



Warrington Borough Council Local Plan Examination

Matter 3 – The Spatial Strategy

Hearing Statement

July 2022



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MATTER 3 – THE SPATIAL STRATEGY

Issue - Whether the Spatial Strategy is justified, 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

Overall Spatial Strategy for Housing

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

- 2.1.1 Yes, in principle Gladman believe that the proposed strategy of seeking to maximise the development potential of the Borough's existing urban areas is appropriate and justified as a component of the Council's overall spatial strategy. Alongside the proposed release of land from the Green Belt, it is logical to examine the development capacity of the existing urban area and the potential supply of housing that could be derived from previously developed land and other opportunities within the authority's existing urban boundaries.
- 2.1.2 However, it is also important to ensure that any assumptions that have been made over the capacity of the urban area and the contribution that it could make to Warrington's housing needs are based on robust and accurate information in respect of site delivery and availability. This includes the intentions of individual landowners, site lead-in times and supporting infrastructure requirements, the use of accurate delivery rates and site capacity expectations. It is important that this element of the Council's strategy is realistically capable of providing the 11,785 dwellings that are expected to arise from this source over the Local Plan period.

Question 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 maximised, for example in terms of specific identified sites, an allowance for smaller sites and optimising densities?

- 2.1.3 This is primarily a question for the Council. However, as explained within the Council's Development Options and Site Assessment Technical Report (OS1) and Section 3.4 of the Updated Proposed Submission Version Local Plan (SP1), it is Gladman's understanding that the urban capacity figure has been derived from a comprehensive review of the Council's Strategic Housing Land Availability Assessment (SHLAA) and Brownfield Register, the town centre masterplanning work being undertaken by the inward investment and regeneration agency, Warrington & Co, the availability of brownfield sites within the

Outlying Settlements, and a small number of brownfield sites within the Green Belt where the principle of development has been accepted.

- 2.1.4 Whilst Gladman has not scrutinised these sources of supply in detail or their ability to justify the urban capacity figure of 11,785 dwellings, we reiterate our earlier comments in response to Question 1 and need the need to ensure that any assumptions over the capacity of the urban area are based on realistic and accurate information. In the event that the quoted urban capacity figure is found to be lower than 11,785 dwellings, we submit that this could be interpreted as a requirement to release further land from the Green Belt.

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?

- 2.1.5 Yes. Gladman believe that exceptional circumstances have been demonstrated for removing land from the Green Belt in principle, with reference to paragraph 141 of the National Planning Policy Framework (the Framework). This describes how local authorities should be able to demonstrate that they have fully-examined all other reasonable options for meeting their development needs before concluding that exceptional circumstances for Green Belt release exist. This includes making as much possible use of suitable brownfield sites and underutilised land, optimising densities, and discussing the feasibility of meeting a proportion of the identified housing need in neighbouring authority areas.
- 2.1.6 As described above, the Council has clearly explained how it has sought to maximise the development potential of the existing urban area as part of its Local Plan strategy, including the scope for re-using previously developed land, with this leading to the identification of an urban capacity figure of 11,785 dwellings that is insufficient to meet its proposed housing target of 14,688 dwellings in full. It has described how it has purposefully sought to review and optimise site densities to minimise the amount of Green Belt release required, whilst also confirming that none of its neighbouring authorities are in a position to meet any of the Borough's housing needs.
- 2.1.7 The Warrington Green Belt has remained largely unchanged since it was first designated in 1971 and is tightly drawn around the main Warrington urban area and the outlying villages, with very limited scope for any development outside its boundaries. In order to meet Warrington's proposed housing requirement and development needs in full, it is now inevitable that some land must be released from the Green Belt to achieve this objective.

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

- 2.1.8 Gladman believe that it is appropriate and justified to factor a flexibility allowance into the Council's Local Plan supply calculations, to account for potential situations in which sites come forward at a slower rate than originally envisaged or for potential non-implementation.
- 2.1.9 The Local Plan's proposed flexibility allowance is set at 10%, equating 1,469 dwellings on the basis of the Council's proposed minimum housing requirement of 14,688 dwellings. However, as set out in our Updated Submission Version Local Plan consultation submissions and building on our responses to Questions 1 and 2 above, Gladman are mindful that the Council's development strategy is in part reliant on the delivery on a number of large-scale strategic sites to meet the Borough's housing needs. This includes Warrington Waterfront (1,070 dwellings), the South East Warrington Urban Extension (2,400 dwellings) and Land at Fiddlers Ferry (1,760 dwellings).
- 2.1.10 Whilst having no objection to the allocation of these schemes in principle, large sites of this nature are often associated with significant supporting infrastructure requirements, and the need to complete significant upfront technical and masterplanning work before new homes can be delivered. As a result, they are often slow to come forward, or can have a tendency to provide homes at a lower rate than originally envisaged when first allocated.
- 2.1.11 Taking account of these factors, Gladman believe that there may be justification for increasing the suggested flexibility allowance of 10% to 15% or 20%. To compensate for the potential lead-in times for these large scale schemes, Gladman submit that it could be justified to direct additional development to a further range of small to medium sized sites in the Borough's Outlying Settlements, over and above those that have already been proposed for allocation, that could come forward quickly and help to boost housing delivery in the short-term.

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?

- 2.1.12 This is a matter of clarification for the Council to address. However, on the basis of our responses to Questions 1, 2 and 4 above, Gladman submit there may be a need to release further land from the Green Belt, in addition to the two figures identified above.

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?

- 2.1.13 This is primarily a question for the Council to address, however, Gladman are supportive of the decision to release from the Green Belt at the Borough's Outlying Settlements, in addition to the focus of the main Warrington urban area, and believe this strategy is justified and appropriate.
- 2.1.14 Outside of the main Warrington urban area, the Borough's six Outlying Settlements (Croft, Culcheth, Glazebury, Hollins Green, Lymm and Winwick) are the largest villages and service centres within the Warrington Borough area. Adopting a spatial strategy that allows for incremental growth in these settlements, facilitated by release of land from the Warrington Green Belt in these locations, will help to sustain their on-going vitality and vibrancy and ensure their housing needs are met over the Local Plan period. It is vital that these villages and communities are allowed to grow alongside development within the main town area.
- 2.1.15 Gladman are particularly supportive of the decision to release land from the Green Belt in Lymm. As the largest of the six Outlying Settlements, Lymm, benefits from a good range of services and amenities that would be available to support further housing growth, including frequent public transport connections to Warrington town centre, a supermarket, education establishments and medical facilities, and a selection of other shops and facilities that can meet the day-to-day needs of existing and future residents. Any new development coming forward within the settlement would also ensure that these amenities are enhanced by way of proportionate developer contributions, in accordance with the requirements of the Council's site allocation policies.
- 2.1.16 Alongside Lymm, Gladman are also supportive of the decision to direct further development towards Croft. As another of the six Outlying Settlements, we submit that Croft is well positioned to accommodate further development that would meet the Borough's housing needs and support the settlement's ongoing vitality and vibrancy.

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?

- 2.1.17 This is primarily a question for the Council, however Gladman support the decision to direct at least 801 dwellings to the Outlying Settlements under Policy DEV1. We submit that this should be considered the minimum number of dwellings that should be directed to the Outlying Settlements as a part of the Council's spatial strategy, taking account of the need to deliver growth in these villages alongside development within the main urban area.

2.1.18 As described above, taking account of the potential delivery timescales for the Council's large scale strategic allocations and the difficulties that can often be accounted when bringing complicated schemes of this nature forward, Gladman believe that it would be justified to increase the level of housing directed to the Outlying Settlements to ensure a continuous supply of housing and provide greater flexibility in the Council's land supply position. This could be achieved by allocating additional sites in sustainable settlements such as Lymm and Croft, in addition to those already proposed for development.

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?

2.1.19 This is a primarily a question for the Council to address, taking account of the assessments it has undertaken and the methodology that it has followed. However, Gladman wish to reserve the right to comment on this question further at the Matter 3 hearing session, in respect of our site interests at Land off Pool Lane and Warrington Road, Lymm, as proposed to be allocated under Local Plan Policy OS4.

Question 9. What evidence fed into this process e.g. Green Belt Assessment, flood risk data etc?

2.1.20 This is another question for the Council to address. However, again, Gladman wish to reserve the right to comment on this question further at the Matter 3 hearing session, in the context of our site interests at Land off Pool Lane and Warrington Road, Lymm, as proposed to be allocated under Local Plan Policy OS4.

2.1.21 In this context, Gladman are supportive of the decision to identify Land off Pool Lane and Warrington Road, Lymm for removal from the Warrington Green Belt to meeting the Borough's housing needs. As described in our Updated Submission Version Local Plan representations, both sites are ideally positioned to accommodate further residential development, situated immediately adjacent to existing built up area of the settlement and within walking and cycling distance of its range of amenities and facilities. There are no technical or infrastructure constraints that would preclude the sites' ability to come forward in the short-term to make a welcome and important contribution to the supply of housing in early part of the Local Plan period.

2.1.22 Significantly, the Pool Lane and Warrington Road sites are both demonstrably capable of being released from the Warrington Green Belt without affecting the Green Belt's on-going function and openness and safeguarding the countryside from further encroachment in this location. Both sites are enclosed by a mixture of existing built development, dense tree

planting and vegetation planting, the route of Warrington Road and the Transpennine Trail. These durable boundaries would ensure that any development is well contained and will create a strong delineation between new built development and the retained Green Belt beyond. We strongly believe that exceptional circumstances have been demonstrated to justify the release of Green Belt in these location.

Question 10. How has the process been recorded and documented? What role did the SA have?

2.1.23 This is primarily a question for the Council to address. However, again, Gladman wish to reserve the right to comment on this question further at the Matter 3 hearing session, in the context of our site interests at Land off Pool Lane and Warrington Road, Lymm, as proposed to be allocated under Local Plan Policy OS4.

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

2.1.24 Again, this is primarily a question for the Council, although we must reserve the right to comment on this issue further at the Matter 3 hearing session. In the context of this question, Gladman again wish to reiterate our support for the decision to identify Land off Pool Lane and Warrington Road as allocations under Local Plan Policy OS4.

2.1.25 As detailed through our Updated Submission Version Local Plan representation, alongside the sites that form the focus of Policy OS4, Gladman are also promoting additional land at Camsley Lane, Lymm and Abbey Close, Croft, for residential development. Should it be determined that there is a requirement to identify further residential allocations to address the Borough's housing needs, we submit that both of these development opportunities would be well positioned to meet this requirement.

2.1.26 Land at Abbey Close, Croft, lies adjacent to the southern boundary of the proposed Local Plan allocation situated to the east of Deacons Close (Local Plan Policy OS1). The site currently occupies an area of Green Belt that is enclosed on three sides by existing built form and area of established woodland planting (Croft Grasslands Local Wildlife Site), whilst any new development would also be accompanied by the creation of a robust and defensible edge of enhanced planting along the site's eastern boundary.

2.1.27 In the context of the proposed allocation of Heathcote Stud (Policy OS1), it is questionable what on-going Green Belt function Land at Abbey Close would serve, with this parcel effectively becoming an in-fill site. In this respect, we submit that the site could clearly be developed without affecting the wider, on-going function of the Warrington Green Belt in this location and would be performing a weak Green Belt function overall. A location plan

for Land at Abbey Close, Croft was provided at Figure 2 of our Updated Submission Version Local Plan representations.

- 2.1.28 Land at Camsley Lane, Lymm is also well situated to accommodate further housing growth and could be released from the Green Belt without affecting its wider, on-going function. The site is contained by durable boundaries which would prevent further encroachment beyond the parcel if it were developed, including Camsley Lane, the route of the Bridgewater Canal and the M6 motorway corridor. We again submit that this would be logical location for further development should additional land be required to meet the borough's housing needs. A location plan for Land at Camsley Lane, Lymm was provided at Figure 3 of our Updated Submission Version Local Plan representations.

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

- 2.1.29 This is primarily a question for the Council to address and we reserve the right to comment on this issue further at the Matter 3 hearing session. However, as detailed in response to Question 11 above, Gladman are supportive of the decision to identify Land off Pool Lane and Warrington Road as allocations under Local Plan Policy OS4, and believe this proposal is justified and sound.

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

- 2.1.30 Gladman believe that it is justified to direct the majority of development allocated to the Outlying Settlements towards Lymm. After the main Warrington urban area, Lymm is the largest settlement within the Warrington Borough area and as stated above, is well served by amenities and facilities to support further growth within this location. We are also supportive of the decision to direct a proportionate level of growth towards Croft.
- 2.1.31 As described above, should it be necessary to identify further housing sites to meet the Borough's housing needs, in addition to currently allocated sites, we submit that it would be appropriate to meet this requirement in the Outlying Settlements through small to medium opportunities that can come forward in the short term, and proportionately increase the scale of development directed to these villages. We believe that Lymm and Croft would both be suitable locations in which to fulfil this need.

The Green Belt

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

- 2.1.32 As outlined in our Updated Proposed Submission Local Plan consultation comments, Gladman believe it that it may be necessary to give consideration to the identification of safeguarded land, in addition to the proposed Green Belt releases that are required to meet the Borough's present needs, to ensure the Borough's Green Belt boundaries endure well beyond the current Local Plan period.
- 2.1.33 Although we acknowledge that some proposed Local Plan allocations have the potential to deliver housing beyond the current Local Plan period, we submit that there is a distinction between flexibility that can be provided by longer term delivery on these site and potential windfall opportunities, and identifying safeguarded land that is intended to ensure the permanence of the Green Belt's boundaries.
- 2.1.34 It is clear that there is already limited capacity to meet the Borough's housing and development needs within the confines of the existing urban area, and this situation is only likely to be exacerbated in the future. There will also be limited opportunities to deliver development in alternative locations in the current Local Plan period, should the Council's large-scale allocations fail to deliver housing at the rate that is envisaged. On this basis, we therefore believe that there is a case for identifying safeguarded land through the current Local Plan process, to avoid the need to revisit the extent of the Green Belt through a future Local Plan review.