

## **EiP Statement**

# **Warrington Updated Proposed Submission Version Local Plan 2021-2038 (September 2021)**

## **Bellway Homes (Manchester)**

### **Representor ID UPSVLP 0434 – Deacons Close, Croft**

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**Our ref** 64788/02/SPM

**Date** July 2022

#### **Subject Matter 3: The Spatial Strategy**

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### **1.0 Introduction**

- 1.1 This Hearing Statement has been prepared by Lichfields on behalf of Bellway Homes (Manchester) [Bellway] (Respondent No: 0434) in relation to Matter 3 (The Spatial Strategy). This Statement has been written in respect of Bellway's land assets in Warrington and focusses on the site at Deacons Close, Croft, allocated in the Warrington Updated Proposed Submission Version Local Plan 2021-2038 (September 2021) [WUPSVLP] (Policy OS1 – Croft).
- 1.2 This Statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 3 Examination in Public [EiP] hearing sessions on the Spatial Strategy.
- 1.3 Bellway has previously submitted representations in relation to WUPSVLP Regulation 19 consultation stages of the Plan in support of the site and concerning the overall strategy and other proposed policies.
- 1.4 Separate statements will be submitted in respect of the following Matters:
- 1 Matter 7a – Site allocation – Croft; and
  - 2 Matter 8 – Housing land supply.
- 1.5 This Statement expands upon Bellway's previous representations made on the WUPSVLP and focuses on the Inspector's specific issues and questions. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework [the NPPF] and the National Planning Practice Guidance [Practice Guidance].
- 1.6 Alongside the land at Deacons Close, Croft (Policy OS1 – Croft) Bellway is also promoting additional land at Tanyard Farm (Policy OS5 – Rushgreen Road) and Land at Golborne Road (Policy OS6 – Land to the north of Winwick) to contribute towards the council's

requirement for new homes in the Borough. Bellway supports these allocations within the WUPSVLP.

## 2.0 Questions: Overall Spatial Strategy

### Housing

*Question 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?*

2.1 Yes.

2.2 Bellway considers that the Council's evidence demonstrates that exceptional circumstances exist to justify changes to Green Belt boundaries. The Council has clearly considered the other reasonable options for meeting the minimum number of homes required over the plan period. This exercise has concluded that the Council has fully maximised the capacity of the urban area and appropriate brownfield sites, and no neighbouring authorities are able to meet any of the borough's unmet housing needs through the Duty to Cooperate.

2.3 Consequently, the Council has fully demonstrated that it does not have enough non-Green Belt land to meet these needs and is reliant on the release of such land to meet its housing requirements. It is considered that the need for housing, and the benefits that arise from its delivery, and the harm that would arise from not meeting those identified needs, amount to exceptional circumstances justifying a review of Green Belt boundaries and the release of land from the Green Belt. This approach is consistent with many of Warrington's neighbours (Cheshire East, Halton and St Helens) who have all released Green Belt sites to meet their identified development needs. These authorities' plans have all been found at Examination.

*Question 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?*

2.4 The Development Options and Site Assessment Technical Report (§4.1-4.2) states that the Council has assessed options that are within a range of 5% above and 5% below the 10% flexibility benchmark when considering the potential options for Green Belt release. It claims that this ensures that sufficient flexibility is provided within the land supply, but without resulting in the loss of excess amounts of Green Belt.

2.5 From the information provided in the WUPSVLP and Development Options and Site Assessment Technical Report, we have assumed that capacity for 4,821 dwellings has been removed from the Green Belt to reflect the Council's preferred options (from its two stage options assessment). These were:

- 1 **Stage One (High Level Green Belt Release Options):** The Council's preferred option was: "Majority of Green Belt Release accommodated adjacent to main urban

*area with ‘incremental growth’ in outlying settlements” (Council’s Development Options and Site Assessment Technical Report (2021), (§2.20-2.37)*

- 2 **Stage Two (Options for the Urban Area):** The Council’s preferred option (Option 3) was *“An urban extensions to the south east of Warrington of around 2,400 homes, development of Fiddlers Ferry opportunity site for 1,300 homes & development at Thelwall Heys of 310 homes.* (Council’s Development Options and Site Assessment Technical Report (2021), (§4.34-4.47)

- 2.6 The capacity from these areas and from Green Belt sites in outlying settlements (801 dwellings), totals 4,821 dwellings.

*Question 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?*

- 2.7 The WUPSVLP [§3.41 to §3.4.16] sets out the exceptional circumstances sought by the Framework [§140] to justify the release of Green Belt land which includes exceptional circumstances for each area, including the outlying settlements.

- 2.8 The Council has examined all other reasonable options for meeting its identified housing need for development and concluded that there is not enough brownfield land or land in neighbouring authorities (through its Duty to Co-operate) to meet its needs. Green Belt release in order to promote sustainable patterns of development is therefore an appropriate strategy, taking into account the reasonable alternatives identified by the Council, and based on the evidence available to the Council.

- 2.9 The Council proposed three options for the distribution of housing for Green Belt release<sup>1</sup>. This included:

- 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

- 2.10 The Council considered that Option 2 performed the best against the plan’s objectives, concluding that<sup>2</sup>:

*“Focusing the majority if 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.”*

<sup>1</sup> Development Options and Site Assessment Technical Report (September 2021)

<sup>2</sup> Development Options and Site Assessment Technical Report (September 2021)

- 2.11 Bellway agrees that an exceptional circumstances case has been demonstrated and supports the Council's decision to progress Option 2, resulting in the release of Green Belt land around the outlying settlements including Croft, which will increase housing choice and support the vitality and viability of local services, whilst ensuring the character of the respective settlement is maintained [WUPSVLP 3.3.14].

*Question 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?*

- 2.12 The housing allocations proposed within the WUPSVLP are distributed across the remaining urban capacity identified, land adjacent to the urban area and outlying settlements (including Croft).
- 2.13 The urban capacity comprises 1,200 homes at the site at Peel Hall (Policy MD4: Land at Peel Hall), a large greenfield site. No alternative sites of a comparable nature within the urban areas were identified that warranted allocation. The remaining capacity is therefore split between Green Belt release between land adjacent to the main urban area and outlying settlement.
- 2.14 Under preferred Option 2<sup>3</sup>, the Council used an approximate capacity of 1,000 homes to be allocated to the outlying settlements. This is based on 10% growth benchmark in each settlement, which the Council considers can be accommodated by existing infrastructure and which will not impact on the overall character of each of the outlying settlements.
- 2.15 From the sites submitted to the Council to be considered for Green Belt release, land for the provision of 801 homes was identified. In line with the Council's Sustainability Appraisal [SA] (August 2021), broadly speaking a higher number of units are directed to Lymm and Culcheth, however each of the outlying settlements are capable of supporting incremental growth, including within Croft.
- 2.16 Having confirmed the capacity of the existing urban area and identified the sites to be allocated in the outlying settlements, the Council identified that the remaining balance of Green Belt release needed to be accommodated adjacent to the main urban area in accordance with the Plan's proposed spatial strategy.
- 2.17 The proposed distribution of housing allocations, particularly by allocating sites in outlying settlements, will help to promote sustainable development in rural areas, by enhancing or maintaining their vitality in accordance with the NPPF [§79].
- 2.18 Overall, Bellway agrees with the approach taken to the distribution of housing allocations.

## **Outlying Settlements**

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

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<sup>3</sup> Development Options and Site Assessment Technical Report (September 2021)

- 2.19 To determine the most appropriate sites for Green Belt release, the Council undertook an assessment of sites submitted to the Council as part of a Call for Sites exercise (2017). Sites making a strong contribution to the Green Belt and sites located within Flood Zone 3b were initially discounted.<sup>4</sup> The remaining sites were then assessed against a set of criteria relating to performance against the Plan's Objectives and SA / Strategic Environmental Assessment [SEA] site assessment criteria to establish that the sites were 'suitable'. The remaining sites were then identified as meeting the required level of development for the proposed spatial option of 'incremental growth' in the outlying settlements.
- 2.20 The 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.
- 2.21 The site at Deacons Close, Croft was originally considered in the first part of Green Belt Site assessments published in October 2016 and was identified as offering a 'moderate' contribution to the Green Belt. The Site was then assessed in detail in July 2017 (ref: R18/P2/056) where the overall assessment was weak. It was included within subsequent summary and consolidating reports on the basis of this assessment.
- 2.22 It was determined the site to be suitable for development.<sup>5</sup> The site is considered to be a sustainable location with access to a range of shops, services and facilities within walking distance and is well served by public transport. The report concludes that the site is achievable as it is in an area of moderate viability and there are no known abnormal development costs. In addition, the site was considered by the Council within their Green Belt Site Selection Implications of Green Belt Release Report (August 2021), where the site was determined to make a weak contribution to the Green Belt and development of the site would not harm the overall function and integrity of the Green Belt around Croft. The Green Belt Site Selection Implications of Green Belt Release Report (August 2021) states that the majority of the site is currently in use as Heathcroft Stud (equestrian use), therefore on the whole development would not represent encroachment into the countryside. Consequently, the site's overall contribution to the green belt has been amended from a moderate to weak.
- 2.23 Bellway continues to support the allocation of sites within outlying settlements, including the site at Deacons Close, Croft. The site provides a sustainable location for residential development. The release of smaller sites such as this will help to frontload the delivery of much-needed new housing within the early part of the plan period and will meet the clear and identified need for the release of Green Belt Land to meet the identified need, without harming the functionality of such land around Croft.
- Question 9: What evidence fed into this process e.g. Green Belt Assessment, flood risk data etc?*
- 2.24 The key evidence that supports the allocation of sites within the outlying settlements in the WUPSVLP is the Green Belt Site Selection Implications of Green Belt Release (August

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<sup>4</sup> Development Options and Site Assessment Technical Report (September 2021)

<sup>5</sup> Proposed Submission Version Local Plan Site Assessment Proformas (2019)

2021), the SA Report (August 2021), the Level 1 Strategic Flood Risk Assessment [SFRA] (2018), the Transport Model (2021) and the Heritage Impact Assessment for the Outlying Settlements (2021). Alongside this, the Council has also produced a combined report which collates all the previous Green Belt assessment work into the Green Belt Site Assessments Collated Report (September 2021).

2.25 However, this Green Belt evidence base does not provide a wholesale review of the Green Belt in Warrington and instead, only focusses on the sites which are proposed for allocation within the WUPSVLP.

2.26 Bellway continues to fully support the assessment of the site which establishes the removal of the site at Deacons Close, Croft from the Green Belt as proposed in Policy GB1, Policy OS1 – Croft and as identified on the Proposals Map. The Council’s Green Belt Site Selection Implications of Green Belt Release concludes that the site at Deacons Close, Croft:

*“...currently makes a weak contribution to Green Belt purposes. Overall, development of the site would not represent encroachment into the countryside as the majority of the site is currently in use as Heathcroft Stud (equestrian use) therefore the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Croft. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries”*

2.27 Additionally, the majority of the criteria within the Site Appraisal Framework, against which all sites have been tested against in the SA, are scored either dark green: ‘promote sustainable growth’ or light green: ‘unlikely to have a major impact on trends’ confirming the site at Deacon Close’s high sustainability credentials. The SFRA confirms that the site is situated in Flood Zone 1, and therefore at low risk of flooding and the Heritage Impact Assessment concludes that the site makes little to no contribution to surrounding listed buildings. As a result, its allocation for development is unlikely to result in harm to the significance of surrounding assets.

2.28 Therefore, the methodology used by the Council to allocate sites has been robust and the allocation of Land at Deacons Close within the WUPSVLP is fully justified.

*Question 11: Which options were considered, why were alternative options discounted and why were the site allocations chosen?*

2.29 As set out in Question 8, the Council concluded there is not enough Brownfield land nor land in neighbouring authorities to meet its needs. Therefore, Green Belt release to promote sustainable patterns of development was identified as the only option available to the Council. From this, the Council considered three high-level spatial strategies for the distribution of new homes within Warrington.

2.30 It was concluded that an approach focused entirely on the main urban area of Warrington would not provide a flexible approach to housing and could exclude the outer settlements from any benefits associated with growth. Nor would such an approach meet identified needs in those outer settlements. Conversely, an approach that dispersed development away from the urban areas would not be as likely to achieve the Plan objectives relating to



regeneration, accessibility and economic growth. It was therefore concluded by the Council that incremental growth in outlying settlements would be the most balanced approach.<sup>6</sup>

- 2.31 Bellway supports the allocation of the Land at Deacons Close within the WUPSVLP, which, as evidenced within §10.6.3 *“performed well in terms of the assessment against the objectives of the Local Plan, the requirements of the Government’s NPPF and the Local Plan’s SA”*

*Question 12: Was the methodology to site selection appropriate and were the conclusions of the process justified?*

- 2.32 Bellway agrees with the methodology applied to site selection and the conclusions of the process, as described in Section 3 of the Council’s Development Options and Site Assessment Technical Report (September 2021).
- 2.33 As evidenced in Question 9, the methodology has been fully justified by the conclusions of a wide range of technical assessments. This has resulted in a suite of site allocations that are both deliverable and developable, and will successfully contribute to the sustainable development of the borough, including the outlying settlements.
- 2.34 The conclusions of the process is therefore justified, and the allocation of Land at Deacons Close should be supported.

*Question 13: Is the scale of housing growth in each of the outlying settlements justified?*

- 2.35 The WUPSVLP sets out the spatial strategy for Warrington, which has been progressed based on Option 2, as set out within the Council’s Development Options and Site Assessment Technical Report (September 2021) and selected based on the Council’s Preferred Development Option Regulation 18 Consultation, undertaken in July 2017. The strategy includes the ‘incremental growth’ across the outlying settlements of around 800 homes. This will see a minimum of 801 homes delivered on allocated sites to be removed from the Green Belt adjacent to outlying settlements with a minimum of 75 homes delivered in Croft. The Council’s Settlement Profiles – Outlying Settlements report (July 2017) [O6] identifies that Croft is a sustainable location to accommodate ‘incremental growth’, with increased opportunities for local facilities and services to thrive and grow as a result of this site allocation in accordance with the NPPF [§79] Consequently, Bellway fully supports the scale of housing growth proposed in Croft.

## **The Green Belt**

*Question 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?*

- 2.36 The WUPSVLP [§5.1.20] provides a definition of ‘inset’ and ‘washed over’ settlements:

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<sup>6</sup> Development Options and Site Assessment Technical Report (September 2021)

*“The larger settlements and those which provide a greater number of services are ‘inset’ from the Green Belt recognising the potential for their sustainable growth. Smaller settlements are ‘washed over’ by the Green Belt with greater restricted on development.”*

- 2.37 Policy GB1 (Green Belt) defines Croft as an ‘inset settlement’ (that is excluded) from the Green Belt. As demonstrated in the Council’s Settlement Profiles – Outlying Settlements report (July 2017) [O6], Croft benefits from a number of local community services and facilities, including 2 primary schools; a secondary school; a village centre offering a range of shops and services, including a convenience store and two public houses; and community facilities including a village hall and youth centre.

Therefore, Croft is a sustainable location to deliver much-needed new housing, which justifies its designation as an Inset Settlement. Within Croft, the proposed allocation at Land at Deacons Close should be considered the most sustainable and deliverable, given its location adjacent to the existing settlement boundary to the west, offering an array of key services and public transport options in close proximity to the site. The proposed Green Belt boundary amendments to incorporate this site allocation will result in a logical southern boundary defined by an existing hedge lined footpath, and existing field boundaries to the north and east will be strengthened to the north and east of create a recognisable boundary.

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

- 2.38 Policy GB1 is based on amending the Borough’s Green Belt boundaries. As stated in the NPPF [§140], Green Belt boundaries should only be altered where exceptional circumstances exist. As mentioned above in this report [§2.2-§2.3], Bellway considers that the Council’s evidence demonstrates that exceptional circumstances exist to justify changes to Green Belt boundaries and consequently, policy GB1 is justified, effective and consistent with national policy.

**Word Count: 2,865**