

Warrington Local Plan Examination

Matters Statements

MATTER 6b – MAIN DEVELOPMENT AREA: SOUTH EAST WARRINGTON URBAN EXTENSION

July 2022

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Issue

Whether the SEWUE Main Development Area (Policy MD2) is justified, effective and consistent with national policy.

(NB. Examination Library reference numbers are provided in brackets after each document referred to in the Matters Statement)

Questions

1. What is the background to the Main Development Area and how was it identified?

- 1.1 The South East Warrington Urban Extension (SEWUE) has been identified as a sustainable urban extension to the south east of the main urban area of Warrington capable of delivering around 4,200 homes of which around 2,400 will be delivered within the plan period. It will enable development to be comprehensively planned with new homes phased in accordance with the delivery of wide ranging supporting infrastructure whilst minimising the impact on the Green Belt.
- 1.2 The SEWUE formed part of the larger Garden Suburb allocation in the previous Proposed Submission Version Local Plan 2019 however this allocation is smaller for the reasons set out in Matter Statement 3.
- 1.3 The High Level Options Assessment remains unchanged from the previous draft of the plan, that is a focus on Green Belt release adjacent to the main urban area with some incremental development within the settlements, and so this area remained an option for development (as detailed in Matter Statement 3). Within the Updated Proposed Submission Version Local Plan 2021 land that was previously allocated as the Garden Suburb was considered as part of the Development Options and Site Assessment Technical Report 2021 (O1). Four options (see Matter Statement 3, paragraph 14.5, for how the four options were determined) within the former Garden Suburb boundary were assessed with the proposed allocation performing best in terms of sustainability appraisal, impact on the Green Belt and the ability to provide the wide range of infrastructure and services to support the new community.

2. What is the basis for the scale of development proposed and is this justified?

- 2.1 The scale of development has been determined by various factors, the main ones being Green Belt boundaries; housing densities and delivery rates; the provision of infrastructure; and land ownership. Various options were considered for the SEWUE boundary, all falling within the previously proposed Garden Suburb allocation. Four options were considered through the options assessment (Development Options and

Site Assessment Technical Report 2021 (O1)) and SA process (Sustainability Appraisal SA Report 2021 (SP3)), each offering a variation on the number of homes which could be delivered.

- 2.2 Land ownership was a factor in determining these options, along with spatial considerations and overall land take. In addition regard was had for the density of development which will vary across the site but will need to respect the location of the allocation on the edge of the existing urban area and adjacent to the remaining Green Belt.
- 2.3 As detailed in Matter Statement 3 and the Development Options and Site Assessment Technical Report 2021 (O1), the chosen option, Option 2, was concluded to be the preferred option for a number of reasons. Option 2 performed strongly due to its robust Green Belt boundaries and general impact on the Green Belt; it also includes the weakest performing areas of Green Belt around Grappenhall Heys and does not give rise to the loss of any strongly performing GB parcels. In addition, Option 2 involves a minimal number of landowners/site promoters to facilitate delivery and the allocation has the ability to deliver the necessary infrastructure to support the overall development. As a result, the allocation site has the ability to deliver 2,400 homes over the plan period but a total of 4,200 with development continuing beyond the plan period. The Council is confident that this is the best way to ensure robust Green Belt boundaries over the longer term in this location.
- 2.4 The level of new housing proposed will provide a 'critical mass' which will facilitate infrastructure delivery and the provision of supporting infrastructure to help realise the ambition of creating a sustainable new community. Such an approach is consistent with NPPF Paragraph 73 which recognises that the most sustainable approach to new infrastructure delivery may be through a large extension to an urban area or creation of a new community.
- 2.5 The Council has worked closely with those promoting the SEWUE (Homes England as landowner and Miller Homes representing a further three landowners – parties referred to here as the principal landowners for ease) to ensure that the scale of development is realistic and deliverable. This has culminated in the production of the South East Urban Extension - A Deliverable Proposition 2021 (MP1) produced by Homes England and Miller Homes.

3. What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?

- 3.1 As set out in the Green Belt Assessment – Garden Suburb Options 2021 (GB1) (Pages 19 and 20) the allocation comprises weak and moderately performing Green Belt parcels.
- 3.2 In terms of altering the Green Belt in this location the new Green Belt boundary would be defined by the M56 and B5356 Stretton Road to the south, and Lumb

Brook Road, Broad Lane, Green Lane, The Gorse woodland and further sections of dense woodland to the east which represent recognisable and permanent boundaries. The remainder of the eastern boundary consists of sections of field boundaries and the south eastern boundary consists of a field boundary. These would need to be strengthened to create a new recognisable and permanent Green Belt boundary.

4. What would be the effect of developing the site on the purposes of the Green Belt?

4.1 The Green Belt Assessment – Garden Suburb Options 2021 (GB1) report confirms that development of the allocation would result in some encroachment into the countryside however development would not represent unrestricted sprawl as it would be reasonably contained by the existing urban area and well defined along a number of strong permanent boundaries. It further concludes that development in this location would be consistent with the historic context of the Green Belt and the intentions of the New Town Outline Plan. The remaining surrounding Green Belt could continue to perform its Green Belt function. The removal of this site from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt.

4.2 Full details of the effect of developing the site on the five purposes of the Green Belt are detailed in the Green Belt Site Selection – Implications of Green Belt Release 2021 (GB3) document.

5. Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?

5.1 Yes – this is fully considered in Matter Statement 3 (Q3). The SEWUE will ensure that a major proportion of Warrington’s need for housing can be met sustainably through comprehensive planning and infrastructure delivery. The scale of the urban extension will also provide capacity for growth well beyond the Plan period, ensuring the permanence of the revised Green Belt boundaries.

5.2 The allocation is also an important component of the Plan’s overall spatial strategy which will enable the creation of new sustainable communities but in a manner which will support the delivery of strategic infrastructure required to address existing issues of congestion and unlock major development sites with significant brownfield capacity.

5.3 These provide the exceptional circumstances required to justify the removal of the SEWUE from the Green Belt.

6. What is the approach towards Green Belt compensatory improvements? Is this sufficiently clear?

6.1 The Council acknowledges that the approach to Compensatory Green Belt improvements could be clearer in the Policy. As such the Council is proposing a modification to clarify that in the first instance improvements should be made in the

immediate vicinity of the site and delivered by the developer. The Council will then consider improvements in the wider area where it can be demonstrated that the improvements cannot be delivered in the immediate vicinity of the site or where this will provide greater benefits. Financial contributions will only be considered where this would help to ensure that the benefits of compensatory improvements can be maximised by providing them in a more appropriate location.

- 6.2 The proposed wording for the modification is detailed at paragraph 12.1 below.
- 6.3 Through engagement with the principal landowners, the Council is confident that the allocation is able to deliver compensatory Green Belt improvements immediately adjacent to the site. The principal landowners also control land in the wider area where further improvements could be delivered if required. The precise solution will be set within the Development Framework for the SEWUE.
- 7. What is the background to the specific policy requirements in Policy MD2.3? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?**
- 7.1 The specific policy requirements either relate to the Local Plan objectives, for example the creation of new sustainable neighbourhoods, the type and tenure of homes to be delivered, or to ensure appropriate mitigation in bringing the site forward for development and addressing site constraints. The requirements have been established taking into account the Council's evidence base and site assessment work, engagement with the principal landowners, engagement through the Duty to Cooperate and feedback from previous rounds of consultation. The Council considers the requirements are clear, justified and consistent with national policy.
- 7.2 The policy provides clear guidance and requirements on what the Council expects will be delivered as part of the urban extension. Further details will be confirmed through the Development Framework.
- 8. Does Policy MD2 identify all appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?**
- 8.1 The Council has established infrastructure requirements for the allocation and associated costs through ongoing engagement with infrastructure providers (e.g. National Highways, CCG/NHS) internal Council services and partner services and the principal landowners throughout preparation of the plan. Given the location of the site and scale and nature of the allocation, along with the significant level of objection received from the public relating to infrastructure concerns, it is essential to ensure that the necessary infrastructure will be delivered to mitigate the impact of development.
- 8.2 The scale of development proposed at the SEWUE is such that a significant level of new infrastructure is required to support the urban extension and to ensure that the existing urban area of South Warrington is not put under undue pressure in terms of

its current services and infrastructure. Indeed, three non-Green Belt sites adjacent to the proposed urban extension, and also in Homes England ownership, have received planning permission over recent years and have now either been delivered or development is currently underway. These sites have taken up remaining capacity within, for example, local schools, health facilities and the local highway network and so it is essential that the SEWUE delivers the necessary infrastructure to mitigate its own needs.

- 8.3 The Council has secured S106 funding from the non-Green Belt sites to expand Grappenhall Heys Primary School and Bridgewater High, taking advantage of the sixth form being removed from the school site. These expansions are however to meet the needs from the consented development. There is no further expansion potential at any other primary school serving this area. Further expansion at Bridgewater to serve any significant additional development over and above that already consented would be physically difficult and raise issues in terms of the operation of the school. In consultation with the Council's Education Officers and taking into account existing and forecast capacity at other secondary schools serving south Warrington, it is essential for onsite provision of a new secondary school of a minimum of 4FE and two new primary schools of minimum of 2FE with the potential to expand to 3FE to meet the needs of the allocation.
- 8.4 The transport and accessibility requirements have been established to support the delivery of the allocation and meet the sustainable travel objectives of the Draft Local Plan (as set out in policy INF1) and the approved Local Transport Plan 4. The requirements have also been established in the context of the detailed transport assessment work that was undertaken in support of the assessment of the non-Green Belt housing sites. The highway elements of the transport and accessibility requirements have been included in the traffic modelling exercise to assess the impact of the draft local Plan. The analysis carried out as part of this work confirms that the development traffic effectively uses the new enabling infrastructure and that this infrastructure largely mitigates the impact of the development. The implementation of these measures is proposed in phases, but critical elements of the package are required to be delivered in advance of any significant housing delivery to ensure there is no significant harm to the highways network.
- 8.5 The Council acknowledges that in partnership with Homes England, the NHS is currently planning to provide a new health facility at Appleton Cross to mitigate the impacts of the non-Green Belt sites currently under construction. The NHS has confirmed that in support of the SEWUE allocation, their preference is for this facility to be expanded to serve the new residential population, with additional health provision to be co-located within the future leisure facility. The Council accepts that this will require a modification to Part 3 of the Policy to confirm the NHS requirements.
- 8.6 All infrastructure requirements are set out clearly in the Policy whilst recognising that some matters will need to be reviewed on an ongoing basis given the phased delivery of the allocation. The Council accepts that the wording in the supporting

text should clarify the need for infrastructure requirements to be kept under review, as detailed in paragraph 12.2 below, with any subsequent updates being dealt with through a review of the Plan. The IDP will also be updated on an ongoing basis and details of the proposals will be firmed up in preparing the Development Framework.

- 8.7 The majority of infrastructure is intended to be delivered or funded by the developers promoting the allocation and the Local Plan Viability Assessment August 2021 (V2) demonstrates this is viable.
9. **Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council's response should address key issues raised in representations.**
- 9.1 **Concerns were raised regarding the proposals threatening the individuality of the villages in south Warrington, including Appleton Thorn, Wright's Green and Grappenhall which will become one big urban area with no identity.** In assessing options for the spatial distribution of development, the Council has considered a wide range of environmental, social and economic impacts. The Council acknowledges that that the development proposed will change the character of areas of south Warrington that have been allocated for development. The Council has however ensured that the allocation policies include specific provision to protect heritage assets, ecology and the distinct identity of established communities. New development will be required to be built to high design standards, include extensive areas of open space and provide compensatory Green Belt improvements. In preparing the Plan, the Council has worked closely with statutory consultees including Historic England, Natural England and the Environment Agency to ensure the potential impact of development has been appropriately assessed and that mitigation measures are to the required standard. It should also be noted that the proposed SEWUE provides a significant buffer between the proposed urban extension and the villages of Appleton Thorn and Grappenhall. In addition where new development is proposed close to existing homes, residential amenity will be carefully considered through the preparation of the Development Framework at planning application stage.
- 9.2 **Concerns were raised regarding the impact of the development on the natural environment including existing green infrastructure, local wildlife sites and ancient woodland.** The Council acknowledges the presence of a significant amount of existing green infrastructure in the area, including designated sites, and there is no reason why this cannot continue to be provided within the SEWUE. Policy MD2 seeks to incorporate areas of existing green infrastructure, including local wildlife sites and areas of ancient woodland, into the overall allocation. Such areas will continue to be protected under the provisions of Policy MD2 and through the forthcoming Development Framework.
- 9.3 **The issue was raised that the proposed plans will have an impact on air quality in South Warrington.** The Local Plan Air Quality Modelling Report undertaken for the previous PSVLP (2019) concluded that the burden of poor air quality on population

health is expected to reduce in Warrington considerably in the future, as emissions are reduced, largely due to improvements in vehicle emissions outweighing increases in the number of vehicle journeys. However, the Report highlights the health threat posed by particulate matter. As such the Council is committed to implementing the actions of its Air Quality Action Plan, to ensure that opportunities to improve air quality are fully realised. The Council has not undertaken a full review of the Local Plan Air Quality Modelling report given the UPSVLP (2021) is proposing a lower level of development. The existing report is therefore considered to assess a 'worst case' scenario. Updated air quality modelling has however informed the Updated Habitats Regulation Assessment 2021 (SP12). Policy MD2 includes a range of measures to promote active transport, including walking and cycling, and improve public transport serving the allocation and surrounding area together. Together these measures will have a positive impact on air quality.

- 9.4 **A further concern relates to lack of details with regard to additional canal crossings, referring to both the Manchester Ship Canal and the Bridgewater Canal.** Whilst transport modelling shows that a further Ship Canal Crossing is not critical to support development in the Plan Period, it is acknowledged that north-south connectivity does need to be improved in the longer term. This is identified in the Local Transport Plan which also commits the Council to start work to test the feasibility of a new mass transit system for the Borough. Whilst specific details of a connection across the Bridgewater Canal and/or Ship Canal have not yet been identified, Policy MD2 requires that contributions are made towards this so that it can be utilised when the Council is in a position to take this forward. This position will continue to be monitored.
- 9.5 **There were additional concerns raised over the types of houses proposed in the SEWUE in that they will not in keeping with the area; will be too expensive; will not be suitable for first time buyers; and, in particular, highlighting a need for high quality flats and bungalows.** The Council recognises that new development in South Warrington must meet a range of needs and in particular recognises the high property values in this area. The allocation policy has specific requirements to address the needs of first time buyers, affordable housing needs more broadly, housing for the elderly and accessible and adaptable homes suitable for all users. The policy, together with Policy DEV2, further seeks to ensure that affordable homes are genuinely affordable to local people in this part of the Borough.
- 9.6 **The impact of the SEWUE on the historic environment was also raised as a concern.** The Council has undertaken a Heritage Impact Assessment of the proposed SEWUE in consultation with Historic England. Development within the SEWUE will be required to be designed in order to ensure that heritage assets and their settings are conserved and, where appropriate, enhanced within the context of the overall development, through appropriate mitigation measures, having regard to Heritage Impact Assessment.
- 9.7 **The issue of significant areas of flood risk in South Warrington and the fact that proposed development would worsen the situation was also raised.** The Council

has undertaken a Strategic Flood Risk Assessment in considering potential development allocations in the updated PSVLP. The vast majority of the SEWUE allocation is in Flood Zone 1. The allocation policy requires a site-wide foul and surface water strategy across the SEWUE, incorporating appropriate Sustainable Drainage Systems (SUDS) and flood alleviation measures. The surface water strategy will be required to improve on greenfield run-off rates and this will be subject to assessment at planning application stage. As such the Council is confident that there will not be increased flooding as a result of the proposed allocation.

- 9.8 **Specific concerns were raised about Green Lane and how this will be impacted by the development as it is a valuable and well used walkway.** Policy MD2 includes a range of measures to promote active transport, including walking and cycling, with an emphasis on linking the new development to existing routes and existing green infrastructure where possible, as well as enhancing this provision throughout the urban extension. The next stage of work will involve the preparation of a Development Framework which will include a greater level of detail as to what exactly will be delivered within different parts of the SEWUE. There will be a further opportunity to comment on this document as it is being prepared.
- 9.9 **There is concern over the nature of the proposed local centres and concerns they could result in 'out of town' retailing.** Policy MD2 is clear at point 16 that the Urban Extension should provide local shops and appropriate local services and community facilities. Further detail on the location of the local centres and their respective uses will be provided in the Development Framework. The Policy makes specific reference to Policy DEV5 to ensure that new retail development is of an appropriate scale for the local centres.
- 9.10 **Further concerns were highlighted regarding the impact of development on Stockton Heath.** The impact of the SEWUE on nearby villages and centres has been considered as part of the Local Plan options assessment process. The allocation requires the provision of additional local centres to provide community facilities which will complement those available in Stockton Heath. In terms of congestion, the Updated PSVLP 2021 closely reflects the Council's Local Transport Plan (LTP 4). This is to ensure that investment in transport infrastructure helps to deliver the Local Plan's Spatial Strategy and that the Main Development Areas, including the SEWUE, and other allocations in the Plan are able to be well served by public transport. Policy MD2 includes a range of measures to improve public transport serving the allocation and surrounding area together. LTP4 commits the Council to start work to test the feasibility of a new mass transit system for the Borough and the allocation policy requires on site safeguarding of potential mass transit routes. The modelling carried out for the draft Local Plan, using the Warrington Multimodal Modal Transport model, acknowledges that certain parts of the network, including the A49 will need further assessment and targeted interventions throughout the course of the plan's delivery.
- 9.11 **Cheshire Constabulary considers that the impact of this site upon Police and other Emergency services is not recognised or accounted for. The needs of all other**

services/infrastructure is addressed in the policy and therefore it is requested that the policy be amended to address this additional specific need. The Council will engage with the Cheshire Constabulary to consider their future needs but there is no evidence to demonstrate that any specific provision needs to be made as part of this allocation.

9.12 Other more general plan-wide concerns have been raised as to provisions within the plan for biodiversity net gain and the impact of the spatial strategy on access to minerals and resources. These issues have been addressed in Matter Statement 12 (Q18, 19 and 20) and in Matter Statement 13 (Q8).

10. Is the development proposed viable and deliverable as anticipated within the plan period? What is the situation in relation to land ownership and developer interest?

10.1 The Local Plan Viability Assessment August 2021 (V2) confirms that the SEWUE allocation is viable (see Section 8 of the report). Through the Local Housing Needs Assessment (2021) (H2) and options assessment process, the Council is confident there is a need for the homes proposed to be delivered in the plan period.

10.2 The allocation as a whole is available and is being actively promoted by Homes England and Miller Homes through the Local Plan process, as demonstrated through the South East Warrington Urban Extension - A Deliverable Proposition 2021 (MP1).

10.3 It should be noted that the allocation is capable of delivering 4,200 homes in total and 2,400 of these within the plan period.

11. How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?

11.1 To ensure a coordinated approach to the delivery of the allocation, the principal landowners will be required to prepare a Development Framework to address the site wide requirements of the policy, relating to access, transport improvements, social infrastructure, green infrastructure and utilities. The Development Framework will be subject to consultation and will need to be agreed with the Council and key stakeholders, including Highways England, prior to development coming forward. Once agreed, the Development Framework will enable individual development proposals to come forward within the allocation in a coordinated manner.

12. Are any main modifications necessary for soundness?

12.1 The Council acknowledges that the approach to Compensatory Green Belt improvements could be clearer within the Policy. As such the Council is proposing the following modification to Part 26 of Policy MD2:

A scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt will be required. **In the first**

instance, the improvements should be made in the immediate vicinity of the site and delivered by the developer. The Council will consider improvements in the wider area where it can be demonstrated that the improvements cannot be delivered in the immediate vicinity of the site or where this will provide greater benefits. Financial contributions will **only** be considered where this would help to ensure that the benefits of compensatory improvements can be maximised by providing them in ~~the most~~ **a more** appropriate location.

- 12.2 The Council accepts that the wording in the supporting text should clarify the need for infrastructure requirements to be kept under review, with any subsequent updates being dealt with through a review of the Plan. To this end the Council is proposing the following text is added to paragraph 10.2.25 within the supporting text to Policy MD2:

The allocation Policy, together with the Council's Infrastructure Delivery Plan, set out the key infrastructure requirements to support the SEWUE. **The IDP will be kept under review and any changes to the policy requirements will be confirmed through future reviews of the plan.**

- 12.3 To confirm the NHS's preferred approach to meeting future primary care needs, the Council is proposing a modification to include an additional bullet under Part 3 of Policy MD2:

Contribution to expansion of proposed Appleton Cross GP facility.

- 12.4 As a result of concerns expressed by Natural England regarding the potential in-combination impact of the Local Plan on Holcroft Moss within the Manchester Mosses Special Area of Conservation, the Council is currently working with Greater Manchester Combined Authority (GMCA) on potential mitigation measures for the moss. The Council is therefore proposing a modification to the Plan, and specifically a modification to Part 40 of Policy MD2, which will require a project level HRA to be undertaken and, if required, provide a financial contribution towards appropriate mitigation measures. The mechanism for establishing any required contribution from individual developments and how this will be used to undertake the mitigation could then be set out in an SPD and therefore an addition to the supporting text will need to be made referring to this.