

Warrington Local Plan EiP
Matter 3: The Spatial Strategy

Hollins Strategic Land
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1 Introduction

- 1.1 This hearing statement is made by Hollins Strategic Land (HSL) to the Warrington Local Plan Examination in Public (EiP) and follows previous consultation representations to the local plan process which promoted the Warrington Garden Suburb - WGS). HSL is advocating the reinstatement of the WGS as an omission site along with other developers and landowners who previously formed part of the WGS landowner group (referred as Omission Site Profile: 24) and other landowners who have a vested interest in delivering the WGS.
- 1.2 In summary, HSL do not consider the Local Plan, as submitted, is legally compliant or sound.
- 1.3 HSL consider that the submitted Local Plan is unsound in a number of areas:
- i. The overall housing requirement of 14,688 dwellings over the plan period (2021 to 2038) is too low (816dpa). The circumstances in Warrington provide clear justification for a higher housing requirement than the standard method:
 - a. Most significantly, the housing requirement does not align with projected levels of economic growth.
 - b. The housing requirement should be increased to address affordable housing need.
 - ii. The housing requirement should not be phased to reduce delivery in the early years of the plan period. This would compound the supply of housing needs at a time when they should be met as urgently as possible. Instead of phasing the requirement, the correct approach is to boost supply in the early years of the plan, and this can be done through the reinstatement of the WGS.
 - iii. Insufficient housing land has been identified in the short term, and overall, to meet the identified requirement (let alone a higher figure). There is a significant overreliance on the existing main urban area, existing inset settlements and SHLAA sites, despite such sites failing to deliver and the Council's own evidence demonstrating that significant elements of the SHLAA supply are not viable.
 - iv. The plan proposes no robust flexibility to respond to change, for example non-delivery of allocations such as Fiddler's Ferry or SHLAA sites. In the absence of such flexibility, there is a real risk that housing need issues will be further exacerbated in Warrington.
 - v. The plan proposes too much emphasis on delivering high housing densities:

- a. At least 130 dwellings per hectare (dph) on sites that are within the defined town centre of Warrington.
- b. At least 50 dph on sites that are within the wider town centre masterplan area and those sites adjacent to a district centre or in other locations that are well served by frequent bus or train services.
- vi. This reliance on high density development conflicts with the borough wide housing target of 65% of market homes being 3-bed or larger as identified in the Local Housing Needs Assessment (LHNA 2021).
- vii. There is no conceivable way that the identified affordable housing need (433dpa) which equates to 52% of the overall requirement could be met in full, yet the Council has failed to consider whether it would be appropriate to increase the housing target to make further provision for social housing needs.
- viii. The plan fails to provide safeguarded land to meet longer term development needs and to provide permanence to the Green Belt.

1.4 The following key changes are therefore necessary to make the Local Plan sound:

- i. The plan period should be extended to cover at least a 20 year period 2021-2041 and ensure that longer term needs are properly considered over a 30-year period from adoption.
- ii. The housing requirement needs to be increased to at least 943dpa to properly align housing and economic growth and to meet the identified affordable need.
- iii. The supply of housing sites should be boosted significantly and diversified through the allocation of additional deliverable sites.
- iv. Additional Green Belt land release is required.
- v. Safeguarded land should be identified, to meet development needs post 2038.
- vi. Warrington Garden Suburb must be reinstated in full.

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

- 2.1 The core evidence documents support a higher housing need figure above 816dpa in order to balance growth in jobs and housing in addition to meeting needs. The evidence still leads to the need to plan for 945 homes per annum over at least a 20-year period. The attempt to back-peddle and downplay Warrington’s ability to deliver economic growth is somewhat presumptuous.
- 2.2 Overall, the spatial strategy without the Garden Suburb is not justified given it is not an appropriate strategy to meet housing needs after taking account of reasonable alternatives such as the Garden Suburb. The Local Plan as submitted is not effective and is not consistent with national policy.
- 2.3 HSL set out further comments in respect of the Inspectors’ questions which together with the submitted Reg 19 Representations will inform further participation at the hearing session.
- 2.4 *Overall Spatial Strategy for housing*

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

- 2.5 HSL supports a brownfield first approach. However, given the location of Warrington as a key economic hub sandwiched between the city region of Liverpool and Manchester as well as lying close to economic hubs of Cheshire together with its origins as a New Town mean that its forward planning strategy must ensure growth is planned for and the Development Plan must not stifle future opportunities to meet housing need. Regeneration of the town centre is supported and indeed there is much synergy between green field development on the edges of large towns and the ability to attract further inward investment into regen strategies.
- 2.6 However past performance in housing delivery highlights the restraints on supply from existing urban areas. Warrington’s land supply position has been consistently below 5 years from a number of years resulting in a failure of the Housing Delivery Test. In

Warrington, the supply of new homes has been severely restricted over the last 10 years.

- 2.7 We respectfully reserve the right to provide our thoughts and comments at the hearing session.

Q.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 maximized, for example in terms of specific identified sites, an allowance for smaller sites and optimising densities?

- 2.8 We think not. We refer to paras 6.17 to 6.26 of our Reg 19 representations. Capacity is somewhat lower than that of the Council's assessment. We assessed just 7 sites and concluded a discount of over 2000 homes. We respectfully reserve the right to provide our thoughts and comments at the hearing session.

Q.3 On a strategic, Borough wide level, does the scale of housing growth required, the capacity of the existing urban area and the ability of neighbouring authorities to accommodate any of Warrington's housing needs provide the exceptional circumstances to justify altering the Green Belt in principle?

- 2.9 Yes, the evidence is clear that exceptional circumstances exist to justify altering the Green Belt in principle. Although the scale of housing growth proposed in the submission version Local Plan is too low compared to relatively recent versions of the plan (notably the pre submission version 2019), exceptional circumstances continue to exist to justify altering the Green Belt to meet housing needs and deliver wider Local Plan objectives.

- 2.10 We refer to our Reg 19 representations and respectfully reserve the right to make further comment on this matter during the hearing session.

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

2.11 We advocate that a flexibility allowance is built into the housing requirement number to address housing need and to ensure sufficient homes are delivered in line with economic growth policies. Such an approach is justified in light of the evidence which confirms affordability issues, constrained supply from urban areas and an existing shortfall in housing land to meet wider housing needs of the borough.

2.12 We respectfully reserve the right to provide our thoughts and comments at the hearing session.

Q.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 homes in Table 1 of the Local Plan, particularly as 10% flexibility has already been factored in?

2.13 We respectfully reserve the right to make comment at the hearing session.

Q.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?

2.14 We advocate that a large-scale green belt release adjacent the south east urban area of Warrington is a sustainable option, as confirmed in the existing submitted evidence base. The Garden Suburb strategy is supported by the evidence base. The Garden Suburb is;

- a credible option to deliver homes in a sustainable location;
- of a scale that allows for the delivery of new infrastructure provision in accordance with LTP4 objectives; and
- would meet other wider social and green infrastructure objectives.

2.15 We respectfully reserve the right to make comment at the hearing session.

Q.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?

- 2.16 We advocate that the focus of growth and subsequent green belt release must be on land adjacent the main urban settlement of Warrington which is close to existing jobs and infrastructure and would be of a sufficient scale to deliver tangible community benefits, planned infrastructure and ensure new boundaries are permanent in the longer term so they can endure beyond the plan period. We therefore advocate that the Garden Suburb be reinstated in full. We respectfully reserve the right to comment at the hearing session on these matters.
- 2.17 We support a strategy to deliver homes to outlying settlements. However, the proposed distribution figure of 801 homes is not based on robust evidence of local need and capacity at such settlements has not been fully assessed as part of the evidence base.

Adjacent to the main urban area

Q .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?

SE Warrington UE

- 2.18 The SEWUE reflects a smaller part of the Garden Suburb proposal which would have been previously referred to as Village A (Garden Suburb Framework document 2019).
- 2.19 We respectfully reserve the right to make comment at the relevant hearing session.

Fiddlers Ferry Site

- 2.20 This is a coal fire power plant that became available after its closure in 2020. We understand the Council was informed of the decision in 2019. The site area comprises previously developed land and agricultural land in the Green Belt. The proposals incorporate employment on the previously development land parcel with residential on agricultural land with longer term potential for residential to the south. However, its location to the west of Warrington was previously dismissed as an option for growth in previous years. The SA raises concerns with distant from Warrington and services

together with issues of coalescence between Widnes and Warrington and narrowing the GB gap in this part.

2.21 We respectfully reserve the right to make comment at the relevant hearing session.

Thelwall Heys

2.22 Previous assessment options focused on delivering a large scale option that could create the critical mass required to deliver infrastructure benefits. Smaller dispersal sites such as Thelwall Heys were previously discounted as Green Belt release options on the grounds of providing no tangible infrastructure benefits of releasing land from the Green Belt, like that of Thelwall Heys.

2.23 We understand, the Council now identifies the Thelwall Heys site as an option for Green Belt release on the grounds that additional sites are now required in the early years of the plan period to offset the longer lead in times and potential risks associated with larger urban extensions such as, at the time, the Garden Suburb. As part of the core landowner group with interests in the Garden Suburb, at the time, HSL made clear submissions outlining a deliverable solution for the Garden Suburb and provided reassurances to the Council that the allocation could be delivered in a timely manner along with infrastructure requirements. Indeed, HSL advocated that increasing housebuilder outlets across the Garden Suburb would ensure early delivery of homes in accordance with the proposed housing trajectory. By way of example, HSL advocated that opening new access options from the A50 Knutsford Road and at Broad Lane would allow for early completions whilst delivering the core infrastructure required.

2.24 We respectfully reserve the right to make comment at the relevant hearing session.

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

2.25 We respectfully reserve the right to make comment at the relevant hearing session.

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

2.26 We support the role of the Sustainability Appraisal and its conclusions but raise concerns regarding the unsound approach in identifying the proposed allocations and

removal of the Garden Suburb. We reserve the right to make further comments at the hearing session.

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

2.27 We do not believe all suitable options were considered in the revised Local Plan which based itself on lower housing numbers and a reduced plan period. For example, the Garden Suburb was not assessed as a whole in delivering the 816dpa. Neither was the option to identify safeguarded land.

2.28 We reserve the right to make further comment at the hearing session.

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

2.29 We reserve the right to make further comment at the hearing session.

The Green Belt

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

2.30 Yes, we advocate that the Local Plan identifies safeguarded land in order to ensure longer term permanence of Green Boundaries last beyond the plan period.

2.31 Additionally, safeguarded land would deliver flexibility and provide contingency in the plan.

2.32 Whilst we support the full reinstatement of the Garden Suburb as was presented in the 2019 pre-submission version of the Local Plan, we fully support the option to safeguard the land area in this part of south east Warrington, which would be bound by the A50

Knutsford Road in the east and the M56 to the south and existing urban area of Warrington to the west and north.

Q.28 What is the basis for the inset settlements (excluded from the Green Belt) and Green Belt settlements (washed over)? Is the loss of settlements in each category justified in each case?

2.33 We reserve the right to make comment once we have sight of the Council's response.

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

2.34 As proposed, Policy GB1 is not justified, effective or consistent with national policy. It fails to define robust boundaries and fails to plan for the longer term.

The overall approach to Infrastructure

Q.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?

2.35 We believe the Local Plan fails to plan for the necessary infrastructure required to support its development proposals. For example, at Fiddlers Ferry – there is no assessment of highway impacts both within the borough boundary and outside of it at Widnes.

Q.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?

2.36 We respectfully reserve the right to comment at the hearing session.

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

2.37 We reserve the right to make comment at the hearing session.

Q.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?

2.38 We reserve the right to make comment at the hearing session.

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

2.39 The removal of the Warrington Garden Suburb results in reduced infrastructure provision. There will be no new east-west links between the A49 and A50 and public transport improvements that connect the new communities which formed part of the core proposal of the Garden Suburb.

2.40 The Local Plan as proposed without the Garden Suburb will fail to deliver objectives to deliver a Mass Transit Route at south east Warrington, as envisaged by the adopted Warrington Local Transport Plan Policy.

2.41 Without the Garden Suburb, there will be no new District / Neighbourhood Centre or Country Park around Grappenhall Heys.

2.42 We reserve the right to make comment at the hearing session.

Viability

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

2.43 We reserve the right to make further comment at the hearing session.

Q.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?

2.44 We reserve the right to make further comment at the hearing session.

Q.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?

2.45 We reserve the right to make further comment at the hearing session.

Q.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?

2.46 We reserve the right to make further comment at the hearing session.

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

2.47 We reserve the right to make further comment at the hearing session.

Paul O'Shea *BA(Hons) PGdip TP MRTPI*

Director