

STATEMENT

Warrington Local Plan Examination: Ref 1434

22 September 2022

Matter 8: Updated Housing Trajectory including 2022 monitoring data

The Duty to Co-operate

Response on behalf of

Satnam Millennium Ltd

Brooklyn Ltd

1. Further to the email of 10/10 seeking further views on the updated document as listed above. On behalf of our clients, we submit our considerations, as discussed verbally at the Hearing on 29/09/2022.
2. The Updated Housing Trajectory sets out the proposed dwelling completions for each of the 5-year periods of the plan, years 1-5, 6-10 and so on. We consider the timing for the Fiddlers Ferry Power Station (MD3) and SEWUE (MD2) to be unrealistic.
3. To set the scene, Peel Hall (MD4) benefits from OLPP and this site is forecast to yield its first dwellings in 2025/26. This is a revised date, the Council previously considering that prior to the site benefiting from OLPP no dwellings would be delivered within the first 5-year period.
4. Also, the "top up site", Thelwall Heys (MD5), brought into the plan to produce dwellings in the early years of the plan period, being a relatively simple and straight forward site to develop, is only expected to deliver dwellings one year earlier in 2024/25.
5. In contrast to these timings, which we regard as sensible and realistic, the Fiddlers Ferry and SEWUE sites are both forecast to deliver dwellings in the same year as Peel Hall, only one year after Thelwall Heys. But these are complex green belt sites, with lengthy processes required to be undertaken following the adoption of the plan prior to housing delivery taking place.
6. Peel Hall was not a green belt release site, it is within the urban area. It does not require major new infrastructure, merely upgrading of existing roads and junctions. It adjoins on 3 sides

the existing built-up area of north Warrington, so local services and facilities, such as shopping, schools, recreation, and employment, are instantly within reach of the early residents. Yes, the OLPP requires site wide master plans and other schemes such as drainage, noise, and so on prior to the submission of reserved matters, but these can be processed, and delivery is sensibly predicted to commence in 2025/26. All the relevant highway studies and modelling has been done, mitigation agreed, and designs known. The Parameters Plan is fixed and the master plans must follow that plan. The range of S106 requirements is agreed and set out. The relevant nature conservation studies and ecology surveys are completed. We understand there are elections in Warrington in Spring 2024, and the Council have historically not wanted to put major developments that are controversial to committee within 6 months of the date of an election. Again, we, and we understand the Council, have allowed for that in our considerations.

7. Contrast this to the situation at the Fiddlers Ferry and SEWUE sites. They remain within the green belt and will remain so until the plan is adopted (currently estimated to be mid 2023). Once released, a Development Framework has to be prepared and discussed with the relevant Authorities and stakeholders (including the neighbouring Authority in the case of Fiddlers Ferry) and bodies such as Natural England, Highways England and other national bodies. There then must be adequate and meaningful public consultation on the draft Development Frameworks, following which the comments should be assessed and revisions made. The Frameworks then have to be approved by the relevant Authorities stakeholders. This is a major exercise, akin to the preparation of an SPD, bearing in mind the requirement for the engagement to be meaningful, not merely lip service. The SEWUE is an unpopular proposal locally, and many interested groups will wish to interrogate the draft DF and its evidence base: similarly the residents of Widnes will wish to ensure the proposals for Fiddlers Ferry are appropriate for their area (as no joint LP has ever been considered for this strategic proposal, even though it should have been so considered, as explained at the Hearing, and accepted by the Council, under the DTC issue).
8. Only once the DFs are approved can planning applications be submitted. These will be complex and large EIA applications and these can only be submitted once the relevant information from surveys / studies and modelling is finalised. Again, proper scrutiny and public consultation on these applications will be required. Consideration by the Council may well be affected by the March 24 election period. Complex and involved S106 agreements will be required. These OLPP / hybrid applications once approved will require pre-commencement conditions and reserved matters, all of which take yet more time and consideration. Construction will be affected by nature conservation matters and seasonality, together with the ability to undertake works to public and private utility works and infrastructure.
9. Based on the complex tasks involved in these 2 sites, the proposed timeline for dwelling delivery set out for these sites on the Updated Trajectory is overly optimistic to the point of being unrealistic. If the Council consider Peel Hall to take 4 years to deliver following the grant of OLPP, the same should hold good for these other sites of a similar scale: no convincing evidence has been put forward to demonstrate these sites can be brought forward, with certainty, faster.

10. The Additional information submitted for Fiddlers Ferry (CD31) sets out a theoretical route to delivery at the required date, but it is simply that, theoretical. It reflects none of the realities set out above which we have experienced as the only major site promotor in Warrington in recent years to achieve a consent on a non-green belt site. It reflects none of the complexities that sites of this scale encounter as they are promoted.
11. The timeline also assumes work on the Development Frameworks in isolation, without all the other caseload the LPA must deal with in tandem. The resources required to properly participate in and consider the Development Frameworks and subsequent planning applications and reserved matters applications will be a real strain for the Authority. The trajectory pays no attention to this huge workload issue.
12. A more sensible proposal is to put delivery of the 2 sites into the second 5-year period, adopting a similar approach to Peel Hall prior to it receiving OLPP, so as to reflect a realistic timeline to delivery and thus provide the robustness the trajectory requires to be reliable.
13. At the heart of this issue, it must not be forgotten, is the delivery of homes in Warrington. In the light of the accepted serious and harmful shortage of market and affordable homes in the Borough, an unrealistic trajectory will exacerbate these already serious problems of delivery.