

Warrington Borough Council  
Planning Policy and Programmes  
New Town House  
Buttermarket Street  
Warrington  
Cheshire  
WA1 2NH

28<sup>th</sup> September 2017

Dear Sir/Madam,

**RE: WARRINGTON LOCAL PLAN PREFERRED DEVELOPMENT OPTION PUBLIC CONSULTATION, REPRESENTATIONS ON BEHALF OF BARRATT DAVID WILSON HOMES NORTH WEST**

This representation has been prepared by Barton Willmore on behalf of our Client, Barratt David Wilson Homes North West (the Client) and provides comments on the Preferred Development Option of the Warrington Local Plan.

Our Client has land interests within the Garden City Suburb and is actively promoting this site for residential development. For reference, a Site Location Plan is submitted alongside this representation.

**Background**

The Preferred Development Options consultation provides the first opportunity to review and comment on Warrington Borough Council's ("the Council") proposed development to meet the strategy identified development needs up to 2037, and follows on from the scoping exercise undertaken in late 2016.

The need for a new Local Plan follows a successful High Court Challenge to the Core Strategy housing requirement, which resulted in this being quashed. Whilst remaining parts of the Core Strategy continue to form part of the statutory development plan for Warrington, there is no up-to-date housing requirement. The absence of a housing requirement within Warrington represents a significant challenge to the plan making and decision-taking process, as well as to securing the economic growth aspirations of the Council (threatening the sustainable development of the Borough). The adoption of a new housing requirement is therefore urgently required.

As part of the Local Plan Review process, the Council has produced a broad range of evidence which includes an up-to-date assessment of housing need, an up-to-date assessment of urban land capacity, a Green Belt Assessment, and settlement specific proformas.



### Housing Requirement

Since the start of this consultation, the Government has signalled its intentions to change the approach for calculating housing needs. Applicable from April 2018, the basis for housing requirements would be standardised utilising the most recent DCLG projection adjusted for evidence of affordability. The timescales of the Warrington Local Plan Review mean that it will be subject to the standardised approach should this be adopted by the Government. It must however be noted that this methodology does not set a ceiling for local planning authorities to plan to. Rather it forms the basis to plan from. Paragraph 46 of the Methodology consultation paper reflects this outlining that policy makers may advance a housing requirement which reflects economic growth ambitions which would otherwise be above the level provided for through the standardised methodology. As a result the pursuit of an economic led housing requirement remains consistent with Government policy.

The proposed housing requirement of 1,113 dwellings per year reflects a “policy-on” position which is considered to be supportive of the Cheshire and Warrington LEP Devolution Bid. The housing requirement is 158 dwellings in excess of the current level of objectively assessed housing need as identified within the Council 2016 SHMA and subsequent addendum.

Our Client is supportive of the Council’s positive approach to defining its housing requirement. The adoption of this housing requirement will provide for a significant boost to housing delivery consistent with Paragraph 47 of the National Planning Policy Framework (NPPF). It is responsive to assessed demographic and economic needs and will increase the amount of affordable housing which could be delivered across Warrington over the Plan period and has been derived to support the delivery of the Council’s pro-growth economic ambitions.

Our Client fully supports the pro-growth approach of the Council and believes that the adoption of this as a basis for the housing requirement is critical in ensuring the effectiveness of the Local Plan in the achievement of the Council’s ambitions for the Borough. It is important therefore that this pro-growth approach is retained through to the submission version of the Local Plan Review.

The Council should however ensure that the housing requirement is referred to and treated as a minima taking into account evidence that even the adoption of a policy-on position within Warrington may not support the level of job growth experienced within Warrington within the recent past. As a result provision over and above the requirement of 1,113 dwellings per year should be allowed by the Council and not deducted from future supply calculations.

### Spatial Approach

Our Client is supportive of the Council’s acknowledgement of the need to review and release land from the Green Belt in order to secure the delivery of its identified housing requirement. This follows an assessment of the urban capacity of the Borough, and recognition that some brownfield sites within the borough do not provide viable and/or suitable locations for housing. Beyond the built up areas of Warrington there is a severe shortage of undeveloped land which is not designated as Green Belt. The release of land from the Green Belt to meet identified housing needs is therefore justified.

An urban centric approach is adopted by the Council in meeting its future housing needs with 15,429 or the 24,774 dwellings identified as part of the supply to be delivered at “urban” locations. This amounts to 62% of the land provision made within the Plan. It is noted that of this brownfield provision, a large proportion will be delivered within the earlier part of the plan period. Beyond extant planning consents, the achievement of this could prove challenging given that many of the sites identified as part of this process are subject to active uses, face significant infrastructure requirements, are subject to complex landownerships and/or must be radiated prior to the

development of housing. Should sufficient greenfield provision not be made by the plan within this earlier period, the Council will quickly face a housing shortfall, threatening the delivery of employment aspirations, and increasing affordability pressures. A balanced supply of greenfield and brownfield sites is therefore required throughout the plan period.

### Strategic Locations

A large proportion of future growth needs is to be met at four strategic sites. These are identified as being Warrington City Centre (for 3,526 dwellings), the Waterfront (for 4,032 dwellings), the Garden City Suburb (for 7,274 dwellings), and South West Warrington (for 1,831 dwellings).

Of the above sites, our Client notes and supports the identification of the Garden City Suburb as a strategic location for new housing. As outlined previously, our Client has land interests within the Garden City Suburb which they are promoting for residential development. Our Client is confident that the Site is developable for housing. The Site is available now and is being promoted by a well-known national housebuilder with a strong record of housing delivery. Subject to the site's release from the Green Belt, the Site is deliverable within the next five years, with no other constraints to development known beyond its current policy designation. The release and identification of our Client's land interest within the Garden City Suburb will therefore assist the Council in strengthening its short term housing land supply position, providing a buffer should delivery at brownfield sites not be as forthcoming as currently envisaged by the Council.

Our Client supports the identification of the Garden City Suburb as a strategic development site, noting that the Site:

- As a whole, represents an obvious and unique opportunity within the Borough to deliver a large proportion of future development needs with a sustainable extension to the existing settlement, with scope for new services and infrastructure, a district centre, and green infrastructure;
- Is relatively free from constraints which would preclude development. Constraints which are known to affect the area can be designed around and/or mitigated for;
- Scores low in the Green Belt Assessment for its role and function in maintaining the Green Belt;
- Forms part of the original New Town Plan for Warrington. Accordingly there has been a previous acceptance in principle of the suitability of this area for development;
- Is in close proximity to the strategic employment hub identified within the consultation document near to the M6/M56 interchange and represents the Council with the next "Omega" like employment land opportunity. The location of a large proportion of growth near to this location will therefore help reduce the need for car journeys to and from the Site in accessing employment;
- Is accessible to the Town Centre and existing public transport corridors promoting sustainable travel; and
- Is subject to active promotion for residential and commercial uses demonstrating its availability for development over the Plan period.

It is evident that in order to secure the full delivery of this strategic site (and overall housing requirement) within the Plan period the Council is reliant on a high rate of delivery (peaking at 522 dpa within the Garden City Suburb alone). The trajectory for the Garden City Suburb outlines that delivery is also expected within the first five years of the Plan period. To maximise the prospect for the achievement of this rate of delivery the Council should:

- Minimise the scope and number policy burdens and guidance connected to the design and development of the Site which might lead to significant increases in cost, introduce technical complexity, and/or delay delivery;
- Ensure as far as possible that policy informing the development is produced upfront as part of or alongside the Local Plan minimising future delay if to be relied upon ahead of delivery;
- Seek to minimise as far as possible the need for the strict phasing of the Site to encourage site wide delivery;
- Minimise the need for triggers within the development which might delay delivery;
- Establish a straightforward and robust framework to secure the delivery of sufficient funds required for site wide infrastructure;
- Be prepared to deliver strategic infrastructure such as new roads, sewerage, communications, schools and the District Centre; and
- Allow for flexibility in policy requirements should viability or the market be demonstrated to have altered during delivery or subsequent to the adoption of the Local Plan.

Whilst the adoption of the above measures will provide assistance to housing delivery at strategic sites, there will nevertheless be a need to provide for sufficient flexibility within the overall supply in excess of the proposed housing requirement. This will ensure that the Local Plan is sufficiently responsive to future changes should delivery rates at any of the strategic locations fall below that which is currently anticipated within the housing trajectory and would see a housing requirement not being delivered in full within the Plan period.

At present 10% flexibility is built into the proposed supply in contrast to an annual requirement for 1,113 dwellings. There are however a number of uncertainties evident within the supply.

Plans for the City Centre strategic site show that this is made up of a wide collection of land parcels extending over a large part of the town centre. Bringing forward this site as envisaged will represent a challenge to the Council, and subject to the interests of individual landowners and businesses. It is therefore unclear whether the 3,526 dwellings identified for this area will be delivered in full within the Plan period.

The Waterfront site relates to land adjacent to the River Mersey and to the west of the town centre. This land is largely subject to flood risk and due to its largely former industrial use will require extensive land remediation works to ensure that it is suitable and safe for accommodating new homes. This will take time and investment, increasing the cost and complexity of bringing the Site forward for development. In addition, the consultation document makes clear that the development of the Waterfront site is reliant upon the delivery of the Warrington Western Link Road. The Warrington Western Link remains at an early stage of the development process and is yet to benefit from planning or full funding. Its delivery is likely to be costly and technical given the need to bridge the Manchester Ship Canal, the Western Mainline, and the River Mersey. The tied delivery of this the Waterfront to this road link raises significant questions as to the deliverability of this site as outlined by the Council within their housing trajectory.

#### Small Sites Allowance

The supply also includes a small sites allowance of 1,740 dwellings. Delivery from these sources is uncertain especially given that the assumed rate is based on a period where supply on wider sites within the Borough was less forthcoming promoting the commercial attractiveness and market demand for such sites. These conditions are unlikely to be carried forward into the new Local Plan given the significant supply to be provided through the adoption of the Local Plan. Furthermore the inclusion of small sites allowance for the first five year period means that there is potential for double counting in reference to extant planning permissions.

### Flexibility

It is noted that further flexibility is claimed by the Council to have been already provided within the housing requirement, with a 5% buffer provided on top of the assessed housing need. Our Client disputes this approach, given the earlier reference within Paragraph 2.9 of the Local Plan which outlines that 1,113 dwellings per year is required to support the Cheshire and Warrington Devolution Bid. The full delivery of 1,113 dwellings per year is therefore critical in supporting the full delivery of the economic aspirations of the Council.

In view of the above, our Client considers that it would be prudent for the Council to identify and allocated further sites. Some further flexibility could be achieved at the Garden City Suburb by treating the overall capacity for this site as a minimum and allowing provision over and above this figure.

### Summary

Overall our Client welcomes the positive progress made by the Council in advancing their Local Plan to the Preferred Approach stage. Our Client is supportive of the proposed housing requirement of 1,113 dwellings which help will support the delivery of LEP led devolutionary economic aspirations. Our Client agrees with the need for a review of the Green Belt at Warrington in order to meet this need in full, and is supportive of the Garden City Suburb as identified within the consultation document.

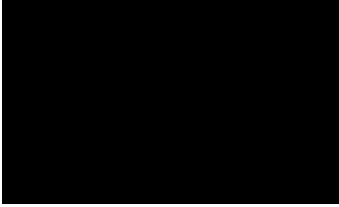
The proposed strategy places significant reliance on brownfield delivery in earlier years of the Plan. Our Client is concerned this strategy risks shortages in housing land supply given the constraints and complexities such sites are known to face. The Council should seek to balance its greenfield and brownfield supply throughout the plan period.

To ease delivery at the Garden City Suburb the Council will need to be flexible in its approach to policy, financial, phasing and infrastructure requirements. However, even with these measures in place, securing the full delivery of the strategic sites identified within the Local Plan will prove a significant challenge, and one which will ultimately only be eased through the identification of a varied portfolio of additional sites specifically orientated to areas away from the South and Central parts of the Warrington Urban Area to boost delivery and promote market choice.

Accordingly, whilst our Client welcomes the Preferred Approach, the proposed housing requirement, and identification of the Garden City Suburb as a strategic site for housing, it is clear that in order to secure the full delivery of the housing requirement, additional allocations are required.

We would like to thank the Council for the opportunity to submit comments to the Preferred Development Option of the Local Plan, and we look forward to commenting on the next iteration of the Local Plan. Should you wish to discuss the content of these representations any further please do not hesitate to get in touch.

Yours sincerely



Enc: Site Location Plan

