

**Hearing Position Statement by**  
**Tetra Tech Planning**  
**on Behalf of Ashall Property Ltd**

**MATTER 12: WARRINGTON'S**  
**HISTORIC, CULTURAL, AND BUILT AND**  
**NATURAL ASSETS**

Prepared by Tetra Tech Environment Planning Transport Limited.

Registered in England number: 03050297

Our Reference: B040704/12

## Summary of matters addressed in this Statement:

We will provide a summary of our Client's position on the Issues and Questions raised by the Inspectors on Matter 12 and will set out what actions are required, in our opinion, to make the draft Local Plan sound.

Matter 12 Inspectors' Questions being addressed: Questions 3 and 4.

### 1. Introduction

- 1.1 Tetra Tech Planning is representing Ashall Property Limited (our 'Client') in support of their proposed site on Land South of the A56 Chester Road (site reference R18/P2/041 – SHLAA reference 2671). Ashall Properties Limited own the Freehold interest of this 8.18 hectares (20.21 acres) site in Walton.
- 1.2 This Statement supplements the submissions previously made by Ashall Property Limited on the consultations prior to the UPSVLP, the UPSVLP itself (Respondent Reference UPSVLP 0417), and Hearing Position Statements on Matters 3 and 6c, 8, and 12. This statement should therefore be read in conjunction with our Client's other representations.

### 2. Response to Inspectors' questions

**Q3: Will the Town Centre housing density requirements, as set out at Policy DEV1 point 5a and b, impact on the ability to achieve the Policy DC1 point 2e. relating to improving the Inner Warrington housing offer to provide a range of tenures and types of dwellings?**

#### 2.1 Yes

- 2.2 The Council is seeking to justify the 130dph minimum density based on a list of consented schemes (some of which have been implemented) as evidenced in Appendix 4 [pages 153-154, H4a] of the 2021 SHLAA. Not one single family dwelling was delivered across the 10 Town Centre schemes (2769 dwellings) listed in Appendix 4.
- 2.3 The 130dph minimum density requirement will massively impact on the ability to improve the Inner Warrington range of housing. By the looks of it the accommodation is becoming more and more one dimensional which will undermine a healthy demographic mix in the Town Centre.
- 2.4 There is also very little correlation between points 5a of Policy DEV1 and the Council's own housing need evidence base. The Local Housing Needs Assessment [H2] as updated in 2021, indicate two-thirds of the demand for new market housing in Warrington is for larger properties (3-bedrooms+). The very high prescribed densities

for the Town Centre will undermine the ability for schemes to come forward in the Town Centre that could meet this significant need for larger properties.

2.5 Most of these schemes contained no private amenity space, which one would expect for most dwellings, but in particular for family homes. That, together with the need for car parking will make it even harder to provide family homes at the prescribed 130dph density.

Q4: Will viability issues in Inner Warrington impact on the ability to achieve the requirement at Policy DC1 point 2f. to provide sufficient amounts and types of affordable housing in accordance with Policy DEV2 to meet specific local needs?

2.6 **Yes, very much so.**

2.7 Proposed Policy DEV2 sets a requirement of 20% affordable housing for Inner Warrington, including the Town Centre. We can understand why the Council would want to set the affordable housing threshold at this level for Inner Warrington. The Council has a significant affordable housing need of 423 dwellings per year and it is proposing to focus much of its housing delivery in Inner Warrington through very high minimum density thresholds.

2.8 Therefore, to make any meaningful progress on delivering the required need they have no choice but to apply a policy well above the minimum 10% affordable housing threshold in the Local Plan.

2.9 The simple fact is that this approach is just not viable and it is one of the main reasons why the UPSVLP is not sound in its current format. This is evident in all aspects of the Council's own evidence base.

2.10 The Council's Local Plan Economic Viability Assessment (EVA) demonstrates most residential developments within the town centre are unviable. Our client has already commented in detail on the Council EVA in previous responses and our Matter 3 Hearing Position Statement.

2.11 A review of the 10 Town Centre sites listed in Appendix 4 [H4a] of the 2021 SHLAA provides further evidence that delivering any meaningful level of affordable housing in the Town Centre is not viable. Out of the 2769 dwellings in that list there was a total of 18 affordable housing apartments. That is a disconcerting 0,65% affordable housing across those 10 sites.

2.12 The Council's evidence also aligns with our client's own very recent experience in the Town Centre where he considered a residential development opportunity with the

Council's development arm, Warrington and Co. This confirmed that the project will not be deliverable without multi million-pound cross subsidy.

- 2.13 Setting a 20% threshold for affordable housing for the Town Centre will have a reverse effect to the regeneration of the Town Centre as it will frustrate and elongate the Development Management process by requiring individual viability assessments to be undertaken, and negotiated, for every major residential application in the Town Centre. This will only discourage developers to develop in the Town Centre.
- 2.14 A more appropriate approach would have been the approach taken by neighbouring St Helens Council in their Local Plan that was adopted as recently as July 2022. St Helens Council has adopted a requirement for brownfield sites in the Town Centre (Affordable Housing Zone 3) to deliver just 10% affordable housing. This ensures their Local Plan still complies with the NPPF but gives developers the best possible chance of making development in these areas viable.

### 3. Actions required to make the UPSVLP sound

- 3.1 The minimum density threshold for the Town Centre as set out in DEV1 should be reduced. A figure of 70dph would still achieve significantly higher densities than what is prescribed for the rest of the Borough but it will provide flexibility for larger dwellings to be delivered as well.
- 3.2 The affordable housing requirement in the Town Centre should be reduced to the minimum 10% to still comply with the NPPF.
- 3.3 The Council should allocate further deliverable greenfield sites for housing to make up the resultant deficit in housing supply and to deliver more affordable homes. The selection criteria should be consistent and follow the Council's preferred approach of allocating sites adjacent to the Main Urban Area.
- 3.4 Our Client's site (Land South of Chester Road – SHLAA reference 2671) borders the Main Urban Area of Warrington, is less than 250 metres from Inner Warrington and less than a kilometre from Stockton Health local centre. It is in single ownership with good road access and is therefore deliverable within years 1-5 of the Plan Period. It has a site capacity to provide a care home with (80 to 110) beds, 70 extra care or retirement apartments and 137 dwellings (of which 50% will be affordable housing).