

# Warrington Local Plan EiP

## Matter 6b: Main Development Area: South East Warrington Urban Extension

On behalf of Taylor Wimpey, Bloor Homes, Lone Star Land and  
Mulbury (Grappenhall) Limited.

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## Document Management.

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# 1. Matter 6b – Main Development Area: South East Warrington Urban Extension

## Q1. What is the background to the Main Development Area and how was it identified?

- 1.1. We refer the Inspector back to our Regulation 19 representations on behalf of the consortia comprising of Taylor Wimpey, Lone Star Land Limited, Bloor Homes and Mulberry Homes (Grappenhall) Limited, who all control land within the original Garden Suburb proposals for this area and land directly abutting the South East Warrington Urban Extension ([see Appendix 1 of Reg 19 Reps](#)).
- 1.2. Appendix 3 of our representation provides the background to the proposals in the context of the emerging local plan policies and evidence base. It highlights the fact that the Council's evidence base and past Sustainability Assessments continually identified larger growth options in this area as being the most sustainable, hence why the Garden Suburb options were presented as the preferred options at the Regulation 18 (July 17) and first draft Regulation 19 (March 19) consultation versions of the Local Plan.
- 1.3. The Council only began to downsize their aspirations for the Garden Suburb further to delays in submitting the Local Plan and upon notification that their minimum annual housing requirement was going to fall year on year due to the shortfalls of the Standard Methodology.
- 1.4. As per our response to Matter 2, such decisions were taken without considering what was the best way in which to plan for the future of this important and unique part of Warrington. This results in an unsound allocation in that it is not justified and does not represent the most sustainable development option for South East Warrington.
- 1.5. Our position is that it is fundamental that this part of Warrington is planned for in a comprehensive way because it is subject to:
  - A) the lowest ranking Green Belt contribution compared to other quadrants/parcels around Warrington ([see Figure 10, page 21, Reg 19 reps](#)). If ill planned now, this has a high potential to lead to longer term adverse consequences on the Green Belt around Warrington and could impede the ability for the settlement to sustainably grow in the future.
  - B) longstanding plans to see strategic highway infrastructure delivered between the A49 and A50, dating back to the Warrington New Town Masterplan, 1974 ([see Appendix 3, page 12, Reg 19 reps](#)) and consistently depicted through all of the Council's prior evidence base for the Garden Suburb as being a critical piece of infrastructure ([see Appendix 3A and 3C, Reg 19 reps](#)). The Council's policy and evidence base still confirms this link is required ([see Appendix 8, Reg 19 reps](#))
  - C) longstanding plans to see a mass transit network delivered to this location including the provision of a park and ride facility towards Junction 20 M6 within the 2019 Local Transport Plan ([see Figure 7, Appendix 3 of Reg 19 reps](#)). Such a facility could have been delivered on Taylor Wimpey's controlled land at J20 ([see Appendix 1 land ownership plan and Parcel E7 on Figure 5.7 in Appendix 3C, page 63 of Reg 19 reps](#)).

- 1.6. Together, these highlight compelling reasons as to why it is critically important to provide a comprehensive, long term (30+ year strategy) for this unique and particularly important area of Warrington. Indeed, the evidence and background for such a strategy all points to a comprehensive scheme including land to the east up to the A50 as being the most sustainable long term growth option for Warrington. Such a strategy is precisely what Central Government have sought to capture by introducing paragraph 22 of the NPPF, which states:

*'Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.'*

- 1.7. Whilst the extended 30+ year timeline is an important addition to the NPPF, it is essentially saying the timeframe will be whatever it takes to comprehensively plan for new settlement or significant extensions in order to achieve sustainable development. The critical message is that the Council needs to anticipate the long-term requirements and opportunities arising from major infrastructure improvements and determine what it will take to deliver them.
- 1.8. The Council identified their longer term vision through its adopted local transport plan and previous iterations of the draft local plan and the masterplan evidence base for the Garden Suburb proposals. These included centrally located community and town centre uses and open space facilities, that were all connected by the required road and mass transit infrastructure and connected neighbourhoods (see [Appendix 3A and 3C, Reg 19 reps](#)).
- 1.9. Importantly, this is all located on land that was in the full control of interested parties identified on the plan at [Appendix 1 or our Reg 19 reps](#) and was therefore a perfectly deliverable masterplan (further illustrated by the Pegasus plan at Appendix 1 of our Reg 19 reps).
- 1.10. As part of this submitted plan, the Council have simply cored out the middle of previously consulted masterplan at South East Warrington/Garden Suburb and have not then provided the evidence as to how that approach will then deliver the required infrastructure that needs to run between the remaining parts. The strategy for the SEWUE and South East Warrington Employment area are therefore the exact opposite of what the NPPF is seeking to achieve under paragraph 22 and other policies seeking to deliver genuinely sustainable development.

**Q2. What is the basis for the scale of development proposed and is this justified?**

- 1.11. We reserve the right to further respond at the Examination on this point once we see the Council's response. In the meantime, we direct the Inspector back to our Regulation 19 representations, Appendix 4, which highlights the Council's previous Sustainability Assessments have all pointed towards a larger scale development in this location representing the most sustainable development option (i.e. up to 7,064 to 8,791 homes) utilising land up to the A50 that could be delivered without undue adverse social or environmental impact). Also [see our response to Matter 2](#).

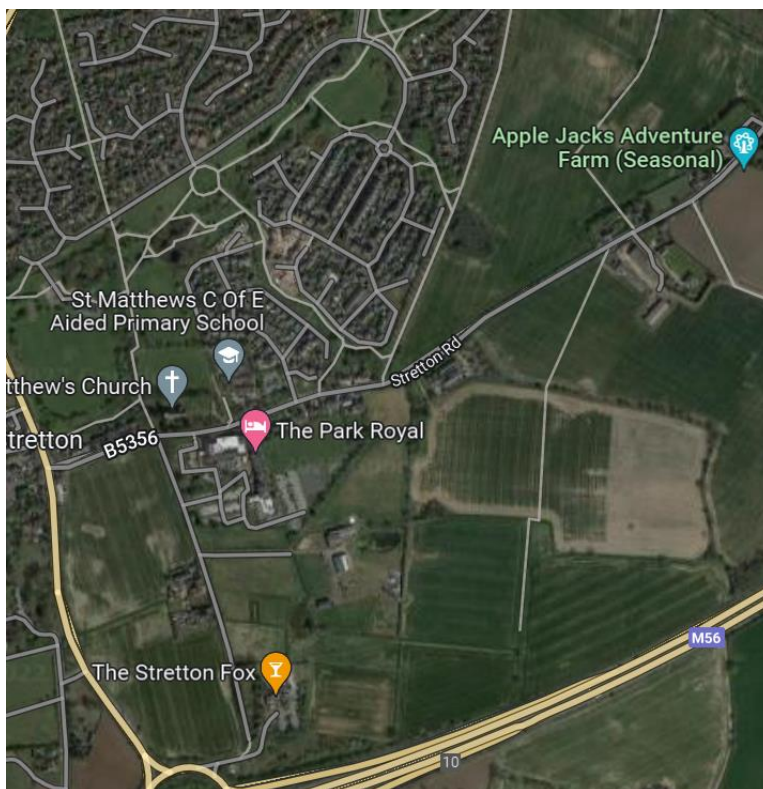
- 1.12. This is because a larger more comprehensive plan for the area will deliver wider infrastructure delivery benefits including necessary highway connections, mass transport routes and other sustainable connections.

**Q3. 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?**

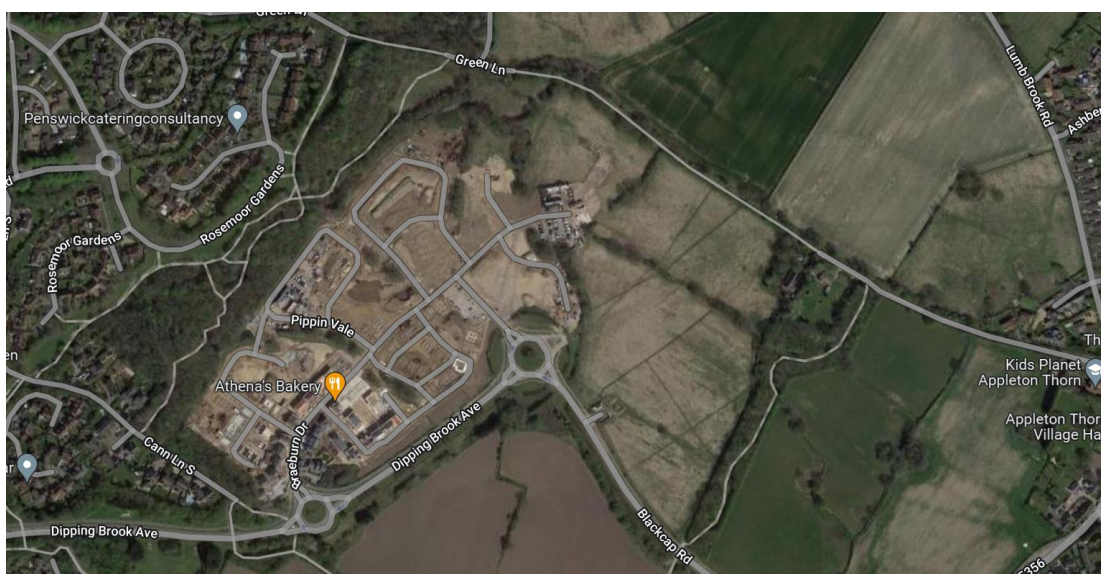
- 1.13. With regard to the wider strategic Green Belt Parcel 10 for this area (comprising of land between the existing urban edge and the M56 and M6) (i.e. the majority of the former Garden Suburb area), the Council's evidence base confirms that it is only one of two parcels that makes a 'weak' to the Green Belt, which is the lowest ranking. The only other strategic parcel which is ranked the same suffers from extensive flooding and ecological constraints.
- 1.14. With regard to the proposed site allocation, we note the Arup 26<sup>th</sup> August 2021 assessment on pages 6 to 8. The conclusion states the following:

The sites which comprise this allocation made a weak and moderate contribution to Green Belt purposes. Development of this 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. 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. The new Green Belt boundary would be recognisable and permanent being strongly defined to the south, west and east by the M56, B5356 Stretton Road, Blackcap Road, Broad Lane, A49 Tarporley Road, the Gorse woodland and further sections of dense woodland. **Parts of the eastern boundary and the south eastern boundary which currently consist of field boundaries would need to be strengthened to create a new recognisable and permanent Green Belt boundary.'**

- 1.15. We do not consider this accurately describes the existing and proposed position and would urge the Inspector to review the plan provided on page 6 with aerial imagery.
- 1.16. Starting at the south towards Stretton and Pewtespeare around the land controlled by Miller Homes (see image below), we accept that the existing Green Belt boundaries are less well defined given large areas of open space located north of the B5356 are included within the existing define urban area, yet existing buildings such as the large hotel and church and other buildings located either side of the B5356 are all located within the existing Green Belt. This lends itself to some confusion as to what is and isn't in the Green Belt here and poorly defined boundaries. We accept an extension of the urban area up to the M56 in this location would undoubtedly create a much stronger and permanent Green Belt boundary compared to what exists now.



- 1.17. Moving north to the land that is currently being developed for new housing (see image below), strong boundaries are provided by Dipping Brook Lane, Black Cap Road and a woodland belt to the east preventing merger with the village of Appleton Throne, which has much less well defined boundaries in most directions. We note the intention here is to extend the Green Belt boundary south to Stretton Road / B5356. Whilst this is arguably not as strong as the aforementioned roads defining the existing boundary it is not as well landscaped with hedgerows and because it includes some existing buildings on its southern site, we accept that it will still provide an obvious/logical boundary.



- 1.18. Moving further north again towards Grappenhall Heys (see image below), Dingle Brook runs along the eastern edge of the existing main urban area of Warrington and this is populated with a very strong woodland belt and associated parklands. At its narrowest point, the woodlands/parklands are 50m wide and in some locations they extend to 150m+. This creates a very strong and permanent boundary to the existing main urban of Warrington in this location and largely blocks out the urban area from view when stood in the open fields within the proposed allocation.
- 1.19. At the most northern point, the Green Belt boundary is defined by the Canal and to the south of that are open playing fields and Stokcton Lane. However, it is the canal itself that provides the existing strong and permanent boundary in this location.
- 1.20. The village of Grappenhall Heys includes land that is and isn't yet developed that is not within the Green Belt. To the north and east boundary are 60m+ wide mature woodland belts that create strong defined boundaries in this location. The southern boundary is also partly defined by woodland belts but there are gaps evident where the planned strategic road connections have obviously been allowed for in the master planning of the village. The villages western boundary is more open but still defined by Aston Drive (which is a planted avenue) and Lumb Brook Road. As such, the overall village is well contained by strong boundaries.



- 1.21. In short, the area of land to the north of the proposed allocation is already defined by very strong Green Belt boundaries. As such, strong justification needs to be provided to breach these existing boundaries and when defining the new boundaries, equally or more robust boundaries should be sought so as not to undermine the ongoing future permanence of the Green Belt in this location after the Local Plan has been adopted.
- 1.22. Such an approach has not been applied by the Council or sought to be evidenced by Arup. Indeed, as highlighted in Arup's conclusion copied above, boundaries on the eastern part of

the proposed allocation will have to be strengthened and are undoubtedly weak on the basis that a significant proportion simply follow the Homes England ownership boundaries that comprise of weak field boundaries (many with very limited hedgerows).

1.23. Whilst we accept new planting could be put in place, this will take time to establish, and that approach ignores the guidance in the NPPF at paragraph 143 (f). In light of that guidance and the existing baseline position, the Council's updated Green Belt evidence should have considered options to utilise much stronger Green Belt boundaries located to the east that could be provided by the M6, A50 or the full extent of Broad Lane. At no point, has such an assessment been carried out as the Arup Green Belt Assessments only assess the Strategic Green Belt parcels (i.e. Parcel 10), individual land owner parcels, which don't always follow robust defensible boundaries and then the proposed allocations. This is despite Pegasus Group putting these options to the Council in February 2021 and the Council being aware of collective landowner group interests in promoting all of the land up to Broad Lane and the A50 (see plans 1 and 2 at Appendix 3E of Reg 19 Reprs).

1.24. The extent of the allocation is therefore not justified or in accordance with the NPPF.

**Q4. What would be the effect of developing the site on the purposes of the Green Belt?**

1.25. No comment at this stage and reserve the right to respond to the Council's response at the Examination hearing session.

**Q5. Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?**

1.26. Yes – but the allocation should be extended for reasons previously articulated.

**Q6. What is the approach towards Green Belt compensatory improvements? Is this sufficiently clear?**

1.27. We await the Council's and promotor's response. For now, it is unclear how the proposal seeks to address this matter noting the significant reduction in the scale of the proposal, including the omission of the Country Park set out in the previous proposals and areas of land within this consortia's control that would have been retained in the Green Belt and could be put towards compensatory measures.

**Q7. 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?**

1.28. We reserve comment until we see the Council's and promoters response to this question.

**Q8. Does Policy MD2 identify all appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?**

1.29. No. The policy does not stipulate all of the necessary infrastructure required to be delivered and for items that it does reference, it is not clear how this will be provided or funded. We point the Inspector to Appendix 8 of our Reg 19 representations dealing with the highway impacts of this allocation and specifically address the following aspects of Policy MD2:

- Providing an improved connection from the allocation site to the A50 (Point 27e) and



- On site safeguarding of potential mass transit routes (point 27g).

1.30. Mark Edwards of Mode Transport will speak towards this point at the Examination Session.

**Q9. 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**

1.31. We consider that the Council's approach will inevitably lead to a position where the deliverability of key required infrastructure will become incredibly difficult to deliver in the future (i.e. the east west link through to the A50 and Junction 20 of the M6).

1.32. Indeed, all of Homes England's land interests in this part of Warrington area proposed for allocation yet there is no obligation on the agency to assist in delivering these infrastructure links now (either in terms of financial requirements or land provision) other than the requirement in Policy MD2 Point 27e.

1.33. We note Homes England are seeking to change this requirement through their representations to the policy and only commit to a single lane access/link to the existing B5356. Should Homes England's representations be successful and they deliver or sell all of their land interests within the proposed plan period, the proverbial ship will have sailed and there will be very little opportunity to therefore deliver the link to the A50 and the mass transit routes sought in the Local Transport Plan and the links sought since the New Town Masterplan in 1974.

1.34. If the Council are able to defend their position on Policy MD2 Point 27e and 27g and retain these in the Local Plan, the upshot of that is that will inevitably result in the need to alter Green Belt boundaries again in this location and at the end of the plan period because not all of the land has been identified now to deliver the necessary infrastructure. This is counter to paragraph 143e of the NPPF. Even if the Council disagree and suggest this infrastructure is not required now, the Council should still be safeguarding the necessary land to meet longer term development needs as per NPPF criteria 143a, 143c and 143d.

**Q10. 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?**

1.35. The consortia we represent as well as others that sit outside of it including Hollins Strategic Land, Langtree and others have all previously sought to work together to deliver a comprehensive development for this part of Warrington and on land directly abutting the allocation. Progress only stalled when the Council stalled the submission of the local plan and retracted back on annual housing requirements.

**Q11. 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?**

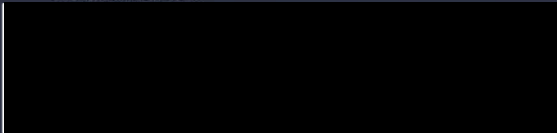
**Q12. Are any main modifications necessary for soundness?**

1.36. Yes. The allocation should be extended and revert back to the previous Garden Suburb proposals advocated by the Council in the 1<sup>st</sup> Regulation 19 consultation version of the plan so the necessary infrastructure required to support the development can be planned for now through the required Development Framework.

- 1.37. Failing an allocation now, there should be clear guidance within the policy and annotations on the proposals map as to how the necessary link to the A50 is to be secured now or in the future (i.e. through safeguarding land for future development needs). In this regard, the Council must consider safeguarding land up to the A50 or at the very least up to Broad Lane / B5356 roundabout in order to have any genuine prospect of delivering the necessary highway infrastructure capable of accommodating mass transit public transport options.

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