

# Warrington Local Plan EiP

## Matter 9: Other Housing Policies

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

Date: 05 August 2022 | Pegasus Ref: P20-3147 / R0015v1 / PL

Author: RD

---





# 1. Matter 9 – Other Housing Policies

- 1.1. Our position on Policy DEV 1 – Housing Delivery DEV2 – Meeting Housing Needs is set out in our representations (UPSVP 1427). Below we set out comments in response to the specific questions raised.

## 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?

- 1.2. The density of 130 dwellings per hectare (dph) in the Town Centre would appear to be based on the average density of past planning applications in the inner area as set out at Appendix 4 of the 2021 SHLAA (H4a).
- 1.3. We also note that there are live applications for high density schemes in the Town Centre (2019/35548 and 2022/41003 for example).
- 1.4. The issue we have is that there is no evidence of such market demand for high density developments in the Town Centre and that the densities would be achievable over the medium and long-term.

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

- 1.5. We would welcome clarity on how such locations would be defined.

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

- 1.6. No comment.

## Meeting housing needs (Policy DEV2)

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

- 1.7. The Local Housing Needs Assessment Update (August 2021) (H2) suggests a need for 423 affordable homes per annum<sup>1</sup>.
- 1.8. The issue we have is that with a local housing need figure of 816 dwellings per annum (dpa) it cannot be concluded that affordable housing needs would be addressed when the need is over 50% of the local housing need figure (even when taking account of the fact that the standard method for calculating local housing need includes an uplift above the demographic need to address affordability).

---

<sup>1</sup> H2, Table 1

**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?**

1.9. No comments.

**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?**

1.10. No comments.

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

1.11. The 20% affordable housing requirement within Inner Warrington and the Town Centre has not been justified.

1.12. The Local Plan Viability Assessment (August 2021) (**V2**) finds that the majority of typologies in the lower value areas of Warrington (including the Inner Warrington and the Town Centre) are not viable based on full policy requirements<sup>2</sup>.

1.13. The Warrington Local Plan Viability Report Addendum 2022 (**V1**) subsequently suggests that the original assessment should be considered with caution because planning applications have nevertheless been submitted on sites within the Town Centre and shown to be viable at the application stage<sup>3</sup>.

1.14. In our view, it is not a robust position to rely on the fact that planning applications are being submitted on Town Centre sites to justify the 20% affordable housing requirement within Inner Warrington and the Town Centre, when the assessment clearly demonstrates that full policy requirements are not viable. The viability of specific planning applications cannot be relied upon to justify policy requirements in the plan.

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

1.15. No, for the reasons set out above, the evidence on viability does not support the approach to affordable housing in Policy DEV2.

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

1.16. No comments.

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

1.17. Affordable housing needs in the Borough will not be met in full over the plan period, and on this basis, it cannot be concluded that this part of the policy is effective or sound.

---

<sup>2</sup> **V2**, para 8.6

<sup>3</sup> **V1**, para 6.39 and para 6.40

1.18. Further consideration needs to be given to allocating viable sites outside Inner Warrington and the Town Centre, such as the land being promoted by Taylor Wimpey at **Stocks Lane, Penketh**.

**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?**

1.19. No comment.

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

1.20. There is insufficient evidence to justify the use of Nationally Described Space Standards, in terms of need, viability and timing and the requirements of Planning Practice Guidance have not been met in this regard (Paragraph: O20 Reference ID: 56-020-20150327)

**13. How will “appropriate outdoor amenity space” be defined?**

1.21. No comment.

**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?**

1.22. There is insufficient evidence to justify the requirement for Accessible and Adaptable dwellings and Wheelchair User dwellings and this part of the policy is inconsistent with national policy since the requirements of Planning Practice Guidance have not been met in this regard (Paragraph: 007 Reference ID: 56-007-20150327).

**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?**

1.23. Part 18 of the policy is unsound, will not be effective and is not justified.

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

1.24. No comment.

**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)?**

1.25. No comment.

## **Main modifications**

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



- 1.26. The use of the use of Nationally Described Space Standards and the requirement for Accessible and Adaptable dwellings and Wheelchair User dwellings should be removed, unless justified.
- 1.27. Part 18 should be removed unless justified.

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

Manchester



Offices throughout the UK & Ireland

# Expertly Done.

DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE



All paper sources from sustainably managed forests

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales.

Registered office:

We are ISO certified 9001, 14001, 45001



Pegasus\_Group



pegasusgroup



Pegasus\_Group

**PEGASUSGROUP.CO.UK**