

Paper 3: Spatial Strategy

Representations to the Warrington Proposed Submission 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”) to the Warrington Proposed Submission Version Local Plan (“PSLP”).

Peel’s Representations

1.2 Peel’s representations are contained chiefly within a number of separate but related ‘strategic papers’. Paper 1 provides an overview of Peel’s representations to the PSLP and introduces four further papers and supporting materials. This paper (Paper 3) should be read in conjunction with the remainder of Peel’s submission and particularly Papers 1 and 2.

1.3 The full list of papers are as follows:

- Paper 1: Overview representation
- Paper 2: The proposed housing requirement and supply
- Paper 3: The spatial strategy (this paper)
- Paper 4: Outlying Settlements: site allocations
- Paper 5: Other matters

1.4 Peel has a number of land and development interests across the Borough which are detailed in Paper 1. Peel’s representations relate to these interests.

1.5 The above papers are concerned principally with Peel’s land interests in the defined Outlying Settlements of the Borough and their treatment through the PSLP. In addition, Peel is part of a consortium of landowners with an interest in the proposed South West Urban Extension site allocation (PSLP Policy MD3 relates). Peel is also owner and developer of the proposed Port Warrington allocation subject to Policy MD1 of the PSLP.

1.6 Peel has submitted separate representations to the PSLP in relation to Port Warrington and, as part of a consortium of landowners, separate representations in relation to the South West Urban Extension. These express support for these proposed development allocations.

1.7 Peel’s submission to the PSLP also includes a series of Development Prospectuses and a full suite of supporting technical reports provided in respect of its land interests in the Outlying Settlements of the Borough. This material demonstrates how these sites can be delivered for residential development in a sustainable manner over the plan period, and beyond, securing significant local benefits in the process.

1.8 The Development Prospectuses and associated technical work supplement the analysis presented in Papers 1 to 5 above and demonstrate that, in the context of the issues of

soundness revealed, the subject sites would represent sustainable development opportunities. Their allocation for development, including in some cases, the designation of part of the site as safeguarded land to meet development needs beyond the plan period, would go some way to correcting the soundness issues raised within Peel's representations.

This paper

- 1.9 Paper 3 provides a detailed critique of the spatial strategy advanced within the PSLP, reflected in Policy DEV1 of the PSLP, and the distribution of proposed residential development allocations across the Borough. It is informed by and presented in the context of Paper 2 of Peel's submission which has demonstrated that:
- There is a need to increase the PSLP annual housing requirement to a minimum of 1,100 dwellings per annum (compared with 945 as proposed);
 - There is a need to increase the PSLP flexibility allowance in relation to the housing requirement to 20% (compared with 10% as proposed).
- 1.10 When these adjustments are taken collectively this results in a need for the PSLP to make provision for a total of 26,400 homes over the plan period. This would necessitate the release of land from the Green Belt to deliver 12,674 dwellings during the plan period.
- 1.11 On this basis, additional capable of delivering 5,610 dwellings ("the headroom") over and above those proposed within PSLP needs to be released from the Green Belt to meet the plan's full housing requirements. Paper 2 illustrates that even where only one of the above adjustments are made, the requirement must be elevated to 22,680 dwellings as a minimum with this creating a need to release land capable of accommodating almost 1,900 additional homes from the Green Belt.
- 1.12 A critical consideration for the Local Plan going forward is to determine where within the Borough the headroom housing requirement should be delivered.
- 1.13 In the context of this increased housing requirement, this Paper sets out a robust justification for allocating at least a proportion of this revealed headroom to the Outlying Settlements. It demonstrates that this would not result in adverse impacts either to the main Warrington urban area or the Outlying Settlements themselves. It also stresses that, in the context of an increased overall housing requirement, the elevation of the level of housing provided for in the Outlying Settlements would in itself create benefits in terms of securing a more sustainable future for these settlements. The paper considers this reallocation on the basis that there is, on the Council's own analysis, no overriding need for any of this headroom to be directed to the main Warrington urban area.
- 1.14 In doing so, Paper 3 demonstrates that:
- The Council has failed to a sufficient range of reasonable alternatives in relation to the spatial strategy presented and assessed through the Sustainability Appraisal (SA) and the Council's Development Options and Site Assessment

Technical Report (March 2019) and particularly one which reflects a higher level of housing growth than proposed through the PSLP (see Paper 2).

- In the context of a higher housing requirement than proposed through the PSLP, which should have been presented as a reasonable alternative, there would be no overriding need for any of the additional 'headroom' housing requirement to be directed to the main settlement of Warrington, whose needs are met through the allocations proposed through the PSLP as presented. Conflict with key objectives of the PSLP around the regeneration and growth of Warrington would not arise if all or some of this headroom were directed to the Outlying Settlements.
- There has been no robust assessment of the realistic sustainable capacity of the Outlying Settlements (the point at which growth may begin to cause harm to the Outlying Settlements). Insufficient evidence is presented to demonstrate that restricting the growth of these settlements to an incremental level overall (as proposed) is a necessary control to avoid harm and that this represents a sustainable strategy for the settlements.

This is in part due to the failure to consider a more moderated version of Spatial Option 3 (that being an option of greater dispersal of development to the Outlying Settlements) as a reasonable middle ground between the constrained strategy of Spatial Option 2 (as selected) and the strategy of significant growth of the Outlying Settlements which characterises Spatial Option 3.

As a result the options as tested by the Council for the growth of the Outlying Settlements are not able to reveal, with any degree of certainty, whether the Spatial Option 2 is a reasonable strategy **relative to alternatives**.

- Notwithstanding the above, Spatial Option 3 is not satisfactorily defined in the Council's appraisal of options. Judgements are made about its adverse impacts without a consideration of the sites and settlements which may deliver growth through the implementation of this spatial option. A determination of whether and to what extent the claimed impacts will arise can only be made through an understanding of the sites which will deliver the growth. The basis on which Spatial Option 3 is rejected is flawed and un-evidenced therefore.
- Further, as related to the above point, the Council has overstated the harm which would arise from a spatial option of greater distribution of residential development across the Borough and amongst the Outlying Settlements (known as Spatial Option 3 as defined and tested by the Council) when assessing this option against others.
- The Council has failed to recognise the harm to the Outlying Settlements which will arise from capping their growth at incremental levels and has fundamentally overstated the benefits arising from permitting them to grow to such a constrained extent.
- By reference to specific sites, a level of growth within the Outlying Settlements above that proposed through the selected Spatial Option 2 can be provided

without giving rise to additional adverse impacts. Further, substantial benefits will flow from this.

- 1.15 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.
- 1.16 Building on the above points, whilst this Paper does not seek to define the optimum distribution of housing across the Borough for the purposes of the Local Plan, it concludes, through an evidenced approach, that, in the context of an increased housing requirement, a strategy of supporting **significantly above** incremental growth in a number of Outlying Settlements would represent a significantly more appropriate spatial strategy than one of constraining this to incremental growth. It demonstrates that, as a minimum, the specific additional sites identified by Peel through this Paper should be allocated in the Outlying Settlements for development during the plan period and with further land allocated as safeguarded to meet development needs beyond. The allocation of further sites on top of these within the Outlying Settlements may also be justified.
- 1.17 In this regard, Spatial Option 2, as defined, and thereafter selected as the basis for the PSLP, cannot be considered to be sustainable, having regard to reasonable alternatives drawing on robust evidence. That the PSLP's spatial strategy reflects tested Spatial Option 2 means the PSLP is not justified and is unsound as a result.

2. Overview of the PSLP Spatial Strategy

- 2.1 Peel is, in principle, supportive of a strategy which seeks to focus development on Warrington, but highlights fundamental concerns around the planned scale of provision in the Outlying Settlements of the Borough and the stark geographic imbalance between the northern and southern parts of the Borough.

Overview of the preferred Spatial Option

- 2.2 The PSLP aims to meet a proposed requirement for at least 18,900 new homes over the plan period, with a level of flexibility (10%) to allow for market choice and situations where specific sites do not come forward. It therefore seeks to identify land capable of accommodating 20,790 homes, and proposes a trajectory of development – outlined at its Appendix 1 – that could see a slightly lower total of 20,643 homes provided over the period to 2037.
- 2.3 Table 2.1 summarises how different areas are assumed to contribute towards delivering this total within the PSLP. This highlights an assumption that the proposed Garden Suburb alone accommodates a quarter of future housing growth, with the wider urban area, town centre, waterfront and South West Extension also assumed to make a significant contribution towards future supply. Only 6% of housing will be delivered on identified sites within the Outlying Settlements. An allowance is made for unidentified small sites (under the ‘other’ category), the majority of which can be expected to be delivered in the main urban area of the Borough.

Table 2.1: Components of Proposed Housing Supply (2017 – 2037)

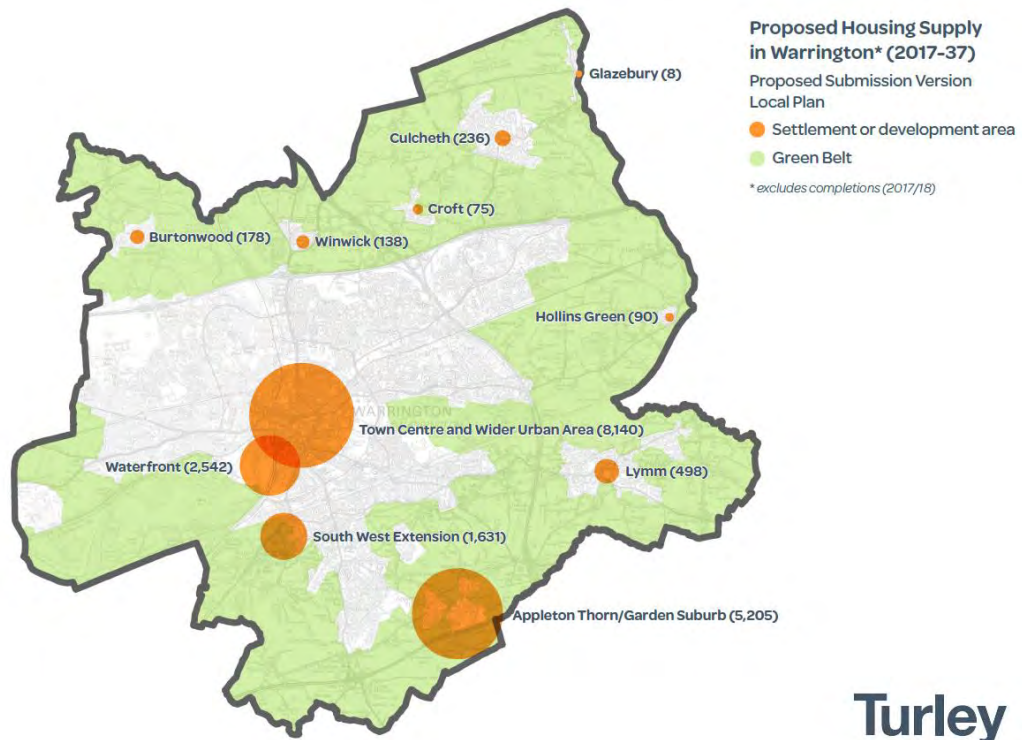
	Proposed supply	%
Garden Suburb	5,131	25%
SHLAA sites in wider urban area	4,133	20%
Town centre	4,007	19%
Waterfront	2,542	12%
South West Extension	1,631	8%
Other ¹	1,543	8%
Outlying settlements	1,297	6%
Completions to date (2017/18)	359	2%
Total	20,643	100%

Source: Warrington Borough Council, 2019

¹ Comprised of 90 homes on other SHLAA sites (outside of settlements and wider urban area); and an allowance for the delivery of 1,444 homes on small sites at a rate of 76 per annum. The prospective distribution of these sites throughout the borough has not been considered, due to an absence of available evidence

2.4 Eight outlying settlements would collectively accommodate a total of 1,297 new homes over the plan period under this trajectory, representing only 6% of future housing supply, plus any minor share of the ‘other’ unidentified sites. The assumed contribution of individual settlements ranges from circa 498 homes in Lymm, to only 8 homes in Glazebury. As shown in the following plan², this is a notably small contribution relative to the larger development areas that have been proposed in the PSLP.

Figure 2.1: Proposed Distribution of Housing Supply (2017 – 2037)



Turley

Source: Turley analysis of Warrington Borough Council data, 2019

A focus of development on Warrington

- 2.5 Peel recognises the benefits that will be realised through a focus on the development of Warrington town centre, the wider urban area, Warrington Waterfront, the Garden Suburb and the South West Extension. These locations are strategically situated and build upon existing infrastructure assets – such as the Manchester Ship Canal – and planned infrastructure, including the Western Link. As such, they will unlock the potential of Warrington, driving growth in their own right whilst addressing longstanding infrastructure constraints that are holding the Borough back. This strategy reflects and is consistent with PSLP objectives W1, W3 and W4 particularly.
- 2.6 Peel has a number of major land interests within these locations and is fully supportive of the Council’s proposals. Peel is committed to bringing its land within these locations

² The capacity of the Garden Suburb includes 74 homes at Appleton Thorn, deviating from the approach taken at Table 2.1

forward for development, but acknowledges that significant infrastructure investment is needed to realise these opportunities.

- 2.7 A separate representation has been made by a consortium of landowners (including Peel) with an interest in the proposed South West Urban Extension providing express support for this allocation. A site prospectus and associated technical evidence base have also been submitted which demonstrate the site's deliverability over the plan period. The landowners are working collaboratively to bring this site forward as evidenced through the joint submission.
- 2.8 Peel has also submitted separate representations in relation to the proposed Port Warrington development (part of the Warrington Waterfront allocation) also providing express support for this strategic designation.

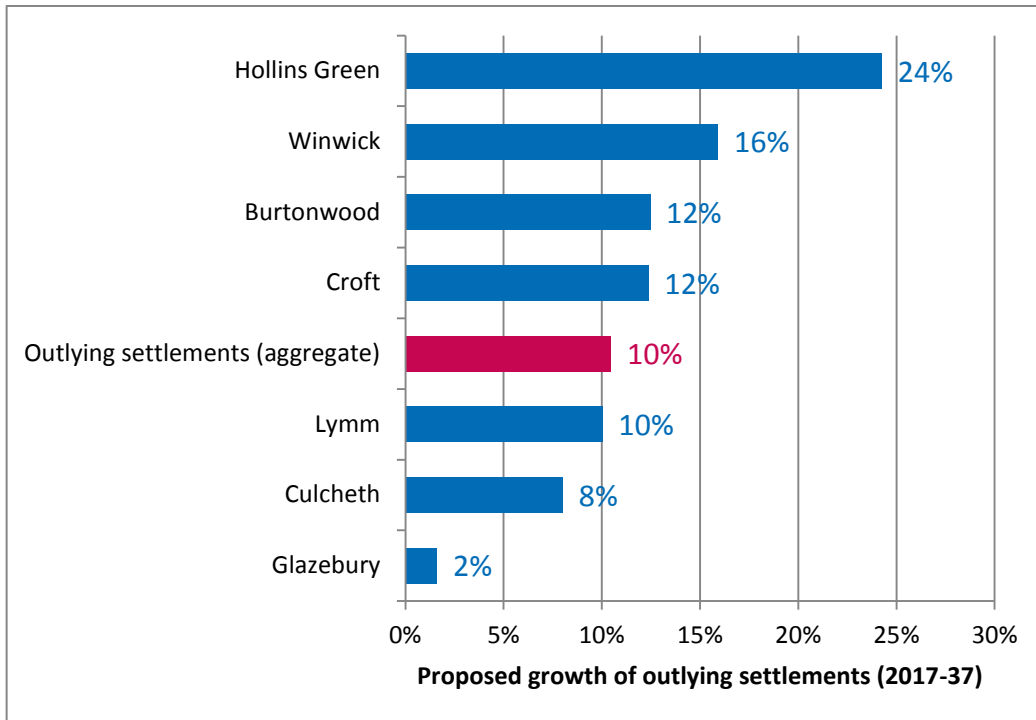
Treatment of the Outlying Settlements

- 2.9 As noted above, the Outlying Settlements are planned to make a small contribution to future housing supply, to the extent that they provide 1 in every 500 homes planned in the Borough during the latter half of the plan period. This results from the Council's favouring of an approach that attributes only *'incremental growth'* to the Outlying Settlements within the plan period, with the *'majority of Green Belt Release accommodated adjacent to [the] main urban area'*³ (tested Spatial Option 2). It is compounded by the failure to safeguard land adjacent to the Outlying Settlements to meet longer-term needs beyond 2037.
- 2.10 The need to direct a critical mass of development to the main settlement of Warrington evidently drives this strategy with, as a consequence, a restrictive approach to the growth of the Outlying Settlements. In the pursuit of this strategy, the Council has failed to consider the needs of the Outlying Settlements and their sustainable development potential in their own right. This is compounded by the constrained housing requirement proposed through the PSLP, with a limited development requirement left for the Outlying Settlements to deliver to meet their needs.
- 2.11 It is evident from a review of the supporting material to the PSLP that the justification for this approach has then been 'backfilled' by claims that a number of adverse impacts, beyond undermining the regeneration of Warrington, would also arise from anything higher than incremental growth in the Outlying Settlements (e.g. character harm, Green Belt impacts etc), thus conveniently justifying this approach.
- 2.12 When considered individually, the scale of housing provision proposed in the PSLP would actually grow some of the Outlying Settlements by as much as 24%, albeit significantly less growth is proposed in other instances. This is shown in Figure 2.2. This inherently suggests a departure from the principle of limiting growth of the individual settlements to 10% when considered individually, and an apparent willingness to allocate higher levels of growth based on infrastructure capacity and the merits of

³ Warrington Borough Council (March 2019) Development Options and Site Assessment Technical Report, paragraph 2.15

individual sites⁴, without, it is assumed, this being judged as having outweighing adverse impacts.

Figure 2.2: Proposed Growth of Outlying Settlements (2017 – 2037)



Source: Warrington Borough Council, 2017/19

2.13 Given this concession, and the availability of suitable sites, the proposal for such limited provision of housing in the Outlying Settlements is not considered to be justified, and places their sustainable futures at risk. Clearly there is an acceptance that some settlements can grow beyond a 10% level and that this would be sustainable. Thus it is unclear how the Council is able to rule out an option which goes beyond incremental growth in the Outlying Settlements, when considered on a collective basis, by reference to harm to the settlements, their character and the Borough’s Green Belt. Very clearly the Council does advocate growth significantly beyond incremental levels in a number of smaller settlements. It is therefore not a matter for a general rule. A site by site and settlement by settlement assessment is needed, an approach which Peel agree with.

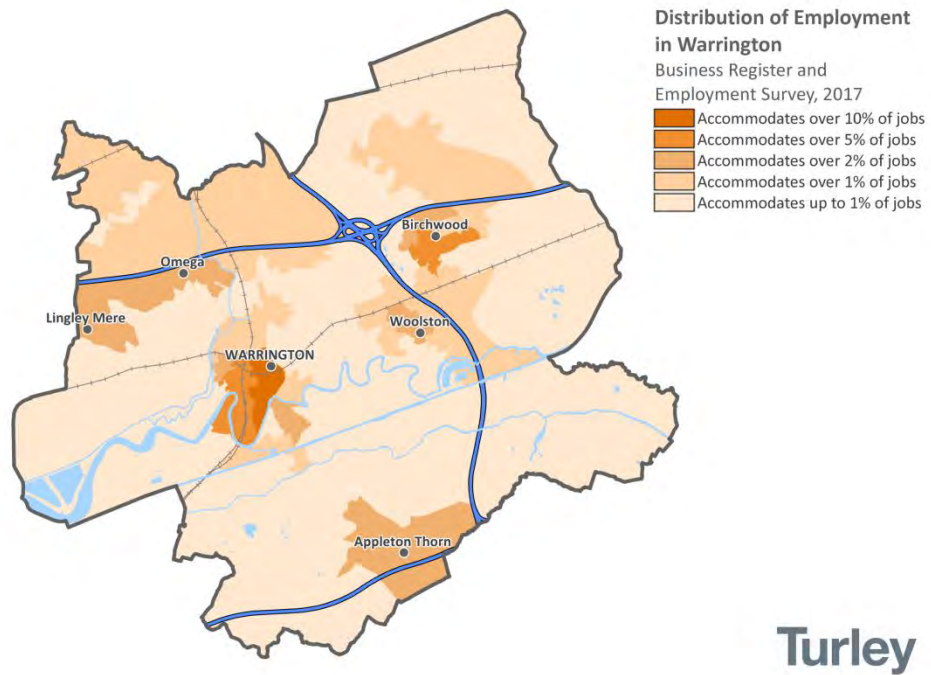
Balance of planned provision between north and south of the Borough

2.14 The spatial strategy proposed in the PSLP also results in a significant imbalance in the distribution of residential development between the north and south of the Borough. In this regard, it has failed to recognise, and does not reflect, the reality of the existing economic geography of Warrington. As of 2017, some 89% of jobs in the borough are

⁴ Warrington Borough Council (2019) Proposed Submission Version Local Plan: Responding to Representations Report, p126

situated to the north of the Ship Canal, with the following plan showing particular concentrations of employment in the town centre, Birchwood, Omega, Lingley Mere and Woolston⁵.

Figure 2.3: Distribution of Employment in Warrington (2017)



Turley

Source: ONS

- 2.15 Significantly, the 2011 Census confirmed that almost half (45%) of people working to the north of the Ship Canal lived within the same area. The remainder of jobs are primarily taken by people living outside of the borough (50%) with limited evidence to suggest that these jobs are filled by people living in the south of Warrington, given that such residents filled only 5% of jobs in the north.
- 2.16 A similar pattern emerges when isolating jobs to the north of the east-west railway line which bisects the northern part of Warrington town centre. Some 43% of the borough's jobs are situated to the north of the railway, of which a quarter (27%) are filled by people living in the same geography and circa 56% live outside of the borough.
- 2.17 Housing provided to the south of Warrington is therefore considered unlikely to support the continued economic prosperity of the north. This reinforces the deficiencies of an approach which proposes very limited growth of the northern settlements. With the likelihood of sustained demand in these areas from those seeking to live close to their place of work, an insufficient supply response through the PSLP risks imbalance and a deterioration of housing affordability. There is no evidence to suggest that the Council has taken these local market dynamics into consideration in

⁵ ONS (2019) Business Register and Employment Survey; Turley aggregation of lower super output areas

its spatial strategy, and as such there is a clear prospect that the strategy will fail to meet housing needs within the Borough.

3. Definition and testing of Spatial Options

3.1 Section 2 has outlined the key characteristics of the spatial distribution of development within the PSLP.

3.2 The Council's justification for selecting its spatial strategy is based upon a high level assessment of a number of variant housing growth and distribution options. This section of the report initially summarises the approach taken by the Council in assembling and assessing this matrix of alternative scenarios. It then proceeds to raise a number of fundamental challenge points to the approach taken by the Council which it is concluded means that the spatial strategy is unjustified and the PSLP unsound.

The Council's approach

3.3 The Council considers growth and distribution options together – collectively defined as 'the spatial strategy' - within the Sustainability Appraisal (SA).

3.4 Table 4.4 of the SA presents the nine alternatives considered (3 x growth options and 3 x distribution options).

3.5 The three growth options are consistent with the Development Options and Site Assessment Technical Report, where they are labelled⁶ as follows:

- (a) Standard methodology – total requirement of **19,998 homes** including 6,272 units to be delivered through the release of sites from the Green Belt;
- (b) Economic growth scenario – total requirement of **20,790 homes** including 7,064 units to be delivered through the release of sites from the Green Belt; and
- (c) Standard methodology (2016 base) – total requirement of **16,170 homes** including 2,444 units to be delivered through the release of sites from the Green Belt.

3.6 The three spatial distribution options are concerned solely with the distribution of the Green Belt releases to deliver housing development, with residential yield from non-Green Belt land being consistent in all three. These are presented in the SA as follows:

- Spatial Option 1: Focus all Green Belt releases in Warrington
- Spatial Option 2: Incremental growth of the Outlying Settlements (1,100 delivered through Green Belt releases in all growth scenarios) with the balance directed to Warrington
- Spatial Option 3: Increased dispersal of development to settlements (2,444 to 4,200 units delivered through Green Belt releases to Outlying Settlements depending on which growth scenario is applied) with the balance directed to Warrington

⁶ The SA itself describes these scenarios as E, F and D respectively, although their labelling in the Development Options and Site Assessment Technical Report A, B and C is used for clarity

- 3.7 The SA appraisal of Spatial Options is supplemented by an appraisal of each against the PLSP objectives within Appendix 2 of the Council’s Development Options and Site Assessment Technical Report (March 2019). This appraisal takes a slightly different approach to the SA in defining Spatial Option 3. It defines this as:

“Green Belt release adjacent to the main urban area complemented by a sustainable extension to one or more outlying settlements and incremental growth to outlying settlements”⁷

- 3.8 Paragraph 2.18 of the Development Options and Site Assessment Technical Report goes on to note that for the purposes of the appraisal of Spatial Option 3, a single urban extension of 1,400 residential units is assumed adjacent to one Outlying Settlement in respect of Growth Scenario A with two extensions of 1,400 units adjacent to two Outlying Settlements in respect of Growth Option B. The settlements which could be expanded are not identified, nor are the sites which would deliver the additional growth.

Critique of the tested growth options

- 3.9 The Council has tested the impact of providing between 16,170 to 20,790 homes in total across Warrington over the plan period. This equates to between 809 and 1,040 dwellings per annum, providing a level of flexibility (10%) beyond an underlying requirement for between 735 and 945 homes per annum.

Table 3.1: Overview of Growth Options

	Total requirement with flexibility (10%)	Total requirement excluding flexibility	Annual requirement excluding flexibility
B Economic growth scenario	20,790	18,900	945
A Standard method	19,998	18,180	909
C Standard method, 2016-based	16,170	14,700	735

Source: Warrington Borough Council, 2019

- 3.10 The lowest growth scenario falls below the Council’s calculation of the ‘*minimum starting point*’ of 909 dwellings per annum set by the standard method, within the NPPF and Planning Practice Guidance⁸ (PPG). It claims to have been derived from this method, but crucially incorporates the 2016-based household projections. The Council has conceded that it ‘*runs contrary to Government guidance*’⁹, because the PPG is

⁷ Development Options and Site Assessment Technical Report (March 2019) (Warrington Borough Council) para 2.15

⁸ PPG Reference ID 2a-010-20190220

⁹ Warrington Borough Council (2019) Development Options and Site Assessment Technical Report, paragraph 2.1

explicit that any approach which '*relies on using the 2016-based household projections will not be considered to be following the standard method*'¹⁰.

- 3.11 This scenario has seemingly been designed to assess the consequences of a lower level of growth, but Option A – correctly derived from the standard method – already enables an assessment based on the *minimum* level of housing growth needed in Warrington. There is no justification or basis for assessing a still lower level of provision, and such an approach would conflict with the NPPF and fail to meet even the minimum need for housing in Warrington. It cannot be considered to represent a reasonable alternative.
- 3.12 Furthermore, and reflecting the conclusions reached within Paper 2, it is considered that even the highest Option B (945dpa) would not meet the housing needs of Warrington in full. It would not support the 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 over the plan period, and its use of assumptions on the future behaviour of the labour force which understate the additional residents required to support such growth.
- 3.13 The application of more appropriate assumptions on labour force behaviour indicates that at least 1,077 homes per annum will be required to support even the Council's underestimate of future job growth. Supporting a more realistic level of job growth, based on the conclusions of AMION Consulting and aligning closely with the Council's earlier estimates in the PDO, would require 1,210 homes per annum.
- 3.14 On this basis, housing need will exceed the highest of the tested growth scenarios (945dpa) and the Council should therefore assess a higher growth scenario. Recognising the conclusions of Paper 2, it is recommended that this should aim to fully meet a need for in the order of 1,100 homes per annum.
- 3.15 An overall requirement for 24,200 homes is generated when applying the Council's 10% flexibility allowance to this higher need for housing. However, Paper 2 concludes that an increased flexibility allowance of 20% should be applied to mitigate the risks associated with the profile of the proposed housing supply, including the extensive reliance upon an emerging town centre market. This increases the overall requirement to 26,400 homes; some 27% above the highest of the growth options tested by the Council.

Range and definition of options for the growth of the Outlying Settlements

- 3.16 The Council's dismissal of Spatial Option 3 largely turns on the assumption that the diversion of units away from Warrington (in the context of the proposed housing requirement of 945 dwellings per annum), would undermine regeneration and associated economic growth objectives expressed through the PSLP.
- 3.17 It is instructive to highlight that there is limited difference between Spatial Options 1 and 2 in terms of the diversion of development away from Warrington, the difference

¹⁰ PPG Reference ID 2a-015-20190220

between the two being the question of where just 16% of the total Green Belt release is delivered. In contrast, Spatial Options 2 and 3 differ in respect of where 52% of the Green Belt release is delivered. The difference between these Spatial Options is stark.

- 3.18 It is perhaps not surprising therefore that a strategy of incremental growth (reflected in Spatial Option 2) in the Outlying Settlements is judged by the Council to be most sustainable when benchmarked against only one option for higher growth in the Outlying Settlements (Spatial Option 3) in the absence of strategic drivers to justify this.
- 3.19 As a sensitivity test, to determine a more reasonable level of the development potential of the Outlying Settlements, a moderated, and more realistic, version of Spatial Option 3 (somewhere between Spatial Option 2 and 3) should have been considered. This would mitigate the deficiencies in the appraisal process which arise from the very significant difference between Spatial Options 2 and 3 which, as above, mean that the sustainable growth capacity of the Outlying Settlements cannot be revealed.
- 3.20 This step would have allowed the proposed strategy of constrained growth within the Outlying Settlements to be properly tested against a positive strategy for the Outlying Settlements but one which is tempered to the extent that the scale of development in the Outlying Settlements would still be broadly proportionate to their collective size and role. A more appropriate strategy for the Outlying Settlements, and the growth related 'tipping point' at which harm may from a strategy of beyond incremental growth may arise on a settlement-by-settlement basis would be capable of being revealed through this approach.
- 3.21 Until this exercise is undertaken, the Council is unable to prove that restricting the Outlying Settlements to a 10% growth cap is either necessary to avoid the claimed harm (Green Belt, settlement character etc) and that there are not dis-benefits to the Outlying Settlements in restricting their growth to the extent proposed. The evidence base underpinning the PSLP is flawed as a result and the selected strategy cannot be justified. It is not an appropriate strategy taking into account reasonable alternatives.
- 3.22 Sections 6 and 7 of this Paper go some way to addressing this issue through assessment of specific settlements and sites and their growth potential. They consider whether and to what extent the development of these sites, on top of those proposed for allocation in the PSLP, would result in the claimed adverse impacts. Through this assessment it is demonstrated that a number of settlements can grow beyond incremental levels in a sustainable manner and without giving rise to the areas of harm assumed by the Council, and indeed that additional beneficial outcomes would arise from this. To the extent that this is proven through this Paper, those sites assessed could be allocated for development during the plan period.
- 3.23 Put simply, as a result of the above issues, the Council has failed to prove that a strategy of incremental growth in the Outlying Settlements is justified taking into account reasonable alternatives. The PSLP is unsound on account of this point alone.

- 3.24 Beyond the sites tested by Peel within sections 6 and 7 the Council may determine that it is appropriate to allocation further development to the Outlying Settlements through considering other sites and subjecting these to the same appraisal process.

Comments on the Council's appraisal of Spatial Options

- 3.25 Notwithstanding the above, the Council's conclusions regarding the adverse impacts arising from Spatial Option 3 are entirely unproven in not being made by reference to specific sites and settlements. Some such judgements can only be made in the context of a sufficient degree of certainty as to how the Spatial Option would be delivered and which sites may be relied upon. Accordingly, the Council's justification for the rejection of Spatial Option 3 based on assumed environmental and associated impacts but without reference to the settlements, let alone sites, which would deliver the growth in this scenario, is fundamentally flawed.
- 3.26 Further, in addition to this, and irrespective to the deficiencies in the Council's approach to defining Spatial Option 3, Peel challenges a number of conclusions drawn by the Council regarding the adverse impacts of Spatial Option 3 as presented.
- 3.27 In highlighting these points, it is apparent that the assessment has not been undertaken on an objective basis with negative conclusions drawn regarding Spatial Option 3 relative to the others in circumstances where there is, in reality, no material difference between the two.
- 3.28 These points are considered in turn below.

Green Belt harm (Objective W2)

- 3.29 The Council's appraisal notes that Spatial Options 1 and 2 provide:

'Opportunity to accommodate development within the General Areas identified as poor or moderate, maintaining the integrity of the Green Belt.

At the local level individual parcels making a poor, medium and strong contribution to the Green Belt will need to be developed.

Opportunity to provide robust permanent Green Belt boundaries capable of enduring beyond the plan period'

- 3.30 The assessment then provides the following comments in respect of Spatial Option 3:

'Settlement extensions will require land to be released from stronger performing areas of the Green Belt. This will impact upon the strategic importance of the Green Belt, the long term robustness of the Green Belt boundaries as well as resulting in the loss of individual parcels making a strong contribution.

The reduction in the amount of development adjacent to the main urban area will reduce the need to release individual parcels making a strong contribution to the Green Belt'

- 3.31 Strong, Moderate and Weak General Areas of Green Belt are identified around Warrington within the Council's 2016 Green Belt Assessment. Strong and Moderate General Areas of Green Belt are identified around the Outlying Settlements. In respect of Spatial Options 1 and 2, the expansion of Warrington would require General Areas of land to be released from the Green Belt which make at least a moderate contribution to the Green Belt.
- 3.32 The majority of General Areas of Green Belt around the Outlying Settlements, including all General Areas around Culcheth and Croft and the General Areas immediately to the north of Lymm, make a moderate contribution. In the context of Spatial Option 3, it would be entirely feasible to limit Green Belt releases around the Outlying Settlements to areas which make a moderate contribution to the Green Belt. Consequently there is, with appropriate site identification, ample opportunity to develop more land around the Outlying Settlements than the PSLP proposes whilst not using Green Belt of higher value that exists and is being used in the PSLP around Warrington.
- 3.33 Accordingly, Peel does not consider there to be a material difference in harm to the Green Belt between Options 1, 2 and 3.
- 3.34 Moreover, as noted above, the definitive Green Belt implications of each Spatial Option can only be considered by reference to an assessment of the sites which form that Spatial Option. It is particularly important to consider the site specific context to the different options where the high level appraisal of options reveals that the difference in impact is likely to be limited and thus there can be no certainty that there will be a material difference in impact in practice.

Settlement character (Objective W5)

- 3.35 The appraisal provides a single comment on the settlement character implications of Spatial Option 3:

This option could potentially impact on the character of more than one of the settlements

- 3.36 The appraisal suggests that Spatial Options 1 and 2 could have the equivalent potential impact on Warrington:

Depending on the specific location of development this option is likely to have a negative impact on the existing character of suburban areas....

- 3.37 However, the appraisal then offers additional commentary on the latter implying that that impact may be mitigated:

...although much of the outer part of the Warrington urban area has already seen significant recent growth from New Town status.

- 3.38 Whilst the final statement is accepted in principle, the same could very easily be said of a number of Outlying Settlements. Culcheth for example has expanded organically over a number of years, including substantial levels of post-war residential development, particularly to the north of the settlement. Its historic core is very small relative to the size of the settlement. It doesn't have an established and consistent character,

comprising developments of varying age and form. Its character is also defined by its size being a small town but having a service centre function serving the settlement and a number of smaller 'satellite settlements' surrounding it, such as Croft and Glazebury. It is one of only two Outlying Settlements with a defined Centre (Draft Policy DEV5). The other being Lymm.

- 3.39 It would be misleading not to acknowledge this context and the equivalent effect that the growth of a number of Outlying Settlements has had on their character in the same manner as Warrington.
- 3.40 The Council has not undertaken any work to define and consider impacts on settlement character rather it appears to be drawing the conclusion that adverse impacts on the Outlying Settlements could arise due to scale of change which would take place under Spatial Option 3. This is an unsubstantiated generalisation. It has no regard to which settlements might grow under Spatial Option 3 and which sites may deliver that growth. Qualified statements on the impact on settlement character can only be made with the benefit of this information. Claims of character impact are wholly unevidenced and Peel would strongly challenge the conclusions drawn as a result. No weight can be placed on these judgements.
- 3.41 This critical flaw is all the more concerning considering how significant this judgement has been in rejecting Spatial Option 3. In summarising the appraisal and selection of Spatial Options, the Council's Development Options and Site Assessment Technical Report effectively singles this out as one of the two primary determining factors in rejecting Spatial Option 3:
- 'Option 1 does not provide the same benefits for the settlements whilst Option 3 results in greater character impacts in the settlements and provides a weaker contribution to supporting the growth of the main urban area'¹¹*
- 3.42 The assumption of adverse character impact may turn partly on the fact that the Council has assumed that two (undefined) settlements would be subject to large single site extensions to them (1,400 units each) through Spatial Option 3. For the reasons outlined above, it is unreasonable to make negative assumptions on this topic without identification of the sites that are supposed to make up Spatial Option 3.
- 3.43 Finally, it is instructive to consider that the Garden Suburb proposal will deliver an urban extension comprising some 7,400 homes in total (including beyond the plan period) and 116 ha of employment land. It is inconceivable that this will not have a very significant impact on the character of this part of Warrington including the defined settlements of Stockton Heath, Grappenhall, Appleton and Dudley's Green.
- 3.44 Whilst part of the main settlement of Warrington, these neighbourhoods have their own character, history and identity. They include three separate Parish Councils (Stockton Heath, Appleton and Grappenhall and Thelwall), two Neighbourhood Centres and three Conservation Areas. They have an existence and presence which is

¹¹ Paragraph 2.32 Development Options and Site Assessment Technical Report (March 2019) (Warrington Borough Council)

independent of the main settlement of Warrington, albeit they are part of the same contiguous urban area.

3.45 In physical form, they are located on the outer edge of Warrington, set against the backdrop of open countryside. The assumption that the main urban area of Warrington, or parts of it, does not have a defined character to protect or indeed that that character has been compromised to the extent that the impact of further growth will be less is fundamentally flawed.

3.46 Whilst Peel does not object to the Garden Suburb proposal, it strongly disagrees with the Council's conclusion that, relative to the alternatives, Spatial Option 3 will necessarily have greater character impacts on existing settlements. The assumption of additional adverse character impacts on settlements through Spatial Option 3 cannot be substantiated and any such conclusion can only be drawn through a consideration of specific sites which may be called upon to deliver Spatial Option 3.

Impact on Borough's mineral resources (Policy W6)

3.47 In respect of Spatial Option 3, the Council's appraisal notes that:

'Development would be likely to impact on the Borough's mineral resources'

3.48 In respect of Spatial Option 2, it records that:

'Development could be accommodated without compromising the Borough's mineral resources'

3.49 This statement does not stand up to scrutiny. There are significant areas of land around the Outlying Settlements, including Culcheth, Croft and Lymm, which are not designated as mineral safeguarded areas as shown on the proposals map. Depending on which sites are selected for allocation, it would be possible to implement greater growth, towards Spatial Option 3 whilst largely or entirely avoiding mineral safeguarding areas.

Sustainable transport options (Policy W6)

3.50 In respect of Spatial Option 3 the Council's appraisal notes that:

'Settlement extensions may not perform as well against air quality objectives due to their geographical location increasing the need to travel and being harder to serve by public transport. This could in turn also impact negatively on the reduction in climate change'

3.51 In contrast, in respect of Spatial Option 2 the appraisal notes that:

'The majority of development adjacent to the main urban area provides more sustainable transport options and reduces the need to travel, which in turn would help to contribute to air quality objectives.'

3.52 The opportunity provided by concentrating development within Warrington to promote sustainable transport choices is fully acknowledged given its economic and service centre function. However, it would be an over-simplification to assume that

such opportunities do not exist within the Outlying Settlements. Lymm and Culcheth particularly are important service centres for the southern and northern Outlying Settlements respectively. They both contain Centres with a range of services with the potential to meet every day needs for residents of these settlements and surrounding smaller settlements.

- 3.53 However, these settlements and their Centres face a number of ongoing threats to their long term sustainability and viability and therefore to their ability to continue to provide their service centre function. A failure to take positive steps to secure the future viability of these centres will see their role and service offer reduced, the consequence of which will be that existing residents need to travel beyond these locations to meet their day to day needs and thus promoting unsustainable transport choices. Targeted growth of the Outlying Settlements can mitigate this, providing an increased resident population and associated spending capacity to support the future viability of the service centres and in turn ensuring residents can meet their needs locally.
- 3.54 The wider sustainability benefits derived from growing the Outlying Settlements is considered in more detail in section 6 of this paper.
- 3.55 Further, the above statements do not reflect the reality of the Borough's economic geography. Whilst the town of Warrington is the main economic centre of the Borough, there are significant employment centres located to the north of the town at Birchwood Office Park, Lingley Mere and Omega. Depending on which Outlying Settlements are permitted to grow, development beyond the main town of Warrington can contribute to creating a more effective co-location of homes and jobs and thus promoting shorter car journey and indeed sustainable modes of transport.
- 3.56 For these reasons, Peel considers that the above statement cannot be substantiated. They oversimplify a nuanced point and do not have proper regard to a number of matters. As a result the Council has overstated the air quality benefits of Spatial Options 1 and 2 relative to Spatial Option 3.

Supporting the long term viability of the Outlying Settlements (Objective W1)

- 3.57 The Council's appraisal asserts that Spatial Option 2 will support the long term viability of the Outlying Settlements. Relative to Spatial Option 1, it will have a more positive effect in this regard. However, Peel does not agree that the proposed allocation for the Outlying Settlements is at a level whereby this will secure their long term viability in the context of the sustainability challenges and threats they face. Spatial Option 2 still represents a very constrained approach to the growth of the Outlying Settlements with limited material difference between it and Spatial Option 1.
- 3.58 The Council's conclusions are again wholly unsubstantiated and it has presented no evidence to understand the needs of the Outlying Settlements in this regard. It proceeds on the assumption that a token level of growth in the Outlying Settlements will suffice without subjecting this to any sort of testing, let alone that needed to underpin a Local Plan spatial strategy. This is given limited consideration such is the assumed imperative of directing development to Warrington.

- 3.59 Peel considers that the Council has significantly overstated the beneficial effects of Spatial Option 2 in this regard and failed to recognise the additional benefits of Spatial Option 3 in this regard. A fuller assessment of a number of the Outlying Settlements and the level of growth which they may need to accommodate to address current sustainability issues and genuinely secure their long term viability is presented in sections 5 and 6 of this Paper. The Council must expand its evidence base to enable a full consideration of this point in arriving at a more sustainable spatial strategy.

Education considerations

- 3.60 Spatial Option 3 is criticised through the Council’s appraisal on the basis that the Council considers that the suggested distribution of development means that:

‘They (settlement extensions) would not be of sufficient size to deliver a new secondary school and would therefore place additional pressure on existing schools’

‘Reducing the level of development adjacent to the main urban area might compromise the ability for new development to provide the additional secondary school required to support this level of growth’

- 3.61 In the case of the first point no evidence is presented to define or quantify the extent to which such ‘additional pressure’ would necessitate new school provision or that it could be sustainably accommodated based on future capacity within the existing provision. Appendix 8 provides a technical critique of this point which challenges the Council’s conclusion in so much as it identifies that it is likely that additional capacity will be available in the existing secondary schools (Lymm and Culcheth) which form the principal provision for the Outlying Settlements. The existence or indeed the scale of the impact of this specific factor is therefore considered to be over-stated by the Council as a result of a failure to provide a fully evidenced consideration of future capacity.
- 3.62 It is also considered important to recognise that national policy outlines that education infrastructure should proactively support housing growth, rather than be used as justification for constraining it, as appears to be the case through the Council’s assessment. The NPPF outlines that the role of plan-making is to “*positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change*” (para 11). The Department for Education (DfE), through the latest guidance on developer contributions, seeks to “*provide advice for local authorities on how to plan for new school places that are required due to housing growth*”, rather than limit housing growth based on infrastructure capacity. The emphasis is that education infrastructure should proactively support the “*ambitious housing agenda to increase housing delivery*”¹².
- 3.63 The second point established by the Council only justifies a different scoring between Options 2 and 3 where the scale of provision in the Urban Area is reduced, i.e. as is suggested under the Council’s Option 3 scenario. The extent to which this is applicable where it is acknowledged that the need for housing is higher than the Council’s options consider is assessed further in the next section of this paper.

¹² Department for Education (2019) Securing developer contributions for education

Deliverability considerations

- 3.64 Section 2 highlights that the proposed provision of residential land in the PSLP shows a strong bias towards the southern parts of the borough.
- 3.65 There is no evidence that the Council has explored the role of sub-market areas in supporting or influencing the deliverability of spatial options. As referenced in Paper 2, sub-markets have been clearly defined for the purposes of CIL and break the borough down into three market areas (north, central and south).
- 3.66 The concentration of supply in the latter two sub-markets, with notably lower provision in the north, risks failing to deliver the high levels of housing growth envisaged within the trajectory during the early years of the plan period. This is because *'there is a given depth of market at a given price for a given type of home of a given tenure in this particular place'*, which affects markets' ability to absorb new housing provision¹³.
- 3.67 Equally, in almost exclusively relying on the southern market to deliver much-needed family housing¹⁴, there is a heightened risk that this need will not be met if such homes are indeed delivered at a slower rate. This would fail to provide the types of homes needed to realise the Council's economic objectives, forcing people to seek family housing elsewhere – thereby increasing commuting distances – or stifling economic investment altogether.
- 3.68 The Council should have recognised the important contribution that could be made by the Outlying Settlements in addressing such issues, given that they are spread across the north and south sub-markets with the two largest (Lymm and Culcheth) falling within separate market areas. A more balanced spatial distribution of housing growth would reduce risks associated with individual markets' ability to absorb new supply, and maximise the prospect of delivering much-needed family housing.

Conclusions and implications

- 3.69 The key points drawn out of this section of the Paper are as summarised as follows:
- The Council has failed to demonstrate that a strategy of incremental growth within the Outlying Settlements is a **necessary** controlling measure to prevent harmful impacts on these settlements. To this extent, the strategy for the Outlying Settlements is not proven to be appropriate.
 - Given the significant differences between Spatial Options 2 and 3, the Council should have defined and tested a moderated version of Spatial Option 3 (somewhere between Spatial Options 2 and 3) to understand the 'tipping point' at which harm to the Outlying Settlements may occur from a strategy of beyond incremental growth on a settlement-by-settlement basis. This is a necessary step in determining whether the selected strategy is appropriate relative to reasonable alternatives. Critically, the need for this exercise is reinforced by the

¹³ Rt Hon Sir Oliver Letwin MP (2018) Independent Review of Build Out Rates – Draft Analysis, paragraph 4.18

¹⁴ A review of tables 22, 23 and 24 in the LHNA confirms that the need for 2 and 3 bedroom homes represents 72% of total needs. A need for close to 3,000 larger homes (4+ bedrooms) is also identified. The LHNA also concedes that the Central area is more likely to be attractive to smaller, younger households (paragraph 6.56)

higher housing requirement which the PSLP will need to deliver as proposed by Peel.

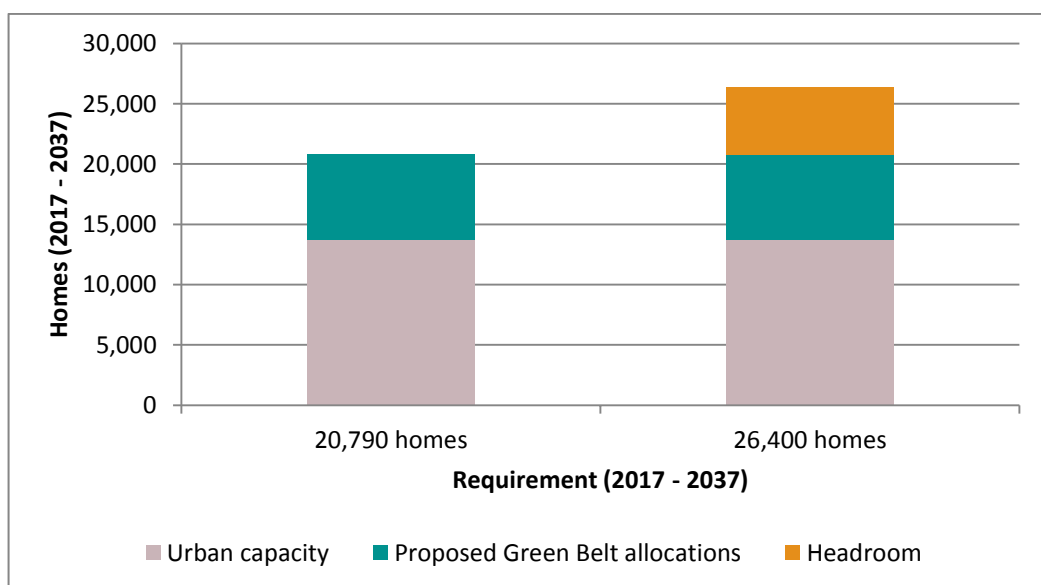
- The Council's assessment of Spatial Options draws unsubstantiated conclusions regarding the adverse impact of Spatial Option 3 on the character of settlements and Green Belt and fails to accurately define and record the character impacts arising from Spatial Options 1 and 2. Further these conclusions are drawn without reference to specific settlements which may grow under Spatial Option 3 and the sites which may be allocated in this context. A number of the assumed impacts are essentially tied to and dependent on the land and sites which would be developed. Thus it is not in fact appropriate or possible to seek to draw such conclusions without further definition of how the Spatial Option would be delivered (i.e. by reference to specific settlements and sites) in the manner attempted by the Council. The Council's conclusions regarding the adverse impacts of Spatial Option 3 are not supported by a sufficient evidence base.
- The Council's assessment of Spatial Options overstates the beneficial impacts on the Outlying Settlements of permitting their growth at incremental levels and fails to give due weight to the added benefits that would arise from the higher levels of growth within the Outlying Settlements inherent within Spatial Option 3

3.70 As a result, in the context of an increased housing requirement, Peel does not agree with the Council's overall conclusion that Spatial Option 2 has been proven to represent the most sustainable relative to reasonable alternatives.

4. The impact of an increased housing requirement

- 4.1 As introduced in the preceding section, Paper 2 demonstrates that there is a minimum requirement for 1,100 homes per annum in Warrington, which would require provision for 26,400 homes in total when making an appropriate allowance for flexibility (20%). This exceeds the growth options that have been tested by the Council.
- 4.2 In this scenario, there would be a need to release land from the Green Belt to deliver some 12,674 residential dwellings during the plan period.
- 4.3 The perceived negative impact associated with a reduction in the critical mass of development in the Warrington urban area and SUEs is understood to be one of the key factors cited as undermining the comparative sustainability scoring of Spatial Option 3 in the Council's evidence.
- 4.4 Importantly an alternate to Spatial Option 3 could, in these changed circumstances, be presented which maintains the Green Belt release allocation within Warrington proposed through the PSLP (6,700 units across two locations) whilst increasing the allocation for the Outlying Settlements in order to meet their needs. For example, in this context the Spatial Option 3 level of growth within the Outlying Settlements (some 4,200 units) could be taken forward alongside an increase in the level of growth within Warrington compared to the PSLP. Indeed, almost 6,000 dwellings (i.e. the full headroom) could be delivered within the Outlying Settlements without reducing development within Warrington beyond the levels proposed through the PSLP.
- 4.5 A strategy of beyond incremental growth within the Outlying Settlements would thus not divert development away from Warrington.

Figure 4.1: Headroom in Context of Increased Housing Requirement



Beyond incremental growth in the Outlying Settlements - impact on regeneration and economic growth objectives of the PSLP

- 4.6 The regeneration of Warrington is a key driver of the PSLP. This is reflected to varying degrees in the following PSLP objectives:
- Objective W1: To enable the sustainable growth of Warrington through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods whilst meeting housing and employment needs
 - Objective W3: To strengthen and expand the role of Warrington Town Centre as a regional employment, leisure, cultural and transport hub whilst transforming the quality of the public realm and making the town centre a place where people want to live
 - Objective W4: To provide new infrastructure and services to support Warrington's growth; address congestion; promote safer and more sustainable travel; and encourage active and healthy lifestyles.
- 4.7 Spatial Options 1 and 2 are reported as performing favourably against the above options given that they focus on growing Warrington with, at most, incremental growth of the Outlying Settlements.
- 4.8 The desire to deliver a critical mass of development in Warrington evidently underpins the PSLP and is the fundamental reason why a very constrained approach to the growth of the Outlying Settlements is deemed to perform better than the alternatives considered.
- 4.9 However, to the extent that directing growth to Warrington supports the PSLP's objectives (as per Spatial Options 1 and 2), this turns largely on the absolute level of development directed to this location, not the overall proportion. Additional development in Warrington, in the context of a higher housing requirement across the Borough, would not therefore deliver proportionate additional benefits.
- 4.10 This is acknowledged in the SA which, when considering the difference between Spatial Options 1 and Spatial Option 2 (the former proposing more growth in Warrington) states that *'focusing entirely on the Warrington inner area would not provide the same benefits for the outlying settlements, and the additional growth in the urban area would not be likely to generate significantly different impacts in terms of socio-economic development.'*
- 4.11 Undertaking an appraisal of the Spatial Options and their relative merits in the context of the higher housing requirement proposed by Peel would significantly alter the appraisal's findings, noting in this scenario, and in the context of Spatial Option 3, the level of residential development directed to Warrington could be maintained at the same level as the PSLP (or could be even higher) whilst still supporting a greater dispersal of development across the Borough. For example, on the basis of planning for the release of Green Belt land to deliver 12,674 dwellings, as proposed by Peel, the Outlying Settlement allowance could increase to some 6,695 without reducing the level of Green Belt release around Warrington compared to the PSLP.

4.12 Accordingly, in this context the following adverse comments regarding Spatial Option 3 as defined and appraised in Appendix 2 of the Development Options and Site Assessment Technical Report would be invalid:

- Objective W1: *'...unlikely to support strategic infrastructure delivery and the regeneration of Inner Warrington'*
- Objective W5: *'Reducing the level of development adjacent to the main urban area might compromise the ability for new development to provide the additional secondary school required to support this level of growth'*
- Objection W5: *'Potential to have a positive impact on the character of Inner Warrington although less development in proximity to the main urban area may compromise the delivery of strategic infrastructure required to unlock major brownfield development site'*

4.13 These adverse effects would not arise in the context of such a version of Spatial Option 3 on the basis of an increased housing requirement.

4.14 This represents a significant material change to the context in which the Council has undertaken its appraisal of Spatial Options and out of which Spatial Option 2 has been deemed to be the most sustainable.

4.15 In short, based on the higher housing requirement, the benefits derived from directing the level of development to Warrington as proposed under Spatial Options 1 and 2 would still be realised through Spatial Option 3, or a moderated version of it, defined on the basis of a higher housing requirement.

4.16 The justified increased housing requirement changes the whole basis on which the Spatial Options should be appraised against one another and their relative adverse and beneficial effects therefore.

Beyond incremental growth – impact on education

4.17 In section 3 it was identified that the Council's assessment scores Option 3 worse than Option 2 as it is suggested it would undermine the capacity to increase secondary school provision to serve the growth in the Urban Area.

4.18 As outlined above a variant of Spatial Option 3 established in the context of a higher housing requirement would not result in the level of development planned within and on the edge of Warrington being reduced compared to Spatial Option 2 – indeed it may result in this being increased. Accordingly, on the basis that the level of growth planned for Warrington through Spatial Option 2 is sufficient to deliver a new secondary school in this location, such a version of Spatial Option 3 would not be scored differently on this specific aspect to Option 2. The adverse impact on Warrington as suggested above will not arise in this scenario therefore.

4.19 The potential impact on secondary education provision within the Outlying Settlements arising from Spatial Option 3 is considered in detail through a separate technical note included at Appendix 9 and drawn upon in sections 5 and 6. It is concluded that existing schools are likely have additional capacity over the plan period to accommodate

further growth in pupils. This would not support the Council's assertion in this regard and would suggest re-consideration of the scale and distribution of housing proposed to the Outlying Settlements under Option 3 where it is recognised that the need for housing is higher.

5. Outlying Settlements: beyond incremental growth

- 5.1 Having regard to the issues raised, 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 the appropriate strategy for the distribution of the 'headroom' housing need. As demonstrated above, in respect of this headroom:
- There is no pressing requirement for this to be directed to Warrington to achieve strategic objectives of the PSLP around the regeneration of the town and infrastructure delivery;
 - The Council's evidence does not demonstrate that the realistic and sustainable growth capacity of the Outlying Settlements is limited to incremental levels (10%) or that this is a necessary control to prevent harmful impacts arising. Thus all or some of the settlements may be able to accommodate a level of development beyond this in a sustainable manner; and
 - The Council's evidence does not consider the consequences of capping growth at the levels proposed or the impact this could have on curtailing the benefits of growth in some or all of the Outlying Settlements.
- 5.2 Furthermore, whether and to what extent impacts associated with further growth arise within the Outlying Settlements can only be determined through a consideration of the settlements and sites which are to deliver that additional growth alongside those proposed to contribute to delivering incremental growth.
- 5.3 As noted, this 'real world' assessment is particularly important in cases where a Spatial Option's assumed adverse effects relate to the characteristics of the land which may be relied upon to deliver that Option. Unless the land is explicitly defined, there is no clarity that the claimed impacts will arise or indeed are likely to arise. This applies to a number of areas where Spatial Option 3 is deemed to perform poorly against Spatial Options 1 and 2 according to the SA and the Council's Development Options and Site Assessment Technical Report.
- 5.4 In the context of an increased housing requirement and in the absence of any clear imperative to direct the numerical headroom to the main settlement of Warrington, the question of whether greater than incremental growth in the Outlying Settlements will deliver benefits which Spatial Options 1 and 2 cannot **and** whether those benefits can be realised in part or full without giving rise to the adverse impacts assumed through the Council's appraisal is critical. This testing of realistic capacity of the Outlying Settlements is a critical stage in the development of the Local Plan.
- 5.5 The fundamental change in context arising from the increased housing requirement which Peel proposes requires this matter to be considered. This then informs a consideration of where the headroom should be delivered with a view to ensuring the positive effects of this additional growth are maximised and its adverse effects

minimised. For the reasons outlined above, this requires a more forensic consideration of the settlements and sites which may accommodate this growth.

The remainder of this paper considers these questions by reference to specific sites and settlements. In overall terms this demonstrates that a strategy of enabling at least some Outlying Settlements to grow beyond the level proposed and to the extent that they collectively accommodate greater than an incremental level would be the proper justified approach in the context of a higher housing requirement and greater supply flexibility. Through this process, specific sites within the Outlying Settlements are identified which, as a minimum, should be allocated for residential development on top of those proposed for allocation within the PSLP. It is for the Council to determine the full extent to which the Outlying Settlements should be permitted to grow beyond these sites in the context of the outcomes of Paper 2 of Peel's submission.

6. Culcheth: beyond incremental growth

- 6.1 Peel has undertaken work to consider the growth potential of Culcheth, including understanding the potential impacts of its growth beyond incremental levels and the beneficial outcomes which may be realised by this. In accordance with the observations made in section 5, and addressing the identified flaw in the Council's approach, it has done this by reference to specific site proposals but also considers the characteristics and constraints of the settlement more generally. Clearly this approach is significantly more robust than the Council's in appraising Spatial Option 3 which did not consider specific settlements and their sensitivities and capacity, let alone specific sites. This is necessary to reveal whether and to what extent adverse impacts would arise from permitting settlements to grow beyond an incremental level, as is the Council's claim.
- 6.2 This assessment considers a growth scenario for Culcheth which reflects the combination of the following:
- (a) Retaining the existing proposed housing allocation (Site OS3) – 200 units
 - (b) Retaining the urban capacity taken from SHLAA – 37 units
 - (c) Allocation of land to the north east of Culcheth for development during the plan period – 300 units (Peel's proposal)
 - (d) Allocation of an additional site as safeguarded land to meet needs beyond the plan period at north east Culcheth – 300 units (Peel's proposal)
- 6.3 The following paragraphs therefore tests the scenario of Culcheth delivering **537 residential dwellings during the plan period (a to c)**, with provision made for an **additional 300 units beyond the plan period (d above)**. This would represent a c18% growth in the number of dwellings in Culcheth over a 20 year plan period.
- 6.4 This work demonstrates that the settlement of Culcheth can accommodate at least this level of growth in a sustainable manner by reference to specific site proposals. There may be capacity for additional growth which the Council will need to consider as part of its appraisal of options for accommodating the additional housing requirement.
- 6.5 The analysis proceeds in Section 7 to consider three other Outlying Settlements, following a similar approach, albeit noting that the proposed additional growth is set at an even more modest level.

Relationship with Paper 4

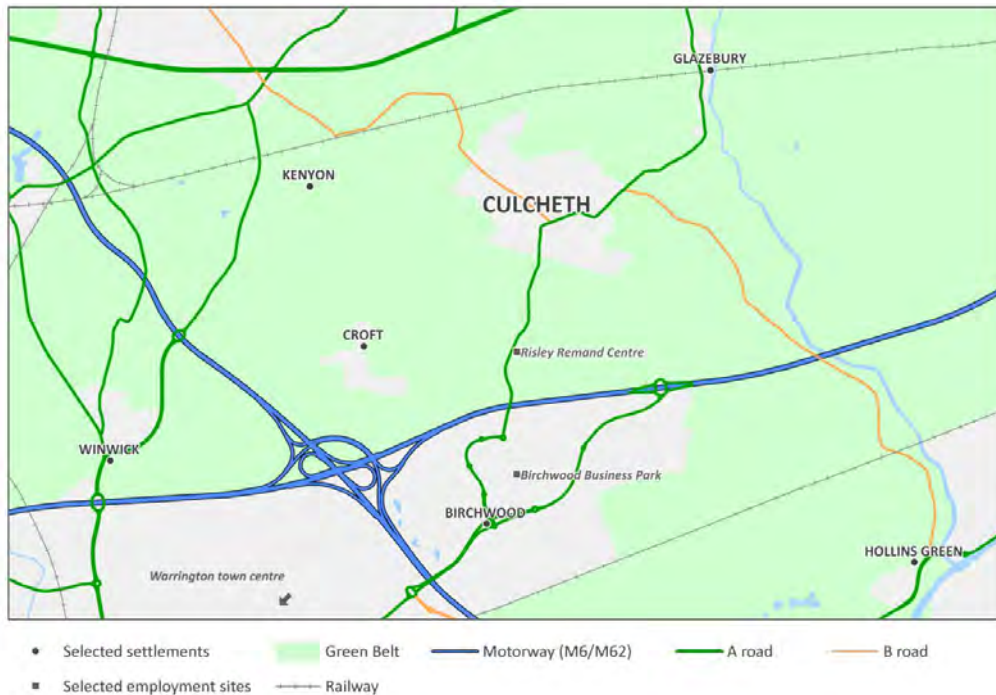
- 6.6 This section of Paper 3 should be read in conjunction with Paper 4 which responds to the Council's appraisal of a number of sites Peel has put forward for allocation and presents counter evidence that the assumed impacts and constraints to the development of these sites would not arise. It also presents evidence to demonstrate that if the respective settlement growth allocation in each case were to remain unchanged, notwithstanding Peel's comments in this Paper and Paper 2, Peel's sites

would provide the most appropriate means of accommodating this growth and should be prioritised above those sites selected for allocation by the Council through the PSLP.

Culcheth in context

- 6.7 Culcheth is the largest settlement to the north of Warrington borough, serving as a hub to its smaller surrounding settlements.
- 6.8 As illustrated in the following plan, Culcheth is situated to the north east of Warrington town, close to the M62/M6 junction and within proximity of the highly successful Birchwood Business Park. Indeed, the development of both Birchwood Business Park and Risley Remand Centre has historically been cited as a driver of population growth in Culcheth, accommodated through housing development in the post-war years¹⁵. This was, however, constrained through the designation of the Green Belt around Warrington in 1979¹⁶, which surrounds the urban area of Culcheth on all sides.

Figure 6.1: Location of Culcheth



Source: Turley, 2019

Peel's proposal at North East Culcheth

- 6.9 Peel has historically promoted the allocation of a site north east of Culcheth for the development of approximately 900 residential dwellings alongside a new Country Park serving the settlement and those surrounding it. An updated Development Prospectus for Peel's proposal is submitted as part of its representations. This proposes the

¹⁵ <http://culcheth.org/history1.htm>

¹⁶ Warrington Borough Council (2016) Green Belt Assessment, paragraph 14

allocation of land to the north of Culcheth for residential development to provide a minimum of 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. This evidently represents a reduction in the scale of proposed development from that previously proposed.

6.10 The site is well related to the existing settlement with its southern boundary adjoining existing residential properties and Culcheth High School. It is also well related to existing services and facilities within Culcheth, including primary schools, supermarkets, bus routes and recreational facilities.

6.11 A conceptual masterplan for the Peel site is presented in the accompanying Development Prospectus, and provided at Appendix 1. This shows how the site could be developed in a sustainable manner to deliver a total of 600 dwellings (300 during the plan period and 300 beyond – the latter through a logical proposed allocation of safeguarded land). The masterplan has taken its cues from the existing landscape features within and around the site, including vegetation, landform, views, ecology, drainage and built form. In summary, the proposals comprise:

- Residential development of approximately 600 dwellings (across two plan periods) over c. 30% of the total site area. New housing will be of mixed tenure (including affordable housing), size and type, with a good quality family housing. Residential development parcels will front onto the Country Park and green infrastructure network and provide local features in views from within the site.
- A new Country Park as part of the development located to the north of the development area, 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.
- A new woodland buffer along the eastern boundary to screen development from the wider landscape and improve woodland connectivity within the site. The provision of new sports pitches within the site could facilitate the extension of Culcheth High School.
- A series of green links through the site, providing pedestrian and cycle connections for existing and future residents to the Country Park, allowing the proposed development to integrate with the surrounding residential areas and the landscape to the north and east.
- Vehicular access from Warrington Road in respect of the plan period development with potential emergency access and pedestrian/cycle connections to Wellfield Woods and Withington Avenue.
- Provision of 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.

- 6.12 A significant amount of technical assessment work for the site has been undertaken and is presented in a technical appendix to the accompanying Development Prospectus. That work includes surveys and appraisals in relation to ecology, built heritage, flood risk and drainage, landscape sensitivity, health and safety, highways and access and utilities. Collectively, this work demonstrates that the site is not affected by any constraints which would prevent or unduly constrain its development, and the site does not require the provision of significant or unusual infrastructure to enable it to be delivered.
- 6.13 The site represents a sustainable opportunity capable of accommodating a desirable and high quality residential development. It will make a positive contribution to the settlement of Culcheth by integrating into the existing settlement, retaining and enhancing important features within and surrounding the site. The site is also situated in a strong market area, which experiences high demand for new homes. The site is therefore readily deliverable to the extent proposed over the plan period whilst being capable of delivering further development beyond.

Strategic open space benefits

- 6.14 Alongside residential development, as referenced, Peel proposes to deliver a new Country Park to the north of its proposed residential development and a separate area of open space to the east, providing mix of strategic green infrastructure for the settlement. This would be a major asset for Culcheth, providing a total of 58.84 ha of accessible and diverse green space. This represents a unique benefit of Peel's 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, including:
- Semi-natural green space (total area deficit of 11.85 ha)
 - Equipped plan (total area deficit of 2.11 ha)
 - Parks and gardens (total area deficit of 18.74 ha)
 - Allotments (none recorded in the area)
- 6.15 The open space offer can be shaped to respond to these deficits.

Extent of Green Belt release and policy designation proposals

- 6.16 In total, 58.43 ha of land would be released from the Green Belt through Peel's proposal, including 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. This is articulated through the plan provided at Appendix 2.

Transport benefits

- 6.17 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.
- 6.18 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 growth scenario

- 6.19 A settlement growth scenario of 537 dwellings being provided during the plan period, including through the release of land to the north east of Culcheth for this purpose with provision made for a further 300 units beyond the plan period, is subject to further assessment below including by reference to specific sites where needed.

Accessibility and promoting sustainable transport

- 6.20 Culcheth is the second largest Outlying Settlement in the Borough (after Lymm) and one of only two with a defined Centre. It functions as a service centre for the northern Outlying Settlements providing a wide range of every day services, including three primary schools and a secondary school. The depth and range of services mean that it is able to accommodate a high level of growth compared to other Outlying Settlements in a sustainable manner.
- 6.21 The compact nature of the town (approximately 1.8km on the east – west axis and 1.2km on the north – south axis) means that the central location of most of the facilities and services provides the opportunity for residents to walk or cycle. Culcheth also benefits from transport networks that fulfil both a place and movement function such as the network of quiet streets, Public Rights of Way and Culcheth Linear Park that provide a range of quality connections and recreational routes.
- 6.22 Culcheth's location to the north of the Borough also means that the settlement has good accessibility to Warrington's key employment locations, with 89% of the Borough's jobs currently being situated to the north of the Manchester Ship Canal.
- 6.23 Culcheth is ideally situated for its residents to take advantage of employment opportunities at Birchwood Park, a major employment area located just c3km to the south of Culcheth and directly accessible via the A574. Additional growth at Culcheth would help address the imbalance between proposed housing development in the north and south and help achieve a better synergy between homes and jobs given the presence of key employment areas in the northern part of the Borough.

Land north east of Culcheth

- 6.24 As part of this increased level of growth, Peel's site is located within walking distance of the Centre via a number of pedestrian connections. These connections effectively knit the site into the existing settlement area, thus meaning a pedestrian and cycle friendly form of development can be delivered, promoting sustainable transport options and helping achieve an effective integration into the settlement. Its significant interface with the existing urban area along its southern boundary helps to achieve this integration and thus improving its connectivity with key services. The site is well served by public transport with a number of services running along Warrington Road and thus directly accessible from the site.
- 6.25 As outlined above, Peel's proposals also provide the added benefit of helping to alleviate congestion and pre-existing traffic constraints along Warrington Road and close to Culcheth High School.

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, thus helping to mitigate congestion on the road network. There are no accessibility constraints to the expansion of Culcheth to deliver 537 dwellings. In this context, Peel's site north of Culcheth represents a sustainable site for development as part of an increased allocation for the settlement. The proposal for additional growth in Culcheth would not conflict with Objective W4 of the PSLP.

Green Belt

- 6.26 Culcheth is surrounded by defined General Areas of Green Belt which are deemed to make a **moderate** contribution to the Green Belt according to the Council's 2016 Green Belt Assessment. This includes defined General Area 1 within which Peel's proposed development site is located. As such, there would be no requirement for the release of land from General Areas making a strong contribution to the Green Belt in order to deliver a higher level of growth, including through the release of land to the north east of Culcheth.
- 6.27 It is noted that General Areas of Green Belt which make a moderate contribution to the Green Belt are proposed for release from to the south of Warrington to deliver its development needs. This is entirely compatible with Objective W2 of the PSLP '*To ensure Warrington's revised Green Belt boundaries maintain the permanence of the Green Belt in the long term*'. Thus the release of additional Green Belt land at Culcheth will not dependent on utilising Green Belt land which makes any greater contribution to the Green Belt than that which the PSLP is already reliant upon.

Land north east of Culcheth

- 6.28 In respect of land to the north east of Culcheth specifically, Peel's representation to the 2016 Regulation 18 consultation on the Local Plan provided comments on the Council's Green Belt Assessment. Through this Peel made a case that the defined Green Belt parcels within which its site falls (Parcels CH2 to CH7) should be redrawn to the Manchester-Liverpool railway to the north of Culcheth and then their contribution to the Green Belt assessed on this basis. This reflects the Green Belt Assessment's own methodology of seeking to define parcels only on durable lines where possible. In

accordance with the Green Belt Assessment's own methodology, this would mean the parcels being drawn along durable boundaries and on which basis their contribution would be adjusted from **strong** to, at most, **moderate**.

- 6.29 Notwithstanding this, Peel's proposal as presented includes the provision of strategic areas of green space surrounding its development site and the proposed safeguarded area. As shown on the plan at Appendix 2, the land to the north of the development area up to the railway line would remain within the Green Belt but would be subject to a new '*country park*' policy designation to protect the area from development. Additional tree planting as part of the Country Park would make a further positive contribution in providing a physical defensible boundary. Thus the new Green Belt boundary defined by the northern extent of developed area would be bound by a protective policy designation which would prevent encroachment of the urban area north, reinforcing the permanence of the redefined urban boundary. The same would apply to the land to the east, proposed as an area of '*public open space*' which, though removed from the Green Belt, would provide a protective gap between the urban area and the Green Belt acting as a long term durable boundary.

The growth of Culcheth to include the Peel proposals beyond an incremental level would not result in strategic harm to the Green Belt or affect its long term permanence. There are no Green Belt constraints to the expansion of Culcheth to deliver 537 dwellings during the plan period and 300 beyond the plan period. In this context, Peel's site north of Culcheth represents a sustainable site for development as part of this increased allocation for the settlement. The proposal for additional growth in Culcheth would not conflict with Objective W2 of the PSLP.

Ecology

- 6.30 In respect of the candidate sites for release from the Green Belt, the Council's appraisal notes that most of these are free from ecological constraints.

Land to the north east of Culcheth

- 6.31 In respect of Peel's site, the Preliminary Ecological Assessment submitted alongside the Development Prospectus demonstrates that the site is not affected by any insurmountable ecological constraints and development can be accommodated in an acceptable manner subject to the employment of standard mitigation measures during construction and operation.

The growth of Culcheth beyond an incremental level would not result in unacceptable ecological impacts. There are no ecological constraints to the expansion of Culcheth to deliver 537 dwellings during the plan period and 300 beyond the plan period. In this context, Peel's site north of Culcheth represents a sustainable site for development as part of this increased allocation for the settlement.

Agricultural Land

- 6.32 In respect of the candidate sites for release from the Green Belt, the Council's appraisal notes that a number of these are not Best and Most Versatile agricultural land.

Land to the north east of Culcheth

- 6.33 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).

The growth of Culcheth beyond an incremental level would not result in the significant loss of Best and Most Versatile land. There are no agricultural land constraints to the expansion of Culcheth to deliver 537 dwellings during the plan period and 300 beyond the plan period. In this context, Peel's site north of Culcheth represents a sustainable site for development as part of this increased allocation for the settlement. Insofar as agricultural land is concerned, the proposal for additional growth in Culcheth would not conflict with Objective W6 of the PSLP.

Landscape/townscape/character

- 6.34 Peel's site at north east Culcheth is located within 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 2007 Landscape Character Assessment. The site selected for allocation by the Council (Site OS3) lies within a different defined Landscape Character Area (Landscape Character Area 2B – Holcroft and Glazebrook Moss, which is part of Landscape Character Type 2: Mossland Landscape), thus there is no prospect of a cumulative impact in landscape terms.
- 6.35 In addition there are few locations from which the development of Peel's site and the draft allocation site would be seen in the context of one another. The location of the built form associated with Culcheth Community Primary School and Culcheth High School means that there is little intervisibility between the two sites. As such, the effects of these schemes are less likely to be experienced cumulatively.

Land north east of Culcheth

- 6.36 The Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal Landscape Appraisal undertaken by Randall Thorp and submitted alongside the Development Prospectus considers the site in landscape, townscape and visual terms.
- 6.37 It demonstrates, through a full assessment, that a well-designed development in this location that preserves the existing landscape features and Public Rights of Way within a green infrastructure network and responds sensitively to the setting of the existing Conservation Area and surrounding townscape character would avoid any significant effects on the character of Culcheth or the wider landscape. The submitted Development Prospectus outlines how this will be achieved through the masterplan approach presented as informed by the guiding principles set out in the Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal Landscape Appraisal.

The growth of Culcheth beyond an incremental level would not therefore result in unacceptable landscape, townscape and character impacts. There are no such constraints to the expansion of Culcheth to deliver 537 dwellings during the plan period and 300 beyond the plan period. In this context, Peel's site north of Culcheth

represents a sustainable site for development as part of this increased allocation for the settlement.

Secondary education

- 6.38 The Council has implied that one of the constraining factors behind providing for higher growth within the Outlying Settlements is the absence of secondary school capacity, but has taken a simplistic approach in its consideration of this issue as referenced in the preceding Sections.
- 6.39 Analysis by Peel, included in a technical note at Appendix 8, indicates that over 30% of Culcheth High School pupils travel from outside of Warrington. There is evidence of planned new school provision outside the Borough which will reduce the draw of Culcheth High School to pupils living outside of Warrington, thereby freeing up capacity.
- 6.40 Furthermore, as shown in the Masterplan proposals at Appendix 1, Peel has identified the potential to expand Culcheth High School. The exact scale of the capacity which could be created through such an expansion would need to be determined through future detailed designs and would need to be proportionate to the evidenced scale of any deficit. However, this offers significant flexibility in addressing any perception that the existing capacity of the High School could serve to limit the future growth of Culcheth, and other proximate Outlying Settlements.
- 6.41 The Council's rejection of a higher growth proposal for Culcheth based on limited secondary education capacity, at the current point in time, is inappropriate and unjustified. It 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 in Culcheth resulting from residential growth will be able to meet their secondary education needs locally. Moreover, the opportunity exists to extend Culcheth High School if needed as illustrated through Peel's masterplan proposal at Appendix 1.

In conclusion, the growth of Culcheth beyond an incremental level is not constrained by the capacity of the secondary school serving the settlement, with mitigation options available if needed. This should not constrain the expansion of Culcheth to deliver 537 dwellings during the plan period, or further growth thereafter. In this context, Peel's site north of Culcheth represents a sustainable site for development as part of this increased allocation for the settlement. Insofar as education provision is concerned, the proposal for additional growth in Culcheth would not conflict with Objective W4 of the PSLP.

Consideration of benefits

- 6.42 The Council has acknowledged that Spatial Option 3 will have the positive effect of '*increasing vitality*'¹⁷ of the Outlying Settlements. It makes the same statement regarding Spatial Option 2, insofar as this is permissive of some development (albeit constrained) within the Outlying Settlements.

¹⁷ *Ibid*, page 1

- 6.43 However, through the Council's high-level assessment of Spatial Options, any such benefits are seen to be offset by a cited number of potentially adverse consequences, which as demonstrated above are not substantiated where consideration is given to actual development proposals.
- 6.44 As noted above, the Council has not presented any evidence to support its conclusions regarding the future vitality of the Outlying Settlements and thus has failed to properly consider the development needs of Culcheth or any other Outlying Settlements in this regard. The Council does not know whether and to what extent the constrained approach to the growth of Culcheth will increase its vitality or indeed hamper it. It is evident that the growth of Culcheth beyond incremental levels will also generate further benefits for the settlement. The Council has failed to recognise these benefits or consider the extent to which the Local Plan should seek to realise them in the interests of achieving a sustainable future for the Outlying Settlements. It reflects that the Outlying Settlements are very much an afterthought. The nature of such benefits is considered below.

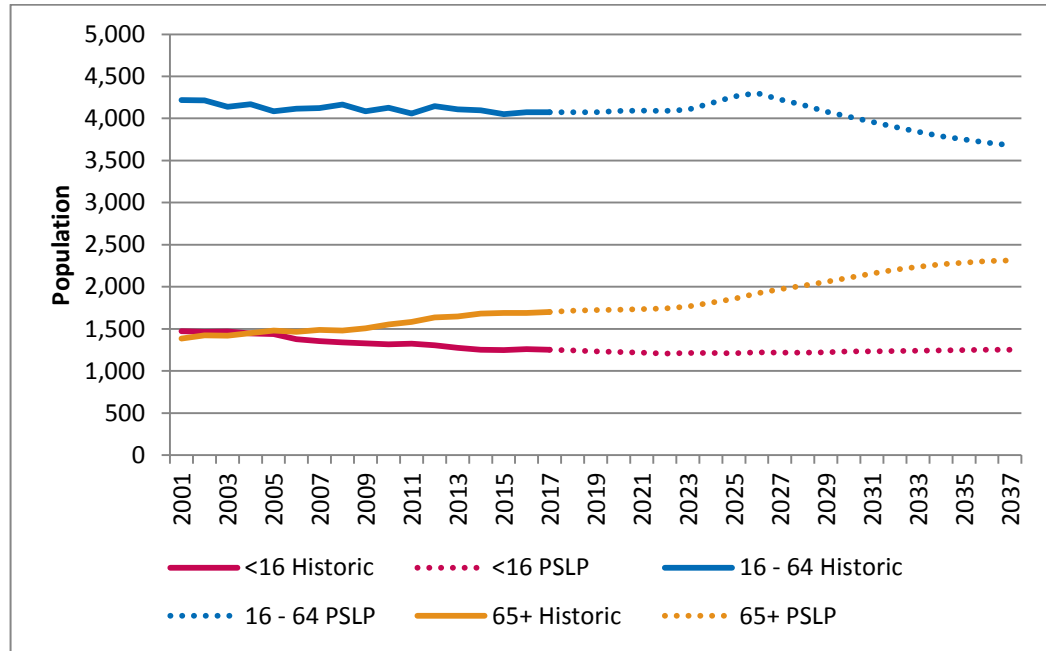
Providing the homes required to address an increasingly imbalanced population profile

- 6.45 The population of Culcheth has not been sustained over recent years, with the total number of residents marginally falling (by 1%) between 2001 and 2017. This contrasts notably with Warrington borough as a whole, where the population has grown by 10% over the same period¹⁸.
- 6.46 With the overall population of Culcheth falling this has had consequences for the age profile of its population. Over the same period the working-age population of the settlement has reduced more markedly, falling by around 3% since 2001. This contrasts with the 6% growth seen across Warrington over the same period. The reduction in the working-age population is predominantly due to a stark reduction of over a third (38%) in the number of residents aged 30 to 44.
- 6.47 This demographic trend will in no small part be related to the supply of housing which has been available for households to move into in recent years. Between the Census years the number of homes in Culcheth grew by only 4%, less than half that recorded across Warrington over the same period (10%). Data supplied by the Council indicates that between 2007/08 and 2016/17 the settlement saw on average only 8 homes per annum being completed.
- 6.48 As explained in section 2 the PSLP proposes to maintain this relatively modest growth in stock, suggesting the provision of 237 homes over the plan period or close to 12 per annum on average. This would grow the housing stock by around 8%, based on information published by the Council (Figure 2.2).
- 6.49 Such a level of growth is unlikely to offset the ongoing ageing of the population, but will rather serve to exacerbate this trend over the plan period. This is shown by local level demographic modelling configured by Edge Analytics using the POPGROUP suite of software, detailed in Appendix 9. This model has been used to assess the implications of population growth associated with the provision of homes as indicated

¹⁸ ONS via Nomis (2018) Mid-year Population Estimates

under the PSLP. Under these circumstances the modelling indicates that whilst the overall size of the population would marginally grow, the number of people of working age would decline. This is shown in Figure 6.2 (blue dotted line). Equally those 16 and under would also fall slightly (noting a relationship between these age groups) whilst the settlement’s older cohorts would continue to grow. The result would be a profile which is increasingly skewed towards older households in proportionate terms, therefore worsening the old-age dependency ratio within Culcheth.

Figure 6.2: Change in Culcheth’s population profile



Source: Turley analysis of Edge Analytics modelling, 2019

6.50 If Culcheth’s housing stock was enabled to grow to a more significant level as implied through the inclusion of Peel’s proposed site, this would be expected to support the greater provision of family-orientated housing and contribute positively to the overall housing mix in Culcheth. It would be reasonable to expect that even a comparatively modest level of additional growth would contribute positively to offsetting the forecast decline in the working-age population in particular, ensuring that the overall demographic profile of the settlement over the plan period retains a greater balance.

Enabling a more marked boosting of past housing delivery and increasing the provision of affordable housing

6.51 Looking specifically at Culcheth, it is evident – based on transactions in the calendar year of 2018 – that the average price paid for housing in the settlement¹⁹ (£289,133) was some 35% higher than the average price paid across the Borough.

6.52 Furthermore, average house prices have grown to a greater extent in Culcheth (36%) than wider Warrington borough (28%) over the past decade (2009 – 2018), and there has also been a recent acceleration in the rate of house price growth in the settlement,

¹⁹ See Appendix 5, Table 1

with an increase of 39% recorded since 2013. This is more than double the rate of growth in the wider borough during this time (19%), with the average price paid in the last three years consistently higher than at any point in the past decade. The result is therefore a widening of the gap between the average price of a house in Culcheth and the Borough as a whole. The price premium for housing in Culcheth relative to Warrington has been recorded at 33-35% over the past three calendar years, a significant increase from the 12% recorded in 2011.

- 6.53 This illustrates both the absence of more affordable housing for sale and the high cost of entering the local market in Culcheth, relative to the rest of the Borough. This indicates that affordability issues are more acute in Culcheth than on average across the borough.
- 6.54 The tenure mix in Culcheth further exacerbates the limited options for households on lower incomes to access housing. Owner occupation was the prevalent tenure recorded in Culcheth at the 2011 Census, with 82% of households owning their home. This exceeded the borough average (72%). A further 8% of households lived in the private rented sector, which is lower than seen across the wider borough (11%). Notably fewer households lived in a social rented home, however, with only 9% of households in Culcheth living in this tenure compared to 16% across Warrington.
- 6.55 There is no evidence that the Council has taken these local housing market pressures into account in justifying its proposal for an 8% growth of the housing stock in Culcheth. The proposed 236 additional homes in the PSLP does not, as referenced above, represent a boosting of the historic level of provision seen over the recent historic past. It could not, therefore, be expected to have a material impact in improving affordability. It is apparent that provision at a similar level has historically resulted in affordability issues being exacerbated in the settlement. Equally on the basis of the proposed policies in the PSLP, where it is assumed 30% of housing would be affordable, this would provide only 71 affordable homes over twenty years, at a rate of less than 4 dwellings per year. Again this would have a comparatively limited impact in making any significant headway in addressing the deficiencies in the tenure profile.
- 6.56 Evidently the provision of a higher number of homes offers a greater opportunity to mitigate demand pressures, where housing supply was more balanced with demand. Allowing for the provision of 537 homes in Culcheth during the plan period would see an average of 27 homes delivered annually; more than trebling the historic provision of only 8 dwellings per annum over the past decade, and thereby boosting supply.
- 6.57 Equally it would offer the opportunity to provide a significantly greater number of affordable homes, with this directly related to the overall provision of market homes which can be used to subsidise the provision of this tenure. The provision of a greater number of affordable homes would make a material difference to the profile of housing in the settlement and present an opportunity for lower-income households to form and remain in Culcheth.

Maintaining the critical mass and profile of population that is necessary to support the continued operation of social infrastructure in Culcheth

- 6.58 In respect of local education provision, the analysis above has confirmed that the further growth of Culcheth will not have adverse consequences that could not be

mitigated. It is also important to recognise that a larger population can also potentially *sustain* other aspects of the existing social infrastructure. This includes, for example, the existing retail facilities, which could be adversely affected by the more limited population growth associated with the incremental growth proposed in Culcheth under the PSLP.

- 6.59 As referenced above, Culcheth's population would be projected to grow by only just over 200 people under the PSLP, driven by an increase in older age cohorts. This would be unlikely to provide the additional demand needed to reinforce the vitality of the local retail centre. In contrast, in providing for a higher level of new housing, the associated growth in population would be more pronounced, as explained above, proving a greater level of local expenditure which would be expected to reinforce the existing retail offer and attract new investment.

The growth of Culcheth - conclusions

Having regard to the above, as part of the re-appraisal of the Local Plan spatial strategy, warranted by an increased housing requirement as proposed by Peel, it is concluded that Culcheth should accommodate at least 537 dwellings over the plan period in a sustainable manner, including 500 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.

The Council concedes through its evidence supporting the PSLP that a more pronounced level of development in the Outlying Settlements would have the positive impact of increasing the vitality of the settlements. The analysis in this section has affirmed that this is the case where it is assumed that Culcheth accommodates a moderately higher level of provision.

Accordingly, a revised spatial strategy should reflect an approach of greater than incremental growth in Culcheth to at least the above extent. In this context Peel's land to the north east of Culcheth should be allocated for development during the plan period (with a component of safeguarded land to meet needs beyond the plan period) as proposed and reflecting the unique benefits this proposal will deliver for the settlement and its long term vitality and sustainability.

In order to fully address the evidenced deficiencies in the PSLP, it is necessary for the Council to consider Culcheth could accommodate further development beyond the level evidenced by Peel, with reference to specific sites, in order to establish its sustainable growth capacity in the context of the Borough's increased housing need.

7. The potential to accommodate additional growth in other selected Outlying Settlements

- 7.1 It is evident that the PSLP must respond positively in identifying other opportunities to accommodate the revealed additional housing need sustainably. The review of Culcheth's capacity to accommodate additional growth sustainably, and indeed the potential to realise important beneficial impacts from this, has reinforced the role that the Outlying Settlements can play in this regard. In doing so, it has highlighted the clear flaws in the Council's reasoning and justification for rejecting higher levels of growth in the Outlying Settlements.
- 7.2 As set out in Paper 1, Peel is also promoting land in the settlements of Hollins Green, Croft and Lymm. Building on section 6, this section of the Paper demonstrates that further housing development within these Outlying Settlements could be accommodated in a sustainable manner, creating additional local benefits beyond those achieved by the PSLP strategy. It does this by considering specific development opportunities in each, including proposals put forward by Peel, and on a cumulative basis. More generally it considers settlement wide potential constraints and infrastructure capacity.

Relationship with Paper 4

- 7.3 For the same reasons as given in section 6, this section should be read in conjunction with Paper 4.

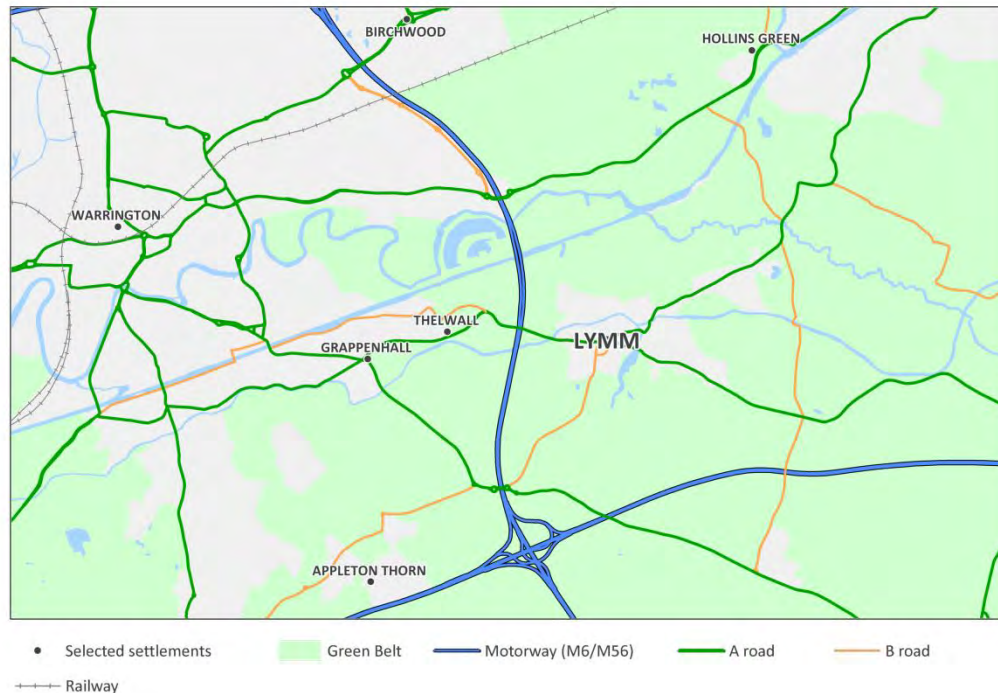
Lymm

- 7.4 The following assessment considers a growth scenario for Lymm which reflects the combination of the following:
- Retaining the existing proposed housing allocations (Sites OS5, OS6, OS7) – 430 units
 - Retaining the urban capacity taken from SHLAA – 68 units
 - Allocation of an additional site during the plan period (land to the east of allocation OS7) – 112 units (Peel's proposal)
 - A potential allocation of an additional site as safeguarded land to meet needs beyond the plan period (land to the south of the area proposed for allocation by Peel) – 112 units (Peel's proposal)
- 7.5 The following therefore tests the scenario of Lymm delivering **610** residential dwellings during the plan period (an increase of 112 on the PSLP proposal), with provision made for an additional 112 units beyond the plan period.
- 7.6 This would represent an increase in the number of dwellings within Lymm of approximately 12% over a 20 year plan period.

Lymm in context

- 7.7 As illustrated in the following plan, the settlement of Lymm is situated to the east of Warrington, in close proximity to both the M56 and M6. The settlement is bounded by the North West Green Belt, which surrounds the urban area on all sides.

Figure 7.1: Location of Lymm



Source: Turley, 2019

Peel's proposal at Lymm

- 7.8 Peel's proposes the release of land to the east of Tanyard Farm from the Green Belt and its allocation for a mix of housing for development during the plan period (112 units) **and** an area of either safeguarded land to meet development needs beyond the plan period (also with capacity for 112 dwellings) or a Green Wedge (or similar) policy designation if it were felt that this land should be kept free from development (see coverage of appeal reference xxx below). The site proposed for release by Peel is located immediately to the east of land proposed for allocation through the PSLP (site allocation OS7).
- 7.9 Peel's proposed policy treatment for this area of land is presented in Appendix 3.
- 7.10 Peel's development proposal for this land is articulated through a detailed Development Prospectus which shows how part of 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

7.11 The land proposed by Peel for release for development during the plan period is entirely within Peel's control. The land is therefore available.

7.12 It should be noted that Peel's proposals differ from what it has previously put forward through representations to the Local Plan and reflect the outcome of a further appraisal of the site's constraints and opportunities, including in respect of the matters revealed through the appeal referred to below. Previously Peel presented a proposal for the release and full development of land corresponding to Green Belt Parcel LY16 as defined through the Council's Green Belt Assessment (2016). Peel now proposes only the partial development of this area. This is considered below.

The approach to Green Belt Parcel LY16

7.13 The allocation proposed by Peel forms part of an area of Green Belt land (Green Belt Parcel LY16 as noted) which is physically well contained by the Bridgewater Canal along its southern boundary and residential development along the majority of the rest of its boundaries. This area has limited visibility from public view points, with the exception of the western most land which has a direct interface with Rushgreen Road and where the residential development between the area of Green Belt and the Rushgreen Road is generally more sparse.

7.14 Peel has considered the parcel on a comprehensive basis including in the context of the allowed appeal reference APP/M0655/W/18/3200416 which relates to a largely brownfield area of land at Tanyard Farm located immediately to the west of the site proposed for allocation by Peel. Peel's proposal reflects and pays due regard to the findings of the appeal Inspector relating to this area of Green Belt and how its openness may be maintained, to the extent that that is a desirable end.

7.15 The appeal site forms part of proposed allocation OS7, with additional land to the west also included in the allocation.

7.16 The appeal site is shown in the context of the proposed OS7 allocation and Peel's proposed allocation at Figure 7.2 below.



Figure 7.2: Appeal site, proposed allocation OS7 and Peel’s proposal

7.17 The appeal decision notes the value of maintaining an area of open land to the south of the appeal scheme between the southern edge of the development and the Bridgewater Canal in retaining a green gap between Lymm and Oughtrington:

*The Bridgewater Canal runs through this green wedge. The proposed development would be a more concentrated and suburban form of development than currently exists on the site and its overall mass and bulk would extend further south. However, the new housing would be visually contained by existing landscape features. In addition, the appeal proposal would provide an opportunity to rationalise development over the whole of the site and secure a corridor of open space between the proposed housing development and the Canal. The proposed open space, which includes PDL, would be accessible to the public and visually and ecologically enhanced. **Moreover, this swathe of open space would remain permanently open, and a gap between Oughtrington and Lymm would be maintained.***

7.18 The appeal therefore permits the development only of the northern part of the site.

7.19 Peel’s approach to Green Belt Parcel LY16 follows the same principle in also retaining a similar area of open land to the north of the canal achieving the same end. In contrast,

the proposed PSLP allocation OS7 conflicts with this is designating land for development up to the canal. The associated policy is generally permissive of development up to the canal.

- 7.20 Land to the west of the appeal site is also more sensitive to development in this regard, being significantly more prominent and visible thus the development of this area would have a greater impact on openness.
- 7.21 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.
- 7.22 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.
- 7.23 It is also important to recognise that the development of Peel's site cannot itself reduce any existing gap between built up areas in this location given the presence of the appeal scheme. The appeal scheme effectively acts as a barrier to the encroachment of development located to the east of the appeal site (as is Peel's proposal) into any retained gap.

Testing the settlement growth scenario

- 7.24 A settlement growth scenario of 610 dwellings being provided during the plan period, including through the release of land to the east of Tanyard Farm for this purpose (providing 112 units) with provision made for a potential further a 112 units beyond the plan period, is subject to further assessment below.
- 7.25 It should be noted that this would represent 12% increase in the number of dwellings within Lymm.

Accessibility and promoting sustainable transport

- 7.26 Lymm is a highly sustainable location for growth, being the largest Outlying Settlement in the Borough and served by a large Centre. It is a key service centre serving a number of other Outlying Settlements. It contains a broad range of services including a high school, three primary schools, two supermarkets, post office, banks, pubs, youth centre library and a range of recreational facilities. Lymm benefits from a half hourly bus service connecting it to Warrington and settlement also provides a range of everyday services.

Land off Rushgreen Road (east of Tanyard Farm)

- 7.27 Peel's proposed development site is well related to these services being located within 1.2 km of the Centre. It benefits from a significant interface with the settlement and

provides several points of physical connection into the settlement, meaning a pedestrian and cycle friendly form of development can be delivered, promoting sustainable transport options and helping achieve an effective integration into the settlement.

- 7.28 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 Council's 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. This is considered in more detail within Paper 4.

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, thus helping to mitigate congestion on the road network. There are no accessibility constraints to the expansion of Lymm to deliver 610 dwellings during the plan period plus provision of some growth beyond this. In this context, Peel's site east of Tanyard Farm represents a sustainable site for development as part of this increased allocation for the settlement. The proposal for additional growth in Culcheth would not conflict with Objective W4 of the PSLP.

Green Belt

- 7.29 The defined General Areas of Green Belt around Lymm are deemed to make a moderate contribution to the Green Belt. Therefore 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.
- 7.30 It is noted that General Areas of Green Belt which make a moderate contribution to the Green Belt are also proposed for release from the Green Belt to the south of Warrington, and elsewhere, to deliver the PSLP development needs. This establishes that the release of land making this level of contribution is necessary and acceptable in the context of PSLP Objective W2.
- 7.31 The further growth of Lymm to the extent assessed by Peel will not be reliant on utilising Green Belt land which makes any greater contribution than the land proposed for release elsewhere through the PSLP therefore. The further expansion of Lymm would not offend strategic Objective W2 any more than options for delivering this growth within alternative locations.

Green Belt Parcel LY16

- 7.32 It is noted that 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 overall contribution to the Green Belt through the 2017 Green Belt Assessment Addendum. The weak Green Belt contribution is reinforced by the grant of planning permission for the development of land to west, as considered above. Evidently, the release of this site would have a lesser adverse impact on the Green Belt than a number of other sites selected for release and allocation across the Borough which form part of Green Belt parcels which are deemed to make a moderate Green Belt contribution.

The growth of Lymm beyond an incremental level would not result in strategic harm to the Green Belt or affect its long term permanence. There are no Green Belt constraints to the expansion of Lymm to deliver 610 dwellings during the plan period and 112 beyond the plan period. In this context, Peel's site to the east of Tanyard Farm represents a sustainable site for development as part of this increased allocation for the settlement. The proposal for additional growth in Lymm would not conflict with Objective W2 of the PSLP.

Ecology

- 7.33 In respect of the candidate sites for release from the Green Belt, the Council's appraisal notes that most of these are free from ecological constraints.

Land off Rushgreen Road (Land to the east of Tanyard Farm)

- 7.34 In respect of Peel's site, the Preliminary Ecological Assessment submitted alongside the Development Prospectus demonstrates that the site is not affected by any insurmountable ecological constraints and development can be accommodated in an acceptable manner subject to the employment of standard mitigation measures during construction and operation.

The growth of Lymm beyond an incremental level would not result in unacceptable ecological impacts. There are no ecological constraints to the expansion of Lymm to deliver 610 dwellings during the plan period and 112 beyond the plan period. In this context, Peel's site off Rushgreen Road represents a sustainable site for development as part of this increased allocation for the settlement.

Landscape/townscape/character

- 7.35 Although all sites are within the same Landscape Character Type 3: Red Sandstone Escarpment. The allocated sites on the western edge of Lymm (site allocations xx) are in a different Landscape Character Area to site allocation OS7 and the land proposed for allocation by Peel, located to the east. This 'spread' would result in a reduced cumulative effect on landscape character if all sites were allocated. 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 thus reducing cumulative visual effects.
- 7.36 To the extent that there would be any cumulative landscape/townscape/character impact arising from the development of Peel's proposed site east of Tanyard Farm and the proposed draft allocation to west (Site Allocation OS7) the development of the land to the west of the appeal site would evidently be the greater contributor to this given its visible prominence from public view points and the site's potential role in retaining a gap between Lymm and Oughtrington. Due to its discreet location, reinforced by the physical presence of the appeal scheme, the development of land to the east will not have any adverse impacts in this regard. Moreover, due to the appeal scheme (as a committed development) bisecting the balance of site allocation OS7 as proposed and Peel's proposal for land to the east, there will be limited, if any, inter-visibility between a developments either side of the appeal scheme in the scenario of a larger Green Belt release in this location.

Green Belt Parcel LY16 and land east of Tanyard Farm

- 7.37 The Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal Landscape Appraisal undertaken by Randall Thorp and submitted alongside the Development Prospectus considers the full development of the Parcel LY16 area.
- 7.38 It demonstrates, through a full assessment, a well-designed development, that preserves and enhances the existing landscape features and Public Rights of Way within a green infrastructure network and responds sensitively to the adjacent heritage assets and townscape, would avoid any significant effects on the character of Lymm or the wider landscape of the study area.
- 7.39 The submitted Development Prospectus outlines how this will be achieved in respect of Peel's proposal to for land off Rushgreen Road (land east of Tanyard Farm) through the masterplan approach presented as informed by the guiding principles set out in the Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal Landscape Appraisal.

The growth of Lymm beyond an incremental level would not therefore result in unacceptable landscape, townscape and character impacts. There are no such constraints to the expansion of Lymm to deliver 610 dwellings during the plan period and 300 beyond the plan period. In this context, Peel's site east of Tanyard Farm represents a sustainable site for development as part of an increased allocation for the settlement.

Education

- 7.40 Based on a review of the current position, education capacity is not considered to represent an insurmountable issue that would restrict a modest level of additional growth in Lymm beyond that proposed within the PSLP.
- 7.41 With specific reference to secondary schools, this has been considered in greater detail in Appendix 8, recognising that the settlement is served by Lymm High School. Whilst the school is forecast to have limited capacity in future years, a significant number of its pupils travel to the school from beyond Warrington, as with Culcheth High School. An increased level of housing development within Lymm would again simply serve to reduce the school's catchment area over time to a more natural scale, requiring future pupils beyond Warrington to look to their own local authority areas to meet their education requirements.
- 7.42 Equally, the proposed provision of a new high school associated with the Garden Suburb will over the course of the plan period, potentially impact on demand for places at Lymm High School, noting that the latter currently attracts pupils from within the proximate parts of the Warrington urban area. The provision of a new school within the Garden Suburb would be expected to reduce the number of pupils travelling from those proximate parts of the existing urban area to Lymm, where the new school would present a more accessible option. Collectively, again, on this basis there is no justification for restricting the further growth of Lymm beyond incremental levels on the basis of secondary school capacity at the current point in time.

7.43 Furthermore, although it is recognised that there is limited surplus capacity in Lymm’s primary schools at present²⁰, the Council has previously confirmed that Cherry Tree Primary School could be expanded beyond its current size²¹ (1FE). An expansion to 2FE would create 210 new places, which would accommodate the demand generated by 700 new homes based on the Council’s own multipliers²². As such, this could accommodate demand generated by the provision of 610 homes within the plan period.

In conclusion, the growth of Lymm beyond an incremental level is not constrained by the capacity of education facilities serving the settlement, with mitigation options available if needed. There are no education related constraints to the expansion of Lymm to deliver 610 dwellings during the plan period and 112 beyond the plan period. In this context, Peel’s site off Rushgreen Road represents a sustainable site for development as part of this increased allocation for the settlement. Insofar as education provision is concerned, the proposal for additional growth in Lymm would not conflict with Objective W4 of the PSLP.

Consideration of benefits

More effectively addressing the consistently high cost of housing in Lymm and increasing the stock of affordable housing

- 7.44 Lymm is defined by the particularly high cost of housing, where house prices have consistently exceeded the borough average and are also high in the context of the wider markets – encompassing Cheshire and other parts of Mid Mersey – in which it is located²³. There is evidence to suggest that the recent moderation in the rate of housing growth²⁴ has coincided with an increase in market activity, which has further elevated average house prices over recent years. The result is that when applying reasonable assumptions on mortgage repayments, an income of circa £44,000 per annum is likely to be required to purchase entry level housing in Lymm²⁵. Data from the Annual Survey of Hours and Earnings (ASHE) shows that fewer than 25% of full-time employees working or living anywhere in Warrington earn such an amount annually²⁶.
- 7.45 Even when this annual cost is evenly split between two individuals assumed to be in full-time employment, the income required exceeds that earned by over 30% of those working or living in Warrington²⁷. This suggests that households containing fewer than two full-time employed residents are likely to face difficulties in accessing the local

²⁰ See Appendix 7, Table 2

²¹ Warrington Borough Council (2017) Settlement Profiles: Outlying Settlements

²² The Planning Obligations SPD (January 2017) specifies a primary school pupil yield of 0.3 children per dwelling

²³ See Appendix 7, Figure 2

²⁴ See Appendix 7, Figure 3

²⁵ Assumed 5% deposit, with repayment over 25 years at a fixed interest rate of 5%. This falls within the range of mortgages currently available for first-time buyers (2.9 – 5.8%) as of June 2018, based on a review of comparison website Money Supermarket. It is based on the lower quartile price paid (£220,500) in Lymm in 2018

²⁶ ONS (2017) Annual Survey of Hours and Earnings; Gross annual earnings at the upper quartile were £39,662 for those living in Warrington, and £39,044 for those working in the borough. Each fall below the income required to purchase in Lymm (£44,000)

²⁷ Gross annual earnings at the third decile was £21,245 for those living in Warrington, and £21,178 for those working in the borough. Each fall below the income required to cover half of the cost of purchasing in Lymm (£22,000)

housing market, and indeed such households may themselves face challenges where one or both is in comparatively low paid employment.

- 7.46 While the private rented sector plays a role in meeting housing needs in Lymm, it is notable that there is an underrepresentation of socially renting households in the settlement²⁸. The high cost of purchasing housing in Lymm represents a significant challenge to its future sustainability. It is likely to already be leading to local people being forced to move elsewhere in the absence of affordable housing in the local market, potentially eroding established family and community ties and impacting upon the wider demographic profile of the community.
- 7.47 The PSLP proposes that Lymm will see its stock grow by 10%, a growth of 498 additional homes. Where it is assumed, as per the draft policies, that 30% of this housing would be affordable, this represents 149 additional affordable homes over the plan period. Where Peel's additional provision was included this would elevate the level of affordable housing to a total of 183 new homes. Evidently where it is accepted that affordability is a significant issue for Lymm increasing the provision of affordable homes, by 34, would represent an additional and enhanced benefit.
- 7.48 The provision of additional affordable homes would also assist to a greater extent in introducing a wider mix of housing assisting in turn to the delivery of a mix of housing to meet high need pressures.

Sustaining the local labour force

- 7.49 The local economy of Lymm provided employment for over 1,800 people at the 2011 Census. These jobs were predominantly concentrated in the village centre and around Lymm High School, with commercial premises in the village largely orientated towards retail units and offices. Approximately one third of jobs in Lymm were filled by its residents. Local employers therefore require at least some local labour, relying on in-commuters from other parts of the borough and further afield when this is not available.
- 7.50 There is evidence of an ageing population trend in Lymm²⁹. As with the analysis presented for Culcheth, Edge Analytics has modelled the impact of constraining population and household growth to the PSLP's proposed 498 additional homes³⁰.
- 7.51 This indicates that the population aged 65+ is forecast to increase by 37% over the next 20 years (2017 – 2037), whilst the core working population (30-64 years old) is set to decrease by 17% compared to 2017. Such a profile suggests that the 'capping' of provision could have a detrimental impact on the vitality of the settlement and the prospects for local businesses to source labour from within Lymm. The provision of additional housing could reasonably be expected to assist in offsetting this future profile where it is recognised that retaining a more balanced profile is preferential

²⁸ The 2011 Census confirms that 8% of households in Lymm lived in the social rented sector, compared to 16% across Warrington

²⁹ See Appendix 7, Figure 4

³⁰ See Appendix 9, Table 4

Sustaining demand for the local retail offer

- 7.52 Analysis of the current retail offer reveals that there are relatively low vacancy rates, indicating that the centre has a good level of vitality and a positive business environment³¹. The challenge going forward will be to ensure that this vitality is maintained recognising the important role that the centre has for other smaller proximate outlying settlements. The changing age profile of the settlement referenced above will have an important bearing on the prospects of this vitality being maintained with a higher level of new housing enabling a more pronounced increase in population and associated spending power to contribute to addressing the risk associated.

CONCLUSION - 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 East of Tanyard Farm represents a sustainable development opportunity, not affected by any constraints that cannot be mitigated and using land which makes a weak contribution to the Green Belt. It should be allocated for development for 112 dwellings during plan period. The land immediately to the south should be considered as an allocation of safeguarded land to meet development needs beyond the plan period or otherwise should be designated as a Green Wedge or similar if deemed necessary to retain its openness.

Croft

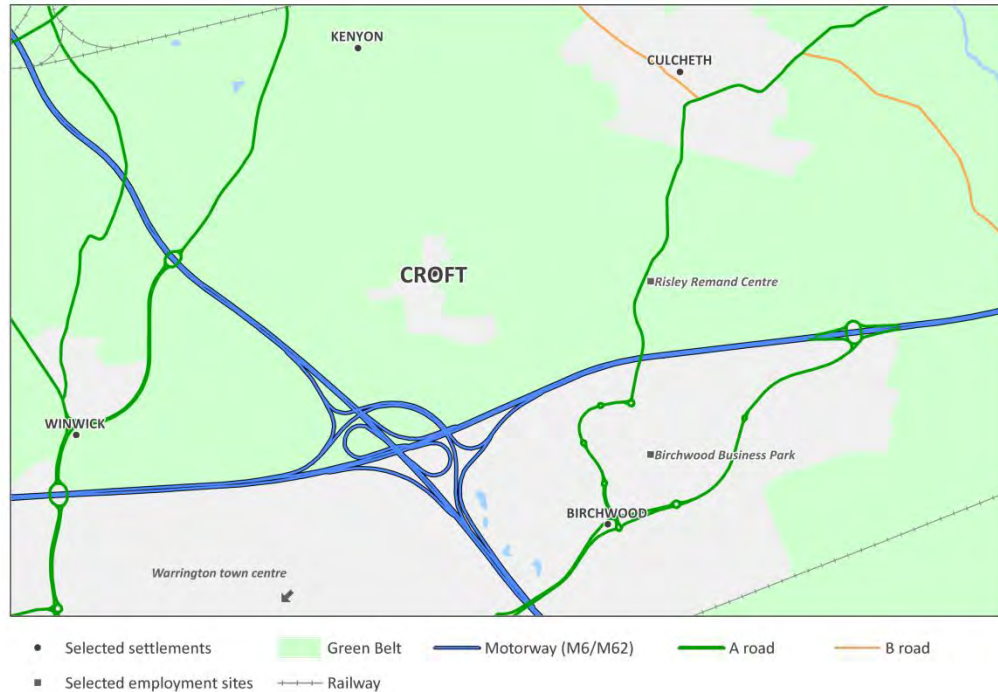
- 7.53 Peel's assessment considers a growth scenario for Croft which reflects the combination of the following:
- Retaining the existing proposed housing allocation (Sites OS2) – 75 units
 - Retaining the urban capacity taken from SHLAA – 0 units
 - Allocation of an additional site during the plan period (land off Lady Lane) – 195 (Peel's proposal)
- 7.54 The following therefore tests the scenario of Croft delivering 270 residential dwellings during the plan period (an increase of 195 units on the PSLP proposal).
- 7.55 Whilst presenting a proposal for the allocation of a site at Lady Lane for the development of 195 dwellings during the plan period, and testing a settlement growth scenario which includes this, the Development Prospectus submitted for this site presents an alternative proposal comprising a plan period allocation for 83 dwellings, with the balance of the site (112 dwellings) safeguarded to meet development needs beyond the plan period and with a capacity of 195 dwellings. This provides an alternative approach to this site in addressing the soundness issues raised within Peel's representation, noting that the PSLP's failure to allocate safeguarded land to ensure the Green Belt endures over the long term is one such point of unsoundness raised.

³¹ The vacancy rate across Lymm village centre is 10.94% which is lower than the Goad (December 2017) national average of 12.22%.

Croft in context

- 7.56 As illustrated in the following plan, the settlement of Croft is situated on the northern edge of the borough and in close proximity to the 'Croft Interchange' junction of the M62/M6. Croft is also in close proximity and benefits from close road links to the highly successful Birchwood Business Park. The settlement is bounded by the North West Green Belt, which surrounds the urban area on all sides.

Figure 7.2: Location of Croft



Source: Turley, 2019

Peel's proposal

- 7.57 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.
- 7.58 Peel's 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

7.59 As noted above, the Development Prospectus shows an alternative proposal for this site comprising a plan period allocation of 83 dwellings with the balance of the site designated as safeguarded land to meet needs beyond the plan period and with a capacity for 112 dwellings.

7.60 Peel's full development proposal for this site is presented at Appendix 5 of this Paper

Testing the settlement growth scenario

7.61 A settlement growth scenario of 270 dwellings being provided during the plan period, including through the release of land to the west of Lady Lane for this purpose (providing 195 units) is subject to further assessment below.

7.62 Provision at this level would represent a c45% increase in the dwelling stock within Croft. The alternative proposal presented by Peel in respect of its site at Lady Lane (83 dwellings during the plan period) would result in a total of 158 dwellings being provided within Croft, representing a c26% increase in the number of dwellings within the settlement during the plan period.

Accessibility and promoting sustainable transport

7.63 Croft is a sustainable location for growth, being located within the northern part of the Borough and accessible to a number of key employment areas in the Borough, including Omega and Birchwood Park. A higher level of growth in this location will support the achievement of a more effective physical co-location of housing and employment and thus promoting more sustainable transport choices (and shorter car journeys where needed) to access employment. This is in the context of a clear under provision of housing in the north of the Borough as proposed through the PSLP.

7.64 Croft benefits from an hourly bus service connecting it to Warrington and settlement also provides a range of everyday services, including two primary schools, a convenience store, public transport routes, a public house, youth centre and a range of recreational facilities.

Land at Lady Lane

7.65 Peel's proposed development site is well related to these services, being located immediately to the north east of the settlement. It benefits from a significant interface with the settlement and several points of physical connection into the settlement and thus achieving a successful integration into the existing urban area.

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, thus helping to mitigate congestion on the road network. There are no accessibility constraints to the expansion of Croft to deliver 270 (or in the alternative scenario presented by Peel, 158 dwellings during the plan period with provision made for 112 dwellings in the post-plan period). In this context, Peel's site off Lady Lane represents a sustainable site for development as part of this increased

allocation for the settlement. The proposal for additional growth in Croft would not conflict with Objective W4 of the PSLP.

Green Belt

- 7.66 The defined General Areas of Green Belt around Croft are deemed to make a moderate contribution to the Green Belt. Therefore 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.
- 7.67 It is noted that General Areas of Green Belt which make a moderate contribution to the Green Belt are also proposed for release from the Green Belt to the south of Warrington, and elsewhere, to deliver the PSLP development needs. This establishes that the release of land making this level of contribution is necessary and acceptable in the context of PSLP Objective W2.
- 7.68 The further growth of Croft to the extent assessed by Peel will not be reliant on utilising Green Belt land which makes any greater contribution than the land proposed for release elsewhere through the PSLP therefore. The further expansion of Croft would not offend strategic Objective W2 any more than options for delivering this growth within alternative locations.

Land at Lady Lane

- 7.69 It is noted that 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. Parcels which make a moderate contribution to the Green Belt are proposed for release to the south of Warrington and elsewhere to deliver their development needs. Thus as a general rule, the release of Green Belt sites which make this level of contribution is deemed to be acceptable and necessary by the Council and to be compatible with Objective W2 of the PSLP.

The growth of Croft beyond an incremental level would not result in strategic harm to the Green Belt or affect its long term permanence. There are no Green Belt constraints to the expansion of Croft to deliver 270 dwellings during the plan period. In this context, Peel's site off Lady Lane represents a sustainable site for development as part of this increased allocation for the settlement. The proposal for additional growth in Croft would not conflict with Objective W2 of the PSLP.

Ecology

- 7.70 In respect of the candidate sites for release from the Green Belt, the Council's appraisal notes that most of these are free from ecological constraints.

Lady at Lady Lane

- 7.71 In respect of Peel's site, the Preliminary Ecological Assessment submitted alongside the Development Prospectus demonstrates that the site is not affected by any insurmountable ecological constraints and development can be accommodated in an acceptable manner subject to the employment of standard mitigation measures during construction and operation. Critically Peel's proposal avoids the development of the

area of woodland to the west of its site which is identified as a Local Wildlife Site within the Council's appraisal of this site as a potential allocation³²

The growth of Croft beyond an incremental level would not result in unacceptable ecological impacts. There are no ecological constraints to the expansion of Croft to deliver 270 dwellings during the plan period or in the alternative scenario presented by Peel, 158 dwellings during the plan period with provision made for 112 dwellings in the post-plan period. In this context, Peel's site off Lady Lane represents a sustainable site for development as part of this increased allocation for the settlement.

Agricultural land

- 7.72 In respect of the candidate sites for release from the Green Belt, the Council's appraisal notes that a number of these are not Best and Most Versatile agricultural land.

Land at Lady Lane

- 7.73 In respect of Peel's site, the technical evidence base submitted with the proposed Development Prospectus demonstrates that only 25% of the site is classed as Best and Most Versatile agricultural land (in this case Grade 3a).

The growth of Croft beyond an incremental level would not result in the significant loss of Best and Most Versatile land. There are no agricultural land constraints to the expansion of Croft to deliver 270 dwellings during the plan or in the alternative scenario presented by Peel, 158 dwellings during the plan period with provision made for 112 dwellings in the post-plan period. In this context, Peel's site at Lady Lane represents a sustainable site for development as part of this increased allocation for the settlement. Insofar as agricultural land is concerned, the proposal for additional growth in Croft would not conflict with Objective W6 of the PSLP.

Landscape/townscape/character

- 7.74 The Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal Landscape Appraisal undertaken by Randall Thorp and submitted alongside the Development Prospectus considers the full development of land to the west of Lady Lane.
- 7.75 It demonstrates, through a full assessment, that a well-designed development that preserves the existing landscape features within a green infrastructure network and responds sensitively to the character of Lady Lane and the setting of the existing Grade II listed Christ's Church adjacent to the eastern boundary of the site would avoid any significant effects on the character of Croft or the wider landscape of the study area. The submitted Development Prospectus outlines how this will be achieved in respect of Peel's proposal through the masterplan approach presented as informed by the guiding principles set out in the Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal Landscape Appraisal.

The growth of Croft beyond an incremental level would not therefore result in unacceptable landscape, townscape and character impacts. There are no such

³² Warrington Local Plan Site Assessment Proformas report (Warrington Borough Council 2018)

constraints to the expansion of Croft to deliver 270 dwellings during the plan period or in the alternative scenario presented by Peel, 158 dwellings during the plan period with provision made for 112 dwellings in the post-plan period. In this context, Peel's site at Lady Lane represents a sustainable site for development as part of this increased allocation for the settlement.

Education

- 7.76 Pupils in Croft currently show a strong propensity to attend Culcheth High School to access secondary education provision³³. The conclusions reached in section 6 with regards to the availability of future capacity to accommodate moderate levels of growth are therefore pertinent. In contrast to the Council's assessment, it is therefore considered that secondary school capacity does not represent a constraint on Croft seeing further growth, as proposed by the delivery of Peel's land.
- 7.77 Looking separately at primary school provision, whilst Croft is comparatively modest in size, it is the location of two primary schools, St Lewis Catholic Primary School and Croft Primary School, each of which are 1 form entry. There is currently a small deficit of places across the two schools, albeit this relates to only one school with the other having 15 spare places³⁴.
- 7.78 Acknowledging the size of Croft's population, the two primary schools are likely to serve settlements and communities beyond Croft, with such wider factors therefore influencing changes in the availability of places at the schools. It is important, in this context, to observe that across the North East Warrington primary school planning area, which covers 7 primary schools, forecasts suggest an anticipated 8.7% decline across this wider geography over the next 5 years³⁵. This will, in no small part, be likely to be influenced by the comparative modest levels of growth in new housing across smaller settlements from which pupils travel.
- 7.79 Demand generated by new housing can therefore secure the long-term viability of the two primary schools in Croft, which – though currently at capacity – *'both...have some potential for on-site expansion to provide an additional half form entry'*³⁶ where necessary to respond to demand. Where provision was made for 270 homes over the plan period, as proposed by Peel, a demand for circa 81 places could be generated, reducing to circa 47 places where only 158 homes came forward by 2037. This could be accommodated through the expansion of one, or both, primary school(s), where necessary. This indicates that primary school capacity need not act as a constraint to growth within Croft itself.

In conclusion, the growth of Croft beyond an incremental level is not constrained by the capacity of education facilities serving the settlement, with mitigation options available if needed. There are no education related constraints to the expansion of Croft to deliver 270 dwellings or in the alternative scenario presented by Peel, 158 dwellings during the plan period with provision made for 112 dwellings in the post-

³³ Data provided by Warrington Borough Council (June 2018) shows that secondary age children in Croft attend two schools; Culcheth High School and Birchwood Community High School. Overall 96% of secondary school age children attend Culcheth High School and 4% attend Birchwood Community High School.

³⁴ See Appendix 7, Table 3

³⁵ Department for Education (2017) School Capacity Survey 2016-2017

³⁶ Warrington Borough Council (2017) Settlement Profiles: Outlying Settlements, p15

plan period. In this context, Peel’s site off Manchester Road represents a sustainable site for development as part of this increased allocation for the settlement. Insofar as education provision is concerned, the proposal for additional growth in Croft would not conflict with Objective W4 of the PSLP.

Consideration of benefits

Alleviating recent imbalance between housing supply and demand

- 7.80 The price paid for housing in Croft has increased markedly in recent years, to circa £303,000 in 2018. This is some 41% higher than the borough average, having risen at double the rate of house prices across the wider borough over the past five years³⁷ (41/19%). As such, and as in Lymm, it will therefore be challenging for those on lower incomes to access housing in Croft, and this has only been exacerbated by the failure to provide any meaningful level of new housing growth over the recent historic period³⁸.
- 7.81 The PSLP proposes that Croft will see its stock grow by 14%, a growth of 83 additional homes and higher than the cap of 10% established by the Council as representing incremental growth across the outlying settlements. This proportionately stronger growth is directly related to the small size of the settlement. Where it is assumed, as per the draft policies, that 30% of this housing would be affordable this would only represent 25 additional affordable homes over the plan period.
- 7.82 This level of growth, and in particular the limited quantum of new affordable housing proposed, would not be expected to have a significant impact on addressing clear evidence of increasing affordability issues in the settlement. Providing for additional housing recognising the opportunity provided by Peel’s proposal would, however, present a much more significant opportunity to deliver additional affordable housing and contribute to improving the mix of housing available for existing and future residents. Indeed the provision of 270 homes in the settlement would potentially facilitate the delivery of 81 affordable homes, under the same assumptions. This would enable the settlement to have a more mixed profile of housing tenures therefore offering greater opportunities for those on lower incomes to remain and move within the settlement. Even where the amount of housing over the plan period was reduced to 158 homes, where an element of Peel’s land is safeguarded rather than being delivered in the plan period, this would still support the delivery of a more pronounced increase of some 47 affordable homes almost double that implied under the PSLP.

Enabling a more marked growth in the working age population

- 7.83 There is evidence of a marked ageing trend looking at population change between 2001 and 2017. Within this timeframe, the population aged 65 years and over has increased by 25% and the population aged 30-44 years has decreased by 37% in Croft³⁹.
- 7.84 Modelling provided by Edge Analytics confirms that the addition of 83 homes, as proposed under the PSLP, would assist in addressing this trend, albeit by the end of the

³⁷ See Appendix 7, Table 4

³⁸ See Appendix 7, Figure 5

³⁹ See Appendix 7, Figure 6

plan period the working age population of Croft would remain smaller than recorded in 2001, and the older population would be some 48% larger⁴⁰.

- 7.85 Recognising the size of Croft, the suggested levels of additional development would be expected to have a direct and positive impact on the balance of the changing population profile where it is considered that it is preferential for the ratio of working-age to older households is to be maintained or indeed improved, rather than worsen.

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

- 7.86 The Croft Parish Plan notes that: *“the parish has a thriving and active community made possible by the presence of the Memorial Village Hall, the Croft Youth Activity Centre (CYAC) and Christ Church Parish Hall”*⁴¹. The long-term implications of the changing demographic outlined above, without a material increase in new homes could, however, represent a challenge for maintaining this positive aspect of the community.
- 7.87 The provision of a greater level of new housing and associated population presents the opportunity to reinforce the ongoing viability of existing facilities and, depending on the scale of growth, potentially to attract new facilities into the settlement to elevate its offer and its sustainability as a place to live.

CONCLUSION - 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 any insurmountable constraints and avoiding land which makes a strategic contribution to the Green Belt. It should be allocated for development for either 195 dwellings during the plan period or, as an alternative, for 83 dwellings during the plan period with the balance subject to a safeguarded land designation with capacity for a further 112 dwellings to be delivered beyond the current plan period, reflecting the need for the allocation of safeguarded land within the Outlying Settlements evidenced through Peel’s Paper 2 submission.

Hollins Green

- 7.88 Peel’s assessment considers a growth scenario for Hollins Green which reflects the combination of the following:
- Retaining the existing proposed housing allocation (Sites OS4) – 90 units
 - Retaining the urban capacity taken from SHLAA – 0 units
 - Allocation of an additional site during the plan period (land off Manchester Road) – 292 units

⁴⁰ See Appendix 9, Table 2

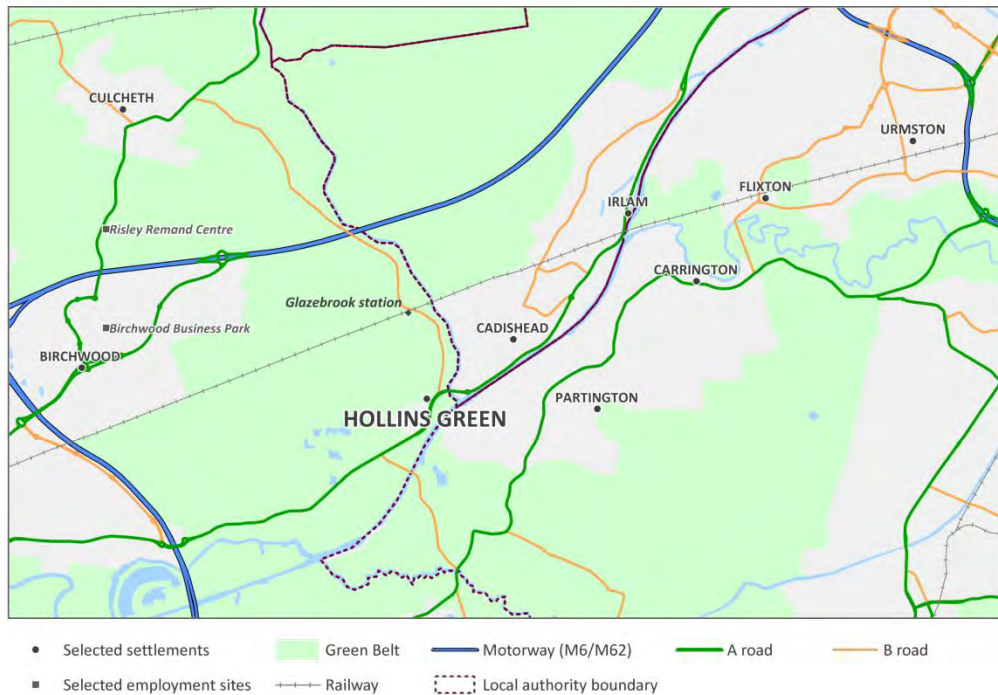
⁴¹ Croft Parish Council (2018) Croft Parish Plan

- 7.89 The following therefore tests the scenario of Hollins Green delivering 382 residential dwellings during the plan period (an increase of 292 units on the PSLP proposal).
- 7.90 Whilst presenting a proposal for the allocation of a site at Manchester Road for the development of 292 dwellings during the plan period, and testing a settlement growth scenario which includes this, the Development Prospectus submitted for this site presents an alternative proposal comprising a plan period allocation for 93 dwellings, with the balance of the site safeguarded to meet development needs beyond the plan period and with a capacity of 199 dwellings. This provides an alternative approach to this site in addressing the soundness issues raised within Peel’s representation, noting that the PSLP’s failure to allocate safeguarded land to ensure the Green Belt endures over the long term is one such point of unsoundness raised.

Hollins Green in Context

- 7.91 As illustrated in the following plan, the settlement of Hollins Green is situated to the north east of Warrington town. It has good connections to Glazebrook rail station and is also located in comparatively close proximity to the highly successful Birchwood Business Park. The settlement is bounded by the North West Green Belt, which surrounds the urban area on all sides.

Figure 7.3: Location of Hollins Green



Source: Turley, 2019

Peel’s proposal

- 7.92 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, all through the release of land within the Green Belt.

7.93 Peel's 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

7.94 As noted above, the Development Prospectus shows an alternative proposal for this site comprising a plan period allocation of 93 dwellings with the balance of the site designated as safeguarded land to meet needs beyond the plan period and with a capacity for 199 dwellings.

Testing the growth scenario

7.95 A settlement growth scenario of 382 dwellings being provided during the plan period, including through the release of land at Manchester Road for this purpose (providing 292 units during the plan period) is subject to further assessment below.

7.96 Peel considers that Hollins Green can accommodate this level of growth in a sustainable manner.

7.97 Provision at this level would represent a c103% increase in dwelling stock within Hollins Green. The alternative proposal presented by Peel in respect of its site at Manchester Road (93 dwellings during the plan period with provision made for an allocation to deliver development beyond the plan period through a safeguarded land designation) would result in a total of 183 dwellings being provided within Hollins Green, representing a c49% increase in the number of dwellings within the settlement during the plan period.

Accessibility and promoting sustainable transport

7.98 Hollins Green occupies an accessible location at the south eastern gateway to Warrington and fronting the A57 Manchester Road providing a connection to the western parts of Greater Manchester and employment opportunities in the surrounding area (including at Irlam and Port Salford).

7.99 The settlement is served by a half hourly bus providing a connection to both Manchester and Warrington. The settlement provides a range of every day facilities and services including a primary school and a pre-school, a post office, two pubs and a

range of recreational facilities. It represents a sustainable location for a relatively modest scale of growth as proposed by Peel.

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, thus helping to mitigate congestion on the road network. There are no accessibility constraints to the expansion of Hollins Green to deliver 382 dwellings during the plan period or in the alternative scenario presented by Peel, 183 dwellings during the plan period with provision made for 199 dwellings in the post-plan period. In this context, Peel's site off Manchester Road represents a sustainable site for development as part of this increased allocation for the settlement. The proposal for additional growth in Croft would not conflict with Objective W4 of the PSLP.

Green Belt

- 7.100 The defined General Areas of Green Belt around Hollins Green are deemed to make a moderate contribution to the Green Belt. Therefore 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.
- 7.101 It is noted that General Areas of Green Belt which make a moderate contribution to the Green Belt are also proposed for release from the Green Belt to the south of Warrington, and elsewhere, to deliver the PSLP development needs. This establishes that the release of land making this level of contribution is necessary and acceptable in the context of PSLP Objective W2.
- 7.102 The further growth of Hollins Green to the extent assessed by Peel will not be reliant on utilising Green Belt land which makes any greater contribution than the land proposed for release elsewhere through the PSLP therefore. The further expansion of Hollins Green would not offend strategic Objective W2 any more than options for delivering this growth within alternative locations.

Land at Manchester Road

- 7.103 It is noted that the site promoted by Peel forms part of a defined Green Belt parcel (HG6 which is deemed by the Council to make a weak overall contribution to the Green Belt through the 2017 Green Belt Assessment Addendum. Evidently, the release of this site would have a lesser adverse impact on the Green Belt than a number of other sites selected for release and allocation across the Borough which form part of Green Belt parcels which are deemed to make a moderate Green Belt contribution.

The growth of Hollins Green beyond an incremental level would not result in strategic harm to the Green Belt or affect its long term permanence. There are no Green Belt constraints to the expansion of Hollins Green to deliver 382 dwellings during the plan period or in the alternative scenario presented by Peel, 183 dwellings during the plan period with provision made for 199 dwellings in the post-plan period. In this context, Peel's site off Manchester Road represents a sustainable site for development as part of this increased allocation for the settlement. The proposal for additional growth in Hollins Green would not conflict with Objective W2 of the PSLP.

Ecology

- 7.104 In respect of the candidate sites for release from the Green Belt, the Council's appraisal notes that most of these are free from ecological constraints.

Land at Manchester Road

- 7.105 In respect of Peel's site, the Preliminary Ecological Assessment submitted alongside the Development Prospectus demonstrates that the site is not affected by any insurmountable ecological constraints and development can be accommodated in an acceptable manner subject to the employment of standard mitigation measures during construction and operation.

The growth of Hollins Green beyond an incremental level would not result in unacceptable ecological impacts. There are no ecological constraints to the expansion of Croft to deliver 382 dwellings during the plan period or in the alternative scenario presented by Peel, 183 dwellings during the plan period with provision made for 199 dwellings in the post-plan period. In this context, Peel's site off Manchester Road represents a sustainable site for development as part of this increased allocation for the settlement.

Agricultural land

- 7.106 In respect of the candidate sites for release from the Green Belt, the Council's appraisal notes that a number of these are not Best and Most Versatile agricultural land.

Land at Manchester Road

- 7.107 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).

The growth of Hollins Green beyond an incremental level would not result in the significant loss of Best and Most Versatile land. There are no agricultural land constraints to the expansion of Hollins Green to deliver 382 dwellings during the plan or in the alternative scenario presented by Peel, 183 dwellings during the plan period with provision made for 199 dwellings in the post-plan period. In this context, Peel's site at Manchester Road represents a sustainable site for development as part of this increased allocation for the settlement. Insofar as agricultural land is concerned, the proposal for additional growth in Hollins Green would not conflict with Objective W6 of the PSLP.

Landscape/townscape/character

- 7.108 There is limited visual connectivity between the proposed allocated site (site allocation OS4) and Peel's proposed site at Manchester Road 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.
- 7.109 The limited visual connectivity and few opportunities to view both sites from a single viewpoint limits any cumulative impact of both sites being brought forward for development 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 also be developed.

Land at Manchester Road

- 7.110 The Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal Landscape Appraisal undertaken by Randall Thorp and submitted alongside the Development Prospectus considers the full development of land at Manchester Road.
- 7.111 It demonstrates, through a full assessment, 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 of the site would have any significant effects on the character and townscape of the surrounding landscape. With appropriate good design and well thought out landscape mitigation measures, it would be possible to develop the site whilst avoiding any potentially significant effects on the visual amenity of the surrounding receptors.
- 7.112 The submitted Development Prospectus outlines how this will be achieved in respect of Peel's proposal through the masterplan approach presented as informed by the guiding principles set out in the Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal Landscape Appraisal.

The growth of Hollins Green beyond an incremental level would not therefore result in unacceptable landscape, townscape and character impacts. constraints to the expansion of Hollins Green to deliver 382 dwellings during the plan or in the alternative scenario presented by Peel, 183 dwellings during the plan period with provision made for 199 dwellings in the post-plan period. In this context, Peel's site at Manchester Road represents a sustainable site for development as part of this increased allocation for the settlement.

Education

- 7.113 Secondary age pupils in Hollins Green attend both Culcheth and Lymm High Schools, with a small number understood to also attend other schools⁴². In the context of the analysis presented to identify potential secondary school capacity both of these high schools at Appendix 8, it is considered that the Council's suggestion that further housing growth cannot be accommodated through surplus capacity in the Outlying Settlements, including Hollins Green in this instances, is not justified or supported by evidence. There is no concern, therefore, that secondary school capacity for the pupils of Hollins Green, existing and/or generated through the provision of new homes, should act as a constraint on the settlement's future modest growth in line with that proposed through the delivery of Peel's land.

⁴² Data obtained from Warrington Borough Council (June 2018) confirms that circa 50 secondary school children from Rixton & Woolston Ward (contains Hollins Green) attend Culcheth High School and circa 30 attend Lymm High School. Following a review of the pupil heat maps on SchoolsGuide.co.uk it evident that a small number of pupils attend, such as Broadoak in Salford.

7.114 The existing Hollins Green Primary School is currently close to capacity⁴³, based on its existing size of 0.6FE, though the PSLP nonetheless proposes a level of growth that would be expected to generate demand for around 27 places⁴⁴. This would increase to around 115 places based on the level of growth proposed by Peel, when retaining the proposed allocations, which equates to around half a form of entry. This would therefore generate the demand and contributions necessary to support an expanded 1FE primary school in Hollins Green. Whilst the Council has previously suggested that the expansion of the school is not straightforward⁴⁵, it is not clear where evidence has been provided to substantiate this position. It is noted that the school is not bounded by existing properties, and the practicalities of expanding should be explored further taking into account the availability of land around the existing school building.

7.115 The growth of Hollins Green beyond the level proposed by the Council through the PSLP therefore presents an opportunity to secure an important benefit for the settlement through providing a more sustainable and viable primary school education offer. Capping growth at low levels will not achieve the same end, though will in itself do less to reduce pressure on the school.

In conclusion, the growth of Hollins Green beyond an incremental level is not constrained by the capacity of education facilities serving the settlement, with mitigation options available if needed. There are no education related constraints to the expansion of Hollins Green to deliver 382 dwellings during the plan period or in the alternative scenario presented by Peel, 183 dwellings during the plan period with provision made for 199 dwellings in the post-plan period. In this context, Peel's site off Manchester Road represents a sustainable site for development as part of this increased allocation for the settlement. Insofar as education provision is concerned, the proposal for additional growth in Hollins Green would not conflict with Objective W4 of the PSLP.

Consideration of benefits

Addressing an increasingly significant imbalance between housing supply and demand

7.116 The supply of new housing in Hollins Green has been extremely limited over recent years, with the Council having confirmed that a single dwelling was completed in the settlement over the decade from 2007 to 2017. This is highly likely to have been a factor influencing the recent acceleration in the price paid for housing, beyond the growth seen across the borough more widely⁴⁶. This is also likely to have been attributable to ongoing demand pressures, recognising the location of the settlement and its accessibility to areas of strong employment growth.

7.117 The PSLP proposes that Hollins Green will see its stock grow by 90 additional homes. Where it is assumed, as per the draft policies, that 30% of this housing would be affordable this only represents 27 additional affordable homes over the plan period. Whilst this would contribute towards creating a more balanced mix of homes within

⁴³ See Appendix 7, Table 5

⁴⁴ The Planning Obligations SPD (January 2017) specifies a primary school pupil yield of 0.3 children per dwelling

⁴⁵ Warrington Outlying Settlements Area Profiles (June 2017)

⁴⁶ See Appendix 7, Figure 7

the settlement where it is acknowledged that there is a pressing need for more affordable homes, in both Hollins Green and across the borough, the opportunity presented by the proposed additional development to support a greater number of affordable homes would present an enhanced benefit. Indeed the expansion of Hollins Green to deliver 382 dwellings over the plan period would provide the opportunity to provide for an additional 115 affordable homes. This would represent a significant contribution to creating a more sustainable balance of tenures within Hollins Green and contribute towards meeting needs more widely.

Providing the housing needed to counter recent demographic changes

- 7.118 The demographic challenges for Hollins Green are even more pronounced than those indicated for Croft and Lymm⁴⁷. Since 2001, the highest proportion of growth has been amongst those aged 65 (49% increase). Conversely, the population aged between 30 and 44 has declined by 22%.
- 7.119 On the basis of the demographic modelling provided by Edge Analytics⁴⁸ the scale of provision envisaged through the PSLP will not address this trend leading to a 60% increase in those aged 65+ and a 11% decline of those aged 30-64.
- 7.120 The provision of additional housing beyond that provided for within the PSLP would offer the opportunity to create a more sustainable demographic profile over the plan period and offset these trends. In turn this would have positive benefits in terms of supporting and potentially enhancing existing social infrastructure within the settlement which otherwise could be subject to real challenges in terms of its future vitality.

CONCLUSION - 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 for either 292 dwellings during the plan period or, as an alternative, for 93 dwellings during the plan period with the balance subject to a safeguarded land designation with capacity for a further 199 dwellings to be delivered beyond the current plan period, reflecting the need for the allocation of safeguarded land within the Outlying Settlements evidenced through Peel's Paper 2 submission.

⁴⁷ See Appendix 7, Figure 8

⁴⁸ See Appendix 9, Table 3

8. Conclusion – implications for soundness and amendments to PSLP required

- 8.1 This paper has started from the conclusion reached in Paper 2 that the Local Plan must make provision for a higher level of housing. As a consequence there is a need to release additional land from the Green Belt.
- 8.2 A critical consideration for the Local Plan going forward is to determine where within the Borough these additional Green Belt releases should take place.
- 8.3 Paper 2 also demonstrates a need for the Local Plan to release land from the Green Belt and designate this as safeguarded to meet development needs beyond the plan period. Sufficient safeguarded land to deliver 11,000 residential units should be allocated of which 1,351 should be allocated adjacent to Outlying Settlements to meet their specific needs beyond 2037.
- 8.4 In the context of this increased housing requirement, this Paper demonstrates that allocating at least a proportion of the plan period ‘headroom’ to the Outlying Settlements would not result in adverse impacts either on the main Warrington urban area or the Outlying Settlements. It also stresses that the elevation of the level of housing provided for in the Outlying Settlements would in itself create benefits in terms of securing a more sustainable future for them. The paper has considered this reallocation on the basis that there is no overriding need for any of this headroom to be directed to the main Warrington urban area.
- 8.5 In evidencing this, it demonstrates that:
- The Council has failed to a sufficient range of reasonable alternatives in relation to the spatial strategy presented and assessed through the Sustainability Appraisal (SA) and the Council’s Development Options and Site Assessment Technical Report (March 2019) and particularly one which reflects a higher level of housing growth than proposed through the PSLP (see Paper 2).
 - In the context of a higher housing requirement than proposed through the PSLP, which should have been presented as a reasonable alternative, there would be no overriding need for any of the additional ‘headroom’ housing requirement to be directed to the main settlement of Warrington, whose needs are met through the allocations proposed through the PSLP as presented. Conflict with key objectives of the PSLP around the regeneration and growth of Warrington would not arise if all or some of this headroom were directed to the Outlying Settlements.
 - There has been no robust assessment of the realistic sustainable capacity of the Outlying Settlements (the point at which growth may begin to cause harm to the Outlying Settlements) in this regard. Insufficient evidence is presented to demonstrate that restricting the growth of these settlements to an incremental level overall (as proposed) is a necessary control to avoid harm and that this represents a sustainable strategy for the settlements.

This is in part due to the failure to consider a more moderated version of Spatial Option 3 (that being an option of greater dispersal of development to the Outlying Settlements) as a reasonable middle ground between the constrained strategy of Spatial Option 2 (as selected) and the strategy of significant growth of the Outlying Settlements which characterises Spatial Option 3.

As a result the options as tested by the Council for the growth of the Outlying Settlements are not able to reveal, with any degree of certainty, whether the Spatial Option 2 is a reasonable strategy **relative to alternatives**.

- Notwithstanding the above, Spatial Option 3 is not satisfactorily defined in the Council's appraisal of options. Judgements are made about its adverse impacts without a consideration of the sites and settlements which may deliver growth through the implementation of this spatial option. A determination of whether and to what extent the claimed impacts will arise can only be made through an understanding of the sites which will deliver the growth. The basis on which Spatial Option 3 is rejected is flawed and un-evidenced therefore.
- Further, as related to the above point, the Council has overstated the harm which would arise from a spatial option of greater distribution of residential development across the Borough and amongst the Outlying Settlements (known as Spatial Option 3 as defined and tested by the Council) when assessing this option against others.
- The Council has failed to recognise the harm to the Outlying Settlements which will arise from capping their growth at incremental levels and has fundamentally overstated the benefits arising from permitting them to grow to such a constrained extent.
- By reference to specific sites, a level of growth within the Outlying Settlements above that proposed through the selected Spatial Option 2 can be provided without giving rise to additional adverse impacts. Further, substantial benefits will flow from this.

8.6 Whilst this Paper has not sought to define the maximum allocation for the settlements of the Borough for the purposes of the Local Plan, it concludes, through an evidenced approach, that in the context of an increased housing requirement, a strategy of supporting **significantly above** incremental growth in the Outlying Settlements would represent a justified and appropriate, sustainable spatial strategy. It demonstrates that, as a minimum, the specific additional sites identified by Peel through this Paper should be allocated in the Outlying Settlements on top of those proposed through the PSLP. Other sites on top of this may also be allocated.

8.7 In this regard, Spatial Option 2 as defined, and thereafter selected as the basis for the PSLP, cannot be considered to be a justified and appropriate strategy having regard to reasonable alternatives drawing on robust evidence. That the PSLP's spatial strategy reflects tested Spatial Option 2 means the PSLP is not justified and is unsound as a result.

8.8 This Paper has demonstrated that a number of Outlying Settlements have the capacity to accommodate a quantum of development beyond incremental levels in a sustainable manner, by reference to specific site opportunities and a consideration of the characteristics and infrastructure capacity of those settlements.

8.9 In this context, and that of there being a critical need to meet a significant otherwise unmet housing requirement, as well as the need for safeguarded land (including within the Outlying Settlements) to meet development needs beyond the plan period, sites proposed by Peel in the settlements of Lymm, Culcheth, Croft and Hollins Green represent sustainable development opportunities and provide the opportunity to realise significant benefits for the respective settlements. These sites should be allocated for a mix of development during the plan period and safeguarded land to meet development needs beyond the plan period as part of a series of amendments needed to the PSLP to enable it to proceed on a sound basis hereafter. The proposed, and necessary, additional allocations are summarised as follows:

- **Land north east of Culcheth** – allocation for the development of 300 dwellings during the plan period with a separate allocation of safeguarded land with a capacity to deliver 300 dwellings beyond the plan period
- **Land off Rushgreen Road (land east of Tanyard Farm), Lymm** – allocation for the development of 112 dwellings during the plan period with a separate allocation of land to the south as either safeguarded land with capacity to deliver 112 dwellings beyond the plan period or as a Green Wedge or equivalent designation to retain the site's open character
- **Land at Manchester Road, Hollins Green** – allocation for development of 292 dwellings during the plan period **or** allocation for the development of 93 dwellings during the plan period and an allocation of safeguarded land with a capacity to deliver 199 dwellings beyond the plan period
- **Land at Lady Lane, Croft** – allocation for development of 195 dwellings during the plan period **or** allocation for the development of 83 dwellings during the plan period and an allocation of safeguarded land with a capacity to deliver 112 dwellings beyond the plan period

**Appendix 1: Land north east of Culcheth:
indicative masterplan**

Area measures:

Total site area	97.12 ha
Developable area	10.14 ha
Spine road	2.67 ha
Open Space	29.42 ha
Culcheth Country Park	38.48 ha
Allotments	0.82 ha
Formal sport	1.40 ha
Allotments/sports car park	0.27 ha
Proposed safeguarded land	13.92 ha

This site could deliver up to 300 dwellings @ 30 dwellings per hectare



LANDSCAPE ARCHITECTURE
ENVIRONMENTAL PLANNING
MASTERPLANNING
URBAN DESIGN



Canada House, 3 Chepstow Street, Manchester M1 5FW
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Key

- Proposed site boundary
- Proposed Green Belt boundary
- Existing vegetation
- Existing watercourses and waterbodies
- Proposed tree and woodland planting
- Proposed development cell
- Proposed Culcheth Country Park (retained within Green Belt)
- Proposed open space
- Potential school extension
- Sites with planning applications / recently developed
- Safeguarded land for future development
- Proposed new sports pitches
- Retained PROWs
- Proposed pedestrian links
- Proposed primary road
- Proposed secondary road
- Proposed car parks
- Proposed vehicular access from Warrington Road (priority junction or roundabout)
- Proposed access to Culcheth High School
- Potential emergency link
- Proposed allotments
- Proposed SuDS
- Proposed NEAP/LEAP

NB: Masterplan subject to change following detailed survey work.



Warrington Local Plan Sites

**North East Culcheth
Plan Period Illustrative Masterplan**

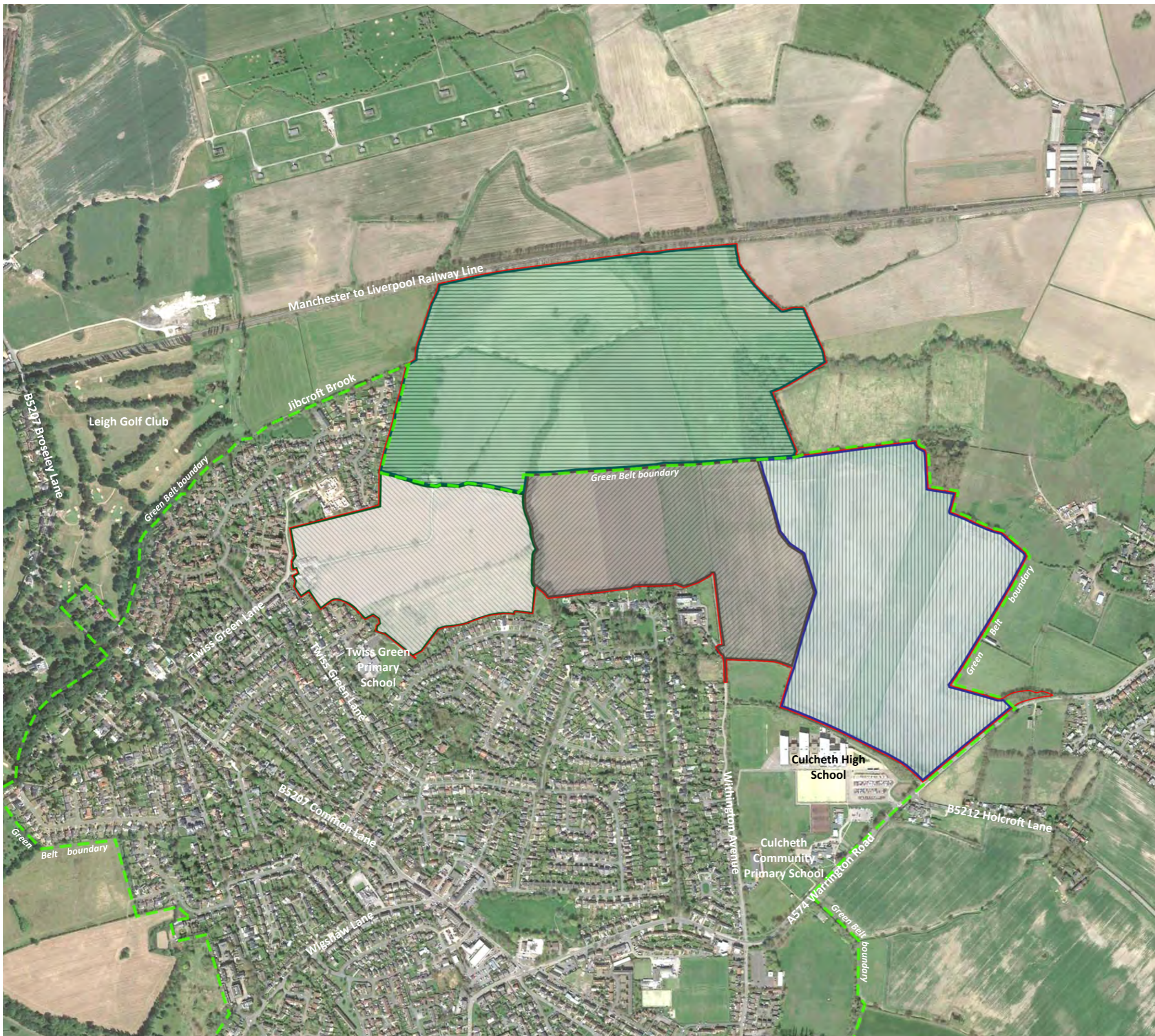
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Drawn by: SR
Rev by: SR
QM Status: Checked
Scale: NTS

Date: 07.06.19
Checker: SR
Rev checker: SR
Product Status: Issue

Appendix 2: Proposed development north east of Culcheth: 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 3: Land off Rushgreen Road (east of Tanyard Farm) – indicative masterplan

KEY:

-  Site Boundary
-  Proposed safeguarded land / Green wedge
-  Existing woodland/trees
-  Proposed woodland/trees
-  Proposed open space
-  Proposed development cells
-  Proposed access
-  Potential Emergency Access
-  Potential pedestrian connections to surrounding footpaths and open space
-  Proposed main road
-  Proposed secondary road
-  Proposed private drive
-  Existing Public Right of Way
-  Proposed footpath network

NB: Masterplan subject to change following detailed survey work.



**Land off Rushgreen Road
Lymm, Warrington**

Plan period illustrative masterplan

Drwg No: 630DD-15E
Drawn by: AH
Rev by: EM
QM Status: Checked
Scale: NTS @ A3

Date: 19.09.17
Checker: CAW
Rev checker: SR
Product Status: Issue







Area Measures:

Total site area:	14.99 ha
Proposed safeguarded land:	7.87 ha
Other (existing housing):	0.54 ha
Developable area:	3.72 ha
Spine road:	0.67 ha
Green infrastructure:	2.19 ha

This site could deliver up to 112 units @ 30 dwellings per hectare.

**Appendix 4: Proposed development off
Rushgreen Road (east of Tanyard
Farm): 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














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Rev by: SR
QM Status: Checked
Scale: NTS @ A3

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



Appendix 5: Land at Lady Lane, Croft: indicative masterplan

KEY:

-  Site boundary
-  Existing footpath
-  Proposed footpath
-  Existing buildings
-  Existing vegetation within site
-  Proposed SUDS feature
-  Proposed tree planting
-  Green infrastructure
-  Proposed development area
-  Proposed vehicular access points
-  Potential vehicular access points
-  Proposed primary road
-  Proposed secondary road
-  Proposed LEAP

NB: Masterplan subject to change following detailed survey work



Land off Lady Lane, Croft

Site masterplan

Drwg No: 630DA-11B
 Drawn by: AH
 Rev by: AH
 QM Status: Checked
 Scale: 1: 5000 @ A3

Date: 12.09.17
 Checker: SR
 Rev checker: SR
 Product Status: Issue



Area Measures:

Total site area:	10.35 ha
Infrastructure roads:	0.7 ha
Green infrastructure:	3.15 ha
Total developable area :	6.50 ha

This site could deliver up to 195 units (@30 d/ha).



**Appendix 6: Land at Manchester Road, Hollins
Green: indicative masterplan**



KEY:

-  Site boundary
-  Existing buildings
-  Existing vegetation
-  Proposed woodland planting
-  Proposed avenue trees
-  Green infrastructure
-  Proposed development area
-  Potential focal square
-  Proposed primary road
-  Proposed secondary roads
-  Proposed private drives
-  Proposed vehicular access
-  Proposed footpaths

NB: Masterplan subject to change following detailed survey work.



**Land off Manchester Road,
 Hollins Green**

Site masterplan

Drwg No: 630DF-09B
 Drawn by: AH
 Rev by: CAW
 QM Status: Checked
 Scale: 1: 5,000 @ A3

Date: 22.09.17
 Checker: CAW
 Rev checker: SR
 Product Status: Issue

Area Measures:
 Total site area: 12.24 ha
 Total developable area : 6.63 ha
 Spine road area: 0.78 ha
 Green infrastructure: 4.83 ha

This site could deliver up to 199 units
 (@30 d/ha).

Appendix 7: Supporting evidence on assessing current needs and sustainability of the outlying settlements

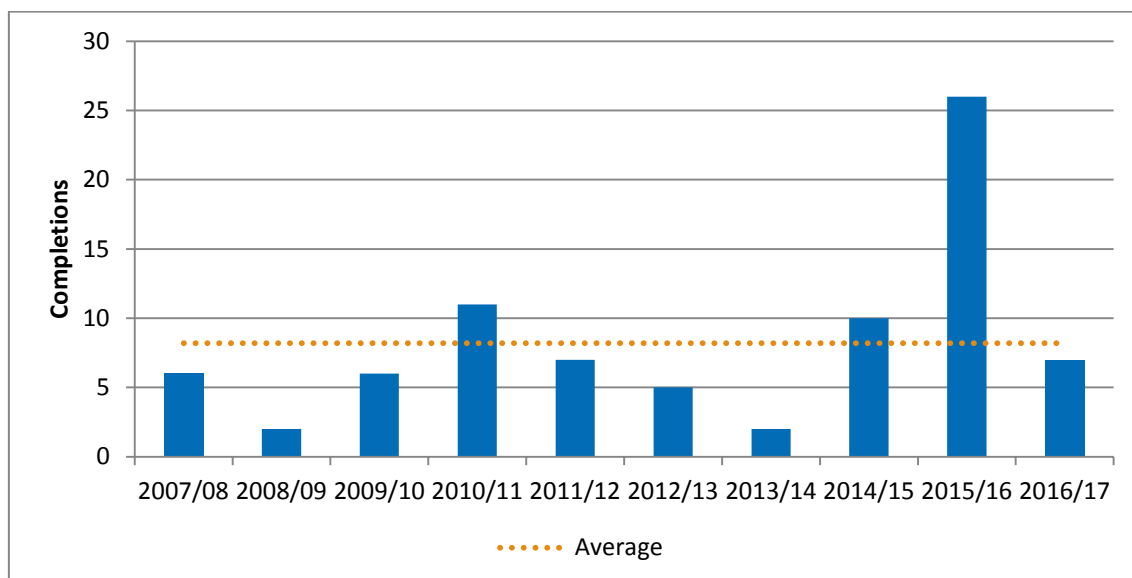
Culcheth

Table 1: Average Price Paid in Culcheth

	2009	2013	2018	Change	
				2009 18	2013 18
Warrington borough	£167,327	£180,633	£214,962	+28%	+19%
Culcheth	£212,033	£207,494	£289,133	+36%	+39%
Culcheth rel. to borough	+27%	+15%	+35%	–	–

Source: Turley analysis of Land Registry transactions

Figure 1: Council Monitoring of Housing Completions in Culcheth (2007 – 2017)



Source: Warrington Borough Council, 2018

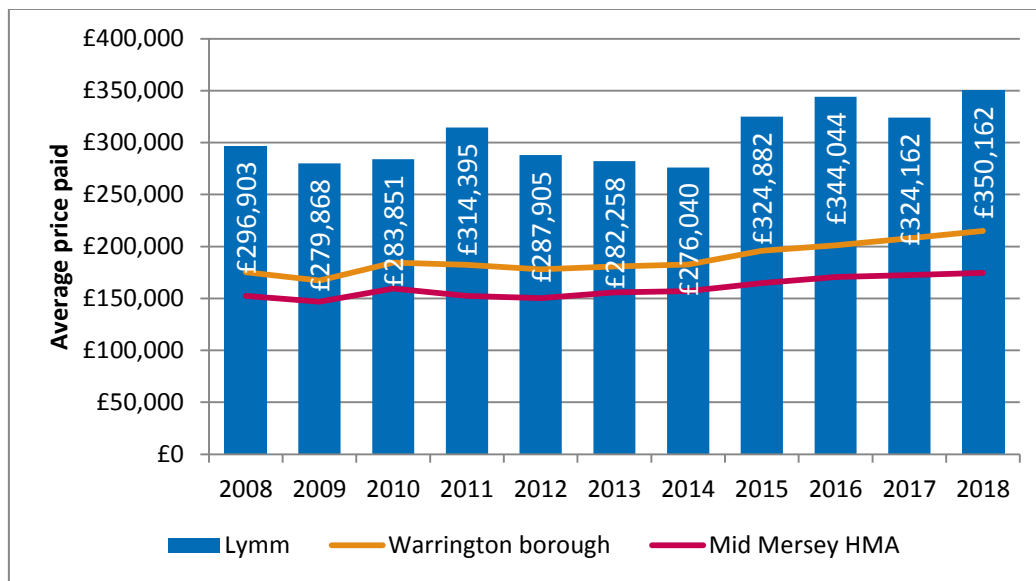
Lymm

Table 2: Current Primary School Provision in Lymm (2018/19)

School	Capacity*	Number of Pupils on roll*	Spare capacity
Cherry Tree Primary School	210 (1FE)	218	-8
Oughtrington Community Primary School	420 (2FE)	416	4
Ravenbank Community Primary School	420 (2FE)	416	4
Statham Community Primary School	210 (1FE)	203	7
Total	1,260 (6FE)	1,253	7

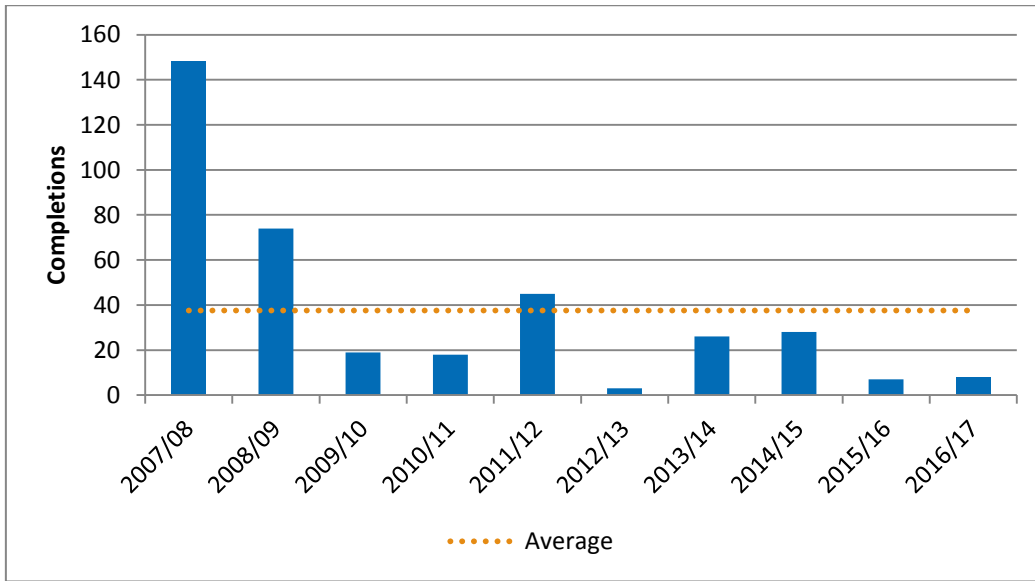
*Jan 2018 School Census (provided by Warrington Borough Council)

Figure 2: Average Price Paid in Lymm



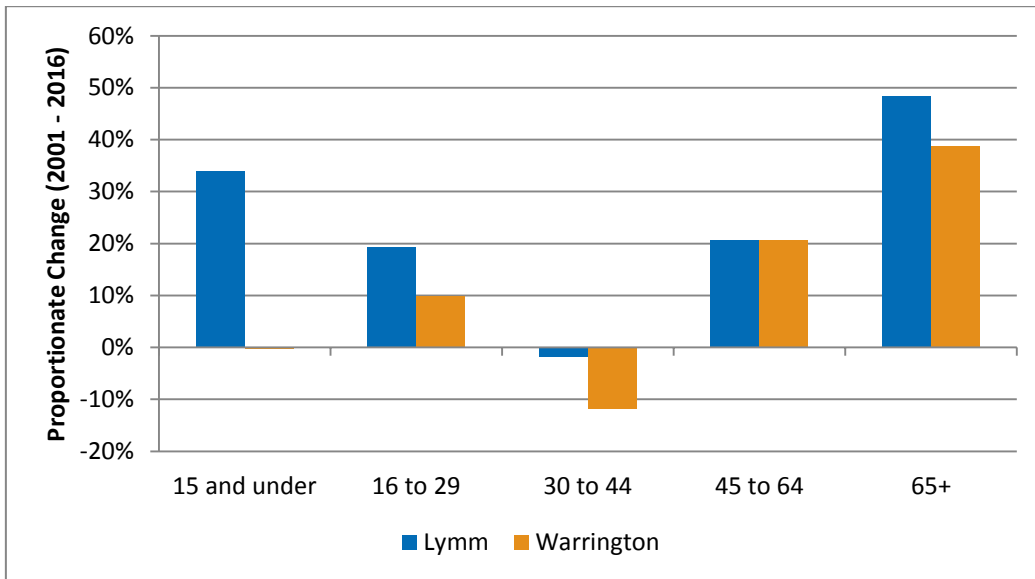
Source: Land Registry, 2018

Figure 3: Council Monitoring of Housing Completions in Lymm (2007 – 2017)



Source: Warrington Borough Council, 2018

Figure 4: Proportionate Change in Population by Age Group (2001 – 2016)



Source: ONS; Edge Analytics

Croft

Table 3: Current Profile of Primary Schools (2018/19)

School	Capacity*	Number of Pupils on roll*	Spare capacity
Croft Primary School	188 (0.9FE)	209	-21
St Lewis Catholic Primary School	210 (1FE)	195	15
Total	398 (1.9FE)	402	-6

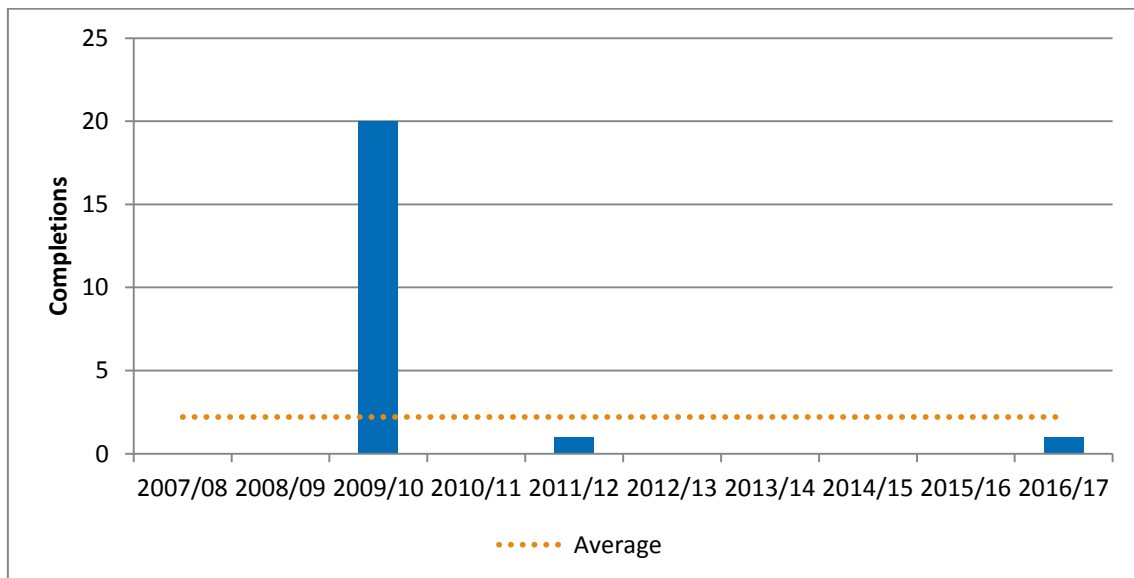
*National School Census (Jan 2017)

Table 4: Average Price Paid in Croft

	2013	2018	Change
Warrington borough	£180,633	£214,962	19%
Croft	£215,174	£303,028	41%
Croft rel. to borough	19%	41%	

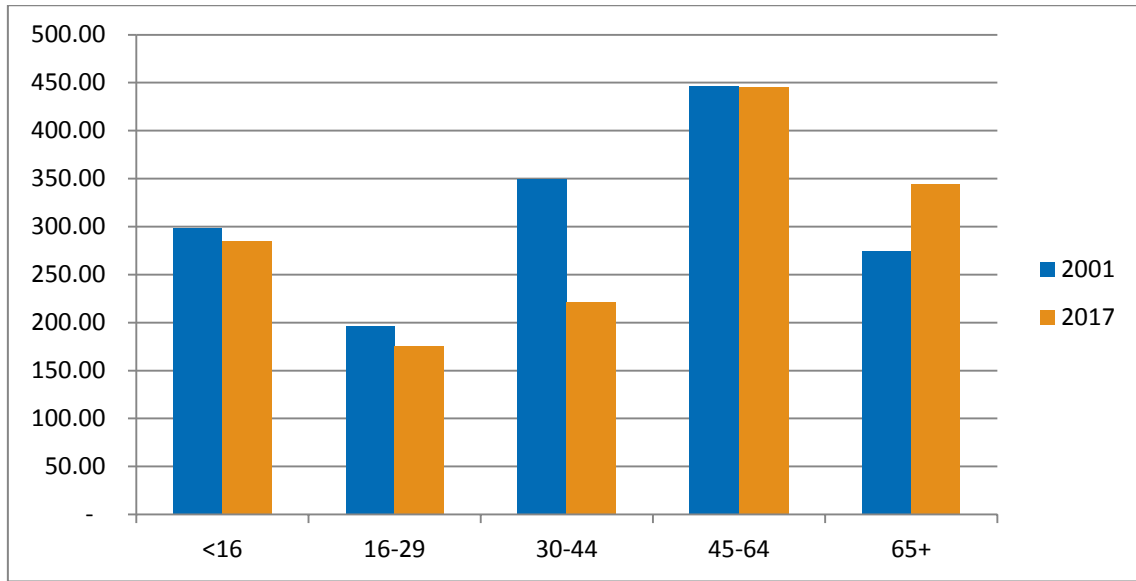
Source: Land Registry, 2018

Figure 5: Council Monitoring of Housing Completions in Croft (2007 – 17)



Source: Warrington Borough Council, 2018

Figure 6: Population change in Croft (2001 – 2017)



Source: ONS; Edge Analytics

Hollins Green

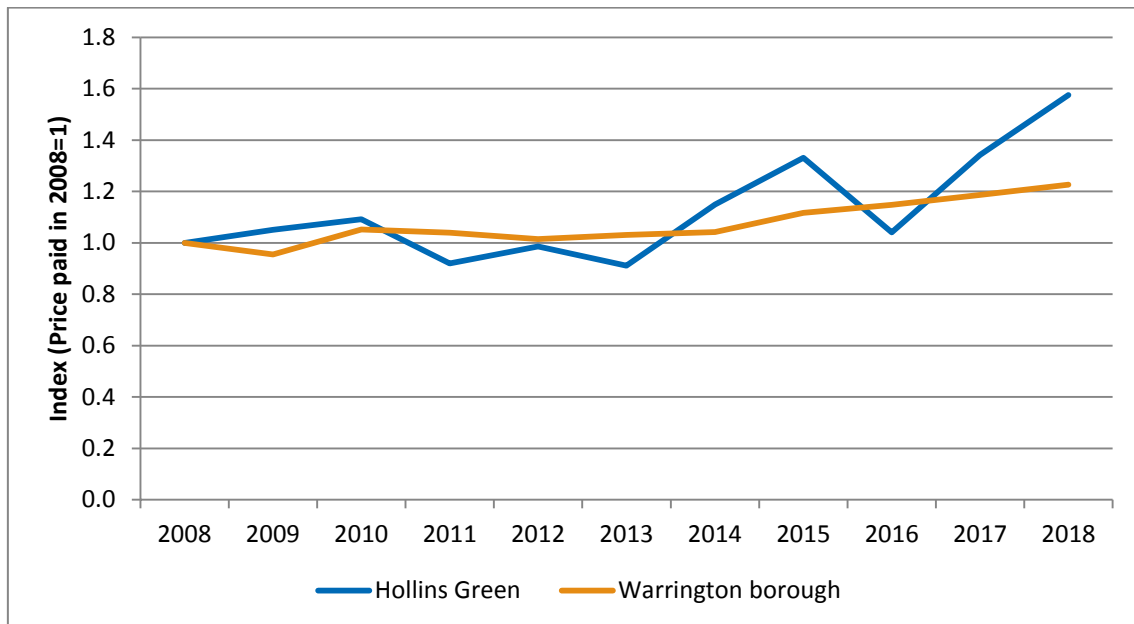
Table 5: Current Profile of Primary Schools (2018/19)

School	Capacity*	Number of Pupils on roll*	Spare capacity
Hollins Green St Helen's CofE	140 (0.6FE)	134	6
Total	140 (0.6FE)	134	6

*National School Census (Jan 2017)

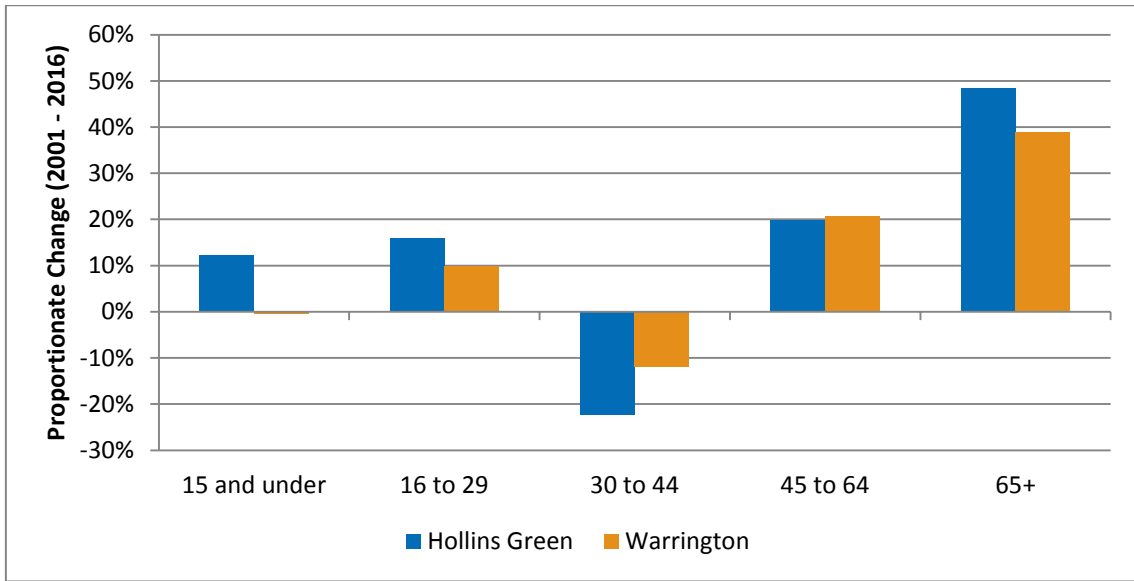
**Warrington Outlying Settlements Area Profiles (June 2017)

Figure 7: Indexed Change in House Prices in Hollins Green and Warrington (2008 – 2018)



Source: Land Registry

Figure 8: Population Change in Hollins Green (2001 – 2016)



Source: ONS; Edge Analytics

Appendix 8: Secondary school capacity and the Outlying Settlements

Introduction and Scope of this Technical Note

Secondary school capacity is cited by Warrington Borough Council (WBC) as one reason for limiting housing growth in the outlying settlements. The ‘Development Options and Site Assessment Technical Report’ (March 2019), which summarises more detailed evidence undertaken by WBC following the 2018 Preferred Development Option (PDO) Consultation, outlines that Spatial Option 3 was not chosen as a settlement extension in one or more of the outlying settlements (noting it assumes an extension of 1,400 homes) *“would not be of sufficient size to deliver a new secondary school and would therefore place additional pressure on existing secondary schools”*⁴⁹. This is similar to the position taken by WBC in June 2018 where it was stated that Option 3 *“may result in secondary school capacity issues”*⁵⁰.

It is noted in the Council’s appraisal that this point responds to a concern that the implied reduction of development within the main urban area, under Spatial Option 3 as proposed by the Council, would compromise the ability to deliver an additional secondary school in the Warrington Urban Area. For the reasons set out in Paper 2 and re-referenced in Paper 3, the evidenced higher need for housing means that a reasonable variant growth option would not reduce the provision in the urban area, but require a higher level of provision in the Outlying Settlements. Under this scenario the proposed secondary school in the Warrington Urban Area would still be supported by the quantum of development; this therefore negates any reason for concern.

The starting point position advanced by the Council (i.e. to present school capacity as a direct limiting factor in the long term planning for meeting housing needs) is considered to conflict with national policy. National policy outlines that education infrastructure should instead proactively support housing growth. The NPPF outlines that the role of plan-making is to *“positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change”* (para 11). The Department for Education (DfE), through the latest guidance on developer contributions, seeks to *“provide advice for local authorities on how to plan for new school places that are required due to housing growth”*, rather than limit housing growth based on infrastructure capacity. The emphasis is that education infrastructure should proactively support the *“ambitious housing agenda to increase housing delivery”*⁵¹.

This forms an important challenge to the Council’s perception of school capacity issues and a challenge to the justification of dismissing Spatial Option 3. Even where the position taken by the Council is given consideration, however, the purpose of this paper is to show, through a more thorough assessment of existing and potential capacity in Culcheth and Lymm high schools, that the evidence does not support the Council’s position that secondary school capacity can be used as a reason for limiting housing growth in the Warrington Outlying Settlements. A more nuanced understanding of the drivers for demand is required, rather than

⁴⁹ Warrington Borough Council (2019) Development Options and Site Assessment Technical Report – Appendix 2, page 2

⁵⁰ Warrington Borough Council (2017) Preferred Development Option – Page 20

⁵¹ Department for Education (2019) Securing developer contributions for education

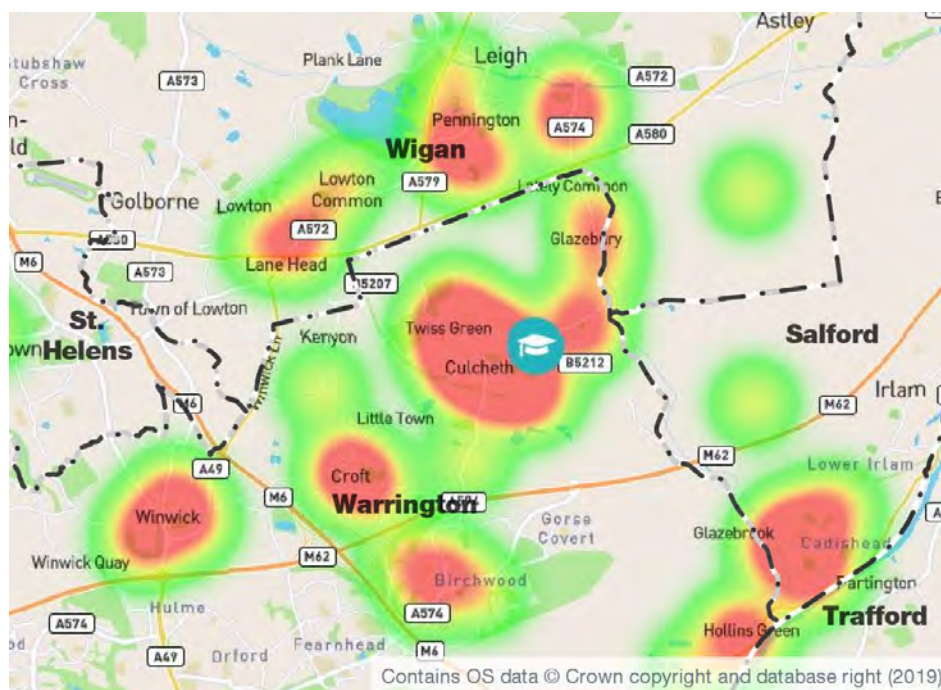
simply considering the current and short term future capacity⁵² within the schools. In the case of both High Schools, a more strategic approach should be taken which considers the influence of new secondary schools in other local authorities and appropriate catchment geographies.

A more nuanced understanding of future secondary school capacity at Culcheth High School

WBC is correct in its assessment that Culcheth High School is currently close to capacity. In this academic year (2018-2019) there are 1,240 places available across years 7 to 11 (ages 11 to 16), of which 92% are taken by 1,142 pupils on roll⁵³. Culcheth High School primarily supports secondary school age pupils living in Culcheth, Glazebury & Croft ward (53.7% of pupils reside in these locations combined)⁵⁴.

Contrary to WBC's approach, a more nuanced understanding of demand considers other locations in which pupils live beyond the local area. In the case of Culcheth High School, a high proportion of pupils (30.6% or 350 pupils) live outside of the borough of Warrington; of which, 62.7% live in Wigan Borough (concentrated around Leigh) and 32.5% live in Salford Borough (concentrated around Cadishead)⁵⁵. This trend is illustrated in Figure 8.1.

Figure 8.1: Origin of pupils attending Culcheth High School

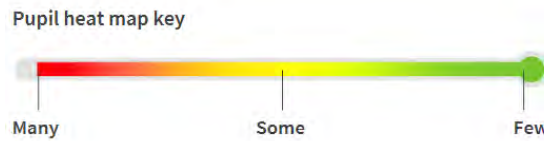


⁵² Pupil forecasts provided by Warrington Borough Council only cover the next 5 year period. This is not adequate for long term school planning over the Local Plan period.

⁵³ Department for Education (2019) January 2019 School Census

⁵⁴ Additional data provided by Warrington Borough Council (27/06/2018). See Appendix 1.

⁵⁵ Data provided by Warrington Borough Council (06/06/2018)



Source: SchoolGuide.co.uk, 2017

Analysing the geographical distribution of pupils at Culcheth High School shows that the drivers of secondary school demand can be complex. The assessment of a school's capacity to accommodate future housing growth therefore requires an equally nuanced approach, rather than simply assessing the number of spare places available.

In order to consider the potential future capacity of Culcheth High School to accommodate additional demand from within Culcheth and other Outlying Settlements, two points are important to recognise:

- Point 1: The number on roll in the future could be affected by changes to school planning elsewhere and therefore additional space capacity could be created; and
- Point 2: The development proposals advanced by Peel through the representations are able to accommodate an expansion of Culcheth High School where the Council evidences that additional space is required. This would address the concern specifically raised by the Council as it would generate additional school capacity for children living in Culcheth and other outlying settlements within the catchment area.

Critique of limiting housing growth based on the capacity of Culcheth High School

Point 1: The number on roll at Culcheth High School may be affected by changes to school planning elsewhere in the future

As outlined in Figure 1.1, a proportion of pupils at Culcheth High School live in Wigan, Salford and Trafford. Over the Local Plan period there are likely to be changes to secondary school infrastructure within these areas and this will have an impact on the number of spare places available at Culcheth High School following a redistribution of pupils.

For example, there is likely to be new secondary school provision in Cadishead (Salford). The Draft Greater Manchester Spatial Framework allocation WG2 for 1,600 homes on the edge of Cadishead requires land to be earmarked for school provision. There is also an allocation for 11,500 homes New Carrington which will deliver a school (allocation WG1). According to the WBC, 32.5% of pupils residing outside of the borough live in Salford (concentrated around Cadishead). If these pupils attend the new school instead, this would free up capacity of circa 115 places at Culcheth High School. In itself by way of example this additional capacity would **generate space for up to an additional 639 homes**⁵⁶

Looking only at Salford shows that it is likely that over the Local Plan period of 20 years that the number of pupils attending Culcheth High School who live outside the borough may have

⁵⁶ Calculated based on the pupil multiplier of 0.18 published by Warrington Borough Council. The number of pupils attending from Salford (115) is divided by pupil multiplier (0.18) to give the number of homes which could be supported (639 dwellings)

alternative secondary school options closer by a result of school infrastructure changes elsewhere. It is not likely that this source of demand (from outside of the borough) will increase as WBC give admission preference based on distance to the school⁵⁷.

Point 2: The potential to expand Culcheth High School

The proposed development in Culcheth advanced by Peel through these representations is shown in the Development Prospectus; this proposal will provide the option to facilitate the extension of Culcheth High School. This option would be explored with the Council where it evidences that additional capacity is required to support additional demand generated from proposed development.

The exact scale of the capacity which could be created through the expansion would need to be determined through future detailed designs and would need to be proportionate to the evidenced scale of any deficit. However, it is considered that it would offer significant flexibility in ensuring that any perception that the existing capacity of the High School could serve to limit the capacity for the reasonable future growth of Culcheth and or other proximate Outlying Settlements would be lessened.

Critique of limiting housing growth based on the capacity of Lymm High School

Lymm High School is the other main secondary school serves the Outlying Settlements of Croft, Hollins Green and Lymm. By way of context, this is a well performing school with a 'good' Ofsted rating and therefore places are in high demand (Feb 2018 Inspection).

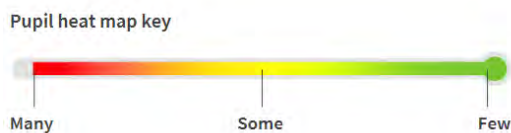
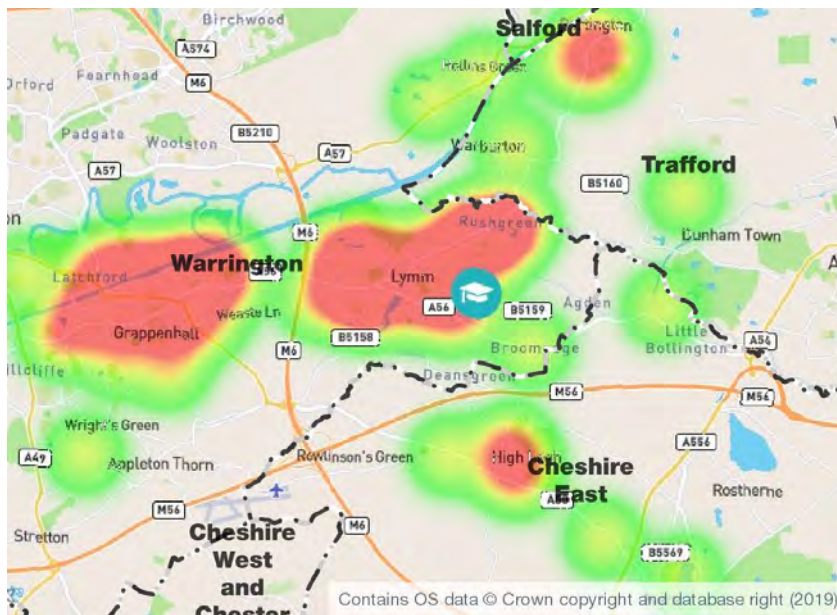
According to the latest figures, there are 73 spare places across the whole school (ages 11 to 18). For this academic year, year 7 places were oversubscribed⁵⁸. The demographic modelling suggests that the spare capacity at the secondary school will decrease slightly; over the next 20 years (2017-2037) the secondary school age population in Lymm (11-18 years old) is forecast to grow by 26 children.

However, as with Culcheth High School, it is important to note that secondary school pupils attending Lymm High School also travel from other settlements in Warrington and Trafford. This is shown in the figure below.

⁵⁷ Warrington Borough Council (2019) Secondary School Information for Parents (2019-2020)

⁵⁸ Warrington Borough Council (2019) Secondary Education Information for Parents Booklet 2019-2020

Figure 4: Origin of Lymm High School Pupils



Source: SchoolsGuide.co.uk (based on 2017 School Census)

Specific cross catchment data was requested from WBC education team and found that:

- 62.0% of pupils (922 children) live in wards Lymm North & Thelwall and Lymm South, which is the immediate area surrounding the school;
- 14.5% of pupils (216 children) live outside of Warrington borough;
- 13.5% of pupils (200 children) live in Grappenhall and Appleton wards which is just south of the Warrington urban area; and
- 7.7% of pupils (115 children) live within central, north, east and west Warrington.

As with the analysis of Culcheth High School the Council should consider the extent to which changes in high school provision in adjacent authorities from which pupils travel could impact on numbers over the plan period. However, in the case of Lymm it is of note that the Council's planned provision for new high schools in the Urban Area itself will be expected to have an impact in terms of increasing potential capacity to meet the needs of pupils within the settlement itself.

A new secondary school, in addition to four primary schools, is proposed in the Garden City Suburb in south Warrington as part of the PDO for Warrington Borough. This will form an extension to the main urban area and will deliver approximately 6,000 new homes. Currently

200 Lymm High School pupils live in south Warrington (in Appleton and Grappenhall wards)⁵⁹. It can reasonably be expected that these pupils will attend the new secondary school creating additional spare capacity at Lymm High School.

Conclusion: Planning strategically for Local Plan housing growth

A more proactive approach to housing and infrastructure planning is required in Warrington to support sustainable communities. The Local Plan is an opportunity to think strategically about the type of settlements that WBC wants to create in the long term. As outlined earlier, the NPPF outlines that the role of plan-making is to *“positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change”* (para 11) and consider the spatial implications of changing economic and demographic trends.

This technical note not only highlights that the Council’s approach to limiting housing growth based on secondary school capacity conflicts with national policy, but the note also considers in more detail the extent to which such a concern is merited on the basis of understanding the potential future capacity within Culcheth and Lymm High Schools.

While it is correct that both Culcheth and Lymm High Schools are currently at or close to capacity, a more nuanced understanding of the drivers of demand is required as the same methods of assessing school capacity for a planning application (i.e. simple assessment of surplus capacity) is not appropriate for planning development over a 20 year period.

Pupils living outside of the borough should not be considered when determining a ‘cap’ on growth based on infrastructure capacity. A review of emerging Plans in these other authorities indicates that the proportion of pupils could reduce in the future following wider changes to school infrastructure, with the same also true where it is recognised that additional secondary school provision is proposed in the Warrington Urban Area. This presents the real prospect that additional capacity will be available at both high schools to accommodate additional pupils arising from within Culcheth and Lymm as well as those Outlying Settlements from which pupils are currently drawn and are in catchment.

Furthermore, in the case of Culcheth High School, the development proposed by Peel provides the opportunity to support the extension of the existing school facility. Such an expansion would be determined where need is evidenced by the Council and agreed but evidently presents an opportunity to assuage the direct challenge identified by the Council with regards specifically to the opportunity for additional capacity to be available to support further growth in the Outlying Settlements to the north of the borough.

Collectively the analysis in this note highlights, in accordance with the NPPF, that there is an opportunity in Warrington to plan positively for secondary school education provision to accommodate additional housing needs through the further modest expansion of the Outlying Settlements. The Council’s suggestion, in its appraisal of Spatial Option 3, that a settlement extension of one or more of the Outlying Settlements would place additional pressure on existing secondary schools is not justified where it is recognised that mitigation measures can be identified to offset a reasonable level of growth and association additional need.

⁵⁹ Additional data provided by Warrington Borough Council on 27/07/2018

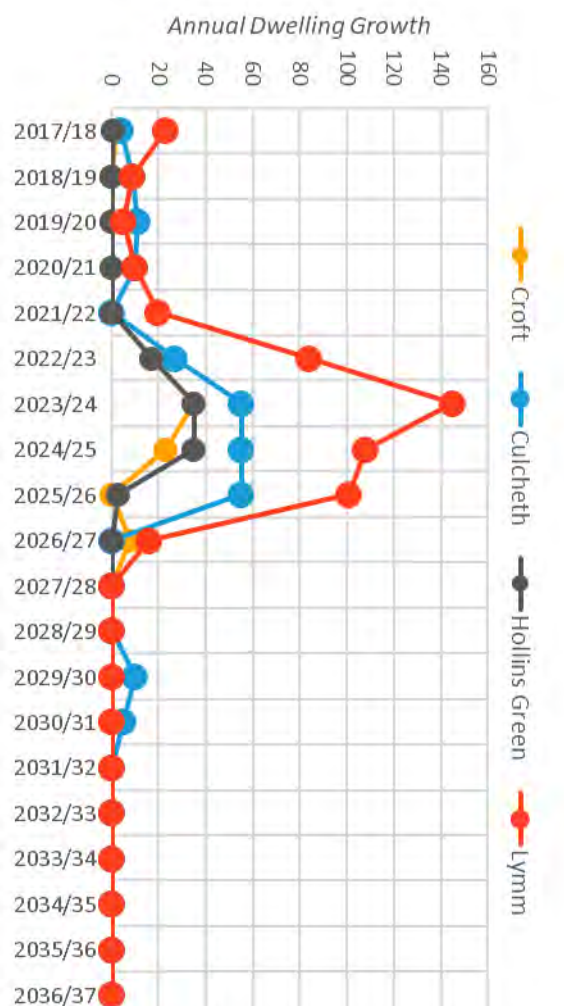
Appendix 9: Edge Analytics Demographic Modelling

Data Inputs and Assumptions

Edge Analytics has configured its POPGROUP⁶⁰ cohort component model to consider the potential population growth impact of dwelling growth in four settlement areas; Croft, Culcheth, Hollins Green and Lymm.

Population growth is driven by the annual change in dwellings over the forecast period as, informed by the housing growth proposed in the Proposed Submission Local Plan (PSLP). Higher net in-migration is estimated if there is insufficient resident population to meet the dwelling growth target.

Figure 1: Annual dwelling growth for settlement areas estimated under the PSLP trajectory



The relationship between dwellings and population has been estimated through assumptions derived from the 2001 and 2011 Census and 2014-based household projection model from the Ministry of Housing, Communities and Local Government (MHCLG).

Population and Components of Change

- **Population:** Historical population statistics for the four settlement areas are provided by the Office for National Statistics (ONS) mid-year population estimates (MYE) (2001–2016) for Census Output Areas (OAs).
- **Births & Deaths:** Historical counts of births and deaths are provided by the ONS MYEs (2001/02–2015/16). Future births and deaths are calculated using a combination of UA level age-specific fertility rate (ASFR) and mortality rate (ASMR) schedule and long-

⁶⁰ POPGROUP is a cohort component model which uses assumptions on births, deaths and migration to forecast population

term changes in rates from the 2016-based SNPP, together with fertility/mortality differentials for each of the four settlements.

- **Migration:** Historical counts of migrants are estimated for the 2001/02–2015/16 period. A higher level of migration occurs if there is insufficient population to meet the forecast dwelling growth target. The profile of migrants is defined by an age-specific migration rate (ASMigR) schedule, using a weighted average of the last ten-years of migrant counts for each of the four settlements.

Households & Dwellings

- The relationship between the defined annual change in *dwellings* and *household* growth has been estimated using a vacancy rate derived from the 2011 Census for each of the four settlement areas; Croft (3.3%), Culcheth (3.6%), Hollins Green (2.6%) and Lymm (3.1%).
- Households are converted to population change using household representative rate and communal population (i.e. population-not-in-households) assumptions derived from the MHCLG 2014-based household projections for Warrington and small area statistics available from the Census.

Summary of Modelling Outputs

Table 1: Culcheth

Age cohort	2001	2017	2037
15 and under	1,471	1,253	1,252
16 to 29	752	943	826
30 to 44	1,653	1,029	1,199
45 to 64	1,813	2,103	1,656
65 and over	1,386	1,702	2,313
Total	7,075	7,031	7,247
16 – 64	4,218	4,076	3,682

Table 2: Croft

Age cohort	2001	2017	2037
15 and under	298	285	299
16 to 29	196	175	213
30 to 44	350	221	292
45 to 64	446	445	417
65 and over	275	344	409
Total	1,565	1,471	1,631
16 – 64	992	842	923

Table 3: Hollins Green

Age cohort	2001	2017	2037
15 and under	155	180	218
16 to 29	112	120	151
30 to 44	208	153	164
45 to 64	260	322	270
65 and over	167	248	397
Total	902	1,024	1,201
16 – 64	580	595	585

Table 4: Lymm

Age cohort	2001	2017	2037
15 and under	1,918	2,579	2,646
16 to 29	1,141	1,342	1,586
30 to 44	2,269	2,165	2,213
45 to 64	2,827	3,463	3,198
65 and over	1,639	2,462	3,384
Total	9,794	12,012	13,027
16 – 64	6,237	6,971	6,997

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