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**REDROW HOMES LIMITED
(LANCASHIRE AND NORTH WEST DIVISIONS)**

**WARRINGTON LOCAL PLAN REVIEW
SCOPE AND CONTENT**

**McAteer Associates Ltd
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1 Introduction

- 1.1** These representations to the Warrington Local Plan Review : Scope and Content have been prepared on behalf of Redrow Homes Limited (Lancashire and North West Divisions). Redrow Homes are a major national house builder who have delivered housing in Warrington over many years, and have significant land interests in the Borough.
- 1.2** Redrow Homes are always keen to work with Councils in plan preparation and hope that the following comments on selected questions in the consultation document will be of assistance going forward.
- 1.3** The following sections of these submissions set out the comments of Redrow Homes in respect of selected questions in the Scope and Content Document.

2 Question 1: Do you have any comments to make about the Council's evidence base?

- 2.1** Redrow Homes consider the range of evidence will allow proper consideration of the objectively assessed needs of the Borough, but are concerned that the evidence base is kept up to date as far as possible. This is especially the case in assessing housing needs and the availability of land to meet those needs, and to ensure that choice of housing type and location meets the requirements of the Borough.
- 2.2** They are concerned however, that the Council's Green Belt Assessment is based on arbitrary judgements and decisions. There is no sound basis for the way in which parcels of land have been linked to create strategic assessment parcels, and there is no explanation as to why the strategic assessment parcels are of different sizes. The Assessment states the strategic parcels were identified using desk based analysis and site visits only took place in the stage 2 assessment. It is respectfully submitted that site visits should have been part of the initial assessment. How can the strategic parcel boundaries be properly identified from a plan? By not carrying out site visits in the first instance, the classification of strategic parcels has the ability to influence the site specific analysis either positively or negatively.

- 2.3 The Green Belt Assessment states at paragraph 145 that comments have been made by neighbouring authorities, and amendments have been made. It is respectfully submitted that in the interests of fairness and openness, these should be publically available as part of the evidence base.
- 2.4 Redrow Homes also share the concerns expressed by the HBF in respect of cross-boundary issues and their impact on housing market areas. They also agree the influences of the Greater Manchester and Liverpool City Regions should be factored into the Local Plan Review.
- 3 **Question 2:** Do you consider the assessment of Housing Needs to be appropriate?
- 3.1 Redrow Homes agree that the Objectively Assessed Need (OAN) should be the starting point of any assessment before then considering the Council's economic growth aspirations and market signals.
- 3.2 They note the use of the 2016 'Mid-Mersey Strategic Housing Market Assessment' plus the addendum in setting the housing needs, and again consider this base figure should be revisited before the Local Plan Review is submitted as they believe the figures used may prove to be at the lower end of any range in figure of housing need for the Local Plan Review period.
- 3.3 In particular they note that by using both the January and October OAN figures there is no consideration as to how this uplift impacts on affordable housing. The later, higher figure is stated to be attributed to jobs growth, and if the same numeric level of affordable housing is required, based on stated evidence, then in percentage terms the addendum should have advocated a lower affordable housing requirement say 22% compared to the 26% recommended in the Lower January OAN.

4 Question 4: Do you consider the alignment of Housing Needs and Jobs Growth to be appropriate.

4.1 Redrow Homes support the Local Plan Review in seeking to align housing needs and job growth. Such an approach is consistent with the guidance in the National Planning Policy Framework.

4.2 However, Redrow Homes consider the Council must be able to provide evidence that economic growth and the number of dwellings it is expected to generate is both achievable and properly reflects both the historic and forecast level of growth. They are concerned that given Warrington's past record of strong economic growth, that the Council are properly optimistic in forecasting future growth.

5 Question 5: Do you consider the assessment of Land Supply to be appropriate?

5.1 Redrow Homes have not been able to make a site by site assessment of the Council's Housing Land Supply at this time. However, based on their past experience both in Warrington and elsewhere, they are concerned that the Council is reliant on historical windfall completions which are often subject to double counting and the assumption that completions will continue at the same rate. It is noted that the NPPF urges caution over these assumptions, and it is considered further analysis is required to justify these two sources of supply. It is suggested that a 20% discount is applied to these assumptions in the same way that the NPPF uses this figure in 5 year housing land supply.

5.2 For this reason, Redrow Homes consider the Council should ensure the Review contains an over provision to counter non-delivery. Such an approach would also be prudent given the Council's economic growth aspirations.

- 6 **Question 6:** Do you consider that Green Belt land will need to be released to deliver the identified growth?
- 6.1 Redrow Homes consider it is inevitable that Green Belt land will be required if the Borough is to meet its own needs for housing and employment.
- 7 **Question 7:** Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan Review?
- 7.1 Redrow Homes consider the three strategic matters are appropriate especially the first, given the successful legal challenge to the current Core Strategy. However, it should be made clear that the housing and economic land provision are properly aligned.
- 8 **Question 8:** Do you agree that further land will need to be removed from the Green Belt and safeguarded for future development needs beyond the Plan period?
- 8.1 Redrow Homes consider it essential that the Local Plan Review identifies Safeguarded Land. Such an approach is advocated by the NPPF which states Green Belt boundaries should not need to be altered at the end of the development plan period (paragraph 85). Furthermore given this point it is submitted that Green Belt boundaries should be capable of enduring for more than the timescale of another plan period, of 20 years.
- 8.2 They consider that such an approach will bring certainty to all parties involved, from residents through to developers.
- 9 **In Closing**
- 9.1 Redrow Homes would request the Council give consideration to the future distribution of growth, especially housing, when preparing the review. The Council should be aware that the larger settlements in the Warrington Green Belt possess a sophisticated range of facilities and available sites, albeit some are currently in the Green Belt,

which are well related to existing transport infrastructure, and are capable of helping the Council meet its housing needs in line with emerging policy.

9.2 Redrow Homes hope that the Council consider the above comments to be of assistance in its Local Plan review, and would be happy to discuss the comments further if required.

9.3 Redrow Homes would also like to be kept informed of future consultations upon the Local Plan or other related planning documents.