

# **Warrington Local Plan 2021-2038: Examination in Public**

Hearing Statement by Peel L&P (Holdings) UK  
Ltd (representor no. UPSVLP 0426)

Matter 7b: Site Allocation – Culcheth

August 2022

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**Client**

Peel L&P (Holdings) UK Ltd

**Our reference**

PEEM3056

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# 1. Introduction

- 1.1 This Statement is prepared by Turley on behalf of Peel L&P (Holdings) UK Ltd (hereafter called 'Peel') in respect of the examination of the Warrington Local Plan 2021-2038. It provides Peel's responses to the Matters, Issues and Questions ('MIQs')<sup>1</sup> identified by the Inspectors in respect of Matter 7b: Site Allocation – Culcheth.
- 1.2 The context to Peel's representations, including its development interests in the Borough, is set out in its Matter 1 statement.
- 1.3 This Statement should be read alongside Peel's statements in relation to Matters 1, 3, 4, 6a, b and c, 7a, c and d, 8, 11 and 14. It should also be read alongside statements submitted jointly on behalf of Peel L&P (Holdings) UK Ltd and Peel Ports (representor number UPSVLP 0438) which relate specifically to Peel's land interest at Port Warrington and Warrington Waterfront.
- 1.4 This Statement focusses on the proposed allocation in the Outlying Settlement of Culcheth.
- 1.5 Peel is promoting a site in Culcheth ('Land north-east of Culcheth') for residential purposes and has made submissions seeking its allocation at previous stages of the Local Plan. It is capable of accommodating around 300 homes and country park, open space, highway improvements and, potentially, a new drop-off facility for Culcheth High school, within the plan period with the remainder of the site being designated as safeguarded land for development needs beyond.
- 1.6 Peel's representations to the Updated Proposed Submission Version Local Plan ('UPSVLP') demonstrate that the site is capable of accommodating a sustainable residential development and that it performs better than the proposed allocation when assessed against the criteria used by Warrington to assess potential allocations and is therefore a more appropriate and sustainable allocation than the Council's proposed allocation. It is able to offer significant additional benefits for existing and future residents that the Council's proposed allocation is not capable of delivering.
- 1.7 A Development Prospectus for Peel's site to the North East of Culcheth and an associated technical and environmental evidence base formed part of Peel's representations to the UPSVLP<sup>2</sup> which demonstrates that the site is developable and can be delivered in an acceptable manner over the plan period or beyond.

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<sup>1</sup> ID02

<sup>2</sup> UPSVLP-0426-P12

## 2. Matter 7b: Site Allocation – Culcheth

### Q1: What is the background to the site allocation and how was it identified?

- 2.1 Potential development sites have been considered through the evidence base, with OS2 assessed through the Site Assessment Proformas report November 2018, undertaken to inform the Proposed Submission Version Local Plan in 2019 (Site refs. 3157 / R/18/097).
- 2.2 The assessment includes the scoring of the potential sites against numerous criteria. Peel's representations to the UPSVLP demonstrated that the scoring of its site<sup>3</sup> (Site refs. R18/12B and 2656) understated numerous beneficial aspects and overstated the extent of constraints. Appendix 7 of Paper 4 submitted as part of Peel's representations<sup>4</sup> presented a revised assessment and compares it to the assessment of OS2. Conversely, some constraints relating to OS2 are downplayed. Peel's reassessment demonstrates that if the performance against a number of criteria is reappraised, reflecting up to date information / evidence and a more objective assessment approach, Peel's site performs better than OS2 in relation to a number of assessment criteria and therefore better overall.
- 2.3 In addition, Peel's site makes provision for safeguarded land for future development needs beyond the plan period. This was not considered as part of the site assessment process. The proposed allocation does not make such provision and therefore is fundamentally deficient to Peel's site in terms of its ability to contribute to future development needs, having regard to the need to define Green Belt boundaries that will endure beyond the plan period. This matter is considered further below.
- 2.4 Peel's proposed site will also deliver several other major benefits in the form of strategic open space, local open space, highway improvements and the potential for a drop-off facility for Culcheth school. These aspects enhance the extent of benefit of allocation and the overall sustainability of the site; these factors are not taken into account in the site assessment.

### Q2: What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?

- 2.5 The proposed site corresponds almost identically with Green Belt Parcel (CH9) defined and assessed through the Council's Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) (2017) ('GBA'). It is identified as making an overall weak contribution to the Green Belt through the GBA.

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<sup>3</sup> Contained within the Site Assessment Proformas report November 2018

<sup>4</sup> UPSVLP-426-P4

- 2.6 This overall conclusion turns principally on the appraisal against Green Belt Purpose 3 (to assist in safeguarding the countryside from encroachment) where the site is deemed to make only a moderate contribution.
- 2.7 Peel's representations demonstrate, however, that based on the site's interface with and exposure to the wider expanse of Green Belt (including to Parcel CH10 which the Council's Green Belt Assessment identifies as making a strong overall Green Belt contribution) it is concluded that the site makes a strong overall contribution to the Green Belt.
- 2.8 In contrast, the site promoted by Peel would have a lesser impact on the Green Belt, reflecting that the parcel assessed in the GBA is incorrectly drawn, having regard to the GBA's methodology. The revised parcel would make a moderate Green Belt contribution and the form of development proposed by Peel would minimise the effect on the Green Belt.

**Q3: What would be the effect of developing the site on the purposes of the Green Belt?**

- 2.9 Given the conclusions of Peel in respect of the overall contribution, Peel considers that the development of the site would result in significant harm to the Green Belt reflecting its conclusion that the site makes a strong contribution to the Green Belt.
- 2.10 Development in the absence of a strong and durable boundary raises a significant risk of future encroachment. This is a fundamental shortcoming of the proposed allocation, reflecting its physical characteristics.
- 2.11 The resultant harm can be avoided if the site promoted by Peel is allocated in preference, reflecting that it makes a lesser contribution to the Green Belt. Peel's proposal provides the benefit of providing a strategy for the long-term planned and managed growth of the settlement, through an initial plan-period development and then a natural and logical second phase of development beyond the plan-period utilising land to west. This reflects the need for the Outlying Settlements to accommodate safeguarded land to meet development requirements beyond the plan period.
- 2.12 In this context there are significant advantages to locating safeguarded land where it can build on and be planned as part of plan period releases, thus reducing the number of separate Green Belt releases in the settlement and avoiding a piecemeal approach to its long-term growth. Candidate Green Belt releases need to be considered in this context.

**Q4: Are there exceptional circumstances to alter the Green Belt in this particular case? If so, what are they?**

- 2.13 Peel supports the Council's position that exceptional circumstances exist to justify the release of land from the Green Belt including around the Outlying Settlements.

- 2.14 The Council has demonstrated that this is necessary in order to meet the Borough's housing and employment needs and has sought to maximise the use of land outside the Green Belt as a first priority.
- 2.15 In doing so it has demonstrated that this need cannot be met in full through land outside of the Green Belt.
- 2.16 Exceptional circumstances are therefore considered to exist and warrant a Green Belt boundary review in order that the Borough's full plan period housing and employment needs can be met.

**Q5: What is the basis for the scale of development proposed and is this justified?**

- 2.17 The UPSVLP proposes to allocate a site (OS2) with a capacity of **at least** 200 dwellings, reflecting the minimum housing number identified for Culcheth through Policy DEV1. It is Peel's view that this is consistent with the proposed strategy of 'incremental growth' within Culcheth and the other Outlying Settlements of the Borough. Culcheth is also of a sufficient size and scale to offer a range of services and facilities to contribute towards the sustainability of development. An allocation of at least 200 dwellings is reflective of the scale of Culcheth, being a proportionate addition. The minimum of 200 homes, as set out in Policy DEV1, is supported.
- 2.18 Peel's position, however, is that Culcheth's development requirement would be more sustainably met through the release of land north-east of Culcheth as proposed by Peel.

**Q14. Are any main modifications necessary for soundness?**

- 2.19 Peel considers that the proposed allocation in Culcheth is unsound as the approach to selecting it as a potential allocation is:
- not justified by evidence, with the assessment of the Green Belt not reflective of the methodology such that the proposed application actually makes a strong contribution to the Green Belt in Peel's view;
  - not positively prepared – failing to capitalise the advantages offered by the Land north-east of Culcheth, in respect of the range of additional facilities and benefits it can provide; and
  - contrary to national planning policy in respect of ensuring that new Green Belt boundaries endure beyond the plan period.
- 2.20 These issues could be remedied by allocating the land promoted by Peel north-east of Culcheth.
- 2.21 Peel's Matter 3 statement has also set out the need for the allocation of Safeguarded Land within the Outlying Settlements in order to satisfy paragraph 140 of the NPPF. Peel's land north-east of Culcheth would be suitable for such an allocation in this context, given the evidence base submitted by Peel which demonstrates that the site is developable in an acceptable and sustainable manner.

Turley Manchester



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