



Warrington Local Plan 2021-2038 Examination

Hearing Statement on behalf of Redrow Homes Ltd

Matter 7b – Site allocation - Culcheth

Relevant Site:

Land West of Culcheth (Call for Sites ref R18/P2/020; Land at Kirknall Farm)

July 2022

Respondent Ref Number: 2326

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Contents

1	Introduction.....	4
2	Matter 7b – Housing Land Supply.....	5

1 Introduction

- 1.1 This Statement has been prepared by Hive Land & Planning on behalf of Redrow Homes Ltd ('Redrow') and responds to the Matters, Issues and Questions released by the Inspectors on 23rd June 2022. In this submission Redrow are responding to **Matter 7b**.
- 1.2 The involvement of Redrow in the Warrington Local Plan Examination relates to the continued promotion of two sites for residential development, namely:
- Land West of Culcheth (Call for Sites ref R18/P2/020; Land at Kirknall Farm) – capable of delivering 350 to 450 new homes
 - Land at Glazebrook (Call for Sites ref R18/P2/021; Land west of Glazebrook Lane & Bank Street) – capable of delivering 600 to 700 new homes
- 1.3 Neither of the sites are currently identified as Housing Allocations in the Warrington Updated Proposed Submission Version Local Plan (WLP), but Redrow have promoted their inclusion within the WLP as Housing Allocations at each Local Plan consultation stage and maintain that these are sustainable and appropriate sites to release from the Green Belt and deliver new homes.
- 1.4 This Hearing Statement should be read in conjunction with the other statement being submitted by Redrow in response to **Matter 8**, which relates to Housing Land Supply. The conclusion drawn is that the Housing Trajectory at Appendix 1 to the WLP is overly optimistic in respect of the anticipated yield from various sources of supply and shortfall will exist during the plan period. Additional sites therefore need to be released from the Green Belt in order to meet this shortfall and the sites being promoted by Redrow in Culcheth can help to make up some of this shortfall.
- 1.5 We trust that this Statement assists the Inspectors in respect of the Examination.

2 Matter 7b –

Question 1. What is the background to the site allocation and how was it identified?

- 2.1 As the analysis in Section 4 of this representation outlines, Redrow consider that additional land needs to be identified for release from the Green Belt if Warrington's housing needs are to be met in full. It is within this context that Redrow are promoting land to the west of Culcheth as a suitable site for residential development. The Call for Sites reference and description is R18/P2/020 (Land at Kirknall Farm).
- 2.2 A detailed Masterplan and Development report, produced by Cass Associates (September 2018) is included at Appendix A to this representation. This Masterplan and Development Report has previously been submitted to the Council and accompanied Redrow's representations at the Proposed Submission stage of the Warrington Local Plan (WLP) in June 2019.
- 2.3 The report confirms that the site is available, suitable and achievable with a realistic prospect that housing will be delivered on the site within five years. It could therefore be considered 'deliverable' in accordance with the definition provided at Annex 2 of the National Planning Policy Framework (NPPF, 2021), should the site be allocated for residential development. The site is being promoted by Redrow, a major volume housebuilder with a proven track record of delivering high quality housing developments across the North West.
- 2.4 As set out within Redrow's Regulation 19 consultation response, Redrow consider that a shortfall of approximately 5,318 dwellings exists in Warrington's proposed housing land supply across the Plan period. In order for Warrington to meet its minimum housing requirement needs, Redrow consider it will be necessary for the Council to propose new Housing Allocations. Land west of Culcheth, Warrington is a logical extension to the settlement and the site is considered capable of delivering around 350 to 450 new homes, which is a significant and sustainable contribution towards Warrington's housing needs.
- 2.5 The following section provides a justification to direct additional housing growth towards Culcheth as a settlement in particular.

Justification to identify new Housing Allocations in Culcheth

- 2.6 Redrow support the conclusion of the WLP that exceptional circumstances exist to justify the release of Green Belt land to meet housing needs.
- 2.7 As set out within Redrow's Matter 8 Hearing Statement, it is a significant risk for the WLP housing strategy to rely upon Warrington Town Centre, the Waterfront Main Development Area and Fiddlers Ferry in particular to make such a considerable contribution towards meeting housing needs. As a result, Redrow consider that additional sites, including the Land West of Culcheth, must be identified for development and proposed for release from the Green Belt to ensure Warrington's housing needs, including affordable housing, are met in full.
- 2.8 At the very least, the WLP must ensure sufficient safeguarded land is allocated and an appropriate trigger mechanism included within the Plan to ensure Warrington Borough Council can achieve, and then maintain, a five year housing land supply.
- 2.9 Paragraph 3.3.14 of the WLP states that as part of the spatial strategy, incremental growth within the settlements (outside the main urban area of Warrington) will:
- "...provide housing choice and help support local services without placing unacceptable pressure on local infrastructure..."*
- 2.10 As part of this strategy, the WLP allocates around 800 homes within the outlying settlements, including a minimum of 200 homes towards Culcheth and has identified a single Housing Allocation under Policy OS2 ('Culcheth'), Land east of Culcheth to be removed from the Green Belt in order to meet this target. Redrow consider that as part of identifying additional housing allocations, more growth should be directed to sustainable locations for growth in the outlying settlements. Culcheth in particular should have additional growth directed towards the village, given its status as one of only two outlying settlements included as a 'neighbourhood centre' within the 'Hierarchy of centres' proposed by draft Policy DEV5. This provides clear justification for an increased proportion of housing growth to be directed towards Culcheth.
- 2.11 This allocation at Land east of Culcheth is carried forward from the previous Post Submission Version of the WLP (2019). Notably however, this differs from the Preferred Development Option Consultation

(July 2017), which proposed a distribution figure of 300 for Culcheth. As Culcheth is the second largest outlying settlement, behind Lymm, Redrow view the reduction in housing target for Culcheth as unjustified and consider that the sustainability of Culcheth as a settlement means that the village could support more growth, without the unacceptable pressure on local infrastructure that the Plan seeks to avoid. The fact that the Plan has only identified a single allocation in Culcheth may compromise the ability of Culcheth to meet its own local housing needs and will not widen the choice of housing, including affordable housing, available in the village.

- 2.12 The *Settlement Profile* for Culcheth that formed part of the Evidence Base for the 2017 consultation (2017, Warrington Borough Council) confirms the sustainability of the village, due to the accessibility of a range of shops and services within Culcheth. The Settlement Profile confirms that there are three Primary Schools, a Secondary School and two GP surgeries. The neighbourhood centre, in 2017, contained amenities including a library, village hall and three churches in addition to two supermarkets and two banks. In addition, the profile outlines the presence of a community centre, 2 scouts/rangers and one children's centre. The Settlement Profile also outlines the range of leisure facilities and sports pitches available within the village.
- 2.13 The analysis concluded that additional growth in Culcheth can be accommodated subject to expansion of primary school provision, providing the opportunity to provide up to 300 homes in addition to the 70 identified in the SHLAA. The profile concludes that such incremental growth could enable sustainable development within Culcheth whilst respecting the settlement character objectives.
- 2.14 The *Sustainability Appraisal Report* (dated August 2021) outlines at Paragraph 6.2.6 that the spatial strategy confirms that:

"... an incremental approach to growth would be taken at the outlying settlements. Broadly speaking, this involves a higher amount of growth being directed to Lymm and Culcheth as these are the larger settlements with a broader range of services."

- 2.15 Appendix B of the *Sustainability Appraisal Report* (AECOM, August 2021) provides an appraisal of the likely significant effects depending on the growth aspirations and spatial strategy pursued by the Plan. It is acknowledged that some settlements, including Culcheth could absorb incremental growth without having a negative effect on health services. It is also acknowledged that development at Lymm and Culcheth is

more likely to be accessible to a wider range of services and facilities. In an increased dispersal scenario, the SA outlines that greater dispersal to outlying settlements may support new facilities and services in areas including Culcheth and Lymm. Culcheth (alongside Burtonwood and Winwick) is also described as “perhaps less sensitive” in built heritage terms, compared to other settlements.

- 2.16 The sustainable credentials of Culcheth are acknowledged by the *Sustainability Appraisal Report* and other Local Plan evidence base documents. In addition, Culcheth and Lymm are the only outlying settlements to be classed as a “Neighbourhood Centre” in the hierarchy of centres under Policy DEV5 (Retail and Leisure Needs). Therefore, the evidence clearly justifies a much higher housing distribution figure than the 200 dwellings currently proposed, particularly as the settlement is constrained by the Green Belt (resulting in a limited capacity within the urban area to contribute towards Local Housing Needs, including affordable housing needs).
- 2.17 Table 10 below outlines each of the outlying settlements proposed in respect of the percentage housing growth proposed in the WLP, with regard to their existing size. Culcheth has the second lowest level of housing growth proposed (just 8%), second only to Lymm’s percentage growth of just 6%. Culcheth’s growth is limited to a single site, where as Lymm’s is distributed across two sites. As outlined above, Culcheth and Lymm are the most sustainable outlying settlements in the Warrington Borough and the Table confirms that there is a constrained level of housing growth in both settlements, despite their Neighbourhood Centre status and capacity of the settlements to accommodate a much higher number.
- 2.18 There is no justification provided to direct a higher proportion of incremental growth towards less sustainable settlements, constraining the level of housing growth in Culcheth to this extent.

Table 1: WLP distribution towards the outlying settlements.

Settlement	No. of existing households (2017)	WLP allocations (2021)	% increase in households
Croft	606	75	12%
Culcheth	2, 495	200	8%
Hollins Green	371	90	24%
Lymm	4, 961	306	6%
Winwick	866	130	15%

2.19 We have also carried out a comparison with the 2017 Preferred Development Options consultation and the 2021 Updated Proposed Submission Version which are set out in Table 2 below. As the allocation at Burtonwood has been removed, its % change since 2017 is the greatest. Excluding Burtonwood, Culcheth and Lymm are the only other settlements to have their housing growth figures reduced, despite being the most sustainable outlying settlements.

Table 2: Summary of WLP distribution towards the outlying settlements and comparison with 2017 Preferred Options & 2021 Updated Proposed Submission Version

Settlement	WLP allocations (2021)	WLP allocations (2019)	Change (%) 2019 to 2021	WLP allocations (2017)	Change (%) 2017 to 2021
Burtonwood	0	160	-160 (-100%)	150	-150 (-100%)
Croft	75	75	0 (0%)	60	+15 (+25%)
Culcheth	200	200	0 (0%)	300	-100 (-33%)
Hollins Green	90	90	0 (0%)	40	+50 (+125%)
Lymm	306	430	-124 (-28%)	500	-194 (-39%)
Winwick	130	130	0 (0%)	90	+40 (+44%)
TOTAL	801	1,035	-234 (-23%)	1,190	-389 (-33%)

2.20 As in 2019, no evidence is provided to justify the reduction of housing proposed in Culcheth since the 2017 version and secondly, why such a low level of housing growth is appropriate for a sustainable settlement of this size with greater accessibility to key facilities within the Neighbourhood Centre.

2.21 In the interests of planning for sustainable growth and in the context of Redrow's concerns regarding the potential shortfall from other sources of housing land supply, our view is that a much higher level of housing growth should be directed towards Culcheth.

Quantifying the appropriate level of housing growth for Culcheth

2.22 Setting aside Lymm, which as the second largest urban area in Warrington Borough and has also been inexplicably constrained, the average levels of growth in Croft, Hollins Green & Winwick (all significantly smaller and less sustainable settlements than Culcheth) is 17%. Applying this to Culcheth would result in

a baseline housing target of 424 (17% growth in relation to the 2,495 existing households). Adjustments to this figure would then need to be made to allow for the delivery of infrastructure, boost the supply of affordable housing and making up the anticipated shortfall from other sources of housing land supply.

- 2.23 Redrow's anticipated shortfall from existing sources of housing land supply, including the constrained capacity of the urban area, should be addressed through the identification of new housing allocations in the Green Belt. The baseline housing distribution figure of 424 proposed for Culcheth above, represents just 2.6% of Warrington's total requirement (16,157) over the Plan period. A slightly higher amount of incremental growth at Culcheth would still be in keeping with the overall spatial strategy of the WLP, which encourages incremental growth at outlying settlements.
- 2.24 Applying the same proportionate percentage to the anticipated 5,318 shortfall would see Culcheth delivering a further 138 dwellings, increasing the distribution figure to 562 dwellings. This is simply an updated baseline figure based purely upon the size of the existing settlement and a realistic quantum of housing delivery from all sources of housing land supply across the plan period.
- 2.25 As outlined above, the *Sustainability Appraisal Report* (SA) recognises that an 'incremental' approach to growth in the outlying settlements would be taken. Paragraph 6.2.6 confirms that broadly speaking "*this involves a higher amount of growth being directed to Lymm and Culcheth as these are the larger settlements with a broader range of services*". As outlined above, this strategy is not followed through with respect to the levels of proportional growth proposed at the outlying settlements.
- 2.26 The *Sustainability Appraisal Report* (AECOM, August 2021) mentions Culcheth in the context of a number of key indicators, as having the ability to accommodate a greater level of growth due to its role as a neighbourhood centre. It is acknowledged that some settlements, including Culcheth could absorb incremental growth without having a negative effect on health services. It is also acknowledged that development at Lymm and Culcheth is more likely to be accessible to a wider range of services and facilities. It should also be noted that Culcheth supports the day to day needs of residents elsewhere in the Borough, such as Croft and Glazebury. In an increased dispersal scenario, the SA outlines that greater dispersal to outlying settlements may support new facilities and services in areas including Culcheth and Lymm. Therefore, it is entirely justified to conclude that a greater level of housing growth in Culcheth

would support existing facilities and contribute towards increasing school capacity and GP provision, which would also benefit a wider catchment area than just Culcheth itself.

- 2.27 In addition to the sustainability of the settlement, Culcheth (alongside Burtonwood and Winwick) is also described by the SA as “perhaps less sensitive” in built heritage terms, compared to other settlements and is therefore able to accommodate higher levels of growth without resulting in development affecting heritage assets.
- 2.28 Culcheth (which forms part of ‘North East Warrington’ along with Croft and Glazebury) is acknowledged as an attractive place to live in the Warrington Local Housing Needs Assessment (GL Hearn, August 2021; Ref H2) and is the second most popular housing market area behind Lymm. As a result, this strong demand for homes results in very little choice for those actively seeking to purchase a home. This has had a knock-on effect in respect of affordability.
- 2.29 Table 52 of the Warrington LHNA 2021 confirms that NE Warrington has the highest proportion (46.6%) of estimated need for social/affordable rented housing from newly forming households than any other sub area across Warrington. Table 56 then establishes a net need of 29 affordable dwellings per annum in NE Warrington, which demonstrates the acute affordability issues that exist in the Culcheth area.
- 2.30 The LHNA confirms that 23.1% of the total population in NE Warrington (Culcheth, Glazebury and Croft) were aged 65+ compared to 18.9% across Warrington district as a whole. There is therefore a need to ensure that new family housing is brought forward in Culcheth to redress this balance and ensure the local population continues to support local services and schools.
- 2.31 It is in this context that the baseline figure of 562 dwellings established above should be increased to ensure a sufficient critical mass of housing at Culcheth, which will result in tangible social and economic benefits alongside new housing. In our view, a housing distribution figure of circa 600-700 homes to Culcheth is entirely reasonable, considering the sustainability credentials of the settlement and the need to ensure Green Belt boundaries endure beyond the Plan period, in accordance with the National Planning Policy Framework (NPPF).
- 2.32 Growth of between 600-700 homes equates to an approximate increase in the size of the settlement of between 24-28%. Hollins Green is currently proposed to grow by 24% and so this approach is endorsed

by the WLP. In fact, as the *Sustainability Appraisal* highlights, higher levels of growth at Culcheth and Lymm is a sustainable strategy, as the outlying settlements with the most accessible range of shops, services and facilities. This growth of the settlement by approximately 24% is adjusted upwards proportionately from the average 17% of growth at outlying settlements, as outlined above in Paragraph 2.22 due to the housing supply shortfall Redrow has estimated will occur based upon the evidence supporting the Plan.

- 2.33 A housing distribution figure of between 600-700 homes is entirely appropriate for Culcheth as a settlement and will enable an increase in delivery of much needed affordable housing in the village. Occupiers of affordable housing typically have lower levels of car ownership and so accessible shops and services, such as those available in Culcheth, are even more important for such residents.
- 2.34 As outlined above, a housing distribution figure of around 600-700 homes is entirely appropriate and proportionate to the size of the settlement and range of accessible shops and services within the Neighbourhood Centre.

Land West of Culcheth (Call for Sites ref R18/P2/020; Land at Kirknall Farm)

- 2.35 As confirmed within the Matter 8 Hearing Statement, Redrow consider that additional land needs to be identified for release from the Green Belt if Warrington's housing needs are to be met in full. Our analysis in this Hearing Statement and the Regulation 19 consultation response further confirms that a greater proportion of housing should be directed towards Culcheth to not only meet an overall quantitative need but also to address an acute shortage of affordable housing and to address the issues related to an ageing population within the settlement in order to support local services and schools.
- 2.36 It is within this context that Redrow are promoting land to the west of Culcheth as a suitable site for residential development. The Call for Sites reference and description is R18/P2/020 (Land at Kirknall Farm).
- 2.37 A detailed Masterplan and Development report, produced by Cass Associates (September 2018) was provided at Appendix A to Redrow's Regulation 19 representation, which confirms that the site is available, suitable and achievable with a realistic prospect that housing will be delivered on the site within five years. The masterplan clearly demonstrates that the site is capable of being delivered in a number of distinct phases, owing to landscape features and land ownerships. As a result, there is also the opportunity to

allocate some early phase(s) for housing within the WLP now and identify the remaining parcels as safeguarded land in order to help meet longer term needs.

- 2.38 The Regulation 19 response also undertakes a detailed analysis of the Sustainability Appraisal of the Site (some of the conclusions in the Council's assessment are questionable) and confirms that Land West of Culcheth is the most sustainable site in Culcheth and should accordingly be allocated for residential development.
- 2.39 A Green Belt Assessment of the Redrow site itself rather than the wider parcel within which it has been considered in the Arup GBA was undertaken in the Regulation 19 response. Redrow's firm view remains that the land West of Culcheth makes far less of a contribution towards the purposes of including land within the Green Belt than the allocated Warrington Road site, especially since it is the most logical location to adjust Green Belt boundaries in Culcheth, infilling the land between existing residential areas and the durable boundary of Culcheth linear park. Therefore, Redrow consider that Land west of Culcheth is more suitable for release from the Green Belt than the allocated Land east of Culcheth.
- 2.40 The evidence base supporting the WLP, including the Sustainability Assessment, Settlement Profiles, Development Options and Site Assessment Technical Report and Green Belt Assessments have clearly considered the Land West of Culcheth to be a suitable and sustainable location for housing in respect of the WLP objectives. Therefore, the site should be identified as a Housing Allocation, or at the very least a safeguarded site which is removed from the Green Belt and is brought forward for development should the WLP strategy, focusing on Warrington's existing urban area, fail to deliver the housing requirement as envisaged.

Hearing Statement on behalf of Redrow Homes Ltd
Matter 7b – Site allocation - Culcheth