

# Paper 1: Overview Representation

Representations to the Warrington Proposed  
Submission Version Local Plan

Peel Holdings (Management) Ltd

June 2019



**Turley**

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**Client**

Peel Holdings (Management) Ltd

**Our reference**

PEEM3056

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# 1. Introduction

- 1.1 This Paper forms part of a suite of documents which together comprise the representations of Peel Holdings (Management) Ltd (“Peel”) (“The Peel Group”) to the Warrington Proposed Submission Version Local Plan (“PSLP”).

## **The Peel Group**

- 1.2 The Peel Group is one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major interests and assets across the United Kingdom, including in particular in the North West of England. Over the last four decades, Peel and its partners have invested over £5billion across the North and built on the region’s strengths to help drive its economy. Peel’s track record is one of delivering transformation and creating vibrant places through regeneration and innovation.
- 1.3 Peel acts as both a developer and facilitating landowner in the housing, employment, energy and port sectors, working alongside a wide range of public and private sector partners. It is delivering some of the country’s largest development projects and owns major land and infrastructure assets across the North.
- 1.4 Working with public and private sector partners, Peel is a major advocate of the Northern Powerhouse. Its ambitious projects across a range of sectors will play a key role in realising this ambition and rebalancing the economy. Peel’s Ocean Gateway vision embodies this – a 50 year, £50 billion investment in strategic development opportunities across the North West, book ended by Liverpool and Manchester as engines of the northern economy. It represents an internationally significant programme of private sector investment in transport, logistics, communities, regeneration and sustainable resources. It will capitalise on the region’s potential to compete on a global stage. Warrington sits at the heart of the Ocean Gateway.
- 1.5 The Peel Group of companies includes Peel Land and Property, Peel Ports and Peel Environmental all of whom have major interests in Warrington and the Local Plan.

## **Peel’s interests**

- 1.6 Comments in this representation are provided in the context of Peel’s significant and diverse land and development interests in Warrington, including:
- Sites within the Warrington Waterfront proposed development area (including Peel Ports’ Port Warrington and expansion land and land at Arpley Meadows owned by Peel Land and Property and Peel Environmental);
  - Land within the Warrington South West Urban Extension proposed development area, owned by Peel Land and Property;
  - Major greenfield and Green Belt sites with significant residential development potential across the wider Borough, owned by Peel Land and Property; and

- Various smaller sites within the urban area and outside of the urban area with mixed use development potential, owned by Peel Land and Property.

1.7 Peel has engaged extensively in the Warrington Local Plan preparation over a number of years. Most recently, representations were made to the Regulation 18 consultation in 2016 and the Preferred Development Option consultation in 2017.

## 2. Summary of Peel’s representations

2.1 Peel’s representations to the PSLP are contained within a number of documents as follows:

### Strategic Papers

- **Paper 1: Overview** (this Paper) – provides an overview of Peel’s representations and captures the key points relating to the overall soundness of the PSLP drawing on the evidence presented in other papers
- **Paper 2: Housing need and supply** – provides a critique of the PSLP housing requirement and the sufficiency and certainty of the housing land supply which is relied upon as well as a consideration of the need for the designation of safeguarded land to meet development needs beyond the plan period
- **Paper 3: Spatial strategy** – provides a critique of the spatial distribution of residential development as proposed by the PSLP, including the manner in which the various options for spatial distribution have been defined and assessed by the Council and the claims made by the Council around the adverse impacts and benefits of each. It goes on to consider whether the Outlying Settlements of the Borough should accommodate a greater scale of development than proposed with reference to specific sites opportunities and identifies suitable sites that should be allocated in addition to the draft allocations
- **Paper 4: Proposed allocations in Outlying Settlements** – considers whether, in the context of the Council's current selected strategy of incremental growth in the Outlying Settlements, and notwithstanding Peel’s comments regarding the appropriateness of this, the sites selected for allocation are the most sustainable compared to reasonable alternatives
- **Paper 5: Other matters** – provides comments on a range of other items, including non-site specific policies in the PSLP, the Council’s viability evidence and affordable housing requirements and whether the PSLP Sustainability Appraisal satisfies relevant legal and statutory requirements.

2.2 The content of Peel’s representations to the PSLP is broadly similar to representations made to previous consultations, raising similar points around the soundness of the plan and the basis on which the plan strategy has been selected. However, further work has now been undertaken by Peel to present additional evidence in relation to the matters historically raised and to reflect changes in circumstances since the last representation submission in September 2017. This is captured in its current representations.

2.3 The above papers collectively set out a case for allocating a number of additional sites located within the named Outlying Settlements of the Borough for housing development during and beyond the plan period (the latter as safeguarded land). These sites have been promoted for allocation by Peel over a number of years. However, in some cases the development proposal as presented has been amended to reflect a further review of the sites and settlements in question.

2.4 It should be noted that, considered collectively, the allocation of these sites on top of those selected through the PSLP would not result in a material increase in the level of development in the Outlying Settlements compared to the PSLP. Peel now proposes somewhat less development than it has previously promoted in this regard.

2.5 The suggested allocations are as follows:

- **Land north east of Culcheth** – allocation of land for the development of 300 dwellings during the plan period **and** allocation of additional land as safeguarded to meet development needs beyond the plan period (also with a capacity for 300 dwellings) alongside the provision of highway improvements to Warrington Road, the development of a Country Park and significant other open space for Culcheth
- **Land at Rushgreen Road, Lymm (east of Tanyard Farm)** – allocation of land for the development of 112 dwellings during the plan period **and** allocation of additional land as **either** safeguarded to meet development needs beyond the plan period (also with a capacity for 112 dwellings) **or** as a Green Wedge, or similar policy designation, to retain land in an open form if deemed necessary
- **Land at Manchester Road, Hollins Green** – allocation of land for the development of 292 dwellings during the plan period **or** 93 dwellings during the plan period and 199 dwellings beyond the plan period (the latter through a safeguarded land designation)
- **Land at Lady Lane, Croft** – allocation of land for the development of 195 dwellings during the plan period **or** 83 dwellings during the plan period and 112 dwellings beyond the plan period (the latter through a safeguarded land designation)

### **Outlying Settlement sites Development Prospectuses and technical evidence base**

2.6 Full Development Prospectuses and an associated technical evidence base in respect of the above allocation proposals are submitted as part of Peel’s representations, demonstrating that the proposals represent sustainable and deliverable development opportunities. The Development Prospectuses present conceptual masterplans for each site which reflect the above proposals. In respect of the Manchester Road (Hollins Green) and Lady Lane (Croft) sites, the Development Prospectuses present both development options outlined above (i.e. either full plan period development or a mix of plan period development and safeguarding).

2.7 An additional Development Prospectus and associated technical evidence base is provided in respect of a further site owned and controlled by Peel at North West Croft. Whilst Peel’s representations do not directly support the allocation of a site of the scale of North West Croft in this location at this time, the Development Prospectus and associated evidence base demonstrate that this site is deliverable for residential development, being in the control of an experienced developer and not affected by any insurmountable constraints. In the event of an unmet housing requirement in the Outlying Settlements, the site would represent a sustainable development option. This

site is formally submitted to the Local Plan as such and should therefore be considered as a development option by the Council.

### **Port Warrington**

- 2.8 A separate representation has been submitted by Peel in relation to the proposed expansion of Port Warrington, the proposed Arpley Meadows Nature Reserve and Country Park, and the proposed business hub aspects of the Warrington Waterfront proposals in PSLP Policy MD1.
- 2.9 Those representations demonstrate that the removal of part of the land at Warrington Waterfront from the Green Belt and its allocation for expanded port infrastructure, along with a new employment business hub, in the draft Plan is exceptionally justified and 'sound'. It also confirms that the Arpley Meadows former landfill site (c. 90ha) which is intended to be transformed into a new Nature Reserve and Country Park (c. 181ha) should be retained within the Green Belt. Suggested amendments to the wording of the draft policy are proposed to ensure it aligns with the ambitions and objectives for the delivery of the proposals within Warrington Waterfront.
- 2.10 Peel, working with WBC, have carried out detailed work to demonstrate the need for the allocation and development at Warrington Waterfront for the expanded port infrastructure, business hub, and nature reserve and country park, which are presented in a Draft Development Framework and Draft Justification Document (both of which form evidence documents which accompany the draft Plan). Those reports are subject to further development following consideration of the feedback from the consultation process.

### **South West Urban Extension**

- 2.11 Peel is also part of a consortium of landowners with an interest in the proposed South West Urban Extension site allocation (PSLP Policy MD3 relates). Reflecting a collaborative approach to bringing this site forward for residential and associated development during the plan period, a separate representation is submitted by Peel and the other land owners in relation to this proposal. This expresses support for the allocation but provides detailed comments on the policy and its requirements, including the Council's viability assessment in relation to this site.
- 2.12 A full Development Prospectus and technical evidence base relating to this proposal is also submitted by Peel and other landowners demonstrating the sustainability and deliverability of the site.

### **Key comments**

#### **Support for the regeneration of Warrington**

- 2.13 Peel recognises and supports the strategic objectives of the PSLP including the proposed focus on the regeneration of Inner Warrington and the delivery of strategic and local infrastructure as expressed through Local Plan Objectives W1, W3 and W4. These objectives sit at the heart of the plan's vision. A strategy of focusing growth on the main settlement of Warrington, and extensions to it, flows from these objectives. This is supported by Peel insofar as the realisation of these objectives requires a critical

mass of development to be directed to Warrington as proposed. The proposed allocations in Warrington, including the South West Urban Extension and Port Warrington, are of strategic importance in this regard and are supported by Peel.

**The existence of exceptional circumstances to justify Green Belt release**

- 2.14 Peel also supports the Council's position that exceptional circumstances exist to justify the release of land from the Green Belt. Meeting the Borough's housing and employment needs is one of the PSLP's key objectives, in accordance with the requirements of NPPF. The Council has sought to maximise the use of land outside of the Green Belt, as first priority, and, on the basis of a residual development need beyond this, exceptional circumstances are presented to warrant a Green Belt boundary review in order that the Borough's full plan period housing and employment needs can be met.

**Critical points of unsoundness**

- 2.15 However, it is Peel's position that, as a whole strategy, the PSLP is unsound in the form presented with its critical shortcomings being that it:

- (a) does not seek to meet the proper housing needs of the Borough over the plan period. One consequence of this is that more development can be accommodated in the Outlying Settlements without negative impacts on the achievement of Objectives W1, W3 and W4 of the PSLP
- (b) does not make sufficient provision for an appropriate flexibility allowance, to safeguard against the risk of under delivery of housing given the sources of land upon which it is reliant
- (c) does not make sufficient provision for safeguarded land to ensure the Green Belt can endure over the long term and to avoid the need for a further Green Belt review beyond the plan period
- (d) does not seek to meet the development needs of the Outlying Settlements (during and beyond the plan period) and restricts their growth without a proper understanding of the capacity, the absence of adverse impacts or the beneficial impacts of growth
- (e) does not make sufficient provision for housing growth in the north of the Borough where a significant proportion of Warrington's key employment areas are located. The spatial strategy does not seek to optimise the potential to promote sustainable travel patterns through a spatial synergy between jobs and housing, notwithstanding the focus on growth around the town of Warrington as the primary economic driver of the Borough
- (f) notwithstanding points (a) to (e) above, even in the context of the constrained level of growth proposed within the Outlying Settlements, the sites selected for allocation in the PSLP do not represent the most sustainable options when compared to reasonable alternatives.
- (g) a deficient Sustainability Appraisal process has been pursued



- (h) the published viability evidence is deficient in a number of areas and does not support the policy requirements proposed (e.g. in relation to affordable housing)

2.16 The following policies particularly are unsound as a result of the above:

- DEV1: Housing delivery
- DEV2: Meeting housing needs
- GB1: Warrington's Green Belt
- OS2: Croft
- OS3: Culcheth
- OS5 Lymm: Massey Brook Lane
- OS6 Lymm: Pool Lane
- OS7 Lymm: Rushgreen Road
- OS8 Lymm: Warrington Road

2.17 As presented, soundness issues are also raised in respect of Policies INF5, MD1 and MD5.

2.18 The critical points of unsoundness are summarised as follows:

- The PSLP is in conflict with the National Planning Policy Framework (NPPF) (paragraph 65) on the basis of (a)
- There is a significant risk that the PSLP will not be deliverable and it is therefore **not effective** on the basis of (b)
- The PSLP is **in conflict with NPPF** (paragraph 139e) on the basis of point (c)
- The evidence base is incomplete and does not support the conclusion that the spatial strategy selected, and particularly the constrained approach to the growth of the Outlying Settlements, is the most sustainable when compared to reasonable alternative. The PSLP is **not justified** therefore on the basis of points (d) and (g)
- There are significant flaws in the evidence base which has underpinned the selection of a number of allocations in the Outlying Settlements and more sustainable alternatives exist. The PSLP is **not justified** therefore on the basis of point (f)
- The Council has not presented sufficient evidence to demonstrate that detailed requirements of individual policies can be viably met without undermining the deliverability of the PSLP. The PSLP is not justified therefore on the basis of point (h).

2.19 Soundness can be partly corrected through:

- Making provision for the delivery of at least 1,100 residential dwellings per annum, plus 20% for flexibility and, as a result, identifying additional sites to be released from the Green Belt to deliver a further 5,600 dwellings during the plan period;
- In the context of an increased housing requirement, allocating additional land for residential development within the Outlying Settlements of Lymm, Culcheth, Croft and Hollins Green, including sites promoted by Peel;
- Undertaking a further assessment to consider whether and to what extent the Outlying Settlements can sustainably grow beyond the level evidenced through Peel's representation, including through a revised Sustainability Appraisal; and
- Releasing additional land in the Green Belt to be designated as safeguarded land to meet potential development needs beyond the plan period. Cumulatively, land capable to delivering up to 6,287 dwellings should be released for this purpose, with between 1,149 and 1,351 dwellings on the edge of Outlying Settlements.
- Updating the PSLP viability evidence in accordance with the comments provided.

2.20 The remainder of this paper considers each of these items in turn.

### 3. The correct housing requirement (Paper 2)

- 3.1 The scale of housing provision proposed in the PSLP has been directly informed by a Local Housing Needs Assessment (LHNA), dated March 2019. This concludes that there is a requirement for 945 homes per annum in Warrington over the plan period (2017 – 2037) or 18,900 homes in total. It is observed that this is 4% above the outcome of the standard method (909dpa) which is the '*minimum number of homes expected to be planned for*', as specified by the Planning Practice Guidance (PPG). This reflects the conclusion of the LHNA that simply providing for this minimum would not support future job growth in Warrington and address the evidenced consequences of worsening affordability. This would fail to promote mutually supportive economic and housing policies, and would therefore conflict with the NPPF.
- 3.2 Although it is agreed that job growth in Warrington will generate a need for housing beyond that implied by the standard method, **the necessary scale of uplift beyond this figure is considered to be greater than suggested by the Council.**
- 3.3 The Council's proposed requirement for 945 homes per annum will not support the full quantum of additional jobs likely to be created through the realisation of stated economic objectives, planned investment and the provision of employment land. This is due both to the Council's underestimation of the job growth that is likely to be generated through these initiatives, and its use of unjustified assumptions on the future behaviour of the labour force which understate the additional residents required to support such growth.
- 3.4 The application of more appropriate assumptions on labour force behaviour indicates that **a minimum of 1,077 homes per annum will be required** across Warrington, to support even the Council's estimate of 19,080 additional jobs over the plan period. However, a detailed review by AMION Consulting strongly indicates that the Local Plan should actually plan to accommodate in the order of 23,500 additional jobs. This closely aligns with the Council's previous estimates, which informed the Preferred Development Option (PDO). Up-to-date modelling by Edge Analytics indicates that **approximately 1,210 homes per annum will be required** to grow the labour force and support this higher level of job creation.

**Within the above range, it is considered that the Council should reasonably plan for a minimum of 22,000 homes, or 1,100 homes per annum. This notably aligns with the Council's PDO of 1,113 homes per annum<sup>1</sup>, undermining the claimed justification for reducing this proposed requirement.**

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<sup>1</sup> Paper 2 observes that the alignment suggests that even where the labour-force adjustments preferred in the Council's LHNA were applied to the higher job growth forecast concluded by AMION that housing needs would be broadly in this order as well.

## 4. The sufficiency of the housing land supply and residual housing land requirement (Paper 2)

- 4.1 The housing trajectory within the PSLP is largely reliant upon the delivery of both an embryonic city centre market and the large Sustainable Urban Extensions (SUEs) (South West Extension and the Garden Suburb) to the urban area. A new and emerging town centre market, when including the Waterfront area, is assumed to deliver almost a third of new homes over the plan period, whilst the two large SUEs are expected to accommodate a further third of the requirement. These components would collectively represent almost three in every five homes planned for through the PSLP (59%).
- 4.2 Peel supports the ambitions for the town centre and recognises that work is being undertaken by the Council and its partners to deliver this. However, the evidence that has been produced alongside the trajectory provides only limited details in relation to each parcel assessed through the town centre masterplanning process with very little information to demonstrate that the assumptions on delivery are realistic. It is of paramount importance that the sources of supply are tested robustly, and a failure to undertake this process thoroughly is likely to result in housing needs not being met. Given the unproven nature of the market in this location there is an inherent risk of under delivery.
- 4.3 Peel supports the Council's promotion of Sustainable Urban Extensions (SUEs) as an important component of its planned provision to meet its identified housing needs. These evidently present the opportunity to sustainably provide for a notable contribution to the housing which will be required over the plan period and beyond.
- 4.4 Reflecting on the scale of the Garden Suburb in particular, Peel is however concerned that the Council has failed to provide adequate consideration of the risks of delay or under-delivery of this SUE. A site of this scale has a long lead in time to delivery and requires significant upfront infrastructure investment. The risk of delay is high for this reason. The SWUE is considered relatively low risk in this regard given the level of work undertaken by the consortium promoting this scheme and the conservative estimates applied to its delivery trajectory. The Garden Suburb is clearly on a very different scale and so the risk of delay and under delivery is higher.
- 4.5 For different reasons, this heightened risk applies equally to development within the urban area where the Council is reliant on the emergence and growth of a town centre residential market from a relatively low base position. This market is investor led and susceptible to fluctuations in wider economic conditions and confidence. The risk of under delivery is high.
- 4.6 The PSLP highlights an expectation that housing delivery will be relatively low during the early years of the plan period, as a direct consequence of the proposed land supply. A stepped trajectory is therefore proposed despite there being a pressing need for housing, evidence of worsening affordability and trends showing strong short-term job growth. The PSLP can meet needs consistently over the plan period by identifying a more diverse portfolio of housing land, including sites with a realistic prospect of delivery earlier in the plan period.

- 4.7 Individually and collectively the points identified in Paper 2 provide a clear indication that the proposed supply of residential land in the PSLP carries a number of risks that the PSLP will under-provide against the full quantum and range of housing needs evidenced.
- 4.8 The Council has recognised this general point and the resultant need for an increased level of flexibility to be written into the plan. However, the inclusion of a 10% uplift in the housing requirement to account for this is the minimum standard requirement.

**In light of the increased risk of under delivery given the components of the supply the PSLP warrants a higher flexibility allowance of 20% to be included to deliver its housing requirements.**

### **Residual housing land requirement**

- 4.9 Taking the above and section 3 together, an unmet housing requirement which the PSLP does not seek to deliver is identified. The PSLP is unsound as a result. It cannot proceed on a sound basis unless and until the level of housing it seeks to deliver is increased, with a commensurate increase in the amount of land allocated for development through the release of further land from the Green Belt.
- 4.10 Based on an annual requirement of 1,100 dwellings, and maintaining the flexibility allowance at 10%, the unmet requirement would be **3,410 dwellings**. Non-Green Belt development opportunities are maximised through the PSLP and so this additional requirement would need to be met through further Green Belt releases **on top of** those proposed through the PSLP.
- 4.11 If the annual housing requirement were maintained at 945 dwelling per annum but the flexibility allowance were increased to 20%, the unmet requirement would be **1,890 dwellings**. For the same reasons this requirement would need to be met through further Green Belt releases **on top of** those proposed through the PSLP.
- 4.12 Based on an annual requirement of 1,100 dwellings and a 20% flexibility allowance, the unmet requirement would be **5,610 dwellings** which again would need to be met through further Green Belt releases **on top of** those proposed through the PSLP.
- 4.13 It is Peel's position that the proper housing requirement for the Local Plan equates to at least 1,100 dwellings per annum and that a 20% flexibility allowance should be added to this reflecting the makeup of the supply upon which the Local Plan is reliant.

**In order for the PSLP to proceed on a sound basis, the housing requirement set out in Policy W1 should be increased to a minimum of 22,000 units (20 x 1,100). Policy DEV1 will need to be adjusted to identify sources of supply which, cumulatively, can deliver at least 26,400 residential dwellings (22,000 + 20%). This will require the release of additional land from the Green Belt capable of delivering a further 5,610 dwellings over the plan period.**

## 5. The need for safeguarded land (Paper 2)

- 5.1 The PSLP does not make provision for any safeguarded land to meet potential development needs beyond the plan period. It is the Council's position that the PSLP over-allocates land for development during the plan period (relative to the plan period requirement) and that the housing need will fall beyond the plan period to the extent that Green Belt boundaries will not need to be subject to further review after 2037 for at least 10 years.
- 5.2 It is Peel's view that the Council has failed to demonstrate that the Green Belt will endure in the long term and thus the PSLP does not satisfy the requirements of NPPF paragraph 139e based on the evidence presented. It is unsound as a result.

### Housing need beyond the plan period

- 5.3 Peel does not accept that the annual housing requirement beyond 2037 will reduce as suggested by the Council. There is strong evidence to indicate that the rate of jobs growth over the plan period will be maintained beyond the plan period. This is supported by the Council's own evidence base (including the 2017 Metro Dynamics Report) as well as evidence submitted by Peel and prepared by AMION consulting which illustrates the catalytic effect of investment – growth stimulating growth.
- 5.4 The success of the Local Plan will have realised a larger Borough and higher performing economy, setting a new baseline from which future development requirements will be determined. There is no justified reason to conclude that the economic success story of Warrington will then stop or even slowdown in this context. Housing pressures and the need for housing will similarly be maintained beyond 2037.
- 5.5 Even if one disregards the above points, an assumption that the annual housing requirement beyond the plan period will drop by some 35% compared to the proposed PSLP requirement (or 44% against Peel's proposed requirement), as suggested by the Council, represents a high risk strategy given that **ensuring**<sup>2</sup> Green Belt boundaries endure over the long term is a critical part of the Green Belt boundary review process as confirmed by paragraph 136 of NPPF. This embodies the need for a high level of certainty. Proceeding on the basis that requirements might fall is not a sound approach in this context
- 5.6 For the purposes of determining the need for the designation of safeguarded land, it is appropriate to proceed on the assumption that the post-plan period housing requirement (2037 to 2047) will be maintained at least at 1,100 dwellings per annum.

### Sources of post-plan period supply

- 5.7 The Council identifies a series of post-plan period sources of land upon which it intends to rely to avoid the need for further Green Belt release beyond the plan period. These are considered in turn.

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<sup>2</sup> The Oxford English Dictionary definition of 'ensure' is 'Make certain that (something) will occur or be the case' <https://en.oxforddictionaries.com/definition/ensure>

- **Neighbourhood Plans:** there is little evidence to suggest that Neighbourhood Plans deliver any more housing than they are required to, under direction from the Local Plan. Neighbourhood Plans will not deliver an additional source of housing land therefore and cannot be other than in general conformity with the Local Plan.
- **Technological advances:** In the context of Warrington, and its physical age and character, including the general absence of older 'inner city' employment land, there is no evidence that 'technological advances' will yield a future supply of land for development. This should not be relied upon in this regard.
- **Flexibility allowance:** It is entirely conceivable that all land allocated for development during the plan period will be delivered during the plan period. This includes any additional land allocated on the basis of the proposed flexibility allowance (set at 10% through the PSLP). The PSLP justifies land to be removed from the Green Belt on the basis of this flexibility allowance. The allocations related to the flexibility allowance are not phased or treated separately to any other allocation. On the basis of full delivery of the allocations (with the exception of some land within the town centre masterplanned areas and the Garden Suburb) as projected and planned for, the requirement for housing in the next plan period from 2037 will be determined against a new baseline at that point – that baseline being a household population which reflects full delivery of the Local Plan and the level of development it directly supports. There is therefore no basis for assuming that an over allocation during the plan period can count towards meeting needs beyond.

### **Safeguarded land – quantitative requirement**

- 5.8 Having regard to the above points, Peel does not agree that the Council has satisfied the requirements of paragraph 139e of NPPF. The PSLP is in conflict with the NPPF and is unsound as a result.
- 5.9 Peel's calculation of the amount of safeguarded land required in different scenarios is presented in Table 5.1 overleaf.

**Table 5.1: Quantitative safeguarded land requirement**

|                            |   | PSLP scenario<br>(adjusted only to<br>include a<br>continuation of plan<br>period annual<br>requirement i.e. 945<br>dwellings per<br>annum) | PSLP housing<br>requirement with<br>flexibility<br>allowance<br>excluded | Peel's proposal |
|----------------------------|---|---|--|-----------------|
| A                          | Total post-plan<br>period<br>requirement<br>(2037 – 47) | 9,450   | 9,450  | 11,000          |
| B                          | Additional<br>supply within<br>plan from<br>flexibility | 1,890   | 0  | 0               |
| C                          | Illustrative<br>urban area<br>capacity after<br>2037    | 1,816   | 1,816  | 1,816           |
| D                          | Small sites<br>allowance 2037<br>– 47                   | 608   | 608  | 608             |
| E                          | Garden suburb<br>delivery post<br>2037                  | 2,289   | 2,289  | 2,289           |
| <b>A-B-<br/>C-D-<br/>E</b> | <b>Residual<br/>safeguarded<br/>requirement</b>         | <b>2,847</b>  | <b>4,737</b>   | <b>6,287</b>    |

Source: Turley

- 5.10 Table 5.1 demonstrates that even if Peel's position regarding the flexibility allowance and the increase in the plan period annual requirement (from 945 to 1,100 dwellings per annum) were not accepted, and thus only its position regarding a continuation of the plan period requirement to 2047 (rather than a drop off beyond 2037) were, there would still be a need for the Local Plan to designate safeguarded land capable of delivering 2,847 dwellings. This would increase to 6,287 if all of Peel's points were accepted. A midrange scenario is also presented in the table above.

#### **Safeguarded land – spatial distribution**

- 5.11 There is a need to also ensure the post-plan period supply is fairly distributed across the Borough. This is a critical part of ensuring the requirement for a further Green Belt



review is avoided as it is reasonable to assume that all settlements of the Borough will have a need for housing beyond 2037.

- 5.12 In total safeguarded land capable of delivering a minimum of 1,149 dwellings and up to 1,351 dwellings should be allocated around the Outlying Settlements based on Table 5.1 and reflecting that the Outlying Settlements account for 13% of the total population of the Borough. This would represent a 'proportionate distribution' approach to the post-plan period and thus avoiding pre-empting the next Local Plan strategy. It reflects that none of the identified post-plan period supply (including within the town centre and Garden Suburb) would contribute to meeting the needs of the Outlying Settlements and thus their post-plan period needs are likely to be met exclusively through Green Belt releases.

**In summary, in order for the PSLP to proceed on a sound basis, additional land capable of delivering 6,287 dwellings should be released from the Green Belt and designated as safeguarded land to meet development needs beyond the plan period. Of this, land around the Outlying Settlements capable of delivering 1,351 dwellings should be released for this purpose.**

## 6. Spatial distribution and the approach to the Outlying Settlements (Paper 3)

6.1 The Council's approach to the distribution of residential development across the Borough, the definition and appraisal of options for such distribution and the reasons for the selection of the preferred Spatial Option is unsound as presented. The justification for the selected strategy is largely set out in the Development Options and Site Assessment Technical Report (March 2019) published alongside the PSLP.

6.2 The Council has selected a spatial strategy defined by limiting growth within the Outlying Settlements to 'incremental' levels (c10% household growth) based on:

- (a) assessing a range of Spatial Options which do not reflect the full extent of reasonable alternatives. Specifically the Council has failed to consider a *moderated* version of 'Spatial Option 3' against which to benchmark the constrained strategies for the Outlying Settlements considered (i.e. Spatial Options 1 and 2).

Spatial Option 3 is characterised by a significant diversion of residential dwellings away from Warrington and the **major** expansion of Outlying Settlements. It is an outlier relative to Spatial Options 1 and 2 which are reflective of a constrained approach to the growth of the Outlying Settlements – Spatial Option 1 more so than 2. In defining Spatial Option 3 in these terms, the appraisal process is unable to reveal the realistic capacity of the Outlying Settlements and the extent which they are able to grow in a sustainable manner. It is unproven that a strategy of constraining the development of the Outlying Settlements to incremental levels is necessary to avoid the harm which the Council conclude would arise from Spatial Option 3

- (b) failing to plan for a level of overall housing development which meets the proper requirement for the Borough over the plan period. With an increased "headroom requirement" an increased level of development in the Outlying Settlements would not conflict with the strategic objectives of the PSLP in relation to regeneration and growth of the main settlement of Warrington
- (c) notwithstanding the above, drawing unproven and unsubstantiated conclusions regarding the adverse impacts which would result from Spatial Option 3
- (d) related to (c), a flawed approach to appraising an option of higher growth within the Outlying Settlements in not considering specific settlements and sites which would deliver that growth
- (e) a failure to properly consider the development needs of the Outlying Settlements and define the harm to their future vitality and sustainability that may be caused by constraining their growth

6.3 The above are reflective of a process which has had little to no regard to how the Outlying Settlements should be treated through the Local Plan in order to achieve a

sustainable future for these settlements. They have been set aside throughout the process and are evidently an afterthought in respect of the strategy pursued. There has clearly been a lack of robust testing of properly defined and well thought out options for the Outlying Settlements, informed by a consideration of what their future may be. The Council has produced no evidence whatsoever around their development needs, potential, and threats to their sustainability as is needed to properly understand the benefits and adverse impacts of growth options as part of the development of a sound Local Plan.

### **The range of Spatial Options**

- 6.4 It is evident that the spatial options, and particularly the parameters of Spatial Option 3, have been purposely developed with the pre-emptive objective of demonstrating that, based on a housing requirement of 945 dwellings per annum, only a very constrained approach to the growth of the Outlying Settlements (as reflected in Spatial Options 1 and 2) would be considered to be a sustainable strategy on balance. This is achieved through presenting and testing a single scenario of greater than incremental growth within the Outlying Settlements which sits at the relative extremity of reasonable alternatives, reflecting a significant diversion of development away from Warrington. A moderated, and more realistic, alternative version of Spatial Option 3 should have been considered as part of an exercising in testing the sustainable growth capacity of the Outlying Settlements.
- 6.5 Until this exercise is undertaken, the Council is unable to conclude with any degree of certainty that restricting growth within the Outlying Settlements to the level proposed (i.e. incremental levels) is necessary, as a controlling measure, to avoid the harm which it has assumed would otherwise arise from a strategy of beyond incremental growth. Testing a moderated version of Spatial Option 3 would allow the sustainable capacity of the Outlying Settlements to be revealed in this regard including whether and how much they can grow beyond incremental levels without adverse impacts arising. This step is necessary as part of an exercise in properly defining potential spatial strategies for the Borough and then considering these on a comparative basis.

### **The effect of a higher housing requirement**

- 6.6 The Council's assessment of Spatial Options has been undertaken only in the context of housing requirement scenarios which do not reflect the proper housing needs of the Borough (see section 3). As a result, and as tested, Spatial Option 3 would result in a significant diversion of housing away from Warrington. The Council claims this will be harmful to the extent that the minimum critical mass of development required in Warrington to achieve the regeneration objectives of the PSLP would not be provided. As a consequence, the option of higher level of growth within the Outlying Settlements is deemed to perform poorly against the strategic objectives of the PSLP (particularly W1, W3 and W4). In essence, this Spatial Option is not given a fair hearing.
- 6.7 Section 3 of this Paper presents Peel's position that the Local Plan should proceed on the basis of seeking to deliver at least 1,100 dwellings per annum. Section 4 outlines that a flexibility allowance of 20% should be added to this.

- 6.8 This increased housing requirement would fundamentally change the outcomes of any assessment of the three Spatial Options considered. Most notably, at this level of growth a strategy of 'greater dispersal' of development (Spatial Option 3 or something closer to it) could be pursued whilst maintaining the same level of development to be directed to Warrington as that proposed through the PSLP.
- 6.9 In this scenario, a strategy of increased dispersal of development to the Outlying Settlements would not offend Objectives W1, W3 and W4 of the PSLP in the manner suggested by the Council. Therefore in the context of a higher housing requirement, as proposed by Peel, the chief reasons for rejecting Spatial Option 3 could not be upheld.

### **Supporting the long term viability of the Outlying Settlements**

- 6.10 The Council has assumed that the incremental growth of the Outlying Settlements will support their long term viability. This position is not accepted by Peel.
- 6.11 The Council has presented no evidence to properly define the development needs of the Outlying Settlements, the extent to which they need to grow to realise a viable and sustainable future and indeed the level of growth needed to achieve this. They have been set aside throughout the process and PSLP has proceeded without properly considering the positive impacts of their growth and the adverse impacts which may arise from constraining their growth.
- 6.12 Peel considers that the Council has significantly understated the beneficial effects of greater levels of growth in the Outlying Settlements. These effects and their viability benefits will only be realised through permitting a material level of growth in these settlements. This is considered in more detail by reference to specific settlements below.

### **The assumed adverse impacts of growth in the Outlying Settlements**

- 6.13 Beyond the adverse impacts on key strategic objectives of the PSLP, the Council's assessment of the Spatial Options makes a number of general assumptions around the capacity of the Outlying Settlements to grow, suggesting they present a higher level of sensitivity to change in a number of areas.
- 6.14 Peel does not agree with the Council's conclusions in respect of the following:
- **Green Belt:** there are opportunities to deliver growth beyond incremental levels in Outlying Settlements (including Lymm and Culcheth) whilst utilising General Areas of Green Belt<sup>3</sup> which make no greater contribution to the Green Belt than those which the PSLP is reliant on to deliver growth around south Warrington and elsewhere.
  - **Settlement character:** there is no evidence that a strategy of higher growth within the Outlying Settlements would be more harmful to their character than the harm caused to the character of defined areas of south Warrington (including Stockton Heath, Grappenhall and Appleton) as a result of growth

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<sup>3</sup> As defined through the Council's 2016 Green Belt Assessment

around these settlements. Whilst part of Warrington, these areas have their own identity, character and history. They are no less sensitive to growth in this regard than the Outlying Settlements. They will be subject to major expansion through the Local Plan proposals which will, as matter of fact, alter their character.

- **Mineral resources:** there are significant areas of land around the Outlying Settlements, including Lymm, Croft and Culcheth which are not designated as mineral safeguarded areas based on the PSLP proposals map. A scale of growth beyond incremental levels could be delivered in the Outlying Settlements without harming mineral resources
- **Sustainable transport:** a number of Outlying Settlements are important service centres serving a wider catchment area and providing a wide range of everyday services. The long term viability of these services, and therefore the settlements' service centre functions, will be improved through supporting residential growth, ensuring residents and households can continue to meet their needs locally, thus promoting sustainable transport choices. Further, the northern Outlying Settlements particularly are well located in relation to key employment areas in the north of the Borough such as at Birchwood Park. Their growth can achieve a sustainable co-location between housing and employment thus supporting more sustainable transport choices.

### **The need to consider settlements and sites in appraising Spatial Option 3**

- 6.15 Notwithstanding the above, the Council has evidently attempted to apply a number of generalisations to the Outlying Settlements, considered on a collective basis, and their sensitivity to change through the appraisal process. However, a number of these claimed impacts and sensitivities are inherently tied to the land – i.e. whether the sensitivities exist or impacts will occur can only properly be understood and assessed by reference to specific sites and development proposals which could deliver Spatial Option 3.
- 6.16 It is therefore simply not possible to make assumptions around impacts resulting from higher levels of growth within Outlying Settlements in the manner attempted by the Council in its appraisal of Spatial Options and without a consideration of the site and development proposals which will deliver that growth. That is the only robust way of testing the sustainability of a strategy of higher growth in the Outlying Settlements.
- 6.17 Until that exercise is undertaken, a number of the conclusions drawn by the Council around the adverse impacts of Spatial Option 3 (including in respect of the four areas noted above) cannot be substantiated and should be disregarded. It is therefore Peel's position that the Council has failed to demonstrate that Spatial Option 3, or an alternative strategy of greater than incremental growth in the Outlying Settlements, would give rise to adverse impacts in these areas compared to Spatial Option 2 (as the selected option).
- 6.18 The PSLP's 10% growth cap to the Outlying Settlements has been arrived at without evidence as to the harm more development would cause. It is entirely arbitrary. This is a fundamental issue for the Local Plan given that the assumed growth constraints of the Outlying Settlements is one of the two principal reasons for constraining growth in

the Outlying Settlements (the other being that this is assumed to impact on the regeneration and growth potential of Warrington).

### Summary

6.19 It is Peel's position that the Council's selection of a strategy of incremental growth within the Outlying Settlements is based on unsubstantiated and incomplete evidence and a flawed approach to the appraisal of spatial options. Most notably:

- The Council has developed the Spatial Options with a view to demonstrating that a strategy of, at most, incremental growth within the Outlying Settlements would represent the most sustainable approach when considered on balance. Spatial Option 3 achieves this by defining a strategy of beyond incremental growth, sitting at the relative extremity of reasonable alternatives and without having tested a more moderated version of this to understand the realistic sustainable capacity of the Outlying Settlements. Considered on its own, Spatial Option 3 does not provide a suitable alternative strategy to benchmark Spatial Option 2 against and this process is therefore unable to reveal whether Spatial Option 2 is appropriate in the context of reasonable alternatives.
- The Council has made a number of flawed conclusions regarding the adverse impacts of supporting a higher level of growth within the Outlying Settlements and has attempted to do so without reference to specific sites and development proposals as required to fully understand such impacts and the realistic growth capacity of these settlements
- The Council has failed to appraise the Spatial Options in the context of a higher housing requirement. If it had, it would find that Spatial Option 3 (or a moderated version of it) would not conflict with strategic objectives of the PSLP in the manner reported when this is considered against the PSLP housing requirement
- The Council has presented no evidence to define the development needs of the Outlying Settlements and establish how much housing they need to accommodate to achieve a viable future. The 10% growth proposal is entirely arbitrary and is wholly unproven to be sufficient in this regard

**These flaws in the process of appraising and selecting the preferred spatial strategy and the clear gaps in the evidence base relied upon mean that the PSLP has not been proven to represent an appropriate strategy in the context of reasonable alternatives. It is not justified and is therefore unsound.**

## 7. Culcheth: beyond incremental growth (Paper 3)

- 7.1 Having regard to the issues raised in the previous sections, it is necessary to consider the sustainable growth capacity of the Outlying Settlements as part of the proper appraisal of the spatial options and determination of an appropriate strategy for the distribution of the 'headroom' housing need identified.
- 7.2 Reflecting this, Peel has undertaken work to consider the growth potential of Culcheth, including understanding the potential impacts of its growth beyond the so called incremental levels and the beneficial outcomes which may be realised by this. Recognising the flaws in the Council's approach, it has done this by reference to specific site proposals which may deliver this further growth, where possible, including Peel's proposed allocation on land to the north east of Culcheth.
- 7.3 For the purposes of considering this matter, Peel has defined a growth scenario of Culcheth which reflects the following:
- Retaining the existing proposed housing allocation (Site OS3) – 200 units
  - Retaining the urban capacity taken from the SHLAA – 37 units
  - Allocation of an additional site during the plan period (land north east of Culcheth proposed by Peel) – 300 units
  - Allocation of an additional site as safeguarded land to meet needs beyond the plan period (land north east of Culcheth proposed by Peel) – 300 units.
- 7.4 This work demonstrates that the settlement of Culcheth can accommodate the above scale of development (providing **537 dwellings** during the plan period plus an allowance for some beyond this) in a sustainable manner. The settlement's actual sustainable growth capacity may be higher than this. This would be a matter for the Council to consider further in determining how the full housing requirement headroom revealed by Peel should be distributed across the Borough.
- 7.5 It should be noted that providing 537 dwellings in Culcheth would represent a c18% increase in the number of dwellings within the settlement over the plan period. This is therefore a relatively modest scale of growth.
- 7.6 Notwithstanding this, Paper 4 of Peel's submission (considered in section 9 of this Paper) considers the sites selected for allocation in Culcheth, and the other Outlying Settlements, to determine whether, in the context of a continuation of the PSLP strategy of incremental growth within the Outlying Settlements, these sites are in fact the most sustainable options for delivering this growth and thus are justified allocations relative to alternative options.

## **Peel's proposal - land north east of Culcheth**

- 7.7 Peel proposes the allocation of land to the north of Culcheth for residential development to provide 300 dwellings during the current plan period, plus a further 300 dwellings beyond the plan period through a safeguarded land designation. In total an area of land would be released from the Green Belt with capacity for 600 dwellings.
- 7.8 This approach will ensure a long term and managed strategy for the growth of Culcheth is in place, reflecting the need for the Outlying Settlements to accommodate safeguarded land to meet development requirements beyond the plan period (see Paper 2). In this context there are significant advantages to locating safeguarded land where it can build on and be planned as part of plan period releases, thus reducing the number of separate Green Belt releases in the settlement and avoiding a piecemeal approach to its long term growth. Candidate Green Belt releases need to be considered in this context.
- 7.9 Peel's safeguarded land proposal provides a logical next phase expansion of its proposed plan period allocation, utilising land which, in the context of the development of the plan period land, would make a limited Green Belt contribution. That Peel's site lends itself to this comprehensive approach is a significant advantage over other potential Green Belt releases where no such opportunity beyond the plan period exists without breaching durable Green Belt boundaries and releasing more sensitive Green Belt land.
- 7.10 Peel's proposal is articulated through a detailed Development Prospectus which shows how the site could come forward for development. For completeness this presents the comprehensive development of the site including both the proposed allocation area and the safeguarded land beyond, representing the site's development over two plan period. This is supported by a comprehensive technical evidence base which has informed the site masterplan and which demonstrates that the site is deliverable and that its development will not rise to unacceptable impacts in respect of:
- Access and traffic impact
  - Ecology
  - Agricultural land
  - Flood risk and drainage
  - Arboriculture
  - Landscape, townscape and visual impact

### **Strategic open space proposals**

- 7.11 Alongside residential development, Peel proposes to deliver a new Country Park to the north of its proposed residential development, accessible to and benefitting the wider community, as well as a more formal open space/recreation area to the east of the residential development area. The latter could include a range of open space uses, including sports pitches and allotments as required.



- 7.12 The Country Park and open space proposal would be a major asset for Culcheth and a unique benefit of the proposed development. It can address a critical shortfall in the provision of various typologies of open space within Culcheth as reported in the Council's 2015 Open Space Audit.
- 7.13 In total, Peel proposes the release of 58.43 ha of land from the Green Belt comprising the plan period residential development area, land to the west to be safeguarded and land to the east accommodating the open space / recreation area. The latter would be subject to a new policy designation as '*Proposed open space/recreation to be delivered alongside residential development to the east*', thus precluding its development for other purposes. The Country Park to the north would also be subject to a '*Proposed country park*' policy designation but would remain within the Green Belt. The site's proposed policy treatment is illustrated within the plan at Appendix 1.

#### **Transport / access proposals**

- 7.14 The masterplan for Peel's scheme shows how this proposal could incorporate a new access and drop-off area for Culcheth High School, located off the development access road that connects with Warrington Road. The new site access from Warrington Road could include a priority controlled junction or roundabout; either option would allow for provision of a drop-off zone within the Peel site for the school. Easy access will be provided to this area located a short driving distance from the main road.
- 7.15 The new facility will allow significantly better management of access to the school with conflicts removed from Warrington Road including the U-turns that are made at the Warrington Road/Holcroft Lane Junction. This will result in operational and road safety benefits, for both school related and general traffic movements addressing longstanding issues associated with the traffic and transport impacts of the school.

#### **Testing the settlement growth scenario**

- 7.16 In considering the higher level of growth identified above, and by reference to specific sites which could deliver that growth, the assessment in Paper 3 demonstrates that:
- **Sustainable transport:** The growth of Culcheth beyond incremental levels is entirely compatible with the objective of promoting sustainable transport choices, reducing the need to travel and reducing journey lengths. There are no sustainable transport related constraints to the expansion of Culcheth to deliver 537 dwellings during the plan period, plus a further 300 units beyond.
  - **Green Belt:** the expansion of Culcheth to the level proposed by Peel can be achieved without utilising land which makes a strategic contribution to the Green Belt. Further, Peel's proposed site north east of Culcheth makes only a moderate contribution to the Green Belt, contrary to the Council's Green Belt Assessment, and the proposed approach to the release of this site, including the designation of land as open space / country park, can provide long term durable boundaries to this part of the Green Belt
  - **Ecology:** the Preliminary Ecological Assessment submitted alongside the Development Prospectus in respect of Peel's proposed site allocation demonstrates that the site is not affected by any ecological constraints and

development can be accommodated in an acceptable manner subject to the employment of standard mitigation measures during construction and operation.

- **Agricultural Land:** the Council's appraisal of candidate sites notes that most of the candidate allocation sites do not comprise Best and Most Versatile agricultural land. In respect of Peel's site, the technical evidence base submitted with the proposed Development Prospectus demonstrates that less than 40% of the site is classed as Best and Most Versatile agricultural land (in this case Grade 3a).
- **Landscape/townscape/character:** Peel's site at north east Culcheth, is located within defined Landscape Character Area 1C: Winwick, Culcheth, Glazebrook and Rixton, which is part of Landscape Character Type 1 – Undulating Enclosed Farmland based on the Council's Landscape Character Assessment (2007). This area is considered to have significant potential to accommodate new development with appropriate landscape, townscape and visual mitigation primarily due to this character area generally consisting of arable farmland, which has changed and adapted as a result of various pressures over time, often degrading in quality in the process.

The site proposed for allocation by Peel and proposed site allocation OS3 lie within different Landscape Character Areas. There are few locations from which both developments would be seen in the context of one another. There would be no adverse 'in combination' impacts on the local landscape or character of the settlement as a result.

- **Education:** The Council's rejection of a higher growth proposal for Culcheth, based on limited secondary education does not reflect the reality of school place allocations or the effect of planned secondary school investment elsewhere. When these points are taken into account, it is evident that additional school age pupils can be accommodated in Culcheth, to meet their secondary education needs locally. In any case, Peel's proposal for land north east of Culcheth identifies an area of land for the potential expansion of Culcheth High School in the event that this were needed to deliver additional school capacity in the settlement.

#### **General benefits of settlement growth**

7.17 The growth of Culcheth beyond incremental levels will also generate further benefits for the settlement, by:

- **Providing the homes required to address an increasingly imbalanced population profile.** A recent decline in the working age population could be reversed through such provision, countering an ageing trend that will otherwise negatively affect the future vitality of Culcheth;
- **Enabling a more marked boosting of past housing delivery,** addressing clear local evidence of imbalance between housing supply and demand;

- **Creating an opportunity to provide a greater number of affordable homes,** based on emerging policies in the PSLP. This would address an existing deficiency of affordable housing in Culcheth, contributing towards an improved mix of housing and allowing lower-income households to form and remain in the settlement; and
- **Maintaining the critical mass and profile of population that is necessary to support the continued operation of social infrastructure in Culcheth.** This includes a limited but established retail offer, which could be challenged if the settlement's growth is constrained.

**Having regard to the above, as part of a re-appraisal of the Local Plan spatial strategy, as necessitated by an increased housing requirement, it is concluded that Culcheth can accommodate at least 537 dwellings over the plan period in a sustainable manner. This would include 500 dwellings through the release of land from the Green Belt, plus the release of additional land capable of delivering a further 300 units beyond the plan period. As part of this, it is proven that Peel's proposal for the north of Culcheth which will deliver 300 dwellings during the plan period and 300 beyond (the latter through a safeguarded land designation) would represent a sustainable approach to the growth of Culcheth.**

**Accordingly, any revised spatial strategy should reflect an approach of greater than incremental growth in Culcheth to at least this extent, including the allocation of Peel's land to the north east of Culcheth as proposed reflecting the unique benefits this proposal will deliver for the settlement and its long term vitality and sustainability.**

## 8. Other Outlying Settlements: beyond incremental growth (Paper 3)

- 8.1 It is evident that the PSLP must respond positively in identifying other opportunities to accommodate additional housing need sustainably. The review of Culcheth's capacity to accommodate additional growth sustainably and indeed realise important beneficial impacts has reinforced the role that the Outlying Settlements can play in this regard and thus highlighting the clear flaws in the Council's reasoning and justification for rejecting higher levels of growth in the Outlying Settlements.
- 8.2 As set out in section 1 Peel is also promoting land in the settlements of Hollins Green, Croft and Lymm. This section reinforces the extent to which the additional homes at these sites can also be accommodated in a sustainable manner within these Outlying Settlements and present additional local benefits compared to those achieved by the PSLP strategy.

### Lymm

#### The settlement growth scenario

- 8.3 Peel proposes the release of land at Rushgreen Road, Lymm (land east of Tanyard Farm) from the Green Belt and its allocation for around 112 residential dwellings during the plan period. If this site were allocated on this basis **alongside** the residential allocations proposed in the PSLP, plus urban area sites identified in the SHLAA, a total of 610 dwellings would be provided in the settlement over the plan period. This growth scenario is tested below.
- 8.4 An additional 610 dwellings in Lymm would represent a c12% increase in the number of households.

#### Peel's proposal

- 8.5 As part of Peel's proposal, a further area of land to the south of its proposed plan period allocation has been identified which could either be safeguarded to meet development needs beyond the plan period (with a capacity of 112 dwellings), reflecting the need for such designations within the Outlying Settlements. As an alternative, this land could be allocated as a Green Wedge to retain a green gap between the southern extent of the developed area of the settlement and the Bridgewater Canal were this deemed to be necessary.
- 8.6 The area's proposed policy treatment is illustrated through the plan at Appendix 2.
- 8.7 Peel's development proposal is articulated through a detailed Development Prospectus which shows how the site could come forward over the plan period. This is supported by a comprehensive technical evidence base which has informed the site masterplan, which demonstrates that the site is deliverable and that its development will not rise to unacceptable impacts in respect of:

- Access and traffic impact

- Ecology
- Agricultural land
- Flood risk and drainage
- Arboriculture
- Landscape, townscape and visual impact

### Testing the settlement growth scenario

8.8 In considering the higher level of growth identified above, and by reference to specific sites which could deliver that growth where appropriate, the assessment in Paper 3 demonstrates that:

- **Sustainable transport:** The growth of Lymm beyond incremental levels is entirely compatible with the objective of promoting sustainable transport choices, reducing the need to travel and reducing journey lengths. There are no sustainable transport related constraints to the expansion of Lymm to the level proposed by Peel.
- **Green Belt:** additional growth can be accommodated without utilising land within defined General Areas of the Green Belt which make a strong contribution to the Green Belt and thus avoiding harming the strategic function of the Green Belt. The site promoted by Peel forms part of a defined Green Belt parcel (Parcel LY16) which is deemed by the Council to make a weak contribution to the Green Belt as set out in the Council's Green Belt Assessment Addendum (2017).

Peel's proposal would utilise the least sensitive area of land within Parcel LY16, located behind a site benefitting from planning permission for residential development secured at appeal (appeal reference APP/M0655/W/18/3200416) and not generally visible from public view points. Peel's site is therefore well contained by existing and emerging development. In the context of the appeal site being developed for housing, the presence of the appeal scheme would also act as a barrier to the further encroachment of the urban area into any retained open land. No adverse cumulative impacts on the Green Belt would arise from the inclusion of Peel's land as a development allocation as proposed.

- **Ecology:** As evidenced through the Preliminary Ecological Assessment submitted alongside the site Development Prospectus, Peel's site at Rushgreen Road can be developed without any material ecological concern.
- **Landscape/townscape/character:** all sites proposed for allocation, including the additional land proposed by Peel, are within the same Landscape Character Type 3: Red Sandstone Escarpment. However, the proposed allocated sites on the western edge of Lymm (allocations OS5, OS6 and OS8) are in a different Landscape Character Area from OS7 and the land proposed for additional release by Peel, which will reduce any cumulative effects on the landscape character arising from additional plan period allocations. In addition, the relative distance and intervening built form between the allocated sites located on the western

edge of Lymm and the allocated site and Peel site to the east, means that there would be no visual or physical connection reducing cumulative visual effects arising from an increased growth scenario.

Any potential landscape/townscape/character impact arising from the allocation of land within Green Belt Parcel LY16 would be felt principally from the release of land to the west of the appeal as the significantly more prominent and exposed area of open land. No in combination effects would be felt through the inclusion of land to the east of the appeal scheme in this regard given its discreet location, lack of general prominence and critically due to the presence of the appeal scheme which screens the land from most public view points.

- **Education:** Lymm High School draws pupils from beyond Warrington and thus additional growth in Lymm would, over time, simply shrink the school's catchment area to a more natural scale. This would also be influenced by the provision of a new secondary school through development of the Garden Suburb. The current capacity position in Lymm is therefore not a reason to restrict the growth of the settlement.

#### **Consideration of benefits**

8.9 Growth beyond the level envisaged in the PSLP can also generate further benefits for Lymm, by:

- **More effectively addressing the consistently high cost of housing in Lymm**, with prices having further risen over recent years when the provision of new housing in the settlement has slowed;
- **Further growing the stock of affordable housing**, addressing a deficiency in the existing stock profile and meeting the needs of those that are unable to afford the high cost of purchase in the local area;
- **Assisting in sustaining demand for the local retail offer**, which plays an important role in serving residents of Lymm and other smaller settlements within the surrounding area; and
- **Helping to sustain the local labour force that is currently drawn upon by local employers**, to support a local economy which currently provides for over 1,800 jobs in the settlement.

**In the context of a significant unmet housing requirement, it is demonstrated that a higher level of growth than that supported by the PSLP can be accommodated within Lymm in a sustainable manner with significant resultant benefits to the long term sustainability of the settlement. Within this context, Peel's proposed development site off Rushgreen Road (east of Tanyard Farm) represents a sustainable development opportunity, not affected by any insurmountable constraints and avoiding land which makes a strategic contribution to the Green Belt. It should be allocated for development for approximately 112 dwellings during plan period with the potential for a further release of Green Belt land to be safeguarded to meet development needs beyond the plan period as proposed with a capacity for approximately 112 dwellings.**

## Hollins Green

### The settlement growth scenario

- 8.10 Peel proposes the release of land to the east of Manchester Road from the Green Belt and its allocation for up to 292 residential dwellings during the plan period. If this site were allocated on this basis **alongside** the existing allocation, a total of 382 dwellings would be provided in the settlement over the plan period. This would be delivered exclusively through the release of land from the Green Belt with no urban sites being identified in Hollins Green through the SHLAA process. This growth scenario is tested below.
- 8.11 As alternative to a plan period allocation of 292 dwellings at Peel's site, a proposal for the release of land to deliver 93 dwellings during the plan period, with 199 beyond the plan period (through safeguarding the balance of the site) has also been put forward by Peel. In this scenario, the settlement would accommodate a total of 183 dwellings during the plan period.
- 8.12 Both of these options are presented in the Development Prospectus for this site. The option of a plan period/safeguarded split is also considered in more detail in section 9 of this Paper and through Paper 4 as a potential **alternative** to the site/s selected for allocation during the plan period by the Council.

### Peel's proposal

- 8.13 Peel's proposal for its land at Hollins Green is articulated through a detailed Development Prospectus which shows how the site could come forward for development in full. This is supported by a comprehensive technical evidence base which has informed the site masterplan and which demonstrates that the site is deliverable and that its development will not rise to unacceptable impacts in respect of:

- Access and traffic impact
- Ecology
- Agricultural land
- Flood risk and drainage
- Arboriculture
- Landscape, townscape and visual impact

### Testing the settlement growth scenario

- 8.14 In considering the higher level of growth identified above, and by reference to specific sites which could deliver that growth, the assessment in Paper 3 demonstrates that:
- **Sustainable transport:** The growth of Hollins Green beyond incremental levels is entirely compatible with the objective of promoting sustainable transport choices, reducing the need to travel and reducing journey lengths. There are no

sustainable transport related constraints to the expansion of Hollins Green to the level proposed by Peel

- **Green Belt:** additional growth can be accommodated without utilising land General Areas which make a strong contribution to the Green Belt and thus avoiding harming the strategic function of the Green Belt. The site promoted forms part of a defined Green Belt parcel (Parcel HG5) which is deemed to make a weak contribution to the Green Belt.
- **Ecology:** The Peel site at Manchester Road, as evidenced through the Preliminary Ecological Assessment submitted alongside the site Development Prospectus, can be developed without any material ecological concern.
- **Agricultural land:** In respect of Peel's site, the technical evidence base submitted with the proposed Development Prospectus demonstrates that less than 50% of the site is classed as Best and Most Versatile agricultural land (in this case Grade 3a).
- **Landscape/townscape/character:** There is limited visual connectivity between the proposed allocated site (allocation OS4) and Peel's site due to the topography and vegetation associated with the A57 Manchester Road. Sequential views when travelling along the A57 are currently enclosed by the roadside vegetation so that both sites are well screened from the route. Both the allocated site and Peel site have defensible boundaries from a Green Belt perspective and would form logical new settlement edges. The limited visual connectivity and few opportunities to view both sites from a single viewpoint limits any risk of an 'in combination' landscape impact arising from the development of both sites within the same plan period. The effects on landscape and townscape character as a result of development of the Peel site would not be considered any differently should the proposed allocated site have been developed.
- **Education:** the Council's suggestion that growth cannot be accommodated on the basis of provision is not justified or supported by evidence. Secondary school capacity is not considered to be a constraint to growth in Lymm or Culcheth, with these schools accommodating much of the demand from Hollins Green residents and the previously raised points therefore remaining relevant. Furthermore, it is recognised that Hollins Green Primary School is close to capacity, though the PSLP nonetheless proposes a level of growth that would generate demand for around 27 places. Supporting modest additional development in Hollins Green, as proposed by Peel, would provide the opportunity to more sustainably address this issue, by providing the funding and demand that is necessary to expand the primary school to a 1 form entry school (as opposed to 0.6 at present).

#### **Consideration of benefits**

- 8.15 Growth beyond the level envisaged in the PSLP can also generate further benefits for Hollins Green, by



- **Addressing an increasingly significant imbalance between housing supply and demand**, which is manifest in rising house prices that have more recently exceeded the borough average. This is highly likely to have been influenced by the fact that new supply has been limited to the provision of only a single new dwelling in Hollins Green over the ten years prior to the emerging plan period (2007-17); and
- **Providing the housing needed to counter recent demographic changes**, which have seen the elderly population of Hollins Green grow significantly and the younger working age population in turn decline. In the context of a significant unmet housing requirement, it is demonstrated that a higher level of growth than that supported by the PSLP can be accommodated within Hollins Green in a sustainable manner with significant resultant benefits to the long term sustainability of the settlement. Within this context, Peel's proposed development site to the east of Manchester Road represents a sustainable development opportunity, not affected by any insurmountable constraints and avoiding land which makes a strategic contribution to the Green Belt. It should be allocated for development.

## Croft

### The settlement growth scenario

- 8.16 Peel proposes the release of land to the west of Lady Lane, Croft from the Green Belt and its allocation for up to 195 residential dwellings during the plan period. If this site were allocated on this basis **alongside** the existing allocation, a total of 270 dwellings would be provided in the settlement over the plan period. This would be delivered exclusively through the release of land from the Green Belt with no urban sites being identified in Croft through the SHLAA process. This growth scenario is tested below.
- 8.17 As an alternative to a plan period allocation of 195 dwellings at Peel's site, a proposal for the release of land to deliver 83 dwellings during the plan period, with 112 beyond the plan period (through safeguarding the balance of the site) has also been put forward by Peel. In this scenario, the settlement would deliver 158 dwellings during the plan period.
- 8.18 Both of these options are presented in the Development Prospectus for this site. The option of a plan period/safeguarded split is also considered in more detail in section 9 of this Paper and through Paper 4 as a potential **alternative** to the site/s selected for allocation during the plan period by the Council.

### Peel's proposal

- 8.19 Peel's proposal for the allocation of land at Lady Lane is articulated through a detailed Development Prospectus which shows how the site could come forward in full over the plan period. This is supported by a comprehensive technical evidence base which has informed the site masterplan, which demonstrates that the site is deliverable and that its development will not rise to unacceptable impacts in respect of:
- Access and traffic impact
  - Ecology

- Agricultural land
- Flood risk and drainage
- Arboriculture
- Landscape and visual impact

#### **Testing the settlement growth scenario**

8.20 In considering the higher level of growth identified above, and by reference to specific sites which could deliver that growth, the assessment in Paper 3 demonstrates that:

- **Sustainable transport:** The growth of Croft beyond incremental levels is entirely compatible with the objective of promoting sustainable transport choices, reducing the need to travel and reducing journey lengths. There are no sustainable transport related constraints to the expansion of Croft to the level proposed by Peel.
- **Green Belt:** additional growth can be accommodated without utilising land General Areas which make a strong contribution to the Green Belt and thus avoiding harming the strategic function of the Green Belt. The site promoted by Peel forms part of a defined Green Belt parcel (Parcel CR4) which is deemed by the Council to make only moderate contribution to the Green Belt.
- **Ecology:** As evidenced through the Preliminary Ecological Assessment submitted alongside the site Development Prospectus, can be developed without any material ecological concern.
- **Agricultural land:** The technical evidence base submitted with the proposed Development Prospectus in respect of Peel's proposal at Lady Lane demonstrates that less than 25% of the site is classed as Best and Most Versatile agricultural land (in this case Grade 3a).
- **Landscape/townscape/character:** The Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal Landscape Appraisal undertaken by Randall Thorp demonstrates for Peel's site at Lady Lane demonstrates that a well-designed development that preserves the existing landscape features within a green infrastructure network and responds sensitively to the setting of the existing landscape features is and that this would not have any significant effects on the character and townscape of the surrounding landscape.
- **Education:** For the reasons expressed in section 7 in relation to Culcheth, secondary school capacity is not considered to represent a constraint on Croft seeing further modest growth, as proposed by Peel. Demand in the wider area served by Croft's two primary schools is projected to fall in future years, with new housing therefore likely to be required to secure their long-term viability. Though currently at capacity, the Council has confirmed that both have some expansion potential where necessary to respond to demand, and this should not therefore act as a constraint to growth.

### **Consideration of benefits**

8.21 Growth beyond the level envisaged in the PSLP can also generate further benefits for Croft, by:

- **Alleviating recent imbalance between housing supply and demand**, shown by increasingly high house prices and an absence of transactions at a level that can be deemed affordable on the basis of wages in Warrington. Greater provision also creates the opportunity to secure a larger number of affordable homes which will contribute to improving the housing mix in the settlement;
- **Enabling a more marked growth in the working age population**, beyond the modest increase that could be supported through incremental growth. This could serve to reverse a 15% reduction in the size of this cohort since 2001, and counterbalance an ageing trend that is expected to continue;
- **Creating a greater critical mass of people and households within Croft that could potentially support the provision of new community facilities and help ensure the ongoing viability of existing facilities**, recognising these are currently limited.

**In the context of a significant unmet housing requirement, it is demonstrated that a higher level of growth than that supported by the PSLP can be accommodated within Croft in a sustainable manner with significant resultant benefits to the long term sustainability of the settlement. Within this context, Peel's proposed development site at Lady Lane represents a sustainable development opportunity, not affected by constraints and avoiding land which makes a strategic contribution to the Green Belt. It should be allocated for development.**

## 9. Outlying Settlements: the sites selected for allocation (Paper 4)

- 9.1 Notwithstanding the comments in sections 3 to 8 above, Peel's submission demonstrates that, even in the context of a continuation of the PSLP strategy of incremental growth in the Outlying Settlements to the level proposed, the Council has not selected the most sustainable sites for allocation compared to reasonable alternatives.
- 9.2 If the Local Plan were to be progressed as currently presented, alternative sites should be selected for allocation in the settlements of Culcheth, Croft, Hollins Green and Lymm.

### General comments

- 9.3 As a general point Peel does not agree with the Council's proposal of automatically discounting sites which are deemed to make a strong contribution to the Green Belt from the site appraisal process in considering potential allocations. This approach does not reflect that the overall sustainability of a site for development can only be determined through a full consideration of the site's characteristics against a wide range of criteria.
- 9.4 The Council's approach runs contrary to the guidance in paragraph 138 of the NPPF in this regard. Green Belt harm needs to be given the appropriate level of weight alongside wider sustainability considerations in selecting sites for release.

### Culcheth

- 9.5 Peel's proposal for the allocation of land to the north of Culcheth, including the provision of strategic green infrastructure and local highways improvements, is summarised in section 7. This proposal includes the proposed allocation of a site with a capacity to deliver 300 dwellings during the plan period with a further 300 dwellings beyond the plan period (the latter through a safeguarded land designation) as shown in the plan at Appendix 1.

### Council's appraisal of suitability, availability and viability Site Allocation OS3

- 9.6 Peel has undertaken a critique of the Council's appraisal of the proposed site allocation to the east of Culcheth (Allocation OS3) as set out in the Site Proforma Assessment Report. Comments on parts of the assessment which Peel does not agree with are provided below.
- **Green Belt:** reflecting the absence of durable boundaries along its extensive boundary with the retained Green Belt, Peel considers that Site Allocation OS3 site makes a strong contribution to the Green Belt, rather than a weak contribution as claimed by the Council.
  - **Landscape and visual:** relative to land north east of Culcheth proposed for development by Peel, the selected Site Allocation OS3 has a high level of

sensitivity to change in landscape and visual terms based on its location within Character Type 2B – Mossland Landscape – Holcroft & Glazebrook Moss, which differs from that of Peel’s site and which is more sensitive to change.

#### **Site allocation OS3 – other considerations**

- **Connectivity and integration with the settlement:** Site Allocation OS3 does not achieve an effective integration into the existing built environment of Culcheth. It is evidently peripheral to the main settlement area and located beyond an area of playing fields and Culcheth Secondary School which mark the transition between the main built up area of Culcheth and expanses of Green Belt and countryside beyond. It will introduce a dense, urban form of development into an otherwise open area. It wouldn’t represent a natural, organic outward expansion of the settlement area being significantly isolated and disconnected from it. This approach is not conducive to the objective of achieving well-designed places through the plan-making process as required by NPPF.

#### **Peel’s site north east of Culcheth**

9.7 As noted, Peel has put forward a proposal for the release of land from the Green Belt and allocation for housing development during the plan period, safeguarded land to meet development needs beyond the plan period alongside strategic areas of open space. The site’s key attributes and benefits which justify its allocation for development are considered below:

- **Green Belt:** the proposed Country Park and open space designation will provide long term durable boundaries to the Green Belt to the north and east of the proposed developed area. In this instance, the site makes, at most, a moderate contribution to the Green Belt and thus a lesser contribution than the proposed allocated site to the east of Culcheth.
- **Consideration of benefits:** the proposal will deliver unique transport and open space benefits to the settlement of Culcheth which no other site can. These can be secured through the policy allocation.
- **Landscape and visual impacts:** The site falls within defined Landscape Character 1: Undulating Farmland which is considered to be less sensitive to development than Landscape Character Type 2, within which the selected site allocation falls.
- **Connectivity with the settlement:** the proposal represents a natural and logical outward expansion of the settlement. It is effectively knitted into the main urban area, having a significant interface with it and providing numerous points of connection to achieve an effective and sensitive integration with the existing urban area. It would not offend the established character and appearance of the settlement as one appreciates it from key arterial routes and entry routes into Culcheth
- **A long term development opportunity:** Peel’s proposal provides the benefit of presenting a strategy for the long term and managed growth of the settlement, through an initial plan period development and then a natural and logical second phase of development beyond the plan period. The proposed PSLP allocation does not present an equivalent opportunity to build on the existing development

in a sustainable manner. The further outward expansion of allocation OS3 would take in open Green Belt land and reinforce the development's physical disconnection and isolation from the main settlement area.

**Taking these points together, it is clear that Peel's proposed development north east of Culcheth presents a more sustainable allocation to deliver both the plan period and post-plan period needs of the settlement compared to the selected site allocation OS3. Should the PSLP continue to be progressed based on a strategy of incremental growth within the Outlying Settlements, Peel's site north of Culcheth should be allocated for the development of 300 dwellings during the plan period (eastern parcel) plus a further 300 dwellings beyond 2037 through a safeguarded land designation (western parcel).**

### **Lymm**

- 9.8 Peel's proposal for the allocation of land of Rushgreen Road (east of Tanyard Farm) is summarised in section 8. This proposal includes the allocation of land with a capacity for 112 dwellings during the plan period. Land at Tanyard Farm, which benefits from planning permission for 64 dwellings, secured at appeal, would logically be included in the same allocation, providing a total capacity of 176 dwellings across the proposed allocation (112 + 64 dwellings).
- 9.9 As a consequential amendment, land to the south of Peel's proposed site would also be released from the Green Belt and could be either allocated as safeguarded land to meet development needs beyond the plan period (with a capacity for a further 112 dwellings) or designated as a green wedge, or similar, if it were deemed necessary to keep this land open. This is shown in the plan at Appendix 2.

### **The case for an amended approach to Parcel LY16**

- 9.10 Peel's proposal presents an alternative approach to the treatment of land within Green Belt Parcel LY16, as defined through the Council's 2016 Green Belt Assessment. Peel's proposal now includes only the partial release of land within Green Belt Parcel LY16. It has previously presented a proposal for the full release of this area. The Council's selected draft allocation OS7 is also located in Parcel LY16 comprising land immediately to the west of Peel's site.
- 9.11 To the extent that it is necessary or desirable to retain an open area in this location, creating such a gap between the canal and the southern extent of development is an effective way of achieving this, representing a continuation of the principle established through the aforementioned appeal proposal. Further releases must be considered against this baseline.
- 9.12 In this context, and having regard to both the appeal Inspector's advice and the prominence and visibility of land within this area, the first preferred area of Green Belt release would be land to immediate east of the appeal site. Development here would 'tuck in' behind the appeal development utilising an area of physically well contained 'back land' which is not generally visible from public view points. From a Green Belt point of view the site proposed for release by Peel would be the least sensitive and its development would follow the principle recently established on appeal.

- 9.13 Land to the west of the appeal site is also more sensitive to development in this regard, being significantly more prominent and visible and having an interface (albeit limited) with Rushgreen Road and located where residential development between the northern extent of the parcel and Rushgreen Road is more sparse. This part of the parcel is significantly more exposed thus the development of this area would have a greater impact on openness.
- 9.14 To the extent that it desirable to restrict the extent of Green Belt release within Parcel LY16, a sequential approach to the selection of land should be taken, starting with land which is least sensitive to release from the Green Belt impact point of view. Any first release would logically be established around and as an extension to the consented appeal scheme, building on this. In this context, any such extension should take place to the east of the appeal scheme as first preference, with other land, including land to the west, only be justified if it is desirable to increase the total amount of land to be released and developed within Parcel LY16.
- 9.15 Notwithstanding this, it is noted that Green Belt Parcel LY16 makes an overall weak contribution to the Green Belt, as recorded in the Council's Green Belt Assessment and therefore very limited harm to the Green Belt would result from its full release of this area. In more broad terms, LY16 is a suitable site for the release of land from the Green Belt therefore.

**Council's appraisal of suitability, availability and viability of selected site allocations**

- 9.16 Peel has carried out a critique of the Council's appraisal of the other proposed site allocations in Lymm (allocations OS5, OS6 and OS8) as set out in the Site Proforma Assessment Report. Comments are provided below.
- **Green Belt:** a Green Belt contribution of moderate/strong should be recorded for Site Allocation OS5 and OS8.
  - **Sustainability of location:** Site Allocations OS5, OS6 and OS8 are not well related to Lymm Neighbourhood Centre, in comparison to land within Green Belt Parcel LY16. This should be reflected in the appraisal of their suitability
  - **Flood risk:** Site Allocation OS6 is located entirely within Flood Zones 2 and 3 whilst 50% of Site Allocation OS5 is located in Flood Zone 2. Accordingly, their allocation in favour of sites in Flood Zone 1 cannot be justified in the context of the NPPF sequential test
  - **Landscape and character:** Site Allocations OS5, OS6 and OS8 are all prominently located along key arterial roads into the town, being situated at gateway locations to the settlement. These sites would be visually prominent from public view points and thus have an impact on defining, influencing and changing the character of the settlement as a result
- 9.17 As a result of the above, the Council's suitability scoring proposed of allocations OS5, OS6 and OS8 should be presented as follows.

**Green Belt**

- Site allocation OS5: **Amber** reflecting a moderate Green Belt contribution

- Site allocation OS6: **Yellow** reflecting a weak Green Belt contribution
- Site allocation OS8: **Amber** reflecting a moderate Green Belt contribution

***Proximity and accessibility to Lymm Centre***

- Site allocation OS5: **Red** reflecting that the site is more than 1.5 km from Lymm Centre
- Site allocation OS6: **Red** reflecting that the site is more than 1.5 km from Lymm Centre
- Site allocation OS8: **Red** reflecting that the site is more than 1.5 km from Lymm Centre

9.18 The Council’s assessment accurately notes that site allocations OS5 and OS6 lie in Flood Risk Zones and give them a scoring which reflects this. However, the assessment fails to give this sufficient weight as a negative indicator of suitability in the context of NPPF and the application of the sequential test. This is considered further below.

**Assessment of Parcel LY16 and Peel’s proposed site allocation**

9.19 As noted, Peel has put forward a proposal for the release of land from the Green Belt and allocation for housing development during the plan period and potential safeguarded land to meet development needs beyond the plan period. Peel’s proposal presents an alternative strategy for the release of land within defined Green Belt Parcel LY16.

9.20 Reflecting that the Council has not assessed the land proposed by Peel independently of Parcel LY16, comments below are provided on the Council’s assessment of Parcel LY16, as a potential development allocation.

9.21 Peel’s assessment of the Council’s appraisal comprising Green Belt Parcel LY16 as set out in the Site Proforma Assessment Report demonstrates that the suitability scoring for this site should be revised as follows:

***Green Belt***

- Parcel LY16: **Yellow** reflecting a weak Green Belt contribution

***Proximity and accessibility to Lymm Neighbourhood Centre***

- Parcel LY16: **Amber** reflecting that the site is between 1k and 1.5km from Lymm Centre

***Contamination***

- Parcel LY16: **Green** reflecting that the consented appeal scheme will secure the remediation of the site

9.22 The revised assessment demonstrates that Parcel LY16 considered as a single proposed development site, and including Green Belt and Centre proximity in the suitability process, would, in overall terms, achieve a better suitability score than the other three sites:



- Parcel LY16 would score better than site OS5 on **seven** grounds and worse on **four** grounds.
- Parcel LY16 would score better than site OS6 on **six** grounds and worse on **three** grounds.
- Parcel LY16 would score better than site OS8 on **six** grounds and worse on **three** grounds.

9.23 It is also important to recognise that as part of a balanced assessment of candidate sites, some indicators of suitability are more important than others and should be given more weight in this process. For example, the long term endurance of the Green Belt is a strategic objective of the PSLP (Objective W2) and thus to the extent that a candidate allocation makes a lesser Green Belt contribution than others, this should be given very significant weight in the planning balance. In this context it is noted that Parcel LY16 makes an overall weak contribution, to which significant positive weight should be attributed for the reasons stated.

9.24 A similar principle applies to flood risk. In this instance, the application of the sequential approach to site selection, as required in accordance with paragraphs 157 and 158 of the NPPF, justifies the allocation of land within Parcel LY16 in preference to site allocations OS5 and OS6.

9.25 The issue of Flood Risk Zoning is not a small matter just to be considered in the planning balance, rather express justification for the selection of sites in Flood Zones 2 and 3 over sites in Flood Zone 1 (which would include Parcel LY16) is needed in accordance with paragraphs 157 and 158 of the NPPF. Any suggestion that sites OS5 and OS6 may be marginally more sustainable than land within Parcel LY16 on other grounds is insufficient to justify their allocation in this context.

9.26 Peel has presented evidence that further land within Parcel LY16 would be developable during the plan period (including having regard to access and land ownership). In this context the Council has presented no evidence to justify the selection of sites in Flood Zones 2 and 3 over otherwise suitable, and developable, land within Flood Zone 1.

9.27 Ensuring that development is directed to sites where the risk of flood is low is clearly also a strategic issue for the plan, to be given significant weight in the site appraisal process.

#### **Other determining factors in the selection of sites for allocation**

9.28 Whilst the pro-forma scoring exercise considered above has informed the selection of sites for allocation, this has been supplemented by more qualitative considerations to determine which sites should be selected. Such matters were considered through a workshop session on each site, a summary of which is provided in each site pro-forma. In some instances this raises issues which don't come across through the scoring exercise presented above.

9.29 In respect of land off Parcel LY16 two critical issues arise through the workshop sessions which are evidently determining factors in the decision not to allocate this site

in full. Peel does not accept the conclusions drawn in respect of either of these matters:

- **Access and ownership constraints:** work undertaken by Peel's transport consultants and submitted with the Development Prospectus for its proposals show that the land to the east of the appeal site can be accessed safely via the existing residential road network. The suggestion that there is no agreed means of access through the appeal site into land to the east and that this would therefore prevent more of Parcel LY16 being developed is incorrect. There are no access and associated ownership constraints to the development of the wider Parcel LY16
- **Character impact:** Peel does not accept there is a material effect of the character of the settlement that should have a bearing on the suitability of this parcel of land for development and any suggestion of adverse character impact, either in absolute or relative terms, is wholly unsubstantiated. The Council has not presented a townscape or built environment character assessment to enable such a conclusion to be drawn. The Council's assessment considers landscape character but concludes that the development of the full Parcel LY16 would result in a 'moderate change.' This is the same level of change that the Council has identified as resulting from the development of proposed allocations OS5, OS6 and OS8. There is nothing between the sites in this regard and by reference to the Council's own evidence. The site's relative containment means that its potential impact on the area's character is limited, though it is noted that a carefully considered design will be needed to ensure an appropriate interface with the Bridgewater Canal. This can be achieved through a considered design approach which is sensitive to the potential prominence of the development from this public, albeit lesser used, view point.

In contrast, proposed allocations OS5, OS6 and OS8 are all prominently positioned along key arterial roads into the town, being sited at gateway locations. Whilst smaller in scale, these developed sites would clearly be more visible and have a greater effect on defining, influencing and changing the character of the settlement as a result. To the extent that the sites being considered could have a detrimental impact on the settlement's character, this impact would be felt more so through the development of allocations OS5, OS6 and OS8.

Taking these points together, it is evident that Peel's proposed development off Rushgreen Road (east of Tanyard Farm) presents a more sustainable allocation to deliver the plan period needs of the settlement compared to the selected site allocations OS5, OS6, OS7 and OS3. Should the PSLP continue to be progressed based on a strategy of incremental growth within the Outlying Settlements, Peel's site at Lymm should be allocated for the development of 112 dwellings during the plan period with the potential for a further 112 dwellings beyond 2037 through a safeguarded land designation to the south.

### Croft

- 9.30 Peel's submitted Development Prospectus for land off Lady Lane, Croft presents an alternative option for the development of this site, comprising a plan period allocation of 83 dwellings with the balance of the site safeguarded to meet development needs beyond the plan period (with a capacity of 112 dwellings). This has been presented to enable a version of Peel's proposal, consistent in scale with the allocation proposed in Croft through the PSLP, to be considered against the selected site on a like-for-like basis in the context of a the PSLP strategy being maintained.

### Council's appraisal of suitability, availability and viability of Allocation OS2

- 9.31 Peel has undertaken a critique of the Council's appraisal of the proposed site allocation to the east of Culcheth (Allocation OS2) as set out in the Site Proforma Assessment Report. This critique demonstrates that the site's suitability scoring should be revised as follows:

- '*A physical point of access into the highway*' should be amended from a yellow score to an orange score
- '*Promote brownfield development*' should be amended from a yellow score to an orange score

### Site allocation OS2 – other considerations

- **Existing use:** it is highly likely that the business which currently occupies the site will seek new premises when displaced from its existing site. The business's occupation of its current site is a result of such a displacement from land to the west around Deacons Close. Given the nature of the use, the business is again likely to seek a site within the Green Belt upon displacement from its current site. As such, whilst the proposed allocated site is partly brownfield land, the overall net impact on the Green Belt of the site's development is likely to be the same as if the site were entirely greenfield as a new site, most likely within the Green Belt, will need to be identified for the development of replacement premises for the existing business.
- **Green Belt:** reflecting the site's significant interface with the wider expansion of Green Belt and the weakness of these boundaries, the site should be recorded as making a strong contribution to the Green Belt.

### **Peel's site at Lady Lane**

9.32 Peel's critique of the Council's appraisal of its proposed development site at Lady Lane as set out in the Site Proforma Assessment Report demonstrates that the site's suitability scoring should be revised as follows:

- '*Remediation opportunity*' should be amended from an orange score to a yellow score
- 'Impact on wildlife sites, local nature reserves, RIGs, potential wildlife sites etc' should be amended from an orange score to a yellow score
- '*A physical point of access into the highway*' should be amended from an orange score to a green score

9.33 Further, Peel's site at Croft should be recorded as making a weak contribution to the Green Belt reflecting its physical form and general enclosure by the existing urban area along most of its boundaries. This lesser Green Belt contribution should then be given due weight in the suitability assessment process.

9.34 Taking the above into account, Peel's proposal would achieve a better score in respect of three suitability criteria and a worse suitability score in respect of two criteria based on an objective appraisal as presented by Peel.

### ***Lady Lane - other considerations***

- **A long term development opportunity:** Peel's proposal also provides the benefit of presenting a managed strategy for the long term growth of the settlement, through an initial plan period development and then a natural and logical second phase of development beyond the plan period utilising land to west. The proposed PSLP allocation does not present an equivalent opportunity to build on the existing development in a sustainable manner. The further outward expansion of allocation OS2 would take in open Green Belt land and reinforce the development's physical disconnection and isolation from the main settlement area.

**Taking these points together, it is clear that Peel's proposed development at Lady Lane presents a more sustainable and more suitable allocation to deliver both the plan period and post-plan period needs of the settlement compared to the selected site allocation OS2. Should the PSLP continue to be progressed based on a strategy of incremental growth within the Outlying Settlements, Peel's site at Lady Lane should be allocated for the development of c83 dwellings during the plan parcel plus a further 112 dwellings beyond 2037 through a safeguarded land designation.**

### **Hollins Green**

9.35 Peel's submitted Development Prospectus for land off Manchester Road, Hollins Green presents an alternative option for the development of the site comprising a plan period allocation of c93 dwellings with the balance of the site safeguarded to meet development needs beyond the plan period (with a capacity of 199 dwellings). This has been presented to enable a version of Peel's proposal, consistent in scale with the allocation proposed in Hollins Green through the PSLP, to be considered against the

selected site on a like-for-like basis in the context of in the context of a the PSLP strategy being maintained.

**Peel's site at Manchester Road**

9.36 Peel's assessment of the Council's appraisal of its proposed development site at Manchester Road as set out in the Site Proforma Assessment Report demonstrates that the suitability scoring for this site should be revised as follows:

- **Air quality impacts** should be amended from an orange score to a yellow score
- **Loss of high quality agricultural land** should be amended from an orange score to a yellow score
- **Capacity of the landscape to accommodate development** should be amended from an orange score to a yellow score

9.37 It is also apparent that some indicators of suitability are more important than others. The long term endurance of the Green Belt is a strategic objective of the PSLP (Objective W2) and thus to the extent that a candidate allocation makes a lesser Green Belt contribution than others, this should be given very significant weight in the planning balance.

9.38 Taking the above into account, Peel's proposal would achieve a better score than the selected Site Allocation OS 4 in respect of two suitability criteria and a worse suitability score in respect of one criterion based on an objective appraisal as presented by Peel.

9.39 Further Peel's land at Manchester Road is identified as making a weak Green Belt contribution and, based on Peel's appraisal in Paper 4, the selected allocation (OS4) makes a moderate Green Belt contribution. Green Belt impact should be given additional weight in the assessment of site options given that the long term endurance of the Green Belt is a strategic objective of the PSLP (Objective W2). This would weigh substantially in favour of Peel's land when considered on a comparative basis.

**Taking these points together, it is clear that Peel's proposed development at Manchester Road presents a more sustainable and more suitable allocation to deliver both the plan period and post-plan period needs of the settlement compared to the selected site allocation OS4. Should the PSLP continue to be progressed based on a strategy of incremental growth within the Outlying Settlements, Peel's site at Manchester Road should be allocated for the development of 93 dwellings during the plan period plus a further 199 dwellings beyond 2037 through a safeguarded land designation.**

## 10. Other matters (Paper 5)

- 10.1 Paper 5 presents a technical critique of the Council’s Sustainability Appraisal (AECOM, March 2019) and Local Plan Viability Report (BNP Paribas, March 2019), before providing representations to a number of detailed policies within the PSLP and presenting two further opportunities for development; at Statham Meadows and North West Croft.

### **Technical Critique of the Council’s Sustainability Appraisal**

- 10.2 A detailed review of the approach advanced to date by the Council in respect of the Sustainability Appraisal<sup>4</sup> (“the 2019 SA”) produced in support of the PSLP has been undertaken. This should be read alongside Peel’s comments in respect of the definition and testing of housing growth and distribution scenarios as considered through Papers 2 and 3. This review has identified a number of deficiencies and concerns with the 2019 SA, which can be summarised as follows:
- (a) There is no evidence within the 2019 SA to justify the selection of 10% incremental growth within the Outlying Settlements as the most sustainable option, with insufficient testing of reasonable alternatives to that growth undertaken throughout the preparation of the PSLP.
  - (b) As a result of the above, the Council has failed to correctly identify the reasonable alternatives for growth and therefore the sustainability benefits and impacts from growth in the Outlying Settlements and, as a result of the absence of any SA work, has failed to identify the negative impacts associated with the proposed strategy which is to constrain growth in the Outlying Settlements.
  - (c) Within the 2019 SA, the Council has provided unsound reasons for the selection/rejection of reasonable alternatives (and specifically spatial option F3 – High growth and increased dispersal to the outlying settlements) within the 2019 SA.
- 10.3 As a result of these concerns, Peel is concerned that the SA and, therefore, the PSLP is not sound as the proposed approach is not justified. In order to rectify the identified deficiencies with the SA, it is recommended that the Council undertakes the following actions:
- The different options for growth in the Outlying Settlements should be separated from that proposed for Warrington and clearly articulated with the necessary supporting evidence base.
  - These growth options should then be tested to the same level of detail against the SA framework to clearly articulate the sustainability benefits and allow the identification of the preferred growth option.

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<sup>4</sup> Warrington Local Plan Review Pre-Submission – Sustainability Appraisal: SA Report (AECOM, March 2019)

- This assessment material should be published for consultation to allow all stakeholders to identify and comment upon the growth options for the Outlying Settlements.

### Technical Critique of the Local Plan Viability Report

- 10.4 A technical critique of the Council’s Local Plan Viability Assessment<sup>5</sup> (LPVA), which is the primary document used to inform the residential and commercial policy requirements set out in the PSLP, has been undertaken and is provided at Appendix 1 to Paper 5 of Peel’s representations.
- 10.1 The critique raises a number of concerns of errors, inconsistencies and inappropriate assumptions adopted in the Council’s LPVA. The cumulative impact of the issues identified leads Peel to have substantive material concerns in respect of the robustness of the viability evidence for the PSLP as presented within the LPVA, which mean that policies of the PSLP based upon the LPVA are unsound.
- 10.2 In order to overcome these concerns, alterations to the Council’s methodology are requested to ensure that the Council’s evidence is robust and justified in the context of the soundness tests of the Framework.
- 10.3 Peel requests that the Council instructs their viability advisors to re-draft the LPVA with full reassessment of appraisal methodology required to correct the errors identified and to ensure that the assumptions and results of viability testing reflect market expectations in order that policy costs applied are realistic, deliverable, and evidenced in accordance with the NPPF and Planning Practice Guidance for Viability (PPGV).

### Comments on Policies Relating to Objectives W1, W2, W4, W5 and W6

- 10.4 Sections 4 – 8 of Paper 5 provide detailed comments on a number of other PSLP policies. These comments are summarised in the table below.

| Policies Relating to Objective W1               |   |
|---|---|
| Policy DEV2:<br>Meeting Housing Needs           | Peel supports the principle of the policy, which seeks to deliver a range of housing to meet identified needs; those ambitions align with national planning policy and guidance.<br><br>It will be important to ensure that sufficient flexibility is provided within the policy wording (particularly part 7) to enable the housing mix, types and tenures on a particular site to be determined at the time that an application is brought forward and in response to updated needs studies / assessments, so as not to inhibit delivery. |
| Policy DEV4:<br>Economic Growth and Development | Policy DEV4, amongst other things, identifies land at Port Warrington (which forms part of the Council’s wider proposals for Warrington Waterfront) for release from the Green Belt and allocation as a new Employment Area. Peel fully supports this   |

<sup>5</sup> Warrington Local Plan Viability Assessment (BNP Paribas, March 2019)

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proposed allocation, which reflects the clear evidence to support the need for the further growth and expansion of Port Warrington which will enable the Port to attract new occupiers, secure inward investment and maximise the economic potential of the Manchester Ship Canal and existing rail links.

Further detail is provided within Peel’s representations in relation to Warrington Waterfront, which provide further support for draft Policy MD1 and suggested amendments to the wording of the draft policy to ensure that it aligns with the ambitions and objectives for the delivery of the proposals within Warrington Waterfront.

#### Policies Relating to Objective W2

Policy GB1: Green Belt

Peel agrees that the Council has demonstrated that there are ‘exceptional circumstances’ to warrant the review of the Green Belt boundaries in the Borough.

Peel supports the release and allocation of land at Warrington Waterfront (including Port Warrington) (part 3a of Policy GB1) and the South West Urban Extension (part 3c of Policy GB1). Peel has been promoting land within both of these locations for employment and residential development, respectively.

As set out in detail in Paper 4 of Peel’s representations, a number of the sites within the named Outlying Settlements that the Council proposes for allocation in the PSLP do not represent the most sustainable development options within the subject settlement compared to reasonable alternatives and, therefore, these allocations cannot be justified.

Peel objects to the Council’s position that no safeguarded land is needed, as set out in detail within Papers 2 and 3. The PSLP is unsound as it does not seek to make provision for safeguarded land to ensure that the Green Belt endures over the long term and, therefore, is not consistent with national policy. In order to address this unsoundness, safeguarded land should be allocated capable of meeting needs beyond 2037, and distributed on a proportionate basis across the Borough.

#### Policies Relating to Objective W4

Policy INF1: Sustainable Travel and Transport

Peel supports the objective of Policy INF1 in seeking to improve the safety and efficiency of the transport network, tackling congestion and improving air quality, promoting sustainable transport options, reducing the need to travel by car and encouraging healthy lifestyles.

The policy wording (particularly part 3(c)) should ensure that any contributions towards public transport improvements are related in scale to the impacts that are expected to arise from the proposed development and are necessary to make the proposals acceptable in planning terms, in order to comply with the CIL Regulations and national policy tests for planning

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|---|--|
|   | obligations.   |
| Policy INF2:<br>Transport<br>Safeguarding | <p>Peel recognises that significant infrastructure investment is needed to realise the full potential of the development opportunities identified within the PSLP, including within the Town Centre, Warrington Waterfront, the Garden Suburb and the SWUE.</p> <p>Part 2(d) of the draft policy confirms that land will be safeguarded for the Warrington Western Link, which will provide enhanced connectivity and resilience to Warrington’s highway network and support housing and economic growth. Peel continues to support the recommended route for the delivery of the Western Link road and, as a significant landowner in this area, is committed to continuing to work in partnership with the Council to deliver this critical infrastructure. Proportionate and affordable contributions towards the provision of the Western Link should be sought on relevant developments.</p> <p>Part 2b of the policy seeks to safeguard land for a new or replacement high-level crossing of the Manchester Ship Canal (MSC). Peel is supportive of the provision of either a new or replacement crossing in the proposed location, and Peel Ports would welcome a more detailed discussion with the Council to understand the Council’s longer-term aspiration and to ensure the integrity of the Manchester Ship Canal is protected.</p> |
| <b>Policies Relating to Objective W5</b>  |  |
| Policy DC1:<br>Warrington’s<br>Places     | <p>Detailed comments on the proposed spatial strategy, including the case for further growth in the Outlying Settlements, are provided within Paper 3 of Peel’s representations. In summary, Peel concludes that the Council’s selection of a spatial strategy, defined by incremental growth within the Outlying Settlements, is based on unsubstantiated and incomplete evidence and a flawed approach to the appraisal of spatial options.</p> <p>Part 20 of draft Policy DC1 encourages the preparation of Neighbourhood Plans to provide greater detail in relation to development priorities specific to particular areas and local communities. Additional text should be added to this part of the policy to confirm that policies within Neighbourhood Plans should be in general conformity with the strategic policies of the Local Plan and reflect, as a minimum, the outcomes of Papers 2 and 3 in relation to the acceptable scale of development for those Outlying Settlements.</p>   |
| Policy DC2: Historic<br>Environment       | <p>Amendments to the detailed policy wording are required in order to ensure that the policy reflects national policy and the statutory duties.</p> <p>In addition, it is requested that additional policy wording is provided to confirm that the local list criteria and draft list will be subject to public consultation in accordance with Historic</p>   |

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England Advice Note 7 (2016): Local Heritage Listing.

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Policy DC3: Green Infrastructure      Part 6 of draft Policy DC3 requires an ecological net gain to be achieved on all sites. This requirement goes beyond the provisions of national policy, which encourages local authorities to “*pursue opportunities*” for securing net gains, rather than requiring net gains on all sites. Part 6 of Policy DC3 is, therefore, not sound.

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Policy DC5: Open Space, Outdoor Sport and Recreation Facilities      Peel supports the objectives of Policy DC5; however, the clarity (and, therefore, effectiveness) of the policy could be enhanced through:

- Clarifying whether the provision of or contributions towards all forms of open space applies only to ‘family dwellings’.
- Clarifying that new development will only be expected to meet needs generated by the development which cannot be accommodated within existing facilities in order to ensure that any planning obligations sought comply with statutory and national policy tests.

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**Policies Relating to Objective W6**

Policy ENV2: Flood Risk and Water Management      Peel supports the objectives and intentions of Policy ENV2 which seeks to focus new development within areas at the lowest risk of flooding and does not exacerbate the risk of flooding elsewhere. This aligns with national policy.

Part 14 of the draft policy relates to the provision of site-wide drainage infrastructure on large development sites / allocations. Whilst the intention of this policy element is supported in principle, it will be important to ensure that the early phases of housing delivery on large sites are not unduly constrained or expected to carry the costs associated with site-wide infrastructure, especially where the wider site is in multiple ownerships.

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Policy ENV7: Renewable and Low Carbon Energy Development      Peel supports the objectives of Policy ENV7 which seeks to reduce carbon emissions from new development.

However, Peel is concerned that the draft policy wording does not meet current technical thinking and recent announcements from the Government (including in relation to the Future Homes Standard) because it promotes the use of decentralised energy systems (typically gas fired) in strategic housing developments which will add significant cost to development and – more importantly – does not meet the Government’s target for all new homes to be ‘gas free’ by 2025.

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**Statham Meadows**

10.5 Peel continues to promote a site at Statham Meadows for employment uses and / or as a Motorway Service Area (MSA) given its proximity to Junction 21 of the M6 motorway.

The site extends to c. 13 ha and has a frontage to the A57; a key route connecting Manchester and Warrington which would give the site significant advantages in accommodating logistics or manufacturing uses and / or lend itself to a MSA, ensuring users of these busy stretches of strategic road have access to good quality welfare and break facilities as critical to the safe operation of the road network.

- 10.6 Indeed, the Secretary of State for Transport has previously confirmed (in July 2002) that an MSA at Statham Meadows (Junction 21) would have advantages over a potential MSA at Junction 22 given the advantage of the Junction 21 proposals to serve the needs of both long and short distance travel<sup>6</sup>.
- 10.7 Whilst both schemes were ultimately refused due to a lack of evidenced need at that time, national policy relating to the provision and spacing of MSAs has changed significantly since that time.
- 10.8 Peel is aware of emerging proposals by the Extra MSA Group to submit an outline planning application for a new MSA at Junction 11 of the M62, to the north east of Warrington. The pre-application information published to date<sup>7</sup> indicates that there is considered to be sufficient demand for further MSA provision on this part of the network.
- 10.9 The existing motorway junction adjacent to Statham Meadows comprises ‘dumb-bell’ roundabouts located to the east and west of the mainline of the M6 motorway. Both roundabouts connect with the A57 Manchester Road with a two-lane dual carriageway connecting the two. Access to the site can be taken from an improved entry to the eastern roundabout with consequential amendments to the westbound A57 approach. Footway connections can also be provided.
- 10.10 In highways and transport terms, the site can be accessed satisfactory and safely, residual traffic impacts will not be severe and the site will be sustainable and accessible.
- 10.11 In the context of an evidenced need, the site would be a suitable allocation for MSA and / or for employment development and should be considered as such through the Local Plan.

### **Land to the North West of Croft**

- 10.12 Papers 1-4 set out a case for allocating a number of additional sites located within the named Outlying Settlements of the Borough for housing development during and beyond the plan period (the latter as safeguarded land), above and beyond those proposed by the Council through the PSLP. These sites have been promoted by Peel over a number of years, and full Development Prospectuses and an associated technical evidence base in respect of each of the allocation proposals are submitted as part of Peel’s representations demonstrating that the proposals represent sustainable and deliverable development opportunities.

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<sup>6</sup> PINS ref. APP/M0655/V/00/000199 and 200

<sup>7</sup> <https://www.warringtonservices.co.uk/>

- 10.13 An additional Development Prospectus and associated technical evidence base is provided in respect of a further site owned and controlled by Peel at North West Croft.
- 10.14 Whilst Peel's representations do not directly support the allocation of a site of the scale of North West Croft in this location at this time, the Development Prospectus and associated evidence base demonstrate that this site is deliverable for residential development and is the control of an experienced developer.
- 10.15 In the event of an unmet housing requirement in the Outlying Settlements, the site would represent a sustainable development option. This site is formally submitted to the Local Plan as such and should therefore be considered as a development option by the Council.
- 10.16 The Development Prospectus demonstrates how the site could be developed to provide a new sustainable community to the north west of Croft, capable of accommodating between c. 1,500 – 1,800 dwellings. The concept masterplan presented demonstrates how the development of the site could secure a significant level of housing over the plan period (and potentially beyond), in addition to strategic level infrastructure such as a new secondary school, small scale retail and commercial uses and a new 'village green'.
- 10.17 Overall, it is concluded that the site represents a sustainable opportunity capable of accommodating a desirable and high quality residential development in a substantial parkland setting. It presents the opportunity to create a new community, but one which is integrated with the existing settlement of Croft.

**Appendix 1: Land north east of Culcheth –  
proposed policy designations**

**Key**

-  Proposed site boundary
-  Proposed Green Belt boundary
-  Area to be designated as Country Park through policy allocation
-  Area to be allocated for development during the plan period
-  Area to be designated as safeguarded land for future development
-  Area to be designated as Open Space through policy allocation



**Warrington Local Plan Sites**





**North East Culcheth  
 Proposed designations and allocations plan**

Drwg No: 630DC-23  
 Drawn by: SR  
 Rev by:  
 QM Status: Checked  
 Scale: NTS

Date: 10.06.19  
 Checker: SR  
 Rev checker:  
 Product Status:  
 Issue

**Appendix 2: Land within Green Belt Parcel LY16  
(Lymm) – policy designations**

Key

-  Green Belt parcel LY16 priority land to be released from the Green Belt
-  Area proposed by Peel to be allocated for development during the plan period
-  Area proposed by Peel to be designated as safeguarded land for future development or Green Wedge
-  Consented appeal scheme

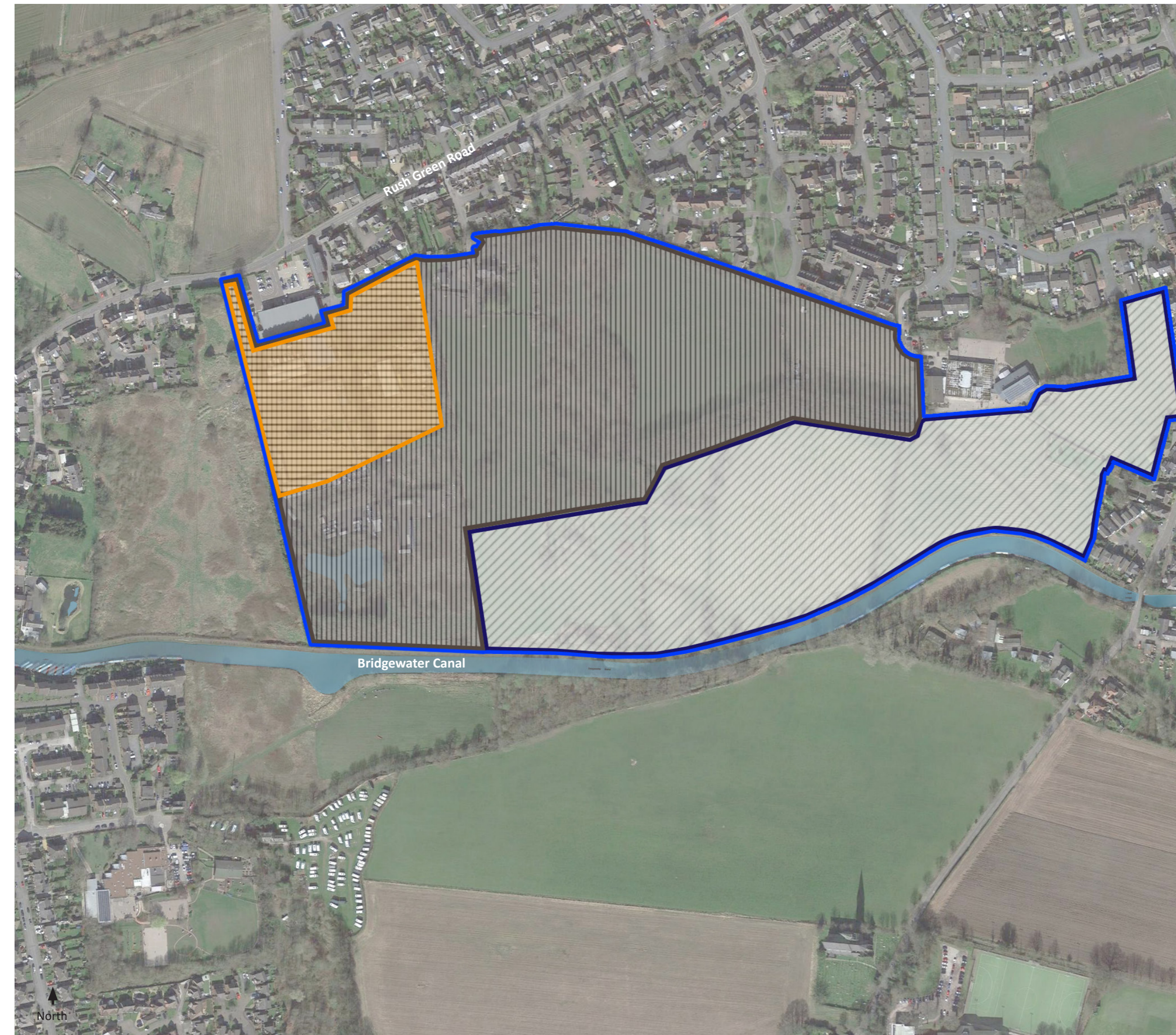


## Land off Rushgreen Road Lymm, Warrington

Proposed designations and  
allocations

Drwg No: 630DD-18B  
Drawn by: SR  
Rev by: SR  
QM Status: Checked  
Scale: NTS @ A3

Date: 13.06.19  
Checker: SR  
Rev checker: SR  
Product Status:  
Issue





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