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Warrington Local Plan Examination in Public	
Representor/Number	South Warrington Parish Councils/0450
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Site	Whole Plan

1 Introduction

1.1 Groves Town Planning has been engaged to represent the South Warrington Parish Council's Local Plan Working Group (SWP) since April 2018 at which time the Preferred Development Option of the Council had been published.

1.2 SWP has previously raised concern over the assessment of housing need. The complexity and inexact nature of such assessment is illustrated by the range of figures which have been used by the Council across the period over which the plan has been evolving – ranging from 800 – 1100 dwelling per annum.

2 Key areas of concern

2.1 Assumed levels of household growth are unrealistic and do not represent historic trends or ONS population growth.

2.2 Use of 2014 household growth rates distorts scale of growth since 2014. In the case of Warrington the later 2018 household growth rates are more closely aligned to trends. 2018 figures would provide for a housing 458 dpa across the plan period instead of 816.

2.3 Average completions 2010-2020 500 dpa

2.4 Issues relating to Employment Land

2.5 Demand is based on market desire to locate on strategically well located sites, close to the motorway network on easy to develop sites.

2.6 It is obvious that Warrington and South Warrington attractive on this basis.

2.7 The function of planning process is to manage this demand and direct development away from areas protected from development and towards locations where

wider public development, where NPPF requirements of sustainability can be achieved.

3 Commentary

3.1 The PSV relies on a Housing Needs Assessment date August 2021.

3.2 The essential calculation of need is addressed in a context of the expectations of the NPPF and PPG producing the annual housing need figure of 816.

3.3 As with the previous 2019 PSV it is contended that the use of 2014 based household projections is flawed and fails to represent true levels of need as a consequence of change in circumstances since those projections were considered.

3.4 The requirement for 816 dpa is based on an assumed growth of households of 7145 households, an increase of 7.6% over the period 2021-2031.

3.5 Using ONS projections for the same period but based on the 2018 projection suggests a predicted growth in households of 4014, an increase of 4.37%. Using the standard methodology to include the affordability ratio produces a figure of 458 dpa.

3.6 The significant contrast between the figures requires careful consideration before committing to a pathway which would require the release of such large areas of Green Belt.

3.7 Appendix 6 of the Council's 2020 Strategic Housing Land Availability Assessment (SHLAA) provides details of house completions across the period 2003/04 to 2019/20. These figures reveal that across a 17 year period completions per annum has only exceeded the 816dpa on four occasions – all between 2004 and 2008. This was at a time when a small number of sites, producing high density

development came on stream. This reflected the Town & Country Planning (Residential Development on Greenfield Directive 2000 and requirements for higher density development – sites such as Chapelford and the redevelopment of the former Carrington Wire Works. Over the 17 year period the average completions per annum equates to 648 dwellings per annum. For the ten years to 2020 this figure drops to 500 dwellings completed per annum.

3.8 The same appendix provides a figure for annual build rates across the small, medium and large sites included in the analysis. This suggests that on larger sites – more than 150 dwellings an average build rate per annum of 56 dwellings is achieved. Whilst treated with caution this data published by the Council appears to contradict claims that development on individual sites, including those with the

SEWUE will exceed 160dpa. This being considered a build out rate necessary to secure required levels of delivery.

3.9 Paragraph 61 of the NPPF clearly requires the use of the standard method contained within national guidance to produce a local housing need assessment. The NPPF does however also note scope for alternative approaches which reflect current and future demographic trends and market signals. There is no evidence that consideration has been given to this provision. There are a number of exceptional circumstances at play here which would justify the use of an alternative approach – including the unprecedented impact of Covid. The world has changed drastically since 2014.

3.10 ONS population forecasts predict an increase in the population of Warrington of 6722 between 2018 and 2038. An increase of 3.2%. The demand for household growth

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anticipated in the PSV can be seen to be driven by speculation of additional increases in population arising almost entirely by take up new employment opportunities in the logistics sector as land is released for such development.

3.11 In order for the PSV to the secure delivery of development which is sustainable – economically, socially and environmentally, it would be necessary, to totally remodel the pattern and form of the housing market across the whole of Warrington. The majority of new housing in South Warrington would have to be at a level of affordability commensurate with types of employment opportunity created by the release of Green Belt land for logistics based development

3.12 No recognition is given to this pattern of housing development across south Warrington. Housing in South

Warrington supplies a different market to that provided by the urban core, newer development in North West Warrington and the northern villages. The housing needs for the borough are different across the area. They reflect proximity to sources of employment, travel to work modes, mobility of potential occupiers and a range of socio-economic factors. Housing need for greater Warrington cannot be arithmetically assessed in a vacuum divorced from economic and demographic issues. The 'one size fits all' approach is not suitable given the history and demography of South Warrington as set out in Chapter 5.

3.13 There is risk that large scale addition of affordable housing in South Warrington, will make inequality worse rather than better across Warrington. Focus on regeneration would be lost and the improvement to infrastructure and service provision to less privileged parts

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of the Borough would be diminished rather than enhanced. Groves Town Planning Ltd

3.14 The housing market in Warrington and the region in which the town is located is complex. It is driven as much by supply as need, with take up arising from market values as much as growth in narrowly defined areas.

3.15 The release of land in Cheshire East and Cheshire West and Chester as development plans have been adopted changes the housing market, as does development in the west of Trafford and Salford. At a more local level development at Sandymoor and Daresbury in Halton impacts the housing market of south Warrington

3.16 It is clear from travel to work patterns that Warrington is a source of employment for large numbers living outside the Borough. Often this employment is

based on lower paid areas of employment outside the high earning professional and managerial sector. Information produced by those presenting development proposals within the logistics sector suggests that up to 60% of their workforce lives outside Warrington. Logic would suggest that predicted population growth is not necessarily aligned with sources of predicted employment growth. Building of new housing in South Warrington will not be able to guarantee the delivery of the scale or affordability of housing which would change this unsustainable pattern of development. Increased growth in neighbouring boroughs would be of greater benefit in terms of regeneration, economic development and sustainable transport patterns, than an approach which takes an ill-considered option, responding only to the expectations of landowner and developers. The approach adopted by Warrington is

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inwardly focused and does not take account of the sub regional and regional position. Groves Town Planning Ltd

3.17 Possibly the only positive from the previously proposed Garden Suburb proposal was the application of Garden City principles where the concept of closely connected places for living, working and leisure are followed.

3.18 In reality this concept of a connected, holistically planned settlement was impossible to deliver and was not reflected in the previous PSV.

3.19 The Local Housing Needs Assessment (LHNA) acknowledges the complexity of marrying economic growth with population growth. Whilst utilising a range of sophisticated assessment tools, the LHNA demonstrates an absence of key drivers affecting economic growth and population growth in Warrington and the surrounding

region. It ignores interaction with neighbouring authorities and proposals within their development plans – contrary to the need for plans (and the evidence underlying them) to be effective by cross working on strategic issues such as housing. It ignores historic levels of housing development and ignores decreasing predicted levels of population.

3.20 The level of economic growth is not based on tangible evidence based on the impact of new large scale development, new infrastructure or specific activity which is of sufficient scale to generate increased activity supporting inward migration and growth generation.

3.21 The driver for growth and therefore for housing is almost wholly based on employment opportunity arising from new development based around logistics. Such development is highly dependent on locations in key positions to the strategic motorway and highway network.

Given Warrington's location on the M6, M62 and M56, it is naturally attractive to such uses, but in an increasingly competitive market, neighbouring authorities are also presenting the scope to accommodate logistics based development. It would almost certainly be possible to secure development alongside much of the motorway network across Warrington, particularly at any of the seven motorway junctions, but that is only justified on the basis of a Warrington's corporate agenda driven by growth at the cost of all other considerations.

3.22 The Council has a vested interest in securing such growth as result of investment in the acquisition of sites including logistics based development

3.23 The Council's 2020 Strategic Housing Land Availability Assessment includes at appendix 6, figures for the total number of gross completions from 2003/4 to

2019/20. Over that 17 year period a total of 7006 homes were completed, an average of 412 dwellings per annum. This represents a historic level of delivery which is only 51% of the average delivery anticipated by the Submission Draft.

3.24 Growth appears entirely dependent on the economic impact and job creation of 4 million sq ft plus of modern logistics warehousing.

3.25 The HCA Employment Development Guide 2015 suggests that there is a downward pressure on employment density in buildings serving the distribution sector, although it is acknowledged that some additional highly skilled roles will emerge with specialist maintenance and programming of automated equipment. Development for such uses will generate half the employment density produced by B1 or B2 uses.

3.26 The seasonal nature of retail related distribution necessitates short- term and zero hours contracts.

3.27 The LHNA dismisses alternative growth forecasts previously predicted by Oxford Economics and Cambridge Economics, preferring an appraisal which more closely reflects historic growth patterns without any clear justification, and without consideration of the volatility and unpredictable nature of market conditions.

3.28 Given low levels of unemployment in Warrington, that growth will drive population growth and inward migration with consequent stimulation of the local economy. The plan presumes that new infrastructure can be delivered within the Plan period so as to viably connect areas of higher unemployment with areas allocated for new commercial development.

3.29 The form and scale of growth anticipated appears to disregard historic relationships with neighbouring areas and travel to work patterns. South Warrington has become attractive as a place to live as an alternative to more expensive suburbs of South Manchester. More rural surroundings but with ease of access to the motorway network, as well as cost, has influenced this pattern. Unless congestion reduces on the motorway network or public transport connections dramatically improve, the basis for high levels of demand for housing in South Warrington will diminish. 8.30 Understanding of the patterns of demand and supply of housing across Warrington is critical to provide context to the application of household growth and population forecasts to assess trajectories for future development.

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3.30 New Town Designation has been a major influence creating a supply of housing land beyond a scale which would be otherwise developed. The availability and advent of the Chapelford development on the former RAF Burtonwood base created supply which exceeded demand and resulted in development extending beyond the expected period for completion.

3.31 The decision to release land on the previous employment allocation of the Omega development has influenced the ability to deliver high levels of supply.

3.32 During the 1990's the Council was unable to demonstrate adequate levels of supply against requirements which were then applicable, resulting in development on Green Belt and Open Countryside which had previously been resisted. It is evident that developers were attracted to high value development of green field

sites in areas such as Lymm. Notwithstanding provision for affordable housing, these developments provide ample demonstration of how such development has not made any realistic contribution to the availability of truly affordable accommodation in appropriate locations and critically, this has demonstrated the adverse impact on regeneration at the heart of the urban area. It was only with Government Directives in the 1990s and 2000's prompted that developers started to reassess their approach to development at the heart of the settlement. The demise of traditional industry in Warrington created the opportunity to reassess the viability of former tannery, wire works and similar sites within central Warrington. This resulted in a peak of development in the mid 2000's with higher density development including apartments distorting the supply position across this period to a point

that the Council introduced a moratorium on new housing developments.

3.33 The evidence base to the PSV21 does not include any clear assessment of current levels of urban capacity. Submissions reference expectation of the scale of development possible within the existing settlement but there appears to be no specific update to the evidence base used for the 2017 PDO. The Plan in this sense is backward looking rather than forward looking.

3.34 The release of significant areas of undeveloped land in the Green Belt threatens the Council's objectives to secure regeneration and to address current inequalities between the villages and suburbs on the edge of the town, and inner parts of the town.

4 Conclusion

4.1 It is contended that the evidence base used to establish the baseline expectations for growth are overly ambitious. As a consequence housing need assessment is exaggerated and produces figures which over state levels of need.

4.2 The south of Warrington in common with other parts of north Cheshire is an attractive location for high value housing development. During periods of low interest rates, growth in adjoining conurbations and the availability of easy to develop green field sites it is easy to demonstrate local demand. The issue to consider here is how best to manage that demand. The approach taken by the Council to accommodate as much growth as possible is wrong and cannot be used as justification to release large areas of Green Belt.