

Warrington Local Plan 2021-2038: Examination in Public

Hearing Statement by Peel L&P (Holdings) UK
Ltd (representor no. UPSVLP 0426)

Matter 7c: Site Allocation – Hollins
Green

August 2022

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Client

Peel L&P (Holdings) UK Ltd

Our reference

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1. Introduction

- 1.1 This Statement is prepared by Turley on behalf of Peel L&P (Holdings) UK Ltd (hereafter called 'Peel') in respect of the examination of the Warrington Local Plan 2021-2038. It provides Peel's response to the Matters, Issues and Questions ('MIQs')¹ identified by the Inspectors in respect of Matter 7c: Site Allocation – Hollins Green.
- 1.2 The context to Peel's representations, including its development interests in the Borough, is set out in its Matter 1 statement.
- 1.3 This Statement should be read alongside Peel's statements in relation to Matters 1, 3, 4, 6a, b and c, 7a, b and d, 8, 11 and 14. It should also be read alongside statements submitted jointly on behalf of Peel L&P (Holdings) Ltd and Peel Ports (representor number UPSVLP 0438) which relate specifically to Peel's land interest at Port Warrington and Warrington Waterfront.
- 1.4 This Statement focusses on the proposed allocation in the Outlying Settlement of Hollins Green.
- 1.5 Peel is promoting a site in Hollins Green ('Land at Manchester Road') for residential purposes and has made submissions seeking its allocation at previous stages of the Local Plan. It is capable of accommodating around 90 homes during the plan period, with the remainder of the site being designated as safeguarded land for development needs beyond. Peel's representations to the Updated Proposed Submission Version Local Plan ('UPSVLP') demonstrate that the site is capable of accommodating a sustainable residential development and that it performs better than the proposed allocation when assessed against the criteria used by Warrington Borough Council ('WBC') to assess potential allocations and is therefore a more appropriate and sustainable allocation than the Council's proposed allocation.
- 1.6 A Development Prospectus for Peel's site at Manchester Road and an associated technical and environmental evidence base formed part of Peel's representations to the UPSVLP² which demonstrate that the site is developable and can be delivered in an acceptable manner over the plan period or beyond.

¹ ID02

² UPSVLP-0426-P10

2. Matter 7c: Site Allocation – Hollins Green

Q1: What is the background to the site allocation and how was it identified?

- 2.1 Potential development sites have been considered through the evidence base, with OS3 assessed through the Site Assessment Proformas report November 2018, undertaken to inform the Proposed Submission Version Local Plan in 2019 (SHLAA / Site Assessment ref. R18/P2/151).
- 2.2 The assessment includes the scoring of the potential sites against numerous criteria. Peel's representations to the UPSVLP demonstrated that the scoring of its site³ (Site ref. R18/P2/096B) understated numerous beneficial aspects and overstated the extent of constraints. Appendix 7 of Paper 4 submitted as part of Peel's representations⁴ presented a revised assessment and compares it to OS3. It demonstrates that if the performance against a number of criteria is reassessed reflecting up to date information / evidence and a more objective assessment approach, Peel's site performs better in relation to a number of assessment criteria and therefore better overall.
- 2.3 In addition, it makes provision for safeguarded land for future development needs beyond the plan period. This was not considered as part of the site assessment process. The proposed allocation does not make such provision and therefore is fundamentally deficient to Peel's site in terms of its ability to contribute to future development needs, having regard to the need to define Green Belt boundaries that will endure beyond the plan period. This matter is considered further below.

Q2: 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?

- 2.4 The proposed site forms c.50% of a larger Green Belt Parcel (HG6) defined through the Green Belt Assessment ('GBA'). It is identified as making an overall strong contribution to the Green Belt through the 2016 Green Belt Assessment. The proposed allocation comprises the eastern part of Parcel H6.
- 2.5 The Council's Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) (2017) however considers that the site makes a moderate overall contribution to the Green Belt. Peel does not agree that the proposed allocated site makes only a moderate contribution to the Green Belt. The site's southern boundary comprises a watercourse (Marsh Brook) whilst its western boundary is formed by field boundaries and a small residential development (washed over by the Green Belt). These are evidently non-durable boundaries in accordance with Council's own criteria as set out in the 2016 Green Belt Assessment.

³ Contained within the Site Assessment Proformas report November 2018 and updated in the Additional Site Assessment Proformas September 2021

⁴ UPSVLP-426-P4

- 2.6 As set out below, Peel considers that the impact the Green Belt is understated and that the overall conclusion is not justified or supported by evidence. Peel considers that the site makes a strong contribution to the Green Belt.

Q3: What would be the effect of developing the site on the purposes of the Green Belt?

- 2.7 As nearly half of a parcel which the GBA concludes to make a strong contribution to the Green Belt, and as a site which Peel considers to make a strong contribution, development of the site has the potential to cause substantial harm to the Green Belt and have a greater impact than other potential sites, notably Peel's site at Manchester Road.
- 2.8 OS3 also has outer boundaries formed by non-durable features (a watercourse – Marsh Brook – to the south and field boundaries to the west). These boundaries are not considered to be sufficiently strong or enduring to meet the requirement of the NPPF⁵ that new Green Belt boundaries should be capable of enduring beyond the plan period and will lead to the increased potential for further encroachment into the Green Belt.
- 2.9 In light of the conclusions on the contribution of the Parcel and the weakness of the proposed boundaries, it is considered that the release of this site will result in substantial harm to the Green Belt. It also introduces a significant risk of the outward spread of development into the wider parcel (one which itself makes a 'strong' Green Belt contribution).
- 2.10 In contrast, Peel is promoting a site which makes a weak Green Belt contribution and is capable of accommodating a sustainable residential development of c. 90 dwellings during the plan period. Strong, durable boundaries define the outer extent of the site, offering the potential to provide an area of safeguarded land for development beyond the plan period.

Q4: Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?

- 2.11 Peel supports the Council's position that exceptional circumstances exist to justify the release of land from the Green Belt including around the Outlying Settlements.
- 2.12 The Council has demonstrated that this is necessary in order to meet the Borough's housing and employment needs and has sought to maximise the use of land outside the Green Belt as a first priority.
- 2.13 In doing so it has demonstrated that this need cannot be met in full through land outside of the Green Belt.
- 2.14 Exceptional circumstances are therefore considered to exist and warrant a Green Belt boundary review in order that the Borough's full plan period housing and employment needs can be met.

⁵ Paragraph 140

Q5: What is the basis for the scale of development proposed and is this justified?

- 2.15 The UPSVLP proposes to allocate a site (OS3) with a capacity of 90 dwellings. This is reflective of the minimum of 90 homes, as set out in Policy DEV1. It is Peel’s view that this is consistent with the proposed strategy of ‘incremental growth’ within Hollins Green and the other Outlying Settlements of the Borough. An allocation of c.90 dwellings is reflective of the scale of Hollins Green, being a proportionate addition. Hollins Green is also of a sufficient size and scale to offer a range of services and facilities to contribute towards the sustainability of development.
- 2.16 Peel’s position, however, is that Hollins Green’s development requirement would be more sustainably met through the release of land off Manchester Road as proposed by Peel.

Q10: 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

- 2.17 The Site Assessment proforma suggests that access may be provided via Warburton View and/or Orchard Brow Close. However, the plan provided as part of the proforma indicates a gap between the site boundary and the highway edge. If this is not highway land or is not controlled by the promoters of the site, there is no guarantee that access could be provided.
- 2.18 This would necessitate all pedestrian movements to use a narrow stretch of highway footway adjacent on the northern side of Manchester Road. Residential properties abut part of it, prevent widening or improvement. This would significantly limit the pedestrian connectivity of the site and therefore the sustainability.



Q14: Are any main modifications necessary for soundness?

- 2.19 Peel considers that the proposed allocation at Hollins Green is unsound as the approach to selecting it as a potential allocation is unsound as it is:
- not justified by evidence with the Council's assessment underplaying the contribution of the site to the Green Belt and potential access constraints;
 - not positively prepared – failing to capitalise the advantages offered by the site at Manchester Road, in respect of making provision for development needs beyond the plan period; and
 - contrary to national planning policy in respect of ensuring that new Green Belt boundaries endure beyond the plan period.
- 2.20 These issues could be remedied by allocating the land promoted by Peel at Manchester Road.
- 2.21 Peel's Matter 3 statement has also set out the need for the allocation of Safeguarded Land within the Outlying Settlements in order to satisfy paragraph 140 of the NPPF. Peel's land at Manchester Road would be suitable for such an allocation in this context, given the evidence base submitted by Peel which demonstrates that the site is developable in an acceptable and sustainable manner.

Turley Manchester



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