



THE HOME BUILDERS FEDERATION

The Planning Policy and Programmes Team,
Economic Regeneration,
Growth and Environment Directorate,
New Town House,
Buttermarket Street,
Warrington,
WA1 2NH

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Email: ldf@warrington.gov.uk

Sent by Email only

Dear Sir / Madam,

Warrington Strategic Housing Land Availability Assessment Draft Site Appraisal: Technical Evidence Base Consultation

1. Thank you for consulting with the Home Builders Federation (HBF) on the draft SHLAA.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. We would like to submit the following comments upon the methodology which will hopefully assist the Council in putting together a robust evidence base. Our comments are set out against the key assumptions the SHLAA document. The HBF does not wish to comment upon the acceptability of individual sites at this stage.

Green Belt Sites

4. It is noted that the SHLAA does not consider the potential residential yield from Green Belt sites, with such sites being discounted as not being within the scope of the assessment. Whilst the HBF accepts that a general policy presumption against the release of Green Belt sites exists, the 'unsuitability' of such sites is enforced solely by the application of a policy designation – a constraint which is capable of being removed, if justified. Green Belt sites

are not inherently constrained in physical or accessibility terms and there is no reason to consider that they are undevelopable, subject to the lifting of policy restrictions that apply.

5. The purpose of the SHLAA is to identify a potential supply of land to meet future housing requirements. However, as an assessment exercise, it is not required to be undertaken in the context of a fixed housing requirement. This is confirmed by Paragraph 03-009 of the Planning Practice Guidance (PPG). It is principally a capacity assessment. As such, sites should be identified for assessment in a 'policy off' context in the first instance. A site's current policy designation then becomes one of the constraints to factor into an assessment of suitability, availability and achievability.
6. Whilst accepting that Green Belt sites may not, based on existing policy designations, pass the suitability test, this does not mean that such sites are not available and achievable. Moreover, in the context of a shift in local policy to the extent that Green Belt land were needed for residential development, some Green Belt sites could also pass the suitability test. This is particularly important in Warrington given that the Council does not currently have an adopted housing requirement in its Local Plan. The need, or otherwise, for Green Belt release is therefore unknown. Green Belt land may therefore need to be called on to meet the future housing requirement the Borough, reinforcing the importance of having a full understanding of which Green Belt sites may be able to contribute to the supply.
7. This approach is supported by Paragraph 03-011 of the PPG which confirms that;

'Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness but these constraints must be set out clearly, including where they severely restrict development.'

In light of this, the HBF considers that submitted Green Belt sites should be subject a full suitability, availability and achievability assessment alongside all other potential housing sites in updating the draft SHLAA.

Standard Assumptions

8. The use of standard assumptions for developable area ratio, build rates, lead-in times and density are in principle acceptable. The HBF does, however, advocate discussion with the relevant site developer so that the implications of infrastructure provision, site constraints and construction start-up can be properly assessed and built into the trajectory for site completion. It is, however, recognised that this will not be possible in all circumstances.
9. Where standardised assumptions are utilised it is important that these are supported by robust up to date evidence (PPG paragraph 3-031). This could include analysis of the patterns and timescales of sites recently approved or evidence gathered via discussions with developers at section 78 appeals.

The evidence used in the derivation of the Council's assumptions should be made publicly available to enable independent analysis of the Council's proposed assumptions. The SHLAA should also set out how the assumptions have been applied, particularly where a range is used. The provision of this data will provide clarity, consistency and transparency to the key assumptions.

Developable area ratio

10. The HBF agrees the net developable area will vary with larger sites tending to have a lower ratio, due to the need to take account for infrastructure and other facility requirements. The 75% ratio for sites above 2ha is likely to be too high in many cases, particularly on larger sites due to the inevitable increase in infrastructure requirements. Therefore on sites above 2ha, where existing information from a site promoter / developer is not available, it is recommended a more refined assessment be undertaken which takes account of the site characteristics. This should include the likelihood of constraints such as flood risk, the need for infrastructure and site topography.

Build rates

11. The draft SHLAA identifies a range of build rates which are dependent upon site size. Whilst the principles of such an approach are generally considered appropriate the rates used appear high. It is noted that the draft SHLAA has increased the rates by 5dpa across each category from the previous 2012 SHLAA, table 1. The HBF is unclear upon the rationale for this change. It is therefore recommended that the reason for the change in assumptions are clearly identified and supported by robust evidence. This could include the analysis of previous build rates, across the identified thresholds.

Lead-in times

12. The proposed lead-in times are considered too simplistic and do not take account of the differentiation between site size and lead-in times. This is generally due to the increased complexity of sites as they increase in size. Issues such as the need and complexity of Section 106 agreements, infrastructure provision and site preparation generally increase with site size and will impact commensurately with lead-in times. The SHLAA should therefore consider variations to lead-in times based upon site size.
13. The Council will play a considerable role in lead-in times, particularly with regards to the length of time taken to determine planning permission, sign section 106 agreements and discharge pre-commencement conditions. It is recommended that the Council analyse its own data upon these areas to identify the time taken and identify areas for improvement.
14. In terms of the current lead-in times proposed the HBF make the following observations;

- **Under construction** – the HBF agree that no lead-in time should be applied to such sites, providing the construction of dwellings has commenced.
- **Full permission / reserved matters** – The identified assumption for a 1.5 year lead-in time appears reasonable on smaller sites, although on larger sites this should be extended to at least 2 years.
- **Outline permission** – A two year lead-in is considered too short, particularly for larger sites and a lead-in time of 2.5 to 3 years may be more appropriate given the substantial work required, including applying for reserved matters, signing section 106 agreements, approval of pre-commencement conditions and site preparatory works.
- **Sites without permission** – the inclusion of this category requires further substantiation. A lead-in time should only be provided where there is clear developer interest and an application is anticipated imminently. It is notable this category are anticipated to come forward within 2.5 years. This is considered unlikely on larger sites due to the time taken to apply, grant permission, deal with any section 106 agreements, discharge pre-commencement conditions and start on site. Due to the uncertainties involved in such sites the HBF strongly recommend that the Council base any generalised starts in this category, which can be substantiated by developer interest, with a 3 to 4 year lead-in.

Density

15. The draft SHLAA identifies that in most instances a simple density per hectare calculation should be applied with the lower and upper limits generally 30 and 50 dwellings per hectare (dph). This is consistent with the previous SHLAA. To provide clarity to the outputs it is important that the SHLAA provides guidance upon how it has applied its density assumptions for sites within this range where no other information is available.
16. The lower 30dph is a reasonable assumption for the density of many sites providing it is based upon the net developable area and not the gross site area. This figure approximates to average net densities nationally, albeit with significant variations between land use types and localities. The upper limit of 50dph is unlikely to be appropriate in all but a few high density town centre locations, dependent upon the individual site and its wider setting. It is therefore recommended that densities at the higher end of the range are only utilised where clear evidence exists. Conversely it is also likely that in rural settings development densities lower than 30dph may be appropriate, the Council may therefore wish to consider lowering the range to take account of such sites.
17. The HBF therefore agrees with the draft SHLAA in that the density range should be applied flexibly and where possible should be based upon local characteristics and market potential. In this regard it is important that wherever possible discussions with site promoters and developers are held to assess the likely development potential of individual sites.

18. I trust that the foregoing is useful and look forward to further progress on the SHLAA in the near future. I would be happy to discuss any of the issues raised further with the Council.

Yours sincerely,

MJ Good

Matthew Good
Planning Manager – Local Plans
Email: matthew.good@hbf.co.uk
Tel: 07972774229