

Hearing Position Statement by
Tetra Tech Planning
on Behalf of Ashall Property Ltd

MATTER 9: OTHER HOUSING POLICIES

Prepared by Tetra Tech Environment Planning Transport Limited.
Registered in England number: 03050297

Our Reference: B040704/9

Summary of matters addressed in this Statement:

We will provide a summary of our Client's position on the Issues and Questions raised by the Inspectors on Matter 9 and will set out what actions are required, in our opinion, to make the draft Local Plan sound.

Matter 9 Inspectors' Questions being addressed: Questions 1, 3, 5, 6, 7, 8, 9, 10, 11, 13, 15 and 22

1. Introduction

- 1.1 Tetra Tech Planning is representing Ashall Property Limited (our 'Client') in support of their proposed site on Land South of the A56 Chester Road (site reference R18/P2/041 – SHLAA reference 2671). Ashall Properties Limited own the Freehold interest of this 8.18 hectares (20.21 acres) site in Walton.
- 1.2 This Statement supplements the submissions previously made by Ashall Property Limited on the consultations prior to the UPSVLP, the UPSVLP itself (Respondent Reference UPSVLP 0417), and Hearing Position Statements on Matters 3 and 6c, 8, and 12. This statement should therefore be read in conjunction with our Client's other representations.

2. Response to Inspectors' questions

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

- 2.1 It is appropriate to prescribe higher densities within the Town Centre than the rest of the Borough to ensure a higher concentration of development in the Borough's main centre. We do however have major concerns with the minimum threshold that the Council is currently proposing for the Town Centre.
- 2.2 The Council is seeking to minimise the level of Green Belt release by ensuring more efficient use of land in Inner Warrington. This is understandable and commended, but the strategy is flawed as it will fail to deliver the range of dwellings identified as being required for Warrington and fails to take account of site-specific considerations. The minimum density of 130dph is therefore not realistic or justified.
- 2.3 Firstly, the minimum density that the Council propose to prescribe should take account of the policy requirements as set out in the UPSVLP. This includes the need for 65% of market housing to be larger family dwellings as per Table 3 of the UPSVLP, compliance with Nationally Described Space Standards (NDSS) (point 11 of DEV2), appropriate outdoor amenity space requirements (point 14 of DEV2).

- 2.4 The “Optional Standards” in Points 15 and 16 of DEV2 should also be factored into the spacing requirements when setting a minimum density threshold. Otherwise, the Council’s housing policy will by default discriminate against residents with mobility impairments.
- 2.5 Paragraph 3.4.5 of the UPSVLP states that the Council “*is reviewing its residential parking standards, recognising the potential for high density development*” in the Town Centre. Car parking is becoming a real issue for new residential development in the Town Centre as existing car parks are earmarked for redevelopment for housing. Examples of car parks that could be lost in the vicinity of the Town Centre are SHLAA sites 1753 and 2672a.
- 2.6 It is not appropriate to defer consideration of car parking standards when setting minimum density thresholds as the two are intrinsically linked. The current adopted car parking standard for the town centre is 1 per apartment. A reduction in this standard can only be justified if suitable, sufficient, and affordable alternative parking is provided. Discussions with one of the registered providers of affordable housing in the Town Centre has already flagged up that there is a lack of availability of 24 hour access contract parking in the Town Centre.
- 2.7 Warrington does not have the benefit of an integrated public transport system with trams or underground tube and the “*New Town development pattern has favoured the car*” (paragraph 2.1.57, UPSVLP). This trend is not completely reversible without major interventions such as a tram service. Therefore, new development, even in the Town Centre, should be providing parking space per dwelling, with greater provision likely to be required for larger properties.
- 2.8 Warrington Town Centre also has the greatest concentration of heritage assets in the Borough as a whole. The proposal to apply a blanket minimum density threshold of 130dph would place the Council’s planning policies at odds with itself as sites close to heritage assets would have no flexibility to duly consider and mitigate the impact on such heritage assets. Policy DEV1 will therefore conflict with Point 7a of Policy TC1 in such circumstances. Figure 1 on the next page (taken from the Council’s Interactive Map) gives an indication of the concentration of heritage assets in the Town Centre.

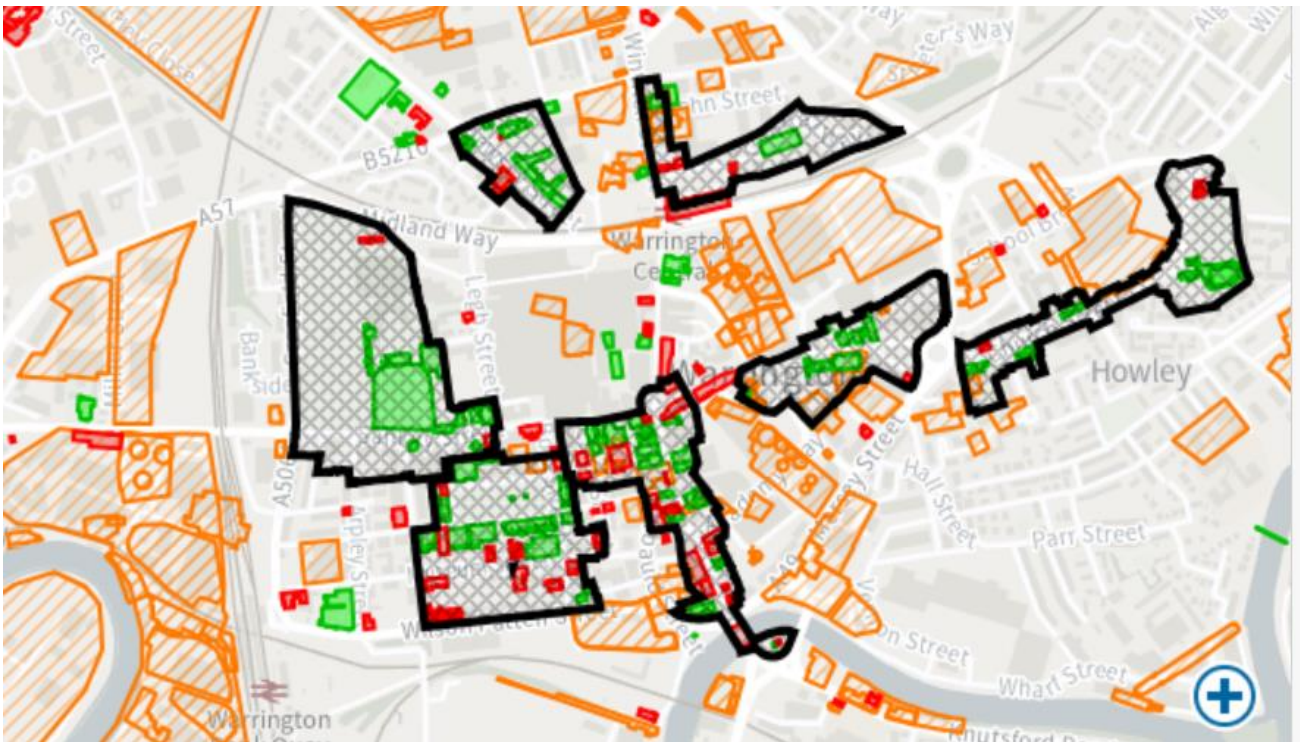


Figure 1. Concentration of heritage assets in and around the Town Centre

2.9 It has not been demonstrated that the issues raised has been factored into the prescribed minimum housing densities for the Town Centre as set out in Policy DEV1.

Q3: Is the policy sufficiently flexible to allow particular circumstances to be taken into account?

2.10 No.

Q5: 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?

2.11 The Council’s Annual Monitoring Report 2021 [CD01] show 100 affordable dwellings completed for 2020/21 but it acknowledges that figure is inflated from the year before. The actual net completions were only 72. The trend for the last 5 years according to the Council’s published AMR’s are:

Year	Number of Affordable Housing Completions
2020/2021	72
2019/2020	159
2018/2019	112
2017/2018	86
2016/2017	72
5 Year Average	100.2

2.12 There has been significant under delivery over recent years against the identified need of 423 affordable dwellings per year. The trend of under delivery is likely to persist for at least the next 5 to 8 years **unless** the Council allocates more sites that are viable and deliverable in the short to medium term. This assessment is based on the inability of Inner Warrington to generate sufficient viability to deliver any meaningful number of affordable homes and the substantial lead in times associated with the big proposed allocations at Fiddlers Ferry, Warrington Waterfront, Peel Hall and the South East Warrington Urban Extension.

Q6: 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?

2.13 **Yes**

Q7: What is the basis for the percentages of affordable housing sought and are they justified?

2.14 This is for the Council to answer as we cannot see on what basis the 20% affordable housing target for Inner Warrington is achievable and therefore justified.

Q8: Does the evidence on viability support the approach to affordable housing in Policy DEV2?

2.15 **No.**

2.16 The Council's own Viability Assessment acknowledges that viability in Inner Warrington is marginal, even with 0% affordable housing provision. Our client's experience is that sites in the Town Centre simply are not viable, unless significant levels of grant funding is provided to subsidise the cost of development.

2.17 A review of the 10 Town Centre sites listed in Appendix 4 [H4a] of the 2021 SHLAA provides further evidence that delivering any meaningful level of affordable housing in the Town Centre is not viable. Out of the 2769 dwellings in that list there was a total of 18 affordable housing apartments. That is only 0,65% affordable housing across those 10 sites.

2.18 In light of all the evidence clearly showing that the Town Centre cannot afford to provide the 20% affordable housing requirement stipulated in Policy DEV2, we strongly recommend that the requirement for the town centre be reduced to a maximum of 10%.

2.19 Greenfield sites in Inner Warrington may be able to deliver slightly higher levels of affordable housing. As such it may be appropriate to apply the proposed 20% minimum threshold to greenfield sites in Inner Warrington.

Q9: Is there sufficient flexibility to take account of site-specific viability issues?

2.20 Point 8 of DEV 1 does provide flexibility to reduce the level of affordable housing and change the mix. This is welcomed.

2.21 Having said that, the aim of the Local Plan process should be to test viability at plan making stage and then set housing policies that are deliverable. Otherwise, the Local Plan will not be sound.

2.22 The Policy should seek to reduce the need for site specific viability assessments on nearly every application.

Q10: In other respects, is the approach to affordable housing justified, effective and consistent with national policy?

2.23 The Council's own evidence base identifies a significant need for 423 affordable dwellings per year as per the Local Housing Needs Assessment [page 11, H2]. We note that Paragraph 2.1.38 of the UPSVLP refers to 433. It is evident that the brownfield sites in the existing urban area are not capable of securing sufficient levels of affordable housing to help address the housing affordability crisis in Warrington due to lack of viability.

2.24 The LHNA [H2] provides a comparison of affordable housing need between the 2019 LHNA study and the 2021 study in Table 1 on page 11. This shows that the annual affordable housing needs has increased substantially by 56 dwellings per annum (dpa).

2.25 Yet, despite this worsening position the Council took the decision to reduce the annual housing target from 945dpa to 816 from the previous Proposed Submission Version and to reduce the level of greenfield release (which includes Green Belt sites). That will result on a double hit on the affordable housing position, as not only is the current position shown to be worsening, but the Council also chose to suppress the two most vital components within their control for increasing affordable housing delivery over the Plan Period

2.26 Notwithstanding this substantial annual need and history of under delivery of affordable housing, the Council appears to be unwilling to increase its annual housing target above the minimum requirement established by the Standard Method. This approach is not justified or effective.

Q11: 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?

2.27 Yes.

2.28 We agree that the housing mix should be **informed** by the sources of need assessment as identified in Policy Dev2 Point 11 rather than setting out a rigid mix that has to be conformed to in every application.

2.29 We further agree that the housing mix should be informed by the most up to date data and should be able to be agreed on a site by site basis as set out in the supporting text to Policy DEV2 in Paragraph 4.1.55 of the UPSVLP. It is **vitaly important** that market demand is also allowed to be factored into the resultant mix as this would not only affect the viability of schemes but also the delivery pace.

Q13: How will “appropriate outdoor amenity space” be defined?

2.30 We await the Council’s clarification on this point. This is likely to have implications for the net density that can be achieved on sites.

Q15: 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?

2.31 Given the national trend of an ageing population the Council is justified in its approach to ensure housing for older people. We have no objection in principle with Points 18 or 19 of DEV2 but require further clarification.

2.32 For developments of over 10 dwellings what % of dwellings should be suitable for older people?

2.33 Would the provision of accessible and adaptable or wheelchair user dwellings satisfy the requirement as being ‘suitable for older people’?

2.34 In establishing its proposed minimum densities for new development, has the Council factored in the space requirements associated with accessible and adaptable or wheelchair user dwellings?

2.35 Has the Council taken sufficient account of the cost implications of providing the “optional standards” listed in Points 15 and 16 of DEV2. Point 17 of DEV2 implies that

a viability assessment would be required if these optional standards are not viable. This would suggest that these standards are not optional at all but mandatory subject to viability.

Q22: Are any main modifications to the above policies necessary for soundness?

2.36 Yes. See Section 3 below.

3. Actions required to make the UPSVLP sound

- 3.1 The minimum housing density to the Town Centre should be reduced. We consider a minimum density of circa 70 to 80 dwellings per hectare (dph) to be more appropriate. This would not preclude higher densities which can still be pursued in appropriate locations as part of the Council's regeneration initiatives for the Town Centre.
- 3.2 There may well be instances where even 70dph may not be appropriate, for example development involving conversion of existing heritage assets, or sites in close proximity to heritage assets, or provision of larger family dwellings with 'appropriate outdoor amenity space'. Therefore the policy should include a level of flexibility similar to that currently provided developments under 30dph.
- 3.3 The Council should do away with the stepped housing target, provide an uplift to the Annual Housing Target, and allocate additional sites for housing that are deliverable in the short to medium term (year 1 to 8) to address the historic under delivery on affordable housing. We consider the 945 previously proposed and consulted on in the PSVLP 2019 to be more appropriate.
- 3.4 The Council should look favourably on Green Belt sites that are being promoted with dedicated accommodation for older people in accessible locations and allocate them for residential development if they are deliverable and are not of high significance in Green Belt terms.
- 3.5 Our Client's site (Land South of Chester Road – SHLAA reference 2671) borders the Main Urban Area of Warrington, is less than 250 metres from Inner Warrington and less than a kilometre from Stockton Health local centre. It is in single ownership with good road access and is therefore deliverable within years 1-5 of the Plan Period. It has a site capacity to provide a care home with (80 to 110) beds, 70 extra care or retirement apartments and 137 dwellings (of which 50% will be affordable housing).
- 3.6 Our recommended revisions to the policy wording in the UPSVLP are shown as tracked changes in Appendix 1.

Appendix 1: Updated suggested tracked changes to UPSVLP policies

Policy DEV1 – Housing Delivery

Housing Requirement

1. Over the 18 year plan period from 2021 to 2038, a minimum of ~~14,688~~14,868 new homes will be delivered to meet Warrington's housing needs. This equates to an average of ~~816~~826 homes per annum.

Housing Distribution

2. The majority of new homes will be delivered within the existing main urban area of Warrington, the existing inset settlements and other sites identified in the Council's Strategic Housing Land Availability Assessment (SHLAA), which together have identified deliverable capacity for a minimum of ~~11,785~~9,784 new homes.

3. The following sites will be removed from the Green Belt and allocated for residential development:

a. South East Warrington Urban Extension – minimum of 4,200 homes of which a minimum of ~~2,400~~2,160 homes will be delivered in the Plan Period.

b. Land at Fiddlers Ferry – minimum of ~~1,760~~900 homes of which ~~1,310~~450 will be delivered in the plan period as part of a wider mixed use development.

c. Thelwall Heys – minimum of 310 homes will be delivered in the plan period.

d. Land South of Chester Road – minimum of 207 homes and a care home will be delivered in the plan period.

4. A minimum of 801 homes will be delivered on allocated sites to be removed from the Green Belt adjacent to following outlying settlements:

a. Croft – minimum of 75 homes

b. Culcheth – minimum of 200 homes

c. Hollins Green – minimum of 90 homes

d. Lymm – minimum of 306 homes

e. Winwick – minimum of 130 homes

Housing Density

5. New residential development should optimise the amount of housing developed on a site.

New development should therefore aim to achieve the following minimum densities:

a) at least ~~70~~¹³⁰ dwellings per hectare (dph) on sites that are within the defined Town Centre of Warrington subject to complying with the requirements of the Warrington Town Centre SPD;

b) at least 50dph on sites that are within the wider Town Centre Masterplan area and sites adjacent to a district centre or in other locations that are well served by frequent bus or train services; and

c) at least 30dph on all other sites, except where greater densities has been prescribed by the Local Plan, that are within an existing urban area.

6. Densities ~~of less than 30dph~~ below the thresholds set out above 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.

Stepped Housing Requirement

~~7. As part of the housing trajectory (Appendix 1) the housing requirement is to be stepped in the following way:~~

~~a. 2021 to 2025 (first 5 years) – 678 homes per annum.~~

~~b. 2026 to 2038 (years 6 – 18) – 870 homes per annum.~~

Policy GB1 - Green Belt

Land removed from the Green Belt

3. The following land has been removed from the Green Belt and the amended Green Belt boundaries are shown in Figure 6:

a. South East Warrington Urban Extension

b. South East Warrington Employment Area

~~c. Land to the east and south of Fiddlers Ferry Power Station~~ c. Land South of Chester Road

d. Thelwall Heys

~~e. Land at Warrington Waterfront~~

f. Land at Croft

Policy DEV2 – Meeting Housing Needs

Affordable Housing

1. In residential development of 10 dwellings or more, or with a gross floor area greater than 1,000sq m, affordable housing will be required to be provided on the following basis:

a. ~~1020~~% on brownfield sites within Inner Warrington, inclusive of the Town Centre.

b. ~~20~~% on greenfield sites within Inner Warrington, inclusive of the Town Centre.

b. 30% elsewhere in the Borough and on all greenfield sites outside Inner Warrington, irrespective of their
location.

2. Where ~~1020~~% affordable housing provision is made within Inner Warrington and the Town Centre, half of the units should be for affordable housing for rent and half should be for affordable home ownership.