

Warrington Local Plan Examination

Matter 3 – The Spatial Strategy

ON BEHALF OF BELLWAY HOMES (2297)

July 2022

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1. Introduction

- 1.1 This Hearing Statement is submitted on behalf of the Manchester division of Bellway Homes Limited (“Bellway”) (Respondent ID: 2297) in relation to the Examination of the Warrington Local Plan (“the Plan”) [SP1].
- 1.2 It has been prepared by Nexus Planning in relation to Matter 3 (The Spatial Strategy), which explores whether the Spatial Strategy is justified, effective and consistent with national policy, including in terms of the distribution of development across the Borough, site selection, the overall approach to the Green Belt and the overall approaches to infrastructure provision and viability.
- 1.3 Bellway controls the land to the north of Winwick, which is proposed to be allocated by Policy OS6 for a minimum of 130 homes.
- 1.4 Within this context, we provide a response specifically in relation to:
 - Overall spatial strategy for housing – Questions 3, 5, 6 and 7;
 - Outlying settlements – Questions 8-9 and 11-13; and
 - The Green Belt – Question 28.
- 1.5 In summary, our responses to the Inspectors’ Matters, Issues and Questions (“MIQs”) conclude that:
 - Question 3 – exceptional circumstances have been demonstrated to justify altering the Green Belt;
 - Question 5 – the scale of land to be removed from the Green Belt for housing is supported;
 - Question 6 – the spatial strategy is an appropriate strategy;
 - Question 7 – the split between the urban area and the outlying settlements is appropriate;
 - Question 8 – the approach to the selection of site allocations in the outlying settlements is supported;
 - Question 9 – further evidence has been submitted by landowners, promoters and developers;
 - Question 11 – the site allocation of the land to the north of Winwick is supported;
 - Question 12 – the site selection methodology is supported;
 - Question 13 – the scale of housing growth in the outlying settlements is supported;
 - Question 28 – the identified of Winwick as an ‘inset settlement’ is supported.
- 1.6 To aid the Inspectors, we have cross-referenced our answers to the ‘tests of soundness’ in paragraph 35 of the National Planning Policy Framework, July 2021 (“NPPF”). Where necessary, we have suggested modifications to make the Plan ‘sound’.
- 1.7 We look forward to discussing our Statement and representations with the Inspectors at the hearing sessions on Tuesday 6 and Wednesday 7 September 2022.

2. Response to Questions

Overall Spatial Strategy for 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, in our view, exceptional circumstances have been demonstrated for altering Green Belt boundaries, and therefore the Plan is **positively prepared, justified** and **consistent with national policy** in this regard.
- 2.2 Paragraph 141 of the NPPF requires that, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, authorities should have examined fully all other reasonable options for meeting its identified need for development.
- 2.3 In this context, we support the explanation of how exceptional circumstances for Green Belt release are demonstrated in Warrington, as set out within section 3.4 of the Plan [SP1]. In summary, 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 Warrington’s housing development needs. The implications of not meeting Warrington’s full development needs are clearly set out.
- 2.4 In addition, paragraph 2.32 of the Development Options and Site Assessment Technical Report (September 2021) [OD1] states it is not possible for the Council to deliver the minimum number of homes expected to be planned for under the Government’s standard housing method without the release of Green Belt land. Furthermore, paragraph 2.33 asserts that the Council does not consider the two exceptions to meeting this need in paragraph 11 of the NPPF are relevant.
- 2.5 The only option remaining for Warrington therefore is to release land from the Green Belt to meet its housing needs, to ensure that issues of affordability are addressed and that sufficient homes are provided to support the planned level of economic growth. By way of context, Warrington’s neighbouring authorities (Cheshire East, Cheshire West, Halton and St Helens) have already concluded exceptional circumstances exist. In these terms, the provision of new housing constitutes exceptional circumstances.

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?

- 2.6 In our view, the scale of land proposed to be removed from the Green Belt (to accommodate at least 4,821 homes in the plan period) is based on proportionate evidence, and therefore the Plan in this regard is **justified**.
- 2.7 A higher quantum of homes to be allocated on land proposed to be removed from the Green Belt than are required will provide additional flexibility (over and above the 10% flexibility allowance), which will ensure the plan is deliverable over the plan period, and in these terms, the Plan is **effective**.

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?

- 2.8 We support the Plan's spatial strategy, including the dispersal of some incremental growth to sustainable outlying settlements, such as Winwick. In our view, this promotes a sustainable pattern of development that seeks to meet the development needs of the area, align growth and infrastructure, improve the environment and mitigate climate change and adapt to its effects, as required by paragraph 11 of the NPPF. It is a balanced approach which will allow Warrington's settlements to grow in an organic and sustainable way to meet needs without having a significant adverse impact on assets of particular importance.
- 2.9 We note the spatial strategy has been chosen in preference to two alternative high level spatial options which were considered and discounted in the Preferred Development Option version (July 2017) [PVL2]. Those being Green Belt release only in proximity to the main Warrington urban area (Option 1) and settlement extension in one or more settlements with remainder of growth adjacent to the main urban area (Option 3).
- 2.10 We also note that the preferred strategy is an evolution of the Proposed Submission Version's (March 2019) approach [PLVP1], which also dispersed some incremental growth to the outlying settlements.
- 2.11 We therefore support the articulation of how the Council has arrived at the preferred spatial strategy in paragraphs 3.3.7 to 3.3.18 of the Plan [SP1] and the Development Options and Site Assessment Technical Report (September 2021) [OD1].
- 2.12 In particular, paragraph 3.3.14 importantly recognises that incremental development within the settlements (such as Winwick) will provide housing choice and help support local services without playing unacceptable pressure on local infrastructure, and will ensure that the character of the respective settlement is maintained.
- 2.13 As such, we consider it to be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. In these terms, the Plan is **justified**.

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?

- 2.14 We support the proposed split of housing allocations and Green Belt release between land adjacent to the main urban area and outlying settlements (including Winwick) as this accords with the Plan's spatial strategy.
- 2.15 We note that paragraph 2.22 of the Development Options and Site Assessment Technical Report (September 2021) [OD1] explains there is 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 settlement.
- 2.16 We understand from 2.24 of OD1 that it may have been possible to disperse a much higher level of development to the outlying settlements, but the conclusions were that the environmental impacts would be more significant than other options and could be difficult to mitigate. Furthermore, such an option would not accord with the Plan's objectives and could undermine the regeneration of the main Warrington urban area.

2.17 Notwithstanding, we note that proportion to be dispersed to the outlying settlements equates to just:

- 5% of the overall housing requirement (801 ÷ 14,688);
- 18% of the homes required on land to be removed from the Green Belt (801 ÷ 4,821);
- 16% of the homes that can be accommodated on land to be removed from the Green Belt (801 ÷ 4,821).

2.18 As such, the split dispersed to the outlying settlements only represents a small proportion of Warrington’s growth. However, to direct any less housing development to the outlying settlements would not be appropriate as it would undermine the Plan’s strategy and would place increased pressure on the main urban area.

2.19 In addition, as recognised at paragraph 2.30 of OD1, a smaller proportion would also not contribute to the long term vitality of outlying settlements. This is particularly important with relevance to paragraph 79 of the NPPF which encourages housing to be located where it will enhance or maintain the vitality of rural communities, and that policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

2.20 We therefore find the Plan to be **justified** in this regard.

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?

2.21 We support the approach to the selection of site allocations in the outlying settlements (including Winwick), as described in Section 3 of the Development Options and Site Assessment Technical Report (September 2021) [OD1].

2.22 More specifically, we support the explanation as to how the land to the north of Winwick was selected as an allocation (Policy OS6), as summarised in the Site Profiles for Local Plan Site Allocations (June 2022) [CD02], which we consider is a robust and evidenced approach.

2.23 In particular, we understand the site was originally considered as part of a much wider parcel of land (ref. WI7) in the Green Belt Assessment Final Report (October 2016) [GB5], which was concluded to make a ‘moderate’ contribution to the Green Belt.

2.24 The site itself was then submitted as part of the original ‘Call for Sites’ exercise undertaken between October to December 2016 (ref. R18/040), and accordingly it was assessed in detail in Site Assessment Proformas (2019) [SAP2], which concluded it should be a selected site. In addition, the Sustainability Appraisal (March 2019) [SA1]. This underpinned the proposed allocation of the site (ref. Policy OS9) in the Proposed Submission Version’s (March 2019) [PLVP1].

2.25 Subsequently, the site was reconsidered by the Green Belt Site Selection Implications of Green Belt Release Report (August 2021) [GB3], which concluded:

“The site currently makes a moderate contribution to Green Belt purposes. Whilst development of the site would entail a small incursion into undeveloped countryside, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Winwick. A new recognisable and permanent Green Belt boundary would be created by strengthening existing boundaries.”

2.26 This is also reflected by the Green Belt Site Assessment Collated Report (September 2021) [GB4]. The site also performed well in the updated Sustainability Appraisal (August 2021) [SP3]. As such, the site was carried forward into Policy OS6 of the Plan [SP1].

2.27 The above was also supplemented by evidence submitted through Bellway's previous representations, including a Delivery Statement (June 2019) (Appendix 1 to our Regulation 19 representations, dated 15 November 2021).

2.28 We therefore find the Plan to be **justified** and **effective** in this regard.

Question 9

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

2.29 Again, Section 3 of the Development Options and Site Assessment Technical Report (September 2021) [OD1] sets out the evidence in support of the selection of site allocations.

2.30 In addition, we understand the gathering of evidence by the Council has also been supplemented by evidence submitted by landowners, promoters and developers in relation to sites. This is acknowledged by paragraph 10.11.9 of the Plan [SP1].

2.31 For example, in relation to the land to the north of Winwick (Policy OS6), Bellway has submitted evidence to the Council both formally through representations and informally through background discussions. Further details are contained within our Matter 7(e) Statement.

2.32 As such, we find the Plan to be **justified** in this regard.

Question 11

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

2.33 We cannot comment on the discounting of competing alternative options submitted by others, but clearly we support the Plan's allocation for the land to the north of Winwick (Policy OS6) [SP1], which has been proposed as a site allocation since the Proposed Submission Version (March 2019) [PVL1].

2.34 We note that paragraph 10.11.4 of the Plan [SP1] explains the site performed well in terms of the assessment against the objectives of the Local Plan, the requirements of the NPPF and the Sustainability Appraisal. It was concluded that the site only makes a moderate contribution to the objectives of the Green Belt.

2.35 Furthermore, paragraph 10.11.5 states its location will ensure good access to services in Winwick local centre, Warrington Town Centre, and major existing and proposed employment areas at Winwick Quay, Omega and Gemini.

2.36 In addition, paragraph 10.11.6 clarifies the allocation policy will allow the site to be delivered quickly and ensure that development comes forward in a comprehensive manner that preserves and enhances the built and natural environment. Contributions towards infrastructure provision will be secured to ensure Winwick's infrastructure can support the increased population generated by the site's development.

2.37 This is reflected by various evidence base documents, as set out beneath paragraph 10.11.9 of the Plan.

2.38 Further details as regards site-specific matters are contained within our Matter 7(e) Statement.

2.39 Therefore, we consider the allocation to be **positively prepared, justified, effective** and **consistent with national policy**.

Question 12

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

- 2.40 Yes, in our view, we are supportive of the site selection methodology, as detailed in our response to Question 8.
- 2.41 In summary, we believe the site selection process as described in Section 3 of the Development Options and Site Assessment Technical Report (September 2021) [OD1] has been founded on solid planning principles, having regard to the achievement of sustainable development.
- 2.42 This has included site specific assessments, for example, Green Belt Assessments [GB3, GB4, GB5], Site Assessment Proformas [SAP2], Sustainability Appraisal [SA1, SP3]. Site Profiles [CD02] and Heritage Impact Assessment [HIA7].
- 2.43 Furthermore, there has been a range of technical assessments undertaken, including flood risk [E1, E2, E3], air quality [E5], Habitats Regulation Assessment [E4], transport modelling [T1, T2, T4, T5, T6], infrastructure [IN1, IN2], open space and recreation [IN3, IN4, IN5, IN6].
- 2.44 In addition, the above was also supplemented by evidence submitted through Bellway's previous representations, including a Delivery Statement (June 2019) (Appendix 1 to our Regulation 19 representations, dated 15 November 2021).
- 2.45 As such, the conclusions of this process have resulted in a positive suite of deliverable and developable allocations in sustainable locations, including in the outlying settlements, such as the land to the north of Winwick (Policy OS6).
- 2.46 We therefore find the Plan to be **justified** in this regard.

Question 13

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

- 2.47 Yes, in our view, the scale of housing growth in each of the outlying settlements (including Winwick) is **justified**.
- 2.48 Overall, the scale of housing development dispersed by the Plan [SP1] to the outlying settlements to total 801 homes, albeit this has reduced from 1,085 homes in the Proposed Submission Version (March 2019) [PVL1].
- 2.49 Paragraph 2.22 of the Development Options and Site Assessment Technical Report (September 2021) [OD1] explains there is 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 settlement.
- 2.50 We understand this spatial strategy derives from Option 2 of the Preferred Development Option Regulation 18 Consultation (July 2017) [PVL2], which proposed the majority of Green Belt release adjacent to the main urban area with incremental growth in outlying settlements. For example, Table 7 of PVL2 explained that incremental growth in the outlying settlements could contribute to longer term sustainability of local services and businesses, promote housing choice and deliver a number of smaller sites in the early part of the plan period.

- 2.51 Paragraph 1.10 of the Area Profiles and Options Assessment Technical Note (July 2017) [O4] explains ‘incremental growth’ means based on a level of development that could be accommodated by existing infrastructure, subject to minor expansion of that infrastructure, up to 10% of settlement size.
- 2.52 Furthermore, the Settlement Profiles - Outlying Settlements report (July 2017) [O6] identifies incremental growth would see Winwick increase in size by approximately 10%. There are a number of development opportunities which would not impact on the character of the settlement or the surrounding landscape.
- 2.53 In addition, Bellway’s Delivery Statement (June 2019) (Appendix 1 to our Regulation 19 representations, dated 15 November 2021) contains an audit of the local context, which demonstrates that Winwick is a sustainable outlying settlement.
- 2.54 In these terms, we consider the Plan’s [SP1] proposed scale of growth in Winwick, through the allocation of at least 130 homes at the land to the north of Winwick (Policy OS6), to be entirely **justified**.

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?

- 2.55 Paragraph 5.1.20 of the Plan [SP1] sets out the rationale for the settlements in the Borough. It is explained that the larger settlements and those which provide a greater number of services are ‘inset’ (i.e. excluded) from the Green Belt, recognising the potential for their sustainable growth.
- 2.56 Acknowledging the assessment within the Settlement Profiles - Outlying Settlements report (July 2017) [O6], as well as Bellway’s Delivery Statement (June 2019) (Appendix 1 to our Regulation 19 representations, dated 15 November 2021), we therefore find the identification of Winwick as an inset settlement to be **justified**.

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