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Bloor Homes

Appleton Thorn

**Representations to
Local Plan Review**

November 2016

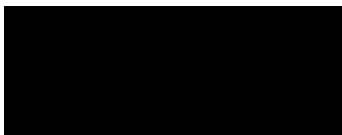
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Signing off Sheet

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Final
Authorised for and on behalf NJL Consulting



Nick Lee
Managing Director

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1.0 Introduction

- 1.1 These representations have been prepared by NJL Consulting on behalf of Bloor Homes in response to the current Regulation 18 Consultation being undertaken by Warrington Borough Council (WBC) on the Local Plan Review.
- 1.2 Our client has an interest in a site located within the village of Appleton Thorn within WBC's authoritative boundary and is making representations in this regard.
- 1.3 Representations have previously been made, on behalf of Bloor Homes, in response to the following consultations:
- SHLAA Call for Sites – September 2013
 - Post Submission Proposed Modifications Consultation – September 2013
 - Additional Consultation on Post-Submission Proposed Modifications to Local Plan – February 2014
 - SHLAA Call for Sites – September 2014
 - SHMA – June 2015
 - SHLAA – August 2015
- 1.4 The representations submitted herein have been structured to reflect the questions identified by WBC. WBC have put forward a number of questions, however, these representations only respond to those considered to be most relevant to our client's interests, as such, the representations respond to the following questions:
- Question 1 - Do you have any comments to make about the Council's evidence base?
 - Question 2 - Do you consider the assessment of Housing Needs to be appropriate?
 - Question 4 - Do you consider the alignment of Housing Needs and Job's Growth to be appropriate?
 - Question 5 - Do you consider the assessment of Land Supply to be appropriate?
 - Question 7 - Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?

- Question 10 - Do you consider the Sustainability Appraisal Scoping Report to be appropriate?
- Question 11 - Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?
- Question 12 - Do you agree with the assessment of Local Plan Policies at Appendix 1?
- Question 13 - Do you consider the proposed 20 year Local Plan period to be appropriate?
- Question 14 - Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?

1.5 Although the decision has been taken at this time not to respond to a number of other questions set out by WBC, NJL, on behalf of Bloor Homes, reserve the right to make representations on other matters in the future, as we deem necessary.

1.6 The next section provides representations in relation to the questions identified above, with a focus on ensuring that the review of the Plan to be undertaken is done so to be sound, justified and supported by evidence.

2.0 Responses to questions

Question 1 - Do you have any comments to make about the Council's evidence base?

- 2.1 The approach taken by WBC to continue developing their evidence base to support the Local Plan and the forthcoming review are supported.
- 2.2 It will be necessary for WBC to ensure that as progress on the Review moves forward the evidence base is continually updated with the latest information available and the Plan is amended accordingly.
- 2.3 With regards to the evidence base used to support the assessment of the housing target for the Borough, the approach taken so far is supported, as WBC have sought to use the most up-to-date study results, in the form of the latest Mid Mersey SHMA (January 2016). It will be imperative for the Council to continue updating their evidence base as further studies are undertaken by the Council themselves, and by other organisations.
- 2.4 The SHMA should be updated regularly, to ensure the most appropriate approach is taken towards the delivery of housing within the Borough and as such, the results of the SHMA should feed into the evidence base for the Plan Review also.

Question 2 - Do you consider the assessment of Housing Needs to be appropriate?

- 2.5 The initial assessment of Housing Need within WBC is supported, as the Council have sought to use the most up-to-date study results, in the form of the latest Mid Mersey SHMA (January 2016).
- 2.6 The SHMA identified an Objectively Assessed Need of 839 new homes per annum, a significant increase on the previous OAN identified within the submission Local Plan. Further to this, GL Hearn published an Addendum for Warrington to the Mid Mersey SHMA, which gave a revised housing need of 984 dwellings per annum.
- 2.7 The Council state that the OAN figure of 839 homes will be used as a starting point for determining the housing requirement for the Borough and that other matters will also be taken into consideration, including land supply position, infrastructure

capacity, environmental constraints, improved affordability and market signals, and economic growth aspirations. This approach is supported, however, it must be the case that the needs of the Borough are met and that the housing requirement within the Plan Review is reflective of the needs of the Borough and addresses the shortfall accumulated to date.

- 2.8 The 2015/16 Annual Monitoring Report states that 595 net new homes were completed within WBC in 2015/16, this is fewer than the net number in 2014/15 which was 687. These figures demonstrate the need for a significant increase in the number of new homes to address effectively the needs of the Borough, as identified within the SHMA.

Question 4 - Do you consider the alignment of Housing Needs and Job's Growth to be appropriate?

- 2.9 To ensure that the jobs growth target for WBC can be effectively met, it is also necessary for the appropriate number of homes to be available within the Borough for the increased workforce.

- 2.10 Paragraph 2.13 of the Regulation 18 Consultation Scope and Contents Documents, states:

'To ensure a balance between homes and jobs it will be necessary to increase the minimum supply of homes to around 1,000 per annum'.

- 2.11 Paragraph 2.14 then confirms that this is the level of housing need the Council intends to take forward through the review of the Local Plan. The acknowledgment by WBC that the former housing requirement was too low is respected and supported. However, it will be important for the Council, as they have alluded to elsewhere within the document, to ensure that the housing requirement figure continues to be supported by the most up to date evidence in terms of jobs growth figures and the issues affecting this growth, and how this translates into housing numbers within the Borough.

Question 5 - Do you consider the assessment of Land Supply to be appropriate?

- 2.12 The consideration of land supply available in the urban area and green field sites outside of the Green Belt is considered an appropriate place for the review of land supply to begin, and this approach is supported by our clients.
- 2.13 However, as with all land supply assessments, there is the possibility that some sites identified within the land supply assessment may not be deliverable, or may not come forward within the anticipated timescales, and as such, more sites should be identified within the land supply for the Plan period where possible.
- 2.14 It is acknowledged that WBC have confirmed an expectation that sufficient land will need to be released from the Green Belt to deliver approximately 5,000 homes and 261 hectares of employment land, this is supported, and demonstrates a commitment by the council to tackling the issue of housing land supply in the Borough effectively to meet housing and employment needs.
- 2.15 The Council are undertaking a further 'call for sites' process to identify any further land within urban areas and greenfield sites outside of the Green Belt not yet included within the land supply assessment, and also to start the process of assessing Green Belt sites suitable for release, this too is supported. The identification of land supply to address requirements of the Local Plan is an iterative process and must respond to changes in land availability and deliverability.
- 2.16 Throughout the Local Plan review process it is recommended that the Council continue to liaise closely with landowners, developers and promoters to fully understand the land supply situation within the Borough and how this is changing, thereby impacting upon the Local Plan throughout its 20 year period.

Question 7 - Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?

- 2.17 The three identified Strategic matters, as set out at paragraph 3.6 of the Scope and Contents Document, are supported and are considered to reflect the matters on which some parts of the Plan were quashed, which resulted in the need for a Review to take place.
- 2.18 The strategic matters identified are interlinked and should be considered in conjunction with each other, and not as separate matter, thereby guaranteeing a

robust review is undertaken and an appropriate outcome for the Local Plan is reduced.

Question 10 - Do you consider the Sustainability Appraisal Scoping Report to be appropriate?

- 2.19 At present, we do not consider it necessary to comment on the SA Scoping Report in detail. We would however, suggest that WBC must ensure throughout the review process that full consideration is given to reasonable alternatives and that a retrospective process is not applied, thereby ensuring the most appropriate outcome for the needs of the Borough.
- 2.20 We may consider it appropriate to make further comments on this Report in due course, and reserve the right to do so as part of future consultations.

Question 11 - Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?

- 2.21 Clearly the Spatial Distribution and Site Assessment Process, set out within a flow-chart at Appendix 2, is still in a very elementary format, given the early stage of the Local Plan review process, and it is therefore hard to, as this stage, comment too much on the assessment process.
- 2.22 However, the initial process set out appears to be appropriate and should allow for the identification of sufficient sites to meet the needs of the Borough. It will be necessary for the process to remain flexible to allow for stages to be repeated should sites fall out of the process or if additional sites are required, as new evidence or information becomes available.
- 2.23 The evidence base identified to support the assessment process is considered to be appropriate and should, if used correctly, result in appropriate sites being identified. Where other evidence becomes available during the process which is relevant to the assessment and identification of sites, this should also be included within the evidence base, ensuring a fully justified and supported review process is undertaken.
- 2.24 Therefore, with the inclusion of some flexibility and the assurance that the evidence base will be utilised to fully inform decisions taken, the assessment process set out at Appendix 2 is supported.

Question 12 - Do you agree with the assessment of Local Plan Policies at Appendix 1?

- 2.25 Having reviewed the assessment of Local Plan policies set out at Appendix 1, the proposition by the Council that all policies will be subject to some degree of alteration (even if just minor) is supported. This demonstrates their commitment to ensuring the entire Plan is responsive to the review being undertaken and ensuring the most up-to-date and appropriate policies are adopted for the Borough,
- 2.26 The assessment has identified a number of policies as requiring major alterations as a result of the review being undertaken. It is considered that those identified reflects the scope of the Local Plan review, and responds effectively to the parts of the Plan which were quashed as a result of the High Court Challenge.
- 2.27 It is, however, recommended that an element of flexibility is applied, and that during the review process if further amends to the Plan are necessary to reflect most recent and up-to-date evidence available, that where appropriate further alterations are made to policies, even where this would result in a major alteration being made to a policy previously identified as requiring a minor alteration.
- 2.28 Therefore, on the whole, the assessment of Local Plan policies at Appendix 1 is supported, subject to an element of flexibility being allowed for.

Question 13 - Do you consider the proposed 20 year Local Plan period to be appropriate?

- 2.29 The Council's decision to set the Local Plan period at 20 years, rather than the lower limit of 15 years as recommended by National Planning Policy, is supported. This will ensure consistency in local planning policy for a longer period, removing uncertainty in plan-making and decision-taking within the Borough.
- 2.30 However, if the Plan period is to be set for the longer period of 20 years it is imperative that the policies are flexible enough to allow for changes in circumstances and for the changing requirements of the Borough.
- 2.31 The Plan needs to ensure that sufficient land is available for release, including that which is currently within the Green Belt to ensure that during the Plan period a shortfall in the availability of sites is not experienced, which adversely impacts upon the requirements and growth needs of the Borough.

Question 14 - Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?

- 2.32 At this stage there are no further matters which we feel should be considered within the 'Preferred Option' consultation draft, however, we look forward to the opportunity to comment further on more detailed policies and the approach to be taken.
- 2.33 As set out above, elsewhere within these representations, we encourage WBC to ensure that the process remains flexible and responds to the changing needs and requirements of the Borough and the availability of data and evidence which will influence the alterations to be made to the Local Plan.