

Local Plan
Planning Policy and Programmes
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA1 2NH

SENT BY EMAIL
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17/06/19

Dear Sir / Madam,

WARRINGTON LOCAL PLAN: PROPOSED SUBMISSION VERSION

Thank you for consulting with the Home Builders Federation on the Proposed Submission Draft version of the Local Plan for Warrington.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We would like to submit the following comments upon selected policies within the consultation document. These responses are provided in order to assist Warrington Borough Council in the preparation of the emerging local plan. The HBF is keen to ensure that the Council produces a sound local plan which provides for the housing needs of the area.

Policy DEV1 – Housing Delivery

Policy DEV1 is not considered to be sound as it is not positively prepared and justified for the following reasons:

Housing Requirement

This policy states that over the period 2017 to 2037 a minimum of 18,900 new homes will be delivered to meet Warrington's housing needs and support its economic growth aspirations. This equates to an average of 945 homes per annum.

The HBF consider it is important that the proposed housing requirement is viewed as a minimum and barriers are not put in place which may hinder greater levels of

sustainable growth. It is considered that the plan could facilitate higher levels of growth by providing greater flexibility.

The Options and Site Assessment Technical Report and the Local Housing Needs Assessment identify the minimum housing requirement from the MHCLG Standard Methodology as 909 homes per annum. The HBF support the Council's decision to utilise a housing figure over and above that set out in the MHCLG Standard Methodology, which is considered appropriate to support growth in Warrington. The HBF support the Council in looking to ensure that there are sufficient homes to meet the Council's economic growth aspirations and to address affordability problems experienced by Warrington's younger residents who are struggling to get on the housing ladder. The HBF considers that Warrington is ideally located to achieve high levels of growth, providing it is based upon an appropriate development strategy.

Housing Distribution

Part 2 of the policy considers the distribution of housing, it suggests that the majority of new homes will be delivered within the existing main urban area of Warrington, existing in set settlements and other sites identified in the SHLAA. The HBF consider that further flexibility could be provided by the wording of this policy, as at present it reads as a statement rather than a policy.

The HBF consider that it is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas.

Housing Trajectory

Part 5 of the policy introduces a stepped approach to the housing requirement proposing a housing figure of 847 homes per annum for the first five years (2017 to 2021) and a higher figure of 978 homes per annum for the remainder of the Plan period (2022 to 2037). The HBF do not consider that this stepped approach is appropriate it appears this stepped housing requirement is intended to reduce the backlog in housing supply at the start of the plan and is being used by the Council as a way of achieving a five-year land supply position on adoption. It is important to remember that this is not just a theoretical mathematical numbers exercise but represents actual households in housing need today, so it is unreasonable and unequitable to expect them to wait until later in the plan period before their current housing needs are addressed. The HBF do not consider the stepped trajectory to be justified and would recommend that further sites should be allocated for delivery in the first five years of the plan.

As set out in our previous response the HBF has some concerns over the deliverability of some of the supply of sites from the urban area particularly where these sites are occupied by alternative uses and / or contingent on ambitious infrastructure investment. Therefore, the HBF would continue to recommend that further clarity should be provided in this regard, ideally this additional information should be supplemented by evidence from the site promoter / developer wherever possible.

Table 1: Land Requirements over the Plan Period

The HBF support the Council in including a flexibility allowance on top of the overall land supply to allow for market choice and in the event that specific sites do not come forward, however, the HBF would normally recommend a 20% buffer. The inclusion of a buffer to provide flexibility is supported and considered consistent with the NPPF requirements for plans to be flexible and able to adapt to changing circumstances. It should also be noted that the housing requirement is, correctly, expressed as a minimum and as such the Council should be seeking to surpass this requirement over the plan period. This is also consistent with the NPPF requirements for plans to be positively prepared and boost significantly housing supply.

Supply beyond the Plan Period

The HBF are concerned that the Council no longer appear to be including any safeguarded land within their Plan. Whilst there is no definitive guidance indicating the amount of land which should be safeguarded the NPPF is clear that where necessary Local Plans should provide safeguarded land to meet longer term development needs stretching “...*well beyond the plan period...*” and that local authorities should satisfy themselves that Green Belt boundaries “...*will not need to be altered at the end of the development plan period...*”. Given that the proposed plan will have a 20 year time horizon it is considered that safeguarded land requirement should seek to match this. This will not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period.

The HBF also consider that the Plan should provide triggers which would indicate when the safeguarded land would be considered for release, through a plan review. The Council will be aware of the housing delivery test (HDT) and how this will require action to be taken if delivery falls below 95% of the Council’s annual housing requirement¹. The release of safeguarded land could be linked to a trigger if the plan is failing to deliver as anticipated.

Policy DEV2 – Meeting Housing Needs

Policy DEV2 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

Affordable Housing

This policy states that residential development of 10 or more dwellings will be required to provide 20% affordable homes on sites within inner Warrington and 30% affordable homes on greenfield sites and elsewhere.

The HBF does not dispute the need for affordable housing within Warrington and indeed supports the need to address the affordable housing requirements of the borough. The Local Housing Need 2019 report identifies a need for 377 affordable homes per annum in Warrington. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability.

¹ It is noted that the HDT 2018 has Warrington at 55%.

The Local Plan Viability Assessment (March 2019) highlights issues with affordability for some of the typologies and site allocations. Section 5.1 (pg. 32) states that *‘as there are typologies and areas which are shown to be unviable at these levels of affordable housing, the Council will need to operate their policy flexibly, having regard to individual site viability’*. Therefore, the HBF have concerns that this policy will lead to the non-delivery of homes in the Borough. It should be noted that Paragraph 34 of the NPPF (2019) establishes the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.

Housing Type and Tenure

This policy states that residential development should provide a mix of different housing sizes and types and should be informed by the monitoring target set out in the Plan. The HBF understands the need for a mix of dwelling types and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence.

The HBF have concerns that Table 3 provides a snapshot in time and may be superseded by more up to date and other sources of information. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

Optional Standards

This policy requires that residential developments of 10 or more dwellings provide 20% of homes at the M4(2) standard. The HBF is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible & adaptable homes the Council should only do so by applying the criteria set out in the PPG. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. The Local Housing Needs Assessment provides the Council’s evidence for this policy. Unfortunately, this evidence is severely lacking on the majority of these elements. This lack of evidence does question how the percentages identified in the policy were derived. It is incumbent on the Council to provide a local assessment evidencing the specific case for Warrington which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy.

If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that the policy should:

- take into account site specific factors such as vulnerability to flooding, site topography and other circumstances which may make the site less suitable for M4(2) and M4(3) compliant dwellings as set out in PPG;

- ensure that if step-free access is not viable that M4(2) and M4(3) should not be applied; and
- ensure an appropriate transitional period is included.

Part 10 of the policy also states that where there is an identified need the Council will also seek a proportion of wheelchair user dwellings in order to meet the overall requirement for 5% of new homes to be wheelchair accessible in accordance with standard M4(3) 'wheelchair user dwellings'. It is not clear how this part of the policy will work, for example how will an 'identified need' be proven or not, and what proportion of the development will need to meet the M4(3) standard to contribute to the 5% overall requirement.

Housing for Older People

This policy looks for residential developments of 10 or more dwellings to make provision for 20% of the homes to accommodate the needs of older people. Whilst the flexibility of the policy is appreciated in terms of the consideration of the location of site, the nature of the area and the type of development. It is not clear what will be required from the development.

Site Allocations

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and provide a range of development opportunities. The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

When selecting housing sites for allocation the Council should select the widest possible range of sites by both size and market locations to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. The Council should also provide maximum flexibility within its overall housing land supply to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market.

Monitoring and Review

Policy M1 – Local Plan Monitoring and Review

Policy M1 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

This policy states that if delivery of housing including affordable housing, in any given monitoring year falls below 100% of the annual requirement, the Council will consider implementing all or some measures to bring forward development. Measures include working with developers to remove obstacles to the delivery of sites. Part 3 of the policy states that where total delivery of housing is less than 75% of the annual

requirement for three consecutive years this will trigger the need for consideration of a review of the Plan.

The HBF support the Council in including a policy highlighting the actions to be taken if housing is not delivered. However, it is considered that the Council may also want to consider alternate measures such as the granting of planning permission for unallocated sites in sustainable locations. The Council may also want to consider how this policy sits with the Housing Delivery Test and the presumption in favour of sustainable development as set out in the NPPF 2019.

Appendix 2 sets out the Monitoring Framework, the HBF supports the use of appropriate targets however, we would also recommend that specific monitoring triggers are introduced to this framework, along with time-bound actions. In the case of the housing targets this is likely to be similar to Policy M1. This will help to ensure that action will be taken when a target is not met, and a policy needs reviewing.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of the progress of the Local Plan and associated documents, including the submission of the Local Plan, the publication of the Inspectors Report, consultation on any Main Modifications and the adoption of the Plan. The HBF also wish to participate in the Examination in Public. Please use the contact details provided below for future correspondence.

Yours sincerely,



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