

# Proposed Submission Version Local Plan

## PART A - About You

1. Please complete the following:

Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.

**Name of person completing the form:** Justin Cove

**Email address:** [REDACTED]

2. What type of respondent are you? Please select one option only.  
If you are an agent please select the type of client you are representing.

A Developer / Landowner

3. Please provide your contact details:

	Contact details
<b>Organisation name (if applicable)</b>	Hive Land & Planning on behalf of Redrow Homes Ltd
<b>Agent name (if applicable)</b>	Justin Cove
<b>Address 1</b>	[REDACTED]
<b>Address 2</b>	[REDACTED]
<b>Postal Town</b>	[REDACTED]
<b>Postcode</b>	[REDACTED]
<b>Telephone number</b>	[REDACTED]

## PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Plan as a whole

2. What does your comment relate to? Please select one option.

Both of the above

**If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).**

See representation attached

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
<b>Legally Compliant</b>		X
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>		X

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

See representation attached

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

See representation attached

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

See representation attached

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

**If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

Due to the complexity of issues being discussed Redrow feel it is necessary to participate fully in the Examination in Public.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each).

If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'.

If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

- File: Warrington Submission version LP - Representations on behalf of Redrow Full Compressed.pdf - [REDACTED]

You have just completed a Representation Form for Plan as a whole.

Please select what you would you like to do now?

Submit response ( I am a Developer / Landowner / Group / Organisation)



# Warrington Updated Proposed Submission Version Local Plan 2021-2038

## Consultation response

Prepared on behalf of Redrow Homes Ltd

### Relevant Sites:

Land West of Culcheth (Call for Sites ref R18/P2/020; Land at Kirknall Farm)

Land at Glazebrook (Call for Sites ref R18/P2/021; Land west of Glazebrook Lane & Bank Street)

Land at Warrington Road, east of Culcheth. (Call for Sites Ref: R19/005;  
Land adj to 363 Warrington Road)

November 2021



## Contents

1.	Introduction.....	4
2.	Vision & Spatial Strategy .....	6
3.	Objectives & Other Policies.....	9
4.	Assessment of Warrington’s Housing land Supply position.....	27
5.	Suggested Site Allocation: Land west of Culcheth, Warrington.....	51
6.	Suggested Site Allocation: Land south of Glazebrook Train Station.....	71
7.	Suggested Site Allocation: Land at Warrington Road, east of Culcheth, Warrington.....	78
8.	Summary and Conclusion.....	81

## Appendices

- A Masterplan and Development Report for Land West of Culcheth
- B Masterplan and Development Report for Land south of Glazebrook Train Station
- C Title Plan for Land at Warrington Road, east of Culcheth

## 1. Introduction

1.1 These representations are submitted on behalf of Redrow Homes Limited (“Redrow”) in relation to the Warrington Updated Proposed Submission Version Local Plan (“WLP”) and supporting evidence base documents published by Warrington Borough Council (“WBC”) in October 2021.

1.2 These representations focus primarily on housing matters across the Warrington Borough, with a more detailed focus on the housing requirement and housing supply position plus specific comments regarding the settlements of Culcheth and Glazebrook, where Redrow have specific land interests.

1.3 Our analysis covers the following matters:

- Consideration of the Vision & Spatial Strategy and whether the WLP as currently drafted will realise these core objectives;
- Consideration of individual policies contained within the WLP as they relate to WLP Objectives W1 to W6;
- An assessment of the various sources of housing land supply set out under Policy DEV1 and MD1 and whether the claimed quantum from these sources can be justified in consideration of past trends, infrastructure requirements, the deliverability of the Town Centre Masterplan and any other known constraints to delivery;
- A review of the delivery and density assumptions applied to the Main Development Areas within the WLP to test whether lead-in times and delivery rates are realistic in line with market and research evidence and any associated infrastructure requirements and conclude whether a shortfall is likely to exist;
- Following the outcome of our assessment of the Housing Strategy, we will determine whether additional sites are required to be identified in order to ensure that housing needs are met in full during the Plan period.

1.4 The following sites are being promoted by Redrow, none of which are currently identified as draft Housing Allocations. Specific details of the sites will be provided in the context of our analysis.

- **Land West of Culcheth** (Call for Sites ref R18/P2/020; Land at Kirknall Farm)
- **Land at Glazebrook** (Call for Sites ref R18/P2/021; Land west of Glazebrook Lane & Bank Street)
- **Land at Warrington Road, east of Culcheth.** (Call for Sites Ref: R19/005; Land adj to 363 Warrington Road)

1.5 It will be confirmed that it is necessary to identify these sites as Housing Allocations within the WLP if housing needs are to be met in full. Further evidence is provided that each of these sites are available, suitable and achievable and therefore capable of being considered deliverable in line with the NPPF definition.



## 2.. Vision & Spatial Strategy

2.1 The Warrington Local Plan (WLP) establishes the vision for the Borough for the following 18 years to 2038 (the end of the Plan period), stating that Warrington will be “a place that works for all”. A detailed vision follows, which includes:

- a. Warrington’s long term growth will be positively planned to ensure new homes, jobs and businesses are supported by major improvements to infrastructure;
- b. Warrington will consolidate its position as one of the most important economic hubs in the UK,
- c. Warrington’s central position within the Northern Powerhouse provides businesses with unrivalled access to the Manchester and Liverpool conurbations, the Manchester Ship Canal and the national road and public transport networks,
- d. New housing development will support Warrington’s economic growth and will be focussed on creating attractive, well designed, sustainable and healthy communities,
- e. The character of Warrington’s places will be maintained and enhanced with a vibrant town centre and main urban area, surrounded by attractive countryside and distinct settlements.

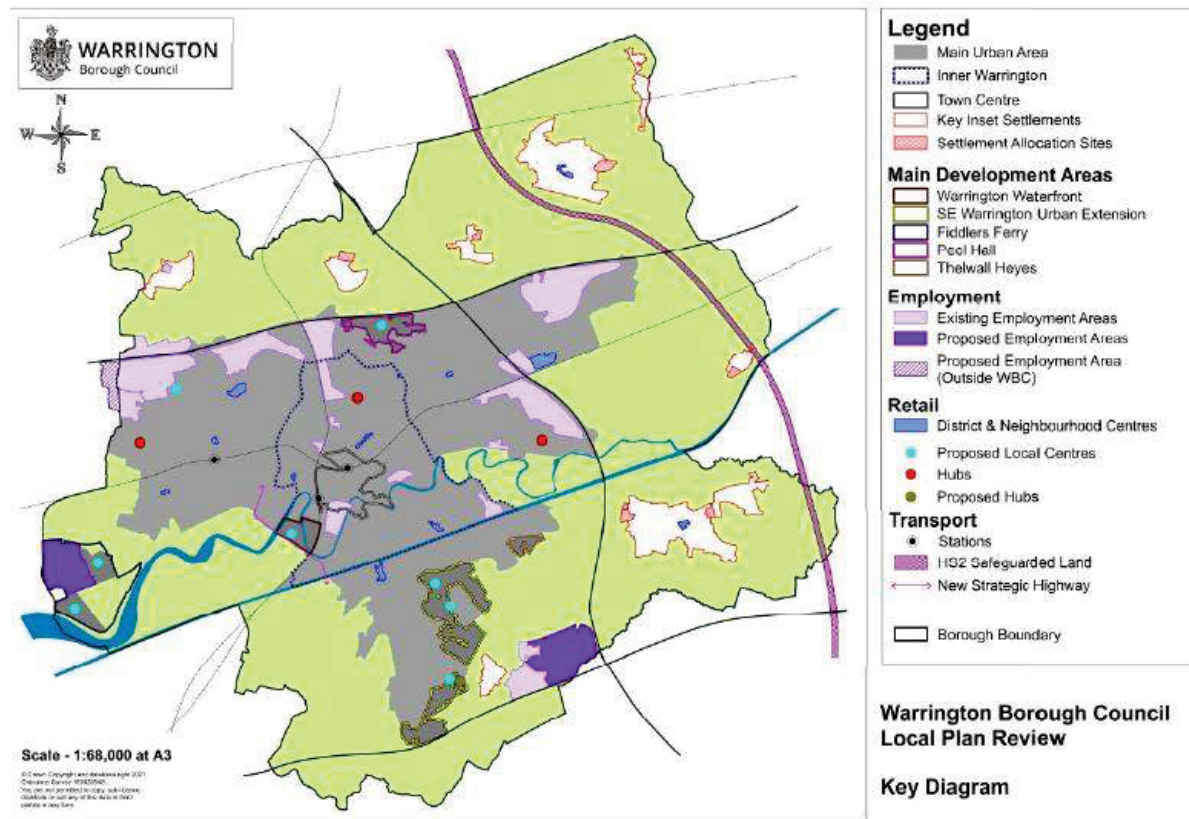
2.2 Redrow fully support the overriding sentiment of the Vision, particularly that new housing development will support Warrington’s ambitious vision for economic growth. However, we do not consider that this sentiment is carried through when seeking to establish the overall housing requirement and spatial strategy.

2.3 A set of six objectives support the Vision, which the Plan states will ensure that the individual elements of the Local Plan are collectively able to deliver the Plan’s overall vision. Section 3 of this representation then sets out Redrow’s views on the policy approach that has been taken to respond to Objectives W1 – W6.

## Spatial Strategy

2.4 The Local Plan Key Diagram provides a visual representation of the Spatial Strategy proposed to be adopted by Warrington, in order to meet the overarching Vision. Figure 1 below provides the Key Diagram.

Figure 1: WLP Key Diagram



2.5 The spatial strategy focuses on maximising the capacity of the existing urban area, which includes intensifying development in the Town Centre, the Inner area of Warrington and opening up the Waterfront as a new urban quarter facilitated by the new Western Link road.

2.6 At a high level, the existing urban area is considered to be able to accommodate around 11,800 new homes, requiring Green Belt land release to accommodate around 4,500 homes in order for the Council to meet its housing requirement. In terms of the Green Belt release, the following spatial strategy is chosen:

- a. An urban extension to the south east of the main urban area, which will deliver around 2,400 homes in the Plan period up to 2038, with a potential for a further 1,800 homes beyond the Plan period;
- b. Development of Fiddlers Ferry opportunity site for 1,300 homes in the Plan period up to 2038, with a potential for a further 1,800 homes beyond the Plan period;
- c. Development at Thelwall Heys of around 310 homes; and
- d. 'Incremental growth' across the outlying settlements of around 800 homes.

2.7 Redrow support the general spatial strategy and agree that exceptional circumstances exist to justify Green Belt release. However, Redrow have some fundamental concerns with regards to how the spatial strategy is proposed to meet the overall housing requirement during the plan period. The primary areas of concern are:

- a. The anticipated yield of housing that is being claimed to be delivered within the existing urban areas (and particularly within Warrington Town centre); and
- b. The assumptions that have been made in respect of the Main Development Areas, in particular whether lead-in times and delivery rates relied upon are overly optimistic when considered against industry research and past trends in Warrington, in addition to the need to deliver major infrastructure items.

2.8 Redrow acknowledge that following the decline of high street shopping, town centres need to regenerate and that introducing new residents to the town centre forms part of this transition. Directing increased levels of housing to the Town Centre, primarily in the form of high density apartments can and should continue to be encouraged, however any proposed increase in delivery rates should be dealt with independently of the housing requirement for Warrington. Serious viability and deliverability concerns exist from this particular source of housing land supply and if Warrington's market and affordable housing needs, both quantitative and qualitative, are to be met in full then an alternative approach is required which directs more growth towards outlying settlements.

2.9 The following Sections now set out our specific concerns in this regard as they relate to the WLP Objectives, along with a consideration of other individual planning policies.

### 3. Objectives & Other Policies

3.1 The following section of the WLP, and therefore this representation, contains policies that correspond to Objectives W1-W6 which accord with the Spatial Strategy, aiming to achieve the “Warrington 2038 and beyond” Vision.

#### Objective 1 – Planning for Warrington’s New Homes

3.2 Objective 1 focuses on the sustainable growth of Warrington and includes the housing requirement and employment land needs, with corresponding policies. Objective 1 is reproduced below:

*‘To enable the sustainable growth of Warrington through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods whilst:*

- *Delivering a minimum of 14,688 new homes (equating to 816 per year) between 2021 and 2038, and*
- *Supporting Warrington’s ongoing economic success by ensuring provision is made to meet the need for 316.26 hectares of employment land between 2021 and 2038.’*

#### *Policy DEV1 – Housing Delivery*

3.3 Policy DEV1 (Housing Delivery) sets out the housing requirement, housing distribution, density, outlines the stepped housing requirement and gives an indication of the future monitoring mechanisms in place.

#### **Housing Requirement**

3.4 The housing requirement for Warrington proposed under Policy DEV1 is a minimum 14,688 new homes, or 816 dwellings per annum. This represents the standard method figure for Warrington based upon the 2014 population projections, with no adjustment proposed. A 10% flexibility factor is then proposed at Table 1 of the WLP (increasing the requirement to 898 dpa).

3.5 Redrow are of the view that this housing figure does not go anywhere near far enough if Warrington are to realise what are rightly ambitious targets around job creation and economic growth in particular. The

2019 Proposed Submission Version had also applied a 4% uplift to account for economic growth aspirations and affordable housing needs and this is an approach that Redrow endorse (albeit a question mark exists in respect of whether 4% is sufficient).

- 3.6 Being located at the junction of the M6 and M62, on the West Coast mainline and surrounded by a critical mass of population within a commutable distance (Greater Manchester, Merseyside, Cheshire and Lancashire), Warrington has a distinct advantage when compared to other locations. This is borne out by the overwhelming success of the regional employment sites at Birchwood and Omega (which is continuing to expand, even into neighbouring St Helens to help meet their neighbouring employment land requirements). Considering the potential that these locations and the new Employment Areas at Fiddler's Ferry (101 hectares) and South East Warrington (137 hectares) bring, it is clear that Warrington is a location that would buck the national and regional trend when it comes to economic growth and the potential for job creation is therefore significant.
- 3.7 The 10% flexibility figure has only been introduced to account for potential shortfalls in the rate of delivery from identified sources of housing land supply and so is not a mechanism that should be used to capture economic growth aspirations. The baseline housing requirement is therefore what needs to be considered within this context.
- 3.8 Following net annual housing completions of 359 (2017-18), 503 (2018-19) and 541 (2019-20) Warrington's 2020 Housing Delivery Test measurement is 57%, meaning that in accordance with paragraph 14 of the NPPF, the presumption at paragraph 11d applies. The Statement of Common Ground accompanying a recent appeal decision on 22<sup>nd</sup> September 2021<sup>1</sup> confirms that at present the Council are only capable of demonstrating a maximum 3.4 years housing land supply. This reaffirms the concerns Redrow have expressed in respect of the claimed Housing Land Supply in Warrington set out in Section 4 of this representation. A flexibility factor of 20% applied to the housing requirement, aligning with the presumption, is therefore considered to be a more appropriate response, resulting in a housing requirement of **at least 979 dwellings per annum**.
- 3.9 The 2021 Local Housing Needs Assessment (LHNA) has also confirmed that affordable housing needs have increased in recent years. The 2021 LHNA has identified an affordable housing need of 433 homes

---

<sup>1</sup> Appeal Ref: APP/M0655/W/21/3271800; New House Farm, Hatton Lane, Hatton, Warrington WA4 4DA

per annum, which has increased significantly in a short space of time with the 2019 LHNA identifying a need of 377 homes per annum; a 15% increase. This will in the most part be due to the historic shortfall in housing completions that has occurred in Warrington. Table 1 below demonstrates that affordable housing completions in Warrington since 2011 have fallen well below (-67%) the current identified need for a prolonged period and this trend will inevitably continue unless an alternative course of action is taken.

Table 1: Affordable Housing completions in Warrington since 2011

2011 /12	2012 /13	2013 /14	2014 /15	2015 /16	2016 /17	2017 /18	2018 /19	2019 /20	Total 2011-20	Average
187	227	202	101	162	72	86	112	131	1,280	142

- 3.10 Redrow consider that the housing requirement has not been uplifted to a significant enough degree to align itself with the economic aspirations that Warrington is seeking to achieve or to meet identified affordable housing needs in full.
- 3.11 It is also considered that an uplift to the standard method of 816 dpa can be justified in accordance with Planning Practice Guidance<sup>2</sup> as ‘strategic infrastructure improvements that are likely to drive an increase in the homes needed locally, in the interests of achieving sustainable development.’ are proposed, such as the Western Link. It has been established that a viability gap exists in respect of the delivery of this road and the homes proposed within the town centre and Inner Warrington are not likely to be able to make the financial contributions necessary to contribute towards its delivery.
- 3.12 An appropriate uplift to the housing requirement, combined with the identification of new housing allocations in sustainable and viable locations considered attractive to the market can therefore be justified. and is in fact necessary to assist in the delivery of strategic infrastructure improvements.

### Housing Density

- 3.13 Redrow are concerned that the combination of the requirement upon Warrington Town Centre sites to achieve a minimum density of 130 dwellings per hectare (dph) and the focus upon the main urban area

<sup>2</sup> Paragraph: 010 Reference ID: 2a-010-20201216

of Warrington in the spatial strategy will create an overreliance on apartments within the housing supply, which ultimately will fail to meet all identified housing needs.

3.14 Indeed, the Local Housing Needs Assessment (LHNA) (GL Hearn, August 2021) stated that Town Centre sites are forecast to generate around 42% of new homes, despite constituting only 12% of sites within the Local Plan supply.

3.15 The LHNA suggests the following mix of housing by size and tenure:

Table 2: Suggested Mix of Housing by Size and Tenure taken from 2021 LHNA

**Table 2: Suggested Mix of Housing by Size and Tenure**

<b>Tenure</b>	<b>1-bedroom</b>	<b>2-bedrooms</b>	<b>3-bedrooms</b>	<b>4+-bedrooms</b>
Market	5%	30%	50%	15%
Affordable home ownership	20%	40%	30%	10%
Affordable housing (rented)	40%	30%	25%	5%

3.16 In addition, the LHNA suggests that it is likely that most 2 bedroom homes should be built as houses (or bungalows) rather than flats. Given the high densities proposed in the town centre area, where the majority of 2-bedroom properties are likely to be located, it seems unlikely that this will be achievable.

3.17 Redrow is therefore concerned that Warrington will not meet its housing requirement by failing to provide sufficient family housing, due to an overreliance on high density development within Warrington Town Centre.

### Stepped Housing Requirement

3.18 Redrow do not consider that Warrington Borough Council will be able to achieve the delivery rates prescribed by the Local Plan, even with the housing requirement stepping up after the first five years (from 678 dwellings per annum to 870 dwellings per annum). Notwithstanding this, Redrow do not support the principle of a stepped housing requirement. The result of such a stepped requirement would enable the Council to reduce the backlog in supply at the start of the plan to achieve a five year housing land supply. This indicates a clear requirement to bring forward more sites in the first five years of the Plan period (greenfield sites outside the town centre that are able to be delivered within the first five years and provide affordable housing and the necessary supporting infrastructure investments).

3.19 The 2020 Housing Delivery Test (HDT) results indicated that over the preceding 3 years, housing delivery rates in Warrington have consistently fallen below the housing requirement, resulting in a HDT score of 57%. The number of homes delivered in Warrington over the last 3 monitoring periods are as follows:

- a. 2017-18: 359
- b. 2018-19: 503
- c. 2019-20: 541

3.20 In addition, as confirmed earlier in this section, Warrington Borough Council accepted that they could only demonstrate a 3.4 years housing land supply in a recent appeal and Table 4 of this representation confirms that average completion rates in Warrington have averaged just 567 dwellings per annum. There is little evidence to suggest that the existing urban area of Warrington will deliver a higher rate of housing completions than historic trends suggest, especially when considering that the new housing at Chapelford Urban Village accounts for a significant proportion of new housing over the last 10 years.

3.21 Warrington Borough Council are currently operating under the presumption in favour of sustainable development, as housing delivery has fallen below 75% of the housing requirement over the last 3 years, with the measurement being 57%. It is therefore evident that more immediately deliverable sites need to be identified for housing outside of the existing urban area if Warrington is to meet its housing requirement during the plan period and it will also help to address the shortfall in five year housing land supply that currently exists.

3.22 Policy DEV1 states at Criterion 8:

*“8. Should monitoring indicate that a 5-year deliverable and / or subsequent developable supply of housing land over the Plan Period can no longer be sustained, the Council will give consideration to a review or partial review of the Local Plan.”*

3.23 The wording of the policy does not provide sufficient commitment that a trigger for bringing forward new sites to take place in the continued absence of a five year housing land supply. The policy wording should be changed from “will give consideration to a review or partial review of the Local Plan”, to “will ~~give consideration to~~ **commit to** a review or partial review of the Local Plan and consider granting planning permission for unallocated sites in sustainable locations.”



3.24 Further changes to the policy are also required so that the WLP can respond quickly to circumstances when there is a shortfall in the five year housing land supply. The policy should be explicit that planning permission will be granted for sustainable development in line with the presumption at paragraph 11 of the NPPF on unallocated sites. The WLP does not identify any safeguarded land (this matter is considered later in this Section) and this could be a circumstance that would allow sites to come forward immediately in a planned and sustainable manner in the event of a five year housing land supply shortfall.

### *Policy DEV2 – Meeting Housing Needs*

#### **Affordable Housing**

3.25 Policy DEV2 requires that affordable housing will be provided on residential developments of 10 dwellings or more, or with a gross floor area greater than 1,000sqm. The policy requires 20% on sites within Inner Warrington (including the Town Centre) and 30% elsewhere in the Borough and greenfield sites irrespective of their location.

3.26 Warrington has underperformed in terms of affordable housing delivery in recent years, with just 112 affordable housing completions reported in 2018/19 and 131 in 2019/20 and as set out earlier there has been an average of 142 affordable housing completions per annum for the period 2011-2020. This is notably lower than the annual affordable housing need identified in the 2021 LHNA (433 affordable homes per annum).

3.27 Redrow considers that it is unlikely 20% affordable housing will be achieved in inner Warrington and Town Centre developments, due to the abnormal costs associated with the delivery of residential development on brownfield sites. When considering Warrington's Housing Land Supply position, Section 4 of this representation has confirmed that planning applications are consistently accompanied with Viability Appraisals within the Town Centre and Inner Warrington, meaning that 20% affordable housing will simply not be delivered in the majority of cases on what is anticipated to account for 42% of future housing land supply. Redrow also have concerns regarding the realism of the quantum of housing that is anticipated to be delivered in the town centre as there is an absence of a strong housing market to make schemes viable on challenging sites and concerns regarding the availability of sites as set out in Section 4 of this representation.

3.28 Part 6 of Policy DEV2 then goes on to states that at least 25% of affordable housing units delivered by developers through planning obligations should be First Homes, and that these First Homes must be discounted by a minimum of 30% against market value and that this will be increased to a 40% discount south of the Manchester Ship Canal having regard to the nationally set cap of £250,000. Redrow do not dispute the need for affordable but it must take into account viability on a case by case basis and provide flexibility to that effect.

3.29 Taking these factors into account, sufficient viable housing sites should be identified and allocated for residential development in the WLP outside of the town centre, if both market and affordable housing needs are to be met in full during the plan period due to the known viability issues of town centre delivery.

### **Housing Type and Tenure**

3.30 Policy DEV2 requires that residential development should provide a mix of different housing sizes and types and should be informed by the Borough-wide housing mix monitoring target provided in WLP 'Table 3: Housing Demand in Warrington'. Table 3: demonstrates that the greatest demand in respect of market housing is for 3-bedroom family housing, accounting for 50% of overall demand. Redrow is concerned that the spatial strategy's focus upon high density Town Centre development will result in a high proportion of apartment developments which will not contribute towards meeting the required mix of family homes that clearly exists in Warrington.

3.31 Notwithstanding this, Redrow do not consider it appropriate to establish a prescribed housing mix at a boroughwide level. The housing mix proposed in respect of individual schemes should take into account the findings of the most up-to-date Local Housing Needs Assessment, the requirements of Registered Providers and viability considerations relevant to the site and location in which the housing is proposed. This will help to ensure that actual housing needs are met on a case by case basis, which will inevitably vary owing to geographic location, market factors and changes in market conditions and housing needs over time.

### Space Standards

- 3.32 Redrow notes that Policy DEV2 states that the Council will seek to provide dwellings that are appropriately sized and arranged to create well designed homes, in accordance with Nationally Described Space Standards (NDSS).
- 3.33 Housing: optional technical standards Planning Practice Guidance (PPG) requires that justification for requiring internal space standards is provided by Local Planning Authorities. Redrow do not consider that Warrington have provided sufficient evidence of clear need to adopt internal space standards, nor has it been demonstrated that the inclusion of the NDSS standard does not affect the viability of development. Furthermore, there is also no 'reasonable transition period' following the Plan to enable developers to factor the cost of space standards into future land acquisitions.
- 3.34 Redrow therefore do not consider that the inclusion of NDSS within the Local Plan is justified or consistent with national policy as the Council have not provided sufficient justification to introduce NDSS based upon the PPG requirements.

### Optional Standards

- 3.35 Policy DEV2 seeks to ensure as a minimum, all homes should meet Building Regulation Standard M4(2) 'Accessible and Adaptable dwellings' and 10% of new housing meets M4(3) 'Wheelchair user dwellings' unless evidence is submitted to demonstrate this is not viable.
- 3.36 Redrow are supportive of providing Homes for All, but do not consider that the Council's Local Housing Needs Assessment provides sufficient evidence or justification, in order to introduce such a policy that includes optional higher standards for accessible and adaptable homes (as required by PPG).

### Housing for Older People

- 3.37 Policy DEV2 also requires residential developments of over 10 dwellings to provide housing for older people. The policy does not outline a precise percentage.
- 3.38 Redrow agree that housing for older people is an important consideration, considering the ageing population. However, Redrow consider that Point 18 of Policy DEV2 is not precise, as it is not clear what

actually will be required from developments over 10 dwellings, other than providing some housing for older people.

#### *Policy DEV5 – Retail and Leisure Needs*

3.39 Redrow supports the allocation of Culcheth Village as a neighbourhood centre and Glazebrook Village as a local centre, in the 'Hierarchy of Centres' in Policy DEV5.

### **Objective 2 – Warrington's Green Belt**

3.40 Objective W2 focuses on Warrington's Green Belt and is reproduced below:

*“Objective W2: To ensure Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term”.*

#### *Policy GB1 – Green Belt*

3.41 The position set out in the WLP is that exceptional circumstances exist to justify the release of Green Belt land in Warrington in order to meet identified housing needs. Redrow support this conclusion.

3.42 However, there are still real doubts over whether the baseline Housing land Supply is going to deliver as expected, and therefore whether this is a robust source on which to base decisions about Green Belt release.

3.43 Notwithstanding Redrow's doubts about whether the quantum of sites within the existing Warrington urban area and town centre in particular will even come forward (see Section 4 of this representation), there seems a real risk that a strategy which relies so heavily on high density urban sites will fail to deliver enough of the type of dwellings required in the types of locations required. Redrow's specific concerns are that the proposed strategy will not deliver sufficient levels of affordable or family housing to cater for the clear unmet need that exists. More sites are required in a variety of locations to provide a degree of choice and to meet market demand. The land being promoted by Redrow in Culcheth and Glazebrook (see Appendices A, B and C) have a particular role to play in providing housing that is more aspirational and is known to meet evidence housing demand in Warrington, as well as the requisite level of affordable housing.

3.44 Overall, the above concerns serve to strengthen Redrow's fundamental view that the WLP should be taking the opportunity to release additional smaller, deliverable sites from the Green Belt in order to ensure an immediate and steady supply of housing land over the plan period, help to re-establish a five year housing land supply and improve the current 57% Housing Delivery Test measurement. Sites that are demonstrably available and achievable can be relied on to deliver homes.

#### **The need to identify safeguarded land**

3.45 Paragraph 143 of the NPPF states that identifying areas of safeguarded land would assist with ensuring that the Green Belt boundaries proposed endure and longer-term development needs are met well beyond the existing plan period. With this in mind, given the significant concerns Redrow has in respect of the existing claimed sources of housing land supply, Redrow are of the view that the identification of additional areas of safeguarded land, combined with a review mechanism, is essential and the failure of the WLP to identify any safeguarded land does not provide any flexibility to meet future development needs, which goes to the heart of the soundness of the Plan.

3.46 A trigger mechanism based upon actual rates of delivery should be incorporated in respect of future Local Plan reviews, which is an approach recommended at paragraph 33 of the NPPF. This would enable safeguarded land to come forward for development earlier in the plan period should the housing trajectory currently anticipated in the WLP fail to deliver the required level of housing. Policy M1 'Local Plan Monitoring and Review' is the mechanism to achieve this and our thoughts on the specific wording of this policy (which needs strengthening) are set out later in this Section.

3.47 Redrow's view is that this should also be taken a step further and suitable sites identified now as suitable 'Plan B' sites should these circumstances arise. This approach was endorsed by the Inspector conducting the Examination into the West Lancashire Local Plan and Policy RS6 sets out the triggers that apply for 'Plan B' sites to be considered, which are related to housing delivery performance considered against the housing target.

3.48 The formal 'trigger' mechanism for a review of Safeguarded Sites and the identification of 'Plan B' sites should therefore be included within the wording of Policy DEV1 (and/or Policy M1) as this would improve the flexibility of the Plan to adapt to rapid changes in circumstance, as set out in the NPPF (Paragraph 11)

and will allow sites to come forward in a more structured and well-planned manner rather than through speculative planning applications and/or Section 78 appeals.

### Objective 3 – Warrington’s Town Centre and Surrounding Area

3.49 Objective W3 is as follows:

*“To strengthen and expand the role of Warrington Town Centre as a regional employment, retail, leisure, cultural and transport hub, whilst transforming the quality of the public realm and making the Town Centre a place where people want to live.”*

#### Policy TC1 – Town Centre and Surrounding Area

3.50 Redrow broadly support the objective to encourage new residential development in the town centre, however there are serious concerns regarding the over-reliance upon town centre sites within the existing Housing Land Supply, as according to the LHNA they account for around 42% of total supply, although it not made explicitly clear within the evidence base exactly which sites make up the supply, nor how they relate to the Town Centre Masterplan.

3.51 Concerns have been expressed elsewhere in this representation regarding this approach and the absence of any compelling evidence to justify the approach being taken. The type of housing needed in Warrington will not be delivered (family housing and affordable housing) and significant concerns exist in respect of viability and the ability for these sites to contribute towards or deliver the key infrastructure needed to support development of this scale.

3.52 The Housing Delivery Test measurement, appeal decisions and continuous absence of a five year housing land supply all described within this representation clearly point towards alternative sources of housing land supply needing to be identified if Warrington’s housing requirement is to be met in full during the plan period.

### Objective 4 – Sustainable Travel and Transport

3.53 Objective W4 is as follows:

*“To provide new infrastructure and services to support Warrington’s growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.”*

#### *Policy INF1 – Sustainable Travel and Transport*

3.54 Redrow agree that new development should be located in areas with easy access to high quality and regular public transport services and in sustainable and accessible locations. As set out in Section 5 of this representation, a greater level of housing growth can be sustained in Culcheth and this approach to housing distribution would adhere to the principles set out under Policy INF1. Likewise, being located immediately adjacent to Glazebrook train station, the land being promoted by Redrow would adhere to these principles, representing sustainable development that promotes the use of public transport.

#### *Policy INF2 – Transport Safeguarding*

3.55 Policy INF2 identifies the proposed route of the Warrington Western Link as safeguarded land as it is considered essential to support the spatial strategy set out within the WLP. Paragraph 3.3.30 of the WLP states that the Western Link will:

*“... directly enable the development of the Waterfront area and through reducing traffic levels on the existing road network, it will facilitate a greater level of development within the Town Centre and across Inner Warrington.”*

3.56 On this basis, a significant quantum of residential development is proposed to come forward within these areas, which has influenced the overall spatial strategy contained within the WLP. Redrow have concerns regarding this approach as the Western Link still needs additional funding to be delivered and once secured, it will take a number of years to be constructed and in turn housing completions will come forward much later in the plan period than currently envisaged.

3.57 When considering the overall spatial strategy in respect of meeting employment land needs, the WLP (at paragraph 3.3.26) has effectively constrained the identification of new employment sites at this stage until such point as key infrastructure, including the Western Link, is delivered:

*“Given these constraints, the Council is not proposing to make any further allocations to come forward later in the Plan Period or to provide safeguarded sites. The Council is however committed to undertaking*

*a review into Warrington's employment land needs before the end of the Plan period to ensure the long term supply of employment land. At this stage, it is likely that key infrastructure improvements, including the Western Link and motorway junction improvements, will have been delivered and the impacts of any further required employment allocations can be fully appraised."*

3.58 A different approach is therefore being adopted in respect of the spatial strategy for residential and employment land needs as the identification of new employment sites is being constrained on the basis that the Western Link will not come forward until later in the plan period, whereas there is no such constraint in respect of housing sites for which this key piece of infrastructure is essential. This is of concern for Redrow, who question whether the spatial strategy can be justified in respect of the over-reliance upon the Town Centre, Inner Warrington and Waterfront areas to fulfil Warrington's housing needs and the timing of delivery of the Western Link.

#### *Policy INF4 – Community Facilities*

3.59 As set out in Section 4 of this representation, a significant quantum of residential development is proposed within the Town Centre and Inner Warrington and there are known viability issues within these areas. The opportunity to secure financial contributions towards the provision of social and community facilities to support this level of new development is therefore limited and so the current spatial strategy will fail to achieve the objectives of Policy INF4.

#### *Policy INF5 – Delivering Infrastructure*

3.60 Policy INF5 states that the following matters are to be funded by planning contributions:

- Affordable housing
- Public realm improvements and creation, including public art.
- Improvements to Heritage Assets.
- Flood defence and alleviation schemes, including SuDS.
- Biodiversity enhancements.
- Open space, including green infrastructure and allotments.
- Transport improvements, including walking and cycling facilities.
- Education provision.



- Utilities.
- Waste management.
- Health infrastructure.
- Sport, leisure, recreational, cultural and other social and community facilities.

3.61 The LHNA confirms that the Town Centre is to account for around 42% of all new homes over the Plan Period and Section 4 of this representation confirms that residential developments within the Town Centre are consistently accompanied with a Viability Appraisal and that a planning contribution towards wider infrastructure provision is not considered to be viable.

3.62 The current WLP spatial strategy in respect of meeting future housing needs is therefore severely constraining the potential for planning contributions to be secured towards the types of infrastructure provision listed above. Sites that are known to be deliverable and viable should represent a much greater proportion of the overall housing land supply for Warrington if the objectives of Policy INF5 are to be fulfilled. This will not only ensure that the impact of new residential developments are appropriately mitigated against, it will also help to contribute towards any infrastructure deficits that currently exist to the benefit of existing communities.

3.63 The sites being promoted by Redrow in Culcheth and Glazebrook (see Appendices A, B and C) are known to be viable and deliverable and so therefore can provide an appropriate planning contribution towards essential infrastructure in line with the principles set out under Policy INF5.

### Objective 5 – Warrington’s Places

3.64 Objective 5 is as follows:

*“To secure high quality design which reinforces the character and local distinctiveness of Warrington’s urban area, its countryside, its unique pattern of waterways and green spaces and its constituent settlements whilst protecting, enhancing and embracing the Borough’s historic, cultural, built and natural assets.”*

### Policy DC1 – Warrington’s Places

3.65 In respect of Inner Warrington, a number of key objectives are set out under Policy DC1 which new developments are required to provide. Two of these policy requirements are:

*“e. Improve the housing offer to provide a range of tenures and types of dwellings in this area;*

*f. Provide sufficient amounts and types of affordable housing in accordance with Policy DEV2 to meet specific local needs;”*

3.66 In respect of criterion (e), Policy DEV1 requires higher minimum densities in centrally located areas, with a minimum of 130 dwellings per hectare in the Town Centre and 50 dwellings per hectare on sites that are within the wider Town Centre Masterplan area. This will result in a far greater proportion of apartments coming forward in such locations, which limits the potential to provide a wide range of tenures and types of dwellings.

3.67 With reference to criterion (f), Policy DEV2 requires 20% affordable housing provision on sites within Inner Warrington, but there are known viability concerns in this area, which could have the effect of limiting the quantum of affordable housing being delivered in Inner Warrington. Affordable housing for families would be further limited because of the combination of viability concerns and the requirement to deliver high density schemes in Inner Warrington in accordance with Policy DEV1.

#### *Policy DC6 – Quality of Place*

3.68 Designing high quality, accessible neighbourhoods that encourage walking, cycling and public transport are at the heart of what Redrow strive to achieve, as well as incorporating best practice principles such as Manual for Streets wherever possible and so the principles of Policy DC6 are supported.

3.69 To demonstrate this, Redrow have prepared an innovative placemaking framework which establishes eight design principles (the ‘Redrow 8’) to define how Redrow achieve high quality design within all their developments.

1. **Listen and learn:** Connecting with local communities and stakeholders at an early stage to identify local concerns that may inform the development proposals.
2. **Keeping it local:** Working to value and design around what is important locally, dovetailing developments to sensitively fit into the area.

3. **Easy to get around:** Creating new or improved connections between developments and the existing community by stitching streets and routes into the neighbourhood.
4. **Places to go and things to do:** Creating locally tailored, interconnected community infrastructure, providing opportunities for people to interact and socialise.
5. **Nature for people:** Creating new or enhancing existing wildlife habitats and better connecting people to them through thoughtful design of public spaces.
6. **Streets for life:** Recognising the street as an essential part of creating safe, attractive and friendly places to live, where neighbours can meet each other.
7. **Homes for all:** Sustainably and socially cohesive communities are formed where there is a diverse mix of housing types and tenures.
8. **Built to impress:** First impressions count; creating inviting, memorable entrances and building beautiful, distinctive homes.

3.70 These core principles are ably demonstrated through the intended approach that is to be taken in respect of the three sites in Culcheth and Glazebrook being promoted by Redrow as part of this consultation response. More details relating to the approach that is to be taken can be found in the Masterplan and Development Reports at Appendices A and B.

### Objective 6 – Waste Management in Warrington

3.71 Objective 6 is as follows:

*“To minimise the impact of development on the environment through the prudent use of resources and ensuring development contributes to reducing carbon emissions, is energy efficient, safe and resilient to climate change and makes a positive contribution to improving Warrington’s air quality.”*

### Policy ENV7 – Renewable and Low Carbon Energy Development

3.72 Redrow welcome the acknowledgement that carbon reduction targets in the short term should align with an achievable betterment (10%) against the Building Regulation (Part L) in respect of carbon reduction as this is a standard that the housing industry are currently striving to achieve. There are however other initiatives emerging such as the Future Homes Standard, which is a transition that Redrow and the rest of the housebuilding industry are also familiar with.

3.73 Redrow are of the view that reference to meeting the Future Homes Standard could also be included within the policy wording in order to take into account wider industry standards. This allows for any further changes to Building Regulation (Part L) to be accounted for because as currently worded, the 2013 regulations which are currently in force are not explicitly referred to. It could therefore be the case that future changes to Building Regulation (Part L) aligns itself with the Future Homes Standard, at which point a 10% carbon emissions reduction against Part L could be considered onerous.

## Monitoring Framework

### *Policy M1 – Local Plan Monitoring and Review*

3.74 This policy sets out the approach that is to be taken to monitor the performance of the WLP once adopted. Redrow support the recognition of the importance that monitoring has and that it is essential to ensure that sufficient housing sites are identified to meet Warrington's housing requirement on a rolling basis. Redrow do however have some concerns in respect of some elements of the policy wording.

3.75 Given the concerns expressed earlier in this section regarding the impact that higher density development will have on delivering the known demand that exists for family housing in Warrington, Redrow strongly object to Criterion 2c, which intends considering increasing density on allocated sites in order to increase the delivery of housing and affordable housing. Increasing density does also not necessarily make developments more viable.

3.76 As per our earlier comments in respect of Policy DEV1, Criteria 3 and 4 of Policy M1 need to be more committal in respect of the need to undertake a review or partial review of the Local Plan should there be an identified shortfall in housing land supply. The identification of safeguarded land and the ability for unallocated sites to come forward in line with the presumption at paragraph 11 of the NPPF should also be incorporated to allow for Redrow consider that the wording of these criteria should be changed as follows:

“3. Where total delivery of housing is less than 75% of the annual requirement for three consecutive monitoring years, this will trigger the need for unallocated sites to come forward for development in line with the presumption in favour of sustainable development and the consideration of a review or partial review of the Local Plan.

4. Where there is an identified risk to delivery of infrastructure essential to delivering the Spatial Strategy of the Plan that prevents homes coming forward in the manner envisaged, this will trigger the need for unallocated sites to come forward for development in line with the presumption in favour of sustainable development and ~~the consideration of~~ a review or partial review of the Local Plan.”

3.77 The continued absence of a five year housing land supply would represent a fundamental failing of the WLP to plan proactively for Warrington’s future housing needs. Paragraph 33 of the NPPF requires policies to be reviewed to assess whether they need updating no later than five years from the adoption date of a plan, irrespective of any monitoring activity. The criterion set out under Policy M1 therefore need to provide sufficient clarity and commitment to proactively address a shortfall in housing land supply as soon as it occurs.

## 4. Assessment of Warrington’s Housing land Supply position

- 4.1 Table 1 of the Warrington Submission Version Local Plan (WLP) establishes the land requirements to meet the overall housing requirement of 16,157 over the 18 year plan period 2021 to 2038. The current Urban Capacity is considered to be 11,785 dwellings, which then leaves a requirement to release land from the Green Belt to accommodate a further 4,372 dwellings.
- 4.2 This Section goes on to consider the claimed Urban Capacity figure of 11,785 dwellings, which has been derived from the latest Strategic Housing Land Availability Assessment (2020). With reference to Appendix 1 of the WLP, the Urban Capacity Figure is broken down as follows:

Table 3: WLP claimed Urban Capacity breakdown by source

Source	Yield
Wider Urban Area	6992
Peel Hall	1200
Waterfront	1070
Garden Suburb (HE consented)	772
Settlements (SHLAA Sites 0.25 ha+)	95
Other SHLAA Sites 0.25ha +	198
Small Sites Allowance (81 dpa)	1458
<b>Total</b>	<b>11785</b>

- 4.3 We now consider whether the yield from each of the above sources of housing land supply are likely to deliver the stated yield during the plan period before reaching a conclusion in respect of whether a discount is justified and should be applied.

### Analysis of Housing Land Supply within the Town Centre and Waterfront Masterplan Area (Policies DEV1 and MD1)

- 4.4 Whilst the production of the 2020 Warrington Town Centre Masterplan (WTCM) and the intention to deliver residential development within and around Warrington town centre is welcomed by Redrow, the certainty of delivery must underpin the strategy for the delivery of housing to meet identified needs across Warrington as a whole.

- 4.5 Redrow's view is that residential-led town centre regeneration initiatives should be driven by the Council and its partners irrespective of the overall housing requirement and the claimed yields from this source should not be at the expense of sites that are known to be deliverable and attractive to the housing market. At the very least, contingency measures should be in place to monitor the delivery of market and affordable housing in Warrington town centre in order that additional land is made available early in the plan period should it become apparent that an insufficient pipeline of viable new developments are coming forward within or around the town centre. A more robust (and evidence led) approach however would be to ensure that a sufficient quantum of deliverable sites are identified now as Housing Allocations within the WLP.
- 4.6 A breakdown is not provided within the WLP or the SHLAA in respect of how many dwellings are anticipated to be delivered in the Town Centre. The Housing Trajectory at Appendix 1 of the WLP provides a breakdown in respect of the Waterfront area which is anticipated to deliver 1,070 during the plan period. Any town centre sites are then included as part of the 'Wider Urban Area', which is claimed to have the capacity to deliver 6,992 units. Redrow consider it would be helpful to make a distinction as to how many of these SHLAA sites are located within the town centre.
- 4.7 The WTCM claims that 8,000 units will be delivered within the Town Centre and Waterfront by 2040. Taking an average delivery rate over the WLP plan period of 2021-2038, this equates to c. 421 units per annum or 7,578 in total. On the assumption that the Waterfront area accounts for 1,070 of these units, this would mean that 6,508 units are to be delivered in the town centre. This just does not equate with the 'Wider Urban Area' capacity of 6,992 dwellings, hence why a detailed breakdown would be helpful. The WTCM also assumes the delivery of significant employment growth at Port Warrington, which is now no longer proposed within the WLP. The implications of the removal of Port Warrington on housing delivery within the Town Centre will need to be reflected in an update to the WTCM.
- 4.8 The pertinent factors to consider when assessing whether there is a realistic possibility that the full yield of 7,578 dwellings within the Town Centre and Waterfront area will be delivered within the plan period as claimed are as follows:
- Consideration of past trends in respect of housing completions;

- Whether the Town Centre Masterplan is realistic and underpinned by robust evidence in relation to deliverability and developability; and
- What are the key infrastructure requirements needed to deliver this quantum of housing and is there sufficient evidence to suggest that that they will be achieved?

*Consideration of past trends in respect of housing completions*

4.9 In respect of past trends, Table 4 below provides details of the historic completion rates across Warrington as a whole over the last 10 years.

Table 4: Net housing completions in Warrington over the last 10 years (2010 – 2020)

Year	2010 / 11	2011 / 12	2012 / 13	2013 / 14	2014 / 15	2015 / 16	2016 / 17	2017 / 18	2018 / 19	2019 / 20	10 yr Average 2010-2020
Net annual completions	527	600	647	693	687	595	513	359	503	541	567

4.10 With reference to the WTCM claim that 8,000 dwellings are to be delivered in the Town Centre and Waterfront areas by 2040, an average completion rate of 421 dwellings per annum needs to be achieved year on year throughout the plan period. This represents 74% of the historic completion rates across Warrington as a whole. At face value this seems to be a wholly unrealistic claim given that a large number of past completions came from the Chapelford Urban Village Strategic site and so this rate of delivery from the Town Centre area alone represents a significant step change.

*Is the Warrington Town Centre Masterplan realistic?*

4.11 Redrow are aware of the recent initiatives taken by Warrington Council and their partners Warrington & Co to direct new housing towards the Town centre and Waterfront Area, which have manifested themselves in the Town Centre Masterplan that forms part of the evidence base supporting the Local Plan. However, it is evident that the identified housing sites within the town centre will only come forward as part of a comprehensive regeneration of large parts of the existing heart of the town. The sites making up this source of the supply are complex. In most instances they have active uses, varied ownerships and



face considerable physical constraints to their development. The majority will only be able to come forward for development in conjunction with adjacent sites, and many require significant infrastructure provision before they can be delivered.

- 4.12 Whilst we appreciate that more information behind the Town Centre proposals has been made available than at previous Local Plan consultation stages, the tangible evidence in relation to deliverability and developability still seems very limited and it is not clear on what basis the Council can have confidence certain sites are deliverable as envisaged.

*Flood Risk and other constraints*

- 4.13 With reference to the WTCM and the updated SHLAA, Redrow have looked at some of the development parcels in more details to see whether they can be considered to be developable in line with the NPPF definition, i.e. ‘a reasonable prospect that they will be available and could be viably developed at the point envisaged’. One of the primary concerns in this regard is flood risk. Table 5 below provides a summary of our findings in respect of the parcels that Redrow do not consider to be developable as a result of flood risk concerns or for other reasons:

Table 5 Assessment of developability of individual Town Centre Masterplan parcels anticipated yield of dwellings during the plan period from the Town Centre and Waterfront masterplanning areas

Location / SHLAA Ref	Total Yield 2021-38 (First completions)	Reason why the parcel is not considered to be deliverable or developable
Wharf Industrial Estate  SHLAA Ref 2482	128  (2030-2035)	Wharf Industrial Estate. Operated by Langtree and the 31 units are largely occupied. The majority of tenants will be in longer term tenancies. Appears to be in viable economic use and the land falls entirely within Flood Zones 2 and 3.
Waterfront Parcels K5 and K7	1,070  (2025-2035 and 2035+)	EIA Screening request (Ref: 2018/33236) for 1,628 residential dwellings on Land at Haviland Park, Lily Waring Gardens and William Square, Arpley Meadows, Warrington (relates to parcels K5 and K7). Confirmed that the proposals constitute EIA development as significant

SHLAA Refs 1633 and 1541		concerns exist in relation to (amongst other matters) flood risk, the delivery of the Western Link, the presence of an 8 inch high pressure ethylene pipeline and the delivery of other necessary infrastructure such as a school, health facility and small scale retail and leisure. Given the extent of the environmental constraints raised and the fact that the site lies partly within and is entirely surrounded by Flood Zone 3a, it is difficult to understand how this site passes both the Sequential and Exception tests when considered against all reasonable alternatives.
Southern Gateway  SHLAA refs 3568, 1753, 1752, 2676a and 2676c	351	The entire area falls within Flood Zone 2. Again, there are concerns with these parcels regarding whether the Sequential and Exception Tests can be satisfied and the technical drainage solution that would be required brings in to question the viability of developing these parcels, particularly when an abundance of better-placed land is available within Flood Zone 1 elsewhere in the borough.  The SHLAA also concludes that SHLAA refs 2676a (Scottish Power) and 2676c (Palatine Industrial Estate) are 'constrained'. These sites form the core of the Southern Gateway area, which brings in to question the deliverability of this area for housing.
<b>Total</b>	<b>1,549</b>	

4.14 Redrow therefore have real concerns regarding the delivery of around half of the claimed yield from the Town Centre and Waterfront areas on the basis that there is simply a lack of compelling evidence presented that this is the most appropriate solution to deliver Warrington's housing needs. Added to this, it would be fair to say that Warrington town centre does not have an established market for high quality town centre living, or the key physical and social infrastructure in place that would make the town centre a desirable place in which to live. These essential building blocks take a long time to implement.

- 4.15 Aside from the above, the residential parcels on the Masterplan simply wash over large areas of land that falls within multiple land ownerships, or is multi-tenanted and with no advanced CPO strategy it is Redrow’s view that a considerable allowance must be made for the non-delivery of sites within these areas, yet no such allowance has been made.
- 4.16 Taking the above into account and to ensure that a realistic view can be taken on the likely (i.e. ‘developable’) yield of housing from this source an appropriate discount should be applied as the evidence clearly points towards this. The level of reduction from the Town Centre and Waterfront Areas is considered in more detail later in this section, as we now go on to consider the implications of the essential infrastructure that is required to deliver this quantum of housing in this location.

*Infrastructure Delivery and Viability Considerations*

Viability Considerations

- 4.17 It also imperative to recognise the reality that the brownfield sites within the Town Centre in particular will face significant viability constraints. To understand the extent of this issue, we have assessed the schedule of Town Centre sites provided at Appendix 4 of the SHLAA (which has been used to justify the proposed site densities) and Table 6 below provides details of the sites that have been approved within the last 3 years.

Table 6: Viability considerations in respect of Major Residential Schemes approved within the Town Centre and Inner Warrington determined within last 5 years

Plan App Ref	Site Address	No. of units	Viability Case (Y/N)	Section 106?
2017/31394	Land at Winwick St / John St, Warrington	362	Y	Y – Only £75,000 towards the Council’s costs in connection with the Travel Plan. No wider infrastructure contributions.
2018/32301	107 Sankey Street, Warrington	18	N/A	N – Scheme therefore makes no wider infrastructure contributions.

2017/31148	Former Kwik Save, Academy Street, Warrington	144	Y	Y – only £70,000 for highways works related to the development. No wider infrastructure contributions.
2017/31836	Former Town Hill Chambers, 1 Town Hill, Warrington	24	N/A	N – Scheme therefore makes no wider infrastructure contributions.
2018/31871	Former A J Beer and Co Timber Yard Site, Station Road, Latchford, Warrington, WA4 2AD	189	Y	N – Scheme therefore makes no wider infrastructure contributions.

4.18 Of the 5 major residential schemes determined within the last 5 years, none of the schemes have been able to withstand any Section 106 contributions towards wider infrastructure needs, such as education, health, open space or strategic infrastructure provision. The three schemes ‘of scale’ were all subject to Viability Assessments and the findings were subsequently (and consistently) found to be accurate and so accordingly the usual Section 106 contributions were not requested.

4.19 There is therefore quite clearly a viability issue with existing sources of Housing Land Supply in the Warrington Town centre and Inner Warrington, which is entirely consistent with the historic low levels of housing delivery in these areas.

4.20 Redrow’s concern regarding the viability of town centre sites is supported by the evidence provided in the Local Plan Viability Assessment prepared by Cushman & Wakefield (August 2021). In respect of the baseline viability position, the following is stated in respect of sites in the Town Centre and Inner Warrington:

*“1.37 The base testing results indicate that the majority of the typologies in the lower value areas of Warrington (Town Centre, Inner Warrington North, Suburb Low Value and Settlement Low Value) are not viable based on full policy requirements.*

*1.38. This can be attributed in part to the lower assumed sales values together with the assumed abnormal / extra over development costs which means that development cannot support the total cumulative cost of all emerging policy requirements in these areas. For the higher density flatted typologies, viability is also constrained by the higher assumed base build costs which are not offset by higher sales values.”*

4.21 The Council then asked for further scenarios to be tested, including 0% affordable housing. The additional modelling confirmed that:

*“1.71... all three Town Centre typologies remain unviable with a nil affordable housing provision if all other appraisal inputs are unchanged (Scenario 1). However, if the sales values are increased, the deficit is substantially reduced with Town Centre 1 and 2 showing a positive viability position in Scenario 2. If the contingency and professional fee allowances are then reduced to a less cautious position, the deficit for Town Centre 3 is reduced although it still remains unviable according to our calculations.*

*1.72. It is noted that there has been little purpose built new build residential development in the Town Centre over recent years and, therefore, as this market matures and new infrastructure and other development is delivered to enhance the Town Centre throughout the plan period, this could see a strengthening in residential sales values. This could improve development viability which may enable more schemes to support the Council’s policy requirements.”*

4.22 It is therefore clear that viability concerns exist to the extent that, for example, no affordable housing is considered viable in respect of Town Centre sites and by association any wider planning contributions towards infrastructure provision through Section 106 agreements are also brought into question. Any improvement to this situation is questionable given that the conclusion reached is that increases in market value *“could improve development viability”*.

- 4.23 The over-reliance upon Town Centre sites to deliver Warrington’s future housing needs therefore has significant impacts upon the ability to deliver the required quantum of affordable housing and make the required planning contributions towards improvements to wider infrastructure provision such as open space, health and education.
- 4.24 We now consider the infrastructure that is required to be delivered to facilitate the delivery of around 6,500 dwellings in the Warrington Town Centre and Waterfront areas.

Infrastructure Delivery

- 4.25 The issues with traffic congestion within and around Warrington Town Centre are well known and the evidence base supporting the Local Plan is mindful of that. The Infrastructure Delivery Plan 2021 (IDP) states:

*“2.9. All of the main development areas require extensive infrastructure to support their development. Details of the anticipated development costs are provided at Appendix 2. The Council has identified the strategic infrastructure requirements of these allocations - over and above standard on-site infrastructure and S106 planning obligations - and included these in the Viability Assessment as a per dwelling cost.”*

- 4.26 Table’s 7 and 8 below summarise the infrastructure requirements related to the Waterfront Area and the Town Centre which, it is important to note, the IDP confirms are in addition to the standard Section 106 requirements.

Table 7: Summary of infrastructure requirements related to the Waterfront Area (as taken from the Infrastructure Delivery Plan 2021)

Topic	Indicative Cost	Funding Confirmed	Funding gap	Funding Source
<b>Developer Delivery Items</b>				
Internal roads	£829,722	£0	£829,722	Developers / private sector
New all purpose bridges across Mersey x 2	£11,330,200	£0	£11,330,200	Developers / private sector

On site strategic highways - Major junction with Western Link	£1,271,721	£0	£1,271,721	Developers / private sector
Riverside Walkway	£870,167	£0	£870,167	Developers / private sector
Riverside path on both sides of Mersey	£538,381	£0	£538,381	Developers / private sector
Link to Town centre via Slutchers Lane	£3,013,750	£0	£3,013,750	Developers / private sector
Network reinforcement (Utilities and Drainage)	£8,010,000	£0	£8,010,000	Developers / private sector
Sub Total	£25,863,941	£0	£25,863,941	
<b>Section 106 items</b>				
Bus service pump priming	£750,000	£0	£750,000	S106
New primary school providing a minimum of 2 forms of entry	£5,649,383	£0	£5,649,383	S106
Secondary School	£4,406,601	£0	£4,406,601	S106
New Health Facility (GP and Dental Surgery)	£1,076,376	£0	£1,076,376	S106
Residential Travel Plan	£94,340	£0	£94,340	S106
Provision of sports pitches	£1,301,274	£0	£1,301,274	S106
Built sports facilities	£1,043,361	£0	£1,043,361	S106
Sub Total	£14,321,361	£	£14,321,361	
TOTAL	£40,185,276	£0	£40,185,276	

Table 8: Summary of infrastructure requirements related to the Town Centre Area (as taken from the Infrastructure Delivery Plan)

Topic	Indicative Cost	Funding Confirmed	Funding gap	Funding Source
<b>Local Road network</b>				
Stadium Quarter Highway Improvement Package (Warrington Transport Improvements Package)	TBC	Unknown	Unknown	Concept only
Town Centre Network Reinforcement	£26,000,000	£0	£26,000,000	Subject of HIF bid, not yet secured
Warrington North Pinchpoints (A49 corridor)	TBC	Unknown	Unknown	Concept only
<b>Other</b>				
Riverside (North of Mersey) Access improvements for cycling and pedestrians, including new walkways	£2,500,000	£0	£2,500,000	Developers / private sector
Heritage Hub	£12,000,000	£1,000,000	£11,000,000	Heritage Lottery Fund / Developers
Cockhedge Medical Centre	TBC	Unknown	Unknown	Expansion needed to accommodate projected growth
<b>TOTAL*</b>	<b>£40,500,000*</b>	<b>£1,000,000</b>	<b>£39,500,000*</b>	

\* Note that a wide range of improvements are proposed to the local highway network on routes to the town centre as identified in Warrington's Local Cycling and Walking Infrastructure Plan which are likely to require a proportionate level of funding from developments proposed within the town centre. Combined, schemes directly related to the town centre require £19,500,000.



- 4.27 What is apparent is that there is a significant level of infrastructure required to facilitate the delivery of the housing envisaged in the Town Centre and Waterfront Areas, despite the fact there are significant and known viability issues to stand even the standard Section 106 requirements.
- 4.28 Looking at Table 7 in respect of the Waterfront Area, not only are these infrastructure costs significant, there is also an expectation that the private sector / developers will provide the necessary funding gap and some of the cost items remain unknown. More clarity on the viability considerations is required as is more certainty about the delivery of this infrastructure.
- 4.29 Even more alarming is the current situation with regard infrastructure delivery in the Town Centre. Significant investment is required into the local road network to facilitate this level of development and quite clearly at this stage, the Council have simply not prepared a credible or robust evidence base in respect of how this infrastructure is to be delivered.
- 4.30 £39,500,000 of known necessary infrastructure costs has been provided, in addition to £19,500,000 worth of improvements to the road network (which has not yet been apportioned towards developments within the town centre), for which no funding has currently been secured. There also appears to be a burden on the private sector and developers to provide the £55,000,000 towards the high level cantilever crossing bridge and no doubt the same will be expected of the majority of the other road network improvements. This is despite the clear evidence (which has been presented here by Redrow and in the Cushman & Wakefield Local Plan Viability Assessment that forms part of the evidence base that there is a fundamental viability issue when bringing forward sites for residential development within the Town Centre and Waterfront areas.
- 4.31 Redrow's view is that a realistic stance must be taken in respect of what is actually viable to deliver in respect of all considerations. At present, there appears to be a disconnect between the quantum of residential development proposed in the Town Centre and Waterfront Areas and the associated viability considerations in respect of the infrastructure needed to support that level of development. At this stage it is quite clear that this quantum of sites cannot be considered 'developable' as there is not a 'reasonable prospect' that these sites 'could be viably developed at the point envisaged' and so on that basis an alternative housing strategy must be adopted in order that the Plan can be found to be sound.

### *Timing of Infrastructure Delivery and the Western Link Road*

4.32 With reference to the Housing Trajectory provided at Appendix 1 of the WLC, another factor that does not appear to have been given due consideration is the impact that the timing of infrastructure delivery will have. The IDP is clear that there is an expectation for the identified infrastructure to be delivered in order that the quantum of residential development proposed can be justified. Yet the Housing Trajectory seems to suggest that 6 years from now, by 2027/28 (Year 7 of the plan period), a total of 1,240 dwellings will have been completed in the Town Centre and Waterfront Areas, first completions are anticipated at Waterfront and a significant quantum of development would already have come forward within the Town Centre (although this is not quantified within the Housing Trajectory and should be). This simply ignores the reality of the time it takes to deliver major road infrastructure and in this case the Western Link Road in particular is key.

4.33 The importance of the Western Link Road is set out at paragraph 2.3 of the Infrastructure Delivery Plan, which states:

*“The Plan’s main priority remains to optimise the development potential of the existing urban area. As such a number of key elements of the previous Plan’s spatial strategy therefore remain. This includes intensifying development in the town centre, the inner area of Warrington and opening up the Waterfront as a new urban quarter facilitated by the proposed Western Link.”*

4.34 It is quite clear therefore that the delivery of the Western Link is critical as it is considered to ‘facilitate’ the opening up of the Waterfront area and quite clearly assist with the intensification of development within the Inner and Town Centre Areas. The timing of delivery must therefore be considered and used to inform the housing trajectory.

4.35 Funding of £142.5m towards the estimated total build cost of £212m was conditionally approved in April 2019 by the Department for Transport and at the time of submitting our previous representation in 2019, the Council stated that over the next two years they would:

*“develop detailed designs, submit a planning application, acquire land required for the scheme, undertake the relevant ecological, environmental and flood risk assessments and engage with residents, businesses and stakeholders, in addition to a number of other significant work packages. We’ll also*

*need to develop an extensive work schedule for the delivery of the Western Link which will constitute one of the largest engineering projects in the North West.” (Source: <https://www.warrington.gov.uk/westernlink>)*

- 4.36 The public consultation exercise was carried out at the end of 2020 and the next major milestone is the submission of the planning application. The public engagement website [www.warringtonwesternlink.co.uk](http://www.warringtonwesternlink.co.uk) indicated that the application was to be submitted in May 2021 and the Council's website now indicates that this has slipped to 'late 2021'. Added to this, a £77.5m funding gap currently exists and so it is difficult to see how an 'early 2023' start of scheme construction can be realistically achieved.
- 4.37 This is a significant infrastructure project that will take years to deliver and so the housing trajectory for the Town Centre and Waterfront in particular needs to allow for an adequate lead-in time for this key piece of infrastructure to be delivered. The route requires bridge crossings to be constructed over the Manchester Ship canal, the West Coast Main Line and Walton viaduct, River Mersey, Fiddler's Ferry and Sankey Brook, Liverpool Road and the St Helens Canal. This is a major engineering operation that requires land acquisition (and most likely CPO), the negotiation of easements and then the time needed to construct the entire route including all the structural work associated with the bridges.
- 4.38 Redrow therefore question published delivery timetable (start on site 2023 and completion of scheme construction early 2026), and consider that a period of at least 8 years should be allowed for the delivery of this major piece of infrastructure, i.e. completion circa 2031. Accordingly, the housing trajectory should reflect this, in particular at Waterfront, which currently has first completions in 2027/28. Our rationale for this is based upon the following timescales, which are based on another similar scheme, the Preston Western Distributor, and this assumes that the detailed information needed to submit a complex planning application of this nature is at an advanced stage of production:
- Early 2022: Submit planning application and CPO process instigated
  - Early 2024: Application determined and Section 106 signed and CPO Inquiry held
  - Early 2025: CPO Inspectors Report released
  - Late 2025: Construction starts
  - Late 2029: Road opens

4.39 There are still risks associated with this timetable, which is considered to be optimistic. The primary risk to these timescales will be securing the necessary rights from third party landowners, for example constructing over the Manchester Ship Canal, which is owned by the Manchester Ship Canal Company. The above timetable relies upon a seamless CPO process and for negotiations with all third party landowners to run smoothly.

#### *Summary and Recommended Changes*

4.40 Redrow have a number of fundamental concerns with the housing strategy as it relates to the Town Centre and Waterfront areas, which can be summarised as follows:

- The claimed annual completion rate of 421 dpa from the Town Centre and Waterfront areas based upon the Warrington Town Centre Masterplan is considered to be overly optimistic in consideration of past trends in Warrington;
- A number of the identified SHLAA sites lie within Flood Zones 2 and 3 and so from a sequential perspective, other sites are available and better placed to meet housing needs within Flood Zone 1, especially within the context of the Green Belt review that is being undertaken as part of the Local Plan preparation process;
- The complexity of land ownership and tenancies has not been taken into account when producing the Town Centre Masterplan and so a non-delivery rate must be applied from this source of housing land supply;
- The considerable length of time needed to deliver the Western Link Road has not been factored in to the Housing Trajectory for the Waterfront Area in particular and so a considerable lead-in time should be allowed for before the development can be considered capable of delivering a significant quantum of housing (10 years is suggested).

4.41 In order to assist, Redrow now seek to quantify the reduction that should be applied taking these fundamental concerns in to account and the following summarises the recommended position.

Table 9: Redrow’s position in respect of the discount that should be applied to the housing trajectory for the Town Centre and Waterfront Areas

Description	Town Centre	Waterfront
Total dwellings 2021-2038	6,508*	1,070
<p>Flood Risk (with reference to Table 5 of this representation)</p> <p>Town Centre –</p> <p>Wharf Industrial Estate (SHLAA ref 2482, 128 units). The land falls entirely within Flood Zones 2 and 3. Also, the 31 industrial units are largely occupied, with any vacant units advertised To Let and so appear to be in viable economic use;</p> <p>Southern Gateway (SHLAA Refs 3568, 1753, 1752, 2676a and 2676c, 351 units) - lie entirely within Flood Zone 2 and should be removed from the developable supply on the basis that sequentially, other more suitable sites are available in Flood Zone 1).</p> <p>Waterfront –</p> <p>Parcels K5 and K7, K9, K10, K12 are partially within Flood Zones 2 and 3a and so a reduction of the site’s total capacity of 1,070 dwellings (-25% suggested based upon the area of land affected by flood risk) should be applied, which equates to a reduction of 268 dwellings.</p>	-479	-268
<p>Non-delivery rates</p> <p>Town Centre –</p> <p>The WTCM claims that 8,000 units will be completed in the Town Centre, which equates to 421 dwellings per annum. Given that average annual completions in Warrington as a whole have averaged 567 per annum over the last 10 years it is unrealistic to suggest that 421 will be delivered per annum throughout the entirety of the plan period. In the town centre alone</p>	-646	

<p>Taking a generous approach and being mindful of the significant viability concerns and infrastructure funding deficit that exists, Town Centre sites should equate to no more than 25% of the yield from the 'Wider Urban Area' (6,992) as set out at Appendix 1 of the WLP. This equates to a yield of 1,748 from this source.</p> <p>The above discounts would be integrated into the overall reduction.</p>		
<p>A significant lead-in time (10 years) applied to the Housing Trajectory for the Waterfront Area to allow for the delivery of the Western Link Road. Adjusting the trajectory so that first completions now begin at 2030/31 would see this source of housing land supply reduce by 595 dwellings.</p>		-290
<p>Redrow Total following reductions</p>	1,748	512
<p>Total shortfall in supply from Warrington Town Centre and Waterfront masterplan areas</p>	-5,318	

\*In the absence of a detailed breakdown in the updated 2021 SHLAA, the yield from the Town Centre is taken from the WTCM yield of 8,000 units completed by 2040, which equates to 421 dwellings per annum.

- 4.42 This in our view still remains a very generous assessment as the principle and achievability of housing on the vast majority of the identified sites in terms of technical considerations has not been demonstrated in any detail. Neither can the market appetite for bringing these sites forward be assumed with any confidence given the non-existence of a stable housing market in this area, as confirmed within the Local Plan Viability Assessment (August 2021). Given the constraints and considerations associated with facilitating this kind of comprehensive regeneration of a town centre, the current yield from this source of Housing Land Supply is considered to be wholly unrealistic.
- 4.43 In Redrow's view, it is therefore a considerable risk for the Warrington Local Plan housing strategy to be relying on sites within Warrington Town Centre and the Waterfront Area to make such a significant contribution towards housing needs over the Plan Period.
- 4.44 Redrow also request that further clarity is provided in respect of the breakdown of sites anticipated to be delivered within the Town Centre as there appears to be a mismatch between the 8,000 units by 2040

set out in the 2020 WTCM and the yield from the Wider Urban Area asset set out in the Housing Trajectory Appendix 1 of the WLP.

- 4.45 In light of the concerns outlined above, which go to the heart of the soundness of the Local Plan, a discount of 5,318 dwellings (subject to clarification of the Town centre breakdown) should be applied to this particular source of housing land supply and new sites should be identified for housing development to make up this shortfall. In this case it would need to be additional sites released from the Green Belt.

#### Analysis of supply from SHLAA sites outside of the Town Centre (Policy DEV1)

- 4.46 Another area of concern is whether realistic assumptions have been made in respect of the anticipated number of dwellings to be delivered within the existing urban area and whether they are founded upon credible evidence.
- 4.47 The recently revised NPPF (2021) confirms the definition of what constitutes a deliverable and developable site. Annex 2 states:

**“Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

- 4.48 It goes on to state:

“**Developable:** To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.”

4.49 Paragraph 71 of the NPPF states that:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”

4.50 We now carry out an analysis of this source of housing land supply within the Warrington urban area in the context of these key policy considerations.

#### *Assessment of claimed supply from the Wider Urban Area*

4.51 As set out in Section 2 of this representation, the SHLAA Sites in the existing urban area (outside of the Town Centre and Waterfront masterplan areas) are anticipated to deliver 6,307 dwellings during the plan period, which equates to 315 dwellings per annum. The Housing Trajectory set out at Appendix 1 of the WLP is based upon those SHLAA sites that the Council consider to be developable in accordance with the planning guidance set out above and also includes sites located within the Town Centre.

4.52 Redrow do have concerns however with the validity of the Council’s claim that all of the SHLAA sites that have been identified are developable. Of concern is the following extract from the updated 2020 SHLAA:

*‘3.19 This site sifting exercise and re-assessment of stalled sites means that the large sites with planning permission that are included in the short to mid-term (0-5 years and 6- 10 years) outstanding capacity have a high degree of certainty of coming forward. As has the Small Sites Allowance, which is based on historic completions data. This sifting and re-assessment exercise provides confidence in the data used for the supply position and as a result there is no need to include an additional ‘lapse’ or non-delivery rate.’*

4.53 This suggests that SHLAA sites that have been the subject of a now expired planning permission could still remain within the ‘developable’ housing land supply, but have simply been pushed further back into the



plan period. Planning Practice Guidance<sup>3</sup> requires a reasonable estimate of build out rates to be provided and for the evidence base to set out exactly how any barriers to delivery could be overcome in respect of specific sites.

- 4.54 It is therefore incumbent upon the Council, to adequately test the reasons as to why individual sites may not have come forward. For example, in respect of a site's availability this could mean establishing whether there are any unresolved multiple ownerships that may have resulted in the site not coming forward for development. This would normally be through a review of the Call for Sites responses (or lack thereof). PPG states that in such circumstances:

*'When assessing sites against the adopted development plan, plan-makers will need to take account of how up to date the plan policies are and consider the relevance of identified constraints on sites / broad locations and whether such constraints may be overcome.'* (Paragraph: 018 Reference ID: 3-018-20190722).

- 4.55 This exercise does not appear to have been undertaken in respect of the SHLAA sites in the urban area that might historically have been stalled.
- 4.56 This is particularly important in Warrington, because it has been acknowledged that there is insufficient capacity within the existing urban areas to accommodate housing needs for the plan period, which has triggered the exceptional circumstances necessary to undertake a review of the Green Belt and allocate sites accordingly. The baseline supply position is therefore particularly critical in Warrington as a result.
- 4.57 On this basis, Redrow consider that a non-delivery rate of 10% from this source of housing land supply is entirely justified and additional Green Belt sites should be identified as new Housing Allocations to make up the shortfall in the baseline supply position.

#### Summary and Recommended Changes

- 4.58 In order to account for the potential (and as the evidence suggests, likely) non-delivery of some SHLAA sites within the 'Wider Urban Area' Redrow are of the view that a non-delivery rate of 10% should apply.

---

<sup>3</sup> Paragraph: 026 Reference ID: 3-026-20190722

The quantum of housing from this source of housing land supply should therefore be **reduced by 699 units**.

### Analysis of South East Warrington Urban Extension (Policy MD2)

4.59 Redrow do not object to the principle of including the South West Warrington Urban Extension (SEWUE) Garden Suburb as a Main Development Area within the WLP, but it is necessary to test whether the site is capable of delivering the level of housing set out within the Housing Trajectory provided at Appendix 1 of the WLP. Specifically, the following factors need to be considered:

- Is the lead-in time and delivery rate appropriate when considered against industry research and past trends in Warrington?
- The need to adjust lead-in times and delivery rates to account for the delivery of 'major' infrastructure items.

4.60 These areas of concern are now considered in more detail, with appropriate evidence provided where relevant. First however we provide the context of the baseline position as set out in the WLP to assist with our analysis.

#### *Baseline Position*

4.61 The Housing Trajectory confirms that the SEWUE is anticipated to deliver 2,400 dwellings during the plan period on the Green Belt land and 772 on the Homes England consented SHLAA sites. Average maximum completions of 180 per annum are anticipated to be achieved on the Green Belt land following the completion of the existing consented sites in 2027/28.

4.62 This represents 20% of the overall housing requirement of 16,157 established under Policy DEV1, and so it is essential that the assumptions being used to underpin this rate of housing delivery are robust and realistic.

4.63 The 'South East Warrington Urban Extension – A Deliverable Proposition' prepared by Homes England and Miller Homes in August 2021 forms part of the WLP evidence base and so underpins the proposed

housing trajectory. An Indicative masterplan is provided, which sees the residential element delivered along with Local Centres, Education, Healthcare and Community uses and extensive green infrastructure.

#### *Lead-in time and delivery rates*

- 4.64 The housing trajectory separates out the 'SHLAA Sites (HE consented)' as this is land that is not within the Green Belt and benefits from planning permission, equating to a total of 772 units to be delivered between 2021/22 and 2027/28 and so we consider this element first. Three separate planning permissions have been approved, the first for 180 homes on land at Pewterspear Green Road, the second for 370 homes at Appleton Cross and 400 homes at Grappenhall Keys, activity has already commenced on site, with various reserved matters and condition discharge applications having been submitted and so the initial lead in time relating to this site is considered appropriate.
- 4.65 The housing trajectory then anticipates that all 772 dwellings will be completed by 2027/28 and Redrow consider that it is realistic for the full yield to be delivered within the plan period.
- 4.66 It is pleasing to note that the Housing Trajectory has been amended in respect of the Green Belt sites, which better aligns with the comments raised by Redrow in response to the 2019 consultation. The scale of development proposed has also been significantly reduced, with 2,400 units now anticipated during the plan period, as opposed to the 5,131 envisaged at the Proposed Submission Version stage.
- 4.67 In respect of lead in times, Redrow felt that 2024/25 was an appropriate timescale for first completions on the Green Belt land in the 2019 consultation response and the Housing Trajectory at Appendix 1 of the WLP states 2025/26 for first completions, which accounts for the delay in Local Plan production. A reasonable lead in timeframe has therefore been anticipated.
- 4.68 Delivery rates as high as 225 per annum were included within the 2019 Housing Trajectory, but the maximum yearly completion rate is now anticipated to be 180 units per annum, which more closely aligns with the maximum 171 units per annum that Redrow felt was achievable based upon industry evidence and their own experience of delivering housing on strategic sites in the north west, such as Buckshaw Village.

- 4.69 Redrow also benchmarked their assumptions with the delivery rates achieved at Chapelford Urban Village. The site initially obtained planning permission in 2002, first completions were in 2004 and a total of 2,110 homes were subsequently delivered up until 2017. Over a period of 13 years therefore, an average build rate of 162 dpa was achieved at Chapelford, which is entirely consistent with the evidence presented here by Redrow in respect of the anticipated rate of delivery at the SEWUE, i.e. 171 dwellings per annum.
- 4.70 Whilst the delivery rates are slightly higher than Redrow's anticipated 171 completions per annum, they are not drastically in excess of this and so it is considered a reasonable approach has been taken. Redrow's view in respect of the quantum of housing that will realistically be delivered at the SEWUE during the plan period 2021 to 2038.

### Analysis of Fiddler's Ferry (Policy MD3)

- 4.71 Fiddler's Ferry is a new inclusion within the WLP having not been identified as a site capable of helping to meet Warrington's housing and employment needs at any stage of the local plan preparation process so far. It has been included at the expense of other sites, such as Port Warrington, which was proposed to deliver 75 hectares of employment land and a reduction of 1,800 homes at the Garden Suburb in South Warrington, along with a general reduction in the amount of land to be removed from the Green Belt for housing. Redrow have some concerns in respect of the inclusion of the Fiddler's Ferry site.
- 4.72 To justify the inclusion of Fiddler's Ferry, the evidence base includes a Masterplan (April 2021), Regeneration Vision (August 2021) and a Density Assessment (April 2021), all of which have been prepared by SLR on behalf of the landowner Scottish and Southern Energy Plc. An experienced land promoter or developer is not therefore actively promoting the site. It is intended that Fiddler's Ferry will deliver 1,310 homes and 101 hectares of employment land during the plan period.
- 4.73 It is clear from reading the above supporting evidence base documents that detailed technical work to inform feasibility and viability considerations has not been undertaken on what is an extremely complex site. For example, critical to the delivery of the housing proposed to the south of the railway line will be the ability to access the land. A bridge is currently in situ across the railway line, however this incorporates a number of pipelines and it is clear from the Regeneration Vision document that no technical feasibility work has been undertaken to assess the capability of the bridge to accommodate the traffic and vehicle movements necessary to serve the site. If the bridge needs replacing this represents a significant cost that

could have a severe impact upon the ability to deliver housing to the south of the railway line on a viable basis.

- 4.74 The main complex of the Power Station site is identified as a Defined Employment Area in the current development plan, with the land to the immediate east and land to the south of the railway line designated as Green Belt. A Green Belt Assessment of the Fiddler's Ferry site has therefore been undertaken and it concludes that the Green Belt land to the north of the railway line makes a 'Strong Contribution' to the Green Belt and the land to the south of the railway line a 'Moderate' contribution. With reference to the 2016 Green Belt Assessment, just 5 of the 25 parcels assessed at Stage 1 made a Strong Contribution, one of which was the northern parcel at Fiddler's Ferry as it provides a critical separation function between Warrington, Widnes and Runcorn. None (or no part) of the other four Stage 1 Parcels considered to make a 'Strong Contribution' towards the Green Belt have been identified for release. Redrow therefore question the approach being taken at Fiddler's Ferry from a Green Belt perspective as it is inconsistent with previous stages of the Local plan preparation process, which have avoided the release of critical locations that make a 'Strong Contribution' to the five purposes of the Green Belt.
- 4.75 The decommissioning of the existing Power Station, the land remediation necessary and the key infrastructure needed to deliver the scale of development proposed will have a major impact on viability. In the absence of a detailed Viability Appraisal demonstrating that the quantum of housing and employment land proposed can be delivered, and notwithstanding the concerns outlined above, Redrow question the inclusion of Fiddler's Ferry at this late stage of the process in the absence of compelling evidence to the contrary.

## 5. Suggested Site Allocation: Land west of Culcheth, Warrington

- 5.1 As the analysis in Section 4 of this representation outlines, Redrow consider that additional land needs to be identified for release from the Green Belt if Warrington's housing needs are to be met in full. It is within this context that Redrow are promoting land to the west of Culcheth as a suitable site for residential development. The Call for Sites reference and description is R18/P2/020 (Land at Kirknall Farm).
- 5.2 A detailed Masterplan and Development report, produced by Cass Associates (September 2018) is included at Appendix A to this representation. This Masterplan and Development Report has previously been submitted to the Council and accompanied Redrow's representations at the Proposed Submission stage of the Warrington Local Plan (WLP) in June 2019.
- 5.3 The report confirms that the site is available, suitable and achievable with a realistic prospect that housing will be delivered on the site within five years. It could therefore be considered 'deliverable' in accordance with the definition provided at Annex 2 of the National Planning Policy Framework (NPPF, 2021), should the site be allocated for residential development. The site is being promoted by Redrow, a major volume housebuilder with a proven track record of delivering high quality housing developments across the North West.
- 5.4 As Section 4 above highlights, Redrow consider that a shortfall of approximately 5,318 dwellings exists in Warrington's proposed housing land supply across the Plan period. In order for Warrington to meet its minimum housing requirement needs, Redrow consider it will be necessary for the Council to propose new Housing Allocations. Notwithstanding this position, Redrow also strongly submit that the Land west of Culcheth is more suitable and sustainable for development than the only Culcheth allocation within the WLP (Land at Warrington Road). Land west of Culcheth, Warrington is a logical extension to the settlement and the site is considered capable of delivering around 350 to 450 new homes, which is a significant and sustainable contribution towards Warrington's housing needs.
- 5.5 The following section provides a justification to direct additional housing growth towards Culcheth as a settlement in particular.

### Justification to identify new Housing Allocations in Culcheth

- 5.6 Redrow support the conclusion of the WLP that exceptional circumstances exist to justify the release of Green Belt land to meet housing needs.
- 5.7 It is noted that the WLP has reduced the volume of Green Belt release proposed from 1,210 ha (11% of total) in the previous Proposed Submission Version Local Plan to 580 ha (5% of total). Redrow do not support the reduction of Green Belt release in the Local Plan. As Section 4 of this representation has highlighted, it is a significant risk for the WLP housing strategy to rely upon Warrington Town Centre and Waterfront Area in particular to make such a considerable contribution towards meeting housing needs. In fact, Redrow consider that additional sites, including the Land West of Culcheth, must be identified for development and proposed for release from the Green Belt to ensure Warrington's housing needs, including affordable housing, are met in full.
- 5.8 As outlined in Section 2, at the very least, the WLP must ensure sufficient safeguarded land is allocated and an appropriate trigger mechanism included within the Plan to ensure Warrington Borough Council can achieve, and then maintain, a five year housing land supply.
- 5.9 Paragraph 3.3.14 of the WLP states that as part of the spatial strategy, incremental growth within the settlements (outside the main urban area of Warrington) will:
- “...provide housing choice and help support local services without placing unacceptable pressure on local infrastructure...”*
- 5.10 As part of this strategy, the WLP allocates around 800 homes within the outlying settlements, including a minimum of 200 homes towards Culcheth and has identified a single Housing Allocation under Policy OS2 ('Culcheth'), Land east of Culcheth to be removed from the Green Belt in order to meet this target. Redrow consider that as part of identifying additional housing allocations, more growth should be directed to sustainable locations for growth in the outlying settlements, as Section 2 of this representation has highlighted. Culcheth in particular should have additional growth directed towards the village, given its status as one of only two outlying settlements included as a 'neighbourhood centre' within the 'Hierarchy of centres' proposed by draft policy DEV5. This provides clear justification for an increased proportion of housing growth to be directed towards Culcheth.

- 5.11 This allocation at Land east of Culcheth is carried forward from the previous Post Submission Version of the WLP (2019). Notably however, this differs from the Preferred Development Option Consultation (July 2017), which proposed a distribution figure of 300 for Culcheth. As Culcheth is the second largest outlying settlement, behind Lymm, Redrow view the reduction in housing target for Culcheth as unjustified and consider that the sustainability of Culcheth as a settlement means that the village could support more growth, without the unacceptable pressure on local infrastructure that the Plan seeks to avoid. The fact that the Plan has only identified a single allocation in Culcheth may compromise the ability of Culcheth to meet its own local housing needs and will not widen the choice of housing, including affordable housing, available in the village.
- 5.12 The **Settlement Profile** for Culcheth that formed part of the Evidence Base for the 2017 consultation (2017, Warrington Borough Council) confirms the sustainability of the village, due to the accessibility of a range of shops and services within Culcheth. The Settlement Profile confirms that there are three Primary Schools, a Secondary School and two GP surgeries. The neighbourhood centre, in 2017, contained amenities including a library, village hall and three churches in addition to two supermarkets and two banks. In addition, the profile outlines the presence of a community centre, 2 scouts/rangers and one children's centre. The Settlement Profile also outlines the range of leisure facilities and sports pitches available within the village.
- 5.13 The Settlement Profile analysis concludes that additional growth in Culcheth can be accommodated subject to expansion of primary school provision, providing the opportunity to provide up to 300 homes in addition to the 70 identified in the SHLAA. The profile concludes that such incremental growth could enable sustainable development within Culcheth whilst respecting the settlement character objectives.
- 5.14 The **Sustainability Appraisal Report** (dated August 2021) outlines at Paragraph 6.2.6 that the spatial strategy confirms that:
- “... an incremental approach to growth would be taken at the outlying settlements. Broadly speaking, this involves a higher amount of growth being directed to Lymm and Culcheth as these are the larger settlements with a broader range of services.”*
- 5.15 Appendix B of the **Sustainability Appraisal Report** (AECOM, August 2021) provides an appraisal of the likely significant effects depending on the growth aspirations and spatial strategy pursued by the Plan. It is



acknowledged that some settlements, including Culcheth could absorb incremental growth without having a negative effect on health services. It is also acknowledged that development at Lymm and Culcheth is more likely to be accessible to a wider range of services and facilities. In an increased dispersal scenario, the SA outlines that greater dispersal to outlying settlements may support new facilities and services in areas including Culcheth and Lymm. Culcheth (alongside Burtonwood and Winwick) is also described as “perhaps less sensitive” in built heritage terms, compared to other settlements.

- 5.16 The sustainable credentials of Culcheth are acknowledged by the *Sustainability Appraisal Report* and other Local Plan evidence base documents. In addition, Culcheth and Lymm are the only outlying settlements to be classed as a “Neighbourhood Centre” in the hierarchy of centres under Policy DEV5 (Retail and Leisure Needs). Therefore, the evidence clearly justifies a much higher housing distribution figure than the 200 dwellings currently proposed, particularly as the settlement is constrained by the Green Belt (resulting in a limited capacity within the urban area to contribute towards Local Housing Needs, including affordable housing needs).
- 5.17 Table 10 below outlines each of the outlying settlements proposed in respect of the percentage housing growth proposed in the WLP, with regard to their existing size. Culcheth has the second lowest level of housing growth proposed (just 8%), second only to Lymm’s percentage growth of just 6%. Culcheth’s growth is limited to a single site, where as Lymm’s is distributed across two sites. As outlined above, Culcheth and Lymm are the most sustainable outlying settlements in the Warrington Borough and the Table confirms that there is a constrained level of housing growth in both settlements, despite their Neighbourhood Centre status and capacity of the settlements to accommodate a much higher number.
- 5.18 There is no justification provided to direct a higher proportion of incremental growth towards less sustainable settlements, constraining the level of housing growth in Culcheth to this extent.

Table 10 WLP distribution towards the outlying settlements.

Settlement	No. of existing households (2017)	WLP allocations (2021)	% increase in households
Croft	606	75	12%
Culcheth	2, 495	200	8%
Hollins Green	371	90	24%

Lymm	4,961	306	6%
Winwick	866	130	15%

5.19 We have also carried out a comparison with the 2017 Preferred Development Options consultation and the 2019 Proposed Submission Version consultation which are set out in Table 11 below. As the allocation at Burtonwood has been removed, its % change since 2017 is the greatest. Excluding Burtonwood, Culcheth and Lymm are the only other settlements to have their housing growth figures reduced, despite being the most sustainable outlying settlements.

Table 11 Summary of WLP distribution towards the outlying settlements and comparison with 2017 preferred options & 2019 Proposed Submission

Settlement	WLP allocations (2021)	WLP allocations (2019)	Change (%) 2019 to 2021	WLP allocations (2017)	Change (%) 2017 to 2021
Burtonwood	0	160	-160 (-100%)	150	-150 (-100%)
Croft	75	75	0 (0%)	60	+15 (+25%)
Culcheth	200	200	0 (0%)	300	-100 (-33%)
Hollins Green	90	90	0 (0%)	40	+50 (+125%)
Lymm	306	430	-124 (-28%)	500	-194 (-39%)
Winwick	130	130	0 (0%)	90	+40 (+44%)
<b>TOTAL</b>	<b>801</b>	<b>1,035</b>	<b>-234 (-23%)</b>	<b>1,190</b>	<b>-389 (-33%)</b>

5.20 As in 2019, no evidence is provided to justify the reduction of housing proposed in Culcheth since the 2017 version and secondly, why such a low level of housing growth is appropriate for a sustainable settlement of this size with greater accessibility to key facilities within the Neighbourhood Centre.

5.21 In the interests of planning for sustainable growth and in the context of Redrow's concerns regarding the potential shortfall from other sources of housing land supply, our view is that a much higher level of housing growth should be directed towards Culcheth.

## Quantifying the appropriate level of housing growth for Culcheth

- 5.22 Setting aside Lymm, which as the second largest urban area in Warrington Borough and has also been inexplicably constrained, the average levels of growth in Croft, Hollins Green & Winwick (all significantly smaller and less sustainable settlements than Culcheth) is 17%. Applying this to Culcheth would result in a baseline housing target of 424 (17% growth in relation to the 2,495 existing households). Adjustments to this figure would then need to be made to allow the delivery of infrastructure, boost the supply of affordable housing and making up the anticipated shortfall from other sources of housing land supply.
- 5.23 Redrow's anticipated shortfall from existing sources of housing land supply, including the constrained capacity of the urban area, should be addressed through the identification of new housing allocations in the Green Belt. The baseline housing distribution figure of 424 proposed for Culcheth above, represents just 2.6% of Warrington's total requirement (16,157) over the Plan period. A slightly higher amount of incremental growth at Culcheth would still be in keeping with the overall spatial strategy of the WLP, which encourages incremental growth at outlying settlements.
- 5.24 Applying the same proportionate percentage to the anticipated 5,318 shortfall would see Culcheth delivering a further 138 dwellings, increasing the distribution figure to 562 dwellings. This is simply an updated baseline figure based purely upon the size of the existing settlement and a realistic quantum of housing delivery from all sources of housing land supply across the plan period.
- 5.25 As outlined above, the *Sustainability Appraisal Report* (SA) recognises that an 'incremental' approach to growth in the outlying settlements would be taken. Paragraph 6.2.6 confirms that broadly speaking "*this involves a higher amount of growth being directed to Lymm and Culcheth as these are the larger settlements with a broader range of services*". As outlined above, this strategy is not followed through with respect to the levels of proportional growth proposed at the outlying settlements.
- 5.26 The *Sustainability Appraisal Report* (AECOM, August 2021) mentions Culcheth in the context of a number of key indicators, as having the ability to accommodate a greater level of growth due to its role as a neighbourhood centre. It is acknowledged that some settlements, including Culcheth could absorb incremental growth without having a negative effect on health services. It is also acknowledged that development at Lymm and Culcheth is more likely to be accessible to a wider range of services and facilities. It should also be noted that Culcheth supports the day to day needs of residents elsewhere in

the Borough, such as Croft and Glazebury. In an increased dispersal scenario, the SA outlines that greater dispersal to outlying settlements may support new facilities and services in areas including Culcheth and Lymm. Therefore, it is entirely justified to conclude that a greater level of housing growth in Culcheth would support existing facilities and contribute towards increasing school capacity and GP provision, which would also benefit a wider catchment area than just Culcheth itself.

- 5.27 In addition to the sustainability of the settlement, Culcheth (alongside Burtonwood and Winwick) is also described by the SA as “perhaps less sensitive” in built heritage terms, compared to other settlements and is therefore able to accommodate higher levels of growth without resulting in development affecting heritage assets.
- 5.28 It is in this context that it is Redrow’s view that the baseline figure 562 dwellings should be increased to ensure a sufficient critical mass of housing at Culcheth, which will result in tangible social and economic benefits alongside new housing. In our view, a housing distribution figure of circa 600-700 homes to Culcheth is entirely reasonable, considering the sustainability credentials of the settlement and the need to ensure Green Belt boundaries endure beyond the Plan period, in accordance with the National Planning Policy Framework (NPPF).
- 5.29 Growth of between 600-700 homes equates to an approximate increase in the size of the settlement of between 24-28%. Hollins Green is currently proposed to grow by 24% and so this approach is endorsed by the WLP. In fact, as the *Sustainability Appraisal* highlights, higher levels of growth at Culcheth and Lymm is a sustainable strategy, as the outlying settlements with the most accessible range of shops, services and facilities. This growth of the settlement by approximately 24% is adjusted upwards proportionately from the average 17% of growth at outlying settlements, as outlined above in Paragraph 2.22 due to the housing supply shortfall Redrow has estimated will occur based upon the evidence supporting the Plan.
- 5.30 A housing distribution figure of between 600-700 homes is entirely appropriate for Culcheth as a settlement and will enable an increase in delivery of much needed affordable housing in the village. Occupiers of affordable housing typically have lower levels of car ownership and so accessible shops and services, such as those available in Culcheth, are even more important for such residents.

5.31 As outlined above, a housing distribution figure of around 600-700 homes is entirely appropriate and proportionate to the size of the settlement and range of accessible shops and services within the Neighbourhood Centre.

### Justification to identify Land West of Culcheth (Land at Kirknall Farm) as a new Housing Allocation

5.32 It has been demonstrated that further housing allocations should be identified in Culcheth in order to ensure sufficient growth is directed towards the most sustainable outlying settlements. Redrow has been promoting Land West of Culcheth (also known as Land at Kirknall Farm) throughout the Local Plan process and the Masterplan and Development Report, provided at Appendix A, provides a detailed justification for the site's inclusion as a Housing Allocation. The site is capable of delivering c. 350 to 450 homes.

5.33 As Appendix A notes, the Deposit Draft of the Warrington Borough Local Plan included this site as the single Area of Search around Culcheth. The Draft Local Plan Inspector's Report supported the rationale for safeguarding land around Culcheth and Lymm (the two largest villages) and clearly the site assessment process deemed this site the most appropriate and sustainable location for the growth of the village. It is not clear why the allocated site at Warrington Road is now considered more sustainable than the Land East of Culcheth, which has clearly been previously assessed as the most sustainable location for growth in Culcheth.

5.34 The *Sustainability Appraisal Report* prepared by AECOM (August 2021) assessed the site west of Culcheth, promoted by Redrow (Site ID 1522 – Land at Kirknall Farm, Culcheth). A reproduction of Table 6.3 in the Sustainability Appraisal for the Site promoted by Redrow and the sites which make up the allocation 'Land East of Culcheth' to aid comparison and to accompany the following assessment is shown in Figure 2 below.

Figure 2: Reproduction of Table 6.3 of the SA Report (August 2021, AECOM).

Site ID	Site Name	EC1 – Loss of employment land	EC2 – Distance to Principal Road Network	EC3 – How close to key employment facilities	HW1 – Supported by community facilities	HW2 – Access to local natural greenspace	HW3 – Access to formal play space	ACC1 – Access to nearest primary school	ACC2 – Access to nearest secondary school	ACC3 – How well served is the site by a bus	ACC4 – How accessible is the site to train Station	ACC5 – Distance to GP service/ health centre	HOU1 – Will development meet housing need	NR1 – Potential impacts on air quality	NR2 – Remediation of contaminated land	NR3 – Loss of High Quality Agricultural Land	NR4 – Groundwater Source Protection Zone	NR5 – Site within identified flood zone	RU3 – Potential to safeguard/ sterilize minerals	BNH1 – Proximity to designated heritage assets	BNH2 – Effect upon heritage assets	BNH3 – Capacity for landscape to accommodate	BG1 – Impact on European Site/ SPA/ SAC	BG2 – Potential impact on SSSI	BG3 – Potential impact on Local Wildlife Site	BG4 – Potential impact on TPOs	RU1 – Use of previously developed land	RU2 – Access to HWRC	
1522	Land at <del>Kirknall</del> Farm (Land west of Culcheth)	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
3157	Land at Warrington Road	Green	Green	Green	Green	Yellow	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
3337	Land at Lion's Den	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green

Red	Mitigation likely to be required/ unavoidable impacts
Yellow	Mitigation may be required/ unavoidable impacts
Light Green	Unlikely to have a major impact on trends
Dark Green	Promotes sustainable growth

5.35 The site scored green ('promotes sustainable growth') in 7 categories assessed, including:

- EC2. Distance to Principal Road Network
- EC3. How close to key employment sites
- HW3. Access to formal play space
- ACC1. Access to nearest primary school
- ACC2. Access to nearest secondary school
- ACC3. How well served is the site by a bus
- ACC5. Distance to GP service/ health centre.

5.36 The site west of Culcheth was assessed as red ('mitigation likely to be required/ unavoidable impacts', not our emphasis) for only one assessment category – BG3. Potential impact on Local Wildlife Site. As outlined below in the overall site conclusions, the Local Wildlife Site can be avoided and indeed the Masterplan included at Appendix A demonstrates this clearly. Culcheth Linear Park runs along the edge of the site

and would provide a recreational route for future residents, avoiding recreational pressure upon the Local Wildlife site.

- 5.37 The ***Development Options and Site Assessment Technical Report*** (September 2021) assess the Land West of Culcheth (Land at Kirknall Farm). The overall Site Conclusions based on Suitability, Availability, Achievability notes:

*“The site is considered to be suitable-unlikely to have a major impact on trends. The only suitability issues are the distance to a train station (3-5km) and the Local Wildlife Site which is located to the north west of the site however this could be avoided. The site has accessibility to formal play space, primary and secondary schools and GP surgery’s. The site is considered to be achievable, it is within an area of moderate viability and there are no known abnormal development costs. The site is considered to be available as it was promoted by the owner and is not in active use.*

#### Workshop Comments

*The site is adjacent to the settlement of Culcheth being located to the south west of the settlement. The site is considered to be in a sustainable location and is free from ownership issues, having been promoted by the site owner. There are no known abnormal development costs and the site is in a location of moderate viability. There is a Local Wildlife Site within the site located at the north west end however this could be avoided. The HS2 Phase 2b safeguarded area is located close to the south of the site along part of the Culcheth Linear Park however the site is significantly larger than the area required to bring forward Culcheth’s housing requirement, so any constrained parts of the site could be avoided. The Council’s highways officer has advised that a reduced capacity of up to 300 dwellings could be served off Swinhoe Place, provided it was via a loop road arrangement and emergency vehicle access points were also provided. As such, development of the site would be in accordance with draft Warrington Local Plan objectives: W1 to strengthen existing neighbourhoods; W2 to facilitate the sensitive release of Green Belt; W4 to provide new infrastructure to support Warrington’s growth and W6 to minimise the impact of development on the environment.*

*However, when compared to the other two contender sites off Warrington Road (SHLAA Ref: 3157/ Site Ref: R18/P2/069) and (SHLAA Ref: 3337/ Site Ref: R18/P2/064) the site performs better (moderately as opposed to weak) in terms of its contribution to the functioning of the Green Belt and*

*there is only a footway on one side of Wigshaw Lane for significant parts of its length with no opportunity for improvement.*

*Therefore, when compared to the other two sites off Warrington Road development of this site would perform the same in respect of objectives W1 (to strengthen existing neighbourhoods) and W6 (to minimise the impact of development on the environment) of the draft Warrington Local Plan but would perform less well in respect of objective W2 (to facilitate the sensitive release of Green Belt) and W4 (to promote sustainable modes of transport)."*

- 5.38 This constitutes an extremely favourable assessment of the site, which concludes that the allocation of the site would fully accord with the draft WLP objectives: W1, W2, W4 and W6. Redrow also consider that the development of the site would constitute high quality design which reinforces the character and local distinctiveness of Culcheth, a constituent settlement within Borough. The assessment above demonstrates clearly that the Council consider the development of the site to be sustainable and in accordance with the objectives of the WLP. However, it seems that a subjective view of the merits of the sites at Warrington Road (in Green Belt and sustainable transport terms) have resulted in allocations which entirely match the housing requirement for Culcheth of 200 homes.
- 5.39 Indeed, the Sustainability Appraisal considers that the Land at Warrington Road (Site ID 3157) 'Promotes Sustainable Growth' and achieves a green rating for just six categories (one less than Land west of Culcheth), being assessed as less well served by bus services. Furthermore, the Land at Lion's Den (Site ID: 3337) also achieves a green rating for just six categories, scoring lower for access to formal play space. Therefore, the Land West of Culcheth 'promotes sustainable growth' more, as assessed by the Sustainability Appraisal, than the sites which make up the allocated Land east of Culcheth. Therefore, this evidence suggests that Land West of Culcheth is more sustainable than the allocated site.
- 5.40 In addition, the Land at Lion's Den also scores red for 'Use of Previously Developed Land'. Land at Warrington Road unusually scores green for accessibility to a train station, despite the nearest train station being located in Glazebury, with all other sites in Culcheth categorised as amber ('mitigation may be required/ unavoidable impacts). This clearly demonstrates the subjective nature of site assessment and ability for human error. Land at Warrington Road should score amber, as Land at Lion's Den (the adjacent site) also does, for category ACC4 (How accessible is the site to train station).



- 5.41 Furthermore, the assessment of category NR3 'Loss of High Quality Agricultural Land' is inconsistent. Land west of Culcheth scores 'amber' whereas the sites making up the allocation Land east of Culcheth scores 'light green'. This is despite the fact that all land surrounding Culcheth is designated as Grade 3 (Good to moderate) agricultural land. Therefore, there is no evidence provided as to why Land west of Culcheth scores amber, which should be amended to a 'light green' for consistency.
- 5.42 The Land east of Culcheth is detached from the existing built up area and is not enclosed with clear boundaries, as the Land west of Culcheth is with the Linear Park running along the Southern boundary. Redrow as a national PLC house builder are capable of delivering the site at an early stage – ensuring that the allocation delivers towards Warrington's housing requirements early in the plan period.
- 5.43 Redrow's analysis above has demonstrated that Land west of Culcheth is the most sustainable site in Culcheth and should be allocated for residential development. Nevertheless, should the housing distribution figure increase in Culcheth, as Redrow has demonstrated it should, or in the worst case scenario that additional land be required to be safeguarded beyond the Plan period, Land west of Culcheth has been identified as the most suitable alternative, taking other submitted sites in to consideration.
- 5.44 Redrow does not agree with the conclusions reached in respect of the Land west of Culcheth, compared to the site allocated at Warrington Road, in both Green Belt terms and promoting sustainable means of transport. Both issues are now considered individually.

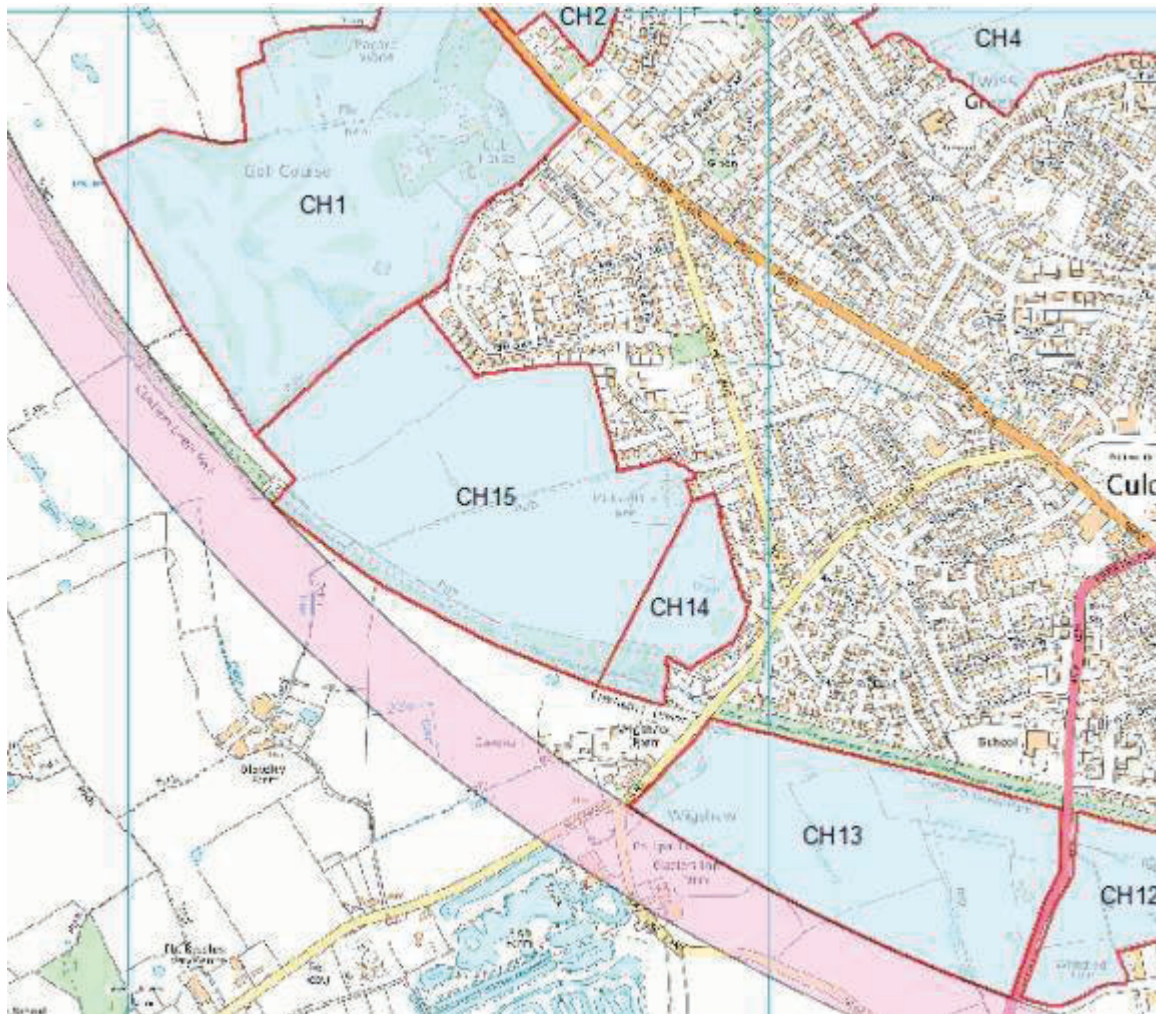
### *Green Belt*

- 5.45 The Land west of Culcheth was re-assessed by virtue of a ***Green Belt Assessment Addendum following Regulation 18 consultation*** (ARUP, June 2017) following the confirmation of the HS2 Safeguarded route. Land West of Culcheth comprises parcels CH14 and CH15. Parcel CH14 was originally assessed<sup>4</sup> as having a 'weak' contribution towards the green belt purposes and CH15 was assessed to have a 'strong contribution'. Following the re-assessment of parcel CH15 in 2018, the parcel's assessment was revised to a 'moderate contribution'. **Figure 3** below demonstrates the Green Belt Assessment parcel boundaries.

---

<sup>4</sup> Green Belt Assessment Final Report (ARUP, 21 October 2016)

Figure 3: Extract from Green Belt Assessment Addendum following Regulation 18 Consultation (ARUP, June 2017).



5.46 Table 12 below is a summary of Arup’s findings and Redrow’s Green Belt Assessment comments upon Arup’s findings, specifically in relation to the Land West of Culcheth.

Table 12: Land West of Culcheth Green Belt Assessment critique

Arup Green Belt Assessment (October 2016) Parcel CH14	Arup Green Belt Assessment (Addendum following Regulation 18 Consultation) June 2017 Parcel CH15	Redrow Assessment Land west of Culcheth
<b>Purpose 1 – to check the unrestricted sprawl of large built-up areas</b>		
No contribution: The parcel is not adjacent to the Warrington urban area and therefore does not contribute to this purpose	No contribution: The parcel is not adjacent to the Warrington urban area and therefore does not contribute to this purpose	Redrow agree with this assessment.
<b>Purpose 2 - To prevent neighbouring towns merging into one another</b>		

<p>No contribution: The parcel does not contribute to preventing towns from merging</p>	<p>No contribution: The parcel does not contribute to preventing towns from merging.</p>	<p>Redrow agree with this assessment.</p>
<p><b>Purpose 3 - To assist in safeguarding the countryside from encroachment</b></p>		
<p>Moderate contribution: The boundary between the parcel and the settlement is non-durable. The northern and eastern boundaries link the parcel to the settlement and these consist of the rear gardens of residential properties with an intermittent tree line. These boundaries could not prevent encroachment into the parcel in the long term. The boundaries between the parcel and the countryside are more durable. To the south is a Culcheth Linear park and to the west is a dense tree line. These are more natural features but the southern boundary could prevent encroachment beyond the parcel if the parcel were developed, whereas the western boundary may not. The existing land use is agricultural. The parcel is connected to the countryside along the west ern and southern boundaries. The parcel is flat, with no built form however there is dense vegetation which prevents open long line views and thus the parcel supports a moderate degree of openness. Overall, the parcel makes a moderate contribution to safeguarding from encroachment</p>	<p>Strong contribution: The parcel only links to the settlement along the northern boundary. The boundary between the parcel and the settlement is non-durable and consists of the garden boundaries. This boundary could not prevent encroachment into the parcel in the long term. The boundaries between the parcel and the countryside are mixed. The southern boundary is Culcheth Linear Park which is a durable boundary. Beyond the southern boundary is the safeguarded HS2 Phase 2b route which represents a further durable boundary. The eastern boundary is a dense tree line and the western boundary consists of a path that is bordered by dense tree line, these boundaries are not durable and may not be able to prevent encroachment beyond the parcel if the parcel were developed. The existing land use is open countryside. The parcel is well connected to the countryside along three boundaries. The parcel is flat, with no built form and there is dense vegetation but open long line views are still present and thus the parcel supports a strong-moderate degree of openness. Overall, the parcel makes a strong contribution to safeguarding from encroachment.</p>	<p>Weak - Moderate Contribution: There is a sense of urban encroachment on the site as a result of the urban development that surrounds the northern and eastern boundaries of the site, which has an impact on how the site is viewed. As outlined in Appendix A to this representation, the proposals seek to strengthen the tree belt along the northern boundary of the site, which will result in a more durable boundary and provide a suitable transition to the Local Wildlife Site (LWS). The LWS prevents further encroachment to the north. This will therefore create durable boundaries to the whole site, preventing any future encroachment to the countryside. The site has limited visual connections to the wider Green Belt area due to the dense tree belts surrounding the site and existing residential areas, which renders the site less open than other areas surrounding Culcheth (a weak degree of openness). The development of HS2 will further provide a durable boundary and will provide an urbanising influence.</p>
<p><b>Purpose 4 - To preserve the setting and special character of historic towns</b></p>		
<p>No contribution: The parcel is not adjacent to a historic town. The parcel does not cross an important viewpoint of the Parish Church.</p>	<p>No contribution: The parcel is not adjacent to a historic town. The parcel does not cross an important viewpoint of the Parish Church.</p>	<p>Redrow agree with this assessment.</p>
<p><b>Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land</b></p>		

<p>Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.</p>	<p>Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.</p>	<p>Not applicable: Green Belt has the potential to make a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites. It is difficult to distinguish the extent to which each Green Belt parcels delivers against this purpose and therefore it is Redrow's view that the study should not undertake an assessment of this purpose.</p>
<p><b>Justification for Assessment</b></p>		
<p>The parcel makes a moderate contribution to two purposes, and no contribution to three purposes. In line with the methodology, the parcel has been judged to make a weak overall contribution. The parcel supports a moderate degree of openness and has strong boundaries between the parcel and the countryside. The parcel makes a moderate contribution to encouraging urban regeneration. The parcel does not contribute to checking unrestricted sprawl, preventing towns from merging or from preserving the setting of historic towns.</p>	<p>The parcel makes a strong contribution to one purpose, a moderate contribution to one purpose, and no contribution to three purposes. In line with the methodology, professional judgement has been applied to evaluate the overall contribution. The parcel has been judged to make a moderate overall contribution. The parcel has a strong-moderate degree of openness, and there are some non-durable boundaries between the parcel and the countryside however the safeguarded HS2 Phase 2b route passes close to the south and west of the parcel. This durable boundary could contain development and prevent it from threatening the overall openness and permanence of the Green Belt. The parcel makes a moderate contribution to encouraging urban regeneration.</p>	<p>The site makes a weak-moderate contribution to one purpose and no contribution to three purposes. Overall therefore, Redrow consider that the parcel makes a weak-moderate contribution towards the purposes of the green belt. The site demonstrates a weak degree of openness, which will be reduced with the introduction of HS2.</p>
<p><b>Overall Assessment</b></p>		
<p>Weak contribution</p>	<p>Moderate Contribution</p>	<p>Weak – Moderate Contribution</p>

5.47 As outlined in Redrow's 2019 representation to the WLP and in the table above, we consider that no long distance views are available from either within or outside of the site and so any sense of a contribution towards openness is completely compromised by the existing residential development and the dense tree

cover that follows the route of the Culcheth Linear Park, which is identified as a durable boundary in the 2016 Green Belt Assessment (assessment of Parcel CH15).

- 5.48 Overall, Redrow consider that the site makes a weak-moderate contribution towards the purposes of the Green Belt, which differs from the Council's assessment undertaken by Arup. Importantly, Redrow's assessment considers the site as a whole and the associated proposals, rather than two separate parcels which has produced a different subjective view.
- 5.49 Redrow consider that the Warrington Road site exhibits far greater characteristics of openness (a 'strong degree of openness' as judged in the 2016 Green Belt Assessment (GBA)). In fact, the eastern and southern boundaries do not prevent further encroachment into the countryside (which is a conclusion shared by the 2016 GBA). Despite making a moderate contribution to two purposes, a weak contribution to one purpose and no contribution to two purposes, the site is concluded to make only a weak contribution to the Green Belt which does not seem like a consistent assessment.
- 5.50 Table 13 below is a summary of Arup's findings and Redrow's Green Belt Assessment comments upon Arup's findings, specifically in relation to the Land east of Culcheth (the Warrington Road site).

Table 13: Land East of Culcheth Green Belt Assessment critique

Arup Green Belt Assessment (October 2016) Parcel CH9	Redrow Assessment Land east of Culcheth
<b>Purpose 1 – to check the unrestricted sprawl of large built up areas</b>	
No contribution: The parcel is not adjacent to the Warrington urban area and therefore does not contribute to this purpose	Redrow agree with this assessment.
<b>Purpose 2 - To prevent neighbouring towns merging into one another</b>	
Weak contribution: The parcel forms a less essential gap between the Warrington urban area, Culcheth and Leigh which falls within the administrative authority of Wigan. Development of the parcel would result in the actual gap being slightly reduced although would not result in the towns merging. Overall, the parcel makes a weak contribution to preventing towns from merging.	Redrow agree with this assessment.
<b>Purpose 3 - To assist in safeguarding the countryside from encroachment</b>	
Moderate contribution: The boundaries between the parcel and the settlement are varied. To the west is the A574, which is a durable boundary that could prevent encroachment into the parcel in the long term. However the southern boundary is a hedge line with	Strong contribution: The parcel benefits from two durable boundaries (Warrington Road and Holcroft Road). However, the eastern boundary consists of a hedge line with some trees which would not prevent encroachment further in to the

<p>trees which could not prevent encroachment into the parcel in the long term. The eastern boundary links the parcel and the countryside and consists of a hedge line with intermittent trees which would not prevent encroachment beyond the parcel if the parcel were developed however to the north is the B5212 which is a durable boundary that could prevent encroachment beyond the parcel if the parcel were developed. The existing land use is predominantly open countryside with a cattery located within the parcel. The parcel is reasonably well connected to the countryside as has links on two boundaries. The parcel is flat with minimal built form and no vegetation and there are open long line views thus it supports a strong degree of openness. Overall, the parcel makes a moderate contribution to safeguarding from encroachment</p>	<p>countryside should the parcel be developed. The site is separated from the main area of Culcheth by Shaw Street Recreation Ground, which when traveling northwards along Warrington Road signals the start of the countryside. In addition, there are long distance views between the site and the surrounding Green Belt. Therefore, the site demonstrates a strong degree of openness. Overall, Redrow consider the site makes a strong contribution to safeguarding the countryside from encroachment.</p>
<p><b>Purpose 4 - To preserve the setting and special character of historic towns</b></p>	
<p>No contribution: The parcel is not adjacent to a historic town. The parcel does not cross an important viewpoint of the Parish Church.</p>	<p>Redrow agree with this assessment.</p>
<p><b>Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land</b></p>	
<p>Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.</p>	<p>Not applicable: Green Belt has the potential to make a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites. It is difficult to distinguish the extent to which each Green Belt parcels delivers against this purpose and therefore it is Redrow's view that the study should not undertake an assessment of this purpose.</p>
<p><b>Justification for Assessment</b></p>	
<p>The parcel makes a moderate contribution to two purposes, a weak contribution to one purpose, and no contribution to two purposes. In line with the methodology, the parcel has been judged to make a weak overall contribution. Whilst the parcel supports a strong degree of openness and has both durable and nondurable boundaries. The parcel makes a weak contribution to preventing towns from merging and a moderate contribution to encouraging urban regeneration. The parcel does not contribute to checking unrestricted sprawl or preserving the setting of historic towns.</p>	<p>Redrow consider that the parcel makes a strong contribution to one purpose, a weak contribution to one purpose and no contribution to two purposes. The parcel also demonstrates a strong degree of openness and does not benefit from durable boundaries.</p>
<p><b>Overall Assessment</b></p>	
<p>Weak contribution</p>	<p>Moderate-strong contribution</p>

- 5.51 Overall, Redrow consider that the site makes a moderate-strong contribution towards the purposes of the Green Belt, which differs from the Council's assessment undertaken by Arup. Redrow consider that the site in fact makes a strong contribution to protecting the countryside from encroachment and Redrow's assessment results in an overall conclusion that the Land east of Culcheth makes a moderate-strong contribution to the Green Belt.
- 5.52 Redrow's firm view remains that the land West of Culcheth makes far less of a contribution towards the purposes of including land within the Green Belt than the allocated Warrington Road site, especially since it is the most logical location to adjust Green Belt boundaries in Culcheth, infilling the land between existing residential areas and the durable boundary of Culcheth linear park. Therefore, Redrow consider that Land west of Culcheth is more suitable for release from the Green Belt than the allocated Land east of Culcheth.

*Promoting sustainable modes of transport*

- 5.53 It is difficult to ascertain why the land allocated at Warrington Road was considered in the workshops to contribute to WLP objective of the promotion of sustainable modes of transport more than the Land West of Culcheth. The West of Culcheth site is slightly closer to the neighbourhood centre of Culcheth (650m) compared to 850m from the Warrington Road site. The neighbourhood centre contains the accessible shops, services and facilities which make Culcheth such a sustainable place to live.
- 5.54 It may be that because the Warrington Road site lies opposite Culcheth High School and Culcheth Community Primary School, this scores the site more highly than the West of Culcheth site. Nevertheless, the High School is still only approximately 1.6km from the West of Culcheth site, which is still considered an accessible distance. Newchurch Community Primary School is located within 0.5km of the West of Culcheth site.
- 5.55 Reference is made within the workshop comments that sections of Wigshaw Lane only has a footpath on one side and this is somehow seen to score against the West of Culcheth site in sustainability terms. What hasn't been acknowledged is that there is a continuous footpath along the entire eastern extent of Wigshaw Lane and that crossing points (with dropped kerbs) are provided at the roundabout junction of Wigshaw Lane with Pendle Gardens and Swinhoe Place, thus providing a safe, convenient and continuous footpath route in to the centre of Culcheth from the site.

- 5.56 The distance to train stations should be a similar issue for both sites, however as highlighted, the Land West of Culcheth is assessed in the *Sustainability Appraisal* to be 'amber' where as the Land at Warrington Road is assessed to be 'green', despite not being geographically closer to neither Birchwood nor Glazebury train stations. It may be that the Warrington Road site may be scored higher due to its location adjacent to the 28 bus route (to Birchwood), which lies almost opposite the entrance to Culcheth Community Primary School. However, it is a short walk from the Land west of Culcheth site to the Chatburn Close bus stop on Warrington Road, at which the 28 bus also stops. Buses also run in to both Leigh and Warrington from the Wigshaw Road bus stop. Therefore, it is hard to see how the Land at Warrington Road scores more highly than the Land West of Culcheth in sustainable transport terms.
- 5.57 The analysis above has clearly demonstrated that the Land west of Culcheth is the most sustainable location for development in Culcheth and is in particular more sustainable than the allocated site (Land to the east of Culcheth). Regardless of this, it is clear that given the amount of housing that should be delivered in Culcheth across the Plan period and beyond, to ensure the durability of Green Belt boundaries, both sites should be allocated for residential development to ensure that local housing and infrastructure needs are met.

## Summary

- 5.58 It has been established within this representation that it is necessary to identify new Housing Allocations within the Green Belt as a result of the significantly overly-optimistic and unjustified housing land supply position being used to underpin the housing strategy for Warrington.
- 5.59 This representation, in addition to Redrow's response to the 2019 Draft WLP and the Masterplan and Development Report included as Appendix A provides sufficient evidence, in our view, that justifies the Land West of Culcheth as a housing allocation in the WLP or, at the very least, land removed from the green belt and safeguarded for future development should Warrington not be able to demonstrate a five year housing land supply.
- 5.60 Redrow can confirm that the site is capable of delivering around **350-450 family homes** (including affordable housing) in Culcheth, helping to ensure that the WLP housing strategy meets housing needs in full and achieves an appropriate distribution of growth around the District of the type, size and mix required to meet the identified needs.



5.61 The evidence base supporting the WLP, including the Sustainability Assessment, Settlement Profiles, Development Options and Site Assessment Technical Report and Green Belt Assessments have clearly considered the Land West of Culcheth to be a suitable and sustainable location for housing in respect of the WLP objectives. Therefore, the site should be identified as a Housing Allocation, or at the very least a safeguarded site which is removed from the Green Belt and is brought forward for development should the WLP strategy, focusing on Warrington's existing urban area, fail to deliver the housing requirement as envisaged.

## 6. Suggested Site Allocation: Land south of Glazebrook Train Station

- 6.1 As the analysis in Section 4 of this representation outlines, Redrow consider that additional land needs to be identified for release from the Green Belt if Warrington's housing needs are to be met in full. It is in this context that Redrow are also promoting land south of Glazebrook Train Station as a suitable site for residential development. The Call for Sites reference and description is R18/P2/021 Land west of Glazebrook Lane & Bank Street.
- 6.2 A detailed Masterplan and Development report, produced by Cass Associates (August 2018) is included at Appendix B to this representation. The Masterplan and Development report has previously been submitted to the Council and accompanied Redrow's representations at the Proposed Submission stage of the Warrington Local Plan (WLP) in June 2019.
- 6.3 The report confirms that the site is available, suitable and achievable with a realistic prospect that housing will be delivered on the site within five years. It could therefore be considered 'deliverable' in accordance with the definition provided at Annex 2 of the National Planning Policy Framework (NPPF, 2021), should the site be allocated for residential development. The site is being promoted by Redrow, a major volume housebuilder with a proven track record of delivering high quality housing developments across the North West.
- 6.4 Section 4 of this representation confirms the significant issues relating to Warrington's existing sources of housing land supply, which will require Warrington to identify additional sites within the Green Belt to make up the shortfall of approximately 5,318 dwellings (subject to clarification of the Town centre breakdown). This site is considered capable of delivering around 600-700 family homes, which will make a significant contribution towards meeting the identified shortfall.
- 6.5 The following section will provide justification to direct additional housing growth towards Glazebrook.

### Justification to identify a new Housing Allocation in Glazebrook

- 6.6 The WLP sets out the exceptional circumstances that exist to justify the release of Green Belt land to meet housing needs and Redrow support the conclusion that has been reached. The WLP does not however seek to distribute any housing towards Glazebrook as part of the overall housing strategy.

Redrow's view is that this represents a missed opportunity to achieve a truly sustainable pattern of growth, centred around Glazebrook train station which lies on the route of the Manchester Oxford Road to Liverpool Lime Street via Warrington Central service. In addition, the WLP only considers Glazebrook as an outlying settlement in isolation and so completely ignores the relationship with the nearby settlements of Cadishead and Irlam to the east in neighbouring Salford.

#### *National and Local Planning Policy Sustainability Objectives*

- 6.7 The land being promoted by Redrow represents a unique opportunity to deliver housing in a sustainable manner that is entirely aligned with recent national planning policy objectives and industry research. The opportunity and crucial role that key transport nodes, particularly train stations, play in meeting sustainability objectives has not been missed by other neighbouring authorities. For example, a local and relevant example is reflected within the Draft Places for Everyone DPD, which identifies 'North of Irlam Station' as a housing allocation under Policy JP Allocation 28 with a capacity of 800 dwellings.
- 6.8 The following extract is taken from paragraph 11.254 of the 2021 PfE DPD and is the primary justification for identifying the site as a Housing Allocation:

*'The site has been identified as being appropriate for development due to its location next to Irlam rail station, with services that provide easy access to the huge range of employment and leisure opportunities in the City Centre and Trafford Park.'*

- 6.9 Exactly the same principle applies to the land surrounding Glazebrook and the important role that the train station plays has already been recognised by Warrington when preparing previous versions of their development plan. The Masterplan and Development Report at Appendix C confirms that around 42 hectares of land to the south of Glazebrook Station was proposed to be Safeguarded for future development in the Deposit Draft of the Warrington Borough Local Plan produced in 1994. Given the significant scale of the land in question this was quite clearly a decision based upon the potential for the train station to support a sustainable pattern of growth in the future rather than Glazebrook's position in the settlement hierarchy for Warrington. Ultimately the plan was not adopted as Warrington became a unitary authority prior to receiving the Inspector's report in 1998 and so work on the plan was halted in June 1999. The intended policy to safeguard this land was not then carried forward simply because the new tier of regional planning guidance in the form of the Regional Spatial Strategy for the North west

(RPG13) sought to direct growth towards the Regional centres of Liverpool and Manchester/Salford and as such there was no longer a requirement to carry out a review of the Green Belt in Warrington.

6.10 The NPPF sets out a number of considerations at Paragraph 73 for planning for larger scale development, provided this is well located and designed and supported by the necessary infrastructure and facilities. The relevant considerations are:

*a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*

*b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*

*c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;*

*d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)<sup>37</sup>; and*

*e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.*

6.11 Redrow consider that development on land south of Glazebrook train station clearly meets the expectations and considerations of NPPF Paragraph 74. Opportunities are created by planned infrastructure improvements nearby in Salford and the sustainability of the site due to its presence on the train line is demonstrates the area's economic potential. The site is also sufficiently large to maximise the possibility of achieving net environmental gains. Redrow's strong track record of delivering sustainable large scale strategic projects of a high quality design, accompanied by the necessary infrastructure is a clear sign

that the development of land south of Glazebrook train station by Redrow would meet the requirements of NPPF Paragraph 74.

- 6.12 The role of key transport nodes as a focus for sustainable development cannot be understated and is adopted as an approach across the country. Indeed paragraph 105 of the NPPF states “significant development should be focused on locations which are or can be made sustainable...”. Numerous research papers have also been produced over the years that advocate the crucial role that train stations play in facilitating sustainable modes of travel and the distinct advantages that exist to locate new housing and development around them and this has manifested itself in the NPPF objectives outlined above. The connectivity between the site and the employment centres within Warrington, due to the train station providing a suitable commuting opportunity, will support Warrington’s economic growth aspirations.
- 6.13 The principle of identifying land south of Glazebrook Train Station for residential development is therefore supported by national, regional and local planning policy.

#### **A Deliverable Site -Further justification to identify land south of Glazebrook Train Station as a new Housing Allocation**

- 6.14 Redrow can confirm that the site is available, suitable and achievable with a realistic prospect that housing can be delivered on site within 5 years. Therefore, the site can be considered ‘deliverable’ in line with the definition contained within Annex 2 of the National Planning Policy Framework (NPPF, 2021).

#### **Available**

- 6.15 The site is available for development and this representation confirms there are no known barriers to prevent the site from being delivered immediately, with housing completions achieved within 5 years (subject to the necessary planning permission).
- 6.16 Redrow, as a national PLC housebuilder with an excellent track record of delivery, are capable of delivering the site at an early stage, ensuring that the allocation delivers towards Warrington’s housing requirements at an early stage in the Plan period.

### *Suitable*

- 6.17 The site is a suitable location for development and would contribute towards the creation of a sustainable new community in Glazebrook. As outlined below, the site is of a scale that new local provision of retail, community and commercial uses could be supported by the new development and new residents could support the vitality of existing services within Glazebrook.
- 6.18 The site is located just 500m from Cadishead and the Glazebrook train station provides a link directly to the wide range of shops and services available in both Irlam and Warrington. St Mary's CE Primary School in Cadishead is just 700m from the site and other shops and services such as takeaways, public houses and convenience stores are located within Cadishead. The train station provides regular services to Warrington, Liverpool and Manchester, which will give residents opportunities for commuting into employment centres plus a vast range of shopping, employment and leisure opportunities. This is therefore a highly sustainable and suitable location for new residential development to help meet locally identified needs for housing in Warrington Borough.
- 6.19 The site is a suitable location for development and is an exciting opportunity to create a new sustainable community centred around connectivity to the central hub of Glazebrook train station, making the most efficient use of existing infrastructure.

### *Achievable*

- 6.20 Redrow confirms that the development of the site is achievable as there is a reasonable prospect that housing can be delivered within the first five years of the Plan period. There are no known technical or physical constraints that would prevent the delivery of housing

### **Additional social and economic benefits associated with the development of land South of Glazebrook Train Station**

- 6.21 As outlined above, the Masterplan and Development Report, provided at Appendix B gives a detailed justification of the Site's inclusion as a housing allocation and should be referred to for further information.
- 6.22 The Development Options and Site Assessment Technical Report sets out the Council's rationale behind the selection of sites when considered against WLP objectives. However, it is of concern that this site,

which has been submitted through the Call for Sites exercise has simply not been considered as part of this process and so the reasons for discounting the site are unknown.

- 6.23 A development of 600 to 700 homes can be justified in this location as a result of the presence of Glazebrook Train Station and the site is also of a critical scale, which will assist in either the delivery of new infrastructure or supporting improvements to existing provision. The site is also of a sufficient size to accommodate a substantial amount of the housing supply shortfall that has been identified elsewhere in this representation.

### *Delivering new infrastructure*

#### Park & Ride Facility

- 6.24 The Warrington Multi Modal Transport Model confirms that the number of people using Glazebrook train station is lower than any of the other six railway stations in Warrington. The proposals make allowance for a Park and Ride facility at the site with a capacity for 200 car parking spaces. This is therefore delivering a key piece of infrastructure that will actively encourage the use of sustainable transport modes and boost the use of the rail services available at Glazebrook in line with NPPF and WLP objectives.

#### Community and Commercial Uses

- 6.25 The site is of a sufficient scale to justify the provision of new local scale retail provision and other small-scale commercial and community uses to help meet day to day needs, playing a supporting role to the facilities that already exist in Glazebrook Village local centre. The new residents will therefore not only benefit from access to the new uses to be integrated into the scheme, but they will also help to support the future viability of existing services in Glazebrook itself.

### Summary

- 6.26 The site is available, suitable and achievable with a realistic prospect that housing will be delivered on the site within five years and represents a unique opportunity to deliver a truly sustainable development. The site is therefore 'deliverable' in accordance with the definition in Annex 2 of the NPPF (2021) and is being promoted by a major housebuilder with a proven track record of housing deliver in the northwest.
- 6.27 The development is centred around Glazebrook Train Station, which will provide residents with direct access to the wide range of employment, shopping, leisure and cultural opportunities available in

Manchester, Liverpool, Warrington and Trafford Park. The development also offers the opportunity to significantly enhance the use of Glazebrook Train Station through the provision of a Park and Ride Facility, promoting sustainable methods of travel.

- 6.28 Redrow can confirm that the site is capable of delivering around 600-700 family homes (including affordable housing) in Glazebrook, helping to ensure that the WLP housing strategy meets housing needs in full and achieves an appropriate distribution of growth around the District of the type, size and mix required to meet the identified needs. Small scale commercial and community uses can also be integrated into the scheme and the inter-relationship with neighbouring Cadishead and Irlam further enhances the sustainability credentials of the site.
- 6.29 The Masterplan and Development Report provided at Appendix B provides a significant level of detail with regards to future development proposals for the site.



## 7. Suggested Site Allocation: Land at Warrington Road, east of Culcheth, Warrington

- 7.1 As outlined in the analysis contained in Section # of this representation, Redrow consider that additional land needs to be identified for release from the Green Belt if Warrington's housing needs are to be met in full. It is within this context that Redrow are promoting Land at Warrington Road as a suitable site for residential development. The site extends to 2.83 hectares, has the capacity to accommodate circa 70 homes and has previously been submitted to a Call for Sites submission by Redrow.
- 7.2 The title plan of the site accompanies these representations at Appendix C.

### Justification to identify Land at Warrington Road as a new Housing Allocation

- 7.3 Sections 4 of this representation confirm the significant issues relating to Warrington's existing sources of housing land supply, which will require Warrington to identify additional sites within the Green Belt to make up the shortfall of approximately **5,318** dwellings (subject to clarification of the Town centre breakdown).
- 7.4 Section 6 provides a justification for a greater proportion of housing growth to be directed to Culcheth as a sustainable settlement and estimates that a housing distribution figure of approximately 600-700 homes is entirely appropriate. Culcheth Village is categorised as a 'neighbourhood centre' in draft Policy DEV5 and contains a wide range of shops, services and infrastructure which is capable of supporting an uplifted housing distribution figure.
- 7.5 It is within this context that the land at Warrington Road is promoted by Redrow.

### A Deliverable Site

- 7.6 Redrow can confirm that the site is available, suitable and achievable with a realistic prospect that housing can be delivered on site within 5 years. Therefore, the site can be considered 'deliverable' in line with the definition contained within Annex 2 of the National Planning Policy Framework (NPPF, 2021).

### *Available*

- 7.7 The site is available for development and this representation confirms there are no known barriers to prevent the site from being delivered immediately, with housing completions achieved within 5 years (subject to the necessary planning permission).
- 7.8 Redrow, as a national PLC housebuilder with an excellent track record of delivery, are capable of delivering the site at an early stage, ensuring that the allocation delivers towards Warrington's housing requirements at an early stage in the Plan period.

### *Suitable*

- 7.9 The site is a suitable location for development and would contribute towards the creation of a sustainable community in Culcheth.
- 7.10 The site is located 2km from the centre of Culcheth and just 1km from Culcheth High School and so a wide range of shops and services are located within an accessible distance of the site. Bus stops are located adjacent to the site providing regular daily services between Warrington and Leigh, which will give residents access to a wider range of shopping, employment and leisure opportunities. This is therefore a highly sustainable and suitable location for new residential development to help meet locally identified needs for housing in Culcheth and Warrington as a whole.
- 7.11 From a Green Belt perspective, the site is already heavily influenced by the context of the surrounding residential development, with Hawthorn Avenue located to the immediate east, the recently constructed Culcheth Green site to the west and the properties along Fowley Common Lane to the north. The southern boundary is heavily vegetated and so this has the effect of significantly reducing the openness of this particular parcel of land and through enhancement will provide a natural and defensible barrier between the site and the open countryside.
- 7.12 The site is within a highly sustainable location and is only be considered to make a weak contribution towards the five purposes of including land within the Green Belt set out at paragraph 138 of the Framework and so can be considered appropriate for release for development. This is a therefore suitable location for new housing.

### *Achievable*

- 7.13 Redrow confirms that the development of the site is achievable as there is a reasonable prospect that housing can be delivered within the first five years of the Plan period. There are no known technical or physical constraints that would prevent the delivery of housing.

## 8. Summary and Conclusion

- 8.1 This representation sets out the concerns that Redrow has with elements of the Updated Proposed Submission Version of the Warrington Local Plan.

### Housing Requirement

- 8.2 Redrow are of the view that the housing requirement of 14,688, or 816 dwellings per annum (which proposes no uplift to the standard methodology figure) is a suppressed housing requirement given the significant economic growth and job creation aspirations for Warrington, which is located in a key strategic position in the North West and so a significant uplift can easily be justified.
- 8.3 Redrow also consider that the flexibility figure of 10% that has been applied to the housing requirement should be increased to 20% in line with the presumption in favour of sustainable development given the continued absence of a five year housing land supply and the 2020 Housing Delivery Test measurement of 57%.
- 8.4 It is also considered that the housing requirement has not been uplifted to a significant enough degree to meet identified affordable housing needs in full and the skewed distribution towards Town Centre sites which are known to face significant viability issues further exacerbates the situation.

### Concerns related to the Housing Land Supply Position

- 8.5 Redrow have some fundamental concerns with regards to how the overall housing requirement is proposed to be met. The primary area of concern is the anticipated yield of housing that is being claimed to be delivered within the existing urban areas (and particularly within Warrington Town Centre).
- 8.6 This is particularly important in Warrington because the Council acknowledge that despite the anticipated yield of housing coming forward from the urban area, exceptional circumstances still exist to require the release of land from the Green Belt to meet future housing needs. Warrington can currently only demonstrate a 3.4 years housing land supply and has a 2020 Housing Delivery Test measurement of 57% further confirm the concerns Redrow has.

- 8.7 Should this source of housing land supply fail to deliver the anticipated yield, the Local Plan will not be able to provide the necessary flexibility to respond to change over time as more land would be required to be released from the Green Belt through a further Local Plan review, which is contrary the presumption in favour of sustainable development at paragraph 11 of the NPPF.
- 8.8 This is therefore a matter that goes to the heart of the soundness of the Plan.
- 8.9 Redrow also has concerns regarding the identification of Fiddler's Ferry as a housing site being capable of delivering 1,310 homes at a late stage of the plan preparation process. There is insufficient technical evidence provided to demonstrate that development of the site is viable and achievable. Stage 1 of the Green Belt Assessment concludes that the northern parcel of land proposed to accommodate some of the new housing makes 'Strong Contribution' towards the purposes of including land within the Green Belt. Identifying this site as a Housing Allocation is contrary to the approach taken elsewhere and cannot be justified.

#### The need to identify Safeguarded Land

- 8.10 Given the significant concerns Redrow has in respect of the existing claimed sources of housing land supply, Redrow are of the view that the identification of additional areas of safeguarded land is essential (in line with paragraph 143 of the NPPF) and the failure of the WLP to identify any safeguarded land does not provide any flexibility to meet future development needs, which goes to the heart of the soundness of the Plan.
- 8.11 A trigger mechanism based upon actual rates of delivery should be incorporated in respect of future Local Plan reviews, which is an approach recommended at paragraph 33 of the NPPF. This would enable safeguarded land to come forward for development earlier in the plan period should the housing trajectory currently anticipated in the WLP fail to deliver the required level of housing. Policy M1 'Local Plan Monitoring and Review' is the mechanism to achieve this, along with the presumption in favour of sustainable development set out in the NPPF.

## Suggested New Site Allocations

8.12 Redrow are promoting three sustainable sites for residential development within the context of this representation, which would go some way towards making up the considerable shortfall that currently exists (and will continue to exist) in Warrington. Redrow are a major housebuilder with a proven track record of housing delivery in the North West and so can confirm that these sites are available, suitable and achievable and therefore deliverable.

### *Land west of Culcheth*

8.13 The Masterplan and Development Report provided at Appendix A provides a detailed justification of the Site's inclusion as a Housing Allocation and should be referred to in this regard. The site is capable of delivering c. 350 to 450 homes.

8.14 The evidence base supporting the WLP, including the Sustainability Assessment, Settlement Profiles, Development Options and Site Assessment Technical Report and Green Belt Assessments have clearly considered the Land West of Culcheth to be a suitable and sustainable location for housing in respect of the WLP objectives.

8.15 This site should be released from the Green Belt and identified as a Housing Allocation, or at the very least safeguarded land on the basis that the WLP strategy, which focuses on Warrington's existing urban area and Town Centre sites in particular, will fail to deliver housing needs (both market and affordable) in full during the plan period.

### *Land south of Glazebrook Train Station*

8.16 The site is available, suitable and achievable with a realistic prospect that housing will be delivered on the site within five years and represents a unique opportunity to deliver a truly sustainable development. The site is therefore 'deliverable' in accordance with the definition in Annex 2 of the NPPF (2021).

8.17 The development is centred around Glazebrook Train Station, which will provide residents with direct access to the wide range of employment, shopping, leisure and cultural opportunities available in Manchester, Liverpool, Warrington and Trafford Park. The development also offers the opportunity to

significantly enhance the use of Glazebrook Train Station through the provision of a Park and Ride Facility, promoting sustainable methods of travel.

- 8.18 Redrow can confirm that the site is capable of delivering around 600-700 family homes (including affordable housing) in Glazebrook, helping to ensure that the WLP housing strategy meets housing needs in full and achieves an appropriate distribution of growth around the District of the type, size and mix required to meet the identified needs. Small scale commercial and community uses can also be integrated into the scheme and the inter-relationship with neighbouring Cadishead and Irlam further enhances the sustainability credentials of the site.
- 8.19 The Masterplan and Development Report provided at Appendix B provides a significant level of detail with regards to future development proposals for the site.

*Land at Warrington Road, east of Culcheth*

- 8.20 Redrow consider that a much higher level of housing growth in Culcheth (650-750 dwellings) is entirely justified given the size of the settlement (third largest in the borough), the wide range of shops and services available (the settlement has the infrastructure capacity to accommodate more housing) and the need for the outlying settlements to make up the considerable shortfall that exists in relation to existing sources of housing land supply.
- 8.21 Within this context, Redrow can confirm that this site is deliverable and has the capacity to accommodate c. 70 homes. The title plan of the land in question is provided at Appendix C of this representation and the site is deliverable in accordance with the definition provided at Annex 2 of the NPPF .

## Appendix A

### Masterplan and Development Report for Land West of Culcheth



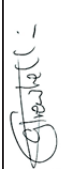



**Land West of Culcheth,  
Warrington**

Masterplan and Development Report  
September 2018

# Contents

1	Introduction
2	The Site and it's Context
3	Planning Policy Context
4	The Proposed Development
5	Accessibility and Sustainability
6	The Green Belt
7	Green Belt
8	The Planning Balance
<b>Figures</b>	
1	Context Plan: Aerial Photograph
2	Context Plan: Ordnance Survey Base
3	Panoramic Photographs
4	Site Analysis
5	Historic Plans
6	Extract From Warrington Borough Local Plan Deposit Draft 1994
7	Development Masterplan
8	Kirknall Hall Layout
9	Context, Connectivity, Services and Facilities
10	Routes to Local Services
11	Revised Greenbelt Boundary

Document Control			
Originator	Checked and authorised by		
Name and persons qualifications:	Name and persons qualifications:		
Graham Trewhella MRTPI	Darren Muir		
Job Title:	Job Title:		
Director	Planner		
Signatures:	Signatures:		
			
Project No:	Report ref (file ref):	Date:	
1427	E/Masterplan REV B	September 2018	

# 1 Introduction

This report relates to an opportunity for the planned extension of Culcheth along its western edge. [Figures 1 and 2]

Culcheth is a compact place which is contained on all sides by the green belt. There is little land within the limits of the settlement for consolidation or growth.

Culcheth is, however, a large village with a broad range of services and facilities. It is a sustainable place. It harbours primary and secondary schools, health facilities, a library, a village hall and sports facilities. It also has a good range of shops, restaurants and service uses most of which are clustered around the district centre.

## The Warrington Context

The emerging Local Plan for Warrington will provide the framework for growth over a long period to 2037. It is founded on ambitious targets for economic expansion. There is a concomitant need to ensure that sufficient land is allocated for housing.

The majority of new housing is anticipated in the existing urban area of Warrington. However, in order to meet requirements over a 20 year time frame, around one third of new housing is likely to be on land which is currently allocated as green belt.

The distribution of new housing and the associated release of land from the green belt to meet housing needs is projected to be based on a strategy which has a focus on land adjacent to the main urban area of Warrington but also with incremental growth in outlying settlements.

Culcheth is one of the outlying settlements where incremental growth is likely. New housing at Culcheth will contribute to the long term sustainability of local services and local business. It will provide a choice of housing and a chance to deliver new homes in the early part of the Local Plan period.

This report will show that the planned growth of Culcheth is best accommodated on the land at the south western edge of the settlement. It will demonstrate how the housing at this location can be integrated into the grain and structure of the village, it will explore how the housing will be delivered and it will examine the implications for the long term permanence of the green belt.

Figure 1 - Context Plan: Aerial Photograph

LEGEND  
Gross Site Boundary  
Area = 18.86 ha / 46.60 ac



Reproduced from Ordnance Survey material with the permission of the controller of the Mapline's Stationery Office under the License No. 180287  
Map data © 2018 Google



Figure 2 - Context Plan: Ordnance Survey Base

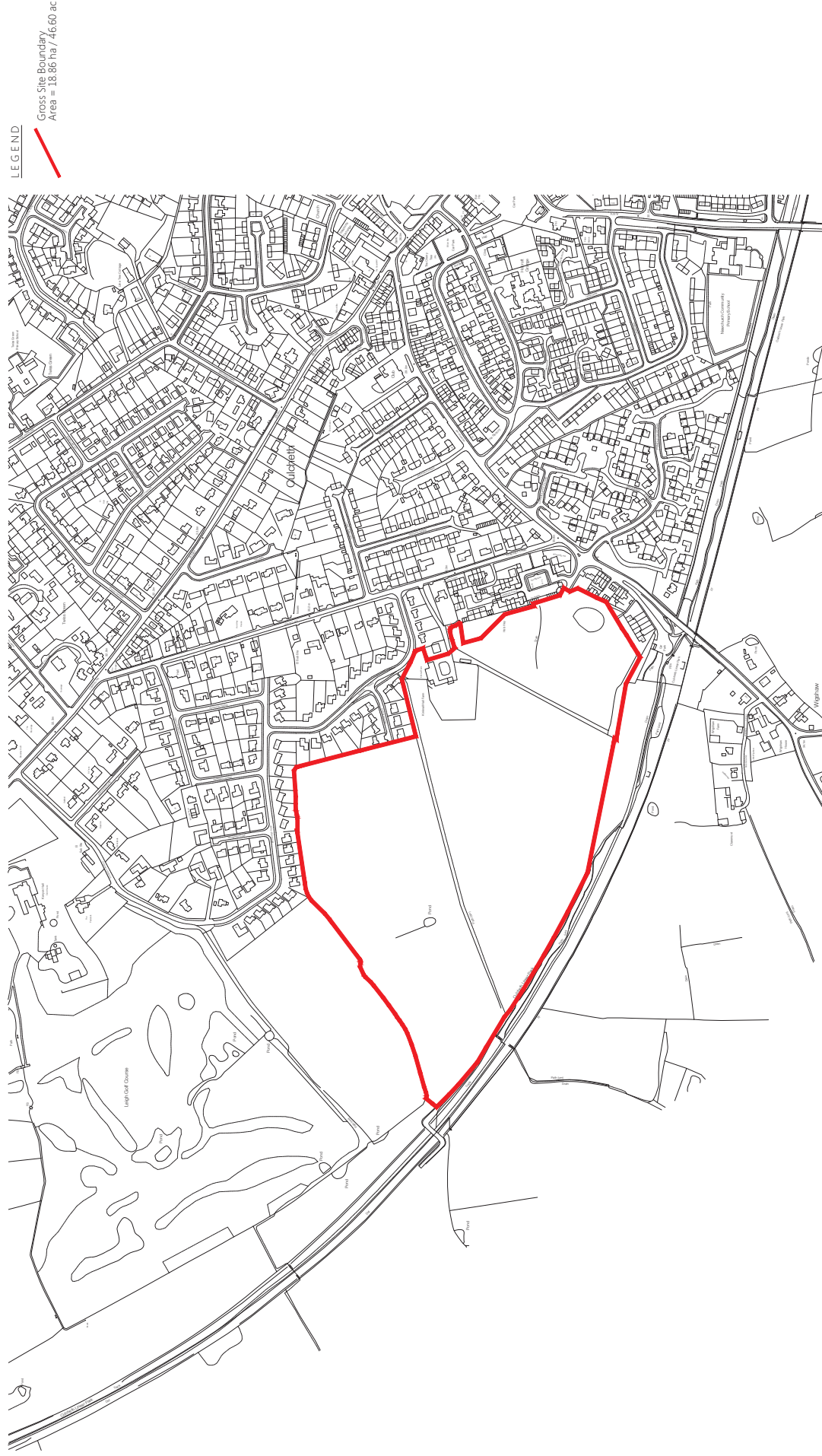
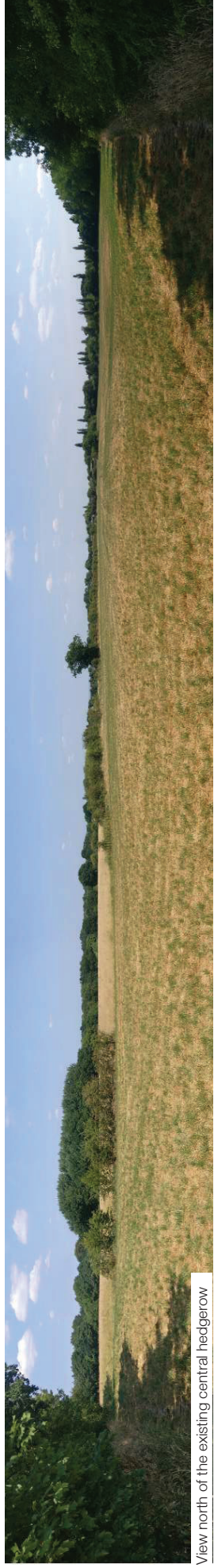


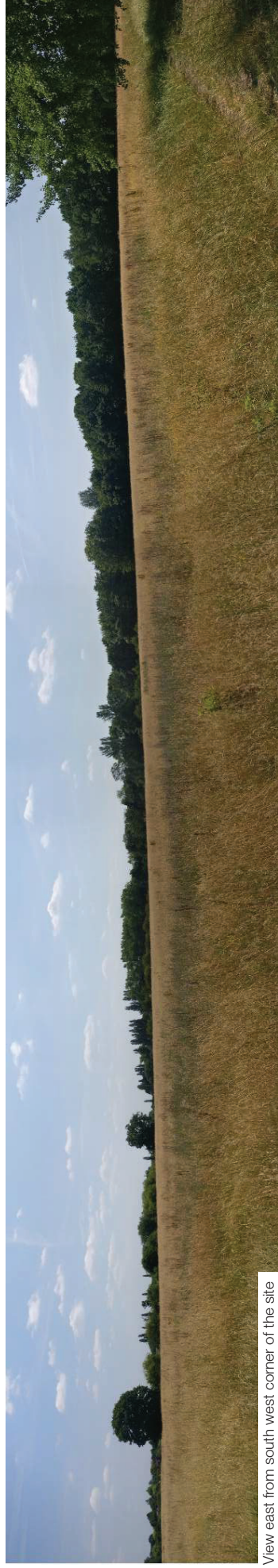
Figure 3 - Panoramic Photographs



View north west from the south eastern corner of the site.



View north of the existing central hedgerow



View east from south west corner of the site



View north showing the properties on Brookfield Road

## 2 The Site and it's Context

The land addressed in this report falls at the southwestern edge of Culcheth. It is reasonably well contained. The eastern and, in part, the northern boundary of the land is contiguous with the existing housing on the outer edge of the village. The western boundary is the former rail line which now functions as the Culcheth Linear Park.

The majority of the land is open pasture, but there are linear corridors of trees and groups of trees. One of the linear corridors of trees coincides with a public right of way which bisects the site. It is a route which links the village of Culcheth to the Linear Park. [Figure 4]

At one interface with the village there is a barn and paddock, adjacent to Hob Hey Lane. This marks the location of the former Old Kingnall Hall which was once surrounded by a moat fortification. By the late 19th Century Old Kingnall Hall had been demolished and the moat infilled [Figure 5]

There is a site contiguous to the north of the land which has value for wildlife. This is the Eleven Acre Common Local Wildlife Site (LWS). This is not a statutory designation but it does point to a need to ensure that any development activity does not erode its biodiversity value.

The Culcheth Linear Park is characterised by a strong and continuous band of mature trees. This provides the backdrop along the outer edge of the subject land.



Culcheth Linear Park



Kirknall- Hall Farm

Figure 4 - Site Analysis

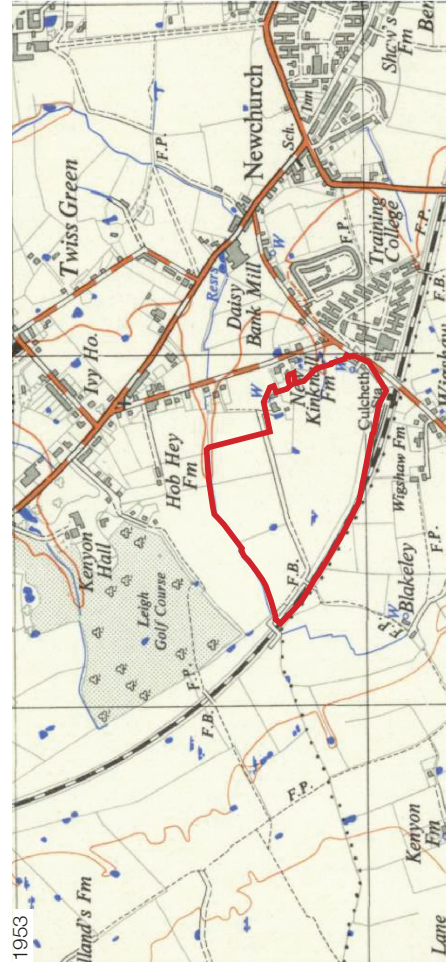
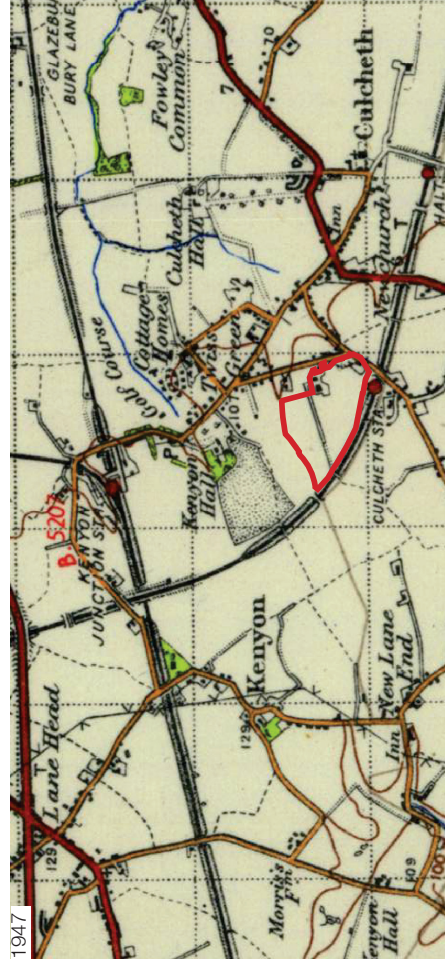
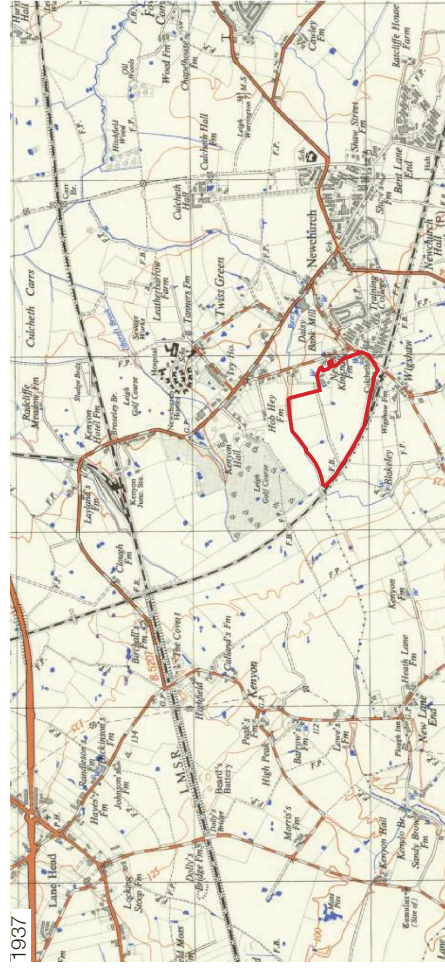
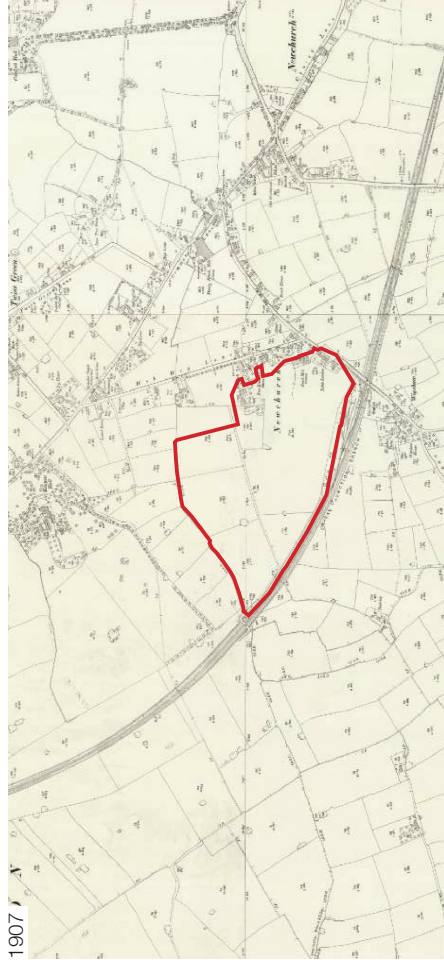


Reproduced from Ordnance Survey material with the permission of the controller of the Ordnance Survey Office under the Licence No. 180297. Map Data © 2018 Google





Figure 5 - Historic Plans



### 3 Planning Policy Context

The Preferred Development Option of the emerging Warrington Local Plan was subject to consultation in the summer of 2017. It sets out the preferred approach to growth and new development over a 20 year period which ends in 2037.

The Preferred Development Option seeks to secure the majority of development over the plan period within existing built up areas but it recognises that projected needs will necessitate the release of land from the green belt.

The majority of land to be released from the green belt will be at the margins of the urban area of Warrington but in order to achieve balance and choice and to meet sustainability objectives there is a justification for the incremental growth of outlying settlements.

There is no proposal in the Preferred Development Option which gives a definite distribution of new housing at the outlying settlements. There are however, indicative numbers attached to a selection of settlements. For Culcheth the indicative capacity of development in the green belt that surrounds the village is 300 houses. The Preferred Development Option does not show allocations around the outlying settlements. This is a decision that is left to the later stages of the plan making process. It is a decision that will be guided by several considerations including:

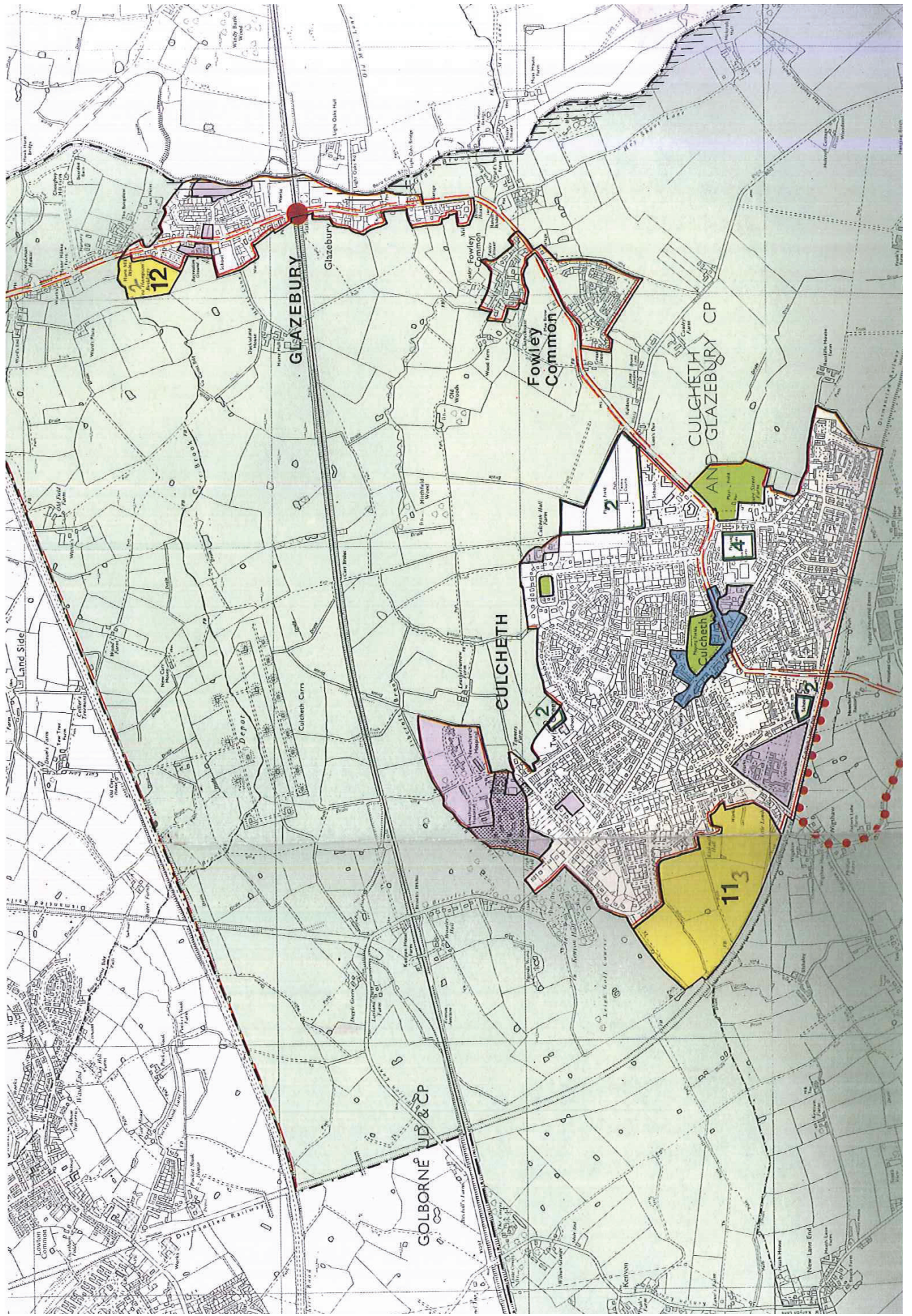
- An assessment of the implications for the character of the settlement
- The permanence of the amended green belt boundary
- Transport impacts

It is pertinent to point to an earlier version of the development plan for Warrington. The Deposit Draft of the Warrington Borough Local Plan was issued in 1994 and subject to a public inquiry in 1996/7. This Plan was not adopted as by 1998 Warrington gained unitary status and work commenced on a new Unitary Development Plan (UDP) instead. Notwithstanding this, the Draft Deposit Local Plan explored Areas of Search around key settlements. This was land to be excluded from the green belt and safeguarded to meet long term development needs. The Draft Local Plan Inspector's Report recognised that Areas of Search were needed to meet long term development needs and supported the rationale for safeguarding land around the two largest villages – Culcheth and Lymm.

The single Area of Search [Figure 6 - Reference 11 and hatched in yellow] around Culcheth includes the land which is promoted in this report. Through the process of detailed assessment at the time of preparing the Deposit Draft of the Warrington Borough Local Plan the subject land at the southwestern margin of Culcheth was seen as the most appropriate and most sustainable location for the growth of the village.

[Ultimately the subsequent Warrington Unitary Development Plan (UPP) did not take forward Areas of Search and the safeguarding of land. This is because the Regional Spatial Strategy for the North West (RPG 13) aimed to focus development on the central areas of Liverpool and Manchester / Salford and that, at the time, there was no immediate requirement to review the green belt]

Figure 6 - Extract from Warrington Borough Local Plan Deposit Draft 1994



## 4 The Proposed Development

The land, by virtue of its location and scale, offers the opportunity to secure the managed or planned expansion of Culcheth. New housing development can be integrated into the fabric of the village through the use of links to the existing network of roads and footpaths. The housing will be well contained or enclosed by the trees and woodland at the outer edge of the land.

The primary point of vehicular access will be from a roundabout junction on Wigshaw Lane which, at present, serves the agricultural land. A secondary access can be secured onto Clifton Avenue on the eastern edge. Clifton Avenue leads onto Hob Hey Lane, a principal route running through the village. [Figure 7]

At each of these points of access there is a chance to establish a distinct character. The access from Wigshaw Lane is alongside a block of woodland. This woodland and new sustainable drainage ponds will give an immediate identity at this threshold to the development. At the access from Clifton Avenue the opportunity is taken to incorporate the long established barn in a parkland setting which is defined by an arc of water which will provide surface water attenuation. The arc of water is a reference to the moat fortification of Kirknall Hall Farm. [Figure 8 shows an illustrative layout at this point of access]

Linear corridors of trees and block of trees are retained where practical and provide a structure for the new development. Along the northern boundary in particular, adjacent to the Local Wildlife Site, the belt of trees will be strengthened to provide a suitable transition from the new housing area to the locally designated wildlife site. Another feature that will provide structure for the new housing development is the right of way which bisects the site. This is set in a generous green corridor. It will provide easy and safe connections between the village of Culcheth, the new housing development and the Culcheth Linear Park.

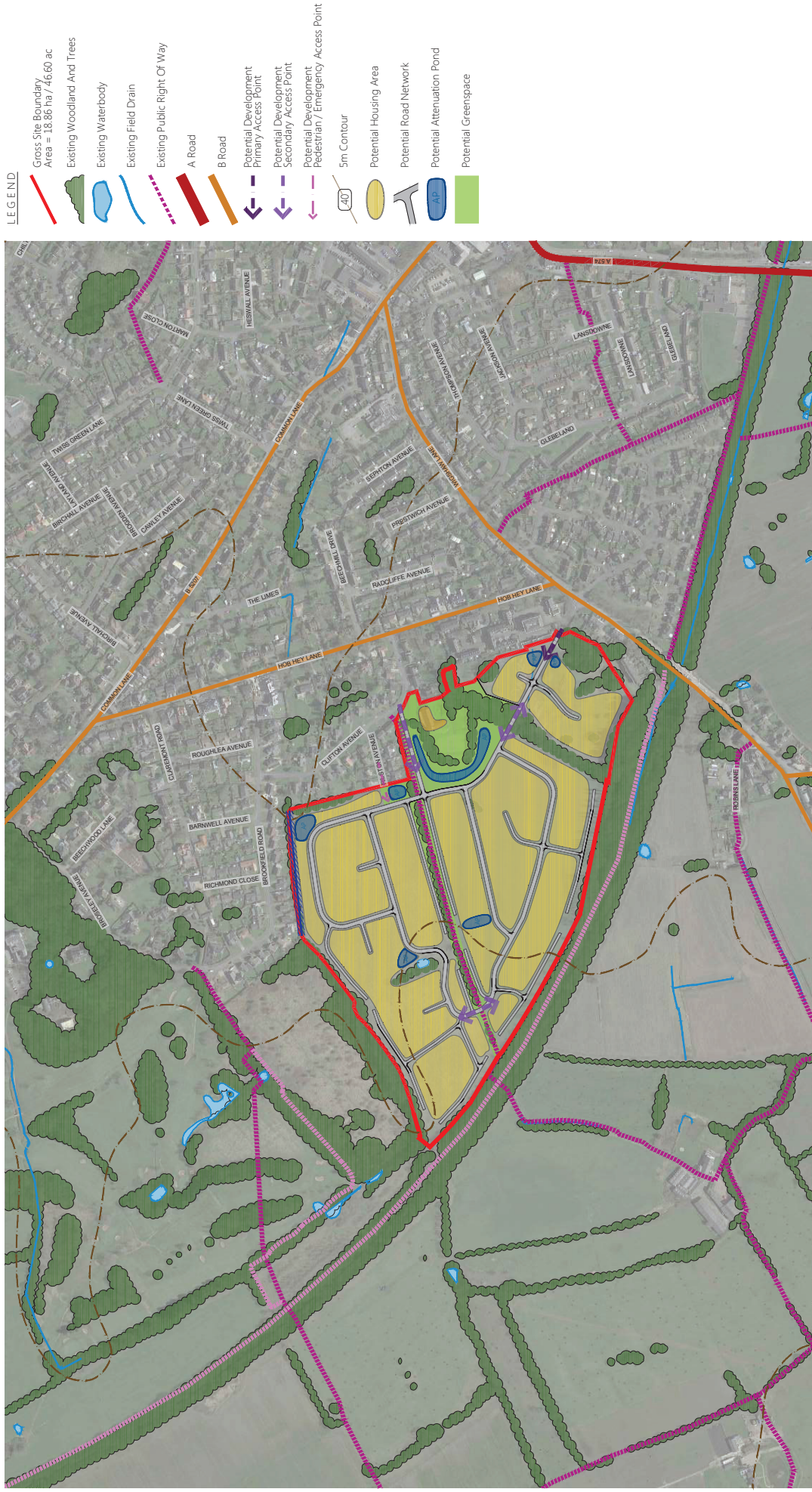
The dominant land use will be housing. It is anticipated that there will be a range of house types, sizes and tenures including a significant number of affordable houses. However, there is provision for other uses and activities. The existing barn has the potential to be refurbished and converted to provide a community based use, such as an assembly space, meeting rooms, a community café, exhibition space or similar [Figure 8].

There is also a generous network of green and open spaces providing for the recreational and leisure needs of the new resident population and the surrounding community.

The indicative land areas are:

- Gross Site Area: 18.86 ha
- Housing development: 14.53 ha
- Area of retained woodland/ hedgerows : 2.43 ha
- Public open space, play area, linear greenspace: 1.90 ha
- The housing yield for the land is likely to be in the range of 350-450 houses.

Figure 7 - Development Masterplan



Reproduced from Ordnance Survey material with the permission of the compiler of the Agency's Stationery Office under the Licence No. 188/287  
Map Data © 2018 Google



Figure 8 - Kirknall Hall Farm



Kirknall Hall Farm building refurbished for community or leisure uses

\* Neighbourhood Equipped Area for Play  
A central play space for the community

## 5 Accessibility and Sustainability

There are recognised principles that govern the extension of towns and villages. One of the key principles is a movement framework that encourages walkable neighbourhoods including strong links to existing facilities and services.

Existing facilities and services will be given added strength and can be improved or extended where necessary if the new housing is reasonably accessible.

An appraisal of the context of the land and connections shows that there is the potential to develop good quality, safe and commodious links between the new housing and everyday services and facilities [Figure 9 and 10].

In general, these services and facilities will be within walk or cycle distance of the new housing for example:

- The district centre, medical centre and library are less than 600 metres from the south eastern edge of the land.
- The nearest primary schools are to the north east of the land.
- There are bus stops within 400 metres of the key points of access and closer to the secondary point of access.

In, addition, there is a high level of accessibility to the walking and cycling recreational routes at the edge of Culcheth. These provide ready links into the open countryside that surrounds Culcheth.

Figure 9 - Context, Connectivity, Services and Facilities

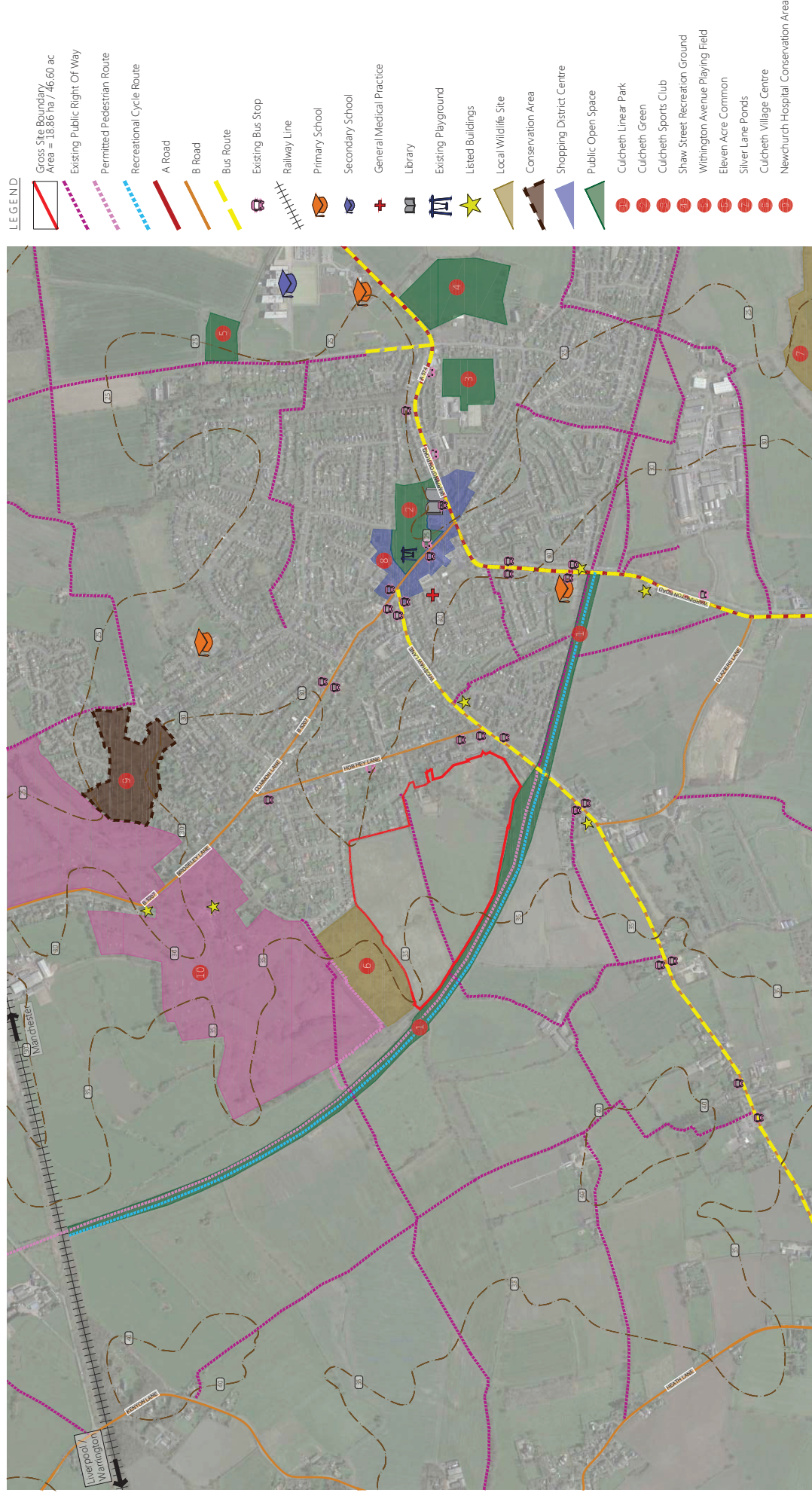
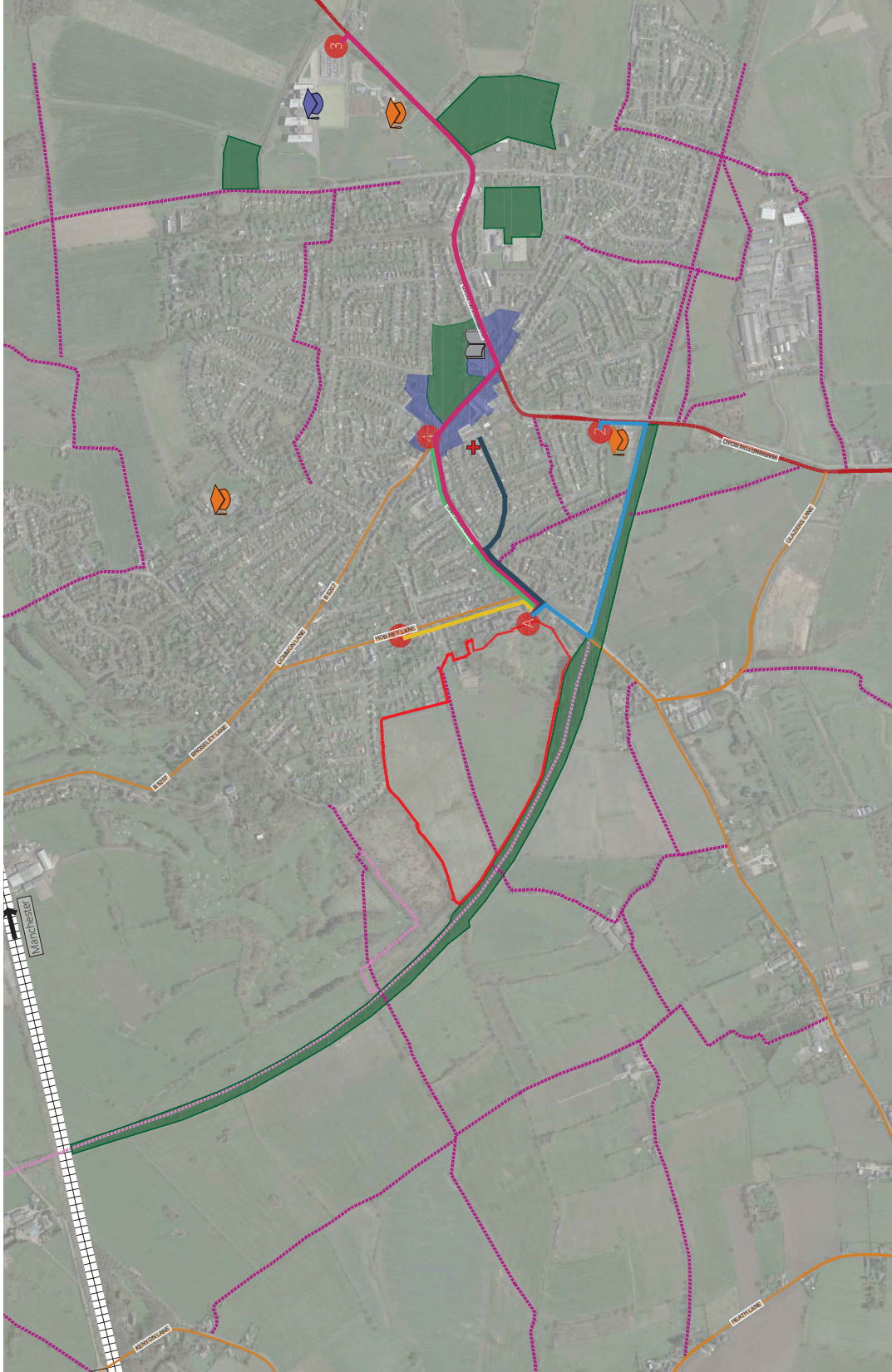




Figure 10 - Routes to Local Facilities and Services

LEGEND

- Gross Site Boundary  
Area = 18.86 ha / 46.60 ac
- Existing Public Right Of Way
- A Road
- B Road
- Bus Route
- Existing Bus Stop
- Railway Line
- Primary School
- Secondary School
- General Medical Practice
- Library
- Shopping District Centre
- Bus Stops  
Distance 360m
- Primary School  
Distance 1150m
- Secondary School  
Distance 1770m
- Shopping District Centre  
Distance 340m
- Medical Centre  
Distance 550m



Reproduced from Ordnance Survey material with the permission of the compiler of the Agency's Stationery Office under the Licence No 188287  
Map data © 2013 Google



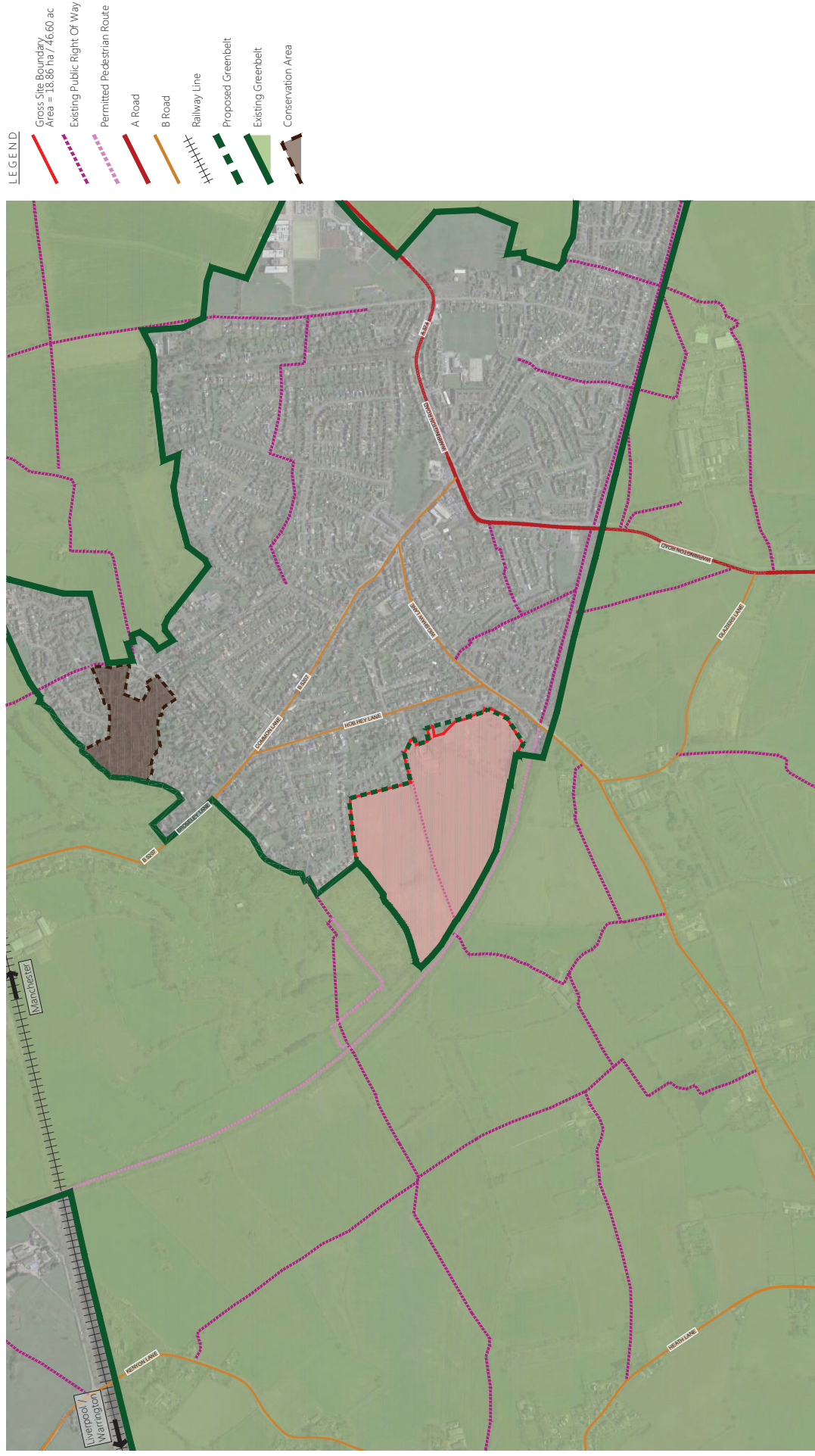
## 6 The Green Belt

The removal of the land from the green belt needs to be assessed against the particular contribution it makes to the five purposes of including land in the green belt. This assessment below recognises the conclusions of the Green Belt Assessment for Warrington (Addendum following Regulation 18 Consultation), but differs slightly in its conclusions. The Green Belt Assessment divides the land into two parcels which are given references CH14 and CH15. The overall assessment is that parcel CH14 makes a weak contribution to green belt purposes and that parcel CH15 makes a moderate contribution to green belt purposes. The latter takes into account the safeguarded route for HS2.

Green Belt Purpose	Considerations	Impact	Comments
1. To check the unrestricted sprawl of large built up areas	The degree to which the Warrington urban area will sprawl	None	The two parcels are not adjacent to the Warrington urban area and do not contribute to this purpose
2. To prevent neighbouring towns from merging into one another	The extent to which any gap between towns is narrowed	None	The parcels do not contribute to preventing towns from merging
3. To assist in safeguarding the countryside from encroachment	Any previous or existing development. The degree to which land is contained.	Moderate	The existing boundary of the green belt is not durable. It consists of the rear curtilages of gardens along the eastern edge. There will be encroachment into the existing countryside but the land parcels are well contained by firstly the Culcheth Linear Park and, beyond this by the HS 2 route. These are durable boundaries. The northern boundary is less well defined – it is a path and linear corridor of trees – but beyond this is a locally designated wildlife site which protects land from encroachment.
4. To preserve the setting and special character of historic towns	The inter-relationship with designated historic assets	None	The parcels are not adjacent to a historic town. There are no key vistas or viewpoints to be preserved
5. To assist in urban regeneration	The degree to which investment is diverted	Minor	There is a less than significant impact on initiatives to secure urban regeneration

Overall, the two parcels do not make a significant contribution to the purposes of including land in the green belt. There will be encroachment into open countryside but this will be up to a well recognised and durable outer boundary – the Culcheth Linear Park. [Figure 11] The Culcheth Linear Park is a recognisable feature of the landscape and will provide a defensible edge to the green belt.

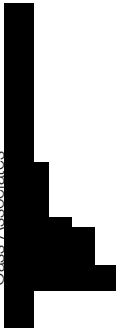
Figure 11 - Revised Green Belt Boundary



Reproduced from Ordnance Survey material with the permission of the compiler of the Agency's Stationery Office under the Licence No J 88/287  
Map data © 2015 Google



Cass Associates



[www.cassassociates.co.uk](http://www.cassassociates.co.uk)

architecture  
masterplanning  
planning  
landscape  
conservation

---

**Cass**  
associates

## Appendix B

Masterplan and Development Report for Land south of Glazebrook  
Train Station



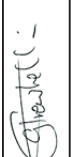

# Land at Glazebrook, Warrington

Masterplan and Development Report

August 2018

# Contents

1	Introduction
2	The Site and its Context
3	Planning Policy Context
4	The Proposed Development
5	Accessibility and Sustainability
6	The Green Belt
7	Green Belt
8	Conclusion
<b>Figures</b>	
1	Context Plan: Aerial Photograph
2	Context Plan: Ordnance Survey Base
3	Site Photographs
4	Site Analysis
5	Historic Plans
6	Extract from Warrington Borough Local Plan Deposit Draft 1994
7	Development Masterplan
8	Park and Ride Layout
9	Context, Connectivity, Services and Facilities
10	Routes to Local Services
11	Revised Greenbelt Boundary

Document Control			
Originator	Checked and authorised by		
Name and persons qualifications:	Name and persons qualifications:		
Graham Trewhella MRTPI	Darren Muir		
Job Title:	Job Title:		
Director	Planner		
Signatures:	Signatures:		
			
Project No:	Report ref (file ref):	Date:	
1426	B/Masterplan REV C	August 2018	

# 1 Introduction

This report introduces and promotes an exciting opportunity to develop a new community neighbourhood which is focused around Glazebrook rail station [Figures 1 and 2]. The station buildings are Grade II listed. The development of a new neighbourhood provides an opportunity to link improvements to the rail station (by third parties) to new facilities within the new housing neighbourhood including a Park and Ride car park.

Pockets of new housing are to be linked to the station by a network of routes. The housing is proposed at a scale which will allow for the planned expansion of Glazebrook in stages over time providing a wide choice of homes, including a proportion of affordable housing. To give diversity to the housing neighbourhoods there is space for new build complementary commercial uses.

The managed development of Glazebrook will be governed by some key principles.

1. A mix of uses and a mix of tenures
2. Housing to support both commercial uses and community activities
3. A movement framework which is geared towards more sustainable modes of travel – rail and bus routes.
4. Walkable residential neighbourhoods.
5. A variable intensity of development with higher density around the rail hub.
6. A high quality public realm providing links between and through the housing neighbourhoods towards the rail station in particular.
7. A long term commitment to the management of public spaces, parking and community facilities

## The Warrington Context

It is anticipated that the growth of Warrington over the next 20 years will be founded on ambitious targets for economic development allied with an associated expansion of housing choice. A significant proportion of that growth will be concentrated in the Warrington urban area or at green belt sites at its edge but there is also a recognised need to distribute development in a way that will benefit outlying settlements, particularly where there is potential to create development in locations that are sustainable.

This report examines the opportunity to develop a highly sustainable new community neighbourhood at Glazebrook. At present Glazebrook is one of the smaller outlying settlements but it holds the considerable advantage of a station on a high frequency rail line linking Liverpool and Manchester. It is also in close proximity to the town of Cadishead (which falls in the administrative area of Salford) where there is a wide range of facilities, services and amenities.



Figure 1: Context - Aerial Photograph



LEGEND



Gross Site Boundary  
Area = 31.81ha / 78.60 ac

Reproduced from Ontario's Survey material with the permission of the controller of the Agency's Survey Office under the Licence No. 186297  
Map © 2018 Google



Figure 2 - Context: Ordnance Survey Base



Reproduced from Ordnance Survey material with the permission of the compiler of the Agency's Stationery Office under the Licence No. J 88/287  
Map data © 2018 Google



# Figure 3 - Site Photographs



View north from Bank Street.



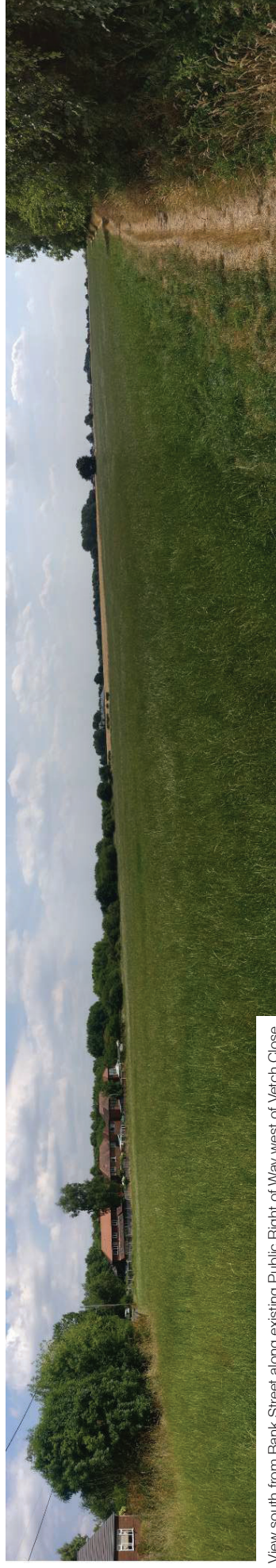
View South down Vetch Close



Existing Cottages adjacent to the Railway Station



View of former Military Camp



View south from Bank Street along existing Public Right of Way west of Vetch Close

## 2 The Site and it's Context

The land addressed in this report forms the significant majority of all open areas at the dispersed settlement of Glazebrook. The extent of the land provides a unique opportunity to take a comprehensive approach to new development.

There is a core parcel of land to the immediate south of the rail station. This is used for agriculture. It is contained on the eastern side by Glazebrook Lane (B5212) and on its southern side by Bank Street. [Figure 4]

On the far side of Bank Street is a further, large area of land of more diverse character. This is formed by a central area of open agricultural land flanked by areas once used as a military camp. Historic plans show the form and scale of the military camp [Figure 5]. The essential infrastructure of access ways and hard standings are still evident on the ground along with other traces of the historic use of the land. Figure 5 also shows that the essential shape and structure of Glazebrook has been consistent over a considerable period with clusters of development along both Glazebrook Lane and Bank Street

A third parcel of land falls on the north eastern side of Glazebrook Lane. It is the open land on all sides of Brush Farm.

Glazebrook is of dispersed character. The majority of housing and other buildings is arranged in linear form along Glazebrook Lane but there are also pockets of housing along the length of Bank Street, and between Glazebrook Lane and Glaze Brook to the east.

The higher order settlement of Cadishead lies to the east of Glazebrook. The Valley and watercourse of Glaze Brook divides the two places but there is a pedestrian link between the settlements. Vehicular routes beyond the outer limit of Glazebrook also link it to Cadishead.



From Bank Street towards Glazebrook rail station



Former military camp

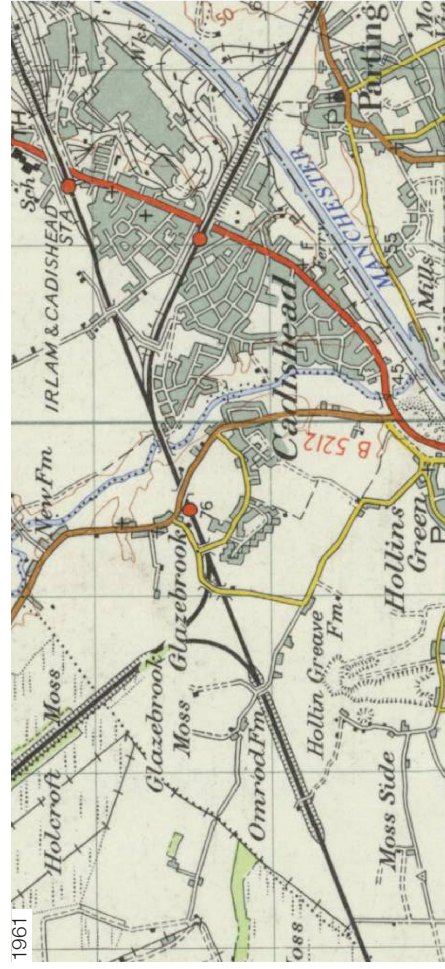
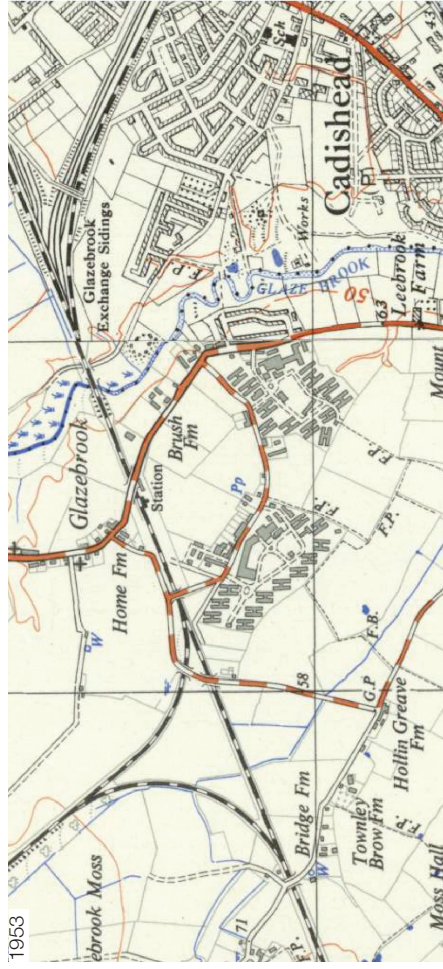
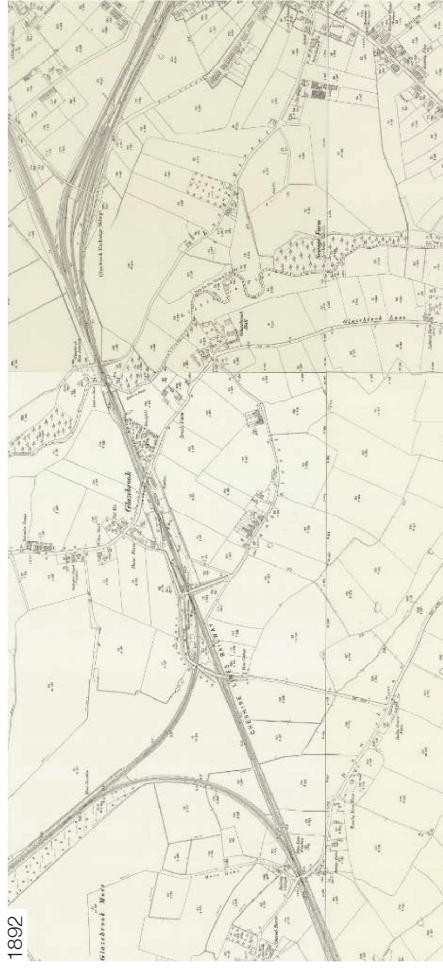
Figure 4 - Site Analysis



Reproduced from Ordnance Survey material with the permission of the compiler of the MapInfo / Stationery Office under the License No. 180287  
Map data © 2018 Google



Figure 5 - Historic Plans



### 3 Planning Policy Context

The Preferred Development Option of the emerging Warrington Local Plan was subject to consultation in the summer of 2017. It sets out the preferred approach to growth and new development over a 20 year period which ends in 2037.

The Preferred Development Option seeks to secure the majority of development over the plan period within existing built up areas but it recognises that projected needs will necessitate the release of land from the green belt.

The majority of land to be released from the green belt will be at the margins of the urban area of Warrington but in order to achieve balance and choice and to meet sustainability objectives there is a justification for the incremental growth of outlying settlements.

There is no proposal in the Preferred Development Option which gives a definite distribution of new housing at the outlying settlements. The Preferred Development Option does not show allocations around the outlying settlements. This is a decision that is left to the later stages of the plan making process. It is a decision that will be guided by several considerations including:

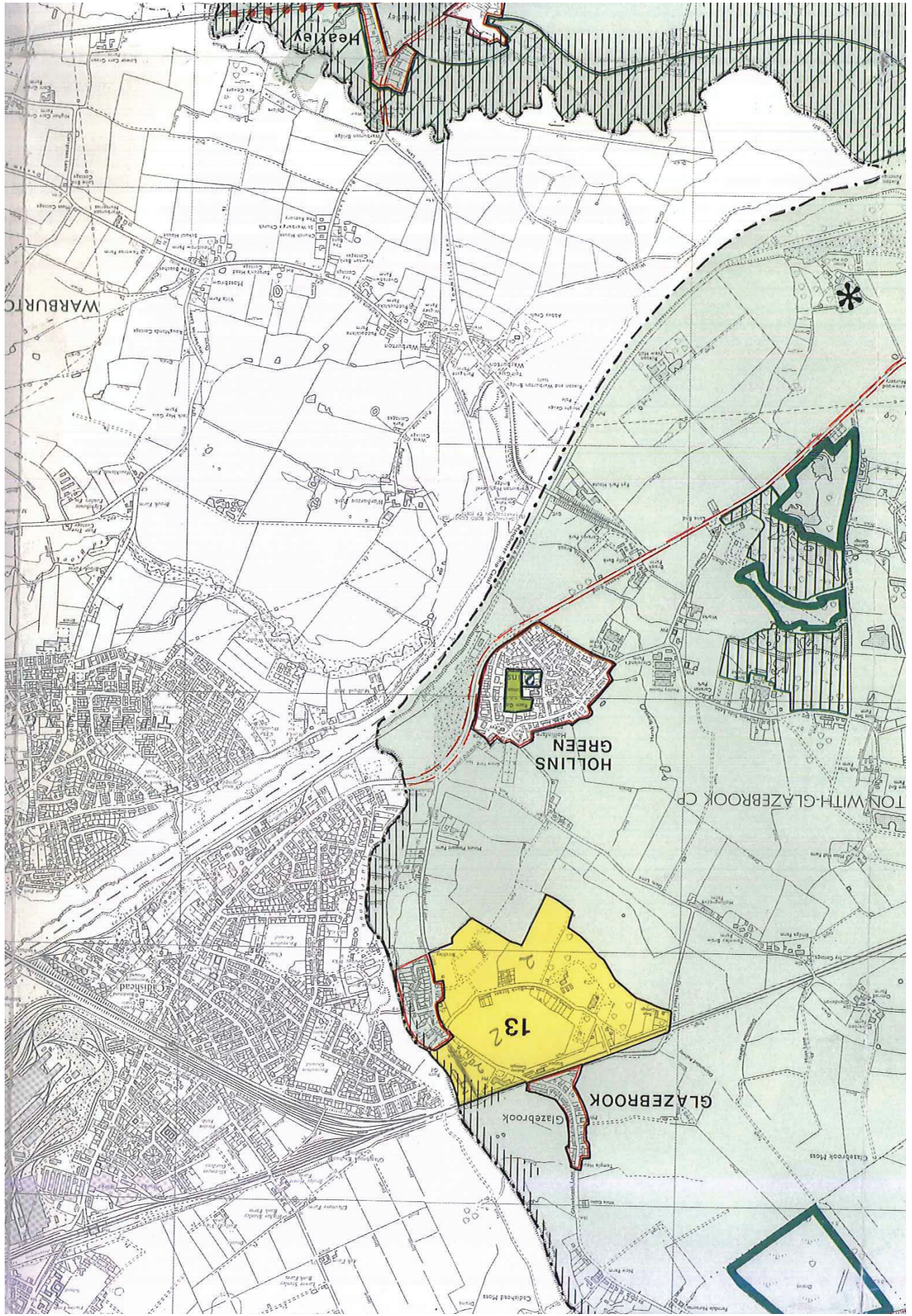
- An assessment of the implications for the character of the settlement
- The permanence of the amended green belt boundary
- Transport impacts

It is pertinent to point to an earlier version of the development plan for Warrington. The Deposit Draft of the Warrington Borough Local Plan was issued in 1994 and subject to a public inquiry in 1996/7. This Plan was not adopted as by 1998 Warrington gained unitary status and work commenced on a new Unitary Development Plan (UDP) instead. Notwithstanding this, the Draft Deposit Local Plan explored Areas of Search around key settlements. This was land to be excluded from the green belt and safeguarded to meet long term development needs. The Draft Local Plan Inspector's Report recognised that Areas of Search were needed to meet long term development needs and supported the rationale for safeguarding land.

The Area of Search [Figure 6 reference 13 and hatched yellow] around Glazebrook is the land which is promoted in this report. Through the process of detailed assessment at the time of preparing the Deposit Draft of the Warrington Borough Local Plan the subject land was seen as the most appropriate and most sustainable location for the growth of the settlement.

[Ultimately the subsequent Warrington Unitary Development Plan (UDP) did not take forward Areas of Search and the safeguarding of land. This is because the Regional Spatial Strategy for the North West (RPG 13) aimed to focus development on the central areas of Liverpool and Manchester / Salford and that, at the time, there was no immediate requirement to review the green belt]

Figure 6 - Extract From Warrington Borough Local Plan Deposit Draft 1994





## 4 The Proposed Development

The focal point or hub for the new neighbourhood is Glazebrook rail station. The rail station building is a designated historic asset. It is a Grade II listed and dates from 1872. The development could provide the stimulus to bring the station buildings into beneficial uses for commercial or community purposes. The proposed development includes a Park and Ride car park with capacity for around 200 vehicles, served by a dedicated access, footpath and cycle routes that converge on the station and a core public space at the interface between the new housing and the rail station.

Access to the park and ride is to be provided by a new road link onto Glazebrook Lane [Figure 8]. The new park and ride will facilitate the use of trains rather than private vehicles for longer trips to and from the main metropolitan areas. This is a key aspect of a more sustainable approach to travel. Increased patronage of Glazebrook rail station will also be a prompt for the effective refurbishment of the neglected station buildings, an important part of the heritage of Glazebrook.

The housing beyond the rail station represents organic growth of the settlement, always based on safe routes from houses to the station. Walkable neighbourhoods can be developed based around a network of high quality pedestrian and cycle paths which links public spaces together including the key space next to the rail station [Figure 7].

There are opportunities to create points of access onto Glazebrook Lane for vehicles at several locations. Traffic can be dispersed and managed through these three key junctions. The internal network of roads are linked together to provide a matrix of new streets throughout the development. Through design and traffic management, traffic generated by new development will not be encouraged along the residential sections of Bank Street. Open spaces and amenity areas will be created around retained zones of woodland. Recreational paths through the green spaces will link to public rights of way and other routes into the countryside surrounding Glazebrook.

There is a discrete pocket of housing around Brush Farm. Given its location and the separation from the other housing neighbourhoods there is the chance to develop a distinct mix and character of houses in this area.

The amount of housing proposed raises the prospect of small scale retail or commercial uses as part of the overall approach. This is proposed on the main frontage to Glazebrook Lane.

Gross Site Area: 31.81 ha

Housing Net Area : 23.14 ha

Green Space, Park and Ride and Commercial Uses: 8.67 ha

Potential Housing: 600 to 700 Houses



Bank Street



Glazebrook Rail Station

Figure 7 - Development Masterplan



Reproduced from Ordnance Survey material with the permission of the compiler of the Agency's Stationery Office under the Licence No 188287  
Map Data © 2018 Google



Figure 8 - Park and Ride Layout



## 5 Accessibility and Sustainability

A central feature of this development at Glazebrook is sustainability. It is focused around the rail station and the opportunity to promote patterns of sustainable travel. The development is also founded on a mix of uses. Housing, greenspaces for recreation, small scale commercial uses and potential community facilities are to be inter-mixed. If this is achieved then the housing will benefit from immediate access to public transport, local retail and the existing Post Office in Glazebrook. All these services will be within easy walking distance of all the proposed housing.

Beyond Glazebrook are the services and facilities to be found in Cadishead. The pedestrian route over the Glaze Brook Valley provides access to bus stops and a primary school within a reasonable walking distance from the eastern edge of the subject land [Figures 9 and 10]. The shopping centre, medical centre and secondary school in Cadishead are further away but there are bus services to these facilities and the opportunity will be explored to introduce a new bus link from Glazebrook to Cadishead.



Glazebrook rail station concourse

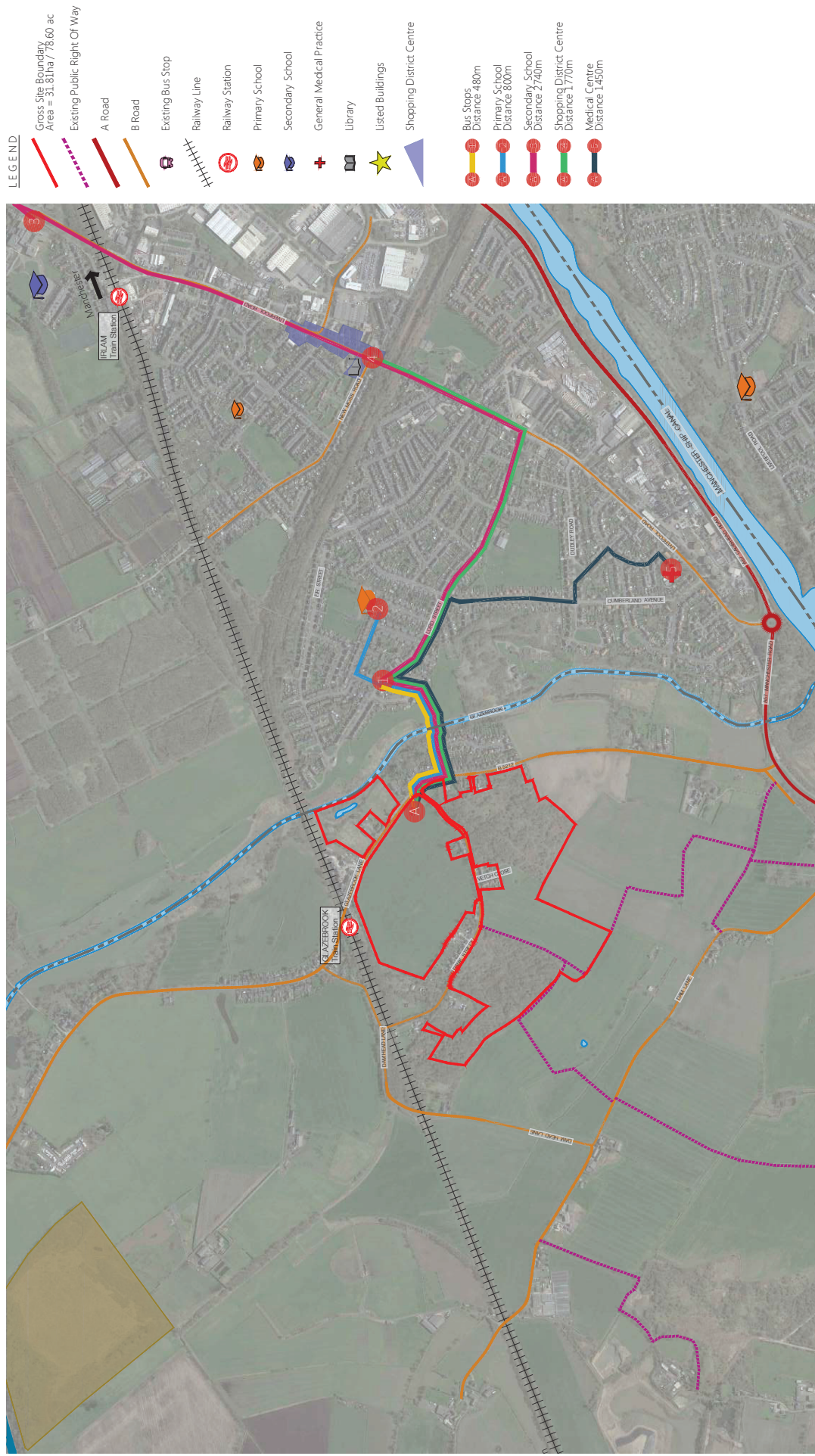


Glazebrook Post Office

Figure 9 - Context, Connectivity, Services and Facilities



Figure 10 - Routes to Local Facilities and Services



Reproduced from Ordnance Survey material with the permission of the compiler of the Agency's Stationary Office under the Licence No. 188287  
Map data © 2015 Google



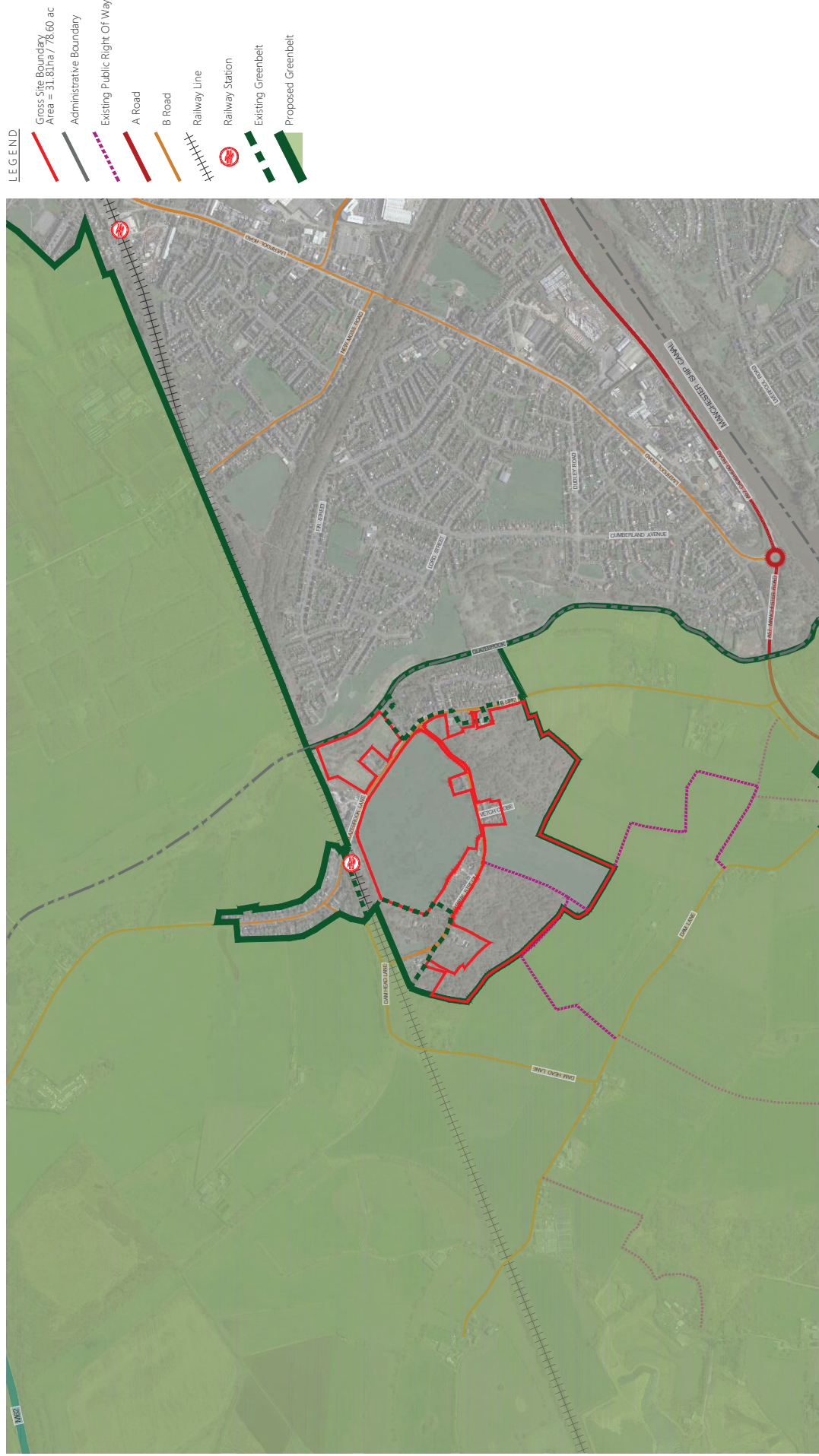
## 6 The Green Belt

The Green Belt Assessment for Warrington includes an appraisal of 'Additional Sites' (July 2017). The subject land is one of the additional sites. The table below takes into account the 'Additional Sites' assessment but is a site specific review of the contribution the land makes to the five purposes of including land in the green belt.

Green Belt Purpose	Considerations	Impact	Comments
1. To check the unrestricted sprawl of large built up areas	The degree to which the Warrington urban area will sprawl	Negligible	The land is not adjacent to the Warrington urban area and does not contribute to this purpose.
2. To prevent neighbouring towns from merging into one another	The extent to which any gap between towns is narrowed	None	The land forms a less than significant gap between Cadishead and the Warrington urban area. Development of the land will not be perceived as the merging of the two towns.
3. To assist in safeguarding the countryside from encroachment	Any previous or existing development. The degree to which land is contained.	Strong/ Moderate	The northern boundary is durable as it is formed by the railway. The southern and western boundaries are less durable as they are formed by field hedges or blocks of woodland. There will be encroachment into the countryside but, to an extent, this is mitigated by the existing development along Bank Street and Vetch Close, and the fact that a significant part of the land is not the countryside as such as it is characterised by the remains of a military camp.
4. To preserve the setting and special character of historic towns	The inter-relationship with designated historic assets	None	The site is not adjacent to a historic town.
5. To assist in urban regeneration	The degree to which investment is diverted	Minor	There will be a less than significant impact on initiatives to secure urban regeneration.

The changes to the green belt boundary to accommodate the development proposed are shown in Figure 11.

Figure 11 - Planning Policy Context





## 8 Conclusion

There is an exciting opportunity to develop a new community neighbourhood around the existing hub of Glazebrook rail station. This will achieve a fundamental planning aim of integrating new housing with public transport. It will also meet the important objective of making the most efficient use of existing fixed infrastructure.

This report has set out how housing can be developed in a sustainable way on land around the rail station. The available land falls to the west and east of Glazebrook Lane (B5212) and to the north and south of Bank Street. There is existing housing along both of these road corridors.

The housing is arranged so that it can be developed in stages. This is facilitated by several points of access onto Glazebrook Lane, the main artery through the settlement. The phased delivery of housing will play a significant role in meeting the medium term requirements for new homes in Warrington.

The housing will be placed in a framework of landscape corridors and pedestrian routes. These will be augmented by the selective retention of existing trees and woodland. Overall the setting for new development will be of high quality. The pedestrian routes will form safe and legible links between the pockets of housing. The routes converge on the new public space next to the rail station - a focal point for the development as a whole.

The sustainability of the new development is strengthened by the inclusion of a park and ride car park near to the station. This will facilitate the use of trains, particularly for those travelling to the metropolitan areas of Liverpool and Manchester.

In addition the new and existing community will be given support by new commercial development. An area of land next to the park and ride car park is to be reserved for uses that are complementary to housing.

There is a significant chance to bring forward highly sustainable and high quality housing development in this location at the interface between Warrington and Salford. This report has shown how this can be realised.





Cass Associates

[www.cassassociates.co.uk](http://www.cassassociates.co.uk)

architecture  
masterplanning  
planning  
landscape  
conservation

---

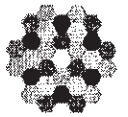
**Cass**  
associates

## Appendix C

Title Plan for Land at Warrington Road, east of Culcheth

HM Land Registry  
Official copy of  
title plan

Title number CH604029  
Ordnance Survey map reference SJ6795NW  
Scale 1:1250 enlarged from 1:2500  
Administrative area Warrington



© Crown Copyright. Produced by HM Land Registry. Reproduction in whole or in part is prohibited without the prior written permission of Ordnance Survey. Licence Number 1000202310.





Warrington Updated Proposed Submission Version Local Plan  
2021-2038

**Consultation Response**

On behalf of Redrow Homes Ltd

Hive Land & Planning

[www.hiveland.co.uk](http://www.hiveland.co.uk)