



# Warrington Local Plan Examination in Public: Hearing Statement

Matter 9: Other Housing Policies

On behalf of Richborough Estates Limited.

In relation to land at Cherry Lane Farm, Lymm

Participant ID: 0430

August 2022

# CONTENTS

1	INTRODUCTION.....	1
2	HOUSING DENSITY .....	3
3	MEETING HOUSING NEEDS .....	4

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Version 2

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# 1 INTRODUCTION

1.1 Asteer Planning LLP has been instructed by Richborough Estates Limited (“Richborough”) to prepare this Hearing Statement in relation to the Updated Proposed Submission Version Local Plan (“SVLP”) and the Matters, Issues and Questions (“MIQs”) posed by the Inspectors.

1.2 Richborough controls the site at Cherry Lane Farm in Lymm (Site Number: 0430<sup>1</sup>) which has been promoted through the Local Plan process since 2017. The site is wholly deliverable (being suitable, available and achievable) for residential development and could deliver significant public benefits, as demonstrated robustly by the evidence presented in duly made representations in June 2019 and in November 2021 (Rep ID number: 0430/07).

1.3 In relation to Matter 9, the Inspectors have raised the following 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.”*

1.4 This Statement responds directly to the Inspectors’ MIQs; however, it should be read in parallel with previous representations. Separate statements have been prepared in respect of the following matters and should be read in conjunction with this statement:

- Matter 3 (Spatial Strategy)
- Matter 4 (Housing Need);
- Matter 6a (Warrington Waterfront);
- Matter 6c (Fiddlers Ferry);
- Matter 7d (Lymm Allocations);
- Matter 8 (Housing Land Supply); and
- Matter 14 (Monitoring and Review).

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<sup>1</sup> Omission Site Ref 22 (SHLAA Ref: 2705, Site Refs: R18/051, R18/101 and R18/P2/024)

- 1.5 It is our view that, for the reasons set out in this statement, that:
1. There is concern over high density delivery in the Town Centre, particularly in a market that may have reached a saturation point, and when competing with regional centres in Liverpool and Manchester. This in turn questions the capacity of sites within the Town Centre and capacity assumptions in the urban area overall.
  2. Evidence on viability suggests that the level of affordable housing required in Policy DEV2 is not likely to be achievable, particularly given the large proportion of the Borough's supply comprising development in the urban area (11,785 dwellings).
- 1.6 If the Inspectors consider that Main Modifications are required, the Council should consider:
- a) Providing realistic density assumptions, and therefore the re-assessing the capacity of its Town Centre sites; and
  - b) Allocating additional sites in sustainable outlying settlements, such as Lymm, to support a more balanced spatial strategy that is able to provide viable sites that can deliver affordable housing and address a worsening affordability crisis.
- 1.7 Cherry Lane Farm has been demonstrated to be deliverable and could make a significant positive contribution towards meeting both affordable housing and overall housing needs early in the Plan Period. It is Richborough's view that if additional sites are required to address these issues, then Cherry Lane Farm should be either allocated or safeguarded for residential development.

## 2 HOUSING DENSITY

### Q1. What is the basis for the minimum densities set out in Policy DEV1? Are they realistic and justified?

- 2.1 As part of the Local Plan evidence base, the SHLAA (2021) proposes a density of 275 dph in appropriate locations in the Town Centre and 130 dph in Inner Warrington, whilst Policy DEV1 (5) proposes *“at least 130 dwellings per hectare (dph) on sites that are within the defined Town Centre of Warrington”*.
- 2.2 Appendix 4 of the SHLAA provides justification for high density development by setting out permissions and pending applications for high density schemes. However, it identifies no new permissions in the past 3 years, since 2019, for schemes in the Town Centre. It only identifies 2 schemes ‘in planning’ from 2019 and 2020, which may highlight the complexity in progressing these types of schemes through the planning system.
- 2.3 There is therefore concern over high density delivery in the Town Centre, particularly in a market that may have reached a saturation point, and when competing with regional centres in Liverpool and Manchester. This in turn questions the capacity of sites within the urban areas and the assessment of urban capacity that has been undertaken by the Council.
- 2.4 If Main Modifications are required to address any shortfall in delivery in relation to the densities applied to the Town Centre (as set out in our response to Matter 3), then additional sites in sustainable outlying settlements, such as Lymm, should be allocated to support a more balanced spatial strategy and a flexible housing land supply that is able to meet the needs of the Borough during the Plan Period, particularly in the first 5 years.

### 3 MEETING HOUSING NEEDS

**Q7. What is the basis for the percentages of affordable housing sought and are they justified? Q8. Does the evidence on viability support the approach to affordable housing in Policy DEV2?**

- 3.1 Richborough supports the provision of affordable housing proposed in DEV2 and particularly stresses the importance of providing a balanced supply of homes across the Borough to boost a higher level of housing delivery on viable sites in outlying settlements.
- 3.2 The Council's evidence suggests that there is an affordability crisis in the Borough which requires the delivery of sites that can viably deliver affordable housing. The Warrington Local Housing Need Assessment (August 2021) identifies a significant affordable housing need, equal to 423 dpa (rising from 377 dpa in the 2019 assessment - an increase of 14.9%). Even if a policy compliant level of affordable housing can be achieved across all sites, this would only equate to 245 dpa, or 4,406 dwellings over the 18-year Plan Period. The affordability ratio of the Borough is 5.89%, but much higher in areas like Lymm (8.04%), demonstrating the need to distribute affordable housing delivery to areas that have acute affordability issues and that can viably deliver a significant quantum of affordable housing.
- 3.3 As set out in our response to Matter 3 and Matter 4, we consider that capacity and level of development envisaged in the urban area is overstated. There is an over-reliance on urban sites (which have a lower affordable housing policy requirement) that have delivery issues, questionable density assumptions and challenges in relation to viability. Many of these sites have constraints surrounding land contamination, land assembly, flooding and infrastructure constraints – which mean that urban sites, particularly in Warrington and lower value areas, have major viability challenges which could result in a severe under-delivery of affordable housing, with affordable housing likely to be wholly unviable on many sites. Evidence on viability therefore suggests that the level of affordable housing required in Policy DEV2 is not likely to be achievable particularly given the large proportion of the Borough's supply comprising development in the urban area (11,785 dwellings).
- 3.4 If Main Modifications to the plan are required to adopt a balanced spatial strategy that identifies viable sites that can deliver a minimum policy compliant level of affordable housing, then additional sites in outlying settlements (where affordability is the most challenging) should be considered to address the worsening affordability crisis.
- 3.5 Cherry Lane Farm has been demonstrated to be deliverable and could make a significant positive contribution towards meeting both affordable housing and overall housing needs

early in the Plan Period. If the Inspectors consider Main Modifications are required to the plan to viably deliver a higher level of affordable housing and allocate additional deliverable sites, Cherry Lane Farm should be either allocated or safeguarded for new homes.