

Barton Willmore, now Stantec on behalf of Miller Homes (Respondent No. 0435)
Examination into the Warrington Local Plan 2021-2038
Hearing Statement

Matter 7e – Site Allocations - Winwick

Issue - Whether the site allocation at Winwick (Policy OS6) is justified, effective and consistent with national policy.

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

1. No response provided.

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. It is noted that there is a difference between the assessments of the proposed allocation between the October 2016 version of the Green Belt Assessment (Examination Reference GB5) and the September 2021 version (Examination Reference GB4). The difference in assessment is summarised in the table below:

Green Belt Assessment Iteration	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5	Overall Assessment
October 2016 – Site WI7	No contribution	Moderate	Strong	No contribution	Moderate	Moderate
September 2021 – Site R18/040	No contribution	Weak	Strong	No contribution	Moderate	Moderate

Information taken from Table G1 of October 2016 Green Belt Assessment (Examination Reference GB5) and Appendix C of September 2021 Green Belt Site Assessments (Examination Reference GB4)

3. It is accepted that in the intervening 5-year period there could, in theory, be material differences in context that allows a different conclusion to be reached in terms of Purpose 2 - Prevent Neighbouring Towns Merging Into One Another. A potential example of this could be the introduction of development elsewhere which alters the gap between settlements. It is also noted that the parcel sizes differ.
4. However, no intervening development has taken place in the local context and the fact is that the development of the land would move the settlement boundary closer to Newton-le-Willows based on an assessment of either parcel size used.
5. The reasoning set out within Table G1 of the October 2016 iteration (Examination Reference GB5) in relation to WI7 is a more plausible assessment of the site's contribution.
6. It is a fact that the allocation would reduce the actual and perceived gap between settlements. It is not clear, therefore, how the September 2021 version (Examination Reference GB4) can conclude that there is a reduction in the actual gap, but not the perceived gap. The fact is that a reduction in this gap will be perceived as one travels north out of Winwick along Golborne Road or Waterworks Lane, particularly given the open nature of the Site as viewed from these key points.
7. As such, the performance against Purpose 2 should be concluded as **moderate**, not weak as now claimed.
8. The overall assessment of the proposed allocation as performing moderately against the Green Belt Purposes is also inaccurate. This is owing to an inconsistent methodology utilised between assessed sites in Winwick. To demonstrate this point, the assessment of Miller's land at Hollins Lane, Winwick (Omission Site Profile 25 in Examination Reference CD03) is used as a point of comparison.
9. As the Hollins Lane site was not considered as part of the October 2021 assessment, following being assessed as having a strong overall performance in the 2016 iteration, it is not possible to compare their performance directly. However, this has been done in the table below using information from the 2016 and 2021 versions.

Green Belt Assessment Iteration	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5	Overall Assessment
September 2021 – Site R18/040 (Proposed Allocation)	No contribution	Weak	Strong	No contribution	Moderate	Moderate
October 2016 - Site WI3 (Hollins Lane)	No contribution	Weak	Strong	No contribution	Moderate	Strong

Information taken from Table G1 of October 2016 Green Belt Assessment (Examination Reference GB5) and Appendix C of September 2021 Green Belt Site Assessments (Examination Reference GB4)

10. In terms of consistency, it is not clear how the two parcels can perform exactly the same against the purposes, but one have a strong overall assessment and one have a moderate one.
11. As discussed above, the proposed allocation should have been scored as performing **moderately** against purpose 2.
12. In addition to this, the Hollins Lane site should have been assessed as performing **moderately** against purpose 3. This is because as a triangle it has strong boundaries on 2 sides. 1 side is defined primarily by substantial existing boundary planting which could easily be enhanced to create a strong boundary.
13. The assessment of the proposed allocation against purpose 3 as strong is correct as the northern boundary is currently completely open and would require significant enhancement to define. This is discussed further in the response to Q6.
14. As such, the overall assessment of the proposed allocation should have been **strong**, where as the assessment of Hollins Lane should have been **moderate**. Based on this assessment, the proposed allocation should have been discounted from consideration owing to the Green Belt harm, with alternative sites, such as Hollins Lane being considered instead,

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

15. For the reasons set out above in answer to Q2, the site makes a strong contribution to the Green Belt and its development would be more harmful than on land that performed weakly or moderately against the 5 purposes. An example of this is Miller's land at Hollins Lane (Omission Site Profile 25 in Examination Reference CD03).

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

16. Exceptional circumstances exist in general terms because Green Belt release is required to meet the WLP housing requirement in a balanced and deliverable way, including through the release of land at sustainable settlements such as Winwick. This is covered in more detail in our Matter 3 Hearing Statement.
17. In this particular case the Council has chosen to allocate a site where the development would have a more pronounced negative impact on the Green Belt than other alternatives. This weakens the exceptional circumstances case in relation to this site specifically.
18. The allocation of a site that contributed less in terms of the Green Belt purposes, such as Hollins Lane, would certainly meet the exceptional circumstances case.

Q5. What is the basis for the scale of development proposed and is this justified? Could this be readily accommodated, given the sensitive location adjacent to both a registered battlefield, and a service reservoir?

19. Given the constraints identified, including pylons that traverse the land, it is considered that accommodating the stated 130 homes on site will be challenging, thereby calling into question the deliverability of the allocation.
20. A Delivery Statement in relation to the OS6 allocation has been prepared and submitted as part of representations made by Nexus Planning in support of the scheme, dated 15 November 2021. This shows the Site delivering 130 homes. There is also an updated layout included within these representations which shows the site delivering 160 homes. The representation reference is UPSVLP-2297.
21. In both cases it is considered that the layouts are overly optimistic in terms of the quantum of development that can be delivered given the constraints present.
22. In both cases the only meaningful open space provided is located under electricity pylons and no play facilities are provided for children.
23. In addition to this, it is not clear if appropriate set back distances have been provided to the existing electricity lines in accordance with the Design Guidelines for Development Near High Voltage Overhead Lines by National Grid. It is notable that neither the Delivery Statement, nor accompanying representations make reference to the presence of overhead electricity lines on the site nor a pylon to carry them. Indeed, it is stated that there are "no technical constraints to its delivery".
24. This is a significant oversight and raises doubts over the validity of the masterplanning exercise and capacity assumptions made.
25. It is also noted from both layouts provided in the supporting representations that the northern boundary, which should be subject to significant planting to ensure a robust break with the existing Green Belt, appears to consist of only a hedge and sporadic tree planting. This is based on layouts provided in representations made by Nexus (Reference: UPSVLP-2297).
26. For there to be any realistic prospect of a strong Green Belt boundary being achieved a much stronger planting proposal will be required and this will mean that housing will need to be pushed further south, thus limiting the developable area and calling into the question the claimed yield.
27. Miller's land at Hollins Lane (Omission Site Profile 25 in Examination Reference CD03) has far fewer constraints listed within the Council's own evidence. Indeed, detailed analysis of Miller's site produced as part of our Regulation 19 representations shows that it can comfortably deliver circa 100 homes.

Q6. What is the background to the specific requirements of Policy OS6? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?

28. It is considered that requirement 12 will not be sufficient to ensure a strong boundary to the Green Belt to the north. This is because a current physical boundary does not exist and, therefore, new structural planting will require a number of years to be established.
29. This is in contrast to Miller's site at Hollins Lane which already has significant boundary planting separating it from the Green Belt and supplementary planting to reinforce this would therefore be less significant and take less time to establish.
30. The Hollins Lane site would be able to accommodate all of the on and offsite requirements set out in Policy OS6 without constraining delivery of the development.

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

31. No response provided.

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

32. Green Belt compensatory improvements are a requirement of paragraph 142 of the NPPF and therefore the WLP is correct to set this out as a requirement.

Q9. 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.

33. As previously stated, while the presence of electricity pylons and power lines across the proposed allocation has been referenced in the Local Plan Site Allocation Site Profiles document (CD02) as a constraint, no details are given as to how this will be addressed or what the impact will be on capacity, if remaining in situ, or on viability, if diversion is anticipated.
34. Given that alternative sites within Winwick, such as Hollins Lane, do not have such constraints it is suggested that these should be allocated instead in order to remove uncertainty about potential need for mitigation.

Q10. Is the Council satisfied that safe access to the site can be secured?

35. No response provided.

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?

36. No response provided.

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

37. No response provided.

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?

38. No response provided.

Q14. Are any main modifications necessary for soundness?

39. As stated above, the allocation of land to the north of Winwick as OS6 is unsound because it is not justified by the Local Plan evidence base. It performs strongly against the purposes of the Green Belt and therefore exceptional circumstances for its release do not exist, when compared to other available site options that are available locally.

40. However, that is not to say that the need for homes would not represent exceptional circumstances to release land that does not perform as well against the 5 purposes of Green Belt in Winwick. An example of this is Miller's interest at Hollins Lane, Winwick (Omission Site Profile 25 in Examination Reference CD03).

41. In order to ensure that the WLP is sound, land at Hollins Lane, Winwick should replace land to the north of Winwick as allocation OS6.