

Our Ref: 358SBCGWARR

By post and email: localplan@warrington.gov.uk

Local Plan, Planning Policy and Programmes
Warrington Borough Council
New Town House
Buttermarket Street
Warrington WA1 2NH

13 June 2019

Dear Sirs

Re: Proposed Submission Version Local Plan, March 2019: Representations by Satnam Millennium Ltd. Peel Hall, Policy MD4.

On behalf of Satnam Millennium Ltd we herewith submit representations to the Proposed Submission Version Local Plan, March 2019. Please take these representations as going to the Soundness of the plan.

Satnam Millennium Ltd is the owner of the Peel Hall land to which these representations relate.

The representations comprise the following,

- a. Statement by Satnam Planning Services Ltd, setting out the representations on a policy by policy basis.
- b. Report by Lichfield's regarding OAN and 5-year supply matters.
- c. Report by Highgate Transportation regarding highways and access matters.
- d. Report by Appletons regarding Green Belt and Site Assessment matters.

The Representations set out the plan is not Legally Compliant nor Sound.

We wish to be present at the Examination into this plan and participate orally, as the issues raised are fundamental to the plan and its soundness.

Please note these representations are submitted in written form, not via the online portal form.

Please register these objections and issue the appropriate reference numbers in due course.

Many thanks.

Yours faithfully



Colin Griffiths BA (Hons) MRTPI
Managing Director
Email: colin@satnam.co.uk

■

STATEMENT

Warrington Proposed Submission Version Local Plan, 2017-2037, March 2019

Representations on behalf of Satnam Millennium Ltd,

Peel Hall, Warrington

SECTION 1

1.1 This statement sets out the representations to be made to the Submission plan by Satnam Millennium Ltd. These representations conclude the plan is in many respects,

1. Not Legally Prepared,
2. Not Positively Prepared, and
3. Not justified.

1.2 We consider, for the reasons set out in the following sections of these representations that **the plan needs to be reconsidered and a fresh Submission version prepared**. There is a substantial risk of the plan being quashed if it is submitted and subsequently adopted in its current form. The extent of alteration required in order to make the plan sound is too great and not appropriate for the Modifications process following Examination.

SECTION 2

Not Legally Prepared

- 2.1 The plan is supported by a defective Sustainability Appraisal (March 2019).
- 2.2 The plan itself sets out at paragraph 3.3.16/17 that a range of options have been considered for the expansion of the main urban area and these were, at least in part, consulted upon. No similar exercise has been undertaken for the smaller settlements. This is an omission from the plan and goes to the adequacy of the plan strategy and how that has evolved being informed by SA of reasonable alternatives.
- 2.3 The SA focuses for the most part on the high level growth options, each of the options including the Garden Suburb in one shape or another. Options for growth which do not include the Garden Suburb were not tested. As such, since a “*reasonable alternative*” is without doubt a range of options alternative to the Garden Suburb, the SA has failed to address reasonable alternatives.
- 2.4 The range of issues included in the SA is not comprehensive and omits matters the council are now considering “*essential*” for the proper consideration of Peel Hall (impact of illegal access being removed by development on public health concerns and more). The SA of the plan should be comprehensive and consider all the main issues that may impact as a result of the allocations being proposed. At present it fails to do so based on the council’s latest thinking on this issue.
- 2.5 The SA was presented with the proposed distribution of development in the outlying settlements, and not given the opportunity to assess the impacts (see paragraph 2.10) of higher numbers in the smaller settlements and less in the Garden Suburb (for instance). Further at paragraph 6.1.2 the SA refers to a binary choice of brownfield land within the urban area or green belt release: there is of course a whole range of open space sites within the urban area which have not, as a result, been assessed.
- 2.6 Furthermore, the testing of the options has not extended to air quality and traffic impacts in the centre of Warrington arising from these various options, as this has yet to be adequately modelled and tested.
- 2.7 Sites within or adjacent to the smaller settlements were assessed and sieved, prior to SA testing, on the basis of the Green Belt assessment, undertaken previously, which is flawed and makes erroneous conclusions about site locations and impacts. As such the SA has not had the opportunity to assess fairly and comprehensively the impacts of the full range of sites available for development in the smaller settlements. As such the SA is partial and not reliable in this respect.
- 2.8 The plan is also supported by a defective Viability Appraisal (March 2019). This report admits it is a “*snap-shot of viability based on current anticipated number of dwellings*” (1) and that

“further viability testing is required as the plan making process advances and site constraints and opportunities continue to be better understood” (6).

- 2.9 On that basis we note the following apparently unreliable evidence used in the report.
- a. Residential values at Peel Hall are benchmarked as higher than Warrington Suburbs, and only 7% less than the proposed Garden Suburb in south Warrington. There is no indication where Warrington Suburbs are located. But Peel Hall is surrounded by areas with the highest levels of urban deprivation (multiple indices), whereas south Warrington is affluent and with much higher house prices. This requires further analysis.
 - b. Rental values for business and retail floor space is treated as the same figure, regardless if it is located in the south (Garden suburb) or north (Peel Hall). This will not be the reality, and this requires further analysis.
 - c. Investment yields are similarly treated in all parts of Warrington, again this will not be the reality. This requires further analysis.
 - d. On site infrastructure and utilities are assessed as being much higher for Peel Hall than other sites, see table 4.2.6. the same for S106 and CIL costs. This should be reassessed based on the agreed S106 package and site related matters.
 - e. The resultant sensitivity tables are without weight and should be reassessed. It is unclear whether Peel Hall should be classed as being within Inner Warrington (see other representations), if so, then the 20% affordable housing is relevant.
- 2.10 The plan is supported by a defective Green Belt Assessment, prepared over the period 2016-2019. This assessment has used inaccurate and ill-founded base information and considerations and thus its findings are unreliable and unsound. A consideration of this assessment is contained in the Appletons report attached to these representations.

SECTION 3

Not Positively Prepared

- 3.1 The plan makes insufficient provision for housing needs within the plan period, see attached Lichfield's report in that regard.
- 3.2 The plan is reliant upon large development areas in south Warrington coming forward following extensive infrastructure which is not approved / costed or funded at this time. Such reliance is not appropriate for a major component of a local plan. The viability appraisal which seeks to demonstrate the proposals is not reliable.
- 3.3 The plan faces largescale and well-grounded opposition to the scale and location of green belt release, especially in south Warrington. It is not appropriate for the plan to proceed on the basis of providing insufficient provision for housing in any event, compounded by a reliance on sites that may, through force of opposition and future versions of this plan, not materialise.
- 3.4 The plan is not clear and precise in the wording of policy. The policies are too long and contain unnecessary information and detail that cloud the intention of the policy.
- 3.5 Furthermore, the plan is overly negative and pessimistic regarding the development assumptions for Peel Hall (see paragraph 5.19 following).

SECTION 4

Not Justified

- 4.1 The plan makes overly negative assumptions regarding the development assumptions for Peel Hall, in contrast to the overly optimistic assumptions for the sites proposed for release from the Green Belt (see later).
- 4.2 The plan makes overly optimistic assumptions regarding infrastructure delivery necessary for the major development areas proposed as sites to be removed from the green belt. There are substantial unknown infrastructure matters that call the development of these sites as proposed in this plan into serious question.
- 4.3 The plan, for the first time in this submission document, proposes the allocation of various village sites to be removed from the green belt and allocated for housing. There has been no open or transparent weighing of the merits and public sentiment regarding other possible candidate sites. We feel this is not justified or fair to the residents of those settlements, nor to the promoters of other sites.
- 4.4 The evidence base supporting the sites proposed for release from the green belt is flawed, see the general chapters of the enclosed Appleton Report (site specific matters relating to Clay Lane Burtonwood are dealt with in separate representations). This evidence based needs to be reconsidered as part of a re-evaluation of the whole plan. This consideration and action needs to take place alongside a re-evaluation of the housing needs for the borough, see Lichfields Report.

SECTION 5

Individual Representations, Policy by Policy

5.1 In general we regard the wording of the policies of the submission plan to be **overly long, vague and imprecise**. Many of the matters raised are not required to be included in policy, as they are development control or minor matters that feed into the usual site development considerations that arise in any event. As a result the meaning of policy becomes lost or not instantly clear on reading the plan. As part of a re-evaluation of the plan wording should be tightened up and the meaning made clear. At present many of the policies are not positively prepared.

5.2 Plan Objectives

5.2.1 **W1**. The inclusion of the words *“through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of sustainable neighbourhoods”* is not required, this is a general policy setting out minimum growth targets for the plan period. Other detailed policies will deal with how this growth is to be achieved. These words should be deleted.

5.2.2 **W2**. We consider the plan does not maintain the permanence of the green belt in the long term, and safeguarded land is required. The Council’s reasoning as to why safeguarded land is not required is unconvincing (see later).

5.2.3 **W6**. Development and growth cannot make a contribution to improving Warrington’s air quality, this must be achieved through efficiency and technology. The test for development is not to make the current conditions worse (as set out in policy ENV8).

5.3 Main Map

5.3.1 The Main Map delineates the proposed allocation at Peel Hall with a yellow colour and notation (MD4). The extent of the allocation however is very precise, and includes areas of the surrounding roads, whilst removing land within the body of the site (Peel Hall Kennels, land at The Alders, and Radley Cottage). The boundaries of the notation is, quite simply, taken from the site plan submitted with a previous application. This level of detail is not required. By contrast the proposed Garden Suburb and South West Extension are shown as simple areas, with much less detail and precision. The notation for Peel Hall should be similar to the other growth areas.

5.3.2 The key should be expanded to include the land to be removed from the green belt in the smaller settlements.

5.4 Policy DEV1- HOUSING DELIVERY

- 5.4.1 The policy should make clear that the minimum housing targets are net (not gross) additions.
- 5.4.2 The wording for the current green belt sites proposed for development is not policy compliant. The Framework and its exceptions test requires clarity and certainty as to dwelling numbers that can be accommodated elsewhere so that the minimum amount of green belt land is required to be allocated. The continual use of the phrase "*minimum capacity of*" or "*minimum of*" leaves the question of what occurs if some of the allocations produce more dwellings than anticipated? Does this reduce the exceptional need for further development on former green belt sites or will it lead to provision over and above the OAN required to be met by the plan strategy? Whilst this may not in itself be a bad thing, that circumstance cannot be used as an "exceptional" reason why the green belt should be reviewed on this scale in this local plan. The capacity of the sites should be reviewed and assessed in a re-evaluation of the plan and positive and accurate development yields proposed.
- 5.4.3 The number of dwellings proposed for the outlying settlements (4) is arbitrary and not supported by the evidence base. These outlying settlements are sustainable in their own right and have sites that can produce more dwellings than postulated in the plan. Sites in the smaller settlements are able to produce homes quickly in the early years of the plan, without the massive infrastructure required by the major areas of green belt release proposed elsewhere in the policy. The distribution appears to be driven by the need for high development yields on the major green belt removal sites. This should be analytically re-assessed (also by SA).
- 5.4.4 A stepped housing trajectory is proposed. As set out elsewhere, this is not appropriate and more land capable of being developed in the early years of the plan period should be allocated.

5.5 Policy DEV2- MEETING HOUSING NEEDS

- 5.5.1 The differentiation between affordable housing rates for Inner Warrington and elsewhere requires assessment: there are other parts of the borough (close to Peel Hall for instance) where similar economic factors apply as exist in the town centre. It is not the case that Inner Warrington alone requires less affordable housing.
- 5.5.2 The policy is overly detailed regarding tenure split and provision on and off site. This plan is intended to endure for the period 2017-2037, so policy should not fix current requirements on matters that can easily change over the plan period. Simple wording requiring tenure to be provided in accordance with housing needs to be assessed at the time of the application / delivery of the site would be more appropriate.

- 5.5.3 The policy makes reference to Optional Standards, with regard to Building Regulation Standards. The policy should not be this detailed.
- 5.5.4 The policy makes reference to 20% housing for “*older people*” with no definition as to what this accommodation comprises nor who meets the definition of “*older people*”. Needs differ between “*older people*” now and will further evolve over the plan period. The policy should not be this detailed.
- 5.5.5 The policy makes reference to Self and Custom Build, with no reference to where or how this will be provided. Again the policy should not be this detailed, and a separate policy regarding Self and Custom Build accommodation should be provided.
- 5.5.6 There is a reference to “*other needs across the Borough*”, however there is no definition of what these other needs comprise, and no positive plan is made for the meeting of these needs. As such that part of the policy is not required.

5.6 Policy DEV4- ECONOMIC GROWTH AND DEVELOPMENT

- 5.6.1 The policy should not make a differentiation between local and wider strategic employment needs in this policy. It is unnecessary to do so.
- 5.6.2 Exceptional circumstances for the removal of land for employment development is not made with the same clarity that is attempted for housing development in the plan. This should be re-assessed.

5.7 GB1- GREEN BELT

- 5.7.1 The policy says the “*Council will plan positively to enhance the beneficial use of the green belt*”, with no indication as to how this can be achieved or what it includes. This should be deleted from the policy.
- 5.7.2 The sites proposed for release from the green belt at the outlying villages are seen here for the first time. Comments should be assessed on these proposals and a further submission plan then prepared that responds to these representations. As set out earlier, the evidence base and the process leading to the selection of these sites is flawed. To continue with this first choice with no re-assessment prior to submission is prejudicial to other sites at those villages and the local communities.
- 5.7.3 As a general comment, almost all the sites selected for release in the settlements to the north of Warrington (see Figure 6) are located away from the nearest points to Warrington. Yet Warrington is the main source of employment and facilities for these new homes. The policies which allocate them however, all emphasise the ease of which links to Warrington (its employment and facilities) can be made. This

demonstrates a re-assessment must be made, to properly assess sites closer to the urban area of Warrington, so as to reduce vehicle miles and to encourage walking and cycling wherever possible.

5.8 INF1- SUSTAINABLE TRAVEL AND TRANSPORT

The policy is long and overly detailed. Many of the points could be omitted as they relate to development control and / or good practice issues.

5.9 INF4- COMMUNITY FACILITIES

The references within this policy to Warrington Hospital are not necessary, beyond Point 3. Point 4 is meaningless and refers to a future review of the local plan. This should be deleted.

5.10 INF5- DELIVERING INFRASTRUCTURE

5.10.1 The list of *“appropriate matters to be funded by contributions”* is unnecessary and should be deleted. This is a matter for a specific SPD in due course.

5.10.2 The position on viability is noted, but again is too detailed for a local plan policy. This should be limited to a simple statement that viability of development proposals is for the applicant to demonstrate. Reference to the viability appraisal for the local plan is not justified, as this is a broad brush, not detailed appraisal of the various sites, and not currently appropriate for use in this way.

5.11 POLICY DC1- WARRINGTON’S PLACES

5.11.1 The policy should make clear that Peel Hall is located in Inner Warrington, the wards surrounding the site are listed as being inside the defined area. The criteria for the designation of Inner Warrington are not set out and clear.

5.11.2 The list of matters set out in 2 are replicated from other local plan policies and should be deleted from this policy.

5.11.3 The reference to the Central Area Neighbourhood Board masterplan is unnecessary and uses phraseology that will be out of date once the master plan has been produced. It adds nothing to the policy and may be made into an SPD or Neighbourhood Local Plan in the fullness of time.

5.11.4 The remainder of the policy is overly long and detailed, with little of policy substance. This should be deleted.

5.11.5 Paragraph 8.3.9 refers to the Greater Manchester Wetlands Nature Improvement Area (NIA), and is shown on the proposals map (figure 13). This area extends for

much of built Warrington and Peel Hall. The policy should be clear as to its intent and influence in that regard. It is not justified at present.

5.12 DC5- OPENSOURCE, OUTDOOR SPORT AND RECREATION PROVISION

5.12.1 Again the policy is overly detailed and should be simplified, much of the content could be expressed in supporting text rather than policy. Contributions for playing pitches should refer to family dwellings only.

5.12.2 The references to *"indoor sport and recreational facilities"* is unspecified and vague, this needs to be clarified in the text or in an SPD as to what it entails.

5.12.3 Part 7b of the policy goes beyond the requirements of paragraph 97 of the Framework by requiring *"at least the same quantity, quality and accessibility to its catchment population, community benefit and management level is made in a suitable location"* and part c in that it requires surplus facilities to be *"not capable of helping to meet any of Warrington's recreation standards"*. These comments should be deleted from policy and the requirements of the Framework paragraph 97 inserted.

5.13 DC6- QUALITY OF PLACE

Again this policy is overly long and detailed. Many of the comments could be usefully put into supporting text rather than policy. There is repetition, for instance Points 1a and 1f refer to the same DC requirements to ensure neighbourly development relations. Many of the points are encapsulated in policies elsewhere in the plan.

5.14 ENV3- SAFEGUARDING OF MINERALS RESOURCES

The policy should make clear that the allocation at Peel Hall and the surrounding built up areas are removed from this policy; at present it is not clear.

5.15 ENV7- RENEWABLE AND LOW CARBON ENERGY DEVELOPMENT

5.15.1 Point 1 of this policy is meaningless, it states there is a presumption for low carbon proposals *"provided they satisfy the requirements of other relevant local plan policies and would not result in unacceptable harm to the local environment"*. It adds nothing as a presumption, and therefore should be deleted or the policy wording amended.

5.15.2 Point 6 of the policy is overly long and detailed and should be reduced to state the aim of achieving low carbon developments, with an SPD or similar produced to consider this issue in greater depth.

5.16 Policy MD1- WARRINGTON WATERFRONT

There are great uncertainties and infrastructure requirements to be overcome for this site to be brought forward (see useful summary at 10.1.10). As such housing on this site as proposed in the local plan is uncertain. As such, more housing sites and Safeguarded land is required to ensure sufficient flexibility in the plan exists.

5.17 Policy MD2- WARRINGTON GARDEN SUBURB

There are great uncertainties and infrastructure requirements to be overcome for this site to be brought forward. As such housing on this site as proposed in the local plan is uncertain. As such, more housing sites and Safeguarded land is required to ensure sufficient flexibility in the plan exists.

5.18 Policy MD3- SOUTH WEST URBAN EXTENSION

There are great uncertainties and infrastructure requirements to be overcome for this site to be brought forward (see useful summary at 10.3.7). As such housing on this site as proposed in the local plan is uncertain. As such, more housing sites and Safeguarded land is required to ensure sufficient flexibility in the plan exists.

5.19 Policy MD4- PEEL HALL

5.19.1 We support the allocation of this site for 1,200 dwellings within the plan period. The site is available, deliverable and viable. Development is able to start on early phases as soon as planning permission is achieved, we anticipate in 2020, with a start on site 2021. As the plan sets out the site *“performs well in terms of the assessment against the objectives of the Local Plan (see above), the requirements of the Government’s NPPF and the Local Plan’s Sustainability Appraisal.”*

5.19.2 The proposals for Peel Hall are negatively phrased when compared to the other allocated sites, yet those sites are to be removed from the green belt and Peel Hall is located within the urban area (see paragraphs 10.4.6 & 10.4.10) and compare this with the language used to assess the transportation impacts of the Warrington Garden Suburb, a some 4 times larger development. Also, see the Delivery Partners note, *“Private Sector Stakeholders”* not as set out for the other sites *“developers promoting land within the urban extension”*. This should be revised in the re-appraised document.

5.19.3 The policy is long and overly detailed, and much of the content could be transferred to supporting text or omitted from the plan as it refers to usual DC related requirements.

5.19.4 The supporting text is contradictory and seeks to prevent any development until the mitigation package for the whole scheme is agreed. This is not required; other

policies of the plan require mitigation on a phase by phase basis. In the light of the extreme housing shortage this should be the approach here on this non-green belt urban site. The attached report from Highgate Transportation sets out how the development of the site can begin in advance of a complete mitigation strategy coming forward if necessary.

- 5.19.5 The policy should refer to a “*minimum of 1,200 new homes*” to add clarity and be positively prepared.
- 5.19.6 The Peel Hall site has an already agreed package of social and community benefits set out in a S106 agreement, the policy seeks to go beyond this (with no change in circumstances to justify the change). This should be re-assessed.
- 5.19.7 The site, as the Council knows, will be brought forward via a planning application based on a master plan approach agreed with the Council. The policy should set this agreed approach out, not refer to another delivery method (MD4.2).
- 5.19.8 The amount of Affordable Housing on the site is dependent upon local housing needs arising from its location at least adjacent to if not located within, Inner Warrington. It has been endorsed that some of the affordable housing from this site could be provided meaningfully off site in the Town Centre. There is no necessity to change that position in policy.
- 5.19.9 The development of this site is not an Urban Extension; it is a site within the urban area already.
- 5.19.10 The policy is overly detailed requiring the use of a particular Transport Model for the preparation of the TA. This may in time change, and policy should be flexible to accommodate this.
- 5.19.11 There is no evidence to substantiate the claim that the area to the south of the Peel Hall site has “*low traffic characteristics*”. The area is, according to the Council, congested at certain times, and so a description such as this in policy is misleading and unnecessary.
- 5.19.12 There is no requirement for site investigation work pre-planning application stage, this is a green field site and the usual conditions can be imposed in due course. This should be deleted.

5.20 Policies OS2/3/9 LAND ALLOCATIONS

All these developments will put additional pressure onto J9 of the M62. This must be taken into account in any mitigation scheme agreed for the M62 junction 9. The plan should set out the requirement for a mechanism for the non-green belt site at Peel Hall and these sites

to share the costs of that mitigation scheme. This is an omission from the plan and must be rectified in a re-appraised plan.

Warrington Local Plan

Proposed Submission Version Local Plan

Representations on Housing Matters

Satnam Millennium Limited

June 2019

LICHFIELDS

LICHFIELDS

Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places
for over 50 years.

lichfields.uk

© 2019 Nathaniel Lichfield & Partners Ltd, trading as Lichfields. All Rights Reserved. Registered in England, no. 2778116. 14 Regent's Wharf, All Saints Street, London N1 9RL
Formatted for double sided printing.
Plans based upon Ordnance Survey mapping with the permission of Her Majesty's Stationery Office.
© Crown Copyright reserved. Licence number AL50684A
41640/05/SPM/CR
17475692v6

Contents

1.0	Introduction	3
	Background	3
2.0	Critique of the Local Housing Need	5
	Introduction	5
	Calculation of the LHN	5
	Definition of the Housing Market Area	9
	Alignment with Economic Growth	10
	Conclusions on Housing LHN	15
3.0	Analysis of the Forward Supply of Housing	17
	Introduction	17
	Policy Context	18
	Housing Supply	19
	Components of Supply	21
	Local Plan Housing Trajectory	25
	Conclusions	28
4.0	Affordable Housing	29
	Introduction	29
	Affordable Housing Requirements	29
	Affordable Housing Need and the Link to the Housing Requirement	30
	Peel Hall	32
	Conclusion	32
5.0	Conclusion	34
	Tests of Soundness	34
	Recommended Changes	35

Tables

Table 2.1 Warrington Net Population Growth 2017-2037	12
Table 3.1 Housing Delivery Test Measurement for Warrington Borough	21
Table 3.2 Deliverable Supply of Housing Land	21
Table 3.3 HLS - Sites with Planning Permission	22
Table 3.4 HLS – Large Sites without Planning Permission	22
Table 3.5 Recommended Site Lead in Times	24
Table 3.6 Supply of Housing Land – incorporating the Urban Capacity Assessment to 2037	26
Table 3.7 5-Year Land Supply Scenario (SHLAA 2017)	27

1.0 Introduction

- 1.1 These representations have been prepared by Lichfields on behalf of Satnam Millennium Limited [Satnam]. They form part of Satnam’s response to the Warrington Local Plan [WLP] Proposed Submission Version covering Local Housing Need, housing land supply and affordable housing. They are submitted to Warrington Borough Council [WBC] for consideration in the formulation of its new Local Plan for the Borough.
- 1.2 Satnam has reviewed the WLP and the associated evidence base including the Warrington Local Housing Needs Assessment [LHNA] (prepared by GL Hearn in March 2019) and welcomes its preparation. In particular, several tweaks to the methodologically approach to calculating Local Housing Need [LHN] are supported, specifically the move to align housing needs with economic growth, although as we will set out we have concerns about the methodology underpinning this analysis.
- 1.3 There representations are submitted in the context of Satnam’s interest at Peel Hall (Policy MD 4.1), located to the south of the M62 and east of the A49. As such, these representations are primarily focused on housing matters and specifically those elements of the Local Plan and associated evidence base which relate to housing and economic growth. In particular, three issues are analysed:
- 1 The soundness of the LHN;
 - 2 The adequacy of the housing supply position; and,
 - 3 The need for affordable housing.

Background

- 1.4 By way of context, an outline planning application for a new residential neighbourhood, comprising: up to 1,200 residential units; retail units; a public house; employment facilities and a primary school was submitted to the Council by Satnam in July 2016 (LPA Ref: 2016/28492). This application was subsequently refused planning permission in February 2017, whilst an appeal into that refusal was recently dismissed in December 2018 (PINS Ref: APP/M0655/W/17/3178530).
- 1.5 Satnam fully supports the inclusion of the Peel Hall site in the Council’s 2018 SHLAA (SHLAA Ref 1506) and its inclusion as a housing-led mixed-use allocation for around 1,200 new homes in Policy MD4 of the emerging Local Plan. However, Satnam fundamentally disagrees with the supporting text to this Policy, which states that:
- “As there is no agreed package of transport mitigation measures, the Council has re-classified the Peel Hall site from ‘deliverable’ to ‘developable’ in its SHLAA. The Council has not therefore included any completions from the site within the first 5 year period of the Plan’s housing trajectory.”* [paragraph 10.4.11]
- 1.6 As set out in the accompanying Transportation Technical Note produced by Highgate Transportation (reproduced in Appendix 1), Satnam contests this finding and considers that the site is capable of delivering new housing in the first five years of the Local Plan, and that there are no grounds from departing from the Council’s previous position, set out in the (previous) 2017 SHLAA, that the site can deliver residential development in the first 5 years (2017-2022) of the Local Plan.
- 1.7 In the context of the soundness tests of the Framework [paragraph 35] Satnam contends that the classification of the Peel Hall Site as ‘developable’ is not justified by robust

evidence; is not effective because the site is deliverable within the first 5 years of the Plan; and is not consistent with national policy as it delays the release of a sustainable site for residential development which will contribute to acute housing needs in the Borough. The developer considers that the site is suitable, available and achievable for residential development at the earliest possible stage and there are no impediments to delivery once planning permission has been granted.

- 1.8 Furthermore, Satnam considers that Policy DEV1, which sets out the Borough’s housing requirement as a minimum of 18,900 new homes (945 dpa), also risks being found unsound as it is not positively prepared, justified or effective. Nor is it consistent with the national policy of significantly boosting the supply of homes.

2.0 Critique of the Local Housing Need

Introduction

- 2.1 The Warrington Local Plan Core Strategy [WLPCS], adopted in July 2014, sets out the Council's vision, aims and strategy for the Borough, including the overarching planning policies that will guide growth during the period to 2027.
- 2.2 However, in February 2015 the High Court quashed parts of the Warrington Local Plan Core Strategy, specifically:
- 1 Policy W1 and Policy CS2, and specifically to "*delivering sufficient land for housing to accommodate an annual average of 500 dwellings (net of clearance) between 2006 and March 2027, and a minimum of 10,500 over the whole period*"; and,
 - 2 Paragraph 6.38 relating to the delivery of "*1,100 new homes as a sustainable urban extension to West Warrington.*"
- 2.3 The Council has resolved to prepare a new Local Plan, rather than seek to alter the Core Strategy to resolve the issues raised by the High Court. As part of the formulation of the evidence base for the new Local Plan, the Council has reviewed its LHN using the standard methodology and alternative, employment-led approaches.

Calculation of the LHN

- 2.4 Satnam welcomes the LHNA's use of the 2014 Sub-National Population Projections [SNPP], the Sub-National Household Projections [SNHP] and the Mid-Year Population Estimates [MYE]. Furthermore, Satnam agrees with GL Hearn's revised methodology which does not seek to adjust the SNPP to take account of Unattributable Population Change [UPC], and to provide an uplift to counter falling household formation rates amongst younger households, and in particular to align with economic growth needs. Satnam considers that the Council's approach in respect of the calculation of LHN is, in general, positively prepared however, some concerns remain as we set out below.

Consideration of a different figure to the LHN generated by the standard method

- 2.5 Following the publication of the revised Framework in February 2019 a new standardised methodology for calculating housing needs has been formally introduced:

"To support the Government's objective of significantly boosting the supply of housing, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay" [§59]

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." [§60]

2.6 LHN is defined in Annex 2 of the Framework as follows:

“Local housing need: the number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework).”

2.7 Following the publication of the updated Framework, the section of the Planning Practice Guidance [PPG] addressing the calculation of LHN was updated on 19th February 2019.

2.8 The PPG now states that the Framework expects strategic policy-making authorities to follow the standard method for assessing LHN. This uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply¹. This uses the 2014-based household projections to calculate the projected average annual household growth over a 10-year period and adjusts them based on the affordability of the area. A cap may be applied which limits the increase, depending on the current status of relevant policies for housing.

2.9 The PPG states that:

“The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.”²

2.10 If an authority uses a different method for calculating housing need the PPG sets out how this should be tested at examination:

“Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.”

“Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.”³

2.11 The PPG also sets out circumstances when it might be appropriate to plan for a higher housing need figure than the standard method indicates:

“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances

¹ 2a-002-20190220

² 2a-005-20190220

³ 2a-015-20190220

where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”⁴

- 2.12 Finally, the PPG summarises the approach that should be taken to analysing affordable housing needs. It clearly states that the resultant affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments:

“The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”⁵

- 2.13 The reference to uplifting the housing figures in the Plan to help deliver affordable housing need suggests that this is a component part of the calculation of the housing requirement, rather than the LHN.

- 2.14 It is against this policy context that the housing need for Warrington must be considered.

The Standard Methodology

- 2.15 The Government’s “*Response to the Technical Consultation on updates to national planning policy and guidance*” was published on the same day as the revised Framework (19th February 2019) and summarises consultation responses and the Government’s view on the way forward. This reinforces the direction of change the Government is following to deliver more homes.

⁴ 2a-010-20190220

⁵ ID: 2a-024-20190220

- 2.16 The response to the Technical Consultation in respect of the standard method for assessing housing need:
- 1 Confirms that the 2014-based data will provide the demographic baseline for assessment of LHN;
 - 2 Clarification through national planning practice guidance that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies a departure from the standard methodology; and,
 - 3 Review the formula underpinning the standard methodology with a view to establishing a new method that meets the principles in paragraph 18 above by the time the next projections are issued.
- 2.17 Applying this revised approach to the standard methodology would result in a LHN figure of **860 dpa** for Warrington Borough. This represents the minimum number of homes needed per year as set out in paragraph 60 of the revised Framework (February 2019).
- 2.18 This is calculated using the 2014-based household projections for 2019-2029, which equates to household growth of 751 per annum (7,510 over the 10-year period), plus a market signals uplift of 14.5%. This latter figure has been generated as follows, based on the most recent (April 2019) affordability ratio data for Warrington Borough:
- Median local workplace-based affordability ratio (2019) = 6.32
 - deduct 4 = 2.32
 - divide by 4 = 0.58
 - multiply by 0.25 = 0.145 (14.5%).
- 2.19 No cap is applied as the capped figure is greater than the minimum LHN figure.
- 2.20 The resultant 860 dpa figure is, however, lower than the **909 dpa** LHN figure GL Hearn has calculated for the local authority, which was based on a slightly higher level of household growth (7,92 households per annum [hpa] over 2017-2027) and a slightly higher affordability ratio (6.36 for 2017).
- 2.21 The reason for the apparent discrepancy is GL Hearn has used a start date of 2017, rather than 2019 for its analysis, which it justifies as follows:
- “The PPG advises that “the projected average annual household growth over a 10-year period (this should be 10 consecutive years, with the current year being the first year)” should be used. We have interpreted the “current year” as 2017 to align with the start of the plan period.” [paragraph 2.4]*
- 2.22 Given that the LHN was first calculated in March 2019 rather than back in 2017, we would infer that for the purposes of plan making, the ‘current year’ means 2019; it can only be ‘frozen’ for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination⁶.
- 2.23 **Nevertheless, as both GL Hearn and WBC have chosen to move away from the standard methodology calculation when defining the Borough’s LHN, this contentious element of the assessment is less relevant.**

⁶ 2a-008-20190220

Definition of the Housing Market Area

- 2.24 The Mid-Mersey SHMA (January 2016) defined the three local authorities of Halton, St Helens and Warrington as a self-contained HMA. The latest Local Housing Needs Assessment [LHNA] (March 2019) also identifies Warrington as sitting within the Mid-Mersey HMA (Figure 1, page 6). The justification behind the delineation of the HMA is not repeated in the LHNA, which relies on the analysis of previous versions of the mid-Mersey SHMA.
- 2.25 Satnam disagrees with the assertion that the three Mid-Mersey Authorities form a self-contained HMA. It is considered that Warrington Borough in itself represents a self-contained HMA, and indeed has a stronger relationship with parts of Cheshire than it does with either St Helens or Halton.
- 2.26 As we set out in our previous representations on the emerging Local Plan, we reviewed GL Hearn’s *‘Review of Representations on OAN’* (May 2017) document and considered that it does not adequately demonstrate that Warrington should be considered part of a HMA with Halton and St Helens. The justification provided primarily focuses on refuting the connection between Warrington and Cheshire (Cheshire West and Chester and Cheshire East) rather than demonstrating an intrinsic relationship between Warrington, Halton and St Helens. An argument can be made that Halton and St Helens have close housing linkages and could be coupled together as part of an HMA but Warrington’s connection to both is much less obvious and demonstrable. Satnam is of the opinion, and considers that GL Hearn has not adequately demonstrated to the contrary, that Warrington Borough represents a standalone self-contained HMA for the reasons previously mentioned and reiterated below:
- 1 Migration flows suggest that Warrington displays a high level of self-containment and could be considered separate HMAs in its own right.
 - 2 Two separate LEP areas cover the three districts - the Liverpool City Region LEP covers Halton and St Helens; whilst Warrington is included in the Cheshire and Warrington LEP.
 - 3 The contextual house price and rental data which has also been used in an attempt to link the three districts together clearly demonstrates that Warrington operates in a very different market to both St Helens and Halton, and has significantly higher house prices and rental costs. Figure 1: Median House Prices (2016) in GL Hearn’s *‘Review of Representations on OAN’* demonstrates significantly higher house prices in Lymm when compared with the rest of Warrington, St Helens and Halton, but also the higher house prices in Warrington when compared to St Helens and Halton. The latest data from the Land Registry (June 2017) indicates that the average house price in Warrington (£178,297) is £52,905 higher than in St Helens and £45,515 higher than in Halton. Furthermore, Lymm accounts for only 5% of the total number of households in Warrington Borough⁷. As such, the higher house prices experienced here would be unlikely to disproportionately skew the overall figures in Warrington.
- 2.27 The information clearly points towards Warrington being a self-contained HMA in its own right, as it exceeds the CLG thresholds on both commuting and migratory self-containment, is located in a separate LEP area to St Helens and Halton and has very different housing market signals than those experienced in either district. Whilst recognising that there are linkages between the three authorities, all three have strong migratory and commuting relationships with other authorities in the sub-region, such as

⁷ Census 2011 – Lymm Ward

Warrington's relationship with Cheshire; St. Helens' and Wigan; and Halton with Cheshire West & Chester and Liverpool.

- 2.28 On this basis, it is imperative that all of Warrington's identified housing requirement is delivered within the Borough boundaries. A failure to do so could mean that there is a disconnect between where housing is provided, and where it is needed the most. Increasing the housing requirement in Halton or St Helens will not meet Warrington's LHN.
- 2.29 That said, this commentary is largely redundant as GL Hearn's latest LHNA states that because the local authorities are at different stages of their local plan preparation, the study's results are focused only on Warrington. This has been translated through into the emerging Local Plan.
- 2.30 Satnam supports Warrington's proposals to cater for its own housing need within its authority area.

Alignment with Economic Growth

- 2.31 The Framework [§81c] states that planning policies should “*seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment*”. **This retains the link between integrating economic growth and housing need.** There is a clear risk that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment.
- 2.32 To its credit, WBC's housing evidence base has sought to explore whether, in light of likely future job growth, there is likely to be a knock-on increase in the housing need for Warrington Borough (above that indicated by the demographic-led LHN generated by the standard methodology). However, we have some serious concerns regarding the approach followed and the resultant housing need identified.
- 2.33 Ensuring a sufficient supply of homes within easy access of employment opportunities represents a central facet of an efficiently functioning economy and can help to minimise housing market pressures and unsustainable levels of commuting (and therefore congestion and carbon emissions). If the objective of employment growth is to be realised, then it will generally need to be supported by an adequate supply of suitable housing. The challenge of meeting employment needs is clearly given great importance, and the Framework highlights this by stating that “*significant weight should be placed on the need to support economic growth and productivity*” [§80].
- 2.34 Fundamentally, the economic strategy that underpins WBC's Proposed Submission Version Local Plan appears to be flawed and poorly related to the housing need target. The reasons behind this conclusion are set out below.

Justification of the 945 dpa LHN

- 2.35 GL Hearn's LHNA (March 2019) examined the potential employment growth in Warrington Borough drawing on a range of datasets and reports to consider what level of housing would be required for forecasts to be met.
- 2.36 GL Hearn created a sensitivity to the former SEP level of growth recognising the reduction in the OE baseline forecasts. Their approach has been to apply an uplift of 319 jobs per annum to the new, lower 2018 OE baseline (635 jobs per annum).

- 2.37 The broad conclusions are that the OE baseline growth is likely to be too low (12,698 jobs over the 2017-37 period) and the SEP growth is likely to be too high (24,800 over the 2017-37 period). The adjusted SEP growth taking into account the lower baseline growth calculates an adjusted growth of 19,078 jobs over the 2017-37 period. GL Hearn estimates that the Standard Method housing need figure (909 dpa) could support around 16,200 jobs:
- OE 2018 Baseline: 12,698 jobs
 - LHN 909 dpa: 16,200 jobs;
 - **SEP Uplift: 19,078 jobs;**
 - Former SEP Growth: 24,800 jobs.
- 2.38 Translating this into housing need, GL Hearn made a number of assumptions relating to double-jobbing, commuting, economic activity rates, and household formation rates. The core analysis (SEP Uplift) identifies a housing need of 945 dpa, which includes a part return to trend household formation rates (increasing the need up from 907 dpa).
- 2.39 The LHNA report concludes that as the 945 dpa target associated with the SEP Uplift jobs target “*is above the standard methodology the Council should consider this level of growth in order to ensure the borough meets its economic potential while still improving local household formation rates*”. [page 22]

Critique

- 2.40 Lichfields has fundamental concerns with the approach taken by GL Hearn to define the LHN on a number of levels.
- Misaligned Population Growth*
- 2.41 The GL Hearn LHNA presents the anticipated population growth necessary to support its economic-led need of 945 dpa on page 21 of the report, and the comparable table for the 909 dpa LHN figure in Appendix 1 of its report. These are summarised in Table 2.1, alongside the age cohort growth in the 2014-based Sub-National Population projections, which underpin the standard method and should have formed the baseline for GL Hearn’s assessment.
- 2.42 The figures are peculiar in a number of ways. The most obvious apparent disparity is the difference in growth in the key labour supply age group of 15-64 year olds, who will form the vast majority of the labour force in the years to come. The 2014-based SNPP suggests that residents in this very broad age group will stay broadly the same over the next 20 years (+500), with the majority of population growth anticipated in the number of residents aged 65 and over.
- 2.43 In complete contrast, GL Hearn’s model conveniently increases this age cohort by 5,822 over the same time period, which is inconsistent given that they are apparently using the 2014 based SNPP for both scenarios. This increases to 7,530 for the SEP Uplift. However, the number of residents aged 65 and over stays very similar under all 3 scenarios, despite the 909 dpa scenario experiencing a 30.5% overall population growth, and the SEP Uplift scenario a 38.6% uplift from the 2014-based SNPP.

Table 2.1 Warrington Net Population Growth 2017-2037

	2014-based SNPP (792 dpa)	LHN (909 dpa)	SEP Uplift 945 dpa
Under 15	1,500	2,370	2,773
15-64	500	6,322	7,530
65 and over	20,000	19,889	20,039
Total	21,900	28,583	30,346
Net Job Growth	Not specified	17,800	19,100
Net increase in economically active residents	Not specified	15,152	16,200

Source: ONS 2014-based SNPP / GL Hearn LHNA (March 2019) / Lichfields Analysis

- 2.44 It is clear from this broad analysis that the assumptions underpinning the GL Hearn analysis are significantly over-inflating the age cohorts likely to comprise the bulk of the labour force in the years ahead, thus boosting job growth without a commensurate increase in housing need.
- 2.45 There are likely to be a number of explanations behind this flawed output:
- 1 **Unrealistic assumptions concerning unemployment:** the methodology assumes that the number of people unemployed in 2017 remains the same moving forward to 2037. This means that because the population increases by 14.5% under the 945 dpa scenario, the **proportion** of people unemployed must decline significantly. In the year to December 2017, unemployment was 3.7%^a in Warrington Borough, which is the lowest total since March 2006 and is significantly below the regional and national average rates (4.0% and 4.2% respectively), suggesting there is limited scope for further reductions. Furthermore, the latest unemployment rate for the Borough in 2018 has actually increased, to 4.0%. This suggests that GL Hearn's assumption is not robust and is artificially inflating the workforce.
 - 2 **Flawed Economic Activity Rates:** Regarding economic activity rates, the LHNA uses activity rate changes forecast by Experian as opposed to rates produced by the OBR and Oxford Econometrics. Satnam objects to this approach. Satnam considers that the economic activity rates published by the forecasting houses cannot be applied outside of their specific models, since they are influenced by all of the assumptions made about population, jobs, unemployment and commuting rates within the model. A more appropriate and robust approach would be the application of fixed economic activity rates based upon the local economic context and robust assumptions about future change, supported by external data sources such as OBR. This may again have the effect of increasing the housing requirement to meet the requisite job target.
- 2.46 Given that the vast majority of the over 65s are likely to be leaving the workforce, or at least winding down towards retirement, it is unclear how Warrington's population will possibly accommodate a net employment growth of 19,100 over the same time period. GL Hearn suggests that those aged 65 and over will work beyond this age when the opposite is likely to be true. It is more likely that people in this age bracket will be looking to retire at that point in their lives or work a reduced number of days/hours as they edge towards retirement.

^a Source: ONS Population Survey, model-based unemployment

2.47 To get the figures to work, it appears that the LHNA has made unrealistic assumptions about increasing economic activity levels and productivity. Table 2.1 (above) clearly demonstrates an obvious flaw with GL Hearn’s modelling, namely that the net job growths projected for both the LHN (17,800) and SEP Uplift (19,100) are completely out of step with the growth in the labour force.

2.48 **The fundamental flaw in GL Hearn’s modelling is this: a growth of 7,530 residents aged 15-64 cannot support an increase of 16,200 economically-active residents, much less 19,100 jobs.**

2.49 Even if all 4,200 residents currently registered as unemployed⁹ re-enter the job market, we still cannot square the circle.

2.50 The Framework is clear that housing should not be a barrier to economic growth. It is therefore essential that sufficient housing is provided in order to accommodate an increase in the workforce. If this provision is not made, the likely outcome is an increase in commuting into Warrington from outside of the Borough. In order to ensure that sufficient housing is provided, the employment and economic growth assumptions used in the LHNA should be based on robust, realistic and transparent evidence, which is not currently the case.

Alignment with the Employment Land Requirement

2.51 Satnam welcomes GL Hearn’s aspiration to align the housing requirement with job growth to ensure sustainable development over the course of the plan period. As set out above, the LHNA (March 2018) considers a number of economically driven housing needs scenarios. Satnam considers that the use of the LEP Uplift Scenario, although an improvement on the previous iteration of the SHMA, over the Past Trends Scenario is a flawed approach as it sits well below the historic job growth figures for Warrington and is essentially planning for an economic contraction rather than a continuation of Warrington’s strong economic performance. Applying the LEP Uplift appears modest in the contest of Warrington’s long-term average annual employment growth of 36,100 (1,641 jobs annually) between 1996 and 2018 (see Table 41 of WBC’s *Update to the Economic Development Needs Assessment 2019*) some 72% above the SEP Uplift scenario advocated by GL Hearn.

2.52 This is important, because GL Hearn dismisses the Past Trends scenarios out of hand in its LHNA. Presenting two scenarios in Table 2 of the LHNA, one examining job growth between the 2 peaks (1997-2008), with a job growth of 2,175 annually, and one from the two troughs, at 1,466 jobs annually. Even the latter figure is significantly higher than the SEP Uplift scenario of 955 jobs annually that has informed the LHN.

2.53 GL Hearn justify their decision to disregard the past trends job forecasts on the grounds that:

“The 1997-2010 period was one of very strong growth connected to the digital economy, internet shopping, the expanding public sector under the previous Labour Government. More locally strategic growth in Warrington including the development of Birchwood Park and the significant amount of jobs brought with it. It also includes other strategic growth including University Campus, a new intensive care unit and hospital wing at Warrington Hospital and Warrington Interchange.

⁹ Source: ONS Population Survey, model-based unemployment Jan 2018-Dec 2018

More widely changes in the world economy (slowing of Chinese Economy, American isolation policies) and national economy (Brexit and continued austerity) are likely to slow the future rate of growth in comparison to historic rate. Extrapolating these levels of growth is there not reflective of a realistic level of growth a view shared by the leading economic forecasters.” [paragraphs 3.16 to 3.17]

- 2.54 This may or may not be true; however, WBC has undermined this ascertain by seeking to plan for a level of economic growth that explicitly seeks to replicate the past trends that GL Hearn dismisses as being ‘unrealistic’.
- 2.55 The emerging Local Plan allocates 362 hectares of B-Class employment land over the 20-year Plan period 2017-2037 in Policy DEV4. The supporting text to this Policy explicitly states that:
- “in determining the amount of employment land needed for the Plan period, the Economic Development Needs Assessment (2019) concluded that the preferred forecasting method for establishing need, is a projection forward of past take-up rates that considers both strategic and local needs, resulting in a need of 362 hectares of employment land up to 2037”. [paragraph 4.2.13]*
- 2.56 Reference to WBC’s “Update to the Economic Development Needs Assessment” [EDNA] (February 2019), produced by BE Group with Mickledore, indicates that this need is based on historic (22 years) take up from 1996/97-2017/18 of 13.88 ha per annum, including Omega (see Table 43 of the EDNA). Table 41 of that report confirms that over that same time period, the Borough grew by 36,100 jobs, or 1,641 annually.
- 2.57 **Therefore, the Council’s own evidence suggests that they are planning for a level of employment land growth, at 362 ha, that in the past sustained 1,641 jobs annually – a figure more than 70% higher than the 954 p.a. job growth the 945 dpa figure equates to (Table 3 in WBC’s EDNA).**
- 2.58 It is also important to explore the employment land growth that the much lower OE baseline can sustain. The EDNA models the following job growth scenarios:
- OE Baseline – 14,480 net job growth. 41.68 ha B-Class need;
 - Sensitivity Test One SEP (Policy On): 24,885 jobs growth (10,405 above OE baseline). 46.42 ha B-Class land;
 - Sensitivity Test Two – Variation on the SEP: 19,080 jobs growth (equivalent to 945 dpa) equates to 19.98 ha additional land on top of the OE baseline (i.e. 61.66 ha).
- 2.59 Sensitivity Test 2 aligns with GL Hearn’s preferred LHN figure of 945 dpa.
- 2.60 Table 43 of the EDNA summarises the equivalent employment land requirements. Its methodology takes the net land need (i.e. 41.68 ha for the OE baseline), adds a 5-year buffer (10.42 ha for the baseline) and a 14.71 hectare allowance for business displacement associated with Warrington Masterplan projects. So, for the OE baseline scenario, the total employment land need equates to 66.81 ha. For the Sensitivity Test Two, this would equate to **91.79 ha** (i.e. 61.66 + 15.42 + 14.71).
- 2.61 The EDNA concludes that **362 ha is the objectively assessed need**, which equates to 20 years of past take up (at 13.88 ha), plus a 5-year buffer (69.4) and 14.71 ha for business displacement. BE Group’s justification for this is as follows:

“However, from the market assessment and reviewing the historic trends in employment change and land take up (along with uncertainties in long term forecasting generally) this approach suggests that employment land needs are underestimated. When a comparison of past employment change over the period 1996-2018 and 2000-2007 periods is made, actual land take-up is many times more than the estimate put forward by the growth only approach.

In conclusion, it is considered that the most appropriate forecasts are the two Take-Up Scenarios which look at local only and local/strategic needs. Within these two, the Local/Strategic Take-Up Model best reflects the full range of need Warrington is likely to have to 2037.” [paragraphs 6.87-6.88]

2.62 **Therefore, our clear conclusion is this – the Council’s employment land and housing targets are fundamentally misaligned. The 945 dpa housing target equates to just 92 ha of B-Class land, yet the Council’s is allocating 362 ha- a figure almost 4-times higher.**

2.63 Satnam is of the view that to address this misalignment, the Council should plan for a much higher level of housing growth that is more closely aligned with past trend job growth.

2.64 Unhelpfully, GL Hearn did not model the implications of a ‘past trends’ job growth scenario in its latest LHNA (March 2019). It was modelled as a scenario by GL Hearn in their previous Warrington Addendum to the Mid-Mersey SHMA Update (May 2017), which similarly relied on the 2014-based SNPP. That document calculated that, on the basis of past job growth of 1,623 annually, this would equate to a housing need of 1,332 dpa (Table 16 of the Mid-Mersey SHMA Update).

2.65 Satnam acknowledges that the derivation of housing need from employment land targets is a complex issue and not all of employment land need will be associated with job growth. However, the disparity between the preferred scenario employment land target of 92 ha and the employment land OAN figure of 362 ha is excessive.

2.66 It can only be concluded that an employment land OAN figure of 362 ha would sustain a level of job growth far in excess of the level proposed in the SEP Uplift scenario which underpins the housing requirement of 945 dpa. Therefore, Satnam’s issues with the previous iteration of the SHMA have not been appropriately address and we maintain that there is a disconnect between the employment land evidence and housing evidence which could lead to unsustainable outcomes including increased inward commuting and an exacerbation of the issues being experienced in the housing market.

2.67 It is our view that the housing target of **1,332 dpa** that was previously modelled by GL Hearn would represent a much closer alignment with the Borough’s future economic growth prospects and would more closely align with the B-Class employment land requirement.

Conclusions on Housing LHN

2.68 Satnam welcomes the changes in which GL Hearn has made to their methodology for calculating LHN in Warrington but considers that the methodology still contains a number of flaws. It is considered that Warrington represents a standalone HMA and evidence has been presented in this representation to demonstrate this.

- 2.69 Satnam considers that GL Hearn’s assertion that the employment-led LHN for Warrington Borough is 945 dpa is flawed and not appropriate. The 945 dpa aligns with an SEP Uplift scenario that appears flawed in methodological terms, and is entirely inconsistent with the approach taken for economic growth as set out in the EDNA. The Council has proposed a level of job growth that is well below what has been achieved in recent years and which is wildly inconsistent with the housing target and which could result in a number of negative externalities including unsustainable commuting patterns.
- 2.70 Satnam considers that a figure of 1,332 dpa, based on GL Hearn’s earlier modelling, would likely represent a closer alignment with the B-Class land target, and should be included in the emerging Local Plan.

3.0 **Analysis of the Forward Supply of Housing**

Introduction

3.1 As the Council will be aware, Satnam submitted a planning application (LPA Ref: 2016/28492) for the development of up to 1,200 residential units and associated facilities at a site known as Peel Hall in July 2016. The application was subsequently refused in February 2017 whilst an appeal into that refusal was recently dismissed in December 2018 (PINS Ref: APP/Mo655/W/17/3178530).

3.2 Satnam continues to maintain that the proposed development at the site is wholly deliverable and represents sustainable development. Satnam welcomes the inclusion of the site within the Council’s emerging Local Plan and 2018 SHLAA. However, as set out above we strongly disagree with the assertion that the site cannot deliver any units within the first 5 years (2017-22), which represents a shift in the Council’s conclusions from the 2017 SHLAA.

3.3 This is justified in the WLP as follows:

“As there is no agreed package of transport mitigation measures, the Council has re-classified the Peel Hall site from ‘deliverable’ to ‘developable’ in its Strategic Housing Land Availability Assessment (SHLAA). The Council has not therefore included any completions from the site within the first 5 year period of the Plan’s housing trajectory.” [paragraph 10.4.10]

3.4 Satnam strongly contests this. The Peel Hall site is not located within the designated Warrington Green Belt, is located within the existing urban area and the site is considered to be suitable, available and achievable. Furthermore, upon receipt of a planning permission on the site, Satnam will be marketing the site and based on our knowledge of the market it is considered that the site can easily deliver 110 units per annum once fully operational.

3.5 A Technical Note has been produced by Highgate Transportation on Satnam’s behalf and is Appended to this Technical Paper (see Appendix 1) to counter the issues raised by WBC on paragraph 10.4.10 of the WLP. The Technical Note states:

“Highgate Transportation are concerned that the plan is overly pessimistic regarding the time it will take to assess and agree the package of mitigation measures for the full development. The implication of the wording of the plan is that this will be protracted and this will therefore (unnecessarily) prevent new housing coming forward within the first five years of the Plan’s housing trajectory. The position in reality is that the Peel Hall site can and should remain with a “deliverable” classification.” [paragraph 3]

3.6 The Technical Note also provides evidence on Development Traffic Flows that demonstrate that they are:

“...of an order of magnitude that is more than capable of being easily assessed within a standard Transport Assessment or Transport Statement with supporting Travel Plan and mitigation measures. It is therefore proposed the Local Plan wording should be modified to allow the above quantum of development at each

access to come forward within the first five years provided they are supported by the appropriate assessment studies.” [paragraph 8]

- 3.7 In the context of the soundness tests of the Framework [paragraph 35] Satnam contends that the classification of the Peel Hall Site as ‘developable’ is not justified by robust evidence; is not effective because the site is deliverable within the first 5 years of the Plan; and is not consistent with national policy as it delays the release of a sustainable site for residential development which will contribute to acute housing needs in the Borough.
- 3.8 As we set out in the remainder of this Section on Housing Land Supply, it is vital that WBC acknowledges the deliverability of the Peel Hall site, as otherwise it cannot demonstrate a 5YHLS. As we will set out below, WBC cannot demonstrate a 5YHLS even when applying the most optimistic assumptions concerning the deliverability and availability of sites and backloading the housing requirement.
- 3.9 We will demonstrate that the Council’s housing requirement is flawed and mis-aligned with its economic growth objectives; that a 20% buffer needs to be applied due to the Council’s persistent under-delivery of housing over the past 3 years; that the Borough is overly-reliant on complex large Green Belt sites to deliver housing in the short to medium term (when the reality is that they will generally take longer to come forward); and that build rates, densities and lead-in times are over optimistic.

Policy Context

- 3.10 The Framework¹⁰ sets out the Government's intention to significantly boost the supply of housing. The focus of national policy is to ensure the delivery of housing and in that context the Framework advises that only deliverable sites should be included within the 5-year supply.
- 3.11 Annex 2 of the Framework provides an updated definition of what constitutes a ‘deliverable site’:
- “To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*
- a) sites which do not involve major development and have planning permission, and all sites with **detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years** (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has **outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.**” (Lichfields emphasis)*
- 3.12 Further guidance regarding what now constitutes both a ‘deliverable site’ and ‘clear evidence’ in the context of housing policy is contained in the PPG. ‘Clear evidence’ is required to demonstrate that completions will occur within the five-year period on sites

¹⁰The National Planning Policy Framework (February 2019): §59

with outline permission only, permission in principle, allocated sites, or sites on a brownfield register. Three examples are given by PPG¹¹ as to what this evidence may include:

- *“any progress being made towards the submission of an application;*
- *any progress with site assessment work; and*
- *any relevant information about site viability, ownership constraints or infrastructure provision.”*

3.13 The PPG¹² goes on to give some examples of clear evidence:

- *“a statement of common ground between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates.*
- *a hybrid planning permission for large sites which links to a planning performance agreement that sets out the timescale for conclusion of reserved matters applications and discharge of conditions.”*

3.14 Therefore, when assessing a 5-year housing land supply [5YHLS] position, it is important to be cautious in relation to the likelihood of sites delivering, and the scale of that delivery. This is because the purpose of the assessment is to provide a realistic view of whether there is sufficient land available to meet the community's need for housing.

Housing Supply

3.15 The Council’s evidence on housing supply is set out in the Warrington SHLAA 2018, the Urban Capacity Study 2019 and the Warrington Local Plan. This section sets out an initial review of the robustness of the Council’s assessment of its housing land supply and considers the extent to which a 5-year forward supply of housing land can be readily identified.

3.16 With regards to the 5YHLS, the Framework¹³ sets out that LPAs should:

“have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

specific, deliverable sites for years one to five of the plan period; and

specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”

3.17 Regarding LPAs maintaining supply and delivery of housing, it states that¹⁴:

“Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. LPAs should identify and update annually a supply of specific deliverable sites sufficient

¹¹ Practice Guidance - ID: 3-036-20180913

¹² Practice Guidance - ID: 3-036-20180913

¹³ Framework - §67

¹⁴ Framework - §73

to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- *5% to ensure choice and competition in the market for land; or*
- *10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
- *20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”*

3.18 The Framework¹⁵ provides an updated definition of ‘significant under delivery’ stating that this should be measured against the results of the Housing Delivery Test, with a 20% buffer applying where the results indicate that delivery was below 85% of the housing requirement over the previous 3 years.

3.19 Satnam would like to state at the outset that we do not agree that the figures contained in Appendix 1 of the emerging Local Plan as they do not all constitute deliverable sites in the context of the Framework.

Housing Requirement Figure

3.20 The Council considers that the housing requirement of 945 dpa as set out in the LHNA 2019 is the appropriate housing requirement for Warrington. Setting aside our issues with the housing requirement and assuming it will be found sound at examination, the Council requires a housing land supply of 20,790 units (including 10% flexibility) over the next 20 years.

3.21 Satnam considers that the Council’s housing requirement is flawed and a more appropriate housing requirement would equate to 1,332 dpa which would result in a housing requirement of **29,304 units** (including a similar 10% flexibility allowance).

Appropriate Buffer

3.22 The Framework¹⁶ states that from November 2018 the application of a 20% buffer will be measured against the Housing Delivery Test [HDT], the results of which were published in February 2019. An analysis of the data is set out in Table 3.1, undertaken in accordance with MHCLG’s (July 2018) Housing Delivery Test Measurement Rule Book.

¹⁵ Framework – Footnote 39

¹⁶ Framework - Footnote 39 to 73 c

Table 3.1 Housing Delivery Test Measurement for Warrington Borough

	2015/16	2016/17	2017/18	Total
Number of Homes Required	923	902	792	2,617
Number of Homes Delivered	595	492	359	1,446
2018 Measurement	55%			
2018 Consequence	20% buffer			

Source: MHCLG Housing Delivery Test 2019 and Lichfields analysis

3.23 Table 3.1 demonstrates that the level of delivery over the last 3 years (1,446 dwellings) amounts to just 55% of the actual requirement over the corresponding period. Taking account of the results of the Housing Delivery Test, a 20% buffer should apply to the assessment of five-year housing land supply.

3.24 Satnam accepts that the 2018 SHLAA was published before the Ministry of Housing’s 2018 HDT results for all local authorities in England. However, whilst the Submission Local Plan post-dates the publication of the HDT results and revised Framework in February 2019, it gives very little regard to the HDT, nor does it acknowledge that the 20% buffer should be applied in identifying its five-year supply of deliverable sites.

Components of Supply

3.25 In its SHLAA 2018, WBC sets out three components of housing land supply which it considers will come forward over the next five years. This comprises 'Large Sites with Planning Permission'; 'Large Sites without Planning Permission'; and 'Small Sites Allowance'. The Council considers that from these sources, a supply of 3,555 dwellings could be delivered over the next 5-years (SHLAA 2018 - Table 3.7).

3.26 The delivery rate of these sites for the individual years (exclusive of windfall) is summarised in Table 3.2.

Table 3.2 Deliverable Supply of Housing Land

	18/19	19/20	20/21	21/22	22/23	Total	Total as %
PDL	256	173	387	670	450	1,936	61.0%
GF	67	231	318	292	242	1,150	36.2%
PDL/GF	5	1	40	35	8	89	2.8%
Total	328	405	745	997	700	3,175	100%

Source: Warrington SHLAA 2018

3.27 However, in 2019 the Council published an Urban Capacity Statement which sought to update WBC’s assessment of housing capacity from the main urban area of Warrington and the outlying settlements that are inset from the Green Belt to accommodate new development. The assumptions in the SHLAA regarding net developable area ratios; build rates; lead in times; densities etc have been re-appraised again to ensure that they are up-to-date and take account of recent fluctuations in market conditions. This has informed the Proposed Submission Version WLP. As a result, the Council now considers that it has a total of 4,132 dwellings in the first 5 years (as set out in Table 1), comprising:

- 359 completions in 2017/18;
- 3,773 dwellings on urban sites.

3.28 Going forward over the entire Plan period, the Council now considers that it can deliver a total of 20,643 dwellings, of which 6,917 would be on Green Belt sites, with the remainder on Urban sites (see Appendix 1 to the WLP).

Sites with Planning Permission

3.29 Annex 2 of the revised Framework states that: “sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).”

3.30 The burden of demonstrating that these sites are not deliverable lies with the appellant following the revised definition in Annex 2 of the Framework. The 2018 SHLAA concludes that 46 large sites are considered deliverable and had a valid planning permission as of 1st April 2018, totalling 2,576 units; 992 in years 6-10; and 0 in years 11-15.

3.31 The sites deemed capable of delivering 2,576 dwellings over the next five years, are set out in Table 3.3.

Table 3.3 HLS - Sites with Planning Permission

	18/19	19/20	20/21	21/22	22/23	Total
Total	328	405	577	746	520	2,576

Source: Warrington SHLAA 2018

Sites without Planning Permission

3.32 In making their assessment of likely supply of sites without planning permission within the 2018 SHLAA, the Council had regard to the following large sites without permission at the base date, which they anticipate are capable of delivering 599 dwellings during the period 2018 to 2023:

Table 3.4 HLS – Large Sites without Planning Permission

	18/19	19/20	20/21	21/22	22/23	Total
Total	0	0	168	251	180	599

Source: Warrington SHLAA 2018

3.33 Whilst Satnam has not undertaken a detailed interrogation of the sites without planning permission, there is insufficient evidence in the 2018 SHLAA that they meet the more rigorous deliverability criteria. As there is a risk that these may not come forward as planned, the Council should err on the side of caution and exclude these from the supply, unless the clear evidence required by the PPG is now readily available. An alternative approach would be to apply a non-implementation percentage to the 599 figure.

Build Rates

3.34 The SHLAA 2018 methodology applies a variety of build rates across the different site sizes identified. Where up-to-date information regarding build rates has been provided by developers and/or landowners, this has been utilised.

- 3.35 Where this has not been available the build rates published in Table 2.3 of the SHLAA have been employed, namely:
- 1 Sites with fewer than 50 dwellings: 20 dwellings built per annum;
 - 2 Sites containing 50 - 150 dwellings: 35 dwellings built per annum; and,
 - 3 Sites with more than 150 dwellings: 55 dwellings built per annum.
- 3.36 We welcome the use of individual site circumstances where possible to provide the most accurate assessment of delivery. We also consider that the application of standard rates is acceptable in principle.
- 3.37 However, we disagree with some of the assumptions applied to derive the standard delivery rates. The Council has assumed a standard delivery rate of 20 dpa on all sites less than 50 dwellings. We consider that a delivery rate of 20 dpa on site of less than 50 dwellings is ambitious and should be reduced downwards in order to reflect the nature of the companies that deliver this size of site and the consequently low delivery rates.
- 3.38 A standard build rate of 15 dpa for sites between 30-50 units is considered a more reasonable average for sites of this size. We would also advocate creating a separate category for smaller sites of less than 20 units as the delivery on these sites is likely to be slower given the capacity of the smaller developers which usually pursue these sites. This is also important given the increasing emphasis that the Government are placing on smaller housebuilders to deliver housing. It is highly unlikely that a site of 20 units would be built out in a single year by a small developer.
- 3.39 WBC advocates the use of a standard build rate of 35 dpa for sites with a capacity of between 50 and 150 units. Again, it is considered that 35 dpa for this range is not appropriate and we would advocate that two alternative ranges are adopted.
- 3.40 Sites should be categorised into sites with capacity for 51-100 units and 101-250 units. From our experience, the standard build rate applied to sites with a capacity of 51-100 units should be 25 dpa. For sites between 101-250 units in size, the build rate should be 30-35 dpa. This is because sites of 51-100 units are built out at a slightly slower rate than larger sites and it is important for the Council to adopt a conservative approach to ensure their delivery trajectory is not over inflated.
- 3.41 Furthermore, most sites with a capacity of less than 250 units are build out by one developer and it is accepted that the HBF usually suggest that 0.5-0.8 dwellings per week (25 dpa-42 dpa) approximates to a reasonable delivery rate (per outlet). As such, a standard delivery rate of 30/35 dpa on such sites is conservative and appropriate.
- 3.42 Following on from this, WBC should revise their upper site size limit from 150 to 250 units. It is considered more likely that sites of 250+ units could be built out by a number of developers / outlets but should be assessed on a site-by-site basis. The Council assumes a delivery of 55 dpa on sites over 150 units but we consider this to be excessive as a standardised rule of thumb. In general, on sites between 150 and 250 units there will be a single developer and delivery is unlikely to reach 55 dpa. On sites between 250 and 500 units, delivery of 55 dpa should only be considered appropriate where there are at least 2 developers (or outlets). For sites over 500 units, there will generally be at least 2 developers and often 3 operating a number of outlets simultaneously. Market intelligence may be used to justify higher delivery rates on sites of sufficient scale (i.e. over 500 units) once operational.
- 3.43 Furthermore, in terms of the methodological assumptions applied to Green Belt sites over 2 ha, the Council have assumed an average net site area of 75% where no information is

provided by a landowner/developer. Satnam expresses concern in relation to the net site area assumption of 75%. In our experience, for sites up to approximately 500 units, a more conservative 70% net site area assumption should be applied given the quantum of infrastructure and open space provision which will be necessary in these strategic sites. For sites over 500 units, the net developable site area may be closer to 60% when adequate provisions for additional amenity space, onsite school provision and local services are accounted for. This revision could also affect the claimed deliverable supply.

3.44 Similarly, whilst increasing densities is very clearly a Government policy objective, Satnam considers that the figures set out in the Housing Trajectory appear to be an over-optimistic assessment of densities, particularly the 275 dpa that the Council has assumed can be achieved on selected Town Centre sites, and 130 dpa elsewhere in Inner Warrington.

Lead in Times

3.45 The 2018 SHLAA assumes that sites below 150 units with full planning permission will start delivering units after 1.5 years; sites with outline permission after 2 years; and sites without permission after 2.5 years. Larger sites with outline permission are projected to start delivering units after 3 years; and those without permission, after 4 years.

3.46 It is considered that the lead in times as proposed would be appropriate for all sites of less than 50 units. However, we would advocate that an additional 6 months is added to each category for all larger sites between 50 and 150 and the table in the SHLAA should be amended in line with Table 3.5.

Table 3.5 Recommended Site Lead in Times

Site Status				
Site Size	Under Construction	Full Permission / Reserved Matters	Outline Permission	Sites without Permission
Less than 50	None	1.5 years	2 years	2.5 years
50 - 150	None	2 years	2.5 years	3 years

3.47 It is considered that on larger sites over 50 units there are generally more complex issues to overcome which cause delays. For example, delays in the planning process (e.g. the approval of reserved matters and discharges of planning conditions) as well as the time taken to implement development (e.g. marketing land and completing land purchase; preparing detailed design for infrastructure; mobilising statutory utilities; and, commencing development) are particularly prevalent on larger sites. As such, a 'one size fits all' approach is inappropriate and there should be a differentiation between site sizes to make allowances for larger sites which come forward at a slower pace.

3.48 The lead in time proposed for larger sites is not reliable; does not accurately reflect the time take for the majority of sites to start delivering; and is consequently not appropriate for use as a standard average for calculating deliverable supply.

3.49 We also express a degree of caution in relation to applying a standard lead in time for all sites without planning permission. The Framework¹⁷ is clear that to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In addition, Annex 2 of the Framework states that

¹⁷ Framework – Annex 2

“where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

- 3.50 Therefore this is clear that an allocation in a development plan is not a pre-requisite for a site being deliverable in terms of the five-year supply.
- 3.51 As set out above, clear evidence is required to justify the inclusion of sites without permission in the 5YHLS, including a demonstration that the site is viable and a commitment from a developer that the site can be brought forward within five years.
- 3.52 The timescales for a site coming forward are very dependent on a number of factors such as the developer's commitment to the site and infrastructure requirements as an example. The standard lead in times should only be applied to sites where developers are actively pursuing development on the site and preparing the necessary planning application. The standard lead in time should not be applied universally and a degree of pragmatism and realism should be applied. Sites where developers have shown limited commitment should be pushed back in the delivery trajectory accordingly.

Local Plan Housing Trajectory

- 3.53 The Housing Trajectory and Stepped Housing Supply set out at Appendix 1 of the Submission Local Plan sets out WBC's current position on its housing trajectory of deliverable and developable sites. This assessment has been prepared following the revised Framework definition of 'deliverability' and the publication of the HDT results.
- 3.54 The Housing Trajectory suggests a total of 20,643 homes could be delivered over the plan period, of which 4,132 units would be delivered over the course of the first 5 years of the plan. The annual average delivery over the first five years of the plan is 826 dwellings, which equates to 87% of the 945 dpa LHN, and even below the stepped requirement of 847 dpa for the first 5 years. Satnam acknowledges that WBC has applied a stepped trajectory to its housing requirement, but is concerned that this serves only to push housing supply further back into the plan period.
- 3.55 The PPG¹⁸ sets out that:
- “A stepped requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to set out evidence to support using stepped requirement figures, and not seek to unnecessarily delay meeting identified development needs. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.”*
- 3.56 In this instance, WBC has applied a stepped trajectory to accommodate for the increased delivery later in the plan period of the Waterfront, South West Extension and Garden Suburb. However, Satnam consider it should WBC should seek to allocate more available and achievable sites earlier on in the Plan period, including Peel Hall. This will ensure that there is flexibility in the supply to ensure that the housing requirement can be met year on year and to account for any occasions where sites do not come forward as anticipated.

¹⁸ Practice Guidance - ID: 3-034-20180913

3.57 At present, the Council cannot demonstrate a 5YHLS even with a stepped trajectory of 845 dpa for the first 5 years (equal to 4,225), as Appendix 1 indicates that even if all the housing sites proceed precisely as planned, only 4,132 homes (826 dpa) are deliverable. It is therefore imperative that Peel Hall is included within the housing land supply as a sustainable site which can be delivered in the early part of the Plan period. This will also ensure that the plan is in accordance with the Framework’s objective to significantly boost the supply of housing through ensuring identified needs are met as soon as possible.

3.58 In particular, it is clear that whilst the Plan may not be reliant on Green Belt sites in the first 5 years, it is very reliant on the delivery of the WWDA South Extension, the Garden Suburb and other Green Belt releases from 2022/23 onwards. As can be seen from Table 3.6, of the 20,284-dwelling supply over the Plan period, over a third relates to Green Belt site releases. It is reliant on Green Belt strategic sites to make up the shortfall, which are unlikely to come forward in the short term. For example, it appears very optimistic that 36% of the 7,341 homes anticipated to be delivered in years 6-10 are likely to come forward from Green Belt releases.

Table 3.6 Supply of Housing Land – incorporating the Urban Capacity Assessment to 2037

	Years 1-5	Years 6-10	Years 11-15	Years 16-20	TOTAL
Urban Capacity	4,132	4,690	3,554	1,350	13,367
Green Belt	0	2,651	2,223	2,043	6,917
Total	3,773	7,341	5,777	3,393	20,284
% Green Belt	0.0%	36.1%	38.5%	60.2%	34.1%

Source: Warrington Urban Capacity Study 2019 Table 1 / Proposed Submission Version Warrington Local Plan, Table 1

3.59 We have not undertaken a detailed analysis of the sites and reserve the right to undertake this analysis as the Local Plan progresses.

3.60 Nevertheless, the results of the HDT indicate that WBC should apply a 20% buffer to the assessment of five-year housing land supply. This has not been included within the Submission Local Plan, which gives further weight to the argument that the authority cannot demonstrate a 5YHLS against the Local Housing Need. As set out above, we also disagree with many of the SHLAA’s assumptions concerning build rates and lead in times, which again reduces the five-year supply.

3.61 The Submission Local Plan (Appendix 1) sets out a Housing Trajectory and Stepped Housing Supply over the course of the Plan period. This indicates that 4,132 units can be delivered over the course of the first 5 years of the plan from sites within the urban area and on Green Belt sites. Applying a 20% buffer as per the HDT would suggest that a requirement of 5,082 is needed – a shortfall of 950 units, even if we were to accept all of the Council’s assumptions concerning deliverability (which we do not). This shortfall would increase to 3,860 if the LHN reflects a more realistic, economically-aligned, target of 1,332 dpa.

3.62 These calculations should not be interpreted as an acceptance on Satnam’s part that we agree with the Council’s assumptions concerning the deliverability of their forward supply. We have not undertaken a detailed analysis of deliverability and reserve the right to do so at a later stage in the process.

3.63 Furthermore, and as stated above, we also disagree with many of the SHLAA’s assumptions concerning build rates and lead in times, and we would again reserve the

right to revisit this assessment at a later date when further information has become available.

Table 3.7 5-Year Land Supply Scenario (SHLAA 2017)

Five Year Supply of Deliverable Housing Land	Council presumed 5YHLS position	Council presumed 5YHLS position (minus 599 units without pp)	Council presumed 5YHLS position with 1,332 dpa
Total Housing Requirement (2017-22)	5 x 847 dpa = 4,235	5 x 847 dpa = 4,235	5x 1,332 = 6,660
20% buffer (to requirement and backlog)	1,016	1,016	1,598
Housing Supply Required	5,082	5,082	7,992
Deliverable Supply	4,132	3,533	4,132
Surplus of Deliverable supply over supply required	-950	-1,549	-3,860
Number of Years Supply (Expressed as Years of Residual Requirement)	4.06 years	3.48 years	2.59 years

Source: Satnam Analysis

3.64 Bearing these caveats in mind, WBC’s position is as follows:

- @847 dpa and assuming no buffer (and accepting WBC’s supply calculations), the Council has an under-supply of 103 dwellings, and a 5YHLS of 4.88 years;
- @847 dpa and 20% buffer (and accepting WBC’s supply calculations), the Council has an under-supply of 950 dwellings, and a 5YHLS of 4.06 years;
- @847 dpa and 20% buffer (and accepting WBC’s supply calculations with the exception of the 599 units without planning permission at the base date), the Council has an under-supply of 1,549 dwellings, and a 5YHLS of 3.48 years;
- @1,332 dpa and 20% buffer (and accepting WBC’s supply calculations), the Council has an under-supply of 3,860 dwellings, and a 5YHLS of just 2.59 years;

3.65 The PPG sets out how local authorities can demonstrate that they have a confirmed 5YHLS as part of the plan examination¹⁹:

“The NPPF gives local planning authorities the opportunity to demonstrate a confirmed 5 year supply of specific deliverable housing sites. This needs to be done initially through the plan examination process, and may then be refreshed annually following adoption (provided the plan remains up to date), through the preparation of an Annual Position Statement. In both these circumstances, it will only be possible to establish a confirmed 5 year supply if an appropriate buffer has been applied and the authority’s assessment of its supply has been tested sufficiently through the examination or Annual Position Statement process.”

3.66 It is therefore Satnam’s position that WBC cannot demonstrate a defensible five-year housing land supply position at the current time and should explore every avenue available to increase the supply of housing in the short term.

¹⁹ Practice Guidance – ID3-049-20180913

Conclusions

- 3.67 Satnam considers that even under the most optimistic assumptions and using the lowest LHN, Warrington Borough Council cannot demonstrate a defensible five-year housing land supply position at the current time and should explore every avenue available to increase the supply of housing in the short term.
- 3.68 The figures suggest that Warrington should seek to provide sufficient land to accommodate 29,304 units assuming 1,332 dpa plus a 10% flexibility buffer. Even at the lower figure of 945 dpa, stepped at 847 dpa for the first 5 years, WBC runs the risk of not being able to demonstrate a suitable supply of housing land over the plan period.
- 3.69 The Peel Hall site is not located within the designated Warrington Green Belt, is located within the existing urban area and the site is considered to be suitable, available and achievable. The note prepared by Highgate Transportation and appended to these representations is clear that the Peel Hall site is capable of delivering new housing in the first five years of the Local Plan. The site should therefore be included within the Council's SHLAA as delivering units within the first 5 years (2018-23) with commencement expected onsite in 2022.
- 3.70 To help make the Council's Policies sound, Satnam requests that paragraph 10.4.10 of the WLP be deleted, and supporting text to Policy MD4 added, that recognises that the Peel Hall site is deliverable, and not just developable. The Housing Trajectory in the Appendix should also be amended to reflect the delivery of the first 120 units in 2022. This will help make the plan sound in respect of this Policy.

4.0 Affordable Housing

Introduction

- 4.1 The Practice Guidance²⁰ states that the total need for affordable housing should be identified and converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow. The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments:

"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."

- 4.2 It is against this policy context that the housing need for Warrington must be considered.

Affordable Housing Requirements

- 4.3 The LHNA (March 2019) has undertaken an affordable housing need calculation in line with the latest update to the PPG. The general methodology remains unaltered from the previous SHMA Updates.
- 4.4 The LHNA concludes that the net need for affordable homes is 377 units. This is surprising given that parts of Warrington have some of the highest house prices in northern England.
- 4.5 Satnam considers that it would be helpful and informative if the LHNA incorporated analysis of the Housing Register data into the modelling work, even as a sensitivity test. GL Hearn makes no mention of it in the LHNA, but had previously dismissed the use of the Housing Register data as a sensitivity because it is *"difficult to have confidence that the register is able to define an underlying need"*²¹. Satnam disagrees with this assertion and considers that the Housing Register data provides an important indication of the overall level of need in an area and is referenced as such in the Practice Guidance. For example for Warrington Borough, the 2017/18 Local Authority Housing Statistics Dataset suggests that as of 1st April 2018, there were 1,811 households on the housing waiting list in a reasonable preference category.
- 4.6 Furthermore, the decision to net off 90% of all owner-occupiers (reducing the 1,524 households estimated to be living in unsuitable housing down to just 152) from the backlog need on the basis that the vast majority will be able to afford housing once savings and equity are taken into account appears arbitrary and does not appear to be robustly evidenced. Households may have negative equity, or be trapped in smaller unsuitable accommodation and be unable to afford a larger, more suitable property.
- 4.7 Higher levels of backlog need suggest a higher level of affordable need, which risks under-estimating the true scale of affordability issues in the district and may justify a further uplift to the LHN.
- 4.8 In terms of the proportion of households living in unsuitable housing, GL Hearn's calculation works on the basis that 52.6% of existing households are currently unable to

²⁰ Practice Guidance - ID: 2a-024-20190220

²¹ Mid Mersey SHMA Update – Warrington Addendum, May 2017 §7.36

afford market housing (without a subsidy). This results in a backlog need figure of 1,198. However, when calculating the newly forming household need, GL Hearn has assumed that just 42.6% cannot afford a suitable home. Why this percentage would be lower than for existing households is unclear, particularly as GL Hearn go on to state that:

“The average income of newly-forming households is around 84% of the figure for all households. This figure is remarkably consistent across areas.” [paragraph 4.30]

4.9 In calculating relative affordability, the LHNA notes that the distribution of household income in Warrington *“has been based on ONS modelled income estimates, with additional data from the English Housing Survey being used to provide information about the distribution of incomes.”* [paragraph 4.15]. Ordinarily modellers obtain this data for the particular local authority involved, from a provider such as CACI or Experian. It is unclear whether the Income data is therefore specific to Warrington, or based on national income banding distribution from the EHS, which would be less robust.

4.10 On a similar level, it is clear that GL Hearn has not used up-to-date locally-specific data on calculating the main source of backlog affordable housing need, namely existing households living in overcrowded housing. Table 10 of the LHNA states that the main source for estimating the number of households in overcrowded housing was the 2011 Census, which is now 8 years out of date. GL Hearn state in Table 10 that:

“Analysis was undertaken by tenure and updated by reference to national changes (from the English Housing Survey).”

4.11 Again, this just applies national trends rather than explore Warrington’s housing market in detail and could under-estimate the true level of need in Warrington as a result, particularly given worsening house prices in the Borough in recent years. The report also notes that the income data it has been using has increased by 16% from the previous assessment [paragraph 4.17]. This is particularly impressive given that the previous SHMA was undertaken less than 2 years ago and represents a curiously high rate of income inflation that is unlikely to be replicated in many districts across the UK.

4.12 The LHNA’s affordable housing need estimate excludes the impact of Right to Buy, which will likely add to affordable housing needs (and for which an assumption could have been reasonably made).

4.13 The above means that in our view, the affordable housing need has not been properly established for the purposes of plan making. However, it at least serves to illustrate that the affordable housing need identified in the LHNA, at 377 dpa, must be seen as an under-estimate and in the context of how it then feeds into a planning judgement on the overall housing provision of the Plan, the affordable need should be applied as an absolute minimum.

4.14 Notwithstanding the aforementioned calculation issue as outlined above does correctly recognise that there is a considerable need for affordable housing provision in Warrington. Furthermore, GL Hearn recommends that the Council should seek to maximise the delivery of affordable housing in the Borough.

Affordable Housing Need and the Link to the Housing Requirement

4.15 Satnam considers that there is a significant existing affordable housing need in Warrington and this is backed up by the LHNA. It is imperative that this affordable housing need is met as soon as possible. Although we do not agree with GL Hearn’s

approach to calculating the annual affordable housing requirement, at face value the LHNA²² outlines that the level of affordable housing needed per annum is 377. This represents a significant increase on the 250 dpa figure in the 2017 SHMA, suggesting that the situation is worsening.

- 4.16 With regards to the incorporation of affordable housing needs into the total housing figures included in Local Plans, the PPG²³ sets out the following:

“The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.” (Lichfields emphasis)

- 4.17 The PPG therefore sets out that ‘*the total housing figures*’ are about much more than just demographic need and should consider how and whether affordable housing needs can be met. This is in the context that the Framework (at paragraph 62) requires LPAs to specify the type of affordable housing required where a need is identified.

- 4.18 The Barker Mills High Court judgment²⁴ considered uplifts to housing need to address affordable housing need in the context of a challenge to a Local Plan. The judgment, in the context of a Local Plan process, placed consideration of an uplift for affordable housing into the second of a two-stage process, the first being calculation of OAN and the second being a ‘policy-on’ adjustment (i.e. one that is made through the Local Plan process and thus not part of the OAN). The Jelson judgment²⁵ is also relevant in this context. In short, in considering the refusal of planning permission for housing, the Inspector in this case (as a matter of planning judgment), accepted the need for affordable housing to make up a necessary component of OAN for housing in the council's area, or in the context of the Barker Mill judgment, as part of the first stage calculation of OAN.

- 4.19 Both of these judgements were issued before the publication of the revised Framework in February 2019 and the revisions to the Housing Need Assessment section of the PPG (also in February 2019); however, the key paragraph of the PPG relating to the need to increase the total housing figures included in the plan where it could help deliver the required number of affordable homes²⁶, is almost identical to the previous iteration.

- 4.20 This issue is acknowledged by GL Hearn in its LHNA, which states that while the LHN should not be impacted by the need for affordable housing the local authority could consider a higher housing requirement when developing a Local Plan:

“The Council could be justified in increasing overall housing delivery to ensure the affordable housing need is met as best as possible. Indeed, any number above the standard methodology will also be delivering more affordable housing through developer contributions thus addressing this need sooner.” [paragraph 4.52]

- 4.21 GL Hearn concludes that the affordable housing need (377 dpa) delivered at a rate of 25% of all delivery would require a total delivery of 1,508, although they are quick to clarify that this is not likely to be deliverable or realistic.

²² LHNA (March 2018):Table 16: Estimated Annual Level of Affordable Housing Need – Warrington (2017-37)

²³ ID 2a-024-20190220

²⁴ Trustees of Barker Mills Estates & Test Valley Borough Council vs SoS for DLCC [2016] EWHC 3028

²⁵ ‘Jelson Ltd. v Secretary of State for Communities and Local Government, Hinckley and Bosworth Borough Council [2018] EWCA Civ 24’

²⁶ ID 2a-033-20190220

4.22 Nevertheless, the LHNA explores the scale of uplift that could be appropriate to address needs:

“However, the Council could still consider an increase to the OAN as per the PPG to deliver more affordable homes. There is no set methodology for how to do this, but other areas have used a nominal 5% or 10% uplift to the OAN when developing their housing requirement.

Given the affordable housing requirement in Warrington we have given consideration for such an uplift in Warrington if the 5% is applied to the OAN of 909 then we would arrive at a housing requirement of 955 dpa.

Ultimately this uplift above the standard methodology is a choice for the Council but a requirement of around 950 dpa would seem reasonable to examine and also aligns with the economic-led need.” [paragraphs 8.29-8.31]

4.23 The Council has ignored this debate and has retained the 945 dpa figure in its emerging Local Plan. Policy DEV2 – Meeting Housing Needs in the WLP states that residential developments of over 10 dwellings will be required to provide 20% affordable housing on sites within Inner Warrington and 30% elsewhere in the Borough and on all greenfield sites irrespective of their location. At a delivery rate of 25% therefore, this would result in 236 affordable units being delivered annually – around 63% of the actual level of need.

4.24 Clearly a further uplift to the LHN would be justified. Achieving the full affordable housing need would be challenging, given that at a very basic level this would equate to an overall need for 1,508 dpa (@25% affordable housing delivery). Whilst GL Hearn is correct in stating that there is no set methodology for increasing the LHN to deliver more affordable homes, clearly the aforementioned housing target of 1,332 dpa (which more closely aligns with past job growth trends and, by extension, WBC’s employment land requirement) would potentially generate 333 dpa, or 88% of the overall need (377 dpa). As such, Satnam would advocate that the very lowest housing requirement pursued in Warrington is **at least 1,332 dpa** to ensure the affordable housing need to addressed.

Peel Hall

4.25 Satnam disagrees with some elements of the affordable housing calculations adopted by GL Hearn in Warrington and considers that this may significantly underplay the true affordable housing need in the Borough. However, even setting this to one side, it is clear that it is a very significant issue which needs to be considered and addressed at the earliest possible opportunity. Satnam recognises the considerable affordable housing issues currently being experienced in Warrington and as part of their proposed development on the Peel Hall site, has committed to the provision of 30% affordable housing provision on the site. This would result in the delivery of **360 much needed affordable housing units** of an appropriate size, mix and tenure to meet local needs.

Conclusion

4.26 Satnam considers that the LHNA does not fully address all our concerns in relation to affordable housing which were set out in our earlier representations. As such, we maintain our objection to the methodology within the LHNA and in particular the calculation of actual affordable housing requirement to meet affordable need. Even taking GL Hearn’s figures at face value, this suggests that at least 377 affordable housing units are required annually to meet Warrington’s needs. This represents a full 40% of the

Borough's entire housing target (@945 dpa). GL Hearn acknowledges that the Council could consider a further uplift to the LHN to meet needs, but this recommendation has not been followed through by WBC.

- 4.27 The 1,332 dpa figure recommended in Section 2.0 above could deliver 88% of the affordable housing need, @ 25%. As such, Satnam considers that the LHN for Warrington should be increased to take account of this need.
- 4.28 Notwithstanding the aforementioned issues, it is generally accepted that there is considerable need for the provision of additional affordable housing in Warrington. The Peel Hall site can deliver an affordable housing requirement of 30% and can deliver affordable housing throughout the early phases of the development to help address the significant unmet need.

5.0 Conclusion

- 5.1 This report has critiqued the Council’s proposed LHN, analysed the forward supply of housing and assessed the level of affordable housing need in the Warrington Borough. The Council’s evidence base has been reviewed and potential areas of concern have been highlighted that will need to be addressed to ensure the new Local Plan is found sound at Examination.
- 5.2 Satnam welcomes the efforts being made by WBC to update their evidence and to pursue an employment-led LHN. Satnam would also like to support the inclusion of the Peel Hall site as an allocation within the Local Plan.
- 5.3 However, Satnam has serious concerns regarding how the Council’s LHN has been calculated. The 945 dpa figure would lead to a very significant disparity between the scale of housing provision and the employment land target of 362 dpa. An uplift to 1,332 dpa would more closely align with the scale of job growth achieved in recent years.
- 5.4 Satnam also strongly contests the Council’s view that the Peel Hall site is developable but not deliverable in the supporting text to Policy MD4. In the context of the soundness tests of the Framework [paragraph 35] Satnam considers that the classification of the Peel Hall Site as ‘developable’ is not justified by robust evidence; is not effective because the site is deliverable within the first 5 years of the Plan; and is not consistent with national policy as it delays the release of a sustainable site for residential development which will contribute to acute housing needs in the Borough. The developer considers that the site is suitable, available and achievable for residential development at the earliest possible stage and there are no impediments to delivery once planning permission has been granted.
- 5.5 As set out in this report and acknowledged in the Council’s evidence base, there is also a considerable need for the provision of affordable housing in Warrington. Satnam considers that the site can deliver a high proportion of affordable housing on the site, meeting the requisite policy provision. The provision of a high proportion of affordable housing in the early parts of the plan should also weigh in favour of the development of the site.

Tests of Soundness

- 5.6 Satnam considers that Policy DEV2 fails the tests of soundness because:
- 1 **It is not positively prepared:** Satnam considers that the 945 dpa figure should be higher for the reasons set out above and as such the housing requirement has not been positively prepared. Satnam agrees that the housing requirement should be aligned with economic growth, but 945 dpa cannot adequately sustain the level of jobs associated with the 362 ha employment land target. This is likely to equate to 1,332 dpa, not 945 dpa.
 - 2 **It is not Justified:** The development strategy fails to reflect the Council’s evidence base and account for growth aspirations as set out in the EDNA. The evidence as set out in the LHNA, and particularly the unrealistic assumptions regarding economic activity and unemployment, is not robust and there are inaccuracies that need addressing.
 - 3 **It is not effective:** It will fail to deliver much-needed housing in the early years of the plan and cannot meet affordable housing needs in full, a fact recognised in the LHNA. Even under the Council’s own supply calculations, with a 20% buffer it

cannot demonstrate a 5YHLS. Additional land should be identified in the Local Plan in the event that a proportion of the identified supply does not materialise as envisaged. This could be particularly pertinent on the larger strategic sites which can take significantly longer than usual to commence delivery.

- 4 **It is not consistent with national policy:** The policy fails to significantly boost housing land supply as required by the Framework; the Plan will not achieve a deliverable 5YHLS in accordance with §73.

5.7 Satnam also considers that Policy MD4 fails the tests of soundness because:

- 1 **It is not Justified:** The Peel Hall site is deliverable and should be brought forward in the trajectory as it can make a significant contribution towards meeting the housing requirement for the Borough.
- 2 **It is not effective:** Without the Peel Hall site it will fail to deliver much-needed housing in the early years of the plan and cannot meet affordable housing needs in full, a fact recognised in the LHNA.

Recommended Changes

5.8 In order to address the conflicts above and ensure that Policy DEV1 is sound, Satnam requests that the Council:

- 1 Reconsiders its LHN for the area, in the context of more realistic levels of jobs growth that are more closely aligned with the 362 ha B-Class land requirement.
- 2 Identifies additional housing land, particularly in the first 5 years of the Plan, to accommodate a housing requirement of around 1,332 dpa, not 945 dpa.

5.9 To help make the Policy MD4 sound, Satnam requests that paragraph 10.4.10 of the WLP be deleted, and supporting text to Policy MD4 added, that recognises that the Peel Hall site is deliverable, and not just developable. The Housing Trajectory in the Appendix should also be amended to reflect the delivery of the first 120 units in 2022. This will help make the plan sound in respect of this Policy.

Appendix 1: Highgate Transportation Technical Note

TECHNICAL NOTE

PROJECT: Peel Hall, Warrington

REPORT: 1901/TN/04 – Proposed Submission Version Warrington Local Plan 2019, Policy MD4 - Land at Peel Hall. Suggested Modifications to Allow Early Phased Implementation

DATE: May 2019

-
1. This Technical Note considers the implications of Local Plan Policy MD4 on the delivery and phasing of the 1,200 new homes on land allocated at Peel Hall. The current wording in Section 10.4 would prevent any new homes coming forward until a package of highway measures is agreed for the mitigation of the entire development (paragraph 10.4.6 and MD 4.2-5). Paragraph 10.4.11 states.

“As there is no agreed package of transport mitigation measures, the Council has reclassified the Peel Hall site from ‘deliverable’ to ‘developable’ in its Strategic Housing Land Availability Assessment (SHLAA). The Council has not therefore included any completions from the site within the first 5 year period of the Plan’s housing trajectory.”

2. Highgate Transportation considers that the site is capable of delivering new housing in the first five years of the Local Plan.
3. Highgate Transportation are concerned that the plan is overly pessimistic regarding the time it will take to assess and agree the package of mitigation measures for the full development. The implication of the wording of the plan is that this will be protracted and this will therefore (unnecessarily) prevent new housing coming forward within the first five years of the Plan’s housing trajectory. The position in reality is that the Peel Hall site can and should remain with a “deliverable” classification.
4. Details of the proposed phasing have previously been provided to the Council and accepted. This is based on a rate of 120 units per year for the main site. It has also been agreed with the Council that an opening year of 2022 is to be assessed.
5. Therefore, the proposed phasing of the Peel Hall development for 2022 and 2023 has been reviewed, as this coincides with the first five years of the Local Plan (2019-2023). The phasing for these first two years is set out in **Table 1** for each access serving the site during this time.

Table 1 – Indicative build out table

Year End	Number of Residential Units off Each Access								Cumulative Total
	Blackbrook Avenue		Poplars Avenue		Mill Lane		Birch Avenue		
	New	Cum.	New	Cum.	New	Cum.	New	Cum.	
2022	0	0	60	60	60	60	0	0	120
2023	40	40	40	100	40	100	20*	20	260

*in addition to the main site

6. It is proposed that the wording in the proposed submission version Local Plan 2019 associated with the Peel Hall site should be changed, so that by the end of the first five years (2023):
 - i. Up to 40 dwellings can be accessed from Blackbrook Avenue.
 - ii. Up to 100 dwellings and a 100 bedroom care home can be accessed from Poplars Avenue.
 - iii. Up to 100 dwellings can be accessed from Mill Lane.
 - iv. Up to 20 dwellings can be accessed from Birch Avenue.
7. In terms of peak hour traffic flows, this quantum of development would result in the following peak hour flows at each access.

Table 2 – Development traffic flows 2022

Access	Quantum of Development	AM Arrival	AM Departure	PM Arrival	PM Departure
Poplars Avenue (Central)	60 dwellings	14	31	29	18
Mill Lane	60 dwellings	14	31	29	18
Total		28	62	58	36
		90		94	

Table 3 – Development traffic flows 2023

Access	Quantum of Development	AM Arrival	AM Departure	PM Arrival	PM Departure
Poplars Avenue (Central)	100 dwellings	23	52	50	31
	care home	7	7	8	8
Mill Lane	100 dwellings	23	52	50	31
Mill Lane/Blackbrook Avenue	40 dwellings	9	21	5	12
Birch Avenue	20 dwellings	5	11	10	6
Total		67	143	123	88
		210		211	

8. From this it can be seen that the above development flows are of an order of magnitude that is more than capable of being easily assessed within a standard Transport Assessment or Transport Statement with supporting Travel Plan and mitigation measures. It is therefore proposed the Local Plan wording should be modified to allow the above quantum of development at each access to come forward within the first five years provided they are supported by the appropriate assessment studies.
9. The allocation also includes a local centre to serve the local neighbourhood. This will help reduce traffic impact outside the immediate area as existing local residents would visit this facility rather than travel further away as currently occurs. It is therefore also proposed that the Local Plan wording should be modified to allow the local centre to come forward within the first five year period (i.e. in 2023) provided it was supported by the appropriate assessment studies.

Bristol
0117 403 1980
bristol@lichfields.uk

Cardiff
029 2043 5880
cardiff@lichfields.uk

Edinburgh
0131 285 0670
edinburgh@lichfields.uk

Leeds
0113 397 1397
leeds@lichfields.uk

London
020 7837 4477
london@lichfields.uk

Manchester
0161 837 6130
manchester@lichfields.uk

Newcastle
0191 261 5685
newcastle@lichfields.uk

Thames Valley
0118 334 1920
thamesvalley@lichfields.uk

TECHNICAL NOTE

PROJECT: Peel Hall, Warrington

REPORT: 1901/TN/04 – Proposed Submission Version Warrington Local Plan 2019, Policy MD4 - Land at Peel Hall. Suggested Modifications to Allow Early Phased Implementation

DATE: May 2019

-
1. This Technical Note considers the implications of Local Plan Policy MD4 on the delivery and phasing of the 1,200 new homes on land allocated at Peel Hall. The current wording in Section 10.4 would prevent any new homes coming forward until a package of highway measures is agreed for the mitigation of the entire development (paragraph 10.4.6 and MD 4.2-5). Paragraph 10.4.11 states.

“As there is no agreed package of transport mitigation measures, the Council has reclassified the Peel Hall site from ‘deliverable’ to ‘developable’ in its Strategic Housing Land Availability Assessment (SHLAA). The Council has not therefore included any completions from the site within the first 5 year period of the Plan’s housing trajectory.”

2. Highgate Transportation considers that the site is capable of delivering new housing in the first five years of the Local Plan.
3. Highgate Transportation are concerned that the plan is overly pessimistic regarding the time it will take to assess and agree the package of mitigation measures for the full development. The implication of the wording of the plan is that this will be protracted and this will therefore (unnecessarily) prevent new housing coming forward within the first five years of the Plan’s housing trajectory. The position in reality is that the Peel Hall site can and should remain with a “deliverable” classification.
4. Details of the proposed phasing have previously been provided to the Council and accepted. This is based on a rate of 120 units per year for the main site. It has also been agreed with the Council that an opening year of 2022 is to be assessed.
5. Therefore, the proposed phasing of the Peel Hall development for 2022 and 2023 has been reviewed, as this coincides with the first five years of the Local Plan (2019-2023). The phasing for these first two years is set out in **Table 1** for each access serving the site during this time.

Table 1 – Indicative build out table

Year End	Number of Residential Units off Each Access								Cumulative Total
	Blackbrook Avenue		Poplars Avenue		Mill Lane		Birch Avenue		
	New	Cum.	New	Cum.	New	Cum.	New	Cum.	
2022	0	0	60	60	60	60	0	0	120
2023	40	40	40	100	40	100	20*	20	260

*in addition to the main site

6. It is proposed that the wording in the proposed submission version Local Plan 2019 associated with the Peel Hall site should be changed, so that by the end of the first five years (2023):
 - i. Up to 40 dwellings can be accessed from Blackbrook Avenue.
 - ii. Up to 100 dwellings and a 100 bedroom care home can be accessed from Poplars Avenue.
 - iii. Up to 100 dwellings can be accessed from Mill Lane.
 - iv. Up to 20 dwellings can be accessed from Birch Avenue.
7. In terms of peak hour traffic flows, this quantum of development would result in the following peak hour flows at each access.

Table 2 – Development traffic flows 2022

Access	Quantum of Development	AM Arrival	AM Departure	PM Arrival	PM Departure
Poplars Avenue (Central)	60 dwellings	14	31	29	18
Mill Lane	60 dwellings	14	31	29	18
Total		28	62	58	36
		90		94	

Table 3 – Development traffic flows 2023

Access	Quantum of Development	AM Arrival	AM Departure	PM Arrival	PM Departure
Poplars Avenue (Central)	100 dwellings	23	52	50	31
	care home	7	7	8	8
Mill Lane	100 dwellings	23	52	50	31
Mill Lane/Blackbrook Avenue	40 dwellings	9	21	5	12
Birch Avenue	20 dwellings	5	11	10	6
Total		67	143	123	88
		210		211	

8. From this it can be seen that the above development flows are of an order of magnitude that is more than capable of being easily assessed within a standard Transport Assessment or Transport Statement with supporting Travel Plan and mitigation measures. It is therefore proposed the Local Plan wording should be modified to allow the above quantum of development at each access to come forward within the first five years provided they are supported by the appropriate assessment studies.
9. The allocation also includes a local centre to serve the local neighbourhood. This will help reduce traffic impact outside the immediate area as existing local residents would visit this facility rather than travel further away as currently occurs. It is therefore also proposed that the Local Plan wording should be modified to allow the local centre to come forward within the first five year period (i.e. in 2023) provided it was supported by the appropriate assessment studies.



**WARRINGTON BOROUGH COUNCIL LOCAL PLAN
PROPOSED SUBMISSION VERSION GREENBELT HOUSING ALLOCATIONS**

Submission by Brooklyn Ltd

Parcel BW8 – Ashtons Farm, Clay Lane, Burtonwood

COMPARATIVE SITE ASSESSMENTS

June 2019

**Landscape
Institute**
Registered practice

17 Chorley Old Road,
Bolton,
Lancashire
BL1 3AD

Tel: 01204 393 006

Fax: 01204 388 792

Email: info@appletons.uk.com

www.appletons.uk.com @Appletons_LArch

Landscape Architecture Ecology Environmental Planning & Assessment Arboriculture

appletons

appletons



17 Chorley Old Road
Bolton
Lancashire
BL1 3AD

Tel: 01204 393006

Email: info@appletons.uk.com

Web: www.appletons.uk.com

Copyright and Non-Disclosure Notice

The contents and layout of this report are subject to copyright owned by Appleton Deeley Limited trading as Appletons save to the extent that copyright has been legally assigned by Appletons to another party or is used by Appletons under license. To the extent that Appletons own the copyright to this report, it may not be used without written agreement from Appletons for any purpose other than that indicated in this report.

The methodology (if any) contained in this report is provided to you in confidence and must not be disclosed or copied to third parties without prior written agreement of Appletons. Disclosure of that information may constitute an actionable breach of confidence or may otherwise prejudice our commercial interests. Any third party who obtains access to this report by any means will, in any event, be subject to third party disclaimer set out below.

Third Party Disclaimer

Any disclosure of this report to a third party is subject to this disclaimer. The report was prepared by Appletons at the instruction of, and for the use by our client on the front of this report. It does not in any way constitute advice to any third party who is liable to access it by any means. Appletons excludes to the fullest extent lawfully permitted all liability whatsoever for any loss or damage howsoever arising from reliance on the contents of this report. Appletons does not however, exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud, or any other matter in relation to which we cannot legally exclude liability.

CONTENTS

- 1.0 INTRODUCTION AND TERMS OF REFERENCE**
- 2.0 PARCEL BW8 LAND AT CLAY LANE, BURTONWOOD**
- 3.0 PARCEL (D) - BURTONWOOD**
- 4.0 PARCEL (E) - CROFT**
- 5.0 PARCEL (F) - CULCHETH**
- 6.0 PARCEL (I) - WINWICK**
- 7.0 COMPARTITIVE ASSESSMENT**
- 8.0 SUMMARY AND CONCLUSION**

APPENDICES

- APPENDIX 1: Original Assessment Report – December 2016**
- APPENDIX 2 Email Correspondence from the Local Planning Authority
June 2019**

1.0 INTRODUCTION AND TERMS OF REFERENCE

1.1 Appletons were first commissioned in November 2016 to review the Green Belt site assessment of Parcel BW8, land at Clay Lane Burtonwood prepared by Arup, consultants for Warrington Borough Council in respect of proposed Green Belt modifications. This was presented to the Council in 2016 and that statement is attached at Appendix A. Since then the Council have published a Proposed Submission Version of the Local Plan. (March 2019).

1.2 The Local Plan submission version identifies a number of housing sites in the form of land to be removed from the Green Belt. Despite the earlier representations made in respect of parcel BW8, that site has not been included as an housing release site. We understand from the Council that the sites categorised as having strong contribution to the Green Belt in the original Green Belt assessment have not been re-assessed or comparatively assessed since that time. In effect, our earlier representations have been ignored. (See the email attached at Appendix 2).

1.3 This further assessment is in the form of an objection to the submission version of the Local Plan on the basis that Parcel BW8 compares very favourably with other identified sites, and should be allocated for housing development.

1.4 As set out in section 8 of this report it is considered that the methodology adopted for assessing the green belt sites originally is flawed and inconsistent.

1.5 The Arup Methodology

The Arup methodology was based on assessing sites against the contribution that they either made or otherwise to the five purposes of Green Belt. These 5 purposes of green belt are set out in paragraph 134 of the NPPF (February 2019). The purposes are set out below

- to check the unrestricted sprawl of large built up areas.

- to prevent neighbouring towns from merging with each other.
- to assist in safeguarding the countryside from encroachment.
- to preserve the setting and special character of historic towns
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

1.6 Each site was assessed under its contribution to each purpose and then an overall assessment was made in respect of its overall contribution to the aims of the Green Belt. The weight given to such contribution was ranked as follows:

- No contribution.
- Weak contribution.
- Moderate contribution.
- Strong contribution.

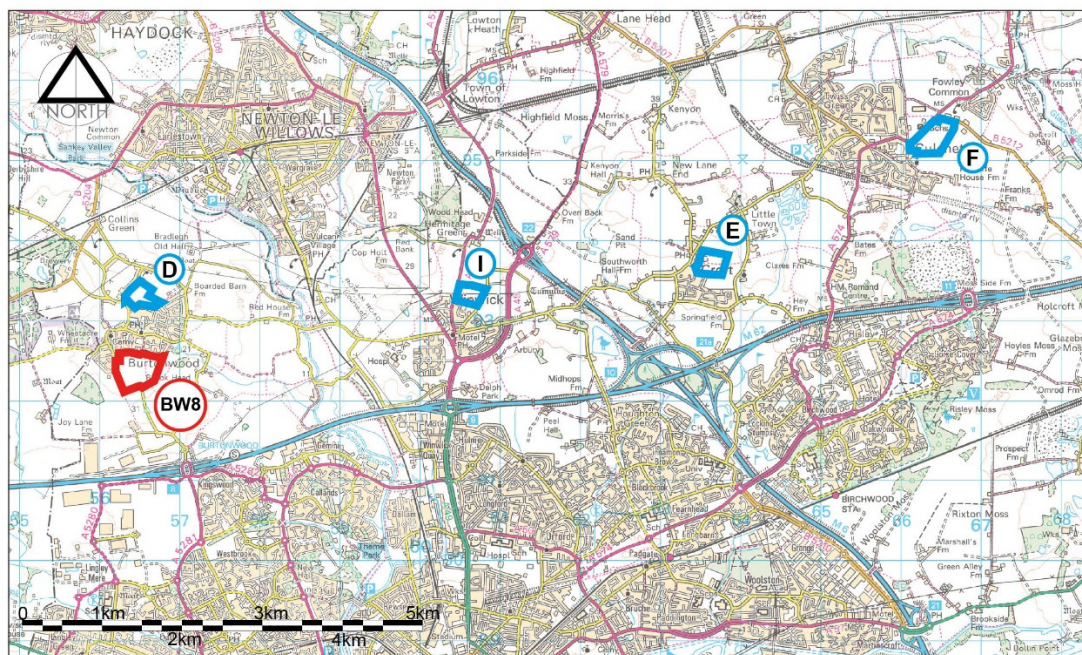
1.7 Factors such as the value of the site in facilitating the recreational use of the countryside were also considered.

1.8 In order to enable a comparison exercise of the sites in the Submission Plan we have assessed four of the sites proposed for allocation which are all located in the villages to the north of the M62 Motorway with a similar relationship to the Warrington urban conurbation. We have used the same assessment approach as Arup. A brief description and an aerial photograph showing the character of each site and its surroundings is set out in the following sections of this report, together with a more detailed assessment of Parcel BW8.







1.9 The sites are, as identified on Figure 6 of the Local Plan:

- (d) Burtonwood.
- (e) Croft.
- (f) Culcheth.
- (i) Winwick.

The location of the sites are shown on **Figure 1** below:



Key:

	Proposed Site Boundary Parcel BW8		Burtonwood		Culcheth
	Other Proposed Green Belt Release Sites		Croft		Winwick

Maps copyright acknowledgment

This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office, Crown Copyright under O.S. Licence No. 100041038. Persons viewing this map should contact Ordnance Survey copyright for advice where they wish to copy or licence Ordnance Survey this mapping/map data for their own use.

2.0 PARCEL BW8

2.1 The site was referenced as BW8 in the Arup assessment and it is located immediately to the south of the settlement of Burtonwood and a little way north of the M62 motorway. The location of the site is shown within the red line boundary on plan 1 below. In carrying out the review a desk top study of relevant documents was undertaken and a visit made to the site and its surroundings.

Site Location:

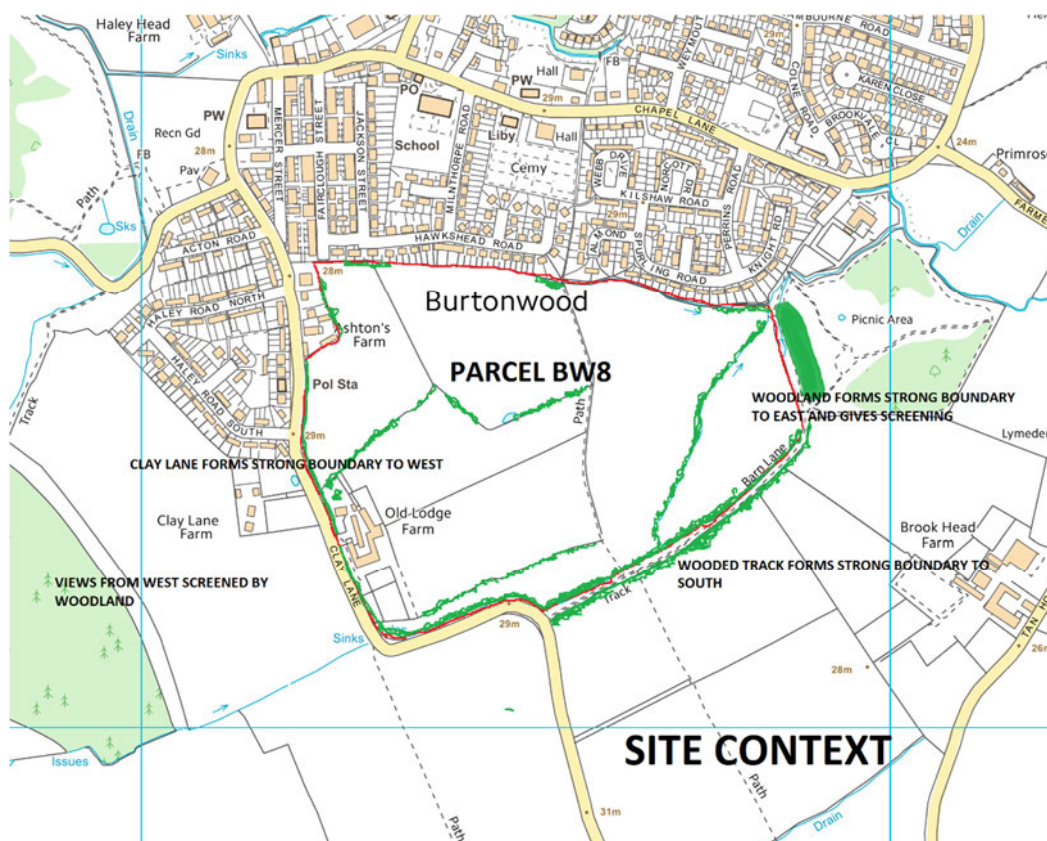


Maps copyright acknowledgment
This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office, Crown Copyright under O.S. Licence No. 100041038. Persons viewing this map should contact Ordnance Survey copyright for advice where they wish to copy or licence Ordnance Survey this mapping/map data for their own use.

2.2 Site description

The site extends in area to approximately 26 hectares. It consists of grazing land in a number of field parcels. Some of these field boundaries are defined by hedgerows. It is generally level with an average contour value of 25 metres A.O.D, though with a fall to the south west. A single public footpath crosses the site from north to south. The northern boundary is formed by the rear gardens of two storey residential properties located on Hawkshead Road and Spurling Road. The eastern boundary is defined by woodland within an area of informal open space. The southern boundary is formed by an unmetalled track known as Barn Lane. The track, which is a public right of way, is contained within two tall and dense hedgerows that contain hedgerow

trees. Due to the presence of strong internal hedgerow boundaries the site lends itself to phased development. The western boundary is formed by Clay Lane. Beyond the northern section of Clay Lane as it abuts the site is an outlier of residential development from Burtonwood. To the west and southern part of Clay Lane as it abuts the site is open countryside with an extensive area of woodland beyond. The context of the site is shown on plan 2 below.



2.3 Arup Assessment Site BW8

The following conclusions were made by Arup in respect of the parcel.

2.3.1 Unrestricted sprawl –

No contribution – not adjacent to the Warrington urban area.

2.3.2 Merging —

Weak contribution.

2.3.3 Encroachment –

Strong contribution – the northern boundary against the rear gardens of the properties to the north was described as ‘non-durable’ in the Arup report, together with the eastern and southern boundaries. The western boundary formed by Clay Lane was, however, considered to be durable. The site was considered to be well connected to the countryside and supports a beneficial use of the Green Belt in providing access via the public footpath that runs through it.

2.3.4 Historic —

No contribution.

2.3.5 Urban regeneration —

Moderate contribution

2.4 Arup Assessment of Overall contribution

The conclusion of the Arup assessment in respect of parcel BW8 was that it made a **strong** contribution to the Green Belt. Using ‘professional judgement’ the authors considered that it ‘supports a strong degree of openness, that the boundaries between the site and the settlement are not durable, and thus it would not prevent encroachment.’

2.5 Site assessment -Appletons

2.5.1 Having visited the site, its surroundings and other potential sites for Green Belt release we undertook our own assessment based on the Arup criteria. Our findings are as follows:

2.5.2 Unrestricted Sprawl

We would concur that the site makes no contribution to preventing the unrestricted sprawl of large built up areas. Burtonwood is not a large built up area, it is a village

within countryside away from the built up area of Warrington. The site therefore makes **no contribution** to unrestricted sprawl.

2.5.3 Merging

We disagree that the site makes even a weak contribution to merging. The southern boundary of the site is located at a distance of over 1 km from the outer edge of Warrington at Callands to the south (with the motorway in between), reducing the existing gap by just 300 metres. It is 2 km from Newton le Willows to the north east and 6 km from the outer edge of Saint Helens to the west. There is no inter-visibility between the site and any of these settlements.

In our opinion there is **no contribution** to merging.

2.5.4 Encroachment

It is almost inevitable that should sites be developed within the Green Belt they will lie adjacent to settlement and thus encroachment must by definition occur. In the case of parcel BW8 however, a non-durable boundary of back gardens will be replaced by a much stronger boundary consisting of Barn Lane with its associated vegetation which gives physical and visual containment to the site. It is inconceivable that this boundary would be breached due to its function as a public right of way and the tree and hedge line, elements of which if necessary, could be the subject of a Tree Preservation Order. The new boundary, if approved would in any event create a strong boundary to the revised area of Green Belt that would endure beyond the Local Plan period. To the west Clay Lane forms a strong physical boundary and the adjacent hedges give good screening. To the east a further hedgerow and an area of woodland physically and visually contain the site. In respect of contributing to the beneficial use of the Green Belt by virtue of the public footpath, the route within BW8 can be retained within an open space corridor.

In our opinion the site makes **no contribution** to encroachment.

2.5.5 Historic

We agree that the site makes **no contribution** to the conservation of the setting and character of historic towns.

2.5.6 Urban regeneration

As with all the possible housing release sites within the Warrington Greenbelt, it is green field. However, we understand that the use of green field sites will be a necessity to meet housing supply needs as only a small percentage of development can be accommodated on brown field/ non-Green Belt sites. The overall requirement is a planning matter and will be dealt with in respect of this parcel by representations made by others. We note that the Arup report suggests that the site would in any event make a moderate contribution to this Green Belt aim. In our opinion, however, given that all the sites proposed are of a similar scale we consider that Parcel WB8 makes a **weak contribution** to urban regeneration.

2.6 Appleton assessment – Overall Contribution

In our opinion, based on the points set out above, we consider that the site makes no contribution to the Green Belt.

3.0 PARCEL (D) -BURTONWOOD



3.1 Site location and description

The site is located to the north of Burtonwood and is currently being used for growing crops. The northern and western boundaries are made up of mature hedgerows and trees with further field parcels beyond. The southern boundary backs onto residential properties of Phipps Lane and Rushton Close. The Eastern boundary is formed by Green Lane with a broken mature hedge acting as the boundary. There are a number of overlooking properties on Green Lane and Rushton Close.

3.2 General Assessment

This area of Burtonwood has a notable rural character with winding country lanes and mature trees and hedgerows. While there are several residential properties adjacent to the southern boundary the north and east boundaries are much more open and therefore offer little in the way of preventing further encroachment into the Greenbelt. This northward growth narrows the Greenbelt between Burtonwood and Newton Le Willows (which comes under St Helens

Council). The land is currently used for crops therefore shows evidence of being of good soil quality and one would assume the land is of value as arable farming land.

Long distance views towards the site will be possible from the east beyond Lumber Lane.

3.3 Contribution

3.3.1 Unrestricted Sprawl

The site clearly forms an extension into the open countryside with weak boundaries and potential for further development in adjacent field parcels.

3.3.2 Merging

There is would be a reduction in the gap between the site and the nearest settlement to the north west.

3.3.3 Encroachment

The site would create infill development between the northern extent of Burtonwood and Green Lane but is very open to countryside located to the north east.

3.3.4 Historic setting

As with all of the sites assessed in this report there would be no contribution to historic setting.

3.3.5 Regeneration

The development of sites within the Green Belt is necessary to meet Warrington's housing land requirements.

3.4 Appleton assessment – overall contribution

We consider that the site makes a **moderate** contribution to the Green Belt..

4.0 PARCEL (E) CROFT



4.1 Site location and description

The site is located to the north of Croft and is currently used as an equestrian centre with practice areas and open grazing. The northern, western and southern boundaries are made up of mature hedgerows and trees with further field parcels beyond. The Eastern boundary is formed by the residential properties of Deacons Close and the rear of Croft Primary School. There are several overlooking properties located on Deacons Close and some views can be gained from Mustard Lane.

4.2 General Assessment

The proposed site has access challenges, as the current access onto the site is via Deacons Close which is a small residential road. Using this road for construction purposes would have a considerable impact on residents living adjacent to it. Due to field parcels being adjacent on three sides, there is little to prevent further sprawl into the countryside. The field parcel to the south would be at particular risk.

4.3 There is currently a busy long-established equestrian centre occupying the site. There would also be an amenity impact on the adjacent Primary School. The size and location of this proposed allocation is questionable. Croft is one of the smaller settlements within the north Warrington borough. This site would represent an increase in the residential footprint of Croft by approximately 20%. Being so flat with defunct hedges, long distance views towards the site will be possible from the east.

4.4 Contribution

4.4.1 Unrestricted Sprawl

The site has weak boundaries against the adjacent open countryside to the north south and east and this would be perceived as unrestricted sprawl.

4.4.2 Merging

There would be a reduction in the separation distance from the settlement to the north west.

4.4.3 Encroachment

The site has a poor relationship to the existing settlement of Croft and development would result in encroachment into open countryside beyond the settlement boundary.

4.4.4 Historic setting

No contribution

4.4.5 Regeneration

The development of sites within the Green Belt is necessary to meet Warrington's housing land requirements.

4.5 Appleton Assessment – overall contribution

In our opinion we consider that the site makes a **strong** contribution to the Green Belt.

5.0 PARCEL (F) CULCHETH



5.1 Site location and description

The site is located north east of Culcheth. The land is currently fallow although recent aerial photos suggest it has been used for crops in the past. The northern boundary is formed by Holcroft Lane with a line of residential properties facing the site. The western and southern boundaries are open with mature trees running along a ditch being the notable features with field parcels beyond the site. There is a short length of hedge to the south west forming the boundary with Shaw Street Recreation ground. The western boundary is formed by the A574 Warrington Road linking north Warrington with the A580 East Lancashire Road. Culcheth Primary and High Schools are located on the other side of the A574. There is a cattery located in the north west corner of the site. There are number of residential properties overlooking the site, located on Holcroft Lane.

5.2 General assessment

The current urban boundary to Culcheth is formed by the Shaw Street Recreation Ground. By allowing the proposed site to be developed, due to the weak boundaries beyond it, there would be pressure to release further development and thus encroachment into the Green Belt. There is little in the way of defensible boundaries to the east with only sporadic mature trees forming the edge of the site. This results in there being open views from the east and potential adverse visual impact from that direction.. Views as far as the foothill of the Pennines can be gained when looking west from the site.

5.3 Contribution

5.3.1 Unrestricted sprawl

This site is very isolated from the settlement and development would represent a major intrusion into the Green belt in terms of unrestricted sprawl.

5.3.2 Merging

There would be some reduction in the extent of the Green Belt between Culcheth and Leigh to the north.

5.3.3 Encroachment

The site is isolated from the existing settlement and would and would result in significant encroachment into the countryside to the east and south east.

5.3.4 Historic setting

No contribution

5.3.5 Regeneration

The development of sites within the Green Belt is necessary to meet Warrington's housing land requirements.

5.4 Appletons assessment – overall contribution

In our opinion the site makes a **strong** contribution to the Green Belt

6.0 PARCEL (I) WINWICK



6.1 Site Location and description

The site is located to the north of Winwick and is currently used for arable cropping. The northern boundary is formed by a small overgrown ditch with fields beyond. The eastern boundary is formed by Waterworks Lane which is a winding country lane with broken hedgerows and mature trees. The southern boundary forms the edge of the Winwick settlement, with a small number of residential properties located on Spires Lane. The remainder of the southern boundary is formed by an underground reservoir and supporting facilities. The western boundary is formed by the A573 Golborne Road which forms a link between Warrington and the A580 East Lancashire Road.

6.2 General assessment

The site has a marked difference in character and a very limited physical relationship to the existing settlement. due to topography and adjacent land uses. It is not an obvious site for new development. While the roads make strong boundaries to the east and west, the northern boundary is open and would be under increased pressure for further extensions into the Green

Belt. The land is currently used for crops and therefore shows evidence of having good soil quality and one would assume the land is of value as arable farming land. The site is lower than the adjacent underground reservoir and waterworks, which poses a question as to whether this constitutes a risk to future development.

6.3 Contribution

6.3.1 Unrestricted sprawl

This site is very isolated from the settlement and development would represent a major intrusion into the Green belt in terms of unrestricted sprawl.

6.3.2 Merging

There would be some reduction in the extent of the Green Belt between Winwick and Newton le Willows to the north.

6.3.3 Encroachment

The site is isolated from the existing settlement and would and would result in significant encroachment into the countryside to the east and south east.

6.3.4 Historic setting

No contribution

6.3.5 Regeneration

The development of sites within the Green Belt is necessary to meet Warrington's housing land requirements.

6.4 Appletons assessment - overall contribution

In our opinion the site makes a **strong** contribution to the Green Belt.

7.0 COMPARITIVE ASSESSMENT

7.1 A comparison between the various assessment sites based on their contribution to Green Belt objectives and using Arup methodology set out in the table below.

	Sprawl	Merging	Encroachment	Historic Setting	Regeneration	Overall
Clay Lane (BW8)	Weak	Weak	None	None	Weak	None
Burtonwood	Strong	Moderate	Moderate	None	Weak	Moderate
Croft	Strong	Weak	Strong	None	Weak	Strong
Culcheth	Strong	Weak	Strong	None	Weak	Strong
Winwick	Strong	Weak	Strong	None	Weak	Strong

8.0 SUMMARY AND CONCLUSIONS

- 8.2 In respect of **Parcel BW8** and applying the Arup criteria in what we consider to be an objective manner it is our opinion that of the five purposes of Green Belt assessed, the site would make **no contribution** to four of them and that in respect of the fifth, there would be only a **weak** contribution. This is contrasted with Arup's assessment of it making a strong contribution.
- 8.3 In comparison with Parcel (d), **Burtonwood** we consider that the site is no better than BW8 and indeed we assessed this as making a **moderate** contribution to Green Belt objectives.....
- 8.4 In comparison with Parcel (e) **Croft** we consider that the site makes a **strong** contribution to Green Belt objectives....
- 8.5 In comparison with Parcel (f) **Culcheth** we consider that this site makes a **strong** contribution to Green Belt objectives.
- 8.6 In comparison with Parcel (i) **Winwick** we consider that this site makes a **strong** contribution to Green Belt Objectives.
- 8.7 We consider therefore that there is an inconsistency in approach that throws doubt on their findings in respect of parcel BW8. Overall, using the Arup methodology the site (on the majority of four 'no's' to one weak) the site would fall into the **no contribution to Green Belt** category.
- 8.8 The Arup report assessed many sites within the Borough using a methodology that was based on compliance with National Green Belt Policy objectives. Having used the same methodology to assess the four other sites as set out above four sites there is a lack of consistency in the selection of the proposed allocations compared with Parcel BW8 which in our opinion would have less of an impact. We have rated all the sites as making a weak contribution to the objective of encouraging urban regeneration since development in the Green Belt is necessary to secure Warrington's housing land requirements.

8.9 Methodology

Having studied the methodology used by Arup in their Green Belt assessment we consider it to be significantly flawed. It uses an arbitrary scoring system based on the number of perceived positive or negative contributions made by each site to Green Belt objectives and then relies heavily on 'professional judgement' to reach a conclusion. No criteria is set out to explain the basis of the various contribution grades, (i.e. 'none' to 'weak' to 'moderate' and 'strong') nor is there an explanation as to how the overall conclusions are arrived at. To score as a 'strong', site in terms of contribution does this require the aggregation of at least two 'strong' elements for example? If there is such a basis for assessment then from our analysis it is not obvious in the selection of the sites for Green Belt release that we have studied. The system is too simplistic to be worthy of weight, and it fails to consider wider potential impacts on the landscape such as prominence, character, nature conservation and soil quality. A wider scoring matrix would have allowed these factors to be taken into account in a possible 'first sieve' to eliminate obvious non contenders prior to a more exhaustive analysis of the remaining sites.

8.10 Moreover it would appear that individual site analysis has not been sufficiently rigorous to give an accurate and objective assessment. As an example, the Arup assessment of the Clay Lane site states that the boundaries between the site and the settlement are not durable, whereas a soft boundary would in fact be changed to a hard one.. As a result, there are significant inconsistencies in scoring from one site to another, and the elimination of any site given a 'Strong' contribution value without any further detailed analysis (as acknowledged in the LPA email attached as **Appendix 2**) is based on premature and inadequately formed judgement..

APPENDIX 1

2016 Report



WARRINGTON BOROUGH COUNCIL LOCAL PLAN GREEN BELT REVIEW

Submission by Brooklyn Holdings Ltd.

Parcel BW8 – Ashtons Farm, Burtonwood

Site appraisal in terms of landscape issues

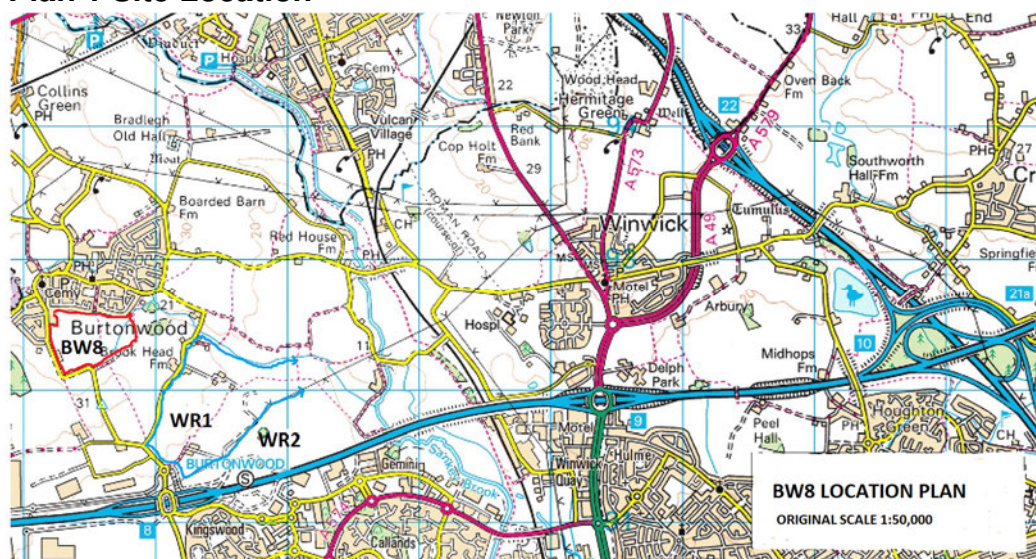
1.0 INTRODUCTION AND TERMS OF REFERENCE

1.1 Appletons were commissioned by Brooklyn Holdings in November 2016 to review a site assessment prepared by Arup, consultants for Warrington Borough Council in respect of proposed Green Belt modifications.

1.2 The Site

The site is referenced BW8 and it is located immediately to the south of the settlement of Burtonwood and north of the M62 motorway. The location of the site is shown within the red line boundary on plan 1 below. In carrying out the review a desk top study of relevant documents was undertaken and a visit made of the site and, for comparison, a number of other potential 'candidate sites' for Green Belt release.

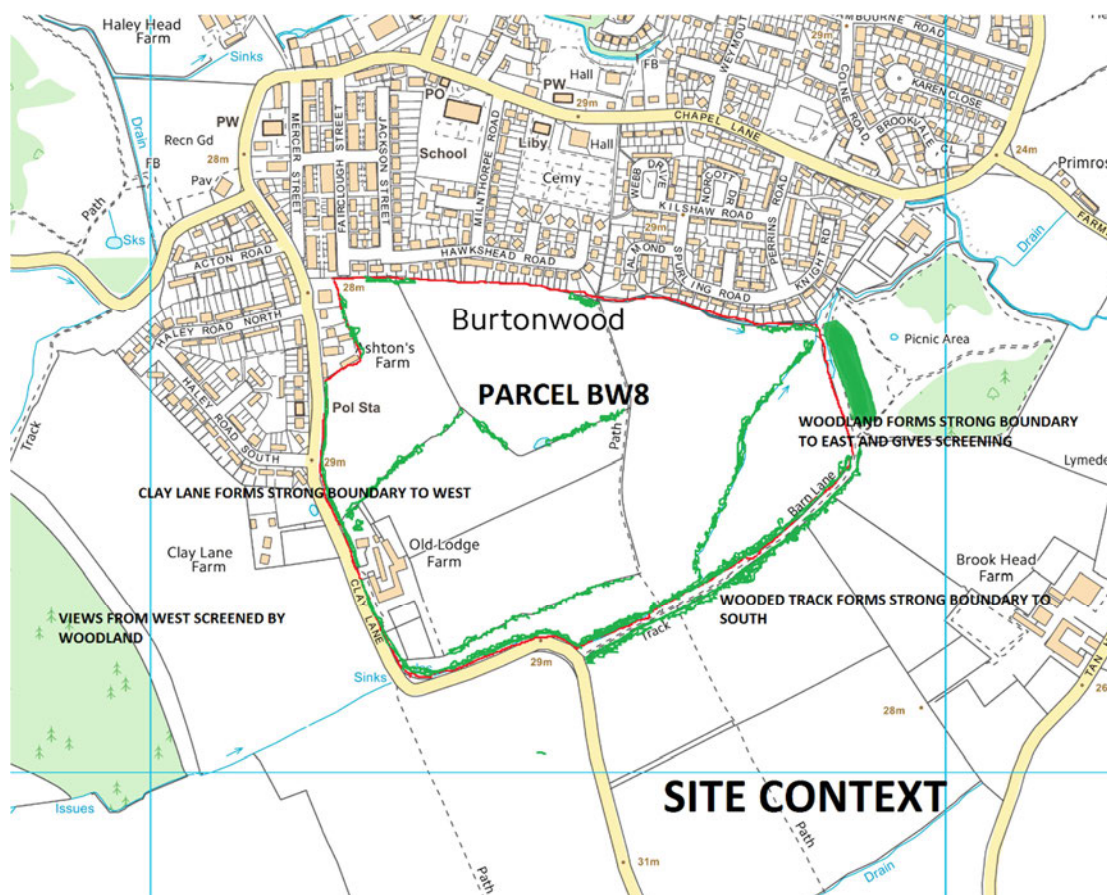
Plan 1 Site Location



2.0 SITE DESCRIPTION

2.1 The site extends in area to approximately 26 hectares. It consists of grazing land in a number of field parcels. Some of these field boundaries are defined by hedgerows. It is generally level with an average contour value of 25 metres A.O.D though with a fall to the south west. A single public footpath crosses the site from north to south. The northern boundary is formed by the rear gardens of two storey residential properties located on Hawkshead Road and Spurling Road. The eastern boundary is defined by woodland within an area of informal open space. The southern boundary is formed by an unmetalled track known as Barn Lane. The track, which is a public right of way, is contained within two tall and dense hedgerows that contain hedgerow trees. The western boundary is formed by Clay Lane. Beyond the northern section of Clay Lane as it abuts the site is an outlier of residential development from Burtonwood. To the west and southern part of Clay Lane as it abuts the site is open countryside with an extensive area of woodland beyond. The context of the site is shown on plan 2 below.

Plan 2 Site context



3.0 SITE ASSESSMENT – ARUP REPORT

3.1 Methodology

The report assessed a large number of sites within the Borough using a standard methodology that was based on compliance with the 5 purposes of green belt as set out in paragraph 80 of the NPPF. The purposes are set out below:

- to check the unrestricted sprawl of large built up areas
- to prevent neighbouring towns from merging with each other
- to assist in safeguarding the countryside from encroachment
- to preserve the setting and special character of historic towns
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.2 Each site was assessed under its contribution to each purpose and then an overall assessment was made in respect of its overall contribution to the aims of the Green Belt.

3.3 Having studied the methodology used by Arup in their Green Belt assessment we consider it to be significantly flawed. It uses an arbitrary scoring system based on the number of perceived positive or negative contributions made by each site to Green Belt objectives and then relies heavily on 'professional judgement' to reach a final conclusion. The system is too simplistic to be worthy of weight, and it fails to take an overview of the role and contribution of a site in wider Green Belt terms. As a result for example there are significant inconsistencies in scoring.

3.4 We note that site BW8 scores unfavourably in the Arup study compared with parcels WR1 and WR2 (identified on map 1 above), both of which are isolated from Warrington to the south by the M 62 motorway, and the development of which would reduce the gap between Warrington and Burtonwood substantially. Development on either of these sites would create an enclave of development in open land unrelated to any other built up feature. Despite that situation these two substantial sites are considered to contribute only a 'moderate' contribution to the Green Belt. It appears that this is predicated only on the fact that there are 'durable' (c/f defensible) boundaries formed by a road to the north and the motorway to the south. In their definition of 'durable' however, the selection of landscape features that in the language of the NPPF are permanent appears to be limited to roads, railway lines and waterways which is selective and not inclusive of permanent landscape or Green Belt edge features.

3.5 Site BW8

The site is referenced as BW8 in the Arup report. and the following conclusions were made:

Unrestricted sprawl – No contribution – not adjacent to the Warrington urban area.

Merging — Weak contribution –

Encroachment – Strong contribution – the northern boundary against the rear gardens of the properties to the north was considered non-durable, together with the eastern and southern boundary. The western boundary formed by Clay Lane was, however, considered to be durable. The site was considered to be well connected to the countryside and supports a beneficial use of the Green Belt in providing access via the public footpath that runs through it.

Historic – No contribution

Urban regeneration – Moderate contribution

3.6 Arup Assessment of Overall contribution

The conclusion of the Arup assessment in respect of parcel BW8 was that it made a **strong** contribution to the Green Belt. Using 'professional judgement' the authors considered that it supports a strong degree of openness, that the boundaries between the site and the settlement are not durable, and thus it would not prevent encroachment.

4.0 SITE ASSESSMENT –APPLETONS

4.1 Having visited the site, its surroundings and other potential sites for Green Belt release we have undertaken our own assessment based on the Arup criteria. Our findings are as follows:

4.2 Unrestricted Sprawl

We would concur that the site makes no contribution to preventing the unrestricted sprawl of large built up areas. Burtonwood is not a large built up area, it is a village within countryside away from the built up area of Warrington. The site therefore makes **no contribution** to unrestricted sprawl.

4.3 Merging

We disagree that the site makes even a weak contribution to merging. The southern boundary of the site is located at a distance of over 1 km from the outer edge of Warrington at Callands to the south, reducing the existing gap by

just 300 metres. It is 2 km from Newton le Willows to the north east and 6 km from the outer edge of Saint Helens to the west. There is no inter-visibility between the site and any of these settlements.

In our opinion there is **no contribution** to merging.

4.4 **Encroachment**

It is almost inevitable that should sites be developed within the Green Belt they will lie adjacent to settlement and thus encroachment must by definition occur. In the case of parcel BW8 however, a non-durable boundary of back gardens will be replaced by a much stronger boundary consisting of Barn Lane with its associated vegetation which gives physical and visual containment to the site. It is inconceivable that this boundary would be breached due to its function as a public right of way and the tree and hedge line, elements of which if necessary could be the subject of a Tree Preservation Order. The new boundary, if approved would in any event create a strong boundary to the revised area of Green Belt .that would endure beyond the Local Plan period. To the west Clay Lane forms a strong physical boundary and the adjacent hedges give good screening. To the east a further hedgerow and an area of woodland physically and visually contain the site. In respect of contributing to the beneficial use of the Green Belt by virtue of the public footpath this can equally apply to all the sites adjacent to Burtonwood and also to sites WR1 and WR2. The footpath route within BW8 can be retained within an open space corridor.

In our opinion the site makes **no contribution** to merging.

4.5 **Historic**

We agree that the site makes **no contribution** to the conservation of the setting and character of historic towns.

4.6 **Urban regeneration**

As with most of the possible housing release sites within the Warrington Greenbelt, it is green field. However we understand that the use of green field sites will be a necessity to meet housing supply needs as only a small percentage of development can be accommodated on brown field/non Green Belt sites. The overall requirement is a planning matter and will be dealt with in respect of this parcel by representations made by others. We note that the Arup report suggests that the site would in any event make only a moderate contribution to this Green Belt aim. In our opinion, however, compared with the WR1 and WR2 sites which are very much larger in scale the site makes only a **weak contribution** to urban regeneration.

5.0 SUMMARY AND CONCLUSIONS

We have set our reservations concerning the methodology used in the Arup study in paragraph 3.1 above. Applying their criteria, however, in what we consider to be an objective manner it is our opinion that of the five purposes of Green Belt assessed, the site would make **no contribution** to four of them and that in respect of the fifth, there would be only a **weak** contribution. We consider therefore that there is an inconsistency in approach that throws doubt on their findings in respect of parcel BW8. Overall, using the Arup methodology the site (on the majority of four 'no's' to one weak) the site would fall into the **no contribution to Green Belt** category.

Footnote

Appletons are a long established firm of landscape architects and environmental consultants based in the North West of England who have extensive knowledge of the Warrington area having been term consultants for the former Warrington Development Corporation. We specialise in undertaking landscape assessments using standard methodology and have appeared as expert witnesses in numerous public inquiries dealing with landscape issues.

APPENDIX 2

Local Authority Correspondence

From: "Usher, Kevin" [REDACTED]
Date: 29 May 2019 at 15:25:06 BST
To: [REDACTED]
Subject: RE: Local Plan SA Report

Hi Colin,

In respect of your email exchanges with my colleague, Michael Bell, regarding your site in Burtonwood. This has two reference numbers (R18/060 and R18/P2/084) that reflect the stages when information was submitted.

The site was assessed after the PDO consultation stage in respect how it performs in Green Belt terms. Hence it is recorded in the [Green Belt Assessment - Additional sites assessments - call for sites/SHLAA \(July 2017\)](#) under the reference: R18/060. This report indicates that the site is the same as Green Belt Parcel BW8. Parcel BW8 was assessed in the [original Green Belt Report](#) as strongly performing when assessed against the five purposes of Green Belt.

In terms of the site assessment methodology for allocating sites in the outlying settlements, which is explained in the [Development Options and Site Assessment Technical Report \(March 2019\)](#) (Pages 13-15), this indicates that an initial sift was undertaken to remove all the sites that are subject to major constraints. At this stage the Council discounted sites making a strong contribution to the Green Belt. This was to ensure that the impact on Warrington's Green Belt was minimised. Consequently, as your site was assessed as strongly performing in terms of its contribution to the Green Belt no detailed site assessment or subsequently SA assessment was undertaken of the site.

I hope this addresses your queries but if you have any further questions please do not hesitate to contact me.

Regards

Kevin Usher
Senior Planning Policy Officer

Planning Policy and Programmes
Growth Directorate
Warrington Borough Council
New Town House
Buttermarket Street
WARRINGTON
WA1 2NH