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WARRINGTON
Borough Council

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Warrington Borough Council

Local Plan

Preferred Development Option

Regulation 18 Consultation

Standard Response Form

July 2017

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2: Questions

Question 1

Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

Response:

Please see sections 3 and 4 of the accompanying representations report submitted by Peel Holdings (Management) Ltd.

Question 2

Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?

Response:

Please see sections 3 and 4 of the accompanying representations report submitted by Peel Holdings (Management) Ltd.

Question 3

Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

Response:

Please see sections 3 and 4 of the accompanying representations report submitted by Peel Holdings (Management) Ltd.

Question 4

Do you agree with the new Local Plan Objectives?

Response:

Please see sections 5 and 6 of the accompanying representations report submitted by Peel Holdings (Management) Ltd.

Question 5

Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

Response:

Please see sections 5, 6, 7 and 8 of the accompanying representations report submitted by Peel Holdings (Management) Ltd.

Question 6

Do you have any comments to make about how we've assessed different options for the main development locations?

Response:

Please see section 2 of the accompanying representations report submitted by Peel Holdings (Management) Ltd.

Question 7

Do you agree with our Preferred Development Option for meeting Warrington's future development needs?

Response:

Please see accompanying representation report submitted by Peel Holdings (Management) Ltd.

Question 8

Do you have any comments to make about our Preferred Development Option for the City Centre?

Response:

No comments at this stage.

Question 9

Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?

Response:

No comments at this stage.

Question 10

Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?

Response:

Please see section 2 of the accompanying representations report submitted by Peel Holdings (Management) Ltd.

Question 11

Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?

Response:

Please see section 2 of the accompanying representations report submitted by Peel Holdings (Management) Ltd.

Question 12

Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

Response:

Please see section 2 of the accompanying representations report submitted by Peel Holdings (Management) Ltd.

Question 13

Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

Response:

Please see sections 1 - 9 of the accompanying representations report submitted by Peel Holdings (Management) Ltd.

Question 14

Do you agree with our approach to providing new employment land?

Response:

Please see sections 2, 4 and 9 of the accompanying representations report submitted by Peel Holdings (Management) Ltd.

Question 15

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?

Response:

No comments at this stage.

Question 16

Do you agree with our suggested approach for dealing with Minerals and Waste?

Response:

No comments at this stage.

Question 17

Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?

Response:

Please see sections 8 and 9 of the accompanying representations report submitted by Peel Holdings (Management) Ltd.

Representations to Warrington Local Plan Preferred Development Option Regulation 18 Consultation

Peel Holdings (Management) Ltd

September 2017



Turley

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██████████
Client

Peel Holdings (Management) Ltd

Our reference

PEEM3056

September 2017

Executive Summary

This report provides Peel Holdings (Management) Ltd's ("Peel") comments on the Warrington Local Plan Preferred Development Option Regulation 18 Consultation ("PDO consultation").

Comments are provided in the context of Peel's significant and diverse land and development interests in Warrington, including:

- Sites within the Warrington Waterfront proposed development area (including Port Warrington and expansion land and land at Arpley Meadows);
- Land within the Warrington South West Extension proposed development area;
- Major greenfield and Green Belt sites with significant residential development potential across the wider Borough;
- Various smaller sites within the urban area and outside of the urban area with mixed use development potential;

Peel submitted extensive comments to Warrington Borough Council on the Regulation 18 Consultation Scope and Contents Document in December 2016. These further representations build on these comments in the context of a more clearly expressed spatial strategy for the future growth of the Borough as provided by the PDO document.

Preferred Option – general comments

Peel welcomes the progression of the Warrington Local Plan. The realisation of the Warrington New City aspiration sits at the heart of this and underpins the spatial strategy and growth ambitions set out. Warrington New City is about the town realising its full potential; its transformation from a New Town into a New City at the heart of the Northern Powerhouse, capitalising on its strategic position between Manchester and Liverpool and at the intersection of four major economic growth and development corridors of national importance:

- The M62 Corridor;
- The M56 / A55 Corridor;
- The Manchester Ship Canal Corridor; and
- The M6 / HS2 Corridor.

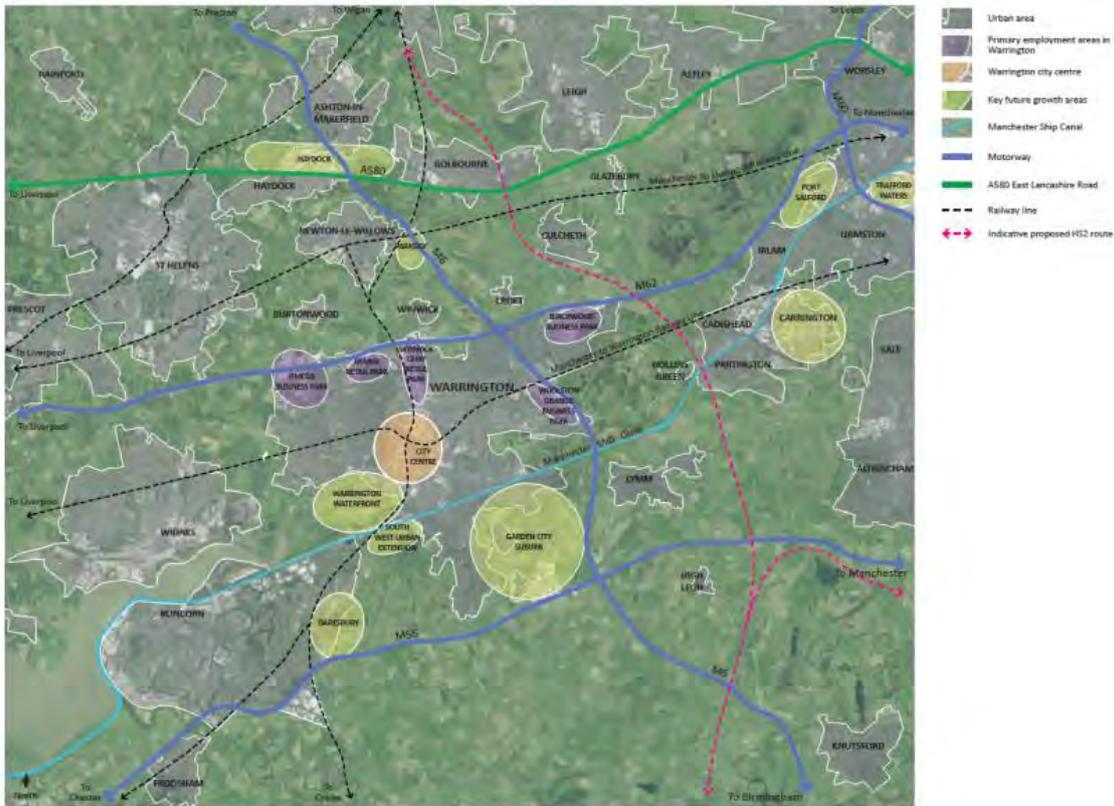


Figure 1: Warrington Strategic Context

New City seeks a sustainable future for Warrington with a focus on new and improved infrastructure; delivering the homes which Warrington needs; increasing and diversifying employment and making Warrington more resilient in the face of future economic and environmental challenges. It encapsulates economic, social and environmental dimensions. 'Quality of place' runs through this vision.¹

The Council has undertaken an appraisal of all options for realising the New City aspiration. It has identified a series of key development sites which will unlock Warrington's potential being drivers of growth in their own right whilst having the ability to address existing and longstanding infrastructure constraints which are holding Warrington back. These sites are strategically located and build on existing infrastructure assets (such as the Manchester Ship Canal) and future planned infrastructure (such as the Western Link) which are key to Warrington's future growth. Peel recognises the significant benefits that will be realised through the focus on the five main development areas: Warrington Town Centre; the wider urban area; Warrington Waterfront; Warrington Garden City Suburb and the South West Warrington Urban Extension in delivering New City.

Peel has a number of major land interests within these locations and is committed to bringing these forward through the Local Plan. Peel is fully supportive of the Council's proposals for these locations as set out in the PDO. Peel recognises that significant infrastructure investment is needed to realise these development opportunities and is fully supportive of the emerging

¹ Warrington Means Business – Warrington's Economic Growth and Regeneration Programme (Warrington & Co 2017)

proposals for the delivery of the Western Link Road connecting the A56 and the A57. As a significant land owner in this area, Peel is committed to working with the Council to deliver this critical infrastructure.

Peel welcomes the Council's recognition of the development potential of Port Warrington to deliver an increase in the Borough and region's multi-modal freight and logistics capacity and to secure significant employment and economic benefits. This allocation reflects that the Local Plan is seeking to respond to strategic opportunities which the Borough presents, as encouraged by NPPF and the National Policy Statement for Ports (January 2012). The expansion of Port Warrington is a key part of the Mersey Ports Masterplan developed by Peel Ports and forms one of a number of strategic port investments to promote the more sustainable transport of goods across the region and which capitalise on the demand for increased logistics and freight infrastructure in the context of growth and expansion of the Port of Liverpool.

More generally, the proposed allocations outlined in the PDO document provide a mix of residential, commercial and employment development proposals. They respond to the inherent opportunities presented by these sites to drive the growth of the Borough in the context of their strategic location. The proposed extensions to the urban area will collectively provide a critical mass of development in a single broad spatial area to secure the infrastructure needed to unlock the town centre and waterfront and facilitate their development and regeneration. The scale of opportunities here can deliver genuine change and will provide the opportunity to create liveable places which embrace and contribute to the Garden City concept as a key principle of New City.

Peel supports the Council's proposal to deliver a level of housing above the Objectively Assessed Need and considers this to be critical to the realisation of New City as a policy stimulant to the growth of the Borough. Peel agrees that this presents Exceptional Circumstances to justify the release of land from the Green Belt in the context of the Borough's urban land supply. It is noted that the Council has sought to maximise development within the urban area in order to arrive at a residual housing requirement to be met from the release of Green Belt land. This too is supported by Peel.

Meeting the Borough's full development needs

Whilst supportive of the overall strategy and aspiration of the plan as emerging, Peel considers that there are opportunities to further improve the sustainability and robustness of plan and to ensure it meets the wider spatial needs of the Borough. These are important considerations in ensuring the plan is able to be found sound at Examination.

These enhancements to the plan can be achieved in a manner that does not take away from New City or the planned growth in and around Warrington which is so critical to this. The following key observations are made in this regard:

Securing a sustainable future for the outlying settlements of the Borough

The Outlying Settlements of Warrington face significant challenges and threats to their long term sustainability. This is demonstrated by reference to key indicators, including affordability of housing, changing demographics and the current health and viability of their services and Local and Neighbourhood Centres.

Collectively these settlements are proposed to grow by only 10% over a 20 year plan period. Peel is concerned that this restricted level of growth will have lasting adverse effects on the sustainability of these settlements as places to live and does not reflect the level of market and affordable housing they require. Supporting the sustainable growth of these settlements can address these issues, whilst providing the opportunity to deliver new infrastructure needed to secure a sustainable future for these areas and address existing infrastructure deficiencies (such as in secondary schools).

It is noted that the PDO's Spatial Objectives do not capture the need to secure the future sustainability of these settlements and, as a result, this matter does not appear to have been given any consideration in the Council's appraisal of Spatial Options.

The role of the Outlying Settlements in delivering New City

Whilst the realisation of New City requires a critical mass of development to be directed to the main settlement of Warrington, as proposed through the PDO, Peel considers that some growth in the outlying settlements is a necessary part of, and can make a positive contribution to, the New City vision. This will ensure that the core urban area is supported by sustainable and viable settlements providing a different but complementary housing offer and environment to the town of Warrington to attract and retain economically active households.

It is noted that the Council's appraisal of the Spatial Options is undertaken on the basis that only growth in and on the edge of Warrington can make a positive contribution to New City. To the extent that development is directed to other parts of the Borough, the Council's appraisal assumes that this will, at best, have a neutral outcome in terms of contribution to New City. Peel would encourage the Council to reconsider this conclusion since the Outlying Settlements also need investment in new homes to ensure the right amount, type and quality of homes in the Borough overall.

Balanced growth and avoiding a north-south divide in Warrington

There is an opportunity to achieve a more sustainable relationship between housing and employment through further consideration of the Borough's economic geography. In particular, the limited amount of development proposed in the north of the Borough means that the plan has a strong southern emphasis. The north of the Borough also requires new housing investment and is well placed to achieve it in a sustainable way. Further growth in the north would better reflect the reality of a more dispersed economic footprint and the influence of areas outside of Warrington itself in determining the most sustainable location for future residential growth.

It is noted that some of the Borough's key economic drivers, which have a significant bearing on travel patterns, are located in the north of Warrington (e.g. Omega, Birchwood Park and strategic road connections within Liverpool, Manchester and major employment locations such as Trafford Park and the M6/A580 Corridors in St Helens and Knowsley). An increased focus on residential development in the north of the Borough would realise significant sustainability benefits in this regard through a more effective co-location of housing, employment and strategic transport connections, reducing travel and congestion on the local and strategic road network in and around Warrington.

Growing beyond Objectively Assessed Need

Whilst fully supportive of the proposal to deliver a level of housing growth which exceeds the Objectively Assessed Need, Peel considers that the housing requirement should be increased further. The level of uplift proposed to the Objectively Assessed Need of 955 dwellings per annum is c16.5%. Peel would question whether this scale of growth is commensurate with the New City aspiration, which provides a very ambitious vision for the future of the Borough. New City goes beyond building on Warrington's success as a place and, by definition, seeks transformational change, exceeding what has gone before.

It is noted that through the Sustainability Appraisal, the Council has considered an annual requirement figure of 1,332 dwelling per annum ('Higher Growth Level' within the Sustainability Appraisal). Given the scale of the New City aspiration, there would be merit in the Council giving further consideration to whether a figure closer to the 'Higher Growth Level' requirement more closely reflects the ambition of New City.

Notwithstanding this, there is a need to ensure a robust and reliable supply of housing land is identified which will deliver the aspiration and objectives of the plan. To secure this, Peel considers that greater provision should be made for a flexibility allowance within the planned supply – that being 20% rather than 5% as proposed. This will ensure that the delivery of the plan is not undermined in the event of one or more key sites not coming forward at the rate currently anticipated. Even based on an annual requirement of 1,113 residential units per annum as proposed through the PDO, this would require the allocation of land capable of accommodating 27,728 units over the plan period, approximately 3,500 more than currently proposed.

Safeguarded land

In order to ensure the Green Belt can endure over the long term and will not need to be reviewed through the new Local Plan, the amount of land allocated as safeguarded for future residential development beyond the plan period should be increased from 137 ha to 339 ha. This is based on planning for development needs for 20 years rather than 10 years after the plan period and applying a more realistic assumption around the likely requirement for these needs to be met through the release of land from the Green Belt.

Employment land requirements

The PDO does not make sufficient provision for meeting local employment development needs. Whilst the plan supports a number of strategic employment development opportunities, such as the expansion of Port Warrington, which are supported by Peel, these will capture demand which exists across the wider north west area in the context of a number of critical drivers of growth in the logistics sector. They will partly respond to opportunities which Warrington presents to increase its share of the northwest logistics market building on its strategic transport connections.

There is a need to plan for additional employment land to meet Warrington's localised needs however which may not be met by these strategic opportunities.

Outlying Settlements – sustainable infrastructure provision

At this stage Peel would question some of the conclusions drawn by the Council regarding the infrastructure capacity constraints within the Outlying Settlements. These have informed the Council's appraisal of various growth scenarios for these settlements.

It is considered that a more holistic review of secondary school capacity should be undertaken to inform this analysis, including a consideration of the catchment area of these schools and the extent to which they are drawing pupils from outside of the Borough. Peel also considers that there may be scope to secure an increase in school capacity through extensions to a number of existing schools, including both Culcheth High School and Lymm High School, contrary to the Council's conclusions. Further to this Peel would encourage the Council to also consider infrastructure capacity and constraints in the context of proposals put forward for developers and land owners to mitigate such constraints as part of the sites being promoted for allocation. Such proposals might serve to provide additional capacity to enable the settlements to grow by more than the 10% assumed by the Council, whilst also providing new infrastructure to address existing issues which these settlements face.

In addition, within a number of settlements, local service provision is struggling as the economy and trends change, with settlements unable to sustain basic health, community, education and retail facilities. Consideration should be given to the opportunities that would be presented by increased levels of housing in those settlements to support local facilities.

It is also important to note that the various constraints affecting the Outlying Settlements will not be the same in each and some will have a greater capacity to grow than others. In this regard, it is important that the Council undertakes bespoke assessments of each settlement and the opportunities and constraints which each presents with respect to its future growth. A universal cap of 10% as proposed may not represent the most sustainable approach. The Outlying Settlements clearly do not have to accommodate the same proportionate level of development; however, the level of housing provided for should recognise a baseline minimum level reflecting their current comparative size and role. The Local Plan should then progress to determine a bespoke figure for each based on an appreciation of that settlement's constraints and opportunities for sustainable growth.

Revised Green Belt appraisal

Peel welcomes the revisions made within the Green Belt Assessment in respect of the Green Belt contribution made by defined parcels in Lymm and Hollins Green which have been downgraded from 'strong' to 'moderate.'

Peel would question the justification for treating the planned HS2 route as a readily recognisable physical feature² in appraising the contribution made by parcels of land through which this route will pass. At this stage, the route is legally protected from development however it does not exist as a physical feature and should not be treated as such for the purposes of a Green Belt appraisal.

Progressing the Local Plan

Peel's representations highlight a number of areas where the plan could be enhanced to ensure it presents a sustainable spatial strategy which fully responds to the challenges and opportunities which Warrington faces and which will ensure the plan's objectives are achieved. This is important to progressing a sound plan. These enhancements are suggested in the context of New City continuing to be the principal driver of the plan and a recognition that the

² As required in accordance with paragraph 85 of the NPPF

plan will need to deliver the level of growth already proposed by the Council in and on the edge of Warrington in order to achieve this. They include:

- Increased levels of housing in the north of the Borough to ensure a more balanced sustainable strategy overall and to avoid an over-reliance on the south of the Borough;
- Increased levels of housing in the Outlying Settlements to provide the right amount, quality and choice of housing in those local areas and to help support and sustain local facilities and infrastructure;
- A potential increase in the proposed housing requirement (closer to the 'Higher Growth Level' considered in the Sustainability Appraisal);
- Notwithstanding the above, in the context of a continuation of planning for 1,113 residential units per annum, the allocation of housing land to deliver at least 27,728 units (an uplift of approximately 3,500 units over the plan period);
- An increase in the amount of land to be designated as 'safeguarded' for future residential development from 137 ha to 339 ha.

Proposed development sites

An additional and more diversified supply of land would be required to accommodate the above requirements. In responding to the wider issues raised by Peel, this should be provided through the targeted release of Green Belt sites on the edge of Outlying Settlements. These will need to be selected based on a range of considerations, including Green Belt context, landscape sensitivity, the sustainability of the location in strategic terms (including proximity to key employment areas and strategic road connections) and the absence of infrastructure constraints or the ability of proposals to mitigate such constraints.

In this regard, Peel has suggested five proposed residential allocations on the edge of the Outlying Settlements of Lymm, Culcheth, Hollins Green and Croft. These are shown on the plan below.

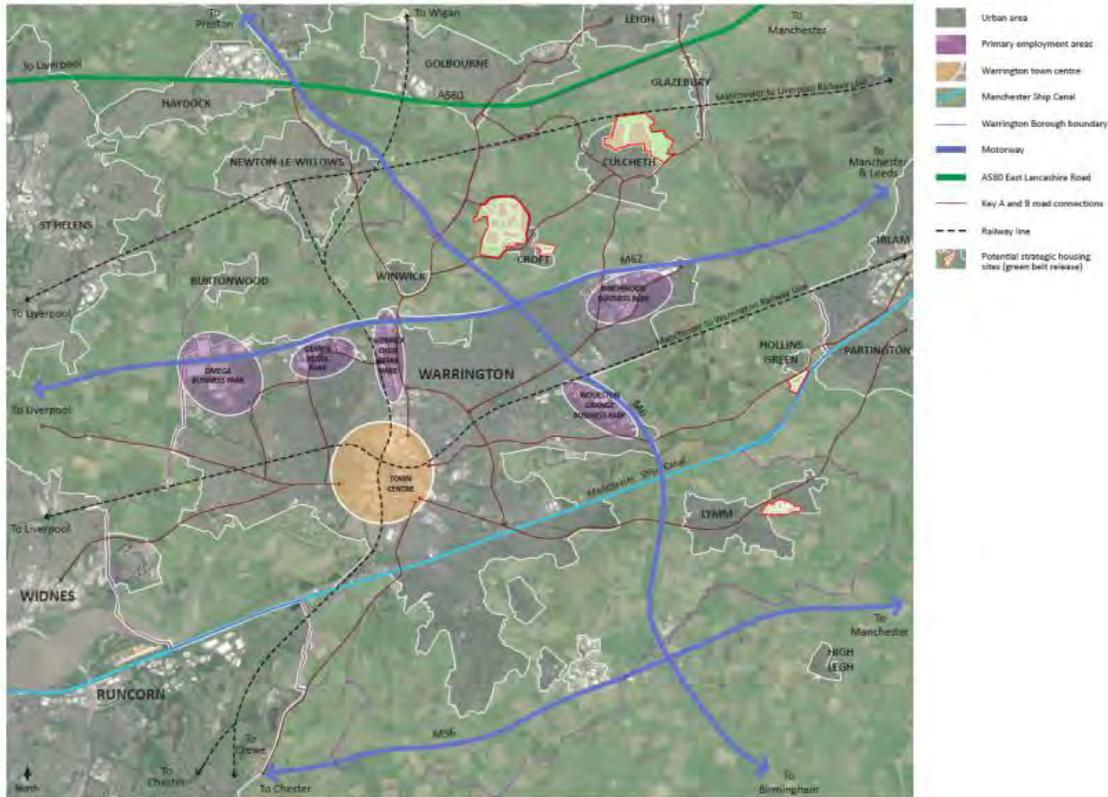


Figure 2: Proposed sustainable settlement extensions

These proposals are supported by Site Prospectuses and a body of technical evidence which demonstrates their sustainability as development locations and the absence technical constraints which would preclude their delivery over the plan period. A sustainable vision and masterplan is presented for each site, which demonstrates how the proposed scheme responds to its physical context and, in each case, the site's ability to deliver the social and community infrastructure to support the development and which can provide a solution to existing infrastructure capacity issues facing the Borough and its settlements.

These sites can be allocated through the Local Plan as part of a balanced spatial strategy which achieves the ambitions of Warrington New City, including maintaining a focus on Warrington whilst ensuring the Plan responds positively to the wider spatial needs and sustainability challenges which Warrington faces.

1. Introduction

- 1.1 This report has been prepared by Turley, with inputs from Randall Thorp and ITransport, on behalf of Peel Holdings (Management) Ltd (“Peel”)³. It provides detailed comments on the Warrington Local Plan Review Regulation 18 Consultation Preferred Development Option (“the PDO”) and associated evidence base published by the Council.
- 1.2 Peel is one of the foremost real estate, infrastructure and transport investment enterprises in the UK. It has major interests and assets across the United Kingdom, including in particular in the North West of England. Over the last four decades, Peel and its partners have invested over £5billion across the North and built on the region’s strengths to help drive its economy. Peel’s track record is one of delivering transformation and creating vibrant places through regeneration and innovation.
- 1.3 Peel acts as both a developer and facilitating landowner in the housing, employment, energy and port sectors, working alongside a wide range of public and private sector partners. It is delivering some of the country’s largest development projects and owns major land and infrastructure assets across the North.
- 1.4 Working with public and private sector partners, Peel is a major advocate of the Northern Powerhouse. Its ambitious projects across a range of sectors will play a key role in realising this ambition and rebalancing the economy. Peel’s Ocean Gateway vision embodies this – a 50 year, £50 billion investment in strategic development opportunities across the North West, book ended by Liverpool and Manchester as engines of the northern economy. It represents an internationally significant programme of private sector investment in transport, logistics, communities, regeneration and sustainable resources. It will capitalise on the region’s potential to compete on a global stage. Warrington sits at the heart of the Ocean Gateway.
- 1.5 The Peel Group of companies includes Peel Land and Property, Peel Ports and Peel Environmental all of whom have major interests in Warrington and the Local Plan.
- 1.6 Comments in this report are provided in the context of Peel’s significant and diverse land and development interests in Warrington, including:
- Sites within the Warrington Waterfront proposed development area (including Peel Ports’ Port Warrington and expansion land and land at Arpley Meadows owned by Peel Land and Property and Peel Environmental);
 - Land within the Warrington South West Extension proposed development area, owned by Peel Land and Property;
 - Major greenfield and Green Belt sites with significant residential development potential across the wider Borough, owned by Peel Land and Property;

³ Peel Holdings (Management) Ltd is providing comments in relation to the assets and interests of the Peel Group’s operating companies in Warrington. These are Peel Holdings (Land and Property), Peel Ports and Peel Environment

- Various smaller sites within the urban area and outside of the urban area with mixed use development potential, owned by Peel Land and Property;
- 1.7 Peel submitted extensive comments to Warrington Borough Council on the Regulation 18 Consultation Scope and Contents Document in December 2016. These further representations build on these comments in the context of a more clearly expressed spatial strategy for the future growth of the Borough as provided by the PDO document.
- 1.8 Peel's various assets present significant sustainable development potential. They can make a strategic contribution to realising the Local Plan's aspirations and objectives and to delivering a sustainable future for the Borough through providing new homes, employment development and the infrastructure which Warrington needs.
- 1.9 Alongside Peel's representations to the Scope and Documents document in December 2016, a series of Development Prospectuses were submitted which outlined a sustainable vision and masterplan for the delivery of Peel's key land holdings over the plan period. Prospectuses were submitted in respect of the following sites:
- Land north west of Croft;
 - Land off Lady Lane, Croft;
 - Land off Rushgreen, Lymm;
 - Land off Manchester Road, Hollins Green; and
 - Land west of Higher Walton.
- 1.10 With the exception of land west of Higher Walton, for which the Council has commissioned masterplanning and site appraisal work and which is a draft proposal in the PDO document, the Prospectuses for these sites have been updated by Peel following further technical analysis of each site and a review of potential on site constraints and opportunities. This process has allowed a more robust and deliverable masterplan to be developed, supported by a body of technical evidence and allowing opportunities to address localised infrastructure constraints.
- 1.11 The updated Prospectuses are submitted as part of Peel's representations to the PDO. Each is supported by a technical appendix containing a series of site surveys and appraisals relating to highways/transport, landscape character, flood risk/drainage and utilities and ecological considerations.
- 1.12 In addition, further proposals are presented in this representation in respect of Peel's land at Statham Meadows. Following following a review of the Council's evidence and consideration of the potential of this site, alternative development options are being put forward.
- 1.13 . The remaining ten sites for which call for sites forms were submitted as part of Peel's December 2016 representations are either identified as part of proposed allocations in the PDO (Port Warrington and expansion land and Arpley Meadows) or are located within the urban area and will be considered for allocation by the Council through the

next phase of development of the Local Plan. Peel's proposals in relation to these sites and their treatment in the emerging Local Plan is unchanged.

1.14 The remainder of this report is structured as follows:

- Section 2 provides general comments on the overarching aspirations and drivers of the PDO;
- Section 3 considers the housing requirement of the Local Plan and the associated land requirement;
- Section 4 considers the employment land requirement of the Local Plan;
- Section 5 considers the need to ensure adequate provision is made for the growth of the Outlying Settlements;
- Section 6 provides comments on infrastructure capacity constraints and opportunities in the Outlying Settlements
- Section 7 provides comments on other aspects of the evidence base published by the Council
- Section 8 outline the opportunities to enhance the Local Plan in light of the issues raised through the proceeding sections
- Section 9 provides further information on additional allocations proposed by Peel to the extent that these vary from those suggested through its previous representations (December 2016).

2. Overarching comments

General comments

- 2.1 Peel supports the progression of the Warrington Local Plan and is encouraged by the aspirations it sets out for the future of the Borough.
- 2.2 The realisation of the Warrington New City aspiration sits at the heart of the PDO and underpins the spatial strategy and growth ambitions set out. Warrington New City is about the town realising its full potential; its transformation from a New Town into a New City at the heart of the Northern Powerhouse, capitalising on its strategic position between Manchester and Liverpool and at the intersection of four major economic growth and development corridors of national importance:

- The M62 Corridor;
- The M56 / A55 Corridor;
- The Manchester Ship Canal Corridor; and
- The M6 / HS2 Corridor

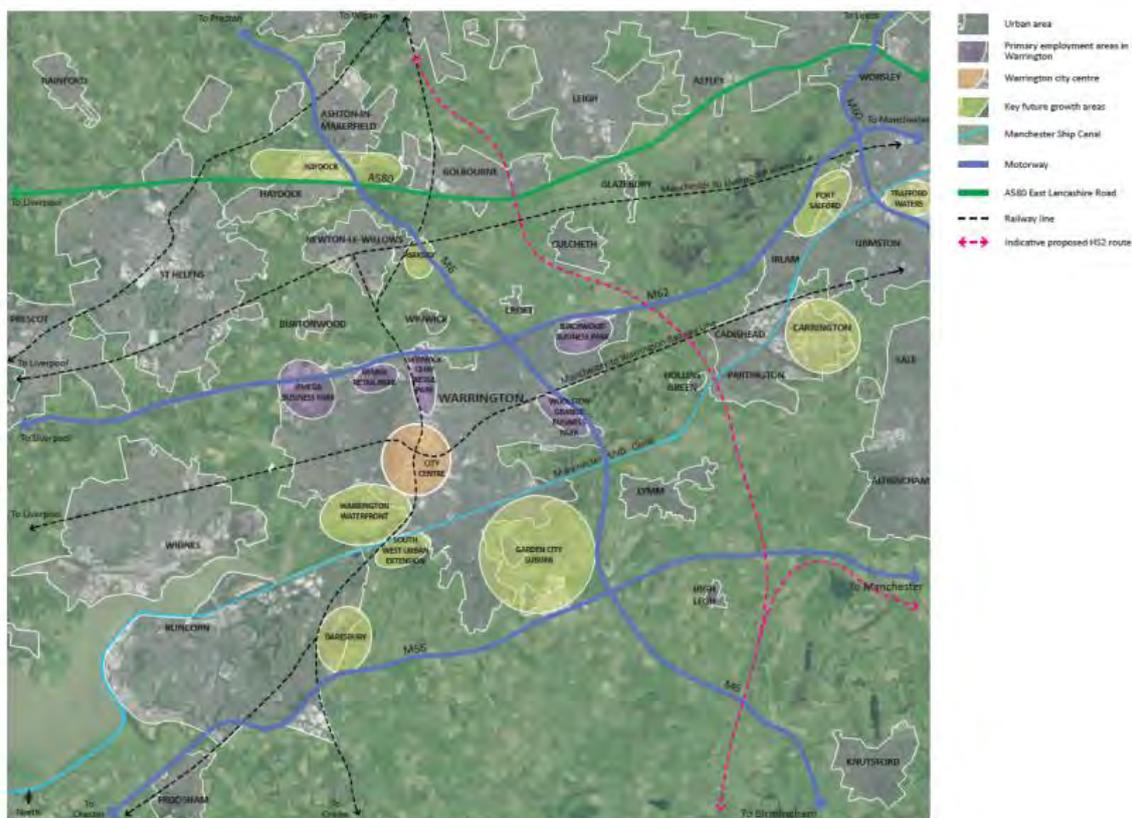


Figure 2.1: Warrington Strategic Context

- 2.3 New City seeks a sustainable future for Warrington with a focus on new and improved infrastructure; delivering the homes which Warrington needs; increasing and diversifying employment and making Warrington more resilient in the face of future economic and environmental challenges. It encapsulates economic, social and environmental dimensions. ‘Quality of place’ runs through this vision.⁴
- 2.4 Peel fully endorses the New City aspiration. The Local Plan will provide the spatial expression of this and will be an important delivery vehicle for New City. Peel recognises that this requires a critical mass of future development to be directed to the main town of Warrington to realise its transformation from a large town to a dynamic and economically strong city. Peel also recognises the inherent constraints which Warrington faces and which impact on its ability to grow sustainably, particularly its highway network and social infrastructure capacity constraints. The need to remove these constraints has informed the spatial strategy proposed.

Selected development locations – Warrington Waterfront and South West Urban Extension

- 2.5 The Council has undertaken an appraisal of options for realising the New City aspiration. It has identified a series of key development sites which will unlock Warrington’s potential, being drivers of growth in their own right whilst having the ability to address existing and longstanding infrastructure constraints which are holding Warrington back. These sites are strategically located and build on existing infrastructure assets (such as the Manchester Ship Canal) and future planned infrastructure (such as the Western Link) which are key to Warrington’s future growth. Peel recognises the significant benefits that will be realised through the focus on the five main development areas: Warrington Town Centre; the wider urban area; Warrington Waterfront; Warrington Garden City Suburb and the South West Warrington Urban Extension in delivering New City.
- 2.6 Peel has significant land interests within the Warrington Waterfront and South West Urban Extension sites, including land at Arpley Meadows and Port Warrington within the Warrington Waterfront. Peel will support the Council in bringing these strategic sites forward through the Local Plan. They have been subject to masterplanning work by the Council, which is supported by Peel, to ensure they realise their full development potential and contribution to the New City. Peel recognises that significant infrastructure investment is needed to realise these development opportunities and is fully supportive of the recent recommended “red” route announcement for the delivery of the Western Link Road connecting the A56 and the A57. Peel is committed to continuing to work with the Council to deliver this critical infrastructure.
- 2.7 The Western Link scheme will not only provide enhanced connectivity and resilience to Warrington’s highway network it will support housing and economic growth. The increased use of The Manchester Ship Canal and the potential for further swing bridge movements and potential traffic impacts would be lessened by virtue of a further high level crossing. Peel Ports however remain committed to working with Warrington

⁴ Warrington Means Business – Warrington’s Economic Growth and Regeneration Programme (Warrington & Co 2017)

Borough Council around vessel movements during peak periods in the context of the Memorandum of Understanding (May 2014).

- 2.8 Peel is fully supportive of the proposed allocation of the sites arising from the joint masterplanning work within the Local Plan as outlined above. Peel welcomes the Council's recognition of the development potential of Port Warrington to deliver an increase in the Borough and region's multi-modal freight and logistics capacity and to secure significant employment and economic benefits. The allocation of 75 Ha and around 200,000 sq.m of development reflects that the Local Plan is seeking to respond to strategic opportunities which the Borough presents, as encouraged by NPPF and the National Policy Statement for Ports (January 2012).
- 2.9 The expansion of Port Warrington is a key part of the Mersey Ports Master Plan developed by Peel Ports and forms one of a number of strategic port investments to promote the more sustainable transport of goods across the region and which capitalise on the demand for increased logistics and freight infrastructure in the context of growth and expansion at the Port of Liverpool. Notwithstanding the existing Port Warrington operations are situated within the Green Belt, the principle of Green Belt release to facilitate the further expansion of port activity was established via the adopted Core Strategy. There are locational specific requirements for port expansion land to be adjacent to the berthing of vessels.
- 2.10 It is accepted that the quantum of port expansion land is such that its release will be dependent upon the delivery of the Western Link Road which will provide a direct vehicular access suitable for HGV traffic. Significantly it would negate the continued use of the historic and unsuitable vehicular access for HGV's via country lanes passing through Moore Village. The opportunity also exists for Port Warrington to be truly multi-modal as there is planning permission in place to re-instate the rail freight connection to the West Coast Main Line.
- 2.11 The expansion of Port Warrington will provide further opportunities to open up The Manchester Ship Canal to freight connecting the new Liverpool 2 deep-sea container terminal to key North West markets, including in Merseyside and Greater Manchester and in doing so supporting the sustainable movement of goods in serving these large urban areas. This will meet the need to grow the supply of high quality logistics sites in the North and North West in the context of a number of critical drivers of change in this sector, including the opening of Liverpool 2 itself, as well as wider changes in retail markets and growth of e-commerce.
- 2.12 More generally, the proposed allocations outlined in the PDO document provide a mix of residential, commercial and employment development proposals. They respond to the inherent opportunities presented by these sites to drive the growth of the Borough in the context of their strategic location. The proposed extensions to the urban area will collectively provide a critical mass of development in a single broad spatial area to secure the infrastructure needed to unlock the town centre and waterfront and facilitate their development and regeneration. The scale of opportunities here can deliver genuine change and will provide the opportunity to create liveable places which embrace and contribute to the Garden City concept as a key principle of New City.

Housing requirements

- 2.13 Peel supports the Council's proposal to deliver a level of housing above the Objectively Assessed Need and considers this to be critical to the realisation of New City as a policy stimulant to the growth of the Borough. Peel agrees that this presents Exceptional Circumstances to justify the release of land from the Green Belt in the context of the Borough's urban land supply. It is noted that the Council has sought to maximise development within the urban area in order to arrive at a residual housing requirement to be met from the release of Green Belt land. This too is supported by Peel.

Towards a balanced, and flexible Local Plan that provides for the whole Borough

- 2.14 Whilst supportive of key aspects of the PDO, Peel considers that the Local Plan needs to go further to ensure it secures a sustainable future for the Borough, and responds fully to the spatial issues and opportunities which exist across the Borough as a whole. At the heart of this is the need for the plan to fully consider and plan for development needs beyond Warrington itself and to establish how these can be accommodated in a sustainable manner.
- 2.15 These representations provide comments on these issues and how the plan may be developed further in response. This is about ensuring the robustness and deliverability of the plan as a whole, ensuring that the focus on New City is a balanced one and to support the realisation of this aspiration.
- 2.16 The following sections provide further comments on the above focused around the following considerations:
- The potential to plan for a higher level of housing and the need to ensure an adequate and flexible supply of land to deliver the housing requirement;
 - The requirement to meet the needs of the Outlying Settlements, in terms of the right amount, type and choice of homes, and to support local facilities and infrastructure;
 - The need to consider a more sustainable relationship between housing growth and key economic drivers of the Borough – in particular to ensure the needs of the northern part of the Borough are met;
 - The role played by Outlying Settlements in realising the New City aspirations;
 - The potential to plan for a higher level of housing and the need to ensure an adequate and flexible supply of land to deliver the housing requirement;
 - The need to plan for additional safeguarded land;
 - The Council's further appraisal of the Green Belt and contribution made by individual parcels.

2.17 A series of amendments for the Council's further consideration are put forward, including the proposed allocation of selected sites on the edge of Outlying Settlements. These allocations would represent a sustainable and deliverable response to the spatial issues raised, whilst providing an additional source of land to ensure that the right amount and type of homes can be delivered across the Borough as a whole.

3. Housing need and requirement

Summary

- 3.1 Over the Plan period Warrington will face significant and increasing housing need pressures. This housing need is underpinned by strong projections of a growing population reflecting the authority's demographic profile. It also reflects the strength of market demand across much of the authority supported by a healthy and growing economy and the locational benefits associated with its strategic infrastructure connections.
- 3.2 Peel is fully supportive of the proposal to deliver a level of housing growth which exceeds the calculated Objectively Assessed Need level. However, Peel considers that there may be scope to increase the housing requirement further. The level of uplift proposed to the Objectively Assessed Need of 955 dwellings per annum is c16.5%. Peel would question whether this scale of growth is commensurate with the New City aspiration, which provides a very ambitious vision for the future of the Borough. New City goes beyond building on Warrington's success as a place and, by definition, seeks transformational change, going significantly beyond what has gone before.
- 3.3 It is noted that through the Sustainability Appraisal, the Council has considered an annual requirement figure of 1,332 dwelling per annum ('Higher Growth Level' within the Sustainability Appraisal). This level of need is identified as being required to support a continuation of the authority's recent success in generating new employment opportunities. Existing and planned investment focused investment around the New City concept should be viewed as a representing a catalyst for realising the potential for higher or at least comparable employment growth, but not reducing it. Given the scale of the New City aspiration, there would be merit in the Council giving further consideration to whether a figure closer to the 'Higher Growth Level' requirement more closely reflects the ambition of New City.
- 3.4 Notwithstanding this, there is a need to ensure a robust and reliable of housing land is identified which will deliver the aspiration and objectives of the plan. To secure this, Peel considers that greater provision should be made for a flexibility allowance within the planned supply – that being 20% rather than 5% as proposed. This will ensure that the delivery of the plan is not undermined in the event of one or more key sites not coming forward at the rate currently anticipated. Based even on the annual requirement of 1,113 residential units per annum which reflects the 16.5% uplift from the OAN, the application of this more appropriate flexibility allowance would require the allocation of land capable of accommodating 27,728 units over the plan period, approximately 3,500 more than currently proposed. This level of provision would also provide greater flexibility in accommodating higher demand pressures resulting from a realisation of the stronger employment growth levels therefore ensuring that the full potential of the authority in realising its ambition is not curtailed.

Detailed comments

- 3.5 The Preferred Development Option (PDO) recognises the increase in the Council's evidenced objectively assessed need (OAN) from 839 homes per annum to 955 homes per annum. The PDO confirms an intention to plan for a target of 1,113 homes per annum over the twenty year plan period (2017 – 2037), or 22,260 homes in total.
- 3.6 This housing requirement recognises the implications of supporting the anticipated economic potential of Warrington as proposed through the Cheshire & Warrington devolution bid. Recognising the historic backlog generated since 2015 this rises to 23,107 homes. The Council also includes an additional flexibility allowance of 5%, resulting in the PDO identifying a total requirement for 24,220 homes to be provided for over the plan period (2017 – 2037).
- 3.7 Peel welcomes the Council's updating of its evidence base and its acknowledgement of the increase in the full OAN for housing, and the need associated with ensuring that Warrington's economic ambitions are realised.
- 3.8 It is agreed that the Council's published evidence takes into account a number of the specific concerns relating to the OAN submitted by Peel and others in response to consultation on the scope and contents of the Local Plan review at the end of 2016. Specifically this includes the account given to the higher level of need implied by the most up-to-date 2014-based sub-national household projections (SNHP) and the departure from the unjustified approach taken in the application of overly optimistic future labour-force behaviour assumptions.
- 3.9 Whilst the evidence has been updated and is now considered to present a more robust justification of the need for housing in Warrington, Peel continues to identify a number of specific aspects which would suggest that the planned level of provision may not be sufficient to ensure that the Council's economic ambitions are fully realised. It is recognised that the Council has tested a higher level of provision through the SA/SEA (1,332 homes per annum). It is considered that in the context of the concerns identified by Peel that it remains appropriate to ensure that the emerging Local Plan retains sufficient flexibility to accommodate the requirement for land to provide for this higher level of provision.

Setting the Context for Future Housing Needs in Warrington

- 3.10 The PDO correctly recognises that there will be a significant need for new housing in Warrington.
- 3.11 This housing need reflects demographic, economic and market factors which cumulatively reinforce the importance of the borough boosting its supply of housing, in accordance with national policy.
- 3.12 The latest published DCLG household projections (2014-based) continue to project a strong underlying demographic need for new homes in Warrington. The 2017 SHMA Addendum confirms that these projections indicate a need for 740 homes per annum over the plan period, which exceeds the average recent rate of housing delivery in the borough.

- 3.13 The Council's evidence recognises that a continuation of longer-term demographic trends, using a ten year historic period – which are less influenced by the recent slowdown in housing provision – indicate a higher underlying demographic need for housing⁵. It is evident that even in the context of the potential impacts of constraints imposed as a result of comparatively low levels of development, there exists a strong demographic foundation for housing need and demand.
- 3.14 At least in part, this reflects the sustained success of Warrington's economy which continues to demonstrate its vitality and resilience through the creation of over 5,000 jobs in the past three years⁶ (2012 – 2015). This builds on an historic period of sustained high job growth as recognised within the Council's evidence base⁷ which describes the borough as a *'beacon for economic growth within the sub-region'*⁸.
- 3.15 The strong levels of job growth seen over recent years have served to place pressures on the local labour-force. This is exemplified in low levels of unemployment and high levels of economic activity.
- 3.16 The Council's commitment to delivering strong employment growth in accordance with the devolution deal, supported by its wider strategies including the Warrington Means Business Programme, will evidently place greater pressures on the need for housing. It is agreed that this forms a critical determinant in the scale of housing to be provided for.
- 3.17 The absence of an effective and up-to-date policy regarding the provision of housing coupled with a previously constrained housing target⁹ has been a key contributing factor to completion levels remaining considerably below those seen prior to the recession. In the four years to 2007/08 completions exceeded 1,000 dwellings a year, but over the subsequent eight years an average of approximately 600 homes have been completed annually. This has fallen well short of the Council's assessed housing need. This imbalance between supply and demand is an important factor contributing towards the recent worsening in market signals, which has:
- Increased the average price paid for housing in the borough by 10% since 2014¹⁰;
 - Resulted in the highest ratio between lower quartile house prices and earnings in Warrington since the recession¹¹; and
 - Increased the mean monthly rent for two bedroom properties by 7% over the past two years¹².

⁵ GL Hearn (2017) Mid Mersey SHMA Update – Warrington Addendum, Table 12

⁶ Business Register and Employment Survey, ONS

⁷ BE group & Mickledore (2016) Economic Development Needs Study, page 35 confirms that job growth in Warrington has outstripped that of the LEP area, the region and the national average over the period 1998 to 2014.

⁸ Mickledore Ltd (October 2016), 'A review of economic forecasts and housing numbers'

⁹ The NWRS set a minimum target of 380 homes per annum in Warrington for the period 2003 to 2021. The RS was adopted in 2008 and not revoked until 2013 with the target recognised falling considerably below evidenced need with the technical appendix of the submitted draft NWRS identifying an annual need for 1,214 dwellings per annum.

¹⁰ Price paid data, Land Registry – average of £200,573 paid in 2016, which is 10% higher than the average of £182,547 in 2014

¹¹ Ratio of house price to workplace-based earnings (lower quartile and median), ONS – ratio of 6.06 in 2016 is the highest since 2008 (6.20)

- 3.18 Whilst it is acknowledged that the market signals for Warrington continue to compare favourably with the national picture, a failure to respond in the short and long-term – in the context of recognised rising demand pressures – will have significant negative ramifications for those looking to access the housing market. This reinforces the importance of ensuring that the planned level of provision responds fully to potential needs. It is also noteworthy in this regard that Warrington is the 14th least affordable authority out of 39 Local Authorities in the North West, based on the ratio between lower quartile earnings and house prices, signalling a need to boost the supply of housing in the immediate term.
- 3.19 The level of development seen over recent years has also contributed towards the low level of affordable housing delivery. An average of 188 gross completions have been recorded in the borough over the past seven years (2009 – 2016), which falls below the calculated need for 230 affordable homes in the previous 2016 SHMA and indeed the higher need – for 288 units per annum – implied by the latest 2017 addendum. It is of note that one of the factors behind the calculated increase in affordable housing needs over the period between the two studies is a reduction in forecast future supply from relets. Boosting the supply of affordable homes will have a direct impact on immediate and future numbers of available relets. This further serves as an important factor in reinforcing the significant need for new housing in Warrington.
- 3.20 Collectively, it is apparent that Warrington will face considerable demand pressures for new housing. It is critical that the Council continues to plan positively to accommodate this need for new homes.

Consultation on a Standardised Methodology

- 3.21 In February 2017 the Government published its Housing White Paper (HWP). Through the HWP, the Government reaffirmed its appreciation of the scale of the acknowledged national housing crisis and the need for *'radical, lasting reform that will get more homes built right now and for many years to come'*¹³.
- 3.22 On the 14 September the Government published its consultation proposals *'Planning for the right homes in the right places'*. This incorporates a new methodological approach for calculating housing needs with the Government publishing an indicative OAN for each authority in England. The consultation period runs until 9 November 2017 with the Government setting itself the ambition of incorporating updates to current guidance alongside a revised NPPF in Spring 2018.
- 3.23 The draft approach presents a stripped down set of methodological steps which continue to treat the 2014 SNHP as a 'starting point' with a subsequent two methodological steps applying adjustments to account for market signals.
- 3.24 Almost uniquely the consultation documents do not include an indicative OAN for Warrington. Confirmation has been sought from the DCLG as to the reason for this omission. However, following the prescribed methodology it is calculated that the

¹² Private rental market statistics, Valuation Office Agency – mean rent of £567 per month between April 2016 and March 2017 was 7% higher than two years previously (£532 per month, April 2014 to March 2015)

¹³ DCLG (February 2017), 'Housing White Paper: Fixing our broken housing market', pg 7

indicative OAN for Warrington using the new approach would be 914 dwellings per annum. This is evidently closely aligned with the OAN concluded in the Council's latest evidence base, representing a difference of only 4%. This serves to reinforce the Council's assessment of need based on demographic and market signal aspects.

- 3.25 The consultation documents confirm the proposed processes for the transition to the new methodology. Where Plans have not been submitted for examination on or before 31 March 2018 authorities will be expected to plan on the basis of the outcomes of the standardised methodology. Warrington's local development scheme envisages submission after this date and therefore the implications of the consultation process and associated changes to the NPPF will need to be taken into account in subsequent stages of Plan preparation.
- 3.26 The consultation documents confirm that it is the expectation that authorities will use the standardised OAN as representing a minimum level of need. However, it is proposed that:
- “Plan makers may put forward proposals that lead to a local housing need above that given by our proposed approach. This could be as a result of a strategic infrastructure project, or through increased employment (and hence housing) ambition as a result of a Local Economic Partnership investment strategy, a bespoke housing deal with Government or through delivering the modern Industrial Strategy.”¹⁴*
- 3.27 The Cheshire and Warrington LEP has established a significant economic ambition for growth, with this referenced and expanded upon within *Warrington Means Business*.
- 3.28 As is apparent within the Council's evidence base and strategies, Warrington has the potential to see a sustained level of new job creation, responding to its economic assets and the enhanced opportunities presented through the planned investment in the devolution deal. Indeed the successful realisation of its economic investment and plans associated with the realisation of the New City concept is intended to set the authority on a strong and sustainable growth trajectory. It is reasonable to assume that investment will be catalytic in nature with Warrington building on its strong growth credentials to reach new heights of job generation and investment.
- 3.29 In this context it is considered of critical importance that the other policy arms of the Plan do not serve to constrain this growth trajectory but rather support and complement the vision. As the Council's evidence recognises, this will have implications for the scale of future housing growth which will be needed to facilitate and support Warrington's growing economy.
- 3.30 It is considered critical in this regard that the Council continues to articulate these ambitions as exceptional circumstances in justifying its planned provision for housing where the standardised methodology implies a lower starting point level of need.
- 3.31 A failure to plan positively for new housing in the context of a realisation of the economic growth objectives of the city will place increasing pressure on the housing market,

¹⁴ DCLG (September 2017) Planning for the right homes in the right places: consultation proposals, Paragraph 46

having implications for the affordability of housing and leading to unsustainable commuting patterns. There is also the key risk that economic ambitions will not be realised if the housing strategy is not fully aligned, as the local economy may struggle to attract and retain the requisite workforce.

Technical Points of Challenge on the OAN

- 3.32 As set out above Peel are supportive of the principle being taken by the Council in uplifting its OAN and the planned requirement for new housing. Irrespective of the status of changing guidance in the assessment of housing needs it is readily apparent that there will be a significant need and demand for new housing in Warrington. It is critical that the Council maintains a positive approach in this regard.
- 3.33 In the submission of its representations to the Regulation 18 consultation on the Draft Plan, Peel raised a number of specific points of challenge to the approach and methodology applied to arrive at the Council's previously concluded OAN and requirement. Primarily these concerns can be summarised as follows:
- A concern that the 28,000 additional jobs growth planned for over the plan period would not truly realise the economic potential of Warrington; and
 - Irrespective of whether this was an appropriate level of job growth, the methodology applied in assessing the implications for housing need presented a significant risk in underestimating needs as a result of unjustified optimistic changes in labour-force behaviours.
- 3.34 Whilst Peel remain supportive of the Council's positive approach in planning for a level of need which exceeds the OAN at a headline level, concerns remain that the proposed requirement for new homes is only 16.5% above its most up-to-date OAN. In the context of the scale of ambition established through the devolution deal and the anticipated impact that delivering Warrington New City would have, this level of 'additionality' continues to represent a modest, restricted uplift.
- 3.35 Equally whilst the narrative within the Plan and supporting investment documents is appropriately positive in its establishment of the scale of job growth ambition, the reality remains that the implied level of annual job growth falls short of that which has been achieved, and sustained, over the recent past in Warrington. Again this serves to challenge the extent to which the investment is expected to represent a step-change and a new trajectory of growth for the city.
- 3.36 In this context and reflecting on the key concerns previously expressed through the representations on the previous Draft Plan it is recognised that a number of other representors also provided a series of comparable challenges to the technical evidence underpinning the OAN and housing requirement, with the Council's published evidence base including a review and response to these representations¹⁵.

¹⁵ GL Hearn, Warrington Local Plan: Review of Representations on OAN, May 2017

- 3.37 Reflecting directly upon the points raised by Peel and others through the representation, we note that the Council's response covers these aspects. An updated response is considered against each below.

Job Growth Ambitions

- 3.38 The Council has dismissed concerns raised around the ambition of the economic growth target, when considered in the context of stronger historic levels of job growth.
- 3.39 Whilst it is agreed that there are challenges associated with simply extrapolating forward historic levels of job growth as being representative of future growth, as set out above there is a concern here that the Council is falling short of supporting its own ambitions.
- 3.40 It is recognised that there have been a number of specific factors which have resulted in strong employment growth in Warrington over recent years. However, the premise of the New City is understood to ensure that these positive foundations are built upon and to set the area on a sustained and sustainable trajectory of growth. In this context setting out on the basis that job growth will be more muted than over recent years appears to contradict the ambition. For the reasons set out in Peel's previous representations there is strong justification in assuming that the Council's planned provision of employment land and strategic investment plans will support a continuation of strong employment growth. Existing and planned investment focussed around the New City concept should be viewed as representing a catalyst for realising the potential for higher or at least comparable employment growth, but not reducing it.
- 3.41 In this context Peel support the Council's continued consideration of the higher growth option presented within the PDO and appraised through the SA which supports higher growth of 35,000 jobs over the plan period. Retaining an appreciation of the impacts of achieving stronger job growth will be important in mitigating any risks associated with undermining the realisation of business investment and employment growth potential.
- 3.42 It is noted that the Council has acknowledged a correction to the evidence base with regards to the Northern Powerhouse scenario previously presented in the evidence base. Peel previously noted concerns with the methodology applied in this regard, but it is considered that the corrected position – which sees the scenario implying a lower level of need than even the baseline scenario – appears counter-intuitive. The purpose of the Northern Powerhouse is to drive growth and rebalancing of the northern economy. It is not considered that as currently presented this scenario is comparative to the assessment of economic growth potential presented consistently through the Council's evidence.

Translating Economic Growth to Housing Need

- 3.43 An important contributing factor to the elevation of the evidenced need for housing in the Council's updated evidence base is the application of less pronounced assumptions around future improvements to the economic activity rates of its workforce. As we set out previously in our representations, this is considered to be important in ensuring that risks of failing to provide adequately for the growth in employment are avoided. It is noted, however, that the SHMA evidence continues to base its forward projections of need on the application of future labour-force assumptions implied within the Experian forecasts.

- 3.44 Within the Council's response to the OAN representations, this issue is considered in some detail with direct reference made to the views of the Inspector examining the Telford and Wrekin Local Plan. It is recognised that the approach taken in the Council's evidence base appears to be more reasonable than the approach challenged by the Inspector in so much that it applies an upwards adjustment to the demographic projection and does not apply marked behaviour changes outside of the economic activity rates.
- 3.45 However, the Council's evidence base only presents a cumulative comparison of the projected changes of the economic activity rates to the whole 16+ population with insufficient detail presented to enable a judgement to be made as to the reasonableness of the approach adopted. Additional detail is required to understand the following:
- The extent to which adjustments to those of core working ages appear reasonable when compared to other highly performing economies and in recognition of the comparatively high economic activity rates already apparent in the borough, noting that the Council's own documents confirm that Warrington: *Ranks as number one out of 64 cities for the highest percentage of employment per population with 79.8% of its population in employment*¹⁶. Insufficient detail is presented in the Council's latest evidence, inhibiting comparisons and consideration of the reasonableness of the assumptions made as to the assumed additional capacity to be drawn from the existing workforce. The Council's previous evidence base documents detailed the current and projected economic activity rates assumed for broad age groups, highlighting that the level of economic activity assumed for those aged 25 to 49 – reaching the mid to high 90s by the end of the assessment period – would considerably uplift current rates. The latest Annual Population Survey (APS) shows that few local authorities in England currently have such high levels of participation amongst this age cohort, and indeed those exceeding 95% are predominantly rural in nature¹⁷ – contrasting with the profile of Warrington;
 - In this context, it is important to understand the reasons for economic inactivity in Warrington, given that this can dictate individuals' ability to join the labour force in future. The APS shows that the majority (80%) of economically inactive residents in Warrington do not want a job, suggesting that they are unlikely to join the labour force for a variety of reasons. Around one in five (21%) are students, while almost a quarter (24%) are looking after their family or home. An ageing population could mean that the number of residents with caring responsibilities is unlikely to decline;
 - The evidence does not illustrate the difference between the level of economic activity respectively assumed for older age groups by Experian and the Office for Budget Responsibility (OBR). Older residents in Warrington – aged 50 and over, who will move into older age categories over the plan period – are acknowledged as having lower levels of qualifications, and it has been recognised by the Local

¹⁶ Warrington Means Business, Warrington's Economic Growth & Regeneration Programme, 2017, page 8

¹⁷ Derbyshire Dales, North Warwickshire, South Northamptonshire, St Edmundsbury, South Ribble, West Devon, Staffordshire Moorlands, Runnymede, Ribble Valley, Rushcliffe, Tandridge, Torridge, Wyre, Dacorum, Fareham and Eastleigh – based on findings of the Annual Population Survey over the period from April 2016 to March 2017

Enterprise Partnership (LEP) that replacing the older population is the highest driver of future labour demand across Cheshire and Warrington. The capacity of this cohort to take up new employment opportunities is likely to therefore be limited, particularly given the LEP's focus on creating higher value and highly skilled employment opportunities. The Council's evidence base does not clarify the assumed reliance on older residents to fill jobs of this nature in modelling future housing need impacts; and

- Related to the above, it is not clear whether the Council's evidence assumes growing economic participation for those over 90 years old, noting its use of an open ended age category (65+). This contrasts with the approach of the OBR, which only forecasts change in those aged 89 or under.

3.46 Whilst it is agreed that the Council's evidence has taken a more balanced perspective with regards to the overall approach than that previously applied – and indeed applied in Telford and Wrekin – the lack of a transparency in the assumptions applied and a testing of further sensitivities in this regard undermines the robustness of the position concluded. For example, the implications of applying the more prudent assumptions relating to long-term adjustments to economic activity rates made by the OBR in supporting forecast levels of job growth would provide a more comprehensive picture, from which to assess the justification behind the concluded level of housing required.

3.47 In this context the additional transparency would assist in understanding the extent to which comparative levels of strong job growth seen recently and the impact these have had on labour-force behaviours in Warrington are considered in the context of the modest level of job growth assumed over the Plan period.

Impact of adjustments

3.48 Peel broadly welcomes the Council's reconsideration of its approach, integrating the employment growth objectives and the planned level of housing provision within the PDO. The elevation of the OAN and the level of housing growth associated with supporting the Devolution Deal in this regard provide a stronger, more evidence-based approach than that previously advanced.

3.49 Peel remains concerned, however, that the approach risks curtailing the realisation of the Council's economic ambitions and the full economic potential of Warrington's business base, by planning to meet its preferred level of housing need.

3.50 The evidence clearly shows a good likelihood that the borough will exceed the level of employment growth represented by the Devolution Deal, with the investment in New City acting as a catalyst for further growth. Equally, there is an acknowledgment in the Council's own evidence that a more prudent approach in projecting future labour-force behaviours would manifest itself in a greater need for housing, even where job growth was realised at the level identified in the PDO.

3.51 Peel considers on this basis that the Plan should go beyond the housing need of 1,113 homes per annum over the Plan period with account given to the undersupply from 2015. This means providing for a minimum need for 23,107 dwellings. However, in the context of an acknowledged greater potential for future employment growth, and uncertainties in forecasting the alignment between job growth and housing need, full

consideration should continue to be given to ensuring that the Plan offers sufficient flexibility – to accommodate the higher level of job growth and housing need recognised within the evidence base as an upper limit. .

- 3.52 Peel considers it reasonable to continue to use this upper end of the range of housing need, as appraised within the SA, in this regard as part of ensuring that sufficient flexibility is available within the Plan to support the full economic potential of the authority. This would require the authority to ensure that sufficient land is provided for over the plan period to accommodate 26,640 homes. This is some 10% higher than the preferred number of homes currently provided for through the provision of land for housing in the PDO.

Housing requirements

Flexibility allowance

- 3.53 Peel's December 2016 representations set out its concerns that the plan does not make an allowance for the non-delivery of sites within the future supply.
- 3.54 The Council proposes the application of a 5% flexibility allowance above its assessed housing need in deriving a housing requirement within the PDO. It is acknowledged that this falls at the lower end of the flexibility rates recently considered as reasonable by other Local Plan Inspectors. The Council justifies this low level of flexibility on the basis of *'Warrington's consistent track record of housing delivery, the commitment of the Council to facilitate development through Warrington & Co and potential that the Fiddlers Ferry Power Station site may come forward for development during the Plan'*¹⁸.
- 3.55 Peel has some concerns that the failure to apply a more reasonable level of flexibility could undermine the delivery of the homes that are needed.
- 3.56 It is acknowledged that the Council has consistently exceeded the plan target set through the revoked Regional Spatial Strategy (RSS). However, the Council's published evidence has successively identified a need for at least 839 homes in Warrington¹⁹ since 2014, increasing to 955 dwellings per annum over the period from 2015 assessed in the addendum for Warrington. The delivery of 641 dwellings on average over the latest two years for which data is available (2014 – 2016) evidently falls considerably short of these NPPF-compliant assessments of housing need.
- 3.57 Furthermore, the longer-term average delivery of 808 dwellings per annum in Warrington (2003 – 2016) falls considerably below the housing requirement for 1,211 dwellings per annum proposed in the PDO over the period from 2017 to 2037. The proposed requirement will necessitate a 50% increase in this historic annual level of provision. Peel disagrees that Warrington can demonstrate a track record of delivering residential development at the level proposed within the Local Plan. The justification for applying only a 5% flexibility allowance is therefore not accepted.

¹⁸ WBC (July 2017) 'Preferred Development Option Consultation, Paragraph 4.13

¹⁹ Based on OAN over the period from 2014 to 2037 in the 2016 Mid Mersey SHMA

- 3.58 Recent DCLG analysis has indicated that between 10 and 20% of residential planning permissions are not delivered at all.² A further proportion of sites deemed to be developable will inevitably not materialise as planning applications. As a result, it is reasonable to assume that upwards of 15% of the total supply (both urban capacity sites and future Green Belt sites) (equating to c3,600 residential units based on a proposed requirement of 24,220 units) will not come forward over the plan period, notwithstanding policy support for these sites.
- 3.59 Whilst the Framework does not prescribe a 'Flexibility Factor' with respect to housing allocations, a recent Report to the Communities Secretary and the Minister of Housing and Planning (March 2016) prepared by the Local Plans Expert Group recommends that Local Plans should include a mechanism for the release of developable 'Reserve Sites' equivalent to 20% of their total housing requirement to enable a Plan to respond to rapid change.³
- 3.60 At the suggested minimum level of 1,113 dwellings per annum (dpa), allowing for this flexibility would result in a housing requirement of 27,728 units, with a requirement for 12,300 units to be delivered through the release of Green Belt land (as opposed to 8,791 as shown proposed in the PDO). This level of provision would also have the significant benefit of ensuring that there is a degree of flexibility to support and accommodate the implied upper estimate of housing need associated with a stronger level of sustained employment growth (a need for 26,640 homes).

Safeguarded land requirement

- 3.61 It is noted that the PDO proposes to re-designate 213.72 ha of Green Belt land as safeguarded land to meet development needs for a further 10 years beyond the plan period. This is an amalgamation of the anticipated future housing and employment land requirements, with 137.52 ha of this based on future housing needs. This is assumed to deliver in the region of 3,100 dwellings.
- 3.62 It is generally accepted that safeguarded land should be identified to ensure the Green Belt can endure over two full plan periods. In this case, the proposed release of land for safeguarding purposes will cover the current plan period plus half of the next plan (based on 20 year plans). Safeguarded land should therefore be identified for 20 years rather than 10 years as currently proposed. This would increase the safeguarding requirement by 100%.
- 3.63 Peel also does not agree that the extent of safeguarded land should be based on an assumption that only 36% of future housing requirements would need to be met outside of the urban area. Whilst new sites within the urban area will come forward, such land is inevitably finite and, by definition, it is reasonable to assume that the extent to which non-Green Belt land can be relied upon to deliver housing growth will reduce over time. This is particularly the case in Warrington where the emerging Local Plan is proposing a strategy of maximising development in the urban area (delivering 771 units per annum over the plan period), including delivering major, high density regeneration proposals in and around Warrington Town Centre utilising brownfield land resources.
- 3.64 The objective of identifying safeguarded land is to reduce the likelihood of a premature future Green Belt review being required. Whilst the Council has attempted to accurately predict how much current Green Belt land may be needed to meet employment and

housing requirements beyond the plan period, the calculation represents a conservative estimate with no flexibility factored into this in the event of, for example, housing and employment requirements being higher in the future or development opportunities within the urban area reducing in the future.

- 3.65 To properly safeguard against the need for a further review of the Green Belt in the short term, safeguarded land should be identified based on the following:
- A period of 20 years after the current plan period (i.e. covering two full plan periods);
 - 50% of future housing and employment needs being met outside of the urban area.
- 3.66 The effect of this is to increase the safeguarding requirement for future residential development to 339 ha.
- 3.67 This is shown in the calculations in Tables 3.1.

Table 3.1: Safeguarding requirement – housing land

Safeguarding requirement – housing	
Number of homes per annum based on OAN	955
16 year requirement ²⁰	15,280
Land requirement at 30 dph net density (assuming 75% developable area)	679 ha
Total land requirement assuming 50% in the Green Belt	339 ha

²⁰ Peel’s representations propose a flexibility of 20% included in the amount of land allocated to meet housing needs over the 20 year plan period. This equates to 4 years supply and therefore land for a further 16 years only is required to be safeguarded for housing.

4. Employment land requirements

- 4.1 The PDO plans for the development of 381 ha of employment land over the plan period, at 19 ha per annum. This has been informed by an Economic Development Needs Study provided by BE Group dated October 2016.

Use of past take up rates

- 4.2 The proposed employment land requirement is based on past take up rates which, the PDO document notes '*...cover a wide range of economic circumstances, from steady growth to recession, and this is reflected in the peaks and troughs of employment development activity.*'
- 4.3 Peel has some in principle general concerns about relying on past take up as a direct barometer of future demand as proposed, particularly in respect of strategic sites. Such sites usually require a shift in planning policy to enable them to come forward (e.g. release of land from the Green Belt). Take is up is therefore often a product of the supply which the planning system has made available to the market. The future designation of such sites must be opportunity-led, having regard to the wider employment market and demand across the much broader area which such sites are, by definition, seeking to create and capture. Past development is therefore not an accurate indicator of demand in this regard.
- 4.4 Accordingly, Peel would question whether strategic development requirements should be included in a calculation of employment needs in the manner proposed by the Council. If it is, this should be approached in a flexible manner for the reasons outlined above.

Meeting local development needs

- 4.5 The Local Plan is seeking to respond to strategic opportunities which the Borough presents, as encouraged by NPPF, through the proposed development of Green Belt land at Port Warrington (75 ha) and designation of land at junction 9 of the M56 (117 ha), as well as giving further consideration to the expansion of Omega. These proposed employment designations are welcomed. However, they are very clearly meeting a strategic need and will serve the wider northwest and northern market. They present specific opportunities for the logistics sector based on the locational advantages which these sites present.
- 4.6 These opportunities will meet the need to grow the supply of high quality logistics sites in the north and northwest in the context of a number of critical drivers of change in this sector, including the opening of Liverpool 2 providing significant additional container capacity, stimulating demand for strategic logistics infrastructure across the north west, as well as wider changes in retail markets and growth of e-commerce. This particularly applies to Port Warrington given its location on the Manchester Ship Canal, its ability to deliver a more sustainable model of freight movement across the region and its role in delivering the wider Mersey Ports Masterplan.

- 4.7 These strategic development opportunities will generally not be meeting Warrington's specific localised and indigenous needs rather it is expected that they will be generators of market demand in their own right, likely to be occupied by national and regional distribution operators which will use these locations as a base to serve their northern customer base. This is confirmed in the Economic Development Needs Study which, in considering Port Warrington, notes that:

“The Manchester Ship Canal is a key asset in the FEMA²¹ and expansion at Port Warrington would help the Borough secure a share of its growth”²²

- 4.8 The rationale for the expansion of Port Warrington is clearly placed in the context of a unique opportunity this presents to grow the Borough's economy and capture a share of future projected growth across a much wider area than Warrington, building on an important infrastructure asset in the Borough. It is an opportunity-led proposal as supported by NPPF. This formed the basis of Port Warrington's treatment in the Core Strategy which notes the ‘... fixed location of the infrastructure within the Green Belt and the potential for multi-modal sustainable transport benefits and contributing to promoting wider sustainable growth.’²³
- 4.9 The Economic Development Needs Study distinguishes between local and strategic employment development need. In respect of the former, it identifies a need for 192.36 ha of land over the plan period and a land supply of just 34.85 ha. This results in a land supply shortfall of 203.31 ha when factoring in a five year buffer.
- 4.10 Given the role played by the proposed strategic employment allocations (including Port Warrington) and that they are responding to specific growth opportunities rather than satisfying locally defined demand, it is important that the Local Plan also continues to recognise and reflect the scale of need for employment land meeting more localised demand and plans separately for this.
- 4.11 The strategic employment proposals outlined above collectively account for 235 ha of the proposed employment land requirement of 381 ha. This means that only 146 ha of land will be made available to meet the defined localised need of 203.31 ha as outlined in paragraph 4.9 above. It would appear that the PDO does not propose the allocation of sufficient land to meet this aspect of the Borough's employment land requirement.
- 4.12 It is therefore necessary for the Local Plan to allocate additional land to meet localised employment land requirements. A further suggested site which would be capable of meeting some of this additional requirement (land at Statham Meadows) is suggested by Peel as part of this representation. This is considered further in section 9.

²¹ The ‘Functional Economic Market Area’ defined in the Economic Development Needs Study as Warrington, Wigan, Trafford, Salford, Cheshire West and Chester, Cheshire East, Halton and St Helens.

²² Warrington Economic Development Needs Study (October 2016) para xii

²³ Policy CS11 Warrington Core Strategy (July 2014)

Safeguarded land requirement

- 4.13 Applying the same approach to safeguarded land for future employment use as that set out above in section 3 in respect of residential development, would increase the requirement for safeguarded land for employment purposes to 173 ha compared to 76.20 ha as currently proposed. This calculation is shown in table 3.2 below.

Table 4.1: Safeguarding requirement – employment land

Safeguarding requirement – employment	
Employment land per annum	15.24 ha
16 year requirement	244 ha
Total land requirement assuming 71% in the Green Belt	173 ha

5. Securing a sustainable future for Warrington's Outlying Settlements

Strategic Objectives of the PDO

- 5.1 The PDO confirms that the existing Strategic Objectives of the Core Strategy form the starting point in determining Strategic Objectives for the Local Plan Review. It is reported that these have been updated to take account of changing circumstances and requirements, most notably embedding New City into the Local Plan and the increased housing and employment development requirements.
- 5.2 Policy W1 relates to the realisation of New City. To the extent that it seeks to secure *'the strengthening of existing neighbourhoods'*, this is very much framed in the context of New City. Indeed, in appraising Spatial Options against this objective, the Council has assumed that this aspiration relates only to the town of Warrington and development elsewhere does not make a positive contribution to this objective.
- 5.3 As a result, the Strategic Objectives of the PDO and the manner in which they have been applied by the Council in appraising Spatial Options make no provision for securing a sustainable future for Outlying Settlements. This contrasts to the Strategic Objective W1 of the existing Core Strategy which, whilst proposing a significantly lower level of development, refers to the 'strengthening existing neighbourhoods' in general terms rather than in the context of New City. This objective therefore applied to the Borough as a whole, and all settlements within it, including the Outlying Settlements.
- 5.4 The Local Plan would therefore benefit from a further Strategic Objective as follows:

To ensure the future sustainability and viability of the outlying settlements of the Borough as attractive places to live and which meet the needs of their residents through the provision of a range of good quality housing and viable and sustainable service provision

- 5.5 It is assumed that the Council retains a general aspiration to strengthen all existing neighbourhoods, including those of the Outlying Settlements, as reflected in the existing Core Strategy Objective W1. The additional proposed Strategic Objective would reflect that position.

Meeting the needs of the Outlying Settlements

- 5.6 The National Planning Policy Framework (NPPF) makes clear that the planning system should contribute towards delivering development which is economically, socially and environmentally sustainable. Providing a supply of housing which is sufficient to meet present and future needs is integral to the social dimension of sustainable development, which seeks to support strong, vibrant and healthy communities²⁴.

²⁴ DCLG (2012) National Planning Policy Framework, para 7

5.7 The Government has signalled its intention to update the NPPF to address the ‘need to build many more houses, of the type people want to live in, in the places they want to live’²⁵. The Housing White Paper notes that:

*“There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people”*²⁶

5.8 Changes to the NPPF are also expected to require local authorities to identify ‘opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up’²⁷. Views were sought by Government on whether a standard methodology for assessing housing needs at neighbourhood level could be developed, with a view to ensuring that Local Plans and Neighbourhood Plans address their local need for housing²⁸. This evidently continues to recognise the importance of understanding local housing needs, and indeed the High Court has expressly distinguished between the local needs of villages and their environs and the wider needs of a local authority²⁹.

5.9 The Government’s current consultation ‘*Planning for the right homes in the right places*’ presents proposals to amend national policy so that local planning authorities are expected to provide neighbourhood planning groups with a housing need figure. The consultation document states:

*“We propose to make clear in planning guidance that authorities may do this by making a reasoned judgement based on the settlement strategy and housing allocations in their plan, so long as the local plan provides a sufficiently up-to-date basis to do so (including situations where an emerging local plan is close to adoption).”*³⁰

5.10 Ensuring that the local need for housing is fully considered and met through a ‘settlement strategy’ is therefore a factor which should strongly feature in establishing an appropriate spatial distribution of development through the preparation of a Local Plan.

5.11 Peel has previously submitted representations to the Local Plan highlighted the lasting adverse impacts of not providing for sufficient housing growth within the Outlying Settlements on their potential long-term sustainability.

5.12 The local need for housing, or securing a sustainable future for the Outlying Settlements, does not feature within the criteria used to evaluate the growth scenarios as noted above. On this basis, from the Council’s approach and published evidence

²⁵ DCLG (2017) Fixing our Broken Housing Market – the housing white paper, foreword from the Prime Minister

²⁶ Ibid, para A.54

²⁷ Ibid, para 1.33

²⁸ Ibid, para A.65

²⁹ East Bergholt Parish Council v Babergh District Council [2016] EWHC 3400 (Admin)

³⁰ DCLG (2017) Planning for the right homes in the right places: consultation proposals, Paragraph 96

there is no indication that the development needs of the Borough's Outlying Settlements have been taken into account in appraising the Spatial Options, a significant omission.

- 5.13 The interim Sustainability Appraisal³¹ (SA) commissioned by the Council includes some appreciation of the benefits associated with a more distributed development pattern, albeit these do not feature elsewhere in the Council's evidence base or indeed in the consultation document, nor does the assessment criteria provide an appropriate framework to allow these considerations to be given due weight in assessing the various Spatial Options.
- 5.14 The technical basis for this assessment is also unclear, with the SA outlining an intention to assess the '*extent to which...development will help to meet housing needs*' but consistently indicating that '*due to incomplete data, sites have not been assessed against this criterion*'³².
- 5.15 The SA does acknowledge that a focus only on the urban area of Warrington 'would not help to maintain the vitality and viability of services, facilities and businesses in the outer settlements, which could have negative implications for these areas' in relation to local spending and demand for public transport³³. It is noted that providing new market and affordable homes in settlements would benefit 'people that wish to stay in the settlement but are struggling to afford a home there'³⁴, and restricting delivery of housing in outlying settlements could indeed 'affect affordability and choice' in these areas³⁵.
- 5.16 The SA suggests that incremental growth in settlements 'ought to help deliver 'local housing needs' in a number of settlements across the borough', which 'should help to ensure that there is a greater choice of housing overall and that affordability issues are potentially tackled where needed'³⁶. Nevertheless, it is acknowledged that an increased dispersal of growth – beyond the incremental growth option preferred by the Council – could have further positive effects by helping to improve affordability. These various recognitions are welcomed however they have not been taken forward to inform the PDO proposals. This will need to be addressed in the full Draft version of the Local Plan.
- 5.17 In preferring an approach which enables 'incremental growth' in the outlying settlements the Council applies an arbitrary cap which constrains the growth of outlying settlements to 10% of their existing size. This is underpinned by a development trajectory and spatial strategy which directs only circa 6% of housing development towards the outlying settlements over the plan period.
- 5.18 This contrasts notably with the current spatial distribution of the population in Warrington, with the 2011 Census finding that almost 14% of the borough's residents live in outlying settlements.

³¹ AECOM (July 2017) Warrington Local Plan Review Sustainability Appraisal: Interim SA Report

³² AECOM (July 2017) Warrington Local Plan Review Sustainability Appraisal (Interim Report) – Technical Appendix A: Site Proformas

³³ AECOM (July 2017) Warrington Local Plan Review Sustainability Appraisal: Interim SA Report, page 48

³⁴ Ibid, page 49

³⁵ Ibid, page 55

³⁶ Ibid, page 55

- 5.19 The Government has re-affirmed the importance of Local Plans providing a clear steer as to the spatial distribution of housing needs. Where a strategy is not set out in a Local Plan the Government has proposed a formula-based approach towards disaggregating authorities' housing needs based on the proportionate distribution of the existing population. While this remains only an illustrative '*starting point*', in the case of Warrington such an approach implies a need for at least 3,000 dwellings in the outlying settlements over the plan period based on the provision of 1,113 homes per annum across the borough. Under the high-growth scenario this translates into a need for in excess of 3,600 homes.
- 5.20 Even at the lower end of this range the implied provision of housing within the outlying settlements is more than double the level of provision proposed in these settlements. This is mirrored at individual settlement level, with the proposed level of provision almost uniformly less than half that which would be required based on a proportionate population-based distribution. This indicates that the level of development allocated to these settlements based on even this comparatively simplistic approach would fall short of enabling settlements to grow in 'baseline' terms.
- 5.21 This is considered an important illustration of a baseline or '*starting point*' for considering the potential distribution of needs in Warrington's outlying settlements, and should be favoured in informing a policy-based approach to distribute provision over an arbitrary cap on settlements' future growth.
- 5.22 Whilst this provides an important starting point it is considered that such a formula-based approach does, however, not take sufficient account of the specific needs of individual settlements, which should also be taken into account in devising a sustainable development strategy.
- 5.23 Peel has built upon its analysis of the indicators of need in each of the outlying settlements in Appendix 1 of this report. The analysis has identified the distinct characteristics of the borough's outlying settlements, in terms of their size, socio-economic profile, historic development and respective role in providing community infrastructure.
- 5.24 The distinctive nature of the individual settlements is clearly illustrated when looking at just a few of these indicators, as shown below.

Table 5.1: Settlement Distinctions – Key Indicators

	New build sales 2007 – 2016	Average price paid 2016	Residents aged 16 to 64 2011	Workplace population 2011	Provision of community facilities
Burtonwood	0	£141,688	60%	651	Moderate
Croft	0	£269,614	59%	193	Limited
Culcheth	21	£271,800	58%	1,682	High
Glazebury	10	£187,179	64%	693	Limited
Hollins Green	4	£169,177	64%	275	Limited

Lymm	144	£341,877	61%	2,013	High
Winwick	1	£281,066	63%	248	Limited

Source: Turley analysis

- 5.25 It is evident that historically there has been a very limited level of new housing provided in the outlying settlements, with Lymm the only settlement where there has been any notable level of new housing provided in recent years. The outlying settlements generally demonstrate a population profile which is more skewed towards older age groups. The low levels of development have served to exacerbate this issue with this particularly evident in Culcheth, Croft and Burtonwood which have all seen their core working-age groups (16 – 64) fall notably over recent years.
- 5.26 A failure to positively address this issue in these settlements will only serve to reinforce this demographic structure over the Plan period. This will have local implications for the vitality and vibrancy of settlements as well as their local business base and economy.
- 5.27 The comparative shortage of new housing provision has compounded the high market demand of these settlements which has manifested itself in comparatively high house prices across many of the settlements, particularly in Lymm, Culcheth, Croft and Winwick. This will continue to have adverse implications for younger households in particular looking to remain within these settlements therefore in a number of cases further compounding the changing demographic profile.
- 5.28 It is considered that the Council should fundamentally re-visit its approach to allocating housing provision to the outlying settlements. This should adopt a starting point, in accordance with emerging DCLG guidance, which recognises the current spatial distribution of communities across the authority. This would imply the need to plan for a minimum level of need in the region of 3,000 dwellings.
- 5.29 This level of need, however, fails to fully account for the more locally specific drivers of need and the scale of growth required to address the implications of historic under-provision and future drivers of demand and is subsequently unlikely to address respective challenges influencing their vitality and viability in future over the plan period and beyond. Such an approach can have lasting adverse impacts, as previously highlighted.
- 5.30 In reviewing its Local Plan, it is considered that the Council should comprehensively assess the development needs of each of its Outlying Settlements, and seek to address these needs in progressing the Local Plan. The evidence presented in the accompanying appendix is intended to assist the Council in considering these issues. It is considered that this highlights that, in particular for the northern outlying settlements, there is clear evidence as to the adverse consequences of failing historically to bring forward a sufficient number and choice of housing. A more sustainable distribution of growth should seek to plan for above the baseline ‘minimum’ level of need to ensure their future vibrancy and vitality. This also needs to be considered in the context of the wider strategic economic objectives of the Plan as considered below.

The role of the Outlying Settlements in delivering New City

- 5.31 As set out above, Peel is fully supportive of the New City aspiration and recognises the potential this has to deliver a sustainable future for Warrington. It is right that the Local Plan seeks to provide the spatial articulation of this. This very clearly requires a critical mass of development to be directed to the main urban area of the Borough.
- 5.32 However, realising New City will be dependent on all areas of the Borough being viable, attractive places to live and work, offering choice and accessibility for existing and incoming residents, with the core of the city supported by strong and sustainable supporting settlements. This is key part of the critical infrastructure needed for Warrington's economic aspirations to be realised, providing diverse housing options for an economically active population and complementary the housing offer available in Warrington itself.
- 5.33 In this regard Peel would question the Council's approach to appraising the contribution to New City made by different Spatial Options, which in effect, assumes that any growth taking place beyond Warrington will not contribute to the realisation of New City.
- 5.34 For the reasons outlined above, Peel would encourage the Council to reconsider the potential for growth outside of Warrington to contribute positively to New City and to reflect this in the further reappraisal of Spatial Options.

The economic geography of Warrington - providing for the north of the Borough

- 5.35 It is also important that the plan considers and is informed by an appreciation of the economic geography of Warrington as existing. Whilst Warrington Town Centre is an economic centre, there are number of dispersed economic drivers within the Borough, including Birchwood Park and Omega in the north of the Borough. Moreover, the Borough's strategic connections with surrounding Local Authority areas, not least Liverpool and Manchester accessed via the M62 should be considered. These assets reflect the Borough's economic footprint. This will change overtime through the delivery of New City but this is an evolutionary process and the existing key economic assets of the Borough will continue to be drivers of the economy in the long term.
- 5.36 These assets have a significant bearing on travel and commuting patterns across Warrington and will continue to do so in the future, including in the context of the growth and expansion of the economic role of the town/city centre. Regard must be had to the natural pull of these assets in considering where to locate development and what represents a sustainable spatial strategy. This is particularly important in considering the benefits of various Spatial Options against Strategic Objective W4 and particularly the desire to *'reduce congestion and promote sustainable transport options, whilst reducing the need to travel.'*
- 5.37 The appraisal of the high level growth options presented in Appendix 1 of Area Profiles and Options Assessment Technical Note (July 2017) restricts the consideration of the accessibility aspects Strategic Objective 4 to public transport provision and the capacity of the road network (local and strategic) to accommodate growth. There is no

consideration of the travel benefits of distributing residential development according to the existing spatial distribution of key employment areas and strategic road connections which generate significant levels of travel. Such benefits may be in reducing the length of car journeys, improving the viability of bus services serving key employment or reducing pressure on roads used by commuters to access the M62.

- 5.38 This is carried forward into the appraisal set out in the Settlement Profiles – Outlying Settlements Paper (July 2017) which, in appraising the various growth options in Culcheth for example, makes no reference to its location in relation to Junction 11 of the M62 and Birchwood Park employment area, both of which are less than 2km to the south of the settlement. Again this is a reflection of the manner in which the appraisal assesses the various options against Objective W4.
- 5.39 Greater co-location of housing and existing employment and infrastructure assets, including directing an appropriate proportion of future housing growth to the north of the Borough, would make a significant positive contribution to Strategic Objective 4 of the PDO. Peel would encourage the Council to give this matter due weight in further considering the Spatial Options and allocation of sites through the progression of the Local Plan.

6. Infrastructure capacity in Outlying Settlements

- 6.1 This section of the representations provide comments on the Council's approach to appraising the infrastructure and landscape capacity constraints affecting the Outlying Settlements, principally set out in the Settlement Profiles – Outlying Settlements Paper (July 2017).
- 6.2 Peel recognises the issues associated with growing the Outlying Settlements of the Borough and the need to address infrastructure capacity constraints arising from this. It is also noted that there may be existing infrastructure issues in these settlements which exist irrespective of any planned growth. Carefully planned development offers the opportunity to respond positively to these constraints. This can mean that new infrastructure to serve development can also help address existing issues and so providing benefits to the wider community and local area. Indeed, this principle is part of the justification for growth to the south of Warrington proposed as part of the PDO. It should apply equally to the Outlying Settlements..
- 6.3 Furthermore, the various constraints affecting the Outlying Settlements will not be the same in each case and some will have a greater capacity to grow than others. In this regard, it is important that the Council undertakes bespoke assessments of each settlement and the opportunities and constraints which each presents with respect to its future growth. A universal cap of 10% as proposed may not represent the most sustainable approach. The Outlying Settlements clearly do not have to accommodate the same proportionate level of development rather the Local Plan should determine a bespoke figure for each based on an appropriate scale and an appreciation of that settlement's constraints and opportunities. At this stage it would appear that the Council has considered only consistent levels of growth for all settlements (e.g. incremental growth for all or sustainable settlement expansion for all).
- 6.4 This is considered in more detail below.

Education capacity and expansion potential

Capacity constraints

- 6.5 The PDO highlights existing infrastructure capacity constraints as an issue for the Outlying Settlements. Table 7 specifically refers to secondary school capacity in this regard. The Settlement Profiles – Outlying Settlements Paper (July 2017) refers extensively to secondary school capacity constraints affecting the outlying settlements and notes that there is limited expansion potential.
- 6.6 In appraising Spatial Option 3, Appendix 1 of Area Profiles and Options Assessment Technical Note (July 2017) notes that none of the settlement extensions being considered would be of sufficient size to deliver a new secondary school. The inference is that a critical mass of residential development on a single site, or a willing landowner, is needed to secure the increase in secondary school capacity required to overcome this constraint.

- 6.7 Peel has considered the primary and secondary school capacity position within the Outlying Settlements of the Borough and its detailed representations on this matter are provided in the separate report at Appendix 2.
- 6.8 The analysis presented specifically considers the methods and conclusions relating to school capacity in the outlying settlements.
- 6.9 The Council acknowledges a number of factors affecting education supply and provision in appraising the spatial options but does not present any data or analysis to demonstrate that these have been taken into account in considering what scale of development is achievable in the Outlying Settlements. For example:
- The relationship with nearby secondary schools has not been fully considered (see Issue 1, page 17 of Appendix 2) – the secondary schools considered in Warrington Borough Council’s analysis in relation to the settlements taken into account in the analysis were Culcheth High School and Lymm High School. There are a further three secondary schools in Salford, Trafford and Wigan authorities which have not been considered by the Council but which are situated within the Department for Education’s recommended maximum secondary school distance (3 miles). Capacity at these schools and the relationship with Warrington geographies should be taken into account;
 - Pupils travelling from surrounding local authorities are not acknowledged in the Area Profiles which inform the Preferred Development Option (see Issue 2, page 18 of Appendix 2) – this is particularly important in relation to Culcheth High School which has a strong catchment relationship with both Wigan and Salford authority areas. Clearly new development within the outlying settlements will increase demand for school places, however the secondary schools considered are already drawing pupils from a significantly wider area than the host settlement alone (including adjacent Local Authority areas). Increased demand for places at these schools arising from new residential development in close proximity may shrink the catchment areas of these schools, directing future pupils to more local schools in Salford and Wigan. It is unlikely that any such shrinkage would be to the extent that local pupils living within and near to the host settlement cannot secure places given that they are pulling from a very wider area at present, though clearly this would need to be subject to further testing to establish the ‘tipping point’ in this regard;
 - Warrington Borough Council indicates that there will be a release of secondary place pressure in Outlying Settlements as a result of two new secondary schools proposed for the urban area. This is not explored by the Council in informing its conclusions; and
 - The relationship between Central Warrington and Lymm is not explored fully (see Issue 3, page 20 of Appendix 2) – a high number of pupils attend Lymm High School and live within the main urban area. Warrington Borough Council has acknowledged this relationship indirectly in its assumption that provision of new secondary schools within the urban area will have a knock on effect on schools elsewhere and ‘*help alleviate some of this pressure*’ (see Table 2.4). However, the Council has not presented any data or analysis into the impacts

and resulting school places made available in schools such as Lymm High School.

- 6.10 The analysis at Appendix 2 demonstrates that school demand under the 'incremental growth' option proposed cannot be met through existing school provision (see paragraph 4.16). The Council indicates that new provision in the urban centre will '*alleviate some of this pressure*' (see Table 2.4). However, our analysis shows that Culcheth High School operates quite separately from the urban centre and draws pupils from elsewhere. Therefore, any new provision in the urban centre is unlikely to have a material impact on the level of demand for places at Culcheth.
- 6.11 Ultimately the 10% growth under the PDO does not reflect the heterogeneous nature of school catchments and the factors which influence them. The analysis indicates that a more appropriate approach would be to reflect each geography individually, taking into account their specific catchments and other influencing factors as described under the first point previously.
- 6.12 The analysis presented at Appendix 2 makes the following conclusions:
- **The incremental growth option simply delays the need to address secondary school capacity issues at Lymm and Culcheth High School** – The assumption behind the incremental growth option is that development can largely be accommodated in existing infrastructure. However, given the current capacity issues a wider consideration of secondary school capacity of Lymm High School and Culcheth High School is needed. Each school has unique demand pressures which need to be considered;
 - **Additional growth in the Outlying Settlements beyond that planned could generate demand for a new school when considered on a cumulative basis** – Higher housing growth in Culcheth, Croft or Glazebury could justify and potentially fund an additional smaller secondary school to support Culcheth High School and serving the northern settlements of the Borough. Indeed the level of growth needed to support a primary school was used to define the sustainable settlement extension growth option. A review should involve Salford and Wigan to understand changes in these areas as some of the pupils attend from outside of the Borough.
 - **The Local Plan Review presents an opportunity to think more strategically about school capacity** – Currently the evidence base is limited as infrastructure is considered by settlement and is reactive to housing growth scenarios. A quality school system is integral to the long term growth ambitions of Warrington. Undertaking a full and integrated review of school capacity across the whole borough, drawing on the specific catchments and influencing factors, will ensure that the Council base any growth decisions on robust information; and
 - **School capacity should not be a limiting factor to housing growth** – Meeting housing need should be the first consideration. This can subsequently "unlock" key strategic education facilities. For example, land and funding through Section 106 obligations. School infrastructure should not be considered as a barrier to growth.

The need to consider proposed developer solutions

- 6.13 More generally, it is noted that the appraisal of education capacity constraints and expansion potential has been undertaken without consideration of proposals put forward by developers as part of call for sites exercises. That is to say that land owners and developers may be able to offer onsite solutions to realise the necessary increase in school capacity, notwithstanding that it may be the case that no individual site would ordinarily be deemed to be sufficient in size to warrant an onsite secondary school. The mitigation options and means of expanding the capacity of school infrastructure to enable residential development to be sustainably delivered in the Outlying Settlements require further exploration by the Council. Higher growth options have potentially been dismissed .
- 6.14 In considering this issue further, it should be noted that Peel has put forward specific on site solutions to deliver increased primary and secondary school capacity through its proposals at North West Croft and Rushgreen Road, Lymm. Peel would request that the Council give further consideration to these proposals in reappraising the Spatial Options.

Potential to expand existing schools

- 6.15 The Settlement Profiles – Outlying Settlements (July 2017) paper comments on the potential to extend existing schools to deliver additional capacity which may be required. In most cases, the paper records that the potential for expansion is ‘none – site constrained’; ‘difficult’; or ‘limited.’
- 6.16 Notwithstanding the need for a more considered appraisal of future school capacity in the Borough as advocated above, Peel considers that a number of schools serving the Outlying Settlements do have expansion potential and could accommodate the additional demand generated by higher levels of residential growth. Selected schools are considered below to illustrate this:
- **Culcheth High School** – the Outlying Settlements paper records that there is no potential for the school to be expanded due to ‘site constraints and HSE exclusion zones’. It is noted that the site falls partly within the outer HSE Consultation Zone in relation to the high pressure gas main running north to south along the eastern side of Culcheth. This is illustrated through Figure 6.1 below which shows Culcheth High School in the context of the HSE Consultation Zones, alongside Peel’s proposed development for land north east of Culcheth. It also shows an area for the potential expansion of Culcheth High School utilising existing playing pitches which could be reprovided as part of the development proposal put forward by Peel



Figure 6.1: Culcheth High School and Peel’s development proposals to the North East of Culcheth in relation to HSE consultation zones

Culcheth High Schools falls entirely outside of the safeguarding zones associated with the HSE explosives licence at Orica’s Glazebury depot located to the north of Culcheth.

The HSE’s Land Use Planning Methodology document provides guidance on what types of development are restricted within HSE consultation zones. In respect of development within the defined Inner, Middle or Outer Zone, the HSE will provide the Local Authority with one of two responses when consulted on development proposals – either ‘Advise against’ or ‘Do not advise against.’

A series of tables are presented in the guidance which outline how the HSE will respond in the context of different development scenarios. Schools come under category DT3.1 – Institutional Accommodation and Education. Table 3 of the guidance notes that such facilities are a **Level 3** category development, unless the planning application boundary for such a proposal is more than 1.4 ha in size, in which case such facilities are a **Level 4** category development.

The decision matrix at paragraph 35 of the Guidance notes that a ‘do not advise against’ response is provided by the HSE in respect of Level 3 development (i.e. school proposals on sites of less than 1.4 ha) within an Outer Zone. An ‘advise against’ response is provided in respect of Level 4 development within an Outer Zone.

A two form entry expansion of Culcheth High School (c 300 pupils) could reasonably be accommodated on a site of less than 1.4 ha in size, thereby generating a 'do not advise against' response from the HSE.

In the alternative, such an expansion could be kept entirely outside of the HSE consultation zones, and thereby not constrained by the 1.4 ha site size restriction, by building an extension within the western part of the site.

Whilst the existing site is substantially utilised as playing pitches (of which there are eight on site, including two artificial pitches) and therefore in use, there is the potential to rationalise the site by developing one of the playing pitches and upgrading one or more of the remaining pitches to a synthetic surface increasing their usability and capacity or through providing replacement pitches as part of Peel's development proposals for land to the North East of Culcheth and adjacent to Culcheth High School. In respect of the former option, Sport England guidance notes that a well maintained grass pitch can typically be used for seven hours per week whilst a good quality synthetic pitch can be used for 70 hours per week.³⁷

- **Lymm High School** – the Outlying Settlements paper records that the expansion potential of Lymm High School is 'poor'. Lymm High School occupies a site area of approximately 16 ha. It provides eleven playing pitches of various sizes, plus a separate athletics area and cricket pitch. The site provides an estimated 5ha more non-building space than the Government's guidance for new secondary schools based on a 10 form entry school.³⁸ The site is therefore oversized relative to the site of the school and its capacity.

Lymm High School presents an inefficient layout and there may be scope to rationalise the site and increase capacity within the confines of the built area of the site. If this is not possible then the developable of some of the existing playing pitches would be a viable option, potentially off set by investments in the retained pitches to improve their quality, including through upgrading one or more to a synthetic surface.

6.17 Whilst the scope to deliver additional primary school capacity through 'on site provision' (i.e. part of residential development proposals) is greater and so the existing constrained capacity position is given less weight by the Council in appraising the Spatial Options, it is helpful to also consider options for extending existing primary schools in selected settlements.

- **Outrington Community Primary School** – Peel's proposals for land off Rushgreen Road in Lymm as set out in the revised Development Prospectus prepared for this site make provision for a 0.6 ha expansion of the existing school capable of achieving a 1 FE increase in its capacity to enable a higher level of residential growth to come forward in Lymm.

³⁷ <https://www.sportengland.org/media/4536/artificial-surfaces-for-outdoor-sports-2013.pdf>

³⁸ Building Bulletin 98: Briefing Framework for Secondary School Projects (Department for Education and Skills)

- **St Lewis Catholic Primary School** - the Outlying Settlements paper records that the expansion potential of St Lewis Catholic Primary School is 'difficult'. St Lewis sits within a site which extends to approximately 1.5 ha, including open areas and playing fields to the rear of the main school building. The existing site is larger than the Government's guidance for new primary schools for a 1 form entry facility (1.049 ha to 1.151 ha) though is marginally smaller than the guidance for a 2 form entry facility (1.778 ha to 1.952 ha)³⁹. These are a guide only and modern schools are built on substantially smaller sites. Indeed, Government guidance notes that a 'confined site' a 2 form entry primary school may be provided on a site of between 0.46 ha and 0.55 ha. In the case of St Lewis, an extension may be capable of being provided through adding an extra floor to the existing single storey building, therefore avoiding the loss of surrounding playing pitches. Such approaches have been commonly taken in other authority areas.
- **Culcheth Community Primary School** – As with Culcheth High School, Culcheth Community Primary School also falls within the Outer HSE consultation zone relating to the high pressure gas main to the east of Culcheth. The same HSE guidance summarised above applies to primary schools. As such, an extension to Culcheth Community Primary School utilising a site area of less than 1.4 ha would be an acceptable form of development within the Outer HSE Zone.

It is noted that this school occupies a site of approximately 1.7 ha, the approximate minimum size recommended by the Government for a 2 form entry school. Culcheth Community Primary school is presented a 1 form entry school so the site is substantially oversized for its current capacity. The site can be consolidated to increase capacity to a 2 form entry facility. This might include developing the unused open area of land fronting Warrington Road for example.

Highway capacity considerations

- 6.18 Whilst not stated as a main reason for selecting the preferred Spatial Option, the PDO and supporting evidence base does consider the transport impacts and constraints associated with various levels of growth within the Outlying Settlements.
- 6.19 At this stage, the four-stage process adopted by the Council to derive the PDO does not appear to take account of any numerical analysis of the transport system that would result in a necessary 10% cap on the growth of the Outlying Settlements as is proposed. Figure 2 of the PDO document outlines the process in arriving at a preferred option. Stage 3 of this involves a consideration of the capacity of the Outlying Settlements to grow. The PDO states that Stage 3 included a 'Transport Review'. Further detail is given at 4.46 and 4.47 of PDO document, noting:

"In order to help inform the options appraisal process, the Council

³⁹ Building Bulletin 99: Briefing Framework for Primary School Projects (Department for Education and Skills)

prepared Area Profiles for... each of the outlying settlements” (4.46)

and

“these profiles provide a detailed assessment of the capacity of... the transport network.” (4.47)

- 6.20 Examination of the area profile for Croft, for example, includes consideration of the assessment criteria for objective W4, noting:

“Local Highways Network. Small amount of peak hour congestion in centre of village. No planned local highways improvements in village.”

- 6.21 Other criteria related to the strategic highways network, public transport and active travel do not raise specific constraints in respect of Croft.
- 6.22 At this stage, Peel would question whether sufficient robust testing of the various Spatial Options has been undertaken to enable a conclusion to be reached that, as a general rule, the existing highway network represents a constraint to the ability of these settlements to grow by more than 10%.
- 6.23 It is understood that the transport review did not include any quantitative analysis. No analysis of the capacity of the existing transport system, the impacts of traffic generated by development and the potential to introduce improvements to facilitate growth has been undertaken. Indeed, the PDO notes (at paragraph 5.49) that the development numbers in each settlement will depend on detailed assessment including transport impacts. It is understood this will be undertaken with the Council’s new traffic model which is not yet available.
- 6.24 The evidential basis relating to transport capacity is not currently sufficient to support the conclusion that existing highway constraints are such that the Outlying Settlements cannot sustainably grow by more than 10%.
- 6.25 Further, no obvious consideration has yet been given to the ability of development proposals being promoted to address existing transport issues, such as through funding improvements to the road infrastructure to reduce congestion or supporting the sustainability of existing or funding new bus services. Selected growth of settlements could provide significant transport benefits which need to be considered further in developing the Local Plan.

Landscape and character considerations

- 6.26 It is suggested through the PDO document that restricting the growth of the Outlying Settlements to 10% will ensure that their character and landscape is protected. The protection of character is given as reason for not proceeding with Spatial Option 3 in Table 7 of the PDO document. Further, in considering a more dispersed distribution of future residential development, the Sustainability Appraisal notes that:

This could have a significant negative effect on particular settlements, as none would be unaffected by such a scale of development. In particular, the

*settlements of Lymm and Outrightington, Croft and Hollins Green could be negatively affected.*⁴⁰

6.27 These conclusions are not supported by any up-to-date substantive evidence (being informed by the Warrington Landscape Character Assessment 2007) published as part of the development of the Local Plan. Peel would therefore question the justification for the conclusions drawn in selecting the PDO. Moreover, the capacity different settlements to grow whilst ensuring their character and landscape is protected will inevitably vary. In this regard the application of an arbitrary 10% cap on growth within each Outlying Settlement, as the common upper capacity limit to ensure landscape and character are protected, is similarly not justified.

6.28 The updated Development Prospectuses submitted by Peel as part of these representations include a technical appendix which considers the constraints affecting each proposed development site put forward by Peel for allocation through the Local Plan. This includes a Landscape Sensitivity Assessment undertaken by Randall Thorp. Within this is an initial analysis of each Outlying Settlement within which Peel is proposing development and the capacity of surrounding landscape to accommodate development (susceptibility to change). This is presented to assist the Council in further considering the scope for growth in the Outlying Settlements and the extent to which each can accommodate growth whilst preserving its character and landscape setting.

6.29 In respect of Culcheth, for example, the appraisal sets out the following (all quotes are taken from the Warrington Landscape Character Assessment 2007):

- **Landscape Quality (Condition):** The landscape surrounding Culcheth is primarily agricultural. To the north, east and west *agriculture predominantly consists of arable fields, intensely cropped, with poorly maintained remnant hedgerows with few hedgerow trees. Small deciduous woodlands form backdrops to views within the landscape.* To the south the landscape consists of a mixture of arable farmland with areas of mossland woodland. The condition and *“function of the arable land is totally dependent upon drainage and water level management.”* The character and condition of the settlement of Culcheth is described as being: *“augmented by a series of conventional private housing estates of low architectural merit, many interconnected through a maze of loop roads. The village is sited on a generally gently north sloping area of undulating land.”* Culcheth is considered to be a *“particular example of poorly-planned housing estate expansion.”*
- **Scenic Quality:** The *“intensely cropped”* agricultural landscape is not renowned for its scenic quality due to its openness and the presence of major transport corridors. The woodlands to the north east of Culcheth *“help to create backdrops and form a more interesting landscape, breaking down the long, interrupted views”* providing attractive landscape features and some scenic quality in places. The scenic quality of the landscape to the south east of

⁴⁰ Warrington Local Plan Review Sustainability Appraisal: Interim SA Report Appendix B (July 2017)

Culcheth is in its “open and exposed” nature and “expansive views towards the Pennines.”

- **Rarity:** There are no elements within the landscape to the west, north and east of the Study Area that are considered to be rare. Holcroft Moss in the very south east of the Study Area is “a relatively small area of woodland, scrub and rough grassland. It represents the only area of lowland bog in Cheshire which has not been cut for peat.” Intact lowland raised bogs are “one of the rarest and most threatened habitats in Europe.” The field patterns of parts of the landscape immediately surrounding the settlement of Croft have shown little change over time, the retention of “the core of an old agricultural landscape is extremely rare within the Borough and a significant asset worthy of retention.”
- **Representativeness:** The majority of the study area is representative of an agricultural landscape with an irregular field pattern and some areas of woodland. Aside from Holcroft Moss lowland bog, and the small scale historic field pattern closely associated with the settlement of Croft, the landscape of the Study Area does not contain elements which are considered to be particularly important examples
- **Conservation Interests:** There are a number of listed buildings within the Study Area. The Culcheth (Former Newchurch Hospital) Conservation Area is located in the western part of Culcheth and consists of a group of houses set around an oval driveway within a mature wooded setting. Larger more institutional buildings are located in the eastern part of the conservation area, next to Twiss Green Lane and include a former school and hospital annex, administrative and workshop buildings, and a dominant water tower. With the exception of the water tower, which is visible from Twiss Green Lane and the surrounding landscape, the buildings within this conservation area are surrounded by existing residential properties of Culcheth. There is a high conservation interest within the south eastern part of the Study Area with the lowland bogs of Holcroft Moss classified as a SSSI. There is local conservation interest in the three Local Wildlife Sites near to Culcheth and some trees to the north east of Culcheth which are protected by Tree Preservation Orders
- **Recreation Value:** There is an extensive Public Right of Way network within the landscape around Culcheth, including Culcheth Linear Park, which is located on the former railway line around the southern boundary of Culcheth. Leigh Golf Club is located immediately north west of Culcheth and there are formal sports pitches located around Shaw Street and associated with schools on the eastern edge of the settlement.
- **Perceptual Aspects:** The A580, M62 and M6 are associated with this Study Area, along with the Manchester to Liverpool railway line and the settlements of Culcheth and Winwick. It is therefore not valued for any wildness or tranquil qualities. The landscape to the south east has “sweeping long distance views in all directions.”
- **Associations:** There are no known associations of the Character Area with any published art, literature or folklore which would add to its landscape value.

- 6.30 Based on the above considerations, the appraisal notes that landscape value of the Culcheth area is **Medium**, due to the presence of major transport corridors, and existing settlements within the Study Area, coupled with the “intensely cropped” arable farmland forming the majority of the landscape. The susceptibility to change of the landscape surrounding Culcheth within the Study Area is considered to be **Low**.
- 6.31 There is nothing to indicate that there is anything about the character of Study Area, which should be considered remarkable or out of the ordinary, with the exception of Holcroft Moss in the very south east of the Study Area, which is a national conservation interest. The Study Area identifies some features of value that are site specific and would be subject to further assessment or mitigation measures.
- 6.32 Moreover, the issue of impact on the character of each settlement must have regard to the development proposals which may provide that growth. Some sites are inevitably more sensitive than others in this regard, whilst it may be possible to design schemes to mitigate any such impact on the character of the settlements.
- 6.33 It is apparent that the Council has made a number of generalisations about the impact of development on individual settlements, their character and the surrounding landscaping, which are not, at this stage substantiated by reference to any robust evidence of impact. Very clearly such impacts could arise but the capacity of Outlying Settlements to accommodate growth will vary. Given that significant weight is evidently been placed on assumed impacts on ‘character’ as identified in Table 7 of the PDO document, Peel would encourage the Council to develop an evidence base which properly considers this matter.

7. Comments on additional evidence base

Updated Green Belt Assessment

General review following 2016 Regulation 18 consultation

- 7.1 Arup have undertaken further work to update the previously published Green Belt Assessment (2016) reflecting on representations received to the Scope and Contents consultation and the potential impact of HS2.
- 7.2 Following this review, it is noted that the reported contribution made by Green Belt Parcel LY16 in Lymm has been changed from 'moderate' to 'weak.' This is consistent with Peel's representations to the Scope and Contents consultation in 2016. This change is supported by Peel.
- 7.3 It is also noted that definition of Parcel HG5 in Hollins Green has been extended and now terminates at Warburton Bridge Road, which presents a more logical defensible boundary to the parcel. This has resulted in an amendment to the parcel's contribution to the Green Belt from 'moderate' to 'weak.' These changes are also consistent with Peel's representations to the Scope and Contents consultation in 2016 and are fully supported by Peel.

Implications of HS2 Safeguarding route

- 7.4 The Green Belt appraisal has been updated to reflect that the HS2 route through Warrington has now been safeguarded as a result of a direction provided by the Department of Transport in November 2016. As this would preclude the delivery of conflicting development within the safeguarded route, it is reported that sufficient certainty exists that this rail line will be delivered to enable it to be treated as a durable boundary for the purposes of the Green Belt Assessment and in defining parcels for assessment. This has implications for the Green Belt contribution of a number of parcels around Culcheth which are re-drawn and reappraised based on the HS2 line being in situ.
- 7.5 It is noted that based on this reappraisal, Green Belt parcels CH1, CH12, CH13 and CH15 are now identified as making a 'moderate contribution' to the Green Belt whereas they were previously deemed to make a 'strong contribution.'
- 7.6 For consistency, if rail lines (future and existing) around Culcheth are considered as an appropriate basis for defining parcels, then Peel considers that Parcels CH4, CH5 and CH6 located to the north of Culcheth between the northern edge of the settlement and the Liverpool-Manchester rail line should also be drawn to this firm and defensible boundary and appraised on this basis. This too would result in the contribution made by these parcels being reduced from 'strong' to 'moderate.' This is set out in detail in Peel's representations to the Scope and Contents document (December 2016).
- 7.7 Notwithstanding this, Peel would question whether a future potential rail line should be used to define and appraise Green Belt parcels in this way, particular as this will inform the selection of sites for release from the Green Belt and the rail line in question may not be delivered in the timeframe assumed.

- 7.8 Green Belt boundaries should be drawn based on physical boundaries which exist and which are therefore genuinely defensible. Whilst for the foreseeable future the HS2 route may be considered present a defensible boundary, it is its legal, rather than physical status which provides this defence. Its legal status may change and the prospect of this boundary disappearing clearly exists if HS2 is not delivered. It cannot be considered to be durable when taken in this context.
- 7.9 Paragraph 85 of the NPPF requires Green Belts to be drawn '*...using physical features that are readily recognisable and likely to be permanent.*' A non-physical boundary distinguishable only by its legal status and which would otherwise not exist in any form does not satisfy the above definition. This route should not be treated as a durable feature for the purposes of defining and appraisal Green Belt parcels. For this reason, Green Belt parcels CH1, CH12, CH13 and CH15 should continue to be identified as making a strong contribution to the Green Belt consistent with the 2016 Green Belt assessment until such time that the safeguarded route becomes a physical and permanent feature following construction of the HS2 line.

BNP Paribas Spatial Options Appraisal (SOA)

- 7.10 The SOA includes first stage viability analysis on schemes ranging from 500-6,000 units in order to establish the level of viable contributions towards on-site community infrastructure and major off-site infrastructure. A full appraisal of the SOA is provided at Appendix 3. This highlights the following key points:
- Due to the early stage of the assessment, the viability analysis has been carried out on a high level, 'light touch' basis, which may not provide a reliable basis for the assessment of infrastructure contributions;
 - Peel would request a full breakdown of scheme modelling assumptions (unit sizes, bed numbers and unit types) to ensure validity and, thereon, the reasonableness of the assessed conclusions;
 - Garages do not appear to have been included within the viability appraisals. Peel regard garage provision as essential, as exclusion will be substantially underestimate costs, and infrastructure contributions will be overestimated;
 - A phased approach to scheme delivery appears to have been adopted, but no details are provided. Without clarity, it is not possible to determine if the assumptions regarding build period, sales rate and basis of development are appropriate and reasonable/realistic;
 - Peel would question some of the assumptions made regarding certain development costs, and the lack of reference to abnormal costs, which must be assumed to be generated by any scheme, especially those of scale;
 - No evidence is provided to support the single £psf sales value which is adopted across the Local Authority area. Peel has some concerns regarding the lack of evidence and unreasoned 'coverall' approach, along with the sensitivity analysis which adds an unevidenced and unjustified 2% to sales values.

- Minimum land values are set at £210,000 per gross hectare. This falls below the value which are typically required to provide a competitive return to a land owner, thereby misrepresenting the revenue available for infrastructure provision and misinterpreting the relevant guidance;

7.11 Peel would request requests clarifications, corrections and the preparation of additional supporting viability evidence in respect of these matters to ensure the SOA provides a robust evidential basis on which to develop the Local Plan.

8. Addressing identified Local Plan deficiencies

8.1 The comments above have outlined Peel's support for the PDO's ambition and focus on delivering New City. Peel fully endorses a continued focused on delivering the New City growth agenda and realising the opportunities it provides to secure transformational change in Warrington. As presented, the PDO will do much to achieve the ambitions of New City. This is a bold plan which has recognised the need for significant growth in key areas of the Borough to deliver the infrastructure central to delivering New City.

8.2 Alongside this, these representations have highlighted a number of areas where the plan should be amended to address identified deficiencies, to ensure it represents the most sustainable approach to growing Warrington and fully addresses the spatial issues and challenges of the whole Borough. In light of this, Peel would encourage the Council to consider progressing the Local Plan on the following basis:

Housing need and requirement

8.3 Going beyond the housing requirement of 1,113 units per annum as an absolute minimum level of provision. An increase above the level of housing development proposed would be justified based on the exceptional growth opportunities presented by New City and to achieve a level of housing growth which is more commensurate with the transformational change sought through Warrington New City. A figure closer to 1,332 dwellings per annum as tested through the Sustainability Appraisal could be supported.

8.4 Even based on retaining the housing requirement at 1,113 dwellings per annum, there is a need to allocate land to deliver a minimum of 27,728 units, rather than the 24,220 figure proposed by the Council, including the release of Green Belt sites to accommodate 12,299 units, rather than 8,791 figure proposed by the Council. A proportionate increase in land requirements would arise from an increase to the numerical housing requirement as supported by Peel and outlined above,

Safeguarded land requirement

8.5 Increasing the allocation of safeguarded land for future housing development from 213.72 ha to 512 ha. This should be distributed across the Borough, rather than being concentrated in one location, to ensure a variety of non-Green Belt options for future allocation are provided and to avoid pre-determining the spatial distribution of future development which will be established through the next review of the Local Plan.

Strategic Objectives of the plan

8.6 To be extended to include a new Strategic Objective:

To ensure the future sustainability and viability of the outlying settlements of the Borough as attractive places to live and which meet the needs of their residents through the provision of a range of good quality housing and viable and sustainable service provision

Proposed site allocations

8.7 Peel has put forward a number of strategic residential growth opportunities as sustainable extensions to Outlying Settlements which can address the issues raised in these representations. These are:

- Land at Rushgreen Road, Lymm
- Land north east of Culcheth
- Land at Hollins Green
- Land at Lady Lane, Croft
- Land north west of Croft

8.8 These sites are shown on Figure 12.1 below.

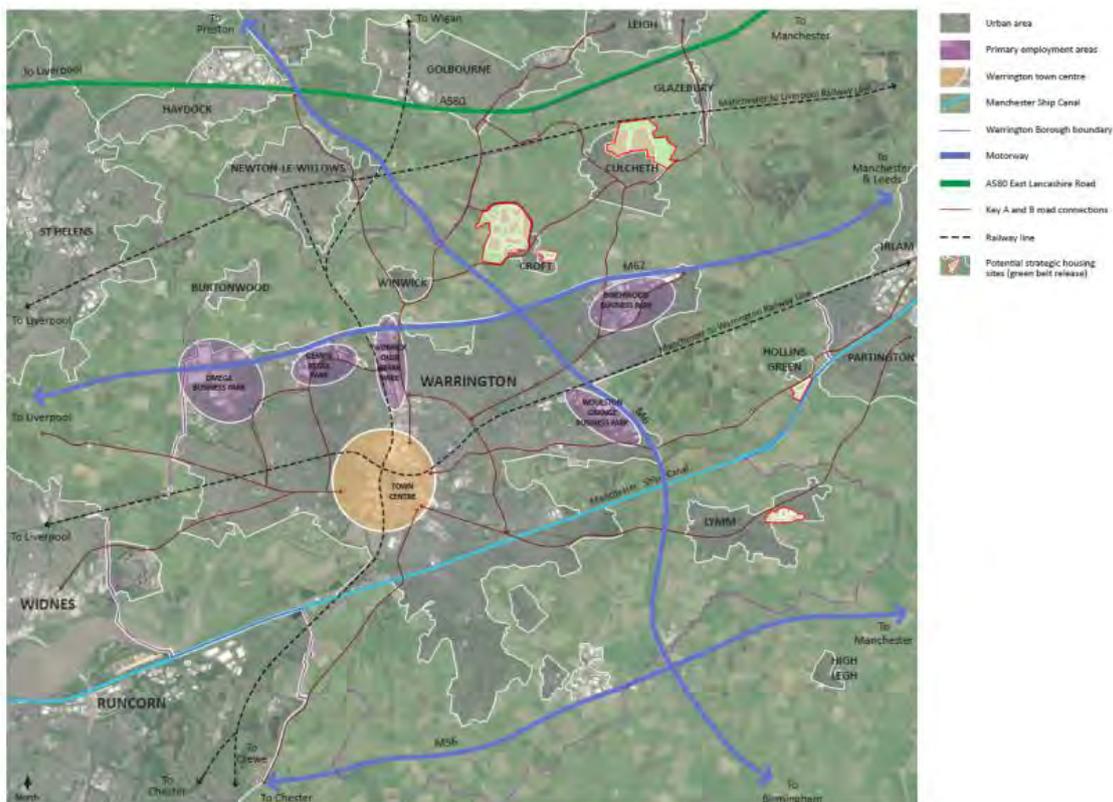


Figure 8.1: Outlying settlements – proposed sustainable extensions

8.9 Updated Development Prospectuses for each of these sites are provided as part of these representations. These demonstrate how these sites would be delivered over the Local Plan period to provide a range of high quality family and affordable housing within attractive settings with supporting infrastructure to serve the development and wider community. The supporting technical appendix to each Prospectus considers the site's constraints and opportunities and has informed the masterplanning process. These serve to ratify the proposals presented and confirm that the proposals do not give rise to any unacceptable impacts in respect of:

- Landscape;
- Highways and transport;
- Drainage and flood risk;
- Utilities;
- Ecology.

- 8.10 Appropriate mitigation measures in respect of the above areas are put forward where needed through a combination of proposals embedded into the scheme and and offsite solutions.
- 8.11 The collection of sites in the northern part of the Borough (land north of Culcheth, north west of Croft and Lady Lane, Croft) benefit from excellent accessibility to the strategic road network and key employment areas in the north of the Borough. They will particularly support the opportunity to achieve greater synergy between these key economic drivers and residential growth, reflecting the prevailing economic geography of the Borough. In doing so, they will support sustainable transport choices, reducing congestion on the existing road and reducing the need for investments in this infrastructure to deliver growth. This represents an important benefit of these locations over others in the Borough in the context of Strategic Objective W4 of the PDO.
- 8.12 These sites can also work together to secure the provision of new strategic infrastructure needed to both accommodate growth and address existing and pending capacity issues. This includes through providing land and funding for the provision of provision of a new secondary school may be as needed to serve the northern settlements of Warrington in view of existing capacity constraints affecting Culcheth High School, notwithstanding its expansion potential.
- 8.13 All of the sites respond to the identified need to secure additional residential growth within the Outlying Settlements to secure their long term sustainability as attractive and accessible places to live, supported by viable services as outlined in this representation .
- 8.14 Critically, these additional development proposals will secure much needed delivery of high quality family and affordable homes in the Outlying Settlements in manner which retain the plan's overwhelming focus on growth in Warrington . .
- 8.15 The allocation of these sites would secure the plan's sustainability and soundness, ensuring that it meets development needs and addresses spatial issues which go beyond New City. It will do so through the development of sustainably located sites which can be sensitively masterplanned to deliver high quality development and which present the opportunity to provide additional community infrastructure for the benefit of future residents and the existing communities of the Outlying Settlements. The overall benefits to the Outlying Settlements as sustainable places which meet the needs of their current and future residents will be significant.
- 8.16 Peel's proposals for each site is considered below.

Rushgreen, Lymm

- 8.17 The proposal will deliver a high quality residential development of approximately 500 houses, benefitting from good accessibility to the neighbourhood centre of Lymm and local bus services.
- 8.18 It provides the opportunity to deliver an extension to Outrington Community Primary School through utilising additional land within the proposed development area, securing an increase in local primary school capacity as needed to accommodate additional growth in Lymm beyond the incremental growth proposal presented in Spatial Option 2.
- 8.19 Arup, who prepared the Council's 2016 Green Belt Assessment have reappraised the site since the consultation on the Scope and Contents paper in 2016 and have modified their conclusion on its overall Green Belt contribution from 'moderate contribution' to 'weak contribution.' This supports Peel's previously evidenced position that the release of this site would not result in material harm to the Green Belt. The Bridgewater Canal forms an appropriate, defensible Green Belt boundary. The site could also be broken down into smaller phases if the overall areas was not supportable.

Land north of Culcheth

- 8.20 The proposed development at Culcheth will deliver between 600 and 900 houses on the northern edge of the settlement. It will deliver significant community benefits through the provision of a new Country Park serving the existing settlement, strengthening Culcheth's position as an attractive and popular residential location.
- 8.21 The development will be delivered through the release of an area of land which does not make a strategic contribution to the Green Belt in this location, with the Manchester-Liverpool railway line forming the northern boundary of site providing a long term defensible boundary to expanded urban area to safeguard against future Green Belt encroachment.
- 8.22 As set out in section 8, Peel disagrees with Arup's appraisal of this site and does not consider that sufficient regard has been had to the presence of the railway line to the north in forming a defensible boundary to the proposed Green Belt release. It remains Peel's view that the site forms part of a parcel which makes, at most, a moderate contribution to the Green Belt as explained and evidenced in its representations to the Scope and Contents document.
- 8.23 As noted above, Culcheth is located close to key employment areas in the north of the Borough, including Birchwood Park, as well as the strategic road network. Growth in Culcheth will promote sustainable transport choices and relieve congestion on existing roads. In the context of Spatial Option 3 being taken forward, Culcheth should be a strategic location for growth.
- 8.24 Lastly, development in Culcheth also has an important role to play in securing the future viability of the neighbourhood centre as an important asset for the town and its current and future residents. There are notable indicators that the neighbourhood centre is in decline, with the only two bank branches in Culcheth (Natwest and Barclays) having recently closed. Residential growth is critical in securing a viable and sustainable future for the Neighbourhood Centre. Further, and contrary to the Council's suggestion, an extension to Culcheth High School can be achieved in order to secure additional

capacity to meet future projected need and accommodate residential growth and would be acceptable in the context of its location part within the Outer Zone of a HSE Consultation area.

Land northwest of Croft

- 8.25 Croft is well positioned to support a sustainable new settlement for the north of Warrington. It is strategically located in relation to key employment areas and motorway links and in that regard will build on existing infrastructure assets, representing a sustainable approach to growth.
- 8.26 The site is also able to accommodate a range of new social and community infrastructure to support the new population and transform Croft into a sustainable settlement with its own services and public transport, able to support its existing residential population, into a sustainable, viable and more self-sufficient settlement where residents can meet their needs locally.
- 8.27 Moreover, the site has the opportunity to deliver the strategic level infrastructure needed to support the north of the Borough, including a new secondary school. The prevailing evidence presented through these representations has highlighted that irrespective of how much growth the outlying settlements accommodate, secondary school capacity is a pressing issue for the northern part of the Borough and one which the Council does not have a solution for at this time.
- 8.28 Restricting growth in the Outlying Settlements will not solve this issue, rather, and contrary to the Council's suggestions, supporting growth provides the opportunity to secure additional capacity. Should this not be possible through the expansion of Culcheth High School, which may only present a short term solution to a bigger issue in any case, the provision of a new school on land north west of Croft will secure the significant uplift in secondary school capacity which north Warrington needs, based both on demographic projections and to accommodate housing growth.

Land at Lady Lane, Croft

- 8.29 The proposed development at Lady Lane, Croft would deliver in the region of 200 family homes, representing a modest expansion of the existing settlement through 'infilling' an area of Green Belt land which bounds the settlement on two sides.
- 8.30 As noted above, Croft is well positioned to support a sustainable new settlement for the north of Warrington. It is strategically located in relation to key employment areas and motorway links and in that regard will build on existing infrastructure assets, representing a sustainable approach to growth.

Land at Hollins Green

- 8.31 The proposed development would represent an extension to Hollins Green delivering in the region of 300 family homes in an attractive landscape setting adjacent to the Manchester Ship Canal and on a key arterial route connecting Warrington with Salford and Manchester.
- 8.32 The development would be delivered utilising Green Belt land which the Council's consultants, Arup, have identified as now making a 'weak' contribution to the Green Belt following a redefinition of the area of land to be assessed.

9. Additional suggested sites

Statham Meadows

- 9.1 Section 4 of this report has set out a potential requirement to identify an additional source of employment land to meet local need. In order to meet this additional need, Peel has identified a site at Statham Meadows which would be suitable for employment use. This site was suggested for development through Peel's representations to the scope and contents consultation in December 2016 and a call for sites form was submitted. On further analysis of this site and the evidence base for the emerging Local Plan, Peel considers that this site may have alternative development potential.
- 9.2 This site extends to approximately 13 ha. It is located adjacent to Junction 21 of the M6 and has a frontage to the A57, which is a key route connecting Manchester and Warrington. This gives the site significant advantages in accommodating logistics or manufacturing uses and market demand would be high. Critically given the site's infrastructure connections, vehicles serving the site would utilise this strategic road network and would not need to use local or residential roads.
- 9.3 The site is capable of accommodating approximately 43,000 sq m of floor space, which would equate to two B2 / B8 units of approximately 200,000 sq ft each or four units of approximately 100,000 sq ft each. This would represent a small intrusion in to the Green Belt though the site is well contained by existing defensible features, including the River Mersey to the south and the A57 to the north ensuring the Green Belt in this area can endure over the long term.
- 9.4 This site also has the potential to be used for motorway services or roadside retail purposes, or part of a mix of uses alongside some employment development. The site's location on the M6 and A57 would lend itself to such uses, ensuring users of these busy stretches of strategic road have access to good quality welfare and break facilities as critical to the safe operation of the road network.

Transport appraisal

- 9.5 To support its proposals, Peel has commissioned an assessment of the road network and junctions to understand whether these can accommodate the proposed development. This is considered in the Technical Note provided at Appendix 4.
- 9.6 As noted above, the site is located immediately to the south of M6 Junction 21 (M6MJ21). The junction is formed by 'dumb-bell' roundabouts located to the east and west of the mainline of M6 motorway. Both roundabouts connect with A57 Manchester Road with a two-lane dual carriageway connecting the two. Access to the site will be taken direct off the eastern roundabout.
- 9.7 The traffic movements at the roundabout have been derived from link based traffic counts with a 'Furness' procedure then used to estimate turning movements at both junctions. The eastern roundabout currently carries c2750 – 3050 vehicles in the peak hours with the western roundabout carrying higher flows of c4700 – 4850 vehicles in the peak hours.

- 9.8 The existing capacity of M6 J21 has been assessed and this shows that both roundabouts currently operate within capacity. All the predicted queues at the junction are modest but the arms of the junction with the highest queues are : Western roundabout, the M6 northbound off-slip and eastbound A57 in the morning peak and Woolston Grange Avenue in the evening peak; Eastern roundabout, the eastbound Manchester Road in the PM peak.
- 9.9 The traffic flows generated by potential development options have been derived using industry standard methods. For B2/B8 uses, the levels of trip generations will depend upon the split of B2 and B8 uses and the type of operation, but a typical B2/B8 employment use on the site would generate c300 vehicle movements in each peak hour. An alternative 'roadside services' use (convenience retail, hot food sales, pub/restaurant, hotel and petrol filling station) would generate similar levels of traffic, c 300 – 350 vehicle movements in each peak hour. Many of the traffic movements associated with the latter will already be on the road network and there will be linked trips between the various uses on the site (e.g. one vehicular trip made to both the PFS and convenience retail).
- 9.10 The traffic flows generated by the potential uses have been distributed and assigned to the surrounding road network. At the eastern (site access) roundabout, the total traffic flows generated by B2/B8 employment uses and roadside services are similar and represent C10% of existing traffic flows. At the western roundabout, the B2/8 uses represent C5% of existing flows compared to C3% for roadside services.
- 9.11 Access to the site will be taken from an improved entry to the eastern roundabout with consequential amendments to the westbound A57 approach. Footway connections will also be provided. At the appropriate time the access proposals will be subject to road safety audit but it is considered that safe and satisfactory access can be provided to the site.
- 9.12 The impacts of the traffic flows generated by employment and roadside services uses has been assessed at the two roundabouts at M6J21. Whilst both options increase queue lengths, it is concluded that the residual traffic impacts of the proposals are not severe.
- 9.13 Traffic is also distributed in various directions from the junction and is therefore spread around the surrounding highway network. The impacts of this can be assessed in full as the proposals are progressed but given the scale of total traffic generations and that the flows are spread across several roads, then off-site traffic impacts, away from M6J21, will not be severe.
- 9.14 In terms of sustainability, footways will be provided from the site to connect with existing facilities. The strategic cycle route 2 (Woolston to town centre) runs from Manchester Road west of M6J21 to the town centre via lightly trafficked streets and cycle paths. Bus route 100 runs along the site frontage, providing an hourly frequency service to Warrington Interchange, Hollins Green, Cadishead, Irlam, the Trafford Centre, Eccles, Salford and Manchester. The 3/3E bus route runs from Woolston Grange Avenue to Warrington Interchange with bus stops c 500m from the site on Manchester Road. It provides a 30 minute frequency daytime service (20 minutes weekday peak hours) with hourly evening services. The site is therefore accessible by sustainable travel modes.

- 9.15 Overall, it is therefore concluded in highways and transport terms, that the site can be accessed satisfactorily and safely, residual traffic impacts will not be severe and the site will be sustainable and accessible

Glazebrook Lane

- 9.16 As part of submission to the call for sites exercise in December 2016, Peel suggested a site at Glazebrook Lane for residential development. This site is located in the Green Belt on the eastern edge of the Borough adjacent to its boundary with Salford. The site is bounded by a watercourse to the east and has a limited frontage to the B5212, though is largely situated to the rear of existing residential properties.
- 9.17 The site adjoins the proposed 'Western Cadishead and Irlam' (Policy reference WG2) residential allocation as identified in the draft Greater Manchester Spatial Framework (GMSF October 2016). The western edge of this allocation terminates at Salford's boundary with Warrington. The proposed allocation at Glazebrook Lane would represent a natural and logical extension of this allocation.
- 9.18 Peel considers the site to be suitable for residential use and allocation through the Warrington Local Plan. In the event that the GMSF allocation WG2 progresses, the allocation of the Glazebrook Lane site should be considered favourable by Warrington Council in the context of the delivery of the WG2 allocation.

Appendix 1: Recognising local settlement needs

Appendix 1: Recognising Local Settlement Needs

Introduction

The National Planning Policy Framework (NPPF) makes clear that the planning system should contribute towards delivering development which is economically, socially and environmentally sustainable. Providing a supply of housing which is sufficient to meet present and future needs is integral to the social dimension of sustainable development, which seeks to support strong, vibrant and healthy communities¹.

The Government has signalled its intention to update the NPPF to address the ‘*need to build many more houses, of the type people want to live in, in the places they want to live*’². The Housing White Paper notes that:

*“There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people”*³

Changes to the NPPF are also expected to require local authorities to identify ‘*opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up*’⁴. Views were sought by Government on whether a standard methodology for assessing housing needs at neighbourhood level could be developed, with a view to ensuring that Local Plans and Neighbourhood Plans address their local need for housing⁵. This evidently continues to recognise the importance of understanding local housing needs, and indeed the High Court has expressly distinguished between the local needs of villages and their environs and the wider needs of a local authority⁶.

The Government’s current consultation ‘*Planning for the right homes in the right places*’ presents proposals to amend national policy so that local planning authorities are expected to provide neighbourhood planning groups with a housing need figure. The consultation document states:

*“We propose to make clear in planning guidance that authorities may do this by making a reasoned judgement based on the settlement strategy and housing allocations in their plan, so long as the local plan provides a sufficiently up-to-date basis to do so (including situations where an emerging local plan is close to adoption).”*⁷

¹ DCLG (2012) National Planning Policy Framework, para 7

² DCLG (2017) Fixing our Broken Housing Market – the housing white paper, foreword from the Prime Minister

³ Ibid, para A.54

⁴ Ibid, para 1.33

⁵ Ibid, para A.65

⁶ East Bergholt Parish Council v Babergh District Council [2016] EWHC 3400 (Admin)

⁷ DCLG (2017) Planning for the right homes in the right places: consultation proposals, Paragraph 96

Ensuring that the local need for housing is fully considered and met through a 'settlement strategy' is therefore a factor which should strongly feature in establishing an appropriate spatial distribution of development through the preparation of a Local Plan.

Peel has previously submitted representations to Warrington Borough Council ('the Council') which acknowledged the appropriateness of focusing growth in the main urban area of Warrington but highlighted the lasting adverse consequences of an approach which has in recent years failed to adequately provide for needs of the other outlying settlements, an approach which risks being continued under the proposed approach through the Local Plan Preferred Development Option.

The selection of its preferred spatial option⁸ – which caps the growth of the 'outlying settlements' to an arbitrary 10% increase – shows that the Council has not recognised and addressed the needs of individual settlements in reviewing its Local Plan. The consequences of such an approach are considered within this appendix.

The Preferred Development Option Approach

The Council's preference for Option 2 focuses Green Belt release adjacent to the main urban area of Warrington and allows for 'incremental' growth to accommodate at least 1,000 additional dwellings in outlying settlements. The development trajectory (Table 11) demonstrates that outlying settlements will collectively accommodate 1,429 additional homes over the plan period, when taking account of proposed Green Belt release and existing sites identified within the Strategic Housing Land Availability Assessment⁹ (SHLAA). This represents circa 6% of the total level of housing development proposed in Warrington.

Table 1.1 Development Trajectory in Outlying Settlements

	Dwellings on Green Belt sites	Dwellings on SHLAA sites	Total dwellings	%
Burtonwood	150	21	171	0.7%
Croft	60	1	61	0.2%
Culcheth	300	70	370	1.5%
Glazebury	50	17	67	0.3%
Hollins Green	40	1	41	0.2%
Lymm	500	101	601	2.4%
Winwick	90	21	111	0.4%
Outlying settlements	1,190	232	1,422	5.7%
Warrington borough			24,774	100.0%

Source: Warrington Borough Council, 2017

⁸ Warrington Borough Council (July 2017) Preferred Development Option Regulation 18 Consultation

⁹ Settlement profiles do not confirm location of residual 7 units expected to be delivered in outlying settlements, based on the development trajectory. These units are therefore omitted from this analysis

This proposed spatial distribution resulted from the assessment of growth scenarios against strategic objectives defined in the emerging Local Plan. This consistently discounted higher growth options for outlying settlements on the basis that such an approach:

- Does not perform well against the objectives of the Local Plan;
- Would not positively contribute towards the Council's New City concept;
- Could impact on the objectives of the Green Belt; and
- Could impact on the character of each settlement.

The local need for, and benefits of, housing in the outlying settlements does not feature within the criteria used to evaluate the growth scenarios, which primarily test alignment with the Council's New City concept, the availability of social infrastructure, delivery issues, environmental considerations and the impact on the transport network. Indeed it is evident that the criteria are themselves not objective or balanced in this regard, as they are inherently weighted towards directing growth towards the Warrington urban area - rather than also considering the potential role that other parts of the borough can play in supporting the New City concept. This point is explored in more detail within the main representation response.

On this basis, from the Council's approach and published evidence, there is no indication that the development needs of the borough's outlying settlements have been taken into account in arriving at a preferred spatial option, instead arbitrarily capping growth to 10% of each settlement's size.

The interim Sustainability Appraisal¹⁰ (SA) commissioned by the Council includes some appreciation of the benefits associated with a more distributed development pattern, albeit these do not feature elsewhere in the evidence base or indeed in the PDO consultation document. The technical basis for this assessment is also unclear, with the SA outlining an intention to assess the '*extent to which...development will help to meet housing needs*' but consistently indicating that '*due to incomplete data, sites have not been assessed against this criterion*'¹¹.

The SA does acknowledge that a focus only on the urban area of Warrington '*would not help to maintain the vitality and viability of services, facilities and businesses in the outer settlements, which could have negative implications for these areas*' in relation to local spending and demand for public transport¹². It is noted that providing new market and affordable homes in settlements would benefit '*people that wish to stay in the settlement but are struggling to afford a home there*'¹³, and restricting delivery of housing in outlying settlements could indeed '*affect affordability and choice*' in these areas¹⁴.

The SA suggests that incremental growth in settlements '*ought to help deliver local housing needs in a number of settlements across the borough*', which '*should help to ensure that there is a greater choice of housing overall and that affordability issues are potentially tackled where*

¹⁰ AECOM (July 2017) Warrington Local Plan Review Sustainability Appraisal: Interim SA Report

¹¹ AECOM (July 2017) Warrington Local Plan Review Sustainability Appraisal (Interim Report) – Technical Appendix A: Site Proformas

¹² AECOM (July 2017) Warrington Local Plan Review Sustainability Appraisal: Interim SA Report, page 48

¹³ Ibid, page 49

¹⁴ Ibid, page 55

needed¹⁵. Nevertheless, it is acknowledged by the Council that an increased dispersal of growth – beyond the incremental growth option preferred– could have further positive effects by helping to improve affordability¹⁶.

A Proportionate Spatial Distribution of Needs

National policy and guidance highlights the importance of understanding the spatial distribution of housing needs as part of the plan-making process. The DCLG’s current consultation, as referenced at the start of this appendix, highlights the role that the Local Plan will be expected to play in determining a spatial distribution of housing provision.

The consultation document recognises that in many instances in advance of a Plan being submitted and adopted there will be a need to ensure that neighbourhood plans are provided with an ‘allocated’ housing figure. The Government has proposed, in such an instance, the introduction of such a ‘*formula-based approach*’ to provide communities with a ‘*starting point*’ on the scale of housing need which locally exists in settlements¹⁷. This proposed formula takes the population of an area and calculates this as a percentage of an authority’s total population, before applying this percentage to the level of housing need calculated for local authorities.

As highlighted above, the development trajectory proposed by the Council would direct circa 6% of planned housing provision towards outlying settlements. The extent to which this is sufficient to meet these settlements’ needs can, on this basis, be initially considered through comparison with the size of their existing populations.

Our representations have previously presented analysis of population on the basis of built up areas (BUAs) defined for the 2011 Census by the Office for National Statistics (ONS), which largely correlate with the boundaries of outlying settlements since defined by the Council. This is represented in the following table, highlighting settlements’ population as a proportion of the total population for Warrington in 2011. This is applied to the preferred development option (1,113dpa) and higher growth scenario (1,332dpa) presented for the borough, and compared with the distribution proposed by the Council.

Table 1.1 Distribution of Population, Housing Need and Proposed Development in Outlying Settlements

	Population	%	Total need implied by		Proposed distribution
			1,113dpa PDO	1,332dpa Higher Growth	
Burtonwood	3,361	1.7%	370	443	171
Croft	1,492	0.7%	164	197	61
Culcheth	6,708	3.3%	738	884	370
Glazebury	1,068	0.5%	118	141	67

¹⁵ Ibid, page 55

¹⁶ Ibid, page 55

¹⁷ DCLG (September 2017) Planning for the right homes in the right places: consultation proposals

Hollins Green	913	0.5%	100	120	41
Lymm	11,608	5.7%	1,278	1,529	601
Winwick	2,435	1.2%	268	321	111
Outlying settlements	27,585	13.6%	3,036	3,634	1,422
Warrington borough	202,228	100.0%	22,260	26,640	24,774
% in outlying settlements	13.6%	–	13.6%	13.6%	5.7%

Source: Census 2011; Warrington Borough Council; Turley

Distributing circa 6% of housing development towards outlying settlements is evidently not proportionate to the spatial distribution of the population, given that the outlying settlements collectively accommodated almost 14% of the borough's population at the latest Census. This is evidently a consequence of the arbitrary cap which has been applied by the Council to the growth of outlying settlements through the preferred spatial option.

Considering the spatial distribution of need based on the Government's proposed approach implies a need for at least 3,000 dwellings in the outlying settlements over the plan period based on the provision of 1,113 homes per annum across the borough. Under the high-growth scenario this translates into a need for in excess of 3,600 homes.

Even at the lower end of this range the implied provision of housing within the outlying settlements is more than double the level of provision proposed in these settlements. This is mirrored at individual settlement level, with the proposed level of provision almost uniformly less than half that which would be required based on a proportionate population-based distribution. This indicates that the level of development allocated to these settlements based on this comparatively simplistic approach would fall short of enabling settlements to grow in 'baseline' terms.

This is considered an important illustration of a baseline or 'starting point' for considering the potential distribution of needs in Warrington's outlying settlements, and should be favoured in informing a policy-based approach to distribute provision over an arbitrary cap on settlements' future growth.

Whilst this provides an important starting point it is considered that such a formula-based approach does, however, not take sufficient account of the specific needs of individual settlements, which should also be taken into account in devising a sustainable development strategy. This is explored further within the remainder of this appendix through a consideration of the factors which should be taken into account in order to ensure that the individual needs of settlements are recognised and accommodated.

Understanding Settlements' Development Needs

As highlighted above, the Council's proposed approach towards spatial distribution does not adequately consider the development needs of outlying settlements. Evidence submitted by Peel in support of earlier representations in December 2016 sought to assist the Council in considering this issue, identifying the issues and matters which should be taken into account in developing a sustainable spatial approach.

This section draws together and where relevant updates this analysis to highlight the individual characteristics of outlying settlements, and consider the level of development needed to respond to future challenges respectively faced. It should be noted that where data is sufficiently granular, an updated position is presented herein to reflect the Council's confirmed settlement boundaries¹⁸. Given that these boundaries have not been designed to reflect the statistical geographies which form the basis for Census data, however, built-up areas (BUAs) defined by the Office for National Statistics (ONS) have also been retained from the earlier analysis where appropriate¹⁹.

Historic Development

The Council does not monitor the historic completion of homes at settlement level. However, the distribution of new build housing sales can be established, based on price paid data held by the Land Registry. This updates similar analysis previously submitted to reflect the Council's defined settlement boundaries and take account of sales recorded in the calendar year of 2016. The following table summarises the number of new build sales recorded in each of the outlying settlements over the past decade (2007 – 2016). This shows that outlying settlements have accommodated only 5% of new build sales in Warrington over the past decade, and further interrogation of the data highlights a declining contribution over this period. In 2007, outlying settlements accommodated around one in ten (11%) new build sales, falling to only 2% in 2016. This suggests an increasingly imbalanced development profile in the borough.

Table 1.1 Distribution of New Build Sales 2007 – 2016

	New build sales 2007 – 2016	Proportion of all new build sales 2007 – 2016
Burtonwood	0	0%
Croft	0	0%
Culcheth	21	1%
Glazebury	10	0%
Hollins Green	4	0%
Lymm	144	4%
Winwick	1	0%
Total	180	5%
UA total	3,745	100%

Source: Land Registry

Furthermore, while this serves to illustrate the limited overall contribution of these settlements in accommodating new development, it equally highlights a contrasting picture in the level of development historically seen in each settlement. The 144 new build sales recorded in Lymm

¹⁸ Warrington Borough Council (July 2017) Settlement Profiles – Outlying Settlements

¹⁹ The extent of defined built-up areas align relatively closely with the Council's defined settlement boundaries, a bit the former includes a larger area within the settlement of Winwick to capture residential development to the south-west of the village

during this period evidently exceeds the zero sales recorded in Burtonwood and Croft by some distance.

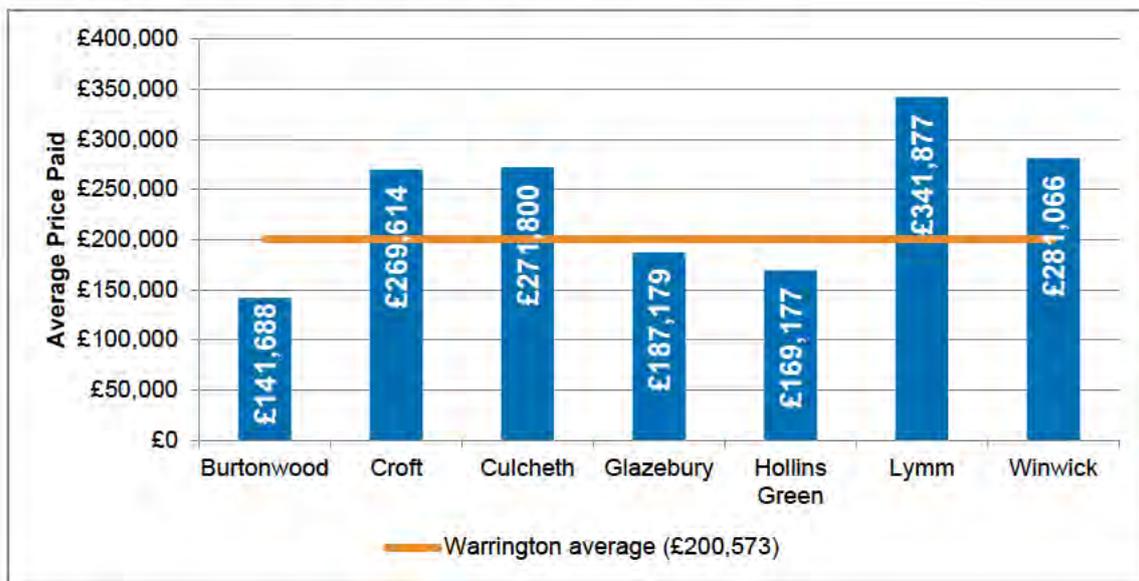
House Prices and Affordability

Planning Practice Guidance (PPG) recognises that local imbalances between housing supply and demand can manifest in worsening market signals, such as increasing house prices or deterioration in the relationship between earnings and housing costs²⁰.

An average of £290,016 was paid for housing in the outlying settlements in the calendar year of 2016, which is some 55% higher than the average price paid elsewhere in the borough (£187,328) – primarily consisting of the Warrington urban area.

However, it is important to recognise that the price paid for housing in each of the outlying settlements varies, reflecting a range of local factors including but not limited to the availability of housing. In 2016, significantly higher than the borough wide average values of transactions were recorded by the Land Registry in Lymm, Winwick, Culceth and Croft, with lower value sales in Burtonwood, Hollins Green and Glazebury.

Figure 1.1 Average Price Paid in Outlying Settlements 2016



Source: Land Registry

The average price paid in Burtonwood has, however, increased over recent years, with average sales values in 2016 some 27% higher than five years previously (2012). This was more than double the 13% growth recorded across Warrington over the same period, and indeed the average price paid in all but two of the outlying settlements (Glazebury and Hollins Green) grew at a rate which exceeded the wider borough average. This is illustrated in the table below.

Strongest growth in house prices over this most recent period have been recorded in the outlying settlements in close proximity to the northern part of the urban area and Lymm.

²⁰ PPG Reference ID 2a-019-20140306

In the context of appraising the relationship between supply and demand it is also observed that the greatest proportionate growth in house prices was seen in settlements which have recorded no new build sales over the past decade.

Table 1.2 Change in Average Price Paid in Warrington and Outlying Settlements 2012 – 2016

	2012	2016	% change
Burtonwood	£111,242	£141,688	27%
Croft	£214,016	£269,614	26%
Culcheth	£225,003	£271,800	21%
Lymm	£286,843	£341,877	19%
Winwick	£239,014	£281,066	18%
Warrington UA	£177,837	£200,573	13%
Hollins Green	£151,564	£169,177	12%
Glazebury	£171,594	£187,179	9%

Source: Land Registry

High house prices can inhibit the formation of new households, force local residents to move elsewhere or generate an additional need for affordable housing, where households are unable to access market housing.

As highlighted earlier in this section, the Council's evidence base omits consideration of the local need for housing in the outlying settlements, and does not present evidence on the number of households locally registered on the waiting list. The absence of this important indicator of current affordable housing need should be resolved to inform an appropriate spatial development strategy which provides clear evidence that it is cognisant of and seeks to meet at a local level those with the most acute housing needs.

Socio-Economic Profile

The Council's published Settlement Profiles include a high level appreciation of the overall size of the population, albeit this is directly derived from the number of residential addresses in each settlement by consistently applying an assumption on average household size. A position on age profile in each settlement is estimated based on ward level findings from the Census, masking variance between three of the outlying settlements (Croft, Culcheth and Glazebury) due to the extent of the ward geography. The approach taken in determining the socio-economic characteristics of each settlement therefore appears comparatively crude.

As highlighted earlier in this appendix, our representations have previously presented analysis on the basis of built up areas (BUAs) defined by the ONS, which largely correlate with the settlement boundaries since defined by the Council. This is represented below for outlying settlements, with the Council's estimated population in 2017 also included for context. Comparison with the Census findings for the borough as a whole is also made.

Table 1.1 Population and Age Profile of Outlying Settlements 2011/2017

	2011 Census				2017*
	Total	15 and under	16 – 64	65 and over	Total ²¹
Burtonwood	3,361	16%	60%	24%	3,219
Croft	1,492	19%	59%	22%	1,367
Culcheth	6,708	19%	58%	23%	6,664
Glazebury	1,068	16%	64%	20%	1,123
Hollins Green	913	15%	64%	21%	837
Lymm	11,608	21%	61%	18%	11,192
Winwick	2,435	21%	63%	16%	1,954
Warrington borough	202,228	19%	65%	16%	–

Source: Census 2011; Warrington Borough Council

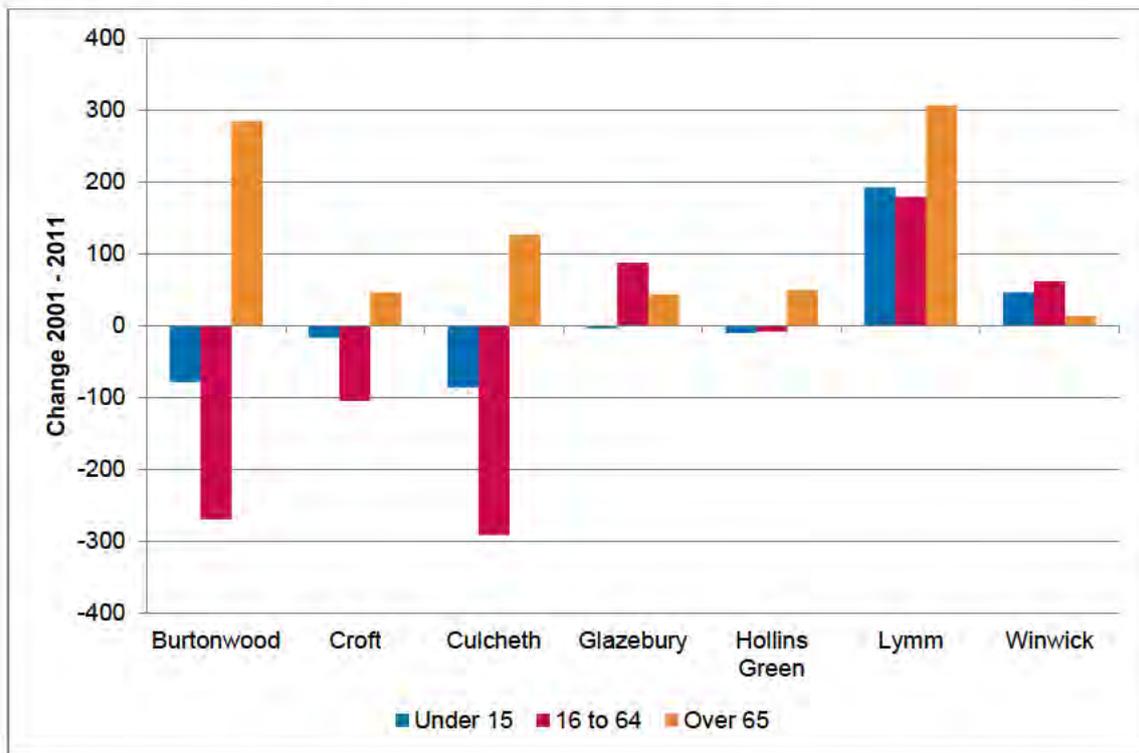
* estimated by the Council

As previously highlighted, the Census recorded variance in the age profile of settlements, and indeed considerable variance in the overall size of each settlement with Lymm, for example, over twelve times larger than Hollins Green – the smallest of the outlying settlements. Glazebury and Hollins Green also contained a relatively large representation of working age (16 – 64) residents, contrasting with Culcheth and Croft where older residents – and indeed younger children – were more prevalent. Over one in five (21%) residents of Lymm and Winwick were aged 15 or under. Relative to the borough average, each of the outlying settlements contained a smaller working age population at the Census, with a larger proportion of older residents.

The age profile of outlying settlements has also changed over recent years. Although change within BUA geographies cannot be established – owing to the absence of identical geographies at the 2001 Census – a best fit exercise can identify the smallest statistical output area geographies for which data was consistently collected in 2011 and 2001. As illustrated in the following chart, this suggests that the majority of outlying settlements have seen a reduction in the size of their working age population, with growth in older residents also a defining feature.

²¹ Estimated by the Council by applying average household size assumption to residential addresses in January 2017

Figure 1.2 Change in Population by Age Group 2001 – 2011



The settlements of Culcheth, Croft and Burtonwood in particular have seen a significant fall in the core 'working age' (16 – 64) population over this period, with Hollins Green also seeing a more marginal reduction. This is contrasted with significant growth recorded in the older age groups. The limited increase in new housing, as shown in Table 1.2, will have been an important factor in this trend with new younger households not able to find housing as readily. This is notable in the case of Lymm with this showing the strongest growth in this age cohort whilst this being the only settlement which has seen any notable level of new-build housing.

A failure to provide new housing will, recognising a wider trend of ageing populations, only exacerbate the skewing of the age profile going forward.

The changing age profile will have implications for the vibrancy of individual settlements and the vitality of social infrastructure. The separate critique of the education evidence submitted as part of these representations (Appendix 2), for example, highlighted that the number of children at primary schools in Culcheth and Croft are forecast to decrease by 13% in only 5 years (2021/22). By way of contrast the more positive age profile in Lymm, noting a potential relationship with the comparatively high numbers of new homes delivered (Table 1.2), indicates that pupils at primary school in Lymm are forecast to increase by 5%.

The changing age profile has also had implications for the size of the labour force in each of the outlying settlements, which has changed over recent years. The following table shows the change in the economically active population in each settlement in absolute and proportionate terms between the two Census years.

Table 1.2 Change in Economically Active Population 2001 – 2011

	2001	2011	Change	%
Burtonwood	1,702	1,697	-5	0%
Croft	595	576	-19	-3%
Culcheth	2,328	2,257	-71	-3%
Glazebury	490	576	86	18%
Hollins Green	645	692	47	7%
Lymm	3,135	3,510	375	12%
Winwick	439	540	101	23%

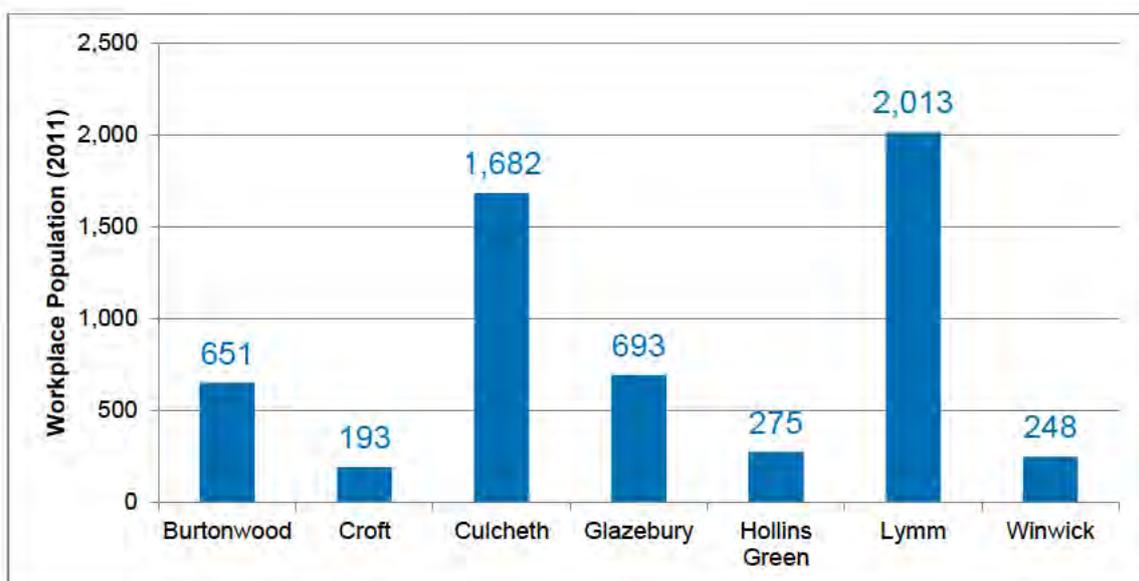
Source: Census 2001; Census 2011

Lymm shows the highest absolute level of increase in its economically active population, followed by Winwick and Glazebury. In the case of Lymm again this is likely to reflect the provision of new homes, which as identified earlier contrasts with the other settlements.

Discounting Lymm, this analysis suggests that the other outlying settlements have accommodated only 139 additional economically active residents over the decade to 2011. Northern settlements in particular have largely remained static in this regard, with the settlements of Croft, Culcheth and Burtonwood all showing a decline in the size of their economically active population.

This has implications for settlements' capacity to accommodate employment. The 2011 Census recorded people working in each of the outlying settlements²², ranging from other 2,000 workers in Lymm to circa 200 people working in Croft. This is summarised in the following chart.

Figure 1.3 Workplace Population of Outlying Settlements 2011



²² Workplace population is not produced for built up areas, and data is therefore collated for best fit output areas

Source: Census 2011

Outside of the employment offer within each of the individual settlements it is important to also set this in the context of a wider spatial appreciation of key employment generators across the authority.

The main generators of employment in Warrington include:

- **Warrington Town Centre and Warrington Waters** – the town centre represents a significant concentration of a range of jobs, which it is anticipated will continue to grow as the borough's population grows and new businesses choose to locate in the town. Continued potential for job generation is reflected in the ten development sites identified;
- **Omega and Lingley Mere** – the strategic site will continue to represent the borough's main employment site, with its continued development anticipated to continue to generate significant new employment opportunities;
- **North of the Warrington Urban Area** – a cluster of strategic employment areas and sites are located in this part of the borough, outside of Omega and Lingley Mere, including Gemini, Birchwood Park, Woolston Grange and the Winwick Road Corridor; and
- **Port Warrington** – the Port forms an important part of the Atlantic Gateway and supports the economic potential of the Manchester Ship Canal, with continued expansion providing the opportunity for further employment growth.

It is evident from the list of key drivers that there are a concentration of employment generators within and surrounding the urban area of the town of Warrington – particularly to the north.

It is important that consideration is given to the infrastructure links – existing, planned and proposed – from not only the town of Warrington but also the other settlements across the borough, which could in physical terms represent equal or more sustainable locations for labour to be located. This recognises the borough's favourable geographic location surrounded by significant economic drivers and areas of strong growth in high value employment.

In this regard, there are benefits to ensuring that a labour force can be accommodated in nearby settlements to minimise unsustainable commuting patterns. This is explored further within the main representations.

The overall level of employment respectively supported in each of the outlying settlements reflects their economic roles, but is an important factor shaping their vitality, vibrancy and sustainability. Sustaining employment in the outlying settlements requires a local labour force, and the resilience of local businesses could indeed be threatened in those areas where local demographics have reduced or will reduce the economically active population over the plan period. This can also have implications for the level of retail and community infrastructure provision that can be supported within settlements, impacting upon their sustainability (a point which is considered further below in the context of the current profile of community infrastructure).

Community Facilities

The Council's published Settlement Profiles appraise the availability of community infrastructure, including GP practices, dentists, libraries and community centres²³. Provision is summarised in the following table.

Table 1.1 Availability of Community Facilities in Outlying Settlements

	GP surgery	Pharmacy	Dentist	Library	Centre
Lymm	Y	Y	Y	Y	Y
Culcheth	Y	Y	Y	Y	Y
Burtonwood	Y	Y	N	Y	Y
Croft	N	N	N	N	Y
Hollins Green	N	N	N	N	Y
Winwick	N	N	N	N	Y
Glazebury	N	N	N	N	N

Source: Warrington Borough Council, 2017

While the Council acknowledges that additional demand for infrastructure would be generated through the growth of these settlements, options to accommodate this demand through new provision of specific types of infrastructure including, for example, new GP surgeries are indicatively presented. Outside of education infrastructure the need to provide new community infrastructure to accommodate growth is not cited as a reason to discount higher levels of development, which is considered the correct approach given that provision for such facilities can be made within development of any scale to locally accommodate demand.

More limited provision exists in smaller settlements, particularly Hollins Green, Winwick and Glazebury. The availability of facilities in proximate settlements is largely viewed as sufficient to absorb existing and potential future demand generated by residents, albeit there may be a need for some expansion of existing facilities depending upon the scale of future growth.

The Development Needs of the Outlying Settlements

The Council's preferred development option applies an arbitrary cap which constrains the growth of outlying settlements to 10% of their existing size. This is underpinned by a development trajectory and spatial strategy which directs only circa 5% of housing development towards outlying settlements over the plan period.

This contrasts notably with the spatial distribution of the population in Warrington, with the 2011 Census finding that almost 14% of the borough's residents live in outlying settlements.

The Government has re-affirmed the importance of Local Plans providing a clear steer as to the spatial distribution of housing needs. Where a strategy is not set out in a Local Plan the Government has proposed a formula-based approach towards disaggregating authorities' housing needs based on the proportionate distribution of the existing population. While this

²³ Education provision is considered separately within these representations

remains only an illustrate 'starting point', in the case of Warrington such an approach implies a need for at least 3,000 dwellings in the outlying settlements over the plan period based on the provision of 1,113 homes per annum across the borough. Under the high-growth scenario this translates into a need for in excess of 3,600 homes.

Even at the lower end of this range the implied provision of housing within the outlying settlements is more than double the level of provision proposed in these settlements. This is mirrored at individual settlement level, with the proposed level of provision almost uniformly less than half that which would be required based on a proportionate population-based distribution. This indicates that the level of development allocated to these settlements based on this comparatively simplistic approach would fall short of enabling settlements to grow in 'baseline' terms.

This is considered an important illustration of a baseline or 'starting point' for considering the potential distribution of needs in Warrington's outlying settlements, and should be favoured in informing a policy-based approach to distribute provision over an arbitrary cap on settlements' future growth.

Whilst this provides an important starting point it is considered that such a formula-based approach does, however, not take sufficient account of the specific needs of individual settlements, which should also be taken into account in devising a sustainable development strategy. This is explored further within the remainder of this appendix through a consideration of the factors which should be taken into account in order to ensure that the individual needs of settlements are recognised and accommodated.

The Council has not produced a comprehensive assessment of the characteristics of the individual outlying settlements, and has not assessed the development needs of each settlement. Its preferred spatial option therefore does not cater for the outlying settlements, and is subsequently unlikely to address respective challenges influencing their future over the plan period and beyond. Such an approach can have lasting adverse impacts, as previously highlighted.

The analysis in this appendix has identified the distinct characteristics of the borough's outlying settlements, in terms of their size, socio-economic profile, historic development and respective role in providing community infrastructure. The distinctive nature of each settlement is highlighted within the following summary table, which draws together much of the analysis presented in this appendix.

Table 1.1 Settlement Distinctions – Key Indicators

	New build sales 2007 – 2016	Average price paid 2016	Residents aged 16 to 64 2011	Workplace population 2011	Provision of community facilities
Burtonwood	0	£141,688	60%	651	Moderate
Croft	0	£269,614	59%	193	Limited
Culcheth	21	£271,800	58%	1,682	High
Glazebury	10	£187,179	64%	693	Limited

Hollins Green	4	£169,177	64%	275	Limited
Lymm	144	£341,877	61%	2,013	High
Winwick	1	£281,066	63%	248	Limited

Source: Turley analysis

It is evident that historically there has been a very limited level of new housing provided in the outlying settlements, with Lymm the only settlement where there has been any notable level of new housing provided in recent years. The outlying settlements generally demonstrate a population profile which is more skewed towards older age groups. The low levels of development have served to exacerbate this issue with this particularly evident in Culcheth, Croft and Burtonwood which have all seen their core working-age groups (16 – 64) fall notably over recent years.

A failure to positively address this issue in these settlements will only serve to reinforce this demographic structure over the Plan period. This will have local implications for the vitality and vibrancy of settlements as well as their local business base and economy.

The comparative shortage of new housing provision has compounded the high market demand of these settlements which has manifested itself in comparatively high house prices across many of the settlements, particularly in Lymm, Culcheth, Croft and Winwick. This will continue to have adverse implications for younger households in particular looking to remain within these settlements therefore in a number of cases further compounding the changing demographic profile.

Taking a more strategic perspective it is apparent that there are significant concentrations of existing and planned generators of employment across the north of the borough, proximate to many of the outlying settlements. Whilst this acts as a driver of demand there is no evidence that this has been taken into consideration in the development of the proposed distribution of development.

Taking the above into consideration it is considered that the Council should fundamentally revisit its approach to allocating housing provision to the outlying settlements. This should adopt a starting point, in accordance with emerging DCLG guidance, which recognises the current spatial distribution of communities across the authority. This would imply the need to plan for a minimum level of need in the region of 3,000 dwellings.

This level of need, however, fails to fully account for the more locally specific drivers of need and the scale of growth required to address the implications of historic under-provision and future drivers of demand. In particular it is apparent that the northern outlying settlements, such as Culcheth and Croft, demonstrate the consequences of supply failing to keep pace with demand in terms of both an unsustainable emerging demographic profile and worsening market signals. Equally taking a more strategic view these settlements lie in close proximity to key areas of current and future employment growth in the authority. A more sustainable settlement distribution of growth should take full account as to their potential to support the economic aspirations of Warrington. This would strongly indicate planning above a baseline minimum level of need in these settlements.

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Appendix 2: Primary and secondary education assessment

Comments on primary and secondary education capacity

Warrington Local Plan Representations

September 2017

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Executive Summary

This report has been commissioned by Peel Holdings (Management) Ltd (“Peel”) to inform its consultation response on the Preferred Development Option (PDO) of Warrington Borough Council’s emerging Local Plan. The analysis specifically considers the methods and conclusions relating to school capacity in the defined Outlying Settlements of the Borough. The purpose of the report is to assess the evidence which underpins the selection of the PDO. It forms part of a suite of technical documents which are appended to Peel’s representations to the consultation.

The Council has identified its PDO as the ‘incremental growth’ scenario which allocates the majority of growth to urban Warrington and the remainder to outlying settlements. This represents 10% growth across each of these outlying settlements.

A key factor in identifying ‘incremental growth’ as the PDO was the inability of secondary schools to accommodate growth beyond this level and that *‘none of the settlement extensions would be of a sufficient size to deliver a new secondary school’* (see Table 2.4). Our analysis indicates that this is not the case and that further work needs to be undertaken to consider the school capacity position insofar as this is presented as a constraint to growth. Warrington Borough Council acknowledges a number of factors affecting the education context though has yet to present data or analysis to demonstrate that these have been taken into account in concluding the scale of development achievable:

- The relationship with nearby secondary schools has not been fully considered (see Issue 1, page 17) – the secondary schools considered in Warrington Borough Council’s analysis in relation to the settlements taken into account in this analysis were Culcheth High School and Lymm High School. There are a further 3 in Salford, Trafford and Wigan authorities which have not been considered by the Council but which are situated within the Department for Education’s recommended maximum secondary school distance (3 miles). Capacity at these schools and the relationship with Warrington geographies should be taken into account;
- Pupils travelling from surrounding local authorities are not acknowledged in the Area Profiles which inform the PDO (see Issue 2, page 18) – this is particularly important in relation to Culcheth High School which has a strong catchment relationship with both Wigan and Salford authority areas. Warrington Borough Council indicates that there will be a release of secondary place pressure in outlying settlements as a result of 2 new secondary schools proposed for the urban area. However, changes within central Warrington are less likely to affect Culcheth High School than others in the borough. This is not explored by the Council in informing its conclusions; and
- The relationship between central Warrington and Lymm is not explored fully (see Issue 3, page 20) – a high number of pupils attending Lymm High School live within the main urban area. Warrington Borough Council has acknowledged this relationship indirectly in its assumption that provision of new secondary schools within the urban area will have a knock on effect on schools elsewhere and *‘help alleviate some of this pressure’* (see Table 2.4). However, the Council has not presented any data or analysis into the

impacts and resulting school places made available in schools such as Lymm High School.

Second, Warrington Borough Council arrives at its PDO based on its conclusion that the level of growth under the 'sustainable settlement' option will not be of a sufficient scale to warrant delivery of new secondary school provision in outlying settlements. However, our analysis indicates that even the 'incremental growth' scenario would lead to the requirement for a new secondary school (see Table 5.4). and so this is not a reason to cap growth at this level,

The analysis in this report demonstrates that school demand under 'incremental growth' cannot be met through existing school provision (see paragraph 4.16). The Council indicates that new provision in the urban centre will '*alleviate some of this pressure*' (see Table 2.4). However, our analysis shows that Culcheth High School operates quite separately from the urban centre and draws pupils from elsewhere. Therefore, any new provision in the urban centre is unlikely to have a material impact on the level of demand for places at Culcheth.

Ultimately the 10% growth under the PDO is arbitrary (see Issue 6, page 26) and does not reflect the heterogeneous nature of school catchments and the factors which influence them. Our analysis indicates that a more appropriate approach would be to reflect each geography individually, taking into account their specific catchments and other influencing factors as described under the first point previously. For example:

- Culcheth High School is nearing capacity and would benefit from a higher level of growth so as to enable the delivery of an extension and/or a new small secondary school at Croft. Schools of under 600 pupils already exist within the Borough and 5% of schools across England are under this size. Therefore the case for not enabling a higher level of growth on the grounds that '*none of the settlement extensions would be of sufficient size to deliver a new secondary school*' (see Table 2.4) is unsubstantiated; and
- Lymm High School is expected to have additional capacity as a result of new provision in the urban area. However, further work needs to be undertaken by Warrington Borough Council to demonstrate the level of capacity this will generate at Lymm High School and therefore the level of development which can be accommodated.

The Council has not yet fully considered the factors affecting education provision,. Our analysis makes the following conclusions:

- **The incremental growth option delays the need to address secondary school capacity issues at Lymm and Culcheth High School** – The assumption behind the incremental growth option is that development can largely be accommodated in existing infrastructure. However, given the current capacity issues a broader scale consideration of secondary school capacity of Lymm High School and Culcheth High School is needed. Each school has unique demand pressures which need to be considered;
- **An alternative spatial approach could generate demand for and sustain a new school** – Higher housing growth in Culcheth, Croft or Glazebury could justify and potentially fund an extension to Culcheth High School or an additional smaller secondary school to support the school. Such an approach reflects that taken by the Council to primary education in establishing the scale of demand for this option. A

review should involve Salford and Wigan to understand changes in these areas as some of the pupils attend from outside of the borough;

- **The Local Plan Review presents an opportunity to think more strategically about school capacity** – Currently the evidence base is limited as infrastructure is considered by settlement and is reactive to housing growth scenarios. A quality school system is integral to the long term growth ambitions of Warrington. Undertaking a full and integrated review of school capacity across the whole borough, drawing on the specific catchments and influencing factors, will ensure that the Council base any growth decisions on robust information; and
- **School capacity should not be a limiting factor to housing growth** – Meeting housing need should be the first consideration. This can subsequently “unlock” key strategic education facilities. For example, through land and funding through S106. School infrastructure should not be considered as a barrier to growth.

In taking a headline approach to education provision and setting a homogenous level of growth for the outlying settlements, the Council has not fully considered the growth potential of these locations or to support the development of a sustainable education infrastructure for the future.

1. Introduction

Purpose of the Report

- 1.1 Warrington Borough Council is currently undertaking a review of its Local Plan. From 18 July 2017 to 29 September, consultation responses can be submitted on the Preferred Development Option (PDO) for the Borough. Comments are invited on the evidence base and conclusions regarding Warrington's need for new homes and jobs.
- 1.2 This report has been commissioned by Peel Holdings (Management) Ltd ("Peel") to inform a consultation response on the PDO of the Council. It sits within a wider suite of technical documents which were produced to inform Peel's representations to this consultation.
- 1.3 The report specifically considers the methods and conclusions relating to school capacity in the outlying settlements. The purpose of this analysis is to assess the evidence and critique the methodology for selecting the PDO.

Structure

- 1.4 The remainder of the report is structured as follows:
 - **Chapter 2: Local Plan Consultation** – Review of evidence and the Council's position regarding the capacity of schools and community infrastructure. The purpose is to establish the rationale for selecting Option 2 'incremental growth' as the PDO for the outlying settlements;
 - **Chapter 3: Review of Primary Capacity** – The current and future capacity of primary schools is reviewed to establish the current direction of travel, in the absence of Local Plan growth;
 - **Chapter 4: Review of Secondary Capacity** - The current and future capacity of secondary schools is reviewed to establish the current direction of travel, in the absence of Local Plan growth;
 - **Chapter 5: Developing a More Robust Approach** – A series of issues are presented regarding the way secondary school capacity has been considered by Warrington Borough Council. This section calls for a more strategic and holistic approach to secondary school planning; and
 - **Chapter 6: Conclusion** – Summary of the analysis and implications of the identified issues.

2. Local Plan Consultation

- 2.1 Chapter 2 explores how the PDO was chosen and considers the education evidence base and rationale behind selecting Option 2 'Incremental Growth'.

Establishing the Preferred Development Option

- 2.2 Warrington Borough Council published 'Preferred Development Options' for Regulation 18 Consultation in July 2017.

- 2.3 In developing the PDO four stages were taken by the Council. After defining the need / land requirements (Stage 1) and strategic objectives for the plan (Stage 2), three '**high level spatial options**' were considered (Stage 3)¹:

- **Option 1:** Green Belt release only in proximity to the main Warrington urban area;
- **Option 2:** Majority of Green Belt release adjacent to main urban area with incremental growth in outlying settlements (*preferred option*); and
- **Option 3:** Settlement extension in one or more settlements with remainder of growth adjacent to the main urban area.

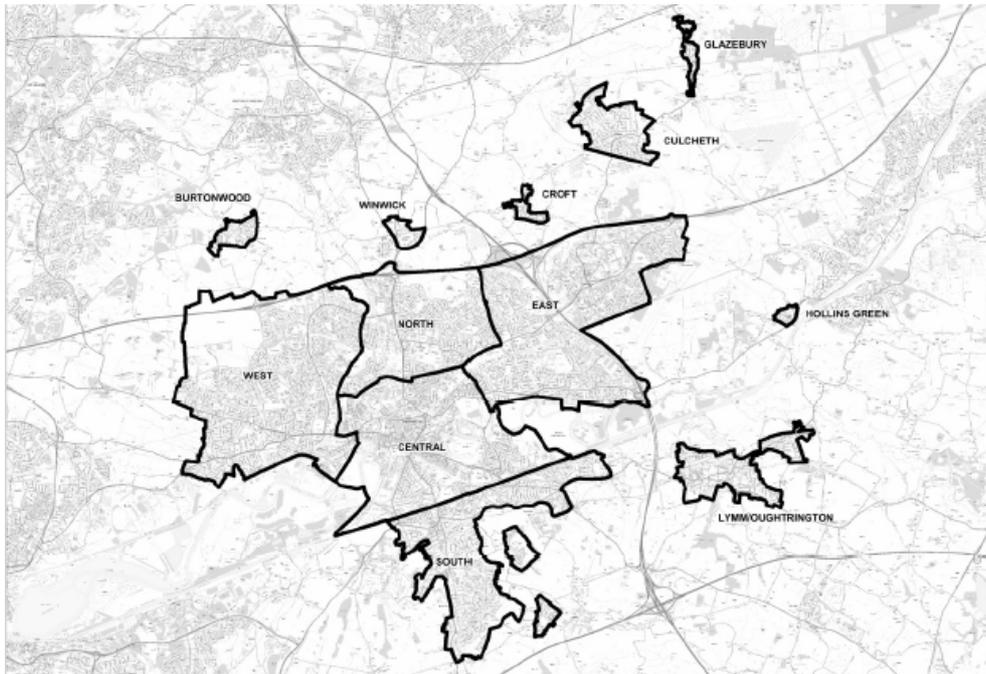
- 2.4 All three Spatial Options maximise Warrington town's urban capacity, the difference is their approach to the allocation of Green Belt land for housing. The Council states that from the number of potential development sites submitted, all three Spatial Options would be numerically capable of accommodating the level of future development in the borough.

- 2.5 Stage 4 involved assessing the options for main development locations, but is not considered as part of Turley's report.

- 2.6 For the purposes of Turley's assessment and demonstrating the key issues in the Council's approach, the settlements tested are those in which Peel has site interests (Croft, Culcheth, Hollins Green and Lymm) as well as Glazebury which is a relevant distance from Culcheth for education provision. These are shown in the figure overleaf.

¹ Page 20, Warrington Borough Council (2017) Preferred Development Option

Figure 2.1: Locations for which Area Profiles have been prepared



Source: Warrington Borough Council (2017) *Area Profiles and Options Assessment - Technical Note*

Options Appraisal Process

Overview of the process

2.7 The consideration of options in Stage 3 is supported by evidence presented in ‘**Settlement Profiles – Outlying Settlements**’ and ‘**Settlement Profiles – Main Urban Area**’ (also referred to here as ‘Area Profiles’). The Area Profiles have been prepared by Warrington Borough Council in consultation with the Council’s education team, public health teams and Warrington Clinical Commissioning Group. The purpose of the Area Profiles are twofold:

- First, **assess existing infrastructure provision**. This includes a review of primary and secondary education, health facilities and recreation space²; and
- Next, assess **the implications of the different ‘growth scenarios’** on the infrastructure which has been identified.

2.8 For the outlying settlements, the Council has applied the following assumptions in defining the ‘**growth scenarios**’. Table 2.1 shows how infrastructure requirements define the scale of development in each growth scenario.

² P.20, Warrington BC (2017) Preferred Development Option – Consultation

Table 2.1: Assumptions outlined by Warrington Borough Council behind the growth scenario

Growth Scenario	Assumption used to define the scale of growth	Further information provided by the Council
Incremental growth	Based on a <u>level of development that could be accommodated by existing infrastructure</u> , subject to minor expansion of that infrastructure, up to 10% of settlement size;	"The 10% limit in relation to settlement size is to ensure development is being capable of being accommodated without changing the character of the respective settlement under the 'incremental growth' scenario" (<i>Para 1.11</i>)
Sustainable settlement extension	Based on a <u>new or expanded primary school</u> , taking into account available sites; and	"A primary school has been used as the focus of a settlement extension given that primary school provision is most sensitive to housing growth and has the most localised catchment of all of the key local services. Other infrastructure provision will be dependent on the scale of the extension, the provision of existing infrastructure and the forecast capacity of that infrastructure" (<i>Para 1.12</i>)
Site Maximisation	Where there are <u>'call for site' options / Green Belt SHLAA sites</u> which could provide a larger scale extension.	"Under the 'Site Maximisation' scenario, there is no percentage limit to settlement growth" (<i>Para 1.13</i>)

Source: Warrington Borough Council (2017), *Area Profiles and Options Assessment – Technical Note*

- 2.9 The assumptions outlined in the table above form the basis for the Council's estimate of the number of homes to be built within each growth scenario. The number of dwellings within each growth scenario as identified by the Council in the Area Profiles, for the settlements considered in this review, are as follows:

Table 2.2: Growth scenarios for outlying settlements

Settlement	Number of dwellings		
	'Incremental Growth'	'Sustainable Settlement Extension'	'Site Maximisation'
Croft	60	350 (or 1,400 under 'major settlement extension**')	2,500
Culcheth	370	1,470	5,070
Glazebury	67	367	n/a
Hollins Green	40	350	1,200
Lymm	600	1,500	5,100
Total	1,137	4,037 (or 5,087)	13,870

*An additional growth scenario is proposed for Croft in the Area Profiles

Source: Warrington Borough Council (2017) Settlement Profiles - Outlying Settlements

- 2.10 The findings then helped to define the 'high level spatial options' (referred to as 'Spatial Options' hereafter). The assumed relationship between the Spatial Options and growth scenarios is illustrated below (relationship is not explicitly stated in the Council's documentation).

Table 2.3: Assumed relationship between spatial options and growth scenarios

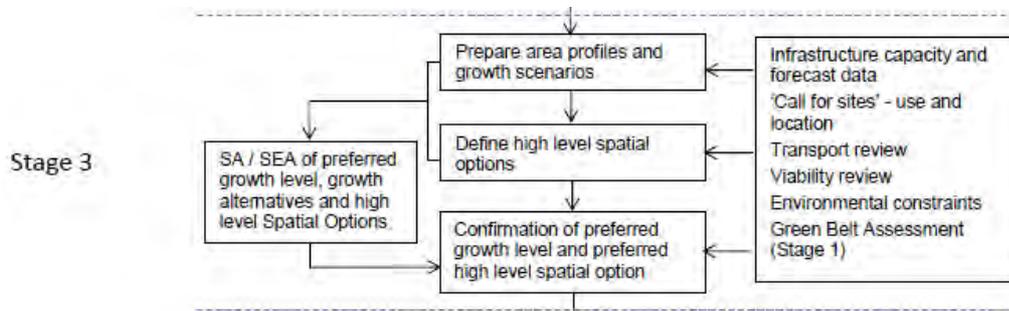
Growth Scenario <i>Evidence base</i>		Spatial Option <i>Policy option for consultation</i>
No growth scenario tested	→	Option 1: Green belt release
Incremental Growth	→	Option 2: Green belt release and incremental growth
Sustainable settlement extension	→	Option 3: Settlement extension
Site maximisation	→	No option considered

Source: Turley Economics (2017); Warrington Borough Council (2017)

- 2.11 Following this exercise the Council went through a process of confirming the preferred Spatial Option. The option testing process was informed by the Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) Process.

- 2.12 This overall process of evidence gathering to inform the preferred option is summarised as follows:

Figure 2.2: Assessment of high level spatial option to accommodate development



Source: Warrington Borough Council (2017) Preferred Development Option

Basis for selecting the Preferred Option

Findings from the interim Sustainability Appraisal

- 2.13 The Sustainability Appraisal (SA) was undertaken by AECOM. This is an interim report which can be updated throughout the plan making process.
- 2.14 The interim report sets out 18 SA objectives, a “SA Framework”. Each of the Options is tested against this framework in order to reach a conclusion about which Spatial Option performs best.
- 2.15 Appendix B of the SA details the appraisal undertaken for each of the Spatial Options. The analysis on education and schools is very limited and does not discuss the capacity of schools in any detail.

Findings from overall Options Assessment

- 2.16 Appendix 1 of the ‘Area Profile and Options Assessment Technical Note’ summarises the assessment of the current capacity of existing social infrastructure and the implications of each growth scenario. Extracts of relevance to Turley’s consultation response are included in Table 2.4. This has helped the Council to define each Spatial Option and the implications for social infrastructure.
- 2.17 No issues were identified with regards to additional primary level provision needed under each Spatial Option. However, for secondary education the Council identified that Spatial Option 3 “may result in secondary school capacity issues”³.
- 2.18 The growth scenario of “site maximisation” has not been translated into a Spatial Option for consideration.

³ Page 31, Warrington Borough Council (2017) Preferred Development Option

Table 2.4: Provision to accommodate the High Level Spatial Options [Warrington Borough Council wording]

High Level Spatial Option	Primary Schools	Secondary Schools
<p>Spatial Option 1. All growth accommodated adjacent to main urban area</p>	<p>"A number of new primary schools will be required in the urban area".</p>	<p>"Up to two new secondary schools will be required in the urban area".</p>
<p>Spatial Option 2. Majority of growth accommodated adjacent to main urban area with incremental growth in settlements</p>	<p>"In addition to above, the outlying settlements will require extensions to a limited number of primary schools".</p>	<p>"Opportunities to provide additional secondary school capacity outside of the main urban area maybe limited. Incremental development in the outlying settlements will therefore place further pressures on secondary schools which already have limited capacity. Up to 2 additional secondary schools in the main urban area, required under this option, may help alleviate some of this pressure".</p>
<p>Spatial Option 3. Growth accommodated adjacent to main urban area complemented by a sustainable extension to one or more settlements and incremental growth to remaining settlements</p>	<p>"<u>A settlement extension may require the delivery of a new primary school</u> if an extension was to be provided in Lymm, Culcheth or Croft or the extension of an existing primary school onto a development site in Burtonwood. The number of new primary schools required to support growth adjacent to the main urban area will be lower, in line with the lower level of development being located adjacent to the main urban area under this option".</p>	<p><u>"None of the settlement extensions would be of sufficient size to deliver a new secondary school".</u> The provision of a settlement extension would therefore place additional pressure on existing secondary schools serving the outlying settlements, over and above that for the incremental growth option. <u>Reducing the level of development adjacent to the main urban area might also compromise [sic] the ability for new development to provide an additional secondary school adjacent to the main urban area".</u></p>
<p>Spatial Option 4 – Maximising sites in outlying settlements (<i>high growth option not considered</i>)</p>	<p><i>Option 4 was not considered in WBCs assessment</i></p>	

Source: Warrington Borough Council (2017) Area Profiles and Options Assessment - Technical Note (**our emphasis**)

Summary of Warrington's Preferred Development Approach

The Council's main conclusion regarding the Preferred Development Option is as follows:

*"Option 2 enables the majority of growth to be delivered adjacent to the main urban area, contributing positively to the Plan Objectives. It performs stronger than Objective 1 in that it also **enables incremental housing growth in the outlying settlements to support local services** and widen local housing choice without compromising their character. This will also assist in overall Plan delivery by promoting a larger number of smaller sites which are likely to be deliverable early in the Plan period.*

Option 3 does not perform as strongly as the distribution of growth will begin to impact on the character of one or more of the outlying settlements and a greater proportion of growth is being moved away from the main urban area where it can most positively contribute to the Warrington New City concept⁴.

The technical assessment provides more detailed information as to why Option 3 was not chosen. The reasons illustrate that secondary education capacity was identified as a key issue:

- This option "may result in secondary school capacity issues"⁵;
- "None of the settlement extensions would be of sufficient size to deliver a new secondary school"⁶; and
- "Reducing the level of development adjacent to the main urban area might also compromise the ability for new development to provide an additional secondary school adjacent to the main urban area"⁷.

While additional primary school provision is required under all 3 options reviewed, these are not indicated by the Council to be a limiting factor.

These findings regarding secondary education form the basis of our critique outlined in Chapter 5.

⁴ Warrington Borough Council (2017) Preferred Development Option

⁵ *ibid*

⁶ Appendix 1 Warrington Borough Council (2017) Area Profiles and Options Assessment – Technical Note

⁷ *ibid*

3. Review of Primary School Capacity

- 3.1 This section presents the Council's analysis of primary school capacity, under each of the four growth scenarios for the outlying settlements. This draws on information provided in '**Settlement Profiles – Outlying Settlements**'.
- 3.2 For context at the start of the chapter, we provide a review of current primary school capacity and consider how this is forecast to change in the absence of Local Plan growth. The purpose is to test the baseline position presented by the Council.

Approach to assessing primary school capacity

- 3.3 Primary Schools often have a localised influence as their catchment areas are smaller relative to secondary schools. The surplus capacity of primary schools is therefore sensitive to local population change and the development of new homes in the local area.

Local School Infrastructure

- 3.4 There are a total of **11 primary schools** across Lymm, Culcheth, Croft, Hollins Green and Glazebury⁸. These schools have been considered in the Council's review of school capacity in the Area Profile each of settlements. There are other primary schools close by but these are within the Warrington town urban area and are geographically separate so they are discounted from our analysis.

Review of School Capacity

Current scenario (2017)

- 3.5 Currently, there is limited capacity at local primary schools to accommodate any additional housing growth in Lymm, Culcheth, Croft, Hollins Green and Glazebury.
- 3.6 Across the 11 schools there is only a small amount of surplus capacity. According to the latest data, there is a **surplus of 28 places** or a **surplus of 55 places** once the deficit is taken to be zero^{9,10}. Primary schools in Lymm have the greatest surplus capacity; 17 surplus places (38% of surplus capacity once the deficit is taken as zero).
- 3.7 Overall 55 surplus places across all 11 schools are able to accommodate pupils from **183 additional dwellings**¹¹. This is summarised in the table overleaf.

⁸ Close proximity to Culcheth and is therefore included in our analysis

⁹ In accordance with Audit Commission (1997) Trading Places: A Management Handbook on the Supply and Allocation of School Places

¹⁰ Department for Education (2017) January 2017 School Census

¹¹ Calculated using pupil yield ratio from Warrington Borough Council (2017) Planning Obligations Supplementary Planning Document (adopted Jan 2017)

Table 3.1: Summary of Current Scenario (2017)

Settlement	Number of primary schools	Capacity	NOR	Surplus Capacity	Surplus Capacity (deficient as zero)	Estimated number of dwellings supported
Lymm	4	1,260	1,243	17	21	70
Croft	2	398	408	-10	11	37
Culcheth	3	639	638	1	3	10
Hollins Green	1	140	136	4	4	13
Glazebury	1	131	115	16	16	53
Total	11	2,568	2,540	28	55	183

Source: DfE, Jan School Census (2017)

Future scenario (2021+): Counterfactual

- 3.8 The counterfactual forecast position has been calculated by Turley based on the percent change forecast by school planning area. This data (School Capacity – SCAP – data, 2017), was provided to us by Warrington Borough Council¹². We have applied this change to each school to identify the level of surplus or deficit for each outlying settlement.
- 3.9 In 2021-22 there will still be limited capacity at local primary schools to accommodate additional housing growth in Lymm, Culcheth, Croft, Hollins Green and Glazebury¹³.
- 3.10 The future scenario for 2021-22 is considered to be the 'counterfactual', or amount of surplus capacity in the absence of Local Plan housing growth or any additional school places being provided. The number of children at primary school in Culcheth and Croft are forecast to decrease by 13%. The number of children at primary school in Hollins Green is forecast to decrease by 3%. Pupils at primary school in Lymm are forecast to increase by 5%¹⁴. Overall, this results in a **surplus of 209 places** or a **surplus of 236 places** once the deficit is taken to be zero¹⁵.
- 3.11 This equates to approximately **798 additional dwellings across the settlements considered in our analysis**¹⁶. This is summarised in the table below.

¹² Warrington Borough Council has access to individual school level forecasts but did not provide this.

¹³ The future scenario for the year 2021-22 has been considered; this is the year for which the latest data is available. Data available from: Warrington Borough Council (2017) School Capacity Survey 2017-2018

¹⁴ *ibid*

¹⁵ The deficit of zero is calculated by assuming that the primary schools can continue to operate with the same number of deficit places as demonstrated in 2017.

¹⁶ Calculated using pupil yield ratio from Warrington Borough Council (2017) Planning Obligations Supplementary Planning Document (adopted Jan 2017)

Table 3.2: Summary of Future Scenario (2021+)

Settlement	Number of primary schools	Capacity	NOR	Surplus Capacity	Surplus Capacity (deficient as zero)	Estimated number of dwellings supported
Lymm	4	1,260	1,206	54	58	192
Croft	2	398	355	43	64	214
Culcheth	3	639	555	84	86	288
Hollins Green	1	140	143	-3	0	0
Glazebury	1	131	100	31	31	103
Total	11	2,568	2,259	209	236	798

Source: DfE, Jan School Census (2017) Note: Some figures do not appear to sum due to rounding

Growth scenario (2021+): Incremental Growth

- 3.12 The 'incremental growth' scenario below details the position presented by the Council in the Area Profiles. No data was presented by the Council in this regard.
- 3.13 It is estimated that the incremental growth scenario will generate **1,137 additional dwellings** across all five villages¹⁷ (see Table 2.2).
- 3.14 This level of growth is defined by the scale of development which can be accommodated by existing infrastructure up to 10% of settlement size (assumptions outlined in Table 2.1).
- 3.15 Warrington Council identifies that *'the outlying settlements will require extensions to a limited number of primary schools'* under this scenario (see table 2.4). This broadly accords with our findings in relation to the 'counterfactual' position which identified that there will be a primary place surplus sufficient to accommodate a lower level of growth (798 dwellings).
- 3.16 The Area Profile outlines the amount of additional primary school capacity which is required to support this growth scenario. In order to deliver this level of development it will be necessary to expand 6 out of the 11 primary schools across all five settlements:
- St Lewis Catholic Primary School;
 - Newchurch Community Primary School;
 - Glazebury CE Aided Primary School;
 - Hollins Green St Helens CE Aided Primary School;
 - Cherry Tree Primary School; and

¹⁷ Warrington Borough Council (2017) Settlement Profiles: Outerlying Settlements

- Statham Community Primary School

3.17 The Council does not identify primary school capacity to be a limiting factor in delivering growth under this growth scenario (see Table 2.1).

Growth scenario (2021+): Sustainable Settlement Extension

3.18 The ‘sustainable settlement extension’ scenario below details the position presented by the Council in the Area Profiles. No data was presented by the Council in this regard.

3.19 It is estimated that the sustainable settlement extension growth scenario will generate **4,037 (or 5,087) additional dwellings** across all five villages¹⁸ (see Table 2.2).

3.20 This level of growth is defined by the scale of development needed to support a new or expanded primary school (assumptions outlined in Table 2.1).

3.21 The Area Profiles outline the amount of additional primary school capacity which is required to support this growth scenario. Additional education infrastructure required includes¹⁹:

- Half Form Entry (FE) expansion at both primary schools in Croft
- New 2 FE school in Culcheth
- Half FE expansion at Glazebury Primary School; and
- New 2 FE school in Lymm

3.22 The Council does not identify primary school capacity to be a limiting factor in delivering growth under this scenario (see Table 2.1).

Growth scenario (2021+): Site Maximisation

3.23 The ‘site maximisation’ scenario below details the position presented by the Council in the Area Profiles. No data was presented by the Council in this regard.

3.24 It is estimated that the site maximisation growth scenario will generate **13,870 additional dwellings** across all five villages²⁰ (see Table 2.2).

3.25 This level of growth is defined by ‘call for site’ options / Green Belt SHLAA sites. (assumptions outlined in Table 2.1).

3.26 The Area Profiles outline the amount of additional primary school capacity which is required to support this growth scenario. Additional education infrastructure includes²¹:

- New 3 FE primary school in Croft;
- 3 new primary schools in Culcheth (size not specified);

¹⁸ Warrington Borough Council (2017) Settlement Profiles: Outerlying Settlements

¹⁹ *ibid*

²⁰ Warrington Borough Council (2017) Settlement Profiles: Outerlying Settlements

²¹ *ibid*

- New 1.5 FE primary school in Glazebury; and
 - 3 new primary schools in Lymm (size not specified)
- 3.27 The Council does not identify primary school capacity to be a limiting factor in delivering growth under this scenario (see conclusions in Table 2.1). Warrington Borough Council does not translate this growth scenario into a Spatial Option in the Preferred Development Option consultation document (see Table 2.4).

Summary of Primary School Capacity

Now (2017) and in the future (2021-22) there is limited capacity to accommodate additional housing growth at the primary schools in Lymm, Culcheth, Croft, Hollins Green and Glazebury.

Warrington Borough Council has recognised the existing and forecast primary school capacity issues in 'Settlement Profiles – Outlying Settlements' (or 'Area Profiles'). Therefore for each growth scenario and subsequent High Level Spatial Option, expansions or new facilities are identified, as shown in Table 3.3.

Regardless of these additional capacity needs, primary school infrastructure is not identified by Warrington Borough Council as a limiting factor for housing growth.

Table 3.3: WBC's consideration of Primary Schools

Spatial Option	Conclusions made in 'Area Profiles and Options Assessment - Technical Note' (see Table 2.4)	Proposed Mitigation in outlying settlements
Spatial Option 1: Growth adjacent to main urban area	"A number of new primary schools will be required in the urban area".	n/a
Spatial Option 2: Incremental growth in outlying settlements	"In addition to above, the outlying settlements will require extensions to a limited number of primary schools"	 <i>Expansion identified at 6 schools across Lymm, Culcheth, Croft, Hollins Green and Glazebury</i>
Spatial Option 3: Sustainable extension to outlying settlements	"A settlement extension may require the delivery of a new primary school if an extension was to be provided in Lymm, Culcheth or Croft or the extension of an existing primary school onto a development site in Burtonwood. The number of new primary schools required to support growth adjacent to the main urban area will be lower, in line with the lower level of development being located adjacent to the main urban area under this option".	 <i>New schools and expansion identified in Area Profiles</i>

Source: Area Profiles, 2017

A higher growth scenario, 'site maximisation', was tested in the Area Profile for each settlement. Warrington concluded that this level of growth can still be met through new or expanded primary schools. This scenario was not taken forward into a Spatial Option by the Council.

4. Review of Secondary School Capacity

- 4.1 This section presents the Council's analysis of secondary school capacity, under each of the four growth scenarios for the outlying settlements. This draws on information provided in '**Settlement Profiles – Outlying Settlements**'.
- 4.2 For context at the start of the chapter, we provide a review of current secondary school capacity and consider how this is forecast to change in the absence of Local Plan growth.

Approach to assessing school capacity

- 4.3 The assessment of secondary school capacity is more complex than for primary due to wider catchment areas, cross local authority boundary movement and stronger influence of school performance on parental choice. An assessment of secondary school capacity therefore needs to be more holistic and consider the full range of factors which determine existing and future surplus capacity.

Local School Infrastructure

- 4.4 Children living in Croft, Culcheth and Glazebury mostly attend **Culcheth High School**. Children living in Lymm attend **Lymm High School**, while children living in Hollins Green attend both²².
- 4.5 Beyond these two schools, there are 3 other schools located in the surrounding area which children from the outer settlements could attend due to their proximity; Birchwood Community High School, King's Leadership Academy Warrington and University Academy Warrington. These are not considered in Warrington Borough Council's analysis. We consider these schools later in our report (see Chapter 5).

Current scenario (2017)

- 4.6 Currently, there is limited capacity at the secondary schools which support children living in Lymm, Culcheth, Croft, Hollins Green and Glazebury.
- 4.7 Across both Culcheth and Lymm schools there is some surplus capacity; according to the latest data there is a **surplus of 175 places**²³. This could support children from an additional **972 additional dwellings** (256 at Lymm High School and 717 at Culcheth High School)²⁴. This is summarised in the table overleaf.

²² According to Pupil Heat Maps by SchoolsGuide.co.uk

²³ Department for Education (2017) January 2017 School Census

²⁴ Calculated using pupil yield ratio from Warrington Borough Council (2017) Planning Obligations Supplementary Planning Document (adopted Jan 2017)

Table 4.1: Summary of Current Scenario (2017)

Settlement	Number of secondary schools	Capacity	NOR	Surplus Capacity	Surplus Capacity (deficient as zero)	Estimated number of dwellings supported
Lymm	1	1,909	1,863	46	46	256
Culcheth	1	1,240	1,111	129	129	717
Total	2	3,149	2,974	175	175	972

Source: DfE, Jan School Census (2017)

Future scenario (2023+): Counterfactual

- 4.8 The counterfactual forecast position has been calculated by Turley based on the percent change forecast by school planning area. This data (School Capacity – SCAP – data, 2017), was provided to us by Warrington Borough Council²⁵. We have applied this change to each school to identify the level of surplus or deficit for each outlying settlement.
- 4.9 In 2023-24 there will be limited capacity at local secondary schools to accommodate additional housing growth in Lymm, Culcheth, Croft, Hollins Green and Glazebury²⁶.
- 4.10 The future scenario for the year 2023-24 has been considered. This is the year for when the latest data is available. The scenario in the absence of expansion as a result of Local Plan allocations is considered as a 'counterfactual'. The growth in number of secondary school pupils, in Warrington, before growth options are taken into account, results in a **deficit of 118 places**²⁷. This is as a result of Lymm High School having a deficit of 144 places. Culcheth High School is anticipated to have a small surplus of 26 places which equates to demand from approximately **144 additional dwellings**. This is summarised in the table below.

Table 4.2: Summary of Forecast Scenario (2023+)

Settlement	Number of secondary schools	Capacity	NOR	Surplus Capacity	Estimated number of dwellings supported
Lymm	1	1,909	2,053	-144	0
Culcheth	1	1,240	1,214	26	144
Total	2	3,149	3,267	-118	144

²⁵ Warrington Borough Council has access to individual school level forecasts but did not provide this.

²⁶ The future scenario for the year 2023-24 has been considered; this is the year for which the latest data is available. Data available from: Warrington Borough Council (2017) School Capacity Survey 2017-2018

²⁷ Warrington Borough Council (2017) School Capacity Survey 2017-2018

Source: DfE, Jan School Census (2017)

- 4.11 The secondary schools can therefore only accommodate a small scale of growth which is significantly below the estimated dwellings for 'incremental growth' Option 2 (1,137 dwellings) and 'sustainable settlement extension' Option 3 (4,047-5,087 dwellings).

Growth scenario (2022+): Incremental Growth

- 4.12 The 'incremental growth' scenario below details the position presented by the Council in the Area Profiles. No data was presented by the Council in this regard.
- 4.13 It is estimated that the incremental growth scenario will generate demand for **1,137 additional dwellings** across all five villages (see Table 2.2).
- 4.14 This level of growth is defined by the scale of development which can be accommodated by existing infrastructure up to 10% of settlement size (see assumptions outlined in Table 2.1).
- 4.15 The Area Profiles outline the amount of secondary school capacity which is required to support this growth scenario. It is identified by Warrington Borough Council that expansion to secondary schools in outlying settlements is not possible, but:
- Additional pupils can be absorbed within the current capacity.
 - Two additional secondary schools in the main urban area, required under this option, may help alleviate pressure for places in the district therefore making 'incremental growth' viable (see Table 2.4).
- 4.16 Analysis by Turley shows that current secondary school capacity can support 972 additional dwellings (paragraph 4.7) and future capacity can support 144 dwellings (paragraph 4.10). **Secondary school capacity in Culcheth and Lymm therefore cannot support an additional 1,137 additional dwellings.**

Growth scenario (2022+): Sustainable settlement extension

- 4.17 The 'sustainable settlement extension' scenario below details the position presented by the Council in the Area Profiles. No data was presented by the Council in this regard.
- 4.18 It is estimated that the sustainable settlement growth scenario will generate demand for **4,037 additional dwellings** across all five villages (see Table 2.2).
- 4.19 This level of growth is defined by the scale of development needed to support a new or expanded primary school (see assumptions outlined in Table 2.1).
- 4.20 In this scenario the Council states that secondary schools are a limiting factor (see Table 2.2). The evidence from the Area Profile states the cumulative impact of all development sites in the outlying settlements will need to be considered further. For example, for Culcheth the Council states that:

"Whilst new pupils living in Culcheth may be accommodated there would be wider implications which would need to be considered in respect of the

*capacity of other secondary schools in north and east Warrington and in adjacent areas of Wigan and Salford*²⁸.

- 4.21 Warrington Borough Council does not identify additional infrastructure would be needed to support the level of housing growth under this growth scenario. It is concluded in the Preferred Development Options technical report that the level of growth would not be sufficient to require a new secondary school (see Table 2.4).

Growth scenario (2022+): Site maximisation

- 4.22 The 'site maximisation' scenario below details the position presented by the Council in the Area Profiles. No data was presented by the Council in this regard.
- 4.23 The site maximisation growth scenario is estimated to generate demand for **13,870 additional dwellings** across all five villages (see Table 2.2).
- 4.24 This level of growth is defined by 'call for site' options / Green Belt SHLAA sites which could provide a larger scale extension (see assumptions outlined in Table 2.1).
- 4.25 Warrington Borough Council identifies that the education infrastructure requirements to accommodate this scale of growth would be a major extension to an existing school or new secondary school in north and east of Warrington.

²⁸ Warrington Borough Council (2017) Settlement Profiles – Outlying Settlements

Summary of Secondary School Capacity

Currently (2017), Culcheth High School and Lymm High School only have a small amount of surplus capacity. In future years (2022-23), the surplus capacity at Culcheth High School will reduce and Lymm High School will have no spare places.

Warrington Borough Council indicates in 'Settlement Profiles – Outlying Settlements' that incremental growth can be met within existing secondary school capacity in the outlying settlements. Our assessment shows that there are not enough spare places at Culcheth or Lymm High Schools to accommodate this growth. Warrington Borough Council implies that new provision in the urban area will alleviate pressure at outlying schools. However, no data has been provided in the evidence base to support this (we explore this further in Chapter 5).

Their conclusions regarding the impact of the 'sustainable settlement extension' are less certain and state that the wider implications of higher housing growth in the outlying settlements would need to be considered further.

Secondary school infrastructure cannot accommodate 'incremental growth', despite the Council's conclusions. The Council considers secondary school capacity to be a limiting factor for a higher level of growth, but it has not interrogated the data to fully evidence its conclusions.

Table 4.3: WBC's consideration of Secondary Schools

Spatial Option	Conclusions made in 'Area Profiles and Options Assessment - Technical Note' (see Table 2.4)	Proposed Mitigation in outlying settlements
Spatial Option 1: Growth adjacent to main urban area	"Up to two new secondary schools will be required in the urban area".	n/a
Spatial Option 2: Incremental growth in outlying settlements	"Opportunities to provide additional secondary school capacity outside of the main urban area maybe limited. Incremental development in the outlying settlements will therefore place further pressures on secondary schools which already have limited capacity. Up to 2 additional secondary schools in the main urban area, required under this option, may help alleviate some of this pressure".	 <i>Additional pupils absorbed into existing capacity</i>
Spatial Option 3: Sustainable extension to outlying settlements	<u>"None of the settlement extensions would be of sufficient size to deliver a new secondary school.</u> The provision of a settlement extension would therefore place additional pressure on existing secondary schools serving the outlying settlements, over and above that for the incremental growth option. Reducing the level of development adjacent to the main urban area might also compromise the ability for new development to provide an additional secondary school adjacent to the main urban area".	 <i>Council states that "the wider implications need to be considered"</i>

Source: Area Profiles, 2017

The higher growth scenario, 'site maximisation', was tested in the Area Profile for each settlement. Warrington Borough Council concluded that this level of growth can be met through a new secondary school. This scenario was not taken forward into a Spatial Option.

5. Developing the Evidence and Planned Approach

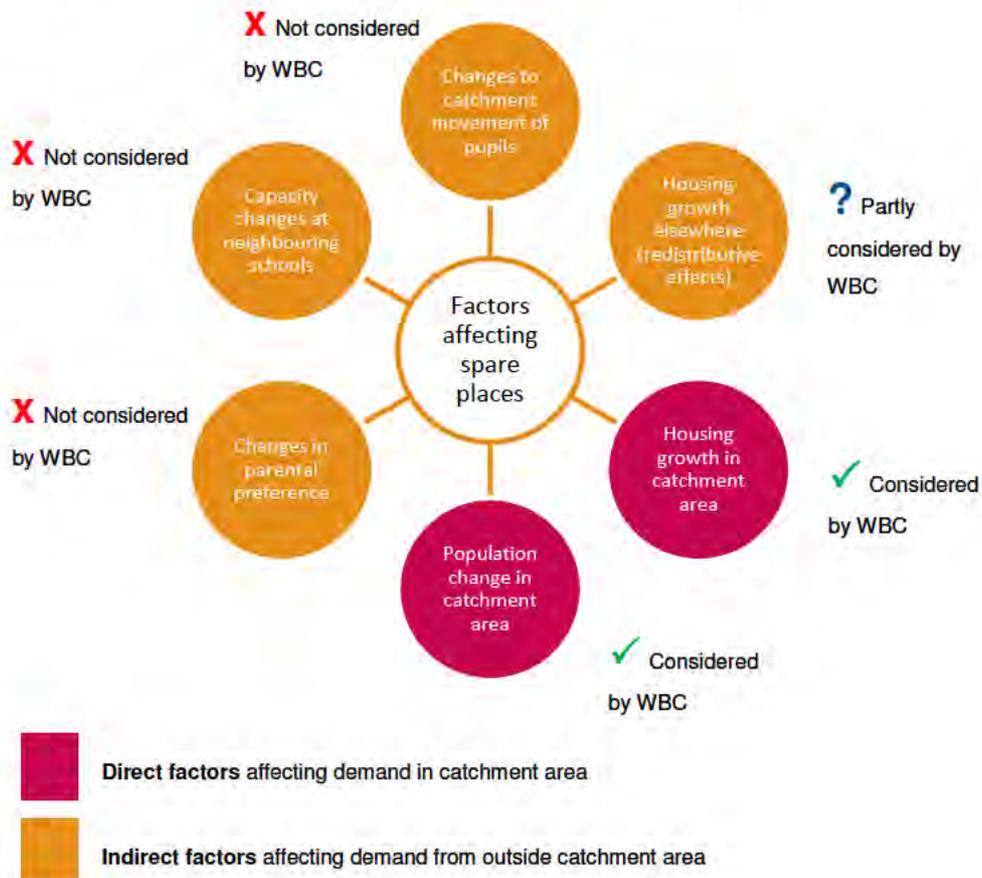
- 5.1 Secondary schools are indicated by Warrington Borough Council to be a limiting factor on the scale of growth that can be achieved in the borough. While additional primary provision is required under each scenario, this is not indicated to be a limiting factor for growth by the Council. This presents a divergence in approach by the Council between its consideration of primary and secondary education provision and the role of mitigation.
- 5.2 We consider that the Council has undertaken an overly **simplistic consideration of future capacity of secondary schools** that does not present the necessary level of information required to inform a significant decision such as provision of new homes to support the growing population. This section seeks to aid the Council by outlining how it can be proactive in planning sufficient secondary school places. A strategic reconsideration is required beyond simply expanding existing schools which serve the outlying settlements.
- 5.3 Warrington Borough Council has developed a valuable register of education facilities in the Area Profiles. These detail where school expansion is possible or not possible. This is a good first step, but the analysis is not taken further than this. Surplus capacity is considered based only on additional pupils, forecast growth and room for expansion. There are particular pressures on Lymm and Culcheth High Schools which need to be considered in greater detail as well as the ability for new schools to be provided to serve the outlying settlements in line with new housing. This section therefore calls for a more holistic approach to school planning for the area.
- 5.4 The issues presented consider both demand and supply issues which have been overlooked or not considered in depth. The following overarching points are made which would lead to a more robust approach and should be followed by Warrington Borough Council in providing a reliable evidence base:
- **Baseline assessment of supply and demand of places at Culcheth and Lymm High Schools is too simplistic** (*Issue 1 – 3*). There are both direct and indirect factors which affect spare capacity. These include; parental choice of schools; and population and/or school capacity changes in neighbouring local authorities and elsewhere in the borough;
 - **There is no strong basis behind the level of growth identified within the incremental growth option** (*Issue 4*) – Secondary schools throughout Warrington are growing at different rates. The assumption behind the 10% rate of growth is based on the capacity of existing infrastructure which appears arbitrary; and
 - **The approach to planning the future supply of places should be more holistic** (*Issue 5 and 6*) – The Council's approach is not future proofed; there is no flexibility if current patterns of demand or supply change. Culcheth and Lymm are already nearing capacity and incremental growth will simply perpetuate the

problem. Providing for a greater level of growth will enable provision to be effectively planned in a holistic and proactive way rather than in a piecemeal and reactive fashion.

Baseline assessment of Culcheth and Lymm High Schools

- 5.5 The number of spare places at a school can be affected by both direct factors (changes within catchment area) and indirect factors (change external to catchment area).
- 5.6 In the PDO evidence base, the Council at some points acknowledges these complex dynamics. For example, it is noted that housing growth in Lymm may lead to *“longer term change to the distribution of pupils”* and for Culcheth states that there are *“wider implications which would need to be considered in respect of the capacity of other secondary schools”*²⁹. However, a detailed analysis of such factors is not provided in the Council’s evidence base.
- 5.7 Both direct and indirect factors affect the number of spare places. Both need to be considered for Culcheth and Lymm High Schools in the Area Profiles. These are summarised below in Figure 5.1. Warrington Borough Council considers only two of these fully (direct factors), and one of these in part (an indirect factor).

Figure 5.1: Factors affecting spare places at secondary school



Source: Turley Economics, 2017

²⁹ Warrington Borough Council (2017) Settlement Profiles – Outlying Settlements

- 5.8 The following issues highlight where the approach to assessing demand for places could be better developed. The purpose is to suggest where the Council should carry out further analysis to inform the selection of the Preferred Development Option.

Issue 1: Relationship with nearby secondary schools is not fully considered in Area Profiles (methodological point)

The Area Profiles of Croft, Culcheth, Glazebury, Hollins Green and Lymm only consider the impact of the four growth scenarios on Culcheth High School and Lymm High School. Explicit consideration should be given to other secondary schools within a 3 mile catchment when testing the different growth scenarios.

- 5.9 The Department for Education considers 3 miles to be a reasonable distance to school for children 8 years and older³⁰. According to this definition, in addition to Lymm High School and Culcheth High School, Birchwood Community High School and University Academy Warrington could support pupils living in outlying settlements (see Table 5.1).
- 5.10 It is acknowledged that while the number of pupils attending Birchwood and University Academy from the five outlying villages is currently minimal³¹, this situation may change. For example, changing school performance can have a bearing on parental school preference. Research by University of Bristol confirms this relationship; they show that "the main characteristics that parents care about in a school are academic attainment, school socio-economic composition and travel distance"³². School catchment areas and school administrative boundaries may also change which would similarly have an impact on where pupils attend school.
- 5.11 Schools outside of the borough are also relevant to the assessment of secondary school capacity. In 2016, 1.1% of pupils living in Warrington attended school in other local authorities. There are three schools, Irlam and Cadishead College, Broadoak School and Bedford High School, which are within 3 miles of some of the outlying villages. These are within Salford, Trafford and Wigan boroughs respectively (see Table 5.1). Broadoak School is accessible only by the Warburton Toll Bridge and so the Irlam and Cadishead schools are likely to have the strongest relationships. These relationships require further consideration.

³⁰ Department of Education (2014) Home to School Travel and Transport Guidance - The Education Act 1996 suggests that a distance of 2 miles for a child under 8 years old and 3 miles for a child over 8 years old can be considered an appropriate maximum distance for a local school.

³¹ According to catchment data presented in 'pupil heat maps', SchoolsGuide.co.uk [accessed 22/08/2017]

³² (p. 32) Burgess, S. et al. (2009) What parents want: school preferences and school choice, University of Bristol and Institute of Education

Table 5.1: Secondary Schools within a 3 mile radius of outlying settlement

School	LA	Relevant outlying settlement ¹	Estimated distance (miles) ²
Schools already considered			
Culcheth High School	Warrington	Culcheth	0.8
		Croft	2.0
		Glazebury	1.4
Lymm High School	Warrington	Lymm	1.0
		Hollins Green	3.0
Additional schools within Warrington			
Birchwood Community High School	Warrington	Croft	2.8
		Culcheth	2.9
University Academy Warrington	Warrington	Croft	2.3
Additional schools outside of Warrington			
Irlam and Cadishead College	Salford	Hollins Green	2.1
Broadoak School	Trafford	Hollins Green	2.7
Bedford High School	Wigan	Glazebury	2.0

¹ Settlements within 3 miles

² Walking or driving distance

Source: Jan 2017 Census

- 5.12 While Warrington Borough Council does acknowledge this cross boundary relationship with other authorities³³ (see example in footnote) it has not presented any data or analysis with regards to this. Fuller consideration should be given to inform housing growth implications before selecting the PDO.

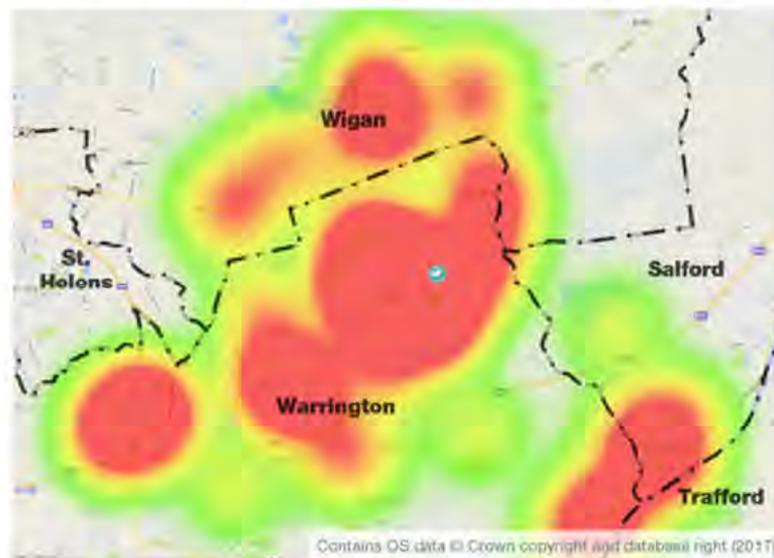
³³ "Whilst new pupils living in Culcheth may be accommodated there would be wider implications which would need to be considered in respect of the capacity of other secondary schools in north and east Warrington and in adjacent areas of Wigan and Salford" Warrington Borough Council (2017) Settlement Profiles – Outlying Settlements

Issue 2: Pupils travelling from surrounding local authorities is not acknowledged in Area Profiles (methodological point)

A high proportion of pupils attending Culcheth High School live in Leigh (Wigan Borough) and Cadishead (Salford Borough). Changes in supply of secondary school places and population growth within Wigan or Salford will have a subsequent impact on Culcheth High School. These external factors should be analysed for a more robust approach.

- 5.13 While the catchment area for Culcheth High School lies within Warrington Borough, a high number of pupils attending the school live in Leigh and Cadishead, which are located in the neighbouring districts of Wigan and Salford, respectively. The figure below illustrates the distribution of pupils attending Culcheth High School. The figures are not quantified due to the data disclosure agreement. This data is available to the education team at Warrington Borough Council.

Figure 5.2: Origin of pupils attending Culcheth High School



Pupil heat map key



Source: SchoolGuide.co.uk [accessed 22/08/2017]

- 5.14 The future number of pupils travelling from around Leigh and Cadishead could change affecting the resulting spare capacity at Culcheth High School. Spare places at Culcheth High can be impacted by the following factors:

- School expansion or closures within or around Leigh and Cadishead – *No evidence of school expansion or closures is publically available from Wigan or Salford;*
- Population growth in these areas due to increased birth rates - *Population in Wigan is forecast to increase by 5.0% from 2013-2026, and by 20% over the period 2014-2035 in Salford;*
- Increased number of pupils from new housing developments in neighbouring boroughs – *Policy SP1 of Wigan Core Strategy directs development towards Leigh; 24% of Wigan's total housing provision from 2011 to 2026 will be located at Leigh³⁴. The Salford draft Local Plan outlines an allocated site in Cadishead (Land west of Hayes Road) of 200 units³⁵. The Draft Greater Manchester Spatial Framework allocation WG2 for 2,250 homes on the edge of Cadishead requires land to be earmarked for primary and secondary provision. ELR4 allocation at Pocket Nook for 1,000 homes to the south of Leigh should also be considered;;*
- Increased number of pupils from new housing developments in Warrington Borough near to Culcheth High – *likewise, delivery of new homes close to the school will lead to a greater proportion of pupils on roll attending from the local area within Warrington Borough. New resident pupils will be able to take up places at the school over time due to proximity, in favour of those living further away.*

5.15 The assessment of future capacity of Culcheth High School requires a collaborative approach with Wigan Borough Council and Salford Borough Council. Factors which influence the number of pupils attending the school extend beyond the boundary of Warrington, and therefore should be analysed to ensure a more robust approach.

Issue 3: Relationship between central Warrington and Lymm is not fully explored (methodological point)

A high number of pupils who attend Lymm High School live within the main urban area of Warrington. The Council assesses secondary school capacity in two separate parts; outlying settlements and the urban centre. In the case of Lymm High School the analysis of the two areas cannot be separated. A more robust approach is to assess capacity by school, rather by settlement.

5.16 In the Area Profile of Lymm, Warrington Borough Council acknowledges that additional pupils in Lymm will have wider implications on the other schools in Warrington. For example, under incremental growth it is stated that increased pupil numbers will have the following impact:

“Whilst new pupils living in Lymm would be accommodated there could be wider implications which would need to be considered in respect of the capacity of other secondary schools in south and east Warrington”³⁶

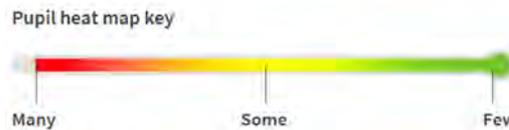
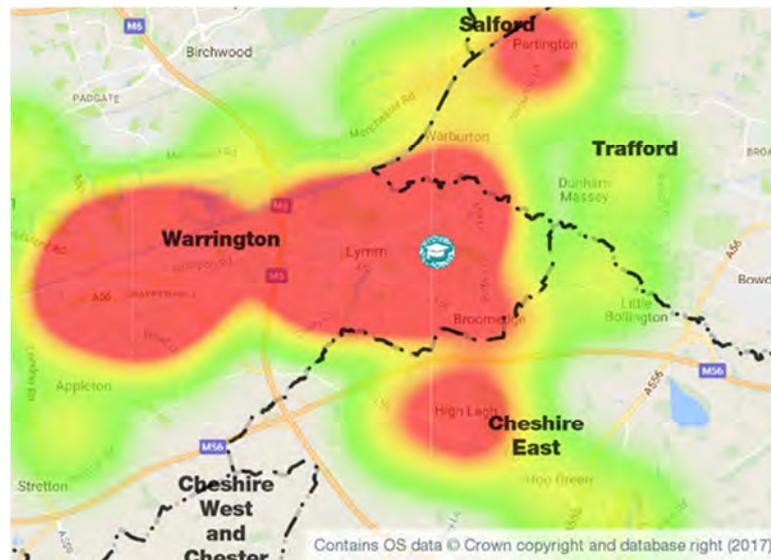
³⁴ Wigan Borough Council (2013) Local Plan Core Strategy

³⁵ Salford City Council (2016) Draft Local Plan

³⁶ Warrington Borough Council (2017) Settlement Profiles – Outlying Settlements

- 5.17 However, the acknowledgement of the interconnected nature of settlements and schools needs to be developed further and given greater consideration in analysis of impacts given the importance of this relationship.
- 5.18 The figure overleaf illustrates where pupils attending Lymm High School live. The map demonstrates that a high number of pupils live towards the centre of Warrington in the main urban area. The figures are not quantified due to the data disclosure agreement. This data can be accessed by the education team at Warrington Borough Council.

Figure 5.3: Origin of pupils attending Lymm High School



Source: SchoolGuide.co.uk

- 5.19 The supply of pupils at Lymm High School will therefore be impacted by changes to both school capacity and additional housing development in the urban area of Warrington. Each Spatial Option presented by Warrington Borough Council involves the growth of the central Warrington area; the PDO states that “the requirement to maximise urban capacity is a constant for each of the options”. The growth scenario for south Warrington ranges from an incremental growth of 2,268 dwellings to the preferred option for 7,000 new homes as part of a garden city suburb.
- 5.20 The Garden City Suburb in south Warrington has been chosen as the PDO for the urban area. A new secondary school and up to 4 new primary schools will be required to support the new housing development. The figure below shows that the location of the Garden City Suburb is where a high number of pupils attending Lymm High School currently live.

Figure 5.4: Comparison of Garden City Suburb footprint and location of where Lymm High School Pupils live



Source: Warrington Borough Council (2017); SchoolsGuide.co.uk (2016)

- 5.21 The new secondary school in the Garden City Suburb is likely to reduce the demand for school places at Lymm High School, therefore potentially increasing the surplus capacity and the ability to accommodate a greater number of pupils living in Lymm. Warrington Borough Council acknowledges this in its Area Profiles and Options Assessment – Technical Note (see Table 2.4) where it indicates that new provision in Warrington urban centre may alleviate pressure elsewhere.
- 5.22 Further scenario testing could be undertaken by Warrington Borough Council, before discounting a higher growth option at Lymm to fully understand the impacts of this new provision on capacity at Lymm. This will demonstrate whether a 10% increase makes sense in this outlying settlement.

Approach to school place planning should be more holistic

Issue 4: Future implications for Lymm High School need to be tested further

Given the number of pupils who attend Lymm from the urban area, the relationship between outlying settlements and Warrington town could be considered more thoroughly. The provision of additional schools in the centre may lead to more spare places at Lymm High School in the long term. While Warrington Borough Council broadly asserts this, it has not provided data or analysis on pupil number or specific pupil-school relationships.

- 5.23 Lymm High School is forecast to be operating at a deficit of 144 places by 2022-23. Additional homes from incremental growth will add to the capacity problem locally.
- 5.24 As shown in Issue 3, Lymm has a strong relationship with Central Warrington and draws a large proportion of pupils from the area in which the new Garden City Suburb is to be located. Warrington Borough Council recognises that the provision of 2 new schools

within Central Warrington 'may help alleviate some of this pressure' (see Table 2.4), though it does not specifically reference any schools in this regard or provide analysis of this impact.

- 5.25 To future proof school organisation planning, the Council could further test the implications of changing supply and demand of places in central Warrington.
- 5.26 Without considering this additional provision, our analysis indicates that under both incremental growth and sustainable settlement extension scenarios expansion of Lymm High School is likely to be required. Warrington Borough Council indicates that 'opportunities to provide additional secondary school capacity outside of the main urban area may be limited' (see Table 2.4), but no analysis of the potential to expand is presented in the evidence base. The only scenario which would lead to a new school is the site maximisation option.

Table 5.2: Additional pupils attending Lymm High School

Origin of pupils	Additional secondary school places required		
	Incremental Growth	Sustainable Settlement Extension	Site maximisation
Lymm	108	270	918
Total: number of pupils	108	270	918
Total: FE¹	1	2	6
Expansion or new school?	Expansion	Expansion	1 New School

¹ School assumed to cater for 11-16 year olds

Source: Area Profiles (2017); Turley Economics (2017)

Issue 5: The 'incremental spatial option' only delays a strategic review of capacity at Culcheth High School. Another secondary school to serve the outlying settlements may be needed.

Culcheth High School is operating close to a deficit. Its situation is unique; its pupils originate primarily from the local area and neighbouring local authorities and therefore its intake will remain unaffected by changes to secondary school capacity in central Warrington. Incremental growth in all five villages can only just be accommodated at the school, without room for flexibility. This is unlikely to be sustainable in the long term.

- 5.27 As Chapter 5 demonstrated, Culcheth High School is currently operating close to capacity with 129 spare places³⁷. By 2023 Culcheth will only have space for 26 additional pupils³⁸. The Area Profiles state that expansion potential is limited.

³⁷ Department for Education & Warrington Borough Council (2017) January School Census

³⁸ Department for Education & Warrington Borough Council (2017) School Capacity Survey 2017

- 5.28 Additional pupils moving to Croft, Culcheth, Hollins Green and Glazebury are likely to attend Culcheth High School (see Pupil Heat Map, Figure 5.2). Under the incremental growth scenario, the additional 537 dwellings across Croft, Culcheth, Hollins Green and Glazebury are likely to require 97 secondary school places³⁹. This scenario will lead to a deficit of places at Culcheth, as there is only space for 26 pupils.
- 5.29 Warrington Borough Council suggests that provision of up to 2 new secondary schools as part of Option 2 (see Table 2.4) in the urban area 'may help alleviate some of this pressure'. However this is unlikely to have an impact on the number of places available at Culcheth High School as its pupils do not live within the urban area (see Pupil Heat Maps, Figure 5.2). Demand for Culcheth High School is therefore unlikely to be affected by changes to school capacity in the urban centre.
- 5.30 In order to mitigate against future capacity issues, an extension to Culcheth High School should be considered. Further, supporting a higher level of growth within one or more of the outlying settlements in the north of the Borough would enable a new secondary school or satellite campus to be developed and serving this area. The standard size of a secondary school outlined by DfE can range from 600 to 1,120 pupils aged 11 to 16⁴⁰. Smaller secondary schools also operate: 5% of secondary schools in England are below 600 pupils and there are three secondary schools in Warrington Borough operating at under 600 pupils as below:

Table 5.3: Secondary Schools Below 600 Pupils in Warrington Borough Council

School	School Type	Age range	Capacity	NOR
The Future Tech Studio	Free School	14-19	300	175
North Cestrian School	Free School	11-18	400	387
Wigan UTC	Free School	14-19	500	112

Source: School Census (January 2017)

Growth is not homogenous across Warrington

- 5.31 The Council has defined the 'incremental growth' scenario as up to 10% increase in settlement size⁴¹. The rationale is stated as follows:

*"The 10% limit in relation to settlement size is to ensure development is being capable of being accommodated without changing the character of the respective settlement under the 'incremental growth' scenario"*⁴²

³⁹ Warrington Borough Council (2017) Planning Obligations Supplementary Planning Document, Adopted January 2017

⁴⁰ DfE (2014) Baseline design, Available at: <https://www.gov.uk/government/publications/baseline-designs-600-place-secondary-school>

⁴¹ Warrington Borough Council (2017) Area Profiles and Options Assessment – Technical Note

Issue 6: Assuming uniform growth across outlying settlements does not reflect the heterogeneous nature of factors affecting different secondary schools

As shown in Issues 4 and 5, Lymm and Culcheth High Schools operate in different geographies and are influenced by different catchment factors. Lymm will be impacted by new provision within Warrington urban area, while Culcheth will not be. The scale of growth relevant to each area should be considered individually. This approach indicates that the area around Culcheth can accommodate much larger growth than the 'incremental growth' scenario to enable a new secondary school to be provided. More work is required to be undertaken by the Council with regards to the implications of new provision on Lymm.

- 5.33 Issues 4 and 5 demonstrate the specific catchment area factors of Lymm and Culcheth High Schools and in doing so demonstrate the variation in approach in considering the level of growth capable of being accommodated.
- 5.34 Our analysis demonstrates that a larger scale of growth in the northern outlying settlements would enable a new school to be provided and therefore would be the most sustainable approach for this location.
- 5.35 In the case of Lymm, Warrington Borough Council broadly points to the consequential effects of building new secondary schools within the urban area and that this '*may help to alleviate some of this pressure*'. However, the actual implications of this on school capacity at Lymm is not provided by the Council. This analysis could be undertaken so as to inform the level of growth possible in the Lymm area. It is likely that the new schools will reduce demand at Lymm High School, creating surplus capacity to accommodate further growth in the area. Notwithstanding this, there is likely to be scope to extend Lymm High School which would also allow Lymm to accommodate additional residential growth.

Summary of the comments

- 5.36 This section has provided comments on the Council's approach to assessing capacity at Culcheth High School and Lymm High School. 'Blindspots' in the analysis which underpins the selection of the PDO have been noted. The purpose is to draw attention to the complexities of school place planning and highlight that the Council's approach and conclusion drawn regarding secondary school capacity may be too simplistic for the following reasons:
- **Baseline assessment of supply and demand of places at Culcheth and Lymm High Schools (Issue 1 – 3).** There are both direct and indirect factors which affect spare capacity. These include; parental choice of schools; and population and/or school capacity changes in neighbouring local authorities and elsewhere in the borough. The Council could more fully assess these factors in considering school capacity and growth;

⁴² *ibid*

- **The approach to planning the future supply of places is not holistic** (*Issue 4 and 5*) – The Council’s approach is not future proofed; there is no flexibility if current patterns of demand or supply change. Culcheth is nearing capacity and incremental growth will simply perpetuate the problem. The Council’s assertion that new schools in the urban area will alleviate pressure elsewhere would have no material effect on Culcheth High School given cross border movements with neighbouring boroughs prevail. Providing for a greater level of growth will enable provision to be effectively planned, through either or both an extension to Culcheth High School and a new high school for Croft; and
- **There is no strong basis behind the level of growth identified within the incremental growth option** (*Issue 6*) – Demand for secondary schools throughout Warrington is growing at different rates. The assumption behind the 10% rate of growth is based on the capacity of existing infrastructure which appears arbitrary. Lymm and Culcheth High Schools are influenced by different catchment factors which should be taken into consideration in informing the scale of growth achievable. For example, Issues 6 demonstrate that a more sustainable approach in the may be for growth at a level which will warrant provision of a new secondary school and/or an extension to Culcheth High School.

Towards a more strategic approach

- 5.37 Children living in Hollins Green, Croft, Culcheth and Glazebury are likely to attend either Culcheth High School. Children living in Hollins Green and Lymm are likely to attend Lymm High School. Ensuring that there is sufficient capacity over the long term is critical.
- 5.38 The Local Plan review presents an opportunity for the planning and education team at Warrington Borough Council to think strategically about the distribution of houses, people and children across the Borough.
- 5.39 This report, building on Issues 4 and 5, suggests that an alternative, more strategic approach to housing distribution could be taken with regards to education by Warrington Borough Council:
- **The incremental growth option simply delays the need to address secondary school capacity issues at Lymm and Culcheth High School** – The assumption behind the incremental growth option is that development can largely be accommodated in existing infrastructure. However, given the currently capacity issues a larger scale consideration of secondary school capacity of Lymm High School and Culcheth High School is needed. As demonstrated in this chapter, each school has unique demand pressures which need to be considered. In particular, Lymm High School will be impacted by proposals with the urban centre. While Warrington Borough Council recognises this, it does not interrogate data to inform the conclusion with regards to the level of growth achievable;
 - **Demand from sustainable settlement extension could generate demand for a new school** – Higher housing growth in Culcheth, Croft or Glazebury could justify and potentially fund an additional smaller secondary school. Indeed the level of growth needed to support a primary school was used to define the

sustainable settlement extension growth option⁴³. A review should involve Salford and Wigan to understand changes in these areas as some of the pupils attending Culcheth live outside of the borough; and

- **The Local Plan Review presents an opportunity to think more strategically about school capacity** – Currently the evidence base is limited as infrastructure is considered by settlement and is reactive to housing growth scenarios. A quality school system is integral to the long term growth ambitions of Warrington. Undertaking a full and integrated review of school capacity across the whole borough will ensure that the Council base any growth decisions on robust information; and
- **School capacity should not be a limiting factor to housing growth** – Meeting housing need should be the first consideration. This can subsequently “unlock” key strategic education facilities. For example, through providing land or funding through S106. School infrastructure should not be considered as a barrier to growth but rather solutions and mitigation should be sought where demand cannot be accommodated.

5.40 As set out in Issue 6, the homogenous growth approach taken by Warrington Borough Council in the Preferred Development Option does not appropriately reflect the heterogeneous range of factors affecting different secondary school catchments. By considering growth on a settlement by settlement or school by school basis, the Local Plan would be able to plan much more sustainably for housing growth.

⁴³ The Council's analysis indicates that a larger scale of growth would also be accommodated within new primary provision.

6. Conclusions

- 6.1 The report forms part of Peel's consultation response to the Preferred Development Options as part of the Warrington Borough Council Local Plan Review.. The purpose of the report is specifically to review the evidence presented by the Council on the capacity of education facilities to the extent that this has informed the Local Plan and level of growth to be accommodated in the named outlying settlements.
- 6.2 Warrington Borough Council present the following with regards to primary and secondary education and growth:
- **Primary education** - The Council considers that growth under Options 2, 3 and 4 can be accommodated through school expansion. Primary provision is not identified by the Council as a limiting factor for the scale of growth which can be achieved.
 - **Secondary education** - The Council evidence indicates their position that secondary pupil demand under the incremental growth can be met but the level of growth under sustainable settlement expansion and above cannot be accommodated.
- 6.3 A number of comments with respect to the Council's method for assessing the implications of the different growth scenarios on secondary school capacity are made. The issues presented consider both demand and supply issues which may have been overlooked or not considered in depth. We identify the following issues:
- Issue 1: Proximity of nearby secondary schools does not appear to have been fully considered
 - Issue 2: Impact of pupils travelling from surrounding local authorities is not established
 - Issue 3: Relationship between central Warrington and Lymm is not fully explored
 - Issue 4: Future implications for Lymm High School need to be tested further
 - Issue 5: The incremental growth scenario only delays a strategic review of capacity at Culcheth High School
 - Issue 6: Assuming uniform growth across outlying settlements does not reflect trends in school growth
- 6.4 Warrington Borough Council applies a homogenous scale of growth to outlying settlements which experience heterogeneous influences on their school place requirements. Instead growth could be considered for each location as follows:
- With regards to growth within Lymm High School's catchment area, the Council could undertake further analysis to understand the impacts of the provision of 2

new secondary schools on capacity. Notwithstanding this, it is likely that an extension to Lymm High School could be achieved.;

- Additional growth within the catchment area of Culcheth High School would be appropriate given that this will enable a sustainable and planned approach to be taken to secondary school provision to meet need. Notwithstanding this, an extension to Culcheth High School could be achieved.

6.5 This report suggests a more robust approach which takes a more strategic outlook, and makes the following overarching recommendations:

Overarching recommendations and issues for the representations

- ✓ A strategic review of secondary school capacity is required for Warrington as a whole;
- ✓ Ensure approach to school planning is 'future proof' and considers direct and indirect pressures on school places;
- ✓ Provide a new and/or extend an existing secondary school to serve outlying settlements. Consider housing growth as a way to 'unlock' critical secondary education infrastructure; and
- ✓ Take the Local Plan review as an opportunity to think strategically about school place planning and how higher levels of development in the outlying settlements can support this spatial vision.

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Appendix 3: Comments on BNP Paribas Spatial Options Appraisal

Warrington Borough Council, Local Plan Review

Comments on BNP Paribas Real Estate -
Spatial Options Assessment ('SOA')

Representation prepared on behalf of:

Peel Holdings (Management) Limited

September 2017

Turley

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September 2017

1. Introduction

Purpose

- 1.1 This report is provided on behalf of Peel Holdings (Management) Limited ('Peel') and provides comments on the 'light touch' Spatial Options Assessment ('SOA') prepared by BNP Paribas Real Estate ('BNPPRE') on behalf of Warrington Borough Council as part of the development of the Warrington Local Plan.

Summary of Spatial Options Assessment

- 1.2 The SOA includes a first stage viability analysis for the development of Green Belt sites ranging from 500-6,000 units across the following 4 development typologies:

- Incremental Growth in Outlying Settlements: 500 units
- Urban Extensions: 1,400 units
- Large Urban Extension: 2,800 units
- Garden City Suburbs: 6,000 units

- 1.3 These growth typologies are the expected development forms necessary to deliver a large proportion of the 22,260 dwellings proposed through the Preferred Development Option (PDO) between 2017-2037. Peel are in agreement with the principle of the release of Green Belt land as identified in the PDO document and recognise this as an important mechanism for delivering housing need within WBC.

- 1.4 The SOA sets out in generalised, high level terms, to determine the extent to which the infrastructure requirements required to facilitate the delivery of the Local Plan can be supported across each development typology without compromising site viability. The SOA presents each development typology, outlines headline assumptions adopted within each assessment, and presents the appraisal results. The SOA undertakes a 'sensitivity analysis' which attempts to incorporate sales value growth over time. The SOA includes appraisal summaries within its appendix, albeit without supporting and accompanying cashflows at this stage.

- 1.5 BNPPRE assess site viability by comparing the Residual Land Value (RLV) generated by the appraisals with a value stated as the "min land value for landowner". If the RLV exceeds this "min land value", the surplus value is proposed to represent the amount which is available for infrastructure. The SOA concludes that WBC could secure between £21,496 and £31,521 per unit towards the provision of on-site community infrastructure and major off-site infrastructure. The results of the sensitivity analysis conclude that between £39,296 and £63,181 per unit could be secured after accounting for expected value growth.

- 1.6 It is our understanding that the SOA is a 'light touch' precursor to a proposed, more detailed viability and infrastructure delivery assessment exercise, to be undertaken on a site-specific basis by BNPPRE on behalf of the Council. This will assess the final

development sites and locations to be allocated in the forthcoming Draft Local Plan. Presumably, however, the SOA will be utilised by WBC in informing its approach to spatial options within the Draft Local Plan, and will therefore carry some weight in this process by establishing headline principles and expectations.

- 1.7 However, Peel has identified a number of potential issues within the SOA viability assessment and supporting evidence base, which leads to a conclusion that the proposed available amount for infrastructure provision may unviably burden future development, which is necessary for Local Plan deliverability.

2. Matters of Representation

- 2.1 This chapter elaborates on specific technical issues within the PDO viability evidence to be utilised by WBC in the formation of the Local Plan Review to influence site selection and infrastructure requirements.
- 2.2 National policy underlines the requirement for Local Authorities to test their plan at various stages in order to ensure delivery.
- 2.3 Paragraph 173 of the NPPF¹ states the following:

“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”

- 2.4 Paragraph 174 of the NPPF states the following:

“Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence.”

- 2.5 The following representations identify some concerns regarding the viability testing for the PDO which risks compromising the deliverability of a future Local Plan. Unless otherwise stated, the focus of analysis is upon the ‘Warrington Borough Council Spatial Options Assessment’ prepared by BNPPRE on behalf of WBC, which supports and informs the PDO. Comments are set out under relevant sub-headings.

Development Typologies

- 2.6 Testing should be applied to development typologies likely to be brought forward in delivering the Local Plan. PPG states that:

“The sampling should reflect a selection of the different types of sites included in the relevant Plan, and should be consistent with viability assessment undertaken as part of plan-making.”

¹ DCLG (2012) National Planning Policy Framework (NPPF)

- 2.7 The SOA tests viability across hypothetical schemes of 500, 1,400, 2,800 and 6,000 units. The PDO report, published by WBC, states that despite maximising the capacity of the existing urban area, development need can only be met by the release of Greenbelt land for the provision of 8,791 units².
- 2.8 The PDO states that 1,000 units will be delivered across incremental growth sites within outlying settlements. The remaining approximate 8,000 units to be delivered on the Green Belt as a 6,000 unit Garden City Suburb and a 2,000 unit urban extension.
- 2.9 The SOA uses a 500 unit site as the typology to test the 1,000 unit incremental growth scenario, leading to an assumption that only two sites will provide incremental residential growth in outlying settlements. However, 92 Green Belt sites were submitted during the Call for Sites, as outlined within the PDO Consultation Report.
- 2.10 No recommendations are made within the PDO as to the composition of sites contributing to the 1,000 unit provision and it is perhaps unlikely that such growth will be delivered by only two sites. A more fine grained analysis should be undertaken to correctly represent potential incremental growth, say with 2-3 sites for larger settlements and 1 site for smaller settlements. Therefore, the residential typologies appraised within the SOA do not at this stage appropriately represent the scale and number of sites within the PDO and envisaged as critical to meeting the objectively assessed needs of WBC.
- 2.11 Within the SOA, BNPPRE details that the 6,000 Garden City Suburb Typology also includes a variety of non-residential uses expected on site. There is no indication of the scale of these. The SOA does not account for these uses within its viability assessment in terms of revenues and build costs and hence their impact on RLV. The specific realities of delivering this development typology are therefore not appropriately allowed for within testing and a revised methodology should incorporate the proposed non-residential uses as essential.

Unit Sizes (by tenure)

- 2.12 The SOA does not specifically state the unit sizes, bed numbers or unit types adopted within the assessment for any of the assumed tenures.
- 2.13 The appended appraisals provide a total developed area (m²) across private units, affordable rented units and intermediate. As the appraisals also detail unit numbers across each tenure, the average unit size could be extrapolated as follows:
- Market Housing: 95m² (1,023ft²)
 - Affordable Rent: 85m² (915ft²)
 - Intermediate Housing: 70m² (753ft²)
- 2.14 In order to tie the figures adopted by BNPPRE to WBC's Local Plan evidence base, consideration has been given to the Mid Mersey Strategic Housing Market Assessment (2016) (SHMA). The SHMA forms part of the supporting evidence base within the PDO

² WBC 'Preferred Development Option- Consultation' (2017)

Consultation, outlines the market and affordable housing requirement by number of bedrooms (%) from 2017-2037 within Warrington. This is indicated within table 2.1 below.

Table 2.1: Warrington’s Market and Affordable Housing Requirement by Number of Bedrooms

No. of Bedroom	Market Housing %	Affordable Housing %
1	6.5%	48.7%
2	32.1%	25.7%
3	49.9%	23%
4+	12.2%	2.7%

Source: Mid Mersey Strategic Housing Market Assessment (2016)

- 2.15 With regard to the affordable unit requirements, an average unit size of 85m² across the affordable rented typology, as adopted within the SOA, is considered high in comparison to the requirements outlined within the SHMA. The SHMA mix, which includes 74.4% 1 and 2 bed units, would produce a significantly smaller average unit size. BNPPRE provides no reasoning to justify the assumed unit sizes.
- 2.16 The SOA adopts an average unit size of 75m² across intermediate housing with no justification for the size difference between the affordable tenures. We would expect intermediate tenure houses to offer the same, or larger average unit sizing than affordable rented.
- 2.17 The potential lack of clarity regarding the assumptions adopted in respect of affordable housing within the viability assessment could cast doubt upon the validity of the SOA, with limited indication that the SHMA has been referenced. This is a concern given its relevance to the delivery of the Local Plan.

Unit Types

- 2.18 There is no justification provided for the total developed area adopted within each appraisal or any indication of the bedroom numbers, unit size, or unit type mix which combine to form each adopted average floor area. The extent to which the assessed typologies are in direct response to local housing need is unclear and ambiguous and it is requested that further information and methodology be provided to evidence and justify the proposed assumptions.

Garages

- 2.19 It is unclear whether any consideration has been given to the reasonable provision of garages within any of the assessed scenarios. Based on Peel and Turley’s experience of working with national house builders across the region, it is anticipated that all 3+ bedroom open market detached dwellings would provide at least a single garage, with 4 bedroom and 5 bedroom dwellings providing double garages (or triple garages in limited cases). Considering the SHMA requirements and the average market housing unit size,

it is clear that the unit mix would lean considerably towards provision of units with garages.

- 2.20 Whilst garages will not attract a full £/m² house build cost, the costs of garage construction are substantial – ranging from circa £250/m² for integral garage construction through to £450/m²-£500/m² for detached garages (dependent on whether single, double or triple). Failure to accommodate and clearly set out these costs represents a potential shortcoming of the SOA.
- 2.21 Confirmation is requested as to whether any allowance has been made for the provision of garages within the viability assessment. If not accounted for, this represents a potential weakness within the viability evidence base which could, as a result substantially underestimate construction costs and overstate the propensity of sites to accommodate infrastructure costs.

Development Programme

- 2.22 BNPPRE detail the build period across each typology ranging from 5-20 years. The build rate across each typology is derived as follows:
- Incremental Growth: 100 units per annum
 - Urban Extension: 140 units per annum
 - Large Urban Extension: 187 units per annum
 - Garden City Suburb: 300 units per annum
- 2.23 The SOA gives no details on the basis on which each typology is being developed, however subsequent referencing to phasing for each typology suggests that BNPPRE has assumed that each site is being delivered as a multi-developer outlet.
- 2.24 BNPPRE do not specify an adopted sales rate or detailed development programme assumptions such as pre-construction period. Without this clarity it is not possible to assess the SOA as robust at this stage. It is requested that BNPPRE provide specific details regarding build and sales period assumptions.
- 2.25 The summary appraisals suggest that a phased approach to delivery has been modelled, albeit this is not explained within the SOA. Given that any such phasing will have a critical impact on the results, confirmation is requested of the approach adopted, including details of the number of assumed sales outlets and delivery profile.

Development Costs

Construction Costs

- 2.26 The SOA adopts a base construction cost for house build of £1,050/m². BNPPRE do not state the basis upon which this assumption was formed, or provide evidence in its support. Further clarity should be provided on how these construction costs have been derived.

Professional Fees & Contingency

- 2.27 The SOA adopts professional fees at a level of 9% of base build. A rate of 9% of base costs to cover professional fees is at the lower end of industry expectations on medium and larger development sites, where the Harman Guidance³ advocates a range of 8 – 20%. Peel would expect to see professional fees at circa 10% (including planning, surveying, NHBC etc.) on sites of less than 100 units, but would fully anticipate professional fees to increase to 15-20% on sites larger than 300 units, and strategic sites, particularly those requiring long term promotion through the planning system and extensive survey and assessment work as is likely to be the case with most sites in Warrington. This is itself clearly recognised as a realistic, necessary and appropriate order of cost within the Harman Guidance. BNPPRE should re-run the viability assessment incorporating increased professional fees allowances to reflect the fee ranges set out above.
- 2.28 Critically, professional fees will also be incurred on the design and delivery of external works (e.g. highways; sewerage; services, infrastructure etc.). The application of professional fees should cover both base construction costs and external works within the viability appraisals. BNPPRE has not done this within the SOA, and no professional fees are assumed to be necessary to deliver external works. A separate 5% contingency rate has been applied to the base construction costs within the SOA. This rate is regarded as appropriate. Within the appended appraisals BNPPRE applies contingency to the infrastructure and external works only, however a contingency allowance should also be applied to the professional fees to appropriately reflect the complexities within the design and promotion of such sites, and the risk of escalation.

Finance Rate

- 2.29 The SOA states that a finance rate is applied at a 6% debit rate. A finance rate of 7% is more representative of the current lending market.
- 2.30 Review of the appended cashflow for each typology details that BNPPRE have also applied a 1% credit rate within each appraisal. This is not recognised as an industry standard assumption and there is no evidence or justification for inclusion within each appraisal the inclusion of any credit rate. The adoption of a credit rate is misrepresentative of the reality of finance costs generated on large scale developments, particularly given the high level nature of the SOA assessment.

Abnormal Costs

- 2.31 There is no specific allowance for abnormal costs incurred across any of the typologies. Such costs should reasonably be anticipated upon the development of greenfield sites. It is accepted that these costs are site specific. Abnormal costs will vary and it is acknowledged that it is difficult to capture within a generalised viability assessment.
- 2.32 The minimum land values adopted within the SOA are put forward by BNPPRE to represent the absolute minimum required for a land owner to release their site for development inclusive and accounting for ALL costs⁴. Hence, there is no scope for any further reduction in this 'minimum land value' as a result of abnormal costs which must

³ Viability Testing Local Plans - Advice for planning practitioners June 2012

⁴ Peel provides further comment on the appropriateness of the 'minimum land value' under a dedicated sub-heading later in this representation.

be anticipated to be generated on any site, whether it be greenfield or previously developed.

- 2.33 The complete exclusion of an abnormal cost allowance within the assessment as a major oversight. The reality is that abnormal costs can often reduce the RLV below the threshold land value which would incentivise a land owner to release land for development. Failure to incorporate an appropriate abnormal cost allowance puts the deliverability of sites at risk, and undermines the results within the SOA. On the basis of their knowledge of green field housing delivery, Peel recommend the adoption of an average abnormal cost appraisal assumption equating to £200,000 per hectare.

Open Market Sales & Land Values

Open Market Sales Values

- 2.34 The SOA states the adoption of an average sales value of £2,650/m², based on new build achieved sales units within a 12 month period, and this value is adopted within the appraisals to calculate overall gross development value (GDV) for each of the four typology appraisals.
- 2.35 The evidence base which supports these adopted average sales values has not been published by BNPPRE within or accompanying the SOA. The appropriateness of the sample size and the variety of units cannot be assessed and therefore the appropriateness of the adopted methodology and resultant value cannot be determined.
- 2.36 Relevant RICS guidance advocates that development sales values should be supported by local comparable evidence. Guidance within the Harman Report also confirms:
- “...when considering information on sales values and rates care should be taken to reflect current market conditions having regard to net sales revenues rather than asking prices.”*
- 2.37 BNPPRE provides no information on the methodology employed in the collation of the supporting evidence base and the basis (net/gross) of the comparable values.
- 2.38 Given that SOA is centred around the release of sites across the Borough in different market areas, the adoption of a single value sales rate to appropriately capture the variety of possible sites and their associated value difference is regarded as inappropriate.
- 2.39 The full market pricing evidence base that has underpinned the SOA should be published for consultation and stakeholder comment/review. As stated within the Harman Report, sales values within viability testing should be informed by net achieved sales and represent local market actualities. Without the provision of the evidence base the robustness of the adopted GDV cannot be determined.
- 2.40 BNPPRE have undertaken additional scenario testing to account for the potential 'real growth' in sales values over time. They have adopted a 2% value increase per annum (net of build cost inflation). The adopted inflation rate is not substantiated at this stage. It is unclear at this stage why sales value growth is assumed above build cost inflation by 2%, or even if any build cost inflation has been considered.

- 2.41 The SOA does not include appraisal summaries associated with this scenario testing, so it is not possible to determine the key modelling assumptions. These should be published along with cash flows.

Minimum Land Values

- 2.42 BNPPRE states that it adopts a minimum land value of “*no more than 10 times agricultural land value*” which is considered to reflect “*a competitive return in comparison to existing use*”. The SOA does not directly state or evidence the adopted agricultural land value; however working back from the stated landowner’s return, using gross site areas and the stated minimum land value, an agricultural value of £21,000 per gross hectare appears to have been adopted.
- 2.43 The adopted minimum land values equate to £210,000 per gross hectare (84,986 per gross acre) are the lowest proposed level of strategic land value that Turley and Peel have seen across a large number of Local Authority assessments, including many areas with weaker housing markets. There is no evidence or basis to suggest that the market would operate differently in Warrington in a way that suppresses land values.
- 2.44 BNPPRE’s land value assumption is hence at risk of understating the competitive return to a willing landowner in line with the NPPF. This will lead to a misrepresentation of the revenue available for infrastructure provision. The subsequent allocation of sites based on erroneous assumptions within the SOA could harm the deliverability of sites and the Local Plan.
- 2.45 The minimum values should be reconsidered and adjusted upward to a more realistic level that reflects guidance on viability assessment, research and practice on land values and the likely operation of the market in Warrington.

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Peel Holdings (Management) Ltd

Summary of representations to the Warrington Local Plan Preferred Development Option consultation (September 2017)

This paper provides a summary of Peel Holdings (Management) Ltd's ("Peel") comments on the Warrington Local Plan Preferred Development Option Regulation 18 Consultation ("PDO consultation"). Peel's full representations are contained within the following documents submitted to Warrington Borough Council:

- Representations to Warrington Local Plan Preferred Development Option Regulation 18 consultation (September 2017);
- Completed standard response form;
- A series of Development Prospectuses relating to the following proposed development sites:
 - Land north east of Culcheth;
 - Land at Rushgreen Road, Lymm;
 - Land north west of Croft;
 - Land at Lady Lane, Croft;
 - Land at Hollins Green
- A Technical Appendix to each of the above Prospectuses

Peel's comments on the PDO are provided in the context of its significant and diverse land and development interests in Warrington, including:

- Sites within the Warrington Waterfront proposed development area (including Port Warrington and expansion land and land at Arpley Meadows);
- Land within the Warrington South West Extension proposed development area;
- Major greenfield and Green Belt sites with significant residential development potential across the wider Borough;
- Various smaller sites within the urban area and outside of the urban area with mixed use development potential;

Peel submitted extensive comments to Warrington Borough Council on the Regulation 18 Consultation Scope and Contents Document in December 2016. These further representations build on these comments in the context of a more clearly expressed spatial strategy for the future growth of the Borough as provided by the PDO document.

Preferred Option – general comments

Peel welcomes the progression of the Warrington Local Plan. The realisation of the Warrington New City aspiration sits at the heart of this and underpins the spatial strategy and growth ambitions set out. Warrington New City is about the town realising its full potential; its transformation from a New Town into a New City at the heart of the Northern Powerhouse, capitalising on its strategic position between Manchester and Liverpool and at the intersection of four major economic growth and development corridors of national importance:

- The M62 Corridor;
- The M56 / A55 Corridor;
- The Manchester Ship Canal Corridor; and
- The M6 / HS2 Corridor.

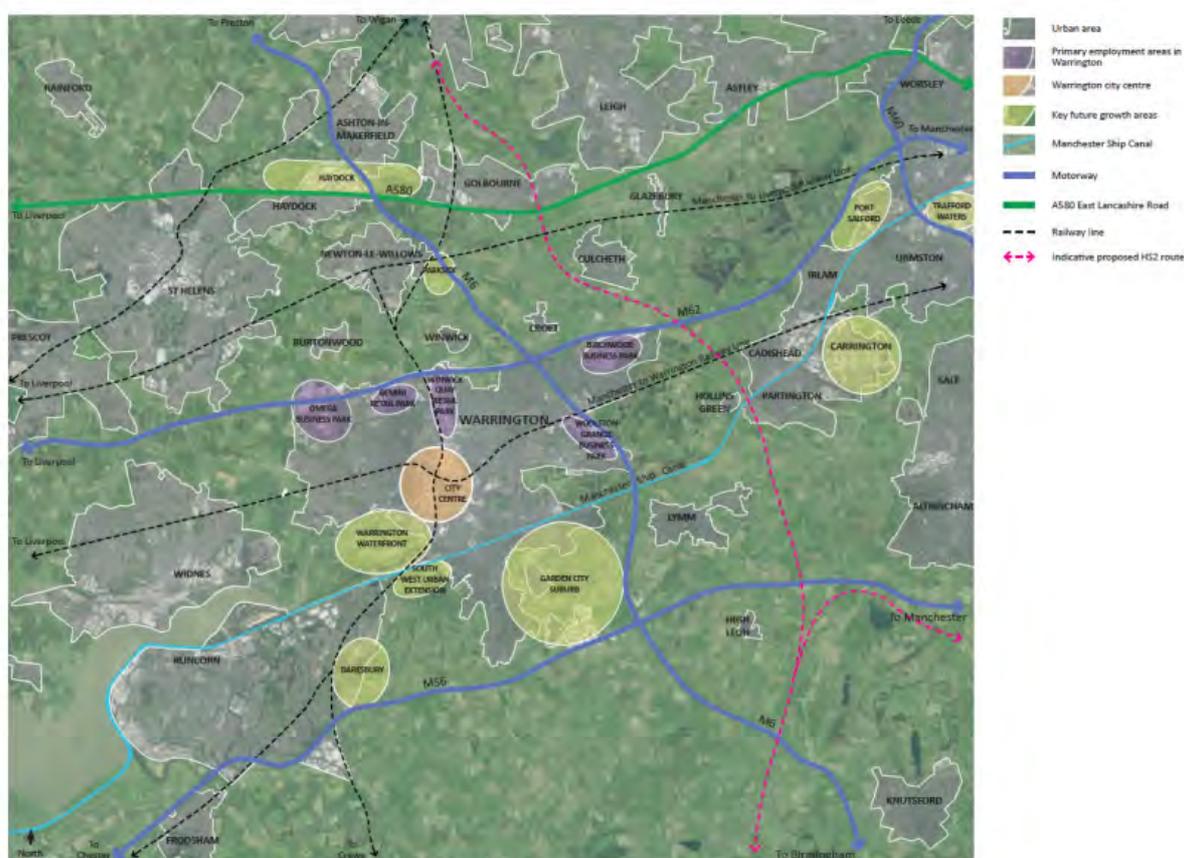


Figure 1: Warrington Strategic Context

New City seeks a sustainable future for Warrington with a focus on new and improved infrastructure; delivering the homes which Warrington needs; increasing and diversifying employment and making Warrington more resilient in the face of future economic and environmental challenges. It encapsulates economic, social and environmental dimensions. ‘Quality of place’ runs through this vision.¹

¹ Warrington Means Business – Warrington’s Economic Growth and Regeneration Programme (Warrington & Co 2017)

The Council has undertaken an appraisal of all options for realising the New City aspiration. It has identified a series of key development sites which will unlock Warrington's potential being drivers of growth in their own right whilst having the ability to address existing and longstanding infrastructure constraints which are holding Warrington back. These sites are strategically located and build on existing infrastructure assets (such as the Manchester Ship Canal) and future planned infrastructure (such as the Western Link) which are key to Warrington's future growth. Peel recognises the significant benefits that will be realised through the focus on the five main development areas: Warrington Town Centre; the wider urban area; Warrington Waterfront; Warrington Garden City Suburb and the South West Warrington Urban Extension in delivering New City.

Peel has a number of major land interests within these locations and is committed to bringing these forward through the Local Plan. Peel is fully supportive of the Council's proposals for these locations as set out in the PDO. Peel recognises that significant infrastructure investment is needed to realise these development opportunities and is fully supportive of the emerging proposals for the delivery of the Western Link Road connecting the A56 and the A57. As a significant land owner in this area, Peel is committed to working with the Council to deliver this critical infrastructure.

Peel welcomes the Council's recognition of the development potential of Port Warrington to deliver an increase in the Borough and region's multi-modal freight and logistics capacity and to secure significant employment and economic benefits. This allocation reflects that the Local Plan is seeking to respond to strategic opportunities which the Borough presents, as encouraged by NPPF and the National Policy Statement for Ports (January 2012).

The expansion of Port Warrington is a key part of the Mersey Ports Masterplan developed by Peel Ports and forms one of a number of strategic port investments to promote the more sustainable transport of goods across the region and which capitalise on the demand for increased logistics and freight infrastructure in the context of growth and expansion of the Port of Liverpool.

More generally, the proposed allocations outlined in the PDO document provide a mix of residential, commercial and employment development proposals. They respond to the inherent opportunities presented by these sites to drive the growth of the Borough in the context of their strategic location. The proposed extensions to the urban area will collectively provide a critical mass of development in a single broad spatial area to secure the infrastructure needed to unlock the town centre and waterfront and facilitate their development and regeneration. The scale of opportunities here can deliver genuine change and will provide the opportunity to create liveable places which embrace and contribute to the Garden City concept as a key principle of New City.

Peel supports the Council's proposal to deliver a level of housing above the Objectively Assessed Need and considers this to be critical to the realisation of New City as a policy stimulant to the growth of the Borough. Peel agrees that this presents Exceptional Circumstances to justify the release of land from the Green Belt in the context of the Borough's urban land supply. It is noted that the Council has sought to maximise development within the urban area in order to arrive at a residual housing requirement to be met from the release of Green Belt land. This too is supported by Peel.

Meeting the Borough's full development needs

Whilst supportive of the overall strategy and aspiration of the plan as emerging, Peel considers that there are opportunities to further improve the sustainability and robustness of plan and to ensure it meets the wider spatial needs of the Borough. These are important considerations in ensuring the plan is able to be found sound at Examination.

These enhancements to the plan can be achieved in a manner that does not take away from New City or the planned growth in and around Warrington which is so critical to this. The following key observations are made in this regard:

Securing a sustainable future for the outlying settlements of the Borough

The Outlying Settlements of Warrington face significant challenges and threats to their long term sustainability. This is demonstrated by reference to key indicators, including affordability of housing, changing demographics and the current health and viability of their services and Local and Neighbourhood Centres.

Collectively these settlements are proposed to grow by only 10% over a 20 year plan period. Peel is concerned that this restricted level of growth will have lasting adverse effects on the sustainability of these settlements as places to live and does not reflect the level of market and affordable housing they require. Supporting the sustainable growth of these settlements can address these issues, whilst providing the opportunity to deliver new infrastructure needed to secure a sustainable future for these areas and address existing infrastructure deficiencies (such as in secondary schools).

It is noted that the PDO's Spatial Objectives do not capture the need to secure the future sustainability of these settlements and, as a result, this matter does not appear to have been given any consideration in the Council's appraisal of Spatial Options.

The role of the Outlying Settlements in delivering New City

Whilst the realisation of New City requires a critical mass of development to be directed to the main settlement of Warrington, as proposed through the PDO, Peel considers that some growth in the outlying settlements is a necessary part of, and can make a positive contribution to, the New City vision. This will ensure that the core urban area is supported by sustainable and viable settlements providing a different but complementary housing offer and environment to the town of Warrington to attract and retain economically active households.

It is noted that the Council's appraisal of the Spatial Options is undertaken on the basis that only growth in and on the edge of Warrington can make a positive contribution to New City. To the extent that development is directed to other parts of the Borough, the Council's appraisal assumes that this will, at best, have a neutral outcome in terms of contribution to New City. Peel would encourage the Council to reconsider this conclusion since the Outlying Settlements also need investment in new homes to ensure the right amount, type and quality of homes in the Borough overall.

Balanced growth and avoiding a north-south divide in Warrington

There is an opportunity to achieve a more sustainable relationship between housing and employment through further consideration of the Borough's economic geography. In particular, the limited amount of development proposed in the north of the Borough means that the plan has a strong southern emphasis. The north of the Borough also requires new housing investment and is well placed to achieve it in a sustainable way. Further growth in the north would better reflect the reality of a more dispersed economic footprint and the influence of areas outside of Warrington itself in determining the most sustainable location for future residential growth.

It is noted that some of the Borough's key economic drivers, which have a significant bearing on travel patterns, are located in the north of Warrington (e.g. Omega, Birchwood Park and strategic road connections within Liverpool, Manchester and major employment locations such as Trafford Park and the M6/A580 Corridors in St Helens and Knowsley). An increased focus on residential development in the north of the Borough would realise significant sustainability benefits in this regard through a more

effective co-location of housing, employment and strategic transport connections, reducing travel and congestion on the local and strategic road network in and around Warrington.

Growing beyond Objectively Assessed Need

Whilst fully supportive of the proposal to deliver a level of housing growth which exceeds the Objectively Assessed Need, Peel considers that the housing requirement should be increased further. The level of uplift proposed to the Objectively Assessed Need of 955 dwellings per annum is c16.5%. Peel would question whether this scale of growth is commensurate with the New City aspiration, which provides a very ambitious vision for the future of the Borough. New City goes beyond building on Warrington's success as a place and, by definition, seeks transformational change, exceeding what has gone before.

It is noted that through the Sustainability Appraisal, the Council has considered an annual requirement figure of 1,332 dwelling per annum ('Higher Growth Level' within the Sustainability Appraisal). Given the scale of the New City aspiration, there would be merit in the Council giving further consideration to whether a figure closer to the 'Higher Growth Level' requirement more closely reflects the ambition of New City.

Notwithstanding this, there is a need to ensure a robust and reliable supply of housing land is identified which will deliver the aspiration and objectives of the plan. To secure this, Peel considers that greater provision should be made for a flexibility allowance within the planned supply – that being 20% rather than 5% as proposed. This will ensure that the delivery of the plan is not undermined in the event of one or more key sites not coming forward at the rate currently anticipated. Even based on an annual requirement of 1,113 residential units per annum as proposed through the PDO, this would require the allocation of land capable of accommodating 27,728 units over the plan period, approximately 3,500 more than currently proposed.

Safeguarded land

In order to ensure the Green Belt can endure over the long term and will not need to be reviewed through the new Local Plan, the amount of land allocated as safeguarded for future residential development beyond the plan period should be increased from 137 ha to 339 ha. This is based on planning for development needs for 20 years rather than 10 years after the plan period and applying a more realistic assumption around the likely requirement for these needs to be met through the release of land from the Green Belt.

Employment land requirements

The PDO does not make sufficient provision for meeting local employment development needs. Whilst the plan supports a number of strategic employment development opportunities, such as the expansion of Port Warrington, which are supported by Peel, these will capture demand which exists across the wider north west area in the context of a number of critical drivers of growth in the logistics sector. They will partly respond to opportunities which Warrington presents to increase its share of the northwest logistics market building on its strategic transport connections.

There is a need to plan for additional employment land to meet Warrington's localised needs however which may not be met by these strategic opportunities.

Outlying Settlements – sustainable infrastructure provision

At this stage Peel would question some of the conclusions drawn by the Council regarding the infrastructure capacity constraints within the Outlying Settlements. These have informed the Council's appraisal of various growth scenarios for these settlements.

It is considered that a more holistic review of secondary school capacity should be undertaken to inform this analysis, including a consideration of the catchment area of these schools and the extent to which they are drawing pupils from outside of the Borough. Peel also considers that there may be scope to secure an increase in school capacity through extensions to a number of existing schools, including both Culcheth High School and Lymm High School, contrary to the Council's conclusions. Further to this Peel would encourage the Council to also consider infrastructure capacity and constraints in the context of proposals put forward for developers and land owners to mitigate such constraints as part of the sites being promoted for allocation. Such proposals might serve to provide additional capacity to enable the settlements to grow by more than the 10% assumed by the Council, whilst also providing new infrastructure to address existing issues which these settlements face.

In addition, within a number of settlements, local service provision is struggling as the economy and trends change, with settlements unable to sustain basic health, community, education and retail facilities. Consideration should be given to the opportunities that would be presented by increased levels of housing in those settlements to support local facilities.

It is also important to note that the various constraints affecting the Outlying Settlements will not be the same in each and some will have a greater capacity to grow than others. In this regard, it is important that the Council undertakes bespoke assessments of each settlement and the opportunities and constraints which each presents with respect to its future growth. A universal cap of 10% as proposed may not represent the most sustainable approach. The Outlying Settlements clearly do not have to accommodate the same proportionate level of development; however, the level of housing provided for should recognise a baseline minimum level reflecting their current comparative size and role. The Local Plan should then progress to determine a bespoke figure for each based on an appreciation of that settlement's constraints and opportunities for sustainable growth.

Revised Green Belt appraisal

Peel welcomes the revisions made within the Green Belt Assessment in respect of the Green Belt contribution made by defined parcels in Lymm and Hollins Green which have been downgraded from 'strong' to 'moderate.'

Peel would question the justification for treating the planned HS2 route as a readily recognisable physical feature² in appraising the contribution made by parcels of land through which this route will pass. At this stage, the route is legally protected from development however it does not exist as a physical feature and should not be treated as such for the purposes of a Green Belt appraisal.

Progressing the Local Plan

Peel's representations highlight a number of areas where the plan could be enhanced to ensure it presents a sustainable spatial strategy which fully responds to the challenges and opportunities which Warrington faces and which will ensure the plan's objectives are achieved. This is important to progressing a sound plan. These enhancements are suggested in the context of New City continuing to be the principal driver of the plan and a recognition that the plan will need to deliver the level of growth already proposed by the Council in and on the edge of Warrington in order to achieve this. They include:

² As required in accordance with paragraph 85 of the NPPF

- Increased levels of housing in the north of the Borough to ensure a more balanced sustainable strategy overall and to avoid an over-reliance on the south of the Borough;
- Increased levels of housing in the Outlying Settlements to provide the right amount, quality and choice of housing in those local areas and to help support and sustain local facilities and infrastructure;
- A potential increase in the proposed housing requirement (closer to the 'Higher Growth Level' considered in the Sustainability Appraisal);
- Notwithstanding the above, in the context of a continuation of planning for 1,113 residential units per annum, the allocation of housing land to deliver at least 27,728 units (an uplift of approximately 3,500 units over the plan period);
- An increase in the amount of land to be designated as 'safeguarded' for future residential development from 137 ha to 339 ha.

Proposed development sites

An additional and more diversified supply of land would be required to accommodate the above requirements. In responding to the wider issues raised by Peel, this should be provided through the targeted release of Green Belt sites on the edge of Outlying Settlements. These will need to be selected based on a range of considerations, including Green Belt context, landscape sensitivity, the sustainability of the location in strategic terms (including proximity to key employment areas and strategic road connections) and the absence of infrastructure constraints or the ability of proposals to mitigate such constraints.

In this regard, Peel has suggested five proposed residential allocations on the edge of the Outlying Settlements of Lymm, Culcheth, Hollins Green and Croft. These are shown on the plan below.

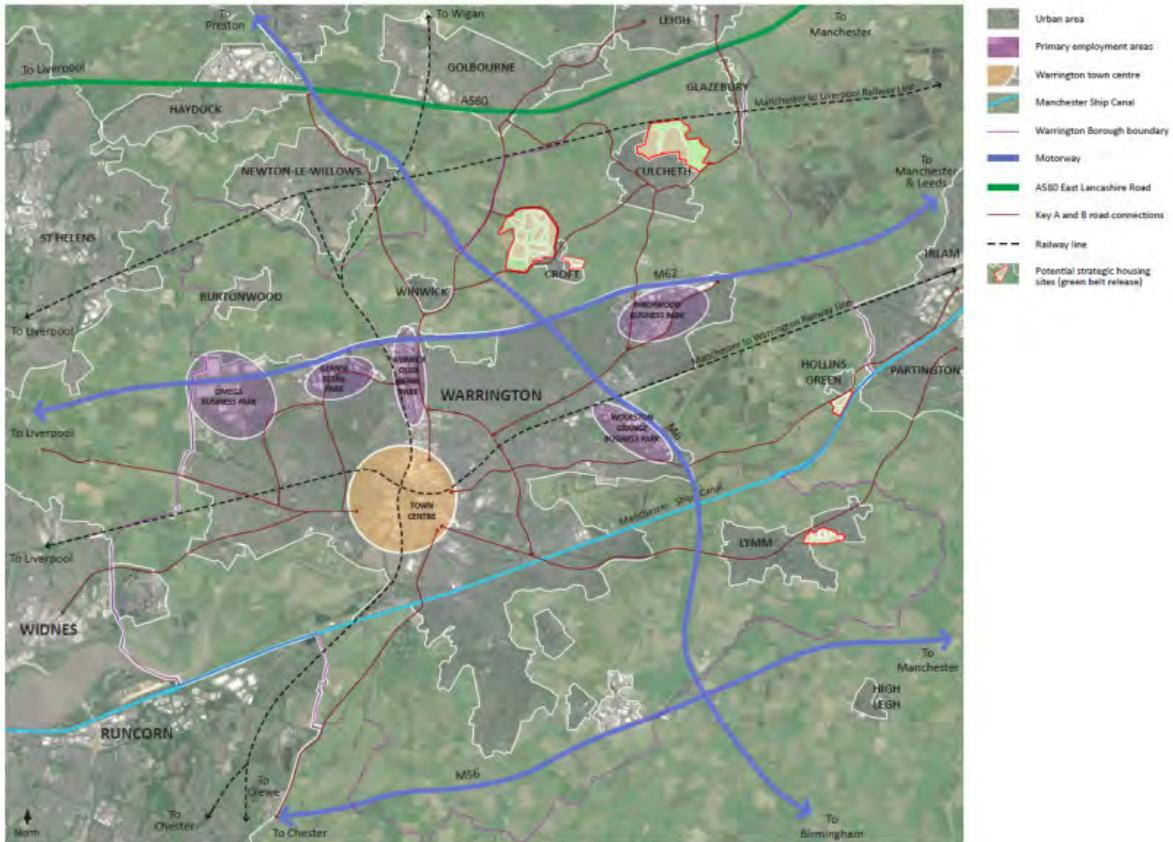


Figure 2: Proposed sustainable settlement extensions

These proposals are supported by Site Prospectuses and a body of technical evidence which demonstrates their sustainability as development locations and the absence technical constraints which would preclude their delivery over the plan period. A sustainable vision and masterplan is presented for each site, which demonstrates how the proposed scheme responds to its physical context and, in each case, the site's ability to deliver the social and community infrastructure to support the development and which can provide a solution to existing infrastructure capacity issues facing the Borough and its settlements.

These sites can be allocated through the Local Plan as part of a balanced spatial strategy which achieves the ambitions of Warrington New City, including maintaining a focus on Warrington whilst ensuring the Plan responds positively to the wider spatial needs and sustainability challenges which Warrington faces.