

EiP Statement

Warrington Updated Proposed Submission Version Local Plan 2021-2038 (dated September 2021)

Story Homes

Representor ID UPSVLP 1418

Our ref 42154/07/RCA/TE

Date July 2022

Subject Matter 3: The Spatial Strategy

1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Lichfields on behalf of Story Homes [Story] (Respondent No: 1418) in relation to Matter 3 (The Spatial Strategy). This Statement has been written in respect of Story's land assets in Warrington and focuses on the site at Warrington Road, Culcheth, allocated in the Warrington Updated Proposed Submission Version Local Plan 2021-2038 (September 2021) [WUPSVLP] (Policy OS2 – Culcheth).
- 1.2 This Statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 3 Examination in Public [EiP] hearing sessions on the Spatial Strategy.
- 1.3 Story has previously submitted representations in relation to WUPSVLP Regulation 19 public consultation stages of the Plan in support of the site and concerning the overall strategy and other proposed policies.
- 1.4 Story is also represented by Lichfields as part of a Consortium of housebuilders, namely Ashall Property, Barratt Developments (Barratt Homes and David Wilson Homes), Metacre Ltd and Satnam Developments.
- 1.5 Separate statements have been submitted in respect of the following Matters:
- 1 Matter 7b – Site Allocation – Culcheth
 - 2 Matter 11 – Transport and other Infrastructure
 - 3 Matter 13 – Other Policies
 - 4 Matter 14 – Monitoring and Review

- 1.6 This Statement expands upon Story's previous representations¹ made on the WUPSVLP and focuses on the Inspector's specific issues and questions. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework [the NPPF] and the National Planning Practice Guidance [Practice Guidance].
- 1.7 Alongside the land at Warrington Road, Culcheth, Story is also promoting additional land at Runcorn Road, Higher Walton (the SWUE) which is capable of coming forward to meet the requirement for new homes in the Borough.

2.0 Questions: Overall Spatial Strategy

Housing

Question 6. In terms of high-level options for Green Belt release, what is the basis for the chosen approach i.e. the majority of Green Belt release adjacent to the main urban area with incremental growth in outlying settlements? Why was this chosen ahead of other options? Is this justified?

- 2.1 The WUPSVLP [§3.4.1 to §3.4.16] sets out the exceptional circumstances sought by the Framework [§140] to justify the release of Green Belt land which includes exceptional circumstances for each area, including the outlying settlements.
- 2.2 The Council has examined all other reasonable options for meeting its identified housing need for development and concluded that there is not enough brownfield land or land in neighbouring authorities (through its Duty to Co-operate) to meet its needs. Green Belt release in order to promote sustainable patterns of development is therefore the only option available to the Council.
- 2.3 The Council proposed three options for the distribution of housing for Green Belt release². This included:
- 1 All Green Belt Release accommodated adjacent to main urban area
 - 2 Majority of Green Belt Release accommodated adjacent to main urban area with 'incremental growth' in outlying settlements
 - 3 Green Belt release adjacent to main urban area complemented by a sustainable extension to one or more outlying settlements and incremental growth to remaining settlements
- 2.4 The Council considered that option 2 preformed the best against the plan's objectives, concluding that³:

¹ Warrington Updated Proposed Submission Version Local Plan: Representations on behalf of Story

² Development Options and Site Assessment Technical Report (September 2021)

³ Development Options and Site Assessment Technical Report (September 2021)

“Focusing the majority of Green Belt release adjacent to the main urban area is considered to provide the best development option to ensure the sustainability of Warrington’s growth as a whole, whilst enabling incremental growth to the outlying settlements that will contribute to their long-term vitality.”

- 2.5 Story agrees that an exceptional circumstances case has been demonstrated and supports the release of Green Belt land around the outlying settlements including Culcheth, which will increase housing choice and support the vitality and viability of local services.

Question 7. What is the basis for the overall split of housing allocations and Green Belt release between land adjacent to the main urban area (at least 4,020 homes in Policy DEV1) and outlying settlements (at least 801 homes in Policy DEV1)? Is this justified?

- 2.6 The housing allocations proposed within the WUPSVL P are distributed across the remaining urban capacity identified, land adjacent to the urban area and outlying settlements.
- 2.7 The urban capacity comprises 1,200 homes at the site at Peel Hall (Policy MD4: Land at Peel Hall), a large green field site. Given the nature of the site, no alternative allocations of a comparable nature within the urban areas were identified that warranted allocation. The remaining capacity is therefore split between Green Belt release between land adjacent to the main urban area and outlying settlements.
- 2.8 Under preferred option 2⁴, the Council used an approximate capacity of 1,000 homes to be allocated to the outlying settlements. This is based on a 10% growth benchmark in each settlement, which the Council considers can be accommodated by existing infrastructure and which will not impact on the overall character of each of the outlying settlements. From the sites submitted to the Council to be considered for Green Belt release, land for the provision of 801 homes was identified. In line with the SA (August 2021), broadly speaking a higher number of units are directed to Lymm and Culcheth as these are the larger settlements with a broader range of services.
- 2.9 Having confirmed the capacity of the existing urban area and identified the sites to be allocated in the outlying settlements, the Council identified that the remaining balance of Green Belt release needed to be accommodated adjacent to the main urban area in accordance with the Plan’s proposed spatial strategy.
- 2.10 Story broadly agrees with the approach taken to the distribution of housing allocations. However, in order to meet the boroughs housing requirements Story considers that additional Green Belt release within outlying settlements is required. There are other sustainable sites which could be released from the Green Belt, which haven’t been considered during the preparation of the WUPSVL P, that can sustainably deliver new homes within outlying settlements. Further consideration for this is provided in Question 8.

⁴ Development Options and Site Assessment Technical Report (September 2021)

Outlying Settlements

Question 8. How were the site allocations in the outlying settlements selected, what factors were used to assess potential sites and what criteria were used?

- 2.11 To determine the most appropriate sites for Green Belt release, the Council undertook an assessment of sites submitted to the Council as part of a Call for Sites exercise (2017). Sites making a strong contribution to the Green Belt and Sites located within Flood Zone 3b⁵ were initially discounted. The remaining sites were then assessed against a set of criteria relating to performance against the Plan's Objectives and Sustainability Appraisal [SA] / Strategic Environmental Assessment [SEA] site assessment criteria to establish that the sites were 'suitable'. The remaining sites were then identified as meeting the required level of development for the proposed spatial option of 'incremental growth' in the outlying settlements.
- 2.12 The contender sites were identified and then compared for each settlement, taking into account their relative performance against the assessment criteria. This enabled confirmation of the final site(s) to be allocated for each settlement.
- 2.13 The site at Warrington Road, Culcheth was originally considered as part of the first batch of Green Belt Site assessments published in October 2016 and was identified as offering a 'weak' contribution to the Green Belt. The Site was then assessed in detail in November 2018 where it was determined the site to be suitable for development⁶. The site lies in a highly sustainable location with access to a range of shops, services and facilities within walking distance and is well served by public transport. The future development of the site will have positive economic, social and environmental benefits and therefore constitutes sustainable development. The Site Assessment Proforma of the site concludes that the site is considered to be achievable and is an area of moderate viability with known demand and no known abnormal development costs. The site was also considered by the Council within their Green Belt Site Selection Implications of Green Belt Release Report (August 2021) where the site was again determined to make a weak contribution to the Green Belt, identifying that the development of the site would not harm the overall function and integrity of the Green Belt around Culcheth.
- 2.14 Story continues to support the allocation of sites within outlying settlements, including the site at Warrington Road, Culcheth. It provides a sustainable location for residential development and will meet the clear and identified need for the release of Green Belt Land to meet the identified housing need.
- 2.15 In addition to supporting the proposed allocation at Culcheth, Story continues to promote additional land within Culcheth (Parcel 2 on the location plan at Appendix 1). This land is within the same ownership as the proposed allocation and is considered to be fully deliverable as it is available, suitable and achievable. Parcel 2 measures approximately 4.45ha. The two parcels combined has the potential to accommodate approximately 300 dwellings. Story wishes to make clear that this Matters Paper deals principally with the

⁵ Development Options and Site Assessment Technical Report (September 2021)

⁶ Proposed Submission Version Local Plan Site Assessment Proformas (2019)

land allocated within the WUPSVLP [Emerging Policy: OS2 Culcheth] and should be read in conjunction with the representations made to the Regulation 19 consultation held in 2021⁷. It is however considered that this parcel would be suitable for allocation or identified as Safeguarded Land should the Council seek to release additional land in Culcheth.

2.16 Whilst Story supports the current site allocations, as set out previously⁸ the Proposed Submission Version Local Plan 2017-2037 (March 2019) endorsed a higher minimum delivery figure for the outlying settlements of 1,085 homes, compared to the 801 homes now proposed. It is clear that the removal of additional Green Belt land to accommodate higher delivery figures around the outlying settlements has previously been endorsed by the Council. Story maintain the view that further release of Green Belt should be provided in order to meet identified housing needs.

2.17 Whilst Story support the principle of allocating sites in outlying settlements and the factors which have been used to assess potential sites, it is considered greater amounts of Green Belt should be released to meet the identified needs and consider that additional land for new homes should be allocated around the most sustainable outlying settlements to help address this requirement.

Question 9. What evidence fed into this process e.g. Green Belt Assessment, flood risk data etc?

2.18 The key evidence that supports the allocation of sites within the outlying settlements in the WUPSVLP is the Green Belt Site Selection – Implications of Green Belt Release (August 2021). Alongside this, the Council have also produced a combined report which collates all the previous Green Belt assessment work into the ‘Green Belt Site Assessments Collated Report’ (September 2021).

2.19 However, this Green Belt evidence base does not provide a wholesale review of the Green Belt in Warrington. Instead, it focusses on the sites which are proposed for allocation within the WUPSVLP.

2.20 Story continues to fully support the assessment of the site which establishes the removal of the site at Warrington Road, Culcheth from the Green Belt as proposed in Policy GB1, Policy OS2 and as identified on the Proposals Map. The land to be released was identified in the 2017 Green Belt Assessment as making a ‘weak’ contribution to the Green Belt purposes. The ‘Green Belt Site Selection Implications of Green Belt Release’ concludes that the site at Warrington Road, Culcheth:

⁷ Warrington Updated Proposed Submission Version Local Plan: Representations on behalf of Story Homes – Section 11 (November 2021)

⁸ Warrington Updated Proposed Submission Version Local Plan: Representations on behalf of Story Homes – Section 4 (November 2021)

“... currently makes a weak contribution to Green Belt purposes. Whilst development of the site would entail a small incursion into undeveloped countryside, the removal of the site from the Green Belt alongside the adjacent site (SHLAA Ref: 3337 / Site Ref: R18/P2/064) will not harm the overall function and integrity of the Green Belt around Culcheth. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries”.

- 2.21 Story would however question why there has only been a partial review of the Green Belt looking at the sites now proposed for allocation in isolation. Only three parcels of land around Culcheth fall within this ‘weak’ category’ with the remaining 12 being assessed as ‘strong’. Given the limited opportunities identified around Culcheth, and other Outlying Settlements, Story would have expected any additional sites put forward to have been assessed on a similar basis to ensure that all reasonable alternatives were properly considered to ensure consistency and robustness.
- 2.22 Also prepared as part of the evidence base, was a Local Plan Viability Assessment [LPVA] (August 2021) produced by Cushman and Wakefield (on behalf of the Council). Based on its analysis, Story has significant concerns in relation to the viability of a large proportion of the Council’s claimed supply, and the subsequent ability of the emerging Local Plan to deliver the required number of affordable dwellings over the plan period.
- 2.23 No regard has been paid to the viability of delivering a significant quantum of housing in Warrington Town Centre or Fiddlers Ferry and the impact this will have on the delivery of much needed affordable housing and social infrastructure such as schools and medical centres to cater for future resident’s needs. Failing to provide the required levels of social and physical infrastructure could result in the creation of many unsustainable and substandard communities which lack the basic social infrastructure required to thrive. Furthermore, the ever-growing affordable housing list will continue to spiral which has a direct impact on families across the Borough.
- 2.24 It is clear that the emerging Local Plan in its current form will not deliver on the required quantum of affordable housing or infrastructure provision across the Borough without significant alternative public sector funding being secured or identifying a number of strategic Green Belt allocations with the ability of delivering reasonable proportions of affordable dwellings. Story is concerned that the failure to identify a sufficient level of housing allocations in the Plan, which are viable, may result in the WUPSVLP being found unsound at Examination. Further analysis of the key viability concerns are set out within the representations submitted in November 2021⁹.
- Question 11. Which options were considered, why were alternative options discounted and why were the site allocations chosen?*
- 2.25 As set out in Question 8, the Council concluded there is not enough Brownfield land nor land in neighbouring authorities to meet its needs. Therefore, Green Belt release to promote sustainable patterns of development was identified as the only option available to

⁹ Warrington Updated Proposed Submission Version Local Plan: Representations on behalf of Story Homes – Section 4 (November 2021)

the Council. From this, the Council considered three high-level spatial strategies for the distribution of new homes within Warrington.

- 2.26 It was concluded that an approach focused entirely on the main urban area of Warrington would not provide a flexible approach to housing and could exclude the outer settlements from any benefits associated with growth. Conversely, an approach that dispersed development away from the urban areas would not be as likely to achieve the Plan objectives relating to regeneration, accessibility and economic growth. It was therefore concluded by the Council that incremental growth in outlying settlements would be the most balanced approach¹⁰.
- 2.27 Story supports the distribution of a proportion of the housing requirement to the outlying settlements through the release of land from the Green Belt. The distribution of development towards these sustainable settlements will also ensure that affordable housing is delivered across the authority area and meet the needs for housing development in each settlement.
- 2.28 Story does however believe that a higher minimum delivery figure for the outlying settlements, in line with that previously endorsed in the Proposed Submission Version Local Plan (March 2019), should be persuaded as a minimum.
- [Question 12. Was the methodology applied to site selection appropriate and were the conclusions of the process justified?](#)
- 2.29 Story agrees with the methodology applied to site selection and the conclusions of the process. However, Story is still of the opinion that the higher minimum delivery figure of 1,085 homes, endorsed by the Council in the Proposed Submission Version Local Plan 2017-2037 (March 2019), should be pursued rather than the 801 homes which is now proposed. This would therefore require consideration to be given to a number of other sites rather than the reassessment of sites that have previously been assessed as offering little to the purposes of the Green Belt. Story is therefore strongly of the opinion that the current version of the Warrington Local Plan does not meet the requirements of the Framework as it does not identify sufficient proportions of land to meet needs post 2038 or identify Safeguarded Land which could act as a failsafe in the event that one of the key strategic allocations does not come forward as envisaged.
- 2.30 Identifying Safeguarded Land does not allocate it for development, offering it the same level of protection that is afforded to the Green Belt; however, if the Council's Local Plan is not delivering the homes and employment land that it envisaged this land can be considered for development. The land identified in the Plan to meet needs beyond the plan period is predominantly from an increased proportion of unidentified windfall sites and strategic allocations delivering dwellings beyond the Plan period. There is no certainty that the unidentified windfall sites will come forward as envisaged. There is also considerable concern with regard to the delivery of some of the strategic sites delivering units beyond the Plan period, as set out in previous representations¹¹.

¹⁰ O1 - Development Options and Site Assessment Technical Report - September 2021

¹¹ Warrington Updated Proposed Submission Version Local Plan: Representations on behalf of Story Homes (November 2021)

- 2.31 Story is of the opinion that the identified Safeguarded land should be varied in size and location and be capable of coming forward in the short term should the need arise. The approach being taken by Warrington differs from that of its neighbouring authorities who do identify safeguarded land as well as large allocations which are delivering units beyond the Plan period (i.e. Cheshire East, St Helens and Halton). Halton and St Helens plans have been found sound at Examination and have subsequently been adopted in 2022 and Cheshire East consulted on Main Modifications until May 2022 .
- 2.32 This would allow any future Local Plan Review to allocate the safeguarded sites for development and ensure they are capable of delivering units in the first 5 years post adoption of the Review. Land should therefore be identified now and safeguarded to meet the needs beyond the Plan period.
- 2.33 The selection of the most appropriate sites to be safeguarded should be identified in a robust and consistent Green Belt Review and based on a robust Site Selection methodology which considers matters including sustainability, accessibility, deliverability and viability of the sites. In the first instance this should include consideration of sites previously given draft allocations that have been subsequently removed from the WUPSVLP.
- 2.34 Without the identification of sufficient proportions of Safeguarded Land within this Plan, it is not consistent with national policy. Furthermore, the identification of Safeguarded Land within the Plan represents a positive approach to planning, will futureproof the Plan and ensure that any issues associated with lack of supply not coming forward as expected can be addressed quickly through a Local Plan Review. This will avoid having to formally commence a new Green Belt Review and site selection exercise which, based on past experience, can be a slow and contentious process only worsening the supply position. Story considers that Parcel 2 of the land at Warrington Road, Culcheth is suitable for allocation alongside Parcel 1 or at least can be identified as Safeguarded Land.
- Question 13. Is the scale of housing growth in each of the outlying settlements justified?*
- 2.35 The WUPSVLP sets out the spatial strategy for Warrington which includes the ‘incremental growth’ across the outlying settlements of around 800 homes. This will see a minimum of 801 homes delivered on allocated sites to be removed from the Green Belt adjacent to outlying settlements with a minimum of 200 homes located within Culcheth. Story consider that the current distribution of a proportion of the housing requirement to the outlying settlements, including Culcheth, will not meet the identified housing need and additional allocations should be delivered in these sustainable settlements.
- 2.36 Whilst Story supports the allocation of housing within outlying settlements, Story consider there are further opportunities to allocate sites for housing within outlying settlements.
- 2.37 The SA (August 2021) sets out that, broadly speaking, a higher amount of growth should be directed to Lymm and Culcheth as these are the larger settlements with a broader range of services. Whilst a minimum of 200 dwellings are proposed in Culcheth, Story consider that a greater proportion of dwellings could be accommodated in this sustainable settlement and further consideration to proposed site allocations within Culcheth should be had.

- 2.38 Story consider there is a need to release further Green Belt land in order for the Council to meet its housing requirement. There are other sustainable sites which could be released from the Green Belt, which haven't been considered during the preparation of the WUPSVLP, that can sustainably deliver new homes within outlying settlements.
- 2.39 Story continues to promote Parcel 2, located adjacent to the proposed allocation at Warrington Road, Culcheth and considers that it would be suitable for allocation, or to be identified as Safeguarded Land should the Council seek to release additional land in Culcheth. Safeguarding the additional parcel of land adjacent to the draft allocation OS2 would act as a failsafe in the event that one of the key strategic allocations does not come forward as envisaged.

Appendix 1: Land at Warrington Road, Culcheth

Parcel 2 location plan



Parcel 1

Parcel 2

A574
B5212

Halcroft Ln

Clarke Ave

Warrington Ave

Warrington Rd



Appendix 2: Warrington Road Masterplan



DESIGNER'S NOTES

- 1 - The layout has been designed so that a unique sense of arrival is created immediately upon arriving at the development. Houses will face outwards towards Warrington Road set back behind attractively landscaped green spaces. A vista towards the arrival green has been created providing a welcoming and inviting environment.
- 2 - A well connected Arrival Green and nodal area, distinct in character it will help visitors navigate further into the development. This area will be framed by feature dwellings facing onto this important area.
- 3 - Courtyard serving higher density plots. Landscaping will soften edges and help delineate public and private realm.
- 4 - Small cul-de-sac serves a crescent of houses.
- 5 - Green space creates positive vista termination at the head of the street, it will allow panoramic views out of the development to the south. Houses are organically formed around it taking advantage of the views. Existing trees retained providing a mature landscape setting. A pedestrian cycle link connects the development together maximising pedestrian permeability.
- 6 - Landscaped green located at the head of this important route. This area will provide a nodal point helping navigate around the development.
- 7 - A series of nodal areas around the development will assist in navigation as well as providing attractive areas.
- 8 - Houses set back from Warrington Road facing out over a landscaped green wedge responding positively with this highly visible area.
- 9 - Landscaped Green will provide an attractive space at the head of the street. It will also provide a buffer between the development and the existing properties to the north. A pedestrian link will connect the development with the wider footpath network around the development.
- 10 - Small courtyard serving higher density plot.
- 11 - Pedestrian link runs north to south through the development. This area utilises the Gas pipe line easement which runs through the site.
- 12 - Pedestrian route crosses the street. Change in carriage width, colour and texture will help calm vehicle speeds. Only one vehicular crossing over the gas pipe line is permitted, this street layout connects Warrington Road with Holcroft Lane whilst discouraging 'rat running' through the development.
- 13 - Linear landscaped areas along the southern boundary will provide a soft edge to this important area. Plot positions and orientations will be organic in form, they will face out taking advantage of the long distant views to the south. Lower density plots will respond positively with this rural edge. A new pedestrian route will provide pedestrian permeability connecting the development together. Existing trees and hedges will be retained and enhanced.
- 14 - Arrival green located at the entrance into the development from Holcroft Lane. This area will create a completely different environment from the arrival green serving the Warrington Road access. This will ensure a unique sense of arrival is created from both access points into the development.
- 15 - Houses will face out onto Holcroft Lane set back behind a landscaped green wedge. Hedge and tree planting will help assimilate the development into the street-scape.