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WARRINGTON
Borough Council

Warrington Borough Council

Local Plan

Preferred Development Option

Regulation 18 Consultation

Response from Delph Farm Estates

September 2017



1: Contact Details (Compulsory)

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

Resident in Warrington

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Business

Comments submitted on behalf of

Delph Farm Estates by:

Berrys

BERRYS
PROPERTY | BUSINESS | PLANNING



Question 1

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?

Response:

Housing for older people

■■■■ main business is the running of residential care homes. There is no reference in the Preferred Development Option regarding provision for older persons' accommodation, but we trust the Local Plan will nevertheless include suitable policies to meet the growing need for care.

The Mid Mersey SHMA Update – Warrington Addendum, May 2017 fails to address the requirement for retirement housing and care homes. This omission needs to be rectified, particularly as the Government has indicated in its recent Housing White Paper (February 2017) that it will soon provide guidance on meeting requirements for specialist housing:

"Housing for our future population

*4.42 Offering older people a better choice of accommodation can help them to live independently for longer and help reduce costs to the social care and health systems. We have already put in place a framework linking planning policy and building regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing, **the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people.** Guidance produced under this duty will place clearer expectations about planning to meet the needs of older people, including supporting the development of such homes near local services. It will also set a clear expectation that all planning authorities should set policies using the Optional Building Regulations to bring forward an adequate supply of accessible housing to meet local need. In addition, we will explore ways to stimulate the market to deliver new homes for older people." (Housing White Paper Feb 2017, paragraph 4.42)*

Housing requirement

The Government's consultation on a standard methodology for calculating housing needs published 14th September *supports* Warrington Borough Council's decision to upwardly adjust their housing requirement to reflect their economic aspirations and the Cheshire & Warrington devolution bid. The Government's '*Planning for Homes consultation*' states:

"local planning authorities are able to plan for a higher number than set out by our proposed method. This means that, where there is a policy in place to substantially increase economic growth, local planning authorities may wish to plan for a higher level of growth than our formula proposes." (para 28)

*"Plan makers may put forward proposals that lead to a local housing need above that given by our proposed approach. This could be as a result of a strategic infrastructure project, or through increased employment (and hence housing) ambition as a result of a Local Economic Partnership investment strategy, a bespoke housing deal with Government or through delivering the modern Industrial Strategy. We want to make sure that we give proper support to those ambitious authorities who want to deliver more homes. To facilitate this **we propose to amend planning guidance so that where a plan is based on an assessment of local housing need in excess of that which the standard method would provide, Planning Inspectors are advised to work on the assumption that the approach adopted is sound unless there are compelling reasons to indicate otherwise.** We will also look to use the Housing Infrastructure Fund to support local planning authorities to step up their plans for growth, releasing more land for housing and getting homes built at pace and scale"* (paragraph 46)

Delph Farm Estates also supports Warrington Borough Council's growth agenda and their vision of transitioning to a New City.

Reducing commuting

The two largest net daily commuting flows into Warrington are from Wigan with 4,539 net movements and from St. Helens with 4,288 net movements (source: 2011 census, reported on page 112 of the Economic Development Needs Study October 2016). The evidence therefore strongly suggests a market need for residential development to the north of Warrington, which would contribute to greater sustainability by reducing commuting flows. This evidence has informed our response to question 5 below.

Employment land requirements

The Council's 'Economic Development Needs Assessment' (EDNA) and 'Review of economic forecasts and housing numbers' (October 2016) link the borough's economic prosperity to the provision of land for development. We welcome the Council's recognition that the amount of land allocated in the Local Plan is directly related to how much economic growth it will attract. The more land the Local Plan identifies, the less constrained will be its growth prospects in an increasingly competitive world.

The Council's apparent decision to pursue a level of employment growth that is less than previous trends effectively represents a reduction in the borough's growth, and is substantially less than the 'Northern Powerhouse' proposals. This lowering of the Council's ambitions is inconsistent with its objective of moving from a New Town to a New City and fails to make the most of Warrington's economic strengths.

We agree with the EDNA assessment that the actual take-up of employment land over the past 20 years has been much higher than what would have been predicted based on econometric forecasting, and agree with their conclusions that the need is 380.90 ha to 2037.

Safeguarding land for longer term needs

Given the amount of Green Belt land in Warrington Borough, it is necessary to add a 'flexibility allowance' for development for 10 years beyond the end of the plan period in order to ensure that sufficient land is removed from the Green Belt to meet future land requirements whilst providing long term certainty over the Green Belt boundary. Consequently a ten year 'safeguarded land' allowance of an additional 190.45 ha for employment-related development is required, bringing the total amount of land required for employment purposes to 571.35ha.

Economic requirements are wider than B1, B2 & B8 uses

The Economic Development Needs Assessment (EDNA) notes that businesses have to compete for land, and that if enough land is not available for other uses then it can result in encroachment of business premises. The EDNA notes the, "*reuse of premises for private health clubs and gyms, already a feature in areas such as Winwick Quay. The loss of employment land to alternative uses is thus a significant issue in Warrington and is likely to continue to be so over the period to 2037*" (paragraph 9.46 of EDNS).

The EDNS concludes that, *“Uses that may be located on active employment land are likely to include gyms, small scale medical and veterinary clinics, petrol filling stations and food outlets. Clearly losses of B1/B2/B8 land to other uses are an ongoing issue in Warrington although it is difficult to estimate the full scale of loss which could occur to 2037. Accounting for such losses is one of the reasons why a five-year buffer of additional take up is applied to needs calculations”* (EDNA paragraph 10.64).

The EDNA’s findings highlight the need for land and premises for miscellaneous uses, including leisure, medical, retail and office uses, in order to protect the existing employment areas from pressure.

In light of the above EDNA findings, the Council should ensure that employment sites are allocated that will help meet the above needs and thereby reduce pressure for change of use on industrial parks.

Need for variety of sites

The EDNA finds a realistic employment land supply of 104.53 ha on 14 sites. However just over two thirds of the land supply (69.68 ha) is located at Omega, leaving only 34.85 ha available elsewhere. There is clearly a need to widen the supply, not just in quantitative terms but also to provide a variety of sites of different sizes, in different locations and various ownerships, in order to provide competition and choice for businesses.

We therefore encourage the Council to widen the number and location of allocations for employment uses, to ensure sufficient variety to meet the needs of businesses.

Question 2

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?

Response:

The Government has extended permitted development rights for the change of use of offices to residential, which has led to growing numbers of older offices being converted to this use. This and other measures encouraging the re-development of employment sites may increase the rate of attrition of the stock of employment land over and above historic rates of loss.

The Housing White Paper (February 2017) indicated that the Government intends to revise the National Planning Policy Framework to encourage the re-use of brownfield land, stating:

"Bringing brownfield land back into use

1.24 We must make as much use as possible of previously-developed ('brownfield') land for homes – so that this resource is put to productive use, to support the regeneration of our cities, towns and villages, to support economic growth and to limit the pressure on the countryside. The Government is already pursuing a number of reforms to make this happen, as set out in the annex.

*1.25 Going further, the presumption should be that brownfield land is suitable for housing unless there are clear and specific reasons to the contrary (such as high flood risk). To make this clear, we will **amend the National Planning Policy Framework to indicate that great weight should be attached to the value of using suitable brownfield land within settlements for homes, following the broad support for this proposal in our consultation in December 2015.***"

The anticipated changes to the NPPF are likely to make it easier to obtain planning consent to redevelop existing employment land for residential purposes. This means Warrington Borough Council should anticipate a greater degree of loss of employment land to housing uses over the Plan period, than has been experienced in the past ten years.

We consider that the Borough Council should review its figures in light of the above points.

Question 3

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

Response:

It is important to provide sufficient safeguarded land in order to provide a degree of permanence to Green Belt boundaries beyond the plan period. This can only realistically be achieved if sufficient land is safeguarded to meet anticipated needs for at least 10 years beyond the plan period, ie. to 2047.

Furthermore, plans should be sufficiently flexible to allow for unexpected changes. Brexit and HS2 are two recent examples of major change that was not expected 5 years ago. Adequate quantities of safeguarded land help provide essential flexibility to accommodate unforeseen future directions.

For the above two reasons, Warrington Borough Council should err on the side of providing more safeguarded land, in order that it is not unduly constrained in the future.

Question 4

Do you agree with the new Local Plan Objectives?

Response:

Objective W1 - We support the Council's aspirations to create a New City but to achieve this will require stepping up the amount of employment land required, for the reasons set out in our response to question 2.

Objective W2 – We support the sensitive release of Green Belt land. The Green Belt plays a role in keeping *towns* separate, but should not limit the ability of a New City to expand and join up with district centres and outlying settlements that already fall within its orbit, such as Winwick. To tie in with the Council's vision of a growing New City, we suggest the following changes to the objective:

Objective W2: To facilitate the sensitive release of Green Belt land to meet Warrington's New City's long term housing and employment needs, whilst ensuring the revised Green Belt boundaries maintain the permanence of Warrington's Green Belt in the long term.

Objective W4 re-states the objective of reducing the need to travel, but experience has shown that a step-change is needed to have any real impact. We suggest in our responses to questions 2 & 6 that tackling high levels of net in-commuting should be a key part of the Council's development strategy. To help achieve this we suggest the following changes to objective W4:

Objective W4: To provide new infrastructure and homes close to jobs in order to support Warrington's growth, reduce net in-commuting, reduce congestion and promote sustainable transport options, whilst reducing the need to travel and encouraging active lifestyles.

Question 5

Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

Please see our response under question 6, which covers both questions 5 & 6.

Question 6

Do you have any comments to make about how we've assessed different options for the main development locations?

Response:

Alternative options considered

The alternatives considered by the Council do not include the fairly obvious 'reasonable alternative' of expanding to the north of the Warrington urban area. This omission must be rectified or the plan will not meet the 'justified' test of soundness.

Method of assessment

The assessment of both alternative spatial options and main development locations is too broad-brush and pays insufficient attention to some of the key sustainability issues that were identified through the SA scoping exercise.

An identified key sustainability issue is the high level of commuting into and out of the Borough (page 5 of the Sustainability Appraisal Interim Report). The Economic Development Needs Study provides detailed evidence from the 2011 census on net daily commuting flows, the largest of which are commuting into Warrington from Wigan with 4,539 movements per day and commuting into Warrington from St. Helens with 4,288 net movements per day. The evidence therefore strongly suggests a market need for residential development to the north of Warrington, which would contribute to greater sustainability by reducing commuting flows.

This key sustainability issue should be reflected in the SA Objectives. We suggest that a suitable new sub-heading under 'Accessibility' would be 'Impact on reducing commuting flows' with an appropriate new criteria being ACC6 'Is the site located where it may reduce commuting flows?'

Infrastructure delivery

We disagree with how the Council have assessed the ability of each option to contribute to infrastructure.

The Council's draft Planning Obligations Supplementary Planning Document (SPD) published July 2016 states, "*The Council has commenced the work to introduce a Community Infrastructure Levy (CIL), but this has been delayed to enable the introduction of CIL to be undertaken in parallel with the review of the Local Plan.*" (SPD paragraph 1.3) It is therefore reasonable to assume that the CIL will be integrated with the Local Plan and that infrastructure to accompany development will be largely funded through this mechanism.

The Government's current review of CIL should result in improvements to the way CIL operates. This is likely to make its introduction more attractive to Warrington Borough Council.

The Community Infrastructure Levy enables Warrington Borough Council to obtain contributions towards infrastructure from all development in its area, irrespective of its geographic proximity to the infrastructure being delivered. This renders it unnecessary to concentrate development geographically in order to fund key infrastructure projects.

The Preferred Development Option is silent on this key point. It is important to openly acknowledge that the CIL mechanism means that distributed development around the borough would provide the new roads and river crossings sought by Warrington Borough Council.

The funding of infrastructure is a key consideration in evaluating the alternative options and this should be reflected in the Council's Sustainability Appraisal and in its final decision on what is the most appropriate strategy when considered against the reasonable alternatives, based on the evidence (NPPF paragraph 182).

The Sustainability Appraisal inadequately considers the contribution that different options are capable of contributing to infrastructure delivery, ignoring the findings of the Warrington Viability Review (July 2017), despite the fact that infrastructure delivery is a crucial part of the objectives of the Plan.

The Warrington Viability Review (July 2017) assesses incremental growth in outlying settlements as being capable of providing a surplus of £31,512 per dwelling towards infrastructure, while an urban extension of around 1,400 dwellings could provide an estimated £23,665 towards infrastructure. On these figures, incremental growth spread across the borough is preferable.

The Council's assessment of alternative options should be revisited to ensure that infrastructure delivery and impact on commuting & congestion are properly considered.

Question 7

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

Response:

We strongly object to the Council's Preferred Option for the Main Development Locations, which concentrates development to the south of Warrington in the proposed Garden City Suburb and South West Urban Extension. This unnecessarily concentrates development in a limited number of locations, which dramatically reduces the choice and competition in land, driving up prices for developers.

The Council claim that this will encourage infrastructure delivery, but in reality mechanisms such as the Community Infrastructure Levy can collect contributions from developments all over Warrington Borough Council's area and pool these contributions to provide shared infrastructure. It is unnecessary to geographically concentrate development in order to achieve the Council's stated aims of providing new infrastructure.

A wider range of locations will drive competition and enable higher levels of developer contributions to infrastructure as a result. This is best achieved through Option 5.

Option 5 (dispersed development) has been incorrectly assessed in relation to its ability to deliver infrastructure, for the reasons set out in our response to question 6. Option 5 has major environmental benefits in terms of maintaining the strategic role and permanence of the Green Belt. It also has significant environmental benefits, including reducing in-commuting pressure and minimising congestion with associated positive impacts on air quality.

Question 8

Do you have any comments to make about our Preferred Development Option for the City Centre?

No comments at this stage, but we reserve our right to comment at Final Plan stage.

Question 9

Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?

No comments at this stage, but we reserve our right to comment at Final Plan stage.

Question 10

Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?

No comments at this stage, but we reserve our right to comment at Final Plan stage.

Question 11

Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?

Response:

The Garden City Suburb runs the risk of putting too many eggs in one basket. This is highly risky when the economy needs to remain flexible and able to respond to a variety of business needs. The M56 is not ideal for all businesses. Reliance on a limited number of landowners reduces competition and limits the options open to businesses. In turn this increases the likelihood that companies will search further afield and locate in competing boroughs' areas.

The National Planning Policy Framework requires flexibility, stating: "*Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances*" (NPPF paragraph 21).

This is particularly important when considering Green Belt land release, as it is necessary to consider the permanence of the Green Belt boundaries lasting well beyond the plan period. The Garden City Suburb does not provide enough flexibility for the plan period and 10 years beyond, to 2047.

In light of these considerations, it is important to provide a mix of sites of different sizes, landowners and locations. Option 5 is preferable for this reason.

Question 12

Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

Response:

No comments at this stage, but we reserve our right to comment at Final Plan stage.

Question 13

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

The New City concept should embrace the constellation of outlying settlements that are already in its orbit, with the Development Plan indicating how smaller settlements' relationships with the New City will be developed. They are an important part of the New City growth concept.

There is already a strong link between Winwick and the main urban area along the A49 corridor, with four bus services providing six buses an hour (bus nos 19, 22, 329 and 360). Winwick's links to the New City should be embraced as part of the development strategy.

Winwick has successfully had development in the past, on the site of the former hospital. This success story can and should be repeated. The plan's aspirations for very limited growth at Winwick is unnecessarily constrained.

Question 14

Do you agree with our approach to providing new employment land?

We strongly disagree with the approach of concentrating new employment land in only 3 locations, namely junction 9 of the M56, Warrington Waterfront, and at Omega. It is essential that businesses have a variety of sites & locations, as one size does not fit all.

The A49 is an established corridor that is perennially popular with employers. It has good public transport links and offers an alternative to Omega. The EDNA notes that Winwick Quay is a Key/Flagship area (EDNA p179) which is a prime site for local and inward investment. However the Plan in its current format does not provide any land for the expansion of Winwick Quay. This is a major omission.

Land is available and highly deliverable immediately adjoining Winwick Quay, north of junction 9 of the M62. Please see the accompanying Planning Promotion Documents for land west of Delph Farm (37.6 hectares) and land east of Newton Road (7.5 hectares).

The Local Plan will be more resilient if it included a wider range of locations for employment land. It should include a wider variety of employment allocations of different sizes, in a mix of locations, to provide choice and competition in the market.

Question 15

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?

No comments at this stage.

Question 16

Do you agree with our suggested approach for dealing with Minerals and Waste?

No comments at this stage, but we reserve our right to comment at Final Plan stage.

Question 17

Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?

Please see our accompanying site specific submissions for two employment land sites at Winwick, namely:

- ***Land east of A49 Winwick Road, Winwick***
- ***Land off Delph Lane, Winwick.***