

Warrington Local Plan Examination

Matters Statements

MATTER 9 - OTHER HOUSING POLICIES

August 2022

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Issue

Whether the Local Plan is justified, effective and consistent with national policy in relation to the approach to housing density, meeting housing needs and Gypsy, Traveller and Travelling Showpeople provision.

(NB. Examination Library reference numbers are provided in brackets after each document referred to in the Matters Statement)

Relevant policies DEV1 to DEV3

Questions

Housing density (Policy DEV1 parts 5 and 6)

- 1. What is the basis for the minimum densities set out in Policy DEV1? Are they realistic and justified?**
 - 1.1 Paragraph 125 of the NPPF indicates that where there is an existing or anticipated shortage of land for meeting identified housing needs, planning policies should avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. Furthermore, it advises that plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport; and for other parts of the plan area as well (Parts (a) and (b) of paragraph 125).
 - 1.2 The densities set out in Parts 5 and 6 of Policy DEV1 are based on work that was undertaken for the purposes of determining site capacities when up-dating the Council's Strategic Housing Land Availability Assessment (SHLAA), as a result of comments made through the Local Plan Preferred Development Option (PDO) Consultation. This work outlined in more detail in paragraphs 2.51 to 2.53 of the SHLAA 2021 (H4).
 - 1.3 Based on ongoing analysis through the annual SHLAA process, a minimum of 30dph is considered appropriate and deliverable in wider urban area of Warrington, rising to a minimum of 50dph on sites in proximity to Warrington Town Centre, the Borough's District Centres and in other accessible locations.
 - 1.4 Town Centre densities have been reviewed in detail given concerns over the deliverability and viability of higher density, flatted schemes. As paragraph 2.52 explains, sites within the Town Centre often achieve densities far greater than the proposed 130dph minimum requirement in Part 5(a) of Policy DEV1, with the

average being 275dph. In some instances schemes have achieved densities of close to 400dph and in one case in excess of 600dph.

- 1.5 In response to representations on the UPSVLP (2021), questioning the viability of higher density town centre residential schemes, The Council produced an addendum to its Local Plan Viability Assessment (V1) which provides additional detail to demonstrate the viability of different types and sizes of development across the Borough, including those in the Town Centre and Inner Warrington. The Council is confident these sites will come forward and will compliment suburban and Green Belt release sites which together will provide a wide range of housing types to meet Warrington's needs.
- 1.6 The Council is also in the process of updating its Housing Strategy which is considering other means available to the Council to encourage the construction of permitted housing developments in the central area, such as offering low cost loans for deposits or low cost mortgages for eligible households, thereby bolstering the market for Town Centre homes.
- 1.7 It is therefore considered that the proposed densities in Policy DEV1 (Parts 5 and 6) are entirely realistic and justified.

2. How will "locations that are well served by frequent bus or train services" be defined and is this sufficiently clear?

- 2.1 The Council acknowledges that there is no specific definition in the Plan to define areas that are well served by frequent bus or train services. Additional supporting text to the Policy could be provided to provide this definition, based on the SA Framework set out in the SA Report (SD3).
- 2.2 The SA Framework gives the highest grading to sites within 200m of a bus stop which has at least 3 bus services per hour. With regard to trains, Warrington Central, Bank Quay and Birchwood are the stations that have more than one service per hour throughout the day with Padgate and Warrington West having more than one an hour during peak. The SA framework gives this highest grading to sites within 1,200m of a station.
- 2.3 Whilst the SA Framework provides the basis to define accessible locations, it will still be necessary to consider the context of the site. As such, the Council is also proposing a modification to Part 6 of the Policy to confirm that it applies to each of the densities set out in Part 5. It is also proposed to modify Part 6 (c) to clarify that 30dph is the minimum density for all parts of the Borough which are not covered by parts 5(a) and (b). The suggested modifications are provided under the response to question 22.

3. Is the policy sufficiently flexible to allow particular circumstances to be taken into account?

- 3.1 Part 5 of Policy DEV1 only requires new development to “aim to achieve” the specified minimum densities. Part 6 of Policy DEV1 allows densities of less than 30dph where it can be demonstrated that a lower density is necessary in order to achieve clear planning objectives.
- 3.2 Therefore, it is considered that Policy DEV1 (Parts 5 and 6) strikes an appropriate balance between achieving the aims of paragraphs 124 and 125 of the NPPF (subject to the proposed modifications set out in the response to question 2 above); is not overly prescriptive and is sufficiently flexible to allow particular circumstances to be taken into account.

Meeting housing needs (Policy DEV2)

4. What is the evidence in terms of affordable housing need and what does it show?

- 4.1 An independent review of the Borough’s housing need over the Local Plan period was undertaken by GL Hearn on behalf of the Council. Section 8 of this Local Housing Needs Assessment 2021 (H2) specifically considers affordable housing need, using methodology consistent with that set out in PPG ‘Housing and Economic Needs Assessment’ (as explained at paragraph 8.4 et seq. of the Assessment). The analysis is split between a need for social/affordable rented accommodation and the need for affordable home ownership. The latter includes housing for those who can afford to rent privately but cannot afford to buy a home.
- 4.2 The analysis suggests a need for 423 affordable rented homes per annum, with a need for such properties demonstrated in all parts of the Borough. The gross need, from an estimated 1,031 households, appears to be in decline; the ability of the existing affordable rented stock to meet that need through the recycling of properties, however, is in greater decline (estimated at an average of 608 units annually), leading to an increased net need for such accommodation. The analysis suggests that there will be a need for both social and affordable rented housing – the latter will be suitable particularly for households who are close to being able to afford to rent privately and also for some households who claim full Housing Benefit.
- 4.3 In relation to affordable home ownership, the analysis also suggests a need across the Borough, albeit (at 267 dwellings per annum) the need is lower than for rented housing. In interpreting this figure, it should however be noted that there could be additional supply from resales of market homes (below a lower quartile price) which would mean the need for new affordable home ownership products is negated.
- 4.4 Evidence does suggest that there are many households in Warrington who are being excluded from the owner-occupied sector, as demonstrated by reductions in owners with a mortgage and increases in the size of the private rented sector. This suggests that a key issue in the Borough is about access to capital for deposits, stamp duty and legal costs, as well as potentially mortgage restrictions rather than simply the cost of housing to buy.

4.5 Overall, the analysis identifies a notable need for affordable housing and it is clear that provision of new affordable housing is an important and pressing issue in the Borough. The interrelationship between affordable housing need and the overall housing requirement is considered under Matter 4.

5. What are the past trends in affordable housing delivery in terms of completions and housing forms? How is this likely to change in the future?

5.1 Warrington’s most recent Annual Monitoring Report was published in May 2022 (CD01) and this provides the latest position on the delivery of affordable homes for the period 2020 to 2021 – 100 affordable units were delivered in this period. Affordable completions dating back to 2004 are shown below.

Year	Total Housing Completions (Net)	Affordable Housing Completions
04/05	1065	43
05/06	1269	125
06/07	1362	132
07/08	1565	323
08/09	633	141
09/10	388	133
10/11	527	291
11/12	600	187
12/13	647	227
13/14	693	202
14/15	687	101
15/16	595	162
16/17	513	72
17/18	359	86
18/19	503	112
19/20	541	131
20/21	573	100
Total	12,520	2,568

5.2 The Council does not currently monitor the types of affordable housing delivered so is unable to provide a breakdown of these figures. The general trend in Warrington has been to provide a range of dwelling types for affordable home ownership or homes for affordable rent, often managed by Registered Providers.

5.3 The above table demonstrates that the Council has been broadly consistent in delivering affordable homes as a proportion of overall homes delivered and the provisions in Policy DEV2 will ensure that this continues. Indeed with an overall housing target of 816 dwellings per annum, an increase in the amount of affordable housing delivered is expected when delivery over recent years is considered.

6. Should the threshold for seeking affordable housing reflect the definition of major housing development in the NPPF i.e. 10 dwellings or more or a site area of 0.5ha or more?

6.1 The NPPF makes it clear that affordable housing should be provided on major residential schemes and not minor developments (under 10 homes). The Council considers that this threshold is appropriate and realistic in that it will ensure the delivery of affordable units on sites or developments which are significant enough in scale to have the ability to provide some affordable units, subject to other viability considerations. This has been tested through the Local Plan Viability Assessment 2021 (V2).

7. What is the basis for the percentages of affordable housing sought and are they justified?

7.1 Policy DEV2 requires that 30% affordable housing is provided in the majority of Borough, excluding brownfield sites in Inner Warrington and the Town Centre where 20% affordable housing is to be provided. This recognises the lower level of viability in Inner Warrington in accordance with the Local Plan Viability Assessment 2021 (V2). The Council has also based this requirement on experience of delivery of affordable housing over recent years, as required by the adopted Warrington Local Plan Core Strategy 2014, and considers it remains an appropriate basis going forward.

7.2 In terms of the types of affordable homes to be provided, the LHNA 2021 (H2) identifies that the majority of affordable housing need in Warrington is for affordable homes for rent. Securing affordable homes for rent is therefore the Council's priority. Taking into account the minimum provision of low cost home ownership in accordance with the NPPF, this means in Inner Warrington the Council will seek a 50/50 split between rented and low cost home ownership, with a 67/33 split in all other areas.

7.3 The Council has considered the Borough's total affordable housing need in the context of its likely delivery through Policy DEV2. If the full need was to be met in this way then this would require a significant increase to the overall housing requirement to a level comparable to that which raised significant environmental concerns when assessed as part of the Preferred Development Option 2017 and later at the Proposed Submission Version Local Plan consultation in 2019. Any significant increase would also require housing to be delivered at a consistently higher rate than Warrington has achieved historically. The Council is therefore not proposing a further uplift to its proposed housing target of 816 dwellings per annum. Further detail on this is provided in the Council's Statement on Matter 4.

7.4 It should be noted that there is now evidence in the Borough of Registered Providers using grant funding to deliver additional affordable homes on private development sites, over and above those secured through S106.

7.5 The Council considers that the percentages of affordable housing sought are realistic and deliverable when viability considerations and previous delivery rates are taken into account and the requirements are therefore fully justified.

8. Does the evidence on viability support the approach to affordable housing in Policy DEV2?

8.1 The Local Plan Viability Assessment 2021 (V2) has demonstrated that in broad terms the level of affordable housing sought is viable and deliverable. Given concerns raised around viability in responses to the consultation on the Updated PSVLP (2021), the Council has undertaken an addendum to its Local Plan Viability Assessment (V1). This demonstrates credible scenarios in more detail where affordable housing can be delivered in areas where viability may be more challenging, including in the Town Centre and in Inner Warrington.

9. Is there sufficient flexibility to take account of site specific viability issues?

9.1 Yes, the Council considers that Part 8 of Policy DEV2 provides sufficient flexibility to take account of site specific viability issues.

10. In other respects, is the approach to affordable housing justified, effective and consistent with national policy?

10.1 Yes, the Council considers that taking into account the NPPF affordable housing threshold, guidance in the PPG, the Local Housing Needs Assessment 2021 and the Local Plan Viability Assessment 2021, the proposed percentage target of 30% in the majority of Borough and 20% on brownfield sites in Inner Warrington and the Town Centre is appropriate to Warrington’s local circumstances.

11. Is the approach to the mix of housing sizes and types justified? Is it intended to apply this policy to all developments regardless of size?

11.1 The LHNA 2021 (H2) has made an assessment of housing need by both tenure and type of housing. This is broken down by dwelling size and also market housing, low cost home ownership and affordable rent. Demand identified in the Borough is summarised below.

	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms
Market	5%	30%	50%	15%
Affordable home ownership	20%	40%	30%	10%
Affordable housing (rented)	40%	30%	25%	5%

11.2 There is a notable demand in Warrington for 1 and 2 bed affordable rented properties, particularly for young families and a shortage of 2 and 3 bed houses for affordable home ownership. In the market sector, a balance of property sizes is required that takes account of current demand and the changing demographic

profile over the Plan Period, along with the loss of social rented family homes to Right to Buy. This includes a proportion of 2 bedroomed market properties for which there is a demand in Warrington as there is a low level of existing stock.

11.3 The Council therefore considers that reference to these needs is important in Policy DEV2, however the policy does not go as far as requiring a specific mix but rather suggests that the proposed mix is informed by the demand information identified. This will allow for some flexibility depending on the scale of development proposed, its location and other relevant factors. The onus will be on the developer/applicant to demonstrate any variation from the need evidenced in the LHNA 2021.

12. Is there justification for the use of Nationally Described Space Standards in terms of need and the effect on viability?

12.1 To ensure that new dwellings are appropriately sized and arranged to create well designed homes, the Council is proposing to include a requirement for new development to adhere to Nationally Described Space Standards (NDSS). Local planning authorities that wish to implement the requirement for NDSS can only do so by a specific policy in an adopted local plan. This aligns with one of the Borough's key corporate policies to provide decent homes to all.

12.2 National planning policy and guidance does not provide for a detailed methodology or criteria on what evidence is required to demonstrate the need for the application of NDSS. The Council intends to use NDSS as a benchmark and seeks to implement these and champion good design principles in all new development.

13. How will "appropriate outdoor amenity space" be defined?

13.1 Space around dwellings can be an important element in establishing and retaining the character of an area. This may be space to the front, sides or rear of a development or properties and therefore proposals would be expected to reflect regular layouts as set out in Policy DC6. It is anticipated that the Design and Construction SPD (SPD4) will be updated following adoption of the Local Plan to provide guidance for major new developments or for instances where streets are less regular.

14. Are the requirements for Accessible and Adaptable dwellings and Wheelchair User dwellings justified and consistent with national policy? How has the effect on viability been taken into account?

14.1 The NPPG provides the basis for the Council to set standards relating to the optional standard M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. In this instance, the Borough has an aging population and, over the course of the Local Plan period, the proportion of people aged over 65 is anticipated to grow by nearly 40%. As such, there is a real possibility that without intervention the Borough's housing stock will not meet the needs of its population over the course of the next twenty years. The Council has used its Local

Housing Needs Assessment 2021 (H2) to set the percentage requirements for these standards and has tested these requirements through its Local Plan Viability Assessment (2021) (V2). In particular, it is considered that the M4(2) standard has a minimal increase in cost to developers, yet provides for homes to be accessible and adaptable in future allowing residents to stay in their homes for life.

14.2 The forecast changes in the demographic profile indicate a clear need to increase the supply of specialist accommodation and housing to be built to M4(2) and M4(3) housing technical standards. This will save the public purse by reducing the need to issue Disable Facilities Grants in order to adapt properties in the future.

14.3 The LPVA 2021 has modelled the full requirements of Policy DEV2 in this regard. Costs for satisfying the above requirements are derived from the DCLG – Housing Standards Review (September 2014). These have been indexed from September 2014 to April 2021 utilising the BCIS General Building Cost Index. The adopted costs are therefore as follows:

- M4(2) – £609 per house, £1,078 per flat
- M4(3) (Adaptable) – £11,921 per house, £9,048 per flat

14.4 The full policy requirements have been tested through the LPVA (2021) with the evidence demonstrating that there is no reason why the requirements specified cannot be included in Policy DEV2 as a starting point, with provision for incidences where they may be viability issues or otherwise.

14.5 The Council is confident that its approach is fully justified.

15. Is the approach towards housing for older people justified? How would part 18 of Policy DEV2 be implemented in practice, what is meant by housing for older people and to what extent is this issue covered by the approach to Accessible and Adaptable dwellings and Wheelchair User dwellings?

15.1 Warrington's older population is growing quickly and at a faster rate than the wider North West region and England as a whole. Over the Plan period the population of Warrington aged 75 or older is projected to increase by almost 50%. The Council's Families and Wellbeing Directorate is taking a proactive role to addressing this demand and the Local Plan will contribute to their wider delivery strategy.

15.2 The LHNA identifies the need for around 25% of new homes in Warrington to be provided to accommodate older persons and for an additional 1,053 bedspaces within extra care facilities (LHNA Table 48). Whilst the need for bedspaces needs to be addressed over the plan period, the Council's overall strategy to encourage more independent living will be an important factor in decision making, where this is appropriate.

15.3 The requirements for M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings) will have a positive impact in meeting older persons

needs over the Plan Period. The Main Development Areas also have specific policy requirements to make provision for specialist housing for older people.

- 15.4 Specialist homes for elderly people range from sheltered accommodation, residential care homes to extra care or adaptable homes depending on the nature of the site and proposals and demand in the local area. For residential care homes a minimum of 80-120 bedroom spaces would be needed to reach the necessary critical mass to run a 24/7 operation. For sheltered housing a smaller number of approximately 30 units (or fewer) is acceptable. Demand for smaller units has been highlighted by colleagues and partners in adult social care. In terms of location, extra care facilities should be located to ensure ease of access for visitors and to enable residents to access local services where appropriate. These will be dealt with on a site by site basis.
- 15.5 The Council considers that part 18 of Policy DEV2 sets out a clear requirements for some provision of housing for older people in major development schemes whilst recognising that the definition of this may vary. This allows for flexibility as to how the need will be addressed on a case by case basis.

16. Is the approach towards self and custom build housing justified? How will it be implemented?

- 16.1 From April 2016, Councils have been required to keep a register of people who are interested in self or custom build housing and plan accordingly to meet this demand. In line with the Government's aspirations to enable more people to build their own homes, the Council will consider applications for self-build properties favourably, having regard for all other policies in the Local Plan. Provision of self-build plots is a specific requirement of the Local Plan site allocations, subject to demand on the Council's register.

17. Is the approach towards Houses in Multiple Occupation justified? How will the criteria in part 21 of Policy DEV2 be applied and defined, particularly criterion a)?

- 17.1 Part 21 of Policy DEV2 is intended to manage HMOs coming forward in the Borough in response to specific development pressures in Warrington.
- 17.2 Criterion a) will be applied on a site by site basis, based on evidenced needs in the area as defined in the LHNA 2021 (H2).

Gypsy, Traveller and Travelling Showpeople provision (Policy DEV3)

18. Is the evidence on accommodation needs for Gypsies and Travellers and Travelling Showpeople robust and consistent with national policy and does it cover an appropriate time period?

- 18.1 The Cheshire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 2018 (CGT&TSAA) (GT1) was a joint study prepared by Opinion Research

Services on behalf of Cheshire East, Cheshire West and Chester, Halton, and Warrington Council's. The assessment takes account of the change to the definition of Travellers for planning purposes contained in the revised version of Planning Policy for Traveller Sites (PPTS) issued in August 2015 and identifies the likely permanent and transit accommodation needs of Gypsy and Traveller pitches and Travelling Showpeople plots in the study area for the 15-year period from 2017 up to 2032 as required by Policy A of the PPTS (with a split to 2030 to meet Local Plan periods for Cheshire East and Cheshire West & Chester).

- 18.2 The CGT&TSAA(GT1) has used a sound methodology to assess the position with regard to Gypsies and Travellers and Travelling Showpeople in Warrington. This is set out in detail in Section 3 of the CGT&TSAA(GT1). The CGT&TSAA(GT1) should be seen as a robust and comprehensive evidence-based assessment of the current and likely future need for accommodation for Travellers in Cheshire East who meet, or who may meet (unknown/undetermined households) the current planning definition of a Gypsy, Traveller or Travelling Showperson as set out in the PPTS. The approach taken is consistent with Paragraph 61 of the NPPF (2021) that asks that the housing need for different groups be assessed and reflected in planning policies. Footnote 27 of the NPPF (2021) confirms that Travellers housing needs should be assessed for those covered by the definition in Annex 1 of the PPTS.
- 18.3 It should be noted that both Inspectors at the Local Plan examinations in the adjoining authorities of Halton (Page 23; paragraph 111 of the Inspectors Report on the Examination of the Halton Delivery and Allocations Local Plan) and Cheshire East (Page 8 of the Inspector's Post Hearing Comments on Key Issues) accepted the CGT&TSAA(GT1) as providing a robust and up to date assessment of need for those authorities areas.
- 18.4 National planning policy (Planning Policy for Traveller Sites - DCLG, 2015) requires local planning authorities to make an assessment of the accommodation needs for Gypsy & Travellers and Travelling Showpeople and to meet that need through the identification of land for sites. More specifically, it requires local planning authorities to identify a supply of deliverable sites sufficient to provide 5 years' worth of sites against their locally set target and a supply of developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15 of their Local Plan. The Plan is considered to be consistent with the requirements of the PTSS in this regard as it identifies the need for at least 10 years of the Plan period (ie. From 2021 to 2032). Paragraphs 4.1.68 to 4.1.73 and the accompanying table (Table 4) of the UPSVLP 2021 (SP1) summarises Warrington's need requirements as identified in the CGT&TSAA (GT1).
- 18.5 Therefore the evidence base is considered to be robust and consistent with national policy and to cover an appropriate time period.
- 19. Is the approach to meeting needs set out in Policy DEV3 justified and consistent with national policy, including the reference to a review of the Local Plan? What is the up to date situation regarding the existing supply of pitches and plots?**

- 19.1 The PPTS states that local planning authorities should make their own assessment of need for the purposes of planning and that evidence should be used to plan positively and manage development. In accordance with the PPTS the Council has used robust, up to date evidence to establish accommodation needs and set pitch targets within Policy DEV3 as identified through the CGT&TSAA (GT1).
- 19.2 The approach taken is consistent with Paragraph 62 of the NPPF (2021) that requires that the housing need for different groups be assessed and reflected in planning policies. Footnote 27 of the NPPF (2021) confirms that Travellers housing needs should be assessed for those covered by the definition in Annex 1 of the PPTS.
- 19.3 As outlined in paragraph 18.4 above national policy (Policy B; Paragraph 10 of the PTSS) only requires local planning authorities to identify a supply of deliverable sites sufficient to provide 5 years' worth of sites against their locally set target and a supply of developable sites, or broad locations for growth, for years 6 to 10. The Plan is considered to be consistent with the requirements of the PTSS in this regard as it identifies the need for more than 10 years of the Plan period (ie. For 11 years, between 2021 to 2032).
- 19.4 Therefore, as the Plan is proposed to cover a much longer time period of 18 years and there is a specific requirement in paragraph 33 of the NPPF to review local plans at least once every five years, it is considered that the approach to meeting needs set out in Policy DEV3 is justified and consistent with national policy.
- 19.5 The up to date position in terms of pitches for Gypsy and Travellers and plots for Travelling showpeople has as identified in the UPSVLP (2021) (SP1) has changed slightly since it's publication.
- 19.6 Since the publication of the UPSVLP (2021) (SP1) a further planning consent (2021/40005) for a residential caravan site for 8 pitches has been granted. Whilst, the proposal was for an unrestricted consent for the stationing of caravans/mobile homes for residential occupation, the justification for the application was based on meeting the needs of Gypsy and Travellers that no longer meet the definition (ie. they have permanently ceased travelling). Therefore consent was granted on that basis and the use of the site restricted by condition (03) to being occupied by any persons that meet the current Gypsy Traveller definition contained in Annex 1 of the PPTS (2015) or those who no longer meet the definition but who still require culturally appropriate accommodation in Warrington.
- 19.7 Whilst the site could be occupied completely by Gypsy and Travellers who no longer meet the definition the likelihood is that at least a proportion of the site will be occupied by those that do meet the definition. Hence, the Council is confident it has met it's requirement in full for the provision of Gypsy and Traveller pitches for the period up to 2032.

20. Should sites be allocated in this Local Plan or provision made within proposed Main Development Areas and/or site allocations?

20.1 The updated position in terms of the identified need, outlined above, indicates that the Council has already met its identified need in full for Gypsy and Traveller pitches up to 2032 and it's need for Travelling Showpeoples plots up to 2027.

20.2 Therefore, it is considered that there is no need to specifically allocate sites in the Local Plan. The Council will however review this position as part of future reviews of the Local Plan.

21. Are the criteria for considering proposals for new sites justified?

21.1 The PPTS (Policy B: Paragraph 11) requires local authorities to set out criteria to guide land supply allocations where there is an identified need and to provide a basis for decisions where planning applications come forward. Policy DEV3 seeks to do this by listing the criteria that will be used in the determination of planning applications which may contribute to meeting any identified unmet need for both permanent and transit sites.

21.2 The criteria seek to ensure that sites are sustainable economically, socially and environmentally as well as seeking to address some of the wider problems facing the Gypsy and Traveller and Travelling Showpeople communities and protect the interests of the settled community, in accordance with Policy B: Paragraph 13 of the PPTS. In addition, the policy criteria in DEV3, in seeking to provide additional guidance on site specific and design factors including ensuring safe access/adequate parking, manoeuvring and servicing on the site; taking account of the impact on the character and appearance of the surrounding area; and access to local services amongst other criteria, are also consistent with the PPTS in ensuring sites meet the requirements of Policy H: Paragraph 26.

21.3 The approach to considering proposals for new sites set out in Policy DEV3 is therefore considered to be justified and consistent with national policy.

Main modifications

22. Are any main modifications to the above policies necessary for soundness?

22.1 As set out in the response to question 2, the Council is proposing the following modifications to Policy DEV1 and the supporting text to clarify the application of minimum density standards.

5c) At least 30dph on **all** other sites ~~that are within an existing urban area~~ **across the Borough**

6. Densities of less than **those specified in part 5 above** ~~30dph~~ will only be appropriate where they are necessary to achieve a clear planning objective, such as avoiding harm to the character or appearance of an area.

4.1.23 To ensure that land is used efficiently, Policy DEV1 encourages the use of high densities in appropriate locations, for example on sites that are close to town or district centres or to public transport facilities. **Sites that are considered to be well served by frequent bus or train services are those within 200m of a bus stop which has at least 3 bus services per hour or are within 1,200m of Warrington Central, Bank Quay or Birchwood railway stations.** Densities of less than 30 dwellings per hectare (dph) are discouraged except where there is a legitimate planning reason for them, for example to ensure that development integrates successfully with the prevailing built form of the area or to protect the historic environment. The density of development on the allocation sites should be at or above the minimum figures specified in the allocation policies.