

Warrington Local Plan Examination

Matters Statements

MATTER 3 – THE SPATIAL STRATEGY

July 2022

Matter 3 – The Spatial Strategy

Issue

Whether the Spatial Strategy is justified, effective and consistent with national policy, including in terms of the distribution of development across the Borough, site selection, the overall approach to the Green Belt and the overall approaches to infrastructure provision and viability.

(NB. Examination Library reference numbers are provided in brackets after each document referred to in the Matters Statement)

Questions

Housing

Overall Spatial Strategy for housing

1. Is the strategy to maximise the development potential of the existing urban area for new housing appropriate and justified?

1.1 The Council considers the strategy to maximise the development potential of the existing urban area for new housing is appropriate and justified.

1.2 Previous Plans have been successful in promoting the ongoing regeneration of the Inner area of Warrington, ensuring productive development of brownfield land and in securing significant investment in the Town Centre. This remains the priority of the Council. The majority of new development will be within the existing urban area and the Council has significant ambitions to intensify development in the Town Centre and surrounding inner urban area. This will also help with the Council's desire to keep overall journey distances shorter, thus reducing the need to travel by car and promote walking, cycling and public transport in accordance with the Council's Local Transport Plan (LTP4).

1.3 In identifying land to meet the housing requirement, the Council has sought to maximise the capacity of the existing urban area to accommodate new development, in accordance with Paragraph 141 of the NPPF, in order to demonstrate that all reasonable options have been identified for meeting Warrington's development requirements before releasing Green Belt.

2. Is the Council's assessment of urban capacity for the plan period (11,785 homes) realistic and justified by evidence? Has the development potential of the existing urban area been maximised, for example in terms of specific identified sites, an allowance for smaller sites and optimising densities?

2.1 In preparing the Updated PSVLP 2021 (SP1), the Council carried out a detailed assessment of potential brownfield sites through its Strategic Housing Land Availability Assessment (SHLAA) and its Brownfield Register, both of which are

updated on an annual basis. The Council also undertook additional master planning work in the town centre and surrounding area to identify additional brownfield capacity, which was incorporated into the SHLAA.

- 2.2 Following consultation on the Updated PSVLP 2021 (SP1), the Council updated its SHLAA to take into account consented schemes and completions up to the end of March 2021, together with a comprehensive review of all existing and potential additional sites to ensure they are suitable, available and achievable in accordance with the NPPF and to update timescales for their delivery. Throughout it has sense checked its assumptions by reference to what actually is being delivered over time. As such the Council is confident that the urban capacity it has established is realistic.
- 2.3 The Council has sought to apply densities which optimise the use of sites, taking into account realistic viability and housing need. Following previous Local Plan consultations the Council has reviewed its density assumptions for the Town Centre and Inner Warrington and is reviewing its residential parking standards, recognising the potential for high density development, and reduced parking requirements in these locations. The Council is proposing minimum density requirements for the Town Centre and other sites that are in highly sustainable locations, together with minimum requirements for all site allocations to minimise the amount of Green Belt release required.
- 2.4 The SHLAA includes a small sites allowance to ensure such sites are appropriately accounted for in establishing Warrington's urban capacity. As such the Council is confident the Local Plan will maximise the amount of development that is possible on brownfield land.
3. **On a strategic, Borough wide level, does the scale of housing growth required, the capacity of the existing urban area and the inability of neighbouring authorities to accommodate any of Warrington's housing needs provide the exceptional circumstances to justify altering the Green Belt in principle?**
 - 3.1 In accordance with paragraph 141 of the NPPF the Council has examined fully all other reasonable options for meeting Warrington's identified need for development before concluding that exceptional circumstances exist to justify Green Belt release. This includes maximising the capacity of the existing urban area and confirming that neighbouring authorities are not able to accommodate any of Warrington's housing needs.
 - 3.2 The starting point for Warrington's Exceptional Circumstances is the decision to meet the requirement to ensure that sufficient land is provided to meet Warrington's development needs. The Plan's proposed housing requirement will ensure that issues of affordability are, to an extent, addressed and that that sufficient homes are provided to support the probable and planned level of economic growth, but this can only be achieved with the release of Green Belt. Similarly if Warrington is to provide sufficient employment land to meet its future needs then this can only be achieved with the release of Green Belt land.

- 3.3 The Exceptional Circumstances are further justified through the spatial strategy of the Plan. The Plan will enable the creation of new sustainable communities but in a manner which will support the delivery of strategic infrastructure required to address existing concerns with the transportation network of the district which gives rise to issues of congestion and unlock major development sites with significant brownfield capacity. This will ensure that the release of Green Belt land will work in parallel with brownfield development and infrastructure delivery to provide a comprehensive Plan for Warrington as a whole.
- 3.4 The Council has assessed options of planning for lower levels of development. These include options for merely meeting Warrington's basic demographic need for homes. These options would reduce the amount of Green Belt land required to be released.
- 3.5 In the short term the Council considers that Warrington's economic strength and attractiveness will result in ongoing development pressure. This may initially be accommodated in the existing urban area through higher density development but these options still require Green Belt release over the plan period.
- 3.6 A lower level of development may reduce the ability of the Council to plan comprehensively for growth and as a result infrastructure delivery could be piecemeal and reactive. It is likely that there will be an absolute and proportionate increase in the number of people commuting into the Borough to work. The consequences from this are likely to include increasing congestion on Warrington's transport network and a risk of worsening air quality on some of the busier transport corridors where people live.
- 3.7 A lack of housing supply over the longer term is likely to increase house prices, making housing less affordable for Warrington's residents, in particular young people looking to get on the housing ladder. It will also reduce the supply of affordable housing to meet Warrington's needs thereby making it more difficult to accommodate key workers.
- 3.8 From Duty to Cooperate discussions it is also apparent that if Warrington does not meet its development needs then this will place pressure on the other Boroughs within the Mid-Mersey Housing market area and in other adjoining Council areas.
- 3.9 Further, the Council does not consider the two exemptions for meeting objectively assessed housing need, as set out under paragraph 11(i) and 11(ii) of the NPPF, are relevant to Warrington's emerging Local Plan:
- Through the options assessment process, taking into account the more detailed evidence base that has been prepared, the Council does not consider that the loss of Green Belt provides a sufficiently strong reason for restricting the overall scale, type or distribution of development in the plan, given the likely social and economic consequences of this course of action.

- The Council furthermore does not consider that any adverse impacts significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF taken as a whole

4. What is the basis for a flexibility allowance of 10% in terms of the housing requirement? Is this justified?

- 4.1 It is prudent and conventional 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. The Council has used a non-implementation rate of 10% which it considers provides sufficient flexibility in the context of the Plan's proposed housing land supply. The flexibility benchmark equates to a similar size to one of the Plan's large allocation sites. The Council has reviewed the outcome of a number of recent Local Plan examinations in confirming this figure, as well as considering the nature of its own allocations.

5. What is the basis for the removal of land from the Green Belt to accommodate at least 4,821 homes in the plan period (see Policy DEV1) given the figure of 4,372 in Table 1 of the Local Plan, particularly as 10% flexibility has already been factored in?

- 5.1 In considering potential options for Green Belt release, the Council has assessed options that are within a range of 5% above and 5% below the 10% flexibility benchmark. This is because the options were defined by the capacity of the individual site components rather than seeking to precisely match the 10% requirement.
- 5.2 If the Council has released Green Belt to exactly match the 10% flexibility figure, then this could have required the need to limit capacity on potential development sites and / or resulted in Green Belt boundaries that were not capable of enduring over the longer term. This is not an exact science and this approach is considered appropriate as a matter of judgment in respect of this level of development.

6. In terms of high level options for Green Belt release, what is the basis for the chosen approach i.e. the majority of Green Belt release adjacent to the main urban area with incremental growth in outlying settlements? Why was this chosen ahead of other options? Is this justified?

- 6.1 The Council assessed three options for the distribution of housing from Green Belt release:
- (1) All Green Belt Release accommodated adjacent to main urban area.
 - (2) Majority of Green Belt Release accommodated adjacent to main urban area with 'incremental growth' in outlying settlements.
 - (3) Green Belt release adjacent to main urban area complemented by a sustainable extension to one or more outlying settlements and incremental growth to remaining settlements.

- 6.2 Given the number of sites submitted to the Council for consideration through the Local Plan process, it would be physically possible to define an option with a much higher level of development being allocated to the outlying settlements. Previous iterations of the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) at the Preferred Development Option (PDO) 2017 and previous PSVLP 2019 stage assessed higher levels of growth in the settlements.
- 6.3 The conclusions from these assessments were that the environmental impacts would be more significant than other options and could be difficult to mitigate. Further, the Council considers that such an option would not accord with the Plan's Objectives and could undermine the regeneration of the main Warrington urban area. The Council therefore considers that such an option would be unreasonable.
- 6.4 The Housing Growth and High Level Spatial Options Assessment is set out in the table provided at Appendix 2 of the Development Options and Site Assessment Technical Report – September 2021 (OS1). The conclusions of the SA/SEA assessment are summarised in the assessment table. The full SA/SEA is provided as a separate evidence base document (SP3).
- 6.5 The Options Assessment takes into account all relevant evidence base that has been prepared in support of the Local Plan, including a number of evidence base documents which have been updated following the 2019 consultation. The evidence base includes outputs from the Council's Multi-modal Transport Model (T1), Strategic Flood Risk Assessment (E1 to E3), Air Quality Modelling Report (E5), Minerals Resource Study and Policy Review (M3) and up to date information about the capacity of existing infrastructure across the Borough.
- 6.6 It is considered that Option (2) performs best against the Plan objectives and in terms of SA/SEA. Focusing the majority of Green Belt release adjacent to the main urban area is considered to provide the best development option to ensure the sustainability of Warrington's growth as a whole, whilst enabling incremental growth to the outlying settlements that will contribute to their long term vitality.
- 6.7 Option (1) does not provide the same benefits for the settlements, whilst Option (3) results in greater character impacts in the settlements and provides a weaker contribution to supporting the sustainable growth of the main urban area.
- 7. What is the basis for the overall split of housing allocations and Green Belt release between land adjacent to the main urban area (at least 4,020 homes in Policy DEV1) and outlying settlements (at least 801 homes in Policy DEV1)? Is this justified?**
- 7.1 Under Option 2, the Council used the approximate capacity of 1,000 homes to be allocated to the outlying settlements. This is based on a rough benchmark of 10% growth in each settlement, which the Council considers can be accommodated by existing infrastructure (with limited expansion of existing infrastructure if necessary) and which will not impact on the overall character of the settlement.

- 7.2 Two sites that were included in the previous Proposed Submission Version (2019) of the Local Plan are no longer being proposed for allocation:
- Burtonwood (160 homes) – this site has been removed given the uncertainty of the Bold Forest Garden Suburb urban extension that is proposed in St Helens. This could have significant implications on the local highways network in Burtonwood, albeit the impacts will not be understood until the site allocation has been confirmed and more detailed proposals for the urban extension come forward later the Plan Period of the St Helens Local Plan. Without an understanding of these impacts it is not considered appropriate to make an allocation in Burtonwood.
 - Lymm – Massey Brook Lane (60 homes) – the site promoter has requested that the site is withdrawn from the Local Plan process, such that the site is no longer considered to be deliverable.
- 7.3 Given the reduction in the proposed headline housing requirement from the Previous Proposed Submission Version Local Plan (2019), it is not considered that the loss of these sites has a material impact on the Plan’s spatial strategy. It is therefore not proposed to allocate any additional sites in the outlying settlements.

Outlying settlements

8. How were the site allocations in the outlying settlements selected, what factors were used to assess potential sites and what criteria were used?

- 8.1 A very large number of sites in proximity of the outlying settlements were submitted as part of the Local Plan ‘call for sites’ and during subsequent Local Plan consultations. The submitted sites had many times the capacity of the number of homes required to support the Plan’s proposed spatial development strategy of ‘incremental growth’ in the outlying settlements. The Council therefore adopted a site selection methodology to confirm the most sustainable sites proposed to be allocated in the previous Proposed Submission Version Local Plan (2019).
- 8.2 The Council discounted sites making a strong contribution to the Green Belt. This was to ensure that the impact on Warrington’s Green Belt was minimised. Sites within Flood Zone 3b were also removed at this stage, based on the Strategic Flood Risk Assessment, which was undertaken for all sites considered as part of the Local Plan process; and all sites less than 0.25 hectares unless they were adjacent to a larger site.
- 8.3 Having removed sites making a strong contribution to the Green Belt; at high risk of flooding; or less than 0.25 hectares, the Council was confident that there were sufficient remaining sites to meet the required level of development for the proposed spatial option of ‘incremental growth’ in the outlying settlements.
- 8.4 The remaining sites were then assessed in detail against a consistent set of criteria relating to performance against the Plan’s Objectives and SA/SEA site assessment

criteria to establish that the sites were 'suitable'. Additional criteria were included to assess whether the sites were 'available' and development was 'achievable'. The assessment was based on a 'traffic light' assessment against key criteria with more detailed consideration given to potential site access arrangements. The Council also undertook a more detailed review of the potential impact of sites on identified Minerals Safeguarding Areas.

- 8.5 Having undertaken the assessments, contender sites were identified and then compared for each settlement, taking into account their relative performance against the assessment criteria. This enabled confirmation of the final site(s) to be allocated for each settlement.
- 8.6 Following consultation on the previous PSVLP 2019, the Council has considered relevant representations and reviewed the evidence base underpinning the assessment process. In particular, the Environment Agency have updated their Flood Zone plans for the Borough, which has had implications for some of the sites submitted in Lymm and Hollins Green.
- 8.7 The Council has also liaised with relevant service providers to ensure the conclusions regarding the capacity of local highways, schools, health facilities and other community facilities remain up to date.

9. What evidence fed into this process e.g. Green Belt Assessment, flood risk data etc?

- 9.1 In assessing sites against the site assessment criteria, the Council used a wide range of evidence base documents including Green Belt Assessment Collated Report 2021 (GB4), Landscape Character Assessment 2007 (E6), Strategic Flood Risk Assessment (E1 to E3), Open Space Audit 2015 (IN6), Warrington Playing Pitch Strategy and Action Plan January 2020 (IN3), Warrington Sports Facilities Strategic Needs Assessment 2015 (IN5) and Minerals Resource Study and Policy Review March 2017 (M4).
- 9.2 In establishing impacts of development, required mitigation and required improvements to infrastructure, the Council has liaised with relevant Council services, including Transportation, Education, Environmental Protection and Environmental Services. The Council has also engaged with relevant external services providers including the NHS and with neighbouring authorities and statutory consultees through the Duty to Cooperate.
- 9.3 Each of the proposed allocations has also been subject to viability assessment as set out in Local Plan Viability Assessment – August 2021 (V2), taking into account policy and planning obligations requirements, to demonstrate the respective allocations are capable of being delivered. It is apprehended that all can be delivered and still provide the requisite affordable housing contribution, noting that this should not then be revisited at the application stage.

- 9.4 The implications of removing each of the proposed allocation sites from the Green Belt has been assessed in Green Belt Site Selection – Implications of Green Belt Release August 2021 (GB3).
- 9.5 A Heritage Impact Assessment has also been prepared for each of the settlement allocations where there was an identified impact on one or more heritage assets (HIA6), in liaison with Historic England, which has informed the individual allocation policies.
- 9.6 All of the proposed allocations have also been tested through the Council’s Local Transport Model as detailed in the Transport Model Testing of the WBC Local Plan – August 2021 Report (T1).

10. How has the process been recorded and documented? What role did the SA have?

- 10.1 The settlement site assessment proformas that were updated following the Previous Submission Version Local Plan (2019) consultation are included in Site Assessment Proformas September 2021 (SAP1). The proformas where the site assessments remained up to date are included in Site Assessment Proformas 2019 (SAP2).
- 24.4 SA Criteria are embedded into the settlement site assessment proformas to ensure that SA/SEA is integral to the assessment. The SA/SEA for each contender site in the settlements, including those where updates have been made, are also included in the Sustainability Appraisal SA Report August 2021 (SP3).
- 24.5 The SA/SEA is one of the factors that informs the judgment as to site selection but does not govern it. That is a matter of judgment based upon the above array of work.

11. Which options were considered, why were alternative options discounted and why were the site allocations chosen?

- 11.1 All sites adjacent to the outlying settlements apart from those assessed as Strong Performing in Green Belt terms and those in Flood Zone 3b were assessed as contender sites. The decision on which sites to include for each settlement was taken through a review of all the contender sites for each individual settlement to identify the best performing sites across of criteria assessed. The top performing site was sufficient to meet the level of development proposed for each respective settlement in accordance with the Plan’s spatial strategy with the exception of Lymm where additional sites were required.
- 11.2 The sites in Burtonwood and at Massey Brook Lane in Lymm that were included in the previous Proposed Submission Version Local Plan (2019) are no longer being proposed for allocation for the reasons set out at 7.2 above.
- 11.3 Given the reduction in the proposed headline housing requirement, it is not considered that the loss of these sites has a material impact on the Plan’s spatial

strategy. It is therefore not proposed to allocate any additional sites in the outlying settlements.

- 11.4 No sites were identified for Glazebury given that sites here were strongly performing in Green Belt terms and / or they did not perform sufficiently well against the assessment criteria. Given the small number of homes that would have been allocated to Glazebury, the Council concluded it was not necessary to re-allocate any additional homes to the other settlements.

12. Was the methodology applied to site selection appropriate and were the conclusions of the process justified?

- 12.1 The Council considers that the methodology applied is appropriate. The methodology has enabled the Council to assess sites against detailed site assessment and SA/SEA criteria based on suitability, availability and achievability and against the Plan objectives and spatial strategy – on their own merits and in combination with the other plan allocations. The robustness of the methodology has ensured that the conclusions are fully justified.

13. Is the scale of housing growth in each of the outlying settlements justified?

- 13.1 The Council considers that the scale of housing growth is consistent with the Plan's Spatial Strategy of 'incremental growth' in each of the outlying settlements. Incremental development will provide housing choice and help support local services without placing unacceptable pressure on local infrastructure. It will facilitate an appropriate level of growth whilst ensuring that the character of the respective settlements is maintained.

Adjacent to the main urban area

14. How were the Main Development Areas adjacent to the main urban area involving Green Belt release (SE Warrington Urban Extension, Fiddlers Ferry and Thelwall Heys) selected, what factors were used to assess potential options and what criteria were used?

- 14.1 As identified in terms of the overall spatial strategy, the High Level Spatial Options remained the same as within the draft Local Plan 2019 (Development Options and Site Assessment Technical Report 2021 (O1) – Appendix 2), that is that Green Belt release would be focused adjacent to the main urban area with some incremental development to the settlements.
- 14.2 When defining the main development areas, as a starting point, the Council has reviewed proposals and options within the Preferred Development Options (PDO) 2017 and the PSVLP 2019. The PDO 2017 considered how growth could be delivered at the Warrington urban fringes. Five options were considered to provide for the level of growth identified consisting of the following combination of sites/areas of growth:

- Option 1: Garden City Suburb
- Option 2: Garden City Suburb, South West Urban Extension (Preferred Option)
- Option 3: Garden City Suburb, West Urban Extension
- Option 4: Garden City Suburb, South West Urban Extension and West Urban Extension
- Option 5: Dispersed Green Belt adjacent to the Warrington Urban Area

14.3 At the PSVLP 2019 stage six options were considered for growth adjacent to the main urban area relative to the needs identified:

- Option 1: Garden Suburb, South West Urban Extension (Preferred Option)
- Option 2: Garden Suburb, West Urban Extension
- Option 3: Garden Suburb, North Urban Extension
- Option 4: Garden Suburb, Green Belt dispersed
- Option 5: Garden Suburb, South West Urban Extension, Green Belt dispersed
- Option 6: More dispersed Green Belt adjacent to the urban area

14.4 Having reviewed the site assessment process that informed the previous PSVLP 2019, responses to the previous PSVLP consultation and updated evidence base work, the Council has re-established the component development proposals from which the options for assessment were then defined.

14.2 The South East Warrington Urban Extension emerged as a result of a review of the former Garden Suburb allocation in the PSVLP 2019. The Council now accepts that the previous Garden Suburb was overly optimistic in terms of build rate and co-ordination of all landowners to provide the infrastructure required to support the allocation. The Council identified 4 options within the Garden Suburb boundary to form a smaller South East Warrington Urban Extension which could deliver around 2,400 homes in the plan period and between 800 and 1,800 beyond the plan period. These were subject to a separate assessment as defined in paragraphs 4.23 to 4.33 of the Development Options and Site Assessment Technical Report 2021 (O1) with the full assessment at Appendix 4 (page 76) of the document.

14.3 Fiddlers Ferry also became an option considered in the site assessment process as a result of Scottish Southern Electric (SSE) confirming closure of the power station in 2019, with electricity production ending in 2020. Although the substantive operational area of the power station is being promoted for employment uses, SSE are seeking the release of Green Belt land for housing on agricultural land under their ownership adjacent to the east of the power station site, in order to cross subsidise the remediation of the power station. Over the longer term, there is also the potential for residential development to the south of the railway line on land currently in the Green Belt. Although it does not physically adjoin the main urban area of Warrington, it adjoins an existing employment location in Widnes, within the borough of Halton. As such, its characteristics are in keeping with an urban allocation, as opposed to sites being promoted in the outlying settlements. The site

has therefore been assessed as a development 'opportunity site' for consideration with the other Main Urban area options.

14.4 In addition to the above sites the Council also considered weak performing Green Belt sites adjacent to the main urban area. This was in response to consultation responses to the PSVLP 2019 which highlighted that additional sites should be considered in the early years of the Plan Period to offset the longer lead in times and potential risks associated with larger urban extensions. This is detailed in paragraphs 4.16 to 4.18 of the Development Options and Site Assessment Technical Report 2021 (O1). The Council then reconsidered these sites with regard to highways access, whether existing social infrastructure in the vicinity of the sites could accommodate the development and broader sustainability factors. Through this process the Council identified the potential for the development of 310 homes at Thelwall Heys.

14.5 Various combinations of Main Development Areas were identified in terms of whether they would meet the needs of development over the plan period (and with varying capacity beyond the plan period) once the capacity of the urban area had been considered. The options also took account of a flexibility factor of 10% in terms of land supply, with a range of 5% above and below this benchmark threshold – this is detailed in paragraphs 2.14 and 2.15 of the Development Options and Site Assessment Technical Report 2021 (O1). Five principal options were identified as follows:

- Option 1: Urban extension to the south east of Warrington of around 2,400 homes & an urban extension to the south west of around 1,700 homes
- Option 2: Urban extension to the south east of Warrington of around 2,400 homes & redevelopment of Fiddlers Ferry opportunity site for 1,300 homes
- Option 3: Urban extension to the south east of Warrington of around 2,400 homes, redevelopment of Fiddlers Ferry opportunity site for 1,300 homes and development at Thelwall Heys of 310 homes
- Option 4: Urban extension to the south west of around 1,700 homes, redevelopment of Fiddlers Ferry opportunity site for 1,300 homes and development at Thelwall Heys of 310 homes
- Option 5: Urban extension to the south west of around 1,700 homes, redevelopment of Fiddlers Ferry opportunity site for 1,300 homes

14.6 The above options were then assessed against each of the Local Plan Objectives and additional criteria: deliverability considerations and SA/SEA conclusions. This is detailed within Section 4 of the Development Options and Site Assessment Technical Report 2021 (O1) and Appendix 5 (page 84) to the document includes the full Options Assessment of Main Development Locations.

15. What evidence fed into this process e.g. Green Belt Assessment etc?

15.1 The options assessment process has been informed by the Local Plan Objectives and by the Local Plan evidence base as identified on the Council's website. Firstly, a range of borough-wide evidence base documents fed into the assessment process to

enable the Council to confirm its Preferred Option – this included Green Belt Assessment 2016 (GB5), Landscape Character Assessment 2007 (E6) and Strategic Flood Risk Assessment – Level 1 2018 (E2) and Level 2 2019 (E3) and ongoing Sustainability Appraisal / Strategic Environmental Assessment. Area profiles were produced in 2017 (Area Profiles and Options Assessment 2017 (O4)) and individual site assessments were carried out informed by ‘call for sites’ responses dating back to 2016.

- 15.2 Once the Preferred Option had been identified, a further level of assessment was carried out to ensure that the option was deliverable and any impacts could be properly mitigated – this included more detailed site specific assessments including implications of removal of sites from the Green Belt, Heritage Impact Assessments, and transport modelling.

16. How has the process been recorded and documented? What role did the SA have?

- 16.1 The options process for the Main Development Areas has been documented in the Development Options and Site Assessment Technical Report 2021 (O1) and Appendix 5 (page 84) to the document includes the full Options Assessment of Main Development Locations.

- 16.2 The SA has been integral to informing the site assessment process and indeed it has been an iterative process with the options assessment feeding into the SA and vice versa. Options have been appraised and refined through several stages of the plan making process and this is documented in Section 4.2 of the Sustainability Appraisal Report 2021 (SP3).

17. Which options were considered, why were alternative options discounted and why were the Main Development Areas (involving Green Belt release) chosen?

- 17.1 Five options were identified as set out in paragraph 14.5 above.

- 17.2 Through the Options Assessment process, taking into account the SA/SEA, the Council concluded that Option 3 is its preferred option. This Option performs strongly across the majority of Local Plan Objectives. It is capable of meeting development needs and delivering the infrastructure needed to support the development itself and also contributing to the wider sustainable development of Warrington as a whole. It enables the regeneration of Fiddlers Ferry power station, the largest available brownfield site in the Borough. 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. The Council considers this provides the Exceptional Circumstances required for Green Belt release in accordance with the requirements of the NPPF.

- 17.3 Such an approach is also consistent with NPPF Paragraph 73 which recognises that the most sustainable approach to new infrastructure delivery may be through large extensions to an urban area or through the creation of a new communities.

- 17.4 The reasons for ruling out the other four options are set out in paragraphs 4.45 to 4.47 of the Development Options and Site Assessment Technical Report 2021 (O1) – Option 1 excluded the Fiddlers Ferry development opportunity area; Option 2 performed strongly but excluded Thelwall Heys which has the ability to deliver new homes early in the plan period; and Options 4 and 5 would generate a level of development in South Warrington which could not be supported by existing infrastructure, in particular secondary school provision, and would have a significant impact on the Green Belt between Warrington and Halton. The reasons for ruling out alternative site options across the Borough are summarised in paragraphs 4.19 to 4.22 (O1).
- 17.5 Urban extensions in north and west Warrington had previously been ruled out due to issues relating to Green Belt performance and infrastructure delivery. An urban extension in east Warrington has been ruled out due to ecological, infrastructure and Green Belt constraints. Similarly the Council has considered a dispersed development option focusing on the poorest performing Green Belt sites however this option did not perform well enough to include in a further options assessment process.

18. Was the methodology applied appropriate and were the conclusions of the process justified?

- 18.1 The Council considers that the conclusions of the options assessment process are justified. The options process for the Main Urban Area provides a qualitative as well as a quantitative assessment of each option. This is because there are advantages and disadvantages in each of the options which require judgement and do not necessarily result in a single option which can be measured as quantifiably better than another. The Council considers this is consistent with paragraph 35 of the NPPF (2021) which requires the Local Plan to provide an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Employment land

19. What is the basis for the calculation of the existing supply of employment land within the Borough? What was included and excluded? Is the approach robust and justified?

- 19.1 The existing supply of employment land comprises sites with planning permission for employment sites within use classes B2, B8 and E use classes that fall within the previous use classes of B1a, B1b and B1c.
- 19.2 In undertaking the Warrington Economic Development Needs Assessment (EDNA) 2016 (EC5), the Council's consultants reviewed the land supply identified by the Council and removed sites considered to be constrained or likely to be brought forward for other uses. The consultants also reviewed existing employment locations in the Borough to identified additional development capacity and assessed levels of

vacancy. This enabled the identification of a more accurate land supply position (See Section 6).

- 19.3 This has been updated through the preparation of the Warrington EDNA 2019 (EC3) (See Section 4) and Warrington EDNA 2021 (EC2) (See Section 4) together with ongoing annual monitoring by the Council through the Annual Monitoring Report process confirming new consents which are added to the supply and completions which are removed.
- 19.4 It should be noted that the EDNA 2021 has accounted for the Council's redevelopment proposals in inner Warrington which will see 19.03 ha of largely occupied employment land, primarily in the Stadium Quarter and Southern Gateway, lost to mostly residential uses.
- 20. Is it justified to include 31.80ha from the Omega Extension in St Helens in the supply for Warrington? Should a greater area be included given that consent has now been granted for 75ha?**
- 20.1 Warrington has agreed with St Helens in principle that the westward extension of Omega (identified as strategic employment site allocation 1EA in the newly adopted St Helens Borough Local Plan), which is within St Helens administrative boundary will contribute to meeting Warrington's employment land needs.
- 20.2 The potential of the Western Extension of Omega formed part of Duty to Cooperate discussions ahead of the publication of the draft St Helens Local Plan. Given that the allocation effectively extends an established employment location within Warrington and will be accessed exclusively through Warrington's highways network, both Councils agreed that this site should properly contribute to meeting Warrington's employment land needs.
- 20.3 Additional employment land will now come forward at Omega West, following the decision of the Secretary of State in November 2021 to grant permission for a 75 ha development. The additionally consented land could make a contribution to meeting Warrington's employment land needs, over and above the 31.22ha already agreed through the Duty to Cooperate process, subject to further agreement to this effect being reached and formalised through the Duty to Cooperate.
- 20.4 Construction of the site has now commenced. Warrington consider the rational for the 31.22ha already agreed as contributing to meeting Warrington's needs applies equally to the additionally consented land.
- 20.5 To date, however, no agreement has been reached between the two Councils that this land could contribute to meeting Warrington's needs. It is therefore not justified at this point in time, without agreement through the Duty to Cooperate with St Helens Borough Council, that the additional land at the Omega extension could be included in the employment supply for Warrington. Further discussions between Warrington and St Helens through the Duty to Co-operate would be needed to

consider and potentially secure such an approach. Nonetheless given the recent adoption of the St Helens Borough Local Plan, the view of Warrington is that there is a compelling logic for the whole area to be attributed to Warrington's needs rather than St Helens.

- 20.6 Warrington is aware that work to assess potential housing and employment development needs to inform draft policies in the Liverpool City Region Spatial Development Strategy (SDS) is currently under preparation. It is understood that this will be published alongside the next version of the SDS in early autumn and will inform further Duty to Cooperate discussions.
- 21. On a strategic, Borough wide level, does the scale of employment land required and the existing supply (within Warrington and at the Omega Extension in St Helens) provide the exceptional circumstances to justify altering the Green Belt in principle?**
- 21.1 The starting point for Warrington's Exceptional Circumstances is the requirement to ensure that sufficient land is provided to meet Warrington's development needs over the plan period. If Warrington is to provide sufficient employment land to meet its future needs then this can only be achieved with the release of Green Belt land.
- 21.2 The Exceptional Circumstances are further justified through the spatial strategy of the Plan. The Plan will enable the creation of new sustainable communities but in a manner which will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity. This will ensure that the release of Green Belt land will work in parallel with brownfield development and infrastructure delivery to provide a comprehensive Plan for Warrington as a whole.
- 21.3 The Council has assessed options of planning for lower levels of development. These include options for meeting purely local need for employment land. These options would reduce the amount of Green Belt land required to be released.
- 21.4 If the Council does not release additional land for employment, then the Council is concerned that in the medium and longer term Warrington's status as a key driver of the North West economy will be threatened. As development land is used up, potential development and investment would inevitably be lost to other regions of the UK and potentially overseas. The Council's Economic Development Needs Assessment is clear that there is already significant suppressed demand for employment land.
- 21.5 Further, the Council does not consider the two exemptions to meeting objectively assessed needs, as set out under paragraph 11(i) and 11(ii) of the NPPF, are relevant to Warrington's emerging Local Plan:
- Through the options assessment process, taking into account the more detailed evidence base that has been prepared, the Council does not consider that the loss

of Green Belt provides a strong reason for restricting the overall scale, type or distribution of development in the plan.

- The Council does not consider that any adverse impacts significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF taken as a whole.

22. How were the Main Development Areas for employment (SE Warrington Employment Area and Fiddlers Ferry) selected, what factors were used to assess potential options and what criteria were used?

22.1 The Council re-assessed all of the potential employment sites submitted for consideration as part of the Local Plan process, together with new sites submitted, to take into account the most up to date evidence and market considerations as part of the updated EDNA 2021 (EC2).

22.2 In updating the EDNA assessment, sites are graded A to E with 'A' sites judged to be the best performing to meet strategic employment needs and 'B' sites the best performing to meet local employment needs. The sites are also given a '+' where there are no significant constraints to the site coming forward, discounting Green Belt status, or a '-' where there is a potential significant constraint(s) on the site coming forward, although the constraint(s) could potentially be overcome with investment.

22.3 The EDNA recommended the Council gives detailed consideration to the identified A and B graded sites which provide the potential to meet the identified shortfall of employment land.

22.4 These sites were assessed (if new) or re-assessed (if considered as part of the PPSVLP 2019) against the Council's site selection criteria, including SA/SEA criteria. The employment site proformas containing the assessments for Grade A and B sites are in the Site Assessment Proformas 2021 (SAP1) (Section 5). The conclusions section in the pro-forma provides the basis for the decision to include or exclude a site from the Local Plan process.

23. What evidence fed into this process e.g. Economic Development Needs Assessment, Green Belt Assessment etc?

23.1 The EDNA assessment provides a detailed assessment of the suitability and deliverability of sites from an employment perspective, in the context of the wider assessment of Warrington's economy.

23.2 The Warrington Site Selection processes then assesses sites against suitability, availability and deliverability criteria, incorporating SA/SEA criteria, Green Belt Assessment and an assessment against the Objectives of the Plan. This then enables an overall conclusion on the site to be made.

23.3 The preferred sites at Fiddlers Ferry and South East Warrington Employment Area were then subject to further detailed assessments before the allocations were confirmed. This included engaging with the site promoters in the preparation of illustrative masterplans for the sites; engagement with neighbouring boroughs and statutory consultees through the Duty to Cooperate Process; preparation of Heritage Impact Assessments; assessment of implications of removing the sites from the Green Belt and allocation specific viability assessments as part of the wider Local Plan Viability Assessment.

24. How has the process been recorded and documented? What role did the SA have?

24.1 The EDNA site assessments are contained in Section 5 of the Warrington EDNA 2021 (EC2).

24.2 The employment site proformas containing the assessments for the Grade A and B contender sites are in the Site Assessment Proformas 2021 (SAP1) (Section 5).

24.3 The employment proformas for all other employment sites are contained in Site Assessment Proformas 2019 (SAP2).

24.4 SA Criteria are embedded into the employment site assessment proformas to ensure that SA/SEA is integral to the assessment. The SA/SEA site assessments are also included in the Sustainability Appraisal SA Report August 2021 (SP3).

24.5 The SA/SEA also assessed the options for broad locations for employment growth ahead of the Updated Proposed Submission Version Local Plan 2021 as detailed in paras 5.3.1 to 5.3.10. The SA options assessment contributed to the assessment detailed in the employment site assessment proformas.

25. Which options were considered, why were alternative options discounted and why were the Main Development Areas for employment chosen?

25.1 The identified A and B graded 'contender' sites were:

- Land at Bradley Hall Farm, Cliff Road - Six56 (Phase I) - 92ha
- Land around Barleycastle Lane, Barleycastle (Six sites) - 44.92ha
- Six56 Phase II – 70ha
- Fiddlers Ferry – 101 ha
- Port Warrington - 60 ha
- St Modwen – Rixton Scheme – 47ha
- Land at Arpley Meadows, Eastford Road - Warrington Commercial Park – 25.47ha

25.2 The Council considers that Fiddlers Ferry should obviously be the priority for employment allocation given it is a brownfield site in need of remediation and redevelopment following the closure of the power station.

25.3 The Council then considers the next priority for allocation are the sites in south east Warrington comprising Land at Bradley Hall Farm, Cliff Road - Six56 (Phase I) and

Land around Barleycastle Lane, Barleycastle. The Council considers that these sites should be combined into a single allocation – the South East Warrington Employment Allocation - given their proximity and need for both to contribute to the same supporting highways infrastructure.

- 25.4 The Council is not proposing to include the wider area of land being promoted as a second phase of 'six56' given concerns around cumulative impact of development in south east Warrington, including impact on the Green Belt and on the local and strategic road network.
- 25.5 An extended Port Warrington was proposed to be allocated in the previous PSVLP 2019. A large number of objections were received in response to its proposed allocation due to the loss of Moore Nature Reserve and the impact on the Green Belt between Warrington and Runcorn. The Council has given detailed consideration to these factors in its options assessment.
- 25.6 The Council has also considered the impacts of the Port Warrington proposal on the Western Link. The modelling work undertaken by the Council raises serious concerns that traffic generated from the Port is likely to displace traffic that would otherwise use the Western Link, pushing traffic back into the town centre and offsetting the key intended benefits of the new road in relieving congestion across Warrington. To mitigate the impact of the development, it is likely that significant additional capacity would need to be provided at the junctions of the Western Link and the A57 and the A56. The extensive scale of improvements required to these junctions is likely to raise very significant engineering, deliverability and viability issues. Port Warrington is therefore no longer being proposed to be allocated.
- 25.7 The Commercial Park was also proposed to be allocated in the previous PSVLP 2019. This has also not be allocated in the updated draft Local Plan primarily due to concerns around its potential impact on the Western Link.
- 25.8 The proposal at Rixton has moved up in terms of its grading due to St Modwen, an established developer, now promoting the employment development. Further, the Environment Agency's revised Flood Risk Zone boundaries have confirmed that the site is no longer within Flood Zone 3. The Council does not consider this site performs as well as Fiddlers Ferry and the South East Warrington Employment area, given its strong Green Belt performance and concerns regarding intervening landownership which could place limitations on the scale and location of employment that could be developed on the site.
- 25.9 The Council has previously given consideration to a site at Joy Lane which could provide a modest extension to Omega north and has been graded as a 'B -' site' in the EDNA. The site was not allocated in the previous PSVLP due to concerns around concerns the ability of the site to deliver the required infrastructure improvements to the local and strategic road networks. The Council does not consider there has been any change in circumstance to change its previous conclusions in respect of this site.

- 25.10 The Council has considered the revised employment led proposal put forward by Patrick Properties following the 2021 Regulation 19 consultation.
- 25.11 The Council is of the opinion that at this stage, land to the south of Birchwood Station is an unreasonable option for employment development. The developer has carried out some provisional investigation into underlying peat, but the Council's ecological consultants do not think this is sufficient to overcome what would likely to be a significant objection from Natural England. It is noted that the site promoter has included record of a phone conversation with an Officer from Natural England which implies that the site promoter has addressed Natural England's concerns. The Council has subsequently raised this issue with Natural England who have confirmed they would be very concerned about the impact on Peat from this development proposal. The Inspectors may wish for Natural England to confirm their position in this respect.
- 25.12 Further, whilst the Council agrees there are long term benefits in terms of access to the station and potential improvements to the station including a new park and ride facility, the developer has not submitted any detailed proposals in terms and viability and deliverability. Further, the daytime frequency of rail services on the Warrington to Manchester / Liverpool line ,including and in particular at Birchwood Station, is planned to be significantly reduced from December 2022 as part of Network Rail's Manchester Rail Recovery Taskforce programme. Therefore, whilst the principle of station improvements is supported by Network Rail and the Rail Delivery Group, and the Council continues to lobby hard for further enhancements, the Council is concerned at this stage, that the committed service levels from December 2022 are highly unlikely to support the business case for the station improvements and park and ride facility proposed, and insufficient evidence has been produced by the developer to indicate otherwise.
- 25.13 As such, the Council will consider land south of Birchwood, together with all other potential employment sites, as part of any future review of employment land in accordance with Policy DEV4 of the UPSVLP 2021.

26. Was the methodology applied appropriate and were the conclusions of the process justified?

- 26.1 The Council considers that the methodology applied is appropriate. The methodology has enabled the Council to assess sites against detailed economic criteria, against SA/SEA criteria, against the Council's site assessment criteria based on suitability, availability and achievability and against the Plan objectives and spatial strategy – on their own merits and in combination with the other plan allocations. The robustness of the methodology has ensured that the conclusions are fully justified.

The Green Belt

- 27. Should the Local Plan identify safeguarded land? If so, where and for what purpose?**

- 27.1 The Council considers that there will be sufficient land supply to meet the level of housing need for at least 12 years following the end of the Plan period. This is due to the ability of the Main Development Areas to deliver homes beyond the end of the Plan Period; the anticipated supply of brownfield sites; increased supply of homes over the Plan period addressing issues of affordability; and the projected slower growth in households over time. This is detailed in paragraphs 5.8 to 5.17 of the Development Options and Site Assessment Technical Report 2021 (O1).
- 27.2 The Council is therefore confident that there is no need for the additional flexibility that would be provided by designating any land as safeguarded land in respect of future housing or employment needs and that the amended Green Belt boundaries are capable of enduring well beyond the end of the Plan period.
- 27.3 If housing land supply issues become apparent through the Council's monitoring process, then the Council will give consideration to a review of the Plan in accordance with Policy M1.
- 27.4 The proposed allocations at Fiddlers Ferry and the South East Warrington Employment Area provide a total of 237.92 ha, which is marginally below the required need by around 8 ha. The Council considers that there is a strong likelihood the balance of employment land need will be met from windfall sites in existing employment locations. There is also the potential of agreement with St Helens that the additional land at Omega West should contribute to meeting Warrington's needs as detailed in the response to question 20 above.
- 27.5 The Council has considered a number of other employment sites, in particular those which were given the highest grading through the Economic Development Needs Assessment. All of these sites however have one or more significant constraints. Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites.
- 27.6 The Council is however committed to undertaking a review into Warrington's employment land needs every 5 years and in any event, well before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised
- 28. What is the basis for the inset settlements (excluded from the Green Belt) and Green Belt settlements (washed over)? Is the list of settlements in each category justified in each case?**
- 28.1 The Council does not consider there has been any material change in any of the inset or washed over Green Belt settlements that would alter the rationale for their classification following the adoption of the Local Plan Core Strategy in 2014. The Council therefore considers that the list of settlements in each category is justified.

28.2 Given the limited size of the washed over settlements and their lack of service provision, the Council does not consider that these are sustainable locations for development. There are a limited number of washed over settlements which have either been removed from the Green Belt or have had their boundaries revised as a consequence of Green Belt boundary changes in respect of the main urban area.

29. In other respects, is the approach in Policy GB1 justified, effective and consistent with national policy? Are any main modifications necessary for soundness?

29.1 The Council is confident the approach in Policy GB1 is justified, effective and consistent with national policy.

29.2 The Council is suggesting a limited number of specific Green Belt boundary changes which are detailed in the Matters Statement relating to allocation sites.

The overall approach to infrastructure

30. What are the overall infrastructure requirements as a result of the proposals in the Local Plan? How have these been established and in particular how has the Council worked with other organisations?

30.1 The approach to infrastructure requirements has been assessed initially through a detailed assessment of Settlement Profiles - Main Urban Area 2017 (O5) and Settlement Profiles - Outlying Settlements 2017 (O6) and summarised in the Area Profiles and Options Assessment Technical Note 2017 (O4). The profiles included a detailed assessment of existing infrastructure - including schools, health facilities, retail centres, other community facilities, open space, sports and recreation facilities, highways and public transport – its capacity and potential to be expanded / improved to accommodate different levels of growth.

30.2 Requirements have subsequently been updated through the Infrastructure Delivery Plan (IDP) (IN1) on an ongoing basis at each stage of plan preparation. Key requirements include education, healthcare, leisure, transport infrastructure, green infrastructure and biodiversity improvements. Detailed requirements are identified in each of the site allocation policies including the main development area policies and the outlying settlement policies.

30.3 The Council has also used a transport model to assess the level of development proposed in the Plan together with key transport infrastructure proposals. This is detailed in Transport Model Testing of the WBC Local Plan August 2021 (T1).

30.4 The Council has worked closely with internal services of the Council, including education, transport, housing, leisure, environmental health and development management and external organisations including the NHS, National Highways, Natural England and utilities providers, and will continue to do so as infrastructure requirements are kept under review through further updates to the IDP.

31 What role does the Infrastructure Development Plan have and how does it relate to the Local Plan? How will the Infrastructure Development Plan evolve over time?

31.1 The IDP aims to aid all parties in identifying and prioritising infrastructure provision as part of an integrated approach to planning and infrastructure development. Its purpose is to ensure that infrastructure delivery keeps pace with the level of growth proposed in the Local Plan. The IDP remains an essential mechanism for helping to identify funding priorities and any potential gaps. This will ensure that services can match demand and that growth is sustainable for local communities. The IDP will give a clear steer on who is responsible for implementing policies and proposals, by when and the resources that will be required.

31.2 The IDP is a 'live' document which has been updated prior to the preparation of both the UPSVLP 2021 and PSVLP 2019, and will be reviewed and monitored regularly to ensure that it includes the most up to date information. Any identified costs are based on the best available information at the time of publication, and will be subject to change during the plan period.

31.3 The Council acknowledges that Appendix 2 to the Infrastructure Delivery Plan 2021 (IN1) might be better appended to the Warrington Local Plan Viability Assessment 2021 (V2). Appendix 2 contains a number of assumptions on costs for the main development areas for the purposes of preparing the Local Plan Viability Assessment. These are proportionate in detail to the Local Plan Viability Assessment but are cautious and ensure an appropriate level of contingency prior to the actual scheme costs being worked up in detail, so as not to test the margins of viability. A higher level representation of infrastructure on these sites is contained in Appendix 1. These will be reviewed and refined as the actual scheme costs become apparent.

32. Is there a distinction between infrastructure which is essential for the proposed development to take place and desirable infrastructure?

32.1 The infrastructure requirements which the Council considers are essential to enable individual site allocations to come forward are clearly set out in the respective allocation policies.

32.2 Within the IDP there is wider infrastructure that the Council is promoting, such as certain schemes to promote walking and cycling and open space improvements which whilst not essential to bringing individual development schemes forward, are desirable in terms of the overall vision and strategic objectives of the Plan.

33. How have costs for infrastructure been established? What are the sources of funding and is this sufficiently clear? Where there is a significant funding gap, how will this be met, is this clear and is it realistic?

33.1 The costs for infrastructure have been established through working closely with internal Council services, partner services and infrastructure providers. The Council

has also worked closely with the developers promoting the Main Development Areas to establish the infrastructure costs for these sites.

- 33.2 For infrastructure schemes coming forward in the short term, costs are more certain and may reflect actual scheme costs or costs included in detailed business case documents. For infrastructure coming forward in the longer term, relevant services and external partners have utilised costs in outline business case documents, published cost sources, or have provided estimates based on professional knowledge and judgement, using specialist consultants where necessary.
- 33.3 Within the allocation policies the majority of infrastructure is intended to be funded by the developer promoting the scheme. There are however additional funding sources that the Council can access to address any funding gap, either in respect of delivering specific allocation sites or in delivering infrastructure required to support the spatial strategy of the Plan as a whole. The Council has an excellent track record of securing funding from a wide range of sources – including the Local Enterprise Partnership, Department of Transport, Department of Education, Department for Levelling Up, Housing and Communities – to deliver infrastructure in the Borough. As such, the Council considers it is realistic that that any funding gap in the delivery of infrastructure can be met.
- 33.4 The largest infrastructure scheme that is being promoted by the Council is the Western Link. It will directly enable the development of the Waterfront area and through reducing traffic levels on the existing road network, it will facilitate a greater level of development within the Town Centre and across Inner Warrington.
- 33.5 The Council remains committed to the development of the Western Link having completed outline design works in 2021. The Council has subsequently completed a Gateway Review of the scheme which has concluded that the scheme costs have increased from those within the original Outline Business Case. The Council is in dialogue with the Department for Transport regarding the funding of the Western Link as part of the Large Local Majors Programme.
- 33.6 In accordance with para 59 PPG Plan Making, the Council is confident it is able to demonstrate that there is at the least, a reasonable prospect of the scheme being delivered. In the event there is a more significant delay to the Western Link programme then the Council will of course address this through a future review of the Plan, in accordance with Updated Proposed Submission Version Local Plan Policy M1 - Local Plan Monitoring and Review. The Council is confident that there would be sufficient time to undertake a review prior to the transport impacts becoming apparent and to address any issues with the Plan's housing land supply.

34. In overall terms, is it sufficiently clear that essential infrastructure will be provided and delivered at the right time?

- 34.1 The Council considers that the infrastructure programme set out in the IDP, combined with the specific requirements of the allocation policies will ensure that

essential infrastructure will be provided and delivered at the right time. The Council will keep infrastructure requirements under review through updates to the IDP and if necessary through a review of the Plan.

Viability

N.B. specific issues relating to the viability of individual Main Development Areas and site allocations are dealt with under Matters 6 and 7

35. Is the methodology used for the Viability Assessment of the Local Plan appropriate and robust?

35.1 The Local Plan Viability Assessment 2021 (V2) has been prepared in accordance with all relevant national policy and guidance, industry recommend best practice and guidance, including the mandatory requirements specified in the RICS Professional Statement Financial Viability in Planning: Conduct and Reporting, and the approach adopted in other area-wide Local Plan Viability Assessments. As such the Council is confident the methodology used for the Viability Assessment of the Local Plan is appropriate and robust.

36. Does it provide a realistic and comprehensive assessment of revenue and costs for the Main Development Areas and site allocations over the plan period?

36.1 To inform the assumptions adopted in the viability testing, the Council's consultants undertook a thorough review of the local residential and commercial markets. They also engaged with developers promoting sites through the Local Plan process to determine appropriate assumptions for the purposes of the testing.

36.2 The market analysis was first undertaken in December 2019 / January 2020 as part of the original update to the LPVA. The draft development appraisal assumptions were published for consultation in January 2020. All responses were considered in shaping and finalising the assumptions adopted within the original update to the LPVA.

36.3 For the purposes of the Local Plan Viability Assessment 2021, given the relatively short time period since preparation of the work and assumptions in 2020, it was agreed to update the previously assumed costs and values utilising an indexed-based approach which takes account of market movements indicated by the BCIS tender price indices and the Land Registry House Price Index.

36.4 The consultants did have however seek to sense check the changes based on indexation against updated local market evidence wherever possible to further inform the assumptions and to be satisfied that the updated assumptions are realistic and market-facing. Full details and justification for the adopted inputs is provided in Section 7 of the Local Plan Viability Assessment 2021 (V2) with further narrative provided in the Local Plan Viability Assessment Addendum 2022 (V1) in response to stakeholder comments.

36.5 The consultants have tested a wide range of typologies across a number of different value areas to ensure a comprehensive assessment of revenues. Similarly, the build costs have been varied by site size and value area to ensure realism and robustness, with additional provisional cost assumptions for abnormal development costs and strategic infrastructure for further rigour.

37 Are all costs included and are the estimates of these justified? How have infrastructure requirements been factored in and how do these correspond to the Infrastructure Development Plan and costs identified in that?

37.1 All costs have been included together with an appropriate level of contingency at the plan-making stage as detailed in Section 7 of the Local Plan Viability Assessment (V2).

37.2 For the typology sites and outlying settlements, infrastructure costs primarily relate to S106 contributions and the provisional abnormal cost allowances. The S106 contributions have been calculated using the costs and formulas set out in the Council Planning Obligations SPD (SPD4), with indexation applied. There is an assumed reduction for inner Warrington and town centre sites to reflect that not all contributions will be sought for schemes with a relatively higher proportion of flats and to reflect that there is a degree of existing capacity within infrastructure within the main urban area.

37.3 For the Main Development Areas there is also a requirement for significant strategic infrastructure (eg. major new road junctions, utilities and drainage, spine roads, highway improvement schemes) to unlock each site for development.

37.4 The Council provided the consultants with estimated strategic infrastructure / abnormal costs for each of the Main Development Areas which the consultants relied on for the purposes of the assessment.

37.5 The costs have been established as detailed in the response to question 33 above and in dialogue with the relevant developers of each allocation. The costs are those that are included in Appendix 2 of the Infrastructure Delivery Plan.

38. What is the basis for the assumptions regarding the phasing of development and the timing of the need for and costs of infrastructure and are these realistic and justified?

38.1 Given the size of the typology and settlements sites they are assumed to come forward in a single phase. The build out rates for these sites are consistent with those used in the Council's Strategic Housing Land Availability Assessment. The infrastructure costs for these sites have been confirmed as detailed in the response to question 37 above.

38.2 The Main Development Areas will provide in excess of 1,000 residential units. These sites will therefore come forward in phases throughout the plan period where

individual development parcels may typically comprise approximately 250 – 300 units. This approach was supported by developers promoting these allocations.

38.2 For the purposes of the Local Plan Viability assessment, the residential Main Development Areas have been appraised based on a hypothetical scheme comprising 300 units in order to reflect a likely profile of delivery at these sites over the plan period.

38.3 Based on dialogue with the Council in respect of the likely delivery structure and payment profile for the strategic infrastructure / abnormal costs, the Council's viability consultants pro-rata'd the total costs to each hypothetical 300 unit scheme on a per plot basis for the purposes of the appraisals.

38.4 For the Main Development Areas the costs are inputted into the cash flow models using an upfront 'weighted' cash flow approach whereby the costs are assumed to be highest at commencement of development and taper off throughout the development period. This is considered to represent a reasonable assumption for large-scale urban extensions so as to seek to reflect the timely delivery of the requisite enabling infrastructure in the cash flow. This approach was supported by the developers promoting the site allocations.

39 How do the assumptions on housing delivery compare with the housing trajectory?

39.1 The assumptions on housing delivery that the consultants have used for the Local Plan Viability Assessment are consistent with those used by the Council and which have informed the Local Plan's housing trajectory. As stated in response to question 38 the assessment for the Main Development areas is based on a hypothetical scheme comprising 300 units to reflect individual phases of development.