

Warrington Local Plan Consultation

Proposed Submission Version March 2019

Representations on behalf of Redrow Homes Limited

17 June 2019

Relevant Site Submissions:

Land west of Culcheth (Call for Sites Reference R18/P2/020)

Land south of Glazebrook Train Station (Call for Sites Reference R18/P2/021)

Land at Warrington Road, east of Culcheth

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Executive Summary

Introduction

These representations are submitted on behalf of Redrow Homes Limited in relation to the Warrington Proposed Submission Version Local Plan 2017-2037 (“WLP”) and supporting evidence base documents published by Warrington Council in March 2019.

Our representation considers the Housing Strategy that is being pursued within the WLP and covers the following matters:

- An assessment of the various sources of housing land supply set out under Policy DEV1 and whether the claimed quantum from these sources can be justified in consideration of past trends, infrastructure requirements and any other known constraints to delivery;
- A review of the delivery and density assumptions applied to the Main Development Areas within the WLP to test whether lead-in times and delivery rates are realistic in line with market and research evidence and any associated infrastructure requirements;
- Following the outcome of our assessment of the Housing Strategy, we will be able to determine whether additional sites are required to be identified in order to ensure that housing needs (both market and affordable) are met in full during the plan period.

The following sites are being promoted by Redrow, none of which are currently identified as draft Housing Allocations and further justification is provided to identify these sites as new Housing Allocations in the context of our analysis.

- **Land West of Culcheth** (Call for Sites ref R18/P2/020; Land at Kinknall Farm)
- **Land at Glazebrook** (Call for Sites ref R18/P2/021; Land west of Glazebrook Lane & Bank Street)
- **Land at Warrington Road, east of Culcheth**

Overview of the Housing Strategy

Housing Requirement

Redrow are of the view that the housing requirement of 18,900, or 945 dwellings per annum (just a 4% uplift from the standard methodology figure of 909 dpa) represents a suppressed housing requirement given the significant economic growth and job creation aspirations for Warrington, which is located in a key strategic position in the North West and so a significant uplift can easily be justified.

The need to identify Safeguarded Land

Paragraph 139 of the NPPF states that identifying areas of safeguarded land would assist with ensuring that the Green Belt boundaries proposed endure beyond the existing plan period. With this in mind, given the significant concerns Redrow has in respect of the existing claimed sources of housing land supply, Redrow are of the view that the identification of additional areas of safeguarded land is essential.

A trigger mechanism based upon actual rates of delivery could be incorporated in respect of future Local Plan reviews, which is an approach recommended at paragraph 33 of the NPPF. This would enable safeguarded land to come forward for development early should the housing trajectory currently anticipated in the WLP fail to deliver the required level of housing.

Concerns related to the Housing Land Supply Position (Policies DEV1, MD1, MD2 and MD3)

Redrow have some fundamental concerns with regards to how the overall housing requirement is proposed to be met. The primary areas of concern are:

- The anticipated yield of housing that is being claimed to be delivered within the existing urban areas (and particularly within Warrington town centre); and
- The assumptions that have been made in respect of the Main Development Areas (Policies MD1 to MD4), in particular whether the lead-in times and delivery rates are overly optimistic when considered against industry research and past trends in Warrington and the need to deliver major infrastructure items.

This is particularly important in Warrington because the Council acknowledge that despite the anticipated yield of housing coming forward from the urban area, exceptional circumstances still exist

to require the release of land from the Green Belt to meet future housing needs, which is set to deliver an additional 7,064 dwelling through the identification of new Housing Allocations.

Should these sources of housing land supply fail to deliver the anticipated yield, the Local Plan will not be able to provide the necessary flexibility to respond to change over time as more land would be required to be released from the Green Belt through a further Local Plan review, which is contrary the presumption in favour of sustainable development at paragraph 11 of the Framework.

This is therefore a matter that goes to the heart of the soundness of the Plan.

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

SHLAA sites within the existing urban area is a source of housing land supply that is particularly relied upon to deliver the majority (73%) of Warrington's housing requirement of 18,900 established under Policy DEV1. On this basis, it is imperative that the evidence underpinning this critical housing strategy decision is robust and realistic.

Redrow have undertaken a detailed assessment of the Town Centre and Waterfront Masterplan Areas and the evidence base that has been produced to justify a yield of 4,007 from the Town Centre and 2,542 from the Waterfront Area during the plan period 2017-2037. Redrow have fundamental concerns in respect of the following areas:

- The proposed annual completion rate of 377 dpa from the Town Centre and Waterfront areas is considered to be overly optimistic in consideration of past trends in Warrington;
- A number of the identified SHLAA sites lie within Flood Zones 2 and 3 and so from a sequential perspective, other sites are available and better placed to meet housing needs within Flood Zone 1, especially within the context of the Green Belt review that is being undertaken as part of the Local Plan preparation process;
- The complexity of land ownership and tenancies has not been taken into account when producing the Town Centre Masterplan and so a non delivery rate must be applied from this source of housing land supply;
- There are known viability issues related to developments in and around the Town Centre (with reference to recently approved schemes) and so the significant gap in infrastructure funding that exists to support this level of development (as confirmed in

the Infrastructure Delivery Plan) will not be met by private sector developers as is currently anticipated. This infrastructure will not therefore be delivered to a significant enough degree to support the delivery of this level of housing;

- The considerable length of time needed to deliver the Western Link Road has not been factored in to the Housing Trajectory for the Waterfront Area in particular and so a considerable lead-in time should be allowed for before the development can be considered capable of delivering a significant quantum of housing (10 years is suggested).

In Redrow's view, it is therefore a considerable risk for the Warrington Local Plan housing strategy to be relying on sites within Warrington Town Centre and the Waterfront Area to make such a significant contribution towards housing needs over the Plan Period. In light of the concerns outlined above, which go to the heart of the soundness of the Local Plan, a **discount of 2,626 dwellings should be applied to this particular source of housing land supply**. This would result in a total supply of 2,582 from sites within the Town Centre (reduced from 4,007) and 1,341 in the Waterfront Area (reduced from 2,542).

Supply from SHLAA sites outside of the Town Centre (Policy DEV1)

In order to account for the potential (and as the evidence suggests, highly likely) non-delivery of some SHLAA sites within the 'Wider Urban Area' Redrow are of the view that a non-delivery rate of 10% should apply. The quantum of housing from this source of housing land supply should therefore be reduced by 413 units, resulting in a total supply of 3,720 from this source

Warrington Garden Suburb (Policy MD2)

Redrow do not object to the principle of including the Garden Suburb as a Main Development Area within the WLP, but it is necessary to test whether the site is capable of delivering the level of housing set out within the Housing Trajectory provided at Appendix 2 of the Urban Capacity Assessment. Specifically, the following factors need to be considered:

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

Having taken in to account the infrastructure needed to deliver the Garden City Suburb, industry research relating to the timing and quantum of delivery from strategic sites and relevant local examples (in this case, Chapelford Urban Village and Buckshaw Village), it is anticipated that the maximum rate of delivery that will be achieved is 171 dwellings per annum. Applying this rate of delivery to the Housing Trajectory, as indicated at Table 11 of this representation, will result in a shortfall of 2,008 dwellings from this source of housing land supply during the plan period.

In order to account for the likely shortfall in housing delivery from this site (as evidenced) Redrow consider that the yield anticipated under Policy DEV1 should be reduced by 2,008 units, resulting in a total supply of 3,123 from this source.

South West Urban Extension (Policy MD3)

In order to account for an adequate lead-in time for delivery of the Western Link, Redrow are of the view that the 1,631 homes identified to be delivered at the South West Urban Extension during the plan period under Policy DEV1 should be reduced by 466 units, resulting in a total supply of 1,165 units from this source.

Summary of Redrow's stated position in respect of Warrington's Housing Land Supply shortfall

Source of Housing Land Supply	WLP Housing Trajectory 2017-37	Redrow discount	Redrow Housing Trajectory 2017-37
Warrington Town Centre	4,007	-1,425	2,582
Waterfront	2,542	-1,201	1,341
SHLAA Sites outside Town Centre	4,133	-413	3,720
Warrington Garden Suburb	5,131	-2,008	3,123
South West Urban Extension	1,631	-466	1,165
TOTAL	17,444	-5,513	11,931

Given this significant 5,513 dwelling shortfall, Policies DEV1, MD1, MD2 and MD3, which go to the heart of the housing strategy for Warrington cannot be considered to be sound in the context of paragraph 35 of the Framework as they are currently informed by an overly optimistic housing trajectory that is not justified in the light of all available evidence.

The baseline housing supply position set out within these policies must therefore be reduced by a total of 5,513 dwellings. It is imperative that this adjustment is made, because the Council's current stated position is that exceptional circumstances exist to release land from the Green Belt taking in to account the housing requirement of 18,900 and the baseline housing land supply position. A failure to deliver the baseline housing land supply position in this situation would result in housing needs not being met within the plan period, with no scope for flexibility because of the Green Belt constraints that exist.

Given the scale of the reduction deemed necessary by Redrow, it is clear that additional Green Belt sites of varying scales need to be identified as Housing Allocations in order that a deliverable supply remains available throughout the plan period and that market and affordable housing needs are met in full.

Suggested New Site Allocations

Redrow now provide further details of three suitable sites that are being promoted for residential development within the context of the above analysis, which would go some way towards making up the considerable shortfall that exists.

Land west of Culcheth

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

Justification to identify new Housing Allocations in Culcheth outside of the existing urban area

The sustainable credentials of Culcheth and its size and status in the outlying settlement hierarchy as confirmed by the evidence base justify a much higher housing distribution figure than the 200 dwellings currently proposed, particularly as the settlement is surrounded by Green Belt and the urban area provides limited capacity to contribute towards local housing needs, including affordable housing.

When compared to the other outlying settlements, it is apparent that there is a constrained level of housing growth proposed in Culcheth despite the capacity of the settlement to accommodate a much higher number. Table 13 of this representation assesses each of the settlements in respect of

their existing size and the percentage level of housing growth proposed in the WLP. Proportionally, Culcheth has the lowest level of housing growth proposed (just 8%) and the entire quota is intended to be delivered on a single site.

There is nothing within the evidence base to, firstly, justify the reduction of housing proposed in Culcheth when compared to the 2017 version and secondly, why such a low level of housing growth is appropriate for a settlement of this size that benefits from so many shops, services and access to key infrastructure.

Following the analysis undertaken in Section 8 of this representation, Redrow's view is that the housing distribution figure for Culcheth should be around 650-750 homes. This represents an appropriate and proportionate level of housing growth in what is the third largest settlement in Warrington in the settlement hierarchy.

Summary

The Development Options and Site Assessment Technical Report sets out the Council's rationale behind the selection of sites when considered against WLP objectives and alternative sites.

This site receives an extremely favourable assessment and at a fundamental level it concludes that the site accords with all Core Strategy objectives, i.e. W1 to strengthen existing neighbourhoods; W2 to facilitate the sensitive release of Green Belt; W4 to provide new infrastructure to support Warrington's growth and W6 to minimise the impact of development on the environment.

Redrow can confirm that the site is capable of delivering around 350-450 family homes (including affordable housing) in Culcheth, helping to ensure that the WLP housing strategy meets housing needs in full and achieves an appropriate distribution of growth around the District of the type, size and mix required to meet the identified needs.

Land at Warrington Road, east of Culcheth

As set out above, Redrow consider that a much higher level of housing growth in Culcheth (650-750 dwellings) is entirely justified given the size of the settlement (third largest in the borough), the wide range of shops and services available (the settlement has the infrastructure capacity to accommodate more housing) and the need for the outlying settlements to make up the considerable shortfall that exists in relation to existing sources of housing land supply.

Within this context, Redrow can confirm that this site is deliverable and has the capacity to accommodate c. 70 homes. The title plan of the land in question is provided at Appendix B of this representation and the following confirms that the site is deliverable in accordance with the definition provided at Annex 2 of the NPPF (2019).

This representation confirms that there is nothing to prevent the site from being delivered immediately and housing completions being achieved within 5 years subject to receipt of the necessary planning consents; it can therefore be considered available for housing delivery within the early phases of the WLP plan period.

The site is within a highly sustainable location and is only be considered to make a weak contribution towards the five purposes of including land within the Green Belt set out at paragraph 135 of the Framework and so can be considered appropriate for release for development. This is a therefore suitable location for new housing.

Redrow can confirm that the development of the site for housing is achievable as there are no known physical or technical constraints that would prevent it from coming forward.

Land south of Glazebrook Train Station

The site is available, suitable and achievable with a realistic prospect that housing will be delivered on the site within five years and represents a unique opportunity to deliver a truly sustainable development. The site is therefore 'deliverable' in accordance with the definition in Annex 2 of the NPPF (2019) and is being promoted by a major housebuilder with a proven track record of housing deliver in the northwest.

The development is centred around Glazebrook Train Station, which will provide residents with direct access to the wide range of employment, shopping, leisure and cultural opportunities available in Manchester, Liverpool, Warrington and Trafford Park. The development also offers the opportunity to significantly enhance the use of Glazebrook Train Station through the provision of a Park and Ride Facility, promoting sustainable methods of travel.

Redrow can confirm that the site is capable of delivering around 600-700 family homes (including affordable housing) in Glazebrook, helping to ensure that the WLP housing strategy meets housing needs in full and achieves an appropriate distribution of growth around the District of the type, size and mix required to meet the identified needs. Small scale commercial and community uses will

also be integrated into the scheme and the inter-relationship with neighbouring Cadishead and Irlam further enhances the sustainability credentials of the site.

The Masterplan and Development Report provided at Appendix C provides a significant level of detail with regards to future development proposals for the site.

1 Introduction

- 1.1 These representations are submitted on behalf of Redrow Homes Limited (“Redrow”) in relation to the Warrington Proposed Submission Version Local Plan 2017-2037 (“WLP”) and supporting evidence base documents published by Warrington Council (“the Council”) in March 2019.
- 1.2 Our analysis of the proposed Housing Strategy considers the following matters:
- An assessment of the various sources of housing land supply set out under Policy DEV1 and whether the claimed quantum from these sources can be justified in consideration of past trends, infrastructure requirements and any other known constraints to delivery;
 - A review of the delivery and density assumptions applied to the Main Development Areas within the WLP to test whether lead-in times and delivery rates are realistic in line with market and research evidence and any associated infrastructure requirements and conclude whether a shortfall is likely to exist;
 - Following the outcome of our assessment of the Housing Strategy, we will be able to determine whether additional sites are required to be identified in order to ensure that housing needs (both market and affordable) are met in full during the plan period.
- 1.3 Specific details of the following sites being promoted by Redrow, none of which are currently identified as draft Housing Allocations, will then be provided in the context of our analysis.
- **Land West of Culcheth** (Call for Sites ref R18/P2/020; Land at Kinknall Farm)
 - **Land at Glazebrook** (Call for Sites ref R18/P2/021; Land west of Glazebrook Lane & Bank Street)
 - **Land at Warrington Road, east of Culcheth**
- 1.4 It will then be confirmed that it is necessary to identify these sites as Housing Allocations within the WLP if housing needs are to be met in full. Further evidence is provided that each of these sites are available, suitable and achievable and therefore deliverable in line with the NPPF definition.

2 Overview of the Housing Strategy

2.1 Redrow have some fundamental concerns with regards to how the overall housing requirement is proposed to be met. The primary areas of concern are:

- The anticipated yield of housing that is being claimed to be delivered within the existing urban areas (and particularly within Warrington town centre); and
- The assumptions that have been made in respect of the Main Development Areas (Policies MD1 to MD4), in particular whether the lead-in times and delivery rates are overly optimistic when considered against industry research and past trends in Warrington and the need to deliver major infrastructure items.

2.2 SHLAA sites within the existing urban area is a source of housing land supply that is particularly relied upon to deliver the majority (73%) of Warrington's housing requirement of 18,900 established under Policy DEV1. On this basis, it is imperative that the evidence underpinning this critical housing strategy decision is robust and realistic.

2.3 This is particularly important in Warrington because the Council acknowledge that despite the anticipated yield of housing coming forward from the urban area, exceptional circumstances still exist to require the release of land from the Green Belt to meet future housing needs, which is set to deliver an additional 7,064 dwelling through the identification of new Housing Allocations.

2.4 Should these sources of housing land supply fail to deliver the anticipated yield, the Local Plan will not be able to provide the necessary flexibility to respond to change over time as more land would be required to be released from the Green Belt through a further Local Plan review, which is contrary the presumption in favour of sustainable development as set out at paragraph 11 of the Framework.

2.5 This is therefore a matter that goes to the heart of the soundness of the Plan.

The Housing Requirement

2.6 Policy DEV1 confirms that the housing requirement for the plan period 2017 to 2037 is a minimum 18,900 new homes, or 945 dwellings per annum. This represents just a 4% uplift to account for economic growth aspirations and affordable housing need. Even with the 10% flexibility factor

proposed at Table 1 of the WLP (increasing the requirement to 1,040 dpa), Redrow are of the view that this figure does not go anywhere near far enough if Warrington are to realise what are rightly ambitious targets around job creation and economic growth in particular. The 10% flexibility figure has only been introduced to account for potential shortfalls in the rate of delivery from identified sources of housing land supply and so is not a mechanism that should be used to capture economic growth aspirations. The baseline housing requirement is therefore what needs to be considered within this context.

- 2.7 Being located at the junction of the M6 and M62, on the West Coast mainline and surrounded by a critical mass of population within a commutable distance (Greater Manchester, Merseyside, Cheshire and Lancashire), Warrington has a distinct advantage when compared to other locations. This is borne out by the overwhelming success of the regional employment sites at Birchwood and Omega (which is continuing to expand, even in to neighbouring St Helens). These locations, added to the potential that Port Warrington brings with its multi-modal port facility and 74 ha of associated employment land and the significant quantum of employment land proposed at the Garden Suburb (74 ha) in particular, it is clear that Warrington is a location that would buck the national and regional trend when it comes to economic growth and the potential for job creation is therefore significant.
- 2.8 Redrow consider that the housing requirement has not been uplifted to a significant enough degree to align itself with the economic aspirations that Warrington is seeking to achieve, in the interests of achieving sustainable development.

Summary of the Housing Land Supply position in Warrington

- 2.9 Policy DEV 1 establishes the intended Housing Distribution that is anticipated to deliver the minimum requirement of 18,900 dwellings during the plan period 2017 to 2037). For ease of reference, Table 1 provides a summary:

Table 1: Summary of Housing Distribution by source (with reference to Policy DEV 1)

Housing Distribution Source	Dwellings 2017-2037
SHLAA Sites within main urban area and existing inset settlements	13,726
Garden Suburb (released from Green Belt)	4,201
South West Extension (released from Green Belt)	1,631
Allocated sites adjacent to outlying settlements (released from Green Belt)	1,085
Total	20,643

- 2.10 The Urban Capacity Assessment 2019, which forms part of the evidence base, then breaks the SHLAA Sites component down as follows:

Table 2: Breakdown of SHLAA and Masterplanning sites by source (with reference to Table 1 of the Urban Capacity Assessment 2019)

Source	Dwellings 2017-2037
SHLAA 2018 (existing supply)	9,226
Additional supply (Wider Urban Area) to 2037	210
Completions from 2017/18	359
TC Masterplanning Areas	6,549
Additional small sites allowance	304
SHLAA Sites in TC Masterplanning Areas	-2,919
Total	13,729

- 2.11 Looking at Table 2 above, the Town Centre Masterplanning Areas are anticipated to deliver 6,549 dwellings within the plan period (of which around 4,000 are in the Town Centre and 2,500 are at Warrington Waterfront) and the SHLAA Sites (outside of the Town centre) are therefore anticipated to deliver 6,307 dwellings. It is these specific sources of housing land supply that Redrow have the greatest reservations about and so our representation considers the evidence that underpins these figures in more detail (See Sections 3 and 4).
- 2.12 In addition, we will also analyse the robustness of the evidence that support the inclusion of the two Major Development Areas within the Green Belt, namely the Garden Suburb (4,201 dwellings) and the South West extension (1,631 dwellings) (See Sections 5 and 6).

Context for our analysis

2.13 The review of the Warrington Local Plan presents an opportunity to ensure that a robust strategy is adopted in respect of the future delivery of housing to meet identified needs. It has become apparent that a review of the Green Belt boundaries across Warrington is necessary as the existing urban area does not have available capacity to meet these needs. It would appear from the baseline position described above however that sufficient flexibility has not been allowed for to ensure that Green Belt boundaries can endure beyond the current plan period.

2.14 Redrow welcome and strongly support the steps that are being taken in respect of releasing land from the Green Belt, however paragraph 136 of the NPPF states:

“Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”

2.15 Paragraph 139, Parts (c) and (e) state that when defining Green Belt boundaries, plans should:

‘c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;

e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.’

2.16 In this context, it is essential that in order to meet the future housing requirements of Warrington in full, any Green Belt changes must take in to account housing needs extending beyond the current plan period. The WLP must therefore be founded upon a sound and credible evidence base in this regard in order that the opportunity to make informed decisions regarding the release of Green Belt is not missed.

2.17 Redrow support the principle of directing development to previously developed land. However, Paragraph 23 of the NPPF sets out how:

“Strategic policies should provide a clear strategic for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.”

2.18 Redrow have significant concerns that the strategy being proposed in the WLP over-estimates the number of dwellings that will come forward from land within the existing urban areas over the plan period, i.e. those sites forming the 'Urban Capacity' component of housing land supply as set out at Table 1 of the WLP. In doing so, it is the view of Redrow that the Council are failing to identify sufficient land outside of the existing urban areas, within the Green Belt.

2.19 As a result, the intention to deliver 18,900 net additional dwellings under Policy DEV1 will not be achieved and so there is a failure to plan effectively to meet future housing requirements, which is not consistent with national policy that requires plans to bring sufficient land forward to meet housing needs, and secure the long term permanence of Green Belt boundaries.

Safeguarded Land and a trigger mechanism for future Local Plan Reviews

2.20 As endorsed at paragraph 139 of the NPPF, identifying areas of safeguarded land would assist with ensuring that the Green Belt boundaries proposed endure beyond the existing plan period. Given the significant concerns that Redrow have in respect of the existing claimed sources of housing land supply, alongside the identification of additional Housing Allocations, a trigger mechanism based upon actual rates of delivery could be incorporated in respect of future Local Plan reviews, which is an approach recommended at paragraph 33 of the NPPF. This would enable safeguarded land to come forward for development early should the housing trajectory currently anticipated in the WLP fail to deliver the anticipated level of housing.

2.21 The remainder of this representations sets out the evidence that justifies these concerns.

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

- 3.1 Whilst the intention to deliver residential development within and around Warrington town centre is welcomed, the certainty of delivery must underpin the strategy for the delivery of housing to meet identified needs across Warrington as a whole. There are known infrastructure deficits in respect of the Town Centre and Masterplan Areas and the kind of major infrastructure needed, such as the Western Link, simply takes time to come to fruition.
- 3.2 Our view is that residential-led town centre regeneration initiatives should be driven by the Council and its partners irrespective of the overall housing requirement and the claimed yields from this source should not be at the expense of sites that are known to be deliverable and attractive to the housing market. At the very least, contingency measures should be in place to monitor the delivery of market and affordable housing in and around town centres in order that additional land is made available early in the plan period should it become apparent that an insufficient pipeline of viable new developments are coming forward within or around the town centre. A more robust (and evidence led) approach however would be to ensure that a sufficient quantum of deliverable sites are identified now as Housing Allocations within the WLP.
- 3.3 The Urban Capacity Assessment provides the basis for the assumptions that have been reached in respect of the overall yield and rate of delivery from the various sources of housing land supply. Appendix 2 sets out the Housing Trajectory and this confirms the following in respect of housing delivery within the plan period 2017/18 to 2036/37:

Table 3: Anticipated yield of dwellings during the plan period from the Town Centre and Waterfront masterplanning areas

Area	Total dwellings 2017-2037	Average dpa from first completion
Town Centre	4,007	236 (from 2020/21)
Waterfront	2,542	141 (from 2019/20)
Total	6,549	377 (from 2019/20)

- 3.4 The pertinent factors to consider when assessing whether there is a realistic possibility that the full yield of 6,549 dwellings will be delivered within the plan period as claimed are as follows:

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

Consideration of past trends in respect of housing completions

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

Table 4: Anticipated yield of dwellings during the plan period from the Town Centre and Waterfront masterplanning areas

Year	2008 / 09	2009 / 10	2010 / 11	2011 / 12	2012 / 13	2013 / 14	2014 / 15	2015 / 16	2016 / 17	2017 / 18	10 yr Average 2008-2018
Net annual completions	633	388	527	600	647	693	687	595	513	359	564

3.5 Table 3 confirms that if the full yield of dwellings from the Town Centre and Waterfront areas is to be achieved, then an average completion rate of 377 dwellings per annum needs to be achieved from first completions, which are anticipated at Waterfront from this this monitoring year (2019/20). This represents 67% of the historic completion rates across Warrington as a whole. At face value this seems to be a wholly unrealistic claim given that a large number of past completions came from the Chapelford Urban Village Strategic site and so this rate of delivery from the Town centre Area alone represents a significant step change.

3.6 Appendix 4 of the SHLAA sets out the basis of the justification for the housing densities that have been applied in respect of sites within the Waterfront and Masterplan areas and this also provides an indication of past delivery rates within these areas.

Is the Town Centre and Waterfront Masterplan realistic?

3.7 Redrow are aware of the recent initiatives taken by Warrington Council and their partners Warrington & Co to direct new housing towards the Town centre and Waterfront Area, which have manifested

themselves in the Town Centre masterplan that forms part of the evidence base supporting the Local Plan. However, it is evident that the identified housing sites within the town centre will only come forward as part of a comprehensive regeneration of large parts of the existing heart of the City. The sites making up this source of the supply are complex. In most instances they have active uses, varied ownerships and face considerable physical constraints to their development. The majority will only be able to come forward for development in conjunction with adjacent sites, and many require significant infrastructure provision before they can be delivered.

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

Flood Risk and other constraints

- 3.9 With reference to the Masterplan (Ref: 60582049/04_004 Rev B 03/03/2019) we have looked at some of the development parcels in more details to see whether they can be considered to be developable in line with the NPPF definition, i.e. *'a reasonable prospect that they will be available and could be viably developed at the point envisaged'*. One of the primary concerns in this regard is flood risk. Table 5 below provides a summary of our findings in respect of the parcels that Redrow do not consider to be developable as a result of flood risk concerns or for other reasons :

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

Parcel ref/location	Total Yield 2017-37 (First completions)	Reason why the parcel is not considered to be deliverable or developable
I4 & I5 Southern Gateway	129 (Yr 6-10)	Wharf Industrial Estate. Operated by Langtree and the 31 units are largely occupied. The majority of tenants will be in longer term tenancies. Appears to be in viable economic use and the land falls entirely within Flood Zones 2 and 3.
K5, K7, K9, K10, K12 Waterfront	2,422	EIA Screening request (Ref: 2018/33236) for 1,628 residential dwellings on Land at Haviland Park, Lily Waring Gardens and William Square, Arpley Meadows, Warrington (relates to parcels K5 and K7). Confirmed that the proposals constitute EIA development as significant concerns exist in relation to (amongst other matters) flood risk, the delivery of the Western Link, the presence

		of an 8 inch high pressure ethylene pipeline and the delivery of other necessary infrastructure such as a school, health facility and small scale retail and leisure. Given the extent of the environmental constraints raised and the fact that the site lies partly within and is entirely surrounded by Flood Zone 3a, it is difficult to understand how this site passes both the Sequential and Exception tests when considered against all reasonable alternatives. The same concerns therefore also exist in relation to Parcels K9, K10 and K12.
I6 to I21 Southern Gateway	650	The entire area falls within Flood Zone 2. Again, there are concerns with these parcels regarding whether the Sequential and Exception Tests can be satisfied and the technical drainage solution that would be required brings in to question the viability of developing these parcels, particularly when an abundance of better-placed land is available within Flood Zone 1 elsewhere in the borough.
Total	3,201	

- 3.10 Redrow therefore have real concerns regarding the delivery of around half of the claimed yield from the Town Centre and masterplan areas on the basis that there is simply a lack of compelling evidence presented that this is the most appropriate solution to deliver Warrington’s housing needs. Added to this, it would be fair to say that Warrington town centre does not have an established market for high quality town centre living, or the key physical and social infrastructure in place that would make the town centre a desirable place in which to live. These essential building blocks take a long time to implement.
- 3.11 Aside from the above, the residential parcels on the Masterplan simply wash over large areas of land that falls within multiple land ownerships, or is multi-tenanted and with no advanced CPO strategy it is Redrow’s view that a considerable allowance must be made for the non-delivery of sites within this areas, yet no such allowance has been made.
- 3.12 Taking the above into account and to ensure that a realistic view can be taken on the likely (i.e. ‘developable’) yield of housing from this source an appropriate discount should be applied as the evidence clearly points towards this. The level of reduction from the Town Centre and Waterfront Areas is considered in more detail later in this section, as we now go on to consider the implications of the essential infrastructure that is required to deliver this quantum of housing in this location.

Infrastructure Delivery and Viability Considerations

Viability Considerations

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

Table 6: Viability considerations in respect of Major Residential Schemes approved within the Town Centre and Inner Warrington determined within last 3 years

Plan App Ref	Site Address	No. of units	Viability Case (Y/N)	Section 106?
2017/31394	Land at Winwick St / John St, Warrington	362	Y	Y – Only £75,000 towards the Council's costs in connection with the Travel Plan. No wider infrastructure contributions.
2018/32301	107 Sankey Street, Warrington	18	N/A	N – Scheme therefore makes no wider infrastructure contributions.
2017/31148	Former Kwik Save, Academy Street, Warrington	144	Y	Y – only £70,000 for highways works related to the development. No wider infrastructure contributions.
2017/31836	Former Town Hill Chambers, 1 Town Hill, Warrington	24	N/A	N – Scheme therefore makes no wider infrastructure contributions.
2018/31871	Former A J Beer and Co Timber Yard Site, Station Road, Latchford, Warrington, WA4 2AD	189	Y	N – Scheme therefore makes no wider infrastructure contributions.

- 3.14 Of the 5 major residential schemes determined within the last 3 years, none of the schemes have been able to withstand any Section 106 contributions towards wider infrastructure needs, such as education, health, open space or strategic infrastructure provision. The three schemes 'of scale' were all subject to Viability Assessments and the findings were subsequently (and consistently) found to be accurate and so accordingly the usual Section 106 contributions were not requested.
- 3.15 There is therefore quite clearly a viability issue with existing sources of Housing Land Supply in the Warrington Town centre and Inner Warrington, which is entirely consistent with the historic low levels of housing delivery in these areas.
- 3.16 The Local Plan Viability Assessment prepared by BNP Paribas Real Estate does nothing to confirm that Town centre sites are indeed deliverable or viable by stating:

“The Town Centre site is predominantly on previously developed land. The types of existing uses on the site are diverse and it is not possible within the confines of an area-wide viability assessment to undertake a detailed analysis of the likely value of each site. For the purposes of the exercise, we have assumed that a hectare of land has a benchmark land value ranging from £370,000 to £865,000.”

- 3.17 The only tangible evidence that can be relied upon therefore in respect of the viability of individual sites in the Town centre and above is the evidence presented at Table 6 above, which confirms that a viability issue exists.
- 3.18 We now consider the infrastructure that is required to be delivered to facilitate the delivery of around 6,500 dwellings in the Warrington Town Centre and Waterfront areas.

Infrastructure Delivery

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

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

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

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

Topic	Indicative Cost	Funding Confirmed	Funding gap	Funding Source
Provision of Country Park, open space	TBC	Unknown	Unknown	Developers / private sector
Provision of playing pitches	TBC	Unknown	Unknown	Developers / private sector
New primary school provision providing a minimum of 2 forms of entry	£7,500,000	£0	£7,500,000	Developers / private sector
Centre Park Link	£19,900,000	£19,900,000	£0	WBC and Local Growth Fund
Local Road Network*	£28,829,000	Unknown	£28,829,000	Developers / private sector
Strategic Greenways	£5,000,000	£0	£5,000,000	Developers / private sector
River Mersey Footbridge	£2,000,000	£0	£2,000,000	Developers / private sector
New Health Facility	TBC	Unknown	Unknown	CCG/NHSE
TOTAL**	£63,229,000	£19,900,000	£43,329,000	

* Included in Local Plan Viability Assessment as Strategic Infrastructure costs.

** As yet unknown infrastructure costs related to the provision of a new Country Park, playing pitches and a

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

Topic	Indicative Cost	Funding Confirmed	Funding gap	Funding Source
Local Road network				
Bridgefoot link and Brian Bevan island	£7,200,000	£0	£7,200,000	DfT and WBC (Concept only)
High Level cantilever bridge crossing replacement	£55,000,000	£0	£55,000,000	Developers / private sector
Southern Gateway Development Access Framework	TBC	Unknown	Unknown	Concept only
Warrington North Pinchpoints (A49 corridor)	TBC	Unknown	Unknown	Concept only
Stadium Quarter Highway Improvement Package (Warrington Transport Improvements Package)	TBC	Unknown	Unknown	Concept only
Other				
Riverside (North of Mersey) Access improvements for cycling and pedestrians, including new walkways	£2,500,000	£0	£2,500,000	Developers / private sector
Town Centre Electricity Network Reinforcement	£26,000,000	£0	£26,000,000	Subject of HIF Bid / Early stage feasibility costs
Cockhedge Medical Centre	TBC	Unknown	Unknown	Expansion needed to accommodate projected growth
TOTAL*	£90,700,000	£0	£90,700,000	

*A number of infrastructure costs are not known and/or are at concept stage and so this figure is considered to represent a significantly suppressed figure as it relates to essential infrastructure delivery in and around the Town Centre.

- 3.21 What is apparent is that there is a significant level of infrastructure required to facilitate the delivery of the housing in the Town Centre and Waterfront Areas, despite the fact there are significant and known viability issues to stand even the standard Section 106 requirements.
- 3.22 Looking at Table 7 in respect of the Waterfront Area, not only are these infrastructure costs significant, there is also an expectation that the private sector / developers will provide the necessary

funding gap and some of the cost items remain unknown. More clarity on the viability considerations is required as is more certainty about the delivery of this infrastructure.

- 3.23 Even more alarming is the current situation with regard infrastructure delivery in the Town Centre. What is apparent is that significant investment is required into the local road network to facilitate this level of development and quite clearly at this stage, the Council have simply not prepared a credible or robust evidence base in respect of how this infrastructure is to be delivered.
- 3.24 Circa £90m of known necessary infrastructure costs has been provided, for which no funding has currently been secured. There also appears to be a burden on the private sector and developers to provide the £55m towards the high level cantilever crossing bridge and no doubt the same will be expected of the majority of the other road network improvements. This is despite the clear evidence (which has been presented here by Redrow) that there is a fundamental viability issue when bringing forward sites for residential development within the Town Centre and Inner Warrington.
- 3.25 Putting this in to context, the Local Plan Viability Assessment uses a variety of benchmark assumptions when assessing the viability of sites in different areas. In respect of the Town Centre, two scenario's were applied in respect of Section 106 / CIL costs; Scenario 1 assumed £2,500 per unit and Scenario 2 £5,000 per unit. The viability appraisal that was run confirmed that just 20% affordable housing was considered viable in the Town Centre under both scenarios. At Waterfront, contributions of £9,201 were assumed and again the maximum affordable housing contribution was 20%.
- 3.26 Equating this in to Section 106 contributions, the following table demonstrates the maximum level of Section 106 contribution that could be achieved under either scenario this is of course hypothetical given that these levels of contribution are not considered to be achievable for the reasons stated above:

Table 9: Local Plan Viability Assessment benchmark Section 106 assumptions for the Town Centre and Waterfront Area

Area	Scenario / contribution per unit	Units	Maximum Section 106 / CIL Contributions
Town Centre	Scenario 1 / £2,500	4,007	£10,017,500
Town Centre	Scenario 2 / £5,000	4,007	£20,035,000
Waterfront	£9,201	2,542	£23,388,942

- 3.27 With reference to Table 9 above, in respect of the Town Centre there is currently a £57.6m funding gap (in addition to the other items not yet costed) that is expected to met through developer and private sector contributions. So even if every site was found to be viable and delivered a maximum 20% affordable housing, it is quite clear that a massive deficit exists and the infrastructure needed to support this level of development will simply not be delivered. The same logic can be applied to the Waterfront where a minimum £43m funding gap exists. Even with the inflated contribution of £9,201 per unit, there is still a huge deficit.
- 3.28 Redrow's view is that a realistic stance must be taken in respect of what is actually viable to deliver in respect of all considerations. At present, there appears to be a disconnect between the quantum of residential development proposed in the Town Centre and Waterfront Areas and the associated viability considerations in respect of the infrastructure needed to support that level of development. At this stage it is quite clear that this quantum of sites cannot be considered 'developable' as there is not a 'reasonable prospect' that these sites 'could be viably developed at the point envisaged' and so on that basis an alternative housing strategy must be adopted in order that the Plan can be found to be sound.

Timing of Infrastructure Delivery and the Western Link Road

- 3.29 With reference to the Housing Trajectory provided at Appendix 2 of the Urban Capacity Study, another factor that does not appear to have been given due consideration is the impact that the timing of infrastructure delivery will have. The IDP is clear that there is an expectation for the identified infrastructure to be delivered in order that the quantum of residential development proposed can be justified. Yet the Housing Trajectory seems to suggest that 3 years from now, by 2021/22 (at the end of Years 1-5 of the plan period), a total of 1,240 dwellings will have been completed in the Town Centre and Waterfront Areas alone and in Years 6-10 (by 2026/27, or less than 8 years from now) a further 2,348 will be completed, or 3,588 in total (55% of all dwellings from these sources). This simply ignores the reality of the time it takes to deliver major road infrastructure and in this case the Western Link Road in particularly is key.
- 3.30 The importance of the Western Link Road is set out at paragraph 2.3 of the Infrastructure Delivery Plan, which states:

"The Plan's main priority remains to optimise the development potential of the existing urban area. As such a number of key elements of the previous Plan's spatial strategy therefore

remain. This includes intensifying development in the town centre, the inner area of Warrington and opening up the Waterfront as a new urban quarter facilitated by the proposed Western Link.”

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

3.32 Funding was finally approved in April 2019 and the Council have confirmed that over the next two years they will:

“develop detailed designs, submit a planning application, acquire land required for the scheme, undertake the relevant ecological, environmental and flood risk assessments and engage with residents, businesses and stakeholders, in addition to a number of other significant work packages. We’ll also need to develop an extensive work schedule for the delivery of the Western Link which will constitute one of the largest engineering projects in the North West.” (Source: <https://www.warrington.gov.uk/westernlink>)

3.33 This is a significant infrastructure project that will take years to deliver and so the housing trajectory for the Town Centre and Waterfront in particular needs to allow for an adequate lead-in time for this key piece of infrastructure to be delivered. The route requires bridge crossings to be constructed over the Manchester Ship canal, the West Coast Main Line and Walton viaduct, River Mersey, Fiddler’s Ferry and Sankey Brook, Liverpool Road and the St Helens Canal. This is a major engineering operation that requires land acquisition (and most likely CPO), the negotiation of easements and then the time needed to construct the entire route including all the structural work associated with the bridges. Being generous and in the absence of a published delivery timetable, Redrow’s view is that a period of at least 10 years should be allowed for the delivery of this major piece of infrastructure. Accordingly, the housing trajectory should reflect this, in particular at Waterfront.

Summary and Recommended Changes

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

- a. The proposed annual completion rate of 377 dpa from the Town Centre and Waterfront areas is considered to be overly optimistic in consideration of past trends in Warrington;
 - b. A number of the identified SHLAA sites lie within Flood Zones 2 and 3 and so from a sequential perspective, other sites are available and better placed to meet housing needs within Flood Zone 1, especially within the context of the Green Belt review that is being undertaken as part of the Local Plan preparation process;
 - c. The complexity of land ownership and tenancies has not been taken into account when producing the Town Centre Masterplan and so a non delivery rate must be applied from this source of housing land supply;
 - d. The considerable length of time needed to deliver the Western Link Road has not been factored in to the Housing Trajectory for the Waterfront Area in particular and so a considerable lead-in time should be allowed for before the development can be considered capable of delivering a significant quantum of housing (10 years is suggested).
- 3.35 In order to assist, Redrow now seek to quantify the reduction that should be applied taking these fundamental concerns in to account and the following summarises the recommended position.

Table 10: Redrow's position in respect of the discount that should be applied to the housing trajectory for the Town Centre and Waterfront Areas

Description	Town Centre	Waterfront
Total dwellings in Urban Capacity Assessment 2017-2037	4,007	2,542
<p><i>Flood Risk (with reference to Table 5 of this representation)</i></p> <p>Town Centre –</p> <p>Parcels I4 and I5 (a total of 129 units) - Wharf Industrial Estate. The land falls entirely within Flood Zones 2 and 3. Also, the 31 units are largely occupied, so appears to be in viable economic use;</p> <p>Parcels I6 to I21 (a total of 650 units) - lie entirely within Flood Zone 3a and should be removed from the developable supply on the basis that sequentially, other more suitable sites are available in Flood Zone 1).</p> <p>Waterfront –</p> <p>Parcels K5, K7, K9, K10, K12 are partially within Flood Zones 2 and 3a and so a reduction of the site's total capacity of 2,422 dwellings (-25% suggested based upon the area of land affected by flood risk) should be applied, which equates to 606 dwellings</p>	-779	-606
<p><i>Non-delivery rates</i></p> <p>Town Centre –</p> <p>A 20% non-delivery rate applied to the remaining Town Centre sites (4,007-779 = 3228) given the land ownership and tenancy complexities set out above</p>	-646	
<p>A significant lead-in time (10 years) applied to the Housing Trajectory for the Waterfront Area to allow for the delivery of the Western Link Road. Adjusting the trajectory so that first completions now begin at 2027/28 would see this source of housing land supply reduce by 595 dwellings.</p>		-595
Redrow Total following reductions	2,582	1,341
Total shortfall in supply from Warrington Town Centre and Waterfront masterplan areas	-2,626	

- 3.36 This in our view still remains a very generous assessment as the principle and achievability of housing on the vast majority of the identified sites in terms of technical considerations has not been demonstrated in any detail. Neither can the market appetite for bringing these sites forward be assumed with any confidence. Given the constraints and considerations associated with facilitating this kind of comprehensive regeneration of a town centre, the current yield from this source of Housing Land Supply is considered to be wholly unrealistic.
- 3.37 In Redrow's view, it is therefore a considerable risk for the Warrington Local Plan housing strategy to be relying on sites within Warrington Town Centre and the Waterfront Area to make such a significant contribution towards housing needs over the Plan Period. In light of the concerns outlined above, which go to the heart of the soundness of the Local Plan, **a discount of 2,626 dwellings should be applied to this particular source of housing land supply and new sites should be identified for housing development to make up this shortfall.** In this case it would need to be additional sites released from the Green Belt.

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

4.1 Another area of concern is whether realistic assumptions have been made in respect of the anticipated number of dwellings to be delivered within the existing urban area and whether they are founded upon credible evidence.

4.2 The recently revised NPPF (2019) has confirmed the definition of what constitutes a deliverable and developable site. Annex 2 of the NPPF (2019) states:

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

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

4.3 It goes on to state:

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

4.4 The Planning Practice Guidance (PPG) requires that:

“strategic policy-making authorities will need to provide robust, up-to-date evidence to support plan preparation. Their judgements on deliverability of housing sites, including windfall sites, will need to be clearly and transparently set out.”

4.5 Paragraph 90 of the NPPF states that:

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

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

Assessment of claimed supply from the Wider Urban Area

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

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

‘3.8 It is acknowledged that a specific allowance is not made for the non-delivery/implementation of sites/permissions in the SHLAA. This is because the deliverability of every site is reassessed annually and up-dated. Sites where planning permission has expired or were[sic] a consent for an alternative use has been granted are either removed from the deliverable supply or pushed back into the developable 6-10 or 11-15 year supply, as is considered appropriate.’

4.9 This suggests that SHLAA sites that have been the subject of a now expired planning permission could still remain within the ‘developable’ housing land supply, but have simply been pushed further back into the plan period. It is incumbent upon the Council, as set out in Planning Practice Guidance, to

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

'Where potential problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome.' (Paragraph: 020 Reference ID: 3-020-20140306).

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

Summary and Recommended Changes

- 4.13 In order to account for the potential (and as the evidence suggests, likely) non-delivery of some SHLAA sites within the 'Wider Urban Area' Redrow are of the view that a non-delivery rate of 10% should apply. The quantum of housing from this source of housing land supply should therefore be **reduced by 413 units, resulting in a total supply of 3,720 from this source.**

5 Analysis of Warrington Garden Suburb (Policy MD2)

5.1 Redrow do not object to the principle of including the Garden Suburb as a Main Development Area within the WLP, but it is necessary to test whether the site is capable of delivering the level of housing set out within the Housing Trajectory provided at Appendix 2 of the Urban Capacity Assessment. Specifically, the following factors need to be considered:

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

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

Baseline Position

5.3 The housing trajectory confirms that the Garden Suburb is anticipated to deliver 5,131 dwellings during the plan period. 45 dwellings have been completed in the first year of the plan (2018/19), a further 205 completions are expected during the current monitoring year and average completions of 220 per annum are then anticipated to be achieved throughout the remainder of the plan period.

5.4 This is over a quarter (27%) of the overall housing requirement of 18,900 established under Policy DEV1, and so it is essential that the assumptions being used to underpin this rate of housing delivery are robust and realistic.

5.5 The Garden Suburb Development Framework forms part of the WLP evidence base and so underpins the proposed housing trajectory. It confirms that Homes England own the greatest proportion of the site and the remainder lies within multiple ownerships. A Phasing Strategy is provided, which sees the residential element delivered in three phases, with the Village Centre, Employment Area and associated infrastructure incorporated around each phase. There is little by way of analysis to establish the specific timing of each phase within the document and there is also no evidence

provided as to the justification of the build out rates for each phase. We now go on to consider these matters in more detail.

Lead-in time and delivery rates

- 5.6 The housing trajectory separates out the 'HCA Sites' as this is land that is not within the Green Belt and benefits from planning permission, equating to a total of 930 units and so we consider this element first. This comprises Phase 1 of the Garden Suburb Phasing Strategy. Three separate planning permissions have been approved, the first for 180 homes on land at Pewterspear Green Road, the second for 370 homes at Appleton Cross and 400 homes at Grappenhall Keys in October. Barratt are currently on site at Pewterspear Green Road and so the initial lead in time relating to this site is considered appropriate.
- 5.7 The housing trajectory then anticipates that all 930 dwellings will be completed by 2023/24. However, at this point in time only the initial 180 homes have detailed consent, the remainder still only benefit from outline planning permission and developers have not yet been formally selected. We do not question that the full 930 homes will be delivered during the plan period, but do have concerns with regard to the rate of delivery that is envisaged within the housing trajectory, both for the Phase 1 HCA Sites and Phases 2 and 3 sites that currently lie within the Green Belt.
- 5.8 In order to test the delivery rates set out within the housing trajectory, we rely upon the following evidence:
- The conclusions reached by Warrington Council in respect of housing delivery rates in the SHLAA;
 - Industry research in respect of delivery rates on major strategic sites as set out in the 'Start to Finish – How Quickly do Large-Scale Housing Sites Deliver?' paper produced by Nathaniel Lichfield & Partners in November 2016.
- 5.9 Appendix 6 of the SHLAA contains Build Rates Analysis based upon the actual timescales that housing sites have taken to deliver. It was found that on sites with a capacity of greater than 150 homes, an average build rate of 57 dwellings per annum was achieved. There are however limitations to the use of this figure as it relates to the Garden Suburb, as it is a 'single site'. It is appreciated that there are multiple ownerships and so there could be more than one sales outlet operating at any one time,

however the rate of delivery will be at a pace commensurate with the infrastructure needed to support the intended level of development in line with the phasing strategy set out in the Development Framework and the ability of the local housing market to ‘absorb’ the houses being delivered.

5.10 The impact that multiple sales outlets have upon delivery rates was considered within the ‘Start to Finish – How Quickly do Large-Scale Housing Sites Deliver?’ research paper, which confirms the following:

“Our analysis also identifies that, on average, a site of 2,000 or more dwellings does not deliver four times more dwellings than a site delivering between 100 and 499 homes, despite being at least four times the size. In fact it only delivers an average of 2.5 times more houses. This is likely to reflect that:

- it will not always be possible to increase the number of outlets in direct proportion to the size of site – for example due to physical obstacles (such as site access arrangements) to doing so; and*
- overall market absorption rates means the number of outlets is unlikely to be a fixed multiplier in terms of number of homes delivered.”*

5.11 It is acknowledged that the multiplier of 2.5 is a national average, which would take into account varying housing markets. In this instance, Redrow consider this area of south Warrington to be an attractive housing market and so a higher than average delivery rate could potentially be achieved. Redrow will therefore take the pragmatic view that a multiplier of 3 could be applied to the build rates at the Garden Suburb with reference to the Nathaniel Litchfield research.

5.12 Applying this to the Average Build Rate per year in Warrington of 57 dpa on sites delivering between 100 and 499 homes would result in a maximum completion rate of 171 dpa from the Garden Suburb at any given point in time. This suggest that at any given time there will be around 3 sales outlets operating at the same time, each achieving their maximum potential of 57 dpa throughout the entirety of the plan period. This evidence is also reflective of Redrow’s experience of delivery rates at Buckshaw Village in Chorley, which is another site consisting of more than 2,000 dwellings.

5.13 When applying this rate of delivery to the housing trajectory, it will also take in to account the initial lead in period necessary for individual sites within each phase to obtain the necessary planning consents, undertake the initial ground works and infrastructure and then increase construction activity from the start up to full capacity. This is considered to be an appropriate approach to take in respect of the Garden Suburb in light of the available evidence and established industry research.

5.14 This would therefore result in an alternative housing trajectory for the Garden Suburb and the following table demonstrates the revision that is proposed by Redrow:

Table 11: Redrow Assessment of the Garden Suburb Housing Trajectory

Year	Years 1-5				Years 6-10					Y11-15	Y16-20	Total	Difference
	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/32	32/37		
HCA sites (SHLAA)	45	204	225	180	180	96						930	
HCA Sites (Redrow)	45	171	171	171	171	171	30	0	0	0	0	930	0
GB Aecom Masterplanning (SHLAA)	0	0	0	0	0	108	260	368	363	1,641	1,461	4,201	
GB Aecom Masterplanning (Redrow)	0	0	0	0	0	0	141	171	171	855	855	2,193	-2,008
TOTAL (SHLAA)	45	204	225	180	180	204	260	368	363	1,641	1,461	5,131	
TOTAL (Redrow)	45	171	171	171	171	171	171	171	171	855	855	3,123	-2,008

5.15 As stated earlier, Redrow do not question or object to the inclusion of the Garden Suburb whatsoever, nor are the lead in times questioned in any way. In this regard, Redrow's assessment set out in Table 11 above is considered to be very generous in respect of lead in times as the trajectory above assumes the HCA Sites are delivering at full capacity from this monitoring year.

5.16 The importance of not overly-relying upon Strategic Sites to deliver the overall housing requirement is one of the subjects that was considered in the House of Commons Briefing Paper 'Tackling the under-supply of housing in England'¹. The Paper confirms that the Home Builders federation (HBF) supports the identification of a range of site sizes in order to meet local housing needs, and should not seek to rely upon one large site to deliver it and the findings of the Nathaniel Litchfield & Partners

¹ House of Commons Library Briefing Paper Number 07671, 12 December 2018 'Tackling the under-supply of housing in England', written by Wendy Wilson and Cassie Barton

research was highlighted when making this point, with the following extract from the research note included within the Briefing Paper (at Page 57):

“Large-scale sites can be an attractive proposition for plan-makers. With just one allocation of several thousand homes, a district can – at least on paper – meet a significant proportion of its housing requirement over a sustained period. Their scale means delivery of the infrastructure and local employment opportunities needed to sustain mixed communities.

But large-scale sites are not a silver bullet. Their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick start. And once up and running, there is a need to be realistic about how quickly they can deliver new homes. Past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result”

- 5.17 As demonstrated above, the need to be ‘realistic’ about how quickly strategic sites can be deliver new homes is a pertinent point in respect of the Garden Suburb. This is particularly important in Warrington as land is required to be released from the Green Belt in any case to meet identified housing needs.
- 5.18 In line with the approach taken above and in the absence of any compelling evidence to the contrary, Redrow’s view is that the Garden Suburb will fall short of the 5,131 homes it is anticipated to deliver by 2037 and whilst there is no doubt that the site will continue to deliver homes to its full capacity beyond 2037, the role of the Local Plan is to identify sufficient land to meet identified housing needs within the plan period. Our view therefore (with reference to Table 11) is that there will be a shortfall of around 2,008 dwellings from this particular source of housing land supply that will need to be accounted for through the identification of additional alternative sites within the Green Belt.

Benchmarking our assumptions – Chapelford Urban Village

- 5.19 A good test of the assumptions outlined above and a comparable example is Chapelford Urban Village, which is a major strategic site to the west of Warrington. The site initially obtained planning permission in 2002, first completions were in 2004 and a total of 2,110 homes were subsequently delivered up until 2017. Over a period of 13 years therefore, an average build rate of 162 dpa was achieved at Chapelford, which is entirely consistent with the evidence presented here by Redrow in respect of the anticipate rate of delivery at the Garden Suburb, i.e. 171 dwellings per annum.

5.20 There is therefore an overwhelming body of evidence, both locally and nationally that supports Redrow's view in respect of the quantum of housing that will realistically be delivered at the Garden Suburb during the plan period 2017 to 2037.

Summary and Recommended Changes

5.21 In order to account for the likely shortfall in housing delivery from this site (as evidenced) Redrow are of the view that the 5,131 homes identified to be delivered from this source of housing land supply during the plan period under Policy DEV1 should **be reduced by 2,008 units, resulting in a total supply of 3,123 from this source.**

6 Analysis of South West Urban Extension (Policy MD3)

- 6.1 Having reviewed the evidence base, there is a distinct shortage of technical or background information available in respect of the deliverability of the South West Urban Extension (SWUE). Redrow consider this to be a shortcoming that will need to be addressed if the site is to be considered suitable for inclusions as a Housing Allocation (and released from the Green Belt) in light of all other reasonable alternatives.
- 6.2 Aside from further evidence being provided in respect of deliverability, the primary factor that will determine the likely number of homes that the SWUE is capable of delivering during the plan period will be the lead-in time required for key infrastructure to be in place and in this case it is the Western Link. Policy MD3 confirms that the scale of development proposed at the SWUE cannot be accommodated by the A56 and so it is 'essential that development is co-ordinated with the delivery of the Western Link.'
- 6.3 Redrow do not wish to reiterate the same points here related to the timescales required for the delivery of the Western Link set out at paragraphs 3.29 to 3.33 of this representation, but the same principle applies here as it does in respect of the rate of development at the Waterfront Area.
- 6.4 The Western Link is a significant infrastructure project that will take years to deliver and so the housing trajectory for the SWUE needs to allow for an adequate lead-in time for this key piece of infrastructure to be delivered. The route requires bridge crossings, land acquisition (and most likely CPO), the negotiation of easements and then the time needed to construct the entire route. Being generous and in the absence of a published delivery timetable, Redrow's view is that a period of at least 10 years should be allowed for the delivery of this major piece of infrastructure. Accordingly, the housing trajectory should reflect this.
- 6.5 In consideration of the intended delivery rates of 116/117 dwellings per annum once development gets underway, Redrow are satisfied that this is an appropriate rate of delivery in line with local evidence and national research (as set out in paragraphs 5.8 to 5.12 of this representation), subject to more evidence being provided in respect of deliverability.

- 6.6 To allow for sufficient lead-in time for the delivery of the Western Link, Redrow's view is that the housing trajectory for SWUE should be adjusted so that first completions now begin at 2027/28. This would see this source of housing land supply reduced by 466 dwellings.

Summary and Recommended Changes

- 6.7 In order to account for an adequate lead-in time for delivery of the Western Link, Redrow are of the view that the 1,631 homes identified to be delivered at the South West Urban Extension during the plan period under Policy DEV1 should **be reduced by 466 units, resulting in a total supply of 1,165 units from this source.**

7 Summary of Recommended Changes in respect of the stated Housing Land Supply Position (Policies DEV1, MD1, MD2 and MD3)

- 7.1 The previous sections of this representation set out the basis of the analysis undertaken by Redrow and a series of recommended changes, which are primarily adjustments deemed necessary in respect of the proposed housing trajectory from various sources of housing land supply.
- 7.2 In order to illustrative the cumulative effect of these recommended changes, the following table provides a summary of Redrow's stated position.

Table 12: Summary of Redrow's overall position in respect of the Housing Land Supply shortfall

Source of Housing Land Supply	WLP Housing Trajectory 2017-37	Redrow discount	Redrow Housing Trajectory 2017-37
Warrington Town Centre	4,007	-1,425	2,582
Waterfront	2,542	-1,201	1,341
SHLAA Sites outside Town Centre	4,133	-413	3,720
Warrington Garden Suburb	5,131	-2,008	3,123
South West Urban Extension	1,631	-466	1,165
TOTAL	17,444	-5,513	11,931

- 7.3 None of the other sources of housing land supply are disputed by Redrow.
- 7.4 On this basis, Policies DEV1, MD1, MD2 and MD3, which go to the heart of the housing strategy for Warrington cannot be considered to be sound in the context of paragraph 35 of the Framework as they are currently informed by an overly optimistic housing trajectory that is not justified in the light of all available evidence.
- 7.5 The baseline housing supply position set out within these policies must therefore be reduced by a total of 5,513 dwellings. It is imperative that this adjustment is made, because the Council's current stated position is that exceptional circumstances exist to release land from the Green Belt taking in to account the housing requirement of 18,900 and the baseline housing land supply position. A failure to deliver the baseline housing land supply position in this situation would result in housing needs

not being met within the plan period, with no scope for flexibility because of the Green belt constraints that exist.

- 7.6 Given the scale of the reduction deemed necessary by Redrow, it is clear that additional Green Belt sites of varying scales need to be identified as Housing Allocations in order that a deliverable supply remains available throughout the plan period and that market and affordable housing needs are met in full.
- 7.7 Redrow now provide further details of two suitable sites that are being promoted for residential development, which would go some way towards making up this considerable shortfall.

8 Suggested Site Allocation: Land west of Culcheth, Warrington

- 8.1 It is in the context of the analysis undertaken within this representation that Redrow are promoting land to the west of Culcheth as a suitable site for residential development. The Call for Sites reference and description is R18/P2/020; Land at Kinknall Farm.
- 8.2 A detailed site specific representation and a Masterplan and Development Report prepared by Cass Associates on behalf of Redrow is provided at Appendix A and this clearly demonstrates that the site is appropriate for release from the Green Belt. The report also confirms that the site is available, suitable and achievable with a realistic prospect that housing will be delivered on the site within five years. It can therefore be considered 'deliverable' in accordance with the definition provided at Annex 2 of the NPPF (2019). The site is being promoted by Redrow, who are a major housebuilder with a proven and long-established track record of housing delivery in the northwest.
- 8.3 Redrow have identified a significant shortfall in respect of the Council's claimed housing land supply position, equating to a total of 5,513 dwellings. This needs to be accounted for through the identification of new Housing Allocations and this site is one such location, capable of delivering around 350 to 450 new homes, which will go some way towards helping to meet this identified shortfall.
- 8.4 We now go on to provide the justification to direct additional housing growth towards Culcheth as a settlement.

Justification to identify new Housing Allocations in Culcheth outside of the existing urban area

- 8.5 It has been accepted through the preparation of the WLP that exceptional circumstances exist to justify the release of Green Belt land to meet housing needs. Redrow support this conclusion. The WLP also seeks to distribution towards some of the outlying settlements in Warrington. Redrow also support the intention to meet local housing needs in outlying settlements, not just within Warrington itself.
- 8.6 As part of this housing strategy, the WLP intends to distribute a minimum of 200 homes towards Culcheth and has identified a single Housing Allocation under Policy OS3 – Culcheth, 'Land East of Culcheth' within the Green Belt in order to meet this target.

- 8.7 The first point to make is that the Preferred Development Option Consultation (July 2017) proposed a distribution figure of 300 for Culcheth and so there has been a significant (and unjustified in Redrow's view) reduction in the housing target for Culcheth, which is the second largest outlying settlement behind Lymm.
- 8.8 The Settlement Profile for Culcheth that formed part of the Evidence Base for the 2017 consultation and the Masterplan and Development Report provided at Appendix A of this representation confirm the wide range of shops and services that are available within Culcheth, which is entirely consistent with the size of the settlement and its high levels of accessibility. Critically, this includes the wide range of shops and services in Culcheth Neighbourhood Centre, a secondary school, three primary schools, Culcheth Medical Centre, a pharmacy, 2 dentists, sports and play provision, amongst other facilities.
- 8.9 The sustainable credentials of Culcheth and its size and status in the outlying settlement hierarchy as confirmed by the evidence base justify a much higher housing distribution figure than the 200 dwellings currently proposed, particularly as the settlement is surrounded by Green Belt and the urban area provides limited capacity to contribute towards local housing needs, including affordable housing. Given the significant concerns that Redrow have outlined in Sections 3 to 7 of this representation and the anticipated shortfall of c.5,500 dwellings from existing sources of housing land supply, the role of the outlying settlements to make a significant contribution in respect of housing delivery becomes critical.
- 8.10 When compared to the other outlying settlements, it is apparent that there is a constrained level of housing growth proposed in Culcheth despite the capacity of the settlement to accommodate a much higher number. Table 13 overleaf assesses each of the settlements in respect of their existing size and the percentage level of housing growth proposed in the WLP. Proportionally, Culcheth has the lowest level of housing growth proposed (just 8%) and the entire quota is intended to be delivered on a single site.
- 8.11 There is absolutely no justification to constrain the level of housing growth in Culcheth to this extent.

Table 13: Summary of WLP distribution towards the outlying settlements and comparison with the 2017 Preferred

Settlement	No. of existing households	WLP minimum requirement	% increase in households
Burtonwood	1,427	160	11%
Croft	606	75	12%
Culcheth	2,495	200	8%
Hollins Green	371	90	24%
Lymm	4,961	430	9%
Winwick	866	130	15%

8.12 We have also carried out a comparison with the 2017 Preferred Development Options consultation, the results of which are set out in Table 14 below. Culcheth and Lymm, despite being by far the most sustainable locations for growth outside of the main Warrington urban area, are the only settlements to have their housing distribution figure reduced, with an increase proposed in the other 4 settlements. Culcheth's reduction is also significantly greater than that proposed in Lymm.

Table 14: Summary of WLP distribution towards the outlying settlements and comparison with the 2017 Preferred

Settlement	WLP 2019 distribution	WLP 2017 distribution	Change (%)
Burtonwood	160	150	+10 (+7%)
Croft	75	60	+15 (+25%)
Culcheth	200	300	-100 (-33%)
Hollins Green	90	40	+50 (+125%)
Lymm	430	500	-70 (-14%)
Winwick	130	90	+40 (+44%)
TOTAL	1,035	1,190	-155 (-13%)

8.13 There is nothing within the evidence base to, firstly, justify the reduction of housing proposed in Culcheth when compared to the 2017 version and secondly, why such a low level of housing growth

is appropriate for a settlement of this size that benefits from so many shops, services and access to key infrastructure.

- 8.14 The 200 homes proposed at the draft allocation on Warrington Road will not make the significant contribution towards affordable housing that is needed in Culcheth and other opportunities to contribute towards the improvement of existing or provision of new infrastructure will also be lost. The current position therefore cannot be considered to be justified in the context of a sound local plan housing strategy.
- 8.15 In the interests of planning for sustainable growth and in the context of the significant concerns in respect of the anticipated shortfall from other sources of housing land supply, Redrow's view is that a much higher level of housing growth should be directed towards Culcheth.

Quantifying the appropriate level of housing growth for Culcheth

- 8.16 As a starting point, the proportionate level of growth relative to size of Culcheth should at the very least be aligned with the level of growth proposed in the other outlying settlements. Putting Lymm aside, which also appears to have been unnecessarily constrained, the average level of growth proposed in Burtonwood, Croft, Hollins Green and Winwick is 15.5%. Applying this to Culcheth would result in a baseline housing target of 387 (15.5% growth in relation to the 2,495 existing households). Adjustments to deliver infrastructure, boost the delivery of affordable housing and making up the anticipated shortfall from other sources of housing land supply would then need to be applied to this figure.
- 8.17 Redrow's anticipated 5,513 shortfall from existing sources of housing land supply needs to be addressed through the identification of new housing allocations in the Green Belt. The baseline housing distribution figure of 387 proposed for Culcheth represents 2.04% of the 18,900 housing requirement for Warrington as a whole. Applying the same proportionate percentage to the anticipated 5,513 shortfall would see Culcheth delivering a further 113 dwellings; this then increases the distribution figure to 500. Again, this is simply an updated baseline figure based purely upon the size of the existing settlement and a realistic quantum of housing delivery from all sources of housing land supply during the plan period.
- 8.18 The Sustainability Appraisal (SA) recognises that 'incremental' housing growth in the outlying settlements will support local services and widen local housing choice without comprising their

character. Within the SA, Culcheth is mentioned in a number of key indicators as having the ability to accommodate a greater level of growth because of the role it plays supporting the day to day needs of residents, not only in Culcheth itself but also in nearby Croft and Hollins Green. An increased level of housing growth in a large settlement like Culcheth would therefore help to support the viability of existing community facilities, such as increasing school capacity and GP provision, whilst presenting the opportunity to secure new and improved facilities for a catchment area wider than the settlement itself.

- 8.19 Redrow's view is that the baseline figure of 500 should therefore be increased to capture the social and economic benefits that a critical mass of housing would deliver. A housing distribution of c. 650-750 homes could easily be (and should be) accommodated within Culcheth given the existing level of service provision and its elevated status providing for the day to day needs of smaller nearby settlements. This represents around a 25% increase in the size of the existing settlement, which in our view would still represent an 'incremental' level of growth maintaining the character of the existing settlement. The current WLP housing strategy endorses a 24% increase in the level of housing proposed at Hollins Green and so quite clearly this level of housing growth is considered to be appropriate in this respect.
- 8.20 This increased level of housing would also help to deliver a critical mass of much needed affordable housing in Culcheth. Again, as Culcheth is well served by shops and services and other key infrastructure, this represents a much more sustainable approach as residents of affordable homes would typically have lower levels of car ownership and so the ability to access key services providing for day to day needs by foot or other sustainable methods of travel becomes more critical.
- 8.21 Taking all factors in to account Redrow's view is that the housing distribution figure for Culcheth should be around 650-750 homes. This represents an appropriate and proportionate level of housing growth in what is the third largest settlement in Warrington in the settlement hierarchy.

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

- 8.22 It has been demonstrated that additional sites must be identified in Culcheth in order to deliver a more balanced housing strategy. Redrow has been promoting land to the west of Culcheth (referred to as Kirknall Farm by the Council) throughout the Local Plan process and the Masterplan and

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

8.23 With reference to the evidence base, the Development Options and Site Assessment Technical Report sets out the Council's rationale behind the selection of sites when considered against WLP objectives and alternative sites. For ease of reference, the Report concluded the following in respect of the Land West of Culcheth site:

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

However, when compared to the other two contender sites off Warrington Road (SHLAA Ref: 3157/ Site Ref: R18/P2/069) and (SHLAA Ref: 3337/ Site Ref: R18/P2/064) the site performs better (moderately as opposed to weak) in terms of its contribution to the functioning of the Green Belt and there is only a footway on one side of Wigshaw Lane for significant parts of its length with no opportunity for improvement.

Therefore, when compared to the other two sites off Warrington Road development of this site would perform the same in respect of objectives W1 (to strengthen existing neighbourhoods) and W6 (to minimise the impact of development on the environment) of the

draft Warrington Local Plan but would perform less well in respect of objective W2 (to facilitate the sensitive release of Green Belt) and W4 (to promote sustainable modes of transport)."

- 8.24 This is an extremely favourable assessment of the site and at a fundamental level it concludes that the site **accords with all Core Strategy objectives**, i.e. W1 to strengthen existing neighbourhoods; W2 to facilitate the sensitive release of Green Belt; W4 to provide new infrastructure to support Warrington's growth and W6 to minimise the impact of development on the environment. The only reason the site has not been selected is that whilst the Council quite clearly see the merits of delivering housing at this site, a subjective view has been taken that Land at Warrington Road scores better in respect of minimising Green Belt impact and promoting sustainable means of transport and the quantum of housing from this site is sufficient to meet the highly constrained housing target for Culcheth of 200 homes.
- 8.25 Having reviewed the Council's evidence base in respect of site selection, should the housing distribution figure increase in Culcheth (as Redrow have demonstrated it should), then this site has been identified as the most suitable alternative taking all other submitted sites in to consideration.
- 8.26 Notwithstanding, Redrow do question the conclusions that have been reached in respect of their site when compared to the proposed allocation at Warrington Road, i.e. that it performs less well in respect of Green Belt and promoting sustainable means of transport. These matters are now considered further.

Green Belt considerations

- 8.27 In respect of Green Belt, this site exhibits far greater levels of enclosure and was reassessed following the confirmation of the HS2 safeguarded route which runs adjacent to the southern/western boundary, which has the effect of completely enclosing the site. The reassessment was carried out in the Addendum to the GBA produced following the Regulation 18 Consultation (28 June 2017) and it 'downgrades' the contribution the site makes to the Green Belt from 'Strong' to 'Moderate'. No long distance views are available from either within or outside of the site and so any sense of a contribution towards openness is completely compromised by the existing residential development and the dense tree cover that follows the route of the Culcheth Linear Park, which is identified as a durable boundary in the 2016 Green Belt Assessment (assessment of Parcel CH15). In our opinion, the Warrington Road site exhibits far greater characteristics in respect of openness and the southern

boundary (as confirmed within the 2016 GBA; assessment of Parcel CH9) does not prevent further encroachment into the countryside. Despite this, for some reason the GBA conclusion was that this site makes a 'weak' contribution towards the Green Belt.

- 8.28 Redrow's firm view is that the land west of Culcheth makes far less of a contribution towards the purposes of including land within the Green Belt than the Warrington Road site and should be identified as a Housing Allocation regardless.

Promoting sustainable means of transport

- 8.29 Again, it is difficult to see how a conclusion has been reached that the Warrington Road site scores more favourably than the West of Culcheth site in respect of sustainable travel methods. The Warrington Road site is opposite Culcheth High School and Culcheth Community Primary School and this appears to be the only distinction between the two sites. Notwithstanding, the West of Culcheth site is just 1.6km from the High School, which is still within what is considered to be an accessible walking distance.
- 8.30 Aside from this, the West of Culcheth site is closer to the centre of Culcheth (650m) when compared to the Warrington Road site (800m). Also, reference is made within the Council's assessment that sections of Wigshaw Lane only has a footpath on one side and this is somehow seen to score against the West of Culcheth site in sustainability terms. What hasn't been acknowledged is that there is a continuous footpath along the entire eastern extent of Wigshaw Lane and that crossing points (with dropped kerbs) are provided at the roundabout junction of Wigshaw Lane with Pendle Gardens and Swinhoe Place, thus providing a safe, convenient and continuous footpath route in to the centre of Culcheth from the site.
- 8.31 Notwithstanding what are considered to be minor points in respect of the Green Belt and sustainable transport modes, given the amount of housing that needs to be delivered in Culcheth it is clear that both sites need to be identified as housing allocation in order to ensure that local housing and infrastructure needs are met.

Summary

- 8.32 It has been established within this representation that it is necessary to identify new Housing Allocations within the Green Belt as a result of the significantly overly-optimistic (and unjustified with

reference to the available evidence) housing land supply position being used to underpin the housing strategy for Warrington.

- 8.33 The site specific representation provided here at Appendix A provides a significant level of detail that entirely justifies the identification of Land West of Culcheth as a Housing Allocation in the WLP.
- 8.34 Redrow can confirm that the site is capable of delivering around **350-450 family homes** (including affordable housing) in Culcheth, helping to ensure that the WLP housing strategy meets housing needs in full and achieves an appropriate distribution of growth around the District of the type, size and mix required to meet the identified needs.
- 8.35 The evidence base underpinning the WLP has quite clearly identified this site as a suitable location for housing in respect of all Core Strategy objectives and so there are no fundamental issues identified that would automatically prevent this site from being identified as a Housing Allocation.

9 Suggested Site Allocation: Land at Warrington Road, east of Culcheth, Warrington

9.1 It is in the context of the analysis undertaken within this representation that Redrow are also promoting land at Warrington Road to the east of Culcheth as a suitable site for residential development. The site has previously been submitted as a Call for Sites submission by Redrow. The site extends to 2.83 hectares and has the capacity to accommodate c. 70 homes. The title plan of the land in question is provided at Appendix B of this representation.

Meeting Warrington's overall housing requirement and local housing needs in Culcheth

9.2 Section's 3 to 7 of this representation confirm the significant issues related to Warrington's existing sources of housing land supply, which result in the need to identify new Housing Allocations within the Green Belt to make up what is anticipated to be around a 5,500 shortfall during the plan period.

9.3 Section 8 then justifies a greater proportion of the overall housing requirement being directed towards Culcheth and that a target of around 650-750 dwellings is entirely appropriate given the size of the settlement, the wide range of shops, services and infrastructure, the need to make up the shortfall that Redrow consider exists from existing sources of housing land supply and the need to deliver affordable housing and improve/deliver key infrastructure.

9.4 It is within this context that the land at Warrington Road, east of Culcheth is being promoted by Redrow.

A Deliverable Site

9.5 Redrow can confirm that the site is available, suitable and achievable with a realistic prospect that housing will be delivered on the site within five years. It can therefore be considered 'deliverable' in accordance with the definition provided at Annex 2 of the NPPF (2019).

Available

9.6 Redrow are a long-established national volume housebuilder with an excellent track record of delivery. Redrow are promoting land at Warrington Road, east of Culcheth for residential development and this representation confirms that there is nothing to prevent the site from being

delivered immediately and housing completions being achieved within 5 years subject to receipt of the necessary planning consents.

- 9.7 Accordingly, it is confirmed that the site can be considered available for housing delivery within the early phases of the WLP plan period.

Suitable

- 9.8 The site is located 2km from the centre of Culcheth and just 1km from Culcheth High School and so a wide range of shops and services are located within an accessible distance of the site. Bus stops are located adjacent to the site providing regular daily services between Warrington and Leigh, which will give residents access to a far wider range of shopping, employment and leisure opportunities. This is therefore a highly sustainable and suitable location for new residential development to help meet locally identified needs for housing in Culcheth and Warrington as a whole.
- 9.9 From a Green Belt perspective, the site is already heavily influenced by the context of the surrounding residential development, with Hawthorn Avenue located to the immediate east, the recently constructed Culcheth Green site to the west and the properties along Fowley Common Lane to the north. The southern boundary is heavily vegetated and so this has the effect of significantly reducing the openness of this particular parcel of land and through enhancement will provide a natural and defensible barrier between the site and the open countryside.
- 9.10 The site is within a highly sustainable location and is only be considered to make a weak contribution towards the five purposes of including land within the Green Belt set out at paragraph 135 of the Framework and so can be considered appropriate for release for development. This is a therefore suitable location for new housing.

Achievable

- 9.11 Redrow can confirm that the development of the site for housing is achievable as there are no known physical or technical constraints that would prevent it from coming forward.

10 Suggested Site Allocation: Land south of Glazebrook Train Station

- 10.1 It is in the context of the analysis undertaken within this representation that Redrow are promoting land south of Glazebrook Train Station as a suitable site for residential development. The Call for Sites reference and description is R18/P2/021; Land west of Glazebrook Lane & Bank Street.
- 10.2 A detailed site specific representation and a Masterplan and Development Report prepared by Cass Associates on behalf of Redrow is provided at Appendix C and this clearly demonstrates that the site is appropriate for release from the Green Belt. The report also confirms that the site is available, suitable and achievable with a realistic prospect that housing will be delivered on the site within five years. It can therefore be considered 'deliverable' in accordance with the definition provided at Annex 2 of the NPPF (2019). The site is being promoted by Redrow, who are a major housebuilder with a proven and long-established track record of housing delivery in the northwest.
- 10.3 Redrow have identified a significant shortfall in respect of the Council's claimed housing land supply position, equating to a total of 5,513 dwellings. This needs to be accounted for through the identification of new Housing Allocations and this site is one such location, capable of delivering around **600 to 700 family homes**, which will go some way towards helping to meet this identified shortfall.
- 10.4 We now go on to provide the justification to direct additional housing growth towards Glazebrook.

Justification to identify a new Housing Allocation in Glazebrook and the opportunity presented by Glazebrook Train Station

- 10.5 The WLP sets out the exceptional circumstances that exist to justify the release of Green Belt land to meet housing needs and Redrow support the conclusion that has been reached. The WLP does not however seek to distribute any housing towards Glazebrook as part of the overall housing strategy. Redrow's view is that this represents a missed opportunity to achieve a truly sustainable pattern of growth, centred around Glazebrook train station which lies on the route of the Manchester Oxford Road to Liverpool Lime Street via Warrington Central service. In addition, the WLP only considers Glazebrook as an outlying settlement in isolation and so completely ignores the relationship with the nearby settlements of Cadishead and Irlam to the east in neighbouring Salford.
- 10.6 These matters are now given further consideration.

National and Local Planning Policy Sustainability Objectives

10.7 The land being promoted by Redrow represents a unique opportunity to deliver housing in a sustainable manner that is entirely aligned with recent national planning policy objectives and industry research. The opportunity and crucial role that key transport nodes, particularly train stations, play in meeting sustainability objectives has not been missed by the Greater Manchester Combined Authority when preparing the Greater Manchester Spatial Framework (GMSF), which is also currently under preparation. A local and relevant example is reflected within the 2019 Revised Draft Version of the GMSF, which identifies ‘North of Irlam Station’ as a Housing Allocation under Policy GM Allocation 32, considered capable of delivering around 1,200 homes. The following extract is taken from paragraph 11.189 of the 2019 GMSF and is the primary justification for identifying the site as a Housing Allocation:

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

10.8 Exactly the same principle applies to the land surrounding Glazebrook and the important role that the train station plays has already been recognised by Warrington when preparing previous versions of their development plan. The Masterplan and Development Report at Appendix C confirms that around 42 hectares of land to the south of Glazebrook Station was proposed to be Safeguarded for future development in the Deposit Draft of the Warrington Borough Local Plan produced in 1994. Given the significant scale of the land in question this was quite clearly a decision based upon the potential for the train station to support a sustainable pattern of growth in the future rather than Glazebrook’s position in the settlement hierarchy for Warrington. Ultimately the plan was not adopted as Warrington became a unitary authority prior to receiving the Inspector’s report in 1998 and so work on the plan was halted in June 1999. The intended policy to safeguard this land was not then carried forward simply because the new tier of regional planning guidance in the form of the Regional Spatial Strategy for the North west (RPG13) sought to direct growth towards the Regional centres of Liverpool and Manchester/Salford and as such there was no longer a requirement to carry out a review of the Green Belt in Warrington.

10.9 The NPPF is clear at paragraph 8 that in order to achieve sustainable development one of the fundamental objectives is to ensure that *‘sufficient land of the right types is available in the right*

places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.'

10.10 In respect of housing delivery, paragraph 72 of the NPPF recognises that planning for larger scale developments can be best achieved through larger scale development '*provided they are well located and designed, and supported by the necessary infrastructure and facilities*'. This is quite clearly the case in Glazebrook. Often, developments of a much larger scale are required to support the viability of delivering a major piece of new infrastructure such as a new train station, or even a line extension. In Glazebrook, this essential piece of infrastructure is already in place and not only that, it provides direct access in to the regional centres of Manchester and Liverpool and other nearby towns and employment destinations, most notably Warrington and Trafford Park.

10.11 When selecting locations that are considered suitable for larger scale development, paragraph 72 of the NPPF goes on to set out the following criteria that should be adhered to if housing needs are to be met in a sustainable way:

- a) *consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) *ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access*
- c) *set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;*
- d) *make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)³⁵; and*
- e) *consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.*

10.12 Development to the south of Glazebrook train station quite clearly meets these expectations. The planned infrastructure improvements that the 1,200 homes to the north of nearby Irlam Station will deliver, combined with those that this scheme could deliver will see a wide range of economic, social and environmental benefits delivered to the benefit of existing and future residents alike.

10.13 Numerous research papers have also been produced over the years that advocate the crucial role that train stations play in facilitating sustainable modes of travel and the distinct advantages that exist to locate new housing and development around them and this has manifested itself in the NPPF objectives outlined above.

10.14 These key planning policy objectives clearly support the principle of identifying land south of Glazebrook Train Station for new housing.

Further justification to identify land south of Glazebrook Train Station as a new Housing Allocation

10.15 The Masterplan and Development Report provided at Appendix C provides a detailed justification of the Site's inclusion as a Housing Allocation and should be referred to in this regard.

10.16 The Development Options and Site Assessment Technical Report sets out the Council's rationale behind the selection of sites when considered against WLP objectives. However, it is of concern that this site, which has been submitted through the Call for Sites exercise has simply not been considered as part of this process and so the reasons for discounting the site are unknown.

10.17 A development of 600 to 700 homes can be justified in this location as a result of the presence of Glazebrook Train Station and the site is also of a critical scale, which will assist in either the delivery of new infrastructure or supporting improvements to existing provision.

Delivering new infrastructure

Park and Ride Facility

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

transport modes and boost the use of the rail services available at Glazebrook in line with NPPF and WLP objectives.

Delivering Community and Commercial Uses

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

Summary

10.20 The site is available, suitable and achievable with a realistic prospect that housing will be delivered on the site within five years and represents a unique opportunity to deliver a truly sustainable development. The site is therefore 'deliverable' in accordance with the definition in Annex 2 of the NPPF (2019) and is being promoted by a major housebuilder with a proven track record of housing deliver in the northwest.

10.21 The development is centred around Glazebrook Train Station, which will provide residents with direct access to the wide range of employment, shopping, leisure and cultural opportunities available in Manchester, Liverpool, Warrington and Trafford Park. The development also offers the opportunity to significantly enhance the use of Glazebrook Train Station through the provision of a Park and Ride Facility, promoting sustainable methods of travel.

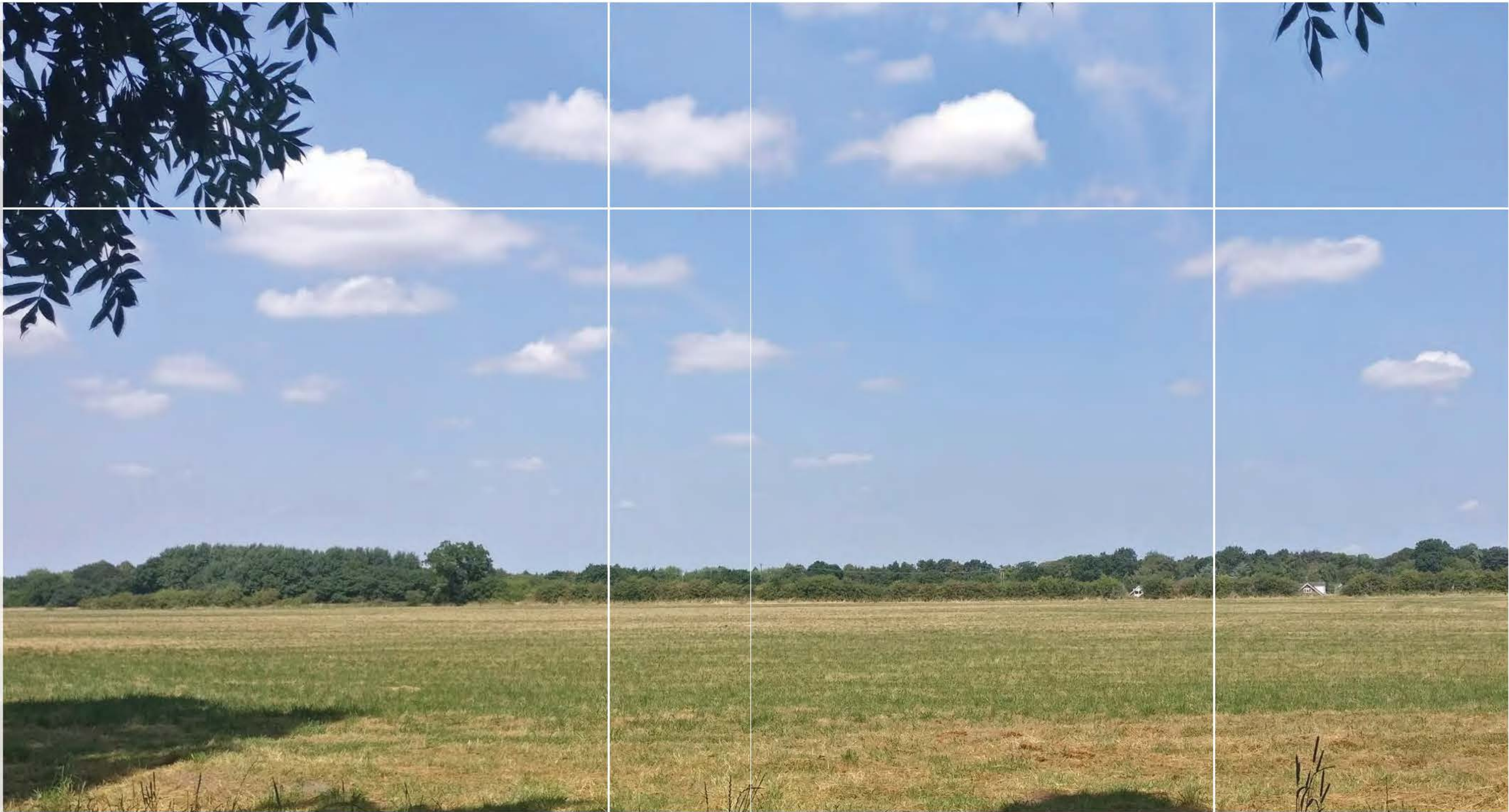
10.22 Redrow can confirm that the site is capable of delivering around 600-700 family homes (including affordable housing) in Glazebrook, helping to ensure that the WLP housing strategy meets housing needs in full and achieves an appropriate distribution of growth around the District of the type, size and mix required to meet the identified needs. Small scale commercial and community uses will also be integrated into the scheme and the inter-relationship with neighbouring Cadishead and Irlam further enhances the sustainability credentials of the site.

10.23 The Masterplan and Development Report provided at Appendix C provides a significant level of detail with regards to future development proposals for the site.

11 Conclusion

- 11.1 These representations are submitted on behalf of Redrow Homes Limited in relation to the Warrington Proposed Submission Version Local Plan 2017-2037 and supporting evidence base documents published by Warrington Council in March 2019.
- 11.2 Our representation confirms Redrow's concern that the Housing Strategy that is being pursued within the WLP is not sound in the context of paragraph 35 of the NPPF.
- 11.3 The housing requirement of 18,900 (just a 4% increase above the standard methodology) is considered to be a suppressed target in the context of Warrington's key strategic location and the Council's ambitious economic growth strategy.
- 11.4 An assessment of the various sources of housing land supply set out under Policy DEV1 has confirmed that the claimed quantum from these sources cannot be justified in consideration of past trends, infrastructure requirements and any other known constraints to delivery.
- 11.5 A review of the delivery and density assumptions applied to the Main Development Areas within the WLP confirms that the lead-in times and delivery rates are not realistic when considered in the context of research evidence, any associated infrastructure requirements and the evidence from comparable local examples.
- 11.6 Our assessment of the Housing Strategy has confirmed that a shortfall of 5,513 dwellings will exist in relation to the various claimed sources of housing land supply set out under Policy DEV1 and so additional sites are required to be identified in order to ensure that housing needs (both market and affordable) are met in full during the plan period. Areas of safeguarded land also need to be identified and a trigger mechanism for future Local Plan Reviews based upon the actual rate of housing delivery should also be introduced, in order that additional sites can be released earlier during the plan period.
- 11.7 Given the need to identify new Housing Allocations across the Borough, the three sites promoted by Redrow are confirmed to be available, suitable and therefore deliverable in the context of Annex 2 of the NPPF and should therefore be identified as Housing Allocations in the WLP.

Appendix A: Masterplan and Development Report for Land West of Culcheth



**Land West of Culcheth,
Warrington**

Masterplan and Development Report
September 2018

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1 Introduction

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

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

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

The Warrington Context

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

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

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


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

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

Figure 1 - Context Plan: Aerial Photograph



LEGEND

 Gross Site Boundary
Area = 18.86 ha / 46.60 ac

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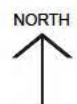
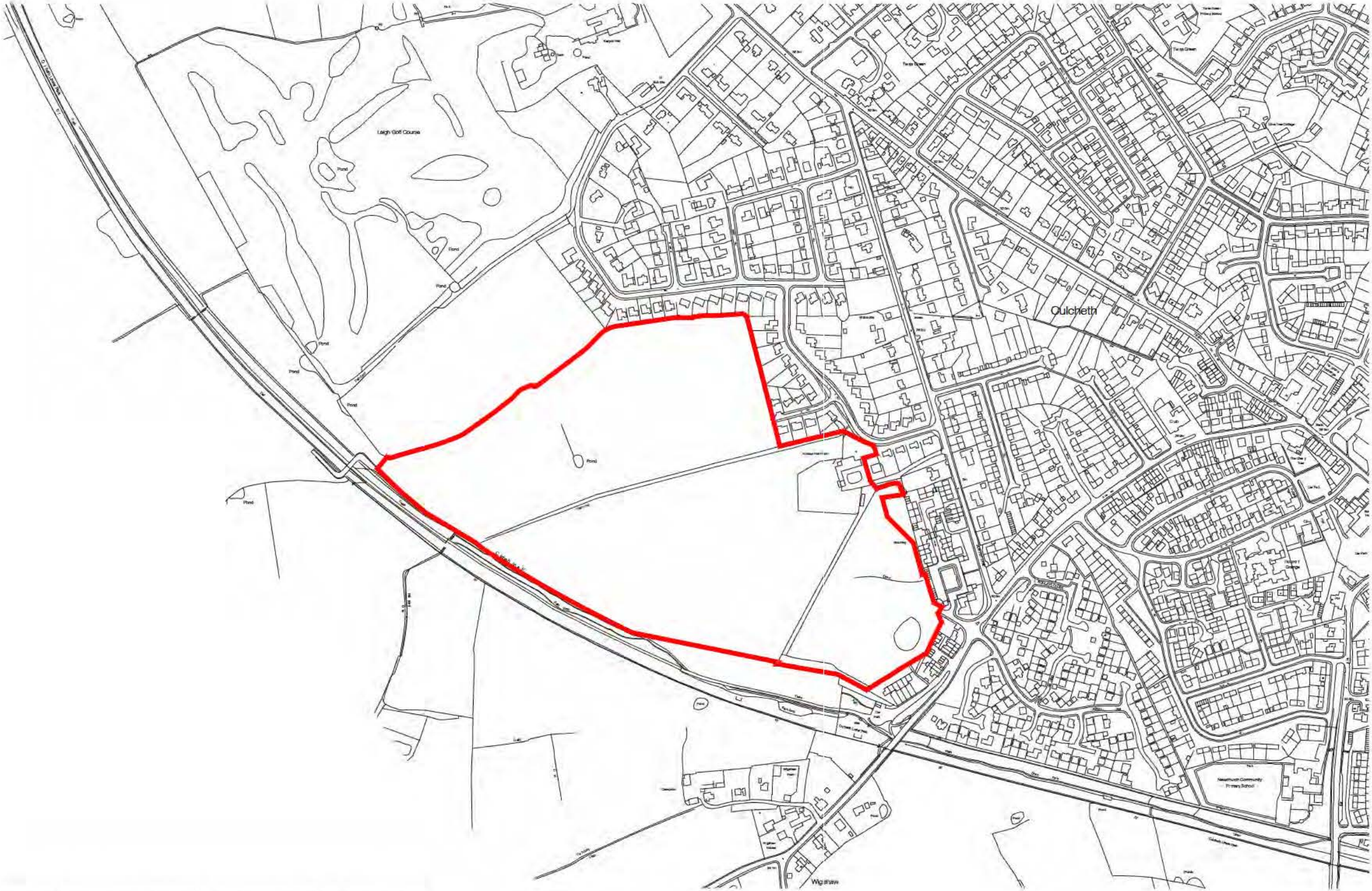


Figure 2 - Context Plan: Ordnance Survey Base



LEGEND
Gross Site Boundary
Area = 18.86 ha / 46.60 ac

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Figure 3 - Panoramic Photographs



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



View north of the existing central hedgerow



View east from south west corner of the site



View north east showing the properties on Brookfield Road

2 The Site and it's Context

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

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

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

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

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



Culcheth Linear Park



Kirknall- Hall Farm

Figure 4 - Site Analysis

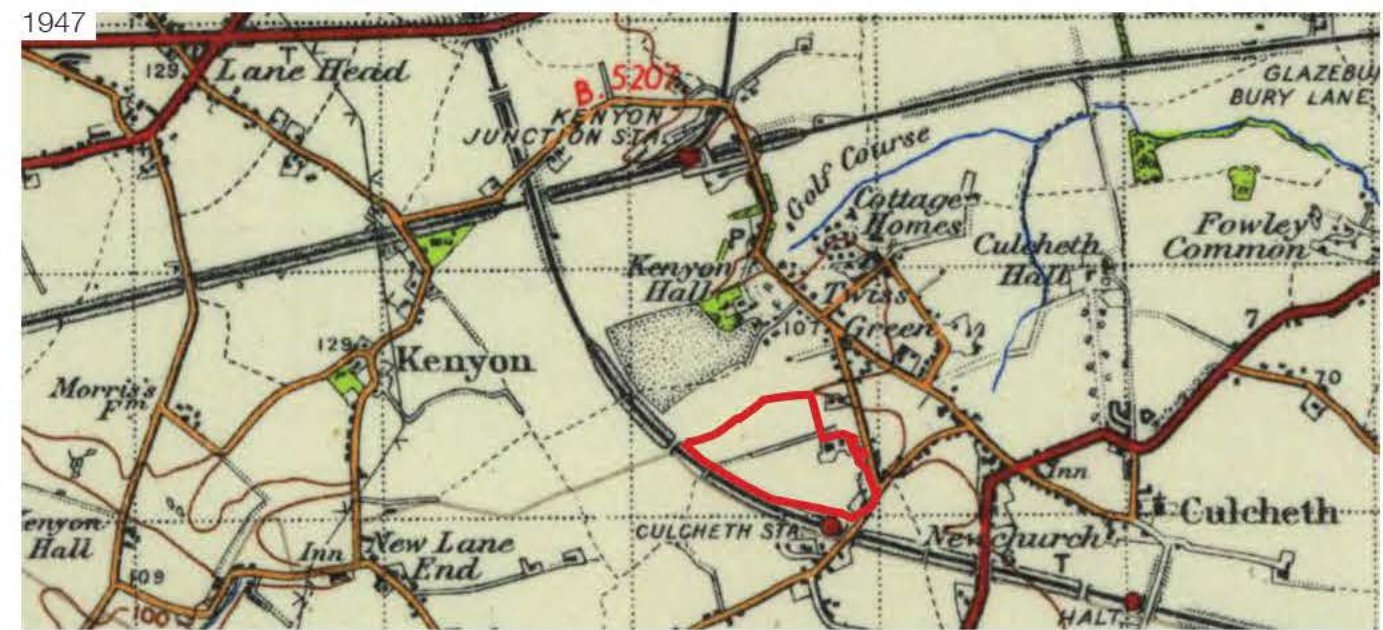
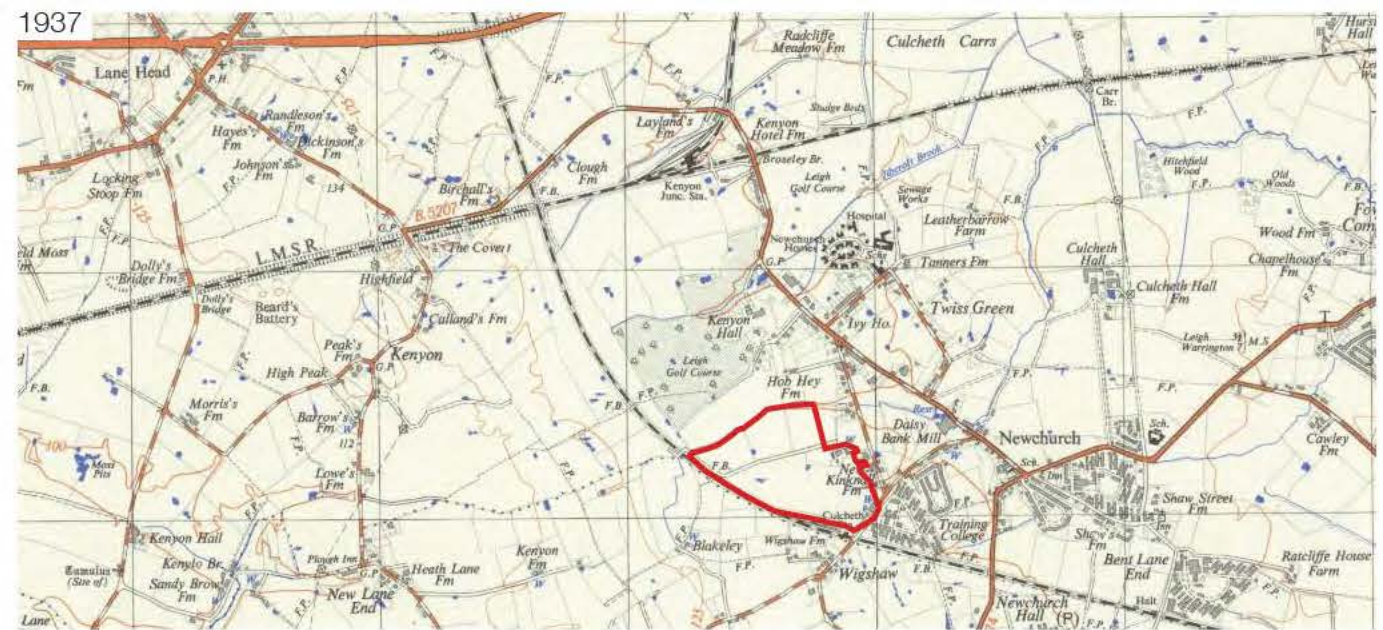
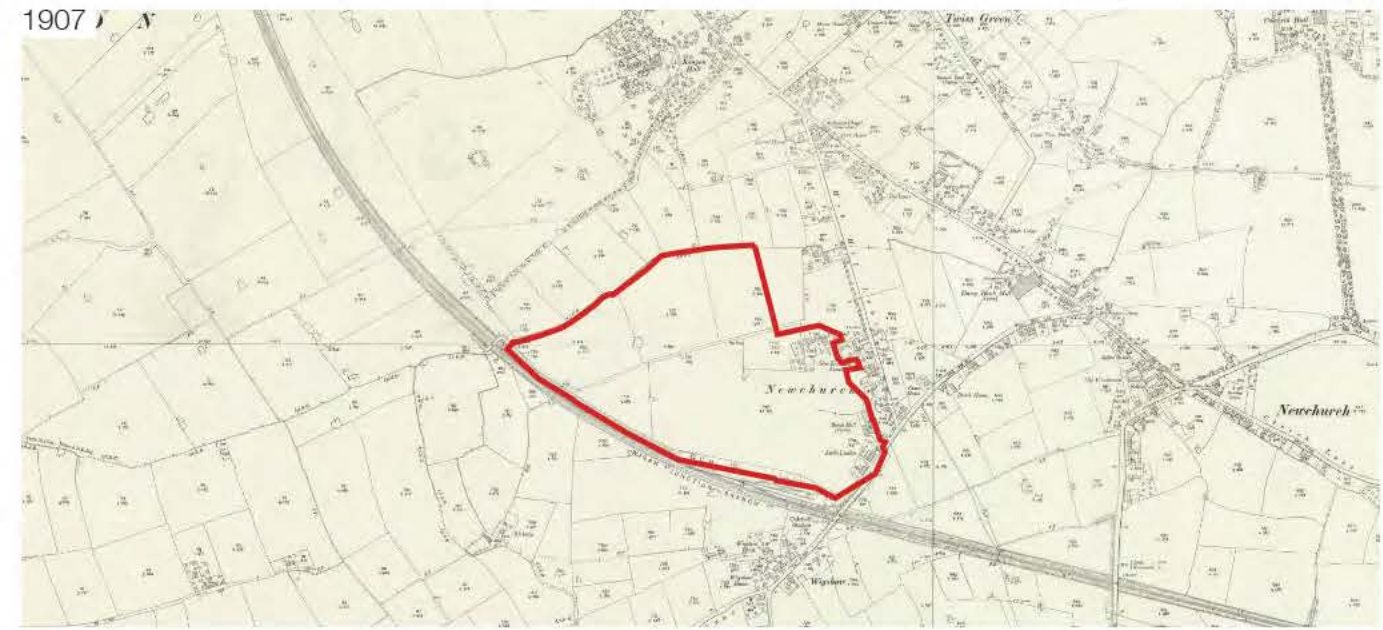


- LEGEND**
- Gross Site Boundary
Area = 18.86 ha / 46.60 ac
 - Potential Development
Area = 14.53 ha / 35.90 ac
 - ← Potential Development Primary Access Point
 - ← Potential Development Secondary Access Point
 - ← Potential Development Pedestrian Access Point
 - Existing Woodland And Trees
 - Existing Waterbody
 - Existing Field Drain
 - Existing Public Surface Water Sewer (9m Easement)
 - Existing Public Right Of Way
 - Permitted Pedestrian Route
 - A Road
 - B Road
 - 40 5m Contour

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Figure 5 - Historic Plans



3 Planning Policy Context

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

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

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

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

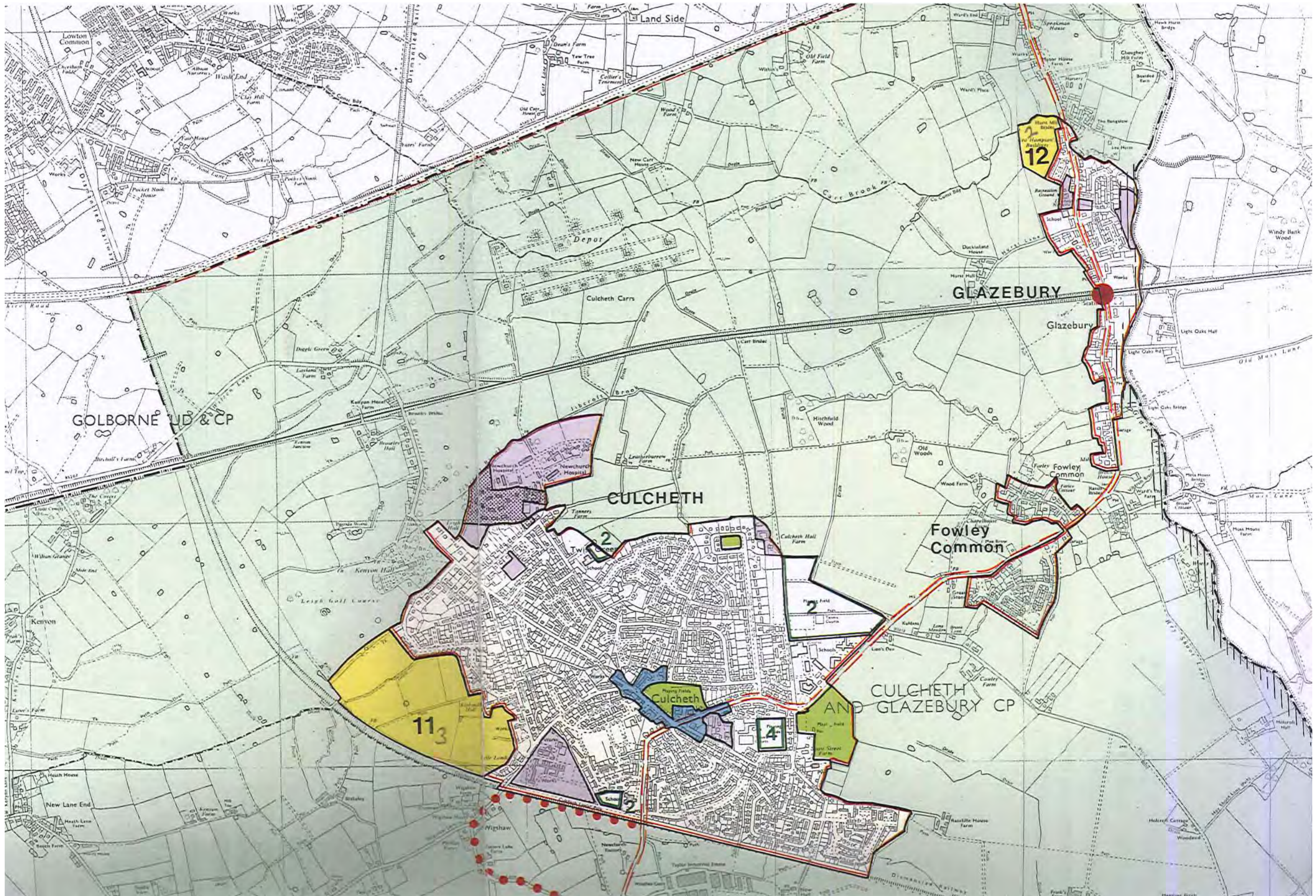
- An assessment of the implications for the character of the settlement
- The permanence of the amended green belt boundary
- Transport impacts

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

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

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

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



4 The Proposed Development

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

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

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

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

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

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

The indicative land areas are:

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

Figure 7 - Development Masterplan



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Figure 8 - Kirknall Hall Farm



5 Accessibility and Sustainability

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

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

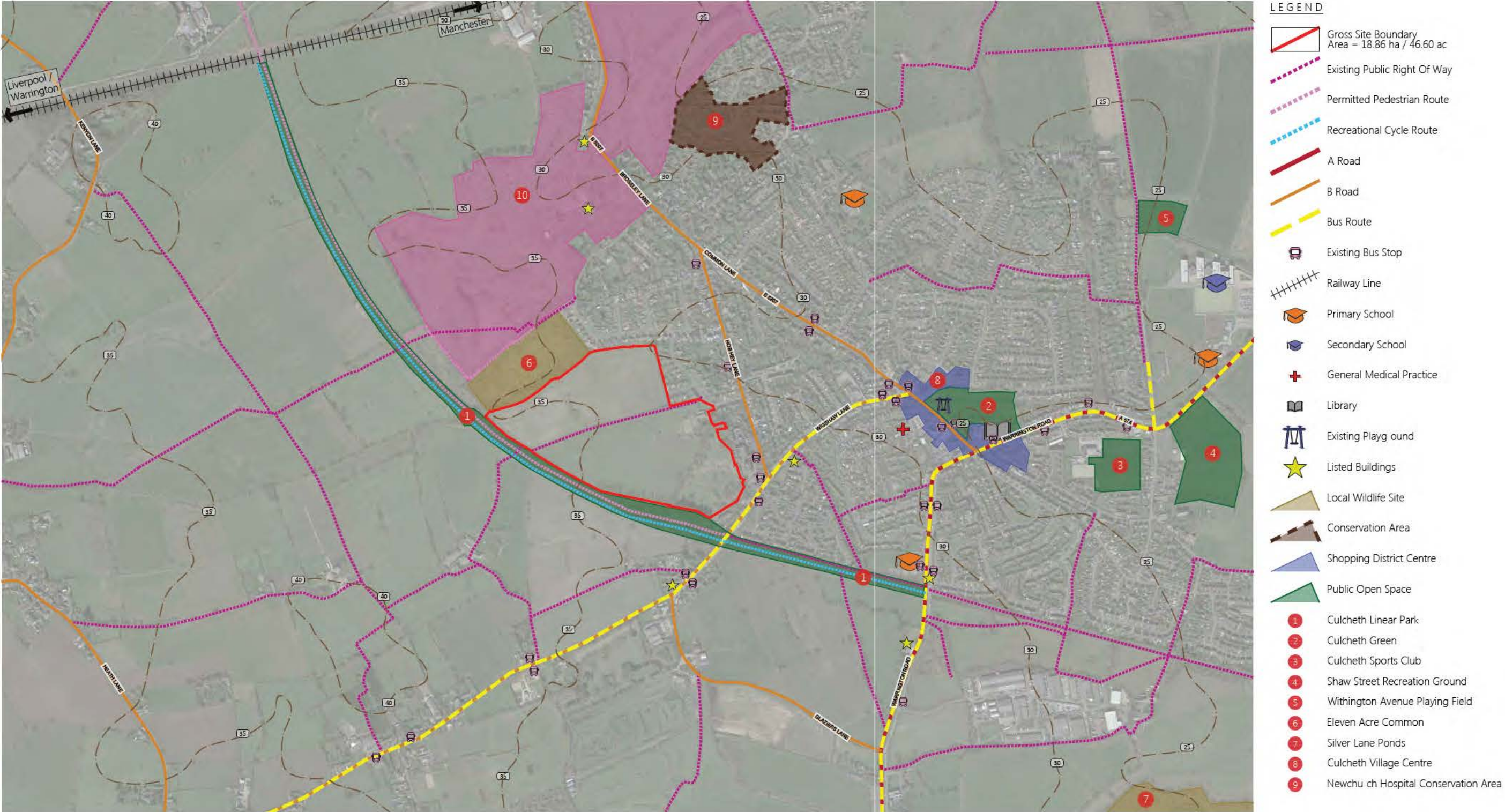
An appraisal of the context of the land and connections shows that there is the potential to develop good quality, safe and commodious links between the new housing and everyday services and facilities [Figure 9 and 10].

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

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

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

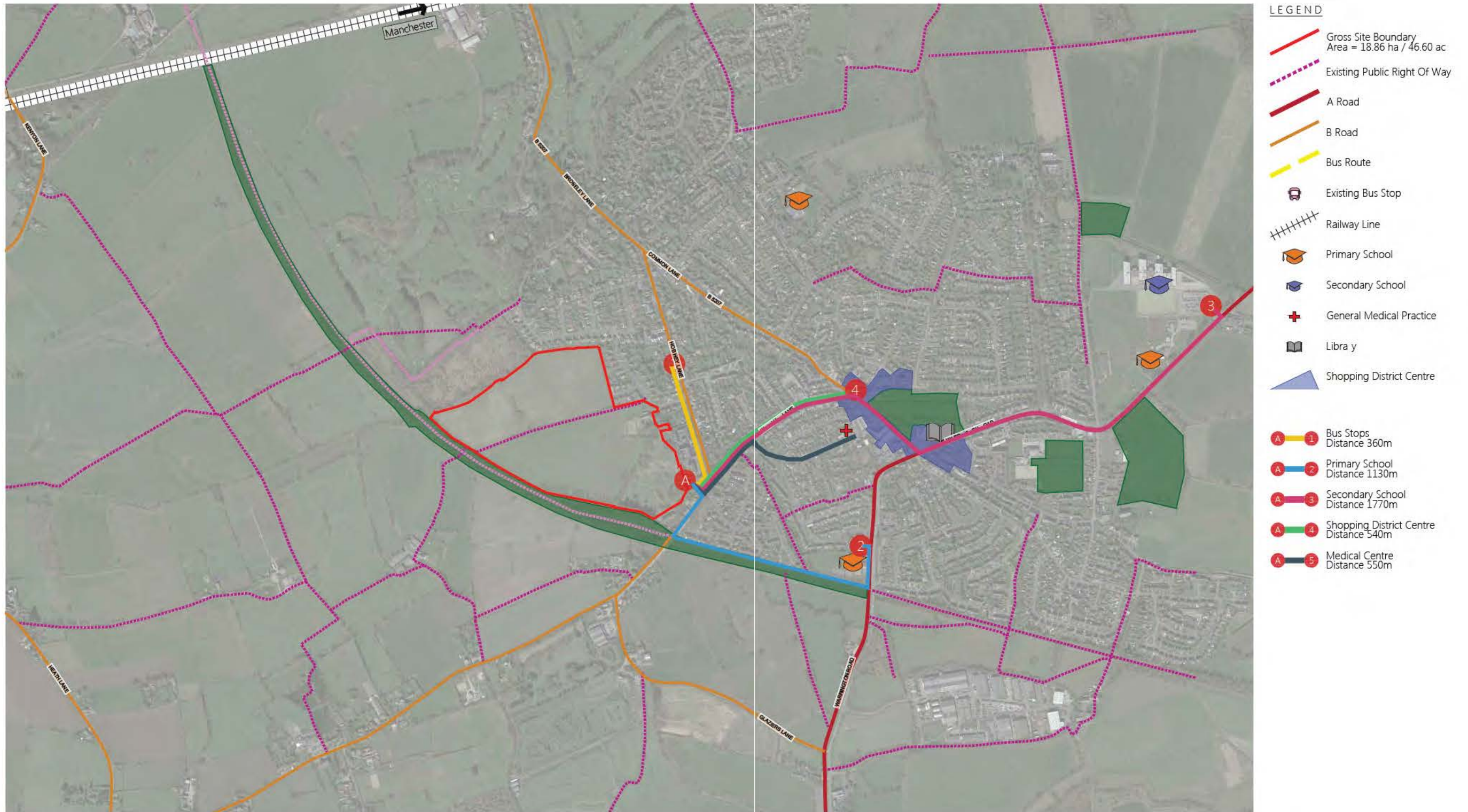
Figure 9 - Context, Connectivity, Services and Facilities



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Figure 10 - Routes to Local Facilities and Services



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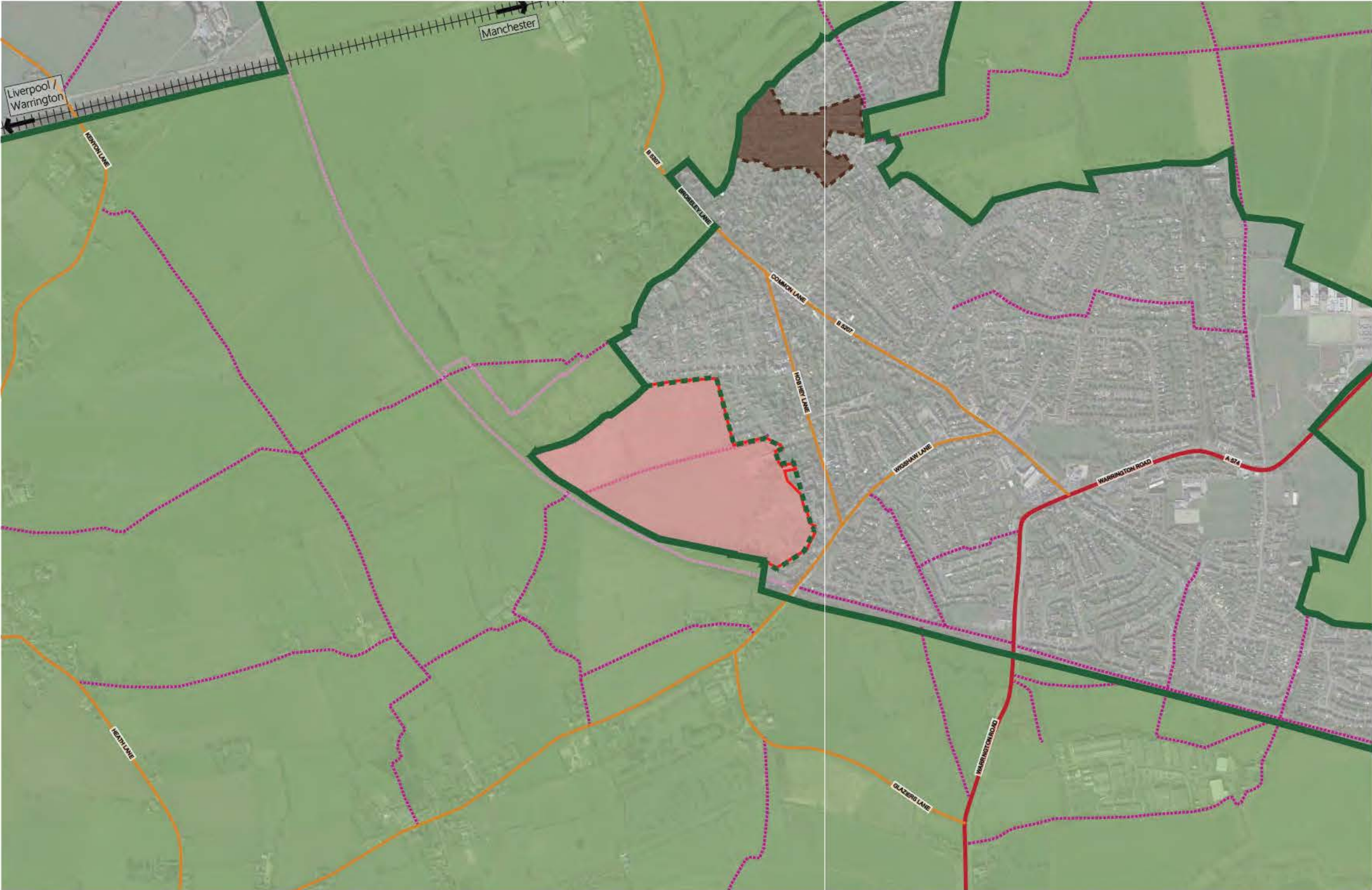
6 The Green Belt

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

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

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

Figure 11 - Revised Green Belt Boundary



- LEGEND**
- Gross Site Boundary
Area = 18.86 ha / 46.60 ac
 - - - Existing Public Right Of Way
 - - - Permitted Pedestrian Route
 - A Road
 - B Road
 - + + + Railway Line
 - - - Proposed Greenbelt
 - Existing Greenbelt
 - - - Conservation Area

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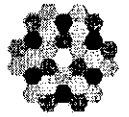
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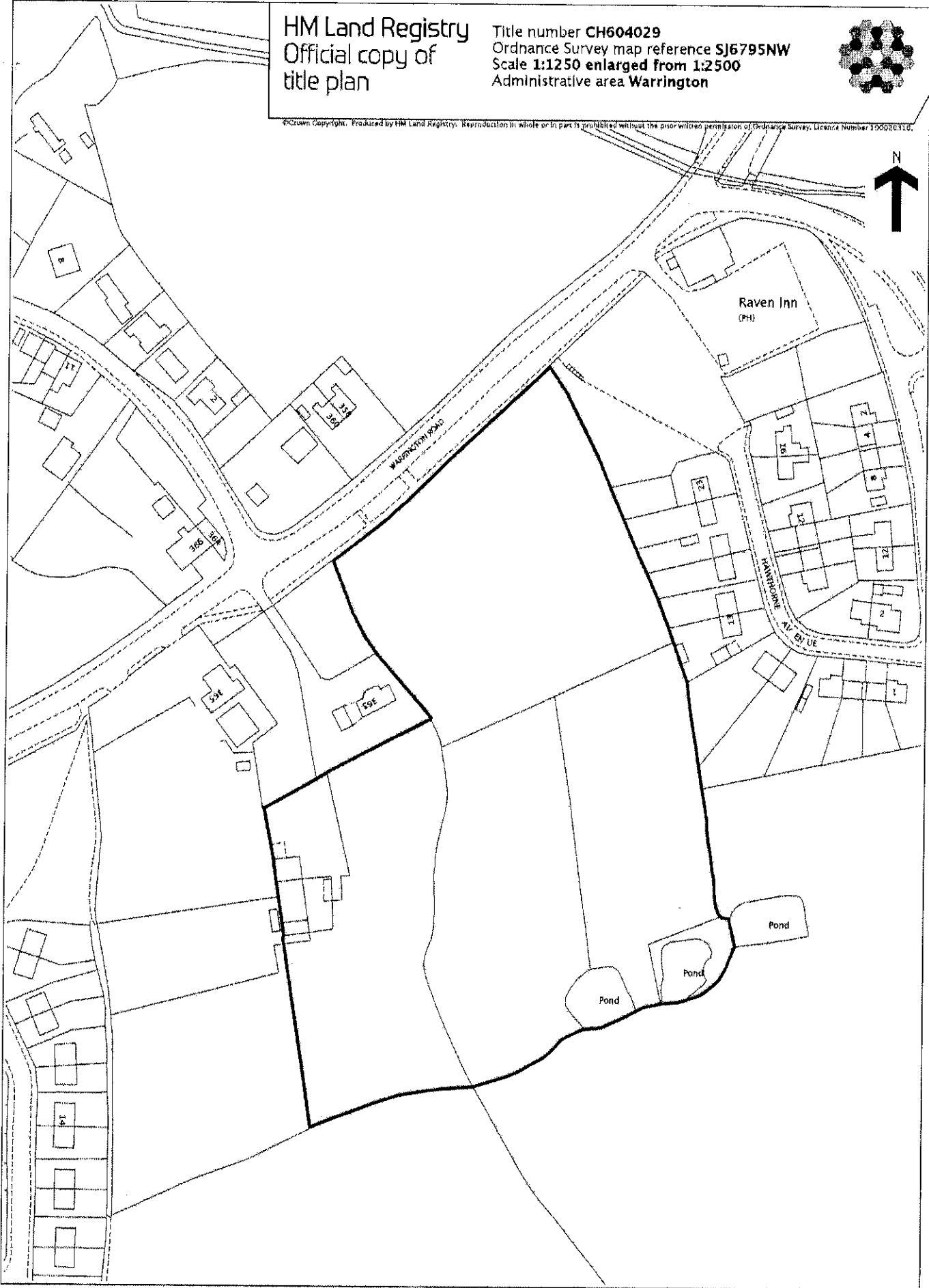
Appendix B: Title Plan for Land at Warrington Road, east of Culcheth

HM Land Registry
Official copy of
title plan

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



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Appendix C: Masterplan and Development Report for Land south of Glazebrook Train Station



Land at Glazebrook, Warrington

Masterplan and Development Report

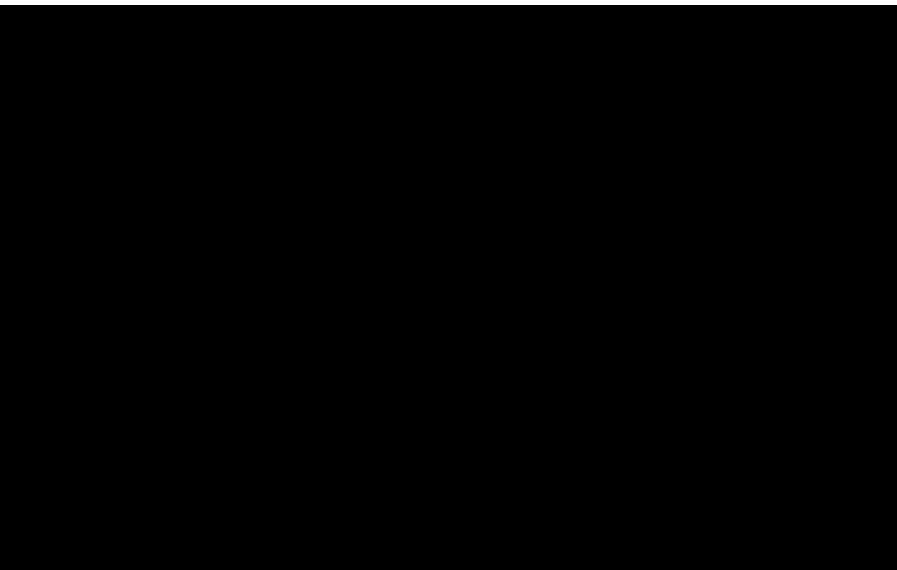
August 2018

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1 Introduction

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

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

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

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

The Warrington Context


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

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

Figure 1: Context - Aerial Photograph



LEGEND

 Gross Site Boundary
Area = 31.81ha / 78.60 ac

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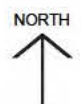


Figure 2 - Context: Ordnance Survey Base



LEGEND
Gross Site Boundary
Area = 31.81ha / 78.60 ac

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Figure 3 - Site Photographs



View north from Bank Street.



View South down Vetch Close



Existing Cottages adjacent to the Railway Station



View of former Military Camp



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



2 The Site and it's Context

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

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

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

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

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

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



From Bank Street towards Glazebrook rail station



Former military camp

Figure 4 - Site Analysis

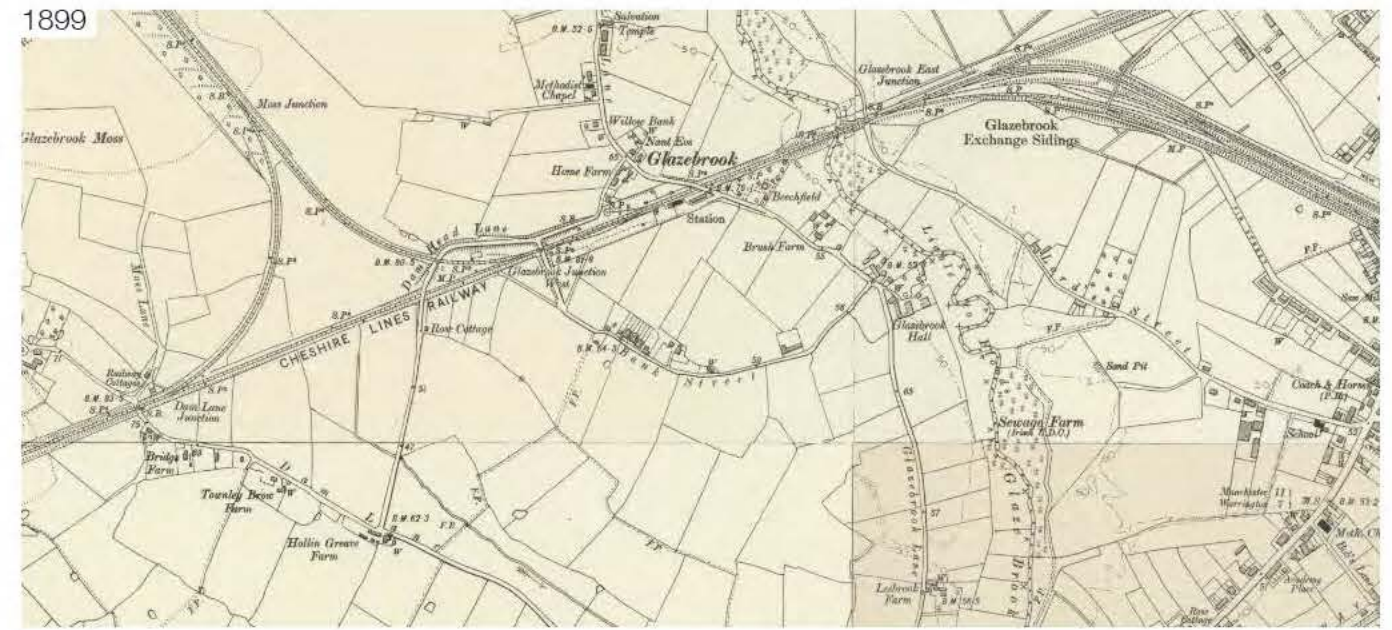
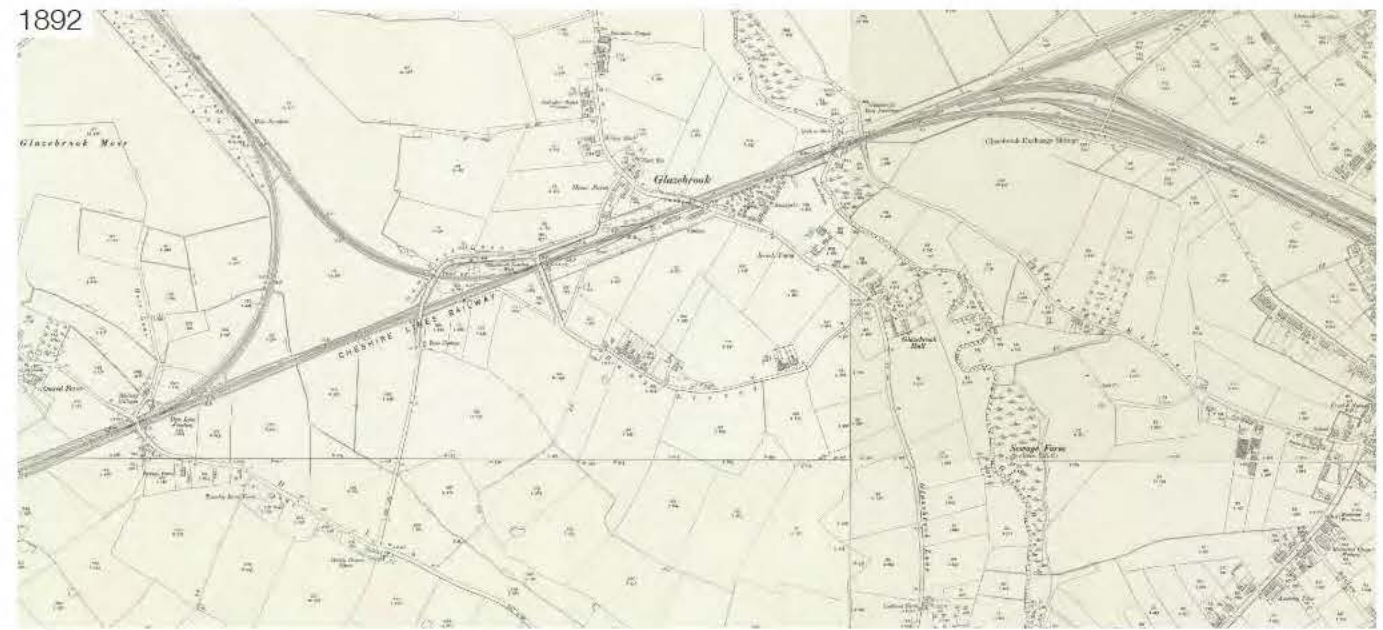


- LEGEND**
- Gross Site Boundary
Area = 31.81ha / 78.60 ac
 - Administrative Boundary
 - Existing Woodland And Trees
 - Existing Waterbody
 - Existing Public Right Of Way
 - Railway Line
 - ⊘ Railway Station
 - A Road
 - B Road
 - 40 5m Contour
 - Gradient
 - Existing Bridge
 - ★ Listed Building

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Figure 5 - Historic Plans



3 Planning Policy Context

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

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

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

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

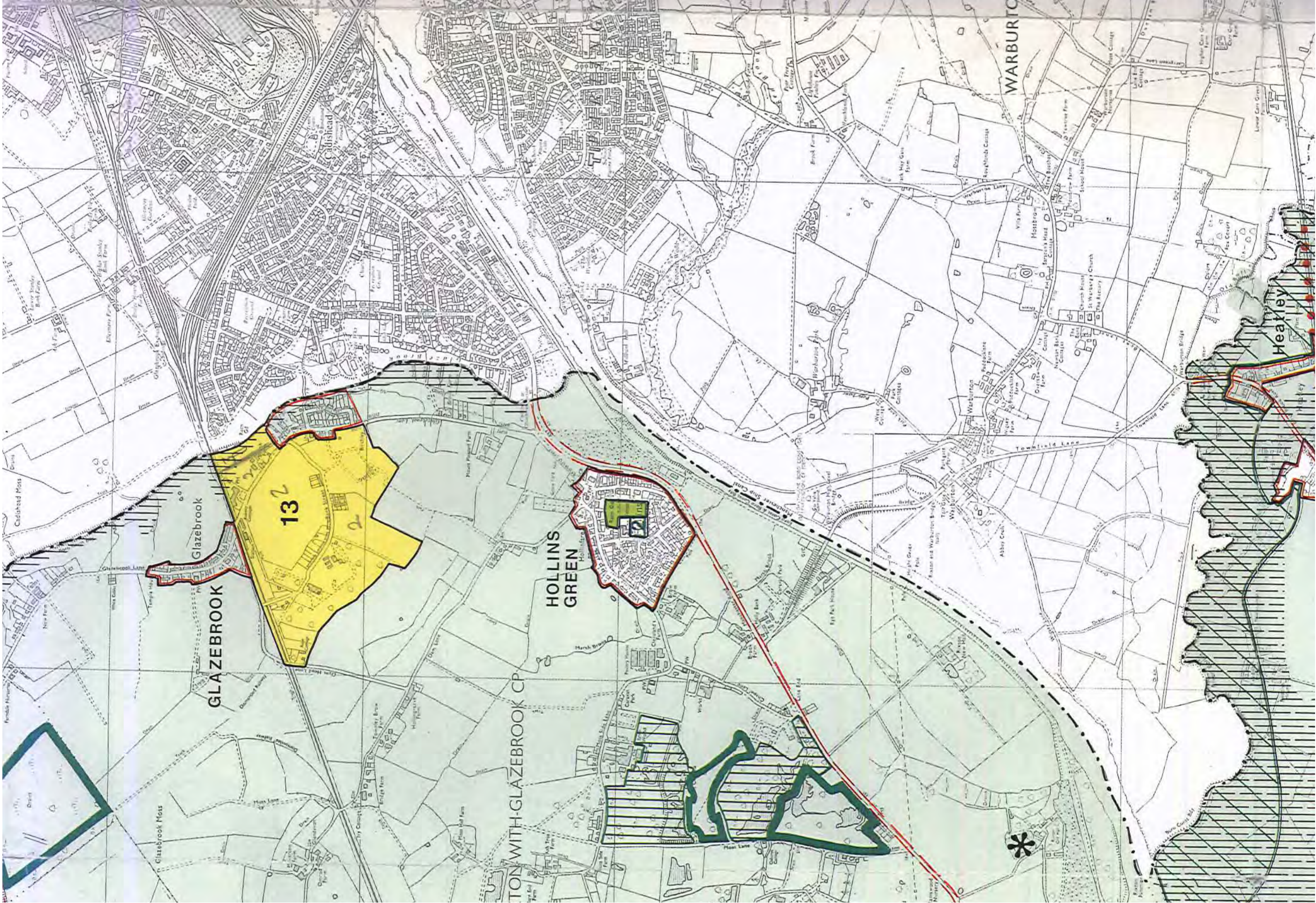
- An assessment of the implications for the character of the settlement
- The permanence of the amended green belt boundary
- Transport impacts

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

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

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

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



4 The Proposed Development

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

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

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

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

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

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

Gross Site Area: 31.81 ha

Housing Net Area : 23.14 ha

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

Potential Housing: 600 to 700 Houses



Bank Street



Glazebrook Rail Station

Figure 7 - Development Masterplan



- LEGEND**
- Gross Site Boundary
Area = 31.81ha / 78.60 ac
 - Existing Woodland And Trees
 - Existing Waterbody
 - Existing Field Drain
 - - - Existing Public Right Of Way
 - A Road
 - B Road
 - Potential Development Primary Access Point
 - Potential Development Secondary Access Point
 - Potential Park & Ride Access Point
 - Key Pedestrian Link
 - 5m Contour
 - Potential Housing Area
 - Potential Commercial Area
 - Potential Road Network
 - Potential Park and Ride

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Figure 8 - Park and Ride Layout



5 Accessibility and Sustainability

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

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



Glazebrook rail station concourse



Glazebrook Post Office

Figure 9 - Context, Connectivity, Services and Facilities

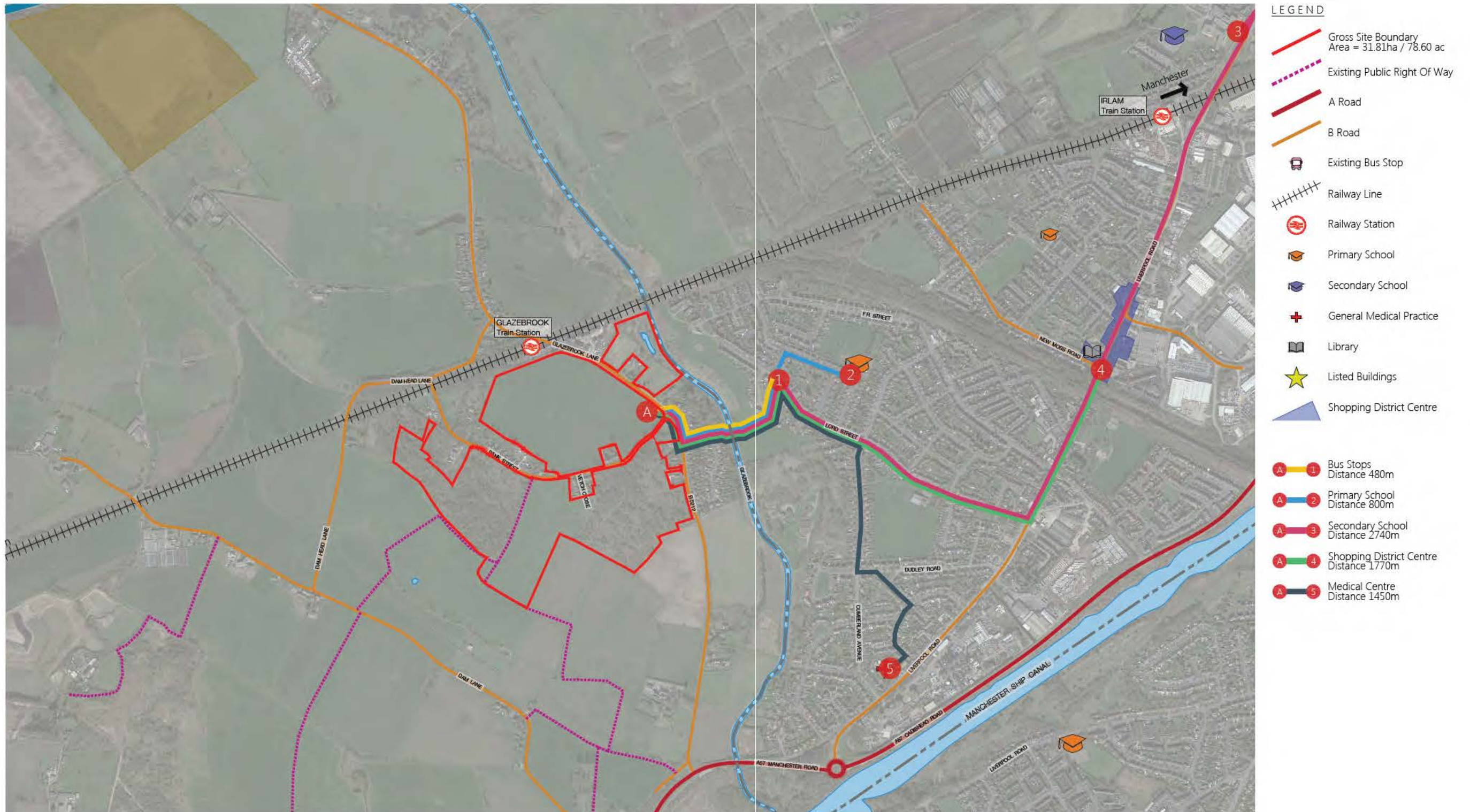


- LEGEND**
- Gross Site Boundary
Area = 31.81ha / 78.60 ac
 - Administrative Boundary
 - - - Existing Public Right Of Way
 - - - Permitted Pedestrian Route
 - Motorway
 - A Road
 - B Road
 - Bus Route
 - Existing Bus Stop
 - Railway Line
 - Railway Station
 - Primary School
 - Secondary School
 - + General Medical Practice
 - Existing Playground
 - ★ Listed Buildings
 - ▲ Site of Special Scientific Interest
 - ▲ Shopping District Centre
 - ▲ Public Open Space
 - 1 Glazebrook Lane Open Space
 - 2 Lord Street Recreation Ground
 - 3 St Mary's Recreation Ground
 - 4 Cardishead Recreation Ground
 - 5 Rowson Drive Playing Fields
 - 6 Allotment Road Park
 - 7 Cardishead Park
 - 8 Holcroft Moss SSSI
 - 9 Cardishead Retail Centre

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Figure 10 - Routes to Local Facilities and Services



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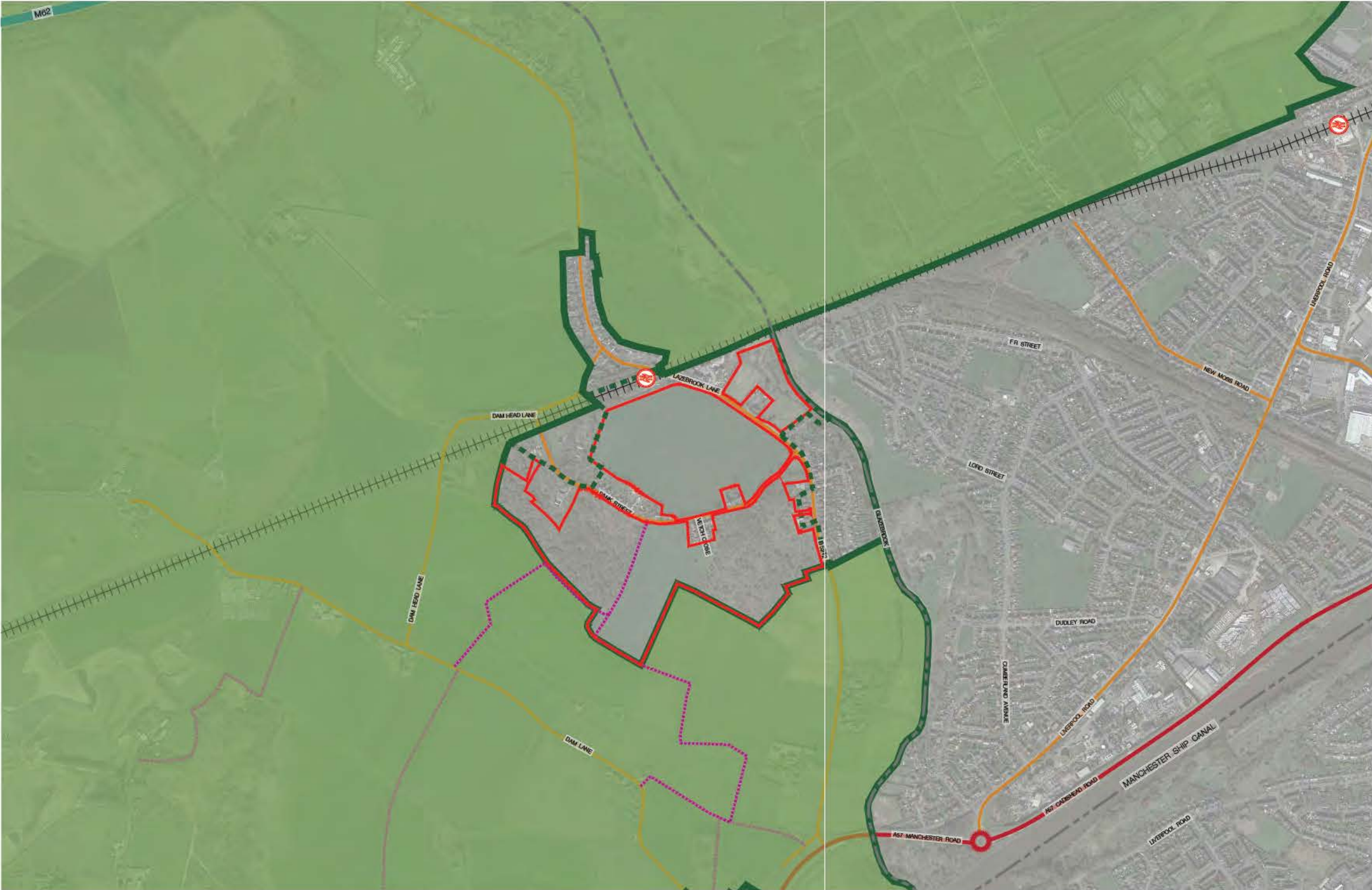
6 The Green Belt

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

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

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

Figure 11 - Planning Policy Context



- LEGEND**
- Gross Site Boundary
Area = 31.81ha / 78.60 ac
 - Administrative Boundary
 - - - Existing Public Right Of Way
 - A Road
 - B Road
 - - - Railway Line
 - ⊙ Railway Station
 - - - Existing Greenbelt
 - Proposed Greenbelt

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8 Conclusion

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

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

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

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

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

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

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

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