



Overarching Representations to the Warrington Local Plan Review – Regulation 18 Consultation – September 2017

For: Various clients

17-316



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Warrington
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1. Introduction

- 1.1 Emery Planning is instructed by a number of clients to prepare representations to the consultation on the Preferred Development Option Regulation 18 document published in July 2017. Site-specific representations are made separately to this report, which focuses on the Regulation 18 consultation document only.

Executive Summary

- 1.2 This report sets out representations made on behalf of a number of clients with land interests in the borough to the methodology of the Regulation 18 consultation currently being conducted by Warrington Borough Council. These clients are promoting a number of sites across the borough for residential and commercial development, including draft allocation sites and omission sites. Site specific representations are submitted under separate cover.
- 1.3 The undertaking of a local plan to align household growth and employment needs across the borough is welcomed, and represents an important opportunity to address the housing crisis in Warrington and facilitate much needed economic growth.
- 1.4 We particularly welcome the acknowledgement that Green Belt boundaries need to be amended in order to meet the objectively assessed needs of the borough. We also support the principle of allocating large strategic sites that can deliver significant new homes and infrastructure. However, we consider that additional sites should be allocated to complement the draft allocations, including the provision of smaller sites that can be delivered in order to add required flexibility to the housing supply to maintain a 5 year supply of housing land.
- 1.5 In light of the above, we consider that the preferred option as set out by the authority has a number of critical failings:
- The overall housing requirement over the plan period is too low. This is supported by a number of factors, including the proposal to align housing growth with historic job growth trends, and the need to address adverse market signals.
 - Insufficient land has been identified in the short term, and overall, to meet the identified requirement (let alone a higher figure).

- There is a reliance on large scale strategic sites, with lead in times that will be significant, and consequently the anticipated build rates to deliver in full during the plan period are not realistic.
- The plan has insufficient flexibility to respond to change, for example the non-delivery of strategic sites in part or full. In the absence of such flexibility, there is a real risk that the borough will not be able to demonstrate a sufficient supply of housing land.
- There is insufficient provision of safeguarded land.

1.6 We therefore recommend the following key changes are made and reflected in the submission version of the plan:

- The housing requirement needs to be increased from 1,113 dwellings per annum to a minimum of 1,332 per annum, to reflect the evidence base and the ambitions of the region.
- The supply of housing land should be increased and diversified through the addition of deliverable sites, which are not burdened by significant infrastructure requirements.
- A significant amount of additional safeguarded land should be identified to meet development needs post 2037.

1.7 We consider that these changes are necessary to make the plan sound, and to align it with the economic ambitions of the borough.

1.8 The following sections set out our objections and concerns in relation to each relevant policy.

2. National Planning Policy

2.1 Paragraph 182 sets out the tests of soundness against which the revised Warrington Borough Local Plan will be examined by an independent Inspector:

- *Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
- *Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- *Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
- *Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

2.2 In addition to the tests of soundness, the plan must be prepared in accordance with the Duty to Cooperate, legal and procedural requirements.

2.3 Footnote 11 of the NPPF states:

"To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans."

Planning Practice Guidance (PPG)

2.4 The PPG was published in March 2014. It contains guidance on housing and economic land availability assessments at section 3. Of relevance to the current consultation is paragraph 3-031, which states:

“Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply” (our emphasis)

3. Consultation administration

- 3.1 We make comments on the consultation administration in the first instance. The plans provided as part of the package of online documents are of a poor quality and extremely low resolution. This has led to ambiguity at best and potentially misrepresentation in establishing the extent of proposed allocations as well as the proposed uses within them. For example, it is unclear what is proposed to happen to the sliver of Green Belt that would remain to the north of Grappenhall in the event of the Garden City Suburb being allocated.
- 3.2 Furthermore, it has become apparent late in consultation process that the plans provided online were of a lower standard and to a certain extent different to those provided at the drop-in sessions at various locations throughout the borough. Numerous requests were made for higher resolution plans, but none have been provided by the authority. This is contrary to guidance set out in NPPG paragraph 010 (Reference ID: 12-010-20140306) which states that:

“Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions).

The policies map should illustrate geographically the policies in the Local Plan and be reproduced from, or based on, an Ordnance Survey map.”

- 3.3 Clearly, the discrepancy between the plans available online and those available at consultation events is contrary to the above. This submission is therefore made following a review of the best information available to us but in the context that the consultation has not been carried out on the basis that sufficient detail has been available to all, especially those not able to attend the drop in sessions

4. Response to consultation questions

- 4.1 This section of the statement addresses the questions as set out in the Regulation 18 Standard Response Form. Each relevant question is addressed below, and some are answered as part of other responses due to the inevitable overlapping of the issues.

Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

- 4.2 Yes. Concerns raised at the previous Regulation 18 consultation in December 2016 remain. Whilst we welcome the uplift in the housing numbers from 984 to 1,113 per annum, it is still considered to be insufficient to address the housing need identified in the updated SHMA assessment (June 2017) which states that there would be a requirement for 1,332 homes per annum should historic levels of job growth be maintained over the plan period.
- 4.3 It is considered that the figure of 1,332 should be a minimum figure, particularly in the context of this being an aspirational plan that is planning for growth, in line with requirements set out in national policy. The 1,332 figure is based on data gathered during a time period that includes the worst and most protracted recession in post-war history. It is a figure that looks backwards rather than forwards.
- 4.4 The SHMA Addendum document published in May 2017 states that:

"This report does not seek to estimate the future economic growth potential in the HMA. Instead we have drawn on economic forecasts set out in the Council's "review of economic forecasts and housing numbers" prepared by Mickledore in October 2016 and including work undertaken by the LEP in estimating their Devolution deal and finally by SQW and CE in their "The Northern Powerhouse Independent Economic Review" paper from June 2016."

- 4.5 Concerns were raised in the last consultation in December 2016 that the chosen jobs growth figure is extremely conservative. The Review of Economic Forecasts and Housing paper SHMA by Mickledor provides information on how the projected employment growth figure of 27,280 as identified in the preferred Devolution Deal policy trend, has been reached. If past trend data between 1992 and 2014 continues throughout the plan period, it indicates an increase of 36,175 jobs between 2016 and 2037. Considering that past data is inclusive of the worst economic recession since records began, it is unrealistic to expect future growth to be below past trends.
- 4.6 We note that the Economic and Development Needs Study considers different scenarios to establish the OAN for employment land. The report considers the amount of land required to meet the jobs growth projected from the Devolution Bid, but discounts this approach in favour of projecting forward past take-up rates.
- 4.7 However, the market assessment and a review of the historic trends in employment change and land take up (see Section 8.0) suggest that these forecasts underestimate land needs significantly. The preferred forecasting method is therefore a projection forward of past take-up rates that considers both strategic and local needs.
- 4.8 It is therefore apparent that the Economic and Development Needs Study considers that land for significantly more than 31,000 jobs needs to be provided in Warrington.
- 4.9 Notwithstanding, even if the Devolution Bid is accepted as the basis for determining the OAN, it is apparent that Warrington has significantly outperformed other parts of the region in terms of delivering employment land and job growth. This reflects the strategically significant location of Warrington, in particular having regard to its connections to the M6, M56 and M62. This adds further weight to the trend based growth figures, which in our view could actually be exceeded through the Devolution Bid and Northern Powerhouse projects.
- 4.10 The Northern Powerhouse job growth figure put forward in the Mickledor report is plainly not realistic, and the Council has acknowledged this by uplifting the housing requirement from 994 to 1,113 dwellings per annum. The increase in job growth suggested in the Northern Powerhouse Independent Economic Review was for the entire Northern Powerhouse area, and had been taken completely out of context in applying that figure for Warrington. However, the reality is that despite the context of the Northern Powerhouse, Warrington is still seeking a jobs growth figure substantially lower than past trends.

4.11 The SHMA Addendum (May 2017) conducted by Mickledore states that:

"It is for the Council to consider if it wishes to plan for higher employment growth. If it does so it needs to balance this with provision of additional housing. 1,113 dpa would be required to support the Devolution Deal economic ambitions."

4.12 As set out above and in previous representations, the Devolution Deal economic ambitions are not sufficient to meet future needs based on past trends (which includes the worst economic recession since records began). Consequently, the revised housing target of 1,113 dwellings per annum would not deliver the sufficient minimum levels of housing to meet future economic needs. This does not reflect the Council's stated "significant ambitions for economic growth" and represents a suppression of delivery, contrary to the aims and objectives of national planning policy.

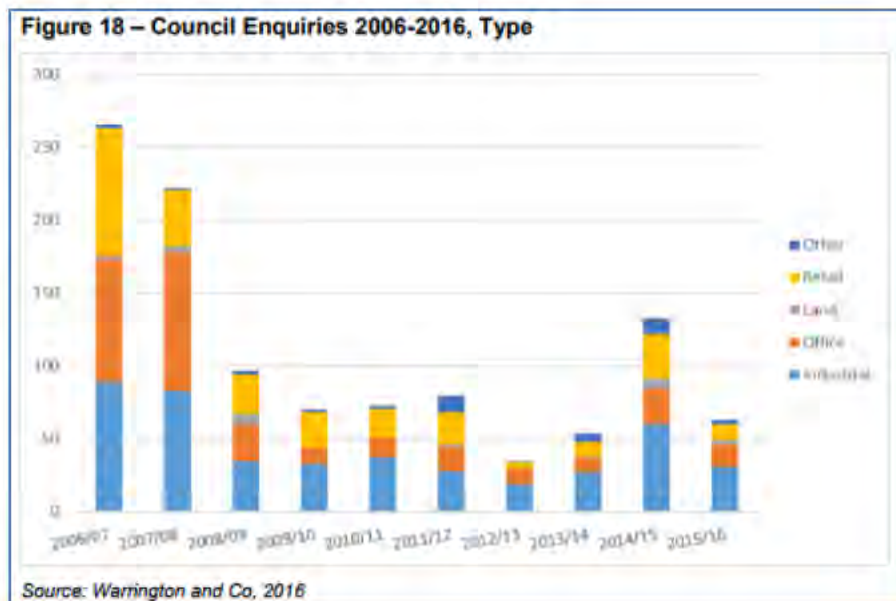
4.13 The authority sets out its justification for not basing future growth on past trends in the preferred options (paragraph 2.17) document as follows:

"The Council does not agree that continuing past trends is the most robust basis for forecasting jobs growth in Warrington. The borough has undoubtedly experienced a very high rate of jobs growth over the last 20 years, partly as a legacy from its New Town status. Whilst the Council is confident that Warrington will continue to be one of the strongest performing economies in the North West, the predominant growth sector in terms of land for new development is within the distribution sector which has a relative low level of job creation in comparison with other sectors."

4.14 The Economic and Development Needs Study conducted by Mickledore in October 2016 is clear that the recession had a significant impact on employment growth, stating in their assessment of local property market enquiries (paragraph 4.5) that:

"From a peak in 2006/07, enquiries drop sharply from 2008/09 onwards. While the scale of the drop may partly be accounted for by changes in how enquiries are collected and recorded by the Council, the impact of the national recession on industrial and office demand, is still in evidence. Enquiries remained low for all types of property over the recessionary period and reducing to only 35 in 2012/13"

4.15 This is demonstrated in the table at Figure 18 of the report:



4.16 Whilst it is accepted that Warrington's 'New Town' legacy has protected the borough to a certain extent, there is no denying that the economic recession had a significant negative effect on economic growth; and was unprecedented in its impact and duration. This data must be taken into consideration, and projections based on past trends that include this economic recession must be used as an absolute minimum aspiration for future economic growth.

4.17 The Council goes on to state in paragraph 2.18 of the preferred options document that:

"It is also apparent that if the Council was to further uplift its jobs growth figure, then this could result in objections from neighbouring authorities. During 'Duty to Cooperate' discussions, a number of authorities expressed concern that higher levels of job growth in Warrington could undermine their own growth potential and / or risk promoting unsustainable commuting patterns."

4.18 No evidence has been put forward in support of these concerns. We consider that planning for a higher rate of employment growth is founded in the evidence base, and is necessary for Warrington to meet its own needs.

4.19 Consequently, it is considered that the Council's justification for disregarding past historic trends is not sufficient. We welcome the Council's acknowledgement that it is appropriate to test the impacts of higher and lower job growth rates as 'reasonable alternatives', and we recommend that the data is reconsidered and the housing target is uplifted to 1,332 as a minimum target.

The Council should not submit a plan that would suppress economic growth and the delivery of much needed housing, contrary to the aims and objectives clearly defined in national planning policy and guidance.

Market signals

- 4.20 The PPG states that household projections should be adjusted in order to reflect appropriate market signals and highlights six indicators relating to land prices, house prices, rents, affordability, rate of development and overcrowding:

*"A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections."
[ID:2a-020-20140306].*

- 4.21 The evidence available is compelling in illustrating the affordability issues in Warrington. Paragraph 4.18 of the SHMA addendum assesses housing affordability over the past 15 years. It confirms that:

"the fifteen year change shows a growth in the affordability ratio across all authorities with Warrington in particular worsening"

- 4.22 Adjustment to the household projections is required in accordance with the PPG, which advises that worsening trends in any of the referenced indicators justifies a housing uplift. Simply planning housing provision against the Devolution deal requirement is almost certain to result in worsening affordability, rather than improving the situation. Furthermore, the Devolution deal requirement is lower than the projected rate based on past trends, which includes the worst and most protracted economic recession since records began. This will also almost certainly have a negative impact on affordability.

- 4.23 The SHMA addendum does not consider an increase in future household formation rates in Warrington. Such rates have been suppressed in Warrington, where there has been a combination of under-delivery of housing and severe affordability issues. For Warrington to perform well economically, it should encourage higher household formation rates; particularly for people of working age. This could be achieved by providing an uplift to 1,332 dwellings per annum as a minimum target for delivery.

Affordable housing need

- 4.24 As the Council will be aware, the Satnam Judgment established that the Council had failed to properly have regard to meeting affordable housing need. This is a key issue for Warrington which the Local Plan should address.
- 4.25 One of the key reasons why the affordable housing need identified through the latest SHMA (288 per annum) is lower than previous iterations put before the previous Local Plan examination (477 per annum) is that the SHMA applies a higher threshold of income to accommodation cost than the CLG Guidance. The reasons for this are likely to be self-fulfilling; for example households have little choice but to spend more on their accommodation if they do not have access to affordable housing (delivery in Warrington has been substantially below identified need). It is also important to note that the need identified is based on a continuation of real households and families contending with spending far too much (40% of income is the figure applied in the SHMA) on their living accommodation. It is critical that the housing requirement is uplifted to try and address these issues.
- 4.26 Furthermore, the methodology employed in the SHMA it emphasises that the affordable housing need figure is a minimum, and should be met in full. We consider that based on the current requirement (1,113 dwellings per annum) and supply identified by the Council, which relies heavily upon SHLAA sites from within the urban area which are unlikely to deliver high levels of affordable housing, the identified affordable housing need would not be met.

Conclusions on the proposed housing requirement

- 4.27 The proposed requirement of 1,113 dwellings per annum would not align with jobs growth and economic aspirations. It would also fail to address issues of affordability, previous under supply of housing, and the need for affordable housing which was the key issue in the Satnam Judgment. We consider that the requirement should be uplifted, and that the identified scenario of 1,332 dwellings per annum would be more appropriate.

Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?

- 4.28 Yes.

- 4.29 The Council has identified a total capacity from the urban area of 15,429 dwellings. We consider that the Council's expectations from this source are not realistic.
- 4.30 The Urban Capacity Assessment assumes that all SHLAA sites within the existing urban area will come forward during the plan period. However, there will inevitably be issues with delivering all the identified land in the built up area of Warrington, particularly in terms of viability, ownership and other uses which already exist on the identified land. The Urban Capacity Assessment also makes unrealistic delivery assumptions in relation to the town centre and Inner Warrington ('Masterplanning Land Supply'). The Council does not appear to have had regard to past performance from these sources. Previous reliance upon these sources, and subsequent failures in delivery, has resulted in identified housing needs in Warrington not being met over a prolonged period of time.
- 4.31 Furthermore, the authority is depending on all the identified brownfield land coming forward to maintain what we consider to be a suppressed annual housing target.
- 4.32 We therefore consider that additional deliverable site allocations are required, to increase and add flexibility to the housing land supply.

Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

- 4.33 No.

Land to be allocated for development

- 4.34 As set out elsewhere within these representations, there are a number of reasons why additional land needs to be released from the Green Belt and allocated for development during the plan period:
- As set out above, it is considered that the proposed housing requirement of 1,113 is too low.
 - The Council has over-estimated the supply of housing land from the existing urban area.
 - The proposed distribution of development is highly concentrated within the four proposed strategic allocations. The projected lead-in times and build rates as relied

upon by the authority are unrealistic, and the strategic allocations are very unlikely to deliver at the anticipated rates.

- 4.35 The authority must therefore consider further Green Belt release to provide sufficient housing and employment land.
- 4.36 We also consider that the proposed flexibility allowance of 5% is not sufficient. Having regard to past delivery rates in Warrington and the consistent failure to meet housing requirements, we consider that a flexibility allowance of at least 20% should be built into the Local Plan. This approach would give a reasonable degree of security that should sites not deliver at the rates anticipated, a 5 year housing land supply could still be maintained.
- 4.37 The Local Plans Expert Group has strongly advocated providing a high degree of flexibility in the supply of housing land. The group published its report to the Communities Secretary and the Minister of Housing and Planning in March 2016. Although the conclusions of the report have not yet been brought forward into national policy, they nevertheless highlight a number of common failings in plan-making that often result in recently adopted plans being found to be 'out-of-date' not long after adoption. Paragraph 11.2 of the report identifies that particular problems currently occur with identifying and maintaining a five year supply of housing land, not least because:
- i. the factors affecting a five year land supply calculation are 'live', in the sense that matters such as build rates, site circumstances etc. change constantly so that, whatever a Local Plan Inspector finds as a result of the local plan examination will be out of date even before the local plan is adopted;
 - ii. even though local plan examinations are often dominated by five year supply issues, they rarely have the time to address the full detail properly and there are several examples of appeals being won on the five year issue immediately after a local plan has been adopted because further scrutiny is possible through section 78 appeals;
 - iii. even where a local plan has recently been found sound – with a housing requirement that meets OAN – the subsequent publication of new household projections or other data is being cited by developers and others as reason to argue that the plan is out of date;

- iv. because plans tend only to allocate the minimum amount of land they consider necessary, once adopted, there is little that local plans can do to address any shortages that appear in the five year supply. Any shortages, therefore, trigger (slow) local plan reviews meaning that shortfalls tend to be addressed by application or appeal led solutions, rather than plan-led solutions; and
- v. the combination of short term focus, coupled with inevitable long term shortcomings, then encourages the concept of plans being found sound subject to early reviews, which undermines the credibility and sustainability of the plan-led system.

4.38 One of the report's recommendations (paragraph 11.4) is that local plans should not only demonstrate a five year land supply, but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable reserve sites equivalent to 20% of their housing requirement. In the case of Warrington, where the requirement should be a minimum, there is no specific need for reserve sites, providing that sufficient flexibility is built into the housing supply; at present it is not.

4.39 At present the recommendations of the Group are just that; recommendations. However their conclusions reflect the concerns that we have in respect of the Warrington Local Plan. We consider that there is insufficient flexibility to deal with changing circumstances, specifically a failure to deliver housing at the anticipated rates. There are also no reserve or backup sites proposed. Consequently, the reality is that any slippage from the allocated or committed sites could result in the housing requirement not being met.

4.40 The proposed 5% flexibility allowance is also inappropriate in the context of 4 strategic sites accounting for approximately 5,148 of the proposed 9,261 dwellings (equating to 56%) expected to come forward during years 6 to 10 of the plan period. Slippage from any one of these sites would almost certainly result in the plan failing to meet the identified housing and employment land requirements.

4.41 It is therefore recommended that the flexibility allowance should be increased to at least 20% so that the council can meet the OAN and adapt to rapid change as it is required to do under paragraph 14 of the Framework.

Safeguarded land

- 4.42 Turning to the amount of safeguarded land proposed, paragraph 83 of the Framework requires that when Green Belt boundaries are established or reviewed, 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.
- 4.43 Paragraph 85 states that when defining boundaries, local planning authorities should where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. They should also satisfy themselves that Green Belt boundaries will not need to be reviewed at the end of the plan period.
- 4.44 Therefore national policy is clear on the need to provide for safeguarded land. In Warrington, it is clear that the borough will continue to be a focus for development, and it is therefore critical that sufficient safeguarded land is provided to meet needs stretching well beyond the period.
- 4.45 The Council proposes to designate safeguarded land sufficient to accommodate only 9 years' worth of housing land based on the current OAN, and just 5 years' worth of employment land based on the current requirement. We consider this to be wholly insufficient.
- 4.46 How much safeguarded land is needed in practice was considered in detail at the Cheshire East Local Plan examination, which has now been adopted. In summary, sufficient safeguarded land should be provided to ensure that the current requirement could be carried forward to the next plan period (i.e. 2037 to 2057 - 20 years) without the need for Green Belt release. In practice the minimum requirement is to provide a similar amount of safeguarded land to the amount of Green Belt being released for development in this plan period. Ideally more should be provided, to allow flexibility for higher growth to increase the permanence of the Green Belt and to reflect the fact that the plan currently looks to maximise the use of sites outside the Green Belt in this period; therefore it will not be available in the next plan period.
- 4.47 In addition to the period of time planned for, we have a number of very significant concerns in relation to how the quantum of safeguarded land has been arrived at in effect the latter point in the paragraph above. The plan relies on developing all available urban land not in the Green Belt as a crucial part of the housing and employment land supply for the plan period. We have commented that this is not realistic. In calculating the amount of safeguarded land

required, the Council assumes that a similar quantum of urban capacity would arise for the next plan period. Although it is entirely reasonable to assume that some additional urban capacity will arise before the beginning of the next plan period, the Council's current assumptions are wholly unrealistic.

- 4.48 The Preferred Options document sets out in paragraph 5.37 that the total proposed safeguarded land amounts to 'General Area 9' as identified in the Green Belt Assessment conducted in 2016, which is land adjacent to the proposed 'Garden City Suburb'. Notwithstanding our view that the overall quantum of safeguarded land is insufficient, we are concerned that the allocation of only one site as safeguarded land would not provide the required future flexibility, both in terms of the risk of the site not being available when needed, and the locational needs for future development.
- 4.49 We therefore consider that the authority should identify a range of sites throughout the borough to be safeguarded for future development, to meet needs beyond 2037.

Do you agree with the new Local Plan Objectives?

- 4.50 We broadly agree with the authority's acknowledgement that a significant amount of housing and employment land must be allocated for the plan to be successful. However, Outlying Settlements have not been considered in the strategic objectives of the plan. Whilst we broadly agree with the objectives, due consideration must be paid to these settlements, as they are significant in size and the economic contribution they make to the borough as a whole is not insignificant. There are also particular planning issues in these areas which should be addressed through the plan, such as affordable housing need.

Do you agree with our Preferred Development Option for meeting Warrington's future development needs?

- 4.51 The preferred development option as set out by the authority is option 2. Whilst we would support the broad aim of delivering housing and employment land, we do not consider the preferred option to be sufficient in its current form to meet the development needs of the borough.

Do you have any comments to make about our Preferred Development Options?

- 4.52 Whilst we support the principle of allocating land for employment and residential development, we have serious concerns about the delivery of these sites in the timeframes proposed by the

authority; particularly in the context of significant identified policy, infrastructure and masterplanning requirements.

Lead-in times and build rates on the proposed strategic sites

4.53 Paragraph 3-031 of the PPG explains that plan makers will need to consider the time it will take to commence development on site and build out rates.

4.54 In terms of build rates, we note that the Council's trajectory assumes an extremely high delivery rate of dwellings per annum for the proposed allocations. The Council will need to evidence why this build rate has been applied. As set out in paragraph 3-033 of the PPG, we would expect the Council to have assessed the local delivery record and explain why it assumes this build rate could be applied to all sites.

4.55 We accept that a higher build rate could be achieved on very large sites with multiple developers. However, the Council will need to evidence that there will be more than one developer on site at the same time. For those sites without planning permission in particular (which accounts for most of the allocations), the Council will need to demonstrate why it assumes there will be two developers (or more) on site at the same time and when this is expected to happen. It may be that a single developer is on site from the outset before others and this again should be reflected in the delivery forecasts.

4.56 In terms of lead-in times, the Council will need to consider on a site by site basis:

- how long a planning application will take to prepare, submit and be determined (if the site does not already have planning permission);
- how long it will take for the S106 agreement to be negotiated and agreed;
- whether an allowance needs to be made for the site to be sold to a developer / housebuilder;
- how long it will take for applications for reserved matters and discharge of conditions to be made, considered and approved;
- whether there is infrastructure that needs to be put in place before the site can start delivering dwellings and how long this will take; and

- whether there are any other site-specific considerations which would affect a start on site.

4.57 The lead-in times are particularly important for the larger allocations, which by their nature will have a range of issues to be addressed through applications and will need sufficient time for S106 agreements to be agreed, a start on site to be made and infrastructure put in place before dwellings will be delivered.

4.58 Evidence from research undertaken by Nathaniel Lichfield & Partners published in November 2016 ('Start to Finish - How quickly do large-scale housing sites deliver?') highlights that the average lead-in time for large sites (above 500 dwellings) prior to submission of the first planning application was 3.9 years. Further, the average length of the period from validation to an implementable permission (but still excluding any discharge of conditions) for sites of 2,000+ dwellings was 6.1 years. The average for all large sites (above 500 dwellings) was 5 years. The period between permission being granted and delivery of the first completions is however shorter for the very large sites at circa 0.8 years for schemes of 2,000 dwellings or more. This indicates a total lead-in to delivery for the very large schemes of approaching 11 years on average. The proposed delivery rates for the strategic sites in Warrington bear no resemblance to what has been experienced elsewhere.

4.59 The preferred options consultation document sets out the following trajectory for the 'Garden City Suburb':

<u>Development Trajectory</u>					
	0-5	6-10	11-15	16-20	Total
Garden City Suburb	406	496	48	0	950
Garden City Suburb (Green Belt)	0	2,114	2,096	2,114	6,324
TOTAL	406	2,610	2,144	2,114	7,274

Table 19: Garden City Suburb Housing Trajectory

	0-5	6-10	11-15	16-20	Total
Garden City Suburb (Green Belt)	22	30.3	45.9	18.6	116.80

Table 20: Garden City Suburb Employment Land Trajectory

4.60 The council therefore considers that the 'Garden City Suburb', which is yet to be removed from the Green Belt and clearly does not have a planning application pending determination at the

base date, will deliver an average of 522 dwellings per annum from years 6 to 10. This would be preceded by 406 dwellings in years 0-5 on the non-Green Belt part of the site. These delivery expectations are extremely ambitious, and in our view are unrealistic. The council will need to evidence why it firstly considers that any dwellings are deliverable on these sites in this period and secondly how it has concluded that they will start delivering in the respective years and at the build rates assumed in the trajectory.

- 4.61 In terms of the proposed lead in times for the 'Garden City Suburb', a significant amount of infrastructure is required. This includes a network of new distributor roads, a new secondary school, up to 4 new primary schools, a major new park, district centre, health facilities and leisure facilities. There is also an acknowledgement on the council's behalf that there may be a need for an additional connection across the Ship Canal. The proposed build rates are unprecedented, and it is unclear how these could be achieved within a realistic phasing plan and the land ownership across the site.
- 4.62 Turning to the South Western Urban Extension, whilst we support the allocation of the site in principle, we have similar concerns in terms of the anticipated timescales for delivery. The council acknowledges in 5.40 and 5.41 of the consultation document that the allocation is dependent on the delivery of a new primary school and local centre, and potentially the delivery of the proposed Western Link Road. If the development is linked to the Western Link Road then this has the potential to significantly delay delivery from the site.
- 4.63 There is also insufficient evidence to justify the Council's delivery expectations from the Waterfront site, which comprises a significant area of previously developed land, and is also dependent upon the delivery of the Western Link Road. It is unclear how 728 dwellings could be delivered in years 0-5, a further 795 dwellings in years 6-10, and then 1,790 dwellings in years 11-15. The Council's assumptions appear to be completely unrealistic.

5 year housing land supply

- 4.64 The proposed strategy would not provide a 5 year housing land supply on adoption of the plan. Even on the Council's own figures, which include for unrealistic delivery rates from a number of sources, only 4,638 dwellings would be delivered in years 0-5 (927 per annum). This is significantly less than the minimum base requirement of 1,113 per annum, before the shortfall accumulated since 2015 is accounted for. It also follows a prolonged period of historic under delivery in Warrington.

4.65 The proposal to allow unmet need to continue to accumulate in the early years of the plan is wholly out of step with the Framework's emphasis on boosting significantly the supply of housing. We consider that the proposed strategy must be amended to provide sufficient land to ensure a 5 year housing land supply on adoption, including addressing previous under delivery in the first 5 years of the plan.

Changes required

4.66 To address the housing land supply issues that we have identified above, we consider that additional deliverable allocations are required. In particular, there is a need to diversify the supply through allocations of a smaller scale, which can come forward quickly to meet identified needs in the short term, unburdened by significant infrastructure requirements.

4.67 The allocation of additional sites that are available and achievable for delivery in the short term is necessary to achieve the overall housing requirement, and also to provide a 5 year supply on adoption of the plan.

Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

4.68 Yes.

4.69 It is considered that the authority should have published details for which specific sites are to be removed from the Green Belt and allocated for employment / housing at this stage. It would have provided a more complete picture and would have enabled the Council to gather more constructive representations to inform the submission version of the plan anticipated in 2018.

4.70 From discussions with the authority, the totals for each settlement have been reached following a review of existing local infrastructure capacity. These are set out in the Area Profiles which form part of the evidence base to the consultation document. The anticipated growth figures seem, on the face of it, to be relatively arbitrary and it is clear that further work is required to determine more specific levels of development. The Council acknowledges this in paragraph 5.49 of the consultation document, stating that the numbers provided are indicative at this stage.

4.71 There is also insufficient analysis within the plan and the evidence base as to the specific development needs within the villages, for example affordable housing need, which is considered to be significant. The Outlying Settlements face some of the most severe

affordability pressures in the borough, and housing land supply has been severely constrained by the Green Belt over many years.

4.72 The anticipated delivery rate for each outlying settlement is as follows:

Settlement	Indicative Green Belt Capacity
Lymm	500
Culcheth	300
Burtonwood	150
Winwick	90
Croft	60
Glazebury	50
Hollins Green	40
TOTAL	1,190

Table 22: Outlying Settlements - Indicative Green Belt Capacity

4.73 We consider that to assist in meeting the overall housing requirement, and also to meet identified needs within the settlements themselves, additional housing should be distributed to the Outlying Settlements. Villages such as Lymm and Burtonwood are currently thriving, and benefit from strong links to the Warrington Urban Area. The Council should use this plan as an opportunity to provide growth and infrastructure improvements in all areas of the borough. Increased housing delivery in Outlying Settlements would drive the economy and contribute significantly to improved infrastructure, facilities and amenities. Constraining development in these settlements is a missed opportunity to ensure that a robust supply of housing, not in direct competition with the strategic allocations, is provided. Such an approach will only exacerbate acknowledged existing affordability issues.

4.74 Furthermore, ensuring a varied supply of smaller, deliverable sites in and around the Outlying Settlements would provide a much needed boost to delivery in the first five years of the plan, which is expected to be constrained due to policy and infrastructure issues with the large allocations. This would ensure that the supply is robust and flexible in the short and medium term, should unforeseen issues arise with the strategic allocations.

5. Conclusions

5.1 We consider that the preferred option as set out by the authority has a number of critical failings:

- The overall housing requirement over the plan period is too low. This is supported by a number of factors, including the proposal to align housing growth with historic jobs growth trends, and the need to address adverse market signals.
- Insufficient land has been identified in the short term, and overall, to meet the identified requirement (let alone a higher figure).
- There is a reliance on large scale strategic sites, with lead in times that will be significant, and consequently the anticipated build rates to deliver in full during the plan period are not realistic.
- The plan has insufficient flexibility to respond to change, for example the non-delivery of strategic sites in part or full. In the absence of such flexibility, there is a real risk that the borough will not be able to demonstrate a sufficient supply of housing land.
- There is insufficient provision of safeguarded land.

5.2 We therefore recommend the following key changes are made and reflected in the submission version of the plan:

- The housing requirement needs to be increased from 1,113 dwellings per annum to a minimum of 1,332 per annum, to reflect the evidence base and the ambitions of the region.
- The supply of housing land should be increased and diversified through the addition of deliverable sites, which are not burdened by significant infrastructure requirements.
- A significant amount of additional safeguarded land should be identified to meet development needs post 2037.

5.3 We consider that these changes are necessary to make the plan sound, and to align it with the economic ambitions borough.

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July 2017

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Last Name:

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Which best describes you? (tick ✓ one option only)

Resident in Warrington

Resident from outside of Warrington

Business

Other, please specify

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Warrington Borough Council

Local Plan

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July 2017

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Other, please specify

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July 2017

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Which best describes you? (tick ✓ one option only)

Resident in Warrington

Resident from outside of Warrington

Business

Other, please specify