

Warrington Local Plan Examination

Matters Statements

MATTER 7A – SITE ALLOCATION - CROFT

August 2022



MATTER 7A – SITE ALLOCATION - CROFT

Issue

Whether the site allocation at Croft (Policy OS1) is justified, effective and consistent with national policy.

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

Questions

1. What is the background to the site allocation and how was it identified?

1.1 The assessment for the high level spatial distribution of options is outlined in Section 2 of the Development Options and Site Assessment Technical Report Sept 2021 (O1) and has been fully documented in response to Matter 3.

1.2 The site was submitted as part of the Call for Sites as a site for residential development (SAP2 - Pages 384 to 386) in 2019. Section 3 of the Development Options and Site Assessment Technical Report Sept 2021 (O1) outlines the process for how each settlement site was identified. The site assessment process concluded that:

Overall the site is considered suitable - unlikely to have a major impact on trends. There are suitability issues surrounding proximity to AQMAs and train stations however the site has good accessibility to primary and secondary schools, formal play space and bus services. The site is achievable as it is in an area of moderate viability and there are no known abnormal development costs. The site is considered to be available as it is being promoted by the owner albeit part of the site is in active use. The site is adjacent to the settlement of Croft being located to the east of Deacons Close and Croft Primary School. The site is considered to be in a sustainable location and is free from ownership issues. There are no known abnormal development costs and the site is in a location of moderate viability. The Council's highways officer considers that an appropriate access can be provided. As such, the site would be in accordance with the objectives set out in the draft Warrington Local Plan including objective W1 to strengthen existing neighbourhoods, W2 to facilitate the sensitive release of Green Belt, W4 to promote sustainable modes of transport, and W6 to minimise the impact of development on the environment.

2. 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?

2.1 The site was assessed in the Green Belt Site Selection – Implications for Green Belt Release - August 2021 Report (GB3) as having a weak contribution to Green Belt purposes.

2.2 The assessment concluded that development of the site would not represent encroachment into the countryside as the majority of the site is currently in use as Heathcroft Stud (equestrian use) therefore the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Croft. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries.

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

3.1 The Green Belt Site Selection – Implications for Green Belt Release - August 2021 Report (GB3) concluded that the site currently makes a weak contribution to Green Belt purposes. Overall, development of the site would not represent encroachment into the countryside as the majority of the site is currently in use as Heathcroft Stud (equestrian use) therefore the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Croft. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries.

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

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

4.1 This allocation site will increase housing choice, provide affordable housing and support the vitality and viability of local services in Croft. The green field and relatively unconstrained nature of the land will enable the site to be delivered in the early period of the Plan meeting identified housing needs in the shorter term.

4.2 This allocation also forms part of a wider spatial strategy that will ensure that sufficient land is provided to meet Warrington's development needs, that housing affordability is addressed and new sustainable communities are created, in a manner that will support the delivery of strategic infrastructure that will also unlock major brownfield development sites.

4.3 These are considered to constitute 'Exceptional Circumstances'.

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

5.1 The Council considers that the scale of housing growth is consistent with the Plan's Spatial Strategy of 'incremental growth' in each of the outlying settlements. The outlying settlements were reconsidered in the Development Options Report 2021 (O1) with consideration given to suitability, and achievability of the sites development. The broader sustainability factors as set out in the Council's Sustainability Appraisal SA Report August 2021(SP3) were also assessed including Green Belt issues, flooding, natural environment and local facilities.

6. What is the background to the specific requirements of Policy OS1? Are they justified and consistent with national policy? Does this provide clear and effective guidance on constraints and suitable mitigation?

6.1 The specific policy requirements either relate to the Local Plan objectives including the type and tenure of homes to be delivered, or to ensure appropriate mitigation in bringing the site forward for development and addressing site constraints. The requirements have been established taking into account the Council's evidence base and site assessment work, engagement with the principal landowner and feedback from previous rounds of consultation. The Council considers the requirements are clear, justified and consistent with national policy.

6.2 The policy provides clear guidance on what the Council expects will be delivered as part of the development including any special considerations concerning Green Belt, climate change and the natural environment.

7. Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?

7.1 The level of development in the outlying settlements, including that proposed in Croft, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements.

7.2 Part 14 of the policy requires a Transport Assessment and associated package of transport improvement measures to support the development. The policy also requires that S106 contributions are made for school places, built leisure facilities/playing pitches and primary care capacity.

8. Is the requirement for Green Belt compensatory improvements justified and appropriate?

8.1 Paragraph 142 of the NPPF requires that where it has been concluded that it is necessary to release Green Belt land for development, local authorities should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

8.2 The Council acknowledges that the approach to Compensatory Green Belt improvements could be clearer in the Policy. As such the Council is proposing a modification to clarify that in the first instance improvements should be made in the immediate vicinity of the site and delivered by the developer. The Council will then consider improvements in the wider area where it can be demonstrated that the improvements cannot be delivered in the immediate vicinity of the site or where this will provide greater benefits. Financial contributions will only be considered where this would help to ensure that the benefits of compensatory improvements can be maximised by providing them in a more appropriate location.

8.3 The proposed wording for the modification is detailed at paragraph 14.1.

9. Is the Council satisfied that safe access to the site can be secured, and that Croft has the appropriate transport infrastructure required to support the development?

9.1 Through the site assessment process, the Council's Highways Officers confirmed that appropriate vehicular and pedestrian access can be provided to the site and that the level of development proposed in Croft can be supported. This is subject to Parts 14 and 15 of the policy which require a Transport Assessment and associated package of transport improvement measures to support the development.

9.2 The Council considers that the level of development proposed in the outlying settlements, including that proposed in Croft, can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements.

10. 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

10.1 **It was raised that the scale of proposed development is not in keeping with the size of Croft.** The Council considers that the allocations proposed in the outlying settlements, including in Croft, are of a relatively limited scale which together with the safeguards in the allocations policies will mean that they will not impact on their respective characters.

10.2 **It was raised that the development does not meet the needs of the area.** The development will provide a range of housing tenures, types and sizes in order to ensure development contributes to meeting the Borough's general and specialist housing needs, including family homes with gardens, specific provision for older people and for younger people looking to purchase their first home. 30% of homes will be affordable.

10.3 **Concern was raised that Croft has always had issues with flooding.** The Updated PSVLP is supported by a Level 1 (E2) & Level 2 (E3) Strategic Flood Risk Assessment (SFRA) taking into account all sources of flooding across the whole of the Borough. The proposed allocation in Croft is within Flood Zone 1 and therefore flooding is not considered to be an issue. Additionally, Parts 16 and 17 of the policy require the site to put in appropriate drainage provision, improve water and sewage networks and ensure that the development mitigates against climate change.

10.4 **There was concern raised regarding disturbance during bird nesting season, the site has buzzards on.** Part 10 of the Policy provides protection for any existing habitats on the site, whilst Part 11 of the Policy requires the development to provide biodiversity net gain.

10.5 **Cheshire Wildlife Trust stated that all areas of priority habitats should be excluded from the allocations in order to avoid harm to biodiversity.** Part 10 of the Policy provides protection for any existing habitats on the site, whilst Part 11 of the Policy requires the development to provide net biodiversity gain.

- 10.6 **Cheshire Constabulary requests the addition of text under community facilities of ‘Appropriate emergency services infrastructure’.** The Council will engage with the Cheshire Constabulary to consider their future needs but there is no evidence to demonstrate that any specific provision needs to be made as part of this allocation.
- 10.7 **It was raised that the development goes against COP 26 and will not address impacts of climate change.** Part 19 of the Policy requires that the development should be designed to mitigate the impacts of climate change: be as energy efficient as possible and meet a proportion of its energy needs from renewable or low carbon sources in accordance with policy ENV7. Additionally, the Council’s Car Parking SPD requires that electric charging points are provided in new developments where viable.
- 10.8 **It has been raised that the proposed allocation site will block views of the Parish Church from Mustard Lane in Croft.** Policy DC6 Quality of Places at point 1 specifies the principles of good design that should be followed this includes a positive contribution to local character and distinctiveness and having regard to street layouts, scale, height and massing.
- 11. Is the development proposed viable and deliverable within the period envisaged, noting that it is anticipated that first homes would be completed in 2024/5?**
- 11.1 The site is in one ownership and it is green field and the relatively unconstrained nature of the land will enable the site to be delivered in the early part of the Plan period. The Local Plan Viability Assessment August (V2) confirms that the site can provide all infrastructure in line with the policy requirements.
- 11.2 The site is in one ownership and optioned to Bellway Homes who have stated that the site can be delivered within the period envisaged.
- 12. What is the situation in relation to land ownership and developer interest?**
- 12.1 The site is in one ownership and optioned to Bellway.
- 13. How is it intended to bring the site forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?**
- 13.1 The policy sets out all the requirements for the comprehensive development of the site. This includes on-site requirements and contributions to offsite infrastructure improvements including community facilities; open space and recreation; transport and accessibility; and utilities
- 13.2 In their written representation UPSVLP 0434 the developer confirms that the site represents a fully deliverable site, capable of being delivered in the first 5 years of the plan period to help meet housing and affordable housing need.
- 14. Are any main modifications necessary for soundness?**

- 14.1 The Council acknowledges that the approach to Compensatory Green Belt improvements could be clearer within the Policy. As such the Council is proposing the following modification:

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

- 14.2 As a result of concerns expressed by Natural England regarding the potential in-combination impact of the Local Plan on Holcroft Moss within the Manchester Mosses Special Area of Conservation, the Council is currently working with Greater Manchester Combined Authority (GMCA) on potential mitigation measures for the moss. The Council is therefore proposing a modification to the Plan, and specifically a modification to Part 18 of Policy OS1, which will require a project level HRA to be undertaken and, if required, provide a financial contribution towards appropriate mitigation measures. The mechanism for establishing any required contribution from individual developments and how this will be used to undertake the mitigation could then be set out in an SPD and therefore an addition to the supporting text will need to be made referring to this.