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# Warrington Borough Council

## Local Plan Review

### Regulation 18 Consultation: Standard Response Form

October 2016

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## 1: Contact Details (Compulsory)

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## **2: Questions**

### **Question 1**

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

### **Question 2**

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

### **Question 3**

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

### **Question 4**

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

### **Question 5**

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

### **Question 6**

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

### **Question 7**

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

### **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?**

### **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?**

### **Question 10**

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

### **Question 11**

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

### **Question 12**

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

### **Question 13**

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

### **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?**

### 3: Responses

#### Question 1

Whilst the Local Plan Review link on the website sets out the current evidence base that includes:

- Green Belt Assessment - Main Report & Appendices - October 2016
- Green Belt Assessment - Appendix F Parcel Plans - October 2016
- Economic Development Needs Assessment - October 2016
- Review of Economic Forecasts and Housing Numbers
- Urban Capacity Statement - October 2016
- Mid Mersey Strategic Housing Market Assessment (SHMA) - Addendum for Warrington
- Annual Monitoring Report 2015/2016

There is also the link on the Planning Policy page to Evidence Base which includes more detailed pages of Evidence that is not readily available on the Local Plan Review page and could be overlooked.

The more detailed comments on each report is covered in the subsequent questions. However, the lack of any evidence in respect of Highways Infrastructure. Many of the strategic planning issues that are being addressed by the Council for the development of the Borough cannot be fully assessed without evidence on the infrastructure capacity.

It is understood that the Council is currently developing a traffic model to test the Local Plan Core Strategy and the associated transport interventions required to support its delivery. This is crucial to allow the proper and sound evaluation of the all the key development options.

The detailed information on the Community Infrastructure Levy (CIL) would be of assistance at this stage to enable a strategic assessment of viability to be made. It is understood that it is the intention for this to run in parallel with the review of the Local Plan. We would suggest that this an integral part of the evidence base and should be published as soon as possible.

The Local Development Scheme (LDS also highlights the Duty to Co-operate, as introduced by the 2011 Localism Act. It would aid the regional and sub-regional placement of the Plan if there was clear and direct links to adjoin Local Plans and more importantly strategic documents such as the Greater Manchester Spatial Framework (GMSF) and the NHS plan.

It is also important to consider Warrington Means Business which sets the Council's programme to drive economic growth and development in the Borough. The Warrington Local Plan Core Strategy sets policy context to this work so it is important that this is assessed along with the emerging g Local Plan.

As part of the Local Plan Review, Mickledore were commissioned to look at alternative forecasts for both housing and employment land. This is a short document that begins to examine the alternative scenarios and this is important it does not examine the Greater Manchester Spatial Framework and its potential effect on Warrington. The GMSF includes a substantial Evidence Base that needs to be assessed to ensure that the Duty to Co-operate is adequately addressed, especially due to Warrington's strategic location. The same is true of the Merseyside Combined Authorities, which has produced Building our Future: Liverpool City Region Growth Strategy document and although not as coherent as the Greater Manchester framework provides a massive Evidence Base that needs to be adequately considered

## Question 2

### Strategic Housing Land Availability Assessment (SHLAA)

As stated the purpose of a Strategic Housing Land Availability Assessment (SHLAA) is to identify and evaluate the potential of land for future housing development, to ensure that the delivery targets in the Local Plan are continued to be met. This is reviewed on an annual basis. Each review presents an opportunity for additional sites to be considered and the methodology and approach to the assessment to be revisited.

In terms of whether this is appropriate, it is noted that there is a distinct disconnect between the SHLAA and the Green Belt Assessment. Sites identified and assessed in the SHLAA and are not fully recognised within the Green Belt Parcel Plans. This begins to question the validity of the Green Belt Study and the whether the assessment has been rigorous enough at this stage. There needs to be a more detailed assessment to allow all the sites identified in the SHLAA to be objectively assessed in light of all the other evidence being published.

### Strategic Housing Land Availability Assessment (SHLAA) 2016 - Headline Findings

Clearly the headline findings from Warrington's housing monitoring for 2016 can be found in the latest Annual Monitoring Report (2015/2016). The findings have been expanded to include the potential capacity of sites across the borough to accommodate new homes over the next 15 years, in addition to the borough's 5 year housing land supply. Wallace Land Investments (Wallace) agree that it does not represent a comprehensive update of the SHLAA like what was undertaken in 2015 it provides an up to date position regarding the borough's housing land supply position. It is therefore essential the in the latest Call for Sites that the information gathered in the SHLAA update is carefully assessed before helping to shape the direction of the emerging plan during the next stages.

### Urban Capacity Statement 2016

The need to establish and objectively assess the additional capacity to accommodate growth in the existing urban area and on green field sites outside of the Green Belt has been carried out in the Urban Capacity Study. This adequately takes into account the SHLAA and the various masterplanning work undertaken by the Borough Council and an allowance for windfalls

### Mid Mersey Strategic Housing Market Assessment (SHMA) 2016

The Council has been working in partnership with Halton and St Helens Councils, and commissioned GL Hearn to prepare a Strategic Housing Market Assessment (SHMA). The SHMA identifies the Objectively Assessed Need for housing as well as considering the need for different types of housing and the housing needs of different groups within the community.

There are clearly a complex set of relationships across the Mid-Mersey area and we agree that although the authorities have a relatively strong relationship, Warrington has its own distinct trends such as higher house prices to the east of the borough. It is important to recognise that Warrington and in particular the east of the Borough is likely to have quite a strong relationship to the HMAs to the east which are focussed on Manchester.

Wallace feel that using the mid-point assumption that shows population growth (and hence housing need) is very conservative and this needs to be seen as the starting point before factoring in the growth aspirations of Warrington in terms of the New City, and the needs of the wider Sub Region and NW Region . The figure does not take into account affordable housing need, or include adjustments to take account of market signals or the needs for the local economy. In such circumstances there may well be a higher need still in the HMA. It must be stressed that this figure should only be the starting point and needs to be tested against the identified land supply, infrastructure capacity, environmental constraints, improved affordability and market signals.

### **Question 3**

Warrington Borough Council commissioned BE Group to undertake an Economic Development Needs Assessment in 2016. We agree that it provides a robust evidence base which also reviews the economic performance of the Borough and helps to inform decisions on current and future land allocations in the emerging Local Plan Review.

Again this should not be used in isolation and needs to be assessed in light of other evidence such as the

- Economic Development Needs Assessment 2016
- A Review of Economic Forecasts and Housing Numbers 2016
- Employment Land Availability Statement 2014 – Wallace suggest that this needs to be brought up to date (2016) quickly to reflect the current situation in a single document rather than relying on the latest figures for employment land monitoring in both the 2015/16 Annual Monitoring Report and the Economic Development Needs Assessment 2016.

The same is true about the Warrington Employment Land Review which is now four years out of date (2012) and as stated it forms an important part of the evidence base of the council's Local Planning Framework. The Employment Land Review enables employment land uses to be balanced against alternative needs and it needs to present the current situation, which in the case of a successful economy is crucial as it has a profound effect on the need for new housing.



## Question 4

Based on the Council's growth aspirations set out in the 'Warrington Means Business' economic development programme as well as the Local Enterprise Partnership's (LEP) Strategic Economic Plan and future growth ambitions, it is expected that this will deliver 31,000 new jobs in Warrington up to 2040 which is approximately 30% above the baseline forecasts.

The SHMA was based on a baseline forecast of employment growth, and in order to ensure the correct alignment of housing and jobs it is essential that the housing need figure is reassessed to ensure it is in line. At this stage we feel that the proposed minimum supply of homes to around 1,000 per annum is a cautious figure and will need to be increased to take into account the emerging growth aspirations and predictions for Greater Manchester and Liverpool City Region.

It is encouraging to note that the Council recognises that it will need to be refined ahead of confirmation of the preferred development option to reflect more recent demographic population and household projections which have been released following publication of the SHMA.

## Question 5

The Council has relied on the Strategic Housing Land Availability Assessment (SHLAA) (2016) and this has been updated to provide a figure for the additional anticipated supply up to 20 years and an updated assessment of windfall allowance. This identifies a total housing land supply in the urban area and on green field sites outside of the Green Belt of approximately 11,500. This, as stated previously needs to be seen as the starting point, and together with the various masterplanning exercises and growth aspirations it will need to be re-assessed upwards to accurately reflect the needs.

Wallace agrees that having explored all potential sources of additional land supply, the Council is unable to accommodate all of its development needs within the existing urban area and on green field sites outside of the Green Belt. If Warrington is to meet its development needs, then based on the evidence base and the extra assessments proposed in the previous question, we believe that sufficient Green Belt land will need to be released to deliver enough home homes and employment land over the next 20 years, and the figure proposed by the Council are at this stage the minimum.

Wallace agrees that the Council will need to review its assessment of urban capacity and build in assumptions from the Green Belt Study ahead of confirmation of the preferred development option to take into account any additional sites within the urban area submitted as part of the 'call of sites' process.

## Question 6

The evidence so far gathered by the Council is suggesting Warrington cannot meet its development needs within the existing urban area, as part of its evidence base the Council commissioned Arups consultants to carry out an assessment of the Borough's Green Belt against the 5 purposes the Green Belt serves, as set out in the National Planning Policy Framework (NPPF).

Much of the land to the south of the built up area of Warrington is owned by the Homes and Communities Agency (HCA) and the land already has the benefit of Section 7(1) consent under the New Towns Act, which essentially means that it has the benefit of Outline Planning Consent.

There are key infrastructure gaps however, and in order to meet all the growth aspirations of the Council and the completion of the New Town to provide a new city all the land to the south of the town up to the M56 needs to be assessed in great detail. The land at Stretton being presented in this document by Wallace provides the essential missing piece to the jigsaw that will allow the strategic aspirations of the Borough to be fully realised.

In looking at the more detailed parcel assessment (WR47) the consultant has assessed the site adjoining the area as weak in terms of purposes 1,2,3,4 and moderate when assessing purpose 5.

The proposal will contribute to enhancing the sustainability of the local area by providing a range of homes and employment opportunities. This will strengthen the local economy with community benefits as well as supporting local facilities such as the Royal Park Hotel and the Stretton Fox pub.

## **Question 7**

Wallace agrees that the three strategic matters are appropriate but would stress that this is the initial focus of the Review and as it progresses towards Examination and ultimate adoption then this will need to be reviewed again.

## Question 8

Wallace strongly agrees that further land will need to be removed and have submitted the site adjacent to Junction 10 as being a key site in the strategic development of the Borough. The site's strategic location and its important role within the original New Town Plan is key to the success of the emerging Garden City proposal submitted to Government. The strategic infrastructure highlighted above needs to be assessed together with the assessment of the site in terms of the contribution to Green Belt purposes examined by Arup in their study.

The Arup study looks at the contribution to Green Belt in four categories;

- No contribution;
- Weak contribution;
- Moderate contribution;
- Strong contribution.

This is then related to the five Green Belt purposes, namely:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns from merging into one another;
- To assist in safeguarding the countryside from encroachment;
- Preserving the setting and special character of historic towns;
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The site at Stretton being presented by Wallace is included in Area 10 as part of the General Assessment as indicated on the Map in Appendix D. This assesses the area as having a weak contribution to the Green Belt assessed against the five purposes of Green Belt. A more detailed comment on the Stretton site is made in the section on land parcels (pH35). It is highlighted as WR47 and the first comment to make is that it is surprising that not all the site included as highlighted on page 1 of this document and as it was presented to the council in 2015 as part of the SHLAA call for sites.

The General assessment is clear on page 46 (table 9) that the area is assessed as having a weak contribution to Green Belt and Wallace agrees with this assessment that it is well connected to the built up area and that it represents a rounding off of the settlement pattern, performs a weak contribution to openness with non-durable boundaries which would not prevent encroachment and it does not prevent towns from merging. Wallace are concerned that the detailed parcel assessment WR47 only includes a small element of the area and the rationale for the inclusion of the full area is set out on page 8 of the CALL for Sites Submission.

Wallace agrees with this general assessment and in looking at the more detailed parcel assessment (WR47), the consultants have assessed the site adjoining this site as weak in terms of purposes 1,2,3,4 and moderate when assessing purpose 5. Wallace feels strongly that the assessment for this parcel must include the area as defined by the red line boundary on page 1 of this document. The General Assessment by Arups has already identified the area as being "weak" and the Stretton site meets all of the Council's long term objectives for the future New City and together with the HCA sites immediately adjoining the site helps to deliver a high sustainable extension to the town and essential infrastructure improvement to help meet the strategic objectives of the authority.

## Question 9

No Comment

## **Question 10**

Yes at this stage Wallace agrees but also stress that it needs to be flexible and address all the aspects of sustainability and not the usual focus on transportation as the only controlling element

## Question 11

Yes



## **Question 12**

Yes although this will need to be reassessed as the plan progresses as proposed changes to a policy will potentially have an impact on another policy. It will also need to reflect any changes in national Planning policy and legislation. The Plan needs to be read as a whole and not policies in isolation

### **Question 13**

Yes but the time period will need to be reassessed as the plan progresses and in light of any delays in the process

## Question 14

At this stage in the process Wallace recognises the Scope and Content document but will reserve comment on the as the Preferred Option consultation Draft emerges subject to the commetns already set out above.