



Warrington Local Plan Examination in Public Hearing Statement

Matter 13: Other Policies

On behalf of Richborough Estates Limited

In relation to land at Hollins Green (Policy OS3)

Participant ID: 0429

August 2022

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Version 2

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1 INTRODUCTION

- 1.1 Asteer Planning LLP has been instructed by Richborough Estates Limited (“Richborough”) to prepare this Hearing Statement in relation to the Updated Proposed Submission Version Local Plan (“SVLP”) and the Matters, Issues and Questions (“MIQs”) posed by the Inspectors.
- 1.2 Richborough controls the site at Hollins Green (Site / Respondent Number: 0429) which has been promoted through the Local Plan process since 2017. The site is wholly deliverable (being suitable, available and achievable) which is demonstrated in duly made representations in June 2019 and in November 2021 (Rep ID number: 0429).
- 1.3 The site is subject to a draft allocation in the SVLP under Policy OS3 (Land North of A57, Hollins Green). The site is suitable, available and achievable and can deliver residential development within the first five years of the Plan Period. There is a clear case for an amendment to the Green Belt boundary at Hollins Green and the site is a sustainable and logical location for residential development that supports a balanced spatial strategy to meet the wider needs of the Borough.
- 1.4 In relation to Matter 13, the Inspectors have raised the following issue:
- “Whether the Local Plan is justified, effective and consistent with national policy in relation to waste management, flood risk and water management, minerals, energy and environmental and amenity protection.”*
- 1.5 This Statement responds directly to the Inspectors’ MIQs; however, it should be read in parallel with previous representations. Separate statements have been prepared in respect of the following matters and should be read in conjunction with this statement:
- Matter 7c (Hollins Green).
- 1.6 In summary, Richborough considers that Policy ENV7 is not consistent with national planning policy and, in particular, paragraphs 153 and 157 of the Framework which promote layout, building orientation, massing and landscaping to minimise energy consumption.
- 1.7 Policy ENV7 should be modified to remove a blanket requirement for all sites, including Hollins Green (Policy OS3, Point 19), to meet an arbitrary target for renewable and low carbon sources of energy.

2 RENEWABLE & LOW CARBON ENERGY DEVELOPMENT

Q13. What is the basis for the requirements for allocations and other major development proposals to meet 10% of energy needs from renewable and/or other low carbon energy sources or to reduce carbon emissions by at least 10% when measured against Building Regulation (Part L)? How would it be implemented in practice?

Q15. Is the approach to renewable and low carbon infrastructure justified and consistent with national policy?

- 2.1 Richborough consider that Policy ENV7(4) is not consistent with national planning policy and, in particular, paragraphs 153 and 157 of the Framework which promote layout, building orientation, massing and landscaping to minimise energy consumption.
- 2.2 Paragraph 155 of the Framework states that, *"To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development..."*.
- 2.3 There is no clear explanation within the policy or evidence base for the SVLP of what constitutes 'suitable development' for renewable and low carbon energy. Furthermore, there is no clause in ENV7(4) whereby new development should comply with the policy unless it can be demonstrated by the applicant that this is not feasible or viable, as detailed in Paragraph 157 of the Framework.
- 2.4 Policy ENV7(5) refers to a requirement for all strategic housing and employment allocations to maximise opportunities for the use of decentralised energy systems by making provision to enable future connectivity in terms of site layout, heating design and site wide infrastructure design, ensuring that at least 10% of their energy needs can be met from renewable or other low carbon energy and to reduce carbon emissions by 10% over Part L.
- 2.5 Richborough objects to this part of ENV7 because it is unlikely that any site below circa 800 dwellings would be able to consider a combined heat and power ("CHP") system and therefore such requirements should only be applied to larger strategic sites only.
- 2.6 On this basis, smaller sites in outlying settlements, including land at Hollins Green, should not be considered "strategic housing allocations" that are required to connect to a decentralised energy system and meet 10% of their energy needs renewable or other low carbon energy. Policy ENV7 and Policy OS3 (Point 19) should be amended through Main Modifications to reflect this to make this policy sound.