

Warrington Local Plan EiP.

Matter 8: Housing Land Supply.

On behalf of Taylor Wimpey (Respondent Ref Number: 1427)

Date: 05 August 2022 | Pegasus Ref: P20-3147 / R0016v1 / PL

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1. Matter 8 – Housing Land Supply

Issue – Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach to housing land supply.

- 1.1. The following comments should be read in conjunction with our representations, notably:
 - Our response to Policy DEV1 – Housing Delivery (**UPSVLP 1427, P5**)
 - Our housing land supply assessment (**UPSVLP 1427, P4**)
- 1.2. The 2021 Strategic Housing Land Availability Assessment (SHLAA) (**H4/H4a**) is not set out in a transparent, accessible, and clear format. The Council are not seeking to allocate many urban sites and there is no clear depiction for the public as to where a very large proportion of housing growth is expected to take place other than the expansive settlement boundary itself. This is compounded by the fact that there are no maps in the proforma at Appendix 1 of the 2021 SHLAA and whilst links are provided to the Council's interactive mapping, it does not direct to the SHLAA sites themselves. As such, the SHLAA is very hard to navigate.
- 1.3. It is set out in the 2021 SHLAA that there is a spreadsheet which contains information guided by the Planning Practice Guidance, which has informed the site proforma which are provided at Appendix 1 of the 2021 SHLAA¹. This spreadsheet may have assisted our assessment of the SHLAA sites, but a copy is not available. We also requested a copy of the spreadsheet from the Council during the second Regulation 19 consultation, but to no avail.
- 1.4. In certain instances, there are also discrepancies with references in the 2021 SHLAA and the Council's interactive mapping. For example:
 - The proforma at Appendix 1 of the SHLAA refers to SHLAA 2673a and 2673b whereas the interactive mapping refers to 2673, 26732 and 26733; and
 - The proforma at Appendix 1 of the SHLAA refers to SHLAA 2672a, 2672b, 2672c, and 2672d whereas the interactive mapping refers to 26721, 26722, 26723 and 26724.
- 1.5. It is also not transparent from the information within the 2021 SHLAA which sites benefit from full or outline planning permission (or are simply subject to a planning application) and therefore it is not entirely clear how certain sites have been considered in the context of the deliverable and developable tests set out in the National Planning Policy Framework (NPPF).

Q1. What is the up to date situation regarding actual housing completions so far in the plan period i.e. 2021/22?

- 1.6. No comment.

Q2. 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

¹ H4, para 2.22



rates of delivery? What is the basis for these assumptions and are they realistic and justified?

- a) SHLAA sites under construction;
- b) SHLAA sites with planning permission but not started (split by outline and full);
- c) SHLAA sites without planning permission.

- 1.7. At the time of the second Regulation 19 consultation the 2020 SHLAA was available (although was not included in the evidence base documents). The Council's Housing Trajectory showed that 6,992 homes would come forward from SHLAA sites within the wider urban area over the plan period.
- 1.8. It was set out in our representations that this was overly optimistic since many sites were not being promoted by the land owner, were occupied by viable businesses with existing leases, and did not have planning permission. Whilst we accept that this may not prevent certain sites from coming forward within the plan period, one must also apply a pinch of reality. Not all SHLAA sites identified will become available for development for very valid reasons.
- 1.9. Our housing land assessment listed the SHLAA sites without developer interest and SHLAA sites with no planning permission and set out that not all sites with planning permission would materialise into a start on site. At the time, a total of 840 homes had no landowner or developer interest and 2,777 homes had no form of planning permission.
- 1.10. Rather than discount each site one by one, we applied a 25% reduction to account for the likely probability that not all sites listed would become available. This reduced the Council's claimed supply from SHLAA sites within the wider urban area from 6,992 to 5,230 homes over the plan period (i.e. **-1,762 homes**).
- 1.11. The 2021 SHLAA has been submitted with the examination documents. It still suggests that 6,992 homes will come forward from SHLAA sites within the wider urban area over the plan period. As such, there is no movement on the Council's position and therefore we maintain our position within our representations.
- 1.12. The following table demonstrates why caution needs to be applied to the Council's assumption that 6,992 homes will come forward from SHLAA sites within the wider urban area.

SHLAA Ref	Site Name	SHLAA Capacity	Pegasus Comment
Examples of SHLAA Sites where unrealistic assumptions are made on availability			
2482	Wharf Ind. Estate	129	This is an occupied industrial estate with many independent units and a range of ownerships and lease arrangements in place.

			<p>Recent applications have been granted as recently as 2019 to replace certain units with newer employment unit.</p> <p>There is no evidence of developer interest according to the 2021 SHLAA.</p> <p>The southern portion of the site is within the ownership of Langtree who are currently marketing the site for commercial and industrial use. Notwithstanding that, we consider that residential development would be constrained here, owing to the proximity of industrial uses in the northern portion of the site (which are occupied and in various freehold ownerships).</p>
2481	Hopwood St, School Brow, Crossley St	109	This site is occupied by viable businesses including Farmfoods (who signed a new lease in 2020 for 15 years with scope to renew) and the recently established Formula One Autocentre.
2672c-d	Arpley Road	235	These sites are occupied by viable businesses including Go Outdoors and builder's merchants.
2676a-b	Scottish Power / Causeway Park	184	<p>These sites are within several ownerships and occupied by various businesses.</p> <p>There is no evidence of landowner promotion according to the 2021 SHLAA.</p>
1733	Hall Motors Site	31	<p>This site includes the Suzuki Garage.</p> <p>There is no evidence of developer interest or landowner promotion according to the 2021 SHLAA.</p>
<p>Examples of SHLAA Sites where scale and deliverability Issues are not fully addressed/confirmed</p>			
1401	Warwick Street	550	<p>Whilst we note there is a current outline application, this has yet to be determined.</p> <p>The number of dwellings set out in the 2021 SHLAA reflects the number of homes associated with the application and whilst we recognise that is an obvious starting point, the application has not been approved, is only at the outline stage, and there is no clear evidence that there will be market demand for this many apartments within the town centre.</p>

2673a-b	New Town House / Land at Scotland Road	900	<p>This is another significant apartment scheme within the town centre that has yet to gain outline permission. We note that the Council own New Town House.</p> <p>The SHLAA states commencement by 26/27, which is not deemed to be realistic in light of limited past evidence that this scale of apartment development being viable in Warrington at this stage.</p> <p>The number of dwellings set out in the 2021 SHLAA reflects the number of homes associated with the application and whilst we recognise that is on obvious starting point, the application has not been approved, is only at the outline stage, and there is no clear evidence that there will be market demand for this many apartments within the town centre.</p>
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- 1.13. The first five sites listed are not supported by any evidence from the Council that businesses expect to depart these sites during the plan period and that there is a reasonable prospect of them becoming available at the point envisaged. We anticipate there will be other similar instances within the 2021 SHLAA.
- 1.1. We also question the suitability of other SHLAA sites for residential use within flood zone 3 including:
- 1041 – Harry Cloughfold – 64 homes
 - 1620– Recycling premises – 11 homes
 - 1715 – Spectra Building & Drivetime Golf Range – 513 homes
 - 2704 – Land at Boarded Barn Farm – 4 homes
 - 3474 – Blackburn Arms PH – 23 homes
 - 3568 – Warrington Borough Transport Depot – 153 homes
- 1.2. It is also questionable whether the following SHLAA sites would add to the residential stock, and to what extent, given they are currently in use as care homes:
- 3357 – Old Rectory – 15 homes
 - 3505 – 8 Bewsey Road – 14 homes
 - 3606 – Broomfields – 51 homes
- d) Small site allowance (windfalls)**
- 1.3. It was set out in our representations that the flat delivery of the small sites allowance over the entire plan period is overly optimistic and that it was appropriate to reduce the delivery

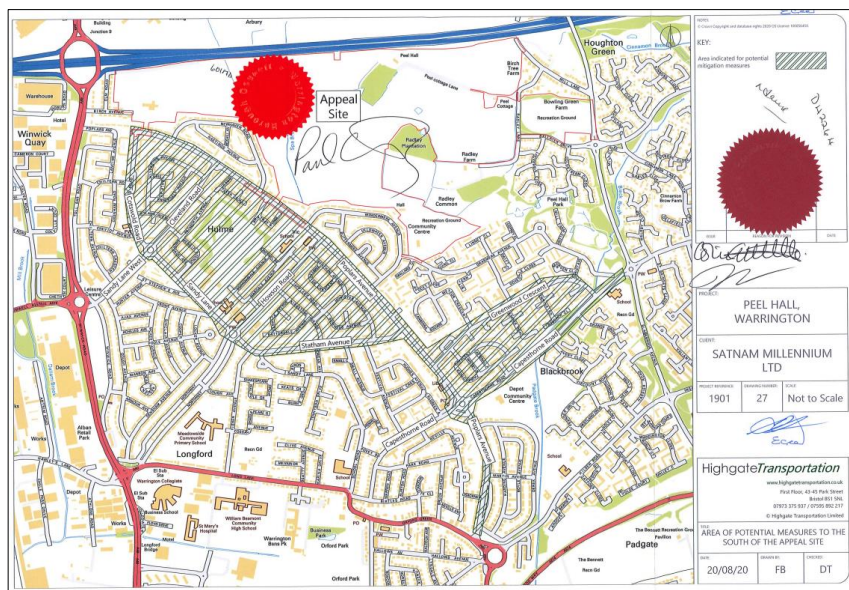
from this element of the supply towards the latter end of the plan period. As such, we considered it reasonable to apply a reduced rate of 50 homes per annum from 2031/2032. Applying this reasonable assumption reduced the Council's claimed supply from this source from 1,458 homes to 1,210 homes over the plan period (i.e. 248 homes less than claimed).

- 1.4. Small sites are finite and the supply of homes from this source should naturally fall over time as sites get developed. It is therefore questionable whether any small sites would contribute to the housing land supply at a flat rate of 81 homes over the plan period, as set out in the Council's Housing Trajectory.
- 1.5. Whilst we note that the 2021 SHLAA shows that on average over the past 10 years small sites have delivered 90 homes per year (which is an increase on the 81 homes identified at the time of the 2020 SHLAA), the fact remains that the delivery of such sites should fall over time.

e) Each of the Main Development Areas involving housing

Peel Hall

- 1.6. The Council's Housing Trajectory is showing first completions from 2026/27. This is overly optimistic on the basis that the outline permission has 53 planning conditions and requires Road Safety Audits and Traffic Regulation Orders (TRO).
- 1.7. We also note that the s106 legal agreement requires an off-site highways mitigation scheme which must set out the expectant highway's impacts of the development on the off-site highways area and other potential off-site highways works (legal orders (20mph speed limit extension, waiting restrictions, establishment of road humps, as necessary), raised tables, round top road humps, TRO signate and other signage, uncontrolled crossing points along Poplars Avenue, Road Safety Audits etc.).
- 1.8. These could be tricky and lengthy matters to work through owing to the significant level of opposition of the outline application, including by the Council's highways officers.



Off-Site Highways Area edged and hatched green (extract from s106 legal agreement)

Warrington Waterfront

- 1.9. In our representation we considered it appropriate to apply a build rate of 57 homes per annum (based on the evidence in the 2020 SHLAA) at SHLAA 1633 since there was no evidence then (or now that we can find) to suggest that the claimed build rates set out in the Council's Housing Trajectory, could be achieved.
- 1.10. Policy MD1 – Warrington Waterfront says that no development will be permitted until funding has been secured and a programme of delivery has been confirmed for the Western Link.
- 1.11. In our representations we applied realistic start on site at Warrington Waterfront to tie it in with reasonable assumptions about when the funding for the Western Link may be confirmed and when permission may be secured thereafter.
- 1.12. The Council has since acknowledged in their response to Matter 6a (**M6a.01**) that there has been a delay at Warrington Waterfront owing to an increase in scheme cost of the Western Link. The Council now anticipate the first homes to be completed in 2029/30 (as opposed to 2027/28 as set out in their Housing Trajectory). As such, an adjustment will be required to the Housing Trajectory in this regard.
- 1.13. The Council have suggested in their response to Matter 6a that in the event there is a more significant delay to the Western Link programme they will address this through a future review of the plan and that they are confident that there would be sufficient time to undertake a review prior to address any issues with the s housing land supply.
- 1.14. We consider 2029/30 to still be overly optimistic for the reasons set out in our housing land supply assessment as well as the fact that an EIA will be required to support the planning application(s) and given that the Sports England objection to the loss of playing fields will need to be overcome. These issues should be addressed now with an appropriate contingency drafted into the plan and not simply pushed to a review of the plan.

South East Warrington Urban Extension

- 1.15. In our representations we considered it appropriate to apply a build rate of 57 homes per annum (based on the evidence in the 2020 SHLAA) (assuming two outlets on the Homes England land and an outlet on the Miller Homes land) since there was no evidence then (or now that we can find) to suggest that the claimed build rates set out in the Council's Housing Trajectory, could be achieved.
- 1.16. In our representations we also considered it appropriate to apply a start on site of 2030/31 on the Homes England land to reflect our evidence on past delivery on Homes England sites, which we still consider appropriate.

Fiddlers Ferry

- 1.17. For the reasons set out in our response to Matter 6c (**M6c.09**) we are strongly of the view that the housing elements of Fiddlers Ferry should be removed as an allocation in the plan.

f) Each of the site allocations in outlying settlements

- 1.18. No comment until we see the Council's response on this matter.

Q3. Would there be an adequate supply of housing land for the whole plan period?

- 1.19. There will not be an adequate supply of housing land for the whole of the plan period, for the reasons set out above. Additional land needs to be allocated to address housing needs due to the fact that a) a number of SHLAA sites in the wider urban area will not be available b) owing to the issues associated with the delivery at Peel Hall, Warrington Waterfront and the South east Warrington urban Extension and c) the fact that the housing element at Fiddlers should be removed as an allocation in the plan.

Q4. 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)

- 1.20. No comment.

Q5. In terms of a five year supply and paragraph 74 of the NPPF, is a 20% buffer appropriate?

- 1.21. Yes, a 20% buffer is appropriate owing to the latest Housing Delivery Test measurement being 72%.

Q6. 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)?

- 1.22. No comment.

Q7. What would be the supply for this period (in total and by each source of supply)?

- 1.23. No comment.

Q8. Are the assumptions on the sources of supply for this period realistic and justified?

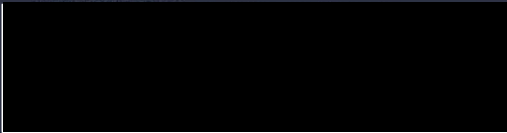
- 1.24. No comment.

Q9. Would there be a five year supply of housing land (from 1st April 2022)?

- 1.25. We note that the Council confirm there is a 3.9-year supply in the 2021 SHLAA, indicating that there is a lack of immediately deliverable land for housing development within Warrington. This is not entirely surprising given the lack of a full housing chapter within the adopted development plan and the constraints imposed by tight Green Belt boundaries around the urban area and outlying settlements.
- 1.26. The land being promoted by Taylor Wimpey at **Stock Lane, Penketh** (SHLAA 316) should be considered as a deliverable and developable site (for the reasons set out in the representations) which could start to deliver early in the plan period.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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