

Warrington Local Plan EiP

Matter 3: The Spatial Strategy

On behalf of Taylor Wimpey (Respondent Ref Number: 1427)

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1. Matter 3 – The Spatial Strategy

- 1.1. Each of the Inspector's questions are listed below. Our position is set out in our representations to the second Regulation 19 Warrington Local Plan (UPS VLP 1427). We raise comments on pertinent or outstanding matters in direct response to the questions.

Housing

Overall Spatial Strategy for Housing

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

- 1.2. By relying heavily on the capacity of the existing urban area, it has not been demonstrated that the strategy will meet objectively assessed housing needs.

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?

- 1.3. It is not clear where the urban capacity figure of 11,785 new homes has come from. The Strategic Housing Land Availability Assessment 2021 and Appendix (H4/H4a) identifies 10,965 homes between 2021/22 and 2035/36¹ and 695 homes from 2036 onwards².

- 1.4. Also, our housing land assessment and response to **Matter 8: Housing Land Supply**, highlights that the urban capacity 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?

- 1.5. No comment.

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

- 1.6. Our housing land assessment and response to **Matter 8: Housing Land Supply**, highlights specific sites will 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.

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 H4, Table 3.7 and Figure 1

² H4a, Appendix 1

1.7. No comment.

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?

1.8. More sites are required to be released from the Green Belt on the edge of the main urban area because:

- The housing requirement should be higher than the local housing need figure of 816 dwellings per annum (see response to **Matter 4: Housing Need and the Housing Requirement**)
- The sites chosen to deliver this high-level option will not deliver as the Council expect (see our housing land assessment and response to **Matter 8: Housing Land Supply**)
- Fiddlers Ferry is not a sound allocation (see response to **Matter 6c: Main Development Area: Fiddlers Ferry**)

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?

1.9. No comment.

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?

1.10. No comment.

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

1.11. No comment.

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

1.12. No comment.

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

1.13. No comment.

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

1.14. No comment.

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

1.15. No comment.

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?

1.16. No comment.

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

1.17. No comment.

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

1.18. No comment.

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

1.19. The land put forward by Taylor Wimpey at Stocks Lane, Penketh (the site) has been considered in the Site Profiles for Local Plan Omission Sites (June 2022) (**CD03**) and given the reference 'Omission site profile: 37 (Site Ref: R18/138 and R18/P2/124)'. It is our understanding that the Council's decision to not release this site from the Green Belt and allocate for residential development is recorded in that document and it is on that basis we make the following comments.

Green Belt Assessment Collated Report (September 2021)

1.20. The Site Profiles for Local Plan Omission Sites (June 2022) cross references the Green Belt Assessment Collated Report (September 2021) (**GB4**) which finds that the site makes an overall strong contribution to the purpose of the Green Belt³. We do not consider that the site makes an overall strong contribution to the purpose of the Green Belt and take major issue with the Green Belt Assessment Collated Report (September 2021).

1.21. It is also unclear whether in their consideration of the options the Council have afforded any consideration to our representations whereby we set out the reasons why the site would not result in unrestricted sprawl of the large built-up area, would not cause the merger of neighbouring towns, would not create unacceptable encroachment into the countryside, would not impact on the special character of historic towns, and would not discourage urban regeneration; all relevant matters when considering the suitability of releasing the site from the Green Belt.

1.1. Conversely, the release of Green Belt land for housing at Fiddlers Ferry would reduce an essential gap between Widnes and Warrington. Green Belt is a critical consideration in the

³ **GB4**, page 199

context of Warrington given its location between Greater Manchester and the Liverpool City Region and the erosion of the essential gap between Warrington and these two larger conurbations will significantly undermine the role of the Green Belt in the North West.

Sustainability Appraisal: SA Report (August 2021)

- 1.2. The Site Profiles for Local Plan Omission Sites (June 2022) cross references the Sustainability Appraisal: SA Report (August 2021) (**SP3**) and suggests that it explains, on page 23, how an urban extension to the west of Warrington was ruled out at the Preferred Development Option stage as land in this location has the potential to have the greatest negative effects due to the loss of strongly performing Green Belt land. This is untrue.
- 1.3. The Sustainability Appraisal: SA Report (August 2021) does not, on page 23 or elsewhere, draw any conclusions an urban extension to the west of Warrington in the context of Green Belt performance. Irrespective, the Council clearly support a strategy whereby land is released from the Green Belt in the west of the Borough as evident in the proposed Green Belt release at Fiddlers Ferry which is found to make a moderate and strong contribution to the Green Belt⁴.
- 1.4. That said we take major issue with Fiddlers Ferry and do not consider it a sound allocation (see response to **Matter 6c: Main Development Area: Fiddlers Ferry**).

Site Proformas – West (July 2017)

- 1.5. The Site Profiles for Local Plan Omission Sites (June 2022) cross references the Site Proformas – West (July 2017), which identifies site constraints (flood zones, agricultural land classification etc).
- 1.6. These constraints have been fully taken on board as demonstrated in the representations and supporting Development Statement and there is nothing to lead the Council to a conclusion other than the site is suitable, available, and achievable for residential development.

Development Options and Site Assessment Technical Report (March 2019)

- 1.7. The Site Profiles for Local Plan Omission Sites (June 2022) cross references the Development Options and Site Assessment Technical Report (March 2019) (**O3**), which considers an option for a Garden Suburb of around 4,200 homes and an urban extension to the west of Warrington of around 1,600 homes.
- 1.8. At that time, the Council must have considered a number of sites to the west of Warrington rather than a single urban extension, since they came to the conclusion that sites to the west of the Borough did not perform as strongly (to the other options considered) due to concerns around the fragmented nature of available sites which may make infrastructure delivery more difficult, and that development is likely to impact on the strategic importance of the Green Belt between the main urban area of Warrington and Widnes⁵.

⁴ Green Belt Assessment – Fiddlers Ferry (April 2021) (**GB2**)

⁵ **O3**, para 3.16

- 1.9. There are four notable points that we make in response to the conclusions in that document:
- The site is not being put forward as an urban extension, rather a medium/large site that is demonstrably suitable, available and achievable
 - As demonstrated in the representations and supporting Development Statement, infrastructure delivery is not a constraint which would prevent this site coming forward
 - The release of Green Belt land at the site would not reduce the gap between the main urban area of Warrington and Widnes of effect Green Belt performance
 - The release of Green Belt land proposed at Fiddlers Ferry would reduce the essential gap between these two settlements as demonstrated in the Green Belt Assessment: Fiddlers Ferry (April 2021) (GB2)

Development Options and Site Assessment Technical Report (September 2021)

- 1.10. The Site Profiles for Local Plan Omission Sites (June 2022) cross references the Development Options and Site Assessment Technical Report (September 2021) (O1), which similarly suggests that the Council has previously assessed urban extensions to the north and west of Warrington and identifies issues around Green Belt performance and infrastructure delivery, and that the Council does not consider that these options perform well enough to merit inclusion in a further options assessment process⁶.
- 1.11. The points set out at para 1.9 above are equally relevant to consider.

Conclusions

- 1.12. The Council could have considered this site as a suitable option for Green Belt release and allocation for residential development in the WLP (SP1). On the basis that they did not and instead favour the Fiddlers Ferry allocation which we take major issue with (see response to **Matter 6c: Main Development Area: Fiddlers Ferry**) means that the Council have failed to provide sufficient justification to not include the site as an allocation in the WLP.

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

- 1.13. No comment.

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?

⁶ O1, para 4.19

1.14. No comment.

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?

1.15. No comment.

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?

1.16. No comment.

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?

1.17. No comment.

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

1.18. No comment.

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

1.19. No comment.

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

1.20. No comment.

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

1.21. No comment.

The Green Belt

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

1.22. No comment.

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?

1.23. No comment.

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

1.24. No comment.

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?

1.25. No comment.

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?

1.26. No comment.

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

1.27. No comment.

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?

1.28. No comment.

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

1.29. No comment.

Viability

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

1.30. No comment.

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?

1.31. No comment.

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?

1.32. No comment.



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?

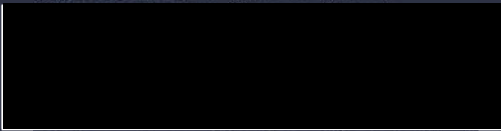
1.33. No comment.

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

1.34. No comment.

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