

Warrington Local Plan EiP

Matter 3: The Spatial Strategy

On behalf of Taylor Wimpey, Bloor Homes, Lone Star Land and Mulbury (Grappenhall) Limited.

Date: 22 July 2022 | Pegasus Ref: P20-3147 / R004v2 / PL

Author: ST/RD





Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1/2	22 July 2022	RD	ST	

1. Matter 3 – The Spatial Strategy

- 1.1. Each of the Inspector's questions are listed below. We comment on those questions where we raise matters in the representations (UPS VLP 1431) to the second Regulation 19 Warrington Local Plan (WLP) (SP1).

Housing

Overall Spatial Strategy for Housing

- 1.2. Our position on the overall spatial strategy for housing is set out in our Regulation 19 representations at:

- Policy DEV1 – Housing Delivery (para 7.2 to para 7.24)
- Policy DEV2 – Meeting Housing Needs (para 7.25 to 7.39)
- Housing Land Supply Assessment (Appendix 7, 7A, 7B, 7C, 7D, 7E and 7F)

Q1. Is the strategy to maximise the development potential of the existing urban area for new housing appropriate and justified?

- 1.3. The NPPF requires the Council to explore all urban area options prior to concluding that exceptional circumstances exist to release Green Belt land. We consider the Council have satisfied this test but have not demonstrated that the potential housing land supply, will actually address housing needs and the issues of housing affordability.
- 1.4. The Council have chosen not to allocate specific smaller housing allocations in the Local Plan and therefore the urban supply identified within Warrington and the other settlements is simply a theoretical level of supply rather than representing a positively prepared policy basis for seeing these sites come forward for housing. Without such allocations, it must follow that there will be a greater level of uncertainty as to whether all of the SHLAA sites assessed will deliver.

Q2. 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?

- 1.5. At the time of our representations, we identified that the urban capacity figure set out in the WLP did not match the evidence presented in the SHLAA. The 2021 SHLAA (H4/H4a) identifies 10,965 homes between 2021/22 and 2035/36¹ and 695 homes from 2036 onwards². It is not therefore clear where the urban capacity figure of 11,785 new homes has come from, and the Council should clarify this. As such this figure has not been justified.

¹ Table 3.7 and Figure 1, H4

² Appendix 1, H4a

- 1.6. Our own Housing Land Supply Assessment (see Appendix 7, 7B and 7C of our Regulation 19 Repts) set out our position on housing land supply and identified that the number of homes from the existing urban area is substantially less than 11,785 homes.

Q3. 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?

- 1.7. Our position on exceptional circumstances is set out in our representations in response to Policy GB1 – Green Belt (para 7.64). There are exceptional circumstances to justify altering the Green Belt on a strategic and Borough-wide level.
- 1.8. Halton and St Helens both contain Green Belt, and their respective Local Plans have either released Green Belt or proposing to release Green Belt to meet their own needs³. As such, WBC, Halton Borough Council and St Helens Borough Council have agreed to meet their own objectively assessed housing need within their Boroughs⁴. There is no ability within neighbouring authorities to accommodate any of Warrington's housing needs without the need to release more Green Belt land in those locations (which would not be the most sustainable option for meeting needs arising in Warrington).

Q4. What is the basis for a flexibility allowance of 10% in terms of the housing requirement? Is this justified?

- 1.9. In our Housing Land Supply Assessment and response to **Matter 8: Housing Land Supply**, we highlight specific sites that would not come forward as set out in the Council's housing trajectory, by a significant margin. On this basis it is appropriate to include a flexibility allowance of **at least 10%** in terms of the housing requirement.
- 1.10. We note that in previous iterations of the draft Local Plan, the Council allowed for an additional uplift of 5% for the delivery of more affordable housing needs, which has not been carried through to the Submission plan. We question why this is no longer the case, as the national evidence points to worsening affordability issues.

Q5. 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?

- 1.11. Await Council's position on this.

Q6. 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?

³ Para 4.5, Statement of Common Ground (SP10)

⁴ Para 4.6, SP10

- 1.12. Warrington is by far the largest settlement within the Borough, is where the vast majority of existing households, jobs and services reside. In general terms it therefore represents a sustainable approach.
- 1.13. We note that the starting point for consideration by the Council was whether sites made a strong contribution to the Green Belt⁵. In the context of Warrington, we agree that Green Belt contribution should represent an important component of site selection. This is because the main settlement is sandwiched between the two larger conurbations of Greater Manchester and the Liverpool City Region. Separation distances between certain urban areas are therefore very tight and/or key defensible boundaries have been reached in certain directions. Given a principle purpose of Green Belt is to stop towns merging and there is a need to ensure Green Belt boundaries are durable and persist beyond the plan period, the Green Belt assessment is a pivotal component of the decision making process.
- 1.14. There are only two weak General Green Belt Parcels next to the urban area of Warrington, as identified by Figure 8 in the 2016 Green Belt Assessment (including land to the southwest of Warrington previously identified for the Garden Suburb proposals). Development in this direction would not result in town merging and can be readily defined by very strong Green Belt boundaries including the M56, M6, A50 and A49.
- 1.15. After the Green Belt assessment and the filtering out of strong performing sites, remaining sites were then assessed against the objectives of the plan and SA site assessment criteria to establish if the sites were suitable. Additional criteria were included to assess whether sites were available, and development was achievable⁶. However, it is not clear how other important considerations have been factored in.
- 1.16. For instance, the Council have an adopted Local Transport Plan that is hinged on seeking to align development growth with the delivery of a Mass Transit Network across Warrington. The LTP was subject to its own SEA and led to strategies for South West Warrington, proposals for the Garden Suburb to help deliver a Mass Transit network. However, the LTP is not cited in the Council's site selection process and there is no consideration as to how certain site will or won't address the LTPs objective in delivering a Mass Transit network. For instance, there is no evidence provided by the Council as to how the site at Thelwall Heys (or other locations) would contribute to the core objectives set by the LTP including the delivery of mass transit infrastructure to support model shift and there is no requirement in Policy MD5 for that site to do so. We consider this is a significant oversight and renders the plan unsound.
- 1.17. We have also highlighted that certain sites/parcels of land controlled by the Consortia are identified but the site assessment proforma for those parcels have not been published alongside the Submitted Local Plan (see Matter 1 statement).

⁵ Para 4.2, Development Options and Site Assessment Technical Report (March 2019) and Para 3.3, Development Options and Site Assessment Technical Report (September 2021)

⁶ Para 4.4, Development Options and Site Assessment Technical Report (March 2019) and Para 3.4, Development Options and Site Assessment Technical Report (September 2021)

Q7. 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?

- 1.18. We await to see the Council's response on this but concur that the bias towards Green Belt release around the main settlement is fully justified due to the overall scale of Warrington.
- 1.19. We question if the 801 homes afforded to the outlying settlement would actually assist in delivering key infrastructure for the main settlement but note there will be localised needs that will need to be met in these settlements.

Outlying Settlements

Q8. How were the site allocations in the outlying settlements selected, what factors were used to assess potential sites and what criteria were used?

- 1.20. No comments until we see the Council's response on this.

Q9. What evidence fed into this process e.g. Green Belt Assessment, flood risk data etc?

- 1.21. No comments until we see the Council's response on this.

Q10. How has the process been recorded and documented? What role did the SA have?

- 1.22. No comments until we see the Council's response on this.

Q11. Which options were considered, why were alternative options discounted and why were the site allocations chosen?

- 1.23. No comments until we see the Council's response on this.

Q12. Was the methodology applied to site selection appropriate and were the conclusions of the process justified?

Q13. Is the scale of housing growth in each of the outlying settlements justified?

- 1.24. We accept that some local housing needs will need to be met within the larger villages. However, we cannot see any robust evidence in terms of what local housing needs arise from these settlements and it is unclear how the Neighbourhood Planning process is going to play a role in addressing these needs (noting allocations are being made in this plan). It is also pertinent to point out that delivering a more dispersed development pattern with homes afforded to the villages and outlying locations such as Fiddlers Ferry, that this undermines the ability to deliver required strategic infrastructure in Warrington, where the vast majority of housing demand will be generated.
- 1.25. We note the Council has used the approximate capacity of 1,000 homes to be allocated to the outlying settlements. This is based on a benchmark of 10% growth in each settlement, which the Council considers can be accommodated by existing infrastructure (with

expansion of existing infrastructure if necessary) and which will not impact on the overall character of the settlement⁷.

- 1.26. It cannot be confirmed that the Council's approximate capacity of 1,000 homes based on 10% growth is correct because details on the existing number of homes in each of the outlying settlements has not been provided.
- 1.27. Moreover, the overall approach by the Council is based on a housing requirement of 816 dpa which we take serious issue with.

Adjacent to the main urban area

Q14. 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?

- 1.28. Await Council's comments.

Q15. What evidence fed into this process e.g. Green Belt Assessment etc?

- 1.29. Await Council's comments.

Q16. How has the process been recorded and documented? What role did the SA have?

- 1.30. We await to see the Council's response to this. However, we have addressed this in detail in our Matter 1 Statement in relation to the options assessed for the SE Warrington Urban Extension and highlighted that not all options put to the Council were tested through the SA process, including the options that seeks to utilise Broad Lane as a distinct allocation boundary and promotes safeguarded land between Broad Lane and the A50 so as to have a long term plan in place to deliver the necessary highway and mass transit infrastructure.
- 1.31. It is our understanding that the Council's consideration of Main Development Areas is recorded and documented in:
- Development Options and Site Assessment Technical Report (March 2019) **(O3)**
 - Development Options and Site Assessment Technical Report (September 2021) **(O1/O2)**
- 1.32. These documents provide details of the Council's consideration of Main Development Areas at the time of the first and second Regulation 19 consultations. It is the process set out in these documents that we refer to in response to **Q17** and **Q25**.
- 1.33. Detailed site proforma of all sites that have been assessed is provided in the:
- Site Profiles for Local Plan Site Allocations (June 2022) **(CD02)**

⁷ Para 2.22, O1

- Site Profiles for Local Plan Omission Sites (June 2022) (CD03)

1.34. These documents provide a summary of how sites have been considered during the SA process and in other evidence base documents.

Q17. Which options were considered, why were alternative options discounted and why were the Main Development Areas (involving Green Belt release) chosen?

Garden Suburb

1.35. Our position with regards to the Garden Suburb is set out in our representations:

- The section on the Warrington Garden Suburb (Section 3)
- Planning Background to Warrington Garden Suburb (Appendix 3, 3A, 3B, 3C, 3D, 3E and 3F)
- Housing Land Supply Assessment (Appendix 7, 7A, 7B, 7C, 7D, 7E and 7F)

1.36. We also refer to the Garden Suburb in the following:

- Matter 1: Procedural / Legal Requirements
- Matter 2: The Duty to Co-operate
- Matter 6b: Main Development Area: South East Warrington Urban Extension
- Matter 6f: Main Development Area: South East Warrington Employment Area

1.37. At the time of the first Regulation 19 WLP (PVLPI), the Council engaged with developers with land within the Garden Suburb and infrastructure providers to confirm the required infrastructure to support the allocation and to demonstrate that the allocation as a whole is viable and can be delivered⁸. This consortia and Pegasus Group were party to some of those discussions and evidence was prepared by WSP for a larger landowner group.

1.38. The Council have now discounted the Garden Suburb as an option because they consider the average build rate of 300dpa to be overly optimistic and because it has not been possible to demonstrate that the substantial infrastructure required to support the allocation could be delivered in a timely manner, coordinated across all landowners⁹.

1.39. However, nothing has changed since the first Regulation 19 WLP for the Council to now come to a different conclusion.

1.40. Build out rates and infrastructure delivery were fully explored in our representations, which demonstrate that there is simply no reason for the Council to assume that the average build rate of 300 homes per annum cannot be achieved and that the infrastructure

⁸ Stated at para 3.32 of O3

⁹ Stated at para 4.8 of O1

required to support the allocation could not be delivered in a timely manner, if the Garden Suburb was allocated in the WLP.

- 1.41. Furthermore, in their consideration of the options the Council have failed to take account of the fact that the Garden Suburb can:
- Provide the necessary east west links between the A49 and A50 and public transport improvements
 - Provide the Mass Transit Route throughout this part of Warrington, as envisaged by the adopted Warrington Local Transport Plan
 - Create a centrally located District / Neighbourhood Centre and Country Park around Grappenhall Heys
 - Provide a large area of compensation land with greater public access to open countryside and ecological enhancements

1.42. The Council have failed to acknowledge that the Garden Suburb has very strong boundaries defined by M56, Grappenhall Lane and the A50.

1.43. As such, the decision of the Council to not consider the Garden Suburb as an option has not been justified.

South East Warrington Urban Extension

1.44. Our position with regards to South East Warrington Urban Extension is set out in our representations in response to Policy MD2 – South East Warrington Urban Extension (para 8.5 to para 8.14).

1.45. We also set out the issues with the South East Warrington Urban Extension in the following:

- **Matter 1: Procedural / Legal Requirements**
- **Matter 2: The Duty to Co-operate**
- **Matter 6b: Main Development Area: South East Warrington Urban Extension**

1.46. The Council's unfounded concerns about the Garden Suburb prompted them to consider four options for the smaller South East Warrington Urban Extension instead. We take major issue with the fact that in their consideration of the options for South East Warrington Urban Extension the Council did not consider infrastructure delivery which was one of the reasons for discounting the Garden Suburb.

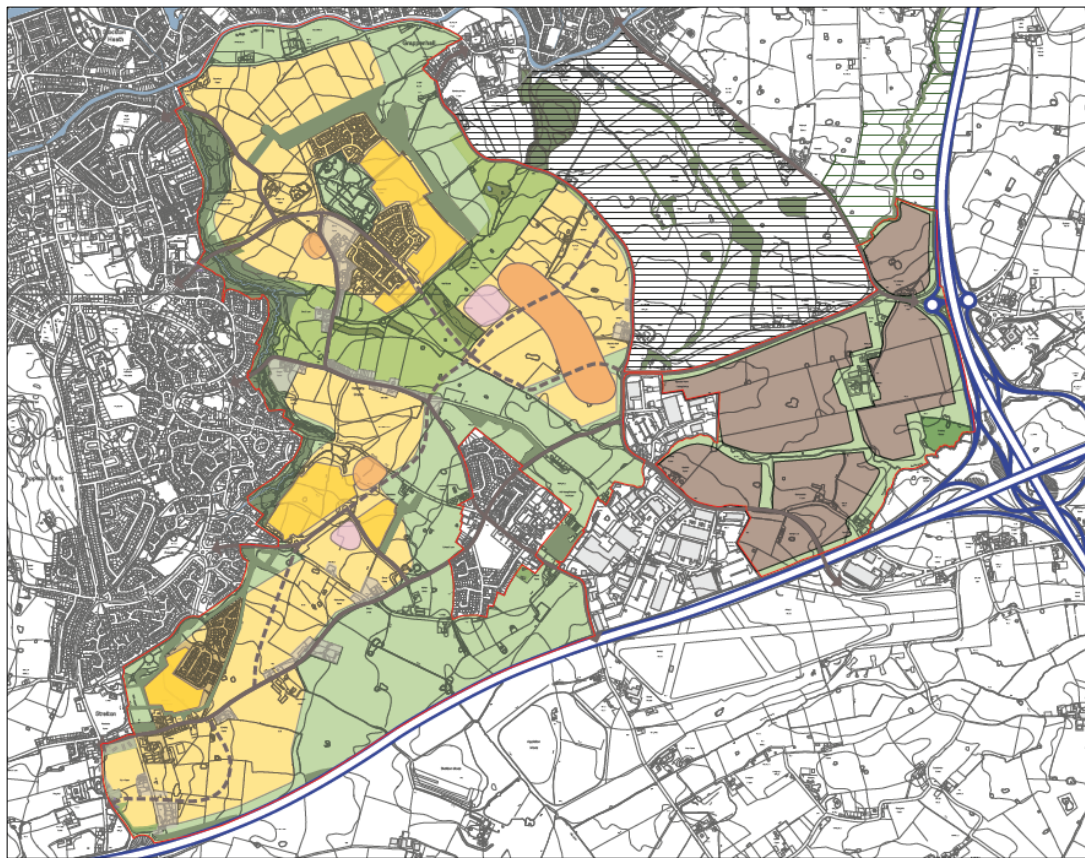
1.47. The Council also claim they have considered but discounted an additional option that would extend from Grappenhall Heys in the north, extending eastwards to the A50. As stated at paragraph 4.25 of O1:

'The Council also considered an option that would extend from Grappenhall Heys in the north, extending eastwards to the A50 but concluded that this option was also unreasonable. In considering likely revised Green Belt boundaries for this option, the Council concluded it would result in excessive land being removed from the Green

Belt and raise deliverability issues given the number of landownerships this would include. It could also impact on Grappenhall Village, a washed over Green Belt settlement containing a Conservation Area and a number of heritage assets. A consequence of this option is that Grappenhall Village would be removed from the Green Belt and would become part of the main urban area of Warrington.

1.48. The Council have not been any more explicit about this additional option or provided a plan.

1.49. As part of our Regulation 19 consultation, we presented the following option (See Option 2 plan at Appendix 3E – copied below).



1.50. Even though this is not the same as the Council's 'other' option cited above, our position is that it would not adversely impact on the village of Grappenhall and its associated conservation area setting. In previous iterations of the Local Plan, the Council clearly consider Green Belt boundary changes in this location to be justified subject to the completion of a village character assessment.

1.51. Indeed, as part of any masterplanning process (see our masterplan at Appendix 2 of our Regulation 19 representations), Grappenhall village could be surrounded by open space, country park or retained agricultural fields should the setting of the conservation area warrant it, particularly if the robust 60m+ wide woodland belts around the larger Greppenhall Heys were used to define the extent of that larger village. Such an approach would clearly align with paragraph 144 of the NPPF.

- 1.52. Under our Option 2, Broad Lane would also act as a secure defensible boundary and this option would not result in excessive land being removed from the Green Belt (as the Council claim) since more land is required to meet local housing needs / the housing requirement than currently identified in the WLP and it would deliver a genuine mass transit route link through to the SE Employment area by connecting to the Grappenhall Lane and Broad Lane roundabout.
- 1.53. Ultimately, the Council have failed to consider that our Option 2 as a reasonable alternative to the Garden Suburb / South East Warrington Urban Extension. This needs to be robustly addressed.
- 1.54. We strongly object to the the South East Warrington Urban Extension, consider that is unsound, and consider that it should be removed from the WLP (along with the South East Warrington Employment Area) and replaced with the Garden Suburb, or our Option 2, as an allocation.

Fiddlers Ferry

- 1.55. We addressed the Fiddlers Ferry allocation in the representations in relation to:
- The Habitat Regulations Assessment (HRA) (para 4.9 to 4.12).
 - Ecological networks (para 7.101 to para 7.104)
 - Flood risk (para 7.112)
 - Policy MD3 – Fiddlers Ferry (para 8.15 to para 8.25)
- 1.56. We also set out the issues with the South East Warrington Urban Extension in the following:
- Matter 1: Procedural / Legal Requirements
 - Matter 2: The Duty to Co-operate
 - Matter 6c: Fiddlers Ferry
- 1.57. The Council note that although the substantive operational area of the power station is being promoted for employment uses, SSE (the owners at that time) 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, to cross subsidise the remediation of the power station. It therefore appears that the release of Green Belt land for housing to the east of the power station is to cross subsidise the remediation of the power station¹⁰.
- 1.58. The Council also note that over the longer term, there is also the potential for residential development to the south of the railway line on land currently within the Green Belt which has been used for fly ash deposits, as part of a wider development opportunity which would retain and enhance the existing lagoons as a recreational and ecological resource¹¹.

¹⁰ O1, para 4.13

¹¹ Ibid

We strongly object to this approach as it does not provide justification for the release of Green Belt in this location.

Q18. Was the methodology applied appropriate and were the conclusions of the process justified?

- 1.59. Noting our comments in response to **Q17** and our issues with the South East Warrington Urban Extension and Fiddlers Ferry, the methodology applied to the site selection process was not appropriate and the conclusion of the process has not been justified.
- 1.60. There is no justification to not consider the Garden Suburb, or to discount our Option 2 as a Main Development Area in favour of the South East Warrington Urban Extension and South East Warrington Employment Area.

Employment Land

Q19. 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?

- 1.61. No comments until we see the Council's response on this.

Q20. 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?

- 1.62. No comments until we see the Council's response on this.

Q21. 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?

- 1.63. Our position on exceptional circumstances is set out in our representations in response to 'Policy GB1 – Green Belt' (para 7.64). There are exceptional circumstances to justify altering the Green Belt on a strategic and Borough-wide level.

Q22. 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?

- 1.64. See response to **Q25**.

Q23. What evidence fed into this process e.g. Economic Development Needs Assessment, Green Belt Assessment etc?

- 1.65. No comments until we see the Council's response on this.

Q24. How has the process been recorded and documented? What role did the SA have?

- 1.66. No comments until we see the Council's response on this.

Q25. Which options were considered, why were alternative options discounted and why were the Main Development Areas for employment chosen?

South East Warrington Employment Area

- 1.67. We addressed the South East Warrington Employment Area allocation in the representations in relation to:
- Accessibility and its isolated location (para 7.44 and para 7.66)
 - Its failure to deliver sustainable transport links and other sustainable transport modes (para 7.81)
 - Policy MD6 – The South East Warrington Employment Area (para 8.35 to para 8.39)
- 1.68. We also set out the issues with the South East Warrington Employment Area in the following:
- Matter 1: Procedural / Legal Requirements
 - Matter 2: The Duty to Co-operate
 - Matter 6f: South East Warrington Employment Area
- 1.69. In summary, the identified South East Warrington Employment Area is unsound as it cannot by itself or in conjunction with the SEWUE deliver:
- The necessary east west links between the A49 and A50 and public transport improvements that connect the South East Warrington Employment Area to new communities
 - A Mass Transit Route throughout this part of Warrington, as envisaged by the adopted Warrington Local Transport Plan

Q26. Was the methodology applied appropriate and were the conclusions of the process justified?

- 1.70. Noting our comments in response to **Q25** and our issues with the South East Warrington Employment Area, the methodology applied to the site selection process was not appropriate and the conclusion of the process has not been justified.
- 1.71. There is no justification to discount the Garden Suburb, or our Option 2, as a Main Development Area in favour of the South East Warrington Urban Extension and South East Warrington Employment Area.

The Green Belt

Q27. Should the Local Plan identify safeguarded land? If so, where and for what purpose?

- 1.72. The Local Plan should include safeguarded land to meet longer-term development needs stretching well beyond the plan period. The former Garden Suburb allocation, or our Option

2, should be reinstated in the WLP. Both these options include safeguarded land which can meet the longer-term housing needs beyond the plan period.

Q28. 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?

- 1.73. Our position on the washed over villages is set out in our representations in response to Policy GB1 – Green Belt (para 7.69 to 7.71).

Q29. In other respects, is the approach in Policy GB1 justified, effective and consistent with national policy? Are any main modifications necessary for soundness?

- 1.74. Our position on the soundness Policy GB1 – Green Belt is set out in our representations in response to 'Policy GB1 – Green Belt' (para 7.65 to 7.66). In summary, the approach to Policy GB1 – Green Belt is not justified, effective and consistent with national policy on the basis that:

- The identified Green Belt release at South East Warrington Urban Extension is unsound (see response to **Q17** and our response to **Matter 6b: Main Development Area: South East Warrington Urban Extension**)
- The identified Green Belt release at South East Warrington Employment Area would result in an isolated employment area that will fail to deliver suitable public transport links and other sustainable transport modes (see response to **Q25** and our response to **Matter 6f: Main Development Area: South East Warrington Employment Area**)
- The identified Green Belt release for the housing element at Fiddlers Ferry Power Station is unsound (see response to **Q17** and our response to **Matter 6c: Main Development Area: Fiddlers Ferry**)
- The identified Green Belt release at Thelwall Heys is unsound (see para 8.28 to 8.34 of representations)
- The exceptional circumstances for Green Belt release at the various villages has not been fully justified (see response **Q28**)

The Overall Approach to Infrastructure

Q30. 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?

- 1.75. We note that two IDPs have been provided with the submitted Local Plan evidence, including a 2019 (IN2) and 2021 version (IN1). IN2 relates to the first Regulation 19 WLP and includes the wider Garden Suburb proposal. IN1 relates to the second Regulation 19 WLP and includes the South East Warrington Urban Extension.
- 1.76. We have summed all of the infrastructure requirements and funding gap set for the Garden Suburb proposal in IN2 and the South Warrington Urban Extension and Employment area in IN1.

- 1.77. The funding gap for delivering the Garden Suburb was identified in the IDP 2019 as £359,520,000. **Based on the delivery of 4,170 homes over the plan period this equates to £86,215 per home** (accounting for the Homes England consented sites). **Based on the delivery of 6,470 homes during and beyond the plan period, this equates to £55,567 per home** (excluding the Homes England consented sites).
- 1.78. By comparison, the funding gap for delivering the South East Warrington Urban Extension and Employment Area in the IDP 2021 is £230,734,470. **Based on the delivery of 2,400 homes over the plan period this equates to £96,139.36 per home**. **Based on the delivery of 4,200 homes during and beyond the plan period, this equates to £54,936.78 per home**.
- 1.79. In reality, the landowner group demonstrated that the required infrastructure could be delivered for a lot less through informal submissions to the Council by WSP during 2019/2020 and all of the necessary local highway, education, open space and community facilities could be delivered on land controlled by the wider landowner group. Notwithstanding this, based on the Council's evidence, the funding gap for the Garden Suburb is significantly less (£86,215.83 per home), than the funding gap for the South East Warrington Urban Extension (£96,139.36 per home) over the plan period. Ultimately, the larger Garden Suburb is in a better position to deliver a better specification of infrastructure (i.e. all of the Mass Transit routes, a new Secondary School, park and ride facility and a Country Park) because it provides all of the land necessary for this and is capable of delivering it all for less cost per home.
- 1.80. The Council have stated through the SA and the Site Options assessment that they discounted the Garden Suburb as an option because they considered that it was not possible to demonstrate delivery of the infrastructure required in a timely manner. However, that is not evidenced or true.

Q31. 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?

- 1.81. Await Council's comments.

Q32. Is there a distinction between infrastructure which is essential for the proposed development to take place and desirable infrastructure?

- 1.82. Await Council's comments.

Q33. 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?

- 1.83. See response to Question 30.

Q34. In overall terms, is it sufficiently clear that essential infrastructure will be provided and delivered at the right time?

- 1.84. Essential infrastructure will not be delivered at the right time on the basis that the South East Warrington Urban Extension and South East Warrington Employment Area will not provide:

- The necessary east west links between the A49 and A50 and public transport improvements that connect the new communities to the South East Warrington Employment Area
- A Mass Transit Route throughout this part of Warrington, as envisaged by the adopted Warrington Local Transport Plan Policy (including scope for a Park and Ride Facility towards Junction 20, M6 delivered on Taylor Wimpey controlled land).
- A centrally located District / Neighbourhood Centre and Country Park around Grappenhall Heys (which can be delivered

Viability

Q35. Is the methodology used for the Viability Assessment of the Local Plan appropriate and robust?

1.85. No comments until we see the Council's response on this.

Q36. Does it provide a realistic and comprehensive assessment of revenue and costs for the Main Development Areas and site allocations over the plan period?

1.86. No comments until we see the Council's response on this.

Q37. 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?

1.87. No comments until we see the Council's response on this.

Q38. 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?

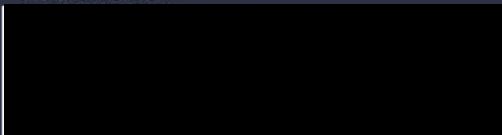
1.88. See response to Question 30.

Q39. How do the assumptions on housing delivery compare with the housing trajectory?

1.89. No comments until we see the Council's response on this.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Manchester



Offices throughout the UK & Ireland

Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE



All paper sources from sustainably managed forests

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office:

We are ISO certified 9001, 14001, 45001



Pegasus_Group



pegasusgroup



Pegasus_Group

PEGASUSGROUP.CO.UK