

**Warrington Local Plan EiP**

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

Hollins Strategic Land

22 July 2022

## 1 Introduction

- 1.1 This hearing statement is made by Hollins Strategic Land (HSL) to the Warrington Local Plan Examination in Public (EiP) and follows previous consultation representations to the local plan process which promoted the Warrington Garden Suburb - WGS). HSL is advocating the reinstatement of the WGS as an omission site along with other developers and landowners who previously formed part of the WGS landowner group (referred as Omission Site Profile: 24) and other landowners who have a vested interest in delivering the WGS.
- 1.2 In summary, HSL do not consider the Local Plan, as submitted, is legally compliant or sound.
- 1.3 HSL consider that the submitted Local Plan is unsound in a number of areas:
- i. The overall housing requirement of 14,688 dwellings over the plan period (2021 to 2038) is too low (816dpa). The circumstances in Warrington provide clear justification for a higher housing requirement than the standard method:
    - a. Most significantly, the housing requirement does not align with projected levels of economic growth.
    - b. The housing requirement should be increased to address affordable housing need.
  - ii. The housing requirement should not be phased to reduce delivery in the early years of the plan period. This would compound the supply of housing needs at a time when they should be met as urgently as possible. Instead of phasing the requirement, the correct approach is to boost supply in the early years of the plan, and this can be done through the reinstatement of the WGS.
  - iii. Insufficient housing land has been identified in the short term, and overall, to meet the identified requirement (let alone a higher figure). There is a significant overreliance on the existing main urban area, existing inset settlements and SHLAA sites, despite such sites failing to deliver and the Council's own evidence demonstrating that significant elements of the SHLAA supply are not viable.
  - iv. The plan proposes no robust flexibility to respond to change, for example non-delivery of allocations such as Fiddler's Ferry or SHLAA sites. In the

absence of such flexibility, there is a real risk that housing need issues will be further exacerbated in Warrington.

- v. The plan proposes too much emphasis on delivering high housing densities:
  - a. At least 130 dwellings per hectare (dph) on sites that are within the defined town centre of Warrington.
  - b. At least 50 dph on sites that are within the wider town centre masterplan area and those sites adjacent to a district centre or in other locations that are well served by frequent bus or train services.
- vi. This reliance on high density development conflicts with the borough wide housing target of 65% of market homes being 3-bed or larger as identified in the Local Housing Needs Assessment (LHNA 2021).
- vii. There is no conceivable way that the identified affordable housing need (433dpa) which equates to 52% of the overall requirement could be met in full, yet the Council has failed to consider whether it would be appropriate to increase the housing target to make further provision for social housing needs.
- viii. The plan fails to provide safeguarded land to meet longer term development needs and to provide permanence to the Green Belt.

#### 1.4 The following key changes are therefore necessary to make the Local Plan sound:

- i. The plan period should be extended to cover at least a 20 year period 2021-2041 and ensure that longer term needs are properly considered over a 30-year period from adoption.
- ii. The housing requirement needs to be increased to at least 943dpa to properly align housing and economic growth and to meet the identified affordable need.
- iii. The supply of housing sites should be boosted significantly and diversified through the allocation of additional deliverable sites.
- iv. Additional Green Belt land release is required.
- v. Safeguarded land should be identified, to meet development needs post 2038.
- vi. Warrington Garden Suburb must be reinstated in full.

## **2 Issue: Whether the South East Warrington Urban Extension Main Development Area (Policy MD2) is justified, effective and consistent with national policy.**

### **Q.1 What is the background to the main development area and how was it identified?**

2.1 We respectfully reserve the right to make comment at the hearing session.

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

2.2 We respectfully reserve the right to make comment at the hearing session.

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

2.3 We respectfully reserve the right to make comment at the hearing session.

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

2.4 We respectfully reserve the right to make comment at the hearing session.

### **Q.5 Are there exceptional circumstances to alter the green belt in this particular case? If so, what are they?**

2.5 There are no exceptional circumstances to release green belt on this scale and as proposed in isolation of other land parcels within southeast Warrington. We would question whether the harm arising from the proposed urban extension at 2,400 homes is actually outweighed by the very little infrastructure benefits arising from the allocation and indeed put forward the argument that the allocation itself is not supported by the evidence base, particularly the SA and LPT4.

- 2.6 There are however exceptional circumstances for a larger Green Belt release at south east Warrington to facilitate the Warrington Garden Suburb on the grounds that it complies with national policy (para 143 NPPF 2021) in that the Garden Suburb boundary would;
- a. Ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development.
  - b. Not include land which is unnecessary to keep permanently open;
  - c. Identify areas where safeguarded land is not allocated for development at the present time (*planning permission for the permanent development of safeguarded land would only be granted following an update to a plan which proposes development*);
  - d. Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
  - e. Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent such as the A50 Knutsford Road to the east, the M56 to the south and the existing urban areas to the west and north within south east Warrington supported offers much more tangible benefits in accordance with the existing evidence base and as such is justified.
- 2.7 We respectfully reserve the right to make comment at the hearing session.

**Q.6 What is the approach towards green belt compensatory improvements? Is this sufficiently clear?**

- 2.8 There does not appear to be a clear strategy for Green Belt compensatory improvements.
- 2.9 The reinstatement of the Garden Suburb would allow for a clear approach to be taken in delivering compensatory improvements.
- 2.10 We respectfully reserve the right to make comment at the hearing session.

**Q.7 What is the background to the specific policy requirement in policy MD 2.3? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?**

2.11 Policy MD2 is based on the policy framework for the Garden Suburb. It however omits key deliverables such as transport infrastructure improvements such as east / west links, new access routes for the A50, Country Park, schools, district centre and neighbourhood centres and community spaces.

2.12 We respectfully reserve the right to make comment at the hearing session.

**Q.8 Does policy MD2 identify all appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?**

2.13 No. The policy does not reflect the evidence base such as LTP4 policy objectives.

2.14 We respectfully reserve the right to make comment at the hearing session.

**Q.9 Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated?**

2.15 We respectfully reserve the right to make comment at the hearing session.

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

2.16 The Garden Suburb is backed by an experience developer group (Hollins Strategic Land/Hollins Homes, Taylor Wimpey, Lone Star and Bloor Homes) who have all worked collaboratively to deliver a comprehensive development for this part of Warrington and on land directly abutting the allocation. Significant investment has already been made by the developer group supporting the Garden Suburb on infrastructure deliverables,

viability and capacity. Progress only stalled when the Council stalled the submission of the local plan and retracted back on annual housing requirements.

**Q.11 How is it intended to bring the site forward for development? What mechanisms will there be to insure a comprehensive and coordinated approach to development, ensuring that infrastructure requirements are provided?**

2.17 We respectfully reserve the right to make comment at the hearing session.

**Q.12 Are any main modifications necessary for soundness?**

2.18 Having regard to the evidence base and a clear justification for uplifting the housing need figure beyond 816dpa to at least 943dpa, we advocate that the Garden Suburb be fully reinstated in the Local Plan.

2.19 The SA at para 8.2.2 reaffirms the reinstatement of the Garden Suburb as a sustainable option to meet future development needs and delivery key infrastructure benefits.

2.20 We respectfully reserve the right to make comment at the hearing session.

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Director