

Our Ref:  
Your Ref:

6 June 2019

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

**By email to: [localplan@warrington.gov.uk](mailto:localplan@warrington.gov.uk)**

Dear Sir / Madam,

**Proposed Submission Version Local Plan Consultation: Representations on behalf of Caddick Group**

On behalf of Caddick Group ("our clients"), thank you for the opportunity to submit representations to the Proposed Submission Version of the Local Plan (March 2019) for Warrington ("Draft Local Plan").

These representations have been prepared by Avison Young (formerly GVA HOW Planning) and are submitted in relation to Land at Cherry Hall Farm, Cherry Lane, Lymm, WA13 0SY, as shown edged red on the appended plan. They should be read in conjunction with previous submissions made on behalf of High Legh Estate.

Since the Preferred Development Options stage, Warrington Borough Council (WBC) has prepared several evidence base studies to demonstrate that the emerging Local Plan is based on the most up to date assessment of Warrington's development needs and that all options for meeting these needs have been appropriately considered. Accordingly, these representations provide comments on specific policies contained within the emerging Local Plan and set out the deliverability of the Land at Cherry Hall Farm and the case for its removal from the Green Belt. We respectfully request that these representations are considered in the preparation of the final version of the Local Plan.

**Meeting Employment Needs**

Caddick Group agrees that Warrington has the potential to attract new businesses due to its central location within the North West region, its excellent transport links and highly skilled workforce. Therefore, it is crucial that an ambitious growth rate is targeted, which is supported by a sufficient number of employment development sites.

Caddick Group generally agrees with emerging **Policy DEV4 (Economic Growth and Development)** and the focus on providing 362 hectares of land for a diverse range of employment sites and premises. Our client

Norfolk House  
7 Norfolk Street  
Manchester  
M2 1DW

T: +44 (0)8449 02 03 04  
F: +44 (0)161 956 4009

**[avisonyoung.co.uk](http://avisonyoung.co.uk)**

also agrees that the removal of Green Belt land will be required to ensure strong and sustainable economic growth.

Caddick Group is also supportive of the flexibility provided within the policy which supports B1, B2, B8 and sui generis employment uses on allocated employment sites, as well for other uses where there is no reasonable prospect of an application coming forward which is in line with national planning policy requirements.

Notwithstanding the support for the emerging employment policies, the Plan needs to be aspirational and accommodate extensive economic growth in the Borough and not strive to meet the minimum land requirements.

### **Meeting Housing Needs**

In accordance with the National Planning Policy Framework (NPPF), any Local Plans submitted after the 24<sup>th</sup> January 2019 should be based on the 2019 version of the NPPF including the standard methodology. WBC will be submitting its Local Plan for examination later in 2019 and therefore the revised framework applies.

Paragraph 2 of Planning Practice Guidance (PPG) states that '*the standard method uses a formula to identify the minimum number of homes expected to be planned for*'. Paragraph 10 advises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

**Draft Objective W1 (which references sustainable growth)** and **Draft Policy DEV1 (Housing Delivery)** of the draft Local Plan sets out a clear, immediate and critical need for housing in Warrington and identifies a net minimum requirement for **18,900** new dwellings over a 20-year delivery period (2017 – 2037), equivalent to 945 dwellings per annum. **Draft Policy DEV1** ('Housing Delivery') sets out the trajectory as to how the housing requirement will be delivered:

- 2017 – 2021 (first 5 years) – 847 homes per annum; and
- 2022 – 2037 (following 15 years) – 978 homes per annum.

The target of 945 homes per annum over the Plan period has been established through the LPA's Local Housing Needs Assessment (2019) and is approximately 4% higher than the minimum requirement set by the Government's Standard Housing Methodology (using the 2014 based household projections).

Our client strongly supports the sustainable growth of Warrington. The draft Local Plan proposes to deliver 18,900 new dwellings between 2017 and 2037 and we note that the revised housing need has been calculated in accordance with the NPPF (February 2019). Caddick Group is fully supportive of the standard methodology but emphasises the outcome of the methodology should be read as a minimum figure. Our client would have no objection to the emerging Local Plan identifying a more ambitious quanta of residential development to be delivered over the plan period, to ensure the Plan is effective in delivering its overall economic, employment and housing growth objectives, and is positively prepared.

In terms of the distribution of housing, the strategy is heavily reliant on directing new housing towards previously developed land within the existing urban area and within Warrington City Centre. Such sites often have costs associated with the infrastructure delivery and site remediation/clearance which could impact on deliverability. To ensure that the emerging Local Plan is positively prepared, justified, effective and consistent with national policy and therefore 'sound' in accordance with paragraph 35 of the NPPF, the Council should consider directing a greater level of housing need elsewhere within the Borough. Whilst this would likely result in a requirement for additional Green Belt release than is currently proposed, the Plan would be considered more deliverable.

**Draft Policy DEV2 (Meeting Housing Needs)** requires 30% affordable housing on all greenfield sites of 10 dwellings or more. The policy allows for on or off-site provision and considers references viability. Our client fully supports the principle of improving affordability in Warrington and the flexibility to consider sites individually.

### **Green Belt Release**

**Draft Policy GB1 (Green Belt)** acknowledges that some land will need to be removed from the Green Belt to meet Warrington's development needs. Caddick Group strongly supports the Council's conclusions that exceptional circumstances clearly exist which justify a review of Green Belt boundaries and release of Green Belt in key locations. This will in turn assist with boosting economic opportunities and diversifying housing provision in the borough.

Our client would have no objection to the emerging Local Plan allocating additional Green Belt sites to ensure enough land has been identified and can be delivered to accommodate the growth strategy.

It is also noted that the Council has concluded that there is no need to identify safeguarded land for future development, following a review of its evidence relating to the need for homes and employment land beyond the Plan Period. Paragraph 136 of the NPPF states that '*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*'.

Paragraph 138 requires local authorities where necessary, to identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. Local authorities should also be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. NPPF, paragraph 22 requires strategic policies to look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities such as those arising from major improvements in infrastructure. It is considered that the emerging Local Plan would be made more robust by the inclusion of safeguarded land to ensure the permanence of the Green Belt boundaries beyond the plan period.

Taking into account our comments in relation to meeting housing need, and that the housing targets in the emerging Local Plan are only proposing to meet just over the minimum Local Housing Need, we consider that it would be prudent to include safeguarded land as a contingency plan should a higher growth scenario occur across the Borough, or indeed not all of the anticipated supply be available for development as currently envisaged. In summary, to ensure the Plan is 'sound' by being effective and consistent with national policy, there should be an allowance for safeguarded land to be included within the emerging Local Plan.

### **Delivering Infrastructure**

Our client generally supports **Draft Policy INF5 (Delivering Infrastructure)** which requires development to provide or contribute towards the provision of the infrastructure needed to support it in a timely manner. Our clients also agree that the Council should consider viability at the planning application stage where appropriate.

### **Land at Cherry Hall Farm**

#### Site Context

The site extends to approximately 37.6 hectares of Green Belt Land. The site has previously been promoted through the Councils 'Call for Sites' Exercise and Regulation 18 Consultation. However, the site is not currently included as an allocated site within the draft Local Plan (March 2019).

The land at Cherry Hall Farm represents a highly sustainable, accessible, unconstrained and logical option for Green Belt release that could contribute to the strategic employment and residential requirements for Warrington.

On this basis, we wish to work closely with Warrington Borough Council and other stakeholders throughout the process to develop an appropriate masterplan for employment led, mixed use proposal for the site which reflects the vision and objectives for the Local Plan.

#### Site Deliverability

The NPPF and Government's growth agenda seek to ensure that sufficient land is available in the most appropriate locations to increase employment and housing land supply, support growth and boost home ownership. The site is available, suitable and achievable and is ideally positioned to deliver housing.

In accordance with the NPPF, to be considered deliverable, sites should:

- **Be Available:** A site is considered available where there is confidence that there are no legal or ownership problems;
- **Be Suitable:** A site is considered suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and
- **Be Achievable:** A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site within five years. This is a judgement about the economic viability of a site and the capacity of the developer to compete and sell housing over a certain period considering market factors, cost factors and delivery factors.

#### **An Available Site**

The land does not have any ownership or legal impediments, and our clients are committed to bringing the site forward for development. As such the site would be available to be developed early in the plan period. Our client would not 'landbank' the site if allocated.

#### **A Suitable Site**

The site is in a sustainable location, with access on foot or by public transport to the local centre of Lymm, and the local services and facilities contained therein. Paddington Train Station and Warrington Central Station are both approximately 10km away; both providing onwards travel to Manchester and further afield. The site is extremely well connected to the road network, given its proximity to the motorway; less than 1km from the Lymm services junction for the M6. This motorway connection provides excellent linkages to the wider area.

The site was assessed in the Green Belt Assessment (July 2017) and concludes that the site performs a strong contribution overall to the five Green Belt purposes. However, it is our client's position that the site does not provide a significant contribution to the five purposes of the Green Belt. Our assessment of the site against the five purposes of the Green Belt is set out below:

- **Check the unrestricted sprawl of large built-up areas-** the site is not adjacent to the Warrington urban area and therefore does not contribute to this purpose. There are however strong boundaries for the parcel with woodland areas and the M6 motorway.
- **Prevent neighbouring towns from merging into one another-** in the context that the site is surrounded by defensible boundaries on all sides, including the M6, the separation is retained, and the development would not result in the merging of existing settlements.
- **Assist in safeguarding the countryside from encroachment-** the site has clear durable boundaries on all sites. The site could deliver a sensitive development that could provide

a network of green infrastructure and would not adversely impact on the purpose of safeguarding the countryside from encroachment.

- **Preserve the setting and special character of historic towns-** Lymm is a historic town however the site is not within 250m of a Conservation Area and the site does not cross an important viewpoint of the Parish Church.
- **Assist in urban regeneration, by encouraging the recycling of derelict and other urban land-** there is insufficient land and infrastructure investment up front within the urban area meaning that there is a clear need for the release of the site from the Green Belt. As such an alteration of the Green Belt would not prevent the recycling of derelict or other urban land.

In summary, it has consistently been demonstrated through various submissions to the emerging Local Plan process that the site makes an overall weak contribution to the five purposes of including land within the Green Belt and its removal from the Green Belt would not result in any significant adverse impact to the purposes of the Green Belt. The site is wholly suitable for an employment led, mixed use development and would make a positive contribution towards the employment and housing requirements in Warrington. Employment led development at the site would therefore be classified as extremely sustainable due to the proximity to the existing settlement of Lymm and services of Warrington.

Furthermore, there are no known physical or environmental constraints affecting the site. The site would not result in impact to a historical asset and the site lies fully within flood zone one, therefore it is at low risk of flooding.

Finally, the site also represents a logical option for development in the context that the land to the north of the site is also currently being promoted for development.

### **An Achievable Site**

An employment led mixed use development would likely be the most viable option for this site and there is a realistic prospect that such proposals can be delivered.

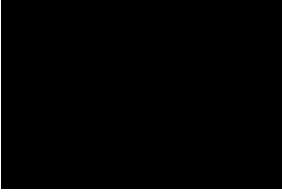
### **Summary**

In summary, Caddick Group's key objective is to ensure that the land's full potential is recognised and identified as a strategic development opportunity in the emerging Warrington Local Plan. The scale of the overall land holding, and its exceptional location coupled with the willingness of the landowner offers potential opportunities to deliver additional benefits to Lymm and the wider area of Warrington.

The development of the site for an employment led scheme would constitute sustainable development in accordance with the NPPF. An employment led development would deliver positive economic, social and environmental benefits which should be afforded significant weight in the plan making process. Furthermore, it has been demonstrated that the site is deliverable as it is available, suitable and achievable.

We would be grateful if you could confirm safe receipt of these representation. Caddick Group would like to maintain an ongoing dialogue with Warrington Borough Council which has taken place in relation to the future development of the site and should you require any further information then please do not hesitate to contact me.

Yours sincerely



**Richard Barton**  
**Director**  
**+44 (0)161 956 4082**  
**Richard.barton@avisonyoung.com**  
**For and on behalf of**  
**GVA Grimley Limited t/a Avison Young**

Fisher German

Cherry Hall Farm

SCALE : 1 : 5000      DATE : 17/11/2016  
MAP FILENAME : [Filename]  
Plan Technology An aerial DTM file is @geomatics.com.au  
Map based on Ordnance Survey MasterMap of 1:25000 scale data with  
the permission of the Controller of HMSO. © Crown Copyright

