



MATTER 3 STATEMENT - METACRE

The Spatial Strategy

Statement on behalf of Metacre / Northern Trust – Respondent 2347

JULY 2022

DOCUMENT REFERENCE: 2347/03



1 INTRODUCTION

- 1.1 The responses to questions supplement the representations already made. We do not seek to repeat matters but to draw through our position to the questions posed.
- 1.2 It is the objective of Metacre to see the adoption of a sound development plan for Warrington and it is our firm opinion that to do so the Council must reinstate the deleted housing allocation, formerly OS1 Phipps Lane, Burtonwood, which Metacre is landowner and promoter.
- 1.3 Separate responses on behalf of Metacre are submitted to Matters 2 Duty to Cooperate, 4 Housing Need and Housing Requirement and 8 Housing Land Supply. These are supplemented by response made by the Consortium of developers, including Metacre, made by Lichfields and Roger Hannah on its behalf.

2 RESPONSE TO THE INSPECTORS' 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?

- 2.1 No.
- 2.2 We rely upon the response of the Consortium and iterate simply we agree that there is an over emphasis on the capacity for the urban area to accommodate housing needs that is not robust or justified. This leads to incorrect calculation of the amount of greenfield / Green Belt housing land to release outside the existing urban area.

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?

- 2.3 No.



2.4 Per Consortium evidence we consider that the urban capacity sites in a range between 9,074 and 10,175 dwellings.

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?

2.5 Yes.

2.6 This point has been clear in evidence since Preferred Development Options stage and consistent with neighbour authority approach to plan-making.

2.7 This same reason also justifies the identification of Safeguarded Lane beyond the plan period as it is inconceivable that post-plan period any future housing need will then be fully accommodated within the revised urban boundaries set in the UPSVLP.

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?

2.8 The Consortium's response sets out the basis for the calculation referred to in the question.

2.9 The figure of at least 4,821 includes 801 dwellings in outlying settlements comprises sites that excludes any allocation to Burtonwood following deletion of OS1 Phipps Lane. This site has potential capacity for at least 160 dwellings.

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?

2.10 The Council's approach (Option 2) is selected as it performs best against the UPSVLP objectives and to enable sustainable, incremental growth at outlying settlements. Metacre continues to support this option.

2.11 However, that approach is undermined in the detail of the UPSVLP in the removal of any allocation to one of the three largest outlying settlements, Burtonwood. Our response to the Council's justification (or lack thereof) for the action is covered in Matter 2 Duty to



Cooperate. For Option 2 Spatial Strategy to be delivered and supported in evidence there must be a considered and consistent approach to the outlying settlements, including allocation of housing to Burtonwood.

- 2.12 We therefore find ourselves in a position to support the Spatial Strategy (Option 2) in principle and the evidence base formed but object to the manner in which the latest UPSVLP iteration applies that strategy and evidence with reference to Burtonwood. The treatment leads to an unjustified approach which can, and we say should, be rectified by reinstatement of the allocation OS1 Phipps Lane.
- 2.13 We set out this case fully in our Statement UPSVLP 2347, Section 5, Allocation OS1 Phipps Lane.
- 2.14 To remove any uncertainty it is not Metacre's case that any other green belt release proposed in the UPVSLP cannot come forward alongside reinstatement of allocation OS1 Phipps Lane. This allocation is required to rectify a deficiency in the plan that exists irrespective of other site specific issues.
- 2.15 However, it is our submission (Statement UPSLVP 2347, Section 4) that the proposed allocation to Fiddler's Ferry is unsound and that the forecast housing delivery will fall short of the assumed levels. This connects also to housing trajectory to be considered under Matter 8 and the stepped housing requirement under Matter 4.
- 2.16 Housing trajectory and forecast delivery from selected sites does have a material impact on spatial strategy decisions including green belt release. Put simply to ensure delivery of housing in the first five years of the plan period to meet housing requirement will need allocation of deliverable sites that are available now. Former allocation OS1 Phipps Lane is one such site. A matter accepted in the supporting evidence base to the plan.
- 2.17 Therefore, even in the unlikely event (in our view) that allocation OS1 Phipps Lane is not reinstated as a matter of principle to ensure the spatial strategy is met in distributing homes to outlying settlements, it will naturally become a first consideration of an additional allocation to meet shortfall in the plan period from the over estimate of delivery from Fiddler's Ferry and/or under delivery to meet needs from allocations in Years 1-5 of the plan period.



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?

2.18 No.

2.19 The basis for the 801 is not clear. We know that the figure is lower than the 1,085 units in the 2019 PSVLP, which included site OS1 Phipps Lane capacity for at least 160 units. The 284 unit difference is not clearly explained and suggests a weakening of the implementation of the spatial strategy to sustainable growth at outlying settlements; completely in Burtonwood's case.

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?

2.20 As regards to the factors assessed Metacre supports the approach summarised in CD3 Site Profiles for Local Plan Omission Sites, with specific reference to the Green Belt Assessment, Sustainability Appraisal and Site Assessment Proforma. This is unsurprising as the combined evidence supports allocation of site OS1 Phipps Lane, Burtonwood from the conclusions and was the finding in the 2019 PSVLP.

2.21 Metacre objects to the evidence document and approach in the Council's O1 Development Options and Site Assessment Technical Report, September 2021 which at para.3.12 unceremoniously proposed deletion of allocation OS1 Phipps Lane on a transport reason that was not supported in evidence, or a matter even referenced in the supporting evidence.

2.22 To the contrary the evidence base, which Metacre supports, had consider transport issues in factors of site selection and did not find against the proposal leading to an unresolved contradiction in the evidence base. On the one hand the combined documents assessed and support the allocation, and on the other hand a single unsupported statement is made which is given substantial weight to negate all else. We set out this matter in detail in Statement UPSVLP 2347 and response to Matter 2 Duty to Cooperate.

2.23 To conclude on Q8 Metacre is forced into a position to find the factors unsound because of the late action of the Council in taking unevidenced action to reverse the findings of its own evidence base to support allocation OS1 Phipps Lane.



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

And

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

- 2.24 Partly addressed in answer to Q8 the issue for Metacre is not the evidence presented, but the lack of evidence specific to the removal of allocation OS1 Phipps Lane. At no stage following issue of PSVLP 2019 has the Council provided any written evidence to substantiate its highway ground to remove the allocation.
- 2.25 Moreover, through the Transport Technical Note, prepared by Curtins, (Statement UPSVLP 2347, Appendix 1), we have demonstrated that there was available evidence to the Council from its plan and that of St Helens to review and find the answer to the question it posed. Curtins' Note shows that there was at the time extensive highway evidence to analyse available to the Council for it to formulate a considered view on the potential highway impacts arising from new housing at Burtonwood and Bold Green Suburb allocation. That analysis would have shown its' concerns unfounded and would not have led to the misguided decision to remove the allocation OS1 Phipps Lane.
- 2.26 As to the role of the SA we merely record that before the decision to delete the allocation the SA aligned with the evidence base. Subsequently the evidence base was altered, though not completely or consistently (see Statement UPSVLP 2347, para.5.20 forward and relevant appendices). We provide this evidence to ensure that a clear record is available to the Examination of the previous positive support to allocation OS1 Phipps Lane in evidence and SA.

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

- 2.27 Former allocation OS1 Phipps Lane was correctly identified in the PVSLP 2019 as an available, deliverable, suitable and viable development site. It is supported in evidence by the Settlement Site Assessment Proformas (2018), Green Belt Assessment (2016 and updates), SA Report (2019), WBC Transport Model, Heritage Impact Assessment (2019), Habitat Regulatory Assessment (2019) and Infrastructure Delivery Plan (2019).
- 2.28 It seems an overstatement, but specific to this question, there is no evidential basis presented by the Council for the removal of allocation OS1 Phipps Lane. It therefore is



unclear why the option was discounted and the Council has chosen not to provide any evidence since its actions at some point after September 2019, nearly 3 years ago, to be examined.

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

2.29 No.

2.30 The methodology was sound, but the conclusions are not justified in relation to Burtonwood as an outlying settlement. The late and unevidenced reason to remove allocation OS1 Phipps Lane remains unjustified. There is no transparent process or evidence available to examine the conclusion and outcome.

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

2.31 No.

2.32 Burtonwood must be allocated housing growth. It has seen next to no development in a decade and the lack of allocation will commit the settlement to next to no growth for 15-20 years more. This is contrary to the Council's own Spatial Strategy (Option 2) and the evidence base it has prepared up to and including the 2019 PSVLP which allocated 160 homes at Burtonwood.

The Green Belt

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

2.33 Yes.

2.34 It is clear from the evidence presented by the Consortium that there will be a need to allocation Green Belt land to meet housing needs beyond the plan period. Potentially employment land too.

2.35 Setting aside disagreement on numbers, it is the Council's position at least 4,372 homes need to be allocated within this plan period from Green Belt land release. It does so on the basis of maximising delivery from within the urban area. It is inconceivable that in the context of an ongoing housing crisis of supply and affordability nationally and locally, that a future housing requirement / plan period will be so low level that it could be accommodated in whatever residual urban sites remain.



2.36 For this reason alone the Council should be planning for Safeguarded Land to give certainty, direction and clarity to residents and businesses of the longer-term spatial development of the borough. As safeguarded land is unavailable in this plan period it does not follow it must be allocated in the next, but it provides a starting point and supports the clear, long-standing national green belt policy approach to plan-making.

2.37 In earlier representations to Preferred Options, Metacre identified other land in its control at Burtonwood that could be allocated as safeguarded land. If it is directed that modifications are made to the plan to provide safeguarded land Metacre reserves it right to make further, detailed representation.

Q29. 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 Metacre seeks a main modification to reinstate allocation OS1 Phipps Lane, Burtonwood.

2.39 The plan is unsound without the modification for reasons set out above, in other matters and previous submission.

2.40 Statement UPSVLP 2347 and representations provide our approach and detail for policy wording, plans and associated revision to the Plan to accommodate the modification.

The overall approach to infrastructure

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?

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

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?

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

2.41 Combining the four questions above, Metacre notes the representations made by others of concern on the delivery of the Western Link Relief Road, and infrastructure related to



regeneration of Fiddler's Ferry. We share those concerns but leave others to submit and discuss the detail at the Examination.

- 2.42 What is relevant to all parties, including Metacre's interests at Burtonwood, is the outcome of these questions. If the Inspectors consider that there is too great an uncertainty on the delivery or timing of delivery of key infrastructure that housing delivery is dependent upon, then this goes to the heart of the issue of whether the spatial strategy (Option 2) is deliverable. It may mean, and this brings into focus Q38 & Q39 too, a greater emphasis in this plan period must be made on other housing land release to make-up shortfall in trajectory, i.e. to consider available, deliverable and suitable sites at outlying settlements. Metacre's interest of course lies with Burtonwood and OS1 Phipps Lane.
- 2.43 There are a number of reasons why OS1 Phipps Lane should be reinstated on the evidence (or lack of) alone as set out in representations and in questions above and to other papers. This is a further reason, if needed, for its reinstatement to absorb the prospect of under delivery at key allocations because of infrastructure delivery issues.

Development Plan and costs identified in that?

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

- 2.44 Housing delivery is a product of the selection of housing sites and other windfall sites, site specific considerations on lead-in times which can include on strategic scale sites significant infrastructure requirements and costs.
- 2.45 We consider the housing trajectory in more detail to Matter 8 questions which will be for a future paper.
- 2.46 In Matter 4 a related question on the stepped housing requirement is posed which also affects the housing trajectory, both as altering the target (lowered) and being a factor of the site allocations chosen (fewer deliverable in Years 1-5).
- 2.47 We would characterise the housing trajectory and associated delivery in the Plan as a "jam tomorrow" approach. Backloading delivery to later in the plan, potentially storing up delivery problems should market conditions worsen which can lead to shortfalls. This is poor planning in its truest sense and lacks ambition in housing delivery to meet needs.