 Whilst we acknowledge that a housing target required to meet a jobs growth target of above could be compounded by wider market and deliverability issues in Warrington (noting that they are far greater than levels of delivery previously achieved in the Borough), this does indicate that the proposed figure of 945 dwellings per annum is likely to fall short of any economic led projections and associated housing requirement.

5.14 In light of the above point and previous plans suggesting a higher rate would be achievable, the proposed housing requirement should either be increased, or at the very least viewed as a minimum, with flexibility built in to allow higher levels of sustainable growth as required.

#### *Housing Distribution*

5.15 It is necessary to include 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.

5.16 The plan says at paragraph 4.1.10 that the Council has used a benchmark of 10% which it considers **provides sufficient flexibility in the context of the plan's proposed housing land supply and Taylor Wimpey fully support this 10% flexibility factor.** This brings the total housing requirement to 20,790 homes as set out in Table 1 of the plan.

5.17 The plan sets out how the housing requirement is to be achieved during the plan period though:

- A minimum of 13,726 homes from the main urban area of Warrington;
- A minimum of 5,832 homes from two large urban extensions; and,
- A minimum of 1,085 homes from allocated sites at settlements which lie outside the main urban area.

5.18 The first things we would like to point out is that the Council have identified land for 20,646 homes which incorporates a flexibility of 9% and not 10% as claimed.

5.19 That said, Taylor Wimpey fully support the principle of maximising development in existing urban areas, as a means of promoting sustainable growth. The spatial distribution of housing should follow a logical hierarchy which provides an appropriate pattern of development and supports sustainable development. However, there are serious concerns about the heavy reliance on the main urban area to achieve 67% of the housing requirement. We address this in greater detail below.

5.20 Furthermore, the housing distribution set out above results in their being a lack of housing development land on the periphery of the main urban area, especially for medium-sized development to the west of the Borough.

Main Urban Area of Warrington

5.21 The 13,726 homes are explained in the 2019 Urban Capacity Assessment, where it is broken down as:

- 9,226 homes identified through the SHLAA including small sites allowance (2018 to 2033);
- 210 homes identified through the SHLAA at Peel Hall (2033 to 2037);
- 304 homes from small site allowance (2033 to 2037);
- 6,549 homes from town centre and waterfront masterplanning work;
- 359 homes from completions during 2017/2018; and
- -2,919 to avoid double counting between the SHLAA and town centre masterplanning work.

5.22 For the reasons set out below, we raise serious questions over the timescales and deliverability of all of the 13,726 homes in the main urban area during the plan period.

5.23 We do this with reference to the latest deliverability guidance set out within the glossary of the 2019 NPPF:

*"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*

- *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.*

*Developable: To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged".*

*SHLAA Sites and Small Sites Allowance (2018 to 2033)*

5.24 The 9,226 homes identified through the SHLAA including small sites allowance (2018 to 2033) is explained in the SHLAA, where it is broken down as follows:

- 8,086 homes from large sites; and
- 1,140 homes from small sites (76 dpa).

5.25 The SHLAA goes on to break down the 8,086 supply as follows:

- 3,568 homes from large sites with planning permission
- 4,518 homes from large sites without planning permission

5.26 Firstly, it should be noted that 1,398 homes of the 8,086 homes identified from large sites (or 17%) is on land which is not being promoted by the landowner, casting doubt on whether they wish to develop their land and therefore on the deliverability of this element of the capacity.

5.27 Secondly, there is the element of risk with the deliverability of the large sites without planning permission. To temper the risk associated with this element of the supply we have applied a 25% reduction to sites within this category, which reduces this element of the supply to 3,388 (i.e. 1,130 less than claimed).

#### *Small Site Allowance (2033 to 2037)*

5.28 Whilst the 2019 NPPF acknowledges that small sites can be a realistic source of supply, paragraph 70 requires evidence not only of past delivery rates, but that such rates can continue going forward, taking account of expected future trends.

5.29 In this instance, it is considered that a flat rate across the plan period and including the last five years of the plan period, is extremely optimistic as sources of small sites are finite, and therefore the rate of windfall should naturally fall over time as more sites are picked up through the SHLAA / 'call for sites' process, or allocated for development. Furthermore, small sites are naturally and generally within the urban area which is accounted for separately in the comprehensive masterplanning exercise, which we discuss below.

5.30 In addition, with Council's **now required to produce brownfield register's each year listing all** available brownfield land coupled with more permissive planning powers such as permission in principle, it is likely that such sites will be exhausted in the next 15 years.

5.31 We seriously question whether there will be any significant windfall after 2033, given the level of planned regeneration in the first 15 years of the plan period and as such we have removed this element from the supply (i.e. 304 less homes).

#### *Town Centre and Waterfront Masterplanning*

- 5.32 The main issue we have with the overall urban capacity is the ability of the town centre and waterfront to deliver 6,549 homes. The 6,549 homes **are explained in the Council's Trajectory**, where it is broken down as:
- 4,007 homes identified in the town centre; and,
  - 2,542 homes identified at the waterfront.
- 5.33 **This capacity is split into numerous parcels of land which are depicted on the Council's various masterplans (Land Use Plan, Character Areas Plan and Phasing Plan).** However, there is no delivery mechanism within the plan to bring forward these homes, many of which are proposed on parcels of land that are in active use and have multiple landowners.
- 5.34 We have reviewed each of the town centre and waterfront parcels in detail and provide a Capacity Assessment of the associated masterplans (see *Appendix 4* in separate representation submitted on behalf of Taylor Wimpey). In headline terms our assessment identifies that:
- A large proportion of the parcels (54 of 104, or 52%) have more than one land title with some having 20 or more titles suggesting there will be land assembly issues, unless the Council is proposing some sort of large scale CPO, which has not been suggested.
  - Only 2,652 of the 6,549 unit capacity (or 40%) is on sites that have been put forward for development in the SHLAA, meaning that 60% has been generated from the masterplanning exercise with little supporting evidence.
  - A total of 4,540 of the 6,549 unit capacity (or 69%) is proposed on sites with at least one active occupier and these include national supermarket operators like Asda and Lidl, with no indication that these are intending to close or relocate or that their leases are due to expire.
  - The masterplanned capacity of the high density dwellings is based on 140 dph, whereas both Policy TC1 of the plan and the SHLAA refer to a high density dwelling capacity of 130 dph, effectively over-inflating the capacity of the high density dwellings within the masterplanned capacity.
- 5.35 Whilst a claimed capacity of 6,549 homes is identified within the town centre and waterfront, our assessment identifies the developable and deliverable capacity of 4,187 homes (1,765 homes within the town centre and 2,422 homes at the waterfront) (i.e. 2,360 less than claimed). This includes the SHLAA sites, vacant (or largely vacant) sites and those with planning permission.
- 5.36 Within our assessment we have calculated the likely delivery of the homes from within the town centre and waterfront by applying a development risk ratio, an approach endorsed by the Knowsley Local Plan Inspector (see separate representation by Taylor Wimpey), whereby an element of risk was factored into the expected delivery of the urban capacity depending on whether sites had planning permission and the viability of those sites without permission. We have applied similar

principles and calculated the risk of delivery depending on whether parcels have planning permission for residential development, whether they have been included within the SHLAA and put forward by the landowner, whether the parcels are in multiple ownerships and therefore requiring land assembly and whether they are in active and viable commercial use.

- 5.37 Urban capacity aside, the remainder of the housing requirement is to be achieved through urban extensions and allocated sites. We consider these below.

### Urban Extensions

- 5.38 The plan proposes two urban extensions, at Garden Suburb and South West Extension. Taylor Wimpey support the identification of the Garden Suburb proposal in particular and agree that the housing (and employment) requirement is an exceptional circumstance which justifies its removal from the Green Belt.
- 5.39 The capacity of these urban extensions is set out in the plan as follows:
- Garden Suburb – a minimum of 5,131 homes to be delivered in the plan period (including 930 homes which already have consent); and,
  - South West Extension – minimum capacity of 1,631 homes to be delivered in full in the plan period.
- 5.40 The only point we would like to make about the capacity at the Garden Suburb is that 5,131 homes are identified in the plan period in Policy DEV1, whereas Policy MD2 – Warrington Garden Suburb **refers to “around 5,100 homes” within the plan period. For consistency it would be preferable if both Policy DEV1 and Policy MD2 referred to the same figure.**
- 5.41 Regarding the delivery of the homes within the South West Extension it is noted that this is intrinsically linked to the delivery of the Warrington Western Link which is a significant piece of infrastructure. We therefore question whether homes could be delivered here from 2023/24 and whether the urban extension could be completed at the end of the plan period. It is not an unrealistic proposition that the delivery may slip by a few years meaning that the site would fail to deliver in full within the plan period. As such, we consider that the South West Extension would begin to delivery 2025/26 resulting in 116 homes being provided beyond the plan period.

### Allocated Sites

- 5.42 In general terms, Taylor Wimpey support the release of land from the Green Belt release around the settlements of Burtonwood, Croft, Culcheth, Hollins Green, Lymm and Winwick which will collectively provide around 1,085 homes on medium-sized sites ranging between 40 and 200 homes in order to provide a wider choice of homes across the Borough in a range of locations.

### Summary and Conclusions to Housing Distribution

- 5.43 To understand the **implications of the comments we have provided above we compare the Council’s** housing requirement to the supply identified in our assessment in Figure 4.1.

**Figure 4.1 – Housing Supply during Plan Period**

	<b>Council Supply Position</b>	<b>Pegasus Supply Position</b>	<b>Difference</b>
<b>Urban Capacity</b>			
SHLAA including Small Sites	9,226	8,139	-1,130
SHLAA Peel Hall	210	210	-
Small Site Allowance 2033-2037	304	0	-304
Town Centre and Waterfront Masterplanning	6,549	4,187	-2,360
Completions	359	359	-
Double Counting	-2,919	-2,919	-
<b>Urban Extensions</b>			
Garden Suburb	4,201	4,201	-
South West Extension	1,631	1,515	-116
<b>Allocated Sites</b>			
Allocated Sites	1,085	1,085	-
<b>Housing Supply Total</b>	<b>20,646</b>	<b>16,774</b>	<b>-3,872</b>
<b>Shortfall at 9% flexibility (i.e. 20,646 home requirement)</b>			
	-	-3,872	
<b>Shortfall at 10% flexibility (i.e. 20,749 home requirement)</b>			
	-144	-3,975	

- 5.44 In summary, when accounting for the need to incorporate an element of flexibility which we believe should no less than 10% to allow higher levels of sustainable growth as required, there is a **shortfall of land for 3,975 homes** to meet the minimum housing requirement set out Policy DEV1.
- 5.45 Furthermore, and as we have set out above, the proposed housing requirement should be increased, or at the very least viewed as a minimum.
- 5.46 As such, there is a requirement to identify additional capacity for housing land within the Borough. Some of this capacity could be made up within and adjacent to the Garden Suburb and the identification of additional land.

**Housing Trajectory**

- 5.47 The plan sets out the stepped housing trajectory of 847 homes per annum between 2017 to 2021 and 978 homes per annum between 2022 to 2037. We do not consider this stepped approach to be appropriate as it appears that it is being used by the Council as a way of achieving a five-year land supply position on adoption. These housing numbers represent the actual housing needs today and therefore it is unreasonable to expect people to wait until later in the plan period before their housing needs are addressed.
- 5.48 Whilst it is recognised that the stepped housing trajectory is linked to the anticipated lead in times of the urban extensions, this could be addressed through the allocation of medium-sized sites on the fringe of the main urban area.

### **Supply Beyond the Plan Period**

- 5.49 The plan in its current form does not include any significant areas of safeguarded land. Whilst the NPPF does not appear to provide any definitive guidance to indicate the amount of land which should be safeguarded, the NPPF is clear that where necessary, Local Plans should provide safeguarded land to meet longer term development needs stretching 'well beyond the plan period'. Local authorities should satisfy themselves that Green Belt boundaries 'will not need to be altered at the end of the development plan period'.
- 5.50 In addition, the plan should provide triggers which would indicate when the safeguarded land would be considered for release, through a plan review. The release of safeguarded land could be linked to a trigger if the plan is failing to deliver.

### **Housing Delivery Test**

- 5.51 The first round of Housing Delivery Test (HDT) results were issued in February 2019, which applies a standardised approach to housing delivery over the preceding 3-year period for all the Local Authorities across the country (in line with the HDT Measurement Rulebook and paragraphs 73-75 of the NPPF).
- 5.52 The resultant percentage figure is used to confirm which buffer should be applied in the five-year supply calculation (5% if delivery is above 85% and 20% if below). In addition, if delivery has dropped below 95% the Council are required to prepare an Action Plan to assess the causes of under-delivery and identify actions to increase delivery in future years. Finally, if delivery is below 25% (in the current 2018 results but increasing to 45% in 2019 and 75% in November 2020 under transitional arrangements), then the tilted balance in relation to the presumption in favour of sustainable development is engaged.
- 5.53 In the case of Warrington this suggests a figure of 55% meaning that the 20% buffer is applicable, and an action plan is not required.

**Figure 4.2 – Housing Delivery Test**

	2019 HDT completions	2019 HDT requirement	Delivery against HDT requirement
2015/2016	595	923	-328
2016/2017	492	902	-410
2017/2018	359	792	-433
TOTAL	1,446	2,617	-1,171
Average dpa/ HDT %	482	872	55%

- 5.54 As can be seen from the table, Warrington delivered 1,446 new homes over the last three years against a 'requirement' of 2,617 dwellings.

### 5 Year Housing Supply

- 5.55 The Council do not confirm their 5YHLS position within the plan, although the 2018 SHLAA and AMR do confirm the supply and requirement position at 1<sup>st</sup> April 2018, which allows an accurate calculation to be made
- 5.56 Accordingly, we set out our analysis of the Council’s 5YHLS position below, using various different scenarios for both the requirement and supply side inputs to give a range of figures.

**Figure 4.3 – Five Year Housing Land Supply**

	2017 Start Date		2014 Start Date (Historic Shortfall)	
	Stepped Target	Full Req't	Stepped target	Full Req't
Annual Requirement	847	945	847	945
5 Year Requirement	4,235	4,725	4,235	4,725
Shortfall (against target and over relevant period)	488	586	1,210	1,308
5 year requirement + shortfall	4,723	5,311	5,445	6,033
5 Year Requirement + shortfall + 20% buffer	5,668	6,373	6,534	7,240
Total Supply (including windfall)	3,555			
Total Supply (without w'fall = standard 10% lapse)	3,175			
5 Year Supply Figure with windfall	3.14	2.79	2.72	2.46
5 Year Supply Figure without windfall	2.80	2.49	2.43	2.19

- 5.57 We conclude that the Council’s supply is between **2.2 and 3.1 years** depending on whether:
- The full 945 dpa or stepped 847 dpa requirement is used;
  - The shortfall is considered over since the start of the plan period (2017), or since the beginning of the SHMA period (2014);
  - Windfall is included in the supply. In this case the windfall amount is close to 10%, which is a standard lapse rate applied to supply figures and as such forms a useful sensitivity test.
- 5.58 This combination of historic under-delivery and the 5YHLS shortfall (which it accentuates) provides further support for releasing additional sites now, on top of the Green Belt sites already proposed for allocation, to aid delivery in the first five years of the plan.

### Policy DEV4 – Economic Growth and Development

- 5.59 Taylor Wimpey fully support the Council identifying a level of employment land to meet both local and wider strategic needs, based on the aspirations of Northern Powerhouse, the Warrington Means Business regeneration programme, and the Cheshire and Warrington LEP SEP. This demonstrates

an ambitious and positively prepared plan in this regard, with the potential for Warrington to attract economic investment and jobs from the wider region.

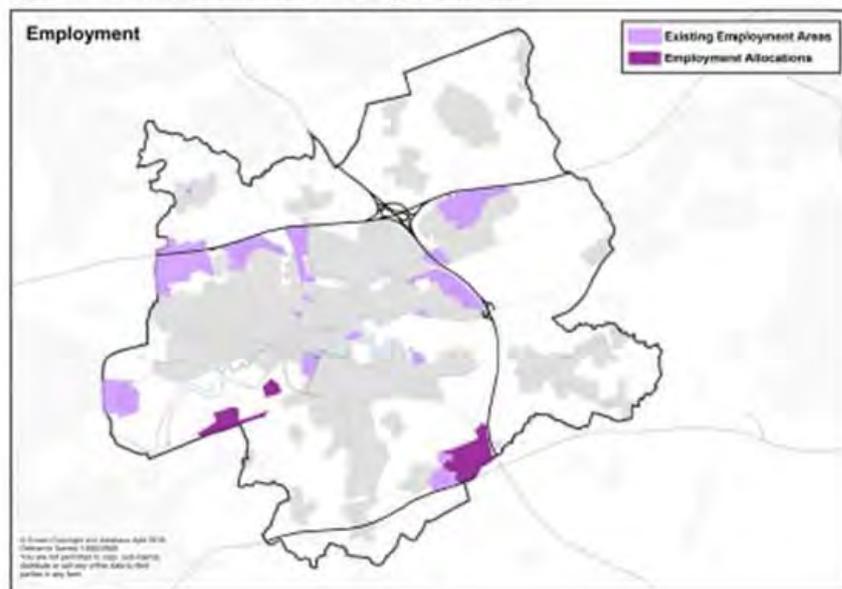
- 5.60 Clearly, this level of employment growth will need to be supported by housing growth, to provide both the quantity of housing accommodate the additional workers and the and choice of housing to attract the right range of professionals.
- 5.61 Employment land requirements are calculated at 362ha over the period 2017-37. This figure is derived from the 2019 Economic Development Needs Assessment (EDNA), undertaken by BE Group and Mickledore. The EDNA concludes that the preferred forecasting method for establishing employment land need is a projection forward of past take-up rates that considers both strategic and local needs. The EDNA also identifies future employment land need by combining forecasts produced by Oxford Economics (the baseline position) with job creation associated with the Strategic Economic Plan of the Cheshire & Warrington Local Enterprise Partnership (the policy-on position). This method results in employment growing by 954 jobs per annum in Warrington between 2017 and 2037, however paragraph 2.44 of the EDNA concludes that this employment figure translates into land requirements that significantly underestimate future employment land need.
- 5.62 The point made by the EDNA in relation to which method to use is interesting because the 2019 Local Housing Needs Assessment undertaken by GL Hearn, which identifies a dwelling requirement of 945 per annum, uses the 954 jobs per annum figure as the starting point for estimating future housing need in the District – i.e. the same jobs estimate calculated by combining the baseline Oxford Economics forecasts with the policy-on impact of the SEP. It is not possible to calculate how many jobs could be created by developing 362ha of employment land identified by the EDNA, however it seems reasonable to assume that it would generate more than 954 jobs on an annual basis up to 2037. It would therefore be sensible if further analysis was undertaken to establish the level of employment likely to be generated by the 362ha of employment land. If it emerges that annual jobs growth surpasses 954 per annum, this will have knock-on effects for housing need in Warrington.
- 5.63 Put simply, it is imperative that these economic and housing aspirations are aligned, where our economic analysis suggest this might not be the case, with the level of housing currently proposed unlikely to fully support and realise the economic ambitions of the plan<sup>1</sup>.
- 5.64 We support the flexibility built into Part 9 to allow unviable employment land to come forward for other uses, where appropriate, and suggest this should be stated to include residential development.

---

<sup>1</sup> Please refer to separate representations made to the plan

- 5.65 Figure 4 at page 52 of the plan shows the distribution of existing and proposed employment sites within the borough and demonstrates an even geographic spread, with obvious clusters around the motorway junctions, which we support.
- 5.66 However, as noted in above, the distribution of housing sites does not reflect this focussing on the town centre and two strategic allocations to the south. In our view the Council should consider additional allocations to west of borough, which is well connected to the employment opportunities at Lingley Mere Business Park, Omega Business Park and other locations along the M6 corridor.

**Figure 4 – Existing and Proposed Employment Sites**



## 7. SUMMARY AND CONCLUSIONS

7.1 Overall, we support the exceptional circumstances cited by the Council to support Green Belt release for housing and employment development. However, enough land has not been released from the Green Belt to meet the housing requirement.

7.2 This is based on our objection to:

- The suggested extent and reliance on urban land being delivered within the existing developed core of Warrington town centre;
- The lack of reserve sites identified within the Local Plan to provide for flexibility;
- Very limited safeguarded land provided within the Local Plan, that could also offer flexibility and longer term options for growth around Warrington; and,
- The lack of housing development land to the west of the main urban area owing to the reliance on the urban core and the very few large strategic sites.

7.3 We conclude that the Stocks Lane site does not fulfil the five purposes for including land in the Green Belt. This conclusion is consistent with historic assessments of the site and which resulted in it being identified in a pre-RSS draft plan as safeguarded land.

7.4 This, combined with the fact that it is a sustainable and deliverable site, as demonstrated above and in the Development Statement it is recommended that it be released from the Green Belt and allocated for development now through the Local Plan process to help meet future housing needs.

APPENDIX 1 – ILLUSTRATIVE MASTERPLAN

## APPENDIX 2 – DEVELOPMENT STATEMENT

APPENDIX 3 – LANDSCAPE NOTE



**RANDALL THORP**

LANDSCAPE ARCHITECTURE  
ENVIRONMENTAL PLANNING  
MASTERPLANNING  
URBAN DESIGN

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**KEY:**

- |                                                                                     |                              |                                                                                     |                                               |
|-------------------------------------------------------------------------------------|------------------------------|-------------------------------------------------------------------------------------|-----------------------------------------------|
|  | Site boundary                |  | Proposed footpaths                            |
|  | Existing buildings           |  | Pedestrian route and emergency vehicle access |
|  | Existing vegetation          |  | Proposed primary road                         |
|  | Proposed vegetation          |  | Proposed secondary road                       |
|  | Proposed greenspace          |  | Proposed private drive                        |
|  | Existing waterbodies         |  | Development parcels                           |
|  | Proposed waterbodies/wetland |  | Proposed mews courtyard                       |

**Taylor Wimpey**

**Stocks Lane,  
Penketh**

Illustrative Masterplan

**Taylor  
Wimpey**

# **Stocks Lane Penketh**

**Development Statement**

June 2019





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### Masterplan in Site Context



# Executive Summary

This Development Statement has been prepared on behalf of Taylor Wimpey UK Limited (“Taylor Wimpey”) to support the release of the land west of Stocks Lane, Penketh (“the site”) to deliver up to 600 new family and affordable homes during the next plan period. The site extends to 30.1 hectares and is located to the west of the Warrington suburb of Penketh, bounded by Farnworth Road to the south and the Warrington to Liverpool railway line to the north.

The case for allocating this site for housing development within Warrington’s Local Plan Review is clearly presented within this Development Statement, including the exceptional circumstances that support the need to amend the Borough’s Green Belt. The allocation of this site for residential development will deliver open market and affordable housing of a type, quantity and quality that will make a significant contribution to the future growth needs of Warrington.

## Key Facts

Site Name	<b>Stocks Lane, Penketh</b>
Local Authority	<b>Warrington</b>
Site Area	<b>30.1 Ha</b>
Proposed Dwellings	<b>Up to 600</b>

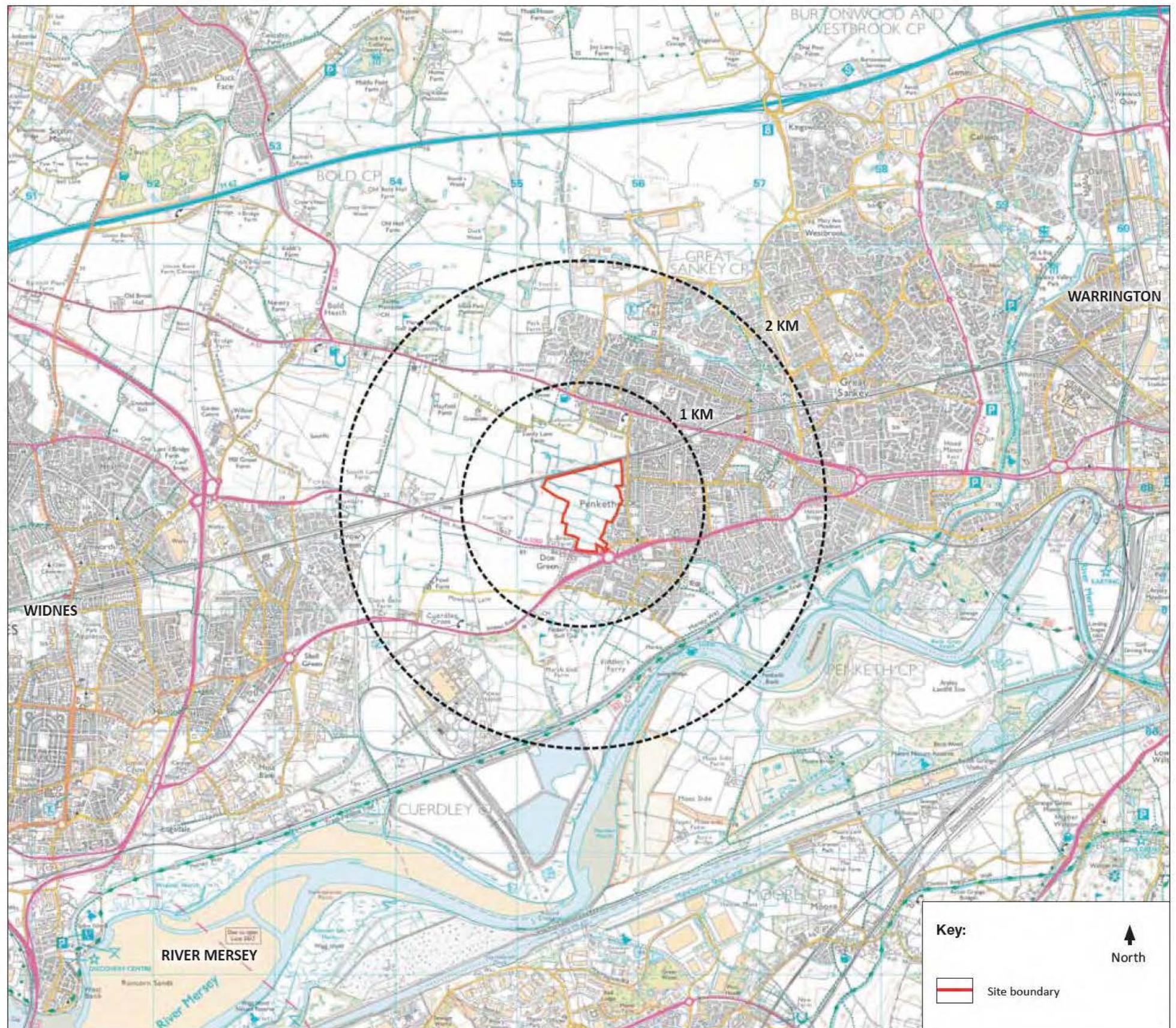




# 1.0 Introduction



Figure 1: Site Context Plan



# 1.0 Introduction

## Vision

The Stocks Lane site presents an excellent opportunity to release 30.1 hectares of land to deliver a high quality sustainable housing site that will sensitively meet the future housing needs of the Borough. The vision for the site is to develop a landscape led masterplan that complements the surrounding site context, and creates a high quality family and affordable community to meet the needs of the Borough, whilst providing a stronger and more defensible Green Belt boundary to the west of Warrington.

To support the vision, this Development Statement clearly articulates the opportunity presented by the site. In summary, it demonstrates that:

- There are exceptional circumstances that support an alteration to the Green Belt in the Borough; including the absence of a 5-year supply of housing land, a lack of affordable homes and insufficient urban land to meet the housing need during the Plan Period.
- There is a compelling case to remove the site from the Green Belt, when tested against the National Planning Policy Framework (“NPPF”). The site represents a logical extension to west of Penketh which works within existing physical boundaries.
- The site has access to a range of services and facilities at the Warrington Road Local Centre, 1km to the east of the site, with further services located at Honiton Way Neighbourhood Centre, 1.5km to the north east of the site.
- There are no identified technical or environmental constraints that would prevent the site coming forward for development.
- The site is deliverable, achievable and available for housing development in accordance with guidance contained in the NPPF. A vision and masterplan for the site illustrates how the site can deliver a sympathetic, sustainable development that complements its setting.
- A sensitive design-led masterplan for the site will complement, respond to and integrate key landscape features adjacent to the site.
- The site will deliver a landscape and open space solution that relates to the existing urban grain and responds to the key natural features and topography of the site, whilst also providing a parkland setting with circular walking routes for use by future residents and the wider public.
- The proposals will create a range and mix of housing types that will make a positive contribution towards the Borough’s housing requirements; providing both open market and affordable housing, and generate significant social and economic benefits for the local area.





## The Case for Green Belt Release

The site no longer fulfils its purpose as Green Belt land as established at paragraph 134 of the 2019 NPPF and, as such, there is a compelling case for its release. Its allocation for future development would:

1. **Not result in unrestricted sprawl of large built-up areas.** The Warrington to Liverpool railway line and Farnworth Road form strong physical boundaries which restrict sprawl to the north and south. Whilst the site is open to the west, existing development at Doe Green to the south and Lingley Green to the north already extend out westwards making this a logical extension to Penketh, infilling and rounding off at the edge of the urban area.
2. **Not cause the merger of neighbouring towns.** The development of the site would not close the gap between Penketh and Widnes as the closest point between the two is already established by development at Doe Green to the south, and this gap would be maintained by the proposed development.
3. **Not create unacceptable encroachment into the countryside.** The railway line and the main road provide strong boundaries preventing encroachment north and south, and also ensure that the site is not a particularly tranquil location or one with intrinsic beauty. As such, the site currently serves little function within its countryside setting and its loss would not be unacceptable.
4. **Not impact on the special character of historic towns.** The site is over 4km from the Warrington Town Centre Conservation Areas, and the site does not cross an important viewpoint of the Parish Church. The site is also over 4km from the Conservation Area in Widnes. There is a Grade II listed Farm (Brookside Farm) at the south west corner of the site, however, this is heavily screened by trees, and is already flanked by existing residential development, which ensures that development of the site will have minimal impact on its setting.
5. **Not discourage urban regeneration.** As noted, the Council fully accept that there is insufficient land within Warrington's existing urban and greenfield sites to meet its own needs for housing and employment land going forward.

There are also exceptional circumstances which support an alteration to the Green Belt. These include:

- The lack of a sufficient housing supply to support the development needs of the Warrington Borough.
- An acute need for affordable housing and sites that have the capacity and viability to deliver new affordable homes.
- The delivery of development of up to 600 high quality new homes that will deliver significant social and economic benefits accordance with the provisions of the NPPF.
- The site is well located in terms of access to employment opportunities and local services and facilities.

Furthermore, the site has been previously identified for potential safeguarding and release from the Green Belt, within a wider area of search within the Warrington Borough Draft Plan from 1993; suggesting that the Council have considered this location suitable for longer term development.

### Summary

**The development of the site at Stocks Lane, Warrington provides a highly sustainable opportunity to support the national growth agenda and to assist in providing adequate land to deliver a new Local Plan for the Borough. The site will deliver the quantity, type and quality of homes that is required across the Borough and can demonstrate exceptional circumstances that support an alteration to the existing Green Belt without impacting on its core functions. Taylor Wimpey is committed to working collaboratively with the Council and Key Stakeholders to ensure that the Borough's housing need is met in a sensitive and sustainable manner.**



# 2.0 Site & Surroundings



Figure 2: Aerial Photograph Showing Site Context



## 2.0 Site and Surroundings

**The site falls to the west of Penketh, which is a suburb to the west of Warrington. The site is outside the existing urban boundary, but sits alongside an existing residential area and forms a natural and logical extension to Penketh.**

### The Site

The site comprises 30.1 hectares of agricultural pasture land, with equestrian uses on the south east section, and is largely flat in terms of topography. It is broadly rectangular in shape, widening as it extends northwards along the boundary with the Warrington to Liverpool railway line. The site abuts the urban boundary of the settlement of Penketh.

Penketh Brook runs through the southern part of the site, with the surrounding land (approximately 3 hectares) falling within Flood Zone 3. There are hedgerows and tree planting along the field boundaries, which form robust boundaries around the site and landscape features within the site. There is a denser area of trees just north of Penketh Brook.

The site is in a sustainable location on western edge of Penketh, approximately 1km east of the Local Centre on Warrington Road which provides local shops and facilities. The larger Honiton Way Neighbourhood Centre is 1.5km away and the site is located within 600m of the nearest primary school. There are also bus stops on the southern boundary of the site offering regular services to Warrington town centre, Huyton and Liverpool.

A greater range of shops and facilities can be found in the nearby Town Centre of Warrington which is 5.5 km to the east.

### Site Surroundings

The site is bounded by the urban area of Penketh to the east with the rear of residential properties fronting Stocks Lane. Brookside Farm lies in the south-east corner.

The north of the site is bound by the Warrington to Liverpool Railway line. Along this boundary there are sporadic trees and hedgerows. The A5080, Farnworth Road, runs along the southern boundary of the site, which is lined by residential properties and farm buildings. Open agricultural fields lie to the west, along with a methane extraction facility, approximately 150m west of the northern corner of the site.

The urban area is characterised by a mix of semi-detached and detached properties, including some single storey dwellings.

To the east of the site, Farnworth Road links with a large 5-arm roundabout providing access to the A562 and minor local access roads.

There are a wide range of employment sources of local and regional importance within close proximity of the site, including Omega and Lingley Mere, Inner Warrington and the Town Centre, the Waterfront and Arpley Meadows and Port Warrington. The site will interact effectively with these employment locations both in terms of supporting the labour supply and acting as a customer base for local business.

Figure 3: Site Context Plan and Photos



Photo A - View from within the site looking north towards the elevated railway line



Photo B - View from the centre of the site looking north across the site



Photo C - View from within the site looking south east towards housing on Haslemere Drive which backs onto the site



Photo D - View from within the site looking south towards Farnworth Rd

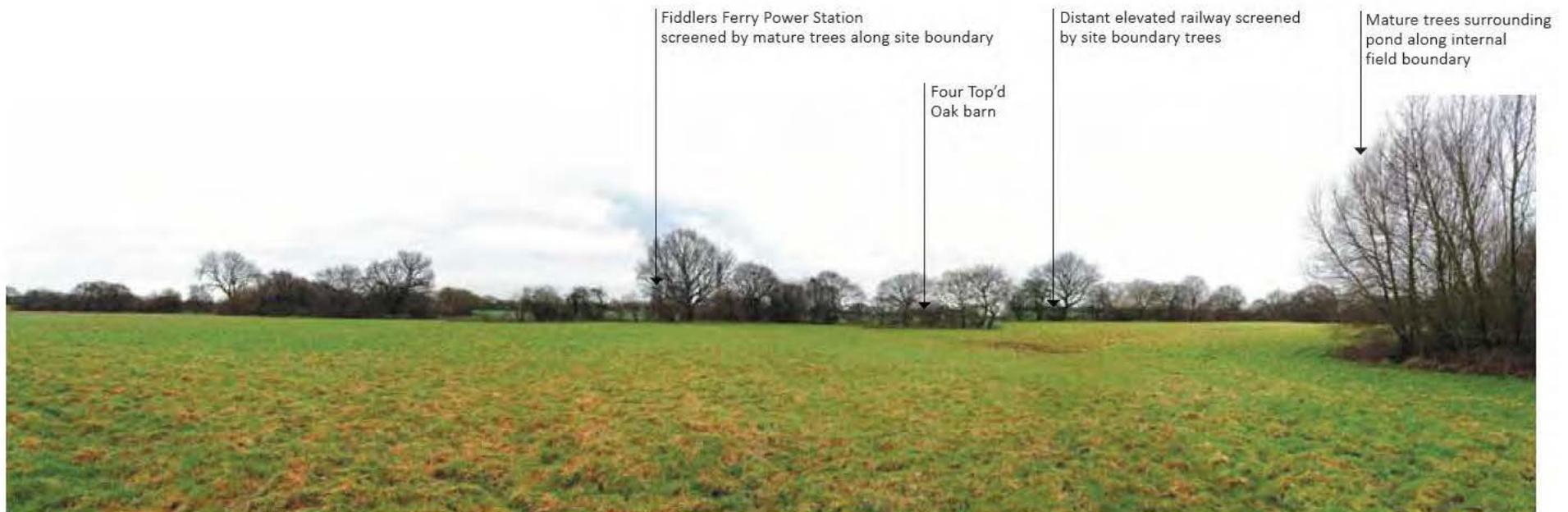


Photo E - View from within the site looking south west towards Widnes



Photo F - View from within the site looking north west towards the north west boundary



Photo G - View from Farnworth Rd looking north across the site



# **3.0**

## **The Need for Development in the Green Belt**



## 3.0 The Need for Development in the Green Belt

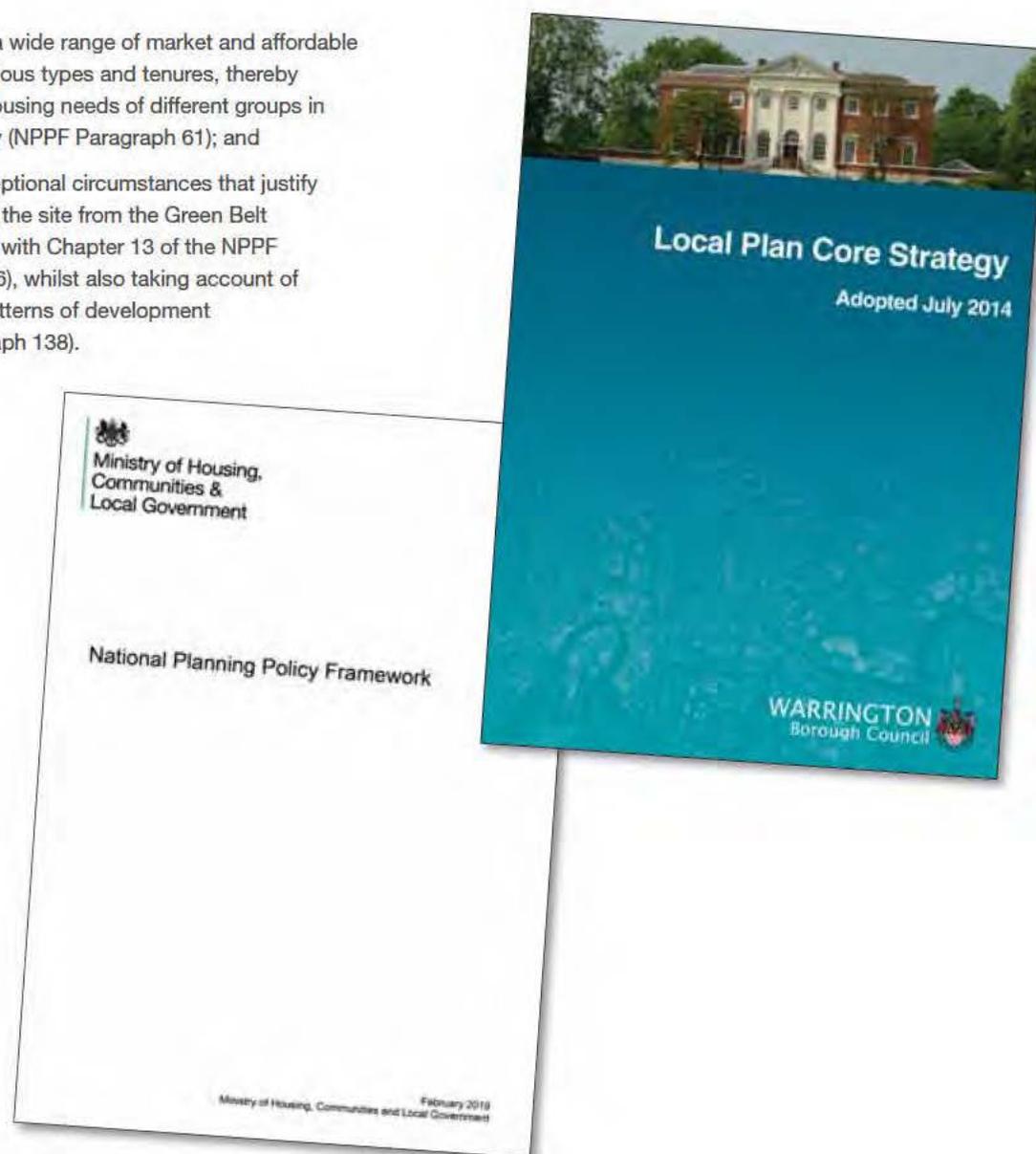
**There is a compelling case for removing land west of Stocks Lane, Penketh from Warrington's Green Belt. The need to release the site from the Green Belt is justified by the emerging planning policy and housing supply position, exceptional circumstances that support alterations to the Green Belt and the fact that the site fails to adequately fulfil the Green Belt functions.**

### National Planning Policy

The Revised National Planning Policy Framework (NPPF), published in February 2019, outlines the Government's core objectives for the planning system, which include the need for local authorities to boost their supply of housing. Releasing the Stocks Lane, Penketh site from the Green Belt to facilitate new housing development would be consistent with the core objectives of the NPPF because:

- It would meet the three pillars of sustainable development by delivering economic, social and environmental benefits (NPPF paragraph 8);
- It would be entirely consistent with the presumption in favour of sustainable development- which is at the very heart of the Planning Framework (NPPF paragraph 10);
- It would offer a sustainable location, in Penketh, which is accessible to a range of sustainable transport modes, and a range of services and facilities (NPPF Paragraph 108). It is also a Green Belt site which is well-served by public transport, which is a new consideration in the 2019 NPPF (NPPF Paragraph 138);
- It would significantly boost the supply of housing and provide a deliverable site that is available, suitably located, achievable and viable (NPPF Paragraphs 59 and 67);

- It will provide a wide range of market and affordable housing of various types and tenures, thereby meeting the housing needs of different groups in the community (NPPF Paragraph 61); and
- There are exceptional circumstances that justify the removal of the site from the Green Belt in accordance with Chapter 13 of the NPPF (Paragraph 136), whilst also taking account of sustainable patterns of development (NPPF Paragraph 138).



## Local Planning Context

### Warrington Local Core Strategy

The Development Plan comprises the Warrington Local Plan Core Strategy, which was adopted in July 2014, and covers the plan period 2006 to 2027. Core Strategy Policy SN1 set a housing requirement of 10,500 across the period, which equates to an annualised average of 500 per annum, with the majority of this development was to be focused around Inner Warrington, Waterfront and Arpley Meadows. Policy CS2 also set a requirement of 1,100 new homes to be delivered at the Omega Strategic Proposal. However, these elements of the housing requirement were challenged in the High Court in February 2015, which led to them being quashed.

Policy SN2 set an affordable requirement of 30% on greenfield sites of 15 units or more.

### Emerging Local Plan

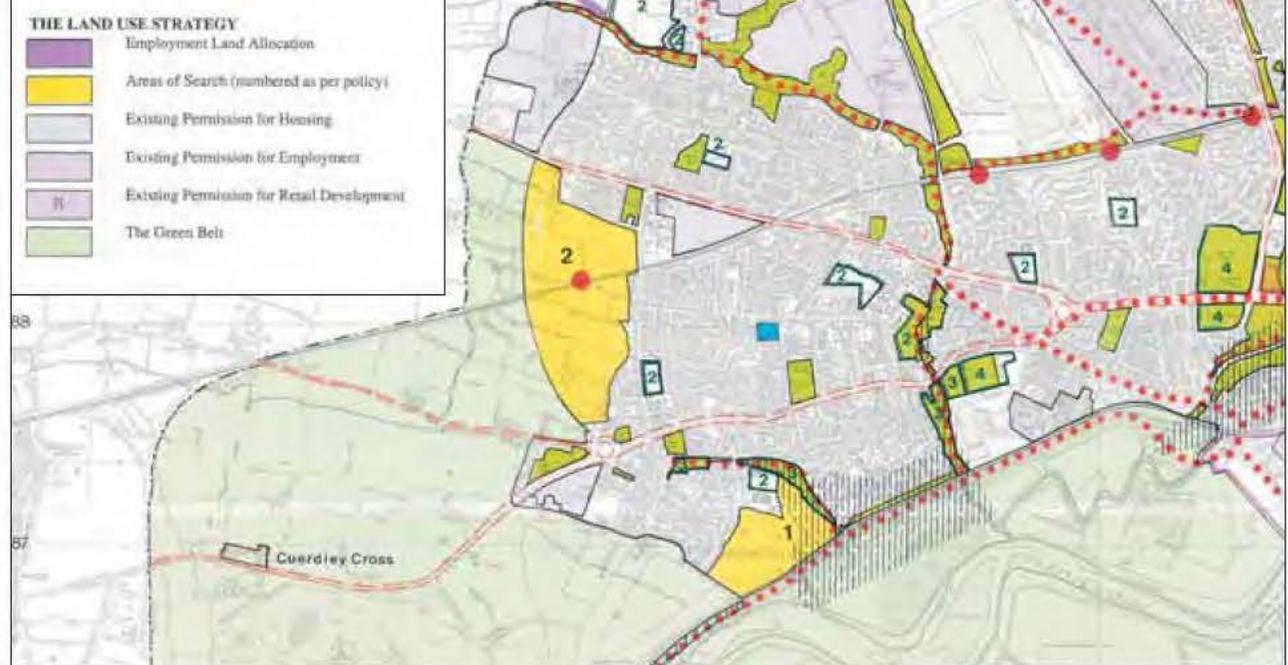
Warrington Council published the Submission Version of their emerging Local Plan in April 2019, which will establish the new housing and employment land requirements of the Borough from 2017-2037. It also provides guidance on the location and distribution of new development over the plan period.

Draft Policy DEV1 (Housing Delivery) outlines a minimum housing requirement of 18,900 new dwellings over the 2017 to 2037 plan period which equates to an annualised requirement of 945 dwellings per annum. The majority of new homes will be delivered within the existing main urban area of Warrington, the existing inset settlements and other sites identified in the SHLAA.

Two sustainable urban extensions to the main urban area of Warrington are proposed; the Garden Suburb (which will deliver a minimum of 6,490 homes, 4,201 of which will be delivered in the plan period) and the South West Extension (which will deliver a minimum capacity of 1,631 homes within the plan period). A minimum of 1,085 homes are planned to be delivered on Green Belt sites in the following outlying settlements; Burtonwood, Croft, Culcheth, Hollins Green, Lymm and Winwick.

The Stocks Lane site is not allocated for development within the Local Plan, however we outline the compelling reasons why it should be throughout this Development Statement.

**Figure 4: 1994 Draft Local Plan extract**



### Warrington Borough Council Draft Local Plan 1994

It should be noted that the site was previously identified within a larger area of search for potential safeguarding/release from the Green Belt in the Warrington Borough Draft Plan from 1994. This designation suggests that this area has previously been considered suitable for longer term development.

Given this previous designation, this site should be considered as a site for future residential development.

### Housing Supply

The most recent housing supply figures come from the 2018 Annual Monitoring Report (covering the period 1st April 2017- 31st March 2018) and the 2018 Strategic Housing Land Availability Assessment (with a base date of 1st April 2018). These documents confirm that Warrington are unable to demonstrate a 5-year deliverable supply of housing going forward, with a supply of 3,555 dwellings over the period 2018-2023, equating to 711 dwellings per year, which is significantly lower than the 945 dwellings per annum requirement set out in the Submission Version of the Local Plan (by 25%). It is acknowledged that the Council are proposing a stepped approach to housing delivery with a reduced target of 847 dpa in the first 5 years, however the supply is still well below this requirement (by 10%).

The position is the same with the past delivery, within only 359 net new homes delivered between 2017/2018 and an average of 595 dpa delivered over the past 5 years, significantly lower than the emerging (and stepped) requirement.

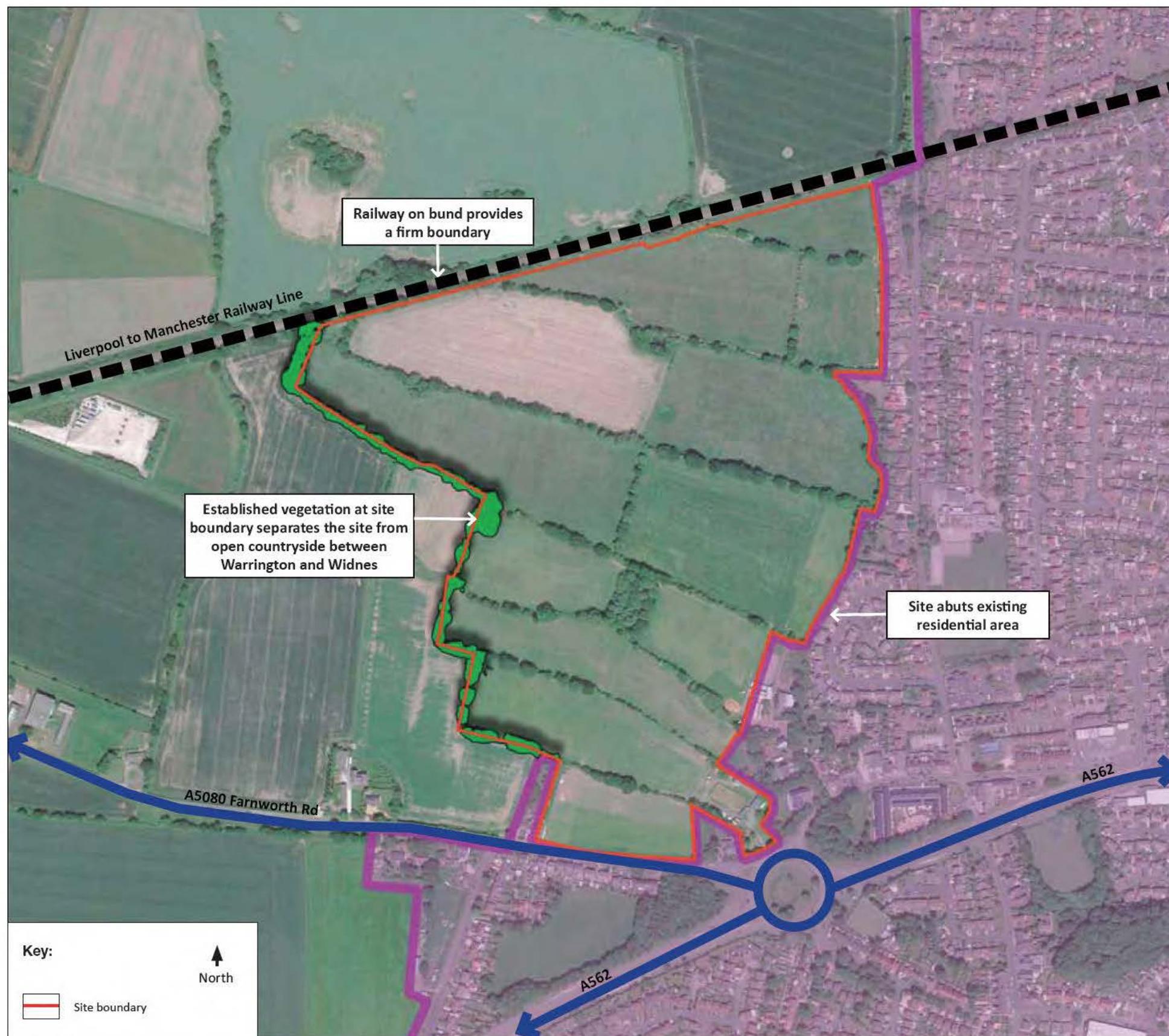
This acute supply shortfall is reinforced by the Housing Delivery Test results published by the government in February 2019 which confirm that Warrington delivered just 55% of its requirement over the last 3 years. The NPPF considers anything under 85% as significant under delivery (paragraph 73) and requires the Council to produce an Action Plan to boost supply, and to apply the 20% buffer to their 5 year supply calculations.

As such, it is clear that the Council cannot demonstrate a 5-year supply going forward, with our calculations suggesting that they are between 2.2 and 3.1 years depending on whether the full or stepped requirement is used, the approach taken to historic shortfall, and whether an allowance is added for windfall supply.

The position is the same across the 15-year period, where Warrington claim a supply of 9,226 dwellings, against an emerging requirement of 14,175, generating a shortfall of 4,949 dwellings.

The proposed residential development of this site will help to address this shortfall over the next 5 years and beyond and this should be considered as a key benefit of the scheme.

Figure 5: Green Belt Analysis: Plan to Demonstrate that the Site is Well Contained



## Demonstrating The Exceptional Circumstances for Green Belt Release

Paragraph 136 of the NPPF states that once the extent of a Green Belt has been established, it should only be altered in exceptional circumstances through the Local Plan Process, and the Council have acknowledged that such circumstances exist in Warrington. The exceptional circumstances which support the release of land at Stocks Lane, Penketh are as follows;

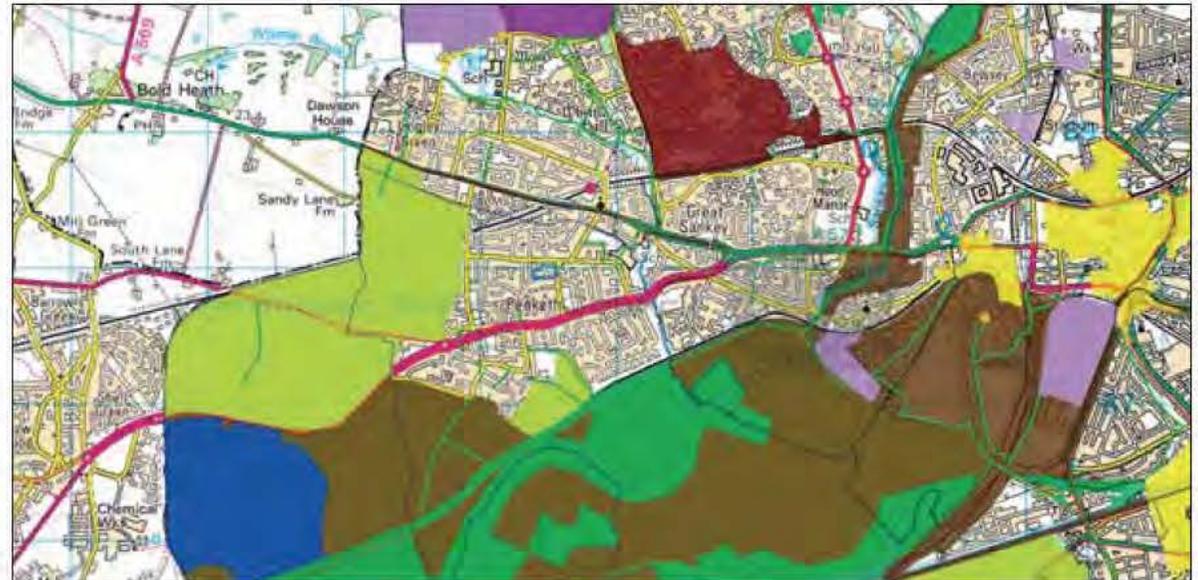
### Housing Need

The principal exceptional circumstances relating to the Green Belt land is directly tied to the need to accommodate Borough's projected needs over the plan period up to 2037, and to consider growth patterns in the wider Mid-Mersey housing market area.

A Strategic Housing Market Assessment for the Mid Mersey authorities (Warrington, Halton and St Helens) was produced in January 2016 and updated in May 2017. The updated report concluded that the objectively assessed need (OAN) for Warrington between 2015-2037 is 955 dwellings per annum (dpa). This showed a 14% increase from the 2016 assessment due to an increase in the demographic baseline and an improved economic outlook. Warrington's housing needs were also assessed as one of 8 authorities in the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) in January 2017, which suggested a similar OAN of 949 dpa over the period 2012-2037.

An updated Local Housing Needs Assessment (LHNA) was published in March 2019 as part of the submission plan consultation. This generated a standard methodology figure of 909 dpa over the period 2017-2027, to be applied to the full plan period. However, the LHNA also confirmed that 909 dpa would not support the anticipated jobs growth in the Borough and suggests an uplift to 945 dpa to achieve this. It also suggests a further uplift to 955 dpa to address affordable housing need (a 5% increase on the 909 dpa standard methodology figure).

Figure 6: Extract from proposals map



As demonstrated in the previous section, the Council are unable to demonstrate a 5-year supply of deliverable sites against their emerging target.

The emerging Local Plan must consider the implications of not releasing sufficient land from the Green Belt, and the harm that will occur from failing to meet the identified needs in the Borough; such as slower economic growth, a lack of labour force mobility, affordability issues, disruption to commuting patterns and the delivery of housing choice.

The proposed residential development of this site will help to address this shortfall over the next 5 years and this should be considered as a key benefit of the scheme.

### Insufficient Land

It is clear within the available evidence within the Warrington SHLAA and Urban Capacity Study that there is insufficient land within the Warrington's existing urban and greenfield sites to meet its housing and employment land going forward, and this is further evidence of an exceptional circumstance required to release land from the Green Belt.

The Council fully accepts that Green Belt land will need to be released to deliver approximately 7,064 homes and 215 hectares of employment land up to 2037; whilst our calculations suggest that land for up to 10,000 will need to be released, equating to over 50% of the total requirement.

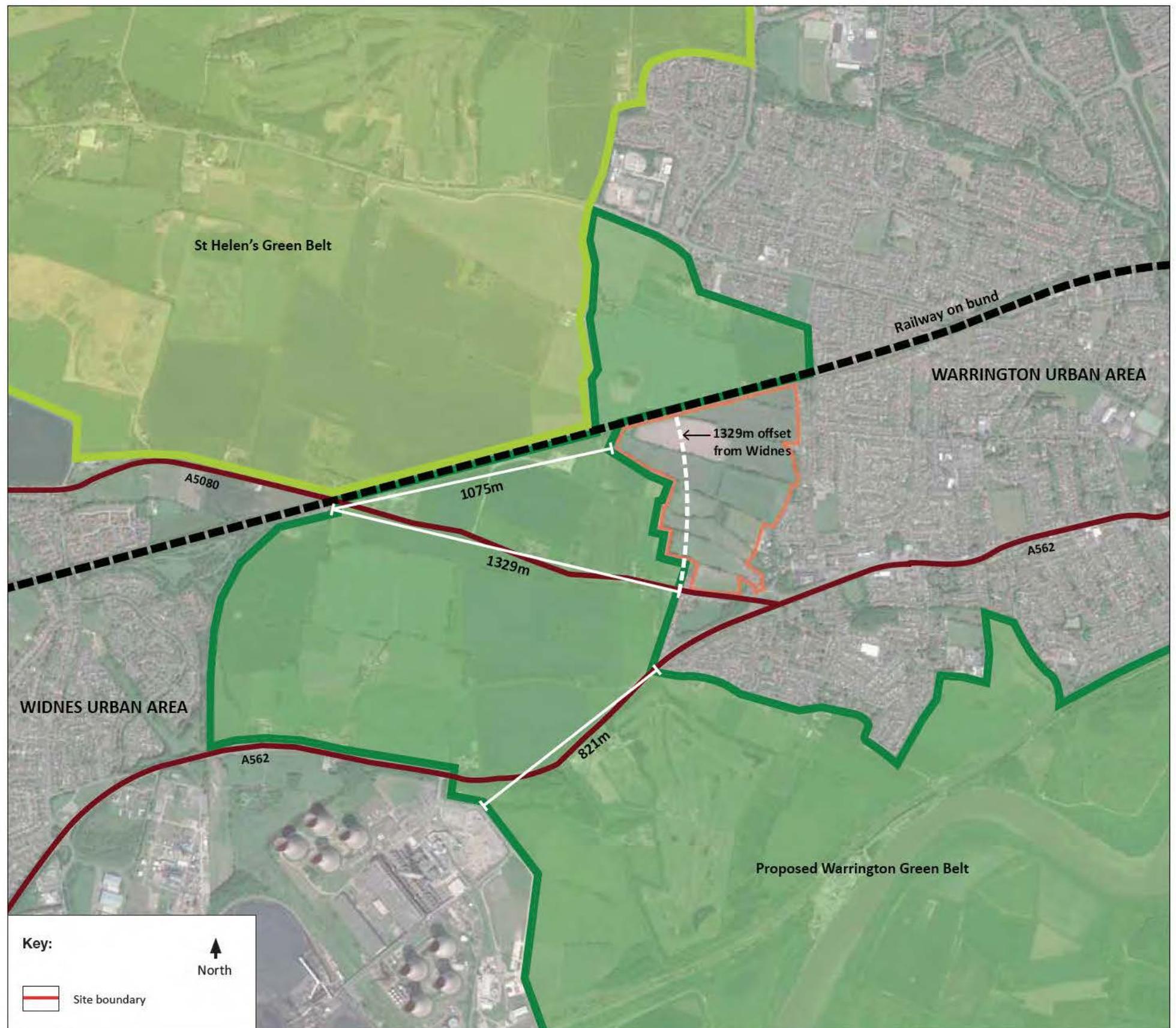
Therefore, it is clear that there is not enough land within Warrington's urban areas to meet the future development requirements of the emerging Local Plan.

### Affordable Housing Need

The 2019 Local Housing Needs Assessment identifies a net affordable need of 377 dpa, which has increased by over 70% since the 2016 Mid-Mersey SHMA target of 220 dpa and 120% since the 2014 Core Strategy target of 172 dpa. This suggests that affordable delivery is not keeping pace with demand and is reflected in the 2018 AMR which notes that there were only 82 affordable completions in 2017/18 and 72 affordable completions 2016/17. As such, there is a clear lack of affordable homes within the Borough.

It is evident that the delivery of large sites such as Stocks Lane, Penketh, which are viable, deliverable and available, will make a significant contribution to affordable needs within the borough, and this represents another exceptional circumstance.

Figure 7: Green Belt Analysis: Plan to Demonstrate Prevention of Merging Neighbouring Towns



## The Purposes of the Green Belt

To establish whether it would be appropriate to release a site from the Green Belt, it is relevant to examine how its development would impact on the five purposes of the Green Belt which are listed at paragraph 134 of the NPPF:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling.

Arup prepared an initial Green Belt assessment in October 2016 on before of Warrington Council which established Green Belt parcels around each of the settlements in Warrington. The site at Stocks Lane is located within parcel WR82.

An addendum report was published in June 2017 to take account of issues raised during the Regulation 18 consultation, specifically relating to some minor amendments required to certain parcel assessments and also the implications resulting from the updated position of High Speed Rail 2 (HS2). This report did not refer to this parcel.

In July 2017, a further Green Belt Assessment was prepared to assess each site which was submitted to the Call for Sites and assessed how important the site is for Warrington's Green Belt. This site (reference R18/138) was assessed in terms of the five Green Belt purposes and a rating provided. It is clear that the development of this site fails to fulfil these five purposes and below we provide details below, with comparisons to the Council's assessment.

### Will not result in unrestricted sprawl of large built up areas

The Warrington to Liverpool Railway Line and Farnworth Road form strong physical boundaries which restrict sprawl to the north and south. Although the site is open to the west, existing development at Doe Green to the south and Lingley Green to the north already extend out westwards making this a logical extension to Penketh, infilling and rounding-off at the edge of an urban area. As acknowledged in the Green Belt assessment, the built-up area to the east of the site is not durable however the development of this site would create a strong and defensible boundary along the western boundary to prevent urban sprawl. The Arup assessment rates this parcel as having a 'strong contribution' to this parcel however given the strong physical boundaries to the north/south and the existing development extending westwards, this parcel is considered to make a 'moderate contribution' to this purpose.

### Will not cause neighbouring towns to merging into one another

The development of the site would not close the gap between Penketh and Widnes as the closest point between the two is already established by development at Doe Green to the south (with an off-set of 1.6km), and this gap would be maintained by the proposed development. The Arup Green Belt assessment rates this parcel as having a 'weak contribution' to this purpose and this rating is supported.

### Will not cause unacceptable encroachment into the countryside

As with all Green Belt release sites, the development of the site will inevitably result in the loss of some open countryside. However, the railway line and the main road provide strong defensible boundaries preventing encroachment to the north and south and ensure that the site is not particularly tranquil location or one with intrinsic beauty, which is typically associated with the countryside. The presence of dense vegetation within and surrounding the parcel prevents open long line views into the open countryside. The Arup assessment considers this parcel to make a 'strong contribution' to this purpose however as demonstrated above, this parcel serves little function as countryside and its loss would not be unacceptable. This parcel is therefore considered to make a 'moderate/weak' contribution to this purpose.

### Will not impact on the special character of historic towns

Warrington is a historic town however the site is located over 4km from the Warrington Town Centre Conservation Areas, and the site does not cross an important viewpoint of the Parish Church. Widnes is also a historic town however similarly the site is located over 4km from its conservation areas. There is a Grade II listed Farm (Brookside Farm) at the south west corner of the site, however, this is heavily screened by trees, and is already flanked by existing residential development, which ensures that development of the site will have minimal impact on its setting. The Arup assessment no contribution to this purpose and this rating is fully supported.

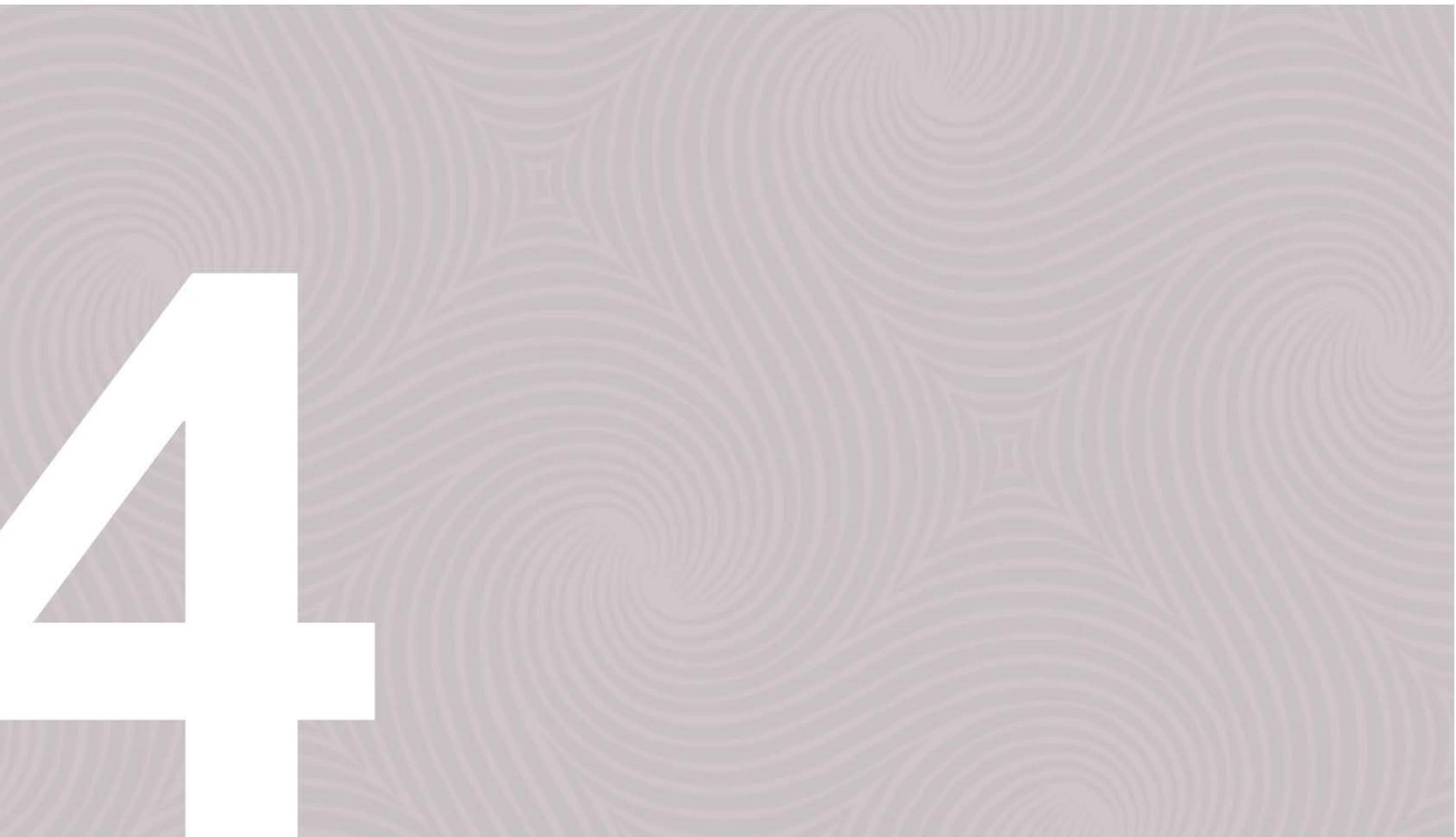
### Will not discourage urban regeneration

As noted, the Council fully accept that there is insufficient land within Warrington's existing urban and greenfield sites to meet its own needs for housing and employment land going forward, and therefore no individual Green Belt parcel is making any contribution to urban regeneration. The Arup Green Belt assessment suggests that all parcels make a 'moderate contribution' to this purposes, however it is considered that this should be changed to 'no contribution' throughout, for the reasons set out above.

## Conclusion on Green Belt Release

**The latest housing evidence set out in this section has demonstrated that there is insufficient land within Warrington's existing urban areas to meet the development needs of the emerging Local Plan. This represents a clear exceptional circumstance for Green Belt release, which the Council fully acknowledge.**

**Given that the Stocks Lane site does not fulfil the five purposes for including land in the Green Belt and is a sustainable and deliverable site, it is recommended that it be released from the Green Belt through the Local Plan Review process to help meet future housing needs.**



4

# 4.0

## Landscape and Visual Analysis



## 4.0 Landscape and Visual Analysis

### Landscape Character Context

The site is situated within Landscape Character Area (LCA) '1F – Penketh & Cuerdley, Type 1: Undulating Enclosed Farmland' in Warrington Borough Council's Landscape Character Assessment (2007). The nearest adjacent LCA to the site is 'FF4 Bold Heath, Floodplain Farmland' (St Helen's Council's Landscape Character Assessment, 2006), which lies to the north west of the site. Despite the close proximity to the site, the presence of the raised railway line between the two LCAs prevents any significant visual or physical relationship between them.

The site has no direct relationship between any other LCA in the vicinity. Appropriate development on the site would not result in any adverse effects upon adjacent Landscape Character Areas.

### The Site as part of LCA '1F – Penketh & Cuerdley'

The site is situated on the north eastern edge of LCA '1F Penketh & Cuerdley', immediately adjoining the urban edge of Penketh.

The key characteristics of this LCA are described as:

- Forms a buffer of agricultural open-space between surrounding urban, suburban and industrial development;
- Visually dominant effect of Fiddlers Ferry Power Station;
- Expansive views across the Mersey Valley to the south;
- Predominantly arable land with a medium to large-scale field pattern;
- Absence of cohesive hedgerows and hedgerow trees;

- Golf facilities and horse grazing paddocks to the south of A562;
- Penketh Brook and associated tree lined banks.

Penketh Brook flows through the southern part of the site, however the majority of the key characteristics of area 1F Penketh & Cuerdley are not representative of the site. The site generally has contrasting characteristics to the wider landscape character area.

The site has an urban-fringe identity, being directly surrounded by residential areas to the east and south, and an elevated railway track to the north. There are no views of the Mersey Valley to the south.

The site is comprised of a small scale field pattern, subdivided by a cohesive network of trees and hedgerows. This contrasts with the larger field patterns and reduced presence of vegetation in the wider landscape character area to the west and south. The visual dominance of Fiddlers Ferry Power Station is reduced in comparison to the wider landscape character area due to well vegetated field boundaries which enclose and bisect the site, providing multiple layers of natural screening to filter views.

The LCA describes the key elements of 'landscape sensitivity' as:

- Locally open vistas;
- Pressures from the urban fringe;
- Dominance of Fiddlers Ferry Power Station;
- Power lines and cables.

Due to its semi-enclosed nature, the broadly flat landscape, and a lack of existing public access, the site does not form a significant part of any prominent locally open vistas. The site generally has an urban fringe character due to the visual prominence of existing residential properties around the site and the visual detachment from the wider landscape. The vegetation on the site assists in reducing the visual dominance of

Fiddlers Ferry Power Station and there are no power lines passing through the site. The site is therefore considered to be less sensitive to change than the wider landscape character area.

The LCA considers negative changes in the landscape that have occurred and recommends management practices for the future. Appropriate development of the site could help to rectify some negative changes and put recommended management practices in place, to achieve landscape objectives such as:

- Ensure high quality hedgerows and trees are retained and enhanced, with an appropriate planting and management regime;
- Plant native woodland trees at site boundaries to create an attractive edge to development and to assist with filtering views to the power station;
- Re-establish orchard areas as features of the landscape that connect to the past and encourage a healthy lifestyle and a connection with nature, to benefit the present and future communities in the area;
- Improve planting and habitat diversity associated with Penketh Brook;
- Reduce the pressure on the rest of landscape character area for passive recreation and development by providing designated public open space areas within the site.
- Retain the existing minimum distance of open space between Widnes and Penketh.

Figure 8: Landscape Character Context

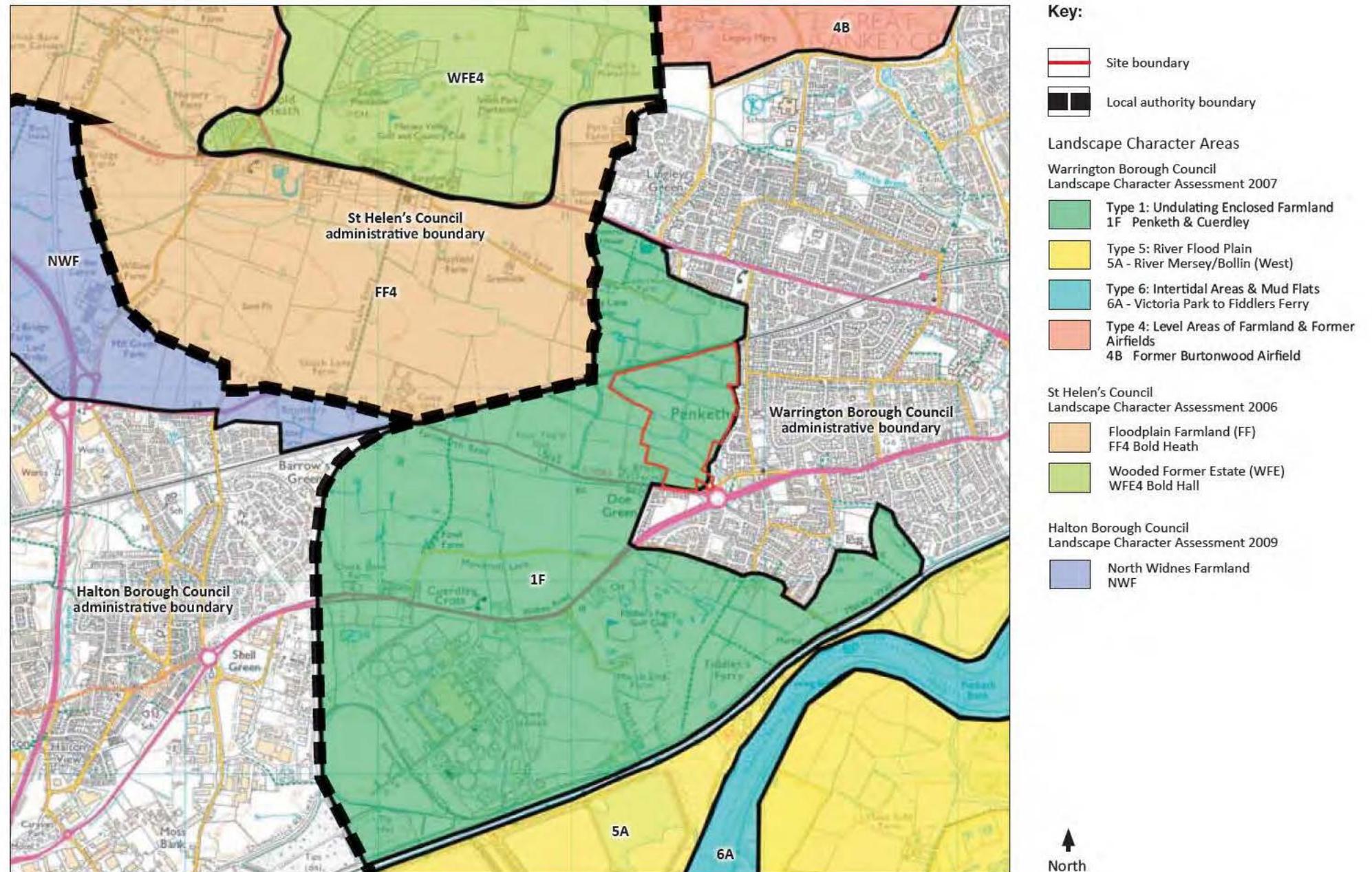
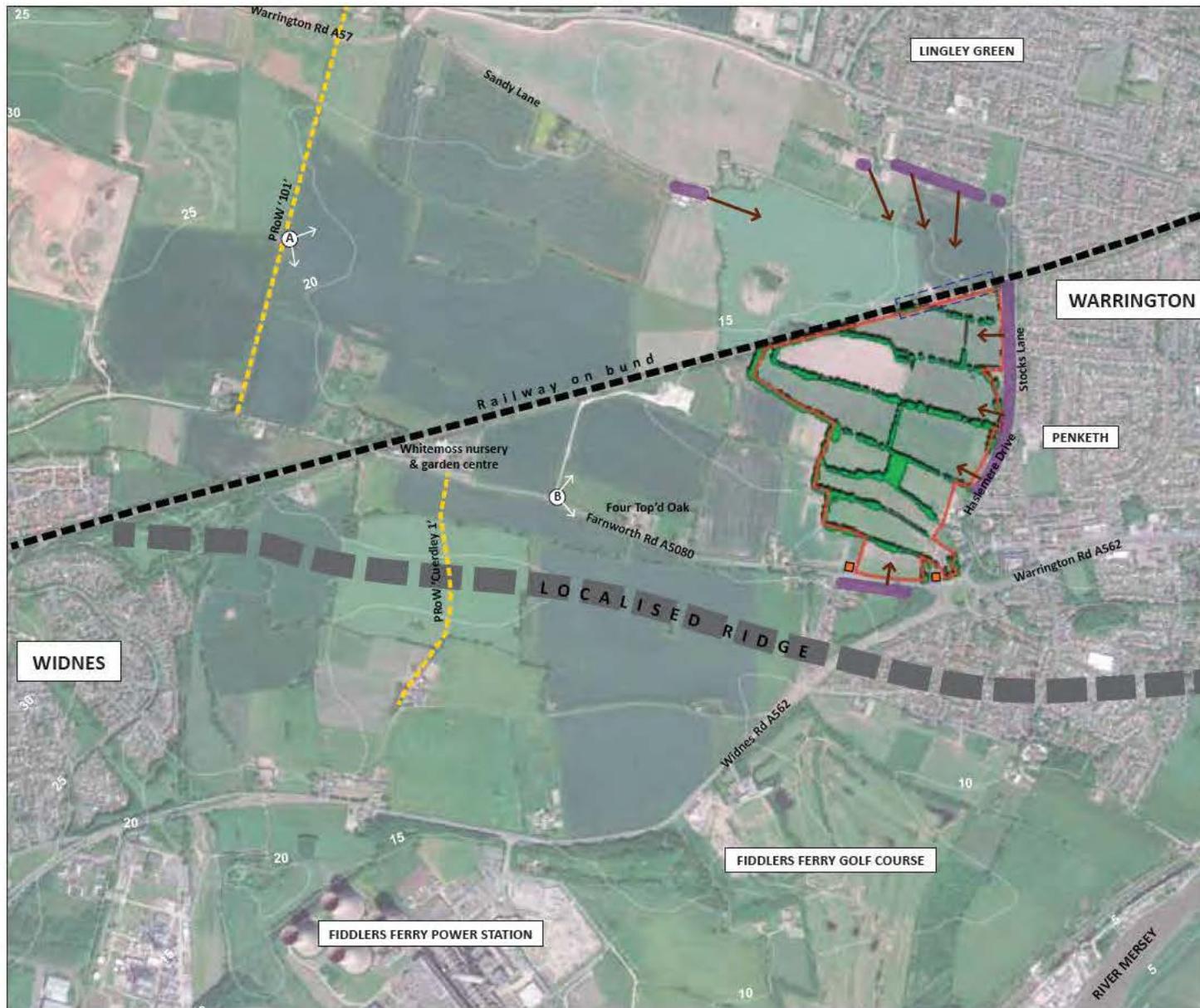


Figure 9: Visual Context of the Site



Key:

-  Site boundary
-  Public Right of Way (PROW)
-  Railway on bund restricts views
-  Area of decreased bund height
-  Ridgeline of higher ground prevents long distance views from the south
-  Residential area with views of site
-  Partial views to site
-  Residential properties framing the site
-  5m Contours with annotation
-  Vegetation within the site
-  Viewpoint location



Viewpoint A - View towards the west of the site from South Lane Entry PROW 101

## Visual Context of the Site

The site at Stocks Lane has generally limited visibility in the wider landscape due to the relatively flat nature of the land and the existing vegetation within the site, at site boundaries and in the wider landscape.

Views to the site from the north are mostly restricted by the elevated Liverpool-Manchester railway line which is located within an otherwise relatively flat landscape. A slight decrease in bund height at the edge of Warrington allows some views into the northern part of the site from residential properties at the southern edge of Lingley Green. In views from the north, including the view from Public Right of Way '101', tree canopies within the site can be seen above the railway bund. Fiddlers Ferry power station forms a prominent landmark on the horizon. High land at Appleton/Stretton forms a backdrop to the view.

Views to the site from the east are limited to views from 1-2 storey private residential properties on Stocks Lane and Haslemere Drive which back onto the site. Views beyond the site are generally limited due to the mature tree lined field boundaries and the elevated railway. The mature existing vegetation on the site assists in filtering views to Fiddlers Ferry power station from residential properties along Stocks Lane.

From the south there are views into the site from existing properties on Farnworth Road. Views are limited to the southern two fields of the site. Existing trees and hedgerows screen views into the wider site beyond. Existing residential properties on the north side of Farnworth Road frame the view of the site.

An existing Public Right of Way (Cuerdley 1) passes through the open land to the south of Farnworth Road. There are no clear views to the site from the PROW.

The site is screened by trees and hedgerows in the foreground and at the site boundaries. A slight ridgeline in the topography between the railway line and Widnes Road A562, in an otherwise relatively flat landscape, limits the visibility of the site from areas further south.

There are limited views of the site from the west. The area of visual influence is restricted to a triangle of land located between the site, the railway line and Farnworth Road. Visual receptors within this area are limited to an occasional farm, isolated residential and commercial properties. There are no Public Rights of Way through this area. In occasional fleeting views from Farnworth Road, vegetation at the site boundary and within the site can be seen. There are no open views into the site.





# **5.0**

## **Vision for the Site and Masterplan**





## 5.0 Vision for the Site and Masterplan

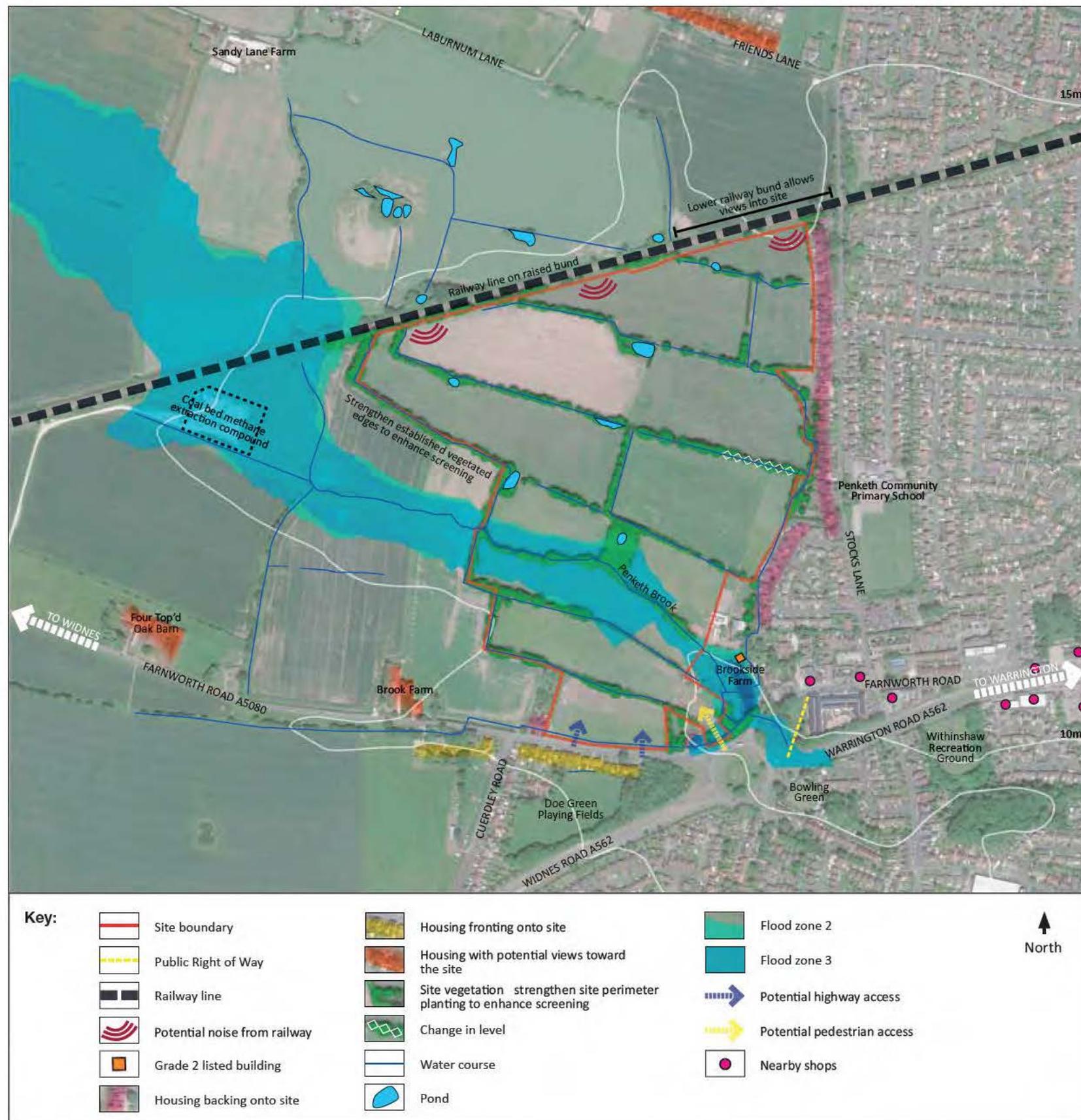
**An attractive housing development with distinctive local character offering a choice of high quality new homes to meet local needs.**

Taylor Wimpey's vision for the site seeks to meet the following goals:

- Delivery of quality new family homes which make the best use of available land and meet the needs of Warrington Borough Council;
- Achieve a choice of housing with a mix of house types, tenures and sizes to meet identified local needs;
- Respect the character of the site and its setting;
- Provide high quality, accessible green space for the benefit of existing and future residents;
- Provide pedestrian and cycle connections through the site to enable access to the green infrastructure;
- Invest in the community with the creation of additional direct and indirect employment both during construction and after completion of the development;
- Create a safe and desirable place to live with a safe and attractive environment that builds upon the strength of the local community;
- Provide high quality design which will complement and enhance the existing environment in Penketh and create a good standard of amenity and living environment;
- Protect existing residential amenity; and
- Capitalise on site assets such as ponds, trees and hedgerows.



Figure 10: Site Analysis Plan



## Approach

Taylor Wimpey has developed a visionary masterplan for the site which meets these objectives and is presented in this section. It demonstrates how the design and form of development will respond sensitively to the characteristics of the site and the wider area, and explains the contribution that the site could make to Penketh. It is intended that these ideas will evolve further in consultation with the local community and key stakeholders at the appropriate time.

## Site Opportunities and Constraints

The vision for the site derives from a careful analysis of the characteristics for the site, its context, and the opportunities and constraints which arise.

The site has a limited visual relationship with the wider landscape, due to the elevated Liverpool-Manchester railway line immediately north of the site boundary, and the cohesive network of internal and boundary trees and hedgerows within the site. The most visible part of the site is the southern site frontage onto Farnworth Rd. This area has potential to provide an attractive frontage to new development.

There are views into the site from some existing nearby residential development. Appropriate masterplanning of the site can ensure that residential amenity of existing nearby residents will be protected.

The western edge of the site is not visually prominent due to existing vegetation at the site boundaries which is comprised of trees and hedgerows. There is potential to strengthen this existing vegetation with additional landscaping to create an appropriate edge to new development and to provide an appropriate and attractive transition between the urban and rural area. Outward facing housing at the eastern edge of the site would create a positive western edge to Penketh.

The largely flat site is currently in agricultural and equine grazing use. Mature tree and hedge lined ditches form strong vegetated boundaries that dissect the fields, frequently adjoined by small ponds surrounded by trees. These features are a prominent characteristic of the 'Penketh & Cuerdley' character area and their retention provides an opportunity to create a development with a strong sense of landscape maturity and a 'green' character. Any vegetation loss required to enable vehicular access through the site would be minimal and could be mitigated by providing new native tree and hedgerow planting throughout the development.

Penketh Brook passes through the site flowing eastwards. The brook has associated flood zones within which residential development should be avoided. There is potential to incorporate the corridor of Penketh Brook into a wider green infrastructure network through the site.

Development should include an appropriate landscape buffer area between the railway line and any new residential properties to minimise any noise impacts upon future residents.

There are no existing underground services within the site. To the west of the site boundary is a 'Coal Bed Methane Extraction Compound', however this does not present any constraint to development.

There is potential to provide two safe highway access points into the site from Farnworth Road to the south, and pedestrian/cycle access from the roundabout on the A562. The pedestrian/cycle access would enable convenient access to existing shops, schools, public transport routes and formal recreation areas which exist in close proximity to the site.

There is currently no public access into the site. Development of the site provides an opportunity to create new publically accessible routes through an attractive greenspace network which will be delivered alongside new residential development. This would enhance accessibility to informal naturalistic open space for existing and future local residents, who currently have restricted access into the countryside due to limited Public Rights of Way in the local vicinity.

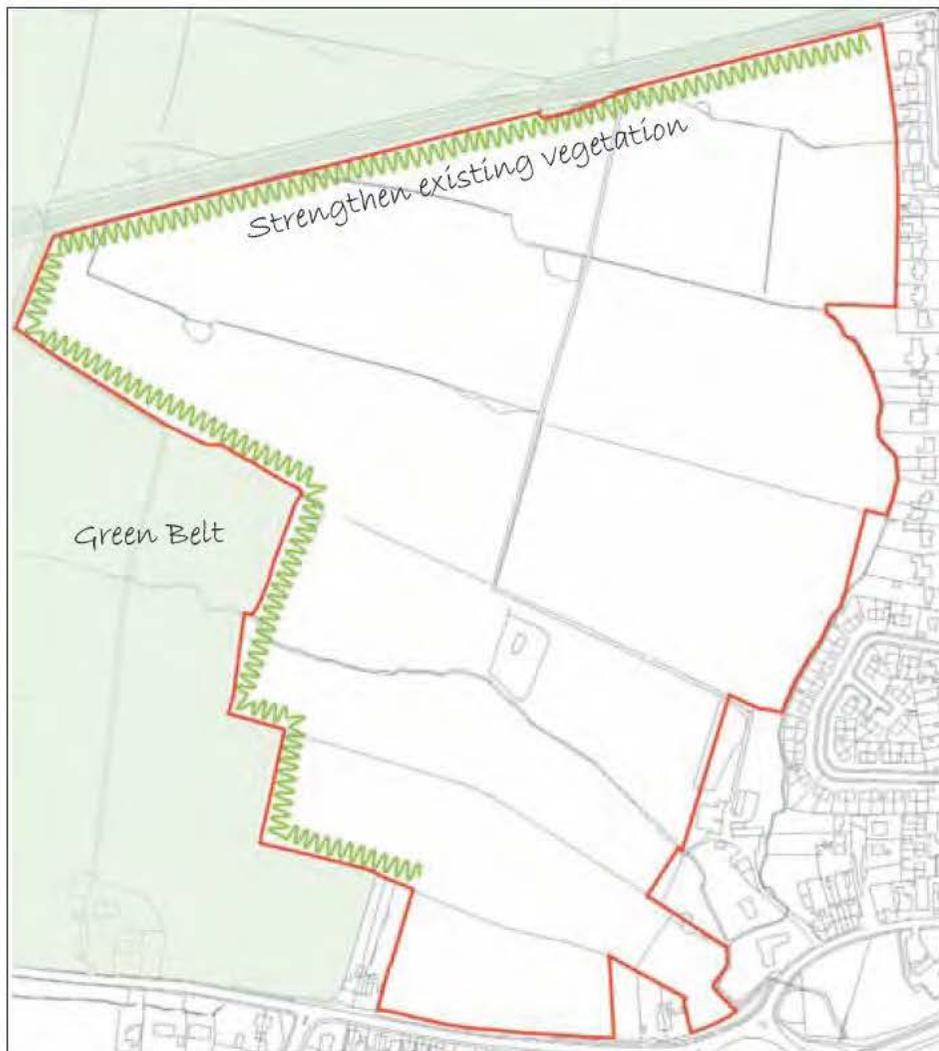
The key principles of development arising from the site opportunities and constraints are:

- Strengthen existing site boundaries and create a positive urban edge;
- Improve the western 'gateway' into Penketh and Warrington;
- Retain and enhance the site's existing character;
- Maximise opportunities for informal recreation, habitat diversity and sustainability associated with Penketh Brook flood zone.

There is potential on the Stocks Lane site to develop a high quality residential scheme with a coherent landscape structure which conserves the natural assets present on the site, as well as improving the recreational facilities and connectivity within Penketh.

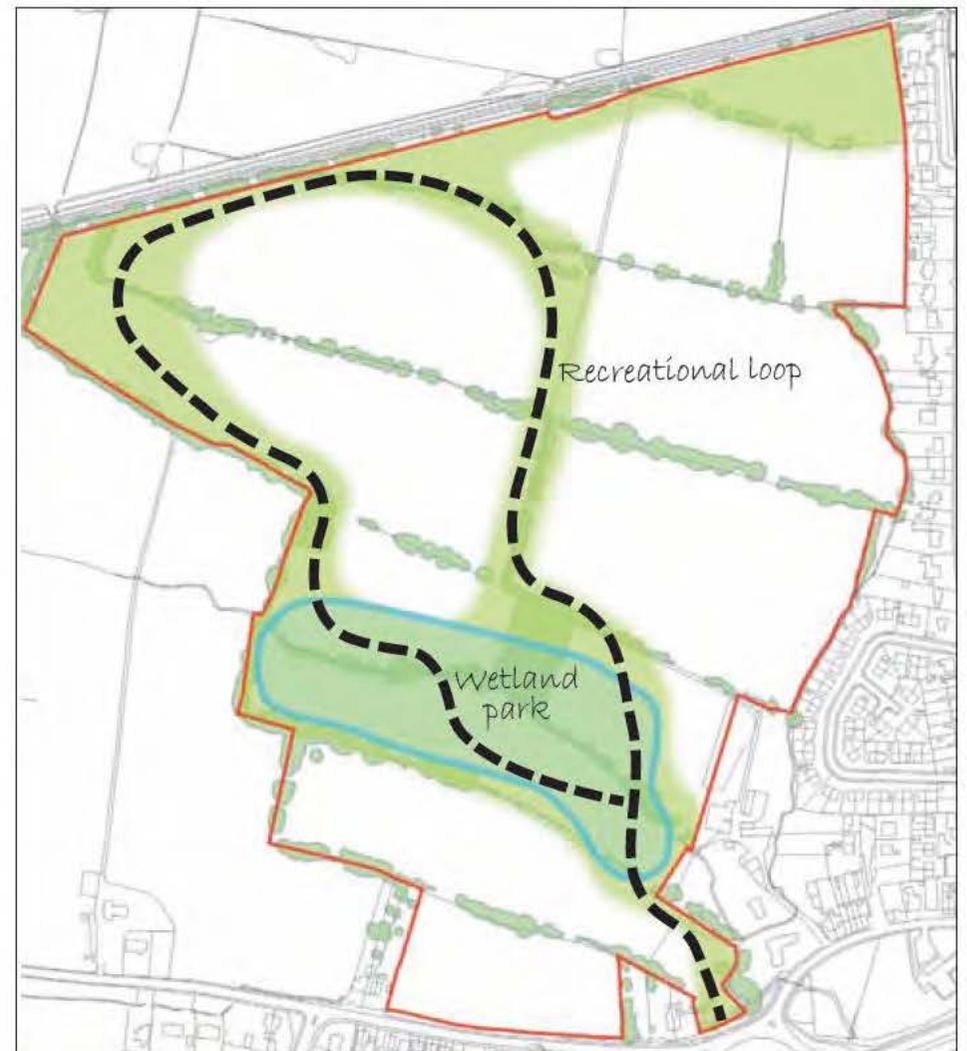
Figure 11: Concept Plans

## Development Concepts



### Concept 1

Strengthen existing vegetation at western and northern site boundaries to create a new and defensible Green Belt boundary.



### Concept 2

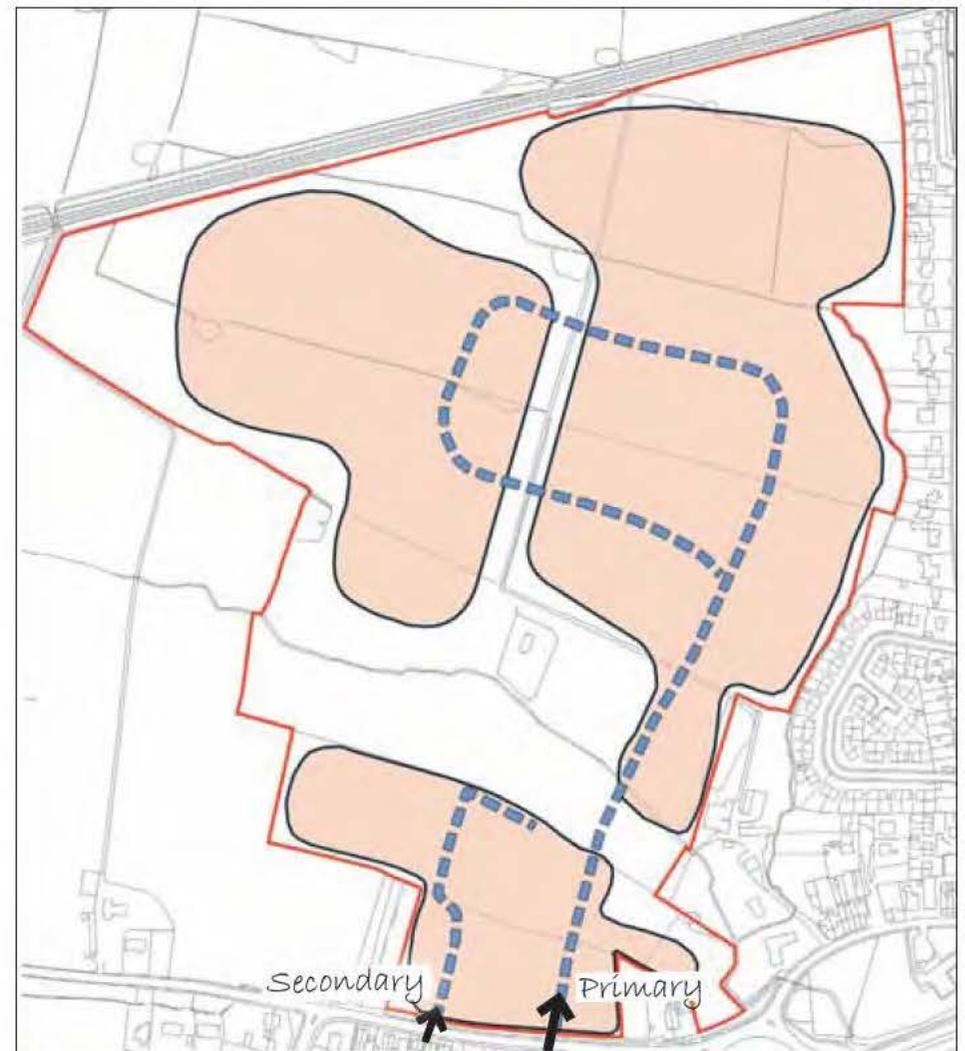
Retain existing valued landscape features and create a naturalistic, publicly accessible recreational loop around the site, including a new wetland park.





### Concept 3

Provide high quality, outward facing housing arranged to overlook green spaces and the site entrance; and to create a positive edge to the northern and western edges of the development at the interface with the Green Belt.



### Concept 4

Provide two vehicular access points to the site along Farnworth Rd. The primary access to the east will mainly serve development north of Penketh Brook; the secondary access point will serve a smaller development area south of the Brook.

↑  
North

Figure 12: Illustrative Masterplan



## Illustrative Masterplan

The masterplan illustrates how the site could be laid out to ensure that the objectives illustrated by the key concepts can be met. An attractive residential area which will complement Penketh and Warrington is proposed.

The proposed masterplan is designed to capitalise on the existing field pattern and landscape features of the site. The rectilinear network of trees, hedgerows and ditches will be retained within greenways to provide a mature and attractive setting to the proposed housing areas. This 'green' character of the development will provide an appropriate transition from the existing urban area of Penketh into the more characteristically 'open' landscape to the west of the site.

A network of publically accessible recreational green space is proposed throughout the site with a new landscaped 'wetland park' at its core, based around Penketh Brook. This will provide a naturalistic environment for existing and future local residents to enjoy in an area where public access to naturalistic green space is currently limited, while also enhancing habitat value and biodiversity of the water network and associated hedgerows and trees.

Beyond the wetland park the green space network will provide a recreational loop around the site which will be accessible from a pedestrian/cycle link onto the Farnworth Road roundabout to enable convenient access for all. A 'natural' themed play space, an orchard and retained ponds will add interest to the green spaces throughout the development.

There will be potential to incorporate new ponds and swales as part of a sustainable drainage system into the green space network.

Additional landscape treatment in the form of trees and understorey planting will be provided along the northern and western edges of the site to strengthen the existing 'green' edge of the site which provides a buffer to the more 'open' landscape to the west.

The residential development areas will be served from two highway access points located on Farnworth Rd. The eastern access will form the primary route into the site, serving the majority of

the development, including the residential areas to the north of Penketh Brook. The western access will be a secondary access serving dwellings in the southern part of the development to the south of Penketh Brook. The two accesses will be linked by controlled emergency access routes, which will also provide additional emergency vehicle crossing points over Penketh Brook into the northern part of the site. The emergency routes will provide pedestrian/cycle routes for everyday use.

The internal road network will be comprised of a meandering spine road loop which will link to a series of secondary road loops, cul-de-sacs and private drives. The main entrance into the site from Farnworth Road will be designed to provide an attractive frontage to the site.

The eastern edge of the proposed residential area will front onto existing housing located along Stocks Lane and Haslemere Drive, which backs onto the site. An existing ditch along the eastern edge of the site will be retained within a green space corridor in order to retain the security and residential amenity of the existing properties.

At the western and northern edges of the development perimeter housing will be arranged to face outwards onto the proposed public open spaces which frame the site. This will create a positive outward facing edge to the development.

The high quality residential scheme proposed will deliver the following key features:

- Up to 600 dwelling;
- Approximately 12 hectares of accessible, safe and multi-functional greenspace, providing recreational and environmental benefits;
- Extensive new footpaths and cycleways encouraging sustainable transport and informal recreation.

The masterplan demonstrates that the site is capable of delivering a high quality scheme which will complement the wider area and deliver a range of attractive benefits.

Figure 13: Illustrative Hand Drawn Sketches

## Hand Sketch 1

View of proposed development frontage to green space



Existing site photograph



For illustrative purpose only



## Hand Sketch 2

View of proposed development fronting existing trees and hedgerow



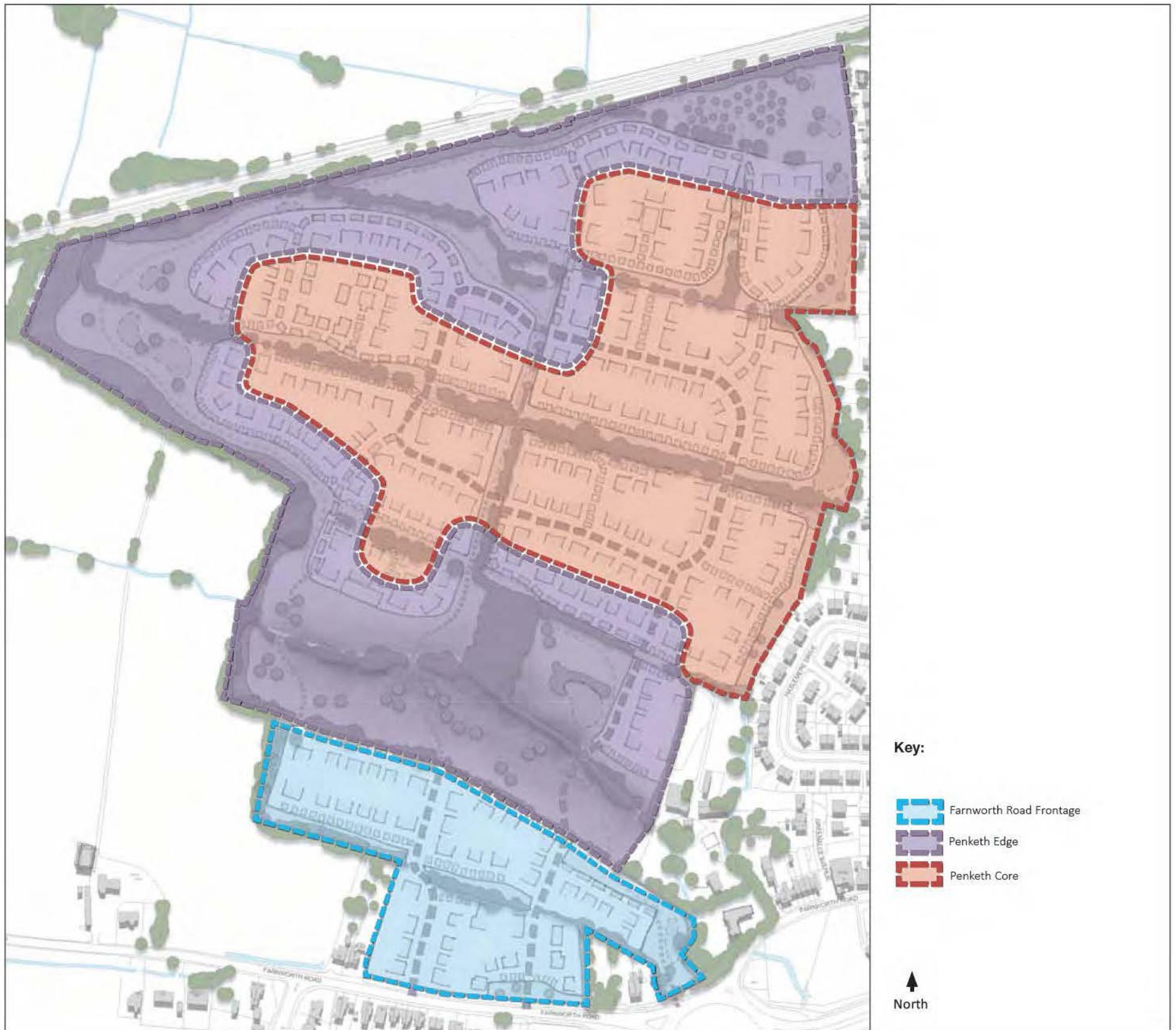
Existing site photograph



For illustrative purpose only



Figure 14: Character Areas



## Character Areas

Development character is a function of layout, building style and landscape treatments, which combine to create a sense of place.

### Farnworth Road Frontage

The entrance to the development will be designed to create an attractive and high quality residential area which will be developed at densities of approximately 35 dwellings per hectare. This higher development density will provide an indication that the area enables access to the wider development and will make the most of the close proximity to existing public transport routes along Farnworth Road. Built form will be arranged to create a positive frontage to Farnworth Road with properties generally restricted to 2 storeys. Building materials will comprise some red brick with a high proportion of white render to complement existing dwellings in the vicinity. A small focal greenspace and view line along the primary entrance road will provide a glimpsed view towards the new 'wetland park'.

### Penketh Edge

This area will be designed to provide a lower density attractive edge of development, developed at approximately 30-32 dwellings per hectare. It will feature a high proportion of semi-detached and detached properties, arranged in an organic form with curved edges to soften the built edge. Housing will generally be restricted to 2 storeys to compliment adjacent informal open green spaces and rural edges. External building materials to the dwellings will consist mainly of red brick, to reflect the current material palette of the existing residential edge of Penketh. The majority of housing will have front gardens with parking to the front or side, served mainly by secondary roads, cul-de sacs and private drives. Vegetated

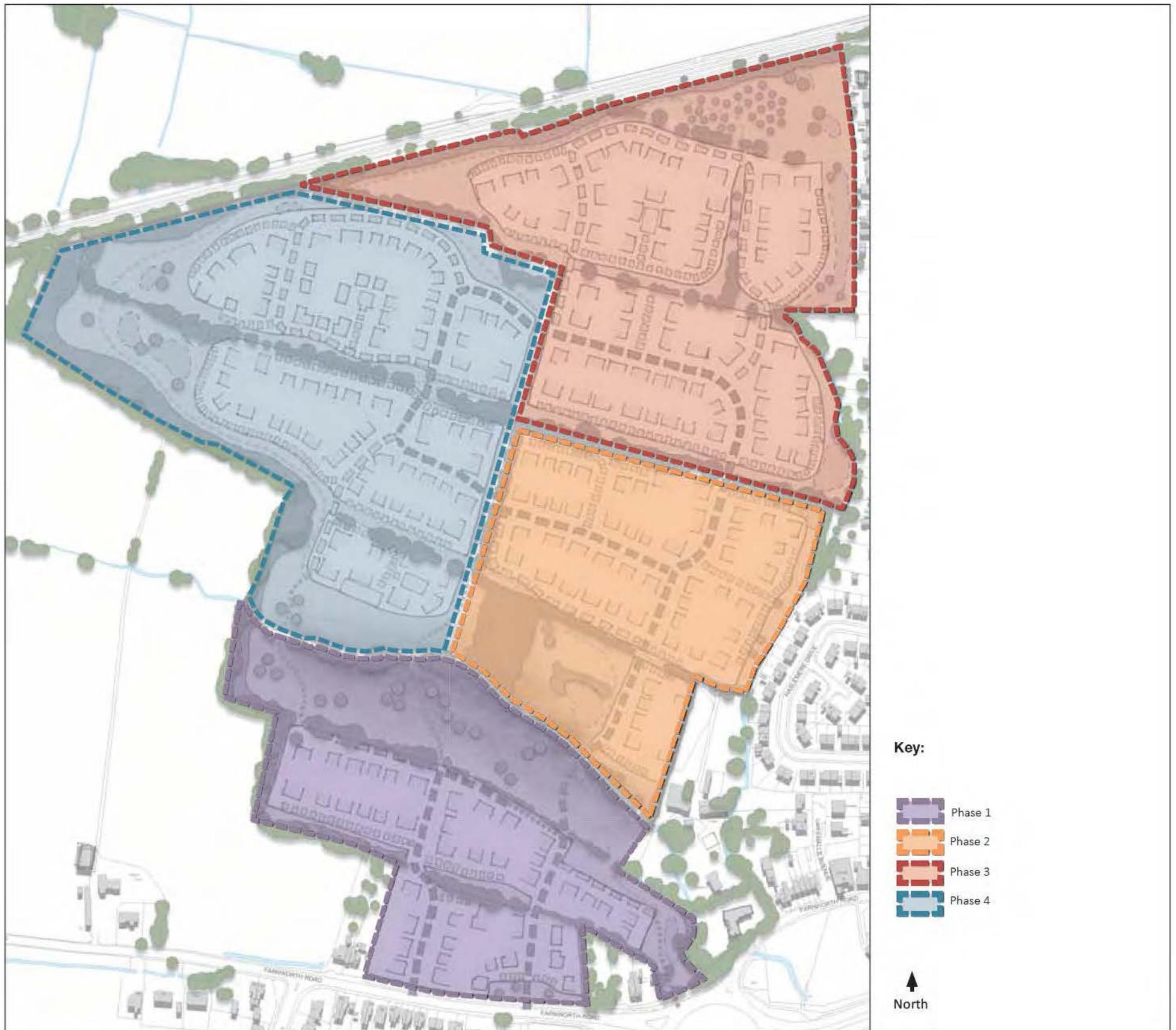
edges to the site will be strengthened with woodland tree belts and informal tree planting will be prominent in open spaces to create a semi-rural character to this part of the development. Pedestrian routes will meander informally around the woodland belts, orchard and green open spaces within the site.

### Penketh Core

The inner-eastern part of the site has a limited visual connection with the wider landscape and therefore has greater flexibility regarding its character. This enables slightly higher development densities of approximately 32-35 dwellings per hectare and creates opportunities for some variety within the external building material palette, including rendered facades. In order to retain the existing vegetated field boundaries and reflect a transition in character towards the existing urban area, the housing is envisaged to be in a more standardised, geometric arrangement. A meandering central spine road will feed onto a series of secondary loop roads, cul-de-sacs and private drives, creating a primary closed loop within the eastern core. Housing which fronts onto the vegetated field boundaries and pedestrian/cycle routes will include a higher proportion of detached and semi-detached properties, while the internal streets will provide a wider range of housing styles. Properties will range from 2 to 3 storeys, with housing adjacent to existing bungalows restricted to 2 storeys.

Field boundary vegetation will be enhanced as appropriate and the characteristic ditches and watercourses will be retained wherever possible. Selective hedgerows and occasional tree planting will be introduced to the eastern site boundary, to improve the privacy to dwellings backing on to the site. Within the core lies a proposed central pedestrian/cyclist accessible greenway running north to south, connecting and enhancing existing valued landscape features. This extends to the pedestrian/cycle routes within the Penketh Edge character area to create an interesting loop around the site with varied character.

Figure 15: Phasing Plan





## Phasing

It is anticipated that the site could be developed over a 15-18 year period. On this basis, 4 potential phases of development are indicated on the adjacent plan. The proposed development phases would logically and gradually extend development around the existing infrastructure of Farnworth Rd before extending northwards along the existing residential edge of Penketh, finishing with the western rural edge. This proposed phasing of development ensures that the existing residential edge gradually extends from its current alignment.

**Phase 1** would include the development of land south of Penketh Brook and adjacent to Farnworth Rd, including the creation of the highway access into the site, leading towards Penketh Brook. This would deliver approximately 110-115 dwellings over 3-4 years.

**Phase 2** would extend development north eastwards and would complete the construction of the raised primary road crossing over Penketh Brook. This would deliver approximately 110-120 dwellings over 3-4 years.

**Phase 3** would complete the development of the north east part of the site up to the railway line. This would deliver approximately 155-165 dwellings over 4-5 years.

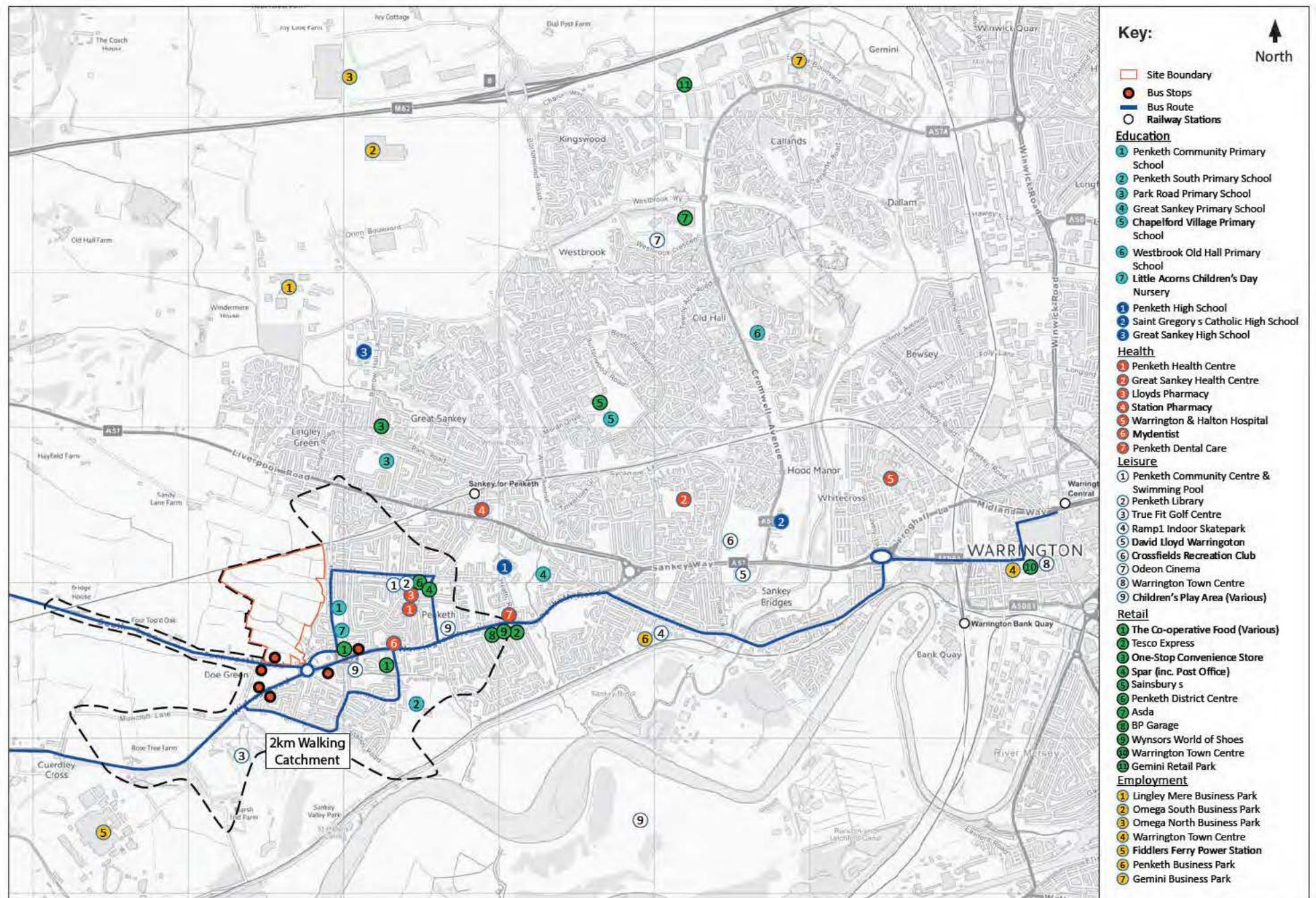
**Phase 4** would extend development to the north west of the site and complete the emergency access track and pedestrian/cycle route over Penketh Brook. This would deliver approximately 160-175 dwellings over 5 years.



# **6.0** **Sustainable Development Principles**



Figure 16: Sustainability Plan



## 6.0 Sustainable Development Principles

The Stocks Lane site represents a highly sustainable solution to the Borough's housing needs which will generate economic, social and environmental benefits in accordance with the three pillars of sustainable development, whilst delivering the type, quality and quantity of new homes to support the growth of Warrington over the Local Plan period.



### Location and Accessibility

The proposed development site is located to the west of Penketh, approximately 5.5km west of Warrington town centre. The site lies to the north of the A5080 Farnworth Road, which meets the A562 Warrington Road immediately south-east of the site at a five-arm roundabout. The A562 Warrington Road subsequently meets the A57 Sankey Way, a key radial route into Warrington town centre from the west. To the west of the site, the A5080 Farnworth Road runs westwards towards Widnes and the M62 / M57 interchange beyond.

The site is bounded to the north by the Warrington to Manchester and Liverpool railway line. Farnworth Road lies along the southern boundary of the site and provides highway frontage to the development site.

Figure 16 presents details of the sustainable accessibility of the proposed development site, highlighting its accessibility to a range of key facilities and services. The plan indicates that the site is well connected by existing bus services, providing connections to local facilities and to Warrington town centre, including its two railway stations and the range of employment, retail and leisure opportunities within the centre. There is also a range of local facilities within reasonable walking and cycling distance of the site.

The nearest bus stops to the site are located on Farnworth Road approximately 350m from the centre of the site. These stops provide access to a 30-minute frequency service during the daytime to Warrington and Liverpool. The journey time from Farnworth Road to Warrington town centre is approximately 15-minutes. Additional bus services are provided from the A562, providing additional services to Warrington, Widnes and the surrounding local areas.

Sankey for Penketh railway station is also c.2.5km from the site, which is approximately a 30-minute walk, or an 8-minute cycle. Sankey for Penketh station provides connections to Warrington, Liverpool and Manchester.

The site is also well located to provide access to the town's key road network via the A57 Sankey Way and to the Strategic Road Network via Junction 8 of the M62 which lies approximately 6km north of the site. Local employment opportunities at Omega, Gemini and Birchwood are within 10 - 20 minutes' drive of the site, with Birchwood also being accessible via rail from Sankey for Penketh station.

## Community Facilities

Figure 16 illustrates the extensive range of key facilities and services located within the vicinity of the proposed development at Stocks Lane. The figure also highlights a 2km walking catchment around the site - considered an acceptable walking distance to many facilities, equating to a 25-minute walk. This catchment encompasses many local facilities within Penketh, including primary schools, local convenience stores, a health centre, pharmacy and dentist, Penketh district centre and other facilities.

Table Key Facilities sets out details of a selection of these key services, highlighting their location and respective distance from the centre of the site.

The table opposite identifies a number of community facilities within a 2km walking catchment of the site, including a cluster of facilities at the Penketh district centre (post office, bank, library, convenience store) and the adjacent Penketh swimming pool and community centre. These facilities are accessible on foot, by cycle or by bus from the site. In addition, two children's play areas are located along Warrington Road, again within 2km of the site.

Penketh Community Primary School is located close to the site, on Stocks Lane, and Penketh South Primary School is within 2km of the site. Penketh High School is located just over 2km from the site and is a 30-minute walk or 7-minute cycle from the centre of the site, and accessible by bus from the services which run adjacent to the site. Little Acorns Children's day nursery is located on Stocks Lane a short walk from the site.

Penketh Health Centre is located adjacent to Penketh District Centre and is within 2km of the site and include a GP surgery, a pharmacy is located opposite the Health Centre. MyDentist is located on Warrington Road and is within 2km of the site.

Overall it is concluded that the site is well located in terms of its accessibility to key services, minimising the need to travel and maximising the potential use of sustainable travel modes. The site accords with the sustainable development principles set out in the NPPF.

### Community Facilities

The site is located in close proximity to a number of community facilities that could be accessed and utilised by residents.

Penketh Community Primary School is 550m north of the site and there are a further two primary schools within 2km of the site. The nearest secondary school is 2km to the east and accessible by bus, including dedicated school buses.

Other community facilities include the Recreation Ground to the south, Penketh Methodist Church which is 800m to the east and Latham Hall Scouts and Guides, 720m to the east of the site.

The site is a sustainably located development opportunity located within easy access of a range of local services, employment opportunities and public transport routes.



Type of Facility	Land Use	Name	Location	Distance
Retail	Foodstore	Sainsbury's	Great Sankey	3.6km
	Convenience	Co-op Food	Penketh	800m
		Spar	Penketh	1.6km
Education	Primary School	Penketh Community Primary School	Penketh	1.2km
		Penketh South Primary School	Penketh	1.4km
		Park Road Primary School	Great Sankey	2.5km
	Secondary School	Penketh High School	Penketh	2.2km
		Great Sankey High School	Great Sankey	3km
Health	Pharmacy	Lloyds Pharmacy	Penketh	1.6km
	GP	Penketh Health Centre	Penketh	1.6km
	Dentist	Mydentist	Penketh	1.1km
Employment	Business Park	Penketh Business Park	Penketh	3.1km
		Lingley Mere Business Park	Great Sankey	3km
	General Employment	Fiddlers Ferry Power Station	Widnes Rd	1.9km
		Warrington Town Centre	Warrington	5.6km
Leisure	Sport Facility	True Fit Golf Centre	Widnes Rd	1.1km
		Ramp1 Indoor Skatepark	Penketh	3km
	Community Facility	Penketh Library	Penketh	1.6km
	Leisure/Fitness Centre	Penketh Swimming Pool and Community Centre	Penketh	1.6km

Table: Key Facilities within the vicinity of the site



The development of the Stocks Lane site will support the local labour market, and will generate the following specific benefits:



#### Direct construction-related employment:

The proposed development could support around 155 full-time equivalent jobs per annum during the construction phase (circa 12 years), in a mix of direct construction opportunities and jobs supported in the wider supply chain.



#### Contribution of construction phase to economic output:

The construction of the new homes could contribute an additional £101m of gross value added (GVA) annually to the economy during the 12-year construction period.



#### Household spend:

Once fully built and occupied, the households are estimated to generate expenditure in the region of £16m per annum.



#### Increased Council Tax income:

The construction of the new homes could generate around £1.1 million per annum in additional Council Tax revenue, once fully developed and occupied.

## Economic Investment

The development of the site will contribute to building a strong, responsive and competitive economy. In particular, the development of up to 600 dwellings will secure a number of economic benefits in terms of job creation, tax revenues to the Council and increased expenditure in the local economy.

Housing supply can play a key role in the flexibility of the local labour market which is an important component in local economic competitiveness and maintaining a dynamic economy. This is because a shortage of housing or lack of affordability can act as a barrier to people accessing employment opportunities or result in long distance commuting and associated sustainability impacts.

## Community Benefits

The development of the site will also perform a social role by generating the following community benefits:

- Provide a range of open market housing comprising various types to meet the needs of the local community.
- Provide up to 180 affordable homes of a range and type to meet the identified need in the Warrington area.
- Provide over 12 Ha of public open space and outdoors sports provision for future residents and the wider community. The proposals for the site can deliver integrated open space that complements and strengthens links to the existing Recreation Areas to the south.
- Assist in the provision of other facilities where there is an identified need, in accordance with development plan policies.

### Taylor Wimpey in the Community

Taylor Wimpey is committed to making a difference in the local community and working with local educational establishments and job seeking agencies to facilitate local apprenticeships and training initiatives, and to ensure that employment generated from the development is sourced from and directly benefits the local area.



## Environmental Considerations

### Landscape & Visual Impact

As confirmed within the landscape analysis, the site is not subject to any formal landscape designations, other than its location in the Green Belt which is addressed in Chapter 3. The site lies adjacent to the western urban fringe of Warrington, within a character type referred to as 'Undulating Enclosed Farmland'. This landscape character type includes Penketh Brook with its 'narrow band of associated tree-lined banks' and farmland areas with an 'enclosed character'.

In terms of visual impacts, the site is generally well screened by existing field boundary trees and hedgerows and the elevated Liverpool-Manchester railway line, within an otherwise relatively flat landscape.

As such, it is not anticipated that the development of the site will have a significant impact on landscape character or visual amenity.

### Ecology and Trees

The site is not within or near to any designated ecological area, and as such is unlikely to have an adverse ecological impact.

The majority of trees and vegetation are found around the perimeter of the site, and between the large fields within the site. The vast majority of these will be retained and incorporated into the layout, whilst significant new planting will be proposed as part of the development, for biodiversity purposes as well as screening and landscaping.

Therefore, there are no ecological or arboricultural constraints preventing the development of the site and appropriate mitigation will be provided where necessary.

There are 3 Tree Preservation Orders (TPO's) around the perimeter of the site. These trees will be retained wherever possible and incorporated into the layout and landscaping plans.

### Archaeology & Heritage

There are no Conservation Areas or designated archaeological features either within or directly adjacent to the site. Brookside Farmhouse, towards the southern boundary of the site, is designated as a Grade II listed building. This is heavily screened by trees and is already flanked by existing residential development, which ensures that the development of the site will have minimal impact on its setting. There is also a Listed Milestone 380m to the east of the site, which will not be impacted by the proposed development.

A full archaeological assessment will be undertaken at planning application stage to identify if any mitigation measures are required, however at this stage there are no archaeological constraints that would prevent development of this site.

### Flooding & Drainage

Penketh Brook runs through the southern part of the site, with approximately 3 hectares of the surrounding land falling within Flood Zone 3. As such the masterplan does not include this land in the developable area and instead sets it aside for green infrastructure and drainage mitigation. This strategy will evolve in response to the findings of the Flood Risk Assessment and the technical studies.

The remainder of the site is located within Flood Zone 1 is therefore suitable for residential development.

### Noise

The main source of existing noise comes from the adjacent A5080 and the Liverpool to Warrington Railway line. Initial assessments suggest that the noise impacts of these two sources can be mitigated through strong development buffers to the northern and southern boundary, as reflected in the Illustrative Masterplan, and attenuation features such as bunds and tree cover. As such, there are no noise constraints preventing the development of the site.

### Ground Conditions

A desktop assessment suggests that the site has not been subject to intensive development, reflective of its use as agricultural pasture land; albeit there is some potential for contamination due to the existing railway line, and the neighbouring methane extraction site (150m west of the site) which will require further intrusive investigation at planning application stage, although this will not prevent development on the wider site.

### Agricultural Land Classification

The North-West Region Agricultural Land Classification indicates that the site falls within Grade 2 Agricultural Land, which is defined as 'very good' and considered best and most versatile. That said, the vast majority of Green Belt land around Warrington (to the north, west and part of the south) falls within this category, and given the need to release significant amounts of such land for development, this is not considered to be sufficient constraint to prevent development on this site.



### Highways

It is proposed that access to the site could be delivered via two new accesses onto the A5080 Farnworth Road, along the southern boundary of the site. Farnworth Road is a wide single carriageway, subject to a 30mph speed limit and provides frontage access to existing residential properties along its southern edge, within the vicinity of the proposed development site.

The two accesses will take the form of T-junctions, located to the west of the existing roundabout junction of the A5080 Farnworth Road with the A562 Warrington Road. Both junctions would accommodate right turn ghost-island lanes to provide segregated provision for vehicles turning into the site from the east, without impeding through traffic movements along the A5080.

As outlined earlier in this report, the larger area of residential development would be located to the north of the site, north of the current flood plain, with a smaller residential parcel located to the south of the site, adjacent to Farnworth Road. The northern development area will be served by the main access to the site, with a secondary access serving the smaller southern development area. However, both areas will include a series of looped road networks and will be connected by separate emergency vehicle access routes, as outlined below.

The eastern access will provide access to c.500 dwellings and will take the form of a wider access road of 6.75 metres width, consistent with the requirement for a Local Distributor Road, and will form the principal access into the site.

The western access will provide access to c.100 dwellings and will take the form of a Major Residential Road, a smaller scale access road of c.5.5 metres, suitable to accommodate the lower level of development provided in this southern parcel.

The indicative masterplan shows a series of connections between the major and minor access roads within the southern parcel of the site, with the major access road continuing northwards through the site into the larger northern development area. The masterplan also includes a series of looped roads within the development parcels, ensuring permeability across the site, and offering a choice of routes in case of emergencies.

The capacity of each access has been appraised and the assessments demonstrate that the proposed T-junction access arrangements would have sufficient capacity to accommodate up to c.600 dwellings on the site, taking account of current traffic volumes along Farnworth Road and an element of background traffic growth. The proposed right turn lanes would be of sufficient length to accommodate any forecast queuing vehicles at each access.

Two dedicated Emergency Vehicle Accesses (EVA) will also be provided within the site, which will also provide pedestrian/cycle connections between the parcels. One EVA will be provided from the A562 / A5080 roundabout at the south-eastern corner of the site, offering a separate link to the northern development parcel, in the event that the



major access road becomes blocked. This EVA route will also provide a shorter connection to the facilities and bus stops within Penketh for pedestrians / cyclists. A second EVA will be provided between the southern (c.100 dwellings) area of land and the northern (c.500 dwellings) area, towards the west of the site, again increasing the permeability of the site and offering a choice of routes between the parcels in the event that the main access route becomes blocked.

### Wider Highway Network

The A562 is a busy route providing access to local facilities near the site and to Warrington town centre to the east and Widnes town centre to the west. The A5080 Farnworth Road connects into the A562 at an existing five-arm roundabout to the south-east of the site, which provides onward connection to Warrington town centre, western areas of Warrington and the M62 motorway via the A57 Sankey Way / Liverpool Road and to Widnes to the south-west via the A562 Widnes Road.

The majority of the development-generated traffic will pass through this adjacent roundabout, en-route to key employment, education, retail, leisure and other destinations. An initial assessment of the capacity of the roundabout identifies that it would have sufficient capacity to accommodate the traffic associated with up to c.600 dwellings on the development site.

It is therefore concluded that the development can provide safe and suitable access to the site for all people. The impacts of the development can be accommodated within the surrounding network and there are no significant transport-related constraints that would affect the delivery of a sustainable residential community in this location.

### Utilities

An initial assessment of existing Utilities has confirmed that electricity, gas, water and telecommunications can be provided to the site without adversely impacting on the provision of services to the wider community.

## Sustainability Conclusions

**There is a compelling need to deliver the development needs of the Warrington Borough in an appropriate way. The future development of the site would deliver a range of sustainability benefits whilst creating no adverse local impacts. The development of this site is a wholly appropriate and sustainable outcome, which in itself delivers a wide range of local benefits, not least an increase in market and affordable housing. Moreover, the development will deliver significant inward investment from the private sector.**



# 7.0 Deliverability



## 7.0 Deliverability

**The site will make a valuable contribution with the delivery of up to 600 dwellings to meet the Borough's housing needs requirements as well as meeting the qualitative need to provide family and affordable housing within the area. It is therefore important that the site is deliverable in accordance with the requirements of the NPPF.**

### Deliverability Criteria

The NPPF and NPPG specify that local planning authorities supply sufficient specific deliverable sites to deliver housing in the first 5 years. As stated in Annex 2 of the NPPF, to be considerable deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. Paragraph 73 enforces local planning authorities to identify and update annually a supply of deliverable sites to provide a minimum of five years' supply of housing against their housing requirement.

To be considered deliverable, sites should, at the point of adoption of the relevant local development document:

- **Be available:** there is confidence that there are no legal or ownership problems.
- **Be suitable:** offer a suitable location for development and would contribute to the development of sustainable and mixed communities.
- **Be achievable:** there is a reasonable prospect that housing will be developed on the site at a particular point in time.

This is a judgement about the economic viability of a site and the capability of a developer to provide housing within a defined period, taking into account marketing, cost and deliverability factors.





## Available

Taylor Wimpey UK Ltd has legal control of the site, and is seeking to develop the site at the earliest opportunity. The site is therefore in the control of a major national housebuilder and could deliver up to 600 new homes that will be critical to meeting housing need during the Plan Period.

If the site were to be released from the Green Belt and allocated for housing, Taylor Wimpey would seek to develop the site immediately, which would contribute considerably to the Borough's 5-year housing land supply and deliver highly anticipated new homes early in the Plan Period. This commitment to delivery is demonstrated by Taylor Wimpey's track record of the efficient delivery of high quality greenfield housing schemes across the North West.

This is particularly relevant in Warrington, where the Council need to provide the additional dwellings required to support growth in the borough.



## Suitable

The site is suitable for housing development because it:

- Offers a suitable location for development and can be developed now;
- Would consolidate and round-off the settlement to the west of Penketh, making use of the existing physical boundaries of the Liverpool to Warrington Railway line and the A5080;
- Can utilise existing infrastructure surrounding the site with no utilities or drainage constraints preventing the site coming forward for development;
- Can accommodate satisfactory vehicular access, existing bus stops are in close proximity and the local highway can accommodate the provision of up to 600 additional dwellings;
- Will deliver generous areas of open space and parkland for use by residents and the local community;
- Is not subject to any ecological or environmental constraints preventing development on the site; and
- Is sustainably located with several local facilities within walking distance of the site boundary, including a primary school, shops, and recreation uses.

The site is therefore suitable in accordance with the NPPF.



## Achievable

The delivery of approximately 600 dwellings would make a significant contribution towards meeting the housing needs of the Borough. An assessment of the site constraints has been undertaken which illustrates that delivery of the entire site is achievable and deliverable, and a professional team of technical experts has been appointed to underpin this assessment and support the delivery of the site moving forward. Where any potential constraints are identified, Taylor Wimpey has considered the necessary mitigation measures and required investment in order to overcome any deliverability barriers.

Taylor Wimpey has reviewed the economic viability of the proposal in terms of the land value, attractiveness of the locality, potential market demand and the projected rate of sales in Warrington; as well as the cost factors associated with the site including preparation costs and site constraints. Where potential constraints have been identified; Taylor Wimpey has considered the necessary mitigation measures and will use investment in order to overcome any deliverability barriers.

Taylor Wimpey can, therefore, confirm that the development of the site is economically viable in accordance with the NPPF and NPPG. As a consequence, the company is committed to investing in the site and is confident that residential development can be achieved within 5 years.





# 8.0 Conclusions





## 8.0 Conclusions

**The Stocks Lane, Penketh site presents an exceptional opportunity to meet the future housing needs of Warrington in a location that would not undermine the purpose and function of the Green Belt. This Development Statement sets out the case for allocating the site for housing development within the emerging plan period, as well as the exceptional circumstances that support the alteration of the Green Belt in the Borough, a position the Council support.**

**The allocation of this site for residential development will deliver open market and affordable housing of a type, quantity and quality that will make a significant contribution to the future growth needs of Warrington.**

### Key Benefits

Accordingly, this Development Statement has demonstrated that the Stocks Lane site:

- Is entirely suitable, deliverable and viable for housing development; and will deliver a mix of housing types, including both market and affordable homes;
- Is sustainably located in proximity to a range of amenities, services and facilities;
- Is supported by clear exceptional circumstances for Green Belt release, including an urgent need for new market and affordable homes, and a shortage of available land within existing urban areas;
- Is entirely appropriate for Green Belt release and allocation as a residential development site, as it is well contained by existing physical features and forms a logical extension to the village, without compromising the core purposes of the Green Belt;
- Is not subject to any technical or environmental constraints that would prevent the delivery of housing;
- Can deliver a landscape led masterplan that complements the surrounding site context, and creates a high-quality housing development;
- Will provide a network of high quality open spaces;
- Will create a more appropriate and defensible Green Belt boundary to the west of Penketh; and
- Generates significant socio-economic benefits by providing housing choice, and stimulating job creation and economic investment. Increased consumer spending will also help to support additional shops and services within the Warrington Road Local Centre, which could elevate its role as a service centre.

### Summary

**The development of the site at Stocks Lane, Penketh provides a highly sustainable opportunity to support the national growth agenda and to assist in providing adequate land to deliver a new Local Plan for the Borough. The site will deliver the quantity, type and quality of homes that is required across the Borough and can demonstrate exceptional circumstances that support an alteration to the existing Green Belt without impacting on its core functions.**

**Taylor Wimpey is committed to working collaboratively with the Council and Key Stakeholders to ensure that the Borough's housing need is met in a sensitive and sustainable manner.**



# Appendices

**Appendix 1: Taylor Wimpey UK Limited**

**Appendix 2: Site Sustainability**



# Appendix 1:

## Taylor Wimpey UK Limited

**Taylor Wimpey UK Limited is a dedicated homebuilding company with over 126 years' experience, we have an unparalleled record in our industry. We aim to be the homebuilder of choice for our customers, our employees, our shareholders and for the communities in which we operate.**

We have expertise in land acquisition, home and community design, urban regeneration and the development of supporting infrastructure which improves our customers' quality of life and adds value to their homes. We draw on our experience as a provider of quality homes but update that, to the expectations of today's buyers and strive to provide the best quality homes, while setting new standards of customer care in the industry. Our 24 regional businesses in the UK give our operations significant scale and truly national geographic coverage.

Each business builds a range of products, from one bedroom apartments and starter homes to large detached family homes for every taste and budget and as a result, our property portfolio displays a surprising diversity. The core business of the company is the development for homes on the open market, although we are strongly committed to the provision of low cost social housing through predominantly partnerships with Local Authorities, Registered Social Landlords as well as a variety of Government bodies such as the Homes and Communities Agency.

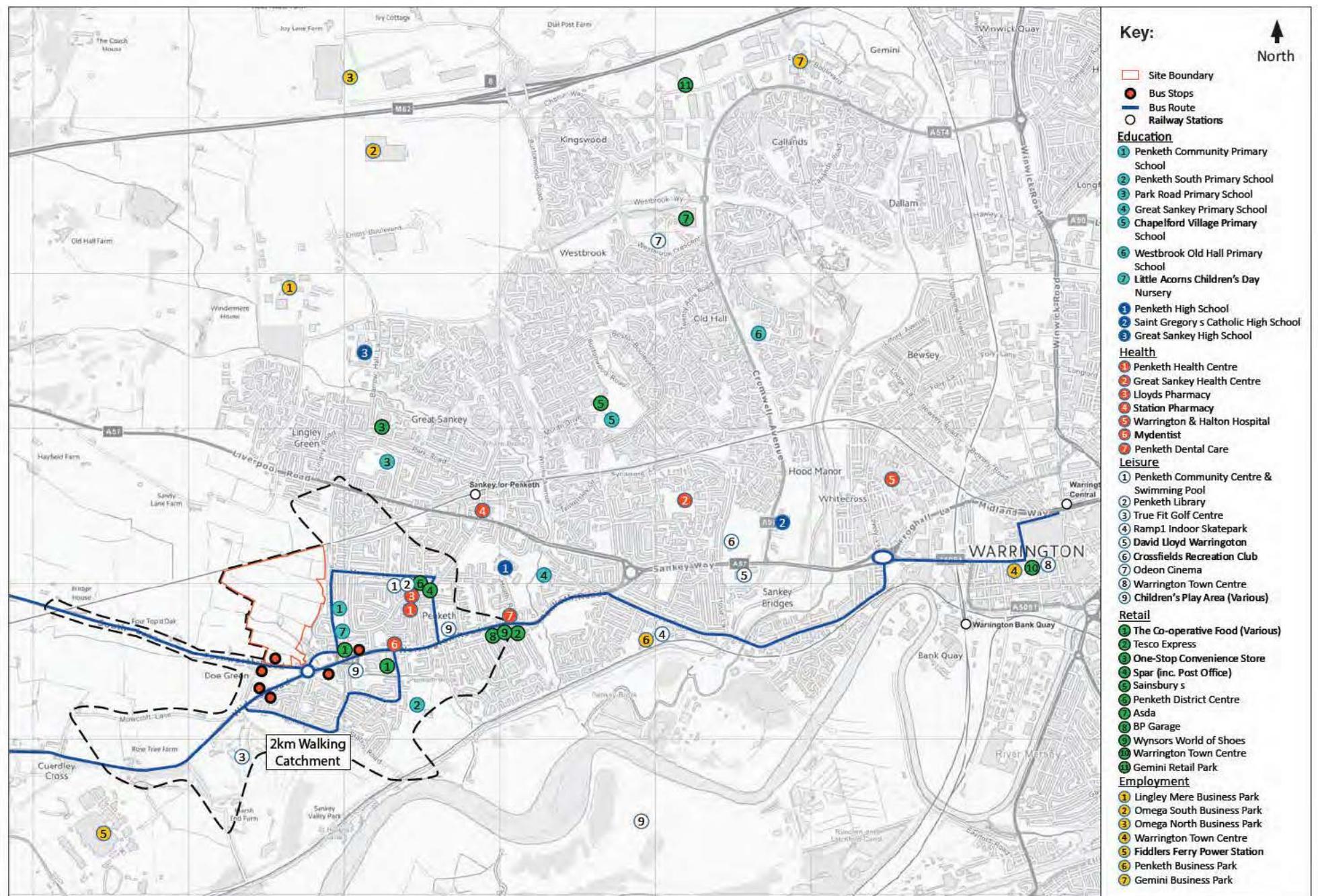
With unrivalled experience of building homes and communities Taylor Wimpey today continues to be a dedicated house building company and is at the forefront of the industry in build quality, design, health and safety, customer service and satisfaction. Taylor Wimpey is committed to creating and delivering value for our customers and shareholders alike. Taylor Wimpey combines the strengths of a national developer with the focus of small local business units. This creates a unique framework of local and national knowledge, supported by the financial strength and highest standards of corporate governance of a major plc.

Taylor Wimpey Strategic Land, a division of the UK business, is responsible for the promotion of future development opportunities, such as this site, through the planning system. The local business unit that will, in conjunction with Strategic Land, carry out housing and related development as part of this is Taylor Wimpey North West based in Warrington.

# Appendix 2: Site Sustainability

## Sustainability Plan

The Sustainability Plan illustrates the sustainability of the site and the location of key services in the vicinity of the site.



## Access to Education Facilities

Education facilities are shown in blue on the Sustainability Plan and described below:

There are two primary schools within a 2km walking distance of the centre of the site comprising: -

- Penketh Community Primary School (1.2km)
- Penketh South Primary School (1.4km)

Penketh secondary school is located approximately 2.3km from the centre of the site, additional high school are located in Great Sanky and Sankey Bridges.

There is one nursery schools within 2km of the site: -

- Little Acorns Children's Day Nursery (1km)

The Stocks Lane site is therefore well located in relation to education facilities and thereby accords with national planning guidance and the emerging LDF on the location of housing development.

## Access to Healthcare Facilities

Healthcare facilities in the vicinity of the site are shown in red on the Sustainability Plan and include one Health Centre within 2km comprising: -

- Penketh Health Centre (1.6km)
- Two dental practices are located within 2km of the site:-
- Mydentist (1.1km); and
- Penketh Dental Centre (2km).
- There is one pharmacy located within 2km of the site: -
- Lloyds Pharmacy (1.6km).

Additionally, the closest hospital to the site is Warrington and Halton Hospital (5.1km). The Stocks Lane site is therefore well located in relation to healthcare facilities and thereby accords with national planning guidance and the emerging Local Plan on the location of housing development.

## Access to Retail Facilities

The site is located approximately 1.6km from Penketh District Centre which provides a wide range of services and facilities, meeting local shopping and employment requirements for the site. The below listed retail facilities are indicated in Green on the Sustainability Plan.

Neighbourhood convenience stores in the vicinity of the site include: -

- Co-op Food on Farnworth Road (800m) and Warrington Road (1km).
- Spar including Post Office (1.6km)

One supermarket within 2km of the site: -

- Tesco Express Supermarket (2km)
- Two larger food stores are located at Sainsbury's in Great Sankey and ASDA at Westbrook.
- As outlined above Penketh Post Office is located approximately 1.7km from the site within Penketh District Centre.

The Stocks Lane site is therefore well located in relation to local shops and services and thereby accords with national planning guidance and the emerging LDF on the location of housing development.

## Access to Sports and Recreation Facilities

Sports and recreation facilities are shown in white on the Sustainability Plan. The site is in close proximity to the following key sports and recreation sites: -

- True Fit Golf Centre (1.1km);
- Penketh Swimming Pool and Community Centre (1.6km)
- Two Children's Play areas on Warrington Road (900m and 1.5km)

The Stocks Lane site is therefore well located in relation to sports and recreation facilities and thereby accords with national planning guidance and the emerging LDF on the location of housing development.

## Access to Community Facilities

The community facilities listed below are also shown in white on the Sustainability Plan. The nearest Community facilities include: -

- Penketh Library (1.6km).
- Penketh Swimming Pool and Community Centre (1.6km)

The site is located in close proximity to a number of public houses (not shown on the Sustainability Plan): -

- The Crown and Cushion (750m);
- Sportmans Arms (1.2km)
- The Red Lion (1.2km)

The site is within 2 km of approximately three places of worship (not shown on the Sustainability Plan), consisting of: -

- St Paul's Church of England Church (850m)
- Penketh Methodist Church (1.3km)
- St Joseph's Roman Catholic Church (1.6km)

Additional restaurants and public houses are located within Warrington Town Centre approximately 5km from the site.

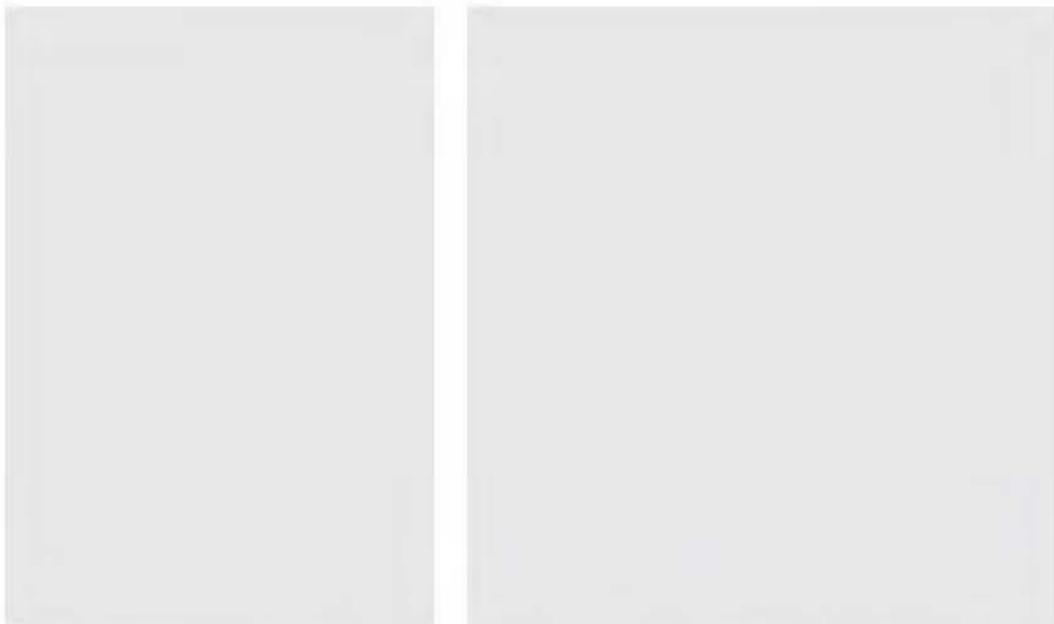
The Stocks Lane site is therefore well located in relation to library and community services and thereby accords with national planning guidance and the emerging LDF on the location of housing development.

**Taylor**  
**Wimpey**

# **Stocks Lane** **Penketh**

Published by Taylor Wimpey UK Limited

# Stocks Lane Penketh



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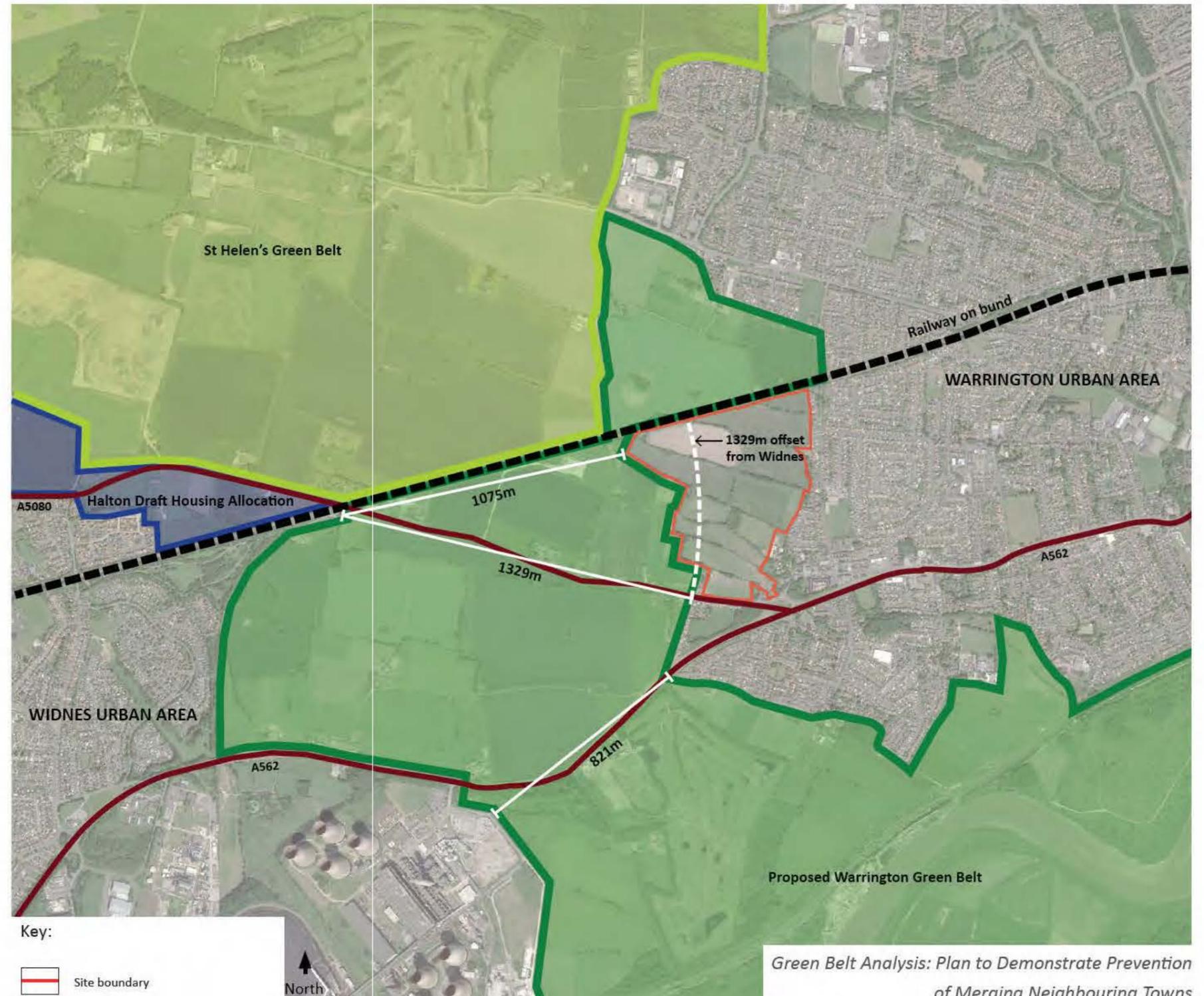
## Introduction

- 1.1. This Landscape Note highlights and summaries the key points relating to the suitability of the Stocks Lane, Penketh site for release from the Green Belt for in order to be allocated for residential development, in accordance with the submitted Illustrative Masterplan. The Note discusses the site in response to the following key issues raised by the Council:
- Coalescence between Warrington and Widnes.
  - General landscape issues.

## Coalescence between Warrington and Widnes

### Physical coalescence

- 1.2. The existing minimum width of the Green Belt separating Warrington and Widnes is 821m along the A562.
- 1.3. The existing distance between Widnes and Warrington in the vicinity of the site, along the A5080, is 1329m. Removal of the site from the Green Belt would marginally reduce the width of the Green Belt in this location to a minimum of 1075m, which also takes into account the draft allocation [W11] in the Halton draft Local Plan.
- 1.4. The proposed release of the site from the Green Belt would not result in physical coalescence between Warrington and Widnes.

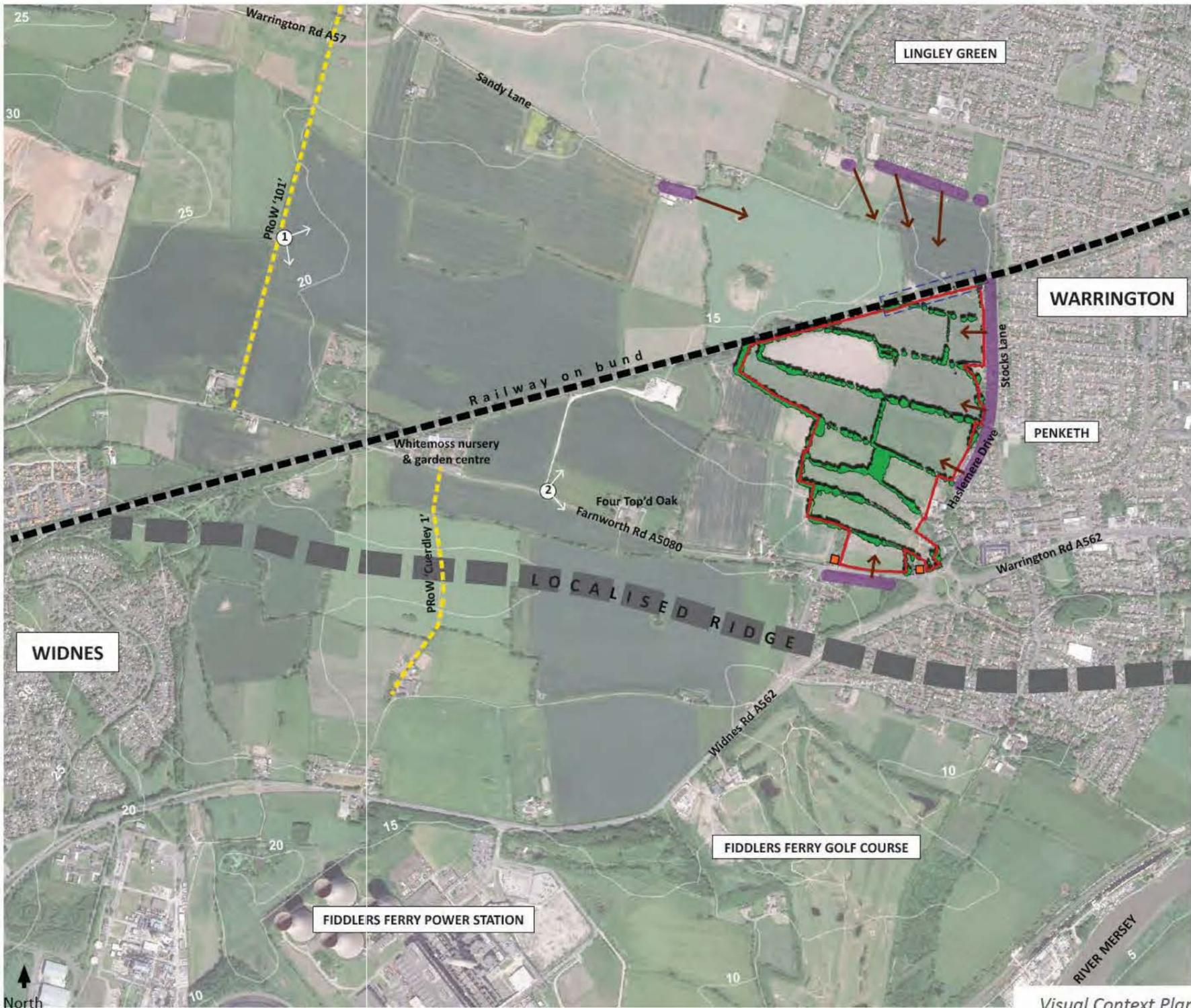


**Perceived coalescence**

- 1.5. The site has strong vegetated boundaries, particularly along the western site boundary. This makes the site well contained with a defensible green edge, that would soften the existing urban edge to Penketh.
- 1.6. The visual containment caused by the elevated railway to the north and west of the site, within an otherwise relatively flat landscape, limits the potential visibility of the site or the site boundary, to a short section of the A5080; rail users travelling on the railway line within close proximity of the site; and to existing residential areas in the immediate vicinity of the site. The potential visibility of the site is further reduced by existing field boundary trees and hedgerows which generally screen the site from view.
- 1.7. The limited visibility of the site from the wider landscape and the lack of any visual relationship between the site and Widnes will ensure that development of the site would not result in any perceived coalescence between Warrington and Widnes.

**Key:**

- Site boundary
- Public Right of Way (PRoW)
- Railway on bund restricts views
- Area of decreased bund height
- Ridgeline of higher ground prevents long distance views from the south
- Residential area with views of site
- Partial views to site
- Residential properties framing the site
- 5m Contours with annotation
- Vegetation within the site
- Viewpoint location



Visual Context Plan



**Viewpoint 1 - View towards the west of the site from South Lane Entry PROW 101**



**Viewpoint 2 - View towards the west of the site from Farnworth Rd**

## General landscape issues

### Landscape character

- 1.8. The Development Statement demonstrates that the site:
- is not representative of the 'Penketh and Cuerdley' landscape character area;
  - amounts to urban fringe, with a currently negative frontage created by existing properties backing onto the eastern site boundary;
  - has a small field pattern with a strong network of trees and hedgerows, that contribute to the character of the site and its limited visibility in the wider landscape.
- 1.9. Development of the site would not result in significant adverse effects on the landscape setting of the site.

### Visual context

- 1.10. The Development Statement demonstrates that the site has generally limited visibility in the wider landscape due to the relatively flat nature of the land and the existing vegetation within the site, at site boundaries and in the wider landscape.
- 1.11. Development of the site would not result in significant adverse effects upon local views.





**Photo A** - View from within the site looking north towards the elevated railway line



**Photo B** - View from the centre of the site looking north across the site

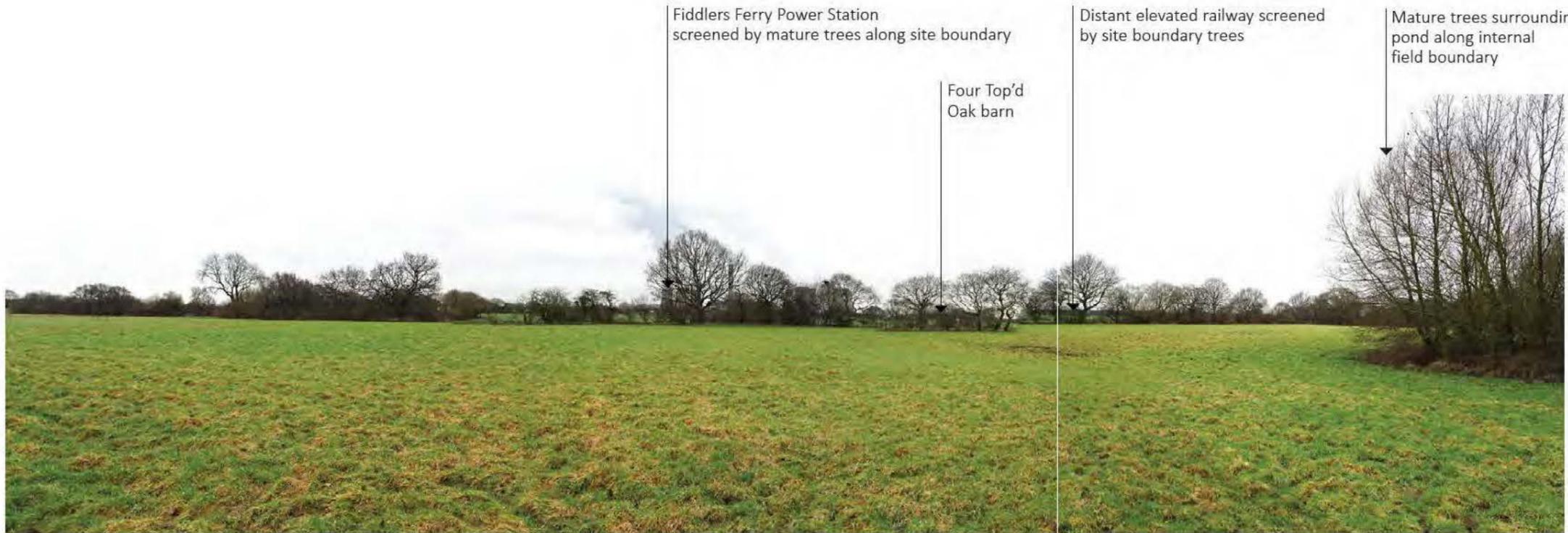
# Stocks Lane, Penketh



Photo C - View from within the site looking south east towards housing on Haslemere Drive which backs onto the site



Photo D - View from within the site looking south towards Farnworth Rd



**Photo E** - View from within the site looking south west towards Widnes



**Photo F** - View from within the site looking north west towards the north west boundary

# Stocks Lane, Penketh



Photo G - View from Farnworth Rd looking north across the site

### Masterplan objectives

1.12. The landscape-led masterplan proposals for the site will:

- retain and enhance the site's existing character;
- create a strong new and defensible Green Belt boundary;
- retain and enhance the majority of trees and hedgerows within the site;
- result in no significant adverse effects on landscape features or landscape character;
- achieve many of the management objectives of the 'Penketh and Cuerdley' landscape character area;
- protect existing residential amenity;
- improve the urban edge of the settlement;
- provide a gateway for users of the A5080 and railway entering Warrington from the west.

1.13. There is potential on the Stocks Lane site to develop a high quality residential scheme with a coherent landscape structure which conserves the natural assets present on the site. Development in accordance with the Illustrative Masterplan will avoid adverse effects on landscape character, landscape features or views.

### Masterplan detail

1.14. The high quality residential scheme proposed will deliver the following key features:

- Up to 565 dwellings, based on an assumed 30 to 35 dwellings per hectare;
- Approximately 12 hectares of accessible, safe and multi-functional greenspace, providing recreational and environmental benefits;
- Extensive new footpaths and cycleways encouraging sustainable transport and informal recreation.

<b>Key:</b>	 Site boundary	 Proposed footpaths
 Existing buildings	 Pedestrian route and emergency vehicle access	 Proposed primary road
 Existing vegetation	 Proposed secondary road	 Proposed private drive
 Proposed vegetation	 Development parcels	 Proposed mews courtyard
 Proposed greenspace		
 Existing waterbodies		
 Proposed waterbodies/wetland		



Illustrative Masterplan



### Conclusion

- 1.15. The release of the site from the Green Belt and its allocation for residential development, in accordance with the submitted Illustrative Masterplan, would not contribute to neither physical nor perceived coalescence between Widnes and Warrington, nor would it present any landscape or visual issues, as explained in the submitted Development Statement and demonstrated within this Landscape Note.
- 1.16. There is no landscape reason to prohibit land at Stocks Lane, Penketh from being released from the Green Belt, to become a sustainable and suitable site for residential allocation.

Key:  
Site boundary



Prepared for:

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# **COMMENTS ON WARRINGTON LOCAL PLAN VIABILITY ASSESSMENT**

June 2019

PREPARED ON BEHALF OF

**Taylor Wimpey UK Ltd**

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Stannybrook Property Consultants

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# 1. INTRODUCTION

## **Purpose of Report**

- 1.1 Taylor Wimpey UK Ltd (TW) have commissioned Stannybrook Property Consultants Ltd (SPC) to comment on Warrington Borough Council's Local Plan Viability Assessment, prepared by BNP Paribas Real Estate (BNPRE) and published as part of the preparation of the draft Warrington Local Plan.
- 1.2 The purpose of this report is to provide an objective view of the BNPRE assessment and consider the inputs and conclusions in the context of two local development sites under the control of TW, those sites being:
  - Land west of Stocks Lane, Penketh (Call for Sites Reference: R18/138); and
  - Reddish Hall Farm and Howshoots Farm, Grappenhall (Call for Sites Reference: R18/142, and various other parcels which form part of the proposed Warrington Garden City Suburb).
- 1.3 This note concentrates on the sections of the BNPRE report that relate to the residential development market only, it does not comment on commercial uses.
- 1.4 In preparing the note other documents have also been considered and referred to where appropriate including the Authority's Preferred Development Option Regulation 18 Consultation and Spatial Options Assessment (July 2017), Viability Testing Local Plans, the RICS Guidance Note: Financial Viability in Planning and the viability provisions set out in the revised NPPF/PPG.
- 1.5 SPC previously issued comments in July 2018 on Warrington Borough Council's Local Plan Viability Testing – Appraisal Inputs document, prepared by BNP Paribas Real Estate (BNPRE) and published as part of the preparation of the draft Warrington Local Plan, this report follows a similar format and makes reference to the previous July 2018 comments where appropriate.

## **Stannybrook Property Consultants**

- 1.6 Stannybrook Property Consultants are a multi-disciplinary firm of Chartered Surveyors providing professional property advice and services to a diverse range of clients across both private and public sectors.
- 1.7 This report has been prepared by Akeel Shafiq, an RICS Registered Valuer and Director of Stannybrook Property Consultants Ltd. Akeel has a First Class Honours Degree in Property Management and Investment and is a Member of the Royal Institution of Chartered Surveyors with 14 years post qualification experience.
- 1.8 Akeel has both public and private sector development experience. He has previously worked as a Development Surveyor for the Real Land Group, a specialist commercial development company based in London and Maple Grove, the development arm of the Eric Wright Group. Akeel was also employed at Oldham MBC in the Regeneration Department where he was responsible for the delivery of a wide range of regeneration and development projects.

- 1.9 Developments of note that he has managed include; two office buildings totaling 45,000 ft<sup>2</sup> at Parkland Square, 750 Capability Green, Luton; Coventry Innovation Village – a development in partnership with Coventry University Enterprises Ltd of 10 stand-alone office buildings aimed at knowledge based industries and the redevelopment of Failsworth District Centre. Akeel has also worked closely with the Planning Department at Oldham MBC where he advised on new LDF policies and assessed the viability of Planning Applications for S106 and change of use purposes.
- 1.10 With almost 20 years of direct Development and Regeneration experience Akeel advises clients across all aspects of the Development and Regeneration process. Current consultancy commissions range from providing advice on viability to full development management of residential and mixed use projects. Akeel has assessed, negotiated and agreed S106 contributions for numerous development schemes across the country.

## 2. BNPRESSESMENT AND SPC COMMENTS

### Sales Values

2.1 BNPRES set out that *'We have drawn upon Land Registry sold price data across the Borough for units sold between May 2016 and August 2018, the latest available data... We have received advice from Cushman & Wakefield who are advising the Council on the delivery of the Garden Suburb allocation. Cushman & Wakefield have advised that they would anticipate new build developments achieving a sales value of £2,799 per square metre in the Garden Suburb and South West Extension'*.

2.2 BNPRES have increased the revenues previously adopted in July 2018. SPC previously commented in July 2018 that:

*'Whilst Warrington has experienced increasing house prices over the previous years it should be noted that there has been a significant recent softening of the wider residential market due to a number of factors including the current economic uncertainty. Sales Values in themselves may remain stable for the time being however sales volumes and time taken to sell properties have suffered. The latest RICS UK Residential Market Survey (June 2018) sets out a subdued picture stating that:*

*Significantly, the Newly Agreed Sales net balance reading of -7% was the sixteenth successive month in which this metric produced a negative result. This series has a good record as a lead indicator (by around two quarters) of HMRC and Land Registry transactions data and suggests that the modestly softer trend in sales volumes compared with last year (around three per cent lower) will persist over the coming months. Indeed, to the extent that the New Buyer Enquiries series provides a gauge as to the appetite from potential purchasers to acquire property (this series is well correlated with data on mortgage approvals), there is little reason to expect any uplift in sales volumes during the second half of the year. Consistent with this generally uninspiring picture is the rise in time it is taking to complete a property sale from initial listing. This has edged up on the RICS measure from around sixteen weeks in the spring of last year to around eighteen weeks on average at present.*

We consider that some of the revenues adopted are optimistic however given the uncertainty in the current market, further comments regarding appropriate revenues will be made at the point that the site specific assessments are undertaken'.

2.3 It is SPC's view that uncertainty regarding revenues remains as evidenced by the Land Registry House Price Index (All Property Types) for Warrington which stood at 120.57 in July 2018 but which is currently at 119.55 (latest data available is for March 2019) showing a stagnant if not receding market. This is further illustrated by the April 2019 RICS UK Residential Market Survey which states that *'The April 2019 RICS UK Residential Survey results point to overall market trends remaining very similar to those reported in recent months, with headline indicators on demand, supply and prices all still stuck in negative territory. Brexit uncertainty and a lack of available stock to purchase remain the key constraints, meaning little change in momentum is anticipated in the near term'*.

- 2.4 We have previously stated that we consider some of the revenues adopted by BNPRE to be optimistic. In addition to the optimistic revenues, BNPRE set out at 4.2.15 of their report that they have adopted an annual sales growth rate of 5%. Whilst we note that BNPRE advise that the indexation should be viewed with a degree of caution, the annual increase in revenues is not in keeping with market conditions and has the potential of projecting revenues that are already optimistic to a level which is unachievable.

### **Affordable Housing Receipts**

- 2.5 In July 2018, SPC commented as follows:

The modelling work carried out by BNPRE indicates that average affordable housing values should be as follows:

- Social rented housing: £1,385 per square metre;
- Shared ownership housing: £1,855 per square metre.

When compared to the open market sale values suggested by BNPRE, the affordable housing values adopted equate to:

- Social rented housing: 50% to 64% of Open Market Value;
- Shared ownership housing: 67% to 86% of Open Market Value.

SPC's experience suggests that the values adopted by BNPRE are significantly higher than recent affordable housing values which, unless specific policy/agreement states otherwise, are usually in the region of:

- Social rented housing: 35% to 40% of Open Market Value;
- Shared ownership housing: 65% to 70% of Open Market Value.

SPC note that the BNPRE have increased the affordable housing revenues within their assessment to:

- Social rented housing: £1,449 per square metre;
- Shared ownership housing: £1,959 per square metre.

- 2.6 This represents an increase in revenues to those originally adopted and, as with the Open Market Sale revenues, has the potential of projecting revenues which are already optimistic to a level which is unachievable.

### **Build Costs**

- 2.7 BNPRE state that '*We have considered build costs from the RICS Building Cost Information Service (BCIS), which is based on tenders for actual schemes... This is a standard approach for viability studies for planning policy testing and is an approach identified by the PPG (paragraph 012 Reference ID 10-012-20180724)... We have also taken account of the advice of Cushman & Wakefield who are advising the Council on the Garden Suburb. They advise that the BCIS costs exceed normal market build costs for large schemes (i.e. above 250 units) at the £2,500 - £2,800 per square metre price point. Their advice is that costs should be reduced to £1,030 per square metre, which is broadly reflective of lower quartile BCIS costs. For smaller sites (fewer than 250 units), we have applied a higher cost of £1,172 per square metre for houses. For flatted schemes we have applied a cost of £1,172 per square metre, based on lower quartile BCIS costs*'.

2.8 The following observations previously made by SPC still remain relevant:

- The costs adopted by BNPRE are at the lower quartile – it is not clear how this will reflect schemes delivered across the borough especially where they are delivered by smaller developers or to a higher specification.
- There does not seem to be any allowance for the construction cost of separate garages which are not accounted for in the GIA.
- The costs adopted do not seem to make allowance for significant recent and ongoing increases in construction costs which are evidenced by the BCIS Indices (All in TPI etc.).
- The current economic uncertainty and market conditions continue to put pressure on availability of both labour and materials which will only exacerbate construction costs issues.

2.9 We welcome the inclusion of a further allowance to cover external works which had previously been omitted.

### **Contingency**

2.10 As per the July 2018 report, BNPRE have applied a developer's contingency of 5% to the construction costs above. It should be noted that the contingency allowance should apply to all costs and not just standard construction costs.

### **On-Site infrastructure and utilities costs**

2.11 BNPRE explain that:

*On greenfield sites, developers will incur costs for on-site infrastructure (e.g. estate highway works, sustainable urban drainage) and utilities. The cost applied to each site reflects our experience from major sites elsewhere. The Council has provided additional infrastructure costs for the four strategic allocations. These primarily relate to the additional highways and other strategic infrastructure required to deliver these sites. The costs were provided by external, independent sources and, where possible, the costs have been derived in discussion with landowners and developers promoting sites within these proposed allocations.*

2.12 SPC comment as follows:

- The allowances that have been made for on-site infrastructure of £7,966 per dwelling seem to be reasonable if they specifically exclude any other abnormal costs e.g. pumping stations, significant utility diversions or highway works. However, it is important to note that they do not allow for additional abnormal costs which we will comment upon in further sections of the report. There will be sites where significant abnormal costs are incurred, SPC consider the cost allowance to be too conservative in such cases.
- SPC note the allowance of further costs towards strategic infrastructure and highways however it is impossible to comment on the appropriateness of the allowances with any certainty as the actual requirements are an unknown at the current time.
- We do not believe that the profiling of the infrastructure costs is accurate in the summary appraisals which we will comment on further on in the report.

## **Fees**

- 2.13 BNPRE advise that *'In addition to base build costs, schemes will incur professional fees, covering design, valuation, highways consultants and so on. Our appraisals incorporate a 6% allowance, which is reflective of the costs incurred on major developments with standard housetypes'*.
- 2.14 As previously stated in July 2018, whilst the allowance falls within an acceptable range for standard development typologies SPC do not consider that this is appropriate for larger schemes where significant investment in infrastructure will be needed and which usually requires a larger fee allowance given the scale and extent of the input and services that the developer will need to procure.

## **Development and Sales Periods**

- 2.15 BNPRE state that *'Development and sales periods vary between type of scheme. However, our sales periods are based on an assumption of a sales rate of between 10 and 16 units per month, reflecting multiple sales outlets on the larger sites'*.

Based on SPC's experience of the local and regional market we believe the sales rates that have been adopted are overly optimistic. Sales rates tend to be circa 3 to 4 units per month on average, any increase on this will only result in increased marketing and sales costs and create significant risk for the developments.

## **Developer's Return**

- 2.16 BNPRE, in July 2018, explained that:

*In viability assessments for live developments in the Borough, applicants have applied a profit of 17.5% of GDV for the private housing element of their developments and 6% to 7% of cost for the affordable housing element. We propose to apply the same levels of return in our appraisals as they reflect local circumstances.*

- 2.17 SPC commented at the time that we do not consider the profit allowance that has been made by BNPRE to be sufficient or reflective of the current market and considered that a Profit on GDV of 20% should be the minimum return adopted for new build housing. We also commented that the reduced return for affordable housing is only appropriate *'...in circumstances where this guarantees an end sale at a known value and reduces the risk'* which will not always be the case and needs to be factored in to any assessment.
- 2.18 The current BNPRE report adopts a lower return explaining that *'Our appraisals assume a profit of 17%, which is within the current range and towards the middle of the range of 15% to 20% indicated in the NPPG... Our assumed return on the affordable housing GDV is 6%. A lower return on the affordable housing is appropriate as there is very limited sales risk on these units for the developer; there is often a pre-sale of the units to an RP prior to commencement'*.
- 2.19 SPC would like to comment that a 17% return on GDV for open market sale housing is not an appropriate input for the purposes of the area wide assessment.
- 2.20 Based on our experience, most housebuilders are required to generate return that are higher than 20% on GDV. Information regarding current gross and operating margins for national housebuilders and developers can be gleaned from annual accounts which show that current margins are consistently at circa 20% on GDV (if not higher).

2.21 It is also important to note current market/economy risks which include:

- Current uncertainty around Brexit
- High build cost inflation
- Pressure on labour and material costs
- Significant uncertainty regarding future of ground rents
- The number of competing developments in the wider area

2.22 A significant proportion of the schemes that will be delivered are large, high risk developments for which a return of 17% on GDV would be insufficient. BNPRE need to take into account both the market risks and characteristics of these scheme when arriving at the benchmark profit return. SPC remain of the view that a return of 20% on GDV is a reasonable and appropriate return for the open market sale housing.

2.23 We also reiterate our previous comments that the reduced return for affordable housing is only appropriate '*...in circumstances where this guarantees an end sale at a known value and reduces the risk*' which will not always be the case and needs to be factored in to any assessment.

### **Indexation**

2.24 BNPRE have adopted an annual increase of:

- Sales Values – 5%
- Build Costs – 2%

2.25 In terms of sale values, SPC have already explained the significant uncertainty regarding revenues remains as evidenced by the Land Registry House Price Index (All Property Types) for Warrington which stood at 120.57 in July 2018 but which is currently at 119.55 (latest data available is for March 2019) showing a stagnant if not receding market. This is further illustrated by the April 2019 RICS UK Residential Market Survey which states that '*The April 2019 RICS UK Residential Survey results point to overall market trends remaining very similar to those reported in recent months, with headline indicators on demand, supply and prices all still stuck in negative territory. Brexit uncertainty and a lack of available stock to purchase remain the key constraints, meaning little change in momentum is anticipated in the near term*'. Whilst we note that BNPRE advise that the indexation should be viewed with a degree of caution the annual increase in revenues is not in keeping with market conditions and has the potential of projecting revenues which are already optimistic to a level which is unachievable.

2.26 This is similarly the case with Build Costs. The BCIS All-in TPI Indices shows the following changes in the index (i.e. changes in construction costs):

- Q3 2015: 269
- Q3 2016: 273 Increase on year of 1.49%
- Q3 2017: 308 Increase on year of 12.82%
- Q3 2018: 323 Increase on year of 4.87%

2.27 It is evident that the cost increase allowance of only 2% per annum is insufficient.

## Exceptional Costs

- 2.28 BNPRE state that *'Exceptional costs can be an issue for development viability on previously developed land. Exceptional costs relate to works that are 'atypical', such as remediation of sites in former industrial use and that are over and above standard build costs. However, in the absence of detailed site investigations, it is not possible to provide a reliable estimate of what exceptional costs might be. Most of the land to be developed is either mostly or wholly in existing use as agricultural land, with limited likelihood of contamination of similar issues to be addressed by developers'*. On this basis no allowance has been made for abnormal costs over and above the Infrastructure costs previously referred to.
- 2.29 SPC believe that the assumption adopted is fundamentally flawed. In our experience, even greenfield sites will incur abnormal costs relating to items such as:
- Abnormal Foundations
  - Cut and Fill Requirements
  - Retaining Structures
  - Ecology
  - Abnormal Ground conditions e.g. requirement for grouting
- 2.30 We do not believe that sufficient allowance has been made to cover these abnormal items.

## Site Value

- 2.31 The BNPRE Report states that *'In response to the evidence submitted during the consultation, we have increased the benchmark land values and for testing purposes, we have adopted two benchmarks reflecting both the upper end of the range (£371,000 per gross hectare) and the lower end of the range (£250,000 per gross hectare), the latter reflecting the large, strategic nature of the sites (which typically have lower land values due to long build out periods and heavy infrastructure requirements)'*.
- 2.32 SPC previously commented that we are of the view that the value of greenfield land that has been adopted is significantly low and inappropriate. Further comments are set out below:
- BNPRE have adopted a value based on 11 to 17 times the existing use value (their assessment) to provide the landowner with an uplift. Without any further information we consider this to be an arbitrary uplift which is not in keeping with the relevant guidance or workings of the market. It is important to note that both historic guidance and the recent PPG set out the requirement for the benchmark land value to be set in the context of the market.
  - The BNPRE allowance is significantly lower than the benchmark land values adopted by other local authorities as part of their own area wide CIL assessments.
  - Land is usually released for residential redevelopment based on a value per net acre. BNPRE have adopted a value per gross acre which does not allow an accurate assessment or comparison of value.
- 2.33 Viability Testing Local Plans guidance states that *'In setting out a Threshold Land Value, it is important to avoid assuming that land will come forward at the margins of viability. To guard against this, planning authorities should consider incorporating an appropriate 'viability cushion' in the testing in order to ensure that the sites upon which the Local Plan relies in the first five years will, on the balance of probability, come forward as required'*.

- 2.34 Regarding the methodology of using a premium over current use values and credible alternative use values, the Viability Testing Local Plans guidance goes on to state that *'It is widely recognised that this approach can be less straight forward for nonurban sites or urban extensions, where land owners are rarely forced or distressed sellers, and generally take a much longer term view over the merits or otherwise of disposing of their asset. This is particularly the case in relation to large greenfield sites where a prospective seller is potentially making a once in a lifetime decision over whether to sell an asset that may have been in the family, trust or institution's ownership for many generations. Accordingly, the uplift to current use value sought by the landowner will invariably be significantly higher than in an urban context and requires very careful consideration. Therefore, for sites of this nature, it will be necessary to make greater use of benchmarks, taking account of local partner views on market data and information on typical minimum price provisions used within developer/site promoter agreements for sites of this nature. If such benchmarks are disregarded, there is an increasing risk that land will not be released and the assumptions upon which a plan is based may not be found sound. Furthermore, if local market evidence is that minimum price provisions are substantially in excess of the initial benchmark assumptions, then the plan will be at significant risk unless Threshold Land Values are placed at a higher level, reflecting that market evidence'*.
- 2.35 It is therefore clear that for nonurban and rural sites i.e. the greenfield sites, market evidence is of fundamental importance. SPC believe that the values adopted are significantly below the market levels and therefore there is a real risk that land will not be released for development as the threshold land values adopted are significantly out of line with market data.

#### **Development Appraisals**

- 2.36 SPC previously commented that the appraisal structures seem overly simplistic, especially for the larger schemes. Whilst no further information has been provided which would allow us to form a more informed view we have considered the summary appraisals set out in Appendix 5 of the BNPRE report which reinforce our initial opinion. As an example, the Garden Suburb appraisals seem to have been separated into parcels of 250 units which is not the basis on which the scheme will be brought forward. More importantly, infrastructure costs seem to have been spread across the entire development on a pro-rata basis which is not what will happen in reality – it is usual for large schemes to incur significant infrastructure costs up-front which will then have a subsequent impact on interest costs, profitability etc. The current format of appraisals does not seem to reflect this practicality.

### **3. CONCLUSIONS**

- 3.1 The comments contained within this report are a critical assessment of Warrington Borough Council's Local Plan Viability Assessment and associated evidence.
- 3.2 The analysis that has been carried out identifies a number of areas of concern where it is felt that inappropriate or sufficient allowances have not been made. Specific areas of concern include (but not limited to):
- Open Market Sale and Affordable Housing Revenues which seem to be optimistic.
  - Insufficient allowance of costs to cover abnormal works and fees for larger schemes
  - Indexation of revenues and costs which is not in keeping with the current market.
  - Allowance of a Developer's Return that is insufficient and not in keeping with current market returns or guidance.
  - Benchmark Land Value for greenfield sites that is insufficient and not in keeping with the current market or guidance. Limited detail and rationale regarding net to gross site areas.
  - The structure of the appraisals contained within Appendix 5 of the Assessment report which may contain some errors but are also overly simplistic especially with regards to the larger schemes.
- 3.3 Given the current and ongoing changes in the residential development market we concur with BNPRE that the viability analysis, especially for the strategic sites, needs to be developed further by the Authority at the point where the schemes come forward for development including revisiting all the inputs that have been referred to above.

#### **4. DISCLAIMER**

- 4.1 This report does not constitute a valuation, in accordance with the appropriate sections of the Valuation Standards (“VS”) and United Kingdom (“UKVS”) contained within the RICS Valuation – Professional Standards 2014 (the “Red Book”).
- 4.2 This report is addressed to Taylor Wimpey UK Ltd only and should not be reproduced without the prior consent of Stannybrook Property Consultants Ltd.