

■

Warrington Borough Local Plan

Preferred Development Option Regulation 18 Consultation - July 2017



September 2017

CONTENTS

| | |
|--|-----------|
| Executive Summary | 3 |
| 1 Introduction | 5 |
| 1.1 Introduction | 5 |
| 1.2 Context | 5 |
| 1.3 Previous submissions | 5 |
| 1.4 National Policy | 6 |
| 1.5 The White Paper | 6 |
| 2 Duty To Cooperate | 9 |
| 3 Evidence Base | 10 |
| 3.1 Objectively Assessed Housing Needs | 10 |
| 3.2 Green Belt Assessment | 14 |
| 3.3 Sustainability Appraisal | 15 |
| 4 Development Needs | 16 |
| 4.1 Planning for Growth | 16 |
| 4.2 Maximising Urban Capacity | 16 |
| 4.3 Land Requirements for Housing and Employment | 17 |
| 4.4 Safeguarding Requirements | 18 |
| 5 Strategic Objectives | 20 |
| 5.1 Strategic Objectives | 20 |
| 6 Spatial Options | 21 |
| 6.1 Spatial Options | 21 |
| 6.2 Preferred Growth Level and Spatial Option | 21 |
| 7 Development Locations | 23 |
| 7.1 Development Location Options | 23 |
| 7.2 Preferred Main Development Locations | 23 |
| 7.3 Outlying Settlements | 23 |
| 8 Preferred Development Option | 25 |
| 8.1 Overall Approach – Warrington New City | 25 |
| 8.2 City Centre | 25 |
| 8.3 Wider Urban Area | 25 |
| 8.4 Warrington Waterfront | 25 |
| 8.5 Warrington Garden City Suburb & South Western Warrington Urban Extension | 26 |
| 8.6 Outlying Settlements | 27 |
| 9 Development Trajectory | 28 |
| 9.1 Trajectory | 28 |
| 10 Conclusions | 29 |
| 10.1 Overview | 29 |

EXECUTIVE SUMMARY

- i. This representation provides Gladman Developments Ltd. (Gladmans') written representation on the Warrington Local Plan Preferred Development Options which is currently out for public consultation.
- ii. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.
- iii. These representations concern the following matters:
 - Duty to cooperate
 - Evidence Base
 - Development Needs
 - Strategic Objectives
 - Spatial Options
 - Development Locations
 - Preferred Development Options
 - Development Trajectory
- iv. The Preferred Development Options version of the Warrington Local Plan sets out that the Council are planning for 22,260 homes (2017-2037) which equates to 1,113 dpa. The consultation document explains that they are planning for a level of growth in accordance with the LEP's Strategic Economic Plan, which is an increased level of growth for Warrington. This ties in with the ambition and objectives of the Council for Warrington to transform from a New Town into a New City.
- v. Gladman are supportive of this ambitious approach and the Council planning for a level of housing delivery to align with increased economic growth in the area. This is a pro-growth approach which aligns with the ethos of the Framework seeking to boost significantly the supply of housing.
- vi. Careful consideration needs to be given to the development strategy that forms the basis for the distribution of growth across Warrington. The preferred development strategy places significant reliance on the delivery of two large sites (the Garden City Suburb and the South West Urban Extension) along with significant growth being directed to the City Centre and the Waterfront. Whilst these large sites and city centre locations have a role to play, the Council needs to ensure that the proposed strategy is deliverable during the plan period and that they are relying upon realistic assumptions regarding the scale and timescales for delivery in these locations. Gladman

highlight fundamental concerns regarding the housing trajectory and the delivery assumptions applied to these sites which will impact on the delivery of the Plan as a whole.

- vii. Gladman believe greater flexibility is required and that further growth should be directed to the outlying settlements where there are sustainable growth opportunities available. Additional sites in these locations could help deliver housing in the short and medium term.
- viii. Gladman consider it essential that the Council allocates a range of housing sites in a variety of locations and of a variety of sizes to ensure that the housing needs of local people are delivered in the short term before the large strategic sites or city centre sites come on stream. This would ensure that the Council can maintain a rolling supply of housing land over the course of the plan period and consequently ensure that the plan is effective.
- ix. Gladman welcome the opportunity to comment on the Preferred Options of the Warrington Local Plan and request to be kept updated as the plan progress and the Council undertake further stages of public consultation.

1 INTRODUCTION

1.1 Introduction

1.1.1 This representation is made by Gladman Developments Ltd (Gladman) in response to the current consultation on the Preferred Development Options of the Warrington Local Plan. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.

1.1.2 Gladman has considerable experience in the development industry in a number of sectors including residential and employment development. From that experience it understands the need for the planning system to provide local communities with the homes and jobs that they need to ensure that they have access to a decent home and employment opportunities.

1.1.3 Gladman have considerable experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of this experience that the comments are made in this representation.

1.2 Context

1.2.1 The Warrington Local Plan Core Strategy was adopted in July 2014. It sets out the planning framework for guiding the location and level of development in the borough up until 2027. The Local Plan Core Strategy was subject to a High Court Challenge, which was heard in February 2015, with judgment given on 19th February by Mr Justice Stewart.

1.2.2 The Judge ruled in favour of the council on 6 of the 9 issues that had been challenged. The outcome has resulted in the removal of the following elements of the housing policies from the Local Plan:

- The housing target of 10,500 new homes (equating to 500 dpa) between 2006 and 2027.
- References to 1,100 new homes at the Omega Strategic Proposal.

1.2.3 The Council are in the process of preparing a review of its Local Plan. Following an initial consultation on the scope and contents of the Local Plan Review the Council has now prepared its Preferred Development Options, which is now the subject of public consultation.

1.3 Previous submissions

1.3.1 Gladman submitted representations on the scope and contents of the Local Plan consultation which was conducted in November/December 2016.

1.4 National Policy

1.4.1 The National Planning Policy Framework (the Framework) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **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 a proportionate evidence base;
- **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.

1.5 The White Paper

1.5.1 The Government White Paper ('Fixing our Broken Housing Market') issued in February 2017 is a very clear statement from Government on the importance of the delivery of housing to the wider economy. The Government are in no doubt that the housing market in Britain is broken which, according to the Prime Minister, is one of the greatest barriers to progress in the country today.

1.5.2 Average house costs are almost eight times average earnings which is an all-time record and soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.

1.5.3 The reason for this crisis is that the country is simply not building enough homes and has not done so for far too long. The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and to start to tackle years of under-supply.

1.5.4 Everyone involved in politics and the housing industry therefore has a moral duty to tackle this issue head on. The White Paper states quite unequivocally that *"the housing shortage isn't a looming crisis, a distant threat that will become a problem if we fail to act. We are already living in it."*

1.5.5 Tackling the housing shortage is not easy. It will inevitably require some tough decisions. But the alternative, according to the White Paper, is a divided nation, with an unbridgeable and ever-widening gap between the property haves and have-nots.

1.5.6 The challenge of increasing supply cannot be met by government alone. It is vital to have local leadership and commitment from a wide range of stakeholders, including local authorities, private developers, housing associations, lenders and local communities.

- 1.5.7 The starting point is building more homes. This will slow the rise in housing costs so that more ordinary working families can afford to buy a home and it will also bring the cost of renting down. We need more land for homes where people want to live. All areas therefore need a plan to deal with the housing pressures they face.
- 1.5.8 Currently, over 40 per cent of local planning authorities do not have a plan that meets the projected growth in households in their area. All local authorities should therefore develop an up-to-date plan with their communities that meets their housing requirement based upon an honest assessment of the need for new homes.
- 1.5.9 Local planning authorities have a responsibility to do all that they can to meet their housing requirements, even though not every area may be able to do so in full. The identified housing requirement should be accommodated in the Local Plan, unless there are policies elsewhere in the Framework that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly and demonstrably outweigh the benefits. Where an authority has demonstrated that it is unable to meet all of its housing requirement, it must be able to work constructively with neighbouring authorities to ensure the remainder is met.
- 1.5.10 Plans should be reviewed regularly, and are likely to require updating in whole or in part at least every five years. An authority will also need to update their plan if their existing housing target can no longer be justified against their objectively assessed housing requirement.
- 1.5.11 Policies in Local Plans should also allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector including opportunities for SME housebuilders to deliver much needed housing.
- 1.5.12 In terms of rural areas, the Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up. It is clear that improving the availability and affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people.
- 1.5.13 Finally, the Government has made it clear through the White Paper that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.
- 1.5.14 The White Paper is the cornerstone of future Government policy on fixing the broken housing market. It provides the direction of travel the Government is intending to take and is a clear statement of intent that this Government is serious about the provision of the right number of houses in the right places. The Warrington Local Plan therefore needs to consider these policy

intentions now in order to ensure that it fulfils the Government’s agenda and provides the homes that its local communities need.

- 1.5.15 Following the election, Sajid Javid re-iterated the Government’s intentions for boosting housing growth stating that he wants areas that have benefitted from soaring property prices to play their role in solving the housing crisis. Mr Javid pointed out that where property prices were particularly unaffordable, local leaders would need to take a long, hard and honest look to see if they are planning for the right number of homes.
- 1.5.16 The consultation on a new standardised methodology for calculating housing need has now been published. It should be noted that this is only out for consultation purposes and it is still at a very early stage. It does however highlight that the housing market in this country is dysfunctional and the root cause is that for too long we haven’t built enough homes. It also refers to the Government’s fundamental goal of boosting significantly the supply of housing across the country in order to deliver 266,000 units per annum as a minimum. It is also important to note that the consultation document makes reference to local planning authorities being able to deviate from the methodology to lead to a housing level above that identified in the standardised methodology linked to economic growth ambitions.

2 DUTY TO COOPERATE

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the PPG, it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard Warrington must be able to demonstrate that it has engaged and worked with neighbouring authorities, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3 Gladman note and welcome the section within the consultation document covering the issue of the Duty to Cooperate (paragraphs 2.36 to 2.41). This illustrates that the Council is actively seeking to discharge its requirements under the Duty to Cooperate.
- 2.1.4 At this stage Gladman do not raise any specific concerns regarding the Duty to Cooperate, however at the later stages we would expect to see a supporting statement or detailed evidence from the Council which clearly outlines its reasons for pursuing its chosen strategy, how it has discharged its requirements under the Duty to Cooperate and how the Plan has responded to any cross boundary issues.

3 EVIDENCE BASE

3.1 Objectively Assessed Housing Needs

3.1.1 The current process of undertaking an OAN is clearly set out in the Framework, principally in §14. §47, §152 and §159 and should be undertaken in a systemic and transparent way to ensure that the plan is based on a robust evidence base.

3.1.2 The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing markets cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out factors that should be included in a SHMA including identifying:

“the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- **Meets household and population projections taking account of migration and demographic change;**
- **Addressed the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and**
- **Caters for housing demand and the scale of housing supply necessary to meet this demand.”**

3.1.3 Key points that are worth noting from the above are that the objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is also worth pointing out that any assessment of housing need and demand within the SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, offsetting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in the area.

3.1.4 Of particular importance is the need to consider market signals. The consideration of market signals is one of the core planning principles considered in §17 of the Framework, which states:

“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.”

3.1.5 Of critical importance is what the Framework goes on to say in §158 in the section discussing Plan Making. It states here that:

“Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”

3.1.6 Market signals are therefore at the very core of what the Framework is trying to achieve in promoting sustainable development and boosting the supply of housing land.

3.1.7 The Planning Practice Guidance (PPG) gives further explanation to what the Framework means with regards to market signals, and sets out in a range of paragraphs the way in which local planning authorities should go about factoring in relevant market signals in arriving at their OAN. §19 and §20 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below extract identifies some particularly pertinent points:

“The housing need number suggested by household projections (the starting point) should be adjusted to reflect the appropriate market signals, as well as other market indicators of the balance between demand for and supply of dwellings. Prices of rents rising faster than national/local average may well indicate particular market undersupply relative to demand.”

3.1.8 The paragraph goes on to indicate that these factors would include, but should not be limited to land prices, house prices, rents, affordability, rates of development and overcrowding. However, given what the Framework says at §17, quoted above, it seems clear that particular consideration should be given to affordability.

3.1.9 In order to consider how market signals should be taken forward §20 identifies some key concepts:

“Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.”

3.1.10 It is therefore clear that where market signals are apparent (in any of the indicators assessed) there is an absolute and clear direction that an upward adjustment to housing numbers is required. It is also clear that both the level of change and the rates of change are considerations and that local

planning authorities need to carefully benchmark themselves against other areas. This should not simply be a case of considering neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Gladman are firmly of the view that considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and the PPG are trying to tackle with regard to housing.

- 3.1.11 What is of further importance when considering these issues is the period of time analysed when considering both relative and absolute change. It has become apparent in our consideration of a number of plans, that many local planning authorities choose to look at periods of time which are not fully representative of the depth of the housing crisis which we are currently within.
- 3.1.12 Gladman is of the view that local planning authorities must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the normal time span of a Local Plan. Authorities should assess as a constituent part of their OAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period which would enable this step change and consider its deliverability in the plan. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis.
- 3.1.13 The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in *Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited* where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgement it was stated:

“The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy’s methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. [...] The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies”.

- 3.1.14 Therefore, following the exercise to identify the full OAN for housing in an area:

“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these

dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.” (NPPF §152)

3.1.15 This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable, should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.

3.1.16 The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above:

“Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:

- **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or**
- **specific policies in this Framework indicate development should be restricted.”**

3.1.17 It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:

“sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion”.

3.1.18 Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.

3.1.19 As outlined earlier in this submission the consultation on a new standardised methodology for calculating housing need has now been published. It should be noted that this is only out for consultation purposes and it is still at a very early stage. It does however highlight that the housing market in this country is dysfunctional and the root cause is that for too long we haven't built enough homes. It also refers to the Government's fundamental goal of boosting significantly the supply of housing across the country in order to deliver 266,000 units per annum as a

minimum. It should also be noted that the proposals would still allow for local authorities to plan for a higher scale of housing growth to respond to economic growth potential.

Mid-Mersey SHMA Update

3.1.20 The most recent evidence is the Mid-Mersey SHMA Update – Warrington Addendum (2017, GL Hearn). Gladman note that the SHMA update considers the impact of the LEP devolution proposals to create 31,000 additional jobs in the borough from 2015 to 2040. This equates to 28,520 jobs over the SHMA period to 2037 and has led to the proposed housing requirement in the consultation document of 1,113 dpa.

3.1.21 As outlined later in this submission, Gladman are supportive of the proposed housing requirement and the approach which considers the economic growth potential of the borough.

3.2 Green Belt Assessment

3.2.1 Gladman note that the current evidence on the Green Belt comprises of the Green Belt Assessment, Original Report (October 2016), Additional Site Assessments (July 2017) and Green Belt Assessment Addendum (June 2017).

3.2.2 Gladman refer to section 9 of the Framework which provides the national policy framework in relation to the protection of Green Belt land. This provides details regarding how Green Belt boundaries should only be established through Local Plans. Paragraph 85 outlines that 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;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

3.2.3 Gladman are supportive of the Council's approach and decisions regarding the need to remove land from the Green Belt in order to meet development needs.

3.2.4 Gladman note that the amendments to be made around the outlying settlements and sites which will be removed from the Green Belt in these locations have not yet been identified. It is important that the decisions reached and site selection of Green Belt sites is transparent and based on robust assessment of sites against the five purposes of the Green Belt. Gladman reserve the right to provide submissions once this element of the plan is published.

3.3 Sustainability Appraisal

3.3.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.

3.3.2 Critically, the National Planning Policy Framework at Paragraph 165 sets out that::

“a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.”

3.3.3 Following this the Planning Practice Guidance (PPG) requires that different realistic and deliverable options for policies within the Plan are tested, setting out:

“they must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.”

3.3.4 The SA is required to set out why those reasonable alternatives were chosen. In terms of housing policies for the Plan this means the need to test:

- I. Reasonable alternatives on the quantum of development (i.e. the housing requirements); and,
- II. Reasonable alternatives on the distribution of development (i.e. the spatial strategy and combination of site allocations to be made

3.3.5 The Warrington Local Plan should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the decision making and scoring should be robust, justified and transparent.

3.3.6 Gladman remind the Council that there have now been a number of instances where the failure to undertake a satisfactory SA has resulted in a local plan failing the test of legal compliance at Examination or being subjected to legal challenge.

4 DEVELOPMENT NEEDS

4.1 Planning for Growth

- 4.1.1 The Preferred Development Options version of the Warrington Local Plan sets out that the Council are planning for 22,260 homes (2017-2037) which equates to 1,113 dpa. The consultation document explains that they are planning for a level of growth in accordance with the LEP's Strategic Economic Plan, which is an increased level of growth for Warrington. This ties in with the ambition and objectives of the Council for Warrington to transform from a New Town into a New City.
- 4.1.2 Gladman are supportive of this ambitious approach and the Council planning for a level of housing delivery to align with increased economic growth in the area. This is a pro-growth approach which aligns with the ethos of the Framework seeking to boost significantly the supply of housing.
- 4.1.3 Gladman are supportive of the approach to align the housing need with the job growth proposed through the LEP Strategic Economic Plan. This approach confirms with the Framework (specifically paragraph 158) and the PPG (ID 2a-018).
- 4.1.4 It is however still fundamental that this proposed housing requirement is identified as a minimum delivery requirement and not a cap or ceiling on housing delivery in the area. Further levels of sustainable growth over and above this should be seen as a positive.
- 4.1.5 Paragraph 2.10 of the consultation document outlines that the Government will shortly be consulting on a standard methodology for calculating housing need across the country and that consequently it will be important that Warrington's housing needs are kept under review. Gladman agree with this statement and note that the Government consultation on the new standardised methodology has now been published. The Government has also indicated that there will be the ability for local planning authorities to deviate from the standardised methodology under certain circumstances. Gladman believe that given the growth potential of the area and the recent devolution deal, Warrington would have a strong case to increase its housing figure, in order to meet the identified economic potential.
- 4.1.6 Warrington's pro-growth approach is supported and this should not be rescinded.

4.2 Maximising Urban Capacity

- 4.2.1 In terms of delivering the proposed housing growth, the Council are seeking to maximise the urban capacity. Through the Council's recent urban capacity work they have confirmed a total urban capacity of 15,429 homes.
- 4.2.2 Whilst maximizing the delivery of housing in the urban areas and on previously developed land is a laudable aim the Council need to ensure they are applying realistic delivery assumptions to

these types of locations, that the sites are available and that the proposals will be capable of being delivered within the timescales proposed.

- 4.2.3 Gladman note that a significant amount of the 15,429 identified urban capacity are anticipated to be delivered in the first 10 years of the plan period, whilst delivery in other locations is limited within this same period. Gladman consider the scale of deliver proposed for the City Centre, Wider Urban Area and Waterfront (as shown in Table 11) for the first 10 years of the plan period to be overly optimistic.
- 4.2.4 There are likely to be inherent difficulties with developing some of the urban area, which will mean that early delivery is unlikely. Some of the city centre sites are currently occupied by other uses and consequently there is no guarantee that these are available and will come forward for housing within the plan period, let alone the first 10 years. There is therefore significant doubt over the timescales and deliverability of the identified 15,429 dwellings.
- 4.2.5 Whilst delivering the urban capacity should be a key component of the development strategy, Gladman believe that as currently drafted the preferred development option document places too much emphasis and reliance on this component of housing supply and consequently will put the delivery of the identified scale of housing over the course of the plan period at risk.

4.3 Land Requirements for Housing and Employment

- 4.3.1 As outlined previously in this submission, the 22,260 housing requirement (1,113 dpa) should be expressed as a minimum requirement.
- 4.3.2 Table 1 of the consultation document, which outlines the housing requirement, identifies a 5% flexibility factor. Gladman support the inclusion of an element of flexibility as this is consistent with the Framework requirement for plans to be flexible and able to respond to changes in circumstances.
- 4.3.3 Notwithstanding this, Gladman do not believe the 5% flexibility factor is sufficient. Paragraph 4.13 of the consultation document acknowledges that this is at the lower end of the flexibility rates considered by Local Plan inspectors in recent Local Plan examinations, but that the Council considered due to their recent track record of delivery that this is sufficient. Gladman do not support this statement and recommend the inclusion of a higher flexibility factor is important to ensure the delivery of the plan. Gladman believe this to be of particular importance for this local planning authority given the proposed spatial strategy and heavy reliance being placed on the delivery of three large growth areas (Waterfront, Garden City Suburb and South West Urban Extension). The proposed strategy which outlines 3 growth areas along with significant delivery in the urban area is a risky strategy in terms of the timescales for delivery of housing and therefore warrants a greater level of flexibility.
- 4.3.4 Gladman note that the Local Plans Expert Group (LPEG) recommended a 20% flexibility factor or buffer for Local Plans. Gladman would support the inclusion of a 20% flexibility factor for the Warrington Local Plan.

- 4.3.5 Gladman submit that the Council should be including a range of sites in range of locations in order to ensure maximum delivery of housing throughout the plan period.
- 4.3.6 Gladman note that that the Council, within the 2017 SHLAA, are applying the assumption that on all sites over 2ha they will achieve a 75% net developable area. This may be achievable for some sites however, Gladman believe that for the large strategic sites this may well be much lower and more in the region of 50%. Gladman recommend that this is given further consideration by the Council as it may mean that not enough sites/land has been identified, this further highlights the need for a greater flexibility factor to be included within the Local Plan.

4.4 Safeguarding Requirements

- 4.4.1 Paragraph 4.20 of the consultation document outlines how the Council intend to remove further land from the Green Belt so that it can be safeguarded to meet development needs for a further 10 years beyond the plan period. Gladman support the identification of the need for safeguarded land within the preferred option of the Warrington Local Plan.
- 4.4.2 The Framework is clear that Local Plans should identify safeguarded land to meet the longer term development needs. Specifically, paragraph 85 states *“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.”* The Framework goes on to state that Local planning authorities’ should *“satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.”*(paragraph 85).
- 4.4.3 Table 3 of the consultation document outlines the safeguarded land requirement. This is based on the OAN of 955 for 9 years. The rationale for using 9 years is supposedly that 10 years can be made up by combining the 9 years’ worth of OAN with the 5% flexibility factor (equivalent to 1 years supply). Gladman are concerned by this approach as the 5% flexibility factor is provided to ensure that the proposed scale of housing required is delivered during the current plan period, it therefore follows that if this flexibility factor is required during the current plan period then it will not be available for beyond the plan period.
- 4.4.4 A further concern with the approach to the scale of safeguarded land to be provided for within the local plan is the assumption made in paragraph 4.24 regarding the urban to Green Belt land split for the safeguarding period. The Council are proposing that a similar ratio will be appropriate for beyond the plan period. The current plan is proposing to maximise the urban capacity within this plan period, therefore if the strategy is successful the majority of urban land will not be available for beyond the plan period. Gladman contend that there would therefore need to be a greater reliance upon safeguarded land in the future and consequently the 137.52 ha proposed is insufficient.
- 4.4.5 Gladman also recommend that the Local Plan should include clear triggers for when the safeguarded land could be released from the Green Belt. Without this the policy approach lacks clarity.

- 4.4.6 Safeguarded Land is an important element of the Local Plan to ensure the permanence of the Green Belt, therefore it is fundamental that sufficient safeguarded land is identified, that it is appropriate and deliverable and that the Local Plan includes triggers to guide the development industry on when this land can be brought forward for development. As currently drafted the scale of safeguarded land appears to be insufficient and the policy framework will not be effective as it lacks clarity and specifically lacks a trigger mechanism.

5 STRATEGIC OBJECTIVES

5.1 Strategic Objectives

- 5.1.1 Table 5 of the consultation document outlines the 6 proposed Strategic Objectives for the Local Plan. Objective W1 refers to enabling the transition of Warrington from a New Town to a New City, and that to do this will involve delivering a minimum of 22,260 new homes per year between 2017 and 2037. Following on from this the second objective, W2 seeks to facilitate the sensitive release of Green Belt land to meet housing and employment needs whilst ensuring the permanence of the Green Belt in the longer term.
- 5.1.2 Gladman are broadly supportive of the objectives set out in the consultation document, it is key that the policies proposed and the overall development strategy taken forward are capable of making these objectives a reality.
- 5.1.3 Paragraph 4.37 of the consultation document outlines that the starting point for the new objectives was to reflect the current objectives from the existing Plan; however these then needed to be updated to take account of changes in circumstances and policy. Gladman support the approach taken by the Council to update the strategic objectives.

6 SPATIAL OPTIONS

6.1 Spatial Options

6.1.1 Paragraph 4.49 of the consultation document outlines the three high level growth scenarios for the spatial distribution of development as follows:

- Option 1 – Green Belt Release only in proximity to the main Warrington urban area;
- Option 2 – Majority of Green Belt release adjacent to main urban area with incremental growth in outlying settlements;
- Settlement extensions in one or more settlements with remainder of growth adjacent to main urban area.

6.1.2 Gladman note that all of the options would seek to maximise urban capacity, the differences arise out of their approach to the allocation of Green Belt land for housing. Gladman refer back to previous concerns outlined in this submission regarding the scale, delivery and timing of bringing forward housing in the urban area.

6.1.3 The Council believe that all three options would be capable of delivering the scale of development needed. Gladman support the consideration of different spatial options, however believe that a further option which allows for further significant growth to all the outlying settlements should be considered. This would involve a wider spread of Green Belt release sites of varying scales which would assist in delivering housing in the early years of the plan.

6.2 Preferred Growth Level and Spatial Option

6.2.1 Paragraph 4.51 of the consultation document outlines how both the preferred growth level and spatial option were tested against the Local Plan objectives assessment criteria. Following this exercise the Council confirmed Option 2 as the preferred option.

6.2.2 Whilst Gladman support the preferred level of growth (1,113 dpa) Gladman object to the preferred spatial option (Option 2). Through Option two the Council are only proposing incremental growth to the outlying settlements. Gladman object to this and urge the Council to allow for further growth in these sustainable locations. Additional sites on the edges of the outlying settlements could provide further flexibility to the plan. Smaller/medium sites could also help ensure delivery in early years of the plan.

6.2.3 In allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary a wider

variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

- 6.2.4 Gladman refer back to earlier sections of this submission in relation to significant concerns over the delivery of the proposed scale of housing in the urban area within the timescales proposed. In addition to this Gladman urge the Council to ensure that the delivery assumptions being applied to the large strategic sites (the Garden City Suburb, the SUE and the Waterfront) are realistic and achievable. If the Council are over optimistic with regards to the delivery of these sites then the plan will not be effective and the Council will fail to deliver the necessary scale of housing over the plan period.

7 DEVELOPMENT LOCATIONS

7.1 Development Location Options

7.1.1 Having identified the preferred broad spatial option (Option 2) the consultation document then moves on to consider the options for the main development locations. These are set out as follows:

- Option 1 – A Garden City Suburb to the south east of Warrington main urban area of approximately 8,000 homes;
- Option 2 – A Garden City Suburb of approximately 6,000 homes and an urban extension to the south west of Warrington of up to 2,000 homes;
- Option 3 – A Garden City Suburb of approximately 6,000 homes and an urban extension to the west of Warrington of up to 2,500 homes;
- Option 4 – A Garden City Suburb of approximately 4,000 homes and an urban extension to the south west of Warrington of up to 2,000 homes and an urban extension to the west of Warrington of up to 2,500 homes; and
- Option 5 – A more dispersed pattern of Green Belt release adjacent to the main urban area.

7.1.2 Gladman have no additional comments regarding these development location options but reiterate concerns raised elsewhere in this submission regarding the preferred development strategy and the significant focus on two large strategic sites, along with maximising the urban capacity and delivering the Waterfront site.

7.2 Preferred Main Development Locations

7.2.1 These development option locations were assessed against the plan objectives and subject to SA/SEA. Based on these assessments the Council concluded that Option 2, A Garden City Suburb of approximately 6,000 homes and an urban extension to the south west of Warrington of up to 2,000 homes, performed best and is therefore the preferred development

7.2.2 The Council need to be able to demonstrate with a degree of certainty that it can provide sustained delivery at the rates anticipated through the Garden City Suburb and the South West Urban Extension. If delivery falls short of that which is being proposed the Council run the risk of the plan as a whole failing. This approach combined with the significant focus on the urban capacity is a high risk strategy.

7.3 Outlying Settlements

7.3.1 Gladman recommend that further growth needs to be allocated to the outlying settlements and consequently a greater scale of amendments to the Green Belt boundaries will be needed.

Medium sized sites in these locations will provide greater choice and competition in the housing market and these sites are likely to be capable of starting to deliver quicker than the Garden City Suburb and the SUE.

- 7.3.2 Sustainable growth opportunities existing on the edge of settlements such as Lymm and should not be overlooked in place of a high risk strategy which may fail to deliver the necessary scale of housing within the plan period. Allowing for an increased scale of delivery in the outlying settlements could provide additional flexibility through additional allocations.

8 PREFERRED DEVELOPMENT OPTION

8.1 Overall Approach – Warrington New City

8.1.1 The preferred development option identifies four main areas of growth; the City Centre, the Waterfront, the Garden City Suburb and the South West Urban Extension. In addition to this the plan allows for the optimisation of development through the remaining neighbourhoods of the urban area and incremental growth in the outlying settlements. At this stage the Council has not identified specific sites or definitive boundaries. Paragraph 5.6 outlines that this detail will be provided in the submission version of the plan.

8.1.2 Gladman note and object to the fact that the land identified to be safeguarded in the plan is all provided as an extension to the Garden City Suburb. Whilst Gladman do not object to this and being allocated as SGL, Gladman do object to this being the sole area identified for this purpose. Gladman recommend that the plan should identify alternative safeguarded land elsewhere, in addition to an element of SGL in this location, to meet the needs of other locations beyond the plan period.

8.2 City Centre

8.2.1 Paragraph 5.14 of the consultation document outlines that the regeneration and evolution of the Town Centre is a priority for the Council. Whilst Gladman support this aim, it is important that the Council are not unrealistically ambitious regarding the delivery in this area. Table 13 outlines the City Centre Housing Trajectory, which shows a total of 3,526 dwellings to be delivered during the Plan period, with 2,609 of this assumed within the first 10 years. Gladman raise concerns regarding the delivery of this scale in this area in the early years of the plan. Gladman believe the trajectory for this area is optimistic particularly given the inherent difficulties of developing some of the urban area. As Gladman understand, a number of the city centre sites are currently occupied by alternative uses, casting further doubts on the timescales proposed.

8.3 Wider Urban Area

8.3.1 Paragraph 5.19 of the consultation document outlines that the Council is proposing the same approach to the wider urban area to that set out in the adopted Local Plan Core Strategy. Table 15 sets out the assumed delivery of 4,869 dwelling in the wider urban area during the first 15 years of the Plan.

8.3.2 Gladman have no specific comments regarding this element of the preferred development option.

8.4 Warrington Waterfront

8.4.1 Paragraph 5.24 of the consultation document outlines that this significant area of previously developed land provides the opportunity to create a new community which could deliver around 4,000 homes and open up Port Warrington to become one of the most important employment

areas in the North West region. Table 17 provides the trajectory for the housing element of this proposed site, suggesting a total of 4,032 dwellings over the 20 year plan period.

- 8.4.2 Whilst Gladman do not object to the principle of this site, and support this as a key opportunity to deliver housing and employment growth, Gladman urge the Council to ensure the delivery assumptions being applied to this site are realistic. Any delay in the delivery of this site will have knock on effects for the delivery of the plan as a whole, particularly as the Local Plan only includes a 5% flexibility factor.

8.5 Warrington Garden City Suburb & South Western Warrington Urban Extension

- 8.5.1 The Warrington Garden City Suburb and South Western Warrington Urban Extension are 2 of the 4 key areas of growth identified and are proposed to deliver a significant proportion of the total housing requirement over the course of the plan period.
- 8.5.2 Similarly to comments made with regards to the Waterfront, whilst Gladman do not object in principle to the proposed allocation of these sites, Gladman raise concerns regarding the scale of delivery proposed within the timescales identified. Table 19 provides the trajectory for the Garden City Suburb and outlines that a total of 7,274 dwellings are identified to come forward within the plan period. Whilst the trajectory identifies 406 homes within the first 5 years, this steps up significantly for the second 5 year period to 2,610 dwellings (equating to an annualised delivery of 522).
- 8.5.3 Table 21 provides the assumed trajectory of the South Western Warrington Urban Extension. This identifies a total of 1,831 dwellings to be delivered during the plan period. With no delivery in the first five years.
- 8.5.4 The Garden City Suburb and South Western SUE do not yet have planning permission; therefore it is reasonable to assume that it will be a number of years before they will start delivering units. Whilst this is reflected within the trajectory to a certain degree, Gladman remain unconvinced regarding the assumed delivery assumptions. SUE's and large strategic sites are often complex schemes and require significant issues to be overcome prior to granting planning approval.
- 8.5.5 Gladman raise significant concerns regarding the assumed annual delivery rates for these sites. As an example Table 11 outlines that the assumed annual delivery rates for years 6-10 on the Garden City Suburb are 522 dwellings. Even with multiple outlets on site Gladman do not consider this scale of delivery to be realistic or achievable. If the Plan were to be found sound on this basis it would compromise the delivery of the plan as a whole. Furthermore any delay in delivery in years 6-10 would have a concertina effect in later years (which Gladman also contend have unrealistic delivery assumptions) and further overload the back end of the plan period.
- 8.5.6 Whilst Gladman are supportive of the Plan allocating large strategic sites such as these, it is fundamental that the delivery assumptions applied are realistic otherwise it will jeopardise the

delivery of the plan. As currently drafted Gladman do not believe the plan is deliverable within the plan period.

- 8.5.7 The Council need to be mindful that to maximise housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. An over reliance on these large scale sites, as is proposed, is not a sound approach as the plan will not be deliverable. As outlined below, further opportunities exist, particularly in the outlying settlements, which are currently only allocated limited growth.

8.6 Outlying Settlements

- 8.6.1 Paragraph 5.46 outlines that the preferred option defines an approximate number of homes the Council consider can be accommodated by each of the outlying settlements under the ‘incremental growth’ scenario. This is set out as follows within Table 22 of the consultation document.

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

- 8.6.2 Gladman are unclear of the evidential basis for the apportionment of housing to these outlying settlements. Further clarity is needed for how the Council have determined this apportionment.
- 8.6.3 The growth proposed in these areas is currently relatively limited. As outlined previously in this submission, Gladman strongly object to the scale of growth allocated for the outlying settlements, and believe that this figure should be increased significantly.
- 8.6.4 Gladman submit that providing further growth in these sustainable locations (and identifying proposed allocations to deliver at this level) could help increase housing delivery throughout the plan period (but particularly in the early years) and provide further flexibility and contingency to the preferred development strategy.

9 DEVELOPMENT TRAJECTORY

9.1 Trajectory

- 9.1.1 This section of the submission is in relation to Table 11 of the consultation documents (and the various component tables) and reiterates concerns raised within section 8 of this representation.
- 9.1.2 The overall development trajectory indicates relatively modest levels of delivery within the first five years of the plan period. Whilst Gladman acknowledge that this is a result of the proposed strategy, Gladman suggest that the Local Plan needs further allocations which can come forward early in plan period (as discussed previously this could be in the form of additional sites adjacent to the outlying settlements).
- 9.1.3 Gladman reiterate that the Council need to be able to robustly justify the delivery assumptions applied to the sites included within the trajectory. These delivery assumptions need to be realistic and achievable else the plan as a whole will fail to deliver the necessary scale of housing.
- 9.1.4 Gladman refer back to comments made earlier within this submission regarding the unrealistic delivery assumptions applied to the Garden Suburb and SUE. The Council will need to clearly evidence that it can provide sustained delivery at the rates anticipated over the plan period for these sites in order for the Plan to meet the tests of soundness.
- 9.1.5 Whilst Gladman note that the Trajectory outlines a total delivery of 24,774 which is 2,514 greater than the proposed housing requirement (22,260) Gladman do not consider this provides the sufficient flexibility. Greater flexibility should be provided through greater provision of sites in areas which will not directly compete with the Garden Suburb and the SUE. As outlined previously the outlying settlements have been allocated relatively limited growth over the plan period. These areas could provide additional flexibility through the provision of a greater amount of housing and allocations (yet to be identified).
- 9.1.6 Gladman also highlight that any delays in delivery in the later years of plan could result in the full housing need not being delivered over the plan period. To ensure a more balanced trajectory the Council should consider including further small / medium sized sites (which are 'oven ready') and can start delivering in first 5 years. This would provide greater flexibility and choice.

10 CONCLUSIONS

10.1 Overview

- 10.1.1 Having considered the Warrington Local Plan, Gladman are concerned by a range of matters including the overall development strategy, specifically the focus placed on a few large sites and the maximisation of urban capacity. AS currently drafted Gladman do not believe the plan will be deliverable over the plan period.
- 10.1.2 The plan must be positively prepared, effective, justified and consistent with national policy to be found sound at examination. In the first instance, the Council must start with clearly defining and NPPF and PPG compliant OAN. The Council should then develop a robust housing requirement using the OAN as a starting point. Gladman support the pro-growth approach being used by the council seeking to align the housing requirement with the needs identified in the LEP Strategic Economic Plan.
- 10.1.3 Following on from identifying the scale of housing the plan needs to deliver, careful consideration needs to be given to the spatial strategy that forms the basis of the spatial distribution of growth across the district. All sustainable settlement should be allowed to play their part in meeting their own housing and employment needs as well as contributing to the wider District's requirements. A flexible and varied approach to delivering the development needs of the district will ensure the plan's ultimate deliverability and success.
- 10.1.4 Whilst Gladman support the proposals that Warrington urban area / Garden City Suburb have a key role to play, this should not be at the expense of the outlying settlements and the council need to have certainty regarding the scale and timeframes for likely delivery. An over reliance on these elements of the Plan will put the delivery of the Plan as a whole at risk.
- 10.1.5 This is particularly the case given the complexities of delivering garden city communities; it is considered that there is likely to be a significant shortfall of housing provision in the short to medium term which needs to be addressed through additional smaller scale housing allocations. Gladman recommend that greater flexibility is required in order for the plan to be effective and deliverable.
- 10.1.6 Gladman welcome the opportunity to comment on the Warrington Local Plan preferred development options consultation and hope that the council find these submissions constructive. Gladman request to be added to the consultation database and look forward to reviewing future versions of the Warrington Local Plan in due course.

