



Warrington Local Plan Examination in Public Hearing Statement

Matter 7c: Hollins Green

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 7c, the Inspectors have raised the following issue:

“Whether the site allocation at Hollins Green (Policy OS3) is justified, effective and consistent with national policy.”

- 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 13 (Other Policies).

- 1.6 Richborough considers the allocation of the site at Hollins Green to be justified, effective and consistent with national policy. In summary, this statement concludes that:

1. The site represents a logical and wholly appropriate extension to the existing urban area of Hollins Green;
2. There are ‘Exceptional Circumstances’ that support an amendment to the Green Belt boundary. In addition to contributing to Warrington’s overall development needs, the site will increase housing choice, provide affordable housing and support the vitality and viability of local services in Hollins Green.

3. The site is self-contained and has strong visual and physical boundaries, with Manchester Road/A57 to the south-east and existing housing to the north-east and north-west. Richborough consider the site makes a “weak” contribution to the Green Belt when assessed against the five purposes that Green Belt serves as set out in the NPPF;
4. Richborough consider that the site can deliver a minimum of 100 homes (at 35dph), which should be reflected in Policy OS3. This is a reflection of the technical work and an Illustrative Masterplan that has been developed for the site and which is attached as **Appendix 1**.
5. Richborough objects to Point 19 of Policy OS3, which requires a proportion of the site’s energy needs to be from renewable or low carbon sources. Our comments on Policy EN7, which is linked to this requirement, are provided in our response to Matter 13 (Other Policies).
6. Richborough has engaged with adjacent landowners and is investigating the potential to deliver Green Belt compensatory enhancements directly adjacent to the site. If this cannot be delivered, Richborough and the Council are also exploring the merits of providing financial contributions to the Rixton Clay Pits SAC, located west of the site, given that this local amenity site (within the Green Belt) is identified in Appendix 1 of the Council’s Infrastructure Delivery Plan (2021) as having a funding gap.
7. Richborough has entered into an agreement with the landowners to promote the site for residential development. Richborough has a proven track record of facilitating the delivery of high-quality housing developments on suitable and sustainable sites and can confirm that the site can be delivered for housing within the early phases of the Local Plan period, including delivery in the first 5 years.
8. The Programme and Housing Trajectory at Tables 6.1 and 6.2 demonstrate how the site could deliver up to 100 units by 2026/2027. This trajectory is realistic based on the delivering an average of 50dpa dpa per sales outlet, and will meet the targets for delivery in the Council’s Housing Trajectory at **Appendix 1** of the SVLP.

2 SITE ALLOCATION: HOLLINS GREEN

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

- 2.1 A Development Statement and detailed representations that demonstrate the suitability of the site for residential development were submitted in June 2019 (Rep ID: 0429).
- 2.2 The Council documents its assessment of high level spatial distribution of options in Section 2 of the Development Options and Site Assessment Technical Report (Sept 2021) (Library Ref: 01) and in its response to Matter 3.
- 2.3 The site assessment process concluded that (Library Ref: 01) the site is sustainably located and suitable for development:

“The site is adjacent to the settlement of Hollins Green and is considered to be in a sustainable location. It is considered to be suitable for development. The site is considered to be available as it is free from ownership issues, having been promoted by the site owner. The site is considered to be achievable as it is in a location of moderate viability and there is developer interest/demand and no known abnormal development costs. Development of 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 land, W4 to promote sustainable modes of transport, and W6 to minimise the impact of development on the environment”.

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 See response to Q3 below.

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

- 2.5 The Council’s Green Belt Assessment (“GBA”) considered the site to have a “moderate” impact on the purposes of the Green Belt, concluding that the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Hollins Green; creating a new recognisable and permanent Green Belt boundary.
- 2.6 Richborough’s own assessment of the site considers the site to have a “weak” contribution to the purposes of the Green Belt, as set out within the Development Statement submitted with Representations to the SVLP in November 2021 (ID: 0429, Appendix 2). The site represents a logical and wholly appropriate extension to the existing

settlement of Hollins Green and is self-contained and has strong physical boundaries, with Manchester Road/A57 to the south-east and existing housing to the north-east and north-west. The western, south-western and south-eastern boundaries of the site, which are heavily vegetated and characterised by highways infrastructure and a watercourse, will be reinforced through a well-designed landscaped scheme that delivers a robust long term and permanent Green Belt boundary.

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

- 2.7 There are clear and evidenced exceptional circumstances that support an amendment to the Green Belt boundaries in Warrington, based on the Borough's overall development needs, a lack of urban capacity and the need for a balanced spatial strategy that meets the identified requirements for market and affordable homes in the Borough.
- 2.8 In addition to positively contributing to Warrington's overall development needs, the site will increase housing choice, provide affordable housing and support the vitality and viability of local services in Hollins Green itself. An amendment to the Green Belt in this location will provide a permanent and defensible boundary that will have a limited impact on the purposes of the Green Belt around Hollins Green.

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

- 2.9 Richborough consider that a "minimum" of 90 homes, as set out in Policy OS3 (approximately 30dph) is wholly achievable on the site. However, Richborough considers that it has demonstrated that a minimum of 100 homes could be delivered (at approximately 35dph), which should be reflected in Policy OS3. Richborough considers this to be a reflection of the technical work and an Illustrative Masterplan that has been developed for the site. A landscape-led Illustrative Masterplan which demonstrates how 100 homes can sensitively be delivered on site is attached as **Appendix 1**.

Q6. What is the background to the specific requirements of Policy OS3? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?

- 2.10 Richborough considers that Policy OS3 broadly provides a justified and consistent approach with National Policy. Richborough's Development Statement (Rep ID: 0429, Appendix 2) provides a detailed assessment of constraints and how an Illustrative Masterplan for the site could provide suitable mitigation that responds to the policy requirements for the site.

2.11 Richborough is committed to meeting the majority of the key objectives for the site which are set out by Policy OS3 but make observations on the detail of the parts of the policy, which are set out as follows:

- **Amount of housing (2)** – As set out in response to Q5 and in **Appendix 1**, the Illustrative Masterplan demonstrates that a housing development of 100 dwellings can be achieved and, as such, Richborough suggest that the policy, whilst stipulated as a minimum, should reflect this.
- **Density (5)** - Richborough has demonstrated that it can construct housing to an average minimum density of 35 per net developable hectare and suggest that the policy reflects this.
- **Green Belt Compensation (13)** – Richborough’s response to the Council’s proposed modifications to Green Belt compensation and Richborough’s approach to Green Belt compensation is provided in the response to Q8.
- **Renewables (19)** - Richborough objects to Point 19 of Policy OS3, which requires a proportion of the site’s energy needs to be from renewable or low carbon sources. Our comments on Policy EN7, which is linked to this requirement, are provided in our response to Matter 13 (Other Policies). Richborough considers that the arbitrary target for renewable and low carbon sources of energy, linked to Policy EN7, should not be adopted and should favour a fabric first approach. At a minimum, there should be a clause to take into account viability and feasibility in accordance with Paragraph 157 of the NPPF contained within Policy OS3. In addition, 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. 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. It should be clear therefore that this should not be a requirement for Hollins Green.

Q7. Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?

- 2.12 The level of development proposed at Hollins Green can be accommodated by existing infrastructure provision, with some limited infrastructure enhancements. As set out in Policy OS3, the site will make contributions to school provision, care capacity and recreation / leisure. Richborough and the Council will engage with relevant providers at the planning application stage to understand the need and the level of contributions required.

Q8. Is the requirement for Green Belt compensatory improvements justified and appropriate?

- 2.13 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.

- 2.14 The Council, in its Hearing Statement to Matter 7c, has proposed the following modification in relation to Green Belt compensatory improvements (Policy OS3, Point 13):

*"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".*

- 2.15 Richborough does not object to this change, as set out in the Council and Richborough's agreed Statement of Common Ground ("SoCG").

- 2.16 Richborough has engaged with adjacent landowners and is investigating the potential to deliver Green Belt compensatory enhancements directly adjacent to the site. If this cannot be delivered, Richborough and the Council are also exploring the merits of providing financial contributions to the Rixton Clay Pits SAC, located west of the site, given that this local amenity site (within the Green Belt) is identified in Appendix 1 of the Council's Infrastructure Delivery Plan (2021) as having a circa £190k funding gap.

Q9. Is the Council satisfied that safe access to the site can be secured, and that Hollins Green has the appropriate transport infrastructure required to support the development?

- 2.17 A single vehicle access point for the development could be taken from Manchester Road/A57. Additional pedestrian and cycle access could also potentially be provided via Warburton View and/or Marsh Brook Close. The proposed access from Manchester Road will take the form of a priority T-junction with ghost-island right-turn lane. The Illustrative Masterplan at **Appendix 1** illustrates where the access to the site will be achieved.
- 2.18 Points 14 and 15 of Policy OS3 require a Transport Assessment and associated package of transport improvement measures to support the development. The above access arrangements will be worked up in detail, alongside a full Transport Assessment, as the planning application for the site is prepared.

Q10. Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated?

- 2.19 Based on the extensive technical assessment work undertaken, and the Illustrative Masterplan for the site, there are no known constraints or adverse impacts that would prevent the site being brought forward for development (as set out in the Development Statement at Appendix 2 Richborough's Regulation 19 representation, Rep ID: 0429).

Q11. 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?

- 2.20 An assessment of the site by a professional team of technical experts demonstrates that the delivery of the entire site is achievable. Richborough has reviewed the economic viability of the scheme in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales and delivery. Richborough can confirm that the development of the site is economically viable and achievable in accordance with the NPPF.
- 2.21 Richborough has extensive experience working with nationally significant development partners. Developer partners who have built out Richborough sites include Bellway, Barratt David Wilson, CALA, Miller, Mulberry, Kier, Lion Court, Taylor Wimpey and Vistry. On Richborough's sites, the average completion rate is a combined rate of 50 dpa per sales outlet for both market and affordable housing provision.
- 2.22 Richborough confirm that the site can deliver residential development within the first 5 years of the Plan Period, based on a Local Plan adoption date of July 2023. Table 6.1 sets

out reasonable assumptions for an indicative programme and the key milestones from EiP through to the occupation of dwellings. Based on Richborough’s experience, this programme is considered to be entirely achievable.

Table 6.1: Hollins Green Indicatives Timescales and Key Milestones

October 2022	Conclusion of Local Plan Examination
January-February 2023	Main Modifications
May 2023	Issue of Inspectors’ Report
February-July 2023	Richborough prepare Outline Planning Application following Main Modifications and issue of Inspectors’ Report (subject to findings). Pre-app with the Council to be undertaken in March 2023.
July 2023	Local Plan adopted (subject to Inspectors Report)
July 2023	Outline Planning Application submitted
October 2023	Application determined
December 2023	Site disposal to developer partner
Dec 2023-Feb 2024	Preparation and submission of reserved matters application
June 2024	Reserved matters application consented and conditions discharged
July 2024	Start on site
Q1 2025	Occupation of first home
Q1 2027	Development complete (based on a development rate of 50dpa for both market and affordable housing).

2.23 The Housing trajectory at Table 6.2 demonstrates how the site could deliver a minimum of 90 units by 2026/2027. This trajectory is realistic based on Richborough delivering an average of 50dpa and will complete the development of Hollins Green in 2026/2027 in line with assumptions in the Council’s Housing Trajectory at Appendix 1 of the SVLP. The site could also deliver 100 units by 2026/2027 based on a rate of delivery of 50dpa, based on Richborough’s Illustrative Masterplan for the site at **Appendix 1** of this statement.

Table 6.2: Hollins Green Housing Trajectory

	Years 1-5						Years 6-10					
Allocation Total	2021 2022	2022 2023	2023 2024	2024 2025	2025 2026	TOTAL (Years 1-5)	2026 2027	2027 2028	2028 2029	2029 2030	2030 2031	TOTAL (Plan Period)
700	-	-	-	10	50	60	30	-	-	-	-	90

Q12. What is the situation in relation to land ownership and developer interest?

- 2.24 Richborough has entered into an agreement with the landowners to promote the site for residential development. Richborough has a proven track record of facilitating the delivery of high-quality housing developments on suitable and sustainable sites and can confirm that the site can be delivered for housing within the early phases of the Local Plan period. Richborough Estates are strong advocates of a plan-led system and are committed to promoting land for residential development by engaging actively with local authorities, parish councils and other neighbourhood forums through local and neighbourhood plans.
- 2.25 As set out in Q11, it is currently intended Richborough would seek to secure outline consent on the site in the first instance, to provide developer certainty, before disposing of the site to a suitable housebuilder partner. Conversely, it may be that the housebuilder partner is selected following the Local Plan's adoption, as opposed to following the outline consent, which would allow a full planning application to be submitted, accelerating the completion of the development.

Q13. 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?

- 2.26 Policy OS3 sets out the requirements for the comprehensive development of the site. This includes on-site requirements and contributions to off-site infrastructure improvements including community facilities; open space and recreation; transport and accessibility; and utilities.

APPENDIX 1: ILLUSTRATIVE MASTERPLAN

Illustrative Masterplan

-  Application site boundary
-  Existing (retained) tree & hedge and root protection area
-  Indicative proposed planting (see landscape plan for details)
-  Existing Public Right of Way
-  Proposed pedestrian/cycle link
-  Potential for equipped play/LEAP

