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Warrington Borough Council

Local Plan Review

Regulation 18 Consultation: Standard Response Form

October 2016

Question 1

Do you have any comments to make about the Council's evidence base?

Use of the Green Belt Assessment

The Warrington Local Plan Review covers a 20 year period. However in relation to the Green Belt a longer term perspective is necessary, because the National Planning Policy Framework requires any review of Green Belt boundaries to have, “*regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*” (NPPF paragraph 84).

Consequently this once-in-a-generation Green Belt review needs to consider the release of enough Green Belt land to cater for two plan periods, as neighbouring local planning authorities have done, in order to be consistent with the Framework.

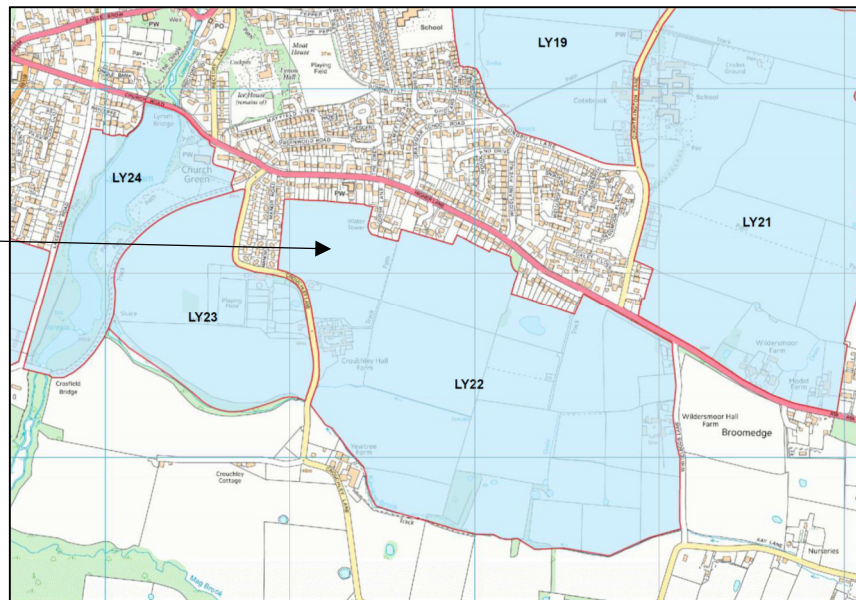
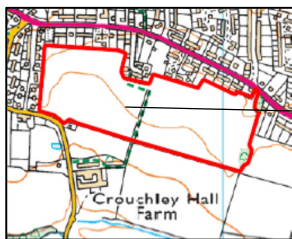
The Green Belt Assessment is of necessity a fairly broad brush treatment of relatively large land parcels. Some of its outcomes are challengeable at a smaller scale. However the Green Belt Assessment is an initial assessment only, and its authors recognise, “*there will be the need to undertake more detailed site specific assessment work as part of the Local Plan Review process.*” (paragraph 6, page 1 of Arup's report).

Our comments on the Green Belt Assessment are directed towards that next stage, in which further, more detailed and accurate assessment will take place in relation to sites submitted as part of the Council's 'Call for Sites' process.

Land East of Crouchley Lane, Lymm (Site 2901)

Site 2901 is a 13.4 hectare site that comprises only 19% of the 70 hectare Green Belt parcel LY22. When the methodology is used in relation to this smaller parcel, it is apparent that its contribution to the purposes of the Green Belt is less than for the parcel as a whole.

Site 2901



Purposes of the Green Belt	Arup comments on parcel LY22 (page H9)	Our comments in relation to site 2901
1: to check the unrestricted sprawl of large built-up areas	<i>“No contribution: The parcel is not adjacent to the Warrington urban area and therefore does not contribute to this purpose”</i>	No contribution

2: to prevent neighbouring towns merging into one another	“No contribution: <i>The parcel does not contribute to preventing towns from merging.”</i>	No contribution
3: to assist in safeguarding the countryside from encroachment	“Strong contribution: <i>The parcel is connected to the settlement on its northern and north western sides along hedge lined garden boundaries. These are not durable and would not be able to prevent encroachment into the parcel. The parcel’s boundaries with the countryside largely consist of hedge and tree lined field boundaries, as well as the unmade Whiteleggs Lane along the eastern boundary. These boundaries are not durable and would not be able to prevent encroachment beyond the parcel if the parcel was developed. The existing land use mainly consists of open countryside. There is moderate vegetation forming internal hedgerow boundaries within the parcel and a small number of active farms. There are also a small number of residential properties in the parcel’s north eastern corner and the parcel helps to prevent further encroachment along Higher Lane. The parcel supports long line views of the surrounding countryside and overall supports a strong degree of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment.”</i>	Moderate contribution There is existing residential development on two and a half sides of the site. A woodland copse on the eastern boundary provides strong boundary in this direction that would contain encroachment in the long term if the parcel were developed. This containment weakens the contribution made to this purpose.
4: to preserve the setting and special character of historic towns	“Weak contribution: <i>Lymm is a historic town. The parcel does not cross an important viewpoint of the Parish Church. The north western edge of the parcel is located within the 250m buffer area around Lymm Conservation Area. The Conservation Area is separated from the Green Belt and from the parcel by modern residential development along Manor Road. Therefore the parcel makes a weak contribution to preserving the setting and special character of historic towns.”</i>	Weak contribution
5: to assist in urban regeneration, encouraging the recycling of derelict and other urban land	“Moderate contribution: <i>The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.”</i>	All sites in the study score equally on this measure; consequently, it does not help distinguish between different sites.
Overall Assessment	“The parcel makes a strong contribution to one purpose, a moderate contribution to one and no contribution to three. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The parcel has been judged to make a strong overall contribution as it supports a strong degree of openness and there are nondurable boundaries between the parcel and the countryside therefore the parcel has a strong role in preventing encroachment into the open countryside. The parcel therefore makes a strong contribution to fulfilling the fundamental aim of the Green Belt under paragraph 79 of the NPPF in protecting the openness of the Green Belt.”	Moderate overall contribution Site 2901 makes a moderate contribution against two purposes and no contribution to three. This smaller parcel is therefore suitable to progress further in the site assessment process.

We trust the above comments on the Green Belt assessment of land parcel LY22 will be taken into account in the more detailed site assessments to be undertaken in the next stage of the plan-making process.

Question 2

Do you consider the assessment of Housing Needs to be appropriate?

The 'objectively assessed need' for 839 new homes per annum, increased to around 1,000 new homes per annum to accommodate the borough's aspirations for economic growth, does not make sufficient adjustment for market signals as required by the third Core Planning Principle in paragraph 17 of the National Planning Policy Framework. This Core Planning Principle states that:

"Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities." (NPPF paragraph 17, 3rd bullet point, my emphasis)

The importance of market signals is elaborated in the National Planning Practice Guidance. This states:

*"The housing need number suggested by household projections (the starting point) **should be adjusted to reflect appropriate market signals**, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand."* (NPPG, paragraph 2a-019, my emphasis).

*"A worsening trend **in any** of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections."* (NPPG, paragraph 2a-020).

To be consistent with the Framework and NPPG, sufficient adjustment must be made for market signals in deriving Warrington Borough Council's housing requirements.

The Mid Mersey SHMA report by GL Hearn examines market signals across the housing market area (HMA) as a whole. The implications of the market signals are summarised on page 138 of the SHMA, which notes that, "*house prices (are) generally stable across the HMA, **growing slightly in Warrington** and remaining constant in St.Helens and Halton.*" The SHMA recognises that the overall picture in the HMA as a whole is different to the more localised picture in each borough council area. This is even more true for local areas, with evidence of 'hotspots' where there is evidence of strong demand, rising prices and reducing availability of housing, for example in Lymm.

It is inadequate to ignore the areas of high market demand, subsuming them within the overall average for the Mid Mersey area as a whole. This approach is highly likely to lead to significant challenge at the Local Plan examination. To avoid the Local Plan getting into difficulty, local market 'hotspots' of high housing demand should be addressed early on in the Plan's preparation.

For example, in Lymm there has been a 42% increase in average house prices between 2006 and 2016. Prices for semi-detached and detached properties now significantly exceed the height of the market boom in 2006/7. To ignore such market indicators is a significant weakness of the SHMA evidence base.

In summary, market signals should be taken into account not only in relation to the overall figure, but also in relation to the distribution of development within the borough council's area. Unless local hotspots are adequately addressed, the assessment of housing needs is not considered appropriate.

Question 3

Do you consider the assessment of Employment Land Needs to be appropriate?

It is disappointing that Warrington Borough Council is planning for *less* economic growth than in its recent history. This does not sit well with the National Planning Policy Framework's focus on planning being a means of delivering growth. It is also at odds with the 'Northern Powerhouse' ambitions of the North West. It would be preferable for the Council to take a more positive approach to economic development.

Question 4

Do you consider the alignment of Housing Needs and Job's Growth to be appropriate?

Agree

Question 5

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

No, the land supply assessment takes an over-optimistic approach to delivery and is not informed by an up-to-date development viability assessment.

The SHLAA study is used uncritically to inform the Council's estimated housing land supply, set out in its Urban Capacity Statement. Experience shows that not all the SHLAA sites will transpire into delivery on the ground. Some will not come forward due to landownership issues, financial viability issues, business continuity issues and a host of other reasons. There is no allowance for the inevitable proportion of sites that do not come forward (a "non-implementation" allowance). Consequently, the Council's estimated land supply is unrealistically high.

The Council's latest published Viability Assessment is dated September 2010, and is now very out-of-date. This should be updated and used to inform deliverability as well as informing the provision of affordable housing in the borough.

In summary, the Council's assessment of Land Supply is considered to be unrealistic.

Question 6

Do you consider that Green Belt land will need to be released to deliver the identified growth?

Agree

Question 7

Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?

Agree

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?

Agree. A longer term perspective is necessary, because the National Planning Policy Framework requires any review of Green Belt boundaries to have, “*regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*” (NPPF paragraph 84).

Consequently this once-in-a-generation Green Belt review needs to consider the release of enough Green Belt land to cater for two plan periods, as neighbouring local planning authorities have done, in order to be consistent with the Framework.

Question 9

Do you consider it appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Local Plan review?

Agree

Question 10

Do you consider the Sustainability Appraisal Scoping Report to be appropriate?

The SA appraisal Framework could be improved in the following ways:

Draft SA appraisal criteria	Comments
Strengthen the local economy and ensure sustainable economic growth	Should recognise that housing in locations that attract suitable workers into the borough will have a positive effect on the economy.
Reduce poverty, deprivation & social exclusion – EC3 how close is the site to key employment sites?	‘Key’ employment sites need to be clearly defined on a map. They should not be confined to manufacturing jobs, but should also encompass service and retail jobs in town centres, supermarkets, etc.
Reduce the need to travel, especially by car, improve choice and the use of more sustainable modes - ACC4: How accessible is the site to the nearest train station?	This criteria is biased to areas with a railway station. It could be widened to accessibility to the nearest train station <i>or cycleway</i> , or alternatively dropped altogether.
Natural Resource – NR3 loss of high quality agricultural land	The criteria are unclear for sites of 10-20 hectares of grade 3b land.

Question 11

Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?

Agree.

Question 12

Do you agree with the assessment of Local Plan Policies at Appendix 1?

Agree.

Question 13

Do you consider the proposed 20 year Local Plan period to be appropriate?

A 20-year period is appropriate *provided* it includes enough release of Green Belt land to provide sufficient land for at least 2 plan periods – ie 40 years.

This is necessary to be consistent with the National Planning Policy Framework, which states: *“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”* (NPPF paragraph 83)

The Local Plan can only be found ‘sound’ if it provides certainty for the long-term Green Belt boundaries, which should only be reviewed once in a generation. Consequently the Local Plan needs to release from the Green Belt sufficient land to be ‘safeguarded’ for future development needs up to 2057.

Question 14

Having read this document, is there anything else you feel we should include within the ‘Preferred Option’ consultation draft, which you will be able to comment on at the next stage of consultation?

Further to the above comment, the Preferred Option consultation draft needs to include land to be removed from the Green Belt and ‘safeguarded’ for future development needs beyond the plan period.