

Warrington 'Updated Proposed Submission Version Local Plan' (UPSVLP) (2021-2038)

Examination in Public

HEARING STATEMENT ON BEHALF OF-
HOMES ENGLAND AND MILLER HOMES

(Respondent Refs: 0404 and 0432)

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



Homes
England

MillerHomes



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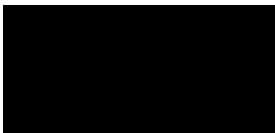
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WSP.com



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1 INTRODUCTION

- 1.1.1. This Hearing Statement (HS) has been prepared by WSP on behalf of Homes England and Miller Homes (HE and MH) in collaboration with BWnS¹.
- 1.1.2. HE and MH are jointly promoting the proposed allocation of land in South Warrington pursuant to Policy MD2 (South East Warrington Urban Extension) (SEWUE). The extent of their land interests is shown at **Appendix 1**.
- 1.1.3. As set out in their joint Regulation 19 Representations (November 2021)² (referred to herein as the “submitted Representation”), they are committed to securing its allocation and, thereafter, ensuring delivery of the SEWUE, including necessary infrastructure to meet the needs of the new development.
- 1.1.4. It is against this context that this HS has been produced, to demonstrate that the SEWUE allocation is deliverable and viable.
- 1.1.5. Notwithstanding, in addressing the relevant Inspectors’ Questions³, it reaffirms where the proposed wording of Policy MD2 would benefit from some modifications to ensure that the requirements of the allocation are clearly written, justified, effective and consistent with national policy. A Statement of Common Ground (SoCG)⁴ is currently being prepared and will identify areas of agreement, including where modifications to Policy MD2 are agreed between WBC, HE and MH.
- 1.1.6. This HS focuses on responding to Inspectors’ Questions 6 to 12 pertaining to Matter 6b.

¹ Barton Willmore now Stantec

² Respondent Ref: 0404 and 0432 – Jointly submitted elements are Document Ref: 0404-P2 and 0432-P2 (Planning Representations) and 0404-P3 and 0432-P1 (Deliverable Allocation Document)

³ Document ID02 Inspectors’ Matters Issues and Questions (MIQs)

⁴ Between WBC, Homes England and Miller Homes

2 QUESTION 6

WHAT IS THE APPROACH TOWARDS GREEN BELT COMPENSATORY IMPROVEMENTS? IS THIS SUFFICIENTLY CLEAR?

- 2.1.1. ¶3(k) of Policy MD2 requires the SEWUE to be supported by 'compensatory green belt improvements'. ¶26 provides further detail.
- 2.1.2. Appendix 2 of the HE and MH submitted Representation confirms that proposed improvements will be identified through preparation of the proposed Development Framework (DF) (a requirement of ¶4 of Policy MD2) and, in responding to criterion a) at ¶6 of the Policy.
- 2.1.3. It is understood that WBC is seeking to refine the policy wording of MD2 to reflect the approach that will be taken and the proposed changes will be set out in WBCs HS and agreed by HE and MH through the SoCG.

3 QUESTION 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?

- 3.1.1. HE and MH support delivery of infrastructure in line with Policy MD2, where it addresses evidence of need or impact generated by the proposed SEWUE.
- 3.1.2. There is various criterion listed in MD2.3 which HE and MH consider would benefit from modification to the current wording, largely to remove duplication with the requirements of other policies and ensure consistency with national policy (in particular, DEV2, DEV5, ENV2 and ENV7). These points were sufficiently highlighted and explained within the submitted Representations and are therefore not repeated here. However, a full schedule of all proposed modifications (including HE and MH view as to whether these are main or minor modifications) as per the submitted Representation is provided at **Appendix 2**.
- 3.1.3. This section focuses on those aspects of Policy MD2.3 specifically, which HE and MH consider require modification to be justified and consistent with national policy and/or to be clear and effective.

COMMUNITY FACILITIES

Primary and Secondary School Provision (¶13 and 14)

- 3.1.4. HE and MH agree that based on the available evidence from WBC and the proposed scale of the SEWUE, there will be a requirement for new primary and secondary school places to meet the need arising from its development. MP1 confirms that 12.32 Ha⁵ has been identified to facilitate delivery of new schools of the scale stated in policy.
- 3.1.5. It is agreed that the primary school requirement will need to be met on-site reflective of current known capacity constraints and limitations on the further expansion of existing school sites. This will ensure that appropriate accessibility standards (including by walking) for the location of new primary schools can be suitably accommodated. While MP1 shows potential indicative locations, the precise location of these schools will be confirmed in the DF and future planning applications.
- 3.1.6. At this time, HE and MH consider that WBC's evidence supporting the secondary school requirement detailed in MD2 is out of date and needs to be updated and refined.
- 3.1.7. On this basis, HE and MH do not consider it justified for the policy to be explicit in the precise number and size of schools required. Instead, this is a matter that can and should be dealt with through the DF. HE and MH have suggested alternative policy wording in submitted Representations so that the need to provide for education needs arising from the SEWUE is

⁵ Table 2, Page 7 of 'A Deliverable Proposition'

properly recognised, but the detail of the requirement(s) and how these are met is dealt with at the DF stage.

- 3.1.8. If a new secondary school site is required and there is no suitable alternative location for this (outside of the SEWUE), MP1 demonstrates that sufficient land can be provided on site. However, its actual location will only be confirmed through the DF and its delivery may or may not depend upon other infrastructure being provided in advance (for example, new highways). In this event, off-site provision may be necessary, to meet the needs arising from the development in early phases.
- 3.1.9. It is fully expected that WBC will produce updated forecasts of both primary and secondary school requirements in the locality, considering the most up to date position in respect of the capacity at existing schools and the forecast population of the development reflective of the proposed housing mix and timing of delivery of the SEWUE, both within and beyond the plan period. This will need to be kept under regular review; HE and MH are willing to assist WBC with this task.
- 3.1.10. Financial contributions towards the capital costs of provision to meet need arising from the SEWUE will be secured via S106 Agreement pursuant to the mechanism contained within SPD3⁶.

Leisure and healthcare (¶15)

- 3.1.11. HE and MH are supportive of the provision of health and leisure⁷ capacity to meet evidenced demand arising from the SEWUE. MP1 confirms that sufficient land can be set aside to accommodate a new built leisure facility⁸ (including healthcare provision), if required.
- 3.1.12. Notwithstanding, HE and MH consider that a refined evidence base is needed such that the precise leisure requirement attributable to the SEWUE can be identified and reflected in the next update to the IDP and/or DF.
- 3.1.13. With regards the healthcare element, HE already has available land for a new health centre at Appleton Cross⁹. Whilst this land sits out with the SEWUE allocation, the NHS has confirmed that the current healthcare proposal for Appleton Cross can futureproof the primary care needs arising from the SEWUE development (i.e. its design can be sufficiently flexible to allow expansion of the floorspace up to the totality of that required for the SEWUE). Furthermore, the NHS will only look to bring forward a further separate additional facility (on site within the SEWUE) if there is a requirement and opportunity to do so.
- 3.1.14. On this basis, the proposed wording of the policy at ¶3(d) and 15 should be refined to ensure that it is clear on what is required to be delivered by the SEWUE and the evidence base underpinning this, or to confirm the role of the updated IDP and DF in confirming this in due course. The schedule at **Appendix 2** includes a proposed additional modification to the policy to provide the express clarity required. For the avoidance of doubt, this modification was not put forward as part of the submitted Representation but is included now in light of the updated position of the NHS.

⁶ WBC Planning Obligations Supplementary Planning Document (SPD) (January 2017)

⁷ HE and MH interpretation of the leisure requirement is the provision of built sports facilities within a 'leisure' centre

⁸ Otherwise referred to in the IDP (IN1) as a 'Community Hub', 'leisure/facilities hub' and 'Community Facilities'

⁹ This is being provided to address existing needs in the locality, in part arising from HE's consented sites at Grappenhall Heys, Pewterspear and Appleton Cross (950 homes). Further information on the planning and delivery status of these sites is provided at **Appendix 3a and 3b**.

TRANSPORT AND ACCESSIBILITY

- 3.1.15. HE and MH endorse the principle that development of the SEWUE will be supported by a comprehensive package of transport improvements. Page 11 of MP1 summarises the key aspects of the transport strategy proposed at the current time. This already reflects many of the requirements of ¶27 of MD2.
- 3.1.16. However, as set out in the submitted Representation, the detail of these improvements and how they will be achieved, should be confirmed through the DF, supported by appropriate evidence, with further confirmation of their specification and details of delivery dealt with as part of a subsequent Transport Assessment.
- 3.1.17. Those aspects of ¶27 which HE and MH remain concerned about, in so far as their justification based on up-to-date evidence and understanding of constraints and opportunities, are as follows:
- b) connection to the South East Warrington Employment Area (SEWEA)**
- 3.1.18. It is noted that Policy MD6 ¶12(b) requires the SEWEA to provide linkages to ‘*existing and planned residential areas and amenities*’ clearly in recognition that these are in proximity of the SEWEA allocation. There is no evidence to suggest that the approach to the wording of MD2 cannot mirror the approach to MD6.
- e) improved connection from the allocation site to the A50**
- 3.1.19. The submitted Representation sets out how the current wording is ambiguous and raises the possibility of a requirement to secure third party land.
- 3.1.20. The SEWUE proposals outlined in MP1 make provision for an improved connection from the SEWUE to the B5356 Grappenhall Lane, which ultimately connects to the A50 further east. WBC has previously confirmed its support for this approach and states in SP6¹⁰ that the policy does not require the SEWUE to provide a ‘direct connection’ to the A50. On this basis, the proposed modification ensures clarity when the DF is prepared and in support of future implementation of the SEWUE.
- f) a proportionate contribution to improvements to increase capacity at Junction 10 of the M56 and Junction 20 of the M6**
- 3.1.21. HE and MH do not consider that this aspect of the policy is currently justified for the reasons set out in their submitted Representation.
- 3.1.22. T1[1] states that improvement schemes at the M56 J10 and M6 J20 are included in ‘Development Enablers’ mitigation; however, no details of geographical scope or scale of development assumptions used to define the modelled mitigation are provided. The scenarios where the unspecified improvements are modelled do show benefits to the local road network due to some traffic being drawn to the M56 and M6 and away from local roads. However, the report does not specify where on the network the traffic relief is seen where impacts are attributable to SEWUE or other Local Plan allocations.”
- 3.1.23. Based upon the evidence provided to date, it is therefore unclear what level of impact can be attributed to SEWUE compared to other allocations and wider growth patterns, and therefore how a

¹⁰ WBC Responding to Representations Report

[1] Transport Model Testing of the WBC Local Plan August 2021 inc. appendices a) to i))

proportionate contribution can be defined (noting IN1 Appendix 1 suggests a SEWUE contribution of £5m and £18m respectively, whilst IN1 Appendix 2 suggests £4m for each junction). HE and MH consider that this specific aspect of the policy should be removed.

h) a proportionate contribution towards the delivery of a connection across the Bridgewater Canal and/or Ship Canal

- 3.1.24. T1 does not support the requirement for a further Manchester Ship Canal Crossing at the current time. Therefore, it is unreasonable for WBC to expect any form of financial contribution towards its future delivery (noting Appendix 1 of IN1 suggests a total cost of £55m).
- 3.1.25. With regards the suggested Bridgewater Canal crossing, the position is the same. Notwithstanding, the SEWUE proposal does not prejudice future delivery of a north-south link across the Bridgewater Canal: MP1 provides a safeguarded corridor of land (in so far as this relates to HE and MH land interests) to enable a future strategic connection, if required and justified.
- 3.1.26. As per the submitted Representations, HE and MH do not consider that this aspect of the policy or the financial sum attributed to the SEWUE within Appendix 2 of IN1 (£10m) to be justified.

¶31 (Bridgewater Canal)

- 3.1.27. MD2 requires the SEWUE to contribute towards WBC's wider aspiration of enhancing the Bridgewater Canal as a recreational resource and for the Canal's tow path to provide a cycle and pedestrian route across the Borough.
- 3.1.28. HE and MH recognise the opportunity the Bridgewater Canal provides as a recreational resource and that proposals for the SEWUE should look to ensure connectivity with the wider routes, services, and facilities this provides access to, and will be considered further within the DF. However, MD2 as currently worded is unclear and imprecise, and unlike other infrastructure requirements for the SEWUE, this 'ask' is currently unsupported by IN1 which is silent on the proposed intervention. This aspect of the policy is unjustified absent of up-to-date evidence of the requirement, its direct relationship to the SEWUE and an understanding of the costs and timing of any potential measures required relative to overall viability.

UTILITIES AND ENVIRONMENTAL PROTECTION

- 3.1.29. MD2 ¶36 requires provision of a Community Recycling Centre within the SEWUE.
- 3.1.30. HE and MH do not consider this aspect of the policy (or that which is concurrently set out at ¶3(i)) to be justified for the reasons set out in their submitted Representation.

4 QUESTION 8

DOES POLICY MD2 IDENTIFY ALL APPROPRIATE AND NECESSARY INFRASTRUCTURE REQUIREMENTS? HOW WILL THESE BE PROVIDED AND FUNDED? IS THIS SUFFICIENTLY CLEAR?

APPROPRIATENESS AND NECESSITY OF THE INFRASTRUCTURE 'ASK'?

General comments

- 4.1.1. MD2 is a strategic Local Plan policy which sets out the requirements for development within the SEWUE during the plan period and beyond. Furthermore, ¶4 to ¶6 require a DF to be prepared, consulted upon and agreed with WBC, and that this will be a material consideration in the determination of future planning applications. Against this context, HE and MH consider that as a Local Plan policy, MD2 is sufficiently comprehensive in identifying appropriate and necessary infrastructure requirements to support delivery of the SEWUE.
- 4.1.2. As set out in the submitted Representation, in some instances it is considered that MD2's wording goes 'too far' in prescribing the detail of the infrastructure ask, either because:
- there is not currently an evidence base presented which supports the items either in principle, the specificity of extent, or in timing terms; and/or
 - the level of detail should rightly be considered through the DF process, supported by advanced technical work; and/or
 - the inclusion of some detail in MD2 duplicates or cuts across the requirements of other Local Plan policies (for example, DEV2, ENV2, ENV8 and INF5).
- 4.1.3. Where this is the case, HE and MH has suggested within submitted Representations, alternative policy wording to ensure clarity in the requirements of MD2 and/or that certain aspects of the policy can be properly justified. Specifically, those requirements listed under MD2.3 are addressed in Question 7. Other challenges to MD2 (generally) by HE and MH are set out below.

¶7 and A49 London Road / B5356 Stretton Road (Cat & Lion Junction)

- 4.1.4. In the submitted Representations, HE and MH has raised concern about ¶7 and the restriction on the commencement of residential development until *"the funding and the programme for the delivery of a highway scheme to relieve the A49 London Road/B5356 Stretton Road junction has been confirmed and works have commenced on site. A limit of housing completions will be set until such a scheme is complete and operational."*
- 4.1.5. HE and MH support the provision of a highway relief scheme in this location. However, the parameters of the policy mechanism for controlling development are lacking in precision and justification and are potentially unnecessarily restrictive. Alternative wording has been proposed in the submitted Representations, which provides no less control for WBC than the current wording but provides a clear description of what is required without restrictions that cannot presently be understood or quantified. This will ensure the policy is precise and effective.

¶27, ¶31 and ¶36

4.1.6. Also highlighted in response to Question 7 are those aspects of infrastructure which HE and MH expressly do not consider to be appropriate and necessary, notably the improvements to the strategic highway network ¶27(f); delivery of a connection across the Bridgewater Canal and/or Ship Canal (¶27(h)); enhancements to the Bridgewater Canal (¶31); and provision of a Community Recycling Centre within the SEWUE (¶36). Some of these items are also identified in IN1.

4.1.7. ¶3.3.33 of the Local Plan states:

“The IDP will be subject to continual review and will inform subsequent reviews of the Local Plan. This will enable refinement of the spatial strategy and infrastructure requirements over time.”

4.1.8. Furthermore, ¶7.5.9 of the Local Plan states:

“In accordance with national policy and guidance, infrastructure and viability considerations must be assessed in detail during the preparation of the Local Plan.”

4.1.9. On this basis, whilst it is acceptable for the IDP to identify potential infrastructure items and costs, which may be required in the future (i.e. which are desirable), where there is a lack of up-to-date evidence to relate those items and costs directly to the development of specific allocations at the current time, it follows that it is unreasonable for those items to be directly translated into policy ‘asks’, until such time that the necessary evidence is available and the certainty provided.

4.1.10. HE and MH therefore consider that these aspects of the policy should be removed.

PROVISION AND FUNDING OF INFRASTRUCTURE

4.1.11. IN1 is the current vehicle by which WBC has identified the infrastructure items required to support delivery of the SEWUE and how it is envisaged they will be provided and funded.

4.1.12. **Appendix 4** of this HS lists the infrastructure ‘asks’ within MD2 alongside the relevant delivery and funding information as set out in IN1. It confirms how HE and MH envisage each of the policy aspects being provided and funded and clarifies where there are discrepancies between IN1 Appendix 1 and Appendix 2. It is understood that WBC will be clarifying the purpose of IN1 Appendix 2 in its own HS.

4.1.13. The viability and deliverability of development is addressed in Question 10.

5 QUESTION 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

- 5.1.1. HE and MH have reviewed document SP6, as well as all representations made by third party statutory consultees, MP/Borough Councillor/Town or Parish Council/Council, landowners/developers, and other consultees where comments are made directly in reference to the SEWUE and Policy MD2.
- 5.1.2. HE and MH are confident that MD2, the wider Local Plan policies, alongside the Plan's supporting evidence base, have appropriately captured all potential adverse effects of the development for the plan-making stage. Furthermore, the DF will have an important role in ensuring such matters are suitably addressed from the outset, as well as any supporting Environmental Impact Assessment (EIA) accompanying future planning applications.

6 QUESTION 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?

VIABILITY AND DELIVERABILITY

6.1.1. Savills is advising HE and MH on viability matters relating to the SEWUE. In advance of the submitted Representation, Savills prepared a development appraisal and cost plan for the SEWUE that aligned with the methodology adopted by Cushman and Wakefield (C&W) in their Local Plan Viability Assessment (LPVA) (Ref: V2 and V2a). This demonstrated that the SEWUE is viable.

6.1.2. Savills has since reviewed C&W's LPVA Addendum Report (Ref: V1 and V1a). It has also undertaken an update of its own independent SEWUE appraisal, based upon more up to date information from the HE consented sites in South Warrington.

The updated Savills appraisal continues to demonstrate the SEWUE is viable.

6.1.3. It also confirms the continued strength in demand for land within South Warrington (generally) based not only on the ongoing success of development of HE's consented sites and the rate of sales currently being achieved, but evidence of other sites elsewhere in the locality. For this reason, Savills is confident that the proposed housing trajectory included at Appendix 1 of the UPSVLP is the minimum rate of delivery that can be annually achieved in the plan period and beyond and that more than 2,400 homes can be achieved within the plan period. Further information on Savills' approach is provided at **Appendix 5**.

LANDOWNERSHIP

6.1.4. Homes England owns the freehold title of its land interests, and this makes up approximately 84% of the total proposed SEWUE area. Miller Homes is acting on behalf of the individual freehold interests forming the remaining 16% of the site area.

6.1.5. The plan at **Appendix 1** identifies the land interests relative to the proposed SEWUE allocation boundary, including the additional land controlled by HE beyond this, which could accommodate a variety of SEWUE mitigation measures, as indicatively shown in MP1 and to be confirmed in the DF.

DEVELOPER INTEREST

6.1.6. HE and MH are confident that developer interest in the SEWUE will be strong as per the approach at the HE consented sites (detailed at **Appendix 3b**). It is notable that a number of alternative (omission) sites have been put forward for allocation in the Local Plan by third parties, reaffirming the demand for land and housing development at both a Borough-wide level and in South Warrington specifically.

7 QUESTION 11

HOW IS IT INTENDED TO BRING THE SITE FORWARD FOR DEVELOPMENT? WHAT MECHANISMS WILL THERE BE TO ENSURE A COMPREHENSIVE AND COORDINATED APPROACH TO DEVELOPMENT, ENSURING THAT INFRASTRUCTURE REQUIREMENTS ARE PROVIDED?

- 7.1.1. ¶1.9 to 1.11 of the submitted Representations confirms HE and MH joint working commitments and overall objectives in realising development of the SEWUE. This includes continuing to work extensively together to bring forward a site wide DF, in collaboration with WBC, statutory consultees and local communities, in advance of submitting planning applications for development. The DF has a key role in providing a robust and comprehensive set of guiding principles and parameters for delivery of the SEWUE, including the phasing of development and ensuring the timely delivery of infrastructure in the Plan period and beyond.
- 7.1.2. As per the policy at ¶6(b), the DF will include an updated schedule of infrastructure requirements, supported by more detailed evidence identifying the scale of measures required, the timing of their delivery and how they will be provided and funded (including the provision of any land required) i.e. whether this will be developer led (in-kind) or via a S106 contribution on a pro rata basis.
- 7.1.3. It will also include a Draft Framework S106 Agreement and/or identify the mechanism/formula by which WBC will ensure the timely delivery of infrastructure throughout the lifetime of the development (to 2038 and beyond) using a tariff-based approach, pursuant to ¶6(c) of MD2. This will be underpinned by an arrangement between the landowners/developers to secure the approach to key delivery matters, for example, the requirement to cost share, ensuring that landownership does not represent any impediment to future delivery.
- 7.1.4. Recognising that collaboration will continue beyond the adoption of the DF, HE and MH have already discussed preliminary planning application options for the SEWUE (reflective of the nature of their respective land interests). They will likely advance separate but concurrent applications for development, responding to the DF and underpinned by a common and consistent baseline in terms of environmental and technical reporting, including Environmental Impact Assessment (EIA). There may also be separate early applications for enabling works or infrastructure, where this will assist in accelerating delivery. On this basis, neither HE or MH consider there to be any reason why WBCs trajectory for housing delivery within the SEWUE in the plan period (and indeed beyond) cannot be achieved. Furthermore, HE and MH propose that the anticipated rate of delivery could be exceeded in later years.
- 7.1.5. Applications for development will be determined against the Local Plan, including MD2, and the DF¹¹. It is therefore in everyone's interests to ensure that MD2 and the DF are clear in their requirements and supported by up-to-date evidence. HE and MH will continue to work with WBC to deliver the SEWUE and its infrastructure in a timely manner.

¹¹ Pursuant to Section 96A of the Town and Country Planning Act 1990 (As Amended)



- 7.1.6. HE is the Government's housing accelerator and has the appetite, influence, expertise, and resources to drive forward development of the SEWUE, working in partnership with WBC, Miller Homes and other stakeholders. HE's submitted Representation¹² identified how it accelerates housing delivery on large sites. Key strengths include partnership working; implementation of de-risking strategies; securing early planning certainty; facilitating infrastructure delivery; and working with a diverse range of delivery partners to ensure that housing delivery rates and market absorption thresholds can be kept high.
- 7.1.7. HE and MH have confidence in their ability to continue to collaborate and ensure that all necessary mechanisms are put in place to enable full delivery of the SEWUE.

¹² Ref: 0404



8 QUESTION 12

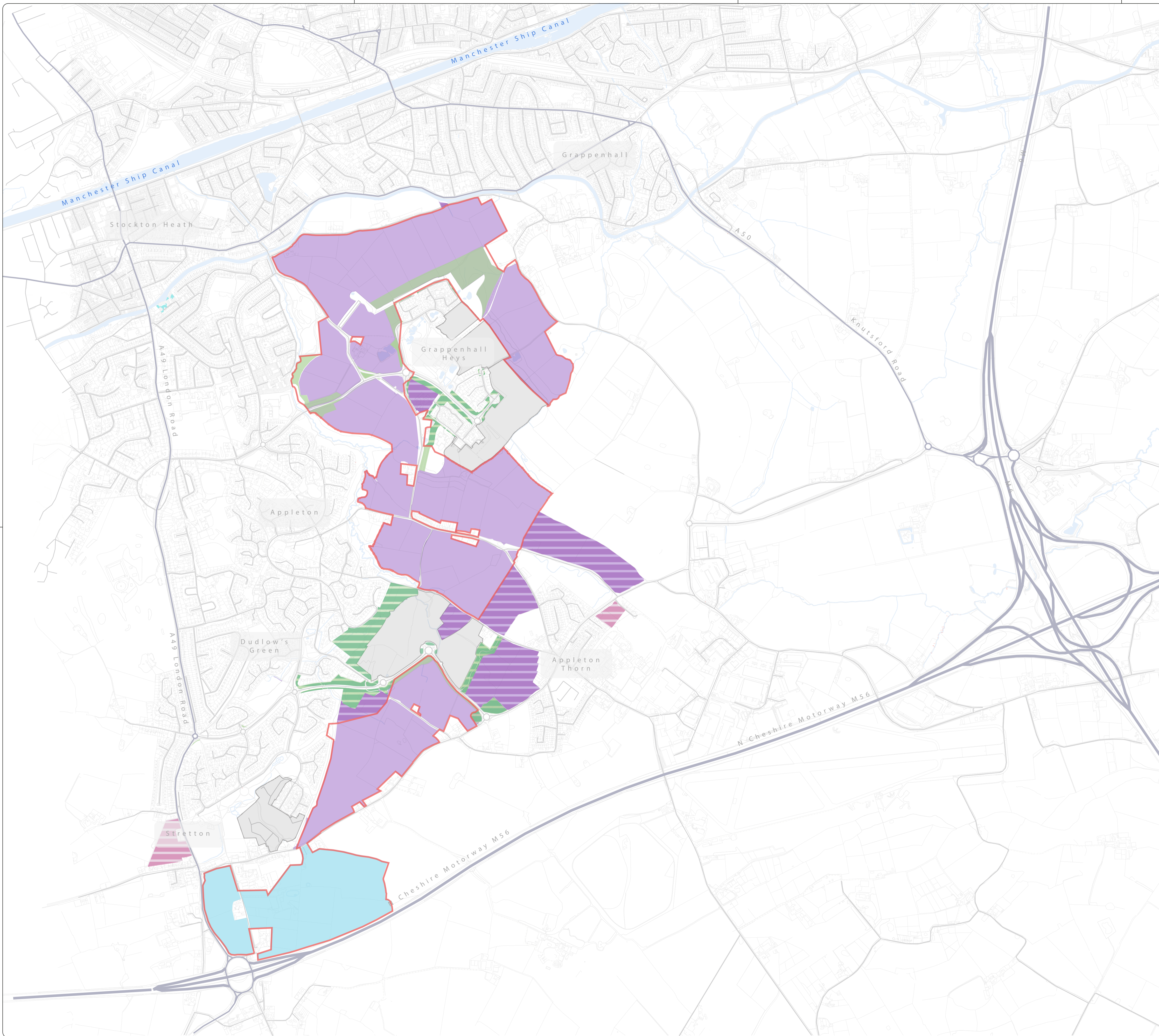
ARE ANY MAIN MODIFICATIONS NECESSARY FOR SOUNDNESS?

- 8.1.1. HE and MH have revisited the proposed schedule of changes put forward in their submitted Representation and identified where these are now considered main modifications. These, along with those considered minor modifications, for completeness, are identified at **Appendix 2**.






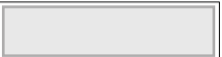


Appendix 1

Homes England and Miller Homes land interests in the SEWUE (Plan Ref: M10372_14)





- Notes**
1. Drawing to be read in conjunction with all other drawings and specifications forming part of the project package.
 2. Do not scale off this drawing.
 3. This drawing must not be copied in whole or in part without prior written consent of Optimised Environments Ltd.
 4. Ownership boundaries provided by Savills / WSP.
 5. Policy MD2 boundary traced from Council website, available at https://mapping.warrington.gov.uk/wm/Map.aspx?MapName=Planning_and_LLC_External

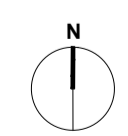
-  Policy MD2 allocation boundary
-  Homes England ownership within Policy MD2 boundary
-  Homes England ownership beyond Policy MD2 boundary
-  Additional Green Belt land within Homes England ownership
-  Miller Homes promotion land within Policy MD2 boundary
-  Approved applications
-  Land Trust Transfer Land within Policy MD2 boundary
-  Land Trust Transfer Land within the immediate vicinity of Policy MD2 boundary



Client
Homes England

Project
South Warrington Urban Extension

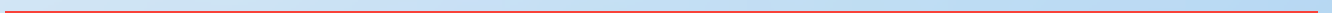
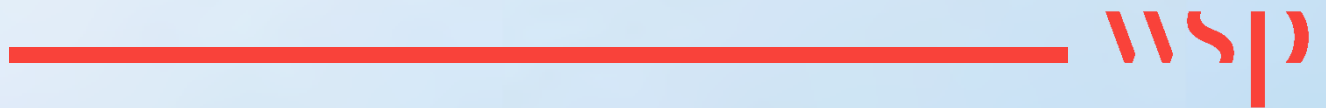
Drawing Title
Land Control Within Policy MD2



Scale	1:10000 @ A1	Date	28 June 2022
By	CMC	Status	FOR INFORMATION
Checked	JF	Approved	MF
Dwg no.	M10372_14	Rev	02

Appendix 2

Schedule of Homes England and Miller Homes suggested policy modifications (as per Regulation 19 Submission)



Appendix 2 – Proposed Modifications to Policy MD2

WUPSVLP Policy / Paragraph	Summary of issue(s)	Proposed Modification to MD2	Minor or Main Modification?
MD2 clause 1.	The policy should refer to the Policies Map rather than the Proposals Map	Land to the south east of Warrington, extending from Grappenhall Heys in the north, to the M56 in the south, as defined on the Proposals Policies Map, will be removed from the Green Belt and allocated as the South East Warrington Urban Extension.	Minor
MD2 clause 2.	The policy should express the Plan Period capacity of the SEWUE as a minimum.	The South East Warrington Urban Extension will deliver a minimum of 4,200 homes in total of which around a minimum of 2,400 homes will be delivered within the Plan Period.	Minor
MD3 clause 3.	The policy should provide more clarity about the role of the Development Framework in the future planning of the SEWUE.	The Urban Extension will be supported by a wide range of development and infrastructure which will be defined as part of the preparation of the Development Framework and subsequent applications for development. <u>This is likely to include: as follows</u>	Minor
MD2 clause 3a.	The policy should make clear reference to policy DEV2 for consistency in dealing with the specific requirements for housing for older people and self and custom build plots.	A range of housing tenures, types and sizes, including affordable homes, custom and self-build plots and supported and extra care housing and and reflective of the requirements of Policy DEV2.	Minor
MD2 clause 3b. & 3c.	The policy should not make reference to the precise education requirements for primary and secondary school capacity, pending collation of further evidence and the preparation of the Development Framework.	Two 2 form entry primary schools, capable of expansion to 3 forms of entry On-site primary school provision based on up-to-date evidence of need. A new On or off-site secondary school provision based on up-to-date evidence of need to provide a minimum of 4 forms of entry.	Main
MD2 clause 3d.	Homes England will provide land for a new health centre at Appleton Cross, which can	<u>A new and expanded health centre at Appleton Cross, and a new leisure facility incorporating health provision, where there is opportunity and a requirement to do so.</u>	Main

WUPSVLP Policy / Paragraph	Summary of issue(s)	Proposed Modification to MD2	Minor or Main Modification?
NOTE: This modification was not included in the Regulation 19 Submitted Representations and is therefore a new suggested modification.	be expanded to cater to the needs of the SEWUE. Additional health provision may be provided within a new leisure centre, if there is opportunity to do so.		
MD2 clause 3e.	The requirement for unspecified "community facilities" within the SEWUE should be removed from the policy unless WBC can evidence or clarify this requirement.	Local shops and other community facilities of an appropriate scale.	Minor
MD2 clause 3i.	Clarity is required around the requirement for a new community recycling centre to be located within the SEWUE, including an updated evidence base, otherwise the policy clause should be deleted.	[A Community Recycling Centre] ¹	Main
MD2 clause 3l.	The word "exemplary" should be removed from the drainage clause of the policy.	Flood mitigation and drainage including exemplary sustainable drainage systems (SuDS).	Minor

¹ As set out in the main body of HE/MH Regulation 19 Submitted Representation, this element of the policy is yet to be justified and linked to evidence of need for this requirement arising from the proposed SEWUE.

WUPSVP Policy / Paragraph	Summary of issue(s)	Proposed Modification to MD2	Minor or Main Modification?
MD2 clause 7.	The revised policy wording is required in relation to the A49/B5356 junction relief scheme, including agreeing a delivery strategy with WBC and setting a limit on occupations until the scheme is implemented.	No residential development will be permitted to commence until the funding and the programme for the delivery of a highway scheme to relieve the A49 London Road/B5356 Stretton Road junction has been confirmed and works have commenced on site. A limit of housing completions will be set until such a scheme is complete and operational. New highways will be provided on site to ensure permeability across the Urban Extension and to provide development parcel access. On-site safeguarding of potential mass transit routes will be implemented. Transport Assessments will identify the full package of highway works required to support the Urban Extension, however, a key intervention will include relief to the A49 London Road / B5356 Stretton Road junction; as a key constraint, a delivery strategy for this scheme will need to be agreed with the Council as a priority, with an appropriate limit on residential occupations to be set until the scheme is implemented.	Minor
MD2 clause 8.	The word “integrity” in relation to development adjacent to the allocation should be removed from the policy.	Any development adjacent to the allocation boundary must not undermine the integrity of the delivery of the South East Warrington Urban Extension.	Minor
MD2 clause 9.	Affordable housing requirements should be set by the Development Framework in a phased manner.	The Urban Extension will provide residential development across a series of new neighbourhoods, each comprising based upon an appropriate mix of housing in accordance with Policy DEV2, including a minimum of 30% provision of affordable housing, in line with the requirements of the Development Framework.	Minor
MD2 clause 10.	Affordable housing requirements should be set by the Development Framework in a phased manner.	Supported h Housing for older people will be required within the Urban Extension. The precise nature of this will need to be agreed with the Council pursuant to Policy DEV2 and based on need and the Council’s broader strategy to encourage independent living.	Minor

WUPSVP Policy / Paragraph	Summary of issue(s)	Proposed Modification to MD2	Minor or Main Modification?
MD2 clause 11.	Affordable housing requirements should be set by the Development Framework in a phased manner.	Specific provision should be made for self-build/custom-build plots in the Urban Extension, subject to demand as demonstrated by the Council's self-build register pursuant to Policy DEV2.	Minor
MD2 clauses 13.	The policy should refer to the need to accommodate on site primary school provision commensurate with the impact of new development, and the need to provide secondary school provision on or off site. The policy should also identify the role of the Development Framework in confirming the location of new schools within the SEWUE.	The Urban Extension will be required to deliver two new 2-form entry on-site primary school provision and either on or off-sites, capable of expansion to 3 forms of entry and a new secondary school providing a minimum of 4 forms of entry provision, based on up-to-date evidence of need and at a scale commensurate with the proposed development.	Main
MD2 clause 14. NOTE: The highlighted changes included in the last sentence of this proposed modification are different to those included in the Regulation 19	The policy should refer to the need to accommodate on site primary school provision commensurate with the impact of new development, and the need to provide secondary school provision on or off site. The policy should also identify the role of the Development Framework in confirming the location of new schools within the SEWUE.	The new secondary school should be located centrally within the overall allocation site, whilst t The new primary schools provision should be located to ensure all homes are within easy walking distance of a primary school, taking into account the location of existing primary schools in the area. The precise location of any new school provision on-site will be determined as part of the Development Framework and future planning applications.	Main

WUPSVLP Policy / Paragraph	Summary of issue(s)	Proposed Modification to MD2	Minor or Main Modification?
Submitted Representations.			
MD2 clause 15. NOTE: This modification was not included in the Regulation 19 Submitted Representations and is therefore a new suggested modification.	Homes England will provide land for a new health centre at Appleton Cross, which can be expanded to cater to the needs of the SEWUE. Additional health provision may be provided within a new leisure centre, if there is opportunity to do so.	The Urban Extension will be required to deliver a new leisure facility including flexible space for health care where there is opportunity and a requirement to do so . The Council will support the co-location of this facility with the new secondary school.	Main
MD2 clause 16.	The policy content with regard to local centres and retail floorspace requirements arising from the SEWUE needs to be amended to be consistent with national policy and other parts of the Plan.	The Urban Extension should also include local shops, a supermarket, and other appropriate local services. and community facilities. Any proposal for retail development above 2,500 sq.m. will require a retail needs assessment and be subject to the sequential assessment set out in Policy DEV5.	Minor
MD2 clause 23.	The approach to BNG should include the requirement for an overarching BNG strategy which informs and aligns with the Development Framework, and which each planning application or phase of development must comply with.	A comprehensive ecological enhancement strategy will be required to support the Urban Extension. This will demonstrate how A scheme for measurable biodiversity net gain will be achieved across the Urban Extension applying the should be demonstrated through the use of the Defra Metric. and provided for all development parcels that come forward for planning approval Each phase of development will need to have regard to this strategy and demonstrate how it is delivering enhancements. Mitigation measures for loss of habitat will only be allowed if shown to be necessary by application of the mitigation hierarchy in accordance with the requirements of Policy DC4.	Minor

WUPSVLP Policy / Paragraph	Summary of issue(s)	Proposed Modification to MD2	Minor or Main Modification?
MD2 clause 24.	The description of the Green Belt boundary does not need to appear in policy wording and that a cross reference to the Policies Map will suffice.	The Green Belt boundary is defined by Stretton Road and the M56 to the south and Broad Lane, the southern edge of Grappenhall Heys and then broadly following Lumb Brook Road and Green Lane to the east on the Policies Map. Where this boundary consists of field boundaries, these will need to be strengthened to create a new recognisable and permanent Green Belt boundary. The need for such measures and the design response will be considered as part of the Development Framework.	Minor
MD2 clause 26.	The policy content with regard to Green Belt compensatory measures should be clarified to include that the Development Framework will identify these, and that financial contributions will be considered towards other off site measures.	A scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt will be required. The improvements should be made in the immediate vicinity of the Urban Extension where possible and will be identified through preparation of the Development Framework. Financial contributions will be considered towards other off-site measures where this would help ensure that the benefits of compensatory improvements can be maximised by providing them in the most appropriate location.	Minor
MD2 clause 27.	The role of the Transport Assessment is embedded in the policy and that its role in identifying and agreeing network improvements should be acknowledged.	A comprehensive package of transport improvements will be required to support the Urban Extension. The details of these and any other network improvements and how they will be achieved will be set out in the Development Framework with further confirmation of their need and details of their delivery in an appropriate Transport Assessment. Required improvements will They include:	Minor
MD2 clause 27b.	Policy elements requiring walking and cycling connections to the South East Warrington Employment Area, and public transport enhancements to various destinations, require clarity in	Improved cycling and walking routes well related to the green infrastructure network; connecting the new and existing residential and employment areas and the South East Warrington Employment Area.	Minor

WUPSVLP Policy / Paragraph	Summary of issue(s)	Proposed Modification to MD2	Minor or Main Modification?
	terms of expectations on the SEWUE.		
MD2 clause 27e.	The requirement for the A50 connection needs to be replaced with the connection to the B5356 Grappenhall Lane.	Providing an improved connection from the allocation site to the A50 B5356 Grappenhall Lane.	Minor
MD2 clause 27f.	Evidence and clarity is required around the proportionate contributions to motorway junction improvements and Canal crossing(s) sought in policy, as well as the deliverability of such schemes.	[A proportionate contribution to improvements to increase capacity at Junctions 10 of the M56 and Junction 20 of the M6] ² .	Main
MD2 clause 27h.	Evidence and clarity is required around the proportionate contributions to motorway junction improvements and Canal crossing(s) sought in policy, as well as the deliverability of such schemes.	[A proportionate contribution towards the delivery of a connection across the Bridgewater Canal and/or Ship Canal] ³ .	Main
MD2 clause 27i	The role of the Transport Assessment is embedded in the policy (as per earlier mod)	Other network improvements as identified by an appropriate Transport Assessment.	Minor

² As set out in the main body of HE/MH Regulation 19 Submitted Representation, this element of the policy is yet to be justified and linked to evidence of need for this requirement arising from the proposed SEWUE.

³ As set out in the main body of HE/MH Regulation 19 Submitted Representation, this element of the policy is yet to be justified and linked to evidence of need for this requirement arising from the proposed SEWUE.

WUPSVP Policy / Paragraph	Summary of issue(s)	Proposed Modification to MD2	Minor or Main Modification?
	and that its role in identifying and agreeing network improvements should be acknowledged.	(linked to changes to clause 27 and only needed if these are accepted)	
MD2 clause 30.	An overarching travel plan for the SEWUE, followed by a range of specific travel plans aligned to each phase of development, would be more appropriate than an inflexible requirement for a single area wide travel plan.	The Urban Extension should be supported by an area-wide travel plan, encompassing the overarching needs of all site users. This area-wide travel plan should replace the need for a series of individual travel plans. Each phase of development will bring forward an individual travel plan outlining specific measures related to that phase and which aligns with the guiding principles of the area-wide plan.	Minor
MD2 clause 31.	The requirements of the SEWUE to enhance the Bridgewater Canal are unclear and not yet supported by evidence, and hence should be removed from Policy.	The Urban Extension should contribute to the Council's wider aspiration of enhancing the Bridgewater Canal as a recreational resource and for the Canal's tow path to provide a cycle and pedestrian link across the Borough.	Main
MD2 clause 32.	The drainage requirements for the SEWUE can be dealt with adequately under policy ENV2, which are supported. It is not currently known whether infiltration can be achieved across the SEWUE and hence this should not be a policy requirement.	A site-wide foul and surface water strategy will be required across the Urban Extension as a whole, incorporating appropriate Sustainable Drainage Systems (SUDS) and flood alleviation measures in accordance with the requirements of Policy ENV2. The surface water strategy will be required to improve on greenfield run-off rates. Development proposals will be expected to incorporate infiltration SuDS and SuDS with multi-functional benefits in preference to traditional underground storage systems.	Minor
MD2 clause 34.	Homes England and Miller Homes consider that the drainage requirements for the	Improvements to the water supply and sewerage network will be required, ensuring that surface water drainage is not combined with foul discharge. A site wide clean water strategy will also be required.	Minor

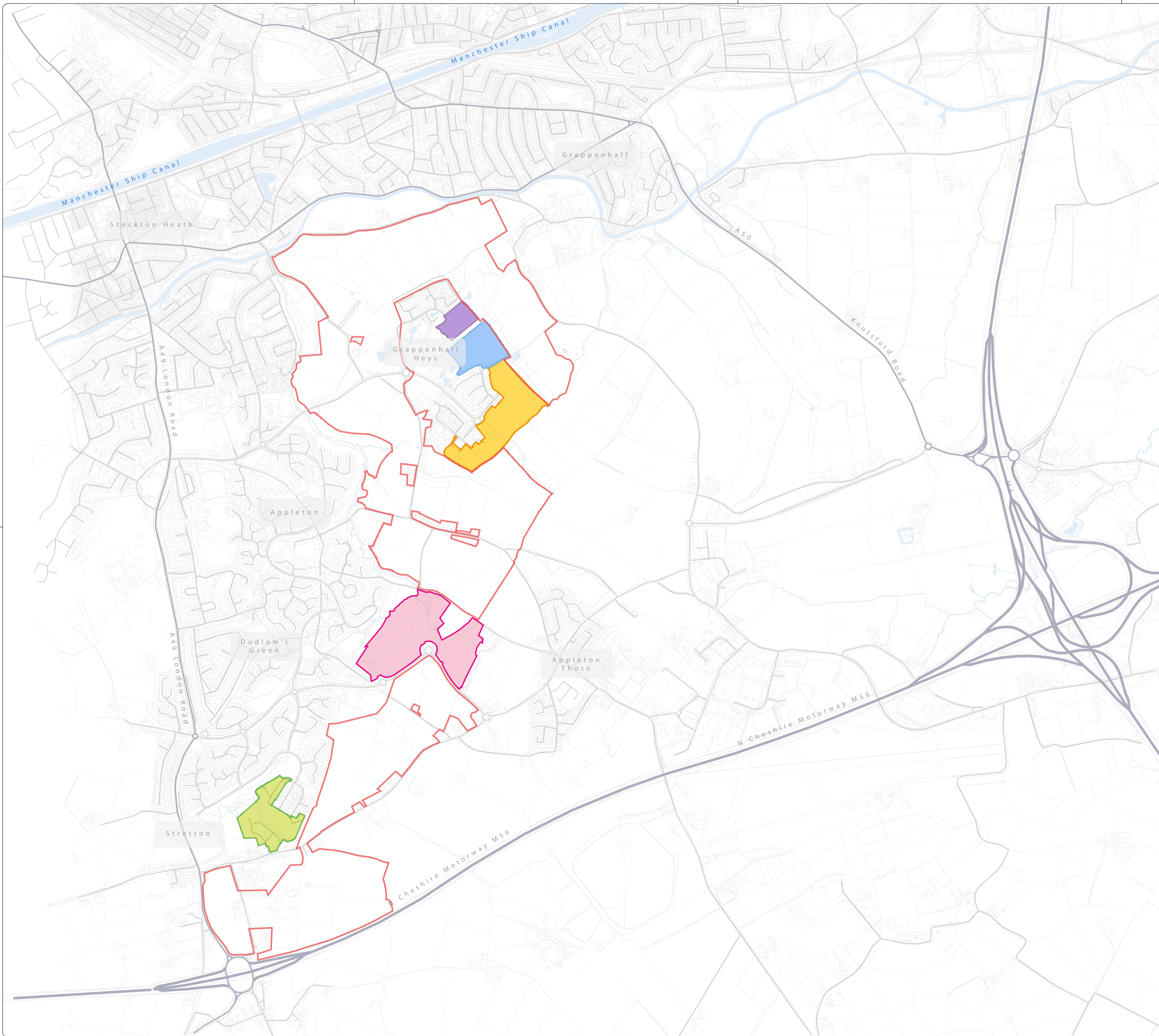
WUPSVLP Policy / Paragraph	Summary of issue(s)	Proposed Modification to MD2	Minor or Main Modification?
	SEWUE can be dealt with adequately under policy ENV2 and INF3/5, which are supported.		
MD2 clause 36.	Clarity is required around the requirement for a new community recycling centre to be located within the SEWUE, including an updated evidence base, otherwise the policy clause should be deleted.	A Community Recycling Centre to serve the Urban Extension and the wider south Warrington area should be provided within the allocation boundary.	Main
MD2 clause 37.	The wording which requires the SEWUE to be as energy efficient as possible is not clear, particularly that requirements are greater than specified under policy ENV7, which is supported.	The Urban Extension should be designed to mitigate the impacts of climate change; be as energy efficient as possible and seek to meet a proportion of its energy needs from renewable or low carbon sources in accordance with Policy ENV7.	Minor
MD2 clause 39.	Policy ENV8 is sufficient to manage the noise and air quality requirements of the SEWUE.	The design and layout of the Urban Extension must incorporate appropriate measures to mitigate any noise and air quality impacts from the M56 and A49.	Main
MD2 clause 41.	The Framework and Policy DC2 provides sufficient guidance on heritage assets and their settings and the policy wording should be amended for consistency The Heritage Impact Assessment	Development within the Urban Extension will be required to sustain, and where possible enhance, the significance of be designed in order to ensure that heritage assets, including any contribution made by and their settings are conserved and, where appropriate, enhanced within the context of the overall development, through appropriate mitigation measures, having regard to the South East Warrington Urban Extension Heritage Impact Assessment.	Minor

WUPSVLP Policy / Paragraph	Summary of issue(s)	Proposed Modification to MD2	Minor or Main Modification?
	reflects a point in time and may require updating.		
Figure 18.	Figure 18 is not consistent with MP1. It should either be replaced with a simple boundary plan that is consistent with MP1 or be removed from the reasoned justification for the policy.	Replace figure 18. with a simple boundary plan that is consistent with MP1 or remove figure 18. completely for the reasoned justification for the policy.	Minor




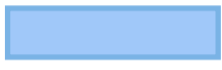


Appendix 3a

Plan Ref: M10372_12 Existing consents not included within the SEWUE (Policy MD2)





- Notes**
1. Drawing to be read in conjunction with all other drawings and specifications forming part of the project package.
 2. Do not scale off this drawing.
 3. This drawing must not be copied in whole or in part without prior written consent of Optimised Environments Ltd.
 4. Ownership boundaries provided by Savills / WSP.
 5. Policy MD2 boundary traced from Council website, available at https://mapping.warrington.gov.uk/wml/Map.aspx?MapName=Planning_and_LLC_External

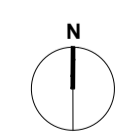
-  Policy MD2 allocation boundary
-  Appleton Cross Reserved Matters Application boundary (Barratt David Wilson Homes)
-  Grappenhall Reserved Matters Application boundary (Urban Splash)
-  Grappenhall Reserved Matters Application boundary (Stewart Milne)
-  Grappenhall remaining Outline Application boundary (Homes England)
-  Pewterspear Green Reserved Matters Application boundary (Barratt David Wilson Homes)



Client
Homes England

Project
South Warrington Urban Extension

Drawing Title
Existing Consents not included within Policy MD2



Scale	1:10000 @ A1	Date	15 July 2022
By	CMC	Status	FOR INFORMATION
Checked	MF	Approved	JF
Dwg no.	M10372_12	Rev	R01

Appendix 3b

Briefing Note - Planning status of Homes
England consented sites and land interests



Appendix 3 - Briefing note summarising status of land owned by Homes England outwith the SEWUE

Introduction

This briefing note has been prepared to support the response of HE and MH to Matter 6b – Main Development Area: South East Warrington Urban Extension.

HE retains an interest in land out with but immediately adjacent to the proposed allocation boundary. This briefing note provides information that determines the ownership and planning status of this land and the delivery status of the planning permissions that have been secured on 3 of the land parcels.

Homes England typically disposes of its land via procurement of a developer from a Framework Panel. A conditional Agreement for Lease is put in place whilst the parties discharge the conditions. A Building Lease is used at the point of contract completion to develop the site according to a defined construction period. Homes England retains the freehold to ensure the developer meets its contractual obligations and the freehold title is transferred directly to plot purchasers or management company at the point of sale / completion of works.

Drawing Ref: M10372_12 identifies the three land parcels at Grappenhall Heys, Appleton Cross and Pewterspear where HE has secured outline planning permission for each site and has Development Contracts in place to deliver each of the three sites.

Grappenhall Phase 1, Appleton and Pewterspear are all under a Building Lease contract with construction underway. Grappenhall Phase 2 is currently under an Agreement for Lease, with the conditions yet to be fully satisfied. The procured developers have secured reserved matters planning permission pursuant to HE's outline permissions on all three sites and have the combined capacity of er c.950 new homes.

Drawing Ref: M10372_14 (Appendix 1 of this Hearing Statement) identifies land that remains fully in the control of HE and has been retained to assist in the delivery of the SEWUE where this is necessary and appropriate.

The remainder of the briefing note presents each of the land parcels in turn.

Pewterspear

HE secured outline planning permission (reference 2016/28807) for up to 180 dwellings on land bounded by Pewterspear Green Road, Ashford Drive, Stretton, Warrington in September 2017.

In October 2018, Barratt Homes (BH) secured reserved matters planning permission (reference 2018/32672) for 180 dwellings and associated development pursuant to the HE outline planning permission.

BH completed the development in September 2021, in a 33-month construction period which equates to an average Build Rate to just over 5 homes per month.

Appleton Cross

HE secured outline planning permission for the following development on land bounded by Green Lane and Dipping Brook Avenue, Appleton, Warrington, WA4 5NN in January 2018 (reference 2017/29930):

“Proposed Residential development comprising up to 370 dwellings, means of access to the site; local neighbourhood centre (including retail convenience store up to 500 square metres; health centre up to 1,000 square metres and place of worship/community use up to 1,000 square metres, with associated outside space, access and parking) recreational open space and related infrastructure.”

In September 2019, Barratt & David Wilson Homes NW (BDWHNW) secured reserved matters planning permission (reference 2019/35105) for the details of appearance, landscaping, layout, and scale further to HE’s outline planning permission.

In the period up to July 2022, BDWHNW has built 162 of the 370 new homes, of which 162 have been sold and/or occupied. BDWHNW are currently in month 20 of a 50-month construction period and on track to achieve an average Build Rate of just over 7 homes per month.

Grappenhall Heys

HE secured outline planning permission (reference 2017/29929) for the following development on land South of Astor Drive, East of Lichfield Avenue, and South of Witherwin Avenue, Grappenhall Heys, Warrington, WA4 3LG in January 2018:

“Proposed residential development comprising up to 400 dwellings, including means of access, recreational open space and related infrastructure.”

In March 2020, Rowland Homes secured reserved matters planning permission for Phase 1a (2019/36202) for 58 dwellings and Phase 1b (2019/36204) for 114 homes approved under HE’s outline planning permission (and as amended). In March 2021 Rowland secured amendments to Phase 1b to deliver 110 homes under reference (2020/38247). Therefore, Phase 1 is expected to deliver 168 homes across the two sub-phases.

In the period up to July 2022, Rowland has built 26 units, of which 22 have been sold and/or occupied. Rowland are currently in month 10 of a 39-month construction period and on track to achieve an average Build Rate of just over 4 homes per month.

In July 2021 Urban Splash House Ltd (USHL) secured reserved matters planning permission (reference 2021/38524) for phase 2 of the development approved under HE’s outline planning permission (and as amended) comprising 228 residential homes, new public realm and landscaping, access, parking, playspace and associated works. Construction has not yet commenced on phase 2 as the conditions within the Agreement for Lease have not yet been fully satisfied.

Additional Homes England Land Landownership

HE also owns additional non-Green Belt and Green Belt land that is not contained within the SEWUE allocation boundary. This are illustrated on **Drawing Ref: M10372_14** (Appendix 1 of this Hearing Statement) and comprise:

Non-Green Belt land

- 1.95ha of land for new local centre at Appleton Cross, including health care provision, which is being provided to address existing needs in the locality, in part arising from HE’s consented sites at Grappenhall Heys, Pewterspear and Appleton Cross;
- 1.83ha land at Dairy Farm, Grappenhall Heys, which is shown within Homes England and Miller proposals as being suitable to accommodate (in part) the larger northern local centre within the SEWUE;

- 2.47ha of land south of Dipping Brook Avenue, including some existing tree groups, which is shown within Homes England and Miller proposals as being suitable to accommodate green infrastructure.

Green Belt land

- 27.64ha within three large parcels immediately on the border of the SEWUE, which have been identified within Homes England and Miller Homes' proposals as being available for SEWUE allocation mitigation, including green infrastructure and outdoor sports improvements;
- 4.49ha of land within two small additional parcels, remote from the SEWUE boundary; one off the A49 at Stretton and one at Appleton Thorn.

Appendix 4

Table - Approach to provision and funding of SEWUE Infrastructure



South East Warrington Urban Extension - Provision and Funding of Infrastructure

Policy Reference	Infrastructure Component	Cost		Mechanism for Delivery	Funding Source	Is the Requirement Clear & Precise?	Homes England / Miller Homes Comments on Infrastructure Component*
		IDP Appendix 1 (IN1)	IDP Appendix 2 (IN1)				
MD2, Para 3(b) and 13	Two 2 form entry primary schools capable of expansion to 3 forms of entry.	£15,500,000	£17,774,400	Developer to provide land - where this is meeting a need which exceeds demand generated by the development, the land value will be offset against S106 contributions. WBC to lead on delivery with its Partners (Education Service / Warrington & Co).	S106 contributions (based upon formula contained within 2017 SPD 'Planning Obligations' or subsequent update) and additional funding from WBC schools programme.	Yes, the policy is precise but the Submitted Representations and HE/MH Hearing Statement challenge the justification for such precision.	Estimated cost in IDP Appendix 2 is based upon a forecast child yield of 0.3 pupils per family home (2 bed dwelling and above) and the latest Department for Education's cost multiplier for primary school places of £12,439 per place. IDP Appendix 1 cost is based on 4,200 total homes, whereas, IDP Appendix 2 appears to be based on a higher number of homes c. 4,762. Homes England and Miller Homes have questioned the precision of the policy wording while additional evidence is collated and the Development Framework progressed. Notwithstanding, land (6.2ha) has been set aside in the SEWUE masterplan in MP1 for primary school provision.
MD2, Para 3(c) and 13	A new secondary school providing a minimum of 4 forms of entry.	£9,000,000	£13,864,200	Developer to provide land - where this is meeting a need which exceeds demand generated by the development, the land value will be offset against S106 contributions. WBC to lead on delivery with its Partners (Education Service / Warrington & Co).	S106 contributions (based upon formula contained within 2017 SPD 'Planning Obligations') and additional funding from WBC schools programme.	Yes, the policy is precise but the Submitted Representations and HE/MH Hearing Statement challenge the justification for such precision.	Estimated cost in IDP Appendix 2 is based upon a forecast child yield of 0.18 pupils per family home (2 bed dwelling and above) and the latest Department for Education's cost multiplier for primary school places of £16,171 per place. IDP Appendix 1 cost is based on 4,200 total homes, whereas, IDP Appendix 2 appears to be based on a higher number of homes c. 4,762. Homes England and Miller Homes have questioned the precision of the policy wording while additional evidence is collated and the Development Framework progressed. Notwithstanding, land (0.98ha) has been set aside in the SEWUE masterplan in MP1 for secondary school provision.
MD2, Para 3(d) and 15	A new leisure facility incorporating health provision.	£20,000,000	£3,282,209	Developer to provide land for built sports provision - where this is meeting a need which exceeds demand generated by the development, the land value will be offset against S106 contributions. WBC to lead on delivery with its Partners (Leisure Service, Warrington & Co).	S106 contributions linked to Sports England calculator and 2017 SPD 'Planning Obligations'.	No. See Submitted Representation and HE/MH Hearing Statement.	Leisure Estimated cost in IDP Appendix 1 assumes delivery of a completely new 'leisure/facilities hub' in South Warrington. However, the Council's evidence base does not define the demand likely to be generated by the MD2 allocation or the extent to which this cannot be met within existing facilities. Therefore, it is unclear how the proposed intervention and suggested Appendix 1 cost of £20m directly relates to the SEWUE. Notwithstanding, land (19.51 ha) has been set aside in the SEWUE masterplan (MP1) for built sports provision (commensurate with a facility of a construction cost of £3,282,209 contained within IDP Appendix 2) and the estimated cost at IDP Appendix 2 has been derived from WBC's Leisure Service using the Sports England calculator and based on the forecast proportionate need for new built sports facilities arising from the development.

Policy Reference	Infrastructure Component	Cost		Mechanism for Delivery	Funding Source	Is the Requirement Clear & Precise?	Homes England / Miller Homes Comments on Infrastructure Component*
		IDP Appendix 1 (IN1)	IDP Appendix 2 (IN1)				
		Reference to 'TBC'.	£3,670,800	<p>NHS will use S106 funding secured via WBC to deliver new healthcare facilities. It is currently anticipated that these will be provided on Homes England land at Appleton Cross. In the event that a separate additional facility is required on land within the SEWUE, this can be colocated with any leisure facility or accommodated on land set aside within one of the proposed local centre within the masterplan.</p> <p>Where such additional land is needed, this will be acquired by the NHS using S106 funds.</p>	<p>S106 contributions (based upon formula contained within 2017 SPD 'Planning Obligations') and additional funding from NHS partners.</p> <p>S106 contributions have already been collected, and continue to be collected, from consented development towards the Appleton Cross health centre.</p>	No. See Submitted Representation and HE/MH Hearing Statement.	<p>Healthcare</p> <p>IDP Appendix 1 identifies a separate requirement for a 'SEWUE - New Health Facility' with the cost and funding mechanism 'TBC'. This is linked back to the 'Leisure' item above.</p> <p>By contrast, IDP Appendix 2 includes a sum of £3.67m towards GPs and Dentists calculated using CCG forecasts of the likely need arising from the SEWUE.</p> <p>The Appendix 2 cost is therefore an estimated S106 contribution to meet the healthcare needs arising from the development, regardless of whether healthcare requirements are in land use terms, addressed on site (through either a combined leisure/healthcare facility) or offsite at Homes England's Appleton Cross development where 1.95 ha is available.</p>
MD2, Para 3(e) and 16	Local shops and other community facilities of an appropriate scale	Ref to 'See above in Sport and Leisure' and £20,000,000 cost	Not included.	<p>As set out above in respect of the leisure/healthcare aspects of the policy, if required, land can be provided within the SEWUE and proportionate S106 contributions made towards the delivery of new leisure and healthcare facilities on and/or offsite.</p> <p>IDP Appendix 2 identifies that Retail and Commercial 'Convenience Retail' is to be provided via Developer Delivery. It refers to the evidence being based on HE/MH Masterplan (MP1), which demonstrates such provision in three separate geographical locations that act as local centres.</p>	S106 contributions (based upon formula contained within 2017 SPD 'Planning Obligations') and additional funding from CCG/NHS England.	No. See Submitted Representation and HE/MH Hearing Statement.	<p>Community Facilities</p> <p>It is assumed that the reference to 'Community Facilities' throughout the policy relates to the suggested 'leisure facilities/hub' which is categorised as a 'Sport and Leisure' and 'Community Facilities' item throughout IDP Appendix 1.</p> <p>Convenience Retail</p> <p>IDP Appendix 2 refers to the provision of Retail and Commercial being based on HE/MH Masterplan (MP1), which demonstrates such provision in three separate geographical locations acting as local centres. These local centres may include other local services as appropriate e.g. vets, post office, etc, which will be determined initially through the Development Framework and market demand.</p>
MD2, Para 3(f) and Para 17	An extensive green infrastructure network	Not included.	Not included.	Developer led	Developer delivery	Yes the policy is appropriately precise for a Local Plan policy.	<p>Whilst not specific costed items contained within the IDP, these aspects of the development will be directly delivered by developers in bringing forward the SEWUE, most likely on a phased basis but pursuant to an overarching GI strategy the principles of which will be included in the Development Framework.</p> <p>The land set aside within the SEWUE masterplan (MP1) is over 77.6 ha, which is far in excess of the Local Plan policy requirements for public open space in support of a residential development of this size.</p>

Policy Reference	Infrastructure Component	Cost		Mechanism for Delivery	Funding Source	Is the Requirement Clear & Precise?	Homes England / Miller Homes Comments on Infrastructure Component*
		IDP Appendix 1 (IN1)	IDP Appendix 2 (IN1)				
MD2, Para 3(g) and Para 18	Playing pitches	£4,093,558	£4,093,558	Developer to provide land for new playing pitches. WBC to lead on delivery with its Partners (Leisure Service).	S106 contributions linked to Sports England calculator and 2017 SPD 'Planning Obligations'.	Yes the policy is appropriately precise for a Local Plan policy.	It is understood that these costs have been generated by WBC based upon the Sport England Calculator. Sufficient land (5.13ha) has been set aside within the HE/MH Masterplan (MP1) to meet the forecast playing pitch requirements of the development, including within remaining Green Belt land within HE's ownership. WBC is supportive of these being co-located with the proposed Secondary School. Further to HE/MH Submitted Representations, and should evidence dictate that a new Secondary School is not required, HE/MH will work with WBC to determine the appropriate location for new playing pitches through the Development Framework.
MD2, Para 3(h) and Para 18	A range of smaller areas of open space within the residential development to serve the new community.	Not included.	Not included.	Developer led	Developer delivery	Yes the policy is appropriately precise for a Local Plan policy.	Sufficient land (77.6 ha) has been set aside within the SEWUE masterplan to provide a range of types and sizes of open space in excess of the Council's public open space standards for a residential development of this size. Whilst not specific costed items contained within the IDP, these aspects of the development will be directly delivered by developers in bringing forward the SEWUE, most likely on a phased basis pursuant to the overarching GI strategy and Open Space Strategy, the principles of which will be included in the Development Framework.
MD2, Para 3(i) and Para 36	A community recycling centre	Reference to 'TBC'.	Not included.	If required, would be WBC led. Land would need to be secured from third party (at cost) to enable onsite delivery.	The WBC 2017 SPD 'Planning Obligations' does not make any provision for securing contributions towards new waste recycling facilities. If such a facility is needed, any contribution would need to meet the requirements of the CIL Regulations.	No. See Submitted Representation and HE/MH Hearing Statement.	For reasons set out in the Submitted Representations, no provision has been made for such a facility in the current HE/MH masterplan (MP1).
MD2, Para 3(j) and Para 27	A comprehensive package of transport improvements, for both on-site and off-site works. Taking key aspects of the policy in turn:						

Policy Reference	Infrastructure Component	Cost		Mechanism for Delivery	Funding Source	Is the Requirement Clear & Precise?	Homes England / Miller Homes Comments on Infrastructure Component*
		IDP Appendix 1 (IN1)	IDP Appendix 2 (IN1)				
	b) Improved cycling and walking routes well related to the green infrastructure network	Referred to as 'Strategic Greenways within South East Warrington Urban Extension' £15,180,723	Referred to as 'On Site Greenways' £15,180,723	Developer led	Developer delivery	Yes the policy is appropriately precise for a Local Plan policy.	These will be developer led delivery items implemented as part of the overall SEWUE development. The indicative costs have been provided by the WBC highways team, based on indicative costs provided by the HE/MHconsultancy teams, albeit with additional optimism bias allowances included.
	c) Providing public transport enhancements to connect the new community	Referred to as "SEWUE - bus service pump priming" and 'Developer Led' £2,200,000	Referred to as 'Pump priming bus services - 5 years' via S106 Contribution £2,200,000	WBC with its Partners.	S106 contributions linked to 2017 SPD 'Planning Obligations'.	Yes the policy is appropriately precise for a Local Plan policy.	The proposed SEWUE will make financial contributions towards the pump priming of bus services (additional frequencies and/or new routes) for a period of five years. The indicative costs are based on this assumption and have been provided to WBC by the HE/MH consultancy teams.
(as above and at MD2 Para 7)	d) Providing additional connections to the A49 to alleviate the A49 London Road/B5356 Stretton Road junction as well as improved junctions on the A49 at Lyons Lane and Longwood Road <i>Note: there is a separate clause at MD2 para 7 also dealing with junction improvements along the A49 corridor.</i>	Includes references to: 'SEWUE - On site strategic highways Interim Cat & Lion Relief Scheme' £11,979,183 'SEWUE - On site strategic highways Stretton East Link Road / Distributor' £7,343,530 'SEWUE - On site strategic highways Completion of the main spine route' £13,442,760 'SEWUE - On site strategic highways Blackcap Road Upgrade' £4,258,685 'SEWUE - Off site strategic highways - Lyon's Lane Junction Improvement' £2,631,250 'SEWUE - Off site strategic highways - Longwood Road Junction Improvement' £1,052,500	As per IDP Appendix 1. All identified as 'Developer Delivery Items'.	Developer led	Developer delivery	Yes the policy is appropriately precise for a Local Plan policy.	These will be developer led delivery items implemented as part of the overall SEWUE development. The indicative costs have been provided by the WBC highways team, based on indicative costs provided by the Homes England and Miller Homes consultancy teams, albeit with additional optimism bias allowances included.

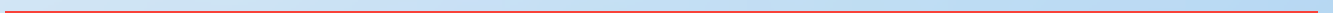
Policy Reference	Infrastructure Component	Cost		Mechanism for Delivery	Funding Source	Is the Requirement Clear & Precise?	Homes England / Miller Homes Comments on Infrastructure Component*
		IDP Appendix 1 (IN1)	IDP Appendix 2 (IN1)				
MD2, Para 3(j) and Para 27	e) Providing an improved connection from the allocation site to the A50	Referred to as 'SEWUE - On site strategic highways - A50 link and Barleycastle Lane' £15,085,936	Referred to as 'A50 link and Barleycastle Lane (33m Corridor)' £15,085,936	Developer led	Developer delivery	No. See Submitted Representations and HE/MH Hearing Statement.	What is included in the IDP, and it is assumed paragraph 27. e. relates to, is a new highway link extending from the centre of the SEWUE site to the B5356 Grappenhall Lane, within land owned by Homes England, which ultimately connects to the A50 further east.
	f) a proportionate contribution to improvements to increase capacity at Junctions 10 of the M56 and Junction 20 of the M6	M56(J10) - £5,000,000 M6(J20) - £18,000,000	M56(J10) - £4,000,000 M6(J20) - £4,000,000	If required in the future, National Highways would deliver with its Partners, using S106 funding secured by WBC from development.	If required, S106 contributions linked to 2017 SPD 'Planning Obligations'.	No. See Submitted Representations and HE/MH Hearing Statement.	For reasons set out in Submitted Representations, this aspect of the policy should be deleted.
	g) On site safeguarding of potential mass transit routes	Referred to as 'SEWUE - On site strategic highways - Transit Enabled Route from Spine Road to Stockton Lane' £16,964,545	Referred to as ' Transit Enabled Route from D to Stockton Lane' £16,964,545	If required in the future, WBC would deliver with its Partners.	If required, S106 contributions linked to 2017 SPD 'Planning Obligations'.	No. See Submitted Representations and HE/MH Hearing Statement.	The expectations of the policy are clearly understood and the HE/MH masterplan (MP1 and Submitted Representations) make provision for sufficient land on key routes to deliver future mass transit in South Warrington. The IDP identifies the provision of the mass transit scheme as the responsibility of developers, however it has previously been agreed with WBC that if required, the SEWUE developers would make a proportionate financial contribution to the delivery of a mass transit scheme, rather than take any delivery responsibility for such works. Flexibility is required to use the safeguarded land for other purposes in the event that mass transit proposals are not brought forward in the future (with agreed timescales for review of the position). Consequently, the requirement for safeguarding of potential mass transit routes and the practical operation of such a policy requirement ought to be determined as part of work to prepare the Development Framework.
	h) A contribution towards the delivery of a connection across the Bridgewater Canal and/or Ship Canal	Referred to as 'Future Bridgewater Canal Crossing'. Cost referred to as 'TBC'. IDP Appendix 1 also includes a cost of £55,000,000 for a high level cantilever bridge crossing replacement at Inner Warrington / South Warrington, albeit this is concept only and that LTP4 recommends study work required.	£10,000,000 via S106 Contribution	If required in the future, WBC would deliver with its Partners.	If required, S106 contributions linked to 2017 SPD 'Planning Obligations'.	No. See Submitted Representations and HE/MH Hearing Statement.	For reasons set out in Regulation 19 submission, this aspect of the policy should be deleted, due to it not being required as a form of mitigation for the SEWUE. Notwithstanding the above, on request of WBC highways team, the HE/MH masterplan (MP1 and Submitted Representations) make provision for sufficient land on key routes to deliver future mass transit in South Warrington, which includes a corridor heading north from the SEWUE (to Homes England ownership boundary) which could link up to any Bridgewater Canal Crossing route delivered beyond the SEWUE.

Policy Reference	Infrastructure Component	Cost		Mechanism for Delivery	Funding Source	Is the Requirement Clear & Precise?	Homes England / Miller Homes Comments on Infrastructure Component*
		IDP Appendix 1 (IN1)	IDP Appendix 2 (IN1)				
	i) Other network improvements as identified by an appropriate Transport Assessment	Not included.	Referred to as 'Off-Site Highways - Local Road Network - Schemes TBC' £1,000,000	If required in the future, WBC would deliver with its Partners.	If required, S106 contributions linked to 2017 SPD 'Planning Obligations'.	Yes the policy is appropriately precise for a Local Plan policy generally, albeit Submitted Representations suggest general amendments the transport elements of the policy.	Absent of a Transport Assessment being undertaken, it is not possible to define a cost attributable to potential further works which may or may not be required.
MD2, Para 30	Area wide travel plan	Not included.	Referred to as 'Residential Travel Plan' £296,800	WBC with its Partners.	S106 contributions linked to 2017 SPD 'Planning Obligations'.	No. See Submitted Representations and HE/MH Hearing Statement which suggest rewording this clause to allow for a phased approach.	Current estimated cost is based upon an implementation fee of £10,600 per 150 homes.

*These comments are made explicitly in relation to the provision and funding of infrastructure identified in IDP Appendix 1 and 2, rather than the wording of relevant policies within the WUPSVLP, which are set out in HE/MH separate Submitted Representations.

Appendix 5

Savills letter to Homes England (15 July 2022)



15 July 2022

Rachel Pitt

BY EMAIL

The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a solid yellow rectangular background.

Adam Mirley

E: [Redacted]

Belvedere

[Redacted]

savills.com

Dear Rachel,

RE: WARRINGTON LOCAL PLAN EXAMINATION – VIABILITY STATEMENT

As per our recent discussions, I write to set out our thoughts on the Inspectors Matters, Issues and Questions (MIQs) document with particular reference to Matter 6b (Question 10) but also covering some more general viability points identified pursuant to Matter 3.

As you are aware, Savills has been advising Homes England (HE) and Miller Homes (MH) on viability matters relating to the South East Warrington Urban Extension (SEWUE). In advance of HE and MH's Local Plan Regulation 19 representations, Savills prepared a development appraisal and cost plan that aligned with the methodology adopted by Cushman and Wakefield (C&W) in the Local Plan Viability Assessment. Since then, Savills has reviewed C&W's Local Plan Viability Report Addendum and the consultation responses detailed in the appendices.

Savills has critiqued the assumptions within the C&W work. There are areas in the assessment where Savills consider the costs to be too high and the values to be too low. It is acknowledged that there is a lot of uncertainty in the current market regarding build cost inflation and value growth. It is also worth stating that the C&W viability work has adopted assumptions at the upper limits of reasonableness within their modelling, particularly in relation to the SEWUE. They have included a full 'on plot' abnormal and infrastructure cost when they have also included the more detailed strategic infrastructure allowance for the SEWUE. We are of the opinion that many of the standard 'on plot' abnormal and infrastructure costs are dealt with in the strategic infrastructure costs and could therefore be lower on the SEWUE.

Savills have undertaken a series of development appraisals to test the sensitivity of the viability of the SEWUE. Savills is content that the conclusions of C&W's report in relation to the SEWUE are reasonable and defensible, and if anything, represent a worst-case scenario and our own analysis supports this conclusion.

From a strategic infrastructure perspective, Savills note that the Council's costs in the Infrastructure Delivery Plan (IDP) (Appendix 2) (Ref: IN1) have significant risk and inflation assumptions applied over and above the original assumptions, which would only ordinarily be applied to highway infrastructure projects and not developer led infrastructure delivery. An example would be that the completion of the "D" in the Council's work costs £13.4m whereas the indicative cost provided by WSP in advising HE and MH was approx. £10.5m. We know this through our dialogue with Warrington Borough Council (WBC) during the development of these costs by WSP. Savills maintain that because all the spine roads within the scheme are going to be delivered by developers rather than as a single highways project, a standard development contingency is appropriate rather than the inclusion of over inflated "Optimism Bias" allowances. Optimism Bias is a term that comes from the Green Book used by Government to appraisal funding applications, it is a calculation of a project's risk. In this



sense the level of risk is akin to that of a highway project where its programme, route and costs are unknown and therefore risk is high. It has been acknowledged that this level of risk is at the upper ends of the acceptable range, and in our view provides an over inflated cost for the strategic infrastructure. Whilst we do not agree with the assumption, it could be viewed positively in that it provides a robust analysis of the plan's viability in a worst-case scenario.

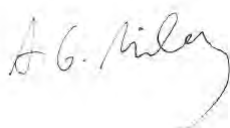
Savills has also always recommended that the costs for the mass transit enabled route should be removed from the list of strategic infrastructure items (as it is currently presented in IDP Appendix 2) and included within the s.106 allowance. Savills have tested the outlined s.106 that Savills believe should be set at £15,000 per plot as at this stage we do not have all the detail as to what will make up this cost due to the lack of available detailed evidence. Savills do however believe that this will be sufficient to cover the SEWUE's impact on all the policy asks within the Local Plan, and if that were to be the actual S.106 cost to mitigate the impact of the SEWUE it will be viable.

HE already has three phases of development on site within non-Green Belt sites at Pewterspear, Appleton Cross and Grappenhall Heys, which have demonstrated strong demand for land within this part of Warrington. Whilst Savills has always had confidence that the trajectory adopted by the Council (that assumes 90 units per annum from 2025/2026 and 180 units per annum thereafter) is reasonable, the recent sales on these sites show sales of between four and six per month with Appleton Cross achieving 13 per month. This gives Savills confidence that its assumption of three sales per month across five outlets is sound and will more than likely be exceeded, potentially with fewer outlets.

Savills remain confident that that the market fundamentals in this part of Warrington are such that developer interest for future phases will be strong. Savills can demonstrate this with evidence of housebuilder interest in a large site it is currently marketing in Warrington.

I trust that this letter is sufficient for your purposes. Should have any queries or require any additional information, please do not hesitate to contact me.

Yours sincerely,



Adam Mirley MRICS
Director



Homes
England

MillerHomes