



Warrington Local Plan 2021-2038 Examination

Hearing Statement on behalf of Redrow Homes Ltd

Matter 8 – Housing Land Supply

Relevant Sites:

Land West of Culcheth (Call for Sites ref R18/P2/020; Land at Kirknall Farm)

Land at Glazebrook (Call for Sites ref R18/P2/021; Land west of Glazebrook Lane & Bank Street)

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Respondent Ref Number: 2326

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1 Introduction

- 1.1 This Statement has been prepared by Hive Land & Planning on behalf of Redrow Homes Ltd ('Redrow') and responds to the Matters, Issues and Questions released by the Inspectors on 23rd June 2022. In this submission Redrow are responding to **Matter 8**.
- 1.2 The involvement of Redrow in the Warrington Local Plan Examination relates to the continued promotion of three sites for residential development, namely:
- Land West of Culcheth (Call for Sites ref R18/P2/020; Land at Kirknall Farm) – capable of delivering 350 to 450 new homes
 - Land at Glazebrook (Call for Sites ref R18/P2/021; Land west of Glazebrook Lane & Bank Street) – capable of delivering 600 to 700 new homes
- 1.3 Neither of the sites are currently identified as Housing Allocations in the Warrington Updated Proposed Submission Version Local Plan (WLP), but Redrow have promoted their inclusion within the WLP as Housing Allocations at each Local Plan consultation stage and maintain that these are sustainable and appropriate sites to release from the Green Belt and deliver new homes.
- 1.4 This Hearing Statement should be read in conjunction with the other statement being submitted by Redrow in response to **Matter 7b**, which relates to Culcheth.
- 1.5 We trust that this Statement assists the Inspectors in respect of the Examination.

2 Matter 8 – Housing Land Supply

Question 1. What is the up to date situation regarding actual housing completions so far in the plan period i.e. 2021/22?

2.1 Redrow has no specific comments to make in response to this question.

Question 2. For each of the following sources of housing land supply for the whole plan period in turn, what are the assumptions about the overall scale, lead in times, timing and annual rates of delivery? What is the basis for these assumptions and are they realistic and justified?

a) SHLAA sites under construction

2.2 Redrow has no specific comments to make in response to this question.

b) SHLAA sites with planning permission but not started (split by outline and full)

2.3 Redrow has no specific comments to make in response to this question. .

c) SHLAA sites without planning permission

2.4 A significant area of concern for Redrow is whether realistic assumptions have been made in respect of the anticipated number of dwellings to be delivered on SHLAA sites within the existing urban area and whether they are founded upon credible evidence.

2.5 The NPPF (2021) confirms the definition of what constitutes a deliverable and developable site at Annex 2, which we do not repeat here. Paragraph 71 of the NPPF then states that:

“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”

2.6 Redrow’s Regulation 19 response carried out a detailed analysis of this source of housing land supply within the Warrington urban area in the context of these key policy considerations, which we now summarise.

Assessment of claimed supply from the Wider Urban Area

2.7 The SHLAA Sites in the existing urban area (outside of the Town Centre and Waterfront masterplan areas) are anticipated to deliver 6,307 dwellings during the plan period, which equates to 315 dwellings per annum. The Housing Trajectory set out at Appendix 1 of the WLP is based upon those SHLAA sites that the Council consider to be developable in accordance with Annex 2 of the NPPF and also includes sites located within the Town Centre.

2.8 Redrow have concerns with the validity of the Council's claim that all of the SHLAA sites that have been identified are developable. Of concern is the following extract from the updated 2021 SHLAA:

'3.19 This site sifting exercise and re-assessment of stalled sites means that the large sites with planning permission that are included in the short to mid-term (0-5 years and 6- 10 years) outstanding capacity have a high degree of certainty of coming forward. As has the Small Sites Allowance, which is based on historic completions data. This sifting and re-assessment exercise provides confidence in the data used for the supply position and as a result there is no need to include an additional 'lapse' or non-delivery rate.'

2.9 This suggests that SHLAA sites that have been the subject of a now expired planning permission could still remain within the 'developable' housing land supply, but have simply been pushed further back into the plan period. Planning Practice Guidance¹ requires a reasonable estimate of build out rates to be provided and for the evidence base to set out exactly how any barriers to delivery could be overcome in respect of specific sites.

2.10 It is therefore incumbent upon the Council, to adequately test the reasons as to why individual sites may not have come forward. For example, in respect of a site's availability this could mean establishing whether there are any unresolved multiple ownerships that may have resulted in the site not coming forward for development. This would normally be through a review of the Call for Sites responses (or lack thereof). PPG states that in such circumstances:

¹ Paragraph: 026 Reference ID: 3-026-20190722

'When assessing sites against the adopted development plan, plan-makers will need to take account of how up to date the plan policies are and consider the relevance of identified constraints on sites / broad locations and whether such constraints may be overcome.' (Paragraph: 018 Reference ID: 3-018-20190722).

- 2.11 A robust and necessary exercise such as this does not appear to have been undertaken in respect of the SHLAA sites in the urban area that might historically have been stalled.
- 2.12 This is particularly important in Warrington, because it has been acknowledged that there is insufficient capacity within the existing urban areas to accommodate housing needs for the plan period, which has triggered the exceptional circumstances necessary to undertake a review of the Green Belt and allocate sites accordingly. The baseline supply position is therefore particularly critical in Warrington as a result.
- 2.13 On this basis, Redrow consider that a non-delivery rate of 10% from this source of housing land supply is entirely justified and additional Green Belt sites should be identified as new Housing Allocations to make up the likely shortfall in the baseline supply position. The 10% flexibility factor that has been applied to the housing requirement under Policy DEV1 is not considered to be a sufficient enough measure to address this significant concern.
- 2.14 To not allow for a sufficient enough lapse rate is inconsistent with the approach that has been taken in neighbouring St Helens, where a 15% discount has been applied to years 6-16 of the SHLAA Supply and non-Green Belt allocations to allow for the non-delivery of sites. The St Helens Local Plan was subject to Examination in 2021 and this approach was endorsed by the Inspectors, and the Plan has recently been adopted on this basis (12th July 2022). Given that Warrington and St Helens lie within the same Mid Mersey Housing Market Area it seems highly irregular that Warrington would not adopt the same, or a similar, stance.
- 2.15 In order to account for the potential (and as the evidence suggests, likely) non-delivery of some SHLAA sites within the 'Wider Urban Area' Redrow are of the view that a non-delivery rate of 10% should apply. The quantum of housing from this source of housing land supply should therefore be **reduced by 699 units**.

SHLAA Sites within Town Centre

2.16 Redrow has undertaken an analysis of the claimed supply from SHLAA Sites within the Town Centre and consider that an over-optimistic yield has been allowed for within the claimed housing land supply. A summary of our analysis is now provided.

Flood risk concerns

2.17 Two sites have specific flood risk issues:

- Wharf Industrial Estate (SHLAA ref 2482, 128 units). The land falls entirely within Flood Zones 2 and 3. Also, the 31 industrial units are largely occupied, with any vacant units advertised To Let and so appear to be in viable economic use. **A reduction of 128 dwellings should therefore apply.**
- Southern Gateway (SHLAA Refs 3568, 1753, 1752, 2676a and 2676c, 351 units) - lie entirely within Flood Zone 2 and should be removed from the developable supply on the basis that sequentially, other more suitable sites are available in Flood Zone 1). **A reduction of 351 dwellings should therefore apply.**

Non-delivery rates

2.18 The Warrington Town Centre Masterplan claims that 8,000 units will be completed in the Town Centre, which equates to 421 dwellings per annum. Given that average annual completions in Warrington as a whole have averaged 567 per annum over the last 10 years it is unrealistic to suggest that 421 will be delivered per annum throughout the entirety of the plan period in the town centre alone.

2.19 Taking a generous approach and being mindful of the significant viability concerns and infrastructure funding deficit that exists, Town Centre sites should equate to no more than 25% of the yield from the 'Wider Urban Area' (6,992) as set out at Appendix 1 of the WLP. This equates to a yield of 1,748 from this source and represents **a reduction of 646 dwellings.**

2.20 In total, we consider that a **total reduction of 1,125 dwellings should apply to SHLAA sites within the Town Centre.**

Recommended Changes

2.21 Taking the reductions described above in respect of SHLAA Sites within the Wider Urban Area and Town Centre into account, Redrow consider that the yield from this source of housing land supply should be reduced by the following:

- Wider Urban Area SHLAA sites (outside of Town Centre) – Reduce by 699 units
- Town Centre SHLAA sites (Town Centre) – Reduce by 1,125 units
- **Total reduction from the SHLAA Sites without planning permission – 1,824 units**

d) Small site allowance (windfalls)

2.22 Redrow has no specific comments in response to this question.

e) Each of the Main Development Area involving housing

2.23 Redrow has specific concerns in respect of the claimed yield from some of the Main Development Areas, with reference to the Housing Trajectory at Appendix 1 of the WLP.

Waterfront

Description	
Total dwellings 2021-2038	1,070
Flood Risk Parcels K5 and K7 are partially within Flood Zones 2 and 3a and so a reduction of the site's total capacity of 1,070 dwellings (25% suggested based upon the area of land affected by flood risk) should be applied, which equates to a reduction of 268 dwellings.	-268
A significant lead-in time (10 years) applied to the Housing Trajectory for the Waterfront Area to allow for the delivery of the Western Link Road. Adjusting the trajectory so that realistic first completions now begin at 2030/31 (as per the	-290

analysis undertaken in Redrow’s Regulation 19 consultation response) would see this source of housing land supply reduce by 595 dwellings.	
Total shortfall in supply from the Waterfront Main Development Area	-512

South East Warrington Urban Extension

2.24 Redrow do not object to the principle of including the South West Warrington Urban Extension (SEWUE) Garden Suburb as a Main Development Area within the WLP, but it is necessary to test whether the site is capable of delivering the level of housing set out within the Housing Trajectory provided at Appendix 1 of the WLP. Specifically, the following factors need to be considered:

- Is the lead-in time and delivery rate appropriate when considered against industry research and past trends in Warrington?
- The need to adjust lead-in times and delivery rates to account for the delivery of ‘major’ infrastructure items.

2.25 These areas of concern are now considered in more detail, with appropriate evidence provided where relevant. First however we provide the context of the baseline position as set out in the WLP to assist with our analysis.

Baseline Position

2.26 The Housing Trajectory confirms that the SEWUE is anticipated to deliver 2,430 dwellings during the plan period on the Green Belt land and 772 on the Homes England consented SHLAA sites. Average maximum completions of 180 per annum are anticipated to be achieved on the Green Belt land following the completion of the existing consented sites in 2027/28.

2.27 This represents 20% of the overall housing requirement of 16,157 established under Policy DEV1, and so it is essential that the assumptions being used to underpin this rate of housing delivery are robust and realistic.

2.28 The 'South East Warrington Urban Extension – A Deliverable Proposition' prepared by Homes England and Miller Homes in August 2021 forms part of the WLP evidence base and so underpins the proposed housing trajectory. An Indicative masterplan is provided, which sees the residential element delivered along with Local Centres, Education, Healthcare and Community uses and extensive green infrastructure.

Lead-in time and delivery rates

2.29 The housing trajectory separates out the 'SHLAA Sites (HE consented)' as this is land that is not within the Green Belt and benefits from planning permission, equating to a total of 772 units to be delivered between 2021/22 and 2027/28 and so we consider this element first. Three separate planning permissions have been approved, the first for 180 homes on land at Pewterspear Green Road, the second for 370 homes at Appleton Cross and 400 homes at Grappenhall Keys, activity has already commenced on site, with various reserved matters and condition discharge applications having been submitted and so the initial lead in time relating to this site is considered appropriate.

2.30 The housing trajectory then anticipates that all 772 dwellings will be completed by 2027/28 and Redrow consider that it is realistic for the full yield to be delivered within the plan period.

2.31 In respect of lead in times, Redrow felt that 2024/25 was an appropriate timescale for first completions on the Green Belt land in the 2019 consultation response and the Housing Trajectory at Appendix 1 of the WLP states 2025/26 for first completions, which accounts for the delay in Local Plan production. A reasonable lead in timeframe has therefore been anticipated.

2.32 Delivery rates as high as 225 per annum were included within the 2019 Housing Trajectory, but the maximum yearly completion rate is now anticipated to be 180 units per annum, which more closely aligns with the maximum 171 units per annum that Redrow felt was achievable based upon industry evidence and their own experience of delivering housing on strategic sites in the north west, such as Buckshaw Village.

2.33 Redrow also benchmarked their assumptions with the delivery rates achieved at Chapelford Urban Village. The site initially obtained planning permission in 2002, first completions were in 2004 and a total of 2,110 homes were subsequently delivered up until 2017. Over a period of 13 years therefore, an average build

rate of 162 dpa was achieved at Chapelford, which is entirely consistent with the evidence presented here by Redrow in respect of the anticipated rate of delivery at the SEWUE, i.e. 171 dwellings per annum.

- 2.34 Whilst the delivery rates are slightly higher than Redrow's anticipated 171 completions per annum, they are not drastically in excess of this and so it is considered a reasonable approach has been taken. Redrow's view in respect of the quantum of housing that will realistically be delivered at the SEWUE during the plan period 2021 to 2038.

Fiddlers Ferry Power Station

- 2.35 Fiddlers Ferry is a relatively new inclusion within the WLP having not been identified as a site capable of helping to meet Warrington's housing and employment needs at any stage of the local plan preparation process until the Regulation 19 stage. It has been included at the expense of other sites, such as Port Warrington, which was proposed to deliver 75 hectares of employment land and a reduction of 1,800 homes at the Garden Suburb in South Warrington, along with a general reduction in the amount of land to be removed from the Green Belt for housing. Redrow have some concerns in respect of the inclusion of the Fiddlers Ferry site.
- 2.36 To justify the inclusion of Fiddlers Ferry, the evidence base includes a Masterplan (April 2021), Regeneration Vision (August 2021) and a Density Assessment (April 2021), all of which have been prepared by SLR on behalf of the landowner Scottish and Southern Energy Plc. These documents were therefore not prepared with input from an experienced land promoter or developer and so it is questionable as to whether what is proposed is actually deliverable and viable. It is currently claimed that Fiddlers Ferry will deliver 1,310 homes and 101 hectares of employment land during the plan period.
- 2.37 It is clear from reading the above supporting evidence base documents that detailed technical work to inform feasibility and viability considerations has not been undertaken on what is an extremely complex site. For example, critical to the delivery of the housing proposed to the south of the railway line will be the ability to access the land. A bridge is currently in situ across the railway line, however this incorporates a number of pipelines and it is clear from the Regeneration Vision document that no technical feasibility work has been undertaken to assess the capability of the bridge to accommodate the traffic and vehicle movements necessary to serve the site. If the bridge needs replacing this represents a significant cost that

could have a severe impact upon the ability to deliver housing to the south of the railway line on a viable basis.

- 2.38 The main complex of the Power Station site is identified as a Defined Employment Area in the current development plan, with the land to the immediate east and land to the south of the railway line designated as Green Belt. A Green Belt Assessment of the Fiddlers Ferry site has therefore been undertaken and it concludes that the Green Belt land to the north of the railway line makes a 'Strong Contribution' to the Green Belt and the land to the south of the railway line a 'Moderate' contribution. With reference to the 2016 Green Belt Assessment, just 5 of the 25 parcels assessed at Stage 1 made a Strong Contribution, one of which was the northern parcel at Fiddlers Ferry as it provides a critical separation function between Warrington, Widnes and Runcorn. None (or no part) of the other four Stage 1 Parcels considered to make a 'Strong Contribution' towards the Green Belt have been identified for release. Redrow therefore question the approach being taken at Fiddlers Ferry from a Green Belt perspective as it is inconsistent with previous stages of the Local plan preparation process, which have avoided the release of critical locations that make a 'Strong Contribution' to the five purposes of the Green Belt.
- 2.39 The decommissioning of the existing Power Station, the land remediation necessary and the key infrastructure needed to deliver the scale of development proposed will have a major impact on viability. In the absence of a detailed Viability Appraisal demonstrating that the quantum of housing and employment land proposed can be delivered, and notwithstanding the concerns outlined above, Redrow question the inclusion of Fiddlers Ferry at this late stage of the process in the absence of compelling evidence to the contrary.

f) Each of the site allocations in outlying settlements

- 2.40 Redrow has no specific comments in response to this question.

Question 3. Would there be an adequate supply of housing land for the whole plan period?

- 2.41 Redrow have some fundamental concerns with regards to how the overall housing requirement is proposed to be met. The primary area of concern is the anticipated yield of housing that is being claimed to be delivered within the existing urban areas (and particularly within Warrington Town Centre).

- 2.42 This is particularly important in Warrington because the Council acknowledge that despite the anticipated yield of housing coming forward from the urban area, exceptional circumstances still exist to require the release of land from the Green Belt to meet future housing needs. Warrington can currently only demonstrate a 3.4 years housing land supply and has a 2021 Housing Delivery Test measurement of 72%, which further confirms the concerns Redrow has.
- 2.43 Should this source of housing land supply fail to deliver the anticipated yield, the Local Plan will not be able to provide the necessary flexibility to respond to change over time as more land would be required to be released from the Green Belt through a further Local Plan review, which is contrary the presumption in favour of sustainable development at paragraph 11 of the NPPF.
- 2.44 This is therefore a matter that goes to the heart of the soundness of the Plan.
- 2.45 Redrow also has concerns regarding the identification of Fiddlers Ferry as a housing site being capable of delivering 1,310 homes at a late stage of the plan preparation process. There is insufficient technical evidence provided to demonstrate that development of the site is viable and achievable. Stage 1 of the Green Belt Assessment concludes that the northern parcel of land proposed to accommodate some of the new housing makes 'Strong Contribution' towards the purposes of including land within the Green Belt. Identifying this site as a Housing Allocation is contrary to the approach taken elsewhere and cannot be justified.

Question 4. Overall, would at least 10% of the housing requirement/target be met on sites no larger than one hectare (in light of paragraph 69 of the NPPF)?:

- 2.46 Redrow has no specific comments in response to this question.

Question 5. In terms of a five year supply and paragraph 74 of the NPPF, is a 20% buffer appropriate?

- 2.47 Redrow consider that a 20% buffer is entirely appropriate as the 2021 Housing Delivery Test measurement of 72% confirms that there has been significant under delivery of housing over the previous three years and so the presumption in favour of sustainable development applies. This HDT result also shows consistency with previous HDT measurements in 2020 (57%) and 2019 (52%).

Question 6. Taking 2022/23 as the base year, what would be the five year requirement (assuming the stepped annual requirement and adding any shortfall or subtracting any surplus in delivery since 2021 before applying a buffer)?

2.48 Redrow has no specific comments in response to this question.

Question 7. What would be the supply for this period (in total and by each source of supply)?

2.49 Redrow has no specific comments in response to this question.

Question 8. Are the assumptions on the sources of supply for this period realistic and justified?

2.50 As set out in response to Question 2 above, Redrow has significant concerns in respect of the assumptions reached in respect of various sources of housing supply, in particular SHLAA sites without planning permission (in the Town Centre in particular) and the Main Development Areas of Waterfront and Fiddlers Ferry.

2.51 The Housing Trajectory at Appendix 1 to the WLP should be amended in line with Redrow's recommendations and new sites would therefore need to be released from the Green Belt in order to make up the shortfall that exists.

9. Would there be a five year supply of housing land (from 1st April 2022)?

Redrow has no specific comments in response to this question.

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Matter 8 – Housing Land Supply