

Our Ref: 2013-093

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Warrington Borough Council
Planning Policy and Programmes
New Town House
Buttermarket Street
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21st September 2017

Dear Sir/Madam

Re: Preferred Development Option Regulation 18 Consultation - July 2017

On behalf of our client, Bloor Homes Limited, we set out below representations to the Preferred Development Option Regulation 18 Consultation which is currently out for consultation until 29th September 2017.

The representations made focus on the options proposed for Appleton Thorn and the implications of Preferred Options upon this settlement. Bloor Homes reserve the right to make further representations during future consultations.

Towards a Preferred Development Option

Stage 1 - Development Needs and Associated Land Requirements

The approach proposed by the Council to plan for a level of growth '*above the baseline economic jobs forecast for Warrington*' is supported and demonstrates a commitment from Warrington Council to boost its economic position. The Council also acknowledge (earlier within the consultation document at paragraph 2.21) that it is necessary to align jobs growth with housing need, a process which is also supported.

The Council propose a housing target of 1,113 homes per annum over the Plan period (20 years). Whilst Warrington Council seek to plan for an ambitious level of growth, with a housing requirement to reflect this, they have not sought to adopt the higher growth rate put forward which would have seen historic levels of job growth maintained over the entire plan period. These historic levels had been experienced partly as a legacy of its New Town status, and therefore may not continue at such a rate in the future.

The Council's proposed housing target of 1,113 new homes per annum during the Plan period is close to the need associated with the higher level of growth which would have seen a need for 1,332 homes per annum. It is considered that the proposed need is appropriate and will ensure sufficient housing provision to support the economic growth.

The housing target is a minimum figure, and it will remain important for the Council to continue to boost housing land supply in accordance with the National Planning Policy Framework (NPPF).

At paragraph 4.14 the Council acknowledge that a backlog of 847 homes has built up since the housing target was quashed. Therefore, this figure must be applied to the housing requirement for the first 5 years of the Plan period. It is also important to note that this shortfall figure may increase prior to the adoption of the Plan.

The Council seek to apply a buffer of 5%, as required by the NPPF. Such a buffer is only considered appropriate where authorities have consistently met their housing need requirement in recent years. In the case of Warrington, as set out within the Mid Mersey SHMA Update – Warrington Addendum May 2017, prepared by GL Hearn, paragraph 4.33 and associated Figure 9 confirm that Warrington have more than met its delivery target in every year since 2003, and as such a buffer of 5% is considered to be appropriate.

Urban Capacity

The Urban Capacity Assessment has been carried out through assessment of the updated SHLAA and the Master Planning work undertaken. The report confirms that this identifies a total capacity, within urban areas and on greenfield sites not within the Green Belt of 15,429 homes (9,721 of which are identified in the SHLAA). The use of the SHLAA to inform this figure is welcomed, and the inclusion of our client's site is supported.

The approach taken by the Council to clearly identify the availability of sites outside the Green Belt prior to undertaking a Green Belt assessment and seeking to release sites from the Green Belt is supported. Especially within settlements, such as Appleton Thorn, which are constrained by the Green Belt on all sides, and yet have readily available sites within the settlement boundary which can come forward to address identified need without encroachment into the Green Belt and release of Green Belt sites for development.

However, it is necessary for the Council to recognise that inclusion of a site within the SHLAA, irrespective of the level of further assessment which has taken place, will not guarantee its deliverability and contribution towards the housing land supply. It is often the case that such sites do not benefit from planning permission, and there may be other constraints to delivery. Where possible, the Council should, during further rounds of consultation, seek to obtain further information on the developability and deliverability of sites from landowners and developers, as well as updated information on planning permissions, which will inform the timescales of sites coming forward and their inclusion within housing capacity calculations within Warrington.

Bloor Homes can confirm at this early stage that their site within Appleton Thorn will come forward for development in the short term once planning permission is granted. The development of the site for residential dwellings is in accordance with planning policy and there are no material considerations which indicate that planning permission should not be granted.

It is recognised that the release of land from the Green Belt is very likely to be required to ensure that the housing needs of the local authority are met during the Plan period. However, the Council should ensure that where there are sites available to contribute to the housing supply outside of the Green Belt these have been given due consideration and the contribution they could make to the supply full assessed.

The release of sites from the Green Belt should be informed by the results of the Green Belt Assessment and it should not be the case that a review is undertaken to retrofit a pre-

determined position on the release of sites. Decisions on the release of sites should be informed by the Green Belt Assessment which accompanies this document.

At this stage Bloor Homes have no further comments upon the Green Belt Assessment undertaken and the results of this. However, they reserve the right to provide further comment in the future.

Safeguarded land

The proposition to remove further sites from the Green Belt to be safeguarded to meet development needs beyond the Plan period is supported. However, it is important that the Council ensure that a sufficient amount of land is identified for this purpose to effectively meet future need.

Furthermore, the inclusion of a policy which provides flexibility to the identification of safeguarded land, allowing it to come forward for development prior to the end of the Plan period, should be included. Such a policy will ensure that should the development needs of the Borough not be effectively met by available land and policies, further sites, already identified as suitable for development can come forward. This will assist in ensuring that sites previously identified as acceptable to accommodate future development are brought forward in advance of less suitable sites and maintain the Council's control over the location and distribution of development.

Stage 2 - Strategic Objectives for the Local Plan

Strategic Objectives

Whilst the Strategic Objectives are supported on the whole, it is necessary for the Council to resist placing too much reliance upon the release of Green Belt sites for the delivery of required development.

Instead, Warrington should ensure that all development opportunities have been fully considered outside of the Green Belt prior to releasing parcels of Green Belt. We are aware that this was the purpose of the Urban Capacity Assessment, and acknowledge the Council's approach, providing our comments on this above.

Stage 3 - Assess high level spatial options to accommodate development

Settlement Profiles Main Urban Areas – Appleton Thorn

The intention of Warrington Council to prepare Settlement Profiles of the Main Urban Areas is supported and will ensure that the distribution of development throughout the Borough is reflective of the current infrastructure capacity to accommodate new development.

The inclusion of a comprehensive plan showing all sites submitted as part of the Call for Sites and SHLAA consultations, alongside a plan of the Green Belt Assessment, clearly shows the relatively few sites which are located outside of the Green Belt and therefore capable of coming forward for development, whether residential or otherwise in the short to medium term.

The Open Space Plan identifies our client's site, within Appleton Thorn, as *Incidental Space Public* (coloured yellow on the plan), however this site is not accessible by the public and is

private land without public access. As such, it is considered that the site should be removed from the Open Space Plan.

The profile confirms population and household statistics for Appleton Thorn (January 2017), and also sets out the capacity of a range facilities and services and their ability to expand which will inform the level of additional development within an area. Whilst this is considered to be an important consideration in the distribution of development within a Borough to ensure that future residents have sufficient access to facilities and services, it is a relatively narrow assessment of the infrastructure capacity of the area, as it fails to consider the availability of other services and facilities which may be located outside of the area profiled, but just as accessible, if not more so, to residents. Therefore, it is important that Warrington undertake a more combined profile assessment of the whole Borough and its available infrastructure.

The Settlement Profiles set out proposed Growth Scenarios for each area of focus. For South Warrington 4 Growth Scenarios are put forward within the supporting document. Whilst it is important for the growth of each area to be carefully considered depending upon the capacity of available infrastructure, the potential for infrastructure to expand/increase capacity and also the availability of suitable land within each area, it is also necessary to ensure that the preferred growth options for each of the areas are compatible with each other and reflect the overall needs and demands for housing in Warrington.

The assessment of each of the Growth Scenarios provides a summary of the capacity of local infrastructure to accommodate the proposed level of growth, including local schools, health facilities and open space provision. Whilst a clear assessment of this is supported, it is considered that as well as considering the capacity within the settlement profile area (in this case South Warrington), it would also be prudent for the Council to undertake a 'cross-boundary' assessment of the capacity of services and facilities within other settlement profile areas which may be able to assist in supporting housing delivery in another area. Housing need is a borough wide issue to be addressed and should not be assessed in an insular manner for each settlement/group of settlements.

Where the growth options include provision for additional infrastructure within the proposals, such as new primary schools or health facilities, these could have the benefit of also assisting in the delivery of other sites within the wider area and therefore the additional benefits for the wider area should be carefully considered.

It is evident that the South Warrington Settlement Profile area is characterised by the existence of the Green Belt, providing a specific barrier to the delivery of increased levels of housing within the area. However, the needs of future and existing residents must still be met. Therefore, the Council should seek to deliver a significant proportion of housing within the settlement boundary, which will reduce the need to release Green Belt sites.

Where it is determined that the housing need cannot be met within the settlement boundary, release of Green Belt sites should be informed by the results of the Green Belt Assessment. The Assessment sets out the contribution parcels within the Green Belt make to its purpose, every effort should be made to release sites making a weak contribution to the purpose of the Green Belt in the first instance.

Bloor Homes' site is located within the settlement boundary and has been identified as suitable for housing through the Appleton Thorn Neighbourhood Plan.

At this stage Bloor Homes has no further comments on the growth scenarios proposed, other than the views expressed above. It is anticipated that further representation will be made during site allocations stage.

Land off Stretton Road/Arley Road Appleton Thorn – SHLAA

Our client's site is included within the Strategic Housing Land Availability Assessment (SHLAA Ref 1516). The site has been identified as having a capacity of 79 dwellings, which is reflective of our client's aspirations for the site and as such it is agreed that this is an appropriate figure for the site.

The concluding comments which the SHLAA in relation to this are supported and appear to have been devised through a careful consideration of the site's potential, the identification of the site within the Neighbourhood Plan, and the intentions of Bloor Homes to develop the site.

The findings of the SHLAA in relation to Land off Stretton Road/Arley Road Appleton Thorn, are supported and soundly based. As the developer on this site, Bloor Homes can confirm positive intentions to bring the site forward in the short term.

Appleton Thorn Neighbourhood Plan

Bloor Homes' site is allocated within the Appleton Thorn Neighbourhood Plan as a site where residential development would be considered acceptable, where in accordance with a number of design principles set out in Neighbourhood Plan Policy AT-H3.

The identification of the site within the Neighbourhood Plan demonstrates that the redevelopment of the site (in accordance with relevant design principles) is supported by the Parish Council and local residents.

Bloor Homes have carefully considered the design principles set out within Policy AT-H3 and future development of the site for residential purposes will adhere to these, ensuring it is in accordance with the relevant planning policy.

Next Steps

The Council confirm within Section 6 of the Consultation Document that they will be undertaking *'more detailed site assessments relating to the main development areas as well as all of the submitted 'call for sites''*. This further assessment is supported and will ensure that the deliverability of allocated and the contribution they can make to the housing land supply throughout the Plan period is fully understood as the Local Plan progresses through to adoption.

The commitment to undertake further assessment of sites will ensure that the allocation of sites and the identification of safeguarded land is fully justified and is soundly based.

Conclusion

On the whole, the approach proposed to be taken forward by Warrington Council within the Preferred Development Option Consultation document is supported by Bloor Homes. It is considered that the Council have sought to ensure that sufficient housing land is provided throughout the Plan period to meet the housing needs of the Borough, and also to ensure that the jobs growth aspirations can be effectively met. The Council have accepted a higher growth rate that is also reflective of infrastructure capacity and future infrastructure capacity.

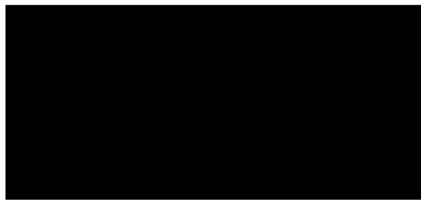
The approach by the Council to seek to identify sites within the urban area and on the edge of settlements prior to releasing sites from the Green Belt is supported, and demonstrates a sustainable approach to housing delivery in the Borough.

Bloor Homes appreciate the opportunity to submit representations on the Preferred Development Options Local Plan, and trust that the above comments are of assistance and will be given due consideration in the Local Plan process.

Our client reserves the right to make further representations during the Local Plan process on matters addressed within these representations and on additional matters of relevance to them.

Should Warrington Council require any additional information on the above points, or require any further information in relation to sites within our client's interest please do not hesitate to contact me.

Yours sincerely,



Senior Planner

On behalf of NJL Consulting