

Warrington Local Plan Issues Report

Consortium of Developers and Housebuilders

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1.0 Introduction

1.1 This report has been prepared by Lichfields on behalf of a Consortium of leading developers and housebuilders operating in the North West housing market including Ashall Land, Barratt Developments (Barratt Homes and David Wilson Homes), Metacre Ltd, Satnam Developments, Story Homes, and Wainhomes [the Consortium]. It is prepared to set out the Consortium's key issues with the emerging Warrington Local Plan and substantiate these concerns to the Planning Inspector examining the Local Plan.

1.2 The planning system should be genuinely plan led, provide a vision for the future of the area, and address the housing needs and other economic, social and environmental priorities¹. In this context the Warrington Updated Proposed Submission Version Local Plan [UPSVLP] is consulting on comments pertaining to 'soundness' issues. These expectations are set out in the Framework [§35].

The Consortium

1.3 The members of the Consortium are all very active in the housing market across the North West of England, facilitating and delivering much needed homes for families and local communities including affordable homes. As such, the members of the Consortium have 'hand-on' experience of the Warrington housing market and understand the key issues associated with delivery of sites and the supply of suitable and available sites. The Consortium members fully understandings the process involved in plan making and the potential pitfalls that plan makers often fall foul of.

1.4 It is important to point out at the outset that the members of the Consortium are all experiencing significant issues in the delivery of sites in the North West, particularly due to the lack of suitable sites coming to the market and the general availability of developable land. This has profound impacts on their ability to deliver homes including affordable and family homes. The members of the Consortium view the plan making process as being vital to the delivery of sustainable developments and the release of sufficient amounts of land to deliver the homes needed to boost supply. Allocating sufficient quantum of land now will assist in resolving one of the key issues being experienced in the North West housing market (i.e. the lack of suitable housing sites) particularly in authorities constrained by Green Belt.

1.5 This report has been prepared to objectively inform Warrington Council of the key issues with its UPSVLP from the perspective of the Consortium members. We have also offered solutions to these issues to help Warrington Council in the preparation of a Local Plan and to assist the Inspector reviewing the soundness of the Plan at Examination.

Context

1.6 It is important to state at the outset that the Consortium welcomes the efforts made by Warrington Council in producing the Publication Draft Local Plan and the associated evidence base. We consider that it is imperative that Warrington progresses and adopts a sound and aspirational plan which accords with national policy as quickly as possible. The Plan needs to be aspirational and ensure appropriate levels of housing and economic growth are being pursued. The Warrington Local Plan is being prepared in unprecedented and challenging times. However, the Plan needs to embrace this and act as a catalyst for growth by adopting policies which are ambitious, transformational and visionary in approach.

¹ Framework [§15]

- 1.7 The National Planning Policy Framework [The Framework] sets out that the planning system should be '*genuinely plan led*', whilst an '*up-to-date plan should provide a positive vision for the future of each area*' [§15]. Furthermore, plans should be prepared with the objective of achieving sustainable development and be positively prepared in a way that is aspirational but deliverable [§16].
- 1.8 When preparing and reviewing plans, national policy dictates that all policies should be underpinned by relevant and up-to-date evidence. Policies in plans and spatial development strategies should be reviewed '*at least once every five years*'. Reviews should be completed no later than five years from the adoption of the plan and should take into account changing circumstances affecting the areas, or any relevant changes in national policy (§32).
- 1.9 With the requirements of national policy in mind, Warrington last adopted a Local Plan (Core Strategy) in July 2014 and as such is in need review. Coupled with that, although Warrington adopted the Core Strategy, in 2015, following a High Court decision², elements of the Plan were overturned and the housing target for the authority was quashed. Therefore, Warrington has not had a formally adopted housing requirement since the adopted of the North West Regional Strategy in 2008.
- 1.10 The Consortium is very keen to see the Warrington Local Plan progress and was disappointed with the significant delay between the previous iteration released for consultation in 2019 and this iteration of the Plan. For too long, elements of the Warrington Core Strategy are out of date and there has been no adopted housing requirement for the area. It is considered that positive plan preparation offers Warrington a golden opportunity to capitalise of its unique set of circumstances and maximise its potential by delivering aspirations levels of housing to meet market and affordable housing to meet current and future needs. It can also facilitate the pro-development rhetoric being expressed in other documents and strategies, notably the Government's 'levelling up' agenda, the Northern Powerhouse Strategy, the Long Term Economic Plan for the North West; and, the City Growth Commission.
- 1.11 Continued delays in plan making, lack of deliverable sites and policy vacuums will continue to exacerbate the housing crisis being experienced in Warrington, cause worsening affordability issues and effectively lock a generation out of home ownership.
- 1.12 In the opinion of the Consortium, this version of the UPSVLP disappointingly pursued the minimum housing requirement allowed rather than act as a catalyst for economic growth for the Northern Powerhouse and doing its bit to 'level-up' the northern economy. It rows back significantly on the aspirational nature of the previous iteration of the Plan due to political interference rather than a sound planning basis. Furthermore, the housing supply is focused solely on the total housing requirement regardless of the type of units being delivered rather than providing homes to meet future needs including affordable homes.
- 1.13 The identification of additional land is vitally important. Tough decisions are required in the short term to facilitate long term growth and provide the housing and affordable housing supply required to meet Warrington's needs.

Objective of the Consortium

- 1.14 The ultimate objective of the Consortium will be identical to Warrington Council's. The group want to see the adoption of a sound and aspirational Development Plan for Warrington which provides suitable land in sustainable locations to ensure that sufficient housing land is available throughout the Plan period and to meet all types future housing needs. Plan preparation in Warrington has been delayed for a number of years and has resulted in the Council failing the

² Satnam Millennium Limited v Warrington Borough Council [2015] EWHC 370 (Admin)

Housing Delivery Test and being unable to demonstrate a 5-year supply of housing land. The lack of progress in adopting a Local Plan has significantly impacted upon the availability of land across the borough.

- 1.15 Warrington’s urban areas are highly constrained by tightly drawn Green Belt boundaries and the adoption of an aspirational Local Plan which identifies and allocates sufficient proportions of land to meet future needs is the best and most sustainable way of releasing sufficient land to meet the identified needs. The UPSVLP acknowledges that *‘the previous focus on using brownfield land to meet the housing and employment needs has now meant that Warrington is running out of such land and supply is dwindling’* [§2.1.12]
- 1.16 The Vision within the UPSVLP acknowledges that *‘Warrington’s central position within the Northern Powerhouse provides businesses with unrivalled access to the Manchester and Liverpool conurbations, the Manchester Ship Canal and the national road and public transport network’*. In the opinion of the Consortium, the current version of the Warrington Local Plan is missing an opportunity to capitalise on its unique position in the North West economy and act as a catalyst for growth in the city region and deliver sufficient numbers of high quality family and affordable homes.
- 1.17 Although the Consortium has serious concerns with this version of the Warrington Local Plan, the members are all of the opinion that to be sound, the issues can be addressed through amendments to the policies, interventions and the introduction of additional sustainable allocations of various sizes in the Green Belt to ensure the housing requirements are met and the Green Belt boundaries endure beyond the Plan period.
- 1.18 This Issues Report is accompanied by a series of Technical Papers which seeks to substantiate the points raised within. These Technical Papers are appended to his Report and include:
- 1 Note A – Housing Needs Analysis (Appendix A)
 - 2 Note B – Housing Land Supply Analysis (Appendix B)
 - 3 Note C – Fiddlers Ferry Technical Note (Appendix C)
 - 4 Note D – Viability Technical Note (Appendix D)

2.0 **Scope and Purpose of the Report**

- 2.1 It is important to emphasise at the outset that the Consortium members welcome the efforts undertaken to date by Warrington Council in the preparation of this Plan and appreciate the scale of task in preparing a comprehensive Plan. The group is keen to ensure that Warrington is not faced with the same situation it was when its previous Local Plan was challenged in the High Court and parts of the plan in relation to housing were overturned. This Issues Report has been prepared with the expressed intention of ultimately speeding the process up by ensuring that the current Plan and its evidence base can be altered and found sound at Examination.
- 2.2 Preparing a Local Plan is a complex and complicated matter particularly as the Government has introduced significant planning policy changes in recent years that have shifted the goalposts for strategic planning (most notably for housing). That said, the Consortium remains of the opinion that adopting a Local Plan for Warrington as soon as possible is very important. It is disappointing that the Council has decided to pursue less ambitious housing target in this iteration of the Plan and remove a number of draft allocations from the Plan despite working with developers over an extended period of time to demonstrate their deliverability.
- 2.3 The delays in preparing a Local Plan for Warrington and reviewing the 2014 Core Strategy has resulted in the Council failing the Housing Delivery Test and being unable to demonstrate a deliverable 5-year supply of housing land. The lack of progress with the Plan has undoubtedly had an impact on the lack of a suitable supply of housing sites as the number of allocations dwindle and positive interventions are required to address the issues have not been made.
- 2.4 Given the importance of having up to date Local Plans to direct and drive sustainable growth, the aim of this Issues Report is to assist Warrington's Planning Officers and the Inspector at the Examination in Public. It is in the Consortium's interest to see a Local Plan progress as quickly as possible but there are considerable concerns that the current UPSVLP will not be found sound without substantial changes being required. We consider that without substantial changes being undertaken, there is a significant risk that the Plan will be found unsound at Examination. This would be a very unsatisfactory outcome for everyone involved.
- 2.5 There is also a risk that if considerable amendments were made at the Examination stage (i.e. the inclusion of additional Green Belt release), then the local councillors may decide to reject the amended Plan which would unravel the entire Plan. The Warrington Local Plan is already politically loaded and pursuing a lower housing requirement in the view of the consortium has been a politically motivated decision. As such, there is a risk that the Plan will progress through Examination with changes including additional Green Belt releases only to fall at the final hurdle.
- 2.6 There is also a need to ensure that the changes are properly consulted upon with the wider public. As such, it is imperative that the plan which is submitted to the Secretary of State for Examination is sound and the modifications made through the Examination process are (as far as is possible) inconsequential.
- 2.7 The Consortium members are willing to engage as proactively as required with the relevant Planning Officers and assist in the plan making process. We would also be willing to explain in more detail the significant concerns raised in this Issues Report and the potential avenues to overcoming these matters which go to the very heart of the soundness of the emerging plan for Warrington.
- 2.8 This document will be used by the Consortium members as the foundation to inform individual representations to the Warrington Local Plan and will be a key element of Matter Papers should the Plan progress towards Examination. A significant proportion of the North West

housebuilding industry are members of this Consortium and their united front demonstrates the magnitude of the concerns they have with some of the emerging planning policies in the UPSVLP.

3.0 **Issue 1: Housing Requirement**

- 3.1 This section seeks to summarise the key issues in relation to the proposed housing set out in the emerging Plan and sets out some recommended actions to make the UPSVLP sound. It should be read in conjunction with the detailed Technical Note on Housing Requirement (Note A – Appendix 1) which provides further detailed analysis of the issues.

Explaining the Issue

- 3.2 The Framework sets out that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning policy (§60). The standard method uses the 2014 based household projections as a base and applies an adjustment to take account of the specific affordability ratio for an area.
- 3.3 Policy DEV1 confirms the Plan’s overall housing target of a minimum of 14,688 homes and sets out where new homes will be delivered and over what time period. The supporting text to this Policy clarifies that the 816 dpa target has been established using the Government’s Standard Housing Methodology and has been assessed within the Council’s Local Housing Needs Assessment Update [LHNAU] (2021).

“This represents the minimum number of homes that Warrington is expected to plan for, in a way which addresses projected household growth and historic under-supply. In parallel the Council has also updated its Economic Development Needs Assessment to ensure that the Plan’s housing and employment requirements are balanced.

The Local Housing Needs Assessment models the increased working age population that would result from a housing requirement of 816 homes per annum up to 2038 (15 years post the estimated adoption of the Plan). This increase in working age population is considered to be sufficient to support the number of additional jobs that are likely to be created in Warrington, taking into account the latest jobs forecasts for the Borough. Setting the housing requirement of the Plan to the minimum requirement under the Government’s methodology therefore has the potential to meet Warrington’s future housing needs and support its continued economic growth, whilst minimising the impact on the Borough’s Green Belt.” [paragraphs 4.1.6-4.1.9].

- 3.4 This initial LHN target is correct, but it represents only the starting point for identifying housing need in Warrington. The Government is quite clear that the figure derived by the SM2 is intended to be an absolute minimum figure. The PPG sets out the circumstances whereby a higher (or lower) figure might be considered. This is because the standard method does not attempt to predict the impact that future national or local government policies, such as the levelling up agenda, Warrington’s aspiration to become a City or their Northern Powerhouse aspirations may have on housing requirement figures. Nor does it account for changing economic circumstances (e.g. arising from the Covid-19 pandemic), or other factors that might impact demographic behaviour.
- 3.5 The Government is clear that the figure derived by the LHN target is intended to be a minimum figure, with justifications to go below this relating to environmental or policy constraints rather than issues over the reliability of the household projections:

“Local housing need does not represent a mandatory target – it is simply a starting point for planning, and local authorities may either choose to plan in excess of this or to conclude that they are not able to meet all housing need within their boundaries, for example due to constraints such as protected designations and Green Belt, or whether that need is better met elsewhere. This means there is flexibility for local authorities to manage movements in local housing need locally.”³

Warrington’s Local Housing Needs Assessment Update (August 2021)

- 3.6 GL Hearn’s Warrington Local Housing Needs Assessment Update [LHNAU] (August 2021) forms a key part of the Council’s evidence base helping to justify WBC’s decision to take forward the 816 dpa housing target derived from the Government’s SM2 in its emerging Local Plan.
- 3.7 The report is an update of GL Hearn’s 2019 Local Housing Need Assessment for WBC, which recommended a housing requirement of 945 dpa for Warrington; the Liverpool City Region Strategic Housing and Employment Land Market Assessment [SHELMA] completed in March 2018, identified an objectively assessed need for 949 dpa; the 2017 SHMA Update Warrington Addendum (955 dpa); and the Mid Mersey SHMA (January 2016) (839 dpa). As such, all previously prepared evidence base documents relating to housing requirement recommended a higher housing requirement for the authority.
- 3.8 The latest report [LHNAU 2021] confirms that the SM2 LHN figure for Warrington Borough of 816 dpa is based on a household growth figure of 715 dpa plus an affordability uplift of 14.2% (due to a high affordability ratio of 6.27 in 2020). No cap is applied as the Local Plan is more than 5 years old (and the housing target therein has been quashed in any case).
- 3.9 The report examines the scale of housing need required to meet the Borough’s economic ambitions. It analyses the latest Oxford Economics [OE] and Cambridge Econometrics [CE] employment forecasts over the plan period to provide a starting point to understand the number of new homes that would be needed to support jobs growth, and to test whether this could be accommodated within the 816 dpa LHN target.

Economic Forecasts

- 3.10 In analysing the forecasts, OE put forward an annual increase of 725 additional jobs per annum, whilst CE forecast 1,023. The Compound Annual Growth Rates [CAGR] between the previous OE and CE forecasts which informed the 2019 LHNA were comparable, at 0.39%. However, whilst both have increased (to 0.48% and 0.65% respectively), they have diverged on account of differing assumptions on the anticipated pace of the recovery of the economy from the effects of COVID-19. OE assumes a recovery of employment in 2021 whilst CE projects a greater loss in 2021 compared to 2020 [paragraph 6.14].
- 3.11 GL Hearn concluded that the CE forecasts are too optimistic while the OE forecasts are unduly pessimistic; therefore, the LHNAU arrived at a ‘mid-point’ forecast employment growth of **874 new jobs each year (14,855 over the plan period), with a CAGR of 0.57%**.

Affordable Housing

- 3.12 Moving on to affordable housing needs, the LHNAU report states that when looking at rented needs, the analysis **suggests a need for 423 affordable dwellings per annum**. There is also a need shown in all parts of the Borough. The 423 dpa figure represents a 12% increase on the 377 dpa affordable housing need identified in the 2019 LHNA and comprises well over 50%

³ MHCLG (October 2018): Technical consultation on updates to national planning policy and guidance, page 13

of the overall housing requirement despite the affordable housing policy seeking a requirement of 30%.

Critique

- 3.13 Lichfields has fundamental concerns with the approach taken by GL Hearn to define the LHN on a number of levels.

Alignment between Housing and Employment Requirements

- 3.14 The Consortium is concerned that both GL Hearn and the Council appear to have fundamentally misinterpreted the Local Plan's aspirations for economic growth. The UPSVLP congratulates itself on aligning its housing requirement with likely job growth:
- 3.15 *"The Local Housing Needs Assessment models the increased working age population that would result from a housing requirement of 816 dpa up to 2038 (15 years post the estimated adoption of the Plan). This increase in working age population is considered to be sufficient to support the number of additional jobs that are likely to be created in Warrington, taking into account the latest jobs forecasts for the Borough."* [paragraph 4.1.8]
- 3.16 Whilst it is true that GL Hearn has modelled both OE and CE job forecasts in its housing need assessment (and notwithstanding our fundamental criticisms of the approach used as set out above), both WBC and GL Hearn are missing the point. The UPSVLP is not planning for a level of employment growth commensurate with either the OE or CE projections. It is quite clearly planning to accommodate *"316.26 hectares of employment land to support both local and wider strategic employment needs"*, as set out in Policy DEV4.
- 3.17 The 316 ha employment land target does not align with either the OE or the CE projections and if, as expected, the majority of such land comes forward for development by 2038 it will undoubtedly accommodate far higher levels of employment than could be sustained by 816 dpa.
- 3.18 Taking a step back, it is important to understand where the 316.26 ha target has come from, and how it has been calculated. The supporting text to UPSVLP Policy DEV4 states that:
- 3.19 *"In determining the amount of employment land needed for the Plan period, the Economic Development Needs Assessment (2021) concluded that the preferred forecasting method for establishing need, is a projection forward of past take-up rates that considers both strategic and local needs, resulting in a need of 316.26 hectares of employment land up to 2038."* [paragraph 4.2.13]
- 3.20 Reference to WBC's *"Economic Development Needs Assessment Refresh"* [EDNA] (August 2021), produced by BE Group, indicates that this need is based on historic (24 years) take up from 1996/97-2019/20 of 14.22 ha per annum, including Omega, an adjustment for displacement and a 3 year buffer (see Table 20 of the EDNA). Table 43 of that report confirms that over that same time period, the Borough grew by 48,350 jobs, or **2,015 annually**. This equated to an employment land take up of 341.29 ha.
- 3.21 *"Table 39 shows that net jobs growth during the period, would have resulted in more modest land needs between 1996-2021 which represent only a fraction of what was taken up. Thus, the trend shows that net jobs growth is not an accurate method of calculating land. Even when land is calculated on the sectors that generate a positive jobs figure over the period, there is still a sizable shortfall between the anticipated land take-up from a jobs calculation and the actual market take up, particularly if strategic development at Omega is included. This calculation reinforces the view that historic take-up is the most appropriate method."* [EDNA 2021 paragraphs 7.83-7.84]

- 3.22 **Therefore, the Council’s own evidence suggests that they are planning for a level of employment land growth, at 316.26 ha, that in the past sustained 2,015 jobs annually – a figure 87% higher than the 1,078 p.a. job growth the 816 dpa SM2 housing target equates to** (according to Table 28 in GL Hearn’s Local Housing Needs Assessment Update, based on Census commuting patterns. If the 1:1 commuting pattern is applied, then the number of jobs falls to 945 per annum, an even bigger discrepancy).
- 3.23 It is also important to examine the employment land growth that the much lower OE and CE baselines can sustain. According to Table 44 of that report, the EDNA models the following job growth scenarios:
- OE Baseline: 12,319 net job growth. This equates to a need for 77.28 ha of employment land; and,
 - CE Baseline: 17,391 jobs growth. This equates to a need for 87.61 ha of employment land.
- 3.24 Unhelpfully, BE Group’s EDNA Update did not model the employment land implications either of the 816 dpa SM2 target or the mid-point OE/CE jobs growth figure of 14,855.
- 3.25 Our conclusion is that the Council’s employment land and housing targets are fundamentally misaligned. According to GL Hearn, the housing target of 816 dpa can sustain between 16,069 and 18,328 jobs; however, the UPSVLP’s employment land target of 316.26 ha is likely to generate at least 34,255 jobs (@2,015 per annum), a figure that is almost double the mid-point GL Hearn figure.
- 3.26 The UPSVLP gives the impression that local authorities must go with the standard methodology figure for LHN, and that only in very exceptional circumstances can a departure be permitted:
- “The standard housing methodology defines the minimum housing requirement for a Council’s area. The updated PSVLP is proposing to meet this requirement but is no longer proposing an additional uplift, based on revised estimates of jobs creation over the Plan Period.”* [Appendix 1, Council response to issues raised from representors, page 393]
- 3.27 However, the PPG clearly states that *“The government is committed to ensuring that more homes are built and **supports ambitious authorities who want to plan for growth.** The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area.”*
- 3.28 The plain truth is that it is impossible for the Government to achieve its target of 300,000 homes a year through the use of the SM2 alone; it is reliant on ambitious pro-growth districts to go above and beyond their LHN. At present, the nationwide figure is only 289,174 dpa in the highly unlikely event that every district delivers its minimum SM2 LHN. Whilst a few districts are going above their LHN figure, these are more than counteracted at present by the heavy reliance on London and the South East to see an improbable step change in delivery. This is not going to happen for the foreseeable future – London, for example, has an SM2 target of 85,542 dpa, which is an order of magnitude above the current London Plan target of 52,287 dpa and 133% above recent delivery rates (just 36,686 dpa over the past 3 years).

Market Signals

- 3.29 Warrington Borough has by far the highest median and Lower Quartile house prices across the Mid-Mersey area and the North West more generally. As of September 2020, median house prices are £195,000 in Warrington, a rise of 195% since 2000. This results in a Median workplace-based Affordability Ratio of 6.27, which is also well above the 5.16 recorded in St Helens, 4.84 in Halton and 5.75 in the North West more generally. Although these figures

⁴ PPG 2a-010-20201216

(including the rate of change) are lower than the England and Wales average, clearly this latter figure includes London and the wider South East which skews the numbers to an extent. Similarly, Lower Quartile house prices in Warrington Borough are far higher than the comparator areas with the exception of England and Wales, resulting in an LQ workplace-based Affordability Ratio of 6.12 compared to 5.55 across the North West.

- 3.30 Warrington Borough’s median house prices have increased in recent years, and how this has impacted on people’s ability to afford them. Interestingly, there has been a dip in the AR for 2020, declining from 6.75 in 2019 to 6.27, although this appears to be due to an unusually high spike in median earnings for that year, which increased from £28,145 in 2019 to £31,094 in 2020 – an increase that was higher than the past 12 years’ growth put together (which could suggest that this was an anomaly). Median house prices continue to creep upwards in Warrington at a fast pace.

Northern Powerhouse & Levelling Up Agenda

- 3.31 Warrington is clearly a key driver of growth for the Northern Powerhouse – it is economically strong, politically advanced and highly accessible by road and rail. As set out on Warrington & Co’s website, the Borough has access to a 2.5 million strong workforce and 2 international airports within a 30-minute drivetime; has 98% superfast broadband coverage and £170 million in highway investments between 2015 and 2021. It also contains a number of prominent European and UK Headquarters including companies such as United Utilities, Electricity North West, MHI Vestas Offshore Wind UK, Sellafield Ltd, Nuvia UK, New Balance, Sonova UK, Cavendish Nuclear, European Metal Recycling and Certas Energy⁵. As part of the wider Cheshire and Warrington LEP area, which is one of the most productive in the country outside London and the South East, Warrington is exceptionally well placed to benefit from the Government’s future investment programme.
- 3.32 The Northern Powerhouse has now arguably been subsumed within the Government’s ‘Levelling Up’ agenda, which was first raised in Boris Johnson’s first speech as Prime Minister, and subsequently addressed in the Conservative Party’s 2019 election manifesto. This pledged “*to use our post-Brexit freedoms to build prosperity and strengthen and level up every part of the country*”, through specific measures such as investing in towns, cities, and rural and coastal areas; giving those areas more control of how investment is made; levelling up skills using apprenticeships and a £3bn National Skills Fund; and creating up to 10 freeports to help deprived communities. Similarly, the 2021 Queen’s Speech stated that the Government will “*level up opportunities across all parts of the United Kingdom, supporting jobs, businesses and economic growth and addressing the impact of the pandemic on public services.*”

Affordable Housing Need

- 3.33 The PPG summarises the approach that should be taken to analysing affordable housing needs. It clearly states that the resultant affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments:

⁵ <https://warringtonandco.com/economy>

*"The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."*⁶

- 3.34 The reference to uplifting the housing figures in the Plan to help deliver affordable housing need suggests that this is a component part of the calculation of the housing requirement, rather than the LHN.
- 3.35 The latest update to the Warrington Local Housing Need Assessment (August 2021) identifies a very high level of affordable housing need, equal to 423 dpa, having risen from 377 dpa in the 2019 study (an increase of 14.9%).
- 3.36 Although the LHNAU accepts that this is a high level of need which suggests that the Council is justified in seeking to secure additional affordable housing across the Borough, it also takes great pains to suggest that these final figures are not targets for affordable housebuilding but a check to understand likely future demand. To head off the arguments set out above, it states that *"this does not in itself provide justification for an increase in the HNF to address affordable housing need. It is important to note that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise."* [§1.47-1.48]
- 3.37 The LHNAU is right to suggest that the relationship between affordable housing need and how this translates to overall housing need is not straightforward; however, to suggest that it can play no part in determining the overall housing requirement is patently false. Clearly one very obvious way of boosting affordable housing delivery would be to allocate more deliverable housing sites in strong market locations that are capable of providing high levels of social housing as part of s106 agreements.
- 3.38 The UPSVLP accepts that increasing the delivery of affordable housing across the Plan area should be a priority, and it will be essential that new residential developments play a full role in supporting this:
- "The NPPF makes it clear that affordable housing should be provided on major residential schemes and not minor developments (under 10 homes). The policy requires that 30% affordable housing is provided in the majority of Borough, excluding brownfield sites in inner Warrington and the Town Centre where required provision is lower at 20%. This recognises the lower level of viability in Inner Warrington in accordance with the Local Plan Viability Assessment (2021)."* [§4.1.36]
- 3.39 Even if 30% of WBC's entire housing target of 816 dpa were to come forward as social housing, this would only equate to 245 dpa, or 4,406 dwellings over the 18-year plan period. This is only 58% of the identified requirement.

Consortium's Objectively Assessed Need

- 3.40 Based on the detailed technical assessment undertaken by Lichfields on behalf the Consortium (set out in detail in Section 4 of the accompanying Housing Needs Technical Paper – Appendix 1), **a housing requirement of 1,015 dpa is the minimum it should be planning for.** This is more closely in line with the 945 dpa target that was proposed in the previous March 2019 WLP submission version draft, which addressed prospective economic growth prospects.

⁶ ID: 2a-024-20190220

- 3.41 Ideally, the Council should ensure that the housing target aligns with its employment land target. The Consortium is fervently of the opinion that there is absolutely no chance that 816 dpa can sustainably accommodate the increase in workforce that would be associated with 316 hectares of employment land. Based on the Council's own evidence base (BE Group's 2021 EDNA Update), the 316 ha of employment land could be expected to align with a level of job growth equal to over 36,260 – more than triple the level realistically associated with 816 dpa. The actual housing target that could robustly accommodate this level of job growth would range from 1,545 dpa to 1,592 dpa by 2039, depending on whether PCU rates are applied.
- 3.42 The Consortium's view is therefore that a (rounded) target of 1,015 dpa should be taken forward in the UPSVLP, which aligns with the mid-point economic growth, adjusted for PCC rates. This was the approach formerly taken forward by its housing consultants in GL Hearn in 2019, with no robust justification for departing from it and some very clear errors in their latest update which invalidates the conclusions of their 2021 study. Given that this still does not align fully with the Council's very ambitious employment land target, this figure could legitimately be increased (which would also more closely align with the affordable housing need of 423 dpa, which, at 30%, would equate to 1,410 dpa). The 1,015 dpa would meet over 70% of the total affordable housing need if 30% of all units came forward as social housing.

Recommended Action

- 3.43 The Consortium considers that the LHN derived from the Government's SM2 should only be the starting point for determining WBC's housing target, and there are clear and indisputable arguments to go significantly higher. The decision by the Council's housing consultants to abandon the previous alignment with jobs growth is unfounded and supported by a flawed evidence base. In particular, the misalignment with current economic growth, and specifically employment land, objectives, means that the Plan is fundamentally unsound and its evidence misaligned.
- 3.44 Warrington's historically pro-growth agenda and the high levels of housing delivery that were once a badge of civic pride have long since been abandoned. It is now one of the poorest performing Councils in North West England based on the Housing Delivery Test, yet no effort is being made to boost delivery to help fulfil the Government's Levelling Up agenda.
- 3.45 Furthermore, the very high levels of affordable housing need across the Borough, which could justify an uplift to the housing requirement, have been ignored yet again despite the High Court quashing the housing policies of Warrington's current adopted Core Strategy back in 2015 partly because WBC had failed to accurately consider whether an increase in the total housing figure included in the UPSVLP could help deliver the required number of affordable homes⁷.
- 3.46 Although the housing market is complex and can be impacted by macro-economic factors as well as Government policy intervention, it is accepted that increasing the supply of housing assists in suppressing worsening affordability issues. Although it is not the only solution, it is clearly a very important one and one that WBC has most control over. Housing land availability and, by extension, housing supply in Warrington has been restricted and constrained for a number of years by the tightly drawn Green Belt boundaries across the Borough and the lack of a positively prepared and up-to-date plan that identifies sufficient land to meet needs has certainly been a contributing factor to the long-term trend of worsening affordability.
- 3.47 It is worth bearing in mind that the standard method figure is predominantly based on official household projections which are trend-based and effectively 'lock in' trends in constrained household formation over the past number of years. Limiting the supply of land through failing

⁷ Satnam Millennium v Warrington Borough Council (February 2015). EWHC370

to prepare its Local Plan and updating it on a regular basis has constrained the ability of Warrington families to become homeowners.

3.48 Although the standard method does apply a modest uplift based on the affordability issues of the authority at the time, it does not take into account worsening trends over time, hence a more significant uplift should be applied and a high housing requirement pursued which is not backloaded.

3.49 Based on the detailed technical analysis undertaken by the Council as set out in the accompanying Technical Note on Housing Needs (Appendix 1), to align the proposed economic growth with the housing requirement would derive a housing requirement of at least 1,015 dpa and it is considered that this would address realistic economic growth targets and help to deliver over 70% of the identified affordable housing need.

The Consequences for the Plan's Soundness Without Modification

3.50 In conclusion, without detailed evidence being presented which explores the possibility of increasing the housing requirement in Warrington (which should run through the Sustainability Appraisal testing process), there is a significant risk that the UPSVLP will be found unsound at Examination and LPA will need to start the plan preparation process from the beginning again. In the context of national planning policy and Government's stated ambitions regarding the levelling up agenda, the Northern Powerhouse aspirations and the need to significantly increase the supply of housing particularly affordable units, there are clear circumstances in Warrington where it is appropriate to consider a significantly higher level of housing provision than the standard method indicates.

4.0 **Issue 2: Staggered Housing Requirement**

Explaining the Issue

4.1 National planning policy seeks to ‘*significantly boost the supply of homes.*’ Although Warrington is seeking to pursue the minimum annual housing requirement derived from the Standard Method, it is also seeking to backload this figure and deliver less homes in the early part of the Plan period. Policy DEV1 (Housing Delivery) states that:

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

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

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

Should monitoring indicate that a 5-year deliverable and / or subsequent developable supply of housing land over the Plan Period can no longer be sustained, the Council will give consideration to a review or partial review of the Local Plan.”

4.2 The supporting text to this Policy claims that the need to release Green Belt land and the lead-in times for the infrastructure required to support the larger allocation sites means that there will be a relatively lower level of housing delivery in the early years of the Plan Period, with housing delivery increasing over time.

4.3 Whilst it is acknowledged that Warrington has some larger strategic sites on Green Belt land that may come forward in the Plan, this should not be used as an excuse to postpone meeting households needs in full. It is quite clear that Warrington’s approach of backloading the housing land supply towards the end of the Plan period is aimed squarely at manipulating the housing requirement to ensure it can demonstrate a 5YHLS upon adoption and help defend appeal situations. As detailed in the accompanying Technical Paper on housing land supply, the Council cannot demonstrate a 5-year supply of housing land. An Inspector at a recent appeal in Warrington (September 2021)⁸, set out that the Council only had a 3.4-year housing land supply. This is a significant issue which requires immediate attention rather than the current approach of ignoring it and hoping it can be resolved later in the Plan period.

4.4 The approach being pursued by Warrington is at variance with the Planning Advisory Service [PAS] Guidance (Good Plan Making Guide) which states that the trajectory should relate to housing need and ‘*there is little point in planning to provide additional housing in the latter part of the plan period if the need is for housing in the early plan period*’ [§6.13].

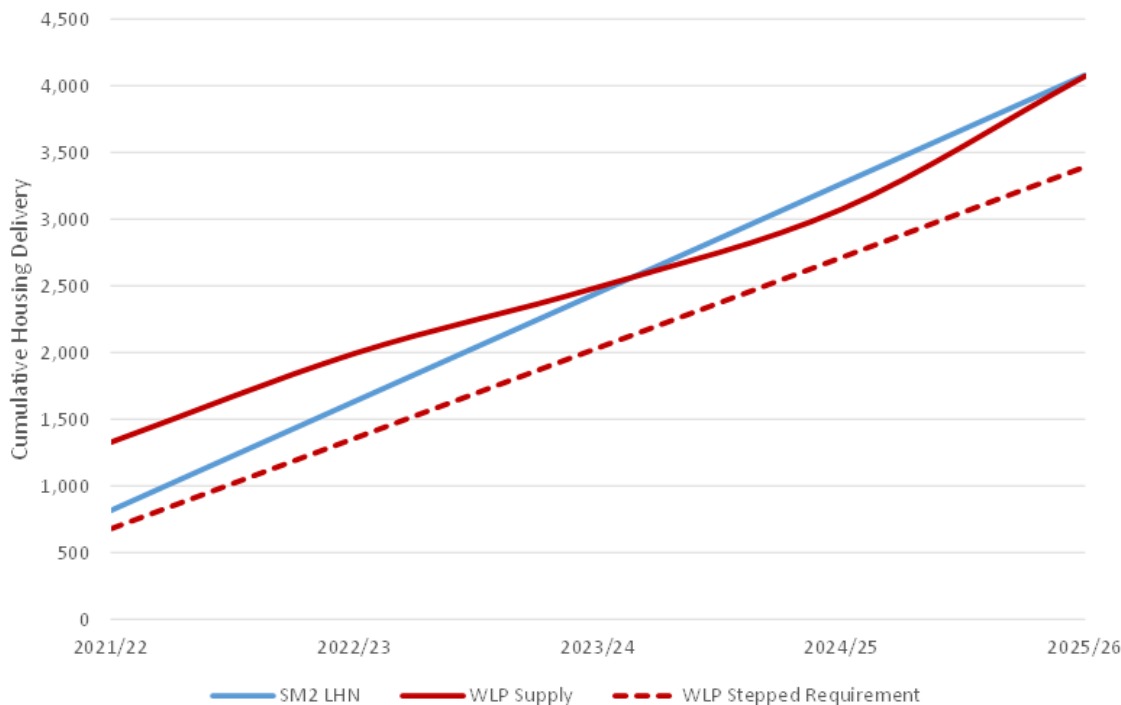
4.5 The Council considers it can deliver 814 dpa over the first 5 years, but that by manipulating the need down to an arbitrary and untested 678 dpa, it can claim it has factored in a 20% buffer to the supply, and therefore the 5YHLS hurdle it would otherwise fail. This is not an acceptable position given that the Council has consistently underdelivered over recent years against its minimum housing target and is unable to demonstrate a 5-year supply of housing land.

4.6 Figure 4.1 indicates that the Council considers it can deliver 814 dpa over the first 5 years, but that by manipulating the need down to an untested 678 dpa, it can erroneously claim it has factored in a 20% buffer to the supply, thus avoiding the 5YHLS hurdle it would otherwise fail. This cannot be a satisfactory state of affairs, given that the Council has delivered on average just

⁸ Appeal Ref: APP/M0655/W/21/3271800, New House Farm, Hatton Lane, Hatton, Warrington, Inspector’s Decision (dated 22nd September 2021) paragraph 54

562 dpa over the past 10 years⁹ and fails the Housing Delivery Test by a greater margin of any Council in northern England (with the exceptions of Calderdale and Bury).

Figure 4.1 Implications of backloading the Housing Delivery for Warrington for the first 5 years of the Plan



Source: Warrington Local Plan (2021) Appendix 1 Housing Trajectory / Lichfields Analysis

- 4.7 The reason national policy applies a 20% buffer to Council’s 5-year housing land supply where they have persistently underdelivered is in an attempt to boost supply and resolve issues in the short term. Arbitrarily manipulating the housing requirement to artificially demonstrate a claimed supply of housing land is a flawed approach on many levels and is the antithesis of positive planning. It will do nothing to achieve the Government’s ambition of significantly boosting the supply of housing land or addressing the significant affordability issues in Warrington.
- 4.8 The stepped approach to the Borough’s housing requirement adopted by the Council is completely at odds with the Government’s requirement to deliver the homes that are needed as soon as possible. Thousands of Warrington households are in acute housing need now. They cannot be waiting ten years or more for housing to be delivered – this will result in rapidly increasing house prices, worsening affordability, homelessness and poverty.
- 4.9 To address the Council’s point that “*such an approach is appropriate where strategic sites such as those being proposed by the Council will have a phased delivery or are likely to be delivered later in the plan period*”, it has already banked 580 units on Green Belt sites in the first 5 years of the Local Plan, which would undermine any argument that the provision of a range of additional reasonably-sized Green Belt allocations could not be included in the 5YHLS to meet the very pressing housing needs of the Borough.
- 4.10 Whilst the masterplanning and infrastructure investments required to support the development of some sites, including many of the allocations in the Plan, means that they may only produce large numbers of new dwellings in the latter phases of the plan period, this does not apply to all of them and some will undoubtedly be able to deliver homes quickly once the Plan is adopted.

⁹ MHCLG (2021): Table 122, Net additional dwellings¹ by local authority district, England, 2001-02 to 2019-20

- 4.11 Allowing the backloading of the housing requirement in the Warrington Local Plan will effectively validate the Council's inability to plan positively and ensure a consistent supply of housing land. Warrington Council is currently failing its housing delivery test and is unable to demonstrate a 5-year supply of land because it has not kept its Local Plan up to date with sufficient allocations coming through the pipeline. Adopting a staggered housing required will justify their failures and will effectively sweep this issue under the carpet rather than tackle it head on. It will do nothing to resolve the very serious housing issues being experienced currently in Warrington.

Recommended Action

- 4.12 The Council seeks to phase the delivery of its housing requirement with a sizeable proportion of the supply being unjustifiably backloaded to the latter period of the plan. However, it is the Consortium's strong view that the Council should, as a minimum, apply an even approach across the plan period of 816 dpa (although the Consortium considers that this should be higher – see Issue 1), including in the first 5 years. The Consortium would also advocate an approach that goes beyond this and instead of pushing need to the end of the Plan period, the buffer should instead be brought forward to ensure that a sufficient supply of land comes forward for development in the early years.
- 4.13 To accord with the Framework [§59], the Consortium considers that, in the future, a balanced strategy should be adopted, identifying a suitable supply of brownfield and greenfield sites that responds to an evidenced-based assessment regarding the size, type and tenure required. This should ensure that supply included in the Plan is capable of meeting specific needs of housing market areas in the sub-region. If a significant proportion of the Plan's supply comprises large strategic sites, then a suitable supply of smaller, deliverable greenfield sites must also be identified to offset the infrastructure challenges strategic sites will face in coming forward any sooner.
- 4.14 The Consortium realise that brownfield sites play a very important role in the delivery of sustainable development and addressing the housing crisis, but the lack of supply needs to be urgently addressed by the inclusion of additional greenfield and Green Belt sites.
- 4.15 The most appropriate solution is therefore the identification of smaller, more sustainable and deliverable Green Belt allocations which can assist in meeting the housing needs in the first few years of the Plan. The Consortium considers that an appropriate action would be to identify additional land and increase the housing requirement in the early years of the Plan to increase flexibility and safeguard against any issues faced by the deliverable sites identified in the supply.

The Consequences for the Plan's Soundness Without Modification

- 4.16 The Housing Consortium considers that the phased approach to housing delivery over the Warrington Local Plan period is fundamentally flawed and unsound, as it is not positively prepared, justified, effective or consistent with national policy. The emerging Plan and its evidence base do not provide any robust justification for including a phased housing requirement which significantly reduces delivery in the first five years of the Plan.
- 4.17 This approach conflicts with the objectives of the Framework and the Consortium believes that the approach taken is not sound and will not meet the tests of soundness when the Plan is undergoing Examination in Public.

5.0 **Issue 3: Housing Land Supply Concerns**

Explaining the Issue

- 5.1 Having assessed the supply trajectory set out by Warrington to justify their claimed supply position, the Consortium is of the opinion that the approach taken and the conclusions in relation to supply are flawed and clearly seek to exaggerate the developable supply of housing land. The Consortium also has concerns in relation to the Council's claimed deliverable 5-year housing land supply position [5YHLS], as well as the diversity of the claimed supply, the density assumptions used for site capacities and the Council's approach to the windfall allowance used in its supply. The Consortium has serious concerns with the wider housing trajectory and the fact that the sites will not deliver as the Council anticipates through the entire plan period.
- 5.2 The Framework states that *'to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed'* [§60]. In order to maintain housing supply and delivery, and also to offer choice to the market, the Framework [§74] requires plan-making authorities to factor in a buffer when considering their supply of deliverable sites, brought forward from later in the plan period.
- 5.3 For a site to be considered deliverable, the Framework states that *'sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years'*. For a site to be considered developable in the plan period, the Framework makes it clear that the site *'should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged'* [Annex 2].
- 5.4 At the outset it should also be noted that the Consortium is disappointed with the lack of an up to date SHLAA being released. The latest SHLAA which has been released to support the Publication Version of the Local Plan is dated 2020. The Council has indicated that it will be releasing a new SHLAA immediately post conclusion of this consultation exercise. The Consortium considers that this approach is a fundamentally flawed. It undermines the credibility of the process and the transparency of the evidence base and represents poor practice in preparing a new Local Plan.

Land Supply Concerns

Analysis of Developable Supply (SHLAA Sites)

- 5.5 To substantiate the Consortium's concerns in relation to the claimed supply, the Consortium has undertaken a detailed and thorough assessment of a significant proportion of the Council's housing land supply focusing primarily on the larger sites with capacity to deliver 50 or more units. In total, there were 44 sites with capacity to deliver 50 or more units, equating to a combined capacity of 3,362 dwellings (28.5% of the overall supply). Where we agreed with the Council's approach, we have not assessed the sites.
- 5.6 Based on the detailed site analysis, the Consortium has identified numerous issues with a number of the sites which were assessed. As such, and in the context of the definition of deliverable and developable set out in the Framework, the Consortium has sought to alter the trajectory for 20 of the sites. The Consortium is also of the opinion that at least 1,610 dwellings needs to be removed from the supply trajectory. This equates to a reduction of 22.5% of the supply from the assessed sites, which represents a significant proportion of the sample size as well as the overall claimed supply set out in the SHLAA (13.7%).

- 5.7 The analysis of sites where the Consortium raised concerns with the proposed delivery rates or capacity of the site is set out in the Technical Note on Housing Land Supply (Appendix 2). The Consortium's revised site capacity and trajectory based on the analysis is set out below in Table 5.1.

Table 5.1 Council v Consortium's Claimed Housing Land Supply Position

Warrington Local Plan (2021) - Site Capacity and Trajectory			
	Overall Capacity	3362	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	388	1459	1515
Consortium's Capacity Analysis			
	Overall Capacity	1752	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	165	326	1261

- 5.8 In general, the Consortium is disappointed with the level of information provided to justify the proposed levels of supply and is of the opinion that it falls somewhat short of what would ordinarily be expected at this stage in the preparation of a plan. The Consortium considers that the acute lack of information to justify and substantiate the Council's rationale for justifying the inclusion of particular sites is extremely problematic.
- 5.9 Where sites have no extant permission or live application, little if any information is provided on the willingness of the landowner to bring forward their land, the suitability of the site to accommodate development, justification for the claimed site capacity and the likely viability of the site bearing in mind future policy aspirations and infrastructure requirements. The Consortium also has concerns in relation to the overall loss of retail and commercial floorspace as a result of the claimed supply on sites in the urban area on currently occupied sites.
- 5.10 Furthermore, the Consortium's suggested reduction in the supply is purely from the 44 sites assessed. The Consortium is of the opinion that there are likely to be a similar level of issues associated with other sites in the Council's trajectory. If the site by site analysis was extended beyond the 44 sites selected and dealt with sites below 50 units, they are firmly of the opinion that a significant number of other issues would also be identified, and a similar level of discount is likely to be justified across the entire claimed supply.
- 5.11 A detailed re-evaluation of claimed supply trajectory is required by the Council alongside the release of additional justification for each site ahead of any Examination in Public taking place. This is likely to result in the removal of a significant proportion of the claimed housing land supply and there will be a need to find new allocations to meet the need. Indeed, as we set out below and in the Housing Supply Technical Note (Appendix 2) there is a need to identify at least 2,488 dwellings.

Overestimation of Densities

- 5.12 Policy DEV1 of the Warrington Local Plan sets out that residential development sites should optimise the amount of housing developed on sites and sets the following minimum densities:
- At least 130 dph on sites within the defined Town Centre of Warrington;
 - At least 50 dph on sites that are within the wider Town Centre Masterplan and adjacent to district centres or other locations well served by frequent bus or train services;
 - At least 30 dph on other sites that are within an existing urban area

- 5.13 The Consortium is of the opinion that the density of 130 dph and 50 dph are too prescriptive and there may be instances where the delivery of this rate is inappropriate. It also bears no regard to the identified needs in the SHMA for 65% of future market dwellings to comprise 3 and 4 bed dwellings delivering schemes at 130dph will deliver only apartments and cannot possible deliver any 3&4 bed units to accord with the findings of the Housing Needs Assessment.
- 5.14 The evidence to justify the proposed minimum densities in set out in Appendix 4 of the SHLAA 2020. The evidence presented in Appendix 4 is very dated with a number of the permissions dating back to 2000, 2003 and 2004. Furthermore, the most recent permission being relied upon in Appendix 4 is from 2018 (Ref: 2018/31871) which received permission on 13th December 2018 (almost 3 years ago). It is unclear why no more up to date applications were considered in the formulation of this piece of evidence.
- 5.15 Not only that, there is no indication of whether any of the permission stated in Appendix 4 have actually been delivered. Securing permission on a site for a specific density is only part of the story and delivering high densities schemes is often complicated and permissions can lapse. Rather than relying purely on permissions, it would be more appropriate to only rely on permissions which have been delivered.
- 5.16 The Consortium is even more concerned by the densities being advocated in the Warrington Town Centre Masterplan. To justify the delivery of 8,000 dwellings in the Town Centre area, the masterplan sets out that *'the intention is to achieve residential densities of 240 units per hectare in the heart of the Town Centre'*. Delivering a density of 240 dph in Warrington is extremely challenging for a number of reasons, but it will also be impossible to deliver any family homes to accord with the mix set out in the Housing Needs Assessment at such a density. It is not clear why there is such a mismatch between the suggested density in Policy DEV1 and the density used to derive a capacity of 8,000 units in the Council's Town Centre Masterplan.

Windfall Allowance

- 5.17 The Council's supply includes an allowance for windfall sites or a 'small sites' allowance (sites under 0.25ha) of 81dpa for the full plan period, which is based on Warrington's historic windfall delivery rates for the period 2010-2020. This equates to an overall supply of 1,458 dwellings. The Consortium considers that this represents an overreliance on windfall sites within the supply, and it is likely that the high level of planned delivery in the Local Plan has been dictated by the lack of an up-to-date Local Plan and the resultant absence of housing allocations. This has clearly necessitated higher delivery on small sites in order to boost supply (particularly for the period 2016-2020).
- 5.18 The Consortium considers that the approach being pursued by the Council is not appropriate, as historic windfall delivery rates have been pushed higher than would normally be expected or considered appropriate due to a lack of housing allocations. It is also not considered appropriate in the context of the emerging Local Plan, which provides an opportunity to allocate suitable and sustainable sites across the Borough, and subsequently reduce the Council's historic reliance on windfall sites for the upcoming plan period.
- 5.19 In addition to the Consortium's concerns with the over-reliance on windfall sites, there are concerns over the delivery of windfall sites in the trajectory. The supply trajectory includes a small sites allowance in years 1-3 of the plan period (2021-2024) of 81dpa. However, it is considered that the Council should not be including windfalls within the first three years of the plan period.

- 5.20 Windfall sites have not yet obtained planning permission and will take time to come forward both through the planning process and to progress to completion. Lichfield research¹⁰ indicates that for sites of 0 to 99 dwellings it takes almost three years to progress to the delivery of the first dwelling, and larger sites even longer to come forward. The first year of delivery will have a lower build rate due to initial site preparation work which needs to take place before the first units can be completed. It is therefore reasonable to allow for at least three years before including a windfall allowance.

Five Year Housing Land Supply

- 5.21 The Consortium has not undertaken a full assessment of the Council's claimed supply and as such has not calculated its actual 5YHLS position. However, the Consortium has carried out a basic assessment of the 5YHLS based on analysis carried out on a proportion of the Council's supply and has considerable concerns in relation to the Council's ability to meet the requirements of §74 of the Framework.
- 5.22 The Consortium's 5YHLS analysis is set out in full in the Housing Land Supply Technical Note (Appendix 2). The analysis concludes that there is a shortfall of at least 1,326 dwellings in the first 5 years of the plan period. As such, it is clear that the Council cannot demonstrate a 5-year supply of housing (3.64 years), and in fact falls significantly short of where it should be. This is even without assessing the full extent of the Council's claimed supply (i.e. every site included in the supply for the first 5 years of the plan period). A recent appeal decision accords with this analysis too and concluded that Warrington had a 3.4-year supply¹¹.

Claimed SHLAA Capacity

- 5.23 The Consortium also holds concern in relation to the level of claimed supply set out in the Council's SHLAA (2020). Local Plan Policy DEV1 sets out that the SHLAA identifies a developable capacity for a minimum of 11,785 new homes. The latest SHLAA which has been released to support the Publication Version of the Local Plan is dated 2020. The SHLAA 2020 sets out a total supply of 10,430. Policy DEV1 explicitly states that the supply in the SHLAA is 11,875 and therefore there is an unexplained allowance for 1,355 dwellings. This is a fundamental concern and undermines the credibility of the Council's evidence and the transparency in the process.
- 5.24 No scrutiny of the Council's full supply can be undertaken and this is a fundamental failing of the Council's evidence and simply the wrong approach to take by the Council. As such, the additional supply which the Council claim for the last 3 years of the Plan from urban sites cannot be accounted for as no evidence is available in relation to these sites.
- 5.25 The approach being taken by the Council is misleading and is not sound as the claimed supply of 11,755 is unjustified. It is also disappointing that the Council is considering releasing a new SHLAA later this year once the consultation period closes on the Local Plan. It is unclear why the Council could not have updated and released their evidence at the same time as the Local Plan consultation and this approach does not represent good planning practice.

Recommended Action

- 5.26 An expressed intention of the Framework is to boost the supply of housing in an effort to address the housing crisis. With this in mind, the Consortium is firmly of the opinion that the Council has artificially inflated the claimed supply with the sole intention of trying to minimise

¹⁰ Lichfields 'Start to Finish' Research document (November 2016)

¹¹ Appeal Ref: APP/M0655/W/21/3271800, New House Farm, Hatton Lane, Hatton, Warrington, Inspector's Decision (dated 22nd September 2021) paragraph 54

the amount of Green Belt land released for housing, regardless of the deliverability of the claimed supply.

- 5.27 The Consortium has considerable concerns with the majority of the sites included in the Council's supply, and the Council's assumptions on a large number of sites are flawed and do not meet the tests of deliverable and developable as set out in Annex 2 of the Framework. The Consortium considers that the supply is significantly less than envisaged by the Council. Furthermore, the Consortium considers that the Council should not include windfalls in years 1-3 of the plan period, and a further 595 dwellings should also be discounted from the supply based on analysis conducted in relation to the Fiddler's Ferry strategic site (see analysis set out in Issue 4 and the Technical Paper on the site – Appendix 3).
- 5.28 As a result, in terms of the supply over the Local Plan period, the Consortium considers that the Council has a shortfall in the developable supply of 2,448 dwellings when assessed against the Borough's LHN (816 dpa). When considered against the housing requirement considered necessary by the Consortium (1,015 dpa), there is a shortfall of 6,388 dwellings. The Consortium's land supply position for the plan period for both scenarios (as well as the Council's position) is set out in Table 5.2.

Table 5.2 Consortium's Land Supply Analysis

	Council's Land Supply Position	Consortium's Land Supply Position (LHN)	Consortium's Land Supply Position (Revised Housing Requirement Figure)
Annual Target	816	816	1,015
2021 to 2038 (18-year plan period)	14,688	14,688	18,270
Flexibility (+10%)	1,469	1,469	1,827
Total Housing Requirement	16,157	16,157	20,097
Council's Overall Developable Supply (Urban Capacity excluding Green Belt Supply)	11,785	11,785	11,785
Supply Reduction (based on Consortium's analysis) (Developable Supply Reduction; Windfall Allowance Reduction; Fiddler's Ferry Supply Reduction)	/	2,448	2,448
Overall Developable Supply (Urban Capacity)	11,785	9,337	9,337
Shortfall in Developable Supply (Urban Capacity against Total Housing Requirement)	/	6,820	10,760
Existing Green Belt Supply	4,372	4,372	4,372
Additional Green Belt Supply Required	/	2,448	6,388

- 5.29 The Consortium therefore considers that the only option available to the Council to significantly boost the supply of housing and address the clear shortfall is to identify additional Green Belt land for release for housing. As set out in Table 5.2, the Council need to identify additional supply of 2,448 dwellings on Green Belt land if pursuing the LHN housing requirement, or 6,388 dwellings should the Council pursue a figure which accords with the Consortium's revised housing requirement.
- 5.30 Identifying additional Green Belt land would also help to address the Consortium's concerns in relation to the diversity of the current land supply, as large greenfield developments are more able to deliver larger 3 and 4 bedroom homes than constrained sites in the urban area. This will assist in meeting the identified needs in the SHMA for 65% of future market dwellings to comprise 3 and 4 bed dwellings.
- 5.31 The Consortium also considers that that there is a shortfall of at least 1,326 dwellings in the first 5 years of the plan period. As such, it is clear that the Council cannot demonstrate a 5-year supply of housing (at best 3.64 years). The lack of a deliverable supply needs to be urgently addressed by the inclusion of additional greenfield and Green Belt sites.
- 5.32 The Consortium therefore strongly advocates the identification, through an appropriate evidence base, of a number of smaller and sustainably located Green Belt releases for residential development (i.e. sites with capacity to deliver 200-500 units). These sites would be able to come forward immediately upon adoption of the Warrington Local Plan and negate the need to backload the housing requirement. It would also seek to tackle the ever-worsening housing crisis in the Borough and would ensure that the Council can demonstrate an adequate 5YHLS position.

The Consequences for the Plan's Soundness Without Modification

- 5.33 The Consortium has highlighted a number of fundamental issues in relation to the Council's claimed supply for the plan period, which result in a significant shortfall in the Council's claimed supply against their total housing requirement for the plan period. The main consequence of failing to identify a sufficient level of housing allocations will be that the Local Plan will be found unsound at Examination or at the very least will be subject to substantive changes at the Examination stage which will delay the formal adoption of the Plan. If this plan is pursued without significant additional allocations it will not be found sound at examination.
- 5.34 Furthermore, if the Council cannot adequately demonstrate a 5-year supply of housing then the Plan will fail immediately post adoption.

6.0 **Issue 4: Fiddlers Ferry**

- 6.1 A detailed Technical Paper on the Fiddlers Ferry site has been prepared and the content of Issue 4 should be read in conjunction with the Technical Paper (Appendix 3).
- 6.2 The former Fiddlers Ferry Power Station was a coal fired power station which commenced generating electricity in 1971 and operated until it was closed in March 2021. The site is located to the south of A562 Widnes Road. Together with associated land, the site comprises a total of 324 hectares, extending south beyond the St Helen's Canal and the Widnes to Warrington Railway Line, to the River Mersey.
- 6.3 The site to the north of the railway line is currently dominated by the former power station infrastructure, with its 8 cooling towers, turbine hall, substation and numerous building and equipment in the form of conveyors, pipework and operational and administrative buildings. The site also encompasses welfare uses for former employees, including a sports pitch and angling lake to the north.
- 6.4 On the western side of the site is a large coal storage area, or coal pad with a rail loop connecting to the main line. The coal previously located on the coal pad has now been removed leaving a large area of hard standing.
- 6.5 The main area of the site to the south of the railway line is artificially elevated above the River Mersey following the creation of large lagoons related to the water-cooling infrastructure and ash depositions. To the west and south are relatively steep vegetated embankments leading down to the Mersey foreshore.

The Draft Allocation Policy

- 6.6 The UPSVLP seeks to introduce a new draft allocation which was not previously considered. The Plan indicates that land at the former Fiddlers Ferry Power Station is a mixed-use opportunity site that will be developed to create a sustainable, well-designed and distinctive place. The Plan anticipates that the Fiddlers Ferry site will deliver around 1,800 homes of which around 1,300 will be delivered in the plan period, and approximately 101ha of employment land.
- 6.7 The former power station site itself provides an opportunity for new employment uses and will make a significant contribution to meeting Warrington's future employment land needs. To the east of the former power station is an area of land proposed to be removed from the Green Belt for a minimum of 860 homes. Furthermore, a site to the west of the power station will be removed from the Green Belt to deliver a minimum of 900 homes whilst the remaining lagoons and their setting will be enhanced to provide an ecological and major new recreational resource.
- 6.8 It is intended that the new mixed-use development will be supported by new social infrastructure including a new primary school, a health facility, open space and recreational facilities and local shops.
- 6.9 The policy governing the delivery of the site (Policy MD3 – Fiddlers Ferry) sets out that the landowner will be required to prepare a comprehensive Development Framework for the Fiddlers Ferry development site. The Development Framework will need to accord with the site-specific requirements of this policy and wider Local Plan requirements and will be the subject to consultation with statutory consultees and the local community before finalising. Finally, it also states that the Development Framework will be agreed with the Council in advance of planning application being submitted and it will form a material consideration in the determination of planning applications at the site.

- 6.10 The UPSVLP anticipates that the site can commence delivery of dwellings from 2025/26 with 35 units being included in the first 5 years of the plan period with a further 350 units being developable from the northern parcel of the site in years 6-10. Delivery increases again in years 11-18 of the plan with 120 dpa being delivered annually across the northern and southern sites.

Explaining the Issue

- 6.11 At the outset, although the Consortium does not object in principle to the redevelopment of the brownfield site at the former Fiddlers Ferry Power station, they have considerable concerns in relation to the justification for the Green Belt release at Fiddlers Ferry and the assumptions in relation to the delivery of the site. The issues are set out in detail in the accompanying Fiddlers Ferry Technical Note and Issue 4 needs to be read in conjunction with this Note (Appendix 3). The key issues with the delivery assumptions on this site are set out below.

Site Constraints

- 6.12 The site has a substantial number of significant constraints which will have an impact on the developable area and the viability of the site. Not only does a proportion of the site contain the structures of a coal fired power station and associated paraphernalia and infrastructure, the site also contains:
- Highway constrains and access issues
 - Areas of flood risk
 - The site falls within the Impact Zone of the Mersey Estuary Site of Special Scientific Interest, Special Protection Area and Ramsar Sites
 - Confirmed presence of protected species including Bats, Badgers and Great Crested Newts
 - A series of archaeological and heritage constraints
 - Contamination issues on the surrounding land associated with the power station
 - Underground pipelines such as a major Ethylene pipeline and gas pipelines and a chemical works immediately to the west
 - Overhead high voltage power lines and associated pylons and underground cabling
- 6.13 Although in isolation, these constraints may individually be overcome, in combination they represent a significant deliverability issue for the site and have a profound impact on the viability of the site.

Green Belt

- 6.14 In terms of the release of land from the Green Belt surrounding the former power station, the Consortium are fervently of the opinion that the proposed release is unjustified in Green Belt terms and does not represent the most logical site for release.
- 6.15 In particular, the proposed allocation is located in a strategic Green Belt gap between the Warrington and Widnes urban area and the Green Belt parcels included in the allocation make a strong contribution towards this purpose. This area provides a vital strategic Green Belt gap which separates the two towns and prevents them from merging. In considering the overall harm to the Green Belt the Assessment notes:

“Purpose 2 – Development of the site would reduce the separation between the Warrington urban area, Widnes and Runcorn. In relation to the northern section of the site, the parcel of land to the east of Marsh Lane would continue to provide a degree of separation between the Warrington urban area and Widnes however this remaining gap would be the narrowest point between the towns”.

- 6.16 The Assessment therefore recognises that the Green Belt gap between Warrington and Widnes will be reduced to its narrowest point as a result of the removal of this Green Belt. The reduction in the gap would be significant, the extent of the Green Belt would be reduced from approximately 900m to 600m, and the development of the site would therefore make a major contribution to the coalescence of the two settlements contrary to the Framework [§138].

Density

- 6.17 The UPSVLP derives a developable capacity for the site by applying a minimum density of 35dph across the site. Whilst 35dph is achievable in some areas, it is considered that given the context to this site an average density of 35dph is not achievable. It is considered this density is likely to be acceptable given the proximity of a significant proportion of the developable area to the Green Belt boundary. One would envisage lower densities to be delivered to minimise the landscape impact on the Green Belt.
- 6.18 Coupled with that, the evidence provided by the Council to justify the proposed density is inappropriate as many of the sites are located in urban areas with a different development context and from applications dating back many years with no indication if they were delivered post securing of permission.
- 6.19 Furthermore, the average floorspace assumptions used in the Density Assessment prepared to underpin this allocation are far too low and do not appropriately take account of the Nationally Described Space Standards. Based on the house size being used by each of the housebuilders in the Consortium, the sizes used to justify the densities are underestimated and need to be increased to ensure compliance with the NDSS requirements. It can be concluded that the overall identified capacity of a minimum of 1,760 dwellings is therefore very unlikely to be achieved.

Sustainability Appraisal

- 6.20 Having considered the findings of the Appraisal of Urban Extension Options in Appendix G of the Sustainability Appraisal [SA], there are a number of significant issues with the Fiddlers Ferry site which raise questions over its suitability for allocation. In particular, the SA identifies that the site performs poorly in Accessibility terms in comparison to the other growth areas considered and is assessed as having a ‘minor negative’ effect. The SA states: *“Overall, development in this location is predicted to lead to minor negative effects as accessibility would not be ideal in terms of walkability or public transport further afield”.*
- 6.21 The accessibility of the site is therefore a significant issue and there does not appear to be any clear solution to addressing this matter. The site is poorly served by public transport and the assessment suggests that the provision of new services is likely to be unviable. It is difficult to see why any local bus service operators would choose to service the site. Given the sites isolated location and limited facilities proposed it will be heavily dependent on existing facilities elsewhere. It is also doubtful whether active travel infrastructure improvements would discourage use of the private car given the distance of the site from Central Warrington and other services such as a secondary school.

- 6.22 Given the amount of development proposed on the site and the distance from central Warrington this is a fundamental concern as this lack of accessibility may result in increased trips by private car and increases in congestion.
- 6.23 Whilst the SA suggests that impact on congestion could be mitigated, for the reasons identified in the Eddisons Transport Note which accompanies the Fiddlers Ferry note there is no certainty locally, as well as strategically, that the traffic likely to be generated by a redeveloped Fiddlers Ferry site can be suitably mitigated on the local and strategic road network. We therefore consider that the site is likely to have a ‘major negative’ effect in terms of accessibility.
- 6.24 The consortium considers that the assessment underplays the impact of the site and the scheme is likely to have a major negative effect upon air quality. In addition, it is not clear how these effects would reduce in the longer term as no further explanation is given to justify this statement. As the amount of development on the site would gradually increase over time the opposite would be expected.
- 6.25 We also note that the site performs particularly poorly in Biodiversity terms and has the highest effect of the sites assessed. It is subject to a number of biodiversity constraints and the SA notes:
- 6.26 “The northern part of the site is broadly brownfield but also contains mature trees and hedgerows with potential to be supporting protected species and several small areas of BAP priority habitats. This would be part of employment development though. Whilst development can likely avoid the loss of BAP habitats, it is likely to result in some loss to unprotected areas of trees, hedgerows and grasses which likely provide important undisturbed ecological connectivity between the BAP habitats on site, LWS to the south and the potential LWS to the east.
- 6.27 The housing element of the site falls within the Impact Zone for the Mersey Estuary SSSI with potential for development to have adverse effects from recreational pressures and pollution. Should ecological surveys reveal that the current areas for housing growth are low value, then the potential for biodiversity net gain exists.
- 6.28 At this stage, a precautionary approach is taken, and minor negative effects are predicted in relation to the nearby Mersey Estuary. In addition, the developable area itself falls within a local wildlife site and direct impacts on the function and connectivity of this habitat could occur. It is likely that much of the area would not involve built development but would involve publicly accessible open space. This could bring some disturbance to habitats, but by the same token, presents an opportunity to enhance the biodiversity value of the area. Cumulatively, a moderate negative effect is predicted overall”. The consortium strongly disagrees with this assessment.
- 6.29 The site does not perform as strongly as has been assessed in the SA and there are a number of issues which raise questions over the robustness of the SA. its suitability for allocation, in particular with regard to accessibility which is poor and given the size of the site is likely to result in significant use of the private car, leading to congestion and air quality concerns.
- 6.30 It is the consortiums view that the SA in relation to the assumptions made on Fiddlers Ferry is fundamentally flawed, results in an unsustainable approach to development, it is not sound and it is not legally compliant. The identification and delivery of a brownfield site which over exaggerates its impact in the SA should not surpass the allocation of other more sustainable greenfield releases where it is clearly not justified.

Local Plan Transport Modelling

- 6.31 The Transport Model Testing of the WUPSVLP 2021 dated August 2021 has included an assessment of the inclusion of the Fiddlers Ferry site within the modelling exercise.

- 6.32 For the reasons set out in the Eddisons Transport Note which accompanies this note (Annex 1), our view is that the results of that modelling on a network wide basis has not been presented in sufficient detail to establish any view as to how the network is likely operate with the Fiddlers Ferry site in the 2038 future assessment year.
- 6.33 The presentation of the modelling results do not allow any sort of comparison between the results of junction and network modelling from the previous Local Plan development strategy. This should be a critical thread of how the Local Plan strategy has evolved in recent years and should provide the evidence that the current strategy is more beneficial in transport terms than the previously proposed one, or at the very least acceptable in terms of, in this case, traffic impact on the local and strategic road network.
- 6.34 More fundamentally, there seems to have been no detailed consideration of the impact of the larger individual sites on the local highway network, including the Fiddlers Ferry site. It is clear from the August 2021 report, for example on the 'Analysis of Metric' information on Page 69, that the Fiddlers Ferry site will increase traffic flows along the A562.
- 6.35 The A562 is the main local highway route between Warrington and Widnes with a number of key junctions along its length, including the Fiddlers Ferry Gyrotory in Widnes to the west, the 'Lane End' junction and the A57 roundabout junction towards Warrington town centre, to the east.
- 6.36 There are comments in the August 2021 report that suggest that mitigation can be provided on the local highway network that would be able to be provided to accommodate the traffic that would be generated by a redevelopment of the Fiddlers Ferry site.
- 6.37 This is confirmed in Paragraphs 9.10 and 9.11 with increases in flow along the A562, the A557 (in Widnes) and to and from the M62 Junction 7.
- 6.38 However, the August 2021 document is silent on any discussion or agreement in the modelling with the neighbouring Halton Council and although 'engagement' with National Highways (NH) is mentioned, in paragraph 8.106, there is no confirmation of any agreement with NH on any part of the modelling process.
- 6.39 In this context the Framework (2021) states at para 27 that in order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency". Given the cross-boundary implications of Fiddlers Ferry on Halton and Warrington we would expect that this should be clearly set out and the relevant highways authority provides open transparent documentation of the assessment work and predicted impacts.
- 6.40 Given the strategic importance of these routes and the regional status of Junction 7 of the M62, there is absolutely no certainty whatsoever that the infrastructure required to accommodate the Fiddlers Ferry site can be achieved. For example, the 'Lane End' junction, which is the A562/Liverpool Road junction, is a signalised arrangement that is inevitably going to be impacted by any redevelopment at the Fiddlers Ferry site. This junction is very constrained on all sides by existing development and any physical mitigation to improve the capacity of this junction is highly likely to require the acquisition of third party land.
- 6.41 In addition, the gyrotory system at the A562/A557 (Fiddlers Ferry Junction) is a junction that serves as the approach route to the Mersey Gateway bridge to the south. As with the Lane End junction, this signalised intersection is constrained on all sides by existing development and

third party land. Once again, any physical mitigation to improve the capacity of this junction is highly likely to require the acquisition of third party land.

- 6.42 As such, it is clear that there is no certainty locally, as well as strategically, that the traffic likely to be generated by a redeveloped Fiddlers Ferry site can be suitably mitigated on the local and strategic road network. It is Eddisons view that in the context of the Framework [para 35] as the evidence supporting the Fiddlers Ferry site is not positively prepared, it is not justified as there is a lack of evidence provided in relation the mitigation of the impacts. It is not consistent with national policy as it fails to meet the requirements of para 104 of the Framework.
- 6.43 Due to the current lack of evidence currently available, it is clear that the Fiddlers Ferry draft allocation is contrary to national policy and at present there is no evidence that the site would not generate a severe residual cumulative impact on the road network, contrary to para 110 (bullet (d)) and 111 of the Framework.

Viability

- 6.44 On behalf of the Consortium, Roger Hannah were appointed to prepare a critique of the Council's viability evidence including an assessment of the viability of the Fiddlers Ferry site. The Roger Hannah Viability Consultation Response [VCR] is appended to this Issues Report at Appendix 4.
- 6.45 Although the Consortium has significant general concerns in relation to the Council's Local Plan Viability Assessment [LPVA], the VCR raises substantive issues in relation to the viability of the Fiddlers Ferry site.
- 6.46 The assessment notes the LPVA conclusion that Fiddlers Ferry is marginal based on an indicative scheme of 300 residential dwellings, just over 1.4m sq. ft of industrial development and c. 800 sq. ft of retail development. It also concludes that the proposed commercial development at the site is unviable on a stand-alone basis, generating a "significant deficit against the BLV".
- 6.47 Many of the appraisal assumptions for Fiddlers Ferry mirror the typology assumptions, except for the allowance of strategic infrastructure costs as set out in the IDP. The IDP costs on this basis for the whole site, Phase 1 and Phase 2 of the proposed Fiddlers Ferry development total £123,038,799. The LPVA only includes £90,174,299 against the proposed residential development at the site.
- 6.48 Roger Hannah has cross checked the included costs against the IDP costs and cannot verify the apportionment of the costs in the Fiddlers Ferry appraisal. It is not clear how the IDP costs are apportioned against the residential and commercial development in the context of the total cost of £123,038,799. It appears that there is no allowance in the LPVA Fiddlers Ferry appraisal for the commercial abnormal costs, which is a significant underestimation of cost based on the information in the IDP.
- 6.49 Based on Roger Hannah's review of the IDP, it is possible to apportion these costs against the appropriate phases and uses on site. This is because the IDP sets out costs for the whole site (off-site works), Phase 1 and Phase 2 accordingly, splitting out the proposed Phase 1 costs associated with the residential and commercial development. They would therefore recommend that the costs are apportioned in this way in any appraisal of site viability.
- 6.50 Given that Phase 1 of the residential development is due to come forward first to fund the demolition/remediation costs for the power station and loss-making employment development, we believe it is prudent to appraise the viability of the site on this basis. They have therefore

assumed that the proposed residential development associated with Phase 1 would come forward in three phases as follows:

- Phase 1 - residential development of 300 units
- Phase 2 - residential development of 300 units
- Phase 3 - residential development of 260 units

6.51 This reflects the planned split of 860 units across Phase 1 as set out in the IDP. The commercial development is likely to follow this, on the basis that the land receipts associated with the residential development can be used to fund the demolition/remediation of the power station itself. Phase 2 of the development would then follow this, assuming it is deliverable.

6.52 Roger Hannah have appraised the residential phases within Phase 1 on an individual basis, with the results as follows:

Figure 6.1 Roger Hannah Fiddlers Ferry Phase 1 Residential Appraisals

Phase	Residual Land Value	Benchmark Land Value	Surplus/Deficit
Phase 1	-£5,804,160	£3,214,285	-£9,018,445
Phase 2	-£5,804,160	£3,214,285	-£9,018,445
Phase 3	-£5,033,250	£2,785,715	-£7,818,965

Figure 24: FF Phase 1 Residential Appraisal Results

Source: Roger Hannah VCR (November 2021)

6.53 These appraisals are undertaken in isolation to assess the residual land value associated with the residential development on a standalone basis. This is because the land receipts associated with the residential development on the adjoining land to the power station are required to fund the £37,513,699 associated with the demolition/remediation of this site and the £32,100,000 of abnormal costs associated with the commercial development.

6.54 The residential phases do not produce a positive land value and are therefore wholly unviable. Not only does this not reach the required BLV in viability terms to justify policy compliant residential development on a standalone basis, but it does not generate any of the surplus required to fund the demolition/remediation of the power station site and the associated commercial development. This also demonstrates that the residential development associated with Phase 2 would also be unviable, as our appraisals do not account for any of the additional costs associated with the bridge, network rail ransom and country park, which total £26,750,000.

6.55 The residential development therefore cannot cross subsidise the demolition/remediation required to the power station or the loss-making commercial development. The residential development is also incapable of meeting planning policy and affordable housing requirements on a stand-alone basis because the residual land value of the phases is negative and therefore falls well below the required BLV for the site. In light of these findings, Roger Hannah therefore conclude that the Fiddlers Ferry site is wholly unviable.

6.56 The Roger Hannah assessment demonstrates that the viability of the Fiddlers Ferry site is overstated and that the site is wholly unviable rather than marginal. As such, it is neither deliverable nor developable and its inclusion as a mixed-use allocation is therefore contrary to the Framework [§68].

Delivery Trajectory

- 6.57 As set out earlier, the UPSVLP anticipates that the site will commence delivery in 2025/26 which based on the necessity for the Plan to be adopted, the Development Framework to be agreed, progress through the planning process and commence the demolition and remediation of the site prior to any unit being delivered on the site, this trajectory is fundamentally wrong and will not be delivered.
- 6.58 The Council has not provided any substantial justification to demonstrate this timescale for delivery is realistic or achievable and it is considered that the Council has not grounded their assumptions in reality.
- 6.59 In the absence of any real justification and evidence presented by the Council for the Fiddlers Ferry site, Warrington Council should pay heed to Lichfields Research Insight entitled Start to Finish 2 (2020) which sets out the factors which affect the build out rates of large scale housing sites based on empirical evidence from developments nationally.
- 6.60 The research sets out some very pertinent conclusions in relation to the time it takes large sites to come forward and commence delivering homes. For example:
- It takes on average 7 years from validation of first application to completion of first dwelling for sites with capacity of 1,500-1,999 dwellings;
 - It takes on average 3 years from the receipt of an outline decision notice to the completion of first dwelling completion on sites of 500+ dwellings;
 - Greenfield sites deliver on average 34% higher annual build-out rate on greenfield sites compared with brownfield sites;
 - In terms of delivery rates for sites between 1,500 and 1,999 dwellings, the mean annual delivery is 120 dwellings per annum.

Timescales

- 6.61 As demonstrated above and in the accompanying more detailed Technical Note (Appendix 3), the Council has completely misunderstood the complexity surrounding the delivery of a site such as the draft allocation at Fiddlers Ferry. The site will not delivery units within the first 5 years of the plan, in fact, it is high lightly that no dwellings will be delivered until the back end of the plan period. There are many technical reasons which will slow down the progress of the site and a significant proportion of work is required in advance of the Development Framework being agreed. This is not simply a case of the Council and the landowner agreeing a masterplan for the site. There will be a requirement for input from a significant number of statutory consultees who will need to agree to the masterplan and development proposals such as the local highway authority, Highways England, the local Education Authority, the LLFA, UU, the EA to mention but a few.
- 6.62 With this in mind, the Consortium is of the opinion that the following timeline is a best-case scenario of the time it will take for the development to come forward.
- Adoption of the Local Plan – not likely to occur until at least **2023**.
 - Commencement of preparation of Development Framework upon adoption of the Plan. It is unlikely that this will progress in advance significantly in advance of adoption due to the uncertainty of the Plan being adopted and Council finite staff resources prioritising the Local Plan over the Development Framework. Not only that but significant levels of technical input required for such a complex site and the best-case scenario for adoption would be **end 2025**. This would represent a best-case scenario and there are many similar

examples of where the production and agreement of a Development Framework for a complex site like this has taken significantly longer.

- Planning Application(s) to follow in **2026** in accordance with the Development Framework. Again, we are assuming a best-case scenario as the preparation of an Environmental Statement is highly likely to be required for any application on this site.
- First completion 7 years post submission of the planning application. This accounts for extensive negotiation of the planning application with the Council including engagement with public consultees, signing of legal agreements, preparation and submission of reserved matters applications, discharging planning conditions, negotiations with chosen housebuilders and developers to progress the site, remediating the site, putting necessary infrastructure including access into the site before finally completing dwellings. – Based on the complexity of this site, we anticipate that first completion on the site will not be expected before monitoring year **2033/2034**.

6.63 Although in a real-world scenario based on our past experience, the first completion is unlikely to be achieved before 2033/34. Given the complexity of the site, it is imperative that the Council does not seek to exaggerate the supply which can be achieved from this incredibly complex site simply to negate the need for other allocations to come forward. There are a multitude of examples from the across the North West for the delivery of strategic sites which take considerable time to commence delivery.

6.64 To put our suggested timescales for delivery in context, and whilst acknowledging that each site needs to be considered on its own merits, the adjoining authority of St Helens' Local Plan is currently being examined. Within the Plan there is a large scale draft allocation known as Bold Forest Garden Suburb. This is a largely unconstrained green field site and there is no requirement for substantive remediation to take place in advance of the development of the site. However, there is a requirement for the preparation of a Development Framework/Masterplan to be agreed in advance of any permission being approved on the site. To account for this as well as planning applications coming forward, the Council has assumed that no units will be completed on the site in the first 7 years of the Plan. The Inspectors examining the Plan have not questioned these timescales.

Recommended Action

6.65 An expressed intention of the Framework is to boost the supply of housing being delivered in the country in an effort to address the housing crisis. With this in mind, the Consortium is firmly of the opinion that the Warrington Council has exaggerated the claimed supply trajectory from the Fiddlers Ferry site and has not grounded their assumptions in reality. Little regard has been paid to the significant technical constraints associated with this site and the implications that they will have on timescales, viability and delivery of dwellings on the site.

6.66 The Consortium considers that if the site comes forward, it will not do so before 2033/34 based on the evidence and justification we have provided. This would result in a shortfall in the Council's proposed trajectory of 595 units based on the assumptions they have used including the commencement of the delivery of units in years 2025/26. The Consortium is fervently of the opinion that the Council's delivery assumptions are fundamentally wrong and are completely unrealistic and unachievable. No substantive evidence has been provided to justify their position and in any regard given the requirement to prepare and adopt a Development Framework for a complex site in advance of the submission of a planning application will cause significant delays in progressing the site towards a permission.

6.67 Given the significant number and complexity of the issues raised in relation to the developability of this site, it is consider that the Council's delivery trajectory is completely at odds with the

reality of delivering complex strategic sites and the Council need to identify alternative sites to plug the gap in the supply trajectory. Not only that but the Consortium consider that the Council has not followed a logical approach in terms of identifying the most appropriate sites for release from the Green Belt and the loss of this proposed allocation would result in the erosion of the strategic gap between Warrington and Widnes.

The Consequences for the Plan's Soundness Without Modification

- 6.68 The evidence which justifies the Fiddlers Ferry allocation is technically flawed and not legally sound. There are some significant omissions in the evidence, and it is the consortiums view that they have deliberately over exaggerated the sustainability merits of the site and hidden its technical failings to avoid allocating more suitable and sustainable greenfield releases.
- 6.69 The Consortium is strongly of the opinion that identifying a site like Fiddlers Ferry for housing which has so many delivery constraints will result in the UPSVLP being found unsound at Examination or at the very least it will be subject to substantive changes at the Examination stage which will delay the formal adoption of the Plan. Furthermore, there is a risk in the event that significant additional Green Belt allocations were required that Warrington's Full Council would refuse to endorse a plan with additional allocations and the Examination process would have been a waste of time and valuable Council resources.

7.0 **Issue 5: Viability: Delivery of Affordable Housing and Infrastructure Delivery Issues**

Explaining the Issue

Affordable Housing Delivery

- 7.1 The Framework sets out that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. The Framework also states that to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged [Annex 2].
- 7.2 There is also increased emphasis in national planning policy on the importance of considering viability upfront in the planning process, and that the role for viability assessment is primarily at the plan making stage. The Practice Guide states that policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage¹².
- 7.3 Cushman and Wakefield (on behalf of the Council) has produced a Local Plan Viability Assessment (August 2021) [LPVA] to inform the preparation of the UPSVLP. The Consortium has reviewed the content and conclusions made within the LPVA. Based on its analysis, the Consortium has significant concerns in relation to the viability of sites, and the subsequent ability of the emerging Local Plan to deliver the required number of affordable dwellings. A separate Technical Note on viability has been prepared by Roger Hannah (Viability Consultation Response) (November 2021) which sets out in detail the Consortium's reservations regarding viability and forms Appendix 4 of this Issues Paper.
- 7.4 The LPVA sets out the general viability assumptions for assumed development typologies that should represent site supply across the plan area, as well as the strategic allocated sites. The LPVA concludes that most of the assumed typologies in lower value locations are unviable or marginal based on policy compliant level of affordable housing and other policy requirements. It also concludes that affordable housing is not deliverable in the town centre, and demonstrates that even development with 0% affordable housing is marginal/undeliverable due to the costs of apartment development and the achievable sales values. The Consortium agrees with these conclusions, but considers that the viability position may be even worse than stated.
- 7.5 The Consortium has specifically reviewed the assumptions made in regard to the development typologies and the conclusions of the report, with detailed analysis of the typology testing set out in the Viability Assessment Consultation Response. The Response identifies significant issues with the viability position across the borough for brownfield site development, highlighting that the overall viability is likely to be worse than as assessed in the LPVA viability testing.
- 7.6 A review of the appraisal assumptions shows that viability is likely to be overstated for the following reasons:
- 1 GDV has been overestimated in the Town Centre and Inner Warrington typologies;
 - 2 The constructions costs in respect of site abnormal/extra over costs and energy requirements in particular, are underestimated across all typologies; and,

¹² PPG Paragraph: 002 Reference ID: 10-002-20190509

3 Developer's profit is set at a marginal level on a blended basis across the private and affordable housing.

- 7.7 The LPVA then goes on to sensitivity test the base results, concluding that the viability can be improved, and that reasonable weight can be attributed to the sensitivity testing. However, the sensitivity analysis only makes positive changes to the appraisal inputs, which in turn generates more positive results. The Consortium considers the sensitivity assumptions to be unrealistic as they are based on reducing costs assumptions which contradicts forecast and market data. It is therefore considered that the sensitivity testing is not plausible and the Consortium disagrees with the LPVA conclusion that "*reasonable weight can be attributed to the sensitivity analyses*" (para. 9.3).
- 7.8 In order to place the Consortium's significant viability concerns into context, the issues identified with the viability of the claimed supply should be viewed against the Council's identified need for affordable housing and the anticipated distribution of the claimed supply. The Warrington Local Housing Needs Assessment (August 2021) [LHNA] identifies the affordable housing need within the Borough, with a need to provide 423 dwellings per annum, which equates to 7,614 dwellings over the plan period. This represents a significant proportion (51.8%) of the Council's overall housing requirement identified in the UPSVLP (14,688 dwellings).
- 7.9 The UPSVLP does acknowledge that evidence on housing need makes clear that there is a significant shortfall of affordable homes within the Borough (para. 2.1.38). However, it is not clear how the Council expects to sufficiently address this shortfall and meet the affordable housing need when a significant proportion of the supply is identified in Warrington Town Centre which is considered unviable, and in areas of Inner Warrington which is stated as having a '*lower level of viability*' (UPSVLP para. 4.1.36).
- 7.10 The Warrington Town Centre Masterplan document indicates that 8,000 new homes will be provided within the Town Centre and Waterfront by 2040, whilst the UPSVLP identifies an affordable housing requirement over the plan period of 20% on sites within Inner Warrington (inclusive of the Town Centre) (Policy DEV2 – Meeting Housing Needs). The LPVA and the Consortium's independent analysis of the viability position of Town Centre locations, indicates that affordable housing in the Town Centre is not viable under any circumstances. This casts significant doubt over the ability of a significant proportion of the Council's claimed supply to deliver any affordable housing whatsoever as part of developer contributions.
- 7.11 A number of the Consortium members have tried to deliver schemes in Warrington Town Centre in recent years and have highlighted a number of key issues and considerations which are likely to affect future development proposals too. In particular, car parking is always a key issue in the determination of planning applications and there is still emphasis on the provision of car parking in line with the Council's Standards for Parking in New Development SPD (2015). This has considerable implications on net developable areas of sites and in particular results in reduced densities being achievable. Not only that, the provision of underground car parking associated with apartments adds considerably to the cost of construction and from experience, the viability of such developments in Warrington Town Centre are marginal at best and in many cases do not stack up without some form of public sector intervention.
- 7.12 The Consortium has also undertaken a detailed analysis of the viability position of the Fiddler's Ferry site (as set out in Issue 4). The UPSVLP sets out that the site will deliver 1,300 dwellings in the plan period with 30% affordable housing. However, the assessment carried out by Roger Hannah demonstrates that the viability of the site is overstated and that the site is unviable rather than marginal. As such, it is neither deliverable nor developable and its inclusion as a

mixed-use allocation is therefore contrary to the Framework [§68]. It is considered that no affordable housing will be delivered on this site.

7.13 The Consortium therefore has significant concerns that a sizeable proportion of the claimed supply does not stack up from a viability perspective and the plan will fail to deliver its vision and objectives. It is clear that the emerging Local Plan in its current form will not deliver on the required quantum of affordable housing across the Borough without significant alternative public sector funding being secured, or identifying a number of strategic Green Belt allocations with the ability of delivering reasonable proportions of affordable dwellings.

7.14 In addition to this, and although not strictly viability related, it is worth noting that 10% of the Council's annual supply of housing will be made up of windfalls, with a small sites allowance of 81dpa. This represents a sizeable proportion of the supply, but as set out in the Framework [§64], the provision of affordable housing should not be sought for residential developments that are not major developments (under 10 homes). It is therefore likely that this reliance on windfalls will further compound the issue of affordable housing delivery over the plan period.

Infrastructure Delivery Issues

7.15 The Practice Guidance states that the preparation of a Development Plan *'is an opportunity for the strategic policy-making authority to set out a positive vision for the area, but the plan should also be realistic about what can be achieved and when. This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought forward'*¹³.

7.16 Based on a review of the UPSVLP and the Council's supporting evidence base, it appears that the Council expect a significant proportion of the required social and physical infrastructure to support new development to come forward through developer contributions. This is despite the fact that the Council's own evidence notes that there are likely to be significant viability challenges and implications for sites in the Town Centre, Inner Warrington and lower value locations across the Borough.

7.17 Emerging Policy INF5 (Delivering Infrastructure) sets out that developments will be required to provide, or contribute towards, suitable mitigation to make the development acceptable in planning terms. However, there are significant issues associated with the ad-hoc nature of securing contributions from so many developments towards meeting social infrastructure requirements. This makes the approach a highly unreliable funding stream.

7.18 In instances where viability is marginal, the only available mechanism to improve viability is through the reduction of provision of affordable housing or social and physical infrastructure contributions. It is questionable if development in these locations has sufficient sales values that could sustain delivering the social infrastructure required as well as meeting affordable housing needs.

7.19 As previously stated, the Council's Town Centre Masterplan document indicates that 8,000 new homes will be provided within the Town Centre and Waterfront by 2040. However, despite the document comprising 67 pages, there is no reference to key infrastructure provision such as education and health. The delivery of adequate education and health services are vital to meet the additional needs generated through the delivery of 8,000 additional dwellings. Not only that, the delivery of up to 8,000 dwellings in this area will put considerable pressure on the existing services and infrastructure and no information has been provided on how sufficient electricity or sewerage infrastructure can be delivered or funded to meet increased demand.

¹³ Practice Guidance ID-Ref: 61-059-20190315

- 7.20 In addition to this, the Council has also prepared an Infrastructure Delivery Plan [IDP] (September 2021) to support the UPSVLP, which aims to identify and prioritise infrastructure provision as part of an integrated approach to planning and infrastructure development. The IDP includes an Infrastructure Delivery Schedule at Appendix 1 which details the projects required to support the delivery of the emerging Local Plan. However, based on an initial review of the schedule, it is clear that a significant proportion of projects do not have confirmed funding and there are large funding gaps throughout the schedule. The schedule therefore provides limited certainty of delivery of the infrastructure required to meet needs, particularly on brownfield sites which can come forward in an ad-hoc manner.
- 7.21 The Consortium is therefore very concerned that the required infrastructure to support new developments may not be deliverable, particularly when viability has been identified as a significant issue in the Town Centre and in low value locations across the Borough.

Recommended Action

- 7.22 Planning guidance is clear that policies need to be viable and deliverable, and it is the role of plan making viability assessments to assist in identifying viable and deliverable forms of development.
- 7.23 The UPSVLP identifies a significant proportion of housing supply on sites within the urban area, specifically within Warrington Town Centre on previously developed brownfield land (the Warrington Town Centre Masterplan sets out a target to deliver 8,000 homes over the plan period). The Consortium has concerns that a significant proportion of the Council's claimed supply is unviable, particularly in the Town Centre and other low value locations in the Borough.
- 7.24 Given that the LPVA base testing concludes that most of the development typologies cannot deliver a policy compliant level of affordable housing whilst meeting other policy requirements, more comprehensive typology testing should be undertaken. This would assist plan makers with the identification of viable development types in order to ensure that affordable housing needs are met. Based on the Consortium's analysis, it is considered that the Council should also identify a greater quantum of greenfield sites in higher value areas. Based on the Consortium's independent viability testing, these sites are more likely to be viable and able to deliver the requisite quantum of affordable housing.
- 7.25 Roger Hannah has specifically assessed this typology, providing an example of a greenfield housing site typology of 150 units in a Suburb Mid Value location (Viability Assessment Consultation Response; Figure 14). The appraisal demonstrates that additional typology testing needs to be undertaken for housing schemes in the higher value areas because this type of development can deliver policy compliance in terms of affordable housing, Section 106 contributions, and additional policy costs. Additional testing in this regard would enable plan makers to identify where development, and in what form, should take place to meet policy requirements and achieve affordable housing delivery.
- 7.26 Furthermore, given the emphasis on the redevelopment of sites within the urban area and Warrington Town Centre (with the prime intention of reducing the quantum of Green Belt losses), it will be very difficult to identify and secure sufficient sites to deliver required infrastructure as part of this current plan. This will create many other problems in the long term including social issues and lack of service provision.
- 7.27 Identifying a greater quantum of greenfield sites in higher value areas will also help to ensure that the required social and physical infrastructure provision can be delivered, and ensure the needs of residents in new developments are met.

The Consequences for the Plan's Soundness Without Modification

- 7.28 No regard has been paid to the viability of delivering a significant quantum of housing in Warrington Town Centre and the impact this will have on the delivery of much needed affordable housing and social infrastructure such as schools and medical centres to cater for future resident's needs. The consequences of failing to provide the required levels of social and physical infrastructure in a planned and proactive fashion could result in the creation of many unsustainable and substandard communities which lack the basic social infrastructure required to thrive. Furthermore, the ever-growing affordable housing list will continue to spiral which has a direct impact on families across the Borough.
- 7.29 The Consortium is strongly of the opinion that the failure to identify a sufficient level of housing allocations in the Plan, which have been tested as being viable, will result in the UPSVLP being found unsound at Examination. At the very least it will be subject to substantive changes at the Examination stage which will delay the formal adoption of the Plan.

8.0 **Issue 6: Failure to Identify Safeguarded Land**

Explaining the Issue

- 8.1 The Framework (§143) is very clear that when defining Green Belt boundaries, plans should, where necessary, identify Safeguarded Land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The purpose of safeguarding land is to *'be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period'*.
- 8.2 Furthermore, the Framework is clear that strategic policies should look ahead over a minimum 15-year period from adoption to respond to long-term requirements and opportunities. It continues by stating that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy *'policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescales for delivery'* (§22).
- 8.3 Identification of Safeguarded sites across an authority provides a useful mechanism for future Local Plan Reviews to be undertaken in a timely and efficient manner should supply from existing sites fail to materialise as envisaged by the Plan. The identification of appropriate levels of Safeguarded Land can act as a failsafe for a plan and is a reasonable way of future proofing supply. It also places more permanence on the land retained within the Green Belt as there is unlikely to be required to go through the Green Belt Review process at the next Local Plan Review if sufficient Safeguarded sites are identified.
- 8.4 The Warrington Local Plan includes a section in the Plan entitled 'Supply beyond the Plan Period'. Within this section of the Plan, the Council recognises that consideration must be given to housing land supply beyond the Plan period. It continues to state that given the proposed major urban extensions being promoted as part of the Plan's strategy, the Council has considered an overall timescale of 30 years.
- 8.5 However, in claiming to have identified sufficient land to meet an overall timescale of 30 years, the Council has manipulated the housing requirement and reduced it beyond the Plan period from 815dpa to 605dpa. The rationale for the reduction is based on a lower annual average household growth from 2028-2038 derived from the 2014 based projections and has applied no affordability uplift as *'the Council considers that by the end of the Plan period, house price affordability will no longer be a significant issue in Warrington'* [Local Plan §4.1.27].
- 8.6 The Consortium strongly refutes this approach and considers it is fundamentally flawed. There is no logical reason why the Council would select the arbitrary period 2028-2038 to project forward beyond the Plan period and as a minimum should plan to deliver the annual minimum requirement of 816.
- 8.7 Not only that, within the plan period itself, the Council is planning to deliver the minimum number of houses derived using the Standard Method with no additional uplift being applied to account for a variety of factors as set out in Issue 1 and the Consortium does not believe there is any evidence to suggest that house price affordability will not be an issue at the end of the Plan period. The Council's Objectives in the Plan do not seek to positively address existing affordability issues being experienced in Warrington and as such it is perverse to conclude that affordability will not continue to be an issue.

- 8.8 Table 2 of the UPSVLP sets out the development needs beyond the Plan Period. It seeks to project forward an annual household growth annual household growth to 2050 and identify sources of supply to meet the requirement.

Figure 8.1 Warrington Local Plan - Table 2 Development Needs Beyond the Plan Period

Indicative Housing Requirement 2038 to 2050	
Annual household growth 2028-38*	605
Projected forward 2039/40 to 2050/51 (12 years)	7,260
Number of homes required 2039/40 to 2050/51 **	7,406
Indicative Housing Supply 2038 to 2050	
Additional supply within Plan from flexibility	1,948
Garden Suburb delivery post 2038	1,800
Fiddlers Ferry delivery post 2038	450
Waterfront delivery post 2038	265
Assumed brownfield development	3,024
Total indicative supply	7,487

- 8.9 Aside from the concerns expressed earlier in relation to rationale behind the proposed Indicative Housing Requirement (2038-2050), the Consortium also has significant concerns about elements of the housing supply. We appreciate that predicting housing delivery over the coming years is challenging and it is even more challenging to predict what may be delivered post 2038. That said, the approach being taken in the Plan is flawed for the following reasons:

- The Council anticipate that the full flexibility allowance which is incorporated within the supply for the Plan period will be delivered in the 12 years beyond the current plan period. However, this is a flawed approach and doesn't fully appreciate that reasoning why the flexibility is being incorporated in the first instance. The flexibility has been incorporated to ensure a continuous supply of land if sites do not come forward as envisaged and the Council clearly envisage that this is a strong possibility. A site may not come forward as envisaged for a host of reasons and there is no guarantee that the original reason would be overcome in the 12 years beyond the plan period.

As such, **the flexibility element of the indicative housing supply 2038 to 2050 should be removed as a reasonable source of supply as there is every likelihood that it will already have been delivered in the Plan period** and there is no guarantee that the sites the flexibility allowance replaced will be delivered in the later period either.

- As detailed in Issue 4, the Consortium has significant concerns in relation to the proportion of units envisaged to be delivered from the Fiddlers Ferry site. There are a host of reasons why this site will not come forward and even if it does, it will only contribute a small number of units towards the end of the Plan period and significant public investment will be required to remediate and unlock the site. In this context, the Consortium is of the opinion that the delivery trajectory for this site will slip considerably but given the uncertainty, the number of units as set out in Table 2 of the Warrington Local Plan should not be increased.
- The Council has anticipated that an additional 3,024 units (252dpa) will be derived from brownfield sites in the period 2038-2050. This is despite the Plan recognising in a number of places that Warrington is now *'running out of such land and supply is dwindling'* [§2.1.12] and *'the availability of brownfield development sites is likely to decrease over time'* [§4.1.30]. Despite these admissions and recognitions of the issues, the Plan pays no heed to it and seeks to arbitrarily include a significant allowance from brownfield sites beyond the plan period (40% of the supply). It is likely that some units will be delivered on

brownfield sites beyond the plan period but the Council has unjustifiably exaggerated the supply from this source.

Furthermore, the Council's only justification for such a high level of supply is that '*given likely advances in technology and development trends over the next 18 years, the Council considers it is likely there will still be additional brownfield development sites within the existing urban area* [§4.1.30]. The Consortium does not understand what the Council means by likely advances in technology and consider that it represents a wholly inadequate justification for the inclusion of the proposed levels of supply from this source.

The Council has included a windfall allowance within their supply in the plan period of 81 units per year. Although the Consortium considers that this figure is too high, we are of the opinion that the assumed brownfield development allowance for the period 2038-2050 should be identical to and not exceeding the windfall allowance. Therefore, **at least 2,052 units need to be removed from the indicative supply set out in Table 2 of the Plan**. This level of reduction may need to increase if the Inspector agrees with the Consortium that the windfall allowance in the Plan is too high.

- 8.10 The Consortium consider that Table 2 needs to be amended and updated as set out in Table 8.1. This clearly demonstrates that there is a significant shortfall in the supply of land to meet development needs to 2050 and the Consortium strongly advise the Council and the Inspector to identify sufficient amounts of safeguarded land to deliver at least 6,499 dwellings or 8,693 dwellings should the Inspector agree with the Consortium that a higher housing requirement is warranted.

Table 8.1 Consortium's Position - Development Needs beyond the Plan Period

Indicative Housing Requirement 2038 to 2050	LHN Position	Consortium's Housing Requirement
Annual Requirement	816	1,015
Projected forward 2039/40 to 2050/51 (12 years)	9,792	12,180
Indicative Housing Supply 2038 to 2050		
Additional supply within Plan from flexibility	0	0
Garden Suburb delivery post 2038	1,800	1,800
Fiddlers Ferry delivery post 2038	450	450
Waterfront delivery post 2038	265	265
Assumed brownfield development	972	972
Total indicative supply	3,487	3,487
Total Surplus	6,499	8,693

- 8.11 Although the Consortium recognises there is no set way of identifying the proportion of land which should be safeguarded in a Plan to ensure the Green Belt boundaries endure beyond the Plan period, it is considered that the approach currently being taken by Warrington is unjustified and is likely to result in a requirement for another Green Belt Review at the end of the Plan period. This Plan make no allowance for any Safeguarded Land and the Consortium is of the opinion that allocations delivering units beyond the plan period does not represent a true safeguarded site. The approach being taken by Warrington differs from that of its neighbouring authorities who do identify safeguarded land as well as large allocations which are delivering units beyond the Plan period (i.e. Cheshire East, St Helens and Halton).

- 8.12 The Plan places a huge reliance on the delivery of the South East Warrington Urban Extension and Fiddlers Ferry power station site within the plan period to 2038 (25% of the new homes required). In the event of any significant issues with the delivery of either of these sites, a particular concern for the Fiddlers Ferry site (Issue 4), the Council has got no safety net to ensure a sufficient supply of housing land.
- 8.13 The Local Plan is effectively seeking to claim that some of the larger allocations which will deliver units beyond the plan period are effectively Safeguarded Land but this does not represent a robust or justified approach. The purpose of safeguarding land is to ensure the long-term permanence of Green Belt boundaries beyond the plan period and to offer an alternative source of land in the event of there being an insufficient supply of available housing sites. Within the Plan, this fallback position has not been included and further undermines the soundness of the Plan.
- 8.14 The identification of a number of safeguarded sites of varying sizes across the district would offer the potential to quickly address shortfalls in the supply of units through a Local Plan Review. In most cases, smaller sites with the capacity to deliver up to 500 units would come forward sooner and could contribute towards completions in the first 5 years and a policy trigger should be included within the Plan which allows Safeguarded Land to come forward when housing land supply issues are experienced (i.e. not being able to demonstrate a deliverable 5 year supply).

Recommended Action

- 8.15 The Consortium are strongly of the opinion that the current version of the Warrington Local Plan does not meet the requirements of the Framework as it does not identify sufficient proportions of land to meet needs post 2038 or identify safeguarded land which could act as a failsafe in the event that one of the key strategic allocations does not come forward as envisaged. Despite this Plan undertaking a Green Belt Review, no sites have been identified as safeguarded land to meet needs beyond the Plan period. Identifying safeguarded land does not allocate it for development and the same level of protection is afforded to safeguarded land as Green Belt provided the Council's Local Plan is delivering the homes and employment land that it envisaged.
- 8.16 The land identified in the Plan to meet needs beyond the plan period is predominantly from an increased proportion of unidentified windfall sites and from strategic allocations delivering dwelling beyond the Plan period. There is no certainty that the unidentified windfall sites will come forward as envisaged and required '*technological advances*' to facilitate their delivery and there is considerable concern with regard to the delivery of some of the strategic sites delivering units beyond the Plan period.
- 8.17 As set out in Table 8.1, the Consortium is of the opinion that sufficient land is required to meet the future needs for at least 6,499 dwellings or 8,693 dwellings should the Inspector agree with the Consortium that a higher housing requirement is warranted. This land should be identified now and safeguarded to meet the needs beyond the Plan period and ensure that the Green Belt boundaries endure beyond the Plan period too. The Consortium is of the opinion that the land to be identified as Safeguarded should be varied in size and be capable of coming forward in the short terms should the need arise at any point in the plan period. This would allow any future Local Plan Review to allocate the safeguarded sites for development and ensure they are capable of delivering units in the first 5 years post adoption of the Review.
- 8.18 In the Consortium's opinion, the selection of the most appropriate sites to be safeguarded should be identified in a robust and consistent Green Belt Review and based on a robust Site

Selection methodology which considers matters including the sustainability, accessibility, deliverability and viability of the sites.

The Consequences for the Plan's Soundness Without Modification

- 8.19 Without the identification of sufficient proportions of Safeguarded Land within this Plan, there is a strong possibility that the Plan will be found unsound at examination as it is not consistent with national policy. Furthermore, the identification of Safeguarded Land within the Plan should be viewed as a positive and represents a positive approach to planning. The identification of safeguarded land will futureproof the Plan and ensure that any issues associated with lack of supply of supply not coming forward as quickly as expected can be addressed quickly through a Local Plan Review rather than having to formally commence a new Green Belt Review and site selection exercise which based on past experience can be a slow and contentious process.

9.0 Conclusions

- 9.1 The Report has been produced on behalf of a Consortium of housebuilders and developers to articulate and substantiate the key issues with the recently released UPSVLP. The members of the Consortium are amongst the most active in the housebuilding industry across the North West of England and deliver high quality and homes and sustainable communities for families to live. The Consortium members also provide a high proportion of affordable homes on their sites, helping aspirational households to get onto the property ladder, diversifying the housing market offer and creating direct and indirect employment for local people during construction.
- 9.2 With this in mind, the Consortium has been frustrated by the lengthy delay and uncertainty that has arisen in Warrington in recent years due to the planning policy vacuum caused by the significant delay to the preparation of a new Warrington Local Plan and the limited growth opportunities therein. Not only that, a number of developers and housebuilders committed considerable resources promoting draft allocations and assisting the Council in providing sufficient information to demonstrate their deliverability only for the Council to unjustifiably remove their draft allocation status in the latest iteration of the plan.
- 9.3 One of the key issues being experienced across Mid-Mersey and particularly in the Warrington housing market is the lack of suitable and deliverable sites available, particularly those that would be suitable for family homes. The uncertainty resulting from endless delays to the emerging Warrington Local Plan and the absence of up-to-date plans has created a situation whereby Warrington has persistently failed the Housing Delivery Test and cannot demonstrate an adequate 5-year supply of housing land.
- 9.4 It is important to emphasise that the Consortium does not want the Warrington Local Plan to fail. Instead, the Consortium wants to see an up to date, progressive and ambitious Local Plan adopted as soon as practicably possible. A lot of the issues raised within this Report and the accompanying Technical Notes go to the soundness of the plan and need immediate rectification if the plan is to succeed.
- 9.5 With this in mind, this report has been written to explain to an Inspector the key issues the Consortium has with the UPSVLP and the areas of focus which need to be amended if a sound and deliverable plan that meets the housing and growth needs of residents to 2038 and beyond can be found sound at Examination. We have sought to offer a series of practical solutions to the problems, not just highlight the problems. In summary, the key issues with the UPSVLP are:
- 1 **Housing Requirement** – the UPSVLP seeks to pursue the minimum housing requirement derived from the Standard Method but pays little regard to the need to boost the supply of housing, tackling the affordability issues, aligning the housing requirement with the Plan’s economic aspirations or seeking to boost the supply of affordable housing to meet existing needs. Detailed analysis is set out in the accompanying Technical Paper including reasoned justification for boosting to the housing requirement to 1,015dpa over the Plan period.
 - 2 **Plan Period** - Inconsistencies in the UPSVLP’s policies and its own evidence base: these are manifold, but one of the most relevant is the fact that the Council’s own housing evidence (the 2021 LHNAU) and the UPSVLP have different timeframes. The Local Plan is working to an 18-year timeframe (2021/22 to 2038/39), and therefore should arguably be running from 2021 to 2039, not 2038. In contrast, GL Hearn’s housing need assessment is over a 17-year timeframe, running from 2021 to 2038. This error is indicative of the extent to which the Local Plan and its own evidence base are fundamentally flawed, unjustified and unsound as a result.

- 3 **Staggered Housing Requirement** – the Council has unjustifiably and arbitrarily sought to reduce their housing requirement in the first 5 years. There is no rationale reason for reducing the requirement in the first 5 years aside from arbitrarily seeking to manipulate the figures to be able to demonstrate a 5-year supply upon adoption. The Council seeks to justify the approach due to the number of strategic sites taking longer to deliver units. However, the Council is also advocating that 535 dwellings will be delivered from these sites in the first 5 years. Not only that, there are considerable housing issues in Warrington which will be further exacerbated by the Council’s approach which is the antithesis of positive plan preparation.
- 4 **Housing Land Supply Concerns** – the members of the Consortium are very experienced housebuilders and developers who understand the complexity of the housing market and understand the timescales required to bring sites forward. A detailed Technical Paper on housing land supply concerns has been prepared and is appended to this Issues Report justifying the Consortium’s position. The Council evidence to justify their housing trajectory is flawed and insufficient and having undertaken a detailed review of a sizeable proportion of the supply, the Consortium is of the opinion that at least 2,448 dwellings needs to be removed and replaced by alternative sources of supply. Not only that but the proposed supply pays no regard to the Council’s evidence on housing need which advocated that 65% of the supply needs to deliver 3 & 4 bedroomed properties.
- 5 **Fiddlers Ferry** – the Council has introduced a new mixed-use allocation into the Plan at the latest stage and the Consortium has considerable concerns in relation to the principle of the site’s inclusion. Not only that, the timescales for the delivery of the site as set out in the Plan are fanciful and are not grounded in any sense of reality. A detailed Technical Paper accompanies this Issues Report which sets out in details the considerable issues associated with the site.

The evidence which justifies the Fiddlers Ferry allocation is technically flawed and not legally sound. There are some significant omissions in the evidence, and it is the consortiums view that they have deliberately over exaggerated the sustainability merits of the site and hidden its technical failings to avoid allocating more suitable and sustainable greenfield releases. It is the consortiums view that the SA in relation to the assumptions made on Fiddlers Ferry is fundamentally flawed, results in an unsustainable approach to development, it is not sound, and it is not legally compliant. The identification and delivery of a brownfield site which over exaggerates its impact in the SA should not surpass the allocation of other more sustainable greenfield releases where it is clearly not justified. Not only that, Fiddlers Ferry is wholly unviable and as a consequence it is highly questionable whether the development could ever be delivered without significant intervention.

- 6 **Viability: Delivery of Affordable Housing and Infrastructure Delivery Issues** – the Consortium has significant concerns in relation to the viability of a large proportion of the Council’s claimed supply, and the subsequent ability of the emerging Local Plan to deliver the required number of affordable dwellings over the plan period. No regard has been paid to the viability of delivering a significant quantum of housing in Warrington Town Centre and the impact this will have on the delivery of much needed affordable housing and social infrastructure such as schools and medical centres to cater for future resident’s needs. A separate Technical Note on viability has been prepared by Roger Hannah (Viability Assessment Consultation Response) (November 2021) which sets out in detail the Consortium’s reservations regarding viability in the Town Centre and low value locations.

It is clear that the emerging Local Plan in its current form will not deliver on the required quantum of affordable housing or infrastructure provision across the Borough without significant alternative public sector funding being secured, or identifying a number of strategic Green Belt allocations with the ability of delivering reasonable proportions of affordable dwellings. The Consortium is strongly of the opinion that the failure to identify a sufficient level of housing allocations in the Plan, which have been tested as being viable, will result in the UPSVLP being found unsound at Examination.

- 7 **Failure to Identify Safeguarded Land** – The Consortium are strongly of the opinion that the current version of the Warrington Local Plan does not meet the requirements of the Framework as it does not identify sufficient proportions of land to meet needs post 2038 or identify safeguarded land which could act as a failsafe in the event that one of the key strategic allocations does not come forward as envisaged. Despite this Plan undertaking a Green Belt Review, no sites have been identified as safeguarded land to meet needs beyond the Plan period. Identifying safeguarded land does not allocate it for development and the same level of protection is afforded to safeguarded land as Green Belt provided the Council's Local Plan is delivering the homes and employment land that it envisaged.

9.6 To substantiate the key issues raised by the Consortium, this Issues Report is accompanied by a series of Technical Notes which provide further analysis, justification and context to the key issues set out above. This Issues Report should be read in conjunction with the following Technical Notes:

- 1 Note A – Housing Needs Analysis (Appendix 1)
- 2 Note B – Housing Land Supply Analysis (Appendix 2)
- 3 Note C – Fiddlers Ferry Technical Note (Appendix 3)
- 4 Note D – Viability Technical Note (Appendix 4)

9.7 The Consortium is of the view that significant changes must be made to the current version of the Warrington Local if it is to be found sound at Examination. That said, the Consortium is of the opinion that the changes required can be made in advance of and through Examination process. There are many examples from across the country where the housing requirement has been increased by a Planning Inspector to make a plan sound. Not only that, Inspectors have also identified additional allocations to meet identified needs and safeguarded additional land beyond that already identified in plans to meet future needs. For example:

- 1 The Inspector appointed to Examine the Cheshire East Local Plan uplifted the housing requirement during the Examination stage and also altered the spatial strategy with a requirement to identify allocations in the north of the borough which required Green Belt release.
- 2 During the examination of the Wyre Local Plan, the Inspector appointed identified that there was a shortage of housing land available to meet the identified housing need for the Borough. To address this issue, the Inspector identified a number of additional allocations which were included in the plan via Main Modifications.

9.8 We recognise that some of our recommendations may be unpopular with Members and may take significant time and resources to address. However, these key issues go to the heart of the Warrington Local Plan and addressing these issues head on is the only way that we believe a positive outcome can be achieved for all concerned.

Appendix 1 Note A - Housing Requirement Technical Note

Warrington Updated Proposed Submission Version Local Plan (2021) Housing Need Technical Note

Consortium of Developers and Housebuilders

November 2021

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1.0 Introduction

- 1.1 This report has been prepared by Lichfields on behalf of a Consortium of leading developers and housebuilders operating in the North West housing market including Ashall Property Ltd, Barratt Developments (Barratt Homes and David Wilson Homes), Northern Trust, Satnam Developments, Story Homes, and Wainhomes [the Consortium]. It has been prepared to analyse the housing need issues arising from the Warrington Updated Proposed Submission Version Local Plan [UPSVLP] and substantiates concerns regarding the Council's approach, to the Planning Inspector Examining the Local Plan.
- 1.2 This Review forms part of the evidence underpinning the Consortium's detailed technical representations to the Proposed UPSVLP. It focuses solely on matters relating to housing need and should be read in conjunction with other accompanying technical reports.
- 1.3 The members of the Consortium are all very active in the Warrington housing market and across the North West more generally, delivering much-needed homes for families and local communities. As such, the members have considerable 'on the ground' experience in the local market and understand the issues associated with the need for, and delivery of, new housing sites.
- 1.4 This report has therefore been prepared to assist Warrington Borough Council [WBC] by setting out what we consider to be the key soundness issues regarding the UPSVLP from a housing need perspective. We have also offered solutions to these issues which in our view go to the soundness of the Plan to help inform decision making as the UPSVLP progresses towards Examination.

Overview

- 1.5 The Consortium is very concerned that in producing the Publication Draft Local Plan, the Council has changed its stance on housing need and growth and moved away from a Plan that was aspirational in its ambitions to facilitate growth. This sudden contradiction is deeply concerning and is not robustly justified, leading to an unsound plan. We note that a number of the members of the Consortium formerly had advanced draft allocations in the plan. They had worked collaboratively with the Council for a number of years on the delivery of these sites, and following their unjustified removal we are clearly very disappointed with the contents of the latest draft.
- 1.6 Nevertheless, we consider that it is vital that Warrington progresses and adopts a sound and aspirational plan which accords with national policy as quickly as possible, ensuring that appropriate levels of housing and economic growth are pursued. The Warrington Local Plan is being prepared in unprecedented and challenging times but it needs to embrace this and act as a catalyst for growth by adopting policies which are ambitious, transformational and visionary in approach.
- 1.7 The delays to the UPSVLP and the High Court judgement of 19th February 2015 which overturned several housing policies in the adopted Warrington Local Plan Core Strategy (2015) including the housing target, has made it increasingly difficult to bring forward housing sites across the Borough as the number of deliverable allocations dwindles. It is no surprise that Warrington Borough is one of only eight North West Councils that fail the Government's Housing Delivery Test [HDT]. Warrington Borough Council has delivered such low levels of housing over the past three years that the HDT would automatically trigger the Framework's 'presumption in favour of sustainable development', which could mean that housing could be delivered through the submission and approval of speculative applications (see Table 1.1 below).

Indeed, the scale of the difference between the number of homes delivered and the number actually required, at -1,062 dwellings, is so substantial that it would place Warrington in the top 20 worst districts nationwide.

Table 1.1 Housing Delivery Test 2020 Analysis for Warrington Borough

	Local Plan status		Number of homes required (2017/18-2019/20)	Number of homes delivered (2017/18-2019/20)	Difference	HDT: 2020 Measurement	HDT: 2020 Consequence
	Adoption date	Age					
Warrington Borough	21 st July 2014, although certain housing policies have been removed	7 years	2,465	1,403	-1,062	57%	Presumption

Source: MHCLG (January 2021) / Lichfields' research

- 1.8 The Consortium has significant concerns in relation to the emerging UPSVLP; the strategic approach being taken and its associated evidence base; it should be the 'right plan or no plan'. Without substantial changes there is a significant risk that it would be found unsound at Examination. This would be an unsatisfactory outcome for everyone involved.
- 1.9 We have particular concerns in relation to the identified housing need position across Warrington and the extent to which the Council has reduced it from 945 dwellings per annum [dpa] in the previous March 2019 WLP submission version draft, to just 816 dpa in the 2021 version of the Plan. Pursuing the Standard Methodology's minimum starting point of 816 dpa over the 18-year plan period 2021/22-2038/39 will do little to assist the Government in its national 'levelling up' agenda, aimed at accelerating growth in the more disadvantaged parts of the country and particularly in northern England.
- 1.10 We also have serious concerns regarding how the emerging Plan seeks to 'backload' this housing requirement towards the end of the plan period, with a 'stepped housing requirement' of 678 dpa between 2021-2025 and 870 dpa thereafter. This is geared explicitly towards making it easier for WBC to defend its 5YHLS positions at future appeals rather than any practical difficulties in bringing forward additional Green Belt sites and providing the housing so desperately needed by households throughout the Borough as seen in the HDT results above.
- 1.11 The concern is not solely in relation to the quantum of units which will be delivered but also the type and size of units (with an over-reliance on high density apartments in Warrington Town Centre rather than larger family housing); and the extent to which affordable housing needs have been appropriately factored into the equation.
- 1.12 With this in mind, the purpose of this Technical Note is to clearly set out the key housing need concerns we have with the current version of the UPSVLP (September 2021) and provide Officers with the solutions for positively addressing the issues to ensure the plan can be found sound. The Consortium members remain willing to engage proactively with Warrington Planning Officers and assist in the plan making process. We would also be willing to explain in more detail the issues raised in this and other Technical Notes that we are producing, on housing need and affordable housing more generally, and the avenues to overcoming these matters which go to the very heart of the soundness of the emerging Plan for Warrington Borough. As it stands, the Plan is unsound and is contradictory in its aspirations for economic growth, whilst at the same time scaling down housing provision.
- 1.13 This document will also be used by the Consortium members as the foundation to inform individual representations to the UPSVLP moving forward. A significant proportion of the North West housebuilding industry is party to this Consortium and their united front

demonstrates the magnitude of the concerns they have with some of the emerging housing policies in the UPSVLP.

2.0 Policy Context

2.1 This section summarises the requirements of the National Planning Policy Framework [NPPF] and the Practice Guidance in identifying Local Housing Needs [LHN]. The standard method for calculating housing need set out in the NPPF (and set out in more detail in the revised 2019 Practice Guidance and once again in December 2020), provides relevant context for the direction of change the Government has moved towards, and the unwavering emphasis of seeking to substantially boost the supply of housing to attain a national target of 300,000 homes per year.

National Planning Policy Framework

2.2 The Revised NPPF was published in February 2018, with the most recent iteration issued in July 2021. It has an unequivocal emphasis on housing, with the introduction to the 2018 consultation proposals clarifying that the country needs radical, lasting reform that will allow more homes to be built, with the intention of reaching 300,000 net additional homes a year.

2.3 The NPPF sets out that the planning system should be genuinely plan led with succinct and up-to-date plans providing a positive vision for the future of an area [§15].

2.4 An important amendment to the 2021 NPPF from previous versions is the timeframe that Development Plans should prepare for to help facilitate larger scale developments:

“Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.” [§22]

2.5 In terms of housing, the NPPF supports the Government's objective of significantly boosting the supply of homes by ensuring that a sufficient amount and variety of land can come forward where it is needed; meeting the needs of groups with specific housing requirements; and ensuring that land with planning permission is developed without unnecessary delay [§60].

2.6 Regarding the calculation of housing need:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.” [§61]

2.7 The latest revision also makes clear that when identifying the housing need, policies should break this down by size, type and tenure of homes required for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own home) [§62].

2.8 Paragraphs 68-77 sets out how Councils should identify and maintain a five-year supply of housing against their housing requirement.

2.9 As an aside, the *Planning White Paper: Planning for the Future*, published on 6th August 2020, proposes some very significant changes to the planning system and has a clear focus on

accelerating housing delivery. It acknowledges that:

“Assessments of housing need, viability and environmental impacts are too complex and opaque: Land supply decisions are based on projections of household and business ‘need’ typically over 15- or 20-year periods. These figures are highly contested and do not provide a clear basis for the scale of development to be planned for.” [page 11]

- 2.10 As a result, the White Paper acknowledges that the current system simply does not lead to enough homes being built, especially in those places where the need for new homes is the highest.

“Adopted Local Plans, where they are in place, provide for 187,000 homes per year across England – not just significantly below our ambition for 300,000 new homes annually, but also lower than the number of homes delivered last year (over 241,000). The result of long-term and persisting undersupply is that housing is becoming increasingly expensive”. [page 12]

- 2.11 The White Paper therefore aims to address housing affordability pressures, support economic growth and the renewal of our towns and cities, and foster a more competitive housing market. To ensure more land is available for the homes and development people and communities need, and to support renewal of town and city centres, the White Paper proposes the following:

“A new nationally-determined, binding housing requirement that local planning authorities would have to deliver through their Local Plans. This would be focused on areas where affordability pressure is highest to stop land supply being a barrier to enough homes being built. We propose that this would factor in land constraints, including the Green Belt, and would be consistent with our aspirations of creating a housing market that is capable of delivering 300,000 homes annually, and one million homes over this Parliament.” [page 19]

Planning Practice Guidance

- 2.12 The Planning Practice Guidance [PPG] contains a section on Housing and Economic Development Needs Assessments. Following on from the revisions to the NPPF on 20th March 2019, MHCLG updated this section of the PPG to set out the calculation of Local Housing Need [LHN] via the standard methodology. This was again updated in December 2020, which abandoned earlier proposals and reverted back to the method it introduced in 2018, but with a modification to top up the LHN in the 20 largest cities and urban areas by 35%, reflecting Government objectives to drive housing towards existing urban areas and encourage brownfield development.

- 2.13 The PPG now states that:

“The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.”¹

- 2.14 If an authority uses a different method for calculating housing need, the PPG sets out how this should be tested at examination:

“Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.

¹ 2a-002-20190220

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination.”²

The Warrington Updated Proposed Submission Version Local Plan (September 2021)

- 2.15 The Warrington UPSVLP was published for consultation in October 2021 prior to its submission for independent Examination. The Council has also updated its evidence base relating to housing, employment and retail needs to ensure the Plan is based on up-to-date evidence, meets the requirements of the revised 2021 NPPF and associated PPG. The proposed Plan period extends from 2021 to 2038 (inclusive), which represents a reduction from the previous 20-year plan period to reduce the need for Green Belt release.
- 2.16 The Council has also put forward a number of other significant changes from the previous Proposed Submission Version Local Plan (2019) which include:
- a reduction of the Plan’s housing requirement from 945 dpa to 816 dpa (-14%);
 - the allocation of the Fiddlers Ferry site for employment and housing, following closure of the power station in March 2020;
 - the removal of some of the previous Green Belt allocation sites, including Port Warrington and the Business Hub, the South West Urban Extension, the Phipps Lane site in Burtonwood and the Massey Brook Lane site in Lymm; and,
 - the reduction in size of the South East Warrington Urban Extension (previously known as the Garden Suburb).
- 2.17 The amount of land to be removed from the Green Belt is 480 ha, which is significantly lower than the 1,210 ha previously proposed for removal.
- 2.18 The Plan’s Vision is for Warrington’s long-term growth to be ‘positively planned’, with new housing development supporting Warrington’s economic growth and focused on creating attractive, well designed, sustainable and healthy communities. New homes are intended to meet a wide range of needs including those of families, those struggling to afford their own home, elderly people and disabled people.
- 2.19 Objective W1 of the Plan aims to enable the sustainable growth of Warrington through the ongoing regeneration of Inner Warrington, the delivery of strategic and local infrastructure, the strengthening of existing neighbourhoods and the creation of new sustainable neighbourhoods whilst:
- delivering a minimum of 14,688 new homes (equating to 816 per year) between 2021 and 2038, and
 - supporting Warrington’s ongoing economic success by ensuring provision is made to meet the need for 316.26 hectares of employment land between 2021 and 2038.
- 2.20 The spatial strategy for meeting the need for new homes is set out in paragraphs 3.3.7 and 3.3.8. This sets out that the existing urban area can accommodate around 11,800 new homes. This means there is the requirement to release Green Belt land for around 4,500 homes in order for

² 2a-015-20190220

the Council to meet its 816 dpa housing target. The Council has considered a range of options for the distribution of homes requiring Green Belt release. The chosen spatial strategy is for:

- an urban extension to the south east of the main urban area, which will deliver around 2,400 homes in the Plan period up to 2038, with a potential for a further 1,800 homes beyond the Plan period;
- development of Fiddlers Ferry opportunity site for 1,300 homes in the Plan period up to 2038, with a potential for a further 450 homes beyond the Plan period;
- development at Thelwall Heys of around 310 homes; and
- ‘incremental growth’ across the outlying settlements of around 800 homes.

2.21 Policy DEV1 confirms the Plan’s overall housing target of a minimum of 14,688 homes and sets out where new homes will be delivered and over what time period.

2.22 The supporting text to this Policy clarifies that the 816 dpa target has been established using the Government’s Standard Housing Methodology and has been assessed within the Council’s Local Housing Needs Assessment Update [LHNAU] (2021).

“This represents the minimum number of homes that Warrington is expected to plan for, in a way which addresses projected household growth and historic under-supply. In parallel the Council has also updated its Economic Development Needs Assessment to ensure that the Plan’s housing and employment requirements are balanced.

The Local Housing Needs Assessment models the increased working age population that would result from a housing requirement of 816 homes per annum up to 2038 (15 years post the estimated adoption of the Plan). This increase in working age population is considered to be sufficient to support the number of additional jobs that are likely to be created in Warrington, taking into account the latest jobs forecasts for the Borough. Setting the housing requirement of the Plan to the minimum requirement under the Government’s methodology therefore has the potential to meet Warrington’s future housing needs and support its continued economic growth, whilst minimising the impact on the Borough’s Green Belt.”
[paragraphs 4.1.6-4.1.9]

2.23 Policy DEV1 goes on to state that 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 a deliverable capacity for a minimum of 11,785 new homes.

2.24 The Policy identifies the following sites for removal from the Green Belt to be allocated for residential development:

- a South East Warrington Urban Extension – minimum of 4,200 homes of which a minimum of 2,400 homes will be delivered in the Plan Period.
- b Land at Fiddlers Ferry – minimum of 1,760 homes of which 1,310 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.

2.25 Furthermore, 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

2.26 The supporting text to the Policy summarises the land requirement to meet the 816 dpa target, which includes provision for flexibility on top of the overall land supply to allow for market choice and in the event that specific sites do not come forward. *“The Council has used a benchmark of 10% which it considers provides sufficient flexibility in the context of the Plan’s proposed housing land supply.”* [paragraph 4.1.11]

2.27 In identifying land to meet the housing requirement, the Council has sought to maximise the capacity of the existing urban area to accommodate new development to minimise Green Belt release. The resultant housing land supply including the 10% flexibility is reproduced in the Table taken from the Plan below:

Table 2.1 Land Requirements over the Plan Period

	Housing Land Requirements
Annual target	816
2021 to 2038	14,688
Flexibility @10%	1,469
Total Requirement	16,157
Urban Capacity	11,785
Green Belt Requirement	4,372

Source: Warrington Updated Proposed Submission Version Local Plan (September 2021), Table 1

2.28 With regards housing density, Policy DEV1 goes on to state that 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 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 50vdph 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 30 dph on other sites that are within an existing urban area.

2.29 The Policy requires that densities of less than 30dph 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.

2.30 Finally, the Policy sets out the Council’s proposal to have a stepped housing requirement:

“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.

Should monitoring indicate that a 5-year deliverable and / or subsequent developable supply of housing land over the Plan Period can no longer be sustained, the Council will give consideration to a review or partial review of the Local Plan.”

2.31 The justification for the stepped approach to delivery is set out in the supporting text:

“The trajectory confirms that the Plan provides for a sufficient land supply to deliver the housing requirement for the Borough over the Plan Period as a whole. However, the need to

release Green Belt land and the lead in times for the infrastructure required to support the larger allocation sites means that there will be a relatively lower level of housing delivery in the early years of the Plan Period, with housing delivery increasing over time.

The Council is therefore proposing a Stepped Housing Requirement. The housing requirement over the first 5 years will be 678 dpa. This will match deliverable supply over this period when the 20% buffer is added. The requirement over the remaining 13 years of the Plan, will increase to 870 dpa. This will ensure the overall requirement of 14,688 is met.

The Government’s planning guidance recognises that such an approach is appropriate where strategic sites such as those being proposed by the Council will have a phased delivery or are likely to be delivered later in the plan period.” [paragraphs 4.1.19-4.1.21]

2.32 The Council recognises that consideration must be given to housing land supply beyond the Plan period if it is to demonstrate the permanence of the revised Green Belt boundaries in accordance with the NPPF paragraph 22.

2.33 As set out in Table 2 from the Plan (reproduced below), the Council has assumed that over the period 2028 to 2038 household growth will reduce to an annual average of 605 homes per annum, and that housing affordability will have (conveniently) reduced to the point at which no further uplift is required. The UPSVLP then assumes that the 1,948 flexibility figure can be included again post 2038, plus an assumed pdl allowance of 3,024 dwellings and the undelivered units from the three large strategic sites at the Garden suburb, Fiddlers Ferry and the Waterfront, with the indicative need meeting the indicative supply and that no further amendments to the Green Belt are required:

Table 2.2 Development needs beyond the Plan Period

Indicative Housing Requirement 2038 to 2050	
Annual household growth 2028-38*	605
Projected forward 2039/40 to 2050/51 (12 years)	7,260
Number of homes required 2039/40 to 2050/51**	7,406
Indicative Housing Supply 2038 to 2050	
Additional supply within Plan from flexibility	1,948
Garden suburb delivery post 2038	1,800
Fiddlers Ferry delivery post 2038	450
Waterfront delivery post 2038	265
Assumed brownfield development	3,024
Total indicative supply	7,487

Source: Warrington Updated Proposed Submission Version Local Plan (September 2021), Table 2

*2014-based household projections

**Based on calculation used in LHNAU

2.34 Moving on, Policy DEV2 provides the basis to ensure that the full range of Warrington’s housing needs are met. This means ensuring homes are provided for those who require affordable housing, for families with children, older people, students, those with disabilities, service families, people who rent their homes and those wishing to commission or build their own homes.

2.35 The supporting text to this Policy regarding affordable housing states that the NPPF requires Local Plans to meet their full, objectively assessed needs for affordable housing where this is consistent with other Plan policies:

“Warrington’s Local Housing Needs Assessment (2021) assesses the overall need for affordable housing. It concludes that the overall need for affordable housing amounts to 433 dpa between 2021 and 2038. Despite this having increased from 377 since the previous LHNA

(2019) was published, gross need has actually reduced but so too have re-lets of existing properties and so overall need has increased to 433 homes per annum...

The Council has considered the Borough’s total affordable housing need in the context of its likely delivery through Policy DEV2. If the full need was to be met in this way then this would require a significant increase to the overall housing requirement to a level comparable to that which raised significant environmental concerns when assessed as part of the Preferred Development Option and later at the Proposed Submission Version Local Plan consultation in 2019. Any significant increase would also require housing to be delivered at a consistently higher rate than Warrington has achieved historically. The Council is therefore not proposing a further uplift to its proposed housing target of 816 dpa.” [paragraphs and 4.1.35 and 4.1.38]

2.36 Moving on, the Policy states that in residential development of 10 dwellings or more, or with a gross floor area greater than 1,000 sqm, affordable housing will be required to be provided on the following basis:

- a 20% on sites within Inner Warrington, inclusive of the Town Centre.
- b 30% elsewhere in the Borough and on all greenfield sites irrespective of their location.

2.37 Regarding Housing Type and Tenure, Policy DEV2 states that “*residential development should provide a mix of different housing sizes and types and should be informed by the Borough-wide housing mix monitoring target in the table below; the sub-area assessment contained in the Council’s most up to date Local Housing Needs Assessment; and any local target set by a Neighbourhood Plan, taking into account site specific considerations.*”

2.38 The supporting text to Policy DEV2 refers to the LHNA’s split of housing need by both tenure and type of housing, as reproduced in the Table below:

Table 2.3 Housing demand in Warrington

	1 bedroom	2 bedroom	3 bedroom	4+ bedroom
Market	5%	30%	50%	15%
Affordable home ownership	20%	40%	30%	10%
Affordable housing (rented)	40%	30%	25%	5%

Source: Warrington Updated Proposed Submission Version Local Plan (September 2021), Table 3

2.39 The Plan accepts that in the market sector, a balance of property sizes is required that takes account of current demand and the changing demographic profile over the plan period. This includes a proportion of 2 bedroomed market properties for which there is a demand in Warrington as there is a low level of existing stock.

“It should be noted that the breakdown of housing mix identified is a Borough-wide monitoring target. The precise mix should be determined on a site by site basis, taking in account the sub-borough analysis which is contained in the Council’s most up to date Local Housing Needs Assessment.” [paragraph 4.1.55]

2.40 Finally, the Policy requires residential developments of 10 dwellings or more to provide housing for older people. The justification for this Policy is summarised thus:

“The LHNA identifies the need for around 25% of new homes in Warrington to be provided to accommodate older persons and for an additional 1,053 bedspaces within extra care facilities (LHNA Table 48). Whilst the need for bedspaces needs to be addressed over the plan period, the Council’s overall strategy to encourage more independent living will be an important factor in decision making, where this is appropriate.” [paragraph 4.1.61]

3.0 Defining Housing Need in Warrington

Principles behind the Local Housing Need Calculations

- 3.1 The NPPF sets out that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the Standard Method [§60]. The introduction of a Standard Method for assessing housing needs was intended to shift time, resources and debate at examination away from the ‘numbers’ question and towards the ‘how’ and ‘where’ of building new homes. This method – which equated to a figure of around 266,000 per annum nationwide when launched – was (and still is) based on the 2014-based Household Projections plus an uplift for affordability, and subject to a ‘cap’.
- 3.2 In August 2020, the Government consulted on a proposed new Standard Method, which had a greater focus on affordability, the results of which were to boost the national figure to c.337,000, with most of the increases in areas where the gap between house prices and incomes was greatest. However, following a political and media backlash, these proposals were reviewed and on 16th December 2020, the Government launched its solution [SM2], which reverted back to the method it introduced in 2018, but with a modification to top up the number in the 20 largest cities and urban areas by 35%. This was partly to reflect Government objectives to drive housing into existing urban areas and encourage brownfield development.
- 3.3 UPSVLP Policy DEV1 states that over the 18-year plan period from 2021 to 2038, a minimum of 14,688 new homes will be delivered to meet Warrington’s housing needs. This equates to an average of **816 dpa** and accords with the minimum LHN derived from SM2 as of October 2021. Overall, this LHN is lower than the previous 2019 submission draft WLP target of 945 dpa.
- 3.4 The latest SM2-based 816 dpa target uses the 2014-based household projections with an affordability adjustment; no cap is applied to the figure.
- 3.5 This initial LHN target is correct, but it represents only the starting point for identifying housing need in Warrington Borough. **The Government is quite clear that the figure derived by the SM2 is intended to be a minimum.** The PPG sets out the circumstances whereby a higher (or lower) figure might be considered. This is because the standard method does not attempt to predict the impact that future national or local government policies, such as the levelling up agenda or Northern Powerhouse aspirations. Nor does it account for changing economic circumstances (e.g. arising from the Covid-19 pandemic), or other factors that might impact demographic behaviour.

Commentary on the Warrington Local Housing Needs Assessment Update (August 2021)

Overview

- 3.6 GL Hearn’s Warrington Local Housing Needs Assessment Update [LHNAU] (August 2021) forms a key part of the Council’s evidence base helping to justify WBC’s decision to take forward the 816 dpa housing target derived from the Government’s SM2 in its emerging Local Plan.
- 3.7 The report is an update of GL Hearn’s 2019 Local Housing Need Assessment for WBC, which recommended a housing requirement of 945 dpa; the Liverpool City Region Strategic Housing and Employment Land Market Assessment [SHELMA] in March 2018, which identified an objectively assessed need for 949 dpa; the 2017 SHMA Update Warrington Addendum (955 dpa); and the Mid Mersey SHMA (January 2016) (839 dpa).

- 3.8 The latest report confirms that the SM2 LHN figure for Warrington Borough of 816 dpa is based on a household growth figure of 715 hpa plus an affordability uplift of 14.2% (due to a high affordability ratio of 6.27 in 2020). No cap is applied as the Local Plan is more than 5 years old (and the housing target therein has been quashed in any case).
- 3.9 The LHNAU goes on to state that:
“While the Standard Method removes any consideration of economic growth within an OAN for housing, there is still a requirement for local authorities to align their economic and housing strategies. If they fail to do so they would either struggle to meet their economic growth aspirations or draw on a greater level of workforce outside the Borough thus creating commuting patterns that may be unsustainable. The PPG is also clear that the Standard Method is also a minimum and that where growth strategies are in place this might entail the actual housing need being higher than the figure identified by the Standard Method ” [paragraphs 6.2-6.3].
- 3.10 The report examines the scale of housing need required to meet the Borough’s economic ambitions. It analyses the latest Oxford Economics [OE] and Cambridge Econometrics [CE] employment forecasts over the plan period to provide a starting point to understand the number of new homes that would be needed to support jobs growth, and to test whether this could be accommodated within the 816 dpa LHN target.
- 3.11 In analysing the forecasts, OE put forward an annual increase of 725 additional jobs per annum, whilst CE forecast 1,023. The Compound Annual Growth Rates [CAGR] between the previous OE and CE forecasts which informed the 2019 LHNA were comparable, at 0.39%. However, whilst both have increased (to 0.48% and 0.65% respectively), they have diverged on account of differing assumptions on the anticipated pace of the recovery of the economy from the effects of COVID-19. OE assumes a recovery of employment in 2021 whilst CE projects a greater loss in 2021 compared to 2020 [paragraph 6.14].
- 3.12 GL Hearn concluded that the CE forecasts are too optimistic while the OE forecasts are unduly pessimistic; therefore, the LHNAU arrived at a ‘mid-point’ forecast employment growth of **874 new jobs each year (14,855 over the plan period), with a CAGR of 0.57%.**
- 3.13 To check whether an employment-led housing needs figure that exceeds the 816 dpa Standard Method-based figure is justified, GL Hearn calculated the level of job growth would be supported were this number of homes to be delivered. This involved making a number of assumptions relating to double-jobbing, commuting, economic activity rates, and household formation rates. They concluded that if the 2011 Census commuting rate is factored into the equation, then 816 dpa could support 18,328 jobs over the plan period, falling to 16,069 if commuting is assumed to be on a 1:1 ratio for new jobs. As a consequence:
“a ‘mid-point’ figure of 874 jobs per year or 14,855 dwellings over the plan period is put forward as a reasonable forecast for future employment growth. It is important to note that the figure of 18,300 additional jobs exceeds not only this forecast but also the CE forecast of 17,391 over the period 2021-2038, the upper end of the range...It is therefore reasonable to assume the standard method-based HNF of 816 dpa will provide enough homes to support employment growth even where an optimistic jobs growth scenario is envisaged.” [paragraphs 6.43-6.44]
- 3.14 Furthermore, GL Hearn concludes that to sustain 874 jobs per year, there would need to be provision of around 696-765 homes each year in Warrington, below the SM2 housing figure of 816 dpa. *“These figures are both below the 816 dwellings per annum derived from the Standard Method and suggests that delivering at the Standard Method OAN would provide a sufficient labour-supply for additional jobs to be filled.”* [paragraph 6.51]

3.15 Moving on to affordable housing needs, the report states that when looking at rented needs, the analysis **suggests a need for 423 affordable dpa** and therefore the Council is justified in seeking to secure additional affordable housing. There is also a need shown in all parts of the Borough. The 423 dpa figure represents a 12% increase on the 377 dpa affordable housing need identified in the 2019 LHNA. The difference is driven by a lower level of re-let supply (i.e. churn in the existing stock) in the more recent study. GL Hearn argues that the relationship between affordable housing need and overall housing need is complex and does not necessarily require an uplift to the LHN figure:

“The analysis for Warrington estimates an annual need for 423 rented affordable homes, which is notionally 52% of the minimum Local Housing Need of 816 dwellings per annum. However, as noted, caution should be exercised in trying to make a direct link between affordable need and planned delivery, with the key point being that many of those households picked up as having a need will already be living in housing and so providing an affordable option does not lead to an overall net increase in the need for housing (as they would vacate a home to be used by someone else).

It is possible to investigate this in some more detail by re-running the model and excluding those already living in accommodation. This is shown in the table below which identifies that meeting these needs would lead to an affordable need for 109 homes per annum. This figure is theoretical and should not be seen to be minimising the need (which is clearly acute).”

[paragraphs 8.72-8.73]

3.16 The report also considers that the role played by the private rented sector in providing housing for households who require financial support in meeting their housing needs should be recognised as part of the functioning housing market. In conclusion:

“The analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the Borough. It does however need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. As noted previously, the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.” [paragraph 8.82]

3.17 Turning to house size requirements, GL Hearn’s analysis linked to long-term (17-year) demographic change concludes that the following represents an appropriate mix of affordable and market homes (this takes account of both household changes and the ageing of the population):

Table 3.1 Suggested Mix of Housing by Size and Tenure in Warrington

	1 bedroom	2 bedroom	3 bedroom	4+ bedroom
Market	5%	30%	50%	15%
Affordable home ownership	20%	40%	30%	10%
Affordable housing (rented)	40%	30%	25%	5%

Source: Warrington Updated Proposed Submission Version Local Plan (September 2021), Table 3

3.18 This Table has been included in full in the draft UPSVLP (in the supporting text to Policy DEV2).

Critique

- 3.19 Lichfields has fundamental concerns with the approach taken by GL Hearn to define the LHN on a number of levels.
- 3.20 At the outset, it is important to note that **the Council’s housing evidence (the 2021 LHNAU) and the UPSVLP actually have slightly different timeframes.** The Local Plan is working to an 18-year timeframe (see paragraphs 3.1.3; 6.5; 4.1.30 etc and Objective 1, which states that the Council will deliver 14,688 homes equating to 816 a year between 2021 and 2038). The Housing Trajectory in Appendix 1 clarifies that the Plan’s timeframe is actually 2021/22 to 2038/39, and therefore should arguably be running from 2021 to 2039, not 2038.
- 3.21 In contrast, GL Hearn’s work is over a 17-year timeframe, running from 2021 to 2038 (presumably, 2020/21 to 2037/38). See for example, paragraphs 6.25 (“*The analysis shows that there would be an estimated increase in the economically active population of around 11,600 people (a 10% increase over 17-years)*”) and 10.15 (“*Warrington is projected to see a notable increase in the older person population, with the total number of people aged 65 and over projected to increase by 39% over the 17-years to 2038.*”), whilst Table 31 which projects housing need based on the jobs-led scenarios clearly states that the analysis has been completed for 17, not 18 years (by indicating that the change in households is 11,488, which equates to 676 per annum). This error is indicative of the extent to which the Local Plan and its own evidence base are fundamentally flawed, unjustified and unsound as a result.

Inconsistent Approach with Previous Iterations

- 3.22 As set out above, GL Hearn’s work moves away from (and is therefore inconsistent with) the approach taken to identifying housing need as followed in their previous studies for WBC, and also for the Liverpool City Region districts.
- 3.23 To recap, the 2019 LHN report involved GL Hearn taking the baseline job growth projections from Oxford Economics and applying a ‘policy on’ adjustment to the forecasts. This was termed a sensitivity to the former SEP level of growth recognising the reduction in the OE baseline forecasts. Their approach was to apply an uplift of 319 jobs per annum to the lower 2018 OE baseline (635 jobs per annum), equal to 954 jobs per year.
- 3.24 The broad conclusions were that the OE baseline growth is likely to be too low (12,698 jobs over the 2017-37 period) and the SEP growth is likely to be too high (24,800 over the 2017-37 period). The adjusted SEP growth, taking into account the lower baseline growth, calculated an adjusted growth of 19,078 jobs over the 2017-37 period. GL Hearn estimated that the Standard Method housing need figure (909 dpa) could support around 16,200 jobs:
- OE 2018 Baseline: 12,698 jobs
 - LHN 909 dpa: 16,200 jobs;
 - SEP Uplift: 19,078 jobs;
 - Former SEP Growth: 24,800 jobs.
- 3.25 Translating this into housing need, GL Hearn made a number of assumptions relating to double-jobbing, commuting, economic activity rates, and household formation rates. The core analysis (SEP Uplift) identified a housing need of 945 dpa, which included a part return to trend household formation rates (increasing the need up from 907 dpa).
- 3.26 The LHNA report concluded that as the 945 dpa target associated with the SEP Uplift jobs target “*is above the standard methodology the Council should consider this level of growth in order to*

ensure the borough meets its economic potential while still improving local household formation rates”. [page 22]

3.27 The 2021 Update to this work does not follow this approach. The key differences are as follows.

SEP Policy On approach

3.28 Firstly, and perhaps most importantly, the 2019 LHNA’s 945 dpa figure is based on a ‘policy on’ level of job growth. The 2021 iteration makes no such adjustment and instead compares two baseline projections for OE and CE.

3.29 As set out in the ‘Policy On Economic Growth’ section of its 2019 report, GL Hearn notes that the basis of the level of growth identified was reflective of specific local investment in the area as adopted by the Local Enterprise Partnership in their Strategic Economic Plan [SEP]:

“The SEP set out a range of investments in Warrington which were intended to improve the performance of the local economy above baseline growth. These investments included the following key areas:

- Transport Investment*
- Skills and Education*
- Energy*
- Quality of Place*

While these investments have not gone away it is clear from the analysis above that the baseline on which they sit upon have substantially reduced out with the control of the LEP. We have therefore sought to isolate the growth within the SEP forecast resulting from the investment and apply that level of growth to the revised baseline. This is particularly relevant given that some of the reduced sectors include those which are likely to see investment including:

- Land transport and transport via pipe*
- Telecommunications*
- Other professional, scientific*

We have created a sensitivity to the former SEP level of growth recognising the reduction in the OE baseline forecasts. Our approach has been to apply an uplift of 319 jobs per annum to the new, lower OE baseline (635 jobs per annum). This is the level of increase (319 jobs per annum) is the level of growth the SEP forecasts were above the previous OE forecasts, the uplift being a reflection of the intended consequence of the investment.” [2019 LHNA, paragraphs 3.19-3.22]

3.30 We are unclear why GL Hearn has now decided that its policy-on scenario, which played such a prominent part in the 2019 LHNA and underpinned the previous WLP housing target of 945 dpa, should now be abandoned.

3.31 Its sole justification for this departure is as follows:

“In light of the lower standard-method housing need figure, the impacts of Brexit, along with the ongoing COVID-19 pandemic (the Pandemic), GL Hearn is of the view that the previous SEP figure of 945 dpa is now too high and not reflective of an achievable level of housing delivery.” [2021 LHNAU, paragraph 6.6]

3.32 The basics underpinning the standard methodology remain unchanged from 2019, in that they still use the 2014-based household projections and the median workplace-based affordability ratio (which has changed only marginally from 6.36 in the 2019 report to 6.27 in 2020).

- 3-33 Clearly the impact of the pandemic has been unprecedented, and the three lockdowns have clearly had some impact on delivery targets in 2020, which is reflected in the Government's adjustments to the HDT for 2020 (effectively deducting 4 months of need from the calculation). However, there is no indication that this will suppress housing delivery over the next 4 years, quite the opposite in fact. **The soaring property prices throughout the pandemic, which continue at the time of writing, have exceeded all expectations.** They show no sign of slowing down even after the end of the stamp duty holiday, with Covid-related changes in households' priorities driving a strong demand for larger family properties in particular. Nationwide recently reported that UK house prices rose 13.4% in the year to June 2021, the fastest pace since November 2004³. There has arguably never been a better time to deliver housing to meet unmet demand; actually, restricting housing supply will have a disastrous effect in Warrington as it will elsewhere.
- 3-34 The NPPF [§82c] states that planning policies should “*seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment*”. **This retains the link between integrating economic growth aspirations and housing need.** There is a clear risk that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment. Ensuring a sufficient supply of homes within easy access of employment opportunities represents a central facet of an efficiently functioning economy and can help to minimise housing market pressures and unsustainable levels of commuting (and therefore congestion and carbon emissions). If the objective of employment growth is to be realised, then it will generally need to be supported by an adequate supply of suitable housing. The challenge of meeting employment needs is clearly of great importance, and the NPPF highlights this by stating that “*significant weight should be placed on the need to support economic growth and productivity*” [§81].
- 3-35 It is therefore essential that sufficient housing is provided in order to accommodate an increase in the workforce. In order to ensure that sufficient housing is provided, the employment and economic growth assumptions used in the evidence base should be based on robust, realistic and transparent evidence.
- Accelerated household formation rates
- 3-36 Secondly, the 2019 report rightly adjusts household formation rates to reflect the fact that younger residents' ability to access the housing market has been suppressed:
- “Given the historic and projected suppression set out in the 2014-based projections, it would be reasonable to consider a further adjustment, as otherwise, local residents in these younger age groups would not be able to form in the way in which they would perhaps like or had done so historically.”* [paragraph 3.54]
- 3-37 This ‘part return to trend’ scenario has the result of uplifting the housing requirement from 907 dpa, to 945 dpa, the figure which was ultimately taken forward by the Council in its 2019 WLP.
- 3-38 GL Hearn states in its 2019 report that this approach is justified as otherwise local residents would not be able to form in the way in which they would perhaps like [paragraph 8.15]. However, they have not done this in their 2021 Update, and no explanation is offered as to why this is no longer justified.
- Unemployment
- 3-39 The 2019 LHNA report applied standard OBR economic activity rates to the population growth and assumed that the number of people unemployed in 2017 (the base date for the economic

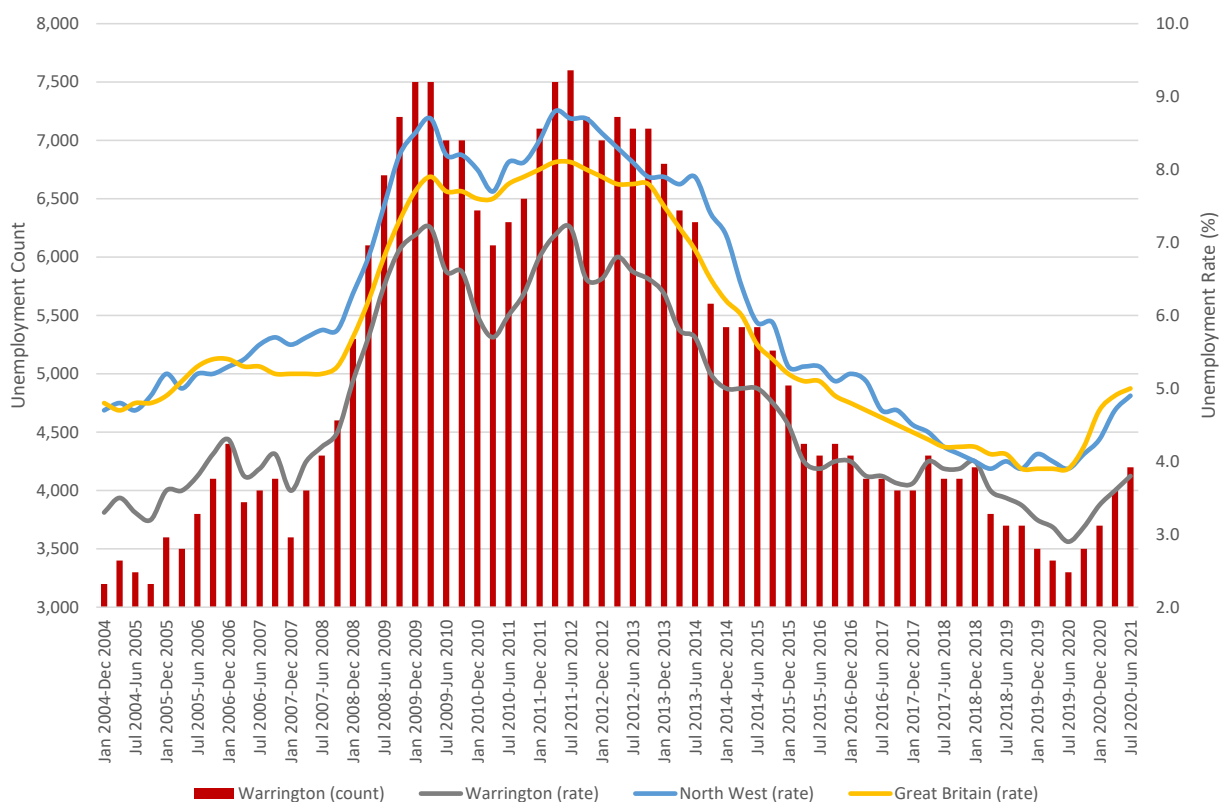
³ <https://www.bbc.co.uk/news/business-57648935>

forecasts) remains the same moving forward to 2037. In contrast, the 2021 Update appears to assume (in Table 30) that a 'latent labour supply' of 4,101 residents can be factored into the workforce over the period 2021-2038. This appears to align with the 4,101 fall in employment between 2019 and 2021, which is taken as an average from the OE and CE forecasts.

“For the purposes of modelling, it has been assumed that there have been around 4,100 jobs lost (this figure is based on economic forecasts described below but is consistent with the claimant count data); with levels of double jobbing, this would equate to just under 4,000 people being made unemployed. For the purposes of modelling, it is assumed that this is the level of latent labour supply that can move back into work in the future (effectively over the period to 2038).” [paragraphs 6.40-6.41]

- 3.40 This essentially assumes that **all of these people will return to the workforce** and can be netted off the job targets. This has a very significant impact on suppressing the housing need target, as it is assuming that there is no need to provide any new homes for these c.4,000 residents as they either live in Warrington Borough already, or will continue to commute in from elsewhere.
- 3.41 Whilst this approach is highly dubious and unusual (GL Hearn did not attempt any such reduction to unemployment levels in its previous report and we are not aware of any other examples whereby they have followed a similar approach on behalf of LPAs), it is fundamentally flawed when one analyses the latest ONS data.
- 3.42 According to the ONS Annual Population Survey (July 2020-June 2021), a total of 4,200 people living in the Borough are unemployed. This equates to a rate of 3.8%. In itself, this is very low – the North West regional unemployment rate is currently 4.9%, whilst the Great Britain rate is 5.0% - but even so, GL Hearn's approach would have us believe that it is realistic for the unemployment level to fall from 4,200 to just 200 by the end of the Plan period. Given that a level of 3% is often taken by economists to be a figure broadly equating to full employment, GL Hearn's approach is virtually impossible to achieve in the real world.
- 3.43 As can be seen in Figure 3.1, Warrington Borough's unemployment count has not fallen below 3,200 (September 2005), whilst the unemployment rate has not dipped below 2.9% (June 2020), hence the 4,200 / 3.8% figures remain historically low.

Figure 3.1: Unemployment in Warrington Borough



Source: ONS Annual Population Survey July 2020-June 2021. Note: numbers and % are for those aged 16 and over. % is a proportion of economically active

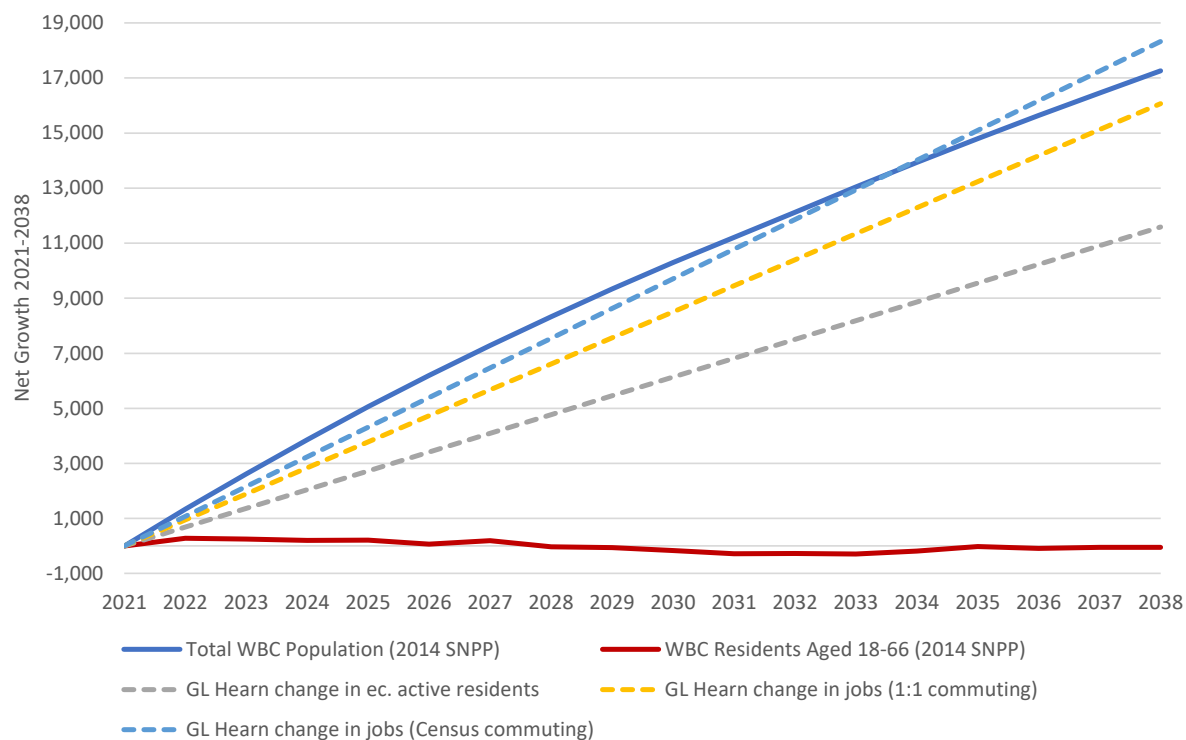
- 3.44 If GL Hearn were to keep unemployment rates broadly constant and exclude the spurious ‘latent labour supply’ adjustment, then we would almost certainly find that the Borough’s housing need associated with its job targets is significantly higher.

Simple demographics

- 3.45 **At the most basic level, GL Hearn’s work does not stand up to scrutiny.** They are asking us to accept that depending on the approach taken to commuting patterns, the baseline 2014-based SNPP can support between 16,069 and 18,328 jobs, incorporating an increase of 11,592 economically active residents. However, the 2014-based SNPP indicates that between 2021 and 2038, **the number of Warrington residents aged between 18 and 66 will actually decrease, by 284.**

- 3.46 The problems with GL Hearn’s approach are starkly illustrated by Figure 3.2, which clearly shows how the net job growth and economic activity levels assumed by GL Hearn bear absolutely no relationship with the likely growth in residents of an age to take up those employment opportunities. Whilst the overall population growth in the 2014-based SNPP does keep up with GL Hearn’s estimated jobs growth aligned with the SM2 816 dpa, this is only because virtually all of this growth is concentrated in the growth in residents aged over 66 (forecast to grow by 16,539 people over the plan period to 2038). It is quite obvious that GL Hearn’s modelling assumptions would require the bulk of job growth to be sustained by Warrington residents who would ordinarily be enjoying their retirement.

Figure 3.2: Population Change in Warrington Borough vs. GL Hearn modelling assumptions



Source: ONS 2014-based SNPP / GL Hearn (2021): Warrington Local Housing Needs Assessment Update / Lichfields analysis

3.47 This suggests that either economic activity rates are going to have to increase dramatically (which is unlikely given the very low unemployment levels seen above), or that far more older residents are going to have to stay working long after their statutory age of retirement has passed. Whilst a modest adjustment to this effect is reasonable, the sheer scale of GL Hearn’s adjustment does not appear to be credible. Given that the vast majority of the over 66s are likely to be leaving the workforce, or at least winding down towards retirement, it is unclear how Warrington’s population will possibly accommodate a net employment growth of 18,328 over the same time period. GL Hearn suggests that those aged 66 and over will work beyond this age when the opposite is likely to be true. It is more likely that people in this age bracket will be looking to retire at that point in their lives or work a reduced number of days/hours as they edge towards retirement.

3.48 The NPPF is clear that housing should not be a barrier to economic growth. It is therefore essential that sufficient housing is provided in order to accommodate an increase in the workforce. If this provision is not made, the likely outcome is an increase in commuting into Warrington from outside of the Borough. In order to ensure that sufficient housing is provided, the employment and economic growth assumptions used in the LHNA should be based on robust, realistic and transparent evidence, which is not currently the case.

Alignment with the Employment Land Requirement

3.49 The Consortium is concerned that both GL Hearn and the Council appear to have fundamentally misinterpreted the Local Plan’s aspirations for economic growth. The UPSVLP congratulates itself on aligning its housing requirement with likely job growth:

“The Local Housing Needs Assessment models the increased working age population that would result from a housing requirement of 816 dpa up to 2038 (15 years post the estimated adoption of the Plan). This increase in working age population is considered to be sufficient to

support the number of additional jobs that are likely to be created in Warrington, taking into account the latest jobs forecasts for the Borough.” [paragraph 4.1.8]

3.50 Whilst it is true that GL Hearn has modelled both OE and CE job forecasts in its housing need assessment (and notwithstanding our fundamental criticisms of the approach used as set out above), both WBC and GL Hearn are missing the point. The UPSVLP is not planning for a level of employment growth commensurate with either the OE or CE projections. It is quite clearly planning to accommodate “316.26 hectares of employment land to support both local and wider strategic employment needs”, as set out in Policy DEV4.

3.51 **Why does this matter? It matters because the 316 ha employment land target does not align with either the OE or the CE projections and if, as expected, the majority of such land comes forward for development by 2038 it will undoubtedly accommodate far higher levels of employment than could be sustained by 816 dpa.**

3.52 Taking a step back, it is important to understand where the 316.26 ha target has come from, and how it has been calculated. The supporting text to UPSVLP Policy DEV4 states that:

“In determining the amount of employment land needed for the Plan period, the Economic Development Needs Assessment (2021) concluded that the preferred forecasting method for establishing need, is a projection forward of past take-up rates that considers both strategic and local needs, resulting in a need of 316.26 hectares of employment land up to 2038.”
[paragraph 4.2.13]

3.53 Reference to WBC’s “Economic Development Needs Assessment Refresh” [EDNA] (August 2021), produced by BE Group, indicates that this need is based on historic (24 years) take up from 1996/97-2019/20 of 14.22 ha per annum, including Omega, an adjustment for displacement and a 3 year buffer (see Table 20 of the EDNA). Table 43 of that report confirms that over that same time period, the Borough grew by 48,350 jobs, or **2,015 annually**. This equated to an employment land take up of 341.29 ha.

“Table 39 shows that net jobs growth during the period, would have resulted in more modest land needs between 1996-2021 which represent only a fraction of what was taken up. Thus, the trend shows that net jobs growth is not an accurate method of calculating land. Even when land is calculated on the sectors that generate a positive jobs figure over the period, there is still a sizable shortfall between the anticipated land take-up from a jobs calculation and the actual market take up, particularly if strategic development at Omega is included. This calculation reinforces the view that historic take-up is the most appropriate method.” [EDNA 2021 paragraphs 7.83-7.84]

3.54 **Therefore, the Council’s own evidence suggests that they are planning for a level of employment land growth, at 316.26 ha, that in the past sustained 2,015 jobs annually – a figure 87% higher than the 1,078 p.a. job growth the 816 dpa SM2 housing target equates to** (according to Table 28 in GL Hearn’s Local Housing Needs Assessment Update, based on Census commuting patterns. If the 1:1 commuting pattern is applied, then the number of jobs falls to 945 per annum, an even bigger discrepancy).

3.55 It is also important to examine the employment land growth that the much lower OE and CE baselines can sustain. According to Table 44 of that report, the EDNA models the following job growth scenarios:

- OE Baseline: 12,319 net job growth. This equates to a need for 77.28 ha of employment land; and,
- CE Baseline: 17,391 jobs growth. This equates to a need for 87.61 ha of employment land.

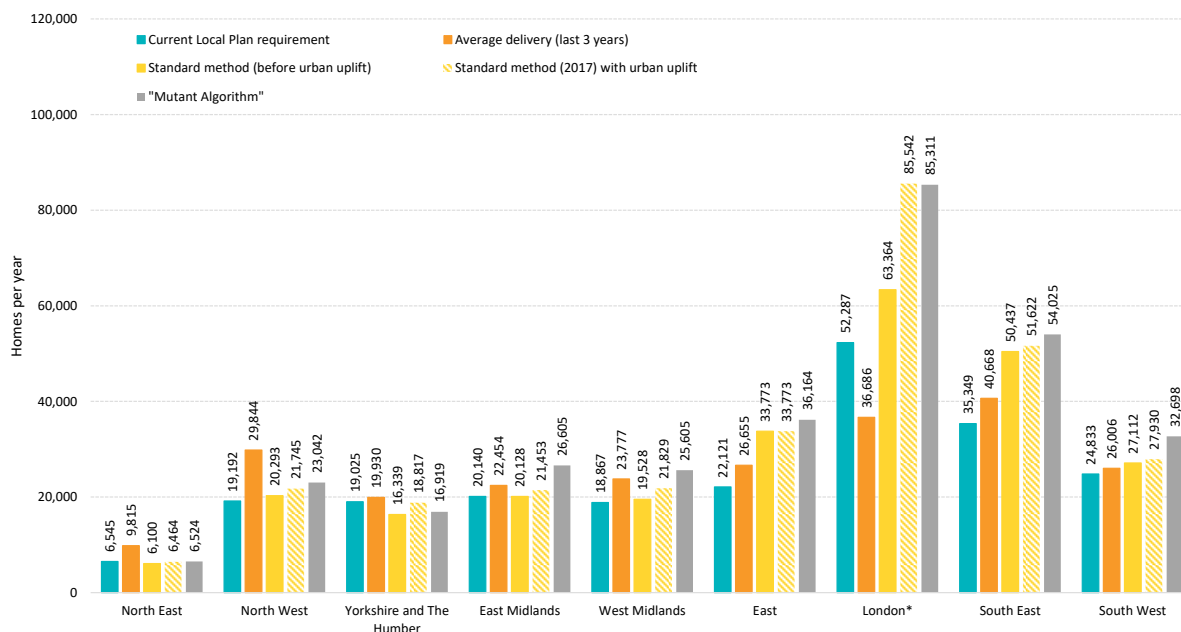
- 3.56 Unhelpfully, BE Group’s EDNA Update did not model the employment land implications either of the 816 dpa SM2 target or the mid-point OE/CE jobs growth figure of 14,855.
- 3.57 **Nevertheless, our clear conclusion is this – the Council’s employment land and housing targets are fundamentally misaligned. According to GL Hearn, the housing target of 816 dpa can sustain between 16,069 and 18,328 jobs; however, the UPSVLP’s employment land target of 316.26 ha is likely to generate at least 34,255 jobs (@2,015 per annum), a figure that is almost double the mid-point GL Hearn figure.**
- 3.58 The Consortium acknowledges that the derivation of housing need from employment land targets is a complex issue and not all of employment land need will necessarily be associated with job growth. However, this adjustment has been accounted for in the 2,015 job growth figure, and the disparity between the scale of job growth that could be sustained by 816 dpa and the employment land OAN figure of 316 ha is excessive.
- 3.59 The Consortium is of the view that to address this misalignment, the Council should plan for a much higher level of housing growth that is more closely aligned with past trend job growth and their employment land ambitions. There remains a clear disconnect between the employment land evidence and housing evidence which could lead to unsustainable outcomes including increased inward commuting and an exacerbation of the issues being experienced in the housing market.

Other Considerations

- 3.60 The UPSVLP gives the impression that local authorities must go with the standard methodology figure for LHN, and that only in very exceptional circumstances can a departure be permitted:
“The standard housing methodology defines the minimum housing requirement for a Council’s area. The updated PSVLP is proposing to meet this requirement but is no longer proposing an additional uplift, based on revised estimates of jobs creation over the Plan Period.” [Appendix 1, Council response to issues raised from representors, page 393]
- 3.61 However, the PPG clearly states that *“The government is committed to ensuring that more homes are built and **supports ambitious authorities who want to plan for growth.** The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area.”*
- 3.62 The plain truth is that it is impossible for the Government to achieve its target of 300,000 homes a year through the use of the SM2 alone; it is reliant on ambitious pro-growth districts to go above and beyond their LHN. At present, the nationwide figure is only 289,174 dpa in the highly unlikely event that every district delivers its minimum SM2 LHN. Whilst a few districts are going above their LHN figure, these are more than counteracted at present by the heavy reliance on London and the South East to see an improbable step change in delivery. This is not going to happen for the foreseeable future – London, for example, has an SM2 target of 85,542 dpa, which is an order of magnitude above the current London Plan target of 52,287 dpa and 133% above recent delivery rates (just 36,686 dpa over the past 3 years).

⁴ PPG 2a-010-20201216

Figure 3.3: LHN by Region (as of September 2021)



Source: MHCLG / Lichfields analysis

*London Plan requirement includes LLDC and OPDC, which are not reflected in individual LPA plan figures

3.63

The PPG sets out some of the circumstances whereby an area's actual need will be higher than the standard method, including (but not limited to):

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

3.64

There are several examples of growth strategies and strategic infrastructure improvements in Warrington Borough that would seem to justify an uplift to the SM2 need figure. For example, Warrington's Town Deal ambitions were boosted by the provision of £22.1 million funding in October 2020. Warrington was in the first cohort of towns eligible to bid for funding as part of the Government's Towns Fund initiative, and obtained funding for seven key projects that are intended, in the Council's own words, to unleash the town centre's potential⁵. This included:

- A health and social care academy - which will offer opportunities to build a social care workforce in Warrington fit for the future;
- A health and wellbeing hub in the town centre - which will help reduce health deprivation and improve quality of life, as well as increasing accessibility to healthcare and wellbeing services;
- An advanced construction training centre - which will develop sustainable building skills and provide an opportunity to reskill people in sectors that have declined during the COVID-19 pandemic;
- A new bus depot - which will provide the stimulus for the land on which to deliver sustainable housing;

⁵ <https://www.warrington.gov.uk/news/ps22m-funding-confirmed-part-warringtons-town-deal>

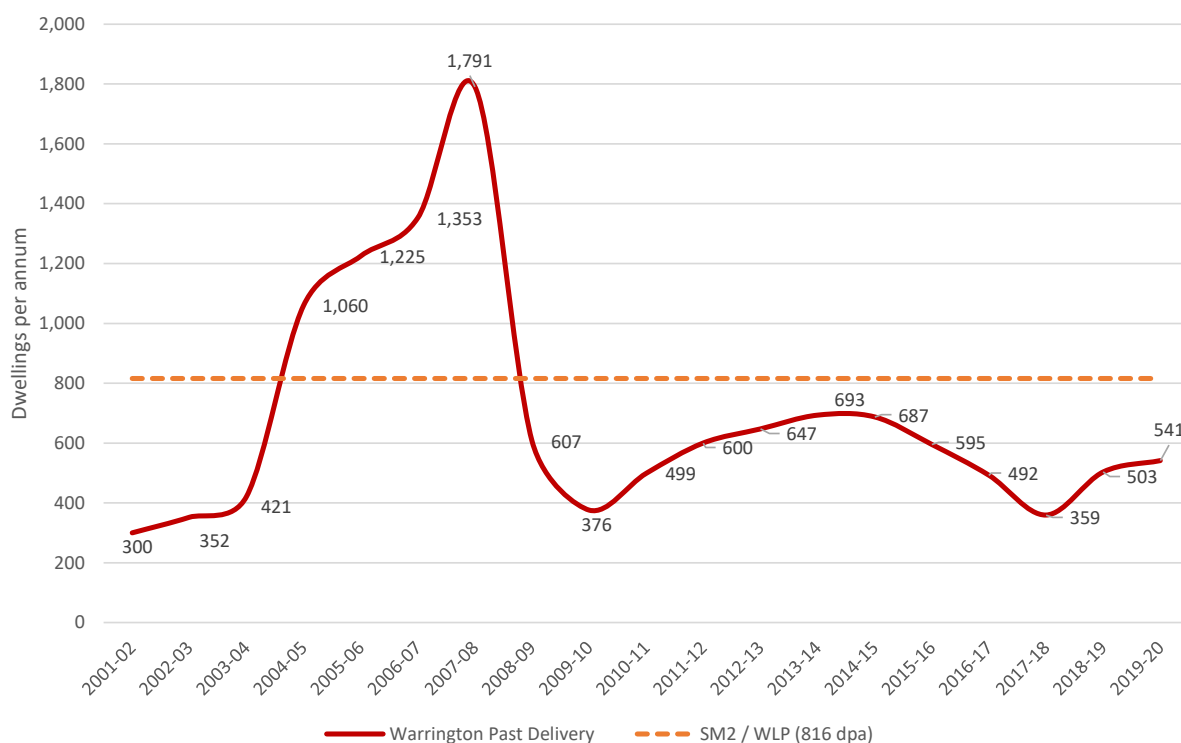
- A comprehensive active travel programme - putting in place the right infrastructure to encourage more walking and cycling throughout the town centre;
- A digital enterprise hub - which would be aimed at supporting all aspects of digital and disruptive technologies; and,
- A remastered cultural hub at the Pyramid - which will nurture the arts professionals of the future, providing a modern and flexible creative space to collaborate, produce, present and perform.

- 3.65 Similarly, to address increased traffic congestion in the Borough, the Council is committed to the delivery of the Western Link Relief Road. The Department for Transport [DfT] has awarded the Council funding to develop a business case for the new Road, and in 2019, the DfT informed the Council that the scheme had been conditionally awarded £142.5 million. The total estimated build cost is £212 million. WBC's cabinet agreed to accept this offer in 2019. A major scheme business case is now being prepared and will be submitted in late 2022⁶. This very significant investment in the Borough will help to reduce congestion and mitigate the adverse impacts of further development. It is just this type of strategic infrastructure investment that the PPG suggests is likely to drive an increase in the homes needed locally, justifying a higher housing target.
- 3.66 There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced SHMAs) are significantly greater than the outcome from SM2⁷.
- 3.67 The emerging UPSVLP is no longer proposing an additional uplift, based on the evidence contained within GL Hearn's LHN Update (2021) which we have critiqued in detail above and which we consider to be flawed. One of the points raised as justification by GL Hearn for reverting down to 816 dpa from the 945 dpa in their previous 2019 iteration is that it is "*now too high and not reflective of an achievable level of housing delivery*" [Warrington Local Housing Need Assessment 2021, paragraph 6.6].
- 3.68 In this regard, the PPG is clear that where previous housing delivery has exceeded the minimum need identified there should be a consideration of whether the level of delivery is indicative of greater housing need.
- 3.69 It is not unfair to say that in recent years, housing delivery across Warrington has generally been abject. As summarised in Table 1.1 in the Introduction, the Borough currently fails the Housing Delivery Test [HDT] by some margin, with housing delivery over the past 3 years being so poor that the 'Presumption in favour of sustainable development' now applies.
- 3.70 We do not consider that past failures should be used as justification to avoid providing the levels of housing that are so desperately needed across Warrington, and **the actions of this Consortium in advocating a need for higher housing delivery rates shows that the will is there to secure higher levels of delivery if the sites are provided.**

⁶ <https://www.warrington.gov.uk/western-link>

⁷ 2a-010-20201216

Figure 3.4: Past housing delivery across Warrington Borough, 2001-2020



Source: MHCLG Table 122 Net Additional Dwellings by Local Authority District (2021)

- 3.71 It is a fact that the longer-term net housing delivery average from 2001/02 is just 689 dpa, but that does not tell the full picture. Before the great recession in 2009, the Borough was actually delivering very high levels of homes, peaking at 1,791 dwellings in 2007/08 which is more than double the current target. Well over 1,000 dwellings were also delivered for the 3 years preceding this peak. Whilst delivery levels plummeted to just 376 dpa in 2009/10 with a sluggish recovery since then, the Consortium contends that this is not due to a lack of a desire to build new homes in the Borough, but is entirely due to the lack of available, deliverable sites in stronger market areas of the Borough.
- 3.72 The fact that Ashall Property Ltd, Barratt Developments (Barratt Homes and David Wilson Homes), Northern Trust, Satnam Developments, Story Homes, and Wainhomes all form part of this housing Consortium and are very keen to bring forward housing schemes in Warrington Borough alongside other major volume housebuilders submitting separate representations demonstrates that there is a wealth of latent demand for housebuilding in the area, and that this does not represent a justification for suppressing the need to 816 dpa.
- 3.73 Notwithstanding the considerable uncertainty from Covid-19 appears to have affected the delivery rate for several months in 2020/21, it is clear that the market for housing remains very strong in Warrington.
- 3.74 It also undermines GL Hearn’s argument that anything approaching “945 dpa is now too high and not reflective of an achievable level of housing delivery” [LHNAU paragraph 6.6], given that the Council’s own housing trajectory in Appendix 1 of the UPSVLP identifies a housing delivery rate of 1,328 in 2021/22; 997 in 2025/26; 1,485 in 2026/27; 1,414 in 2027/28 and as high as 1,972 in 2028/29. **If the Council’s own housing consultants do not consider it possible for WBC to see such high levels of housing delivery, then that must call into question the robustness of the housing trajectory and the emerging UPSVLP as a whole.**

3.75 As we can see from Table 3.2, Warrington Borough has by far the highest median and Lower Quartile house prices across the Mid-Mersey area and the North West more generally. As of September 2020, median house prices are £195,000 in Warrington, a rise of 195% since 2000. This results in a Median workplace-based Affordability Ratio of 6.27, which is also well above the 5.16 recorded in St Helens, 4.84 in Halton and 5.75 in the North West more generally. Although these figures (including the rate of change) are lower than the England and Wales average, clearly this latter figure includes London and the wider South East which skews the numbers to an extent. Similarly, Lower Quartile house prices in Warrington Borough are far higher than the comparator areas with the exception of England and Wales, resulting in an LQ workplace-based Affordability Ratio of 6.12 compared to 5.55 across the North West.

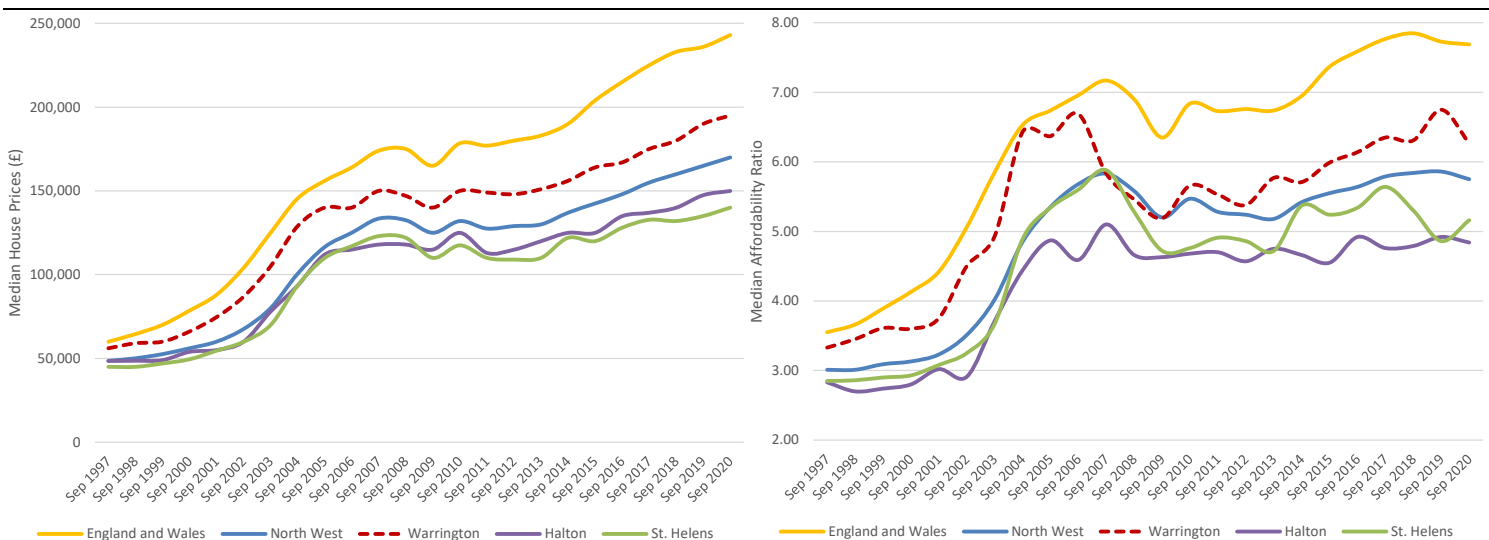
Table 3.2 Median and Lower Quartile House Prices and Affordability Ratios 2020

	Median				Lower Quartile			
	House Price		Affordability Ratio		House Price		Affordability Ratio	
	#	% Change 2000-20	#	% Change 2000-20	#	% Change 2000-20	#	% Change 2000-20
Warrington	£195,000	+195%	6.27	+74%	£137,000	+204%	6.12	+85%
St Helens	£140,000	+183%	5.16	+76%	£101,000	+189%	5.45	+101%
Halton	£150,000	+178%	4.84	+73%	£102,500	+189%	4.32	+67%
North West	£170,000	+204%	5.75	+84%	£119,448	+221%	5.55	+91%
England and Wales	£243,000	+210%	7.69	+86%	£160,000	+208%	7.01	+84%

Source: ONS (March 2021): Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2020

3.76 Figure 3.5 demonstrates how strongly Warrington Borough’s median house prices have increased in recent years, and how this has impacted on people’s ability to afford them. Interestingly, there has been a dip in the AR for 2020, declining from 6.75 in 2019 to 6.27, although this appears to be due to an unusually high spike in median earnings for that year, which increased from £28,145 in 2019 to £31,094 in 2020 – an increase that was higher than the past 12 years’ growth put together (which could suggest that this was an anomaly). Median house prices continue to creep upwards in Warrington at a fast pace.

Figure 3.5 Comparison of Median House Prices and Affordability Ratios over time



Source: ONS (March 2021): Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2020

3.77 Furthermore, the UPSVLP actually acknowledges that affordability is a serious issue in the Borough and that the Plan needs to have a specific long-term plan to address it – which it does not:

“Affordability issues are linked to suppressed household formation rates and this is a particular problem for young people and young families. This is becoming an increasingly urgent issue which the Local Plan aims to tackle for the longer term.” [paragraph 2.1.39]

3.78 The Consortium firmly believes that Warrington has a strong residential market which is ready and able to absorb much higher quantities of housing than the 816 dpa currently proposed. Consideration should therefore be given as to whether delivering housing higher than the current LHN is appropriate.

The Northern Powerhouse and Levelling Up Agendas

3.79 The Northern Powerhouse is the Government’s vision for a super-connected, globally competitive northern economy (covering all 11 northern LEPs plus North Wales) with a flourishing private sector, a highly skilled population and world-renowned civic and business leadership. The Government re-asserted its support for the Northern Powerhouse through the publication of the Northern Powerhouse Strategy which coincided with the Chancellor’s Autumn Statement in November 2016. The published Strategy aims to unleash the economic potential of the North by improving connectivity both within and between towns, counties and city regions; addressing the disparity in skills between the North and some other parts of the country; ensuring the North is an excellent place to start and grow a business; and promoting trade and investment across the North [§1.2].

3.80 In this regard, Warrington is clearly a key driver of growth for the Northern Powerhouse – it is economically strong, politically advanced and highly accessible by road and rail. As set out on Warrington & Co’s website, the Borough has access to a 2.5 million strong workforce and 2 international airports within a 30-minute drivetime; has 98% superfast broadband coverage and £170 million in highway investments between 2015 and 2021. It also contains a number of prominent European and UK Headquarters including companies such as United Utilities, Electricity North West, MHI Vestas Offshore Wind UK, Sellafield Ltd, Nuvia UK, New Balance, Sonova UK, Cavendish Nuclear, European Metal Recycling and Certas Energy⁸. As part of the wider Cheshire and Warrington LEP area, which is one of the most productive in the country outside London and the South East, Warrington is exceptionally well placed to benefit from the Government’s future investment programme.

3.81 The Northern Powerhouse has now arguably been subsumed within the Government’s ‘Levelling Up’ agenda, which was first raised in Boris Johnson’s first speech as Prime Minister, and subsequently addressed in the Conservative Party’s 2019 election manifesto. This pledged *“to use our post-Brexit freedoms to build prosperity and strengthen and level up every part of the country”*, through specific measures such as investing in towns, cities, and rural and coastal areas; giving those areas more control of how investment is made; levelling up skills using apprenticeships and a £3bn National Skills Fund; and creating up to 10 freeports to help deprived communities. Similarly, the 2021 Queen’s Speech stated that the Government will *“level up opportunities across all parts of the United Kingdom, supporting jobs, businesses and economic growth and addressing the impact of the pandemic on public services.”*

3.82 Levelling up is therefore designed to address the longstanding problem of the UK’s regional economic disparities⁹. The Levelling Up Fund was announced in the 2020 Spending Review last November. This stated the fund would be worth £4.8 billion, with £4 billion of this to be spent

⁸ <https://warringtonandco.com/economy>

⁹ House of Commons Library (11th June 2021): The Levelling Up Agenda

in England and £0.8 billion to be spent in Scotland, Wales and Northern Ireland. The Government has developed a methodology to help the Fund deliver its core objective of improving local communities by investing in local infrastructure that has a visible impact on people. Warrington is in the second priority tier deemed in need of investment through this Fund.

3.83 **Warrington is therefore well placed to act as the driving force behind the Northern Powerhouse and also to attract Levelling Up Funding from Government.**

3.84 The Borough's economic advantages are described at length in the UPSVLP:

“This connectivity has enabled the Borough to develop a strong and resilient economy with the town constituting a significant centre of employment in the North West, and being widely recognised as a key driver and contributor to the North West's economy and a key driver of growth for the UK generally. Warrington is one of the most successful towns in the UK today in terms of economic development, investment, employment rates and growth and over the last ten years has repeatedly been recognised as such in national research and league tables such as the Centre for Cities ‘Cities Outlook’.” [§2.1.7-2.1.8]

3.85 However, the UPSVLP as it stands will fail to build on this promise and does not embrace the spirit of growth, investment and regeneration represented in the Northern Powerhouse strategy and Levelling Up Agenda. If Warrington is to underpin the ‘Northern Powerhouse’ driving growth and reducing national inequalities as envisaged by the Government, the emerging UPSVLP will need to be more pro-active in supporting economic growth and provide a clear vision for boosting housing requirements with a focus on how new infrastructure is likely to support business growth and attract new people to the Borough. At present its entire strategy appears to rely upon older workers staying in the local job market long after retirement.

3.86 Insufficient, unaffordable and poor-quality housing in Warrington does not just impact on its residents; it also acts as a disincentive to companies looking to invest in the area. Many businesses regard the housing crisis as a major threat to their competitiveness. In a 2018 CBI London Business Survey¹⁰, two thirds of businesses reported that housing costs have a negative impact on the recruitment of staff at entry level. The UPSVLP risks a similar situation developing in Warrington whereby companies struggle to recruit and retain talented graduates and more senior employees, negatively impacting on the overall attractiveness of the region and potentially resulting in investment going elsewhere.

3.87 Given ongoing economic uncertainty it is vital that the UPSVLP provides a robust and flexible development strategy that boosts housing growth significantly to support new, highly skilled jobs and stimulate investment. A failure to do so risks further pressure on house prices and increased polarisation of society. The UPSVLP should not suppress the housing delivery that is essential to sustain Warrington's economic growth.

Affordable Housing Need

3.88 The PPG summarises the approach that should be taken to analysing affordable housing needs. It clearly states that the resultant affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments:

¹⁰ <https://www.cbre.com/-/media/cbre/countryunitedkingdom/documents/cbi-cbre-lbs-2018.pdf>

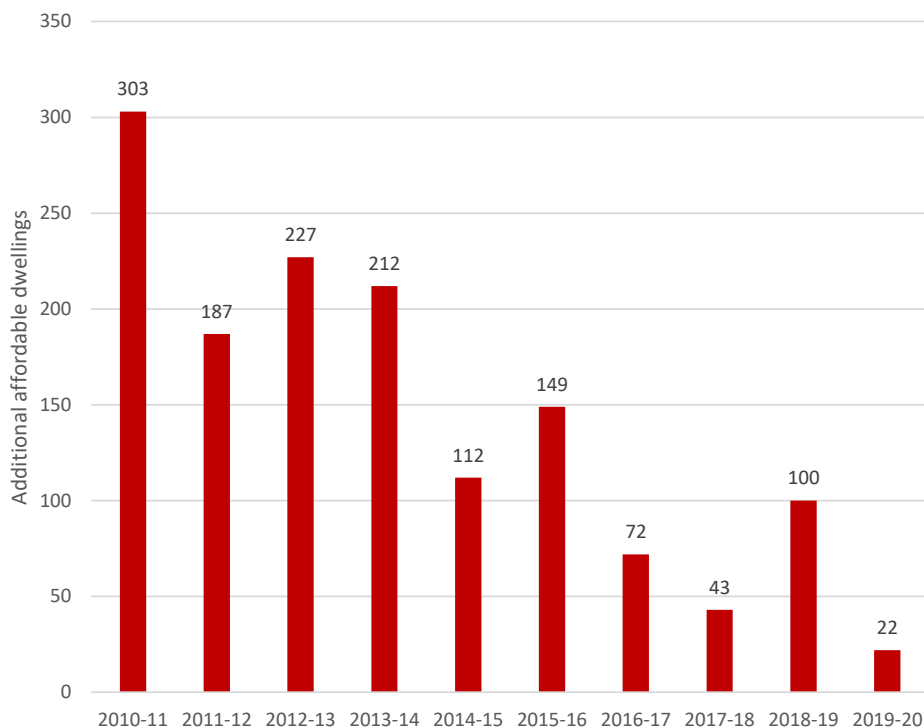
"The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."¹¹

- 3.89 The reference to uplifting the housing figures in the Plan to help deliver affordable housing need suggests that this is a component part of the calculation of the housing requirement, rather than the LHN.
- 3.90 The NPPF says that local authorities should assess the size, type and tenure of housing needed for different groups in the community and reflect this in planning policies (including, but not limited to, those who require affordable housing) [§62]. In the years since the NPPF was first introduced, it has been established through numerous local plans and in caselaw that affordable housing needs represent a strong influence in determining housing need, even if they are not necessarily met in full (this is often the case as affordable housing need can represent a high proportion, or even exceed, the overall housing need).
- 3.91 The latest update to the Warrington Local Housing Need Assessment (August 2021) identifies a very high level of affordable housing need, equal to 423 dpa, having risen from 377 dpa in the 2019 study (an increase of 14.9%).
- 3.92 Although the LHNAU accepts that this is a high level of need which suggests that the Council is justified in seeking to secure additional affordable housing across the Borough, it also takes great pains to suggest that these final figures are not targets for affordable housebuilding but a check to understand likely future demand. To head off the arguments set out above, it states that *"this does not in itself provide justification for an increase in the HNF to address affordable housing need. It is important to note that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise."* [§1.47-1.48]
- 3.93 The LHNAU is right to suggest that the relationship between affordable housing need and how this translates to overall housing need is not straightforward; however, to suggest that it can play no part in determining the overall housing requirement is patently false. Clearly one very obvious way of boosting affordable housing delivery would be to allocate more deliverable greenfield housing sites in strong market locations that are capable of providing high levels of social housing as part of s106 agreements.
- 3.94 The UPSVLP accepts that increasing the delivery of affordable housing across the Plan area should be a priority, and it will be essential that new residential developments play a full role in supporting this:
- "The NPPF makes it clear that affordable housing should be provided on major residential schemes and not minor developments (under 10 homes). The policy requires that 30% affordable housing is provided in the majority of Borough, excluding brownfield sites in inner Warrington and the Town Centre where required provision is lower at 20%. This recognises the lower level of viability in Inner Warrington in accordance with the Local Plan Viability Assessment (2021)."* [§4.1.36]
- 3.95 Even if 30% of WBC's entire housing target of 816 dpa were to come forward as social housing, this would only equate to 245 dpa, or 4,406 dwellings over the 18-year plan period. This is only 58% of the identified requirement.

¹¹ ID: 2a-024-20190220

3.96 According to Figure 3.6, since 2010/11 the number of affordable housing completions has dropped dramatically, from a peak of 303 in 2010/11, to a very disappointing 22 units in 2019/20. With an average delivery rate of 143 net additional affordable homes over the past ten years, the 423 dpa need identified in the LHNAU looks entirely unachievable if the status quo persists.

Figure 3.6: Additional affordable housing completions in Warrington Borough 2010-2020



Source: MHCLG Table 1008C: Total additional affordable dwellings provided by local authority area – Completions (2021)

3.97 Bearing this in mind, it is highly problematic that WBC has not considered increasing the overall housing target and identifying additional deliverable sites in strong market areas of the Borough in an attempt to boost affordable housing provision.

Conclusion and Recommendations

3.98 The Consortium considers that the LHN derived from the Government's SM2 should only be the starting point for determining WBC's housing target, and there are clear and indisputable arguments to go significantly higher. The decision by the Council's housing consultants to abandon the previous alignment with jobs growth is unfounded and supported by a flawed evidence base. In particular, the misalignment with current economic growth, and specifically employment land objectives, means that the Plan is fundamentally unsound and its evidence misaligned.

3.99 Warrington's historically pro-growth agenda and the high levels of housing delivery that were once a badge of civic pride have long since been abandoned. It is now one of the poorest performing Councils in North West England based on the Housing Delivery Test, yet no effort is being made to boost delivery to help fulfil the Government's Levelling Up agenda.

3.100 Furthermore, the very high levels of affordable housing need across the Borough, which could justify an uplift to the housing requirement, have been ignored yet again despite the High Court quashing the housing policies of Warrington's current adopted Core Strategy back in 2015 partly

because WBC had failed to accurately consider whether an increase in the total housing figure included in the UPSVLP could help deliver the required number of affordable homes¹².

- 3.101 Although the housing market is complex and can be impacted by macro-economic factors as well as Government policy intervention, it is accepted that increasing the supply of housing assists in suppressing worsening affordability issues. Although it is not the only solution, it is clearly a very important one and one that WBC has most control over. Housing land availability and, by extension, housing supply in Warrington has been restricted and constrained for a number of years by the tightly drawn Green Belt boundaries across the Borough and the lack of a positively prepared and up-to-date plan that identifies sufficient land to meet needs has certainly been a contributing factor to the long-term trend of worsening affordability.
- 3.102 It is worth bearing in mind that the standard method figure is predominantly based on official household projections which are trend-based and effectively 'lock in' trends in constrained household formation over the past number of years. Limiting the supply of land through failing to prepare its Local Plan and updating it on a regular basis has constrained the ability of Warrington families to become homeowners.
- 3.103 Although the standard method does apply a modest uplift based on the affordability issues of the authority at the time, it does not take into account worsening trends over time, hence a more significant uplift should be applied and a high housing requirement pursued which is not backloaded. This could also be justified on the basis of the Council's economic growth ambitions as exemplified in its very high employment land target, its significant Town Deal ambitions and the strategic infrastructure investment proposed through the delivery of the Western Link Relief Road.
- 3.104 **The result is an entirely unsatisfactory situation and the Consortium requests that the target is revisited and robustly adjusted upwards to ensure the Plan can be found sound.**

¹² Satnam Millennium v Warrington Borough Council (February 2015). EWHC370

4.0 Housing Need Assessment

Introduction

4.1 The Government is clear that the figure derived by the LHN target is intended to be a minimum figure, with justifications to go below this relating to environmental or policy constraints rather than issues over the reliability of the household projections:

“Local housing need does not represent a mandatory target – it is simply a starting point for planning, and local authorities may either choose to plan in excess of this or to conclude that they are not able to meet all housing need within their boundaries, for example due to constraints such as protected designations and Green Belt, or whether that need is better met elsewhere. This means there is flexibility for local authorities to manage movements in local housing need locally.”¹³

4.2 The PPG sets out that there will be circumstances when a higher figure than that generated by the standard method might be considered. This is because the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

4.3 Circumstances which might justify an uplift include where¹⁴:

- *“growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.*

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”

4.4 In particular, the latest version of the NPPF is quite clear that when planning for housing and employment land, the approach should be an integrated one:

“Planning policies should (inter alia):

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment” [paragraph 82 c]

4.5 This is re-iterated later in the document:

“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should (inter alia):

¹³ Ministry of Housing Communities and Local Government [MHCLG] (October 2018): Technical consultation on updates to national planning policy and guidance, page 13

¹⁴ PPG Reference ID: 2a-010-20201216

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.” [paragraph 93 e]

- 4.6 Given the flaws in the GL Hearn housing need evidence base and the clear failure to even attempt to model a scenario that approximates to the Council’s own employment land strategy (with the provision of 316.26 ha of employment land), Lichfields has intervened to model a range of scenarios using industry standard PopGroup demographic modelling software. The detailed assumptions utilised in the modelling can be found in Appendix 1.

Lichfields’ Modelling Methodology

- 4.7 The following scenarios have been considered. The starting point remains the baseline scenario (A), with various data variables and assumptions applied for each of the subsequent scenarios for the period 2021 to 2038/2039 as follows:

- **Scenario A: Standard Method** – based on the Government’s LHN standard methodology as of September 2021 and incorporating the 2014-based Sub-National Household Projections [SNHP] (816 dpa);
- **Scenario B: MYE Baseline 2014** – a scenario utilising the 2014-based SNPP and headship rates from the MHCLG 2014-based SNHP, incorporating the latest 2020 Mid-Year Population Estimates [MYE] to adjust the starting point for the latest population position;
- **Scenario C: Experian September 2021 job projections.** These indicate that over the plan period 2021 to 2038 there will be a net workforce job growth of 7,900, increasing to 8,500 by 2039;
- **Scenario D: Employment Land OAN** – the emerging UPSVLP has an employment land target of 316.26 ha. This is derived from the 2021 EDNA, which bases this figure on trending forward past take up rates of B-Class employment land of 14.22 ha per annum (including Omega) over 18 years, plus a 3 year flexibility margin ($14.22 \times 21 = 298.62$), plus a 17.64 ha displacement allowance. The 14.22 ha past take up was derived from the average completions that were delivered in the Borough over the time period 1996/97 to 2019/20 (341.29 ha in total). Table 39 of the EDNA tests how closely employment change translates to land take-up. It indicates that over the time period when 14.22 ha per annum was delivered, there was a net growth of 48,350 jobs, or 2,015 per annum over 24 years. If a similar trend is observed going forward, this could indicate that over the period 2021-2038 there could be a net **increase of 36,265 net job growth by 2039 (34,250 by 2038)** that could be sustained by 316.26 ha of employment land (recognising that at least a half, and perhaps more, of these jobs are likely to be based on non-commercial/industrial land). This 36,265 jobs figure was modelled in PopGroup.
- **Scenario E: OE 2021:** Table 22 of the Warrington LHNAU states that job growth based on the Oxford Economics’ 2021 projection equates to 12,319, or 725 p.a. at a Compound Annual Growth Rate [CAGR] of 0.48% to 2038 (13,045 to 2039);
- **Scenario F: CE 2021:** Table 22 of the Warrington LHNAU states that job growth based on the Cambridge Econometrics’ 2021 projection equates to 17,391, or 1,023 p.a. at a Compound Annual Growth Rate [CAGR] of 0.65% to 2038 (18,414 to 2039).

Modelling Results

- 4.8 The scenarios use components of population change (births, deaths and migration) to project how the future population, household composition and consequent need for housing will support future employment growth. All scenarios have an adjustment for accelerating household formation rates based on a similar theoretical approach as GL Hearn adopted in their

previous 2019 LHNA. Alternative scenarios have been tested to reflect partial catch-up [PCU] scenarios whereby the household formation rate of males and females aged between the ages of 15 and 34 increase gradually between 2020 and 2030 to a point so that it reflects 50% of the difference between the 2014-based SNHP rates and the 2008-based SNHP rate. 2008-based figures were selected on the grounds that they largely replicate the longer-term trend and do not suffer from the ‘recency bias’ that has infected subsequent projections or the change in methodology that has served to reduce the 2016- and 2018-based projections in particular. The use of the 2014-based projections reflects the Government’s Standard Methodology approach.

- 4.9 A full breakdown of the detailed methodological inputs for each scenario is presented in Appendix 1.
- 4.10 The headline results for each scenario are set out in the tables below. Table 4.1 presents the results up to 2038 to enable direct comparisons to be made with the GL Hearn modelling. Table 4.2 presents an 18-year forecasting period to 2039 to align with the emerging UPSVLP.

Table 4.1 Outputs – Demographic / Economic Scenarios for Warrington Borough, 2021-2038

Scenario	Change in Population	Change in Jobs	Change in Households	Dwellings 2021-2038			
				Total Change	DPA	DPA PCU	GL Hearn dpa
Scenario A: 2014-based SNPP	17,265	4,935	11,225	11,501	677	716	n/a
Scenario B: MYE Baseline 2014	16,062	2,905	10,567	10,827	637	676	n/a
Scenario C: SM2 816 dpa	24,573	9,902	13,872	13,872	816	n/a	816
Scenario D: Employment Land OAN	55,300	34,248	25,831	26,466	1,557	1,607	n/a
Scenario E: OE 2021	27,950	12,320	15,193	15,566	916	958	n/a
Scenario F: CE 2021	34,274	17,391	17,652	18,086	1,064	1,108	
Scenario G: Midpoint OE/CE	31,115	14,858	16,424	16,828	990	1,033	696 / 765

Source: Lichfields using PopGroup

Table 4.2 Outputs – Demographic / Economic Scenarios for Warrington Borough, 2021-2039

Scenario	Change in Population	Change in Jobs	Change in Households	Dwellings 2021-39		
				Total Change	DPA	DPA PCU
Scenario A: 2014-based SNPP	18,062	5,534	11,773	12,063	670	707
Scenario B: MYE Baseline 2014	16,810	3,305	11,016	11,287	627	663
Scenario C: SM2 816 dpa	26,263	11,048	14,688	14,688	816	n/a
Scenario D: Employment Land OAN	58,247	36,263	27,139	27,807	1,545	1,592
Scenario E: OE 2021	29,168	13,045	15,827	16,216	901	940
Scenario F: CE 2021	35,892	18,414	18,443	18,896	1,050	1,091
Scenario G: Midpoint OE/CE	32,534	15,732	17,136	17,558	975	1,016

Source: Lichfields using PopGroup

- 4.11 The findings of the 3 demographic scenarios are broadly in line with those reported in the LHNAU. Scenario C, the standard method, is based on incorporating the 2014-based SNHP alongside the 2014-SNPP into the model. This represents household growth of 143,872 over the period 2021-2038, or 816 hpa. Incorporating an uplift of 14.19% due to a median Affordability Ratio of 6.27, equates to the SM2 figure of 816 dpa. However, when robust assumptions

regarding unemployment rates, economic activity rates (based on the latest OBR figures) and a robust commuting ratio are applied, it is considered that this level of housing delivery would only be sufficient to support 9,902 jobs growth in Warrington Borough to 2038, rising to 11,048 by 2039, well below the additional 14,855 jobs modelled by GL Hearn as their mid-point OE/CE scenario (to 2038).

- 4.12 Without the affordability ratio uplift, and relying on the 2014-based SNHP alone, the housing needs associated with Scenarios A and B are much lower, with the latter particularly so given the lower MYE starting point of 209,397 residents living in the Borough as of 2020, compared to the 214,615 residents estimated for that year in the 2014-based SNPP.
- 4.13 As for the employment-led scenarios, GL Hearn's LHNAU worked on the basis of taking a mid-point of the OE/CE job growth figures, equal to 14,855, which they calculated equated to a need for between 696 dpa and 765 dpa, depending on whether the Census commuting (0.877) or 1:1 (1.0) commuting were applied. Lichfields has sought to replicate this scenario using a Labour Force ratio¹⁵ which has been increased gradually from the figure of 0.7155 for 2020 to the past average figure of 0.7315 and then held constant.
- 4.14 The closest scenario to GL Hearn's preferred economic growth scenario is Lichfields' Scenario G, which represents the midpoint of the OE/CE projections. This indicates a net job growth of 14,858 over the 17 years to 2038, rising to 15,732 if the period is extended to 2039 to align with the emerging UPSVLP. Our modelling indicates that to 2038, this would require an additional 31,115 residents from the 2021 position, equating to 16,424 additional households, and 16,828 dwellings. This equates to 990 dpa, rising to 1,033 dpa if the accelerated household formation rates are applied. By way of comparison, the GL Hearn modelling suggests that this level of job growth can somehow be accommodated by a growth in housing of between 696 and 765 dpa, depending on the commuting assumptions applied.
- 4.15 Our view is that the GL Hearn assumptions that relate to the midpoint OE/CE scenario, which guided them to state that the SM2 figure of 816 dpa could comfortably accommodate realistic job growth levels over the Plan period, are patently flawed. This relates in part to the erroneous assumption that a 'latent labour supply' of 4,101 residents can be factored into the workforce over the period 2021-2038 as discussed in detail in Section 3.0. Furthermore, there is no explanation as to why GL Hearn has decided to move away from applying the accelerated household formation rate assumption that they were happy to apply in their 2019 version of the LHNA.
- 4.16 **If the Plan period is extended to 2039 to align with the 18-year emerging Plan, then the housing requirement falls slightly to 975 dpa, or 1,016 dpa with the PCU household formation rate included. This is still well above the Council's 816 dpa UPSVLP target.**
- 4.17 Our view is that if the Council is to plan robustly for economic growth - as it did in the previous version of the Local Plan - then **a housing requirement of 1,016 dpa is the minimum it should be planning for.** This is more closely in line with the 945 dpa target that was proposed in the previous March 2019 WLP submission version draft, which addressed prospective economic growth prospects.
- 4.18 Ideally, the Council should ensure that the housing target aligns with its employment land target. We can see from the Tables above that there is absolutely no chance that 816 dpa can sustainably accommodate the increase in workforce that would be associated with 316 hectares

¹⁵The Labour Force Ratio reflects the relationship between the number of jobs and number of employed people in a local area. This takes account of commuting, unemployment and double-jobbing. Employment figures were taken from Experian, unemployment rate obtained from NOMIS. Data on economically active population taken from NOMIS and reflects the figure for all those over the age of 16. Data for each metric was obtained for the period between 2012 and 2020.

of employment land. Based on the Council's own evidence base (BE Group's 2021 EDNA Update), the 316 ha of employment land could be expected to align with a level of job growth equal to over 36,260 – more than triple the level realistically associated with 816 dpa. The actual housing target that could robustly accommodate this level of job growth would range from 1,545 dpa to 1,592 dpa by 2039, depending on whether PCU rates are applied.

4.19 As we demonstrate in Section 3 above, Warrington Borough has only delivered this number of dwellings on one occasion over the past 19 years, and it would seem a step too far to expect the Council to consistently meet a target at almost 1,600 dpa, a target which it will not, realistically, have a hope of achieving.

4.20 Our view is therefore that a (rounded) target of 1,015 dpa should be taken forward in the UPSVLP, which aligns with the mid-point economic growth, adjusted for PCC rates. This was the approach formerly taken forward by its housing consultants in GL Hearn in 2019, with no robust justification for departing from it and some very clear errors in their latest update which invalidates the conclusions of their 2021 study. Given that this still does not align fully with the Council's very ambitious employment land target, this figure could legitimately be increased (which would also more closely align with the affordable housing need of 423 dpa, which, at 30%, would equate to 1,410 dpa). The 1,015 dpa would meet over 70% of the total affordable housing need if 30% of all units came forward as social housing.

4.21 **To summarise, our view is that the employment-led housing need for Warrington Borough is 1,015 dpa, which is more closely aligned with the Council's previous 2019 target, would address realistic economic growth targets and help to deliver over 70% of its affordable housing need.**

5.0 Backloading the Need

- 5.1 The country is facing a national housing crisis. Nationwide, median house prices, which are worth on average almost quarter of a million pounds, are now 7.84-times earnings¹⁶. Warrington Borough is certainly not immune from this trend, with median house prices as high as £195,000 as of September 2020 – the 8th highest in the North West / North East of England - and an associated affordability ratio of 6.27. The emerging Plan accepts that affordability has been worsening in recent years as a result of a dwindling supply of housing land. As a result, *“The town is also encountering housing affordability issues, with this being a particular problem for younger people and young families.”* [§7.22]
- 5.2 The UPSVLP recognises the affordability risks associated with failing to meet the Borough’s development needs in full: *“Not planning to meet development needs could also worsen the affordability of housing, particularly for young people and could constrain Warrington’s future economic prosperity.”* [§9.2]
- 5.3 To help address this, the NPPF states that *“it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”* [§60]
- 5.4 However, the UPSVLP’s approach is not to bring forward housing as quickly as possible to help address Warrington’s failing housing market – in fact it recommends the exact opposite, adopting a phased approach to delivering housing that actually delays higher levels of housing delivery until the end of the plan period. Table 7.2 of the UPSVLP sets out that for the first 4-year tranche to 2025, just 8,732 dpa would be delivered, against an LHN of 10,305 dpa. This is a shortfall of 1,573 dpa, or 6,292 homes in total.
- 5.5 Policy DEV1 - Housing Delivery, states that:
“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.
Should monitoring indicate that a 5-year deliverable and / or subsequent developable supply of housing land over the Plan Period can no longer be sustained, the Council will give consideration to a review or partial review of the Local Plan.”
- 5.6 The supporting text to this Policy claims that the need to release Green Belt land and the lead-in times for the infrastructure required to support the larger allocation sites means that there will be a relatively lower level of housing delivery in the early years of the Plan Period, with housing delivery increasing over time:
“The Council is therefore proposing a Stepped Housing Requirement. The housing requirement over the first 5 years will be 678 dpa. This will match deliverable supply over this period when the 20% buffer is added. The requirement over the remaining 13 years of the Plan, will increase to 870 dwellings per annum. This will ensure the overall requirement of 14,688 is met. The Government’s planning guidance recognises that such an approach is appropriate where strategic sites such as those being proposed by the Council will have a phased delivery or are likely to be delivered later in the plan period.” [§4.1.20 and §4.1.21]

¹⁶ ONS (2021): Median house price by country and region, England and Wales, year ending September 1997 to year ending September 2020 (£)

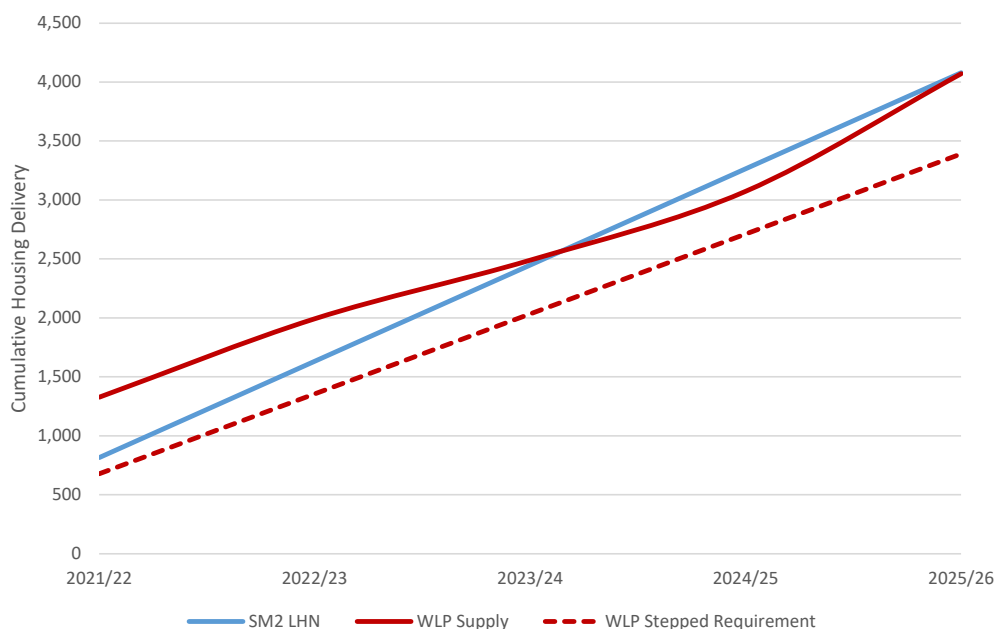
5.7 A pedantic point is that the incorrect PPG reference is made (the stepped housing discussions is now found in paragraph 68-021-20190722, not paragraph 34 as referenced in paragraph 4.1.21 of the UPSVLP). It is worth reproducing the relevant PPG paragraph in full:

*“A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. **Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs.** Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, **strategic policy-makers should ensure there is not continued delay in meeting identified development needs.**” [PPG 68-021-20190722, Lichfields’ emphasis]*

5.8 Whilst it is acknowledged that Warrington has some larger strategic sites on Green Belt land that may come forward in the Plan, this should not be used as an excuse to postpone meeting households needs in full. It is quite clear that Warrington’s approach of backloading the housing land supply towards the end of the Plan period is aimed squarely at ensuring it can demonstrate a 5YHLS upon adoption to help defend appeal situations – its current (object) 3.4 year housing land supply position¹⁷ is not one that merits reward.

5.9 Figure 5.1 indicates that the Council considers it can deliver 814 dpa over the first 5 years, but that by manipulating the need down to an untested 678 dpa, it can erroneously claim it has factored in a 20% buffer to the supply, thus avoiding the 5YHLS hurdle it would otherwise fail. This cannot be a satisfactory state of affairs, given that the Council has delivered on average just 562 dpa over the past 10 years¹⁸ and fails the Housing Delivery Test by a greater margin of any Council in northern England (with the exceptions of Calderdale and Bury).

Figure 5.1 Implications of backloading the Housing Delivery for Warrington Borough for the first 5 years of the Plan



Source: UPSVLP Plan (2021) Appendix 1 Housing Trajectory/ Lichfields Analysis

¹⁷ Appeal Ref: APP/M0655/W/21/3271800, New House Farm, Hatton Lane, Hatton, Warrington, Inspector’s Decision (dated 22nd September 2021) paragraph 54

¹⁸ MHCLG (2021): Table 122, Net additional dwellings1 by local authority district, England, 2001-02 to 2019-20

- 5.10 The impact of the pandemic has been unprecedented, and the three lockdowns have clearly had some impact on delivery targets in 2020, which is reflected in the Government’s adjustments to the HDT for 2020 (effectively deducting 4 months of need from the calculation). However, there is no indication that this will suppress housing delivery over the next 4 years, quite the opposite in fact. The soaring property prices throughout the pandemic, which continue at the time of writing, have exceeded all expectations. They show no sign of slowing down even after the end of the stamp duty holiday, with Covid-related changes in households’ priorities driving a strong demand for larger family properties in particular. Nationwide recently reported that UK house prices rose 13.4% in the year to June 2021, the fastest pace since November 2004¹⁹. There has arguably never been a better time to deliver housing to meet unmet demand; actually, restricting housing supply will have a disastrous effect in Warrington.
- 5.11 To address the Council’s point that “*such an approach is appropriate where strategic sites such as those being proposed by the Council will have a phased delivery or are likely to be delivered later in the plan period*”, it has already banked 580 units on Green Belt sites in the first 5 years of the Local Plan, which would undermine any argument that the provision of a range of additional reasonably-sized Green Belt allocations could not be included in the 5YHLS to meet the very pressing housing needs of the Borough.
- 5.12 Fiddlers Ferry Power Station can, according to the Council, start delivering homes in the first 5 years of the Plan; the problem is a failure to provide additional housing land that are readily available, with the peculiar inclusion of certain sites (see for example Stockport Road) which cannot bring forward any homes in the Plan period.
- 5.13 Whilst the masterplanning and infrastructure investments required to support the development of some sites, including many of the allocations in the Plan, means that they may only produce large numbers of new dwellings in the latter phases of the plan period, this does not apply to all of them and some will undoubtedly be able to deliver homes quickly once the Plan is adopted.
- 5.14 Bizarrely, Warrington Council goes on to argue that by providing the minimum starting point housing land target, affordability will cease to be an issue in the years to come:
“In providing a positive plan for growth and based on the principles underpinning the Government’s standard housing method, the Council considers that by the end of the Plan period, house price affordability will no longer be a significant issue in Warrington. In considering the period beyond the end of the Plan, the Council has therefore assumed that no further affordability uplift will be required.” [§4.1.27]
- 5.15 This approach does not align with the Government’s imperative for high levels of housing, to be delivered as soon as possible, to address the housing crisis:
“Our plans for a simpler and faster planning process need to be accompanied by a stronger emphasis on the faster delivery of development, especially for Growth areas where substantial development has been permitted. If local communities through the new Local Plan process have identified sites for substantial development over the next ten years and developers have secured planning consents, there should be a presumption that these sites will be built out quickly.” [Planning for the Future, §2.58]
- 5.16 This approach is therefore completely at odds with the Government’s requirement to deliver the homes that are needed as soon as possible. Thousands of Warrington households are in acute housing need now. They cannot be waiting ten years or more for housing to be delivered – this will result in rapidly increasing house prices, worsening affordability, homelessness and poverty. The need for new housing is now.

¹⁹ <https://www.bbc.co.uk/news/business-57648935>

- 5.17 The supply buffer of 14% is too small, and the failure to provide any safeguarded land as required by the NPPF when Green Belt releases are factored into the delivery trajectory further undermines the robustness of the Council’s strategy. In fact, almost three quarters of the 1,988 ‘over supply’ factored into the trajectory actually comprises 1,458 units from unspecified ‘windfall’, or small sites allowance which are projected to continue at a steady 81 units every year.
- 5.18 As we have set out in detail in our accompanying Housing Land Supply Technical Note, windfall sites do not represent a guaranteed supply of housing sites. Warrington Council has been relying on a finite supply of sites for a number of years in the absence of an up-to-date Local Plan, a lack of allocated land for housing and tightly defined Green Belt boundaries around settlements. The Council has little influence over the location of windfall sites and the size and type of property. As such, overly relying on windfall sites will result in the Council having limited influence on the location or type of dwellings coming forward and how that aligns with the objectives set out in the Local Plan, particularly the delivery of 20% affordable dwellings in Inner Warrington and 30% elsewhere in the Borough (as set out in Policy DEV 2 – Meeting Housing Needs).
- 5.19 The most appropriate solution is therefore the identification of smaller, more sustainable and deliverable Green Belt allocations which can assist in meeting the housing needs in the first few years of the Plan.
- 5.20 The Consortium considers that an appropriate response would be to **identify additional land and increase the housing requirement in the early years of the Plan** to increase flexibility and safeguard against any issues faced by the deliverable sites identified in the supply. The Council previously identified a number of sites that were appropriate for release from the Green Belt in the previous version of the plan that can simply be reallocated. However, the phasing of the supply in the UPSVLP bears no resemblance to this rational response and in fact recommends the polar opposite.
- 5.21 The concluding argument goes to the Planning Advisory Service’s Good Plan Making Guide²⁰, which says:
- “The local plan should contain a housing trajectory, or provide a Housing Implementation Strategy in the evidence base (sometimes this is combined with an Infrastructure Delivery Strategy). This is used to demonstrate housing delivery against housing need. Some authorities are seeking to “backload” their housing trajectories citing the poor housing market as a reason for doing so. However, the point about the trajectory is that it should relate to housing need. **There is little point in planning to provide additional housing in the latter part of the plan period if the need is for housing in the early plan period.** Thus to be effective housing policies need to be closely related to where and when the housing need is anticipated.” [§6.13]*

²⁰ www.local.gov.uk/good-plan-making-guide

- 5.22 Finally, it is relevant to note here that the Council's UPSVLP Plan Period is flawed in itself. The NPPF is clear that "*Strategic policies should look ahead over a minimum 15 year period from adoption¹⁵, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.*" [paragraph 22]
- 5.23 The Plan's current end date is 2038. However, according to the Council's latest Local Development Scheme [LDS] (September 2021), as a best-case scenario it is anticipated that the Plan will be adopted by July 2023. If this is adopted to this schedule, then it would look forward 15 years – just. **However, if there is any slippage at all, then the Plan Period will be less than the 15-year statutory minimum and will be unsound as a result.**
- 5.24 The Council has produced 9 LDS's in recent years, with the previous 8 containing similarly optimistic Local Plan review timeframes that have been missed time and again. The previous March 2019 LDS for example, stated confidently that the Warrington Local Plan EiP would take place in early 2020, with the estimated date of adoption coming in December 2020. This deadline has been missed by some distance and we have no faith in the Council's ability to hit its latest 2023 deadline for adoption. The Plan period should be lengthened as a consequence to factor in the inevitable slippage in the adoption date.
- 5.25 The lack of any flexibility in the plan period is also referenced in our other Technical Paper on Housing Land Supply, which criticise the lack of any flexibility in the level of housing provision necessary to safeguard Green Belt boundaries into the long term.

Conclusion and Recommendations

- 5.26 The Housing Consortium considers that the phased approach to housing delivery over the Warrington Plan Period is fundamentally flawed and unsound. For example, the NPPF states that the Government has an objective of '*significantly boosting the supply of homes*' [paragraph 60], whilst paragraph 74 specifically sets out how the supply of specific deliverable sites should in addition include a buffer that involves moving forward a proportion of housing need from later in the plan period. The Council's Plan is unsound as it does the exact opposite, suppressing need and pushing delivery back to the latter stages of the Plan.
- 5.27 The emerging Plan and its evidence base do not provide any robust justification for including a phased housing requirement which significantly reduces delivery in the first four years of the Plan. This approach conflicts with the objectives of the NPPF and the Consortium believes that the approach taken is not sound and will not meet the tests of soundness when the Plan is undergoing Examination in Public.
- 5.28 Phasing should be identified on the basis of need, and not on the basis of the minimum level necessary to pass future 5YHLS tests. To reward a Council which has consistently failed to bring forward desperately needed housing in recent years, as exemplified by the fact that it has comprehensively failed the HDT and already faces the highest penalty of the tilted balance in favour of sustainable development, is perverse.
- 5.29 It is the Consortium's strong view that instead of pushing it to the end of the Plan period, the buffer should instead be brought forward to ensure that a sufficient supply of land comes forward for development in the early years. The Consortium realise that Brownfield sites play a very important role in the delivery of sustainable development and addressing the housing crisis, but the lack of supply needs to be urgently addressed by the inclusion of additional greenfield and Green Belt sites, with the Plan Period extended.
- 5.30 To accord with the NPPF [§59], the Consortium considers that, in the future, a balanced strategy should be adopted, identifying a suitable supply of Brownfield and greenfield sites that responds to an evidenced-based assessment regarding the size, type and tenure required. This should

ensure that supply included in the Plan is capable of meeting specific needs of housing market areas in the sub-region. If a significant proportion of the Plan's supply comprises large strategic sites, then a suitable supply of smaller, deliverable greenfield sites must also be identified to offset the infrastructure challenges strategic sites will face in coming forward any sooner.

- 5.31 The Consortium also strongly advocates the identification, through an appropriate evidence base, of a number of smaller and sustainably located Green Belt releases for residential development (i.e. sites with capacity to deliver 200-500 units). These sites would be able to come forward immediately upon adoption of the Warrington UPSVLP and negate the need to backload the housing requirement. It would also seek to tackle the ever-worsening housing crisis in the Borough.

6.0 Assessing Future Needs by Size and Type

6.1 To understand if the mix identified in the Warrington Local Housing Needs Assessment Update (August 2021) [LHNA] aligns with likely future demand, Lichfields has undertaken a detailed analysis of demographic trends and household structures across Warrington Borough to assess the size of dwellings required to meet the future needs of the local market. Lichfields has also undertaken an assessment of the proposed supply of residential sites in the UPSVLP to understand whether they can deliver the identified demand for larger properties. The Consortium has concerns that the supply of housing in the UPSVLP does not align with the mix identified in the LHNA.

The type of homes to be provided

6.2 Emerging UPSVLP Policy DEV2 sets out the Council’s key policy for meeting Warrington’s housing needs. Part 11 of the Policy states that:

“Residential development should provide a mix of different housing sizes and types and should be informed by the Borough-wide housing mix monitoring target in the table below; the sub-area assessment contained in the Council’s most up to date Local Housing Needs Assessment; and any local target set by a Neighbourhood Plan, taking into account site specific considerations.”

6.3 The Warrington Local Housing Needs Assessment Update (August 2021) prepared by GL Hearn, is the Council’s most up-to-date Local Housing Needs Assessment. A summary of the identified housing mix for Warrington is set out in the UPSVLP [§4.1.53] and is replicated in Table 6.1:

Table 6.1 Summary of Housing Demand in Warrington

	1-bedroom	2-bedrooms	3-bedrooms	4+ bedrooms
Market	5%	35%	50%	15%
Affordable Home Ownership	20%	40%	30%	10%
Affordable Housing (rented)	40%	30%	25%	5%

Source: Warrington Updated Proposed Submission Version Local Plan (September 2021)

6.4 The supporting text for Policy DEV2 states that the breakdown of housing identified in Table 6.1 is a Borough-wide monitoring target and that the *‘precise mix should be determined on a site by site basis, taking in account the sub-borough analysis which is contained in the Council’s most up to date Local Housing Needs Assessment’* [§4.1.55].

Local and National Context

6.5 This section provides further context on how the housing market operates. It demonstrates that:

- 1 Locally and nationally, households tend to occupy housing which they can afford, rather than ‘need’, resulting in a high-level of under-occupation, particularly amongst older households;
- 2 Older households are likely to remain in larger, family homes and less likely to move as they age, resulting in ‘empty-nesting’ and significant under-occupation; and,
- 3 Although the dominant trend is one of over-occupation, a number of households (including families with children) are living in overcrowded conditions in Warrington because they are unable to access the larger properties that they need.

Dwelling Stock

- 6.6 Table 6.2 shows the change in dwelling stock in Warrington and England between 2001 and 2011. Over that period there was a 10.0% increase in the total dwelling stock in Warrington, compared to an 8.4% increase in England. The percentage increase of detached and semi-detached properties in Warrington is broadly in line with that of England. However, the increase in terraced properties and flats/maisonette increased at a greater rate in Warrington than England. As noted in the LHNA, Warrington recorded a substantial uplift in the number of flats between 2001 and 2011. This level of growth far outstripped the growth in the wider HMA, the North West and England as a whole. This suggests that there has been a strong growth in smaller homes in Warrington compared with comparable geographies.

Table 6.2 Summary of change in dwelling stock by type: Warrington and England

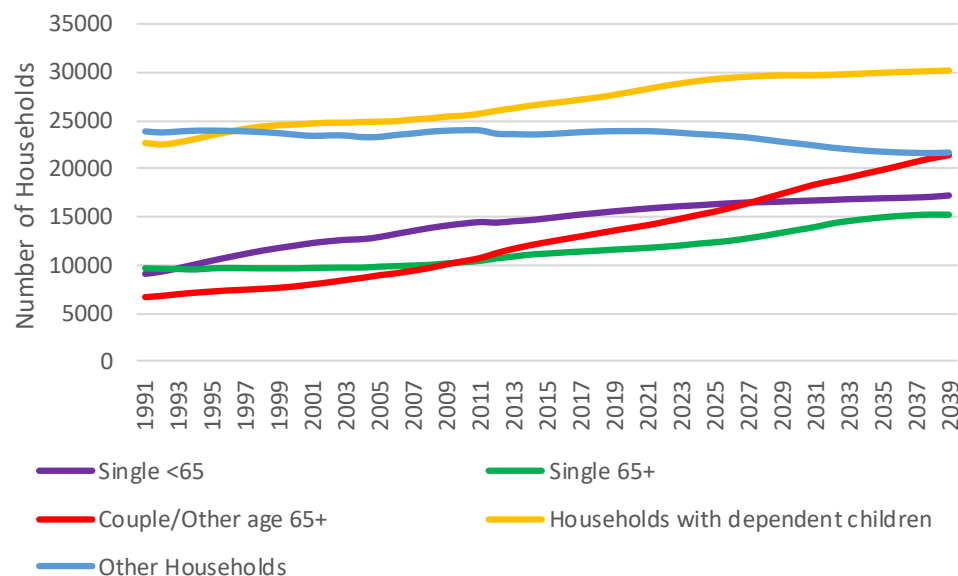
	Warrington			England		
	2001	2011	Change	2001	2011	Change
Detached	19,465 (24.3%)	20,826 (23.7%)	7.0%	4,786,456 (22.5%)	5,128,522 (22.3%)	7.1%
Semi-Detached	34,172 (42.7%)	36,023 (41.0%)	5.4%	6,713,183 (31.6%)	7,076,395 (30.7%)	5.4%
Terraced	19,496 (24.4%)	21,162 (24.1%)	8.5%	5,494,033 (25.8%)	5,642,969 (24.5%)	2.7%
Flat/Maisonette	6,675 (8.3%)	9,870 (11.2%)	47.9%	4,180,235 (19.7%)	5,095,953 (22.1%)	21.9%
Other	170 (0.2%)	81 (0.1%)	-52.4%	88,918 (0.4%)	100,228 (0.4%)	12.7%
Total	79,978	87,962	10.0%	21,262,825	23,044,097	8.4%

Source: Census 2001/2011

Household Change

- 6.7 Figure 6.1 shows the change in the number of different household types in Warrington since 1991 and the projected changes over the period to 2039. The dominant household type in 2014 was households with dependent children (30.2%), closely followed by couples/other households under the age of 65 (26.9%). Single households 65+ (12.6%) and couples/other households 65+ (13.7%) were the least common household types.

Figure 6.1 Past and projected household change by type in Warrington Borough



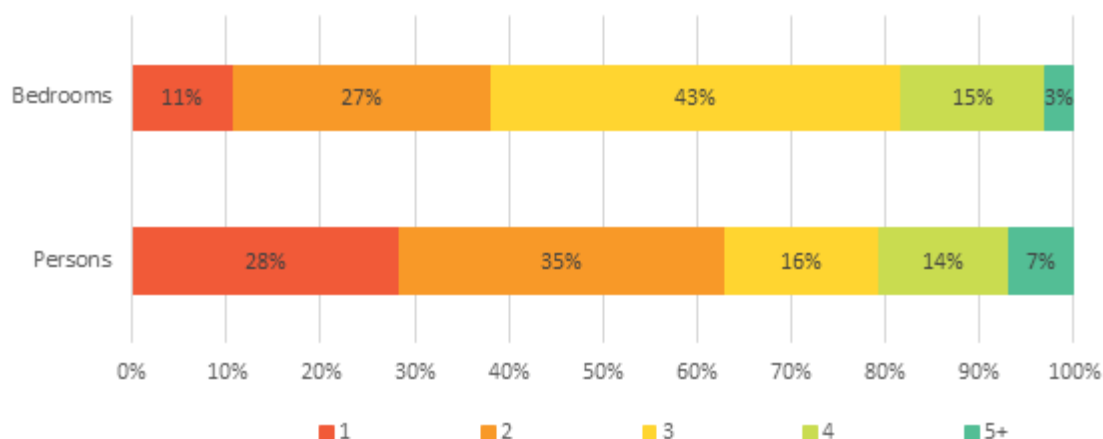
Source: MHCLG 2014-based Sub National Household Projections

- 6.8 The MHCLG 2014-based household projections forecast that there will be an increase of 17,885 households in Warrington between 2014 and 2039. It is projected that couples/other households aged 65+ will grow most quickly between 2014 and 2039 (44.8%), followed by single older person households (27.6%). There is projected to be a more modest increase in households with dependent children (12.1%) and single households under 65 (14.8%). Couples/other households under 65 are projected to decrease by 8.9% in Warrington between 2014 and 2039.

Household Size, Occupancy and Number of Bedrooms

- 6.9 Using the ONS's Labour Force Survey's assessment of overcrowding and under-occupancy, we can understand the relationship between the size of a households and the number of bedrooms available (albeit that this does not take into account the relationships between household members).
- 6.10 Figure 6.2 compares the profile of the English dwelling stock and household structure. It demonstrates that whilst 63% of households in England comprise of just 1 or 2 persons, just 38% of dwellings have 1 or 2 bedrooms. By contrast, 43% of dwellings have 3 bedrooms, compared to 30% of households with 3 or 4 people.

Figure 6.2 Comparison of dwelling mix (number of bedrooms) and household size (number of persons) in England



Source: 2015/16 English Housing Survey, Annex Table 2.2 / ONS Labour Force Survey

- 6.11 Table 6.3 shows the occupancy patterns (in terms of household-dwelling type) of all private sector households in England. It shows that 2-person households in 3-bedroom dwellings form the largest group of household-dwelling type, with 16.1% of households falling within this group. This broadly aligns with the findings of the 2011 Census occupancy ratings, which shows that ‘couples without children’ make up the largest group of under-occupying households.
- 6.12 Contrary to what might be expected, most single person households actually occupy 2 and 3-bedroom dwellings, with relatively few living in 1-bedroom dwellings. Within larger dwellings, there is no clear trend for larger households being more likely to occupy larger housing, with a similar number of 5-bed dwellings being occupied by 4-person households as 2-person households.

Table 6.3 Household size by number of bedrooms in England

		Number of bedrooms				
		1	2	3	4	5+
Number of people in household	1	5.2%	10.4%	9.5%	1.9%	0.5%
	2	2.2%	10.9%	16.1%	5.5%	1.4%
	3	0.4%	3.4%	8.2%	3.2%	0.9%
	4	0.1%	1.4%	7.0%	4.0%	1.2%
	5	0.0%	0.3%	1.9%	1.6%	0.8%
	6+	0.0%	0.1%	0.7%	0.7%	0.6%

Under-occupied	50.5%
Standard	43.9%
Over-occupied	5.6%

Source: Census 2011. Excluded Social Rented Households

- 6.13 Table 6.4 below illustrates that there is a more significant pattern of under-occupancy in Warrington than England. Excluding the social rented sector, 55.2% of properties in Warrington are under occupied, compared to 50.5% in England. This demonstrates that there is a clear trend of smaller households occupying larger dwellings in Warrington.

Table 6.4 Household size by number of bedrooms in Warrington

		Number of bedrooms				
		1	2	3	4	5+
Number of people in household	1	2.9%	9.8%	10.9%	1.8%	0.4%
	2	1.0%	9.7%	19.3%	5.9%	1.0%
	3	0.1%	2.8%	9.6%	4.1%	0.9%
	4	0.1%	0.9%	7.5%	5.1%	1.3%
	5	0.0%	0.2%	1.5%	1.6%	0.6%
	6+	0.0%	0.0%	0.4%	0.4%	0.3%

Under-occupied	55.2%
Standard	41.1%
Over-occupied	3.6%

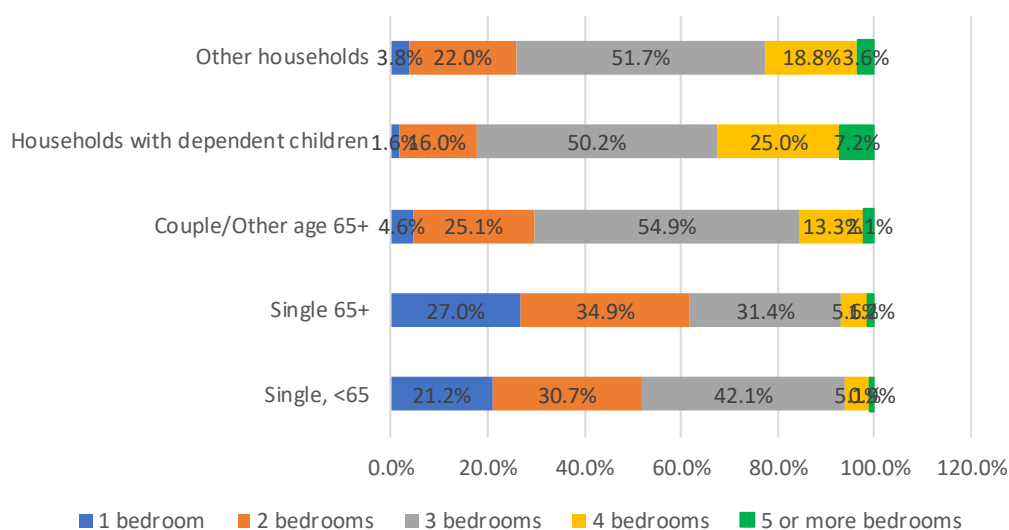
Source: Census 2011- Excluding Social Rented Sector

6.14

Figure 6.3 illustrates that household occupancy patterns in Warrington broadly align with the trend across England. In particular, it indicates that:

- 1 In Warrington, over 70% of couples/other households over the age of 65 live in accommodation with at least three bedroom;
- 2 38% of single older person households (65+) live in accommodation with at least three bedrooms; and,
- 3 48% of single households under the age of 65 live in accommodation with at least three bedrooms.

Figure 6.3 Occupancy Patterns by Household Composition in Warrington



Source: Census 2011 - DC1402EW

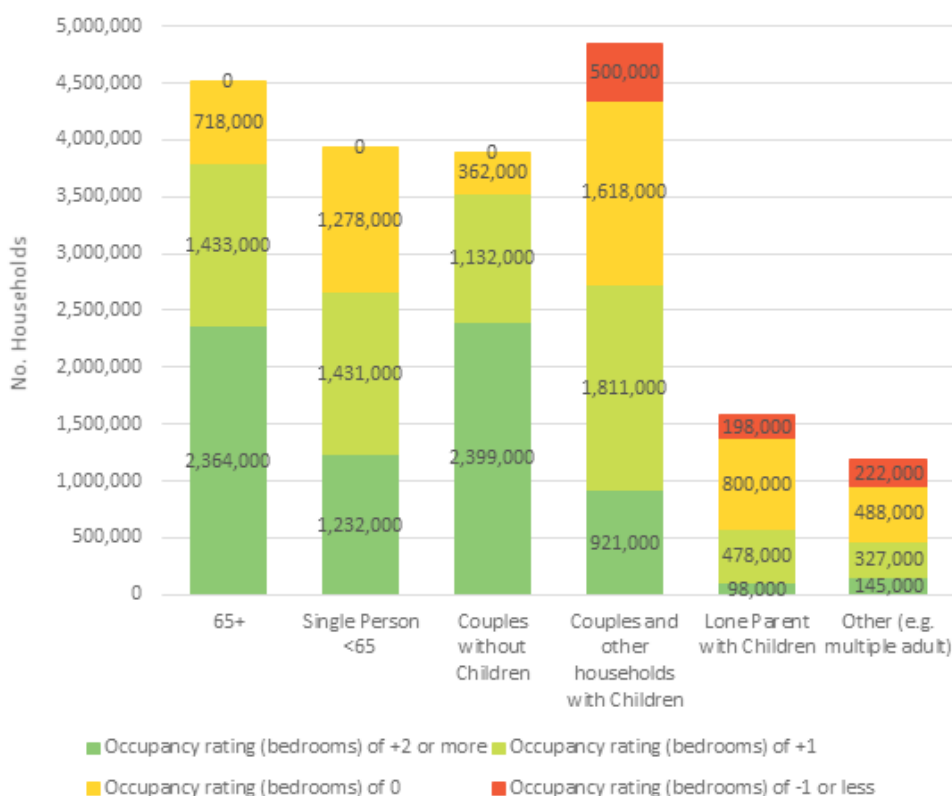
House Moves

6.15

Having assessed how households occupy housing in the open market, it is useful to benchmark these findings against the characteristics of moving households in order to assess the role that different households' play in 'freeing up' dwelling stock. In an arguably 'perfect' market, older households which under-occupy housing would downsize once they no longer require their family homes (meaning growth in the number of small, older households generates a need for smaller dwellings). This would subsequently allow larger families to optimally utilise the larger housing stock available.

6.16 However, as shown in Figure 6.4, the Census indicates that this is often not the case, with 2.4 million households (52.4%) aged over 65 nationally having at least two spare bedrooms, and just 718,000 (15.9%) occupying housing in line with their ‘needs’. This might relate to a lack of sufficient supply of housing products perceived to be attractive to those downsizing, but equally research suggests there is simply a strong preference from many people to remain in their existing homes.

Figure 6.4 Occupational patterns in England by household type



Source: Census 2011. Excludes social rented.

6.17 Research²¹ by the University of York (on behalf of the Government) found that the majority of older households were happy with their home, regardless of the type of property, having invested time and resources into their home, and that any potential issues arising with size or accessibility were not too great to be overcome through adaptation. Some also felt that moving would be stressful and overwhelming, and potentially result in the (unwanted) disposal of possessions. Even so, when older households considered the type of housing which would be seen as ‘ideal’, a minimum of two-bedrooms was seen as essential, as well as sufficient living space e.g. for eating and recreation. Depending on the layout of individual properties, this might therefore necessitate a minimum of three-bedrooms. In addition, research by the Joseph Rowntree Foundation [JRF]²² showed that 85% of larger housing released by older people is released due to death, as opposed to choosing to downsize.

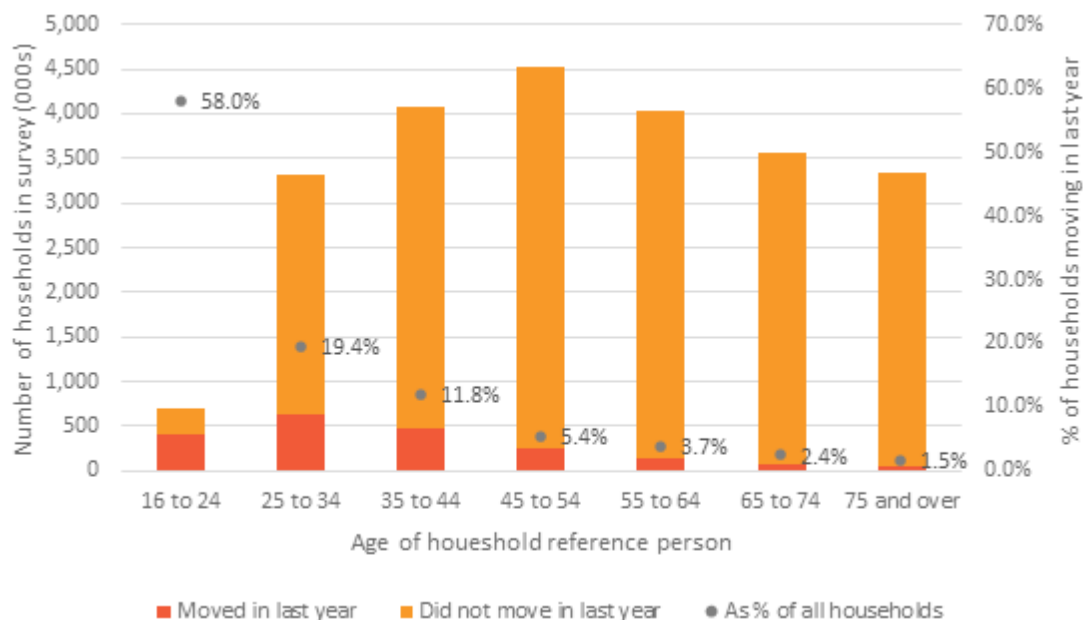
6.18 The 2018/19 English Housing Survey [EHS] further supports these findings by showing that older households are the least likely to move, with just 2.4% of households aged between 65 and 74 and 1.5% of households over the age of 75 moving in the previous 12 months. This pattern has been stable at c.2% over recent years, with no indication of changes in the tendency for older

²¹Communities and Local Government (February 2008): Housing Choices and Aspirations of Older People, Research from the New Horizons Programme

²² Supported housing for older people in the UK: An Evidence Review (December 2012)

people to choose to remain in their homes. By comparison, younger households have a much higher propensity to migrate, with over half of households aged 16-24 and almost 20% of households age 25-34 moving each year.

Figure 6.5 Demographic characteristics of moving households



Source: 2018/19 English Housing Survey, Table FA4121

6.19 These patterns are reflected in the EHS data on household moves by employment status: only 2.1% of retired households moved in the 12 months prior to the 2018/19 Survey, compared to 10% of households where the household reference person was employed in full or part time work. This evidence is also consistent with findings of the Census, which found that only 3.6% of households over 50 moved in the year prior to 2011.

6.20 In addition to the factors identified above, these patterns of households moving are also likely to reflect different households' satisfaction with their housing. The 2018/19 EHS²³ also shows that households which are most satisfied with their housing are those which are:

- 1 Aged 75 and over (95.7% are satisfied or very satisfied with their housing);
- 2 Own outright or are buying with a mortgage (94.9%)
- 3 Retired (94.6%);
- 4 Have no dependent children (94.4%); and.
- 5 Under-occupy housing (93.7%).

6.21 It is evident from this analysis that older households are the most likely to:

- 1 Under-occupy housing;
- 2 Be the most satisfied with their housing; and as a result,
- 3 Be relatively inactive within the housing market.

6.22 **This further highlights that older households cannot necessarily be relied upon to free up larger dwellings to the degree needed to meet the needs of future families.**

²³ Table FA5401

6.23 As set out above, however, personal preference may not be the only reason why older households do not seek to downsize or rightsize. Separate research by JRF²⁴ also highlighted the potentially misleading nature of any discussion which assumes that older people are holding onto housing and stated that this narrative “ignores both the lack of housing choice, as well as older people’s psychological and social reasons for staying put” (page 4). Indeed, the 2016 ‘Future of an Ageing Population Report’, which was prepared by the Government Office for Science, noted that that 58% of people over 60 were interested in moving but could not find suitable properties. This conclusion is supported by the Right-Size Report²⁵ which undertook analysis of the delivery of older person’s accommodation nationally. It found that since 2000, on average, as few as 5,500 retirement housing units have been built each year, despite the prominence of the ageing population.

6.24 There is, generally, a distinct lack of data, evidence and research on the preferences and needs of elderly households; this makes it difficult to determine how best to meet the needs of an ageing population. However, though some older households may choose to downsize, evidence and research overwhelmingly indicates that the majority of older households are unlikely to move and (for a multitude of reasons) intend to remain in the family home. Even those that do look to move to a new house would not necessarily seek a very small property, they move to properties that are more accessible or with care facilities. Small, high rise apartment schemes generally do not align with these aspirations. Ultimately, the research suggests that the lack of choice for older households is a product of supply and demand.

Summary

6.25 The evidence and analysis contained within this section highlights the following key issues:

- 1 Warrington is projected to experience a significant increase in the number of older households over the Local Plan period 2021-2038, and a lower level of growth in the number of households comprising younger couples and families;
- 2 Both nationally and locally, households tend to occupy housing which they can afford, rather than ‘need’, resulting in a high level of under-occupation, particularly older households;
- 3 Older households are likely to remain in larger, family homes and less likely to move as they age, resulting in ‘empty-nesting’ and significant under-occupation; and,
- 4 Although the dominant trend is one of over-occupation, a number of households (including families with children) are living in overcrowded conditions as they are unable to access the larger properties that they need

Assessing Future Need

6.26 Drawing on the preceding analysis, this section identifies the appropriate size mix of market housing for Warrington.

Approach

6.27 To assess future need in the local area, we have used the MHCLG’s 2014-based Household Projections for Warrington to create a projection for each household type. We then applied patterns of occupancy by household type (for open market housing) using local data for Warrington to generate an understanding of the future housing need by bedroom size.

²⁴ Older People’s Housing: Choice, Quality of Life and Under-occupation (May 2012)

²⁵ Mapping the supply and demand of Britain’s retirement housing in 2017 and beyond

6.28 In considering the housing mix that is most suitable for Warrington, it is appropriate to view the results set out below through a number of prisms, as follows:

- 1 The role of family housing in the wider market; and,
- 2 The demand for homeworking.

The role of family housing in the wider market

6.29 Given that the current open market does not cater for the full needs and demands of the population, new housing should be considered not only in the context of future household growth but how it will address the needs and demands of the future population as a whole. Basing the assessment of an appropriate housing mix only on the needs and demands of new households will neglect the requirements of existing households that may aspire to a larger home.

6.30 The provision of additional housing supply will have impacts throughout the housing ladder, as vacated dwellings become homes for other households. This process has been widely studied as one of the possible applications of the 'Markov Chain Model'.

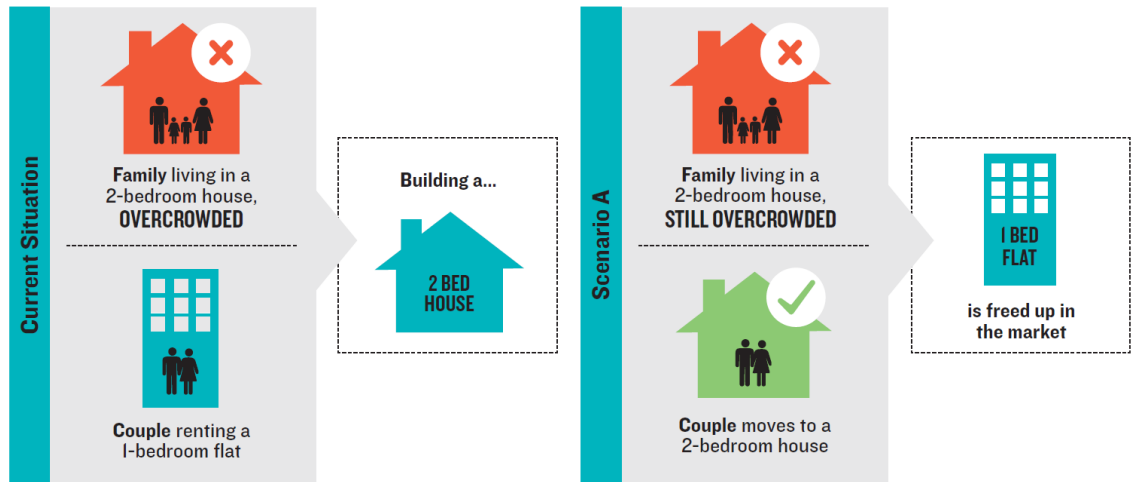
6.31 The Markov Chain Model, and specifically its application to the housing market, suggests that a new vacancy at the top of the housing ladder generates a statistically expected number of subsequent household moves. This is because as a new-build larger home is occupied, a smaller home is left vacant for a new household (e.g. a family), whose move would in turn free up a home for a smaller/new household. Whilst longitudinal datasets on households' moves are not available in England, analysis of Swedish housing data shows that there were between 3.1 and 4.4 moves per new home built between 2000 and 2002²⁶, with vacancies created at larger multi-family homes creating the longest vacancy chains. The study also found that vacancies initiated by owner occupier moves generated longer vacancy chains compared to those initiated by renters.

6.32 For the purposes of illustrating, in a simple manner, the potential role of larger housing within a vacancy chain model in the open market, Lichfields has considered two scenarios at Figure 6.6 and Figure 6.7. These are both simplified for effect and are not a representation of precise moves within a local market but represent (in broad terms) the dynamics at play.

6.33 Figure 6.6 illustrates the potential impact of building a 2-bedroom home in an area where there is already a need/demand for larger housing.

²⁶ Magnusson Turner, L. (2008). Who Gets What and Why? Vacancy Chains in Stockholm's Housing Market, *International Journal of Housing Policy*, 8(1), pp. 1-19. <http://dx.doi.org/10.1080/14616710701817133>

Figure 6.6 Housing ladder outcomes: Scenario A – building a 2-bed house

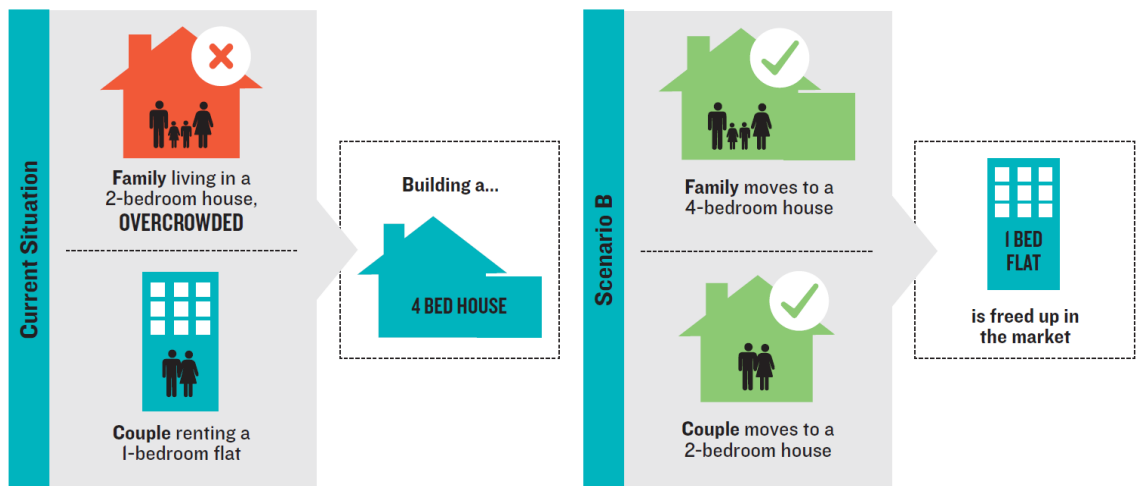


Source: Lichfields

6.34 This scenario indicates that erecting smaller homes will not necessarily meet the needs and demands of the overall population as it only facilitates movement between smaller dwellings in the housing market.

6.35 Figure 6.7 demonstrates the potential impact of building a 4-bedroom home in this same housing market scenario.

Figure 6.7 Housing Ladder outcomes: Scenario B – building a 4-bed house



Source: Lichfields

6.36 Under this scenario, the result is movement up the housing ladder for both households (with the family moving into larger accommodation and the couple moving from a flat into a house). It still results in the release of a smaller dwelling (a flat) back into the market to cater for newly forming/smaller households.

6.37 Ultimately, larger housing provision can help play a two-fold role within meeting the wider needs of household growth across the whole market by:

- 1 Meeting the needs of households, in terms of current overcrowded households who are in need of larger housing – this in turn means that the needs of smaller, newly forming households can be met as smaller housing is freed up further down the ladder; and,
- 2 Meeting the demands of households, in terms of smaller households aspiring to buy/upsized within the market – this again also results in the freeing up of smaller housing further down the ladder.

6.38 Taking account of housing ladder dynamics and the Markov Chain Model, it is clear that the provision of larger homes can play a key role in facilitating movement throughout the housing market. It can help to address issues of overcrowding and concealed families.

6.39 The provision of larger housing will help to address some of these pressures whilst also releasing smaller housing further down the ladder for smaller or newly forming households. It will not, therefore, lead to a reduction in the availability of vacant smaller homes.

The Shift Towards Homeworking

6.40 Another factor that will influence the current and future demand for larger homes is the trend towards home working. The Covid-19 pandemic has had a profound impact on working practices and particularly the shift to homeworking. Even before the pandemic, the ONS Labour Force Survey showed that there had been a steady rise in the proportion of people in employment of those working from home, either working directly from the home or using home as a base. In 2017 this stood at 13.6% of people in employment. Homeworking typically increases with age (increasing from 5.1% of those age 16-24 to 38.3% of people age 65+ using their home for work) and so the ageing in the population is likely to lead to further increases in home working.

6.41 Increases in the number of people working from home may translate into a demand for larger housing as people seek additional space, e.g. spare room or garage for use as an office. Research by London School of Economics/Acas found that the majority of homeworkers surveyed used a separate room/office that is only used for work, with this being a key aspect of separating work and home life. Of those who did not have the space for a separate working area, this was described as being “far from ideal”, highlighting the importance of sufficient space for homeworkers. Although limited data availability means the relationship between home-working and housing size/demand cannot be interrogated in detail, the aspect of home working nonetheless remains implicit within the demand for housing.

6.42 The impact of the Covid-19 pandemic has radically changed the profile of homeworking. Research undertaken by the Chartered Institute of Personnel and Development [CIPD] in July 2020 found that:

- 1 37% of employees expect to work from home on a regular basis once the crisis is over, compared to 18% before lockdown.
- 2 Businesses expect that the proportion of staff working from home all the time will increase from 9% before the pandemic to 22% in the future.

6.43 As we move out of the pandemic, this shift in working patterns, though lessened, appears permanent. Many companies have switched to a ‘hybrid’ work pattern, allowing employees work from home part of the time. This is expected to have a direct impact on the demand for housing as people need appropriate space and facilities to work effectively from home.

6.44 The increased prevalence of homeworking means that, in many cases, such people would be able to relocate without changing jobs. We have been advised by the members of the Consortium

that the demand across Warrington has been strong and generally focused on family-sized properties.

- 6.45 Based on these factors and the qualitative analysis set out in this report, we consider that there is a strong argument to justify a housing mix that diverges from the established projected mix for Warrington. Taking account of the overall profile and dynamics of the market, and recognising the importance of ensuring that the needs of all households are met (particularly growing families), we recommend applying an adjustment to take account of household change plus a 15% reduction in the number of smaller (1-2 bed) dwellings and a commensurate increase in the number of 3 and 4 bedroom properties. This is applied below.

Warrington's Future Need

- 6.46 Applying local adjustments (based on household age profiles in Warrington) to a proportional share of the 2014-based household projections for Warrington suggests a growth of 660 households per year in the local area, or 11,224 in total over the 17-year period 2021-2038. Table 6.5 shows that 9,484 of these additional households are likely to be in the open market sector based on current tenure patterns by household type. In line with wider national and regional trends, it is expected that there will be a significant increase in the number of older households. Lichfields analysis, based on the 2014-based household projections, forecasts a 49% increase in couples/other households aged over 65 and a 30% increase in single households aged over 65. It is projected that there will be a 10% decrease in the number of households comprising couples/other multiple adult households under 65.

Table 6.5 Estimated Household Projections for Warrington: Open Market Sector

	2021-2038 Net Change	% change
Single, <65	901	8%
Single 65+	2,689	30%
Couple/Other age 65+	6,494	49%
Households with children	1,545	7%
Other households	-2,146	-10%
Total	9,484	12%

Source: Lichfields analysis using MHCLG data

- 6.47 The current occupancy pattern in market housing by household type in Warrington is shown below in Table 6.6.

Table 6.6 Occupancy by Household Composition in Warrington

	No bedrooms				
	1	2	3	4	5+
Single, <65	21.2%	30.7%	42.1%	5.1%	0.9%
Single 65+	27.0%	34.9%	31.4%	5.6%	1.2%
Couple/Other age 65+	4.6%	25.1%	54.9%	13.3%	2.1%
Households with dependent children	1.6%	16.0%	50.2%	25.0%	7.2%
Other households	3.8%	22.0%	51.7%	18.8%	3.6%

Source: Census 2011 - DC1402EW

- 6.48 The occupancy patterns (Table 6.6) in market housing in Warrington are applied to the projected household growth by type (Table 6.5) to establish the required housing by number of bedrooms.

Table 6.7 Warrington Projected Household Growth by bedroom size - net change 2021-2038

	No Bedrooms				
	1	2	3	4	5+
Single <65	191.10	276.64	379.28	45.88	8.41
Single 65+	725.21	937.62	843.79	150.28	32.07
Couple/Other Households	300.96	1628.77	3563.00	866.94	134.76
Households with dependent children	24.29	247.04	775.46	386.58	111.85
Other Households	-82.44	-472.37	-1110.56	-404.34	-76.34
Total	1159.12	2617.71	4450.97	1045.35	210.75

Source: Lichfields using MHCLG/Census 2011

- 6.49 The results indicate that the projected household growth in Warrington will be predominantly larger properties (3+ bedrooms). Table 6.8 shows that once the market profile adjustment for recent homeworking trends is applied to the housing mix above, approximately two thirds of the demand for housing is projected to be for properties with at least three bedrooms.

Table 6.8 Sizemix for Warrington

	1 and 2 Bedroom Properties	Larger Properties (3+ Bedrooms)
Mix prior to market adjustment	39.8%	60.2%
Mix following market profile adjustment	33.9%	66.1%

Source: Lichfields Analysis using MHCLG/Census Data

Summary of Size Mix Results

- 6.50 The comparison in Table 6.9 demonstrates that the proposed mix of market housing included in the UPSVLP broadly aligns with the level of demand identified from applying local household projections by household type to current occupancy patterns in Warrington. The UPSVLP and Lichfields analysis both concur that approximately two-thirds of the demand for new housing in Warrington will be for larger properties with at least three-bedrooms, and approximately a third of demand will be for smaller one and two-bedroom properties.

Table 6.9 Comparison of Size Mix

	1 and 2 Bedroom Properties	Larger Properties (3+ Bedrooms)
Local Plan Dwelling Size Mix	35%	65%
Lichfields Size Mix Analysis	34%	66%

Source: Warrington Updated Proposed Submission Version Local Plan / Lichfields Analysis

Meeting the identified mix of housing

- 6.51 The Framework [§68] states that planning policies should identify a sufficient supply and mix of sites. The Consortium is concerned that, although the UPSVLP identifies an appropriated mix of housing, the supply of residential sites in Warrington will not meet this demand. Lichfields has undertaken an assessment of the sites identified in the SHLAA with a capacity of over 50 dwellings. The Housing Needs Assessment Update recommends that 65% of market units should comprise 3 and 4+ bedroom properties yet the Council's supply will deliver nowhere near this number of larger dwellings. As such, there is a complete mismatch between the supply and the need which will be substantiated further as one interrogates the Council's claimed

supply. This is further compounded by the Council's high-density assumptions which will promote the delivery of smaller dwellings over the dwelling sizes identified in their evidence.

6.52 This analysis indicates that the mix of 1-bed and 2-bed dwellings on sites over 50 dwellings exceeds the 35% proposed in the UPSVLP.

6.53 A case in point is Warrington's Town Centre Masterplan document. The masterplan sets out that high density residential development with more people living in Warrington Town Centre is fundamental to the future of the place and central to the masterplan. The Town itself is divided into 6 Development Quarters and the masterplan indicates that 8,000 new homes will be provided with the Town Centre and Waterfront by 2040. It is anticipated that the 8,000 new homes will be delivered at densities of 240 units per hectare and '*in the form of town houses and apartments*'.

6.54 Similarly, the SHLAA (2020) sets out that a density assumption of 275 dph has been applied to appropriate locations in Warrington Town Centre. An assumption of 130 dph has been applied to sites outside the town centre but within 'Inner Warrington'. Appendix three of the SHLAA sets out the density and net developable area of recently developed SHLAA sites in Warrington. All recently developed sites with a density in excess of 105 dpa comprise solely apartments. Therefore, it is reasonable to assume that the vast majority of Town Centre and Inner Warrington sites in the SHLAA will comprise solely 1-bed and 2-bed dwellings.

6.55 Given the extremely high density being advocated in the Masterplan document (240 dph), it is impossible to understand how any larger 3 and 4 bedroomed family homes will be delivered of the 8,000 proposed to come forward by 2040.

6.56 The members of the Consortium are experienced developers and having assessed the supply of homes consider that it will deliver significantly more than 35% 1-bed and 2-bed properties. A failure to identify a sufficient supply of sites to meet the identified demand (65%) for larger properties will result in the creation of imbalanced communities. This will lead to a constricted supply of larger properties and a deterioration in their affordability. Providing larger houses is vital as they can act as a mechanism for people to move around within the market and free up housing along the housing ladder.

Summary

6.57 In summary:

- 1 Across Warrington there is a pattern of smaller households living in large homes. Lichfields' analysis indicates that in Warrington 48% of single households aged under 65 and 38% of single older person households (65+) live in accommodation with at least three bedrooms. Over 70% of couples/other households aged 65+ live in accommodation with at least three bedrooms;
- 2 According to the 2014-based SNHP, older households will see the fastest growth across Warrington, with couples aged 65+ increasing by 49% and single-person households aged 65+ increasing by 30% between 2021 and 2038. Single person households aged under 65 and households with dependent children are forecast to increase by 8% and 7% respectively. Couples and other households aged 65 and under are forecast to decrease by 10%;
- 3 Lichfields has calculated the mix of future housing required in Warrington by taking the change in different types of households from the 2014-based SNHP and applying current occupancy patterns from the Census 2011;

- 4 Lichfields' analysis indicates that there is an overall need for 34% 1-bed and 2-bed properties over the period 2021-2038, and a 66% need for larger 3-bed+ properties. This broadly aligns with the need for larger properties identified in the LHNA, which has been taken forward in the emerging UPSVLP;
- 5 A higher proportion of 3 and 4-bed properties logically points to a need for higher numbers of larger semi-detached and detached properties for families and fewer 1 and 2 bed apartments. The Consortium is concerned that the supply of sites in Warrington, particularly those in the Town Centre and Inner Warrington, will not deliver the mix of homes identified in the emerging UPSVLP. Given the extremely high density being advocated in the Masterplan document (240 dph), it is impossible to understand how any larger 3 and 4 bedroomed family homes will be delivered of the 8,000 homes identified in this area to 2040. The members of this Consortium are very experienced developers and housebuilders yet they have never seen town houses or family homes being delivered at an average density of 240dph. As such, this Plan as drafted will fail in many regards but in particular to meet its aspiration that 65% of dwellings delivered will comprise larger properties.
- 6 The Consortium considers that providing a supply of sites capable to delivering over 65% larger 3+ bedroom properties is vital to creating a balanced community in Warrington and freeing up housing along the housing ladder.

7.0 Conclusion

- 7.1 Whilst the Consortium welcomes the arrival of the latest version of the Warrington UPSVLP and the work that has taken place in its preparation, as it stands, the Plan is unjustified in its evidence, inconsistent in its messaging and unsound as a result. We are living in unprecedented times, but it has to be said that the strategy followed, of suppressing housing delivery to the minimum required by the standard methodology; of backloading this need to the end of the Plan period; and failing to meet affordable housing needs in full, is a very risky one that does not align well with existing needs, whilst the necessary community infrastructure will not be delivered. The Council has failed to learn the lessons from its adopted Core Strategy, which had its housing policies quashed in the High Court in 2015 for many of the same reasons that remain live issues in this latest version.
- 7.2 WBC's new 'do minimum' approach stands in stark contrast to its former pro-growth housing agenda as set out in previous drafts of the Plan. In summary, the UPSVLP and its housing evidence base does not meet the test of soundness as it is **not positively prepared, not justified, not effective and not consistent with national policy** for the following reasons:
- 1 **816 dpa is insufficient to meet housing needs:** the LHN target derived from the standard methodology only represents the minimum starting point. There are compelling arguments to increase the overall housing need which have been totally ignored and frankly misinterpreted by WBC and its housing consultants. These include the misalignment with the Plan's very high employment land target; and the very high levels of affordable housing need across the Borough. The solution to address this concern and to be found sound is to increase the housing requirement so that it aligns more closely with the Council's economic growth proposals. **Our modelling indicates that the Council should be planning for at least 1,015 dpa, which is more closely aligned with the Council's previous 2019 target, would address realistic economic growth targets and help to deliver over 70% of its affordable housing need.**
 - 2 **Inconsistencies in the UPSVLP's policies and its own evidence base:** these are manifold, but one of the most relevant is the fact that the Council's own housing evidence (the 2021 LHNAU) and the UPSVLP have different timeframes. The Local Plan is working to an 18-year timeframe (2021/22 to 2038/39), and therefore should arguably be running from 2021 to 2039, not 2038. In contrast, GL Hearn's housing need assessment is over a 17-year timeframe, running from 2021 to 2038. This error is indicative of the extent to which the Local Plan and its own evidence base are fundamentally flawed, unjustified and unsound as a result.
 - 3 **Ignoring the housing affordability crisis:** the UPSVLP fails to take affordability issues into account. It notes that affordability remains an issue in the Borough: "*Not planning to meet development needs could also worsen the affordability of housing, particularly for young people and could constrain Warrington's future economic prosperity.*" [§9.2]. This has no doubt been exacerbated by the dire levels of housing delivery in the Borough over the past ten years or so and its dismal Housing Delivery Test failure that means it cannot demonstrate a 5YHLS. However, the UPSVLP ignores the point by failing to boost housing targets and meet needs in full in the early years of the Plan. **The Plan should be increasing the housing requirement and frontloading housing delivery, not backloading it to the end of the UPSVLP period.**
 - 4 **Phasing concerns:** The UPSVLP proposes to lower targets over the first 5 years to just 678 dpa (17% below the SM2 LHN). This conflicts with the Government's aspiration to frontload housing delivery by factoring in a buffer of additional deliverable sites, brought

forward from later in the plan period [§74]. It appears to be a mechanism designed to protect the Council from losing 5YHLS arguments at appeal, rather than providing homes for local residents in urgent need. **The solution to address this concern and for the Plan to be found sound is to frontload housing delivery as required by the NPPF.**

- 5 **Failure to provide an appropriate mix, size and type of housing:** Lichfields' analysis indicates that there is an overall need for 34% 1-bed and 2-bed properties over the period 2021-2038, and a 66% need for larger 3-bed+ properties. This broadly aligns with the need for larger properties identified in the LHNA, which has been taken forward in the emerging UPSVLP. However, The Consortium is concerned that the supply of sites in Warrington will not deliver the mix of homes identified in the emerging UPSVLP. Given the extremely high density being advocated in the Town Centre Masterplan document (240 dph), it is impossible to understand how any larger 3 and 4 bedroomed family homes will be delivered of the 8,000 homes identified in this area to 2040. The members of this Consortium are very experienced developers and housebuilders yet they have never seen town houses or family homes being delivered at an average density of 240dph. As such, this Plan as drafted will fail to deliver 65% of dwellings as larger properties. The Consortium considers that providing larger houses is vital as they can act as a mechanism for people to move around within the market and free up housing along the housing ladder. **The solution to this concern and for the Plan to be found sound is to provide more greenfield sites capable of delivering the larger property types set out in the Council's own housing need assessment.**

7.3 Taking the above issues into consideration, the Consortium considers that the emerging UPSVLP 2021 fails the NPPF's tests of soundness [paragraph 35] for the following reasons:

- **It is not positively prepared:** The NPPF requires Local Plans to provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs. The UPSVLP does not meet its housing need in full and by any measure is not positively prepared. It does not meet the NPPF's requirements to 'significantly boost the supply of homes', as it is seeking to reduce its housing target from the previous figure of 945 dpa and move away from any alignment with employment growth. It is the consortium's view therefore that the housing evidence supporting the UPSVLP is fundamentally flawed, results in a misaligned approach to development, is unsound and is not legally compliant.
- **It is not Justified:** The UPSVLP is not based on an appropriate development strategy; nor does it take into account the reasonable alternatives. No assessment has been made regarding the level of housing need that would be needed to meet affordable housing needs in full, and nor has a proper analysis been undertaken to test how many homes would be needed to sustain an employment land target of 316 ha, its significant Town Deal ambitions or the strategic infrastructure investment proposed through the delivery of the Western Link Relief Road. In this regard it is not compliant with paragraph 61 of the NPPF and is unjustified as a result;
- **It is not effective:** The UPSVLP is not deliverable over the Plan period, which should be lengthened to factor in the inevitable slippage in the adoption date. The Plan identifies very high levels of affordable housing need which cannot be addressed by the 816 dpa overall housing target. It identifies a need for two thirds of its future housing supply to come forward as larger properties, yet its housing allocations are weighted disproportionately towards town centre, high density apartment blocks which cannot physically accommodate the size of properties necessary. The Borough is one of the least affordable in the North West of England, and yet the Council deliberately defers meeting this need until later in the

Plan period solely to strengthen its hand at appeals by manipulating its 5YHLS. The Plan will not effectively address the wider housing crisis facing its residents as a result.

- **It is not consistent with national policy:** An expressed intention of the Framework is to boost the supply of housing being delivered in an effort to address the nationwide housing crisis. WBC's recent track record of delivering sustainable development, and specifically the levels of housing so desperately needed, has been abject. WBC's HDT result is the 3rd worst in northern England and one of the top 20 worst performing nationwide. Its solution is not to accelerate housing provision and bring forward a wider range of deliverable greenfield sites that can come forward sooner; instead the Council's plan is to actually make things worse by cutting housing targets and backloading delivery. This 'accounting exercise' will only lead to worsening affordability levels, depress economic growth and result in more residents having to move out of the Borough to meet their housing needs.

7.4 For the reasons identified, the Consortium is of the view that the emerging UPSVLP conflicts with national policy in the Framework, and if the Council fails to address these concerns the plan will be found unsound. We have made a series of recommendations above that should be addressed. The Consortium's members would be happy to meet with the Council to discuss these concerns and set out our proposed solutions to overcoming them in further detail.

Appendix 1 Lichfields' PopGroup Modelling Assumptions

	Scenario						
	SNPP	SNPP Rebased	EDNA Employment Land OAN	OE	CE	OE-CE midpoint	Standard Methodology
Model period	2020-2039, in line with the emerging plan period.						
Base population	2020 population by gender and single year of age as set out in 2014-based SNPP.	2020 population by gender and single year of age as set out in 2020 mid-year population estimates.					
Births	Number of births (by gender) inputted from 2014-based SNPP.	Calculated by PopGroup using Total Fertility Rate (TFR) taken from 2014-based SNPP.					
Deaths	Number of deaths (by age and gender) inputted from 2014-based SNPP.	Calculated by PopGroup using Standard Mortality Rate (SMR) taken from 2014-based SNPP.					
Domestic Migration	Number of in and out internal and cross border migrants (by age and gender) inputted from 2014-based SNPP.	Calculated by PopGroup to achieve population growth required to reflect the stated economic/housing constraints.					
International Migration	Based on number of in and out international migrants (by age and gender) inputted from 2014-based SNPP; PopGroup applied adjustment to reflect population constraint.	Number of in and out international migrants (by age and gender) inputted from 2014-based SNPP.					
Household formation rates	Alternative scenarios tested to reflect 2014 SNHP household formation rates and partial catch-up scenarios whereby the household formation rate of males and females aged between 15 and 34 increases gradually between 2020 and 2030 to a point whereby it reflects 50% of the difference between the 2014-based SNHP rates and the 2008-based SNHP rate. 2008-based figures selected on the grounds that they largely replicate the longer-term trend and do not suffer from the "recency bias" that has infected subsequent projections or the change in methodology that has served to reduce the 2016- and 2018-based projections in particular. Note that use of the 2014-based projections reflects the Standard Methodology approach.						Based on 2014-SNHP household formation rates to reflect approach adopted by Standard Methodology.
Population not in households	Institutional population taken from 2014 based SNHP. Figures provided as absolute numbers for those up to and including the age of 74 and percentages for people over that age. This allows for changes in the elderly population in institutional care where there is a change in the population over the age of 75.						
Second home / vacancy rate	Adjustment for second and vacant homes based on an assessment of Council Tax Base data between 2016 and 2021. The average over this period – 2.4% – reflects the 2020 figure and so this has been held constant throughout the modelling period.						No adjustment applied to this scenario on the basis that Standard Methodology conflates households and dwellings.
Economic activity rate	Age and gender specific economic activity rates based on projections that were published by the Office for Budget Responsibility in July 2018 and adjusted to reflect the local baseline rates of economic activity.						

Labour Force (LF) ratio	LF ratio reflects the relationship between the number of jobs and number of employed people in a local area. This takes account of commuting, unemployment and double-jobbing. Employment figures taken from Experian, unemployment rate based on Model-unemployment figure obtained from NOMIS. Data on economically active population taken from NOMIS and reflects the figure for all those over the age of 16. Data for each metric was obtained for the period between 2012 and 2020. The LF Ratio has been increased gradually from the figure of 0.7155 for 2020 to the past average figure of 0.7315 and then held constant.						
Constraints	Population constrained to reflect 2014 SNPP.	No constraints applied.	Jobs constrained to reflect the level of growth identified by each of the forecast models for the period from 2021 to 2039, as summarised below:				Households constrained to reflect Standard Methodology for Warrington (816 dpa).
			8,500 = 447 dpa (2020-2039).	36,263 = 1,909 dpa (2020-2039).	13,045 = 687 dpa (2020-2039).	18,414 = 969 dpa (2020-2039).	Mid-point of OE and CE figures: 15,729 = 828 dpa (2020-2039).



Appendix 2 Note B - Housing Land Supply Technical Note

**Warrington Updated Proposed
Submission Version Local
Plan (2021)
Housing Land Supply
Technical Note**

Housing Consortium

November 2021

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1.0 Introduction

- 1.1 This Note has been prepared by Lichfields on behalf of a Consortium of developers and housebuilders operating in the Warrington and wider North West housing market. This includes Ashall Land, Barratt Developments (Barratt Homes and David Wilson Homes), Metacre Ltd, Satnam Group, Story Homes, and Wainhomes [the Consortium]. This Note has been prepared in response to the consultation on the Warrington Updated Proposed Submission Version Local Plan [UPSVLP] and in particular focuses on the proposed approach to housing delivery over the plan period.
- 1.2 This Note forms part of the evidence underpinning the Consortium's detailed response and should be read in conjunction with the main Issues Report and other associated Technical Notes. It focuses solely on matters relating to housing land supply and substantiates the key points raised in Issue 3 of the Issues Report.
- 1.3 The Consortium acknowledges the work involved in the preparation of the Warrington Submission Version Local Plan and its associated evidence base including the Strategic Housing Land Availability Assessment (2020) and Fiddlers Ferry Regeneration Vision.
- 1.4 However, having reviewed the claimed housing land supply set out in the Council's evidence, the Consortium is of the opinion that the Council has exaggerated the claimed supply position in an attempt to reduce the overall proportion of Green Belt release required to meet the identified needs. It is considered that limited regard has been had to the definition of developable in the context of the definition of the Framework [Annex 2] and the evidence required to meet this test.
- 1.5 The Consortium reserves the right to undertake further detailed analysis of the sites assessed in this Review or further analysis of other sites if required as part of its representations and Matter Papers for the forthcoming Examination in Public.

Approach to this Review

- 1.6 The Consortium has considerable concerns in relation to the claimed housing land supply position as set out in the UPSVLP and its associated evidence base. The concerns centre mainly on the quantum of dwellings which will be delivered on the identified sites but also the type of dwellings and the ability to deliver sufficient affordable homes to meet the identified needs. With this in mind, the Consortium wishes to highlight its concerns by undertaking a detailed site by site assessment of a selected proportion of the claimed supply in the UPSVLP.
- 1.7 The Plan states that 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 SHLAA, which apparently have a claimed deliverable capacity for a minimum of 11,785 new homes. The remaining supply will come from Green Belt release and a 1,458 windfalls/small sites allowance, with the renamed South East Warrington Urban Extension contributing 4,200 homes of which a minimum of 2,400 will be delivered in the Plan Period; Fiddler's Ferry, delivering 1,760 homes of which 1,310 will be delivered in the plan period as part of a wider mixed use development; and Thelwall Heys, providing 310 homes. A minimum of 801 homes will also be delivered on allocated sites to be removed from the Green Belt adjacent to the outlying settlements of Croft (75 units), Culcheth (200), Hollins Green (90), Lymm (306) and Winwick (130).
- 1.8 The housing trajectory indicates that the housing supply could equate to 16,676 homes over the Plan period, factoring in a modest flexibility factor on top of the LHN.

- 1.9 **The Consortium proposes to undertake an assessment of all sites with capacity of 50 or more units excluding the proposed outlying Green Belt releases.** At this stage, no site with capacity of less than 50 has been reviewed but we reserve the right to extend the scope of our analysis to inform our Matter Papers if required.
- 1.10 We will also assess the assumptions applied by the Council and robustly evaluate the developability assumptions of part of the Council's supply. This will also include an assessment of the Council's windfall allowance and other methodological concerns.
- 1.11 It is also worth noting that this Technical Paper does not evaluate the prospects of securing the claimed dwellings from the Fiddlers Ferry site. A separate Technical Paper dealing with the Fiddlers Ferry site has been prepared.
- 1.12 The combined capacity of the 44 sites assessed is 7,152, 43% of the Council's overall claimed supply (16,606 dwellings). It is considered that assessing a significant proportion (almost half) of the supply in detail is comprehensive and logical as it assesses the potential of a significant proportion of the overall supply in Warrington and the timely delivery of the sites will be fundamental to the success of the Plan.
- 1.13 Ensuring a constant deliverable supply that meets the housing needs identified over the Plan period is of paramount importance to the soundness of the plan. The aim of the Consortium in preparing this Housing Land Supply analysis is to demonstrate the issues associated with the claimed supply. **These issues can only be addressed through the identification of additional allocations within the Plan. The Council has overestimated the developable capacity of their claimed supply and the plan will fail to meet its stated objectives, and the objectives of national policy to boost the supply of housing [The Framework §60 & 68].**
- 1.14 As set out above, the scope of the housing land supply analysis may be extended in the future to focus on additional sites or if additional evidence is released by the Council ahead of any Examination in an attempt to justify their supply.

Structure of the Document

- 1.15 The Housing Land Supply report is structured as follows:
- Section 2: Provides a review of the relevant national planning policy relating to housing delivery and Local Plan making
 - Section 3: Sets out analysis of the relevant content of the Updating Proposed Submission Version Warrington Local Plan
 - Section 4: Seeks to set out the overarching methodological concerns associated with the Council evidence and in particular the latest version of the Council's SHLAA
 - Section 5: Provides an assessment of the sites where the Consortium challenges the Council's claimed housing land supply position and provides reasoned justification for an alternative rate of delivery
 - Section 6: Aside from the site-specific issues, the Consortium has a number of other issues with the claimed supply which are detailed in this section
 - Section 7: Seeks to concisely conclude the housing land supply analysis.

2.0 Policy Context

Introduction

2.1 This section of the report sets out the key national planning policy considerations which the emerging Warrington Local Plan will be tested against at Examination.

National Planning Policy Framework

2.2 The Framework sets out that the planning system should be genuinely plan led with succinct and up-to-date plans providing a positive vision for the future of an area [§15]. In terms of housing, the Framework seeks to support the Government's objective of significantly boosting the supply of homes by ensuring that a sufficient amount and variety of land can come forward where it is needed [§60].

2.3 The Framework [§68] goes on to note that:

"Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

A) Specific, deliverable sites for years one to five of the plan period; and

B) Specific, developable sites or broad locations for growth, for years 6-10 and, where possibly, for years 11-15 of the plan"

2.4 Annex 2 of the Framework seeks to define the terms 'deliverable' and 'developable'. For a site to be included in a SHLAA, it must be considered developable, which is defined as:

"To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged".

2.5 For a site to be considered deliverable and included in the first 5 years, the Framework states:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

2.6 In terms of windfalls, the Framework [§71] sets out that where an allowance is to be made for windfall sites as part of anticipated supply:

"there should be compelling evidence that they will prove a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."

- 2.7 The Framework [§73] sets out that the supply of large numbers of new homes can often be best achieved through planning for larger scale development. In doing so, it states, amongst other considerations that, they should:

"make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation".

National Planning Policy Guidance

- 2.8 The National Planning Practice Guidance [ID: 3-001-20140306] sets out that the assessment of land availability is an important step in the preparation of Local Plans.

- 2.9 The Practice Guidance states that:

"An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment is an important source of evidence to inform plan-making and decision-taking, and the identification of a 5-year supply of housing land.

An assessment should:

- *Identify sites and broad locations with potential for development;*
- *Assess their development potential; and*
- *Assess their suitability for development and the likelihood of development coming forward (the availability and achievability)" [ID: 3-001-20190722]*

- 2.10 In terms of timescales for delivery and rates of development, the Practice Guidance states that:

"information on suitability, availability, achievability and constraints can be used to assess the timescales within which each site is capable of development. This may include indicative lead-in-times and build-out rates for the development of difference scales of sites ... The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year." [ID: 3-022-20190722].

- 2.11 In terms of including a windfall allowance in the housing land supply trajectory, the Practice Guidance states that one may be justified "...if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework." [ID: 3-023-20190722].

3.0 Updated Proposed Submission Version Warrington Local Plan 2021

Introduction

- 3.1 This section of the report seeks to provide a brief overview of the relevant housing land supply considerations associated with the emerging Warrington Local Plan. In particular, it focuses on the changes which have taken place between this version and earlier iterations of the Plan and sets out the claimed housing land supply position over the Plan period.

Consideration of Issues

- 3.2 The UPSVLP seeks to set out a vision for Warrington's future development to 2038. The Vision for the Plan (Point 2) seeks to ensure that new homes, jobs and businesses are supported by major improvements to the Borough's infrastructure, to the benefit of existing and new communities alike. Furthermore, Point 5 of the vision sets out that new housing development will support Warrington's economic growth and will be focused on creating attractive, well designed, sustainable and healthy communities. New homes will meet a wide range of needs including those of families, those struggling to afford their own home, elderly people and disabled people.
- 3.3 There is a recognition in the Plan that the previous focus on using brownfield land to meet the towns housing and employment needs has now meant that Warrington is now running out of such land and '*supply is dwindling*' [§2.1.12]. It also states that the town is encountering housing affordability issues, with this being a particular problem for younger people and young families.
- 3.4 In terms of the housing requirement and the housing land supply, the Plan (Policy DEV1 – Housing Delivery) sets a housing requirement of 14,688 new homes over the Plan period 2021-2038 which equates to 816 homes per annum. In terms of supply, the policy indicates that the SHLAA identified a deliverable capacity for a minimum of 11,785 new homes to 2035. The Plan anticipates that 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 SHLAA.
- 3.5 The supply identified in the SHLAA is supplemented by a number of sites to be removed from the Green Belt and allocated for residential development: South East Warrington Urban Extension; Land at Fiddlers Ferry; and Thelwall Heys. A number of small additional allocations will be removed from the Green Belt to meet future needs in the settlements of Croft, Culcheth, Hollins Green, Lymm and Winwick.
- 3.6 The UPSVLP has undergone a number of significant changes since the previous iteration of the Plan (2019) including a reduction in the number of houses required and a reduced plan period which in turn resulted in the removal of the number of sites required to be removed from the Green Belt. The draft allocations removed:
- South West Urban Extension (1,600 homes)
 - Phipps Lane, Burtonwood Village (160 homes)
 - Massey Brook Lane, Lymm (60 homes)
- 3.7 The Plan also seeks to move away from the Garden suburb concept in South Warrington (4,200 homes previously), and instead now includes a new proposal for the South East Warrington Urban Extension with a reduced capacity of 2,400 new homes in the Plan period.

- 3.8 Finally, the Plan seeks to introduce one significant site into the Plan at the Former Fiddlers Ferry Power Station following its closure as a power station in March 2020. The Plan anticipates the delivery of 1,310 dwellings within the Plan period with a further 450 dwellings beyond the Plan period. A separate Technical Note has been prepared relating to the delivery of the Fiddlers Ferry site.

Principle Issues with the Claimed Supply

- 3.9 The Consortium has a number of overarching issues with the supply which will be dealt with in detail within this Supply Note but in summary includes:
- 1 There is a lack of sufficient information in relation to the developability of a significant proportion of the claimed supply . The Council has not demonstrated that all the sites included in the supply meet the definition of developable in the context of the Framework [Annex 2].
 - 2 The Council’s DEV1 Policy indicates that the SHLAA identifies a capacity to deliver 11,785 new homes. However, this is incorrect, the Council’s latest SHLAA (2020) indicates a supply of 10,430 dwellings. Therefore, there is an unexplained allowance of 1,355 dwellings in the Council’s supply.

As a note and notwithstanding the aforementioned issue with the SHLAA total supply, Policy DEV1 states that the SHLAA ‘*identified deliverable capacity for a minimum of 11,785 new homes*’. However, we are of the opinion that the Council intended to use the word ‘*developable*’ instead of ‘*deliverable*’ as defined in Annex 2 of the Framework.
 - 3 The Consortium is of the opinion that the Council has not adopted a realistic and justified approach to deriving capacities and densities. The Council has sought to overestimate the densities deliverable on sites in the urban areas to artificially inflate the claimed supply.
 - 4 The windfall allowance included in the supply is exaggerated and should not make allowances for delivery in years 1 – 3.
 - 5 Warrington cannot demonstrate a deliverable 5-year supply of housing land. Rather than pursuing a solution to the issue, the plan unjustifiably tries to push the requirement to later in the plan period, ignoring the current housing crisis, with the sole intention of being able to artificially claim a 5 year supply of housing land.
 - 6 The claimed supply will deliver a disproportionate supply of smaller apartment type development of a homogenous nature and pays no regard to what the Council needs to deliver; and, in particular the need identified in the Council’s own evidence to deliver 65% 3 & 4 bed family homes to align with future needs.

4.0 **Methodological Concerns**

Introduction

- 4.1 The Consortium has overarching concerns with the methodology set out in the SHLAAA and the inconsistent approach taken by Warrington in applying their methodology to the delivery of sites. Some of the assumptions used to derive the methodology are not grounded in any commercial reality and do not fully understand the complexity of delivering housing developments particularly on larger sites.

Consideration of Issues

- 4.2 At the outset, the Consortium would like to express concerns with the approach being taken by the Council in the preparation of their SHLAA. As well as the issues with the approach being taken by Warrington, it is disappointing that the SHLAA and the housing trajectory hasn't been updated to align with the Plan period. In fact, the SHLAA only goes to 2035 when the Plan period runs for a further 3 years. It is not clear which sites the Council have accounted for in the later part of the plan period which affects the Consortium's ability to properly interrogate the Council's supply and brings into question the transparency of the process.
- 4.3 The level of detail within the respective SHLAAs for each of the proposed sites is limited and insufficient to appropriately justify the expected level of completions across the district and demonstrate their developability in the context of the requirements set in the Framework. It is unclear if this approach was a tactic of the Council to avoid scrutiny of their assumptions and the quality of the evidence underpinning the plan; but in any regard is insufficient and flawed.
- 4.4 For all sites without planning permission included in the supply trajectory, the Consortium members would expect a level of information to be supplied which justifies the inclusion of a site. This could include information from developers and landowners demonstrating their site is available as well as other technical information to demonstrate there are no substantive issues precluding its delivery and justification for the claimed capacity for the site. This level of information has not been provided on the majority of the sites included in the supply trajectory. This is a particular issue for a large number of sites in the urban area which are expected to deliver in years 6-15. Very limited information has been provided and a large number of the sites in the urban area are in active employment or retail use, or adjacent to conflicting land uses such as industrial estates.
- 4.5 The Framework [Annex 2] is clear that for a site to be included in the trajectory for a plan it should be a suitable location for housing, with reasonable prospects that it will be available and viable at the point envisaged. However, in the opinion of the Consortium, insufficient information has been included to explain and substantiate the rationale behind including the sites.
- 4.6 Although the Council has produced proformas for each of the sites included in the SHLAA, the level of information is limited and for a number of the urban sites, it relies upon the Town Centre Masterplan document as justification for the delivery rates. However, the Consortium has significant concerns in relation to the Town Centre Masterplan and the weight that can be afforded to it which we will deal with in more detail later in this assessment.

Claimed Supply

- 4.7 As mentioned earlier, UPSVLP Policy DEV1 sets out that the SHLAA identifies a developable [sic] capacity for a minimum of 11,785 new homes. The latest SHLAA which has been released to support the UPSVLP of the Local Plan is dated 2020. The SHLAA 2020 sets out a total

supply of 10,430. Policy DEV1 explicitly states that the supply in the SHLAA is 11,875 and therefore there is an unexplained allowance for 1,355 dwellings. This is a fundamental concern and undermines the credibility of the Council's evidence and the transparency in the process.

- 4.8 We have contacted the Council for an explanation on the divergence between the claimed supply in the UPSVLP and the stated supply in the SHLAA 2020. The Council have responded via an email from Kevin Usher (Principal Planning Policy Officer) on 11th October 2021 (Appendix 1) and indicated that:

However, the main reason why there is a difference between the SHLAA 2020 figure (10,430) and the urban capacity figure quoted in the Updated PSVLP (2021) (11,800) is because this figure is for the full Plan Period of 18 years (not the 15 years that the SHLAA works to). In addition, it should be noted that the Housing Trajectory (Appendix 1) in the Updated PSVLP (2021), which the urban capacity figure is derived from, uses the 2021 SHLAA data (not yet published), as opposed to the 2020 SHLAA information.

- 4.9 The Consortium is of the opinion that this explanation is unsatisfactory as the Council are effectively claiming they can deliver an additional 1,355 dwellings without indicating the sites in which these dwellings will be delivered on or provide any analysis to demonstrate their developability. No scrutiny of the Council's full supply can be undertaken and this is a fundamental failing of the Council's evidence. It is simply the wrong approach to take by the Council. As such, the additional supply which the Council claim for the last 3 years of the Plan from urban sites cannot be accounted for as no evidence is available in relation to these sites.
- 4.10 The approach being taken by the Council is misleading and is not sound as the claimed supply of 11,755 is unjustified. It is also disappointing that the Council is considering releasing a new SHLAA later this year once the consultation period closes on the Local Plan. It is unclear why the Council could not have updated and released their evidence at the same time as the Local Plan consultation and this approach does not represent transparent or good planning practice.

Density

- 4.11 Policy DEV1 of the Warrington Local Plan sets out that residential development sites should optimise the amount of housing developed on sites and sets the following minimum densities:
- a At least 130 dph on sites within the defined Town Centre of Warrington;
 - b At least 50 dph on sites that are within the wider Town Centre Masterplan and adjacent to district centres or other locations well served by frequent bus or train services;
 - c At least 30 dph on other sites that are within an existing urban area
- 4.12 The Consortium is of the opinion that the density of 130 dph and 50 dph are too prescriptive and there may be instances where the delivery of this rate is inappropriate. It also bears no regard to the identified needs in the SHMA for 65% of future market dwellings to comprise 3 and 4 bed dwellings. It is difficult to comprehend how schemes delivering 130 dph could deliver any 3 and 4 bed dwellings. It is imperative that all policies contained within plans are in sync and align when read as a whole. Given the number of units which the Council is anticipating will be delivered in the Town Centre and the adjacent district centres within the urban area, it is impossible to see how the objective of delivering a large proportion of 3 and 4 bed dwellings to meet needs will be achieved. As such, there is a considerable risk that this plan will provide the wrong dwelling type to meet needs.
- 4.13 The evidence to justify the proposed minimum densities is set out in Appendix 4 of the SHLAA 2020. The evidence presented in Appendix 4 is very dated with a number of the permissions dating back to 2000, 2003 and 2004. Furthermore, the most recent permission being relied

upon in Appendix 4 is from 2018 (Ref: 2018/31871) which received permission on 13th December 2018 (almost 3 years ago). It is unclear why no more up to date applications were considered in the formulation of this piece of evidence. It is also worth considering that the evidence used to support the proposed densities dates from a different time period and additional requirement such as Biodiversity Net Gain, POS policy requirements and M4(2) & M4(3) requirements haven't been fully taken into account.

- 4.14 Not only that, there is no indication of whether any of the permissions stated in Appendix 4 have actually been delivered. Securing permission on a site for a specific density is only part of the story and delivering high density schemes is often complicated, and permissions can lapse. Rather than relying purely on permissions, it would be more appropriate to only rely on permissions which have been delivered.
- 4.15 Setting aside our concerns with the densities being applied in the Council's evidence base, we are even more concerned by the densities being advocated for in the Warrington Town Centre Masterplan. To justify the delivery of 8,000 dwellings in the Town Centre area, the masterplan sets out that *'the intention is to achieve residential densities of 240 units per hectare in the heart of the Town Centre'*. Delivering a density of 240 dph in Warrington is extremely challenging for a number of reasons but not only that, it will be impossible to deliver any family homes to accord with the mix set out in the Housing Needs Assessment at such a density. It is not clear why there is such a mismatch between the suggested density in Policy DEV1 and the density used to derive a capacity of 8,000 units in the Council's Town Centre Masterplan. This brings into question, the deliverability of the claimed supply of 8,000 units as identified in the Masterplan and the misalignment between the Council's evidence base. We assess a number of the sites in turn later in this supply assessment.

Lead in times

- 4.16 Table 2.2 of the SHLAA 2020 sets out lead-in-time assumptions which have been applied to sites. The lead in times are split into two size categories: below 150 dwellings; and over 150 dwellings. The Consortium are of the opinion the approach being taken is simplistic and given the presence in the supply of a number of larger development sites, at least 1 further category for larger sites needs to be added.
- 4.17 The larger the site, the more complex it can be to deliver and as such additional categories are required. It is imperative that the lead in times applied are not overegged, are realistically achievable and grounded in reality. For instance, determining complex large-scale planning applications has become a long and slow process compounded by staffing issues at local authorities and with various statutory consultees. This not only affects the determination of the original planning application but also any amendments to the permission and subsequent discharge of conditions.
- 4.18 If the lead in time assumptions are exaggerated at any stage of the Plan preparation in an attempt to artificially boost the claimed supply, it will ultimately result in the failure of the Plan and a continuation of Warrington's existing issues with demonstrating a deliverable 5 year supply of housing land and continued failure of the Housing Delivery Test. More realistic lead in times should be applied to sites and if this results in a shortfall, it is imperative that additional allocations are included in the Plan.

5.0 Site Analysis

Introduction

5.1 This section of the report sets out in detail the key issues on a site by site basis with the Council's supply. It focuses solely on the sites which the Consortium has concerns with. Where the Council's claimed supply is reduced or pushed back to later in the plan period, a detailed explanation and rationale for the alteration is provided.

Consideration of Issues

5.2 Following an initial assessment of the Council's claimed supply evidence, the Consortium was concerned about the developability of a significant proportion of the supply, particularly a number of sites anticipated to come forward in year 6 – 15 which did not benefit from planning permission. To assess a proportion of the supply and substantiate the concerns, the Consortium has decided to undertake a detailed analysis of all sites in the Council's delivery trajectory with a claimed capacity of 50+ units. It is considered that the 44 sites with capacity to delivery 50+ dwellings make up a sizeable proportion of the Council's overall supply (43%) and represents a reasonable sample size for the purposes of substantiating the Consortium's concerns. To reiterate, we have not assessed the capacity of sites below 50 units at this stage and are not endorsing the full supply claimed from these sites.

5.3 It is important to note at the outset that in undertaking this analysis we are not endorsing the approach or providing the full suite of robust evidence that the Council should be presenting. We are also adopting some of the assumptions accepted by the Council, for example delivery rates and the distribution of development. We have also adopted a generous approach rather than be unnecessarily pessimistic.

Methodology

5.4 The approach used by the Consortium in this review involved an initial desktop appraisal of each site which included reviewing its designation, previous planning history and land ownership, surrounding land uses and its suitability and sustainability as a site for residential development. The desktop assessment also considered physical, environmental, infrastructural and any other obvious constraints which may impede the potential development of the proposed site.

5.5 Following the desktop assessment, a site visit was conducted at each of the examined sites to validate any significant concerns, identify any other issues that which may have remained absent from the desktop study, and to determine the perceived progress of development on sites where construction has commenced.

5.6 Upon conclusion of the analysis undertaken, the Consortium consider the claimed supply of 7,152 from the reviewed sites as being overestimated or insufficient information has been provided to satisfy the requirements of the Framework and be termed developable. The sites in question are outlined within the table below:

Table 5.1 Reviewed Site Capacity Analysis

Site Reference (SHLAA)	Site Name	Proposed Unit Capacity	Consortium's Review Capacity / Timescale	Reduction
1752	Former Wilderspool Stadium	160	160 (delivery trajectory pushed into years 6-10)	0

1646	Grappenhall Heys (Remainder)	228	228 (proportion of delivery pushed into years 6-10)	0
1543	Knutsford Road	93	0	93
1642	Bewsey Old Hall	48	0	48
3567	Dallam Lane (West Side)	140	0	140
1541	Arpley Meadows (mid parcel immediately abutting the west coast mainline) (Masterplan Parcel K7)	220	220 (20 units pushed from years 6-10 to 11-15)	0
1633	Arpley Meadows (most western parcel) (Masterplan Parcel K5)	680	275	405
0	Railway Sidings/Depot	87	0	87
3474	Blackburne Arms Public House	59	0	59
1108	Edwards Cheshire	76	28	48
0	Former Mr Smith's Site	198	92	106
0	New Town House	203	203 (delivery trajectory pushed into years 11-15)	0
0	Warrington Civils and Lintels	132	132 (delivery trajectory pushed into years 11-15)	0
1401	Land at Winwick Street	292	123 (delivery trajectory pushed into years 11-15)	169
3568	Warrington Borough Transport Depot	153	0	153
2481	Land enclosed by Hopwood Street, School Brow and Crossley Street	109	0	109
2471	Pinners Brow Retail Park	193	0	193
0	Causeway Park	60	0 (delivery trajectory pushed into years 11-15)	0
0	Go Outdoors	103	103	0
2480	Wharf Industrial Estate	128	128	0
			Total	1,610

- 5.7 **From the analysis undertaken on the selected sites, the Consortium is of the opinion that the developable supply from the sites assessed should be reduced by at least 1,610 dwellings which represents a reduction of 23% of the assessed supply. This represents a considerable proportion of the overall claimed supply (10% of the total supply) from the largest sites. Not only that but it highlights the fundamental flaws with the approach taken in the Council's housing trajectory and substantiates the issues of the Council overexaggerating its claimed supply in an attempt to suppress the need for alternative developable sites to be identified.** It is also likely that similar issues would be identified if a full assessment of all sites within the Council's wider supply was undertaken.
- 5.8 The assessment work also indicates in a number of instances that the Council has overestimated when a site can be delivered. In a number of instances, our analysis indicates that the expected delivery should be pushed from the 6-10 year period to later in the plan period (years 11-15).
- 5.9 Policy DEV1 (Housing Delivery) set out minimum densities for residential development with the defined Town Centre of Warrington, sites adjacent to a district centre and served by frequent bus or train services and within existing urban areas. Where required and in the absence of site-specific information, we have applied the density assumptions set out in the emerging policy. However, the Consortium is not endorsing these densities and in fact consider that they are unrealistic particularly when the delivery of houses is involved.

- 5.10 It is also worth pointing out at the outset that the Council's Housing Needs Assessment Update (August 2021) sets out proposed mixes for market and affordable dwellings to meet Warrington's need. It would appear that the Council's claimed supply pays no regard to their evidence on what the need is.
- 5.11 For example, the Housing Needs Assessment Update recommends that 65% of market units should comprise 3 and 4+ bedroom properties yet the Council's supply will deliver nowhere near this number of larger dwellings. As such, there is a complete mismatch between the supply and the need which will be substantiated further as one interrogates the Council's claimed supply. This is further compounded by the Council's high-density assumptions which will promote the delivery of smaller dwellings over the dwelling sizes identified in their evidence.

Warrington Town Centre Masterplan (2020)

- 5.12 In 2020, Warrington released a Town Centre Masterplan document which outlined that it is a programme of work for public sector partners and a portfolio of investment and business opportunities for the private sector. The aspiration of the masterplan is to create a Town Centre that is a great place to live, work, do business and enjoy.
- 5.13 The Masterplan sets out that high density residential development with more people living in Warrington Town Centre is fundamental to the future of the place and central to the masterplan. The Town itself is divided into 6 Development Quarters and the masterplan indicates that 8,000 new homes will be provided with the Town Centre and Waterfront by 2040. It is anticipated that the 8,000 new homes will be delivered at densities of 240 units per hectare and '*in the form of town houses and apartments*'. The 6 Development Quarters are:
- 1 Time Square & The Cultural Quarter
 - 2 Stadium Quarter
 - 3 Southern Gateways
 - 4 Bank Quay Gateway
 - 5 Eastern Gateway
 - 6 Warrington Waterfront
- 5.14 The Masterplan is solely focused on housing and seeking to provide justification for the proposed 8,000 homes envisaged. However, the Masterplan is deficient in many regards and ignores some of the core fundamental services and provisions required to attract people to live in the Town Centre. Coupled with that, a significant proportion of the proposed development sites identified in the masterplan are occupied by existing employment sites and retail facilities and there is no provision made for their relocation. Not only that, despite claiming that 8,000 dwellings can be delivered in the Town Centre by 2040, there is no reference at all to some of the key services and infrastructure associated with communities and residential development. The Masterplan also ignores the substantial need to deliver larger 3 & 4 bed properties and is fixated on maximising the capacity rather than delivering the right homes to meet needs.
- 5.15 Despite the Masterplan document being 67 pages in length, there is no reference to education provision, health provision, viability of the proposed developments or the delivery of affordable housing. The delivery of adequate education and health services are vital to meet the additional needs generated through the delivery of 8,000 additional dwellings. Not only that, the delivery of up to 8,000 dwellings in this area will put considerable pressure on the existing services and infrastructure and no information has been provided on how sufficient electricity or sewerage infrastructure can be delivered or funded to meet increased demand.

- 5.16 Furthermore, the delivery of high-density sites in urban areas is often difficult for viability reasons and this important aspect has been overlooked. Similarly, Warrington has a significant shortage of and need for affordable housing. It is not clear how many affordable homes will be delivered in the Town Centre and what impact their delivery will have on the viability of schemes. The Council's own evidence on viability demonstrates that the delivery of any affordable housing on schemes render them unviable.
- 5.17 A number of the Consortium members have tried to deliver schemes in the Town Centre of Warrington in recent years and have highlighted a number of key issues and considerations which are likely to affect future development proposals too. In particular, car parking is always a key issue in the determination of planning applications and there is still emphasis on the provision of car parking in line with the Council's Standards for Parking in New Development SPD (2015). This has considerable implications on net developable areas of sites and in particular results in reduced densities being achievable. Not only that, the provision of underground car parking associated with apartments adds considerably to the cost of construction and from experience, the viability of such developments in Warrington Town Centre are marginal at best and in many cases do not stack up without some form of public sector intervention.
- 5.18 Finally, it is clear that the Masterplan area, if successful, will deliver a significant proportion of the overall number of homes required in Warrington. However, given the extremely high density being advocated in the Masterplan document (240 dph), it is impossible to understand how any larger 3 and 4 bedroomed family homes will be delivered.
- 5.19 The members of this Consortium are very experienced developers and housebuilders yet they have never seen town houses or family homes being delivered at an average density of 240dph. Delivering at this density is expected on Deansgate in Manchester, Salford Quays or Liverpool's Waterfront but not Warrington Town Centre. As such, this Plan as drafted will fail in many regards but in particular to meet its aspiration that 65% of dwellings delivered will comprise larger properties.

Former Wilderspool Stadium, Warrington (LF06; SHLAA ref. 1752)

- 5.20 The Warrington SHLAA sets out that the site known as Former Wilderspool Stadium has a site area of 1.89ha and can deliver 160 dwellings in years 1-5 of the plan period. The SHLAA concludes that the site is considered suitable, available and achievable, and notes that the developer for the site is Wire Regeneration (a joint venture between developer Langtree and Warrington Borough Council).
- 5.21 An outline planning application (LPA ref. 2018/33771) was submitted on the site in October 2018 for up to 160 residential units and associated car parking, landscaping and open space with details of access (detailed matters of appearance; landscaping; layout and scale are reserved for subsequent approval). The application is currently pending determination and as such the site does not benefit from an extant permission. The SHLAA states that the outline application has a DM Committee resolution to grant permission subject to a S.106 Agreement being signed. A number of newspaper articles also state that the site has been recommended for approval by Planning Officer's but the S.106 has not been signed.
- 5.22 The site does not benefit from outline planning permission and no reserved matters application can be submitted. Given the passage of time, the outline application may need to be presented to Committee again before formally agreeing the S.106 assuming it progresses. To reiterate, the site does not benefit from planning permission and the Council has not provided evidence that there is a realistic prospect that housing will be delivered on the site within 5 years. The Consortium therefore considers that the site should not be considered deliverable and removed

from the first 5 years. No evidence has been provided by the Council to dissuade this conclusion and it would be unjustified to adopt a different approach on this site.

Conclusion

- 5.23 The Consortium considers that evidence has not been provided to demonstrate that the site is deliverable in the context of the definition of deliverable as set out in the Framework [Annex 2]. Delivery of the 160 dwellings should therefore be pushed into years 6-10 of the plan period albeit this is considered to be a best case scenario as there may be a fundamental issue with the site which could be the reason the S.106 has not been agreed.

Table 5.2 Former Wilderspool Stadium Capacity Analysis

Warrington SHLAA Capacity Analysis			
	Overall Capacity	160	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	160	0	0
Consortium’s Capacity Analysis			
	Overall Capacity	160	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	160	0

Grappenhall Heys (Remainder) (LF21; SHLAA ref. 1646)

- 5.24 The Warrington SHLAA sets out that the site known as Grappenhall Heys (Remainder) has a gross site area of 17.28ha and can deliver 228 dwellings in years 1-5 of the plan period. The SHLAA considers the site to be suitable, available and achievable. The site benefits from outline planning permission (LPA ref. 2017/29929) for the overall Grappenhall Heys site for up to 400 dwellings, which was granted on 18th January 2018. Reserved matters approval has also been secured for this element of the site (LPA ref. 2021/38524) which is identified as Phase 2 of the Grappenhall Heys development. The application was approved on 21st July 2021 for 228 dwellings, new public realm and landscaping, access, parking, play space and associated works.
- 5.25 The SHLAA sets out that all 228 dwellings approved as part of reserved matters approval 2021/38524 will be delivered in years 1-5 of the plan period (2020-2025), although the Consortium considers that this assumption is unrealistic. Approval was secured in July 2021 and a number of conditions have been discharged. However, the Consortium disagrees with the Council’s stated trajectory for the delivery of all dwellings in years 1-5 of the plan period.
- 5.26 The Council’s SHLAA sets out that the lead-in time assumption for sites over 150 dwellings with reserved matters approval is 1.5 years (SHLAA Table 2.2), and the assumed build rate for a site over 150 dwellings is 55 units per year (SHLAA Table 2.3). Using the Council’s own assumptions for average lead-in times and build rate for a site of this capacity, it can be expected that construction of the first dwelling will not commence until January 2023 and 165 dwellings (55 dpa) will be constructed in the proceeding 3 years up to 2026. The Consortium therefore considers that by applying the Council’s own lead-in and build rate assumptions, that only 165 units could reasonably be delivered within years 1-5 of the plan period to 2026.

Conclusion

- 5.27 Based on the above analysis, the Consortium considers that delivery of all 228 dwellings in years 1-5 is not realistic or feasible. Using the Council’s own lead-in and build rate assumptions set out in the SHLAA in the absence of reasonable alternative information from a developer, only

165 dwellings can expect to be delivered up to 2026. 63 dwellings of the overall site capacity have therefore been pushed into years 6-10 of the plan period as necessary.

Table 5.3 Grappenhall Heys (Remainder) Capacity Analysis

Warrington SHLAA Capacity Analysis			
	Overall Capacity	228	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	228	0	0
Consortium's Capacity Analysis			
	Overall Capacity	228	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	165	63	0

Knutsford Road, Latchford (LF39; SHLAA ref. 1543)

5.28

The Warrington SHLAA sets out that the site known as Knutsford Road, Latchford has a gross site area of 2.48ha and can deliver 93 dwellings over the course of the plan period. The SHLAA considers that the site is suitable and achievable, but whilst it is not available at present it is considered developable in the longer term (years 11-15). A significant proportion of the site (western portion) comprises a wooded area with mature trees, with the remaining area to the east of the site comprising vacant land (Figure 5.1) adjacent to an existing employment area.

Figure 5.1 Aerial View of Site ref. 1543



Source: Google Earth (2021)

- 5.29 The SHLAA states that the site is in active use but it is not clear what this use comprises. The site is situated to the north of industrial yards associated with a car repair garage and Yofil Ltd (a wheel wash company), and to the west of the existing Manor Industrial Estate which is occupied by a number of light industrial uses. Based on a desk top review it appears that the site can be accessed from Brook Place but that this access is likely used for maintenance vehicles for the electricity pylon on the site. The access appears constrained and may not be suitable for increased usage. It appears unlikely that sufficient space is available to improve the access arrangements either.
- 5.30 There have been no relevant planning applications for residential development on the site. There have been a number of planning applications for industrial uses on the eastern portion of the site over the past 35 years, although a number of these applications were either withdrawn or refused, and no development has come forward on the site.
- 5.31 The Consortium has significant concerns regarding the developability of the site, particularly in relation to the extensive area of mature woodland covering 3/4 of the site. This is considered a significant constraint to development. Evidence has not been provided by the Council to justify the loss of the area of woodland for residential development, which may have significant implications in relation to loss of biodiversity and a developer's ability to demonstrate Biodiversity Net Gain [BNG] if the area of woodland needs to be substantially removed to facilitate development.
- 5.32 The site is also located in Flood Zone 2. National policy seeks to direct development away from areas at risk of flooding, particularly vulnerable developments such as residential. As such, residential development at this site is not appropriate or acceptable unless extensive mitigation could be put in place to remove the site from the flood zone. The cost of such mitigation could undermine the viability of the development.
- 5.33 There is also an electricity pylon towards the centre of the site and any proposed scheme for residential development will likely require appropriate offsets from the pylon or the potential burying of the powerline which is very expensive. The Consortium also consider that the presence of the electricity pylon is likely to compromise the marketability of the site for housing.
- 5.34 The site is also located adjacent to an existing active industrial estate, and the proposed residential development is considered incompatible with existing surrounding land uses. Furthermore, if the site's technical constraints can be overcome, the site would effectively be surrounded by industrial uses if it came forward for development before the other SHLAA sites immediately to the south (2129 and 1322). This would further compromise the suitability of the site for residential development.
- 5.35 In addition to the above concerns regarding the site's suitability for housing, the Consortium has concerns as to whether an appropriate access to serve proposed residential development is suitable or available. The Council must provide further evidence to demonstrate that the access point from Brook Place represents an appropriate access for a housing development.

Conclusion

- 5.36 It is considered that the Council has not demonstrated that the site has reasonable prospects of being delivered for residential development. It would appear that the Council is pursuing unreasonable sites in an attempt to boost its claimed supply. Additional evidence should be provided to justify the loss of an extensive area of woodland including the necessity for compensatory ecological mitigation. The Consortium also has significant concerns regarding the access point to the site. Furthermore, the site is not considered to be suitable for residential development due to its incompatibility with surrounding land uses. The site is also in Flood

Zone 2 and the required mitigation could undermine the viability of the site if its development can overcome objectives from the EA and LLFA.

- 5-37 The Consortium has reservations about the developability of this site and the Council has provided no evidence to dissuade them of this opinion. As such it is considered that the site should be excluded from the Council's claimed supply until further evidence is available to demonstrate that the site will come forward.

Table 5.4 Knutsford Road Capacity Analysis

Warrington SHLAA Capacity Analysis			
	Overall Capacity	93	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	93
Consortium's Capacity Analysis			
	Overall Capacity	0	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	0

Bewsey Old Hall, Warrington (LF40; SHLAA ref. 1642)

- 5-38 The Warrington SHLAA sets out that the site known as Bewsey Old Hall, Warrington has a gross site area of 3.02ha and can deliver 48 dwellings in years 6-10 of the plan period. The site comprises Bewsey Old Hall (Grade II* listed building which has recently been converted into 7 apartments) and surrounding land.
- 5-39 A planning application (LPA ref. 2007/10550) for the conversion of the existing Bewsey Old Hall building into 7 apartments and the erection of 48 apartments with associated landscaping was submitted on 27th April 2007. The application was refused on 2nd July 2008, though the applicant appealed the decision and the application was allowed on appeal on 29th October 2009. The extent of the application site is shown below in Figure 5.2, which shows the area of the site comprising the proposed 48 apartments.

Figure 5.2 Bewsey Old Hall Application Site



Source: LPA ref. 2007/10550 Site Plan (shedkm)

5.40 As previously noted, the permission has been implemented with the conversion of Bewsey Old Hall, although it appears that the remaining element of the permission (erection of 48 apartments with associated landscaping) has not been implemented. It would appear that construction of the additional 48 apartments has not yet commenced despite the site benefiting from planning permission for over 12 years. It is not clear why the remaining element of the permission has not come forward for development, and the SHLAA does not provide any information in this regard or new evidence that it will come forward.

5.41 Due to the considerable amount of time which has passed since the application was approved, the Consortium has significant reservations as to whether the 48 apartments will now come forward for development. The Council must therefore provide evidence to demonstrate that there is an intention from a developer to deliver the remainder of the permission within the plan period, or the delivery of 48 dwellings should be discounted from the supply.

Conclusion

5.42 The Consortium considers that the Council has not provided sufficient evidence to demonstrate that planning permission ref. 2007/10550 will be implemented in full. The permission was granted in July 2009 but construction of the remaining 48 apartments has not commenced, and there is no available evidence indicating that the remainder of the site will come forward within years 6-10 of the plan period.

- 5.43 The Consortium therefore considers that the site should be discounted from the supply unless the Council can demonstrate that there is developer interest in implementing the full extent of the planning permission, or that a new planning application is due to be submitted.

Table 5.5 Bewsey Old Hall Capacity Analysis

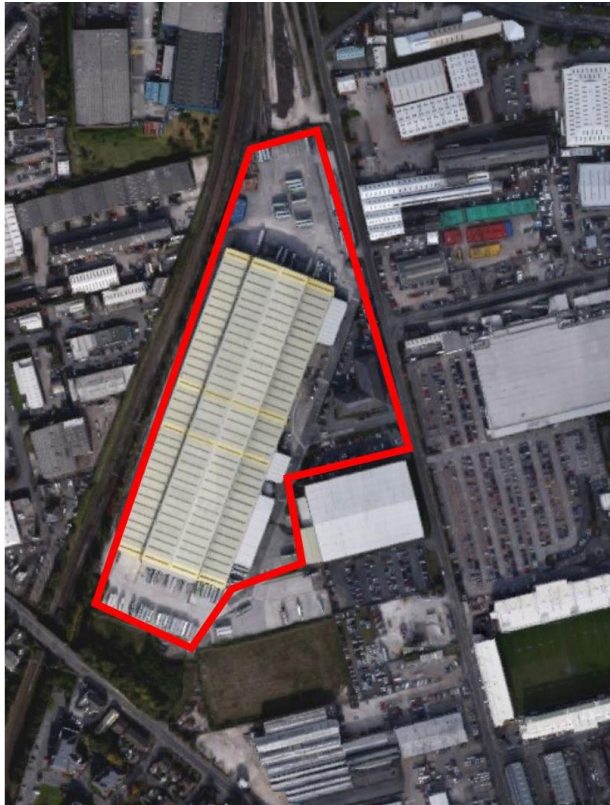
Warrington SHLAA Capacity Analysis			
	Overall Capacity	48	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	48	0
Consortium's Capacity Analysis			
	Overall Capacity	0	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	0

Dallam Lane (West Side), Warrington (LF42; SHLAA ref. 3567)

- 5.44 The Warrington SHLAA sets out that the site known as Dallam Lane (West Side) has a gross site area of 8.07ha and can deliver 140 dwellings in years 11-15 of the plan period. The SHLAA states that the site is considered suitable and is likely to become available and achievable and is therefore considered developable in the longer term (2031-2035).
- 5.45 The site comprises the Warrington 379 industrial/distribution facility which comprises two vacant warehouse units which were previously occupied by Asda. An occupied office building (Dallam Court) is also present on the site. The site is situated within an existing industrial estate and is within the Warrington Town Centre Masterplan area. The west coast main line lies immediately to the west of site with commercial uses to the east and south.
- 5.46 The Consortium understands that the site is currently being marketed¹ as a refurbished industrial / distribution facility. The Consortium is also aware of a planning application on the site (LPA ref. 2021/40222) which was submitted by The Hut Group on 24th September 2021, for the change of use of the existing warehouse from B8 (Storage or distribution) to B2 (General Industrial) for use as a Clean Plastics Recycling Facility (no external alterations) with ancillary office accommodation and parking and the siting of 2 no. external generators. The application site comprises the larger of the two warehouses, with the smaller warehouse (to remain as a storage facility) sitting outside of the red line boundary (Figure 5.3).

¹ <https://www.knightfrank.co.uk/properties/commercial/to-let/warrington-379-dallam-lane-warrington-wa2-7nt/CPD217888>

Figure 5.3 Dallam Lane Planning Application Red Line Boundary



Source: LPA ref. 2021/40222 Planning Policy Statement (Euan Kellie Property Solutions)

- 5.47 The Consortium acknowledges that the site is included within the Warrington Town Centre Masterplan. However, there are significant concerns regarding the site's suitability for residential development and its inclusion as a developable site within the Council's supply. The site is currently vacant (with the exception of the small office building named Dallam Court) although the vast majority of the site is currently the subject of a planning application for a clean plastics recycling facility.
- 5.48 Should this application receive a grant of planning permission in due course, the site would clearly become unavailable if the permission were to be implemented. There is no evidence to suggest that this use would potentially cease in the next 10-15 years and that the site would then become available again later in the plan period. The Consortium considers that for this reason, the site should not be considered developable as there is no reasonable prospect of the site being available. It is also considered that proposed residential development on the site would be incompatible with surrounding commercial and industrial uses and is not a suitable site for housing.
- 5.49 Although the smaller warehouse unit is not situated within the red line boundary of application ref. 2021/40222, the Consortium still considers that this element of the site would not be suitable for residential development given the existing site context and surrounding land uses. Proposed residential development on this element of the site would be entirely incompatible with neighbouring uses, particularly given that it would potentially be situated in direct proximity to a clean plastics recycling facility.

Conclusion

- 5.50 The Consortium considers that the Council has not demonstrated that the site has reasonable

- 5-51 prospects of being delivered for residential development based on its potential availability over the course of the plan period. The site is also not considered to be a suitable location for residential development. The site should therefore be discounted from the Council's claimed supply.

Table 5.6 Dallam Lane (West Side) Capacity Analysis

Warrington SHLAA Capacity Analysis			
	Overall Capacity	140	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	140
Consortium's Capacity Analysis			
	Overall Capacity	0	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	0

Arpley Meadows most western parcel (Masterplan Parcel K5) (LF44; SHLAA ref. 1633) and mid parcel immediately abutting the west coast mainline (Masterplan Parcel K7) (LF43; SHLAA ref. 1541)

- 5-52 The Warrington SHLAA includes two sites known as Arpley Meadows, which are included within the Warrington Waterfront Development Quarter in the Warrington Town Centre Masterplan (2020):
- 1 SHLAA ref. 1633 - Arpley Meadows (most western parcel) (Masterplan Parcel K5) which has a gross site area of 19.46ha. The SHLAA sets out that the site can deliver 680 dwellings over the plan period, with 280 dwellings in years 6-10 and a further 400 dwellings in years 11-15.
 - 2 SHLAA ref. 1541 - Arpley Meadows (mid parcel immediately abutting the west coast mainline) (Masterplan Parcel K7) has a site area of 16.12ha and can deliver 220 units, with 20 units in years 6-10 and a further 200 units in 11-15.
- 5-53 There is limited relevant planning history in relation to both sites. However, a Screening Opinion Request (LPA ref. 2018/33236) was submitted by Ospitium 2 Limited on 16th July 2018, with the proposed development incorporating both sites. The proposed development is for the following:
- “Proposed construction of 1,628 residential units for private sector rental and affordable private rental sector use with associated private and communal gardens and parking; two public parks to be called Haviland Park and Lily Waring Gardens; new public square to be called William Square; new roads and the construction of a section of the Western Link Road with associated bridges; river-walks and new bridges to link the Sites; Site Management Office; NHS GP Surgery and Community Centre; Children's Nursery, Primary and Junior School; together with ancillary playgrounds, and bicycle and refuse enclosures.”*
- 5-54 The Council issued its Screening Opinion on 31st July 2018, which confirmed that the proposed development would require an Environmental Impact Assessment [EIA]. A planning application is yet to be submitted on either site.
- 5-55 The SHLAA states that both sites are considered suitable and likely to become available, but will only be achievable through delivery of infrastructure to overcome existing constraints (expected by 2025). The Consortium understands that the infrastructure being referred to is the Warrington Western Link Road, which is a scheme being brought forward by the Council and

would connect Sankey Way (A57) to the north with Chester Road (A56) to the south when complete. The SHLAA states that the link road will need to be fully operational prior to any residential completions in relation to both Arpley Meadows sites.

- 5.56 The Council published an indicative timescale for the delivery of the scheme which includes a number of project milestones, noting that a planning application was due to be submitted in May 2021 and construction of the scheme was due to be completed in early 2026. It was also noted at the Council's Local Economic Policy Committee held on 14th July 2021 that *'it is anticipated that work will commence on site for the beginning of 2023 and project completion forecast for early 2026, with the highways team currently finalising the Planning Application due to be submitted imminently'*. However, the Consortium understands that an application is yet to be submitted and as such, the Council's claimed timescales for delivery of the infrastructure and the subsequent housing must also be questioned.
- 5.57 It is acknowledged that an application may be submitted soon, although the Council has not provided firm confirmation of this and it is clear that the indicative project timescales have already slipped. Notwithstanding the initial delays in the submission of a planning application, the scheme is not due for completion until early 2026 as a best case scenario, and there is a possibility that these timescales could slip given the size and complexity of the project. As the delivery of residential development on both sites is predicated on delivery of the link road, the Consortium considers that expecting a significant quantum of delivery on the sites in years 2026-2030 is unlikely given the relative uncertainty of when the link road will be completed and operational.
- 5.58 Furthermore, no planning application has been submitted in relation to either site, and the Consortium understands that there are a number of technical constraints that would need to be overcome in order to facilitate delivery of residential development on both sites. This includes issues in relation to access, ground conditions and areas of the sites being located in Flood Zone 3. It is not considered that these additional technical constraints will prevent development on either site. However, overcoming these issues may have a further impact on delivery timescales. When considered alongside the requirement for the link road to be delivered before development can come forward, it becomes clear that the Council's claimed trajectory for both sites is unrealistic.
- 5.59 As such, the Consortium considers that the Council's delivery trajectory should be reviewed and the overall number of units which are claimed to be developable within the plan period on these sites should be reduced.
- 5.60 It is not considered feasible to expect any development on either site in years 6-10 of the plan period. The Consortium therefore suggests pushing the 20 dwellings expected to be delivered on the Arpley Meadows mid parcel (SHLAA ref. 1541) into years 11-15 of the plan period. It is considered that the claimed capacity of 220 dwellings is developable but only in years 11-15.
- 5.61 Regarding the western parcel (SHLAA ref. 1633), the Consortium considers that the 280 dwellings expected to be delivered in years 6-10 should be pushed into years 11-15. However, it is considered that the delivery of all 680 dwellings on this site in years 11-15 would not be realistic or achievable. The Council's SHLAA sets out that the assumed build rate for a site over 150 dwellings is 55 units per year (SHLAA Table 2.3). Adopting a pragmatic approach and assuming the site is granted planning permission sufficiently prior to years 11-15 of the plan period, no more than 275 dwellings can expect to be delivered in years 11-15 when applying the Council's own assumptions for average build rate for a site of this capacity (55dpa). This would reduce the overall capacity of the site in the plan period by 405 dwellings.

Conclusion

5.62 The Consortium considers that the Council’s trajectory for both sites is not realistic or achievable, as the proposed Warrington Western Link Road will need to be fully operational prior to any residential completions on either site. As such, a significant proportion of the claimed supply is not considered to be developable for the Arpley Meadows western parcel (SHLAA ref. 1633) and the remaining supply should be pushed further into the plan period into years 11–15.

Table 5.7 Consortium’s Capacity Analysis - Arpley Meadows Mid Parcel SHLAA ref. 1541

Warrington SHLAA Capacity Analysis – SHLAA ref. 1541			
	Overall Capacity	220	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	20	200
Consortium’s Capacity Analysis			
	Overall Capacity	220	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	220

Table 5.8 Consortium’s Capacity Analysis - Arpley Meadows Western Parcel SHLAA ref. 1633

Warrington SHLAA Capacity Analysis - SHLAA ref. 1633			
	Overall Capacity	680	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	280	400
Consortium’s Capacity Analysis			
	Overall Capacity	275	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	275

Railway Sidings/Depot (Wilson Pattern Street, Warrington, WA1 1PR) [Our Ref. LF24]

5.63 The Railway Sidings/Depot site accounts for the delivery of 87 dwellings on site in the 11-15 year period of the plan. The site is located directly south of the Skelton Junction to Ditton Junction Line, west of the River Mersey and north of the Waterside Hotel. The site currently services the Warrington Network Rail Maintenance Depot and is comprised of a service building, a hardstanding car park and a western parcel of land bordering the railway sidings used as a service yard. The development of the site would seemingly force the relocation of the existing Network Rail Maintenance Depot to an alternative site, though this remains unconfirmed within the evidence provided.

5.64 The site features within the Bank Quay Gateway of the Warrington Town Centre Masterplan which proposes the creation of a mixed-use Central Business District within this region of the Town Centre. However, the Masterplan fails to recognise the array of physical constraints that significantly impede development at the Railway Sidings/Depot site. It should also be noted that the site is currently unavailable and does not benefit from planning approval for residential development.

5.65 The proposed site is not located within a sustainable location as the sole access is located along Park Boulevard and is already shared with the neighbouring businesses (the Waterside Hotel and the Waterside Pub and Grill). The site is also bounded by the railway line to the north and therefore, the site remains disconnected from the wider Town Centre. The accessibility and connectivity of the site to services and facilities should be considered very poor and fails to meet the ethos of the Framework with a *presumption in favour of sustainable development*. (Para. 10).

5.66 Furthermore, though the site is broadly within Flood Zone 1, the eastern part of the site that borders the River Mersey is located within Flood Zone 3. According to the Flood Risk Vulnerability and Flood Zone Compatibility Table outlined by the Department for Levelling Up, Housing and Communities, residential development is classified within the ‘more vulnerable’ category which in turn does not permit development in Zone 3b and requires an Exemption Test in Zone 3a. The presumption of residential development on this site cannot be deemed deliverable or attainable on site until an Exemption Test is conducted and as a result, this site should not contribute towards the housing supply trajectory for Warrington.

Conclusion

5.67 The physical constraints within the development area which include Railways Sidings/Depot are not conducive to a residential development. The site is unavailable and still services an existing occupier. It is located within an unsustainable location and faces significant flood risk challenges. Therefore, the site is considered unsuitable for residential development and the allocated units should be removed from the housing land supply trajectory.

Table 5.9 Railway Sidings/ Depot Site Capacity Analysis

Warrington Local Plan (2021)- Site Capacity and Trajectory			
	Overall Capacity	87	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	87
Consortium's Capacity Analysis			
	Overall Capacity	0	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	0

Blackburne Arms Public House (Orford Green, Orford, Warrington, WA2 8PL) [Our Ref. LF25]

5.68 The Blackburne Arms Public House site accounts for the delivery of 59 units in the 6-10 year period of the plan within the housing supply trajectory for Warrington. The site is located north of the Town Centre in Orford and remains in operation as a public house. The Blackburne Arms is located south of the A50 School Road, west of the Blackburn Arms Hotel, east of a parcel of land comprising allotments and north of Orford Park. The overall site comprises an area of 0.5ha and the site is wholly within Flood Zone 3.

5.69 The Blackburne Arms Public House site has been subject to a number of a recent planning applications regarding the proposed delivery of residential units on site. A full planning application was submitted to the Council on the 25th March 2019 for the ‘*demolition of existing public house and construction of 63 affordable retirement units and 2x bungalows (totalling 65 dwellings) and associated landscaping*’ [ref. 2019/34688], though the application was formally withdrawn on the 20th June 2019.

5.70 A second application with a reduced site capacity of 52 dwellings was made by the applicant and was refused on the 10th March 2020 [ref. 2019/35678]. The applicant sought an appeal on this revised application though this was dismissed on multiple grounds by the Inspector on the 1st February 2021 (APP/M0655/W/20/3255990) because of the detrimental impact on the character and appearance of the area, the loss of a public house for the community, increased traffic and flood risk concerns.

5.71 The Blackburne Arms Public House is included within Appendix 4: Historic Assets of the Core Strategy 2014 as a locally listed building. Historic England state the designation of a building as a locally listed asset emphasises the conservation of the building as a heritage asset as outlined within the Framework to ensure the retained contribution towards sustainable communities (Para. 197). The Public House has also been designated as a Community Asset further strengthening the obstacles to its redevelopment.

5.72 In addition, this designation should also be of material consideration in determining planning applications and this was exercised by the Inspector during the Appeal. The Inspector highlighted the significance of the Blackburne Arms as both a heritage asset and in terms of its contribution towards the preservation of sustainable communities. The demolition of the public house would violate Policy QE7 (Ensuring a High Quality of Place) concerning character and appearance of the local area, and Policies SN6 (Sustaining the Local Economy and Services) and SN7 (Enhancing Health and Wellbeing) of the 2014 Local Plan Core Strategy. Overall, the Inspector concluded that *‘the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits.’*

Conclusion

5.73 It should be noted that this appeal took place after the publication of the 2020 Warrington SHLAA and this has a material impact on the developability of this site. In conjunction with the impact of the other physical constraints on site including the risk of flooding, this site is not considered suitable for residential development on the grounds of heritage concerns and the evident significance of the Blackburne Arms Public House in the preservation and vitality of sustainable communities. Therefore, the delivery of dwellings within this site is untenable and the associated units should subsequently be removed from the Warrington housing supply trajectory.

Table 5.10 Blackburne Arms Public House Site Capacity Analysis

Warrington Local Plan (2021)- Site Capacity and Trajectory			
	Overall Capacity	59	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	59	0
Consortium’s Capacity Analysis			
	Overall Capacity	0	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	0

Edwards Cheshire (Navigation Street, Warrington, WA1 2EL) [Our Ref. LF26]

5.74 The Edwards Cheshire site accounts for the delivery of 76 dwellings towards the housing supply trajectory in the 11-15 year period of the proposed plan. The site is currently derelict and serves no direct function. Existing residential development meets the proposed site to the east and west and the site is bounded by the River Mersey to the south. A designated Existing

Employment Area (Policy PV1) is located to the north, whilst smaller industrial units also meet the northern boundary of the site but remain outside of the Employment Area. The proposed site is wholly located within Flood Zone 2 and does not benefit from the flood defences located further south along the river.

5.75 The Edwards Cheshire site has previously received permission for residential development and therefore, the site is considered suitable for development to a certain extent. An outline application for a residential scheme comprising 77 one and two bedroom apartments received permission on the 21st July 2004 (Ref. 2003/01486). Reserved Matters approval was granted (Ref. 2007/10238), and a Section 1.06 signed on the 6th September 2007, but the development never commenced.

5.76 In addition, the neighbouring Howley Quay development to the east of the site received planning permission for 20 apartments and 17 dwellings on the 17th April 2014 (Ref. 2014/23145). This development has since been completed and constitutes a dph of 65. It should be noted that at the time of permission being granted the existing development plan policies for Warrington did not outline proposed densities within its jurisdiction.

5.77 As expressed, the Edwards Cheshire site accounts for the delivery of 76 dwellings across a 0.56ha which equates to 135 dph within the housing supply trajectory. The site is not located within the defined Town Centre, nor is it located within the comparably wider area included within the Warrington Town Centre SPD. The Submission Document Warrington Local Plan 2021 outlines that developments located within the wider Town Centre Masterplan area should achieve a density of at least 50dph in Policy DEV1 (Housing Delivery) and therefore, the Consortium suggest that a more appropriate capacity for the site based on 50dph would constitute a development of 28 dwellings. In the absence of any substantive information provided by the Council, we have to apply the approach set out in the SHLAA & UPSVLP.

Conclusion

5.78 As a result, the Consortium considers that the proposed site capacity should be amended to account for 28 dwellings in accordance with the policy outlined within the emerging Local Plan. It is considered that these units will be delivered within the 11-15 year period of plan, as it expressed within the current housing supply trajectory.

Table 5.11 Edwards Cheshire Site Capacity Analysis

	Warrington Local Plan (2021)- Site Capacity and Trajectory		
	Overall Capacity	76	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	76
	Consortium's Capacity Analysis		
	Overall Capacity	28	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	28

Former Mr Smiths Site (Wilson Patten Street, Warrington, WA1 1HN) [Our Ref. LF27]

5.79 The Former Mr Smiths Site accounts for the delivery of 198 dwellings within the housing land supply trajectory in the 6-10 year period of the proposed plan. The site formerly comprised a nightclub but now functions solely for car parking. The site is bounded by the River Mersey to the east, the Skelton Junction to Ditton Junction Line to the south, and Bridgefoot Road to the north. It should be noted that the neighbouring Warrington Civils and Lintels units to the west

also features as a site within the housing supply trajectory and both feature within the Bank Quay Gateway within the Warrington Town Centre Masterplan.

5.80 The site is partially included within Flood Zone 2 though it is largely comprised of Flood Zone 1 land. There are few physical constraints considered relevant that would impede the provision of residential development on the site as well as the potential for land contamination that is outlined within the SHLAA. Furthermore, it should be noted that there are a number of listed heritage assets within a 50-metre radius of the site including the K4 telephone kiosk, Statue of Oliver Cromwell, the Old Academy, so design must be informed by these heritage assets.

5.81 The UPSVLP outlines in Policy DEV1 that sites within the defined Town Centre should deliver a capacity of at least 130dph. The current housing trajectory proposes 278 dph and this is deemed to be of excessive scale as existing residential developments on the opposite side of Wilson Patten Street are of a significantly lower density than even the 130dph expressed within the UPSVLP. There are three separate sites located along Wilson Patten Street and the other sites (Civils and Lintels and Go Outdoors) both propose a density of 130dph. Therefore, it is considered that the capacity of the Former Mr Smiths Site should be reduced to ensure a consistent approach and a density of 130dph outlined within Policy DEV1 should be applied. It is worth noting that the Consortium has not sought to reduce the developable area due to flood constraints but this consideration may need to be factored in also.

Conclusion

5.82 As a result, applying a density of 130dph to the 0.71ha net site presents an overall capacity of 92 dwellings. The Consortium is of the opinion that the delivery of 92 dwellings in years 11-15 is considered a developable and achievable capacity of the site.

Table 5.12 Former Mr Smiths Site Capacity Analysis

Warrington Local Plan (2021)- Site Capacity and Trajectory			
	Overall Capacity	198	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	198
Consortium's Capacity Analysis			
	Overall Capacity	92	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	92

New Town House (Buttermarket Street, Warrington, WA1 2NH) [Our Ref. LF28]

5.83 The New Town House site accounts for the delivery of 203 dwellings towards the housing land supply in the 6-10 year period of the proposed plan. The New Town House building comprised the former Warrington Borough Council Offices prior to their relocation to Time Square. The site is located at the heart of the defined Town Centre and is surrounded by commercial, office and residential land uses. The site is considered suitable for development upon the demolition of the current building.

5.84 An application was submitted in June 2020 to determine whether prior approval was required for the proposed demolition of the New Town House building. The application was approved in the same month. Demolition was set to begin in 2021 though it has yet to commence. As of August 2021, consultation responses indicate that if demolition does not commence by Spring 2022, new ecology reports will be required.

5.85 From the outset, as the scheme does not currently have planning permission or a live application for development the proposed site cannot be seen as attainable within a five-year period in accordance with the Framework’s definition of a ‘deliverable’ development. Given the uncertainty on the delivery of the site, the Consortium considers that the proposed 203 dwellings should be pushed back into the final 11-15 year period of the plan as there is no evidence to indicate it will come forward sooner.

Conclusion

5.86 The 203 dwellings associated with the New Town House site are considered developable but a revision to the delivery rate further back into the 11-15 year period of the plan presents an attainable rate of development.

Table 5.13 New Town House Site Capacity Analysis

Warrington Local Plan (2021)- Site Capacity and Trajectory			
	Overall Capacity	203	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	203	0
Consortium’s Capacity Analysis			
	Overall Capacity	203	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	203

Warrington Civils and Lintels (Wilson Patten Street, Warrington, WA1 1HN) [Our Ref. LF31]

5.87 The Warrington Civils and Lintels site accounts for the delivery of 132 dwellings towards the housing land supply across the 6-10 year period of the plan. The site is located within the Bank Quay Gateway Quarter of the Warrington Town Centre Masterplan and borders both the Go Outdoors site to the west and the Former Mr Smiths site to the east. The site is also bounded by the Skelton Junction to Ditton Junction Line to south. The site continues to service the current occupier Build Base Civils and Lintels, a builders merchant for trade and the general public.

5.88 There are few physical constraints that would impede development as the site is located in Flood Zone 1 and has no topographical or environmental constraints. However, the SHLAA suggests that the site is constrained by contamination issues which would need to be addressed during the construction process. The development of this site would also require the demolition and site clearance of the current building and associated infrastructure. The site does not currently benefit from planning permission.

5.89 Furthermore, the SHLAA states that the site is promoted by the landowner and tenancy/ownership is not deemed to be a concern; however, the development of this site for the delivery of residential dwellings would involve the forced relocation of the existing occupier. Build Base are a national retailer within excess of 175 branches nationwide and the loss of the site would contribute to the trend of a loss of commercial and retail space within the defined Town Centre in favour of residential development. This further emphasises aforementioned concerns regarding the overall vitality and viability of Warrington Town Centre and conveys a divergence from the ambitions outlined within Policy DEV5 (Retail and Leisure Needs). Though the site is considered suitable for residential development in isolation, the Warrington housing supply trajectory evidently demonstrates a sacrifice of occupied retail and commercial space in

favour of high-density residential apartments. The promotion of such schemes fails to address key issues including the provision of family and affordable housing.

Conclusion

- 5.90 Upon consideration of the absence of planning permission, current occupation of the site, known presence of ground contamination and the associated demolition required for any scheme, the delivery of the 132 dwellings within the 6-10 year period of the plan remains undeliverable. The Consortium does not dispute the overall capacity of the site as the proposed density equates to 131dph, but the delivery rate remains disputed. Overall, the Consortium consider that the delivery of 132 dwellings will be delivered during the 11-15 year period of the plan; and, that this trajectory will more accurately represent the dwellings associated with this proposed development site.

Table 5.14 Warrington Civils and Lintels Site Capacity Analysis

Warrington Local Plan (2021)- Site Capacity and Trajectory			
	Overall Capacity	132	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	132	0
Consortium's Capacity Analysis			
	Overall Capacity	132	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	132

Land at Winwick Street (Tanners Lane, Dallam Lane, Warrington, WA2 7NG) [Our Ref. LF32]

- 5.91 The Land at Winwick Street site accounts for 292 units within the housing land supply across the 6-10 year period of the plan. The site is located within the Stadium Quarter of the Warrington Town Centre Masterplan. The site is tightly bounded by neighbouring land uses which include commercial, office, retail and light industrial business to the north, east and west. The overall site area comprises 1.17 hectares, but this does not account for all of the land within urban block as the educational facility UTC Warrington, the Grade II listed Kings Head Public House and an additional car parking facility remain outside of the red line boundary. Land uses within the proposed red line boundary for development include light-industrial buildings and a car garage though the site is predominantly car parking.
- 5.92 The site has been subject to recent planning applications, but the site does not benefit from planning permission at this time. A *'request for a screening opinion for the demolition of existing structures and erection of mixed use development comprising six blocks (A, B, C, D, E & F) of between two to seventeen storeys, including circa 531 residential dwellings (use class 3), 138- bed hotel (use class c1), 1,058 sqm commercial/retail floorspace (use class A1, A2, A3, A4, A5 and D1), 1,265 sqm office accommodation (use class B1) with associated access, public real works, parking, servicing and landscaping'* (Ref. 2019/34942) was submitted in May 2019 and the Council deemed that the proposed scheme did not constitute EIA development on the 7th June 2019.
- 5.93 A following outline application for the *'proposed demolition of existing structures and the erection of a mixed-use development comprising four blocks of up to 12 storeys to accommodate up to 550 residential dwellings (Use Class C3), a 160-bed hotel (Use Class C1) and 3,000sqm commercial/office/retail floorspace (Use Class A1, A2, A3, A4, A5, B1, D1 and D2) with associated access, public realm works, parking and servicing (all matters reserved*

apart from access)’ (Ref. 2019/35548) was submitted to the Council on the 5th August 2019 and is yet to be determined. Although the Council has been involved in pre-application discussions with the developer – Novus, regarding the scheme, it remains clear that the current scale of the development is excessive.

5.94 The scheme was considered at Planning Committee in August 2020 but was deferred due to the conclusion that the provision of a 25-storey tower was of excessive scale. The scheme has since been revised to a maximum of 12 storeys though the proposed 550 dwellings are retained through a revised layout.

5.95 The Consortium considers the density of the proposed scheme to be undeliverable due to the array of land uses that are proposed for a 1.06ha site. The delivery of 550 dwellings across this site equates to 519dph which is akin to high-rise developments in Manchester city centre and this figure excludes the proposed 160-bed hotel, 3000sqm commercial floorspace and public realm improvements. To further emphasise the excessive scale, the SHLAA capacity estimates the provision of 292 dwellings. Therefore, this density is clearly unachievable and the absence of a decision from the Council confirms the challenges in achieving a deliverable scheme of appropriate scale.

Conclusion

5.96 The Consortium considers that the delivery of a mixed-use scheme on the Land at Winwick Street should be a significantly lower density to remain developable. As is outlined within Policy DEV1 of the Plan, the appropriate density for residential development in the Town Centre is at least 130dph. However, despite the site forming part of the defined Town Centre, the number of residential properties in the locality are scarce.

5.97 Furthermore, the existing houses located west of the site are low-density terraced and semi-detached properties. The Consortium considers that the application of a density of 130dph is acceptable for this parcel which equates to an overall capacity of 123 units on site. Furthermore, the delays in determining the outline application for the proposed scheme will likely postpone the delivery of the scheme and as a result, it is considered that the associated dwellings will deliver in the 11-15 year period of the plan.

Table 5.15 Land at Winwick Street Site Capacity Analysis

Warrington Local Plan (2021)- Site Capacity and Trajectory			
	Overall Capacity	292	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	292	0
Consortium’s Capacity Analysis			
	Overall Capacity	123	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	123

**Warrington Bus Depot (Wilderspool Causeway, Warrington, WA4 6PT)
[Our Ref. LF33]**

5.98 The Warrington Bus Depot site accounts for the delivery of 153 dwellings within the housing land supply over the 6-10 year period of plan. The site is located within the Southern Gateway Regeneration Area in the Warrington Town Centre Masterplan which is sought to provide an estimated 1,300 dwellings. The site is the current bus depot for Warrington’s Own Buses and is located east of Wilderspool Causeway. St James Business Centre adjoins the site to the south,

whilst the eastern border is bound by the Skelton Junction to Ditton Junction Line. The western boundary of the site is located under 100m from the River Mersey.

- 5.99 Warrington Borough Council and Warrington's Own Buses have been collaborating over the relocation of the bus depot to an alternative location in favour of the Southern Gateway development project. Permission was granted for the construction of a new depot at Dallam Lane on the 11th July 2019 (Ref. 2019/34826). The full relocation was approved by Warrington Council at the Cabinet Committee in February 2021. Warrington's Own Buses will move to the new site upon its completion and lease the facility for market rate from the Council.
- 5.100 Though the relocation of the Warrington Bus Depot is confirmed, the current depot site does not benefit from planning permission, nor has a planning application been submitted. Furthermore, the site is wholly located within Flood Zone 3. According to the Flood Risk Vulnerability and Flood Zone Compatibility Table outlined by the Department for Levelling Up, Housing and Communities, residential development is classified within the 'more vulnerable' category which in turn does not permit development in Zone 3b and requires an exemption test in Zone 3a. As a result, the Consortium cannot consider the site as developable in its current state as it is unsuitable for residential development.

Conclusion

- 5.101 Until an exemption test deems the site suitable for development, the Consortium operate under the assumption that residential development is not suitable for delivery on site. As a result, the 153 dwellings accounted for within the housing land supply trajectory should be removed until an exemption test confirms the suitability of the Warrington Bus Depot site.

Table 5.16 Warrington Bus Depot Site Capacity Analysis

Warrington Local Plan (2021)- Site Capacity and Trajectory			
	Overall Capacity	153	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	153	0
Consortium's Capacity Analysis			
	Overall Capacity	0	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	0

Sites Incurring a Loss of Employment Space

- 5.102 It is evident from the site analysis conducted by the Consortium that a significant proportion of the proposed sites included within the Warrington housing land supply incur a loss of employment space. Policy DEV5 (Retail and Leisure Spaces) places great weight on '*the need to safeguard and enhance the vitality and viability*' of local centres, including Warrington Town Centre but the approach being taken in the identification of potential housing sites conflicts with this policy. The following sites are located within the defined Town Centre and immediate Inner Warrington and the delivery of residential dwellings at these sites would see the removal of occupied employment land within the Local Authority Area.
- 5.103 Each site has been addressed based on individual merit though a recurring theme in the loss of commercial and retail space is apparent. This will have an impact on the vitality and sustainability of the town centre through the loss of services and facilities. Though the removal of individual sites may not result in significant adverse losses, the cumulative loss of retail and employment space on the following sites would amount to 10.92 hectares if completed in

accordance with the Council's trajectory. We assess the existing retail sites and commercial sites collectively below.

Loss of Retail Floorspace

Go Outdoors (Wilson Patten Street, Warrington, WA1 1PS) [Our Ref. LF29]

5.104 The Go Outdoors site accounts for 103 dwellings towards the housing land supply trajectory for Warrington across the 6-10 year period of the plan. The site lies south of Wilson Patten Street and is bounded by the Skelton Junction to Ditton Junction Line to south. A steep banked area of trees divides the proposed site from the Slutchers Lane to the west. The site is part of the Bank Quay Gateway of the Warrington Town Centre Masterplan and the 'Warrington Civils and Lintels' site, also included within the housing land supply, meets the site to the East.

5.105 The site remains an occupied unit for the national retailer Go Outdoors along with a large car parking area for customers. However, the site is being promoted by the landowner and developer interest has been expressed, according to the SHLAA. The proposed development is deemed to be of appropriate scale with a proposed density of 130dph, meeting the criteria within Policy DEV5 of the emerging Local Plan.

Conclusion

5.106 Overall, the Consortium considers the proposed capacity of the site and the rate of delivery as attainable, but the significance of the site emphasises wider issues associated with Warrington's housing land supply trajectory. The loss of retail space in stores actively occupied by national retailers appears to challenge the supposed primacy of ensuring the vitality of the Town Centre contained in Policy DEV5 in the UPSVLP. An isolated review of the site does not present any significant constraints that impede development but as expressed, the cumulative effect of a trend from commercial to residential development will likely have a negative effect on the success of Warrington's local economy.

Table 5.17 Go Outdoors Site Capacity Analysis

Warrington Local Plan (2021)- Site Capacity and Trajectory			
	Overall Capacity	103	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	103	0
Consortium's Capacity Analysis			
	Overall Capacity	103	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	103	0

Land enclosed by Hopwood Street, School Brow and Crossley Street (Warrington, WA2 2TA) [Our Ref. LF30]

5.107 The Land Enclosed at Hopwood Street, School Brow and Crossley Street accounts for 109 dwellings towards the housing land supply trajectory for Warrington across the 6-10 year period of the plan. The site is not within the defined Town Centre but remains adjacent to commercial and retail outlets that form part of the Cockhedge Shopping Park. The proposed site lies south of the Cockhedge Green Roundabout, west of the Salvation Army Building, and north-west of the Sainsbury's Superstore. Further light industrial businesses are located directly south. The site remains occupied by Farmfoods, a frozen food retailer.

5.108 The site does not benefit from planning permission for residential development. In addition, the SHLAA indicates that the site is not being promoted by the developer and no developer has an interest in the site. As a result, the site cannot be considered available or attractive to developers. In addition, neighbouring land uses are strictly of commercial, retail and light industrial land uses and therefore, residential development is not considered suitable or desirable within this specific site.

5.109 As Farmfoods is the current occupier of the retail unit and expanded into the neighbouring unit following the grant of permission in January 2020 (Ref. 2019/35553), it is considered that current retail park remains in significant demand. Furthermore, the accompanying documents submitted with the application expressed that Farmfoods have extended their lease for a further 15 years beyond the existing lease ending in 2024 as the site is in an ‘optimal location’ for their trade. It is clear that the current retail unit and occupier continue to successfully trade from this site and that proposed residential development would negatively impact local demand and the occupier.

5.110 This conversion of this site from a retail to residential land use conveys a recurring theme in the Warrington housing land supply as the removal of active retail floorspace is favoured for the purposes of artificially boosting the claimed supply in Warrington. Policy DEV5 (Retail and Leisure Needs) explicitly refers to the need to ‘safeguard and enhance the vitality and viability’ in and around Warrington Town Centre. This exacerbates further social issues with regards to access to housing as Town Centre sites and sites within Inner Warrington are favoured for high-density developments that predominantly deliver 1-2 bedroom apartments rather than family and affordable dwellings which are of far greater demand. By adopting this approach towards the delivery of residential dwellings, the Plan will effectively achieve the ambition outlined within the SHMA to achieve a rate of 65% of new homes comprising 3- and 4-bedroom dwellings.

Conclusion

5.111 The desire of the current occupier to extend their lease over an additional 15 years demonstrates the successes of this site as a retail park. The inclusion of this site in the Warrington housing land supply conveys that the Council is actively promoting the site despite a conflict of interest with an expanding retailer. Furthermore, the site is not being promoted by the landowner, nor has developer been approached/identified. Therefore, the Consortium considers that this site is not suitable for residential development and associated dwellings should be removed from the housing land supply trajectory.

Table 5.18 Land enclosed by Hopwood Street, School Brow and Crossley Street Site Capacity Analysis

Warrington Local Plan (2021)- Site Capacity and Trajectory			
	Overall Capacity	109	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	109	0
Consortium’s Capacity Analysis			
	Overall Capacity	0	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	0

Pinners Brow Retail Park (Pinners Brow, Warrington, WA2 7XA) [Our Ref. LF37]

- 5.112 The Pinners Brow Retail Park site accounts for the delivery of 193 dwellings towards the housing land supply trajectory in the 11-15 year period of the plan. The site remains actively occupied as a retail park in the proposed Stadium Quarter are contained within the Warrington Town Centre Masterplan. This site also lies within the defined Town Centre boundary. The site is bound by light industrial units to the South, whilst the Halliwell Jones Stadium lies north-west. Further commercial units lie directly north along with the Warrington Rodney Public House. The site is bounded by the A49 Lythgoes Lane to the east and additional comparatively smaller commercial outlets are located on the opposing side of the road. The site area extends to 1.98 hectares, 1.48 hectares of which is considered developable according to the SHLAA data.
- 5.113 In terms of physical, environmental and infrastructural constraints, the site features few issues that would impede development. However, the site does not benefit from planning permission for residential development and the SHLAA suggests that no developer interest is expressed. The key limitation in the delivery of this site for residential development centres on the absence of existing residential dwellings in the locality. The predominant land uses are commercial and light industrial, and the proposed site adjoins no other residential complexes. Furthermore, additional retail units such as a Tesco Extra Superstore are located further north. Therefore, residential development is not considered suitable in this location as surrounding land uses are broadly comprised of business and retail enterprises.
- 5.114 In addition, this site further emphasises the recurring theme of a loss of retail space in favour of residential development. Pinner Brow Retail Park is occupied by national retailers such as Wickes, Carpet Right and Sofology, as well as local leisure businesses such as ‘The Jungle’ Child Amusement Centre. As of November 2021, none of the retail units are vacant and this clearly demonstrates the demand of Pinner Brow Retail Park for both customers and retailers alike. As has been established prior, retail space is critical in ensuring the retained vitality of the Town Centre and the cumulative loss of retail space in sites throughout the Warrington housing land supply would actively challenge the primacy of Policy DEV5.

Conclusion

- 5.115 The proposed Pinners Brow Retail Park site is not considered suitable for residential development as the surrounding land uses are not perceived as complimentary and on the grounds that the current retail park continues to remain attractive to occupiers including national retailers. Therefore, the Consortium considers that the 193 dwellings contributing towards the Warrington land supply should be entirely removed from the trajectory.

Table 5.19 Pinners Brow Retail Park Site Capacity Analysis

Warrington Local Plan (2021)- Site Capacity and Trajectory			
	Overall Capacity	193	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	193
Consortium’s Capacity Analysis			
	Overall Capacity	0	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	0

Loss of Commercial Floorspace

Wharf Industrial Estate (Wharf Street, Warrington) [Our Ref. LF41]

5.116 The Wharf Industrial Estate site accounts for the delivery of 128 dwellings across the 11-15 year period of the plan. The site is bound by the River Mersey along its southern and eastern border and meets the Riverside Retail Park to the west. The proposed site meets existing residential development to the north. Wharf Industrial Estate remains occupied by an array of commercial, light industrial and leisure businesses, all largely defined as small businesses. The total site area comprises 4.86ha and 3.64ha is considered developable.

5.117 Due to the proximity of the site to the River Mersey, the majority of the site lies within Flood Zone 2. It should be noted that flood defences are located between the site area and the banks of the River Mersey though a large proportion of the site does not benefit from flood defences. The site holds few other constraints, but development would require the demolition and site clearance of existing on-site buildings. The site is currently being promoted by the landowner but there is no developer interest at this time according to the SHLAA. The site does not benefit from planning permission but the SHLAA also states that pre-application advice with the Council has been previously sought.

Conclusion

5.118 The Consortium does not wish to challenge the capacity analysis or the rate of delivery as the proposed 128 dwellings would equate to 35dph which meets the provisional density for Inner Warrington outlined within Policy DEV1 of Plan. In addition, the provision of 128 dwellings at a density of 35dph suggests that the delivery of larger sized dwellings such as family housing will be sought on site. The Consortium considers the delivery of family and affordable housing as favourable on this site and believe that sites that can provide such units and should be favoured over high-density apartment schemes. By adopting this approach towards the delivery of residential dwellings, the Plan will effectively achieve the ambition outlined within the SHMA to achieve a rate of 65% of new homes comprising 3 and 4 bedroom dwellings.

5.119 However, Wharf Industrial Estate remains an occupied trading estate for a variety of local business and accounts for approximately 5ha of employment land in Warrington. As has been expressed in detail in prior analyses, the cumulative loss of commercial and retail space in Warrington in favour of residential development has the potential to impact the vitality and prosperity of the Town Centre and local businesses.

Table 5.20 Wharf Industrial Estate Site Capacity Analysis

Warrington Local Plan (2021)- Site Capacity and Trajectory			
	Overall Capacity	128	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	128
Consortium's Capacity Analysis			
	Overall Capacity	128	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	128

Causeway Park (Central Avenue, off Wilderspool Causeway, Warrington, WA4 6QS) [Our Ref. LF39]

5.120 The Causeway Park site accounts for the delivery of 60 dwellings in the 6-10 year period of the plan. The Causeway Park site is located within the Southern Gateway area of the Warrington

Town Centre Masterplan which is intended to provide a ‘residential community comprising town houses and traditional terraced streets.’ The site is part of the wider Palatine Industrial Estate and is defined as Causeway Park. The site is bounded by the Skelton Junction to Ditton Junction Line to the north east, and the A49 Wilderspool Causeway to the south west. Priestly College and existing residential development lie south of the site area. The site comprises 2.27ha and 1.7ha of which is defined as developable.

- 5.121 The proposed site has a number of physical and environmental constraints. The site is wholly within Flood Zone 2 and the site is currently occupied as an employment site, servicing a range of small-scale businesses including light industrial units, leisure facilities and commercial units. Ownership issues are considered of material concern as there are multiple leaseholders across the site. Furthermore, the SHLAA states that the site is not being promoted by the current landowner.

Conclusion

- 5.122 The Consortium considers the site to be developable, but the combination of these issues suggest that the current delivery trajectory is undeliverable at its perceived rate. Therefore, in order to account for the associated ownership issues, the Consortium considers that the proposed delivery of 60 dwellings will be delivered in the final 11-15 year period of the plan.

Table 5.21 Causeway Park Site Capacity Analysis

Warrington Local Plan (2021)- Site Capacity and Trajectory			
	Overall Capacity	60	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	60	0
Consortium’s Capacity Analysis			
	Overall Capacity	60	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	0	0	60

Conclusions of Site Analysis

In conclusion, having reviewed the assumptions used by the Council for all sites with a capacity of more than 50 units (44 sites) in the context of the definition of deliverable and developable set out in the Framework, the Consortium has sought to alter the trajectory for 20 of the sites. In total, the overall reduction considered appropriate and necessary by the Consortium from the sites assessed is 1,610 dwellings as set out in Table 5.22 which leaves a developable supply from the site’s assessed of 1,752 dwellings. The Consortium is of the opinion that reductions are required and justified across the entire plan period as indicated in Table 5.22.

Table 5.22 Council v Consortium's Claimed Housing Land Supply Position

Warrington Local Plan (2021) - Site Capacity and Trajectory			
	Claimed Capacity Position	3,362	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	388	1,459	1,515
Consortium’s Capacity Analysis			
	Consortium Capacity Position	1,752	
	Years 1-5	Years 6-10	Years 11-15
Dwellings	165	326	1,261

Former Fiddlers Ferry Power Station

- 5.123 A detailed Technical Note relating to the Former Fiddlers Ferry Power Station site has also been prepared to accompany the Consortium's submission. The Consortium has considerable concerns in relation to the claimed delivery from the site. Without seeking to regurgitate the analysis set out in the accompanying Technical Note on the site, it concludes that the delivery assumptions are grossly overestimated for the Fiddlers Ferry site and there is no way the predicted delivery as set out in the Council's supply trajectory, can be achieved.
- 5.124 Although the Consortium has serious concerns in relation to the delivery of any dwellings from the site, they have applied reasonable and pragmatic delivery assumptions based on experience from elsewhere and conclude that at least 595 dwellings needs to be removed from the supply trajectory for this site and no units will be delivered until at least 2033/34.

6.0 Other Supply Considerations

- 6.1 Aside from site specific issues on the selected sites as set out in this Review, the Consortium also have concerns in relation to other elements of the supply. In particular, the members are concerned about the scale of windfall allowance in the Borough as there is no certainty in relation to its continued supply, location of the supply or the ability to secure affordable housing from the supply. There are also concerns in relation to the Council's ability to demonstrate a 5-year supply of housing land at the adoption of the Plan.

Windfalls

- 6.2 The Warrington Local Plan makes allowances for windfalls in the claimed supply. Windfall sites are defined in the Framework [Annex 2] as '*Sites not specifically identified in the development plan*'. At the outset, the Consortium would like to point out that it has no issue with the inclusion of an allowance for windfalls but only where there is '*compelling evidence*' as required by National Policy contained in the Framework [§71].
- 6.3 It is important to emphasise that windfall sites do not represent a guaranteed supply of housing sites. Warrington Council has been relying on a finite supply of sites for a number of years in the absence of an up to date Local Plan, a lack of allocated land for housing and tightly defined Green Belt boundaries around settlements. The Council has little influence over the location of windfall sites and the size and type of property. As such, overly relying on windfall sites will result in the Council having limited influence on the location or type of dwellings coming forward and how that aligns with the objectives set out in the Local Plan, particularly the delivery of 20% affordable dwellings in Inner Warrington and 30% elsewhere in the Borough (as set out in Policy DEV 2 – Meeting Housing Needs).

Warrington Council's Local Plan Position on Windfalls

Over-reliance on Windfalls

- 6.4 The Council sets out its housing supply and trajectory for the plan period in the Local Plan (Appendix 1 – Housing Trajectory). The supply includes an allowance for windfall sites or a 'small sites' allowance (sites under 0.25ha) of 81dpa for the full plan period, which equates to an overall supply of 1,458 dwellings.
- 6.5 The evidence being relied upon by the Council to justify the proposed small sites allowance is set out in the Council's SHLAA, which states that the delivery of small sites within the housing land supply is based on historic completion information. Historic completion rates for sites below the threshold of 0.25ha are set out in Table 2.4 of the SHLAA (Figure 6.1).

Figure 6.1 Summary of annual average small sites completions

Year	Total number of gross completions	Completions on Small Sites (below 0.25ha)	Completions on Small sites as a % of total completions	Completions on Large Windfall Sites (0.25Ha and above)
2007/2008	1565	207	13.2%	1
2008/2009	633	89	14.1%	0
2009/2010	388	57	14.7%	0
2010/2011	527	42	8.0%	0
2011/2012	600	57	9.5%	3
2012/2013	647	57	8.8%	0
2013/2014	693	117	16.9%	2
2014/2015	687	62	9.0%	0
2015/2016	595	60	10.1%	0
2016/2017	521	117	22.5%	0
2017/2018	385	103	26.8%	7
2018/2019	503	86	17.1%	0
2019/2020	559	112	20.0%	3
10 Yr Total	5717	813	14.2%	15
Small sites average completions (last 10 yrs)		81		

Source: Warrington SHLAA (2020)

- 6.6 The SHLAA states that the data set out in Table 2.4 (Figure 6.1) shows that Warrington has a strong record of delivering a substantial number of dwellings on small sites. The SHLAA also notes that it is considered reasonable to assume that small sites will continue to be delivered in the Borough throughout the plan period and that an average figure for the ten-year period should be employed. This approach is consistent with the Framework [§71] which states that any allowance should have regard to historic windfall delivery rates.
- 6.7 That said, the evidence presented by the Council to justify the proposed level of windfall allowance must be considered further and it should be assessed whether the proposed approach is relevant and appropriate in the context of preparing a new Local Plan.
- 6.8 As illustrated in Figure 6.1, a significant percentage of the overall supply within the Borough from 2010-2020 came forward on small sites (windfalls). This is particularly evident for completions on small sites for the period 2016-2020, which represented 21.2% of the total completions for this period. This 4-year period of high levels of small sites delivery has clearly had a significant effect on the overall historic windfall delivery rates for the period 2010-2020 (which is the basis for the Council's small sites allowance of 81dpa).
- 6.9 The Consortium considers that this high level of windfall delivery has likely been dictated by the lack of an up-to-date Local Plan and the resultant absence of housing allocations, which has necessitated higher delivery on small sites in order to boost supply (particularly for the period 2016-2020). The Consortium considers that the approach being pursued by the Council is not appropriate, as historic windfall delivery rates have been pushed higher than would normally be expected or considered appropriate due to a lack of housing allocations.
- 6.10 The Consortium recognises that at face value, the Council's assertion that Warrington has a 'strong track record of delivering a substantial number of dwellings on small sites'² is accurate. However, the Council has sought to justify employing an average figure for future delivery on

² SHLAA 2020 (para. 2.64)

the past ten-year period, without acknowledging the likely reasons for its record of delivery on small sites. This approach is not considered appropriate in the context of the emerging Local Plan, which provides an opportunity to allocate suitable and sustainable sites across the Borough, and subsequently reduce the Council's historic reliance on windfall sites for the upcoming plan period.

Concerns with Delivery of Windfall Sites

- 6.11 In addition to the Consortium's concerns with the over-reliance on windfall sites, there are concerns over the delivery of windfall sites in the trajectory. The supply trajectory includes a small sites allowance in years 1-3 of the plan period (2021-2024) of 81dpa. However, it is considered that the Council should not be including windfalls within the first three years of the plan period.
- 6.12 Windfall sites have not yet obtained planning permission and will take time to come forward both through the planning process and to progress to completion. Lichfield research³ indicates that for sites of 0 to 99 dwellings it takes almost three years to progress to the delivery of the first dwelling, and larger sites even longer to come forward. The first year of delivery will have a lower build rate due to initial site preparation work which needs to take place before the first units can be completed. It is therefore reasonable to allow for at least three years before including a windfall allowance.
- 6.13 The appropriate approach is therefore to include a windfall allowance beginning three years from the date of the Council's evidence on existing commitments (April 2021) i.e. from 2024/25 onwards. This would be a reduction in windfall sites for three years (81 x 3) of 243, which is considered a conservative figure.

Consortium's Position on the Local Plan Windfall Allowance

- 6.14 The Framework [§15] sets out that '*the planning system should be genuinely plan-led*' and this should be the starting point for identifying sufficient allocations to meet the Council's needs. The Consortium considers that a small allowance may be included within the Council's supply for windfall sites but does not consider that the Council's approach proposing a small sites allowance of 81dpa is justified or appropriate.
- 6.15 The planned reliance on small sites does not represent positive preparation of the Local Plan, and instead proposes a continuation of past trends which have been dictated by a lack of housing allocations in an up-to-date Local Plan. The evidence demonstrates that there is a considerable affordable housing need in the area and a requirement for a significant proportion of larger 3 and 4 bed properties to be delivered, however the proposed reliance on windfall sites is unlikely to result in this need being met.
- 6.16 Reducing the planned delivery on windfalls and allocating an increased quantum of land for housing would ensure the most suitable and sustainable sites can come forward for development, and will provide greater control for the Council in determining where new housing is located. It would also therefore be beneficial in terms of ensuring the right size and type of housing, and the requisite quantum of affordable housing, can be delivered over the plan period. In light of this analysis, the Consortium proposes a reduction in the small sites allowance over the plan period by allocating more land for housing.
- 6.17 The Consortium also considers that the Council should not be including a small sites allowance in years 1-3 of the plan period (2021-2024) as set out previously, as this is not an appropriate approach to the delivery of small sites. The Consortium considers a reduction in the delivery of

³ Lichfields 'Start to Finish' Research document (November 2016)

small sites should be applied in the first 3 years of the plan period (comprising 243 dwellings) and additional, deliverable housing land allocations should be identified as an alternative.

5 Year Supply

- 6.18 The Framework sets a requirement for local authorities to be able to demonstrate a sufficient deliverable supply of housing land for a minimum of the first 5 years of the WLP period [§73]. The Consortium has not undertaken a full assessment of the Council's claimed supply and as such has not calculated its actual 5-year housing land supply position [5YHLS]. However, the Consortium has carried out a basic assessment of the 5YHLS based on analysis carried out on a proportion of the Council's supply and has considerable concerns in relation to the Council's ability to meet the requirements of §73 of the Framework. It is also worth noting the recent appeal⁴ at New House Farm, Hatton Lane where the Inspector concluded that the Council had an abject housing land supply of 3.4 years. This housing land supply position has also been validated by the Secretary of State in the Peel Hall, Warrington decision (November 2021)⁵.

Annual Housing Requirement for First 5 Years

- 6.19 As set out in the accompanying Technical Paper on Housing Requirement, the Consortium is fervently of the opinion that there is no rational justification for seeking to suppress the housing requirement in the first 5 years particularly bearing in mind the recent issues with meeting Warrington's minimum local housing need. Without regurgitating the content of the Housing Requirement Technical Note, the Consortium is of the opinion that the proposed stepped housing requirement is fundamentally flawed and unsound.
- 6.20 It is quite clear that Warrington's approach of backloading the housing land supply towards the end of the Plan period and reducing the requirement in the first 5 years is aimed squarely at ensuring it can demonstrate a 5YHLS upon adoption to help defend appeal situations. The Consortium considers that the Council should, at a minimum, apply an even approach across the plan period of 816 dpa, including in the first 5 years. The Consortium would even advocate identifying additional land and increasing the housing requirement in the early years of the Plan (see Housing Need Technical Note) but has not applied an approach of this nature to the 5YHLS analysis.
- 6.21 For the purposes of this analysis in relation to 5YHLS, the Consortium has utilised Warrington Borough's LHN.

Five Year Supply Summary

- 6.22 Based on the supply analysis carried out in the preceding sections, the Consortium considers that an element of the claimed supply is flawed and should not be included within the first 5 years of the plan period. It is also worth noting that the Supply Analysis has not considered sites with a capacity of less than 50 dwellings and it is highly likely based on the exaggerated conclusions of the larger sites that a proportion of the supply from those sites should be removed too.
- 6.23 The Consortium considers that the claimed supply in years 1-5 for SHLAA sites 1752 (Former Wilderspool Stadium, Warrington) and 1646 (Grappenhall Heys (Remainder)) should be reduced to 223 dwellings from 388 dwellings, as sufficient evidence has not been provided to

⁴ Appeal Ref: APP/M0655/W/21/3271800, New House Farm, Hatton Lane, Hatton, Warrington, Inspector's Decision (dated 22nd September 2021) paragraph 54

⁵ Appeal Ref: APP/M0655/W/17/3178530RD, Land at Peel Hall, Warrington, Secretary of State's Decisions (dated 9th November 2021), paragraph 24 & IR450

demonstrate deliverability. The supply of 35 units from the Fiddlers Ferry Power Station site should also be removed as well as the windfall allowance in the first 3 years of the Plan period.

- 6.24 The Consortium's analysis of the Council's 5YHLS is set out in Table 6.1. This includes the implementation of a 20% housing requirement buffer as the Council has consistently underdelivered against its requirement and failed the most recent Housing Delivery Test.

Table 6.1 5-Year Housing Land Supply Position

	Council's 5 Year Supply Position	Consortium's 5 Year Supply Position
Housing Requirement		
Warrington Local Plan Submission Version (LHN)	14,688 (816dpa)	14,688 (816dpa)
5 Year Requirement	3,390 (678 (Stepped Trajectory) * 5)	4,080 (816 (LHN) * 5)
20% Buffer	678	816
Outstanding 5-Year Requirement	4,068	4,896
Residual Annual 5-Year Requirement	814	979
Housing Supply		
Council's Claimed Five Year Supply	4,071 (814dpa)	4,071 (814dpa)
SHLAA sites reduction	0	258
Windfall Allowance Reduction	0	243
Overall Supply (2021-2026)	4,071 (814dpa)	3,570 (721 dpa)
Difference (Outstanding 5-Year Requirement against Overall Supply)	+3	-1,326
5 Year Housing Supply (expressed as years of residual annual requirement)	5.0	3.64

- 6.25 Based on Table 6.1, the Consortium considers that there is a shortfall of at least 1,326 dwellings in the first 5 years of the plan period and in fact it is likely much worse and closer to the conclusions reached at the recent appeal at New House Farm, Hatton Lane. As such, it is clear that the Council cannot demonstrate a 5-year supply of housing (3.64 years), in fact it falls significantly short of where it should be. This is even without assessing the full extent of the Council's claimed supply (i.e. every site included in the supply for the first 5 years of the plan period). Based on the Consortium's analysis of a proportion of the claimed supply, it is assumed that a further percentage of the supply would not be deemed as deliverable and would further impact on the Council's 5YHLS position.
- 6.26 The Consortium realise that brownfield sites play a very important role in the delivery of sustainable development and addressing the housing crisis, but the lack of supply needs to be urgently addressed by the inclusion of additional greenfield and Green Belt sites. Without the introduction of additional allocations, the Council will not be able to demonstrate a 5-year supply and the Plan will fail immediately post adoption.
- 6.27 The Consortium therefore strongly advocates the identification, through an appropriate evidence base, of a number of smaller and sustainably located Green Belt releases for residential development (i.e. sites with capacity to deliver 200-500 units). These sites would be able to come forward immediately upon adoption of the Warrington Local Plan and negate the need to backload the housing requirement. It would also seek to tackle the ever-worsening housing

crisis in the Borough and would ensure that the Council can demonstrate an adequate 5YHLS position.

7.0 Conclusions

- 7.1 The Consortium has sought to undertake a detailed and thorough assessment of a significant proportion of the Council's housing land supply focusing primarily on the larger sites with capacity to deliver 50 or more units. In total, there were 44 sites with capacity to deliver 50 or more units which we assessed in this housing land supply analysis paper and the combined capacity of the 44 sites was 7, 152 (43% of the overall supply).
- 7.2 Having reviewed the Plan and the evidence base in considerable detail, the Consortium is very surprised and disappointed with the lack of detail and information being provided to justify the significant levels of development being envisaged on some sites particularly those sites without planning permission. The Council has delayed the publication of this version of the Plan for almost 2 years and has had ample time to update and provide sufficient evidence to substantiate its claimed housing land supply.
- 7.3 In particular, the Consortium is incredibly disappointed with the lack of an up to date SHLAA being released and the figures contained in the plan differing significantly from those presented in the Plan. Furthermore, the Council has indicated that it will be releasing a new SHLAA immediately post conclusion of this consultation exercise. This is a fundamentally flawed approach which the Council has taken and represents poor practice in preparing a new Local Plan. It undermines the credibility of the process and the transparency of the Council's evidence base.
- 7.4 Where sites have no extant permission or live planning application, little if any information is provided on the willingness of the landowner to bring forward their land, the suitability of the site to accommodate development, justification for the claimed site capacity and the likely viability of the site bearing in mind future policy aspirations and infrastructure requirements.
- 7.5 Whilst the Consortium commend the Council's ambition to redevelop the Town Centre of Warrington, the delivery trajectory must be grounded in reality particularly relating to the viability of delivering high density development in a town centre. The delivery of high-density apartment schemes in Manchester and Liverpool is not comparable to Warrington for a host of reasons. Not only that but the delivery of high-density developments will not delivery sufficient proportions of affordable housing as is currently being experienced in Warrington's recently approved schemes or deliver sufficient levels of larger 3 & 4 bed family homes to meet housing needs identified in the Council's evidence.
- 7.6 As detailed in the accompanying Technical Note on the Fiddlers Ferry site, the Consortium strongly disputes the appropriateness of its introduction as a draft allocation particularly the proposed Green Belt release required to facilitate its delivery. The land proposed for release from the Green Belt is inappropriate and it plays a vital role in ensuring a meaningful separation between Warrington and Widnes.
- 7.7 Not only that but for the reasons set out in the Technical Note on the site, the anticipated delivery timescales are fanciful and not grounded in any sense of reality. Setting aside the substantive issues and complexities associated with the delivery of dwellings on this site, no completion will be achieved on it until at least 2033/34. This results in a reduction in the Council's claimed supply of 595 dwellings and alternative sources of supply need to be secured to plug the gap.
- 7.8 The Consortium has a significant number of issues with a number of the sites which were assessed. In particular, the acute lack of information to justify and substantiate the Council's rationale for justifying the sites inclusion is problematic. Having reviewed the sites in detail, the

Consortium is of the opinion that at least 2,448 dwellings needs to be removed from the supply trajectory, made up of the following reductions:

- At least 595 dwellings from Fiddlers Ferry;
- At least 243 dwellings from windfalls;
- At least 1,610 dwellings from sites with a minimum capacity of 50 dwellings.

7.9 This represents a reduction of 16.5% of the supply from the assessed sites and is a significant proportion. This reduction is purely from the sites with capacity to deliver more than 50 dwellings and it is highly likely that based on the experience with the larger sites, a proportion needs to be applied to sites below 50 dwellings too. A detailed re-evaluation of each Council's supply trajectory is required alongside the release of additional justification for each site ahead of any Examination in Public taking place. This is likely to result in the removal of a significant proportion of the claimed housing land supply.

7.10 As such, the Consortium is of the opinion that capacity for at least 2,448 dwellings need to be identified to meet the minimum housing requirement derived using the LHN (Table 7.1). The actual number of dwellings which the Consortium consider to be undevelopable is likely to be significantly higher as we have only undertaken analysis on a proportion of the supply. Furthermore, the Consortium is of the opinion as detailed in Technical Note A that the housing requirement being pursued needs to be increased to at least 1,015 dwelling per year and this would derive a need to identify sufficient land to meet the needs for an additional 6,388 dwellings. This demonstrates the magnitude of the issues associated with the claimed supply contained within the Warrington Local Plan.

Table 7.1 Housing Requirement v Housing Land Supply

	Council's Land Supply Position	Consortium's Land Supply Position (LHN)	Consortium's Land Supply Position (Revised Housing Requirement Figure)
Annual Target	816	816	1,015
2021 to 2038 (18-year plan period)	14,688	14,688	18,270
Flexibility (+10%)	1,469	1,469	1,827
Total Housing Requirement	16,157	16,157	20,097
Council's Overall Developable Supply (Urban Capacity excluding Green Belt Supply)	11,785	11,785	11,785
Supply Reduction (based on Consortium's analysis) (Developable Supply Reduction; Windfall Allowance Reduction; Fiddler's Ferry Supply Reduction)	/	2,448	2,448
Overall Developable Supply (Urban Capacity)	11,785	9,337	9,337
Shortfall in Developable Supply (Urban Capacity against Total Housing Requirement)	/	6,820	10,760
Existing Green Belt Supply	4,372	4,372	4,372
Additional Land Supply Required	/	2,448	6,388

7.11 Coupled with that, the Consortium also has considerable misgivings about the claimed 5-year supply of housing land. As a best-case scenario, the Council are claiming to have exactly a 5-year supply of housing land. However, this is a flawed assessment as it relied on an unjustified and illogical stepped housing required. In the Consortium's opinion, as a best case scenario, the Council can only demonstrate a 3.64 year supply but this is likely to be even less if all sites with capacity to deliver less than 50 units were assessed (Table 6.1). It is likely that the situation is much worse and at least as bad as that concluded by the Inspector at the recent New House Farm Appeal and the Secretary of State at Peel Hall, Warrington (3.4 years). As such, the five-year housing land supply position is likely to be much worse than is being envisaged by the Councils.

7.12 The Consortium has further concerns in relation to viability and the ability for the plan to deliver the number of dwellings including affordable dwellings envisaged and the infrastructure required to serve the new properties. A separate Technical Note on viability has been prepared by Roger Hannah which raised significant concerns about the ability of the identified sites to deliver the envisaged supply particularly in lower value areas. The Consortium has significant concerns that a sizeable proportion of the claimed supply does not stack up from a viability perspective and the plan will fail to deliver its vision and objectives.

- 7.13 The shortfall in supply can only be made up through the selective identification of sustainable Green Belt releases across the borough. As well as that, given the significant issues with the claimed supply, the Consortium are fervently of the opinion that the Plan needs to identify Safeguarded Land to meet needs beyond the Plan period and also include a trigger within the Plan that allows the Safeguarded sites to come forward should the claimed supply fail. Identifying large sites that deliver beyond the plan period is not the same as identifying Safeguarded Land as there is no way of boosting the supply on the larger sites to plug gaps created through under delivery elsewhere in the supply.
- 7.14 The Consortium is also of the opinion that the claimed housing land supply in Warrington has been derived, not based on evidence of what is needed, but purely on maximising and exaggerating the claimed capacity of every available site in the urban area regardless of its deliverability or viability. The prerogative of the plan appears to be reducing the proportion of Green Belt release required regardless of the evidence for what is needed.
- 7.15 Coupled with that, no account has been given of the market's ability to absorb the proposed level of apartment type developments or of what the future need is likely to be. The Plan needs to identify additional sites, most likely from the Green Belt, to meet the future housing needs particularly for larger 3 & 4 bedroomed properties. The Plan also needs to identify suitable and sustainable Safeguarded sites to meet needs beyond the plan period or in the event that the Council's claimed supply fails to materialise as envisaged.
- 7.16 The Consortium would like to note that this analysis represents a snapshot in time, and they may wish to update, expand or supplement this analysis at or before the Examination in Public. Furthermore, the Consortium may choose to extend the analysis to include sites below the threshold set in this assessment and undertake a thorough review of the new evidence which the Council will be releasing after this consultation exercise.
- 7.17 **In conclusion, the Consortium is of the opinion that the Council needs to identify sufficient land to deliver at least 2,448 additional dwellings, or 6,309 additional dwellings if seeking to align the economic aspirations with housing development particularly for larger family homes to ensure the supply aligns with the identified needs.**

8.0 Tests of Soundness

- 8.1 Taking the above analysis into consideration, the Consortium is of the opinion that the housing land supply set out in the evidence underpinning the UPSVLP is unsound for the following reasons:
- 1 It is not positively prepared:** Given the significant number of issues identified with the Council's claimed supply and the shortfall between the supply and the requirement, it is considered that the supply underpinning the Plan is insufficient and if adopted it will continue past trends of under delivery in Warrington. The SHLAA seeks to exaggerate the supply from sites particularly in the town centre with no regard being paid to the viability of the development, the loss of existing employment and retail facilities and the environment that is being created. Not only that, the SHLAA and the plan are fixated on hitting a target number of dwellings rather than delivering the right type of dwellings, (including affordable dwellings) in the right locations to meet needs. In a number of instances, the Council's evidence completely underestimates the timescales associated with the delivery of dwellings particularly on largescale complex sites and the projected delivery timescales are at odds with reality.

Finally, Warrington Council has failed the Housing Delivery Test and has a very poor 5-year housing land supply position. Nevertheless, the Plan does not seek to make positive steps to tackling these issues by identifying and allocating sites which can deliver homes in the first five years. Instead the Plan seeks to manipulate the housing requirement by unjustifiably backloading the supply whilst simultaneously exaggerating the claimed supply from other sites.
 - 2 It is not justified:** The Consortium is fervently of the opinion that the Council's delivery assumptions are fundamentally wrong and are completely unrealistic and unachievable. The claimed supply is completely exaggerated and does not take account of the complexity of delivering residential sites. Not only that, the Council released its plan without releasing the up to date SHLAA (the key housing supply evidence document) which underpins it. Instead, the Council is proposing to release the updated SHLAA once the consultation on the Local Plan concludes. This is a wholly unsatisfactory and an underhanded tactic to ensure that the SHLAA is not subject to sufficient scrutiny. As such, the Plan is unjustified as the full suite of evidence was not released.
 - 3 It is not effective:** The Consortium has a wealth of experience of delivering development in Warrington and having reviewed the Plan and the associated housing land supply is adamant that the plan is not effective and will not deliver the required number of dwellings over the plan period. This will result in continued shortfalls in the delivery of homes and worsening of the housing crisis in Warrington.
 - 4 It is not consistent with national policy:** The Framework is very clear in its objective of seeking to boost the supply of housing in an attempt to address the housing crisis. Within this in mind, the Consortium is of the opinion that the current version of the UPSVLP is inconsistent with national policy as it will not deliver sufficient housing to meet the housing requirement figure set out in the Plan. The housing trajectory set out in the evidence underpinning the Plan is dated and pays no regard to site specific considerations including reasonable delivery trajectories and delivery rates. Not only that, it seeks to impose undeliverable density rates on developments in Warrington Town Centre and takes no account of the type of housing which is needed over the plan period including affordable housing. Furthermore, no regard has been paid to the viability of delivering high density development in Warrington Town Centre and elsewhere and the impact this will have on the delivery of much needed affordable housing and social infrastructure such as schools

and medical centres to cater for future resident's needs. The Consortium is strongly of the opinion that the failure to identify a sufficient level of housing allocations in the Plan will result in the UPSVLP being found unsound at Examination or at the very least it will be subject to substantive changes at the Examination stage which will delay the formal adoption of the Plan.

For the reasons set out above, the Consortium is of the view that the housing land supply which underpins the Plan conflicts with national policy in the Framework, including in respect of:

- 1 Paragraph 60 in relation to significantly boosting the supply of housing
- 2 Paragraph 68-73 in relation to identifying sufficient quantum of land for homes
- 3 Paragraph 74-75 in relation to maintaining a deliverable 5-year supply
- 4 Paragraph 92-93 in relation to delivering healthy, inclusive and safe places as well as providing sufficient services and facilities for future residents
- 5 Paragraph 124 in relation to appropriate development densities taking account of the identified needs for different types of housing as well as local market conditions and viability

Recommended Changes

8.2 To address the conflict above and ensure the Local Plan is sound, it is considered that the Council:

- 1 Needs to provide additional evidence to justify the inclusion of a significant proportion of their claimed supply.
- 2 Introduce additional sites to bolster the deficient housing land supply over the plan period.
- 3 Identify suitable smaller sites (100-250 units) which can deliver homes in the first 5 years to ensure the Council can address its current shortfall.
- 4 Provide sufficient evidence to counter all the issues raised within the submission in relation to the Fiddlers Ferry or remove it entirely from the claimed supply.
- 5 Identify suitable and sustainable sites to be safeguarded for future development beyond the current plan period and include a 'policy hook' within the plan which allows the safeguarded sites to come forward in the event of a failure in supply of housing land.

Appendix 1 Email from Kevin Usher (Planning Policy Officer) on 11th October 2021

From: [Usher, Kevin](#)
To: [REDACTED]
Subject: RE: Land Supply SHLAA (2020) and Updated PSVLP (2021) Urban Capacity [NLP-DMS.FID758167]
Date: 12 October 2021 10:21:23
Attachments: [REDACTED]

CAUTION: This email originated from an external source.

Hi Henry,

The 11,785 comes from the data in the 2020 SHLAA data, which does include site capacities beyond 15 years, it's just not reported in the SHLAA. The Masterplanning work was integrated into the SHLAA in 2020, hence there is no longer any separate data set. Everything is in the SHLAA.

The methodology for assessing the site capacities is essentially as explained in the SHLAA, although with the larger sites (both within the urban area and the Green Belt that are proposed to be allocated (ie Peel Hall/Waterfront/SEWUE/FFPS) account has been taken of information provided by the site promoters and comparison with other large development sites (including recent reports produced by Lichfields).

Regards

Kevin Usher
Principal Planning Policy Officer

[REDACTED]

From: Henry Mackenzie [REDACTED]
Sent: 11 October 2021 17:13
To: Usher, Kevin [REDACTED]
Subject: RE: Land Supply SHLAA (2020) and Updated PSVLP (2021) Urban Capacity [NLP-DMS.FID758167]

Many thanks for outlining this information Kevin- it is much appreciated.

Is there a specific methodology that has been applied for the trajectory to arrive at the 11,785 figure, or is it just the cumulative total of SHLAA and the Town Centre Masterplanning figure?

Kind regards,
Henry

Henry Mackenzie

[REDACTED]

[REDACTED]

[REDACTED]

From: Usher, Kevin [REDACTED]
Sent: 11 October 2021 16:53
To: Henry Mackenzie [REDACTED]
Subject: Land Supply SHLAA (2020) and Updated PSVLP (2021) Urban Capacity

CAUTION: This email originated from an external source.

Hi Henry,

Further to our conversation earlier this afternoon regarding the above matter.

The [SHLAA \(2020\)](#) records the housing land supply as 10,430 dwelling units (Table 3.7, page 27). This figure is based on the borough wide deliverable and developable supply over the 15 year period from 2020/21 to 2034/35.

The [Updated Proposed Submission Version Local Plan \(2021\)](#) specifies an urban capacity of 11,800 dwelling units.

As I indicated, previously there were two sources of data that comprised the urban capacity. One was the SHLAA data and the other was the Town Centre Masterplanning work. However, it was recognised that this was not a very clear or efficient way of capturing or presenting the data.

Hence, since the 2020 SHLAA was produced our town centre masterplanning work has been integrated into the SHLAA data set and also this work has been reviewed to take account of comments made in response to the consultation of the PSVLP (2019). This may account for some of the difference. Also the SHLAA data will include an element of Green Belt capacity, albeit that this will be fairly small (predominantly PDL sites that have/are expected to come forward).

However, the main reason why there is a difference between the SHLAA 2021 figure (10,430) and the urban capacity figure quoted in the Updated PSVLP (2021) (11,800) is because this figure is for the full Plan Period of 18 years (not the 15 years that the SHLAA works to). In addition, it should be noted that the Housing Trajectory (Appendix 1) in the Updated PSVLP (2021), which the urban capacity figure is derived from, uses the 2021 SHLAA data (not yet published), as opposed to the 2020 SHLAA information.

I hope this is clear but if you need any further clarification please don't hesitate to call me.

Regards

Kevin Usher
Principal Planning Policy Officer

[Redacted contact information]

[Redacted contact information]

[Redacted contact information]

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Appendix 3 Note C - Fiddler's Ferry Technical Note

Technical Note – Fiddlers Ferry

Our ref 42154/04/CM/NMi
Date November 2021

Subject Draft Policy MD3 - Fiddlers Ferry

1.0 Introduction

- 1.1 This Technical Note has been prepared by Lichfields on behalf of a Consortium of leading housebuilders operating in the Warrington and North West housing market. The Note has been prepared in response to the consultation on the Warrington Updated Proposed Submission Version Local Plan 2021 [WUPSVLP 2021] and should be read in conjunction with the overarching Issues Report which was submitted by the Consortium in response to the Consultation on WUPSVLP 2021.
- 1.2 It forms part of the evidence underpinning the Consortium’s detailed technical representations to the WUPSVLP 2021. It focuses solely on matters relating to Draft Policy MD3 – Fiddlers Ferry and the evidence base that supports that policy.
- 1.3 The Consortium has considerable concerns in relation to the soundness of the draft allocation at Fiddlers Ferry and in particular the deliverability and developability of the site. With this in mind, the Consortium wishes to highlight its concerns by undertaking a detailed assessment of the allocation and this assessment is provided below.
- 1.4 The aim of the Consortium in preparing this analysis is to demonstrate the soundness issues associated with the Plan which can be addressed through the identification of additional allocations, as the Council has overestimated the deliverable and developable capacity of the Fiddlers Ferry site.
- 1.5 Our assessment of the site is set out in the following sections:
- Section 2: Context to the Site
 - Section 3: Background to the Fiddlers Ferry Allocation
 - Section 4: Duty to Co-operate
 - Section 5: Sustainability Appraisal
 - Section 6: Development Options and Site Assessment Technical Report
 - Section 7: Local Plan Transport Modelling
 - Section 8: Draft Policy MD3 – Fiddlers Ferry
 - Section 9: Site Constraints
 - Section 10: Green Belt
 - Section 11: Density
 - Section 12: Viability
 - Section 13: Delivery Timeline
 - Section 14: Conclusions

- Section 15: Tests of Soundness

1.6 The Consortium reserves the right to undertake future detailed analysis of the Fiddlers Ferry site as part of its representations and Matter Papers for the Examination in Public.

2.0 Context to the Site

- 2.1 The former power station at Fiddlers Ferry has been operational as a coal fired power station since 1971 and very recently was closed in March 2021. The site is located to the south of A562 Widnes Road. Together with associated land, the site comprises a total of 324 hectares, extending south beyond the St Helen's Canal and the Widnes to Warrington Railway Line, to the River Mersey.
- 2.2 The western boundary of the site also delineates the administrative boundary between Halton Borough and Warrington Borough. A small triangular piece of land to the south of the railway and on the foreshore of the Mersey forming the western-most part of the site, lies within Halton, whilst the majority lies within Warrington Borough.
- 2.3 The site, to the north of the railway line is currently dominated by the former power station infrastructure, with its 8 cooling towers, turbine hall, substation and numerous building and equipment in the form of conveyors, pipework and operational and administrative buildings. The site also encompasses welfare uses for former employees, including a sports pitch and angling lake to the north.
- 2.4 On the western side of the site is a large coal storage area, or coal pad with a rail loop connecting to the main line. The coal previously located on the coal pad has now been removed leaving a large area of hard standing.
- 2.5 The main area of the site to the south of the railway line is artificially elevated above the River Mersey following the creation of large lagoons related to the water-cooling infrastructure and ash depositions. To the west and south are relatively steep vegetated embankments leading down to the Mersey foreshore. Surrounding the lagoons on the embankments and unused areas, scrub planting has grown up over the years 'greening' the environment, whilst some reed beds and planting has grown on the foreshore of the lagoons.

3.0 Background to the Fiddlers Ferry Allocation

The adopted Warrington Core Strategy

- 3.1 The adopted Warrington Core Strategy (2014) identifies the previously developed part of the site to the north of the railway line under Policy PV2. This policy supports development which enhances the existing employment opportunities at the facility. The remainder of the site is identified as lying within Green Belt (Policy CS5). The whole of the site is identified as part of a Strategic Green Link (Policy CS6) where a key focus is on reinforcing and maximising the environmental and socio-economic benefits of the links and supporting initiatives which seek to connect the borough's Strategic Green Links with employment areas, residential communities, and Green Infrastructure Assets. The southern part of the site beyond the railway line is covered by Biodiversity and Geodiversity Policy QE5 which states that proposals for development in or likely to affect Sites of Special Scientific Interest (SSSI) will be subject to special scrutiny. Development that may have an adverse effect, directly or indirectly, on the SSSI will not be permitted unless the reasons for the development clearly outweigh the nature conservation value of the site itself and the national policy to safeguard the national network of

such sites. The adopted policy for the site therefore supports employment rather than residential development on the brownfield portion of the site only and the remainder of the site is subject to normal Green Belt policy restrictions upon development.

The Warrington Submission Plan 2019

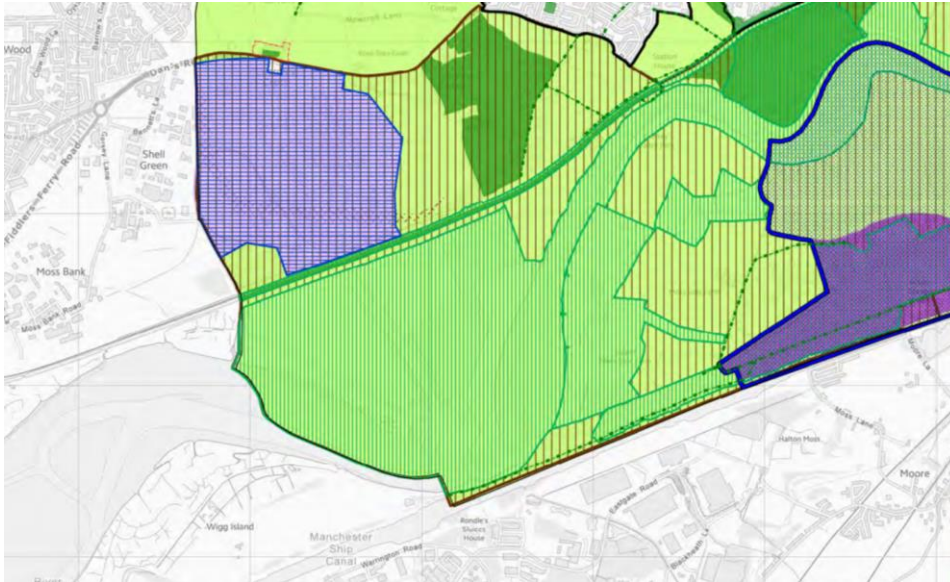
- 3.2 We note that the site was not proposed as an allocation for residential development in the 2019 Warrington Submission Plan [WSP 2019] and instead the previously developed part of the site was identified as an Employment Area under draft Policy DEV4. The explanatory text to the policy states:

“The site is ideally suited to power generation, being connected to the National Grid with supporting infrastructure on-site, having rail and road transport links, benefiting from a supply of cooling water and having a skilled workforce. Were a new power plant to come forward at the site in the future, this is likely to have a much smaller footprint than the existing Power Station, potentially freeing up land for power-related and other employment development.

The site has the potential to be a major focus for employment and economic activity linking with other initiatives within the area, including the Widnes Waterfront regeneration area in Halton. In order to fulfil its potential, it will be crucial that surrounding developments and initiatives do not unduly constrain power generation development opportunities at the site”.

- 3.3 The eastern part of the site, to the north of the railway line, and the land to the south of the railway line were identified as Green Belt. The land to the north of the railway line and parts of the land to the south were also identified as a Strategic Green Link (WSP 2019 Policy DC3) which the policy seeks to protect, enhance and extend. The land to the south of the railway line was identified as a Local Wildlife Site (WSP 2019 Policy DC4). Policy DC4 states that proposals for development likely to have an adverse effect on regionally and locally designated sites will not be permitted unless it can be clearly demonstrated that there are reasons for the development which outweigh the need to safeguard the substantive nature conservation value of the site or feature and the loss can be mitigated through off-site habitat creation to achieve a net gain in biodiversity/geodiversity assessed against the latest version of the DEFRA metric
- 3.4 An extract of the WSP 2019 Proposals Map is provided in Figure 1.

Figure 1 WSP 2019 Proposals Map Extract



Source: WSP 2019

- 3.5 From the above review of the WSP 2019, it is clear that there was no policy support for residential development on the site and the areas now proposed for residential development were afforded protection given their environmental and ecological value.
- 3.6 From review of the site on the WUPSVLP 2021 Proposals Map, it appears that Policy designations DC3 and DC4 still cover the same areas of the site in the latest version of the Local Plan, but given the poor quality of the plan it is not possible to confirm this (see Figure 2). However, if this is the case, we would question how the provisions of Policies DC3 and DC4 could be positively implemented given that significant amounts of residential development are now proposed in the areas they cover.

Figure 2 WUPSVLP 2021 Proposals Map



Source: WUPSVLP 2021

- 3.7 The site was not considered in the 2018 Strategic Housing Land Availability Assessment which formed part of the WSP 2019 evidence base, or the 2020 Strategic Housing Land Availability Assessment which has been produced since the consultation on the 2019 Warrington Submission Plan took place. The 2019 Urban Capacity Assessment¹ which also formed part of the WSP 2019 evidence base suggested that it was not suitable for housing and suggested the following future use:

“It is likely that a new power generating facility will then be developed on the site, but this would require a much smaller area. This would mean that land could be released for development, but the operator has confirmed this would be for employment development and not housing”.

Recent Appeal Decisions of Relevance

- 3.8 The availability of the site has also been the subject of consideration in a recent called-in appeal decision in Warrington² which highlights the uncertainties over its delivery. It states:

“The SWP and many interested persons made comments about the availability of Fiddlers Ferry Power Station as an alternative site. The Council does not consider that this constitutes an alternative site for the appeal proposal. Whilst closure of the plant has been announced, the decommissioning and demolition of the existing Power Station will take a number of years to complete. Further, the existing ash processing activities at the site are also expected to continue beyond the Power Station’s life span, until the existing deposits are fully depleted. Consequently, there is no certainty as to when the site will become available or indeed even a timetable for when that is likely to be known”.

- 3.9 In his Addendum report produced following the closure of the site, the Inspector also notes³:

“In these circumstances there seems to be very little, if any, change from the position set out in paragraph 384 of the main Report, namely that this site would only become available in the medium to long-term, and therefore does not represent a feasible or realistic alternative option for ESL’s current requirements. Accordingly the recent closure does not alter my original conclusions regarding this site”.

- 3.10 Draft Policy DEV4, DC3 and DC4 in the WSP 2019 and the previous assessments of the site by the Council therefore suggest that the site was not previously considered suitable for housing and the areas now proposed for residential development were afforded protection given their environmental and ecological value. The evidence the Council has produced for planning appeals suggests that there is no certainty over the availability of the site given the length of time required for decommissioning and demolition and the ongoing ash processing activities.

- 3.11 From review of the site on the WUPSVLP 2021 Proposals Map, it appears that Policy designations DC3 and DC4 still cover the same areas of the site in the latest version of the Local Plan. If this is the case, we would question how the provisions of Policies DC3 and DC4 could be positively implemented given that significant amounts of residential development are now proposed in the areas they cover.

¹ Warrington Urban Capacity Assessment (2019) §3.6

² APP/M0655/W/19/3222603 & APP/M0655/V/20/32 53083 - Land at Barleycastle Lane, Appleton Thorn, Warrington (December 2019) §273

³ Addendum Report to be Read Alongside the Report into APP/M0655/W/19/3222603 & APP/M0655/V/20/3253083 - Land at Barleycastle Lane, Appleton Thorn, Warrington (September 2020) §151

4.0 Duty to Co-operate

4.1 The main text of Duty to Co-operate [DtC] Statement (September 2021) does not provide any direct commentary on how Warrington Council is working with neighbouring Local Planning Authorities and other public bodies in delivering Fiddlers Ferry and relies instead on minutes of meetings held with these bodies. From the minutes of the meeting held with Halton Council on 13th July 2021 we note the following action point:

“It was agreed that housing and employment development at the Fiddlers Ferry site would count towards meetings Warrington’s needs, but the allocation policy will acknowledge the need for mitigation of impacts on Halton’s transport and social infrastructure and ensure a robust Green Belt boundary to maintain separate between Widnes and Warrington”.

4.2 The DtC Statement notes that the Council has prepared a separate and updated draft Statement of Common Ground [SoCG-2021] which provides a written record of the progress made by the Council in planning for strategic cross-boundary matters.

4.3 The Statement of Common Ground [SOCG]⁴ suggests that there are still outstanding strategic matters to be resolved between Warrington BC, Halton BC, St Helens BC and Highways England (now National Highways) with regards to the Fiddlers Ferry site, where it states:

“WBC will seek to ensure appropriate mitigation is provided to address any impacts on Halton’s transportation and social infrastructure arising from the allocation of Fiddlers Ferry, including agreeing the mechanisms by which any mitigation measures within Halton will be carried out.

WBC will work with Halton, St Helens and Highways England to identify and mitigate any impacts on Junction 7 M62”.

4.4 The SOCG⁵ also suggests that Gren Belt issues between Warrington and Halton have still yet to be resolved where it states:

“As WBC and Halton Borough Council progress with their Local Plans, there is a requirement for joint co-operative working to ensure adequate separation between areas of proposed Green Belt release in order to maintain the integrity of the Green Belt between Warrington and Runcorn and between Warrington and Widnes”.

4.5 We do not therefore consider that the above matters have been fully resolved and, as such the DtC remains outstanding. In this regard, we note that the relevant authorities have yet to formally sign the Statement of Common Ground at this stage. We are therefore concerned whether the Duty to Cooperate is legally compliant.

4.6 In addition, as identified in the Eddisons Transport Note which accompanies this note (Annex 1), the August 2021 Transport Model Testing is silent on any discussion or agreement in the modelling with the neighbouring Halton Council and although ‘engagement’ with National Highways [NH] is mentioned, in paragraph 8.106, there is no confirmation of any agreement with NH on any part of the modelling process.

4.7 Accordingly, we consider on the basis of the evidence available that the Council has not met its duty to cooperate which is in conflict with the relevant provisions of Section 20 of the Planning and Compulsory Purchase Act 2004.

⁴ Warrington Borough Council Statement of Common Ground (September 2021), page 12

⁵ Warrington Borough Council Statement of Common Ground (September 2021), page 9

5.0 Sustainability Appraisal

- 5.1 Having considered the findings of the Appraisal of Urban Extension Options in Appendix G of the Sustainability Appraisal [SA] prepared as part of the SEA process, we note that there are a number of issues with the Fiddlers Ferry site which raise questions over its suitability for allocation. The SEA assesses the site to be deficient in a number of regards and we consider that these deficiencies have not been properly considered and the negative effects will be greater than assessed. This is likely due to the fact that the site has only been introduced as an allocation at this late stage and insufficient time has been available to compile all of the relevant evidence and fully consider the effects of the site.
- 5.2 In particular, we note from the SA⁶ that the site performs poorly in Accessibility terms in comparison to the other growth areas considered and is assessed as having a ‘minor negative’ effect. This matter is assessed in detail in the Eddisons Transport Note which accompanies this note (Annex 1) and we summarise the key points below.
- 5.3 With regard to this matter the SA states:
- “It should be noted that only one bus route serves this area, making a regular service and capacity potential issues, with the scale of development being unlikely to increase the viability of new services being delivered (though employment growth on site could contribute towards viability alongside residential growth). The site is likely to deliver some limited onsite services such as a primary school and local shops and potential flexible health space. However, it is somewhat isolated in terms of accessibility to other shops and services, and secondary school, and as such may promote some car dependency. The scale of growth would be somewhat likely to deliver active travel infrastructural improvements, potentially making active travel more viable, however the site is over 5km from central Warrington and as such, some potential active travel potential journeys may instead be taken by private motor vehicle. Whilst the site could lead to some increases in congestion, especially at peak journey times (with the A562 and A57 most likely to be negatively affected), the size of the site increases the viability of infrastructure improvements intended to mitigate the effects of increases in traffic volumes. Overall, development in this location is predicted to lead to minor negative effects as accessibility would not be ideal in terms of walkability or public transport further afield”.*
- 5.4 This ‘minor negative effect’ compares very poorly with the alternative sites which are also assessed within the ‘accessibility’ section of Appendix G, as follows:
- South-East Warrington Urban Extension – a combination of moderate positive effect and minor negative effect.
 - Thelwall Heys – neutral effect.
 - South West Urban Extension - minor positive effect.
- 5.5 The accessibility of the site is therefore a significant issue and there does not appear to be any clear solution to addressing this matter. The site is poorly served by public transport and the SEA suggests that the provision of new services is likely to be unviable so it is difficult to see why any local bus service operators would choose to service the site. Given the site’s isolated location and limited facilities proposed it will be heavily dependent on existing facilities elsewhere. It is also doubtful whether active travel infrastructure improvements would discourage use of the

⁶ Sustainability Appraisal: SA Report (August 2021), page 357

private car given the distance of the site from Central Warrington and other services such as a secondary school.

- 5.6 Given the amount of development proposed on the site and the distance from central Warrington this is a fundamental concern as this lack of accessibility may result in increased trips by private car and increases in congestion which we have highlighted below is unlikely to be able to be suitably mitigated on land within the control of the Fiddlers Ferry site in any event..
- 5.7 Whilst the SEA suggests that impact on congestion could be mitigated there is no scheme of mitigation in place at present and for the reasons we have identified in the Eddisons Transport Note which accompanies this note (Annex 1) there is no certainty locally, as well as strategically, that the traffic likely to be generated by a redeveloped Fiddlers Ferry site can be suitably mitigated on the local and strategic road network.
- 5.8 For the reasons set out above, we consider that the SA vastly underestimates the impact of the Fiddlers Ferry site and the scheme. We therefore consider that the assessment of the site is deficient in this regard and the site is likely to have a 'major negative' effect in terms of accessibility.
- 5.9 Any increase in congestion is also likely to have a resultant impact upon Air Quality. With regard to Air Quality impacts the SA states the following⁷:
- This site is of a reasonable size and has a small number of shops and services in the nearby existing urban areas, whilst some additional ones may be delivered on site to cater for the growth, it is likely that a significant number of trips would take place between the site and central Warrington and / or other urban centres such as Widnes and Runcorn. Behavioural norms dictate that a significant majority of these trips would be taken by cars, potentially leading to localised air quality issues, especially at peak journey times and at traffic pinch points. This might also lead to the deterioration of the quality of air at the existing AQMA4, especially around the roundabout which connects Sankey Way with Liverpool Road. Moderately negative effects are predicted, which would be expected to reduce in the longer term.*
- 5.10 For the reasons set out above, we consider that the assessment underpays the impact of the site and the scheme is likely to have a major negative effect upon air quality. In addition, it is not clear how these effects would reduce in the longer term as no further explanation is given to justify this statement. As the amount of development on the site would gradually increase over time the opposite would be expected.
- 5.11 We also note that the site performs particularly poorly in Biodiversity terms and has the highest effect of the sites assessed. It is subject to a number of biodiversity constraints and the SA notes:
- "The northern part of the site is broadly brownfield but also contains mature trees and hedgerows with potential to be supporting protected species and several small areas of BAP priority habitats. This would be part of employment development though. Whilst development can likely avoid the loss of BAP habitats, it is likely to result in some loss to unprotected areas of trees, hedgerows and grasses which likely provide important undisturbed ecological connectivity between the BAP habitats on site, LWS to the south and the potential LWS to the east.*

⁷ Sustainability Appraisal: SA Report (August 2021), page 376

The housing element of the site falls within the Impact Zone for the Mersey Estuary SSSI with potential for development to have adverse effects from recreational pressures and pollution. Should ecological surveys reveal that the current areas for housing growth are low value, then the potential for biodiversity net gain exists.

At this stage, a precautionary approach is taken and minor negative effects are predicted in relation to the nearby Mersey Estuary. In addition, the developable area itself falls within a local wildlife site and direct impacts on the function and connectivity of this habitat could occur. It is likely that much of the area would not involve built development, but would involve publicly accessible open space. This could bring some disturbance to habitats, but by the same token, presents an opportunity to enhance the biodiversity value of the area.

Cumulatively, a moderate negative effect is predicted overall”.

- 5.12 The Consortium is also concerned that the biodiversity effects have not been properly assessed and may be worse. It is not clear how the Council can make assumptions on the significant impacts on biodiversity as it has not been confirmed at this stage what mitigation is to be provided.
- 5.13 For the above reasons, we do not consider that the site performs as strongly as has been assessed in the SA and there are a number of issues which raise questions over its suitability for allocation, in particular with regard to accessibility which is poor and given the size of the site is likely to result in significant use of the private car, leading to congestion and air quality concerns.
- 5.14 As a more general point, it is not clear how the Council can make assumptions on the significant impacts on the environment when it is not clear at this stage how the site is to be remediated and what mitigation is required.
- 5.15 In conclusion, it is the consortiums view that the SEA in relation to the assumptions made on Fiddlers Ferry is:
- 1 Fundamentally flawed as it results in an unsustainable approach to development.
 - 2 It is not sound and it is not legally compliant. Sections 19 and 20 of the Planning and Compulsory Purchase Act 2004 require engagement of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Consortium contends that the work that has been done to meet the requirements of the Regulations is not adequate.
 - 3 The identification and delivery of a brownfield site which has other fundamental technical delivery constraints should not surpass the allocation of other more sustainable greenfield releases where it is clearly not justified.
- 5.16 The Framework states that *“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered) [para.32].*
- 5.17 The Fiddlers Ferry Site is considered to have significant adverse effects in the context of its own plan objectives and its own SA objectives. We are of the view that the brownfield delivery can

not override the other fundamental issues the site has and the SEA/Council has not clearly demonstrated that they are capable of being mitigated.

6.0 Development Options and Site Assessment Technical Report

6.1 The 2021 Development Options and Site Assessment Technical Report considers five options for development in the Main Development Locations. The development of Fiddlers Ferry is considered as part of Options 2 to 5. From the options assessed we note that there are a number of issues identified with the site including:

- 1 With reliance upon remediation of the site there would be limited opportunity for the delivery of new homes early in the plan period given the lead in times for infrastructure to support the developments and the need for demolition and remediation.
- 2 The demolition and remediation of the Power station is dependent on the enabling residential development requiring Green Belt release (which would need to be viable).
- 3 Development at Fiddlers Ferry will include releasing parcels making a strong and moderate contribution to the Green Belt in this location. This option includes the release of Green Belt in the direction of neighbouring Halton in both the north towards Widnes and south towards Runcorn. The cumulative impact of this and the impact on separation between the towns in the two boroughs is an important consideration.
- 4 Whilst the Fiddlers Ferry site provides for some development beyond the plan period, this is of a relatively small scale (approximately 450 units).
- 5 Proximity to Widnes is a factor. Some of the economic benefits associated with development could be felt in Widnes Town Centre rather than Warrington Town Centre. Given the large number of homes proposed, we consider that the delivery of development on alternative sites would be preferable where this would allow the more of the economic benefits of providing these homes to be felt within Warrington.
- 6 It may increase pressure on some local roads in Penketh and Great Sankey and on Junction 8 of the M62.
- 7 Development will need to have regard to heritage assets in the vicinity of the site, including those in the borough of Halton.

6.2 We have expanded upon a number of these issues in further detail in the remainder of this note.

7.0 Local Plan Transport Modelling

7.1 The Transport Model Testing of the WUPSVLP 2021 dated August 2021 has included an assessment of the inclusion of the Fiddlers Ferry site within the modelling exercise.

7.2 For the reasons set out in the Eddisons Transport Note which accompanies this note (Annex 1), our view is that the results of that modelling on a network wide basis has not been presented in sufficient detail to establish any view as to how the network is likely operate with the Fiddlers Ferry site in the 2038 future assessment year.

7.3 In addition, the presentation of the modelling results do not allow any sort of comparison between the results of junction and network modelling from the previous Local Plan development strategy ie with the SWUE, for example, and without the Fiddlers Ferry site, and the one being progressed now, ie without the SWUE, for example, and with the Fiddlers Ferry site.

- 7.4 This should be a critical thread of how the Local Plan strategy has evolved in recent years and should provide the evidence that the current strategy is more beneficial in transport terms than the previously proposed one, or at the very least acceptable in terms of, in this case, traffic impact on the local and strategic road network.
- 7.5 Moreover, there is no detailed traffic impact analysis contained within any of the Local Plan documents that would allow an assessment of the impact of the Fiddlers Ferry site and a confirmation that all of the mitigation required to ensure that the impact of the proposals was not 'severe', in the context of the Framework, could be delivered without requiring third party land. It is clear from the August 2021 report, for example on the 'Analysis of Metric' information on Page 69, that the Fiddlers Ferry site will increase traffic flows along the A562.
- 7.6 The A562 is the main local highway route between Warrington and Widnes with a number of key junctions along its length, including the Fiddlers Ferry Gyratory in Widnes to the west, the 'Lane End' junction and the A57 roundabout junction towards Warrington town centre, to the east.
- 7.7 There are comments in the August 2021 report that suggest that mitigation can be provided on the local highway network that would be able to be provided to accommodate the traffic that would be generated by a redevelopment of the Fiddlers Ferry site.
- 7.8 This is confirmed in Paragraphs 9.10 and 9.11 with increases in flow along the A562, the A557 (in Widnes) and to and from the M62 Junction 7.
- 7.9 However, the August 2021 document provides no evidence of any agreement on the network modelling that has been carried out within the 2021 Local Plan documents with the neighbouring Halton Council and National Highways (NH), although 'engagement' with NH is mentioned, in paragraph 8.106. In addition, no mitigation has been agreed with either Halton Council or NH on their network to ensure adequate mitigation of the Fiddlers Ferry site.
- 7.10 In this context the Framework (2021) states at para 27 that in order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency. Given the cross-boundary implications of Fiddlers Ferry on Halton and Warrington we would expect that this should be clearly set out and the relevant highways authority should provide open transparent documentation of the assessment work and predicted impacts.
- 7.11 Given the strategic importance of these routes and the regional status of Junction 7 of the M62, and the absence of any agreed highways mitigation concept scheme. there is absolutely no certainty whatsoever that the infrastructure required to accommodate the Fiddlers Ferry site can be achieved. For example, the 'Lane End' junction, which is the A562/Liverpool Road junction, is a signalised arrangement that is inevitably going to be impacted by any redevelopment at the Fiddlers Ferry site. This junction is very constrained on all sides by existing development and any physical mitigation to improve the capacity of this junction is highly likely to require the acquisition of third party land and there is no certainty of this land being acquired.
- 7.12 In addition, the gyratory system at the A562/A557 (Fiddlers Ferry Junction) is a junction that serves as the approach route to the Mersey Gateway bridge to the south. As with the Lane End junction, this signalised intersection is constrained on all sides by existing development and

third party land. Once again, any physical mitigation to improve the capacity of this junction is highly likely to require the acquisition of third-party land.

- 7.13 As such, it is clear that there is no certainty locally, as well as strategically, that the traffic likely to be generated by a redeveloped Fiddlers Ferry site can be suitably mitigated on the local and strategic road network. It is Eddisons view that in the context of the Framework [para 35] as the evidence supporting the Fiddlers Ferry site is not positively prepared, it is not justified as there is a lack of evidence provided in relation the mitigation of the impacts. It is not consistent with national policy as it fails to meet the requirements of the Framework para 104.
- 7.14 Another issue with the current Local Plan allocations is the lack of alignment between the Transport Model Testing of the WBC Local Plan dated August 2021 document and the Development Options and Site Assessment Technical Report dated September 2021. The latter document refers to 5 development options which are covered within the report.
- 7.15 None of these options are referred at all in the Transport Model Testing document dated August 2021. As such, there is no comparison that can be made between the impacts of the various Local Plan options at all. This would include an appropriate cumulative assessment of the Local Plan options from the Development Options and Site Assessment Technical Report, which as far as we understand, is the most recent of the Local Plan evidence documents available.
- 7.16 Similarly, the 5 Options are also not referred to in the Warrington Western Link Note by Mott Macdonald dated September 2021.
- 7.17 Due to the current lack of evidence currently available to demonstrate the clear harms can be successfully mitigated by development, it is clear that the Fiddlers Ferry draft allocation is contrary to national policy and at present there is no evidence that the site would not generate a severe residual cumulative impact on the road network, contrary to para 110 (bullet (d)) and 111 of the Framework. As such the policy is unsound.
- 7.18 Further details on this matter are provided in the Eddisons Transport Note at (Annex 1).

8.0 WUPSVLP 2021 Draft Policy MD3 – Fiddlers Ferry

- 8.1 Draft Policy MD3 of the WUPSVLP 2021 states that land at the site will be allocated to deliver a mixed-use development comprising:
- 1 Approximately 101ha of employment land; and,
 - 2 A minimum of 1,760 new homes of which the Trajectory at Appendix 1 of the SVLP indicates that 1,310 homes will be delivered in the plan period as follows:
 - 35 homes on the northern parcel in years 1 to 5 (2021-26);
 - 350 homes on the northern parcel in years 6 to 10 (2026-2031);
 - 570 homes on both parcels in years 11 to 15 (2031-3026); and,
 - 355 dwellings on both parcels in years 16 to 18 (2036-39).
- 8.2 The supporting text to the policy indicates that development is divided into 2 phases:
- 1 The first phase will include the employment site and the northern residential parcel to the north of the railway line
 - 2 Development to the south of the railway line will fall into the second phase of development in the latter part of the plan period and beyond.

- 8.3 The allocation will include the removal of 82 ha of land from the Green Belt to accommodate a minimum of 860 new homes on land to the north of the railway line and a further 900 homes to the south of the railway line (450 homes in the plan period and 450 homes in the post plan period).
- 8.4 The supporting text to the policy states that the final form of development will be determined through the preparation of a comprehensive Development Framework, to be approved prior to the submission of any planning applications for the development of the site. However, no timescales or process for its production have been set out in the Plan or the supporting evidence. The Development Framework will include a more detailed masterplan for the area and a strategy to ensure the timely delivery of supporting infrastructure.

9.0 Site Constraints

- 9.1 Fiddlers Ferry is a large, complex brownfield site which is subject to a range of constraints that will need to be addressed both at the planning application and development stages. The Regeneration Vision⁸ for the site recognises that the site by nature is complex in terms of physical characteristics and we have provided an overview of some of the key constraints identified in the document below:
- 1 The existing overbridge of the railway line and canal (which also accommodates a number of pipelines) will need to be upgraded or replaced as necessary to create sufficient capacity for the level of development to be provided to the south of the site.
 - 2 The redevelopment of the site will require a series of infrastructure improvements to highway junctions. Suitable access to the site will also need to be provided. The Regeneration Vision⁹ currently identifies three points of vehicular access to the Widnes Road, with a dedicated residential and mixed-use access on the alignment of the current main access to the site, together with two additional points of access to the west for the employment area. The form of these accesses has yet to be identified but given the capacity of traffic they will need to accommodate, they are likely to require significant modifications to the existing highway, particularly if roundabout junctions are required and this will take time to implement. The Consortium notes that it may also be that case that third party land is required depending upon the modifications required.
 - 3 The site falls within the Impact Risk Zone of the Mersey Estuary Site of Special Scientific Interest, Special Protection Area and Ramsar site and the site is potentially functionally linked to these designated sites.
 - 4 Within the site there are multiple areas recognised as priority habitats listed under Section 41 of the Natural Environment and Rural Communities Act 2006, including coastal saltmarsh and deciduous broadleaved woodland. Additionally, the site supports rare and diverse habitats including unimproved neutral grassland, native hedgerows, swamp and large areas of open standing water. Lesser Spearwort, a species listed as vulnerable, and the non-native invasive species Giant Hogweed, Japanese Knotweed and Indian Balsam have been confirmed to occur on site.
 - 5 The site has also been confirmed to support, or likely supports, protected and/or notable invertebrates, fish, amphibians (including great crested newt), reptiles, breeding and

⁸ Fiddlers Ferry Power Station Regeneration Vision (August 2021) page 13

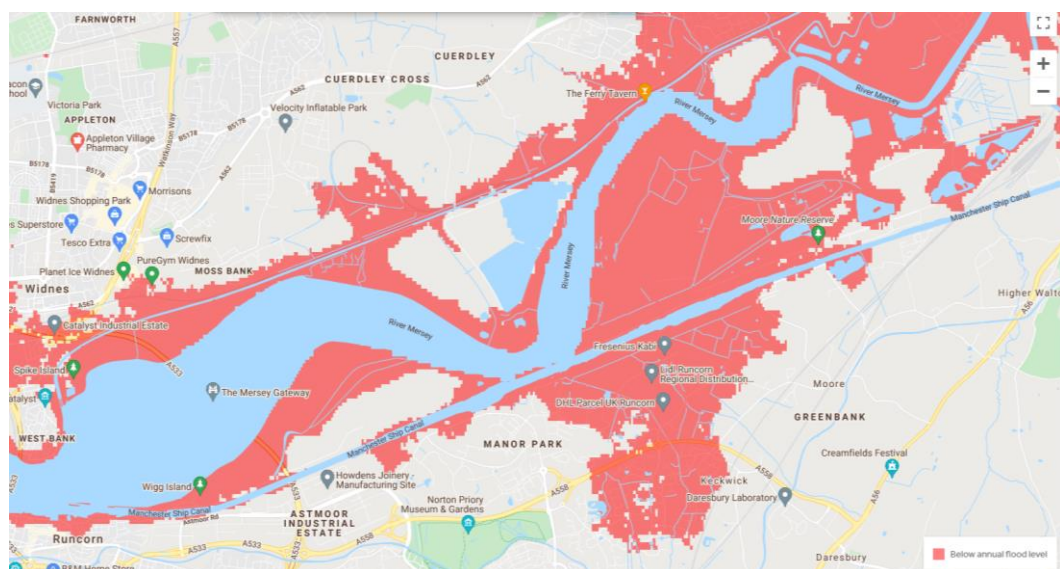
⁹ Fiddlers Ferry Power Station Regeneration Vision (August 2021) page 28

overwintering birds, roosting and foraging / commuting bats, otter, water vole, badger and other mammals.

- 6 A series of archaeological and heritage constraints principally dating from the Medieval and Post-Medieval periods have been identified. Known heritage constraints include potential for agricultural and economic activity associated with the monastic influence of Norton Priory at Runcorn on its surrounding landscape, and a stretch of Medieval flood defence bank located within the site boundary known as Cromwell's Bank. The Severn Vyrnwy Aqueduct is also an historic feature crossing the site. The aqueduct and power station are considered to be of overall 'medium' heritage value. There are some examples of built heritage in the site, including a reused Second World War Nissan hut and brick structure associated with the Vyrnwy Aqueduct.
- 7 The Framework identifies the need for a Flood Risk Assessment (FRA) to support any future redevelopment of the site as it is partly located in Flood Zone 3 on the Flood Map for Planning (Rivers and Sea). The initial Flood Risk review undertaken for the site demonstrates that the site is at risk from flooding from other local sources that should be considered in a site-specific FRA. It is not therefore clear at this stage how this would affect the development of the site, including the residential parcels.

Research also suggests that the site may be adversely affected by rising sea levels within the next 10 years. With regard to this matter, we note the findings of Climate Central¹⁰ research which outlines the parts of the North West projected to be below the annual flood level by 2030 and so in danger of rising sea levels, with areas shaded red those projected to be 'lower than the selected water level and with an unobstructed path to the ocean'. Parts of the Fiddlers Ferry site fall within these red areas as shown in Figure 3. This could have a resultant impact on development on the site and its ability to deliver the number of new homes envisaged.

Figure 3 Land projected to be below annual flood level



Source: Climate Central Coastal Risk Screening Tool

¹⁰ Climate Central is an independent organization of leading scientists and journalists researching and reporting the facts about our changing climate and its impact on the public.

- 8 The site has been operational as a coal fired power station since 1971. There is evidence of potential contamination relating to several historic landfills and infilled areas of land. There are also numerous bulk storage tanks used for the storage of a variety of substances. Subsurface structures include the coal plant basements, from which water was pumped out to the coal pad and then into the surface water drainage system. Similarly, water pumped from the substation and turbine hall could have entered the surface water drainage system in this way. There are also records of asbestos containing materials on site. It is therefore highly likely that significant site remediation will be necessary.
 - 9 A number of utilities either cross the site or are located in proximity to the site. Running north-south immediately to the east of the northern site, and running under the southern site, is a major Ethylene pipeline operated by Essar Oil (UK). A gas pipeline operated by Cadent Gas Limited, runs east-west, predominantly off-site along the railway corridor. Immediately to the west of the site on the western boundary is the chemical works. In all three cases there are safety zones with restrictions on land use, especially residential development which require consultation with the HSE when development is proposed.
 - 10 Within the approximate centre of the northern site, and immediately to the east of the Vyrnwy Aqueduct corridor, is a major substation operated and owned by National Grid. This was built to transmit electricity from the power station to the national grid. Leading from this are a series of 400kV and other high voltage powerlines. To the east of the substation there are also two terminal towers towards the north and south boundary of the northern site, with an underground high voltage cable running between them through the site. The overhead high voltage lines follow the approximate route of the Vyrnwy Aqueduct corridor north and south, and the railway corridor to the east, then leading off-site to the wider network. The intention is that the substation and its immediate setting, together with the high voltage power lines and associated infrastructure comprising pylons and underground cables, will be retained in situ. The exact nature of their retention in terms of surrounding land use, would be subject to more detailed design and approvals at the appropriate time.
 - 11 Crossing the site north-south, and dividing the site almost in equal parts, is the Vyrnwy Aqueduct as mentioned previously. This 110 km aqueduct and associated pipework, operated by United Utilities, carries in excess of 200 million litres of water a day from a man-made lake in north Wales to Liverpool. It has legal restrictions preventing most development over it and will be preserved in situ within a green open space corridor. Development over it, including highway crossings require agreement.
 - 12 The power station site encompasses many kilometres of other largely redundant services and pipework which will be removed during redevelopment.
- 9.2 Given the number and extent of these constraints, it is unknown at this stage that all can be successfully mitigated. If mitigation is possible, dealing with these matters is likely to result in an extensive application preparation and determination process prior to any of the extensive remediation taking place. The Consortium considers that this will have a significant impact upon the delivery of new homes on the site and the areas which may be capable of coming forward for development.
- 9.3 For example, the ecology issues on the site are complex and could affect both the speed of application preparation and the development potential of the site. With regards to this matter, the supporting text to Draft Policy MD3 highlights the need to avoid adverse effects on the integrity of the Mersey Estuary SPA through loss of functionally linked habitat and disturbance

from construction and operation. It requires surveys to be undertaken during autumn, winter and spring so would effectively require almost a whole year to be devoted to survey work. If habitat within the site or adjacent land are considered functionally linked land (FLL) and identified to support significant populations of qualifying bird species avoidance measures and mitigation will be required and the planning application will need to be assessed through a project specific Habitats Regulations Assessment. This could potentially involve the loss of land earmarked for residential development.

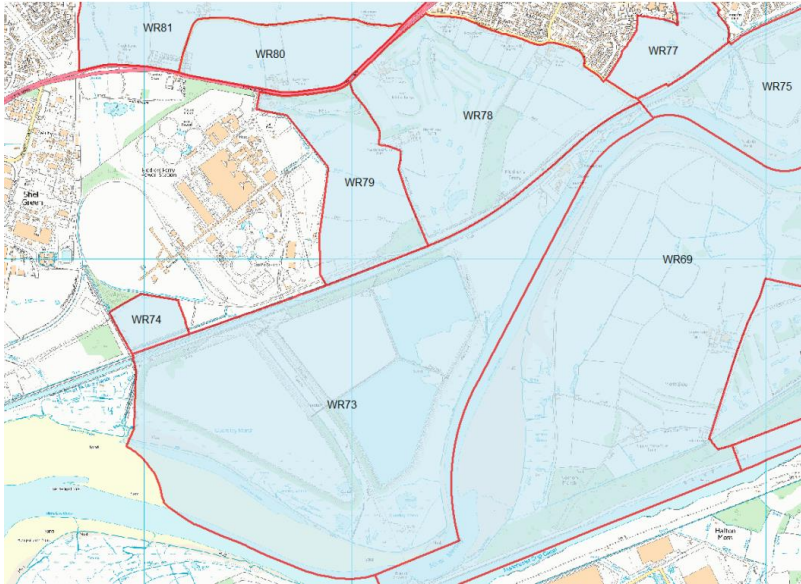
- 9.4 The site is also characterised by extensive biodiversity and is within a SSSI, an SPA and a Ramsar site. Not only that but there is evidence of a wide array of protected species on the site (Great Crested Newts, Badgers, Bats etc). By the time an application proceeds on this site, it is almost certain that the Environmental Bill will have gained royal assent and there will be a requirement to deliver a 10% betterment on existing Biodiversity (or possibly more if WBC seek a higher level) . This will be a very complex site to meet such a requirement given the characteristics and a significant proportion of the site may need to be given over for Biodiversity purposes which will affect the developable areas.
- 9.5 The above information only provides a snapshot of the constraints on the site based on the information which has been made available. As further investigative work is undertaken, it may be the case that further complexities are discovered and this would not be surprising given the size and previous industrial use of the site.

10.0 Green Belt

- 10.1 The area to the east of the power station structures on the northern site, together with the whole of the southern site, is currently in Green Belt and the allocation will require the removal of 82ha of Green Belt land.
- 10.2 A review of the site's existing contribution to Green Belt purposes and the potential implications of releasing the site (in terms of any harm to the function and integrity of the Green Belt) has been undertaken by Arup on behalf of the Council¹¹. The parcel boundaries covering the site are shown in Figure 4.

¹¹ Warrington Borough Council Fiddlers Ferry Green Belt Assessment (April 2021)

Figure 4 Extract of the South Western Parcels from the Green Belt Assessments 2016



Source: Fiddlers Ferry Green Belt Assessment

- 10.3 A summary of the assessment outcomes for parcels WR73, 74, 75, 78 and 79 is provided in Figure 5.
- 10.4 With regard to Parcel WR79, the Consortium considers that the contribution of the parcel to Purpose 2 should be 'Strong' rather than 'Moderate' given the key strategic function this parcel performs in separating the urban areas of Warrington and Widnes. In this regard, we note that the adjacent Parcel WR78 is assessed as making a 'Strong' contribution to this purpose.
- 10.5 The overall results of the assessment for the parcels covering the site are that it makes either a 'Moderate' or a 'Strong' contribution to the Green Belt purposes (Strong being the highest rating).

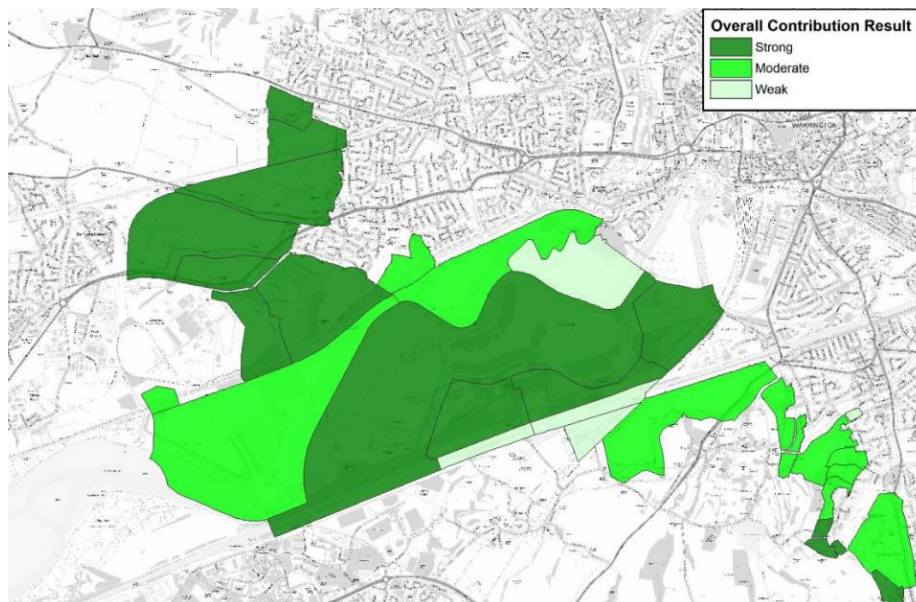
Figure 5 Parcel Assessment

Parcel Ref	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5	Overall Assessment
WR73	No contribution	Strong contribution	Moderate contribution	No contribution	Moderate contribution	Moderate contribution
WR74	No contribution	No contribution	Strong contribution	No contribution	Moderate contribution	Moderate contribution
WR75	Moderate contribution	Weak contribution	Moderate contribution	No contribution	Moderate contribution	Moderate contribution
WR78	Moderate contribution	Strong contribution	Strong contribution	No contribution	Moderate contribution	Strong contribution
WR79	No contribution	Moderate contribution	Strong contribution	No contribution	Moderate contribution	Strong contribution

Source: Fiddlers Ferry Green Belt Assessment

10.6 The choropleth at Figure 6 shows the overall assessment outcomes for the parcels.

Figure 6 Choropleth map showing the overall assessments



Source: Fiddlers Ferry Green Belt Assessment

10.7 The Consortium notes in particular the assessment of the Green Belt between the Warrington and Widnes urban areas where an overall ‘Strong’ contribution has been identified. This area provides a vital strategic Green Belt gap which separates the two towns and prevents them from merging. In considering the overall harm to the Green Belt the Assessment notes¹²:

“Purpose 2 – Development of the site would reduce the separation between the Warrington urban area, Widnes and Runcorn. In relation to the northern section of the site, the parcel of land to the east of Marsh Lane would continue to provide a degree of separation between the Warrington urban area and Widnes however this remaining gap would be the narrowest point between the towns”.

10.8 The Assessment therefore recognises that the Green Belt gap between Warrington and Widnes will be reduced to its narrowest point as a result of the removal of this Green Belt. The reduction in the gap would be significant, the extent of the Green Belt would be significantly reduced from approximately 900m to 600m, and the development of the site would therefore make a major contribution to the coalescence of the two settlements contrary to the Framework [§138].

10.9 The parcel assessments which have been included in the Fiddlers Ferry Green Belt Assessment derive from the 2016 Green Belt Assessment covering the whole authority area¹³. Whilst not referred to in detail in the Fiddlers Ferry Assessment, we note that the 2016 Assessment also included a Stage 1 General Area assessment in which larger parcels were assessed. The area of land separating Warrington and Widnes is identified as General Area 17 as shown in Figure 7. The assessment of this General Area against Purpose 2 is that it makes a ‘Strong’ contribution and the following commentary is provided¹⁴:

¹² Warrington Borough Council Fiddlers Ferry Green Belt Assessment (April 2021), page 10

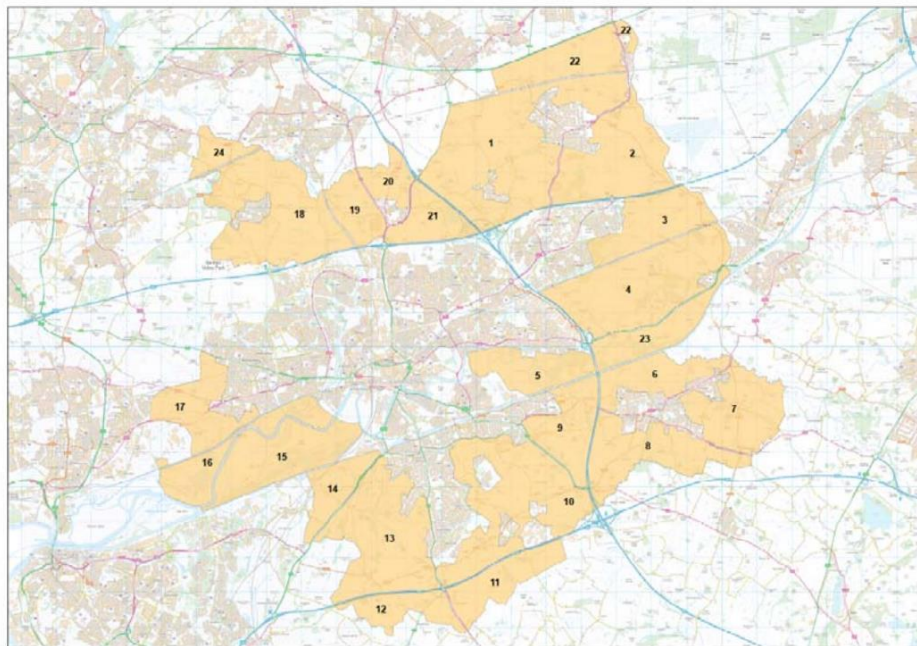
¹³ Warrington Borough Council Green Belt Assessment Final Report (October 2016)

¹⁴ Warrington Borough Council Green Belt Assessment Final Report (October 2016) pages F8 and F9

“Strong contribution: The GA forms an essential gap between the Warrington urban area and Widnes in the adjacent neighbouring authority of Halton, whereby a reduction in this gap would result in the actual merging of all these towns. Overall the GA makes a strong contribution to preventing towns from merging”.

- 10.10 The 2016 Green Belt Assessment therefore also acknowledges that this area of Green Belt performs a ‘Strong’ strategic function in separating Warrington and Widnes.

Figure 7 General Areas Map



Source: Warrington Green Belt Assessment 2016

- 10.11 The Consortium notes that the part of the site which lies within this gap comprises agricultural land rather than forming part of the previously developed land to the west on which the power station buildings are located. No clear justification has been provided for the release of this Green Belt part of the site. The supporting text to draft Policy MD3 suggests that it is important in enabling the remediation of the power station itself but no further explanation is given. Whilst the Development Options and Site Assessment Technical Report expands on this slightly and suggests that the residential development is required for this remediation, no evidence is provided to demonstrate that all of land proposed for release is actually required. It is also unclear what the statutory responsibilities/obligations for SSE to remediate the site are, and if they have such a responsibility, whether it is necessary to release Green Belt for new homes. There is therefore a lack of transparency and the Consortium considers that insufficient justification has been provided for the release of this land.
- 10.12 The Consortium would also question why there has been a partial review of the Green Belt at the Fiddlers Ferry site in isolation, looking at the contribution, the implications of harm and mitigation for the site only. We would have expected other Green Belt sites to have been assessed on a similar basis at this stage to ensure that all reasonable alternatives were properly considered.

- 10.13 We note that the Green Belt Assessment provides no photographic viewpoints from the part of the site to the north of the railway line. It is not clear why this is the case given that this part of the site plays a major role in contributing to the Green Belt purposes but this may be a tactic of the Council in an attempt to downplay the impact.

11.0 Density

- 11.1 Part 12 of draft Policy MD3 requires that residential development on the site is constructed to an average minimum net density of 35 dwellings per hectare (dph). Whilst not specifically confirmed in the policy or supporting text, this density appears to have been informed by the Density Assessment¹⁵ prepared for the site by SLR Consulting, which is included in the evidence base. Having reviewed this document, we are concerned that it does not provide sufficient evidence to support the proposed minimum density of 35 dph and consider that the actual density is likely to be lower. This is particularly pertinent on this site given the proposed location, the need for larger family homes as required by the mix in the Housing Needs Assessment and the necessity for the sensitive treatment of the surrounding Green Belt boundaries.
- 11.2 The Density Assessment includes a review of six applications in Warrington for comparison purposes, all of which now benefit from planning permission. We note that of these six applications, only one is in excess of 35 dph and the Assessment also notes that this scheme (Spectra Park) includes slightly higher proportion of apartments. This site differs in character to Fiddlers Ferry, as it is not a peripheral Green Belt site and comprises brownfield land located in close proximity to Warrington Town Centre, where densities would generally be expected to be higher, and apartment development would be more prevalent, given proximity to services and the character of the surrounding area. It is not therefore a suitable comparator to use. The examples provided do not therefore provide any substantive evidence to support the minimum 35dph proposed on the Fiddlers Ferry site.
- 11.3 The Density Assessment also considers three sites in Halton. However, as the proposed allocation does not fall within the Halton authority boundary, Halton and the proposed residential plots would be located a significant distance from any residential development in Halton, it is not clear why these sites have been considered. It is also worth noting that 2 of the 3 applications in Halton date back to 2014 and it is not clear why these applications were selected or if the Council was cherry-picking older examples to suit its argument.
- 11.4 In any event, whilst the density of the identified schemes in Halton is higher, the Assessment notes that these are more urban in form and akin to town centre type schemes, so we do not consider that they provide a fair comparison to the Fiddlers Ferry site given its Green Belt status.
- 11.5 Section 4 of the Density Assessment provides an indicative housing mix with associated unit floor areas. We consider that the floor areas identified are generally too low with particular regard to the fact that the WUPSVLP 2021 (Draft Policy DEV2) seeks the provision of new homes in accordance with the Nationally Described Space Standard [NDSS]. The Policy also seeks the provision of all homes to Regulation Standard M4(2) 'Accessible and Adaptable dwellings' with a 10% requirement for M4(3) 'Wheelchair User Dwellings'. We understand there may be a shift in Building Regulations towards total compliance with the M4(2) regulations and a set percentage of M4(3) homes as opposed to 'optional standards' which could

¹⁵ Fiddlers Ferry Density Assessment (April 2021)

be in place when the site is brought forward. It is not clear whether the implications of this policy and these potential changes to the Building Regulations have been considered when identifying the floor areas but the Consortium considers that they would completely skew the density of the scheme.

- 11.6 The impact of NDSS will be most noticeable for the larger units (i.e. not apartments) given the greater number of bedrooms. We have provided below an example of the floor areas which would typically be provided in units built to NDSS based on information provided by our housebuilder client Story Homes, all of which are significantly in excess of the floor areas identified in the Density Assessment.

Table 1 Market Housing Average Floorspace Assumptions

Number of Beds	Council's Assumed Average Floor Space	Housebuilders Average Floor Space to comply with NDSS	Difference
2 Bed Semi	725 sq.ft	769 sq.ft	44 sq.ft
3 Bed Semi	875 sq.ft	1,008 sq.ft	133 sq.ft
3 Bed Detached	1,025 sq.ft	1,052 sq.ft	27 sq.ft
4 Bed Detached	1,325 sq.ft	1,488 sq.ft	163 sq.ft

- 11.7 We also note that Table 4 of the Density Assessment provides separate floor area details for affordable units which appear to be lower than their market equivalents. As affordable units are typically 'tenure blind' it is not clear why this distinction has been made and we would expect these units to have the same floorspace as their market equivalents. This will have a resultant impact of increased floor area thus reducing potential density.
- 11.8 The Consortium also considers that there is a lack of clarity as to how the net residential areas identified in Figure 2.1 of the Density Assessment have been derived. The figure provides the following indicative areas:
- Phase 1: Residential / Mixed Use Centre - 27.32ha / 860 dwellings
 - Phase 2: Residential / Mixed Use Centre – 28.75ha / 900 dwellings
- 11.9 The note on Figure 2.1 suggest that this assumes a near net density of c.35dph less 10% for internal green space. However, it is not clear whether any deduction has been made for the provision of road infrastructure within the residential parcels, which would normally be expected as part of a net density calculation. If not, the site area used to calculate the number of homes on each phase is likely to be too high.
- 11.10 Figure 2.1 also notes that the indicative land areas are subject to advice on Biodiversity Net Gain [BNG]. It is not therefore clear at this stage what level of impact this will have upon the developable areas within the site but this could have a resultant impact upon the area available for residential development. In this regard, we note that the Site Assessment Proforma for Fiddlers Ferry¹⁶ suggests that the southern portion of the proposed residential allocation lies within the Upper Mersey Estuary Local Wildlife Site and is not suitable for biodiversity off-setting. This suggests that the northern part of the site may be required for this purpose and given the array of biodiversity on the site, the mitigation required will be extensive.

¹⁶ Updated Proposed Submission Version Local Plan - Additional Site Assessment Proformas (Sept 2021)

11.11 The Density Assessment¹⁷ states that the assumptions used “*would lead towards a logical conclusion that a density in the mid to high 30s as an average net density would be appropriate*”. However, for the reasons identified above we do not consider this to be the case and the overall deliverable density on the site is likely to be lower than the 35dph minimum currently identified in Draft Policy MD3.

11.12 The identified capacity of a minimum of 1,760 new homes is therefore unlikely to be achieved.

12.0 Viability

12.1 An assessment of the viability of the Fiddlers Ferry site has been undertaken by viability specialist Roger Hannah on behalf of the Consortium and is attached at Appendix D of our Issues Report.

12.2 A summary of the key findings of the Roger Hannah assessment is set out below.

12.3 The assessment notes the LPVA conclusion that Fiddlers Ferry is marginal based on an indicative scheme of 300 residential dwellings, just over 1.4m sqft of industrial development and c. 800 sq ft of retail development. It also concludes that the proposed commercial development at the site is unviable on a stand-alone basis, generating a “*significant deficit against the BLV*”.

12.4 Many of the appraisal assumptions for Fiddlers Ferry mirror the typology assumptions, except for the allowance of strategic infrastructure costs as set out in the IDP. The IDP costs on this basis for the whole site, Phase 1 and Phase 2 of the proposed Fiddlers Ferry development total £123,038,799. The LPVA only includes £90,174,299 against the proposed residential development at the site.

12.5 Roger Hannah have cross checked the included costs against the IDP costs and cannot verify the apportionment of the costs in the Fiddlers Ferry appraisal. It is not clear how the IDP costs are apportioned against the residential and commercial development in the context of the total cost of £123,038,799. It appears that there is no allowance in the LPVA Fiddlers Ferry appraisal for the commercial abnormal costs, which is a significant underestimation of cost based on the information in the IDP.

12.6 Based on Roger Hannah’s review of the IDP, it is possible to apportion these costs against the appropriate phases and uses on site. This is because the IDP sets out costs for the whole site (off-site works), Phase 1 and Phase 2 accordingly, splitting out the proposed Phase 1 costs associated with the residential and commercial development. They would therefore recommend that the costs are apportioned in this way in any appraisal of site viability.

12.7 Given that Phase 1 of the residential development is due to come forward first to fund the demolition/remediation costs for the power station and loss-making employment development, we believe it is prudent to appraise the viability of the site on this basis. They have therefore assumed that the proposed residential development associated with Phase 1 would come forward in three phases as follows:

- Phase 1 – residential development of 300 units
- Phase 2 – residential development of 300 units
- Phase 3 – residential development of 260 units

¹⁷ Fiddlers Ferry Density Assessment (April 2021), page 8

- 12.8 This reflects the planned split of 860 units across Phase 1 as set out in the IDP. The commercial development is likely to follow this, on the basis that the land receipts associated with the residential development can be used to fund the demolition/remediation of the power station itself. Phase 2 of the development would then follow this, assuming it is deliverable.
- 12.9 Roger Hannah have appraised the residential phases within Phase 1 on an individual basis, with the results as follows:

Figure 8 Roger Hannah Fiddlers Ferry Phase 1 Residential Appraisals

Phase	Residual Land Value	Benchmark Land Value	Surplus/Deficit
Phase 1	-£5,804,160	£3,214,285	-£9,018,445
Phase 2	-£5,804,160	£3,214,285	-£9,018,445
Phase 3	-£5,033,250	£2,785,715	-£7,818,965

Figure 24: FF Phase 1 Residential Appraisal Results

Source: Roger Hannah

- 12.10 These appraisals are undertaken in isolation to assess the residual land value associated with the residential development on a standalone basis. This is because the land receipts associated with the residential development on the adjoining land to the power station are required to fund the £37,513,699 associated with the demolition/remediation of this site and the £32,100,000 of abnormal costs associated with the commercial development.
- 12.11 The residential phases do not produce a positive land value and are therefore wholly unviable. Not only does this not reach the required BLV in viability terms to justify policy compliant residential development on a standalone basis, but it does not generate any of the surplus required to fund the demolition/remediation of the power station site and the associated commercial development. This also demonstrates that the residential development associated with Phase 2 would also be unviable, as our appraisals do not account for any of the additional costs associated with the bridge, network rail ransom and country park, which total £26,750,000.
- 12.12 The residential development therefore cannot cross subsidise the demolition/remediation required to the power station or the loss-making commercial development. The residential development is also incapable of meeting planning policy and affordable housing requirements on a stand-alone basis because the residual land value of the phases is negative and therefore falls well below the required BLV for the site.
- 12.13 In addition, there are other technical site constraints that have not been appropriately considered. These issues relate to flooding/drainage, ground conditions, highways, utilities, sustainability, and site density and result in additional costs and less residential development on site. Should these factors be accounted for in an appraisal, the viability position would only worsen.
- 12.14 In light of these findings, Roger Hannah therefore conclude that the Fiddlers Ferry site is wholly unviable. As such, it is neither deliverable nor developable and its inclusion as a mixed-use allocation is therefore contrary to the Framework [§68].
- 12.15 We also note that LPAs had the opportunity to apply for the Brownfield Land Release Fund [BLRF] between April and June 2021. We understand that the Warrington BC bid for funding from the BLRF was unsuccessful, so this did not provide a route through which the Council can obtain funds to help deliver the Fiddlers Ferry site.

13.0 Delivery Timeline

13.1 The supporting text to Policy MD3 notes that the Council anticipates development will commence in 2025/26 taking into account the need to prepare the Development Framework, the demolition of the Power Station and initial required infrastructure improvements. The Trajectory at Appendix 1 of the SVLP indicates the delivery of 1,310 homes over the plan period as follows:

- 35 homes on the northern parcel in years 1 to 5;
- 350 homes on the northern parcel in years 6 to 10;
- 570 homes on both parcels in years 11 to 15; and,
- 355 dwellings on both parcels in years 16 to 18.

13.2 A detailed breakdown for the site is shown in Table 2.

Table 2 SVLP 2021 - Fiddlers Ferry Site Capacity and Trajectory

SVLP 2021 - Fiddlers Ferry Site Capacity and Trajectory					
	Overall Capacity (Plan Period)	1,310			
	Years 1-5 (2021-26)	Years 6-10 (2026-31)	Years 11-15 (2031-36)	Years 16-18 (2036-39)	Total
Houses (Northern Parcel)	35	350	300	175	860
Houses (Southern Parcel)	0	0	270	180	450
Overall Capacity					1,310

Source: SVLP 2021

13.3 The Consortium has fundamental issues with then claimed delivery rates and in particular are keen to challenge the notion of the proposed completion of 35 dwellings within the first five years of the plan period. In addition, we consider that the overall delivery trajectory for the site across the plan period is overly ambitious and is unlikely to be achieved for a number of other reasons, as discussed below.

13.4 In this regard we would also note that the assessment below is based on the assumption that the purchaser(s) of the site will be supporting new homes on the site and the proposed allocation. It does not account for a scenario where there are other interests for the site which do not involve the delivery of residential development or the wish to pursue an allocation as currently proposed. We are not aware of any evidence which demonstrates that this scenario may not arise.

13.5 We also note that the existing ash processing activities at the site are also expected to continue beyond the Power Station's life span, until the existing deposits are fully depleted. It is not clear how long this process will take and what the implications are of this on the delivery of the site in terms of potential delays.

- 13.6 The Local Plan would also need to be adopted or close to adoption prior to the submission of a planning application. In this regard we note that the preparation of the Local Plan has not proceeded as fast as previously anticipated and it may be the case that the remaining stages slip beyond the anticipated timescales in the latest LDS (September 2021).
- 13.7 Before the completion of new homes is achieved on the Northern Parcel it will also be necessary to undertake the following:
- Disposal of the site to developers
 - Prepare the Development Framework for the site which will need to be approved prior to the submission of any planning applications
 - Secure Outline Planning Permission
 - Secure Reserved Matters
 - Discharge Planning Conditions
 - Commence Demolition and remediation
 - Install utilities
 - Undertake highways site access work and provide highways infrastructure within the site
- 13.8 Lichfields conducted extensive research in 2020 on what factors affect the build out rates of large-scale housing sites¹⁸. The conclusion of the research is backed up by examples of sites which have been delivered rather than unsubstantiated and unrealistic assumptions on delivery rates which are derived with the sole intention of exaggerating the claimed supply. One of the examples used as part of the evidence to underpin the Research is from a site in Warrington (New World, Latchford) - which lends further weight to Lichfields work.
- 13.9 The research sets out some very pertinent conclusions in relation to the time it takes large sites to come forward and commence delivering homes. For example:
- It takes on average 7 years from validation of first application to completion of first dwelling for sites with capacity of 1,500-1,999 dwellings:
 - It takes on average 3 years from the receipt of an outline decision notice to the completion of first dwelling completion on sites of 500+ dwellings:
 - Greenfield sites deliver on average 34% higher annual build-out rate compared with brownfield sites:
 - In terms of delivery rates for sites between 1,500 and 1,999 dwellings, the mean annual delivery is 120 dwellings per annum.

Disposal

- 13.10 The power station closed on 31 March 2020 and we understand that the site is currently in the early stages being marketed to potential developers and at the current time the sale of the site has yet to be agreed. The first stage of this process has therefore yet to be achieved and no developer (or developers) have been identified for the site.
- 13.11 Given the size of the site and the potential for multiple developers to be involved and the significant remediation and infrastructure requirements, the purchase is likely to be a complex and time consuming process and there is no clear indication at present as to when disposal will

¹⁸ Start to Finish Second Edition (February 2020)

take place. Any delays to the disposal of the site will have a subsequent impact upon the following stages of the delivery of the site. As the sale is market dictated, this could also have an impact upon the viability position on the site.

Development Framework

- 13.12 The submission date of any application will be determined by progress on the Development Framework and the approval of this document. Until the site has been disposed and a developer is in place, it is unlikely that any progress will be made on this document. In addition, the buyer of the site may not necessarily be a developer. They could be a venture capitalist for example, seeking a development partner, in which case the identification of a development partner could prolong the process prior to progress being made of the Development Framework. Not only that but it is unlikely that the Development Framework will be substantially progressed until after the site is allocated as the developer will want certainty of an allocation before committing substantial resources to its production and Council Officers will need to focus on the Local Plan before focusing on the Development Framework.
- 13.13 The Development Framework itself will be a complex document which needs to incorporate a significant amount of detail including, but not limited to, the following:
- A comprehensive spatial masterplan for the entire development site, based on the principles and requirements set out in this policy and reflecting site opportunities and constraints;
 - A comprehensive infrastructure delivery strategy for the development site with details on phasing, delivery triggers and delivery responsibilities; and
 - An allocation wide approach to infrastructure funding, including planning obligations.
- 13.14 If a number of developers are involved in the delivery of the site, the preparation of this document is likely to be even more complex as agreement will need to be reached on matters such as the location and delivery of supporting infrastructure and the triggers for this delivery.
- 13.15 In addition, Draft Policy MD3 requires that the document is subject to consultation with statutory consultees and the local community before being finalised, all of which will add further time to the preparation process. From our experience of being involved in the preparation of Development Frameworks/Masterplan documents post adoption of a Plan, they take considerable input from landowners and the Council and often take considerable amounts of time. The availability of resources at the Council to help deliver the document alongside other work is not clear. This has simply not been appropriately accounted for by Warrington Council.

Planning Application

- 13.16 A delivery programme for the site is provided in the Fiddlers Ferry Masterplan¹⁹. For Phase 1 of the scheme the following timescales are identified:
- | | |
|--|--------|
| • Outline Application / EIA | 2023 |
| • Reserved Matters Applications | 2024/5 |
| • Discharge of conditions / construction start | 2024/5 |
- 13.17 The Consortium considers that the timescales identified are wholly unrealistic given the current position on the disposal of the site and the length of time likely to be required for the

¹⁹ Fiddlers Ferry Masterplan (April 2021), page 5

preparation and finalisation of the Development Framework and the time required to address the various constraints prior to the submission of an application.

- 13.18 The timescales also suggest that the time between the submission of the outline and reserved matters applications could be as little as 12 months. We consider that the process of securing initial outline planning permission will take significantly longer than envisaged. As we have noted above, the site is subject to a number of constraints which will need to be resolved. The application determination process is therefore likely to be complex and could quite easily extend beyond usual timescales and this will have a knock-on effect on the remaining stages of the application process including the submission of reserved matters and discharge of conditions. Having reviewed similar applications on other power station sites²⁰, a period of 2 to 3 years is likely to be a more realistic timescale.
- 13.19 We also consider that the time between securing outline permission and the completion of first dwellings on site is likely to be significantly longer than anticipated. The timescales identified in the Masterplan would require outline planning permission to be secured by 2024/5. The Trajectory at Appendix 1 of the SVLP indicates the delivery of 35 homes in 2026 which would provide a 1-2-year timescale from outline permission to first dwelling delivery. Our research²¹ shows that for sites of this size, the average time from gaining outline permission to the delivery of the first dwelling is 3.1 years. However, we would also note that the planning to delivery periods for brownfield sites are on average longer than greenfield sites, so this time period would likely be greater for Fiddlers Ferry. We do not therefore consider that a 1 to 2-year timescale from outline permission to first dwelling delivery is realistic particularly in light of the conclusions of Lichfields research and the Council has not provided one example of where completion of units on a large site were achieved 1-2 years from the securing of an outline permission.
- 13.20 In addition, it is also important to note that outline planning permissions for strategic developments are not always obtained by the company that builds the houses, indeed master developers and other land promoters play a significant role in bringing forward large scale sites for housing development. As such, it may be the case that the land promoter or master developer will have to sell the site (or phases/parcels) to a housebuilder before the detailed planning application stage can commence, adding a step to the planning to delivery period and potentially adding additional time to the process.
- 13.21 In reality, the time period to reach first delivery is likely to extend significantly further into the plan period and this will have a resultant impact upon overall levels of delivery on the site.

Demolition and Remediation

- 13.22 We are also concerned that the timescales provided for demolition are too short given the size and complexity of the site. Demolition operations on the site have yet to commence and the Fiddlers Ferry Masterplan indicates the completion of demolition in 2024/25 following commencement in 2022. It is also not clear how the demolition will be financed and how such a substantive cost at the outset of a project could be accommodated without potentially securing significant public sector investment which has not been mentioned in the Council's evidence or secured.

²⁰ 9/2009/0341 – Hybrid Planning application including 2,239 dwellings at Drakelow Park, South Derbyshire (validated: 08/05/2009 with permission granted: 01/03/2012) & CH/19/201 - Outline Planning Application including 2,300 dwellings at Rugeley Power Station, Cannock Chase (validated 28/05/19 with permission granted 07/05/21)

²¹ Start to Finish Second Edition (February 2020)

- 13.23 The Consortium considers that this timeframe is unlikely to be achieved. The time required to demolish existing structures and clear the site is likely to be significant given the extent of buildings and associated infrastructure including:
- Eight cooling towers, massive turbine hall, substation and numerous buildings and equipment in the form of conveyors, pipework and operational and administrative buildings.
 - A coal storage area, or coal pad, with a rail loop, a number of rail sidings and other rail infrastructure.
 - Large lagoons related to the water-cooling infrastructure and ash deposition, and a series of hard and concrete surfaced tracks.
- 13.24 With regard to this matter, we would note the similar example of Rugeley Power Station in Staffordshire on which decommissioning and demolition commenced in June 2016 with completion of the demolition phase not expected to be achieved until the end of 2021 (a period of 4½ years). The site straddles the administrative boundary of Lichfield and Cannock Chase and was allocated as a Strategic Development Allocation for a mixed-use development in the Lichfield Local Plan. The Lichfield Local Plan was adopted in 2015 and it took 3 years before the Development Framework for the site was adopted. This is considered a realistic timeframe for the preparation, consultations and adoption of a Development Framework for large and complex strategic allocations.
- 13.25 Similarly, another example of the redevelopment of former power stations is the site at Ironbridge B in Telford/Shropshire. The decommissioning and demolition of Ironbridge B Power Station commenced in 2015 with demolition still taking place in September 2021 (a period of 6 years).
- 13.26 Whilst we appreciate that each site will have its own individual characteristics and issues which may affect demolition timescales, these examples provide a useful indication of how long the process can take in practice and the assumptions used by Warrington are wholly unjustified. The 2 to 3-year demolition period suggested for Fiddlers Ferry is much shorter than these timescales and we would therefore question whether it is realistic and likely to be achievable.
- 13.27 The Regeneration Vision for the site also recognises that remediation will be necessary and a number of potential sources of contamination are identified including several historic landfills and infilled areas of land, numerous bulk storage tanks used for the storage of a variety of substances, subsurface structures and records of asbestos containing materials on site. Further time will therefore be required to undertake the necessary remediation works to address these issues which is likely to have a subsequent impact upon the delivery of new homes.

Utilities and Infrastructure Provision

- 13.28 Before the completion of any homes is achieved, the infrastructure and utilities required to serve them will need to be in place. This will include the provision of appropriate access into the site plus any related spine roads required to serve the initial phases of development. As part of this process the existing access into the site will need to be upgraded. The form of this accesses has yet to be identified but given the capacity of traffic it will need to accommodate, it is likely to require significant modifications to the existing highway, particularly if a roundabout junction is required and this will take time to implement.
- 13.29 Not only that, there is a requirement to deliver a new 2FE onsite primary school and a location will need to be identified on the site for the school and consideration given to the timing of its

delivery. It is also questioned if, given the scale of the site, a secondary school would also be needed and if this has been considered. Similarly, there is likely to be increased pressure on health care provision and it is not clear if any discussions with the local Clinical Commissioning Group has been undertaken. From experience, negotiations on the delivery of such infrastructure can be a time-consuming process and it is not clear if this has been properly accounted for.

Build-out rates

- 13.30 There are a number of factors which can influence the speed at which individual sites build out and our research into the delivery of housing sites²² shows that large scale brownfield sites deliver at a slower rate than their greenfield equivalents: the average rate of build out for greenfield sites in our sample is 131 dpa compared to 98dpa for the equivalent brownfield. In this respect we note that significant parts of Fiddlers Ferry comprise brownfield land including all of the southern residential parcel and the western part of the northern residential parcel.
- 13.31 One theory regarding annual build-out rates is that the rate at which homes can be sold (the 'absorption rate') determines the build-out rate. This is likely to be driven by levels of market demand relative to supply for the product being supplied. Higher demand areas are indicated by a higher ratio of house prices to earnings i.e. less affordable. Whilst this is a broad-brush measure, the affordability ratio is a key metric in the assessment of local housing need under the Government's standard methodology. Our analysis shows that sites in areas of lower demand (i.e. more affordable) deliver on average less dwellings per annum. With regard to this matter, we note that the 2020 median affordability ratio for England is 7.84 and for Warrington it is 6.27, so homes in Warrington are more affordable than the national average.
- 13.32 The identified build out rates for Fiddlers Ferry in the Trajectory at Appendix 1 of the WUPSVLP are relatively conservative and we would suggest that, in the main, they are a realistic reflection of likely delivery rates given the nature of the site and the market demand in Warrington. However, for the reasons set out above, the Consortium considers that 570 dwellings within a 5 year period is ambitious and a maximum build rate of around 100dpa is likely be more realistic when the northern and southern parts are both on stream.

14.0 Conclusions

- 14.1 For the reasons set out in this note, the Consortium does not consider that the Fiddlers Ferry site will deliver as anticipated in the WUPSVLP 2021. We also have concerns with the loss of Green Belt land in this location and the lack of evidence to justify that this is the most appropriate site for Green Belt release. It is not clear why the Green Belt element of this site is required to come forward.
- 14.2 We consider on the basis of the evidence available that the Council has not met its duty to cooperate which is in conflict with the relevant provisions of Section 20 of the Planning and Compulsory Purchase Act 2004.
- 14.3 The SEA assesses the site to be deficient in a number of regards and we consider that these deficiencies have not been properly considered and the negative effects will be greater than assessed. This is likely due to the fact that the site has only been introduced as an allocation at this late stage and insufficient time has been available to compile all of the relevant evidence and fully consider the effects of the site. We do not consider that the site performs as strongly as has

²² Start to Finish Second Edition (February 2020)

been assessed in the SA and there are a number of issues which raise questions over its suitability for allocation, in particular with regard to accessibility which is poor and given the size of the site is likely to result in significant use of the private car, leading to congestion and air quality concerns.

- 14.4 The Consortium is also concerned that the biodiversity effects have not been properly assessed and may be worse. It is not clear how the Council can make assumptions on the significant impacts on biodiversity as it has not been confirmed at this stage what mitigation is to be provided.
- 14.5 As a more general point, it is not clear how the Council can make assumptions on the significant impacts on the environment when it is not clear at this stage how the site is to be remediated and what mitigation is required.
- 14.6 The assessment of the site is therefore considered to be deficient in a number of ways.
- 14.7 There is no certainty locally, as well as strategically, that the traffic likely to be generated by a redeveloped Fiddlers Ferry site can be suitably mitigated on the local and strategic road network. It is Eddisons view that in the context of the Framework [para 35] as the evidence supporting the Fiddlers Ferry site is not positively prepared, it is not justified as there is a lack of evidence provided in relation the mitigation of the impacts. It is not consistent with national policy as it fails to meet the requirements of para 104 [NPPF].
- 14.8 Due to the current lack of evidence currently available, it is clear that the Fiddlers Ferry draft allocation is contrary to national policy and at present there is no evidence that the site would not generate a severe residual cumulative impact on the road network, contrary to para 110 (bullet (d)) and 111 of the Framework.
- 14.9 Fiddlers Ferry is a large, complex brownfield site which is subject to a range of constraints that will need to be addressed at the pre-application, application and development stages. The Regeneration Vision for the site recognises that the site by nature is complex in terms of physical characteristics. Given the number and extent of these constraints, dealing with these matters is likely to result in an extensive application preparation and determination process and the Consortium considers that they will have a significant impact upon the delivery of new homes on the site and the areas which may be capable of coming forward for development.
- 14.10 The Green Belt in this area performs a vital strategic function in separating the towns of Warrington and Widnes. This function would be seriously eroded if this Green Belt was to be released and it would make a major contribution to the coalescence of the two settlements contrary to the Framework [§138].
- 14.11 For the reasons identified, we consider that the overall deliverable density on the site is likely to be lower than the 35dph minimum currently identified in Draft Policy MD3 particularly when ones factors in the need for appropriate landscape buffering and the need to deliver at least 65% of the market units as 3 & 4 bedroomed properties to accord with the provisions of the Housing Needs Assessment. The identified capacity of a minimum of 1,760 homes (or 1,310 homes over the plan period) is therefore unlikely to be achieved.
- 14.12 The Roger Hannah assessment demonstrates that the viability of the Fiddlers Ferry site is overstated and that the site is wholly unviable rather than marginal. As such, it is neither deliverable nor developable and its inclusion as a mixed-use allocation is therefore contrary to the Framework [§68]. The ability to deliver much needed affordable housing will be compromised.

- 14.13 The Consortium challenges the notion of the proposed completion of 35 dwellings within the first five years of the plan period. In addition, we consider that the overall delivery trajectory for the site across the plan period is overly ambitious and is unlikely to be achieved for a number of other reasons including:
- 1 The site is currently in the early stages being marketed to potential developers and at the current time the sale of the site has yet to be agreed. Given the size of the site and the potential for multiple developers to be involved, the purchase is likely to be a complex and time-consuming process and there is no clear indication at present as to when disposal will take place. Any delays to the disposal of the site will have a subsequent impact upon the following stages of the delivery of the site.
 - 2 The submission date of any application will be determined by progress on the Development Framework and the approval of this document. Until the site has been disposed and a developer is in place, it is unlikely that any progress will be made on this document. The Development Framework itself will be a complex document which needs to be subject to consultation with statutory consultees and the local community, and potential cross boundary issues before being approved. If a number of developers are involved in the delivery of the site, the preparation of this document is likely to be even more complex as agreement will need to be reached on matters such as the location and delivery of supporting infrastructure and the triggers for this delivery which will add further time to the preparation process.
 - 3 The Consortium considers that the timescales identified for application submission and the time between first permission and delivery of first homes are overly ambitious and unrealistic. It is likely that the process of securing initial outline planning permission will take significantly longer than envisaged as the site is subject to a number of constraints which will need to be resolved.
 - 4 It may be the case that the land promoter or master developer will have to sell the site (or phases/parcels) to a housebuilder before the detailed planning application stage can commence, adding a step to the planning to delivery period and potentially adding additional time to the process.
 - 5 The application determination process is therefore likely to be complex and could quite easily extend beyond usual timescales and this will have a knock-on effect on the remaining stages of the application process including the submission of reserved matters and discharge of conditions.
 - 6 In reality, the time period to reach first delivery is likely to extend significantly further into the plan period and this will have a resultant impact upon overall levels of delivery on the site.
 - 7 The delivery of first dwelling completions will also be affected by a number of other issues including the demolition and remediation of the site. The 2 to 3 year demolition period suggested for Fiddlers Ferry is much shorter than that experienced on other power station sites and we would therefore question whether it is realistic and likely to be achievable. Further time will also be required to undertake the necessary remediation works and the infrastructure and utilities required to serve the first homes.
 - 8 The build rates identified in the SVLP are ambitious in some cases and for the reasons identified may not be as high as currently anticipated.

- 14.14 The above evidence demonstrates that the Fiddlers Ferry site is unlikely to deliver as anticipated. The only way to address this matter and to ensure that much needed market and affordable housing is provided is to allocate other sites for new homes in the Local Plan.
- 14.15 As a best-case scenario, the Consortium consider that units will not be completed before **2033/34** in accordance with the following timeline:
- Adoption of the Local Plan – **2023**
 - Commencement of Development Framework upon adoption of the Plan. Significant levels of technical input required for such a complex site and the best-case scenario for adoption would be end **2025**
 - Planning Application(s) to follow in **2026** in accordance with the Development Framework
 - First completion 7 years post submission of the planning application. This accounts for extensive negotiation of the planning application including engagement with public consultees, signing of legal agreements, preparation and submission of reserved matters applications, discharging planning conditions, remediating the site, putting necessary infrastructure including access into the site before finally completing dwellings. – First completion expected **2033**
- 14.16 Although the realisation that the first completion is unlikely to be achieved before 2033, it is imperative that the Council does not seek to exaggerate the supply which can be achieved from this incredibly complex site. There are a multitude of examples from the across the North West for the delivery of strategic sites which take considerable time to commence delivery.
- 14.17 Applying realistic assumptions on likely lead in times for this site would result in **a shortfall in the Council’s proposed trajectory of 595 units** based on the assumptions they have used including the commencement of the delivery of units in years 2025/26. The Consortium is fervently of the opinion that the Council’s delivery assumptions are fundamentally wrong and are completely unrealistic and unachievable. No substantive evidence has been provided to justify their position given the requirement to prepare and adopt a Development Framework for a complex site in advance of the submission of a planning application will cause significant delays in progressing the site towards a permission.
- 14.18 Given the significant number and complexity of the issues raised in relation to the developability of this site, it is consider that the Council’s delivery trajectory is completely at odds with the reality of delivering complex strategic sites and the Council need to identify alternative sites to plug the gap in the supply trajectory. Not only that but the Consortium considers that the Council has not followed a logical approach in terms of identifying the most appropriate sites for release from the Green Belt and the loss of this proposed allocation would result in the erosion of the strategic gap between Warrington and Widnes.

15.0 Tests of Soundness

- 15.1 Taking the above issues into consideration, the Consortium considers that WUPSVLP 2021 Draft Policy MD3 – Fiddlers Ferry is unsound for the following reasons:
- 1 **It is not positively prepared:** Given the significant number and complexity of the issues raised in relation to the developability of this site, it is considered that the Council’s delivery trajectory is completely at odds with the reality of delivering complex strategic sites. The Council needs to identify alternative sites to plug the gap in the supply trajectory. Not only that but the Consortium considers that the Council has not followed a logical approach in

terms of identifying the most appropriate sites for release from the Green Belt and the loss of this proposed allocation would result in the erosion of the strategic gap between Warrington and Widnes. It is the consortiums view that the SA in relation to the assumptions made on Fiddlers Ferry is fundamentally flawed, results in an unsustainable approach to development, it is not sound and it is not legally compliant. The identification and delivery of a brownfield site which over exaggerates its impact in the SA should not surpass the allocation of other more sustainable greenfield releases where it is clearly not justified.

- 2 **It is not Justified:** The Consortium is fervently of the opinion that the Council's delivery assumptions are fundamentally wrong and are completely unrealistic and unachievable. No substantive evidence has been provided to justify their position and in any regard given the requirement to prepare and adopt a Development Framework for a complex site in advance of the submission of a planning application will cause significant delays in progressing the site towards a permission.
- 3 **It is not effective:** There is no evidence the Fiddlers Ferry site is deliverable over the plan period given, for example, the requirement for off site highway works that are unlikely to be provided on land within control of the site or the adopted highway.

The Consortium considers that if the site comes forward, it will not do so before 2033/34 based on the evidence and justification we have provided. This would result in a shortfall in the Council's proposed trajectory of 595 units based on the assumptions they have used including the commencement of the delivery of units in years 2025/26.

- 4 **It is not consistent with national policy:** An expressed intention of the Framework is to boost the supply of housing being delivered in the country in an effort to address the housing crisis. With this in mind, the Consortium is firmly of the opinion that the Warrington Council has exaggerated the claimed supply trajectory from the Fiddlers Ferry site and has not grounded their assumptions in reality. Little regard has been paid to the significant technical constraints associated with this site and the implications that they will have on timescales, viability and delivery of dwellings on the site. Warrington has consistently struggled with maintaining an adequate supply of land over the last few years. If the Plan progresses as drafted, the main consequence of failing to identify alternatives will result in further housing supply issues. The Consortium is strongly of the opinion that the failure to identify a sufficient level of housing allocations in the Plan will result in the WUPSVLP being found unsound at Examination or at the very least it will be subject to substantive changes at the Examination stage which will delay the formal adoption of the Plan.

The Fiddlers Ferry site is not deliverable. It does not currently benefit from planning permission and the timescales for achieving permission are likely to be considerable given that it is not currently in the ownership or control of a site promoter or developer who would bring it forward for residential development.

The site is not available now given the remediation and site clearance required and there are uncertainties over the timescales for this work. Given the extent of remediation / site clearance / infrastructure required and the complexities of delivering the site for other reasons such as biodiversity, the viability of the site is overstated and that the site is wholly unviable rather than marginal. As such, it is neither deliverable nor developable and its inclusion as a mixed-use allocation is therefore contrary to the Framework [§68]. The ability to deliver much needed affordable housing will be compromised.

The site does not offer a suitable location for development. The accessibility of the site is a significant issue and there does not appear to be any clear solution to addressing this matter. The site is poorly served by public transport and the assessment suggests that the provision of new services is likely to be unviable so it is difficult to see why any local bus service operators would choose to service the site. Given the site's isolated location and limited facilities proposed it will be heavily dependent on existing facilities elsewhere. It is also doubtful whether active travel infrastructure improvements would discourage use of the private car given the distance of the site from Central Warrington and other services such as a secondary school.

Given the amount of development proposed on the site and the distance from central Warrington this is a fundamental concern as this lack of accessibility may result in increased trips by private car and increases in congestion.

The redevelopment of the site would be contrary to the Framework in, for example, paragraphs 104, 110 and 111, and there is no evidence whatsoever to demonstrate that the residual cumulative impacts on the road network would not be 'severe'.

Therefore, there is no realistic prospect that housing will be delivered on the site within five years.

For the reasons identified in this note, the Consortium is of the view that the allocation of the Fiddlers Ferry Site conflicts with national policy in the Framework, including in respect of:

- a Paragraph 32 in relation to sustainability appraisal
- b Paragraphs 68 and 73 in relation to identifying land for homes
- c Paragraphs 104 to 106 and 110 to 111 in relation to promoting sustainable transport
- d Paragraphs 119 and 124 in relation to making the effective use of land and achieving appropriate densities
- e Paragraphs 137 to 143 in relation to protecting Green Belt land
- f Paragraphs 174 to 179 in relation to conserving and enhancing the natural environment
- g Paragraph 186 in relation to air quality

The Council cannot not therefore rely on the provision of new homes from this site and other sites are needed to address the considerable shortfall this creates.

Legal Compliance

15.2 We consider on the basis of the evidence available that the Council has not met its duty to cooperate which is in conflict with the relevant provisions of Section 20 of the Planning and Compulsory Purchase Act 2004.

15.3 In addition, the view of the consortium is that the SEA in relation to the assumptions made on Fiddlers Ferry is:

- 1 Fundamentally flawed as it results in an unsustainable approach to development.
- 2 It is not sound and it is not legally compliant as the assessment of the site is deficient. Sections 19 and 20 of the Planning and Compulsory Purchase Act 2004 require engagement of the Environmental Assessment of Plans and Programmes Regulations 2004. The

Consortium contends that the work that has been undertaken to meet the requirements of the Regulations is not adequate.

- 3 The identification and delivery of a brownfield site which has other fundamental technical delivery constraints should not surpass the allocation of other more sustainable greenfield releases where it is clearly not justified.

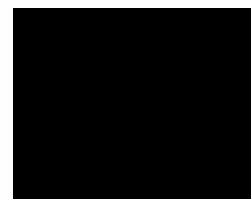
Recommended Change

15.4 To address the conflicts above and ensure the Local Plan is sound and legally compliant, it is considered that the Council:

- 1 Needs to provide additional evidence to justify the inclusion of the Fiddlers Ferry Site, including viability evidence.
- 2 Needs to re-assess the incorrect and underplayed impacts it will have in the SA and use this to inform the Local Plan strategy.
- 3 Provide robust evidence to counter the delivery concerns we have identified.
- 4 Reconsider the Green Belt evidence prepared for the site.
- 5 Should ensure that sufficient land is provided in alternative locations to account for any shortfall in provision at Fiddlers Ferry and ensure the housing requirement is met.

15.5 **THE PLAN SHOULD NOT BE SUBMITTED FOR EXAMINATION UNTIL ALL OF THIS INFORMATION HAS BEEN PROVIDED AND A FURTHER ROUND OF CONSULTATION SHOULD BE UNDERTAKEN TO ENSURE THE OPPORTUNITY IS PROVIDED TO MAKE COMMENTS ON ANY FURTHER CHANGES TO THE LOCAL PLAN AND ASSOCIATED EVIDENCE BASE.**

Annex 1
Eddisons Transport Note



WARRINGTON SUBMISSION VERSION LOCAL PLAN

TRANSPORT AND HIGHWAYS APPRAISAL TO LOCAL PLAN PROCESS – NOVEMBER 2021

Introduction

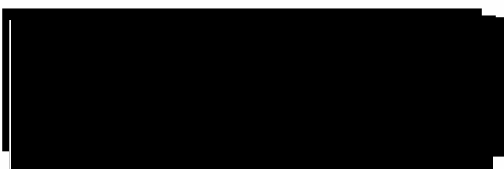
Eddisons have been instructed by a consortium of landowners and developers, including Story Homes, Wainhomes, Satnam Group, Metacre Limited and Ashall Property Limited, to advise on the pertinent highways issues contained with the latest documents submitted by Warrington Borough Council (WBC) as part of the emerging Warrington Local Plan process.

WBC is currently consulting on its updated Submission Version Local Plan (UPSVLP) which will guide development in the Borough to 2037. The UPSVLP has undergone a number of significant changes since the previous iteration of the Plan (2019) including a reduction in the number of houses required and a reduced plan period which in turn resulted in the removal of the number of sites required to be removed from the Green Belt. The draft allocations removed include: South West Urban Extension (1,600 homes), Phipps Lane, Burtonwood Village (160 homes), Massey Brook Lane, Lymm (60 homes). The Plan also seeks to move away from the Garden Suburb concept in South Warrington (4,200 homes previously), and instead now includes a new proposal for the South East Warrington Urban Extension with a reduced capacity of 2,400 new homes in the Plan period. The Plan seeks to introduce one significant site into the Plan at the Former Fiddlers Ferry Power Station following its closure as a power station in March 2020. The Plan anticipates the delivery of 1,310 dwellings within the Plan period with a further 450 dwellings beyond the Plan Period.

Considered Documents

This note will consider the content of the following documents and highlight any potential highways and transport implications with the current Local Plan documents:

- Transport Model Testing of the WBC Local Plan dated August 2021.
- Warrington Western Link Note by Mott Macdonald dated September 2021.



- Development Options and Site Assessment Technical Report dated September 2021.
- Warrington Local Plan Review - Sustainability Appraisal dated August 2021.

Assessment of Fiddlers Ferry Site

The Transport Model Testing of the WBC Local Plan dated August 2021 has included an assessment of the inclusion of the Fiddlers Ferry site within the modelling exercise. Paragraphs 9.6 to 9.11 of the report are summarised below:

'9.6 Fiddlers Ferry was not an allocated site in the previous modelling of the PSVLP 2019.

9.7 The development is proposing to deliver 1,310 homes through Green Belt release and 89.68Ha of employment land on a Brownfield site during the Plan Period with a further 450 homes beyond the Plan Period (a further 450 homes are projected to be delivered beyond the Plan period and these will be considered in the sensitivity analysis).

9.8 To provide access to the development, a number of assumptions were made in the modelling to facilitate the development traffic accessing the existing network and can be found in Chapter 5 above. However, no specific off site mitigation measures were included in the modelled network outside the development site itself.

9.9 Given the proximity of the development site to Halton, consideration has been given to the trip rate and trip distribution patterns and adjustments made to the matrix to reflect likely travel patterns.

9.10 In the immediate vicinity of the development, delays, flows and V/C ratios all increase as the development traffic is added to the existing local network, particularly along the A562 heading towards both Halton and Warrington. There are also increases on the local network heading to/from M62 J7 and the A557 Watkinson Way.

9.11 A number of junctions experience increases in delay, both within Warrington and Halton, which will need to be considered for improvement when further detailed work on the development site is undertaken to help mitigate the impacts of the development.'

Our view is that the results of that modelling on a network wide basis has not been presented in sufficient detail to establish any view as to how the network is likely operate with the Fiddlers Ferry site in the 2038 future assessment year.

In addition, the presentation of the modelling results do not allow any sort of comparison between the results of junction and network modelling from the previous Local Plan development strategy, ie with the SWUE, for example, and without the Fiddlers Ferry site, and the one being progressed now, ie without the SWUE, for example, and with the Fiddlers Ferry site.

This should be a critical thread of how the Local Plan strategy has evolved in recent years and should provide the evidence that the current strategy is more beneficial in transport terms than the previously proposed one, or at the very least acceptable in terms of, in this case, traffic impact on the local and strategic road network.

Moreover, there is no detailed traffic impact analysis contained within any of the Local Plan documents that would allow an assessment of the impact of the Fiddlers Ferry site and a confirmation that all of the mitigation required to ensure that the impact of the proposals was not 'severe', in the context of the Framework, could be delivered without requiring third party land.

It is clear from the August 2021 report, for example on the 'Analysis of Metric' information on Page 69, that the Fiddlers Ferry site will increase traffic flows along the A562 (see below).

Analysis of Metric:

Scenario 0 vs. Scenario 2

- Network change in Scenario 2 – A49 improvements and Parkside A&B, Highways England Concept Scheme at M56 J10; Highways England Concept Scheme at M6 J20 Lymm; and SEWUE & SEWEA enabling infrastructure. As there is additional highway infrastructure and capacity in Scenario 2, the PSVLP 2021 demand can choose to access the core network via alternative routes.
- For both AM and PM flows, there are increases in the immediate vicinity of the key development (both increases and decreases as result of re-routing effects):
- Increases in flow along the A562 (Fiddlers Ferry)
- Small decreases along the A49 corridor, increases along the A50 (SEWUE & SEWEA);
- Decreases through Appleton Thorn village as traffic is using the new SEWUE infrastructure; and
- Parkside Link and the new SEWUE link both show large increases as these are not present in Scenario 0 with traffic choosing to use these new links in Scenario 2. The Parkside link is causing large re-routing as the development demand is not explicitly being modelled in this assessment (all growth outside of the borough is based on NTEM), only the highway impact of a new link. The A49 improvements in the vicinity of M62 J9 are resulting in small decreases in flow on the Winwick link, Winwick roundabout and the A49.

The A562 is the main local highway route between Warrington and Widnes with a number of key junctions along its length, including the Fiddlers Ferry Gyratory in Widnes to the west, the 'Lane End' junction and the A57 roundabout junction towards Warrington town centre, to the east.

There are comments in the August 2021 report that suggest that mitigation can be provided on the local highway network that would be able to be provided to accommodate the traffic that would be generated by a redevelopment of the Fiddlers Ferry site.

This is confirmed in Paragraphs 9.10 and 9.11 (detailed above) with increases in flow along the A562, the A557 (in Widnes) and to and from the M62 Junction 7.

However, the August 2021 document provides no evidence of any agreement on the network modelling that has been carried out within the 2021 Local Plan documents with the neighbouring Halton Council and National Highways (NH), although 'engagement' with NH is mentioned, in paragraph 8.106. In addition, no mitigation has been agreed with either Halton Council or NH on their network to ensure adequate mitigation of the Fiddlers Ferry site.

In this context the Framework (2021) states at para 27 that in order to demonstrate effective and on-going joint working, strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency. Given the cross-boundary implications of Fiddlers Ferry on Halton and Warrington we would expect that this should be clearly set out and the relevant highways authority provides open transparent documentation of the assessment work and predicted impacts.

Given the strategic importance of these routes and the regional status of Junction 7 of the M62, there is absolutely no certainty whatsoever that the infrastructure required to accommodate the Fiddlers Ferry site can be achieved.

For example, the 'Lane End' junction, which is the A562/Liverpool Road junction, is a signalised arrangement that is inevitably going to be impacted by any redevelopment at the Fiddlers Ferry site. This junction is very constrained on all sides by existing development and any physical mitigation to improve the capacity of this junction is highly likely to require the acquisition of third party land and there is no certainty of this land being acquired.

In addition, the gyratory system at the A562/A557 (Fiddlers Ferry Junction) is a junction that serves as the approach route to the Mersey Gateway bridge to the south. As with the Lane End junction, this signalised intersection is constrained on all sides by existing development and third party land. Once again, any physical mitigation to improve the capacity of this junction is highly likely to require the acquisition of third party land.

As such, it is clear that there is no evidence that the traffic likely to be generated by a redeveloped Fiddlers Ferry site can be suitably mitigated on the local and strategic road network. It is Eddisons view that in the context of the Framework [para 35] as the evidence supporting the Fiddlers Ferry site is not positively prepared, it is not justified as there is a lack of evidence provided in relation the mitigation of the impacts. It is not consistent with national policy as it fails to meet the requirements of para 104.

Another issue with the current Local Plan allocations is the lack of alignment between the Transport Model Testing of the WBC Local Plan dated August 2021 document and the Development Options and Site Assessment Technical Report dated September 2021.

The latter document refers to 5 development options which are covered within the report. These are listed below with the various sites included within each one from the table in paragraph 4.5.12 of the document.

	Reg19b Option 1	Reg19b Option 2	Reg19b Option 3	Reg19b Option 4	Reg19b Option 5
Urban Constant	11,750	11,750	11,750	11,750	11,750
Outer Settlements	801	801	801	801	801
South East Warrington Urban Extension	2400	2400	2400	/	/
South Warrington Urban Extension	1700	/	/	1700	1700
Fiddlers Ferry	/	1300	1300	1300	1300
Thelwall Heys	/	/	310	310	/
Total	16,651	16251	16,561	15,861	15,551

Appendix 5 of the document subsequently includes a summary of the various options under a title of 'Options Assessment of Main Development Locations' on Page 84 of the document.

None of these options are referred at all in the Transport Model Testing document dated August 2021. As such, there is no comparison that can be made between the impacts of the various Local Plan options at all. This would include an appropriate cumulative assessment of the Local Plan options from the Development Options and Site Assessment Technical Report, which as far as we understand, is the most recent of the Local Plan evidence documents available.

Similarly, the 5 Options are also not referred to in the Warrington Western Link Note by Mott Macdonald dated September 2021.

Due to the current lack of evidence currently available, it is clear that the Fiddlers Ferry draft allocation is contrary to national policy and at present there is no evidence that the site would not generate a severe residual cumulative impact on the road network, contrary to para 110 (bullet (d)) and 111 of the Framework.

Sustainability

We have also considered the findings of the Appraisal of Urban Extension Options in Appendix G of the Sustainability Appraisal (SA) dated August 2021. We note that there are a number of issues with the Fiddlers Ferry site which raise questions over its suitability for allocation.

In particular, it is clear from the SA that the Fiddlers Ferry site performs poorly in terms of accessibility in comparison to the other growth areas considered and is assessed as having a 'minor negative' effect. With regard to this matter the SA states:

'It should be noted that only one bus route serves this area, making a regular service and capacity potential issues, with the scale of development being unlikely to increase the viability of new services being delivered (though employment growth on site could contribute towards viability alongside residential growth). The site is likely to deliver some limited onsite services such as a primary school and local shops and potential flexible health space. However, it is somewhat isolated in terms of accessibility to other shops and services, and secondary school, and as such may promote some car dependency. The scale of growth would be somewhat likely to deliver active travel infrastructural improvements, potentially making active travel more viable, however the site is over 5km from central Warrington and as such, some potential active travel potential journeys may instead be taken by private motor vehicle. Whilst the site could lead to some increases in congestion, especially at peak journey times (with the A562 and A57 most likely to be negatively affected), the size of the site increases the viability of infrastructure improvements intended to mitigate the effects of increases in traffic volumes. Overall, development in this location is predicted to lead to minor negative effects as accessibility would not be ideal in terms of walkability or public transport further afield.'

This 'minor negative effect' compares very poorly with the alternative sites which are also assessed within the 'accessibility' section of Appendix G, as follows:

- South-East Warrington Urban Extension – a combination of moderate positive effect and minor negative effect.
- Thelwall Heys – neutral effect.
- South West Urban Extension - minor positive effect.

The accessibility of the Fiddlers Ferry site is therefore a significant issue and there does not appear to be any clear solution or strategy contained in the plan or policy to address this matter. The site is poorly served by public transport and the assessment suggests that the provision of new services is likely to be unviable so it is difficult to see why any local bus service operators would choose to service the site.

Given the sites isolated location and limited facilities proposed it will be heavily dependent on existing facilities elsewhere which will inevitably increase the reliance of the use of the private car which is clearly contrary to current local and national planning policy. It is also doubtful whether active travel infrastructure improvements would discourage use of the private car given the distance of the site from Central Warrington and other services such as a secondary school.

Given the amount of development proposed on the site and the distance from central Warrington this is a fundamental concern as this lack of accessibility will result in increased trips by private car and may lead to increases in congestion which we have already highlighted is unlikely to be able to be suitably mitigated on land within the control of the Fiddlers Ferry site in any event.

We therefore consider that the site is likely to have a 'major negative' effect in terms of accessibility.

For the reasons set out above, we consider that the SA vastly underestimates the impact of the Fiddlers Ferry site and the scheme is likely to have a major negative effect upon sustainability.

In conclusion, the Fiddlers Ferry allocation does not meet the NPPF tests of soundness set out below from paragraph 35 of the Framework:

- *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence* – this has clearly not been carried out given the previous iteration of the Local Plan which provided a suitable range of housing allocations and the evidence to justify each of them, including the SWUE.
- *Effective – deliverable over the plan period* – there is no evidence the Fiddlers Ferry site is deliverable over the plan period given, for example, the requirement for off site highway works that are unlikely to be provided on land within control of the site or the adopted highway.
- *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies within this Framework* – this note has demonstrated that the redevelopment of the Fiddlers Ferry site is likely to be contrary to the Framework in, for example, paragraphs 104, 110 and 111, and there is no evidence whatsoever to demonstrate that the residual cumulative impacts on the road network would not be 'severe'.

Conclusions

In summary, as detailed in previous submissions made by the consortium, the WWL is fully supported.

The consortium, as previously confirmed, also supports the enhancement of the public transport network within the town with various major proposals such as the Mass Transit System, the new Warrington West station and the general improvement of existing facilities within the town to make travel by public transport more attractive.

However, it is clear from this note that on transport and accessibility grounds Fiddlers Ferry is not justified, effective, or consistent with National Policy and should not be presented as a sustainable alternative to the previous Local Plan strategy.

The Council are not justified in their statement on Page 91 of the Development Options and Site Assessment Technical Report dated September 2021 that appears to be a significant factor in the Council's decision to remove the SWUE from the Local Plan and promote the Fiddlers Ferry as an alternative.

For example, consideration of the 2019 and 2021 Local Plan documents clearly shows that:

- The Fiddlers Ferry site is likely to require major off site highway mitigation works which are unlikely to be deliverable on land owned by the site or on adopted highway.
- The Fiddlers Ferry site is poorly served by public transport and is not considered sustainable in transport terms.
- The Fiddlers Ferry site compares poorly in terms of accessibility to all of the other large residential allocation sites considered in the latest Local Plan evidence base.

The latest evidence documents submitted in support of the emerging plan do not provide any transport based justification for the inclusion of the potential redevelopment of the Fiddlers Ferry site.

There is no evidence that the current Local Plan strategy, which includes the Fiddlers Ferry site, is acceptable in transport terms and the Council have been inconsistent in their approach and evidence base. The Local Plan, as proposed, is therefore unsound when considering the Framework.

Appendix 4 Note D - Roger Hannah Viability Consultation Response

Viability Consultation Response – Warrington Local Plan

November 2021



RogerHannah

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I. Executive Summary

Executive Summary	
Instructions	<p>We have been instructed to provide a consultation response to the Warrington Local Plan Viability Assessment on behalf of the following parties:</p> <ul style="list-style-type: none"> • Ashall Property • Barratt David Wilson • Bloor Homes • Metacre Ltd • Satnam Group • Story Homes • Wainhomes <p>We have been instructed to provide a consultation response that focuses on the general typologies and conclusions set out in the LPVA, in addition to the new Fiddler's Ferry ("FF") site allocation for residential development that now forms part of the WLP.</p>
Conflicts of Interest	<p>C&W are appointed by the landowners of the Fiddlers Ferry site in a consultancy/advisory capacity. C&W go on to state that WBC confirmed that they did not consider this to be a conflict of interest. It is however not clear in what capacity C&W have been instructed by SSE as landowner to act in relation to the FF site.</p> <p>We therefore have concerns over the involvement of C&W in assessing the viability of the FF site and concluding that it is marginal/deliverable at the expense of other more deliverable sites. We believe that this is a conflict of interest and would recommend that the viability of the Fiddlers Ferry is assessed by an independent third party as part of the LPVA.</p>
Generic Typology Testing	<p>The LPVA concludes that most of the assumed typologies in lower value locations are unviable or marginal based on policy compliant level of affordable housing and other policy requirements. It also concludes that affordable housing is not deliverable in the town centre and that development with 0% affordable housing is marginal/undeliverable in the town centre.</p> <p>Our review of the appraisal assumptions shows that viability is likely to be overstated for the following reasons:</p> <ul style="list-style-type: none"> • Site density assumptions have been overstated in the Town Centre • GDV has been overestimated in the Town Centre and Inner Warrington typologies • The constructions costs in respect of site abnormal/extra over costs and energy requirements (Part L) in particular are underestimated across all typologies • Developer's profit is set at a marginal level on a blended basis across the private and affordable housing <p>We therefore believe the viability position across the borough for brownfield site development is likely to be worse than as assessed in the LPVA base testing.</p>
Sensitivity Analysis	<p>The LPVA goes on to sensitivity test the base results, concluding that the viability can be improved, and that reasonable weight can be attributed to the sensitivity testing. The issue with this is that the sensitivity analysis only makes positive changes to the appraisal inputs, which in turn of course generates more positive results.</p>

	<p>We have however found the sensitivity assumptions to be unrealistic as they are based on reducing costs assumptions which contradicts forecast and market data for the following reasons:</p> <ul style="list-style-type: none"> • All build cost forecast data demonstrates that build costs are increasing, with the LPVA itself reporting that the BCIS General Building Cost Index shows cost inflation of 3.56% from late 2019 to August 2021. • BCIS is forecasting cost increases of 21% from Q2 2021 to Q2 2026, due to material cost increases, building cost increases and longer supply times. • We would expect sales value increases to be offset by cost increases therefore rendering the results of a sensitivity test on this basis neutral, in that the base testing results are likely to largely remain the same when the cost increases go up by the same percentage as the sales value increases. • There is a need to consider the impact of increasing requirements on developers to comply with additional building regulations and increasing costs associated with Future Homes Standards. There are also additional reporting obligations being placed on developers in respect of carbon emissions. These factors are likely to lead to an increase in, rather than reduction in, contingencies and professional fees. • The reduced profit assumptions are marginal and below market expectations to offset development risks. There are numerous statements within the LPVA that emphasise the importance of assessing local plan level viability based on realistic rather than marginal assumptions. <p>We therefore do not consider the sensitivity testing to be plausible and disagree with the LPVA conclusion that “reasonable weight can be attributed to the sensitivity analyses”. This brings into question the wider conclusion that whilst the base testing results show full policy compliance cannot be delivered in the town centre and across the lower value locations, the sensitivity testing suggests that policy compliance is largely achievable in Warrington.</p> <p>National planning guidance sets out a need for sensitivity testing to be robust and consider what may happen over the life of the Plan. This means that testing scenarios should make positive and negative changes as deemed necessary. We would therefore recommend that the sensitivity testing is re-assessed based on more realistic assumptions.</p>
Additional Typology Testing	<p>The LPVA fails to test additional viable typologies to address the issues with the proposed brownfield typology development. We would therefore strongly recommend that that additional typology testing is undertaken to advise the Council what forms of development can ensure the delivery of policy compliance in respect of affordable housing and other planning policy requirements.</p> <p>We provide an example of a greenfield housing site typology of 150 units in a Suburb Mid Value location. This shows that this example typology can deliver 30% affordable housing, and policy compliance in respect of additional policy costs and Section 106 costs, including explicit compliance with the new Part L building regulation requirements.</p> <p>This demonstrates that additional typology testing needs to be undertaken for housing schemes in the higher value areas because this type of development can deliver policy compliance in terms of affordable housing, Section 106 contributions and additional policy costs. Additional testing in this regard would enable plan makers to identify where development, and in what form, should take place to meet policy requirements and achieve affordable housing delivery.</p>

Fiddlers Ferry

The LPVA concludes that FF is marginal based on an indicative scheme of 300 residential dwellings, just over 1.4m sqft of industrial development and c. 800 sq ft of retail development. It also concludes that the proposed commercial development at FF is unviable on a stand-alone basis, generating a “significant deficit against the BLV”.

Many of the appraisal assumptions for FF mirror the typology assumptions in the LPVA, except for the allowance of strategic infrastructure costs as set out in the IDP. The costs provided in the IDP for the whole site, Phase 1 and Phase 2 of the proposed FF development total £123,038,799. The LPVA only includes £90,174,299 against the proposed residential development at FF.

We have cross checked the included costs against the IDP costs and cannot verify the apportionment of the costs in the FF LPVA appraisal. It is not clear how the IDP costs are apportioned against the residential and commercial development in the context of the total cost of £123,038,799. It appears that there is no allowance in the LPVA FF appraisal for the commercial abnormal costs, which is a significant underestimation of cost based on the information in the IDP.

Based on our review of the IDP, it is possible to apportion these costs against the appropriate phases and uses on site. This is because the IDP sets out costs for the whole site (off-site works), Phase 1 and Phase 2 accordingly, splitting out the proposed Phase 1 costs associated with the residential and commercial development. We would therefore recommend that the costs are apportioned in this way in any appraisal of site viability.

Given that Phase 1 of the residential development is due to come forward first to fund the demolition/remediation costs for the power station and loss-making employment development, we believe it is prudent to appraise the viability of the site on this basis. We have therefore assumed that the proposed residential development associated with Phase 1 would come forward in three phases of 260-300 units.

This reflects the planned split of 860 units across Phase 1 as set out in the IDP. The commercial development is likely to follow this, on the basis that the land receipts associated with the residential development need to be used to fund the demolition/remediation and loss-making employment development. Phase 2 of the development would then follow this, assuming it is deliverable.

We have therefore appraised the residential phases within Phase 1 on an individual basis, with the results as follows:

Phase	Residual Land Value	Benchmark Land Value	Surplus/Deficit
Phase 1	-£5,804,160	£3,214,285	-£9,018,445
Phase 2	-£5,804,160	£3,214,285	-£9,018,445
Phase 3	-£5,033,250	£2,785,715	-£7,818,965

These appraisals are undertaken in isolation to assess the residual land value associated with the residential development on a standalone basis. This is because the land receipts associated with the residential development on the adjoining land to the power station are required to fund the £37,513,699 associated with the demolition/remediation of this site and the £32,100,000 of abnormal costs associated with the loss-making commercial development.

The residential phases do not produce a positive land value and are therefore wholly unviable. Not only does this not reach the required BLV in viability terms to justify policy compliant residential development on a standalone basis, but it does not generate any of the surplus required to fund the demolition/remediation of the power station site and the associated commercial development. This also demonstrates that the residential

	<p>development associated with Phase 2 would also be unviable, as our appraisals do not account for any of the additional costs associated with the bridge, network rail ransom and country park, which total £26,750,000.</p> <p>The residential development therefore cannot cross subsidise the demolition/remediation required to the power station or the loss-making commercial development. The residential development is also incapable of meeting planning policy and affordable housing requirements on a stand-alone basis because the residual land value of the phases is negative and therefore falls well below the required BLV for the site.</p> <p>In light of these findings, we can therefore conclude that the Fiddlers Ferry site is wholly unviable and not sustainable as a consequence.</p>
<p>Recommendations</p>	<p>Based on the above findings and conclusions, we do not consider that the LPVA in its current form meets the NPPF soundness requirements at paragraph 35. This is because it is not positively prepared, justified, or effective.</p> <p>The LPVA should advise the Council what types of development are viable and deliverable to be considered positively prepared. It should also be justified with reference to appropriate evidence, which is particularly the case in respect of build costs and the strategic infrastructure/abnormal costs associated with the Fiddlers Ferry site allocation. It is also relevant to the sensitivity analysis and associated conclusions that policy is largely deliverable because the tests are not based on realistic assumptions over the plan period. This is because they do not account for any build cost inflation or additional regulations associated with Future Homes Standards. It is therefore not effective as it does not demonstrate deliverability over the plan period.</p> <p>We therefore make the below recommendations in relation to the LPVA, which should be implemented to meet the NPPF soundness requirements.</p>
<p>Recommendations – Generic Typology Testing</p>	<ul style="list-style-type: none"> • The split of low, mid, and high value locations should be clearly shown on a map so that it is known what typology area a site is in at the application stage • The density assumptions of the Town Centre need to be reduced to a realistic level reflective of delivery in Warrington and other similar locations • The GDV in the Town Centre and Inner Warrington locations has been overestimated and should be re-assessed with reference to the comparable evidence and an appropriate level of new build premium • Base build costs should not be reduced by 5% in locations with revenues below £240 per sqft/£2,583 per sqm as there is no evidence to support this and we do not believe this level of value engineering would take place in Warrington • The costs associated with site abnormal/extra over costs and energy requirements (Part L Building Regulations) are too low and should be increased accordingly • The in-house cost database used to inform the cost assumptions should be made available in a suitable format to improve transparency and accountability in viability • The developer's return should be increased to a robust blended level of 20% on GDV for the purpose of plan wide viability assessment • National planning guidance sets out a need for sensitivity testing to be robust and consider what may happen over the life of the Plan. This analysis should therefore be based on realistic and forecast scenarios and should therefore exclude any reference to a reduction in base build costs, contingencies, or professional fees

	<ul style="list-style-type: none"> • The sensitivity testing should also refrain from testing marginal return requirements that are unrealistic • The conclusions of the sensitivity analysis, which states that most policy and affordable housing requirements can be met across the development typologies, should be re-assessed as they cannot be considered robust or realistic • Additional testing of viable site typologies should be undertaken to advise the Council what forms of development can ensure the delivery of policy compliance in respect of affordable housing and other policy requirements • An example of this is a 150 unit greenfield housing typology in a Suburb Mid Value location. This example typology can deliver 30% affordable housing, and policy compliance in respect of additional policy costs and Section 106 costs, including explicit compliance with the new Part L building regulation requirements.
<p>Recommendations – Fiddlers Ferry</p>	<ul style="list-style-type: none"> • The viability of this site allocation should be assessed by an independent third party, free from any conflicts of interest relating to the site • The standard cost assumption for residential development should be amended as per our recommendations in respect of site abnormal costs, energy requirements (Part L Building Regulations) and profit margin • The viability of the site should be re-assessed based on the known phasing/timescales and appropriate apportionment of the IDP costs in this respect • The viability should also be re-assessed with appropriate consideration of factors affecting development including flooding/drainage, ground conditions, highways, utilities, sustainability, because they will increase costs and reduce developable area, therefore impacting on site deliverability • The FF site should be found to be wholly unviable because the land values associated with the residential development in Phase I do not generate any of the surplus required to fund the demolition/remediation of the power station site and the associated loss-making commercial development. • The site should also be found to be wholly unviable because the residential development does not meet required BLV in viability terms and therefore cannot deliver affordable housing and other policy requirement on a standalone basis.

2. Introduction

2.1 Instructions

Roger Hannah has been instructed to provide a consultation response to the Warrington Borough Council Emerging Local Plan Viability Assessment (“LPVA”) on behalf of the following parties:

- Ashall Property
- Barratt David Wilson
- Bloor Homes
- Metacre Ltd
- Satnam Group
- Story Homes
- Wainhomes

The Warrington Local Plan (“WLP”) is due to set out a strategic policy framework for the borough up to 2038 and is currently the subject of a public consultation period until 15 November 2021. The initial WLP was published in March 2019 and the Council received 3,200 responses. These responses along with the impact of Covid-19 and the changes to the Government housing methodology has meant that a number of significant changes were made. These include a reduction in new housing from 945 per year to 816 per year over the plan period, the removal of 580 ha (1,433 acres) from the Green Belt, the removal or reduction of four allocated sites for residential development, the removal of 100 ha (247 acres) of employment land and the inclusion of the Fiddler’s Ferry site as a residential allocation.

The LPVA has been produced by Cushman & Wakefield (“C&W”) on behalf of Warrington Borough Council (“WBC”). This follows the Warrington Local Plan Viability Assessment produced by BNP Paribas (“BNP”) in March 2019 on behalf of WBC, in conjunction with the 2019 iteration of the WLP.

The focus of our response will be the LPVA produced by C&W, but we will reference the BNP document as and when it is deemed relevant. The LPVA sets out the general viability assumptions for assumed development typologies that should represent site supply across the plan area, as well as the strategic allocated sites.

We have been instructed to provide a consultation response that focuses on the general typologies and conclusions set out in the LPVA, in addition to the new Fiddler’s Ferry (“FF”) site allocation for residential development that now forms part of the WLP.

We have reviewed the LPVA assumptions and split our report into relevant sections based on the key assumptions and conclusions that we believe are worthy of further comment, providing our recommendations for amendments to the viability testing. We have then addressed the FF site assumptions and conclusions separately to this, in line with the requirement to test strategic sites on an individual basis.

It should be noted that our lack of comment on other sections and assumptions does not imply our agreement with them and we reserve the right to make further comments/representations at a later stage where relevant.

2.2 RICS Compliance

In accordance with the RICS Professional Statement, Financial viability in planning: conduct and reporting (2019), we can confirm the following:

- The persons involved in the preparation and review of this report are suitably qualified professionals that have extensive experience advising on viability matters across the region
- There are no conflicts of interest that affect our independent opinion being provided
- We have acted with objectivity, impartiality, without interference and with reference to all appropriate available sources of information

We can also confirm that we have had reference to and followed the best practice recommendations in the RICS Guidance Note, Assessing viability in planning under the National Planning Policy Framework 2019 for England (2021).

2.3 Reporting

The following suitably qualified professionals have produced and reviewed this report:

Author:


.....
Laura Mackay MRICS
Director

Reviewer:


.....
Tom Shepherd MRICS
Director

Date: 8 November 2021

3. Scope of Instructions

3.1 Conflicts of Interest

The LPVA states the following at Section 3.9:

“C&W’s London Office are appointed by SSE to act in a consultancy/advisory capacity in relation to the Fiddlers Ferry Power Station site which forms one of the proposed site allocations in the emerging Local Plan. As part of our update to the LPVA, we are required to review a submitted indicative FVA prepared by Aspinall Verdi acting on behalf of SSE.”

It appears Aspinall Verdi have advised in respect of the site viability for local plan purposes but it is not clear to what extent any of the ongoing C&W advice has affected this, and this advice does not appear in the local plan evidence base so is not available for public review. C&W have assessed the viability of the Fiddlers Ferry site in the LPVA and we have concerns that this could be a conflict of interest.

This could mean that FF is promoted as per WBC’s wider development aims, and as per the interests of the landowner as a C&W client, at the expense of the other parties who have an interest in previously allocated residential development sites that have been removed from the latest WLP, or parties with an interest in sites that have not been allocated at all in favour of the FF allocation.

We believe that this is a Party Conflict, which is defined in the RICS Professional Statement, Conflict of interest, as follows:

*“a situation in which the duty of an RICS member (working independently or within a non-regulated firm or within a regulated firm) or a regulated firm to act in the interests of a client or other party in a professional assignment conflicts with a duty owed to another client or party in relation to the same or a related professional assignment (a ‘**Party Conflict**’)”*

We therefore have concerns over the involvement of C&W in assessing the viability of the FF site and concluding that it is marginal/deliverable at the expense of other more deliverable sites. We believe that this is a conflict of interest and would recommend that the viability of the FF site is assessed by an independent third party free from any conflicts of interest as part of the LPVA.

4. Generic Typology Testing

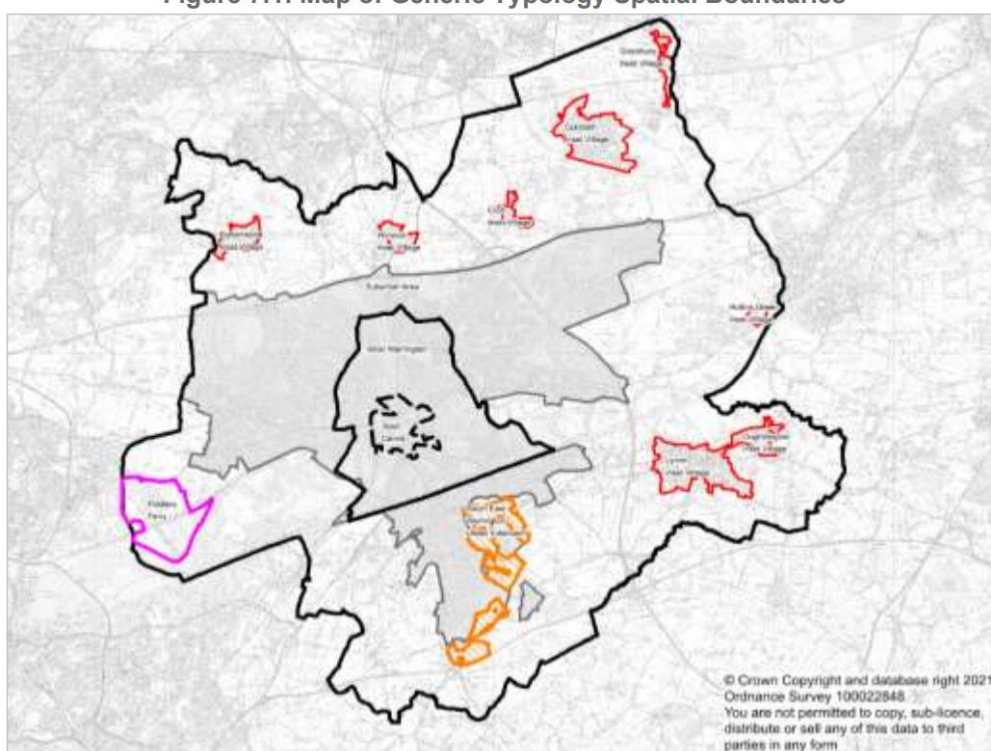
4.1 Development Typologies

In respect of the development typologies for the generic viability testing, the borough is split into the following areas:

- Town Centre
- Inner Warrington (North and South)
- Suburbs
- Settlements

These market areas and then tested based on ‘Low Value’, ‘Mid Value’ and ‘High Value’ typologies within each sub-area. A map is provided in the LPVA as follows:

Figure 7.1: Map of Generic Typology Spatial Boundaries



Source: Warrington Borough Council

Figure 1: LPVA Typology Map

This map is illegible and it is unclear where particular parts of the borough fall, and whether or not they are considered to be ‘Low Value’, ‘Mid Value’ and ‘High Value’ in each typology. We would request that additional detail is provided in this respect so it is clear where a particular site will fall in the typology testing at the application stage, and if the typology testing concludes whether or not the typology is unviable, marginal or viable.

In addition, we have reviewed the site density assumptions and the town centre schemes are based on the following densities:

Typology	Gross Area (ha)	Units	Units per ha
Town Centre 1	0.07	10	143
Town Centre 2	0.18	50	277
Town Centre 3	0.52	250	480

Figure 2: LPVA Town Centre Density Assumptions

We do not consider these to be realistic or reflective of likely delivery in Warrington town centre. These densities are more akin of city centre development in Manchester city centre where values can support the higher build costs associated with denser/taller schemes. This is not the case in Warrington town centre, and we would therefore expect reduced site densities as a result of this.

We also note that the typology testing is for brownfield sites only. This therefore does not consider any form of greenfield development that could come forward, or alternative viable typologies. We comment on this in more detail in Section 4.7 of this report.

4.2 Gross Development Value

4.2.1 Value Area Assumptions

The LPVA makes the following value assumptions across the typology areas:

Typology	Net Sales Value (£ psm)	Net Sales Value (£ psf)
Town Centre	£2,583	£240
Inner Warrington (North)	£2,476	£230
Inner Warrington (South)	£2,906	£270
Suburbs (High Value)	£3,283	£305
Suburbs (Mid Value)	£2,906	£270
Suburbs (Low Value)	£2,583	£240
Settlements (High Value)	£3,283	£305
Settlements (Mid Value)	£2,906	£270
Settlements (Low Value)	£2,583	£240

Figure 3: LPVA Value Area Assumptions

In terms of the value assumptions, those made in the Town Centre and Inner Warrington typologies are striking when compared to the comparable evidence that is collated. There is only one new build scheme that falls within these typology areas and that is Edgewater Park, which is a scheme of 32 apartments by Morris Homes. Reference has also been made to second hand sales to inform the value assumptions in these typologies. The evidence collated by C&W for apartments in these locations is summarised as follows:

Location	Evidence	Average Capital Value	Average Per Sqft	Average Per Sqm
Edgewater Park	New build	£129,375	£194	£2,085
Town Centre	Second hand	£89,433	£141	£1,519
Inner Warrington North	Second hand	£83,740	£148	£1,591
Inner Warrington South	Second hand	£112,725	£168	£1,809

Figure 4: C&W Apartment Evidence Summary

The second hand evidence for apartments therefore ranges from £141 - £168 per sq ft, increasing to £194 per sq ft across a comparable new build scheme. The LPVA itself comments on how 'any new build premium must be within reasonable parameters to ensure that the new build pricing does not breach affordability and is competitive within the local market.' We believe that the values in the Town Centre and Inner Warrington locations have been overstated on this basis.

The increases applied to the values compared to second hand values are as follows:

Location	Second Hand Evidence	Value Assumption	Increase
Town Centre	£141 per sqft	£240 per sqft	70.2%
Inner Warrington North	£148 per sqft	£230 per sqft	55.4%
Inner Warrington South	£168 per sqft	£270 per sqft	60.7%

Figure 5: Analysis of LPVA Value Assumptions

It is evident that the premiums applied compared the second hand values are quite significant, ranging from c. 55% – 70%. We believe this is likely to breach affordability in these locations and therefore does not represent competitive or realistic pricing. This is increasingly evident when we compare the second hand values and new build values for Inner Warrington South given that this data is available:

Location	Second Hand Evidence	New Build Evidence	Increase
Inner Warrington South	£168 per sqft	£194 per sqft	15.5%

Figure 6: Analysis of Evidence for New Build Premiums

This data suggests that an appropriate new build premium across apartments in this location is in the order of 15%. Whilst there will of course be differences across schemes, we would not expect new build premiums in the order of 55 – 70% as assumed in the LPVA.

Inner Warrington South has the benefit of new build sales evidence, but the schemes that form a basis for comparison without the need to apply any new build premium, is achieving values just under 40% below the value assumption made for this typology in the LPVA:

Location	New Build Evidence	Value Assumption	Increase
Inner Warrington South	£194 per sqft	£270 per sqft	39.2%

Figure 7: Analysis of LPVA Value Assumptions

No explanation for this significant deviation in evidence and valuation assumptions is provided in the LPVA, and we disagree with the valuation assumptions on this basis. We therefore recommend that the Town Centre and Inner Warrington typologies are re-assessed based on lower values that are more in line with the market evidence. An artificially high GDV is likely to lead to an overestimation of development viability in these locations.

4.2.2 Affordable Housing Values

The LPVA makes the following assumptions in respect of the affordable housing:

- Intermediate = 67.5% of Market Value
- Affordable Rent = 50% of Market Value

In general terms, we believe these assumptions are within a reasonable range, but we note that Registered Providers (“RPs”) do not typically reference a percentage of Market Value when valuing affordable housing stock. This can lead to a range of values being achieved across varying locations, and typically the percentage of Market Value achieved reduces in higher value locations and increases in lower value locations.

The LPVA recognises this to an extent by applying 60% of OMV to intermediate tenures and 45% of OMV to affordable rented tenures across the allocated sites in higher value locations. This is not replicated across the higher value typologies and we would recommend that the testing is consistent across the typologies and sites allocations in this respect.

There should also be recognition that the regulations around the delivery of affordable housing can change, as per the recent changes to the shared ownership tenures that reduce the percentage of a property that can be acquired to 10% and places maintenance obligations on the RP. This is likely to lead to a reduction in the values achieved for shared ownership housing and this may need to be reflected in a site-specific assessment of viability at the application stage.

4.3 Costs

The LPVA makes a number of cost assumptions in respect of standard build, abnormal development costs and policy related costs. We note that there has been no input from a suitably qualified cost consultant in respect of the cost assumptions adopted, which we believe contradicts best practice. The RICS Professional Statement financial viability in planning conduct and reporting, states the following:

“RICS members, whether on behalf of the applicant or LPA, must act as objective and impartial specialists to a professional standard when advising and providing information that can be relied on. In addition, they may be required to rely on highly specialist or technical inputs. This may include planning, legal and financial advice as well as technical development advice, such as build-cost estimates, ground condition surveys, engineering advice, etc.”

The RICS professional statement is mandatory and clearly sets out a need to rely on specialist advice, listing build-cost estimates as an example of this. The cost assumptions made by C&W should be supported by specialist QS advice.

There is reference to an internal C&W regional cost database in the LPVA:

7.273. For confidentiality reasons, we cannot disclose the specific details of each site. However, we can confirm that the sample includes 28 sites in different North West locations, across both greenfield and brownfield sites of differing sizes (28 units – 850 units) with the abnormal / extra over costs ranging from c. £7,000 to £52,000 per plot. The majority of sites (19 of 28) have abnormal / extra over costs equal to or below c. £24,000 per plot and 15 sites have abnormal / extra over costs equal to or below c. £20,000 per plot.

Whilst we accept that C&W will receive cost data from numerous sources for different purposes, we do not believe reference to an internal database that is not published is sufficient for local plan level viability testing. We would recommend that this data is made available and that additional specialist QS advice is provided as part of the assessment to ensure that the assumptions and associated testing are robust and credible.

We have therefore instructed Brookbanks, who are specialist project managers, engineers, and technical cost advisors to review the cost assumptions made. Their Technical Note is enclosed at **Appendix I**, with their comments and our comments summarised below:

Item	Cost	RH Comments
Base cost	<p>£98 - £110 per sqft/ £1,053 - £1,180 per sqm for estate housing.</p> <p>£120 - £147 per sq ft/ £1,295 - £1,585 per sqm for apartments.</p> <p>Reduced by 5% for locations with revenues below £240 per sqft/ £2,583 per sqm.</p> <p>Increased by 5% for locations with revenues above £285 per sqft/ £3,068 per sqm.</p>	<p>The adopted costs for both housing and apartments development appear low when compared to suggested benchmarking and recent BCIS data.</p> <p>The threshold of 75 housing units for the adoption of lower quartile costs is also below the level expected for cost savings to take place, which is typically across sites of 150 units or more.</p> <p>The changes made by 5% based on revenues are not justified by any data. We assume this is based on value engineering in lower value locations and increased specification requirements in higher value locations, but there is no evidence provided to justify why £240 per sq ft and £285 per sq ft are deemed as appropriate rates for these amendments.</p> <p>We would not expect to see a reduction in costs by 5% in locations where the GDV is at £230 per sqft/£2,476 per sqm, compared to £240 per sqft/£2,583 per sqm, as assumed in the LPVA. Value engineering can become a</p>

		<p>consideration, but not typically at this level, with much of the sales market in the region achieving values in this order. We would expect it to become a consideration in locations that are particularly low value in locations with revenues below £200 per sqft/£2,153 per sqm, based on the current market across the region. This is unlikely to affect housing sites in Warrington and should therefore not form part of the build cost assumptions in the LPVA.</p>
External works	15% for housing 10% for commercial	The allowance of 10% for apartments is too low, and should be increased to 12.5 – 15% to reflect typical site works.
Garages	Included in the above	<p>The LPVA assumes that garages are included in the base build cost. Base costs do not normally include garages and no evidence is provided to support that this would be the case, with BCIS explicit about the exclusion of garages in their costs.</p> <p>In our experience, a mix of single and double garages are typical across 20 – 40% of units on larger housing led schemes, and an average cost of between £7,500 - £10,000 per garage would be appropriate on this basis.</p>
Abnormal/extra over costs	<p>£15,000 per plot for housing</p> <p>£2,500 per plot for apartments</p>	<p>This allowance is made for items such as demolition, remediation, and ground preparation. C&W refer to an internal database of 28 regional sites, summarising the findings as follows:</p> <ul style="list-style-type: none"> • Costs ranged from c. £7,000 - £52,000 per plot • 19 of the 28 sites had costs equal to or below c. £24,000 per plot • 15 of the sites had costs equal to or below c. £20,000 per plot <p>No specific reference is made to the site data for apartments so it is unclear what, if any, data has been used to support this cost assumption.</p> <p>The short summary of the data that is provided does not help to identify where site abnormal costs are on a typical/general basis. It is not summarised in a way that helps to identify trends in the data or provided on a sanitised/confidential basis for wider review. This data is therefore considered insufficient for local plan purposes as it does not encourage transparency or accountability. Should it be relied upon, it should be published in an appropriate format that enables review.</p> <p>Based on the Brookbanks review and reference to our own professional experience, we would expect an abnormal cost allowance of £20,000 - £25,000 per plot to be more appropriate as a typology average.</p>

<p>Energy requirements</p>	<p>£2,250 per plot for 10% renewable/low carbon sources and Part L compliance</p> <p>6% of base costs to establish or connect to a decentralised energy network</p>	<p>These costs are intended to cover the following:</p> <ul style="list-style-type: none"> • 10% renewable/low carbon energy sources • Part L Building Regulations <p>The Part L requirements were confirmed earlier this year, with the LPVA referencing the most up to date government guidance that suggests costs of £3,130 - £4,847 per plot depending on the nature of the house type.</p> <p>Instead of relying on this information, C&W choose to reference an extract from a Local Plan Cost Review for North York Moors dating from 2018 (that pre-dates the most recent guidance above), which sets out a cost allowance of £2,250 per plot for 10% renewable energy sources.</p> <p>There is then no allowance for the known Part L requirements, which is justified on the basis it should be covered in the contingency allowance. A contingency is for potential unknown cost overruns and risk, not for known cost items. Part L is now a requirement and should therefore be explicitly allowed for at a cost of £4,847 per plot, as per the most up to date government guidance.</p> <p>This is corroborated by C&W at Section 4.19 of their Viability Technical Note for the Halton Borough Council EiP, dated April 2021, as follows:</p> <p><i>“The cost assumptions for complying with the uplifted Part L standards, as well as the other design and sustainability requirements which will be sought by the Council under Policy CS(R)19, must then be clearly stated and included in the WPVA, with the assumptions based on appropriate market evidence.”</i></p> <p>On this basis, we believe the energy requirement policy costs, assuming the minimum required level of compliance, should be increased to £7,000 per plot to allow for 10% renewable/low carbon energy sources and part L regulation compliance.</p> <p>The 6% for a decentralised energy network also appears to be low for a new system. Typical costs on this basis are more in the order of 10% of base build costs.</p>
<p>Future Homes Standards</p>	<p>No allowance</p>	<p>These standards are due to be amended in 2025. The exact nature of the impending changes are unknown at this stage but many developers are allowing an additional £8,000 per plot for zero gas requirements.</p>

		Given that these changes are expected and there is need to future proof local plan assumptions, these future costs should be considered in the LPVA, particularly in the sensitivity analysis.
Electric vehicle charging points (EVCPs)	Assumed to be included in site abnormal costs at £200 - £500 per plot	<p>The assumed cost of £200 - £500 per plot assumes the minimum cost for a basic charging point. As noted in the LPVA, the costs associated with EVCPs can vary substantially across sites, and typically requires additional on-site and off-site infrastructure works. These can include higher voltage cabling, air-source heat pumps, substations, as well as off-site substation upgrades and network improvements.</p> <p>These costs are difficult to quantify and can exceed hundreds of thousands dependent on site size and current service capacity. This scenario is untested in the LPVA and should be considered further.</p> <p>Should additional costs be identified in this regard we would also expect the LPVA to recognise that additional site-specific viability testing may be required at the application stage.</p>
Biodiversity net gain (BNG)	<p>£8,615 per acre for residential development</p> <p>£6,516 per acre for non-residential development</p>	<p>The LPVA states that this has been calculated as a per unit costs and added to the S.106 contributions. No details are however provided as to how this has been calculated and what the cost impact is on a per plot basis. We would therefore request that this is provided in the interests of transparency so that it can be reviewed and commented on if necessary.</p> <p>Should additional costs be identified for BNG we would also expect the LPVA to recognise that additional site-specific viability testing may be required at the application stage.</p>
Professional fees	7%	7% appears reasonable on an average basis for greenfield sites. The typology testing is however in relation to brownfield sites. The additional cost/infrastructure burden associated with these sites means that professional fees can rise to 8 – 12% for brownfield sites.
S.106 costs	£2,883 - £6,291 per plot across the typologies	Should additional Section 106 costs be identified we would expect the LPVA to recognise that additional site specific testing may be required at the application stage.

Figure 8: Review of LPVA Cost Assumptions

We believe that some of the construction costs have been underestimated, and that some of planning policy cost assumptions are too low. This results in viability being overstated because the costs that are likely to be incurred on a development are not fully accounted for.

It is also important to emphasise that many of the construction cost assumptions are provided without any supporting evidence and are based on an in-house database with no opportunity to comment on and review the data. This is not transparent and does not accord with providing the information that informs viability assessment, as per the PPG requirements and RICS best practice in respect of viability in planning.

We would therefore request that the supporting in-house cost data is published in a format that protects client confidentiality but encourages transparency and enables a full review of the evidence. This has been done elsewhere for Local Plan viability assessments, with Keppie Massie as an advisor to Local Councils publishing their in-house cost database following other EiPs in the region.

4.4 Infrastructure Delivery Plan

The LPVA refers to cost assumptions being based on the information in the IDP that has been produced by WBC. We note that the allocated sites have specific cost requirements associated with them, but there are also additional cost items with some significant funding gaps.

As an example, the Western Link Road is due to cost £220,000,000 with a funding gap of £77,500,000 identified. We note that the Council are listed as a funding source and we therefore assume that contributions could be sought from developers for schemes that are affected by the need to construct the link road. The LPVA does not appear to account for any of the £77.5m funding gap in the costs. We would therefore expect site specific viability assessments to be allowed should a development be expected to contribute towards this at the application stage as it is not considered in the LPVA.

4.5 Developer's Profit

4.5.1 Affordable Housing Profit

The LPVA assumes a profit margin of 7% of GDV across affordable housing. A relatively extensive evidence base is provided to support a margin of 20% of GDV across private housing, but this is not replicated for the affordable housing. The LPVA covers the profit margin adopted for affordable housing with just two sentences as follows:

7.313. We have adopted a reduced profit level of 7% of GDV for the affordable housing as there is less sales risk associated with the disposal of the affordable units which justifies a lower profit requirement. This is consistent with the developer's profit guidance in the PPGV which states that a lower profit may be more appropriate for affordable housing (Paragraph 018).

No supporting evidence is provided to support this assumption. We note there is reference to other Local Plans in the region to support the margin of 20% on GDV across the private housing. We have reviewed this evidence base, with reference to the viability assessments that were produced from 2018 onwards because these post-date the changes to the PPG in respect of viability. This evidence is as follows:

Local Authority	Author	Date	Market Housing Profit	Affordable Housing Profit
Rossendale Borough Council	Keppie Massie	Feb-21	20% of GDV	20% of GDV
Blackburn with Darwen	Keppie Massie	Jan-21	18% of GDV	18% of GDV
Blackpool Borough Council	LSH	Jul-20	18% of GDV	18% of GDV
Cheshire East Council	HDH	Jul-20	17.5% of GDV	17.5% of GDV
Pendle Borough Council	LSH	Dec-19	18% of GDV	18% of GDV
Halton Borough Council	HDH	May-19	17.5% of GDV	8% of GDV
St Helens Borough Council	Keppie Massie	Dec-18	20% of GDV	20% of GDV
Wirral Council	Keppie Massie	Nov-18	20% of GDV	20% of GDV
Liverpool City Council	Keppie Massie	Oct-18	20% of GDV	20% of GDV
Allerdale Borough Council	Keppie Massie	Sep-18	20% of GDV	20% of GDV

Figure 9: Local Plan Viability Assessment Profit Assumptions in the North West

These Local Plan Viability Assessments, which constitute market evidence according to the PPG, demonstrate that the same margin is being applied to the private and affordable housing for the purpose of local plan level viability testing. The guidance is clear that viability testing should be robust and not based on marginal assumptions, and we therefore disagree with the adoption of a 7% margin across affordable housing.

Only one of the examples in Figure 9 uses a lower margin against the affordable housing and we note that this is dated from 2019. The same author produced a viability assessment in July 2020 for Cheshire East Council and adopted a rate of 17.5% on GDV across both the private and affordable housing, also sensitivity testing a wider range of profit margins up to 20% on GDV across all housing.

We believe that the assumption adopted in this regard by C&W is based on the margins of viability, which is inappropriate for local plan viability testing, as emphasised on numerous occasions in the LPVA. We would therefore strongly recommend that that developer's return assumptions in the LPVA are revised to a realistic blended level to enable a robust review. Setting developer's return at an artificially low level serves to overstate plan wide viability, particularly when schemes will not progress with this level of return as they will be deemed too risky. The typology testing should therefore be based on a return of 20% on GDV across both the private and affordable housing.

It is also important to note that for larger scale sites, adopting a margin as a flat rate based on GDV can be too simplistic. The RICS guidance note (2021) states that consideration to the IRR may also be required because this measure of return is time-dependent and can be more relevant than a basic return on value or cost. This measure of profit should also be considered for the larger typologies and site allocations where the time value of capital is increasingly important to the viability of a development.

4.6 Appraisal Results

4.6.1 Base Testing Results

The typology testing is based on the following policy compliance:

- 20% affordable housing (50% affordable rent and 50% intermediate dwellings) in the Town Centre and Inner Warrington
- 30% affordable housing (67% affordable rent and 33% intermediate dwellings) elsewhere in the borough
- Accessibility standards – M4(2) on 100% of dwellings and M4(3) on 10% of dwellings
- Energy requirements
- Biodiversity net gain
- Proposed S.106 contributions

The LPVA results are as follows:

Generic Typologies – Base Testing Results

Typology	Benchmark Land Value	Residual Land Value	Surplus / Deficit
Town Centre 1	£90,809	-£51,904	-£142,713
Town Centre 2	£233,510	-£417,885	-£651,395
Town Centre 3	£674,583	-£7,132,800	-£7,807,383
Inner Warrington 1 North	£148,260	£22,329	-£125,931
Inner Warrington 2 North	£616,762	£140,677	-£476,084
Inner Warrington 3 North	£3,071,947	£1,924,445	-£1,147,503
Inner Warrington 1 South	£169,881	£134,256	-£35,625
Inner Warrington 2 South	£706,706	£1,018,859	£312,153
Inner Warrington 3 South	£3,519,940	£5,902,178	£2,382,238
Suburb 1 High Value	£224,861	£276,883	£52,022
Suburb 2 High Value	£1,084,151	£1,848,197	£764,046
Suburb 3 High Value	£5,420,756	£10,173,916	£4,753,160
Suburb 1 Mid Value	£190,267	£160,365	-£29,902
Suburb 2 Mid Value	£917,359	£1,199,964	£282,605
Suburb 3 Mid Value	£4,586,794	£7,219,955	£2,633,161
Suburb 1 Low Value	£166,051	-£9,236	-£175,287
Suburb 2 Low Value	£800,604	£538,721	-£261,883
Suburb 3 Low Value	£4,003,020	£4,203,799	£200,779
Settlement 1 High Value	£224,861	£328,945	£104,084
Settlement 2 High Value	£1,156,428	£1,933,431	£777,003
Settlement 1 Mid Value	£190,267	£199,662	£9,395
Settlement 2 Mid Value	£978,516	£1,264,073	£285,557
Settlement 1 Low Value	£166,051	£79,526	-£86,525
Settlement 2 Low Value	£853,978	£590,391	-£263,586
Town Centre 3 (BTR)	£674,583	-£8,785,128	-£9,459,711
Inner Warrington 3 (BTR)	£2,016,336	-£4,053,774	-£6,070,110

Figure 10: LPVA Base Testing Results

As shown by the figure above, there are more unviable typologies with 14 unviable typologies results and 2 marginal typology results, compared to 10 viable results. This shows that the following typologies are unviable or marginal:

- Town Centre 1
- Town Centre 2
- Inner Warrington 1 North
- Inner Warrington 2 North
- Inner Warrington 3 North
- Inner Warrington 1 South
- Suburb 1 Mid Value
- Suburb 1 Low Value
- Suburb 2 Low Value
- Suburb 3 Low Value
- Settlement 1 Mid Value
- Settlement 1 Low Value
- Settlement 2 Low Value
- Town Centre 3 (BTR)
- Inner Warrington 3 (BTR)

These typologies cannot deliver a policy compliant level of affordable housing, in addition to accessibility standards, energy requirements, BNG delivery and Section 106 contributions. It is worth noting that energy requirements are tested on a base position of £2,250 per plot, which we have found to be too low when considering the need for 10% renewable/low carbon energy sources and Part L building regulations. The costs on this basis should be £7,000 per plot, which will have a further negative impact on the viability base testing results.

The LPVA concludes that, “it is likely that the Council will need to be flexible in its application of policy requirements in these areas to ensure that development is not compromised and that site can still come forward in a viable and sustainable manner.”

Based on our commentary above, we also believe that viability is likely to be overstated as the GDV has been overestimated in some locations and some of the costs are underestimated across the typologies. We therefore believe the viability position across the borough for brownfield site development is likely to be worse than as assessed in the LPVA base testing.

4.6.2 Sensitivity Testing Results

The LPVA undertakes sensitivity testing and concludes that weight can be attributed to the results of this testing. We have however reviewed this testing in more detail and disagree with this conclusion.

The first set of sensitivity testing is based on increased sales values and reduced base build costs, with the results of this as follows:

Sensitivity Testing 1 and 2 – Increased Sales Values and Reduced Base Build Costs

Typology	Benchmark Land Value	Surplus/ Deficit (+5% Sales Values)	Surplus/ Deficit (+10% Sales Values)	Surplus / Deficit (-5% Build Cost)	Surplus / Deficit (-10% Build Cost)
Town Centre 1	£90,809	£-94,085	£-46,990	£-95,652	£-49,202
Town Centre 2	£233,510	£-413,618	£-181,080	£-419,461	£-188,192
Town Centre 3	£674,583	£-6,557,629	£-5,337,645	£-6,340,512	£-4,899,050
Inner Warrington 1 North	£148,260	£-58,838	£8,256	£-71,245	£-16,559
Inner Warrington 2 North	£616,762	£-149,095	£181,900	£-209,123	£58,575
Inner Warrington 3 North	£3,071,947	£339,089	£1,816,278	£111,421	£1,278,001
Inner Warrington 1 South	£169,881	£101,278	£180,030	£22,216	£80,057
Inner Warrington 2 South	£706,706	£698,551	£1,079,036	£593,035	£871,553
Inner Warrington 3 South	£3,519,940	£4,149,709	£5,831,639	£3,581,832	£4,745,264
Suburb 1 High Value	£224,861	£139,958	£227,894	£114,994	£177,965
Suburb 2 High Value	£1,084,151	£1,240,996	£1,720,197	£1,084,708	£1,404,167
Suburb 3 High Value	£5,420,756	£6,902,204	£9,108,538	£6,101,995	£7,443,401
Suburb 1 Mid Value	£190,267	£49,471	£128,843	£30,332	£90,565
Suburb 2 Mid Value	£917,359	£709,872	£1,137,136	£586,081	£887,524
Suburb 3 Mid Value	£4,586,794	£4,559,614	£6,497,461	£3,905,472	£5,190,037
Suburb 1 Low Value	£166,051	£-46,048	£24,493	£-118,205	£-61,257
Suburb 2 Low Value	£800,604	£117,521	£499,896	£29,347	£318,247

Suburb 3 Low Value	£4,003,020	£1,912,974	£3,679,935	£1,408,675	£2,635,365
Settlement 1 High Value	£224,861	£199,331	£294,579	£171,764	£239,443
Settlement 2 High Value	£1,156,428	£1,263,773	£1,755,510	£1,103,177	£1,430,226
Settlement 1 Mid Value	£190,267	£95,235	£181,076	£74,132	£138,869
Settlement 2 Mid Value	£978,516	£719,856	£1,160,590	£595,413	£904,292
Settlement 1 Low Value	£166,051	-£10,221	£66,082	-£25,319	£35,887
Settlement 2 Low Value	£853,978	£124,444	£514,864	£29,982	£327,936
Town Centre 3 (BTR)	£674,583	-£8,323,043	-£7,176,851	-£8,019,801	-£6,570,190
Inner Warrington 3 (BTR)	£2,016,336	-£12,669,665	-£3,535,633	-£4,826,435	-£3,582,759

Figure 11: LPVA Sensitivity Testing 1 and 2

These results show some improvement in viability across the typologies, but they are based on increased sales values and reduced build costs, so will only show an improvement in viability by virtue of the positive changes made to the appraisal assumptions. We believe that a sensitivity analysis should be based on realistic forecast assumptions, rather than assumed changes that only have a positive result on viability.

Whilst there is evidence to suggest sales value growth, there is no evidence to suggest build cost decreases. Indeed, the LPVA itself looks at value and cost changes from late 2019 to the date of the report in August 2021, reporting that the BCIS General Building Cost Index shows cost inflation of 3.56% over this period.

We have reviewed further BCIS evidence, with BCIS recently publishing five-year forecast data, which is enclosed at **Appendix 2** and concludes the following:

- “Tender prices are under pressure from the sharply rising materials prices and longer supply times that have resulted from Brexit and Covid-19”
- “Tender prices will rise by 21% over the forecast period (Q2 2021 to Q2 2026)”
- “Tender prices are expected to rise by 3.9% in Q2 2022 compared with the same quarter in 2021”
- “Tender prices are forecast to increase faster than input costs, rising by around 3% to 4% per annum”
- “The BCIS Materials Cost Index shows that materials prices rose by 4.6% in Q2 2021 compared with the previous quarter, and by 10% compared with a year earlier”
- “Material prices will rise by 15% over the forecast period (Q2 2021 to Q2 2026)”
- “Building costs will rise by 15% over the forecast period (Q2 2021 to Q2 2026)”

We also enclose various news articles from the mainstream press at **Appendix 3** that report cost increases in the sector, highlighting the prevalence of the issue. The current and forecast rises in cost therefore need to be considered in the sensitivity testing.

We also note the Future Homes Standards 2025 that will result in increased building requirements. Brookbanks are advising that the costs associated with zero gas requirements are currently in the order of £8,000 per plot. The LPVA makes no allowance for this in the sensitivity testing.

The results of the sensitivity testing in Figure 11 are therefore misleading, as they suggest that the viability of the typologies could be improved based on unrealistic assumptions that involve cost decreases. We would in fact expect sales value increases to be offset by cost increases therefore rendering the results of a sensitivity test on this basis neutral, in that the base testing results are likely to largely remain the same when the cost increases go up by the same percentage as the sales value increases.

The LPVA also reviews the impact of reduced contingency and professional fees as a sensitivity testing scenario, with the results as follows:

Sensitivity Testing 3 – Reduced Contingency (3%) and Professional Fees (5%)

Typology	Benchmark Land Value	Surplus / Deficit
Town Centre 1	£90,809	-£107,444
Town Centre 2	£233,510	-£473,479
Town Centre 3	£674,583	-£6,706,982
Inner Warrington 1 North	£148,260	-£80,668
Inner Warrington 2 North	£616,762	-£257,240
Inner Warrington 3 North	£3,071,947	-£169,945
Inner Warrington 1 South	£169,881	£11,892
Inner Warrington 2 South	£706,706	£542,535
Inner Warrington 3 South	£3,519,940	£3,366,138
Suburb 1 High Value	£224,861	£103,203
Suburb 2 High Value	£1,084,151	£1,028,222
Suburb 3 High Value	£5,420,756	£5,871,404
Suburb 1 Mid Value	£190,267	£19,324
Suburb 2 Mid Value	£917,359	£533,789
Suburb 3 Mid Value	£4,586,794	£3,692,933
Suburb 1 Low Value	£166,051	-£128,275
Suburb 2 Low Value	£800,604	-£18,797
Suburb 3 Low Value	£4,003,020	£1,213,897
Settlement 1 High Value	£224,861	£158,628
Settlement 2 High Value	£1,156,428	£1,044,781
Settlement 1 Mid Value	£190,267	£61,837
Settlement 2 Mid Value	£978,516	£541,298
Settlement 1 Low Value	£166,051	-£36,605
Settlement 2 Low Value	£853,978	-£16,916
Town Centre 3 (BTR)	£674,583	-£8,371,364
Inner Warrington 3 (BTR)	£2,016,336	-£5,065,341

Figure 12: LPVA Sensitivity Testing 3

Again, we do not consider the assumptions in this sensitivity test to be realistic. There is a need to consider the impact of increasing requirements on developers to comply with additional building regulations and increasing Future Homes Standards. There are also additional reporting obligations being placed on developers in respect of carbon emissions and the government desire to become carbon neutral due to the increasing prevalence of climate change issues. These factors are likely to lead to an increase in contingencies and professional fees. Again, we therefore do not believe that this sensitivity testing is realistic, resulting in misleading conclusions in respect of development viability.

The same is true for the final sensitivity testing scenario, which reduces developer’s profit to 18% of GDV across private housing. On a blended basis, this results in a blended margin in the order of 15.7% of GDV when allowing for 30% affordable housing as per policy requirements. This margin sits at the low end of the range of 15 – 20% of GDV as set out in the PPG and is therefore considered marginal. It is also considered marginal based on market requirements, with developers generally targeting a minimum margin of 20% on GDV on a blended basis.

There are also numerous statements within the LPVA that emphasise the importance of assessing local plan level viability based on realistic, rather than marginal assumptions. We do not believe that decreasing overall profit margin assumptions to a marginal level is a realistic reflection of how scheme viability could be improved in Warrington. Again, this highlights how the conclusions of the sensitivity testing are misleading, and that the sensitivity testing should be based on more realistic assumptions.

In summary, we disagree with the sensitivity testing assumptions and believe more robust testing should take place to reflect rising build costs and realistic profit margin requirements. The LPVA attaches weight to the sensitivity analyses to conclude that most of planning policy is deliverable, but we disagree with this contention.

4.6.3 Town Centre Testing

The results of the town centre sensitivity testing are as follows:

Typology	Benchmark Land Value	Residual Land Value	Surplus / Deficit
Scenario 1			
Town Centre 1	£90,809	£10,484	-£80,325
Town Centre 2	£233,510	-£102,452	-£335,961
Town Centre 3	£674,583	-£5,445,238	-£6,119,821
Scenario 2			
Town Centre 1	£90,809	£111,502	£20,693
Town Centre 2	£233,510	£398,564	£165,054
Town Centre 3	£674,583	-£2,876,480	-£3,551,063
Scenario 3			
Town Centre 1	£90,809	£146,262	£55,453
Town Centre 2	£233,510	£574,447	£340,938
Town Centre 3	£674,583	-£1,847,694	-£2,522,277

Figure 13: Town Centre Sensitivity Testing

The scenarios are as follows:

1. 0% affordable housing
2. 0% affordable housing, 10% increase across sales values
3. 0% affordable housing, 10% increase across sales values, contingency reduced to 3% and professional fees reduced to 5%

The LPVA therefore confirms that affordable housing is not deliverable in the town centre. We already believe the current GDV is overstated across these typologies and set out in the previous section why reducing costs is an unrealistic sensitivity testing scenario that does not reflect current market or forecast data.

We are therefore of the opinion that affordable housing is not deliverable in the town centre and that residential development is largely unviable in this location, as supported by current development activity in the town centre.

4.6.4 Testing Conclusions

To summarise, the viability in the base testing is likely to be overstated as the GDV has been overestimated in some locations and some of the costs are underestimated across the typologies. We therefore believe the viability position across the borough for brownfield site development is likely to be worse than as assessed in the LPVA base testing.

The LPVA then undertakes sensitivity testing based on the following:

- increased sales values and reduced build costs
- reduced contingencies and professional fees
- reduced developer's profit

These scenarios show improved viability across the typologies, but we note that are only based on positive changes that will of course show improved viability by virtue of this. We are however of the view that these

are not robust sensitivity assumptions because they do not consider forecast data and likely changes to developer requirements, for the following reasons:

- All build cost forecast data demonstrates that build costs are increasing, with the LPVA itself reporting that the BCIS General Building Cost Index shows cost inflation of 3.56% from late 2019 to August 2021.
- BCIS is forecasting cost increases of 21% from Q2 2021 to Q2 2026, due to material cost increases, building cost increases and longer supply times.
- We would expect sales value increases to be offset by cost increases therefore rendering the results of a sensitivity test on this basis neutral, in that the base testing results are likely to largely remain the same when the cost increases go up by the same percentage as the sales value increases.
- There is a need to consider the impact of increasing requirements on developers to comply with additional building regulations and increasing costs associated with Future Homes Standards. There are also additional reporting obligations being placed on developers in respect of carbon emissions. These factors are likely to lead to an increase in, rather than reduction in, contingencies and professional fees.
- The reduced profit assumptions are marginal and below market expectations to offset development risks. There are numerous statements within the LPVA that emphasise the importance of assessing local plan level viability based on realistic, rather than marginal assumptions.

We therefore do not consider the sensitivity testing to be plausible and disagree with the LPVA conclusion that “reasonable weight can be attributed to the sensitivity analyses”. This brings into question the wider conclusion that whilst the base testing results show full policy compliance cannot be delivered in the town centre and across the lower value locations, the sensitivity testing suggests that policy compliance is largely achievable in Warrington.

National planning guidance sets out a need for sensitivity testing to be robust and consider what may happen over the life of the Plan. This means that testing scenarios should make positive and negative changes as deemed necessary, which has been established at Appeal decisions in the region in both Trafford and Chorley. We would therefore recommend that the sensitivity testing is re-assessed based on more realistic assumptions.

4.7 Additional Typology Testing

The LPVA does not test what levels of affordable housing can be delivered in the unviable typologies, so it is unknown what levels of policy compliance are likely to be delivered. The conclusions in this regard are as follows:

- 9.14. The results suggest that affordable housing provision has a substantial impact on viability. In the lower value locations, it is possible that development could provide some affordable housing together with other policy requirements however it is unlikely that the policy target level will be met without compromising viability.

The PPG is clear in that:

“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.

It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies.” (Paragraph 002)

It also states the following:

“A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period . . . Plan makers

may then revise their proposed policy requirements to ensure that they are creating realistic, deliverable policies.” (Paragraph 004)

Planning guidance is clear that policies need to be viable and deliverable, and it is the role of a plan making viability assessments to assist in identifying viable and deliverable forms of development. Given that the LPVA base testing concludes that most of the development typologies cannot deliver a policy compliant level of affordable housing whilst meeting other policy requirements, more comprehensive typology testing should be undertaken to assist plan makers with the identification of viable development types and ensure that housing needs are met.

We would therefore recommend that additional and more robust typology testing is included within the LPVA to inform plan makers about what types of development are viable and what impact this would have on policy delivery. We would recommend additional testing is undertaken to assess what level of affordable housing can be delivered across the different typology areas, and to test more viable typologies to advise the Council on where development should be allowed to ensure the delivery of housing.

We have observed the following noteworthy shortcomings of the housing typology testing:

- There is no testing of sites sized between 50 – 250 dwellings
- There is no testing of any greenfield typologies
- There is no testing of additional viable typologies to offset the viability issues across the proposed brownfield site delivery

We are therefore of the view that the typology testing is not comprehensive enough. This is particularly relevant in the context of the conclusions of the LPVA which state that affordable housing has a significant impact on viability and is therefore unlikely to be delivered in the Town Centre and across all lower value typologies in Warrington.

There is a glaring omission in the LPVA typology testing when the conclusions in respect of affordable housing delivery are considered in more detail, with no alternative testing of viable typologies to assist plan makers in identifying where development should be allowed to ensure policy delivery.

We would therefore strongly recommend that that additional typology testing is undertaken to advise the Council what forms of development can ensure the delivery of policy compliance in respect of affordable housing and other planning policy requirements. We provide an example below of a greenfield housing site typology of 150 units in a Suburb Mid Value location. Our appraisal assumptions are summarised below:

Greenfield Suburb Mid Value – 150 units		Comments
Private units	105	As per policy requirements
Average Unit Size	1,175 sqft	As per LPVA assumptions
Private GDV	£270 per sqft	As per LPVA assumptions
Affordable units	45 (30%)	As per policy requirements
Average Unit Size	818 sq ft	As per LPVA assumptions
Affordable GDV	£150.59 per sqft	As per LPVA assumptions
Base build cost	£98 per sq ft	As per LPVA assumptions
External works	15% of base build	As per LPVA assumptions
Garages	£8,500 across 20% of units	As per recommended assumptions
Site abnormalities	£20,000 per plot	As per recommended assumptions
Accessibility standards	£270,165	As per LPVA assumptions
Energy requirements	£7,000 per plot	As per recommended assumptions
Contingency	5%	As per LPVA assumptions
Professional fees	7%	As per LPVA assumptions
S.106 costs	£6,291 per plot	As per LPVA assumptions (including BNG delivery costs)
Sales & marketing	3% of private GDV for marketing 0.5% of GDV for legal fees	As per LPVA assumptions

Finance rate	6%	As per LPVA assumptions
Profit on GDV	20%	As per recommended assumptions
Residual Land Value	£3,458,484	As per appraisal at Appendix 4
Benchmark Land Value	£3,477,500	As per LPVA assumptions
Surplus/Deficit	£19,016	Viable

Figure 14: Additional Typology Testing Assumptions and Results

The residual land value generated by this appraisal is £3,458,484. Based on the density assumptions set in the LPVA of 14 units per net acre, this reflects a net site area of 10.7 acres and a BLV of £3,477,500 based on the LPVA assumptions. This example typology is therefore viable and can deliver 30% affordable housing, and policy compliance in respect of additional policy costs and Section 106 costs, including explicit compliance with the new Part L building regulation requirements.

This appraisal demonstrates that additional typology testing needs to be undertaken for housing schemes in the higher value areas because this type of development can deliver policy compliance in terms of affordable housing, Section 106 contributions, and additional policy costs. Additional testing in this regard would enable plan makers to identify where development, and in what form, should take place to meet policy requirements and achieve affordable housing delivery.

5. Fiddlers Ferry

5.1 Overview

We have reviewed the assumptions made in respect of the viability testing of the Fiddlers Ferry (“FF”) site in detail given that it is a new allocation in the updated Local Plan.

The LPVA appraises the FF site based on an indicative scheme of 300 residential dwellings, just over 1.4m sqft of industrial development and c. 800 sq ft of retail development. It concludes that development at the FF site is marginal in viability terms as follows:

Site	Benchmark Land Value	Residual Land Value	Surplus/Deficit
Fiddlers Ferry	£14,764,500	£15,230,000	£465,500

Figure 15: LPVA FF Appraisal Results

This is based on the following policy compliance:

- 30% affordable housing
- Energy requirements – 10% renewable/low carbon energy sources only
- Biodiversity net gain
- Proposed S.106 contributions

The LPVA also concludes that the proposed commercial development at FF is unviable on a stand-alone basis, generating a “significant deficit against the BLV”.

5.2 Benchmark Land Value

The LPVA assumes a BLV of £150,000 per net acre across the FF site. This is on the basis that the site is greenfield but we note that it is in fact brownfield and we would expect the BLV to be assessed on this basis.

We note that the LPVA states that the BLV assumptions have:

“considered any changes to the policy requirements and the strategic infrastructure/abnormal cost impairments for each typology / allocation.

In summary, we believe that the proposed EUVs, landowner premiums and resultant BLVs are set at a level which balance the requirement to provide the landowner with the minimum incentive to release their site for development whilst also allowing a sufficient contribution to fully comply with national and local emerging policy requirements in accordance with the PPGV.”

The commentary in the BLV section is relatively clear that a balance is needed to account for the need to reflect abnormal costs, policy requirements and a minimum return to a landowner to ensure the release of land for development. There is therefore a ‘cut-off’ point at which a BLV reaches a minimum level on the basis that a landowner needs to reach a minimum level of return in order to release the land for development, as recognised by the commentary below:

- 7.428. It is worth reinforcing that the proposed BLVs reflect the implications of the abnormal and extra over development costs assumed in this study. For all typologies (generic and site-specific), should the abnormal and extra over development costs be higher than those provisionally assumed, the BLVs would need to flex to account for the higher site-specific cost impairment in accordance with the PPGV.
- 7.429. As previously mentioned, however, we consider that there is a land value tipping point beyond which the land value cannot reduce otherwise the landowner will not be sufficiently incentivised to release their site for development. In such circumstances, where a site is subject to particularly high abnormal costs combined with low sales values, and the land value tipping point is reached, it may be that policy requirements will need to flex to enable the site to come forward for development. This will be at the discretion of the Council as the decision-taker.

We agree with the statements in 7.429 above and note that this is particularly important in the case of the FF site. The BLV assumptions across the generic typologies range from £240,000 - £525,000 per net acre, reducing to £240,000 - £325,000 per net acre for housing led typologies. The BLV assumptions across the site allocations range from £150,000 - £350,000 per net acre, increasing to £250,000 - £350,000 per net acre when excluding the FF site.

Based on the LPVA BLV assumptions, £150,000 per net acre sits comfortably below the other BLV assumptions for sites that are less affected by site abnormal/infrastructure costs. We believe that this BLV assumption is therefore appropriate, but that it represents a 'cut-off' point whereby it cannot be expected to flex as otherwise the landowner will not be sufficiently incentivised to release their site for development. This is reflective of the market evidence set out in the LPVA whereby average net land values equate to £607,000 per net acre, and other BLV assumptions from Local Plan and CIL Viability Assessments in the region in which BLVs range from £150,000 - £650,000 per net acre.

The FF site is therefore being tested based on the absolute minimum BLV at a rate of £150,000 per net acre, and there is no flex in viability terms for this to be reduced should costs increase.

5.3 Standard Cost Assumptions

These are largely in line with the typology assumptions. Our comments in Section 4.3 apply here, with concerns over the allowances made for site abnormal/extra over costs and energy requirement costs (Part L Building Regulations). We also believe the profit margin should be increased to 20% of GDV on a blended basis to avoid marginal testing at the local plan making stage.

5.4 Section 106 Costs

These are set out in the Infrastructure Delivery Plan ("IDP") and reflect a total cost of £21,096,343. Based on a development of 1,760 residential dwellings this equates to £11,987 per plot. The LPVA assumes £9,714 per plot in the FF appraisal, which equates to a total of £17,096,640. It is not clear why there is a difference between the IDP and LPVA in this regard, or which of the S.106 figures are correct. We would recommend that this is clarified with WBC and that the appraisals are amended accordingly.

5.5 Site Specific Infrastructure/Abnormal Costs

These costs are based on the Infrastructure Delivery Plan ("IDP") as produced by WBC. C&W rely on these costs which are summarised as follows:

Phase	Item	Cost
Whole site	Various off-site highways works	£14,766,000
Whole site	Off-site utilities and drainage	£2,760,600
Phase 1	Demolition and remediation of power station	£37,513,699
Phase 1	Residential abnormals	Nothing provided on the basis that C&W make assumptions for site abnormal/extra over costs at £15,000 per unit
Phase 1	Commercial abnormals	£32,100,000
Phase 2	Utilities and drainage	£9,148,500
Phase 2	Residential abnormals	Nothing provided on the basis that C&W make assumptions for site abnormal/extra over costs at £15,000 per unit
Phase 2	Bridge over railway	£16,050,000
Phase 2	Network rail ransom	£5,350,000
Phase 2	Country Park	£5,350,000
Total:		£123,038,799

Figure 16: IDP FF Infrastructure/abnormal costs

The LPVA provides some commentary with regards to these costs, applying costs of £90,174,299 to the proposed residential development at FF. The LPVA then appraises FF based on an indicative scheme of 300 residential dwellings, just over 1.4m sqft of industrial development and c. 800 sq ft of retail development. This includes the following construction cost allowances:

CONSTRUCTION COSTS

Construction	ft ²	Build Rate ft ²	Cost	
Market Housing	246,750	98.00	24,181,500	
Aff Housing	73,650	98.00	7,217,700	
Commercial - Retail	917	103.56	94,965	
Commercial - Industrial	<u>1,406,131</u>	48.67	<u>68,436,396</u>	
Totals	1,727,448		99,930,560	99,930,560
Contingency		5.00%	5,928,977	
Statutory/LA			2,914,200	
				8,843,177
Other Construction				
Resi Ext. Works		15.00%	4,709,880	
Accessibility Standards			540,330	
Resi Energy Requirements	300 un	2,250.00 /un	675,000	
Resi Abnormal and Extra Over Costs	300 un	15,000.00 /un	4,500,000	
Comm Energy Requirements		2.00%	1,370,627	
Comm Ext. Works		10.00%	6,853,136	
Strategic Infra. and Abnormals			19,226,082	
BNG Delivery Costs			687,847	
Demolition			12,230,069	
				50,792,971
PROFESSIONAL FEES				
Prof Fees		7.00%	8,715,596	

Figure 17: Extract from LPVA FF Appraisal Summary

We have cross checked the included costs against the IDP costs and cannot verify the apportionment of the costs in the FF appraisal. It is not clear how the IDP costs are apportioned against the residential and commercial development in the context of the total cost of £123,038,799. It appears that there is no allowance in the LPVA FF appraisal for the commercial abnormal costs, which is a significant underestimation of cost based on the information in the IDP.

The costs in the IDP are split into costs for the whole site, Phase 1 (860 units) and Phase 2 (900 units). The whole site costs total £17,526,600 and are for off-site highways/utilities works which you would typically expect to be recovered through developer obligations and contributions. On a per plot basis against the proposed 1,760 residential dwellings this would equate to the following apportionment:

Phase	Item	Cost	Per Plot
Whole site	Various off-site highways works	£14,766,000	£8,390
Whole site	Off-site utilities and drainage	£2,760,600	£1,569

Figure 18: Expected Whole Site Cost Apportionment

There are no other explicit costs allowance in the IDP against the residential development, apart from reference to residential abnormal costs as assessed by C&W at £15,000 per plot in the typology testing. In respect of the whole site and Phase I costs associated with the residential development, this is the only remaining strategic/abnormal cost item above the cost assumptions already made in the LPVA for residential development. For clarity, this equates to the following abnormal cost burden against the residential development for Phase I based on the IDP and LPVA:

Item	Cost	Per Plot
Various off-site highways works	£14,766,000	£8,390
Off-site utilities and drainage	£2,760,600	£1,569
Site abnormal/extra over costs	£12,900,000	£15,000

Figure 19: Expected Abnormal Residential Cost Apportionment for Phase I

The remaining Phase I costs are then split into the remediation/demolition works to the power station, and commercial abnormal costs, which will affect the proposed employment development only:

Item	Cost
Demolition/remediation	£37,513,699
Commercial abnormal/extra over costs	£32,100,000
Total:	£69,613,699

Figure 20: Expected Abnormal Commercial Costs for Phase I

These cannot be as easily apportioned on a per plot/per sqft basis as the c. £37.5m of demolition/remediation costs will be incurred up front for this phase of the development and will therefore need to include as an upfront sum in any appraisal. The additional commercial abnormal/extra over costs would however be expected to be incurred throughout the development period and could therefore be apportioned on a per sqft basis across the proposed development.

It is therefore possible to apportion the relevant costs for Phase I to the proposed residential and commercial developments based on the information in the IDP, but the LPVA has not done this. Despite recognising that the residential and employment development in Phase I would come forward separately, the LPVA then goes to appraise the site on the basis of a mixed use development in one indicative phase.

The residential development would come forward in isolation and attract costs associated with the off-site highways/utilities works, as well as site abnormal/extra over costs associated with development. These costs can sensibly be apportioned on a per plot basis for the purpose of site allocation viability testing. The demolition/remediation costs and the commercial abnormal costs would then be incurred as part of the employment development. We would then expect Phase 2 to follow this.

The FF appraisals in the LPVA should therefore follow this logical progression of the phasing for Phase I, rather than appraise an indicative parcel with both residential and commercial development progressing at the same time.

5.6 Timescales/Phasing

As detailed above, we would expect any site appraisal for FF to follow the likely logical progression of development on site, rather than appraise an indicative parcel with both residential and commercial development progressing at the same time.

The LPVA does report that an appraisal for the full proposed Phase I has also been undertaken, which assumes the demolition/remediation costs are incurred over the first 3 years of the development, with the delivery of housing commencing earlier than this and the delivery of the employment commencing later following the

remediation of the power station land. The summary for this appraisal is not provided but the report advises that a surplus of c. £1,100,000 is generated.

The LPVA goes on to state that:

- 8.33. Based on the initial information provided by the Council and the site promotor, we also understand that the delivery of the second phase of development at Fiddlers Ferry may be more challenging from a viability perspective, particularly with the potential requirement for a new bridge across the railway and canal which could represent a substantial additional development cost. As such, any surplus generated from Phase 1 could potentially be utilised as cross-subsidy to contribute towards enabling the delivery of Phase 2.

This recognises that there are additional delivery and viability challenges associated with Phase 2 of the FF site, and that a surplus will need to be generated by Phase 1 to enable the future delivery of Phase 2. The LPVA also states:

- 8.36. Therefore, when removing the residential element from the appraisal, there is a substantial loss in revenue but a much lesser reduction in costs. Further, we understand that the residential can come forward on the adjoining greenfield land prior to the employment development whilst the demolition and remediation works are being carried out on the power station land, thus providing important revenue cash flow to assist in cross-subsiding the substantial demolition and remediation costs in the early period of development.

The LPVA also concludes that the proposed commercial development at the FF site is unviable on a stand-alone basis, generating a “*significant deficit against the BLV*”.

It is evident that the Phase 1 residential development needs to come forward to effectively fund the demolition/remediation costs associated with the power station land and resulting employment development that is planned to take place.

We therefore believe it is more prudent to assess the viability of Phase 1 with reference to the residential development land values that will be generated. This is because this element of Phase 1 needs to generate a surplus to fund the demolition/remediation of the power station, the associated loss-making commercial development and Phase 2.

We believe that it is likely that the proposed residential development associated with Phase 1 would come forward in three phases as follows:

- Phase 1 – residential development of 300 units
- Phase 2 – residential development of 300 units
- Phase 3 – residential development of 260 units

This reflects the planned split of 860 units across Phase 1 as set out in the IDP. The commercial development is likely to follow this, on the basis that the land receipts associated with the residential development can be used to fund the demolition/remediation of the power station itself. Phase 2 of the development would then follow this, assuming it is deliverable.

We would therefore recommend that the viability of the FF site is re-assessed on this basis, with reference to the residual value that would be generated by the residential development proposed in Phase 1. This would enable an assessment as to whether the land receipts are sufficient to deliver policy compliance, the demolition/remediation of the site, the associated employment development and Phase 2 of the planned scheme.

5.7 Technical Review

We have been provided with a report by Brookbanks, that comments on the technical information and IDP costs relating to FF in more detail. This is incorporated within the Technical Note provided at **Appendix I** and concludes the following:

Technical Constraints	Brookbanks Comments
Flooding and drainage	<p>The canal ownership is unknown and is a constraint for future drainage connections.</p> <p>Aside from the Brookbanks comments, this could also create another ransom position on site that either prevents development or increases the strategic abnormal costs.</p>
Ground conditions	<p>This is likely to be significant given the previous power station use on site. The IDP does not include any costs for the residential development on the basis C&W make cost allowances for site specific abnormal costs. The FF site is however listed as greenfield in the C&W LPVA, but this is misleading and there is likely to be high abnormal costs on site for the following reasons:</p> <ul style="list-style-type: none"> • The previous power station and chemical works site will impact on the adjoining land that is proposed to be allocated for residential use • The southern parcel is an 'area of disturbed land' which would require abnormal foundations and the bulk removal of contaminated material • The known underlying geology of the site is known to be associated with the need for piled foundations, which is likely to be required on all units across the southern parcel and some across the northern parcel
Highways	<p>These costs allowance appear reasonable save for the £267,500 allowed for the M62 junction 8 works based on discussions with National Highways on other sites where similar works are required.</p>
Utilities	<p>The Vyrnwy Aqueduct corridor is a significant obstacle between the southern residential parcel and the remainder of the site, as it could block the installation of services therefore preventing site delivery.</p> <p>Brookbanks have identified issues relating to hazardous installations including the gas main, fuel pipeline and other services. These are not identified on a plan in any Local Plan submissions and should be considered further as they impact on developable area and site delivery.</p> <p>There has also been no consideration of the private services running across the site, which will require mitigation and/or diversion. This would attract additional costs that are not allowed for in the IDP.</p>
Sustainability	<p>There does not appear to be any allowance made for the required substations and additional plot cabling likely to be required, which typically doubles on site costs for electrical infrastructure.</p> <p>There is also no allowance for Future Homes Standards costs, with costs of c. £8,000 per plot being allowed for zero gas requirements.</p>
Masterplanning	<p>The southern parcel is removed from the rest of the site. The separation caused by the canal and aqueduct will have a technical impact on delivery and result in a fragmented development.</p> <p>The site density assumptions in relation to gross/net developable area also appear to be undeliverable based on the known site constraints.</p>

Residential Abnormal Costs	The above factors would result in much higher site-specific abnormal costs associated with the residential development on site. As previously stated, we would expect site abnormal costs of £20,000 - £25,000 on a typical average basis. Given the flooding/drainage and ground conditions on site, a higher figure would be incurred at FF with Brookbanks advising that an indicate range of £35,000 - £50,000 per plot would be more reasonable at this stage.
Commercial Abnormal Costs	The remediation costs associated with the commercial development appear low when compared to another power station in the midlands that was half of the size and estimated to cost £21m to remediate.

Figure 21: Summary of Brookbanks Technical Review

In terms of other strategic infrastructure costs, some of the highways costs are underestimated. There are also unaccounted for cost items in relation to the private services and electrical infrastructure.

It is evident that if the site constraints were considered further and costed accordingly, the costs associated with the FF would increase, and the developable area would be reduced. This is particularly the case for the southern parcel which is earmarked for 900 homes. Whilst the site is already considered to be wholly unviable, we believe further exploration of the technical constraints and associated costs would only worsen the position in respect of viability and deliverability.

Notwithstanding this, there are also technical constraints that do not appear to have been considered that will impact on site deliverability. These include the ability of the site to drain, the presence of hazardous installations on site, the Vyrnwy Aqueduct corridor blocking the installation of services to the southern parcel, unrealistic site density assumptions and fragmented development issues.

5.8 Fiddlers Ferry Re-appraisal

Based on the above commentary, we believe it is appropriate to re-appraise the proposed residential development associated with Phase 1 of the FF site. This is because this land is required to come forward first on the adjoining land to the power station to fund the demolition/remediation required and enable the delivery of the employment development and Phase 2 of the scheme proposals.

We have therefore undertaken appraisals of each of the residential phases, based on the following assumptions:

Fiddlers Ferry Residential Phase 1		Comments
Private units	70%	As per policy requirements
Average Unit Size	1,175 sqft	As per LPVA assumptions
Private GDV	£255 per sqft	As per LPVA assumptions
Affordable units	30%	As per policy requirements
Average Unit Size	818 sq ft	As per LPVA assumptions
Affordable GDV	£142.37 per sqft	As per LPVA assumptions
Base build cost	£98 per sq ft	As per LPVA assumptions
Garages	£8,500 across 20% of units	As per recommended assumptions
External works	15% of base build	As per LPVA assumptions
Site abnormals	£40,000 per plot	As within the range of recommended assumptions
Accessibility standards	£609 per house on 100% of units £11,921 per house on 10% of units	As per LPVA assumptions
Energy requirements	£7,000 per plot	As per recommended assumptions
BNG delivery	£8,615 per acre	As per LPVA assumptions
Strategic off-site works for whole site	£8,390 per plot for off-site highways £1,569 per plot for off-site utilities	As per IDP costs for whole site (apportioned on a per plot basis)
Contingency	5%	As per LPVA assumptions
Professional fees	7%	As per LPVA assumptions
S.106 costs	£9,714 per plot	As per LPVA assumptions

Sales & marketing	3% of private GDV for marketing 0.5% of GDV for legal fees	As per LPVA assumptions
Finance rate	6%	As per LPVA assumptions
Profit on GDV	20%	As per recommended assumptions
Timescales	Pre-construction: 6 months Construction lead-in: 6 months Sales Period: 4 private sales per month Construction: phased to match rate of sale	As per LPVA assumptions for pre-construction and construction lead-in. Amended timescales sales and construction.

Figure 22: Recommended FF Phase I Residential Phases Assumptions

These assumptions mirror the LPVA appraisal assumptions where appropriate, amending the costs associated with site abnormal costs, energy requirements and profit as recommended in the previous sections of this report. We have also amended the timescales to reflect 4 sales per month, as we believe 6 sales per month is overly optimistic and unrealistic.

We have undertaken individual appraisals of each of the residential phases associated with Phase I as follows:

Phase	Residual Land Value	Benchmark Land Value	Surplus/Deficit
Phase 1	-£5,804,160	£3,214,285	-£9,018,445
Phase 2	-£5,804,160	£3,214,285	-£9,018,445
Phase 3	-£5,033,250	£2,785,715	-£7,818,965

Figure 23: FF Phase I Residential Appraisals

A copy of the appraisal summaries is enclosed at **Appendix 5**. These appraisals are undertaken in isolation to assess the residual land value associated with the residential development on a standalone basis. This is because the land receipts associated with the residential development on the adjoining land to the power station are required to fund the £37,513,699 associated with the demolition/remediation of this site and the £32,100,000 of abnormal costs associated with the commercial development.

The residential phases do not produce a positive land value and are therefore wholly unviable. Not only does this not reach the required BLV in viability terms to justify policy compliant residential development on a standalone basis, but it does not generate any of the surplus required to fund the demolition/remediation of the power station site and the associated commercial development. This also demonstrates that the residential development associated with Phase 2 would also be unviable, as our appraisals do not account for any of the additional costs associated with the bridge, network rail ransom and country park, which total £26,750,000.

The residential development therefore cannot cross subsidise the demolition/remediation required to the power station or the loss-making commercial development. The residential development is also incapable of meeting planning policy and affordable housing requirements on a stand-alone basis because the residual land value of the phases is negative and therefore falls well below the required BLV for the site.

In addition, there are other technical site constraints that have not been appropriately considered. These issues relate to flooding/drainage, ground conditions, highways, utilities, sustainability, and site density and result in additional costs and less residential development on site. Should these factors be accounted for in an appraisal, the viability position would only worsen.

In light of these findings, we can therefore conclude that the Fiddlers Ferry site is wholly unviable and not sustainable as consequence.

5.9 Summary

The LPVA concludes that FF is marginal based on an indicative scheme of 300 residential dwellings, just over 1.4m sqft of industrial development and c. 800 sq ft of retail development. It also concludes that the proposed commercial development at FF is unviable on a stand-alone basis, generating a “significant deficit against the BLV”.

Many of the appraisal assumptions for FF mirror the typology assumptions, except for the allowance of strategic infrastructure costs as set out in the IDP. The IDP costs on this basis for the whole site, Phase 1 and Phase 2 of the proposed FF development total £123,038,799. The LPVA only includes £90,174,299 against the proposed residential development at FF.

We have cross checked the included costs against the IDP costs and cannot verify the apportionment of the costs in the FF appraisal. It is not clear how the IDP costs are apportioned against the residential and commercial development in the context of the total cost of £123,038,799. It appears that there is no allowance in the LPVA FF appraisal for the commercial abnormal costs, which is a significant underestimation of cost based on the information in the IDP.

Based on our review of the IDP, it is possible to apportion these costs against the appropriate phases and uses on site. This is because the IDP sets out costs for the whole site (off-site works), Phase 1 and Phase 2 accordingly, splitting out the proposed Phase 1 costs associated with the residential and commercial development. We would therefore recommend that the costs are apportioned in this way in any appraisal of site viability.

Given that Phase 1 of the residential development is due to come forward first to fund the demolition/remediation costs for the power station and loss-making employment development, we believe it is prudent to appraise the viability of the site on this basis. We have therefore assumed that the proposed residential development associated with Phase 1 would come forward in three phases as follows:

- Phase 1 – residential development of 300 units
- Phase 2 – residential development of 300 units
- Phase 3 – residential development of 260 units

This reflects the planned split of 860 units across Phase 1 as set out in the IDP. The commercial development is likely to follow this, on the basis that the land receipts associated with the residential development can be used to fund the demolition/remediation of the power station itself. Phase 2 of the development would then follow this, assuming it is deliverable.

We have appraised the residential phases within Phase 1 on an individual basis, with the results as follows:

Phase	Residual Land Value	Benchmark Land Value	Surplus/Deficit
Phase 1	-£5,804,160	£3,214,285	-£9,018,445
Phase 2	-£5,804,160	£3,214,285	-£9,018,445
Phase 3	-£5,033,250	£2,785,715	-£7,818,965

Figure 24: FF Phase 1 Residential Appraisal Results

These appraisals are undertaken in isolation to assess the residual land value associated with the residential development on a standalone basis. This is because the land receipts associated with the residential development on the adjoining land to the power station are required to fund the £37,513,699 associated with the demolition/remediation of this site and the £32,100,000 of abnormal costs associated with the commercial development.

The residential phases do not produce a positive land value and are therefore wholly unviable. Not only does this not reach the required BLV in viability terms to justify policy compliant residential development on a stand-alone basis, but it does not generate any of the surplus required to fund the demolition/remediation of the power station site and the associated commercial development. This also demonstrates that the residential development associated with Phase 2 would also be unviable, as our appraisals do not account for any of the additional costs associated with the bridge, network rail ransom and country park, which total £26,750,000.

The residential development therefore cannot cross subsidise the demolition/remediation required to the power station or the loss-making commercial development. The residential development is also incapable of meeting planning policy and affordable housing requirements on a stand-alone basis because the residual land value of the phases is negative and therefore falls well below the required BLV for the site.

In addition, there are other technical site constraints that have not been appropriately considered. These issues relate to flooding/drainage, ground conditions, highways, utilities, sustainability, and site density and result in additional costs and less residential development on site. Should these factors be accounted for in an appraisal, the viability position would only worsen.

In light of these findings, we can therefore conclude that the Fiddlers Ferry site is wholly unviable.

6. Conclusions and Recommendations

6.1 Scope of Instructions

C&W are appointed by the landowners of the FF site in a consultancy/advisory capacity. C&W go on to state that WBC confirmed that they did not consider this to be a conflict of interest. It is however not clear in what capacity C&W have been instructed by SSE as the landowner to act in relation to the FF site.

We therefore have concerns over the involvement of C&W in assessing the viability of the FF site and concluding that it is marginal/deliverable at the expense of other more deliverable sites. We believe that this is a conflict of interest and would recommend that the viability of the FF site is assessed by an independent third party free from any conflicts of interest as part of the LPVA.

6.2 Generic Typology Testing

We have undertaken a review of the LPVA generic typology assumptions and conclusions. The main concern we have is that the LPVA concludes that most of the typologies in lower value locations are unviable or marginal based on policy compliant level of affordable housing and other policy requirements. It also concludes that affordable housing is not deliverable in the town centre, demonstrating that even development with 0% affordable housing is marginal/undeliverable.

Our review of the appraisal assumptions shows that viability across the base testing is likely to be overstated as the GDV has been overestimated in some locations and some of the costs are underestimated across the typologies. We therefore believe the viability position across the borough for brownfield site development is likely to be worse than as assessed in the LPVA base testing.

The LPVA then goes on to sensitivity test the base results, concluding that the viability can be improved, and that reasonable weight can be attributed to the sensitivity testing. The issue with this is that the sensitivity analysis only makes positive changes to the appraisal inputs, which in turn only generates more positive results. We have however found the sensitivity assumptions to be unrealistic as they are based on reducing costs assumptions which contradicts forecast and market data for the following reasons:

- All build cost forecast data demonstrates that build costs are increasing, with the LPVA itself reporting that the BCIS General Building Cost Index shows cost inflation of 3.56% from late 2019 to August 2021.
- BCIS is forecasting cost increases of 21% from Q2 2021 to Q2 2026, due to material cost increases, building cost increases and longer supply times.
- We would expect sales value increases to be offset by cost increases therefore rendering the results of a sensitivity test on this basis neutral, in that the base testing results are likely to largely remain the same when the cost increases go up by the same percentage as the sales value increases.
- There is a need to consider the impact of increasing requirements on developers to comply with additional building regulations and increasing costs associated with Future Homes Standards. There are also additional reporting obligations being placed on developers in respect of carbon emissions. These factors are likely to lead to an increase in, rather than reduction in, contingencies and professional fees.
- The reduced profit assumptions are marginal and below market expectations to offset development risks. There are numerous statements within the LPVA that emphasise the importance of assessing local plan level viability based on realistic, rather than marginal assumptions.

We therefore do not consider the sensitivity testing to be plausible and disagree with the LPVA conclusion that *“reasonable weight can be attributed to the sensitivity analyses”*. This brings into question the wider conclusion that whilst the base testing results show full policy compliance cannot be delivered in the town centre and across the lower value locations, the sensitivity testing suggests that policy compliance is largely achievable in Warrington.

National planning guidance sets out a need for sensitivity testing to be robust and consider what may happen over the life of the Plan. This means that testing scenarios should make positive and negative changes as deemed necessary, which has been established at Appeal decisions in the region in both Trafford and Chorley. We would therefore recommend that the sensitivity testing is re-assessed based on more realistic assumptions.

The LPVA then fails to test additional viable typologies to address the issues with the proposed brownfield typology development. We would therefore strongly recommend that that additional typology testing is undertaken to advise the Council what forms of development can ensure the delivery of policy compliance in respect of affordable housing and other planning policy requirements.

We provide an example of a greenfield housing site typology of 150 units in a Suburb Mid Value location. This shows that this example typology can deliver 30% affordable housing, and policy compliance in respect of additional policy costs and Section 106 costs, including explicit compliance with the new Part L building regulation requirements.

This demonstrates that additional typology testing needs to be undertaken for housing schemes in the higher value areas because this type of development can deliver policy compliance in terms of affordable housing, Section 106 contributions and additional policy costs. Additional testing in this regard would enable plan makers to identify where development, and in what form, should take place to meet policy requirements and achieve affordable housing delivery.

6.3 Fiddlers Ferry

The LPVA concludes that FF is marginal based on an indicative scheme of 300 residential dwellings, just over 1.4m sqft of industrial development and c. 800 sq ft of retail development. It also concludes that the proposed commercial development at FF is unviable on a stand-alone basis, generating a “*significant deficit against the BLV*”.

Many of the appraisal assumptions for FF mirror the typology assumptions in the LPVA, except for the allowance of strategic infrastructure costs as set out in the IDP. The costs provided in the IDP for the whole site, Phase 1 and Phase 2 of the proposed FF development total £123,038,799. The LPVA only includes £90,174,299 against the proposed residential development at FF.

We have cross checked the included costs against the IDP costs and cannot verify the apportionment of the costs in the FF LPVA appraisal. It is not clear how the IDP costs are apportioned against the residential and commercial development in the context of the total cost of £123,038,799. It appears that there is no allowance in the LPVA FF appraisal for the commercial abnormal costs, which is a significant underestimation of cost based on the information in the IDP.

Based on our review of the IDP, it is possible to apportion these costs against the appropriate phases and uses on site. This is because the IDP sets out costs for the whole site (off-site works), Phase 1 and Phase 2 accordingly, splitting out the proposed Phase 1 costs associated with the residential and commercial development. We would therefore recommend that the costs are apportioned in this way in any appraisal of site viability.

Given that Phase 1 of the residential development is due to come forward first to fund the demolition/remediation costs for the power station and loss-making employment development, we believe it is prudent to appraise the viability of the site on this basis. We have therefore assumed that the proposed residential development associated with Phase 1 would come forward in three phases as follows:

- Phase 1 – residential development of 300 units
- Phase 2 – residential development of 300 units
- Phase 3 – residential development of 260 units

This reflects the planned split of 860 units across Phase 1 as set out in the IDP. The commercial development is likely to follow this, on the basis that the land receipts associated with the residential development need to be used to fund the demolition/remediation and loss-making employment development. Phase 2 of the development would then follow this, assuming it is deliverable.

We have therefore appraised the residential phases within Phase I on an individual basis, with the results as follows:

Phase	Residual Land Value	Benchmark Land Value	Surplus/Deficit
Phase 1	-£5,804,160	£3,214,285	-£9,018,445
Phase 2	-£5,804,160	£3,214,285	-£9,018,445
Phase 3	-£5,033,250	£2,785,715	-£7,818,965

Figure 25: FF Phase I Residential Appraisal Results

These appraisals are undertaken in isolation to assess the residual land value associated with the residential development on a standalone basis. This is because the land receipts associated with the residential development on the adjoining land to the power station are required to fund the £37,513,699 associated with the demolition/remediation of this site and the £32,100,000 of abnormal costs associated with the commercial development.

The residential phases do not produce a positive land value and are therefore wholly unviable. Not only does this not reach the required BLV in viability terms to justify policy compliant residential development on a standalone basis, but it does not generate any of the surplus required to fund the demolition/remediation of the power station site and the associated commercial development. This also demonstrates that the residential development associated with Phase 2 would also be unviable, as our appraisals do not account for any of the additional costs associated with the bridge, network rail ransom and country park, which total £26,750,000.

The residential development therefore cannot cross subsidise the demolition/remediation required to the power station or the loss-making commercial development. The residential development is also incapable of meeting planning policy and affordable housing requirements on a standalone basis because the residual land value of the phases is negative and therefore falls well below the required BLV for the site.

In addition, there are other technical site constraints that have not been appropriately considered. These issues relate to flooding/drainage, ground conditions, highways, utilities, sustainability, and site density, and result in additional costs and less residential development on site. Should these factors be accounted for in an appraisal, the viability position would only worsen.

In light of these findings, we can therefore conclude that the Fiddlers Ferry site is wholly unviable and not sustainable as a consequence.

6.4 Recommendations

Based on the above findings and conclusions, we do not consider that the LPVA in its current form meets the NPPF soundness requirements at paragraph 35. This is because it is not positively prepared, justified or effective.

The LPVA should advise in respect of what types of development are viable and deliverable to be considered positively prepared. It should also be justified with reference to appropriate evidence, which is particularly the case in respect of build costs, energy requirement costs and the strategic infrastructure/abnormal costs associated with the Fiddlers Ferry site allocation. It is also relevant to the sensitivity analysis and associated conclusions that policy is largely deliverable as the tests are not based on realistic assumptions over the plan period, as they do not account for any build cost inflation or additional regulations associated with Future Homes Standards. It is therefore not effective as it does not demonstrate deliverability over the plan period.

We therefore make the following recommendations in relation to the LPVA, which should be implemented in order to meet the NPPF soundness requirements:

Recommendations	
Typologies	<ul style="list-style-type: none"> The split of low, mid, and high value locations should be clearly shown on a map so that it is known what typology area a site is in at the application stage The density assumptions of the Town Centre need to be reduced to a realistic level reflective of delivery in Warrington and other similar locations
Gross Development Value	<ul style="list-style-type: none"> The GDV in the Town Centre and Inner Warrington locations has been overestimated and should be re-assessed with reference to the comparable evidence and an appropriate level of new build premium
Construction Costs	<ul style="list-style-type: none"> Base build costs should not be reduced by 5% in locations with revenues below £240 per sqft/£2,583 per sqm as there is no evidence to support this and we do not believe this level of value engineering would take place in Warrington The costs associated with site abnormal/extra over costs and energy requirements (Part L Building Regulations) are too low and should be increased accordingly The in-house cost database used to inform the cost assumptions should be made available in a suitable format to improve transparency and accountability in viability
Developer's Return	<ul style="list-style-type: none"> The developer's return should be increased to a robust blended level of 20% on GDV for the purpose of plan wide viability assessment
Sensitivity Analysis	<ul style="list-style-type: none"> National planning guidance sets out a need for sensitivity testing to be robust and consider what may happen over the life of the Plan. This analysis should therefore be based on realistic and forecast scenarios and should therefore exclude any reference to a reduction in base build costs, contingencies, or professional fees The sensitivity testing should also refrain from testing marginal return requirements that are unrealistic The conclusions of the sensitivity analysis, which states that most policy and affordable housing requirements can be met across the development typologies, should be re-assessed as they cannot be considered robust or realistic
Additional Typology Testing	<ul style="list-style-type: none"> Additional testing of viable site typologies should be undertaken to advise the Council what forms of development can ensure the delivery of policy compliance in respect of affordable housing and other policy requirements An example of this is a 150 unit greenfield housing typology in a Suburb Mid Value location. This example typology can deliver 30% affordable housing, and policy compliance in respect of additional policy costs and Section 106 costs, including explicit compliance with the new Part L building regulation requirements.
Fiddlers Ferry	<ul style="list-style-type: none"> The viability of this site allocation should be assessed by an independent third party, free from any conflicts of interest relating to the site The standard cost assumption for residential development should be amended as per our recommendations in respect of site abnormal costs, energy requirements (Part L Building Regulations) and profit margin The viability of the site should be re-assessed based on the known phasing/timescales and appropriate apportionment of the IDP costs in this respect The viability should also be re-assessed with appropriate consideration of factors affecting development including flooding/drainage, ground conditions, highways, utilities, sustainability, and site density as believe there are issues

	<p>that are unaccounted for in respect of cost and developable area that will affect site delivery</p> <ul style="list-style-type: none">• The FF site should be found to be wholly unviable because the land values associated with the residential development in Phase 1 do not generate any of the surplus required to fund the demolition/remediation of the power station site and the associated commercial development.• The site should also be found to be wholly unviable because the residential development does not meet required BLV in viability terms and therefore cannot deliver affordable housing and other policy requirement on a standalone basis.
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Table 26: Roger Hannah Recommendations

Appendix I. Brookbanks Technical Note

10855 Warrington

Technical Note: Costs and Technical Review – Rev 2

10th November 2021

1 Introduction

Background

- 1.1 Brookbanks are a multi-disciplinary firm of Consulting Engineers, Cost Managers and Master Developers.
- 1.2 Long term multi-phase projects of this scale are our specialism and our team's unique experience from concept through to project completion, we believe, makes us uniquely placed to advise on development costs and technical solutions. In our company, our commercial team sit alongside specialist technical, engineering, development, and productions teams to ensure we are always able to offer real-world solutions and costs for major development schemes.
- 1.3 We can robustly back up our expertise through numerous completed and live significant scale, urban extension, and new town developments across the Country, including Bishop Stortford North, Airfield Farm, Cranbrook, and many others. We kick started the strategy for implementation and led the ongoing delivery of the Sherford new town close to Plymouth. We are proud to be the Master Developer on this project and are directly responsible for the delivery of all physical and social infrastructure for this scheme of 5,500 homes.
- 1.4 We have been requested by Laura MacKay of Roger Hannah to review the Cushman & Wakefield "Warrington Local Borough Council Emerging Local Plan Viability Assessment Report dated August 2021 and in particular the cost base upon which the viability review has been based.
- 1.5 We have also been asked to review the Infrastructure Delivery Plan (IDP), and in particular the elements pertaining to the Fiddlers Ferry site, which has been undertaken by my colleague David Nottingham, and this is included in this report.

2 Cost base commentary

2.1 Any paragraph and table references are specific to the Cushman and Wakefield Report as noted above.

Summary of Appraisal Assumptions

2.2 Base Build Costs

- At para 7.187 the C&W states the construction assumptions for base build costs, specifically we do not agree with the 1050mm deep foundations and beam and block floor slabs being 'standard'.
- In our experience, and in accordance with NHBC guidance we take standard foundations to be 900mm deep, in addition we have treated beam and block floors to be an abnormal which are driven usually by the need to ventilate the underfloor void or to accommodate potential clay heave, both of which are abnormal impacts.
- Also, at 7.187(h) C&W note that standard includes garages, this is contra to the usual BCIS approach.
- The C&W report at page 8 and from para 7.189 includes a range of assumed Build costs, which vary depending on the assumed revenues as well as the usual development size and are split between houses and flats.
- At the mid-point of the Assumed Revenues of £2,594-£3,057/m² (£241-£284/ft²) the rates adopted of £98-£110/ft² fall below those of the BCIS Median cost data for "810 Mixed developments" of £119.47/ft² for smaller developments. The corresponding Lower Quartile costs are £107.67/ft², which we would apply to larger sites.
- The split of costs selected by C&W is for sites <25 units, 25-74 and 75+ units, is well below the threshold that we would see costs moving from Median to Lower Quartile which in our experience usually occurs at sites of over 150 units.
- The flat build costs do not appear to be predicated on the size of the development and are defined for 3-5 story flat as £120/ft² and or 6+ storey flats as £147/ft². In this case they fall between the corresponding BCIS Median cost data for "816 Flats (Apartments)" of £136.01/ft² for 3-5 storey and £163.32/ft² for 6+ storey developments and the corresponding BCIS Lower Quartile cost of £119.94/ft² and 140.93/ft² respectively.
- The C&W assume alternative revenues of £240/ft² or less and £285/ft² or greater, a movement on their median position of £263/ft² of +/-8.5%.
- The corresponding movement of the C&W build costs is around +/-5% for the alternative revenues.
- The Commercial build cost of £49/ft² for industrial and £104/ft² for retail accords with our recent experience for these typologies.
- In addition, we do not agree with the indexing approach adopted by C&W, while it is true that the BCIS indices are suggesting low or even negative cost growth, this is essentially because the BCIS costs base is backward looking.
- We are aware for our current schemes that the impact of materials shortages, Covid compliant working practices, shortness of labour and other major infrastructure projects throughout the country are all having a significant impact on build costs.
- Anecdotal evidence of timber prices doubling and anticipated 8-15% increases in materials anticipated in January '22, in addition to increases of 30% to specialist trades over the last year go to the root of the inflationary pressures not being reflected in the BCIS indices.

2.3 External Works

- The C&W report at page 9 includes a range of assumed uplifts on House, Apartments and Commercial Build costs for external works, of 15%, 10% and 10% respectively.
- We agree with the allowance for Houses and Commercial.
- However, the allowance for apartments at 10% is, we believe low, as although these costs are shared, the costs themselves are significantly higher with the external works including parking circulation, bin stores, cycle stores, carpark lighting as well as enhanced planting to these areas, and therefore we would expect a minimum of 12.5% - 15% uplift on apartments for these costs.

2.4 Energy Requirements

- The C&W report at page 9 includes a sum for Renewable / Low carbon energy of £2,250 per plot.
- In line with the government white paper, we are currently allowing sums of £2,250 for compliance with the forthcoming Part F and £4,800 for post 2025 Part L requirements.
- Furthermore we, as are others in the field, are assuming a further allowance for zero gas, post 2025 of around £8,000 per plot.
- These costs do not appear to be included in the C&W appraisal.
- Decentralised Energy networks costs of 6% on base build cost have been allowed within C&W appraisal, in our experience this allowance is low, on schemes elsewhere we are seeing costs at this level where the energy centre has been established for some time and this level of costs would be applicable for each additional connection.
- Where a new system is being established, we are seeing costs of around 10% per plot.

2.5 Accessibility Standards

- The C&W allowances accord with our own view on similar schemes.

2.6 Site Specific Abnormal and Extra Over Development Costs

- The C&W allowance is stated as being £15,000 per plot, this is significantly lower than we expect to see.
- On a very simple scheme we would expect as a minimum a S106 / CIL exclusive abnormal cost of at least £20,000 - £25,000 per plot and on larger SUE schemes these costs can increase to as much as £60,000 per plot, although some of these additional costs have been covered elsewhere within C&W's cost base.

2.7 Contingency

- The C&W allowance is stated as being 5% of total costs.
- At this stage we would expect to see a contingency allowance of 10%, with a reduction down to 5% only being made at Reserved Matters stage.

2.8 Professional Fees

- The C&W allowance is stated as being 7% of total costs including contingencies.
- On a blended basis including house build this may be applicable, however on schemes with a heavy infrastructure burden we would expect, in the current market, to be carrying professional fees in the range of 10-12% on infrastructure costs.

Sensitivity

- 2.9** We note C&W's points in relation to sensitivity checking their assumptions. However, one point that stands out is at para 1.50 et al where reference is made to reducing the £2,250 rather than 6% of the base build cost being adopted in order to render the schemes viable.
- 2.10** Given that the 6% allowance is already too low the possible reduction to £2,250 appears moot.
- 2.11** Likewise, at para 1.74 C&W propose a number of adjustments, such as increasing sales values, reducing contingencies and reducing professional fees in order to test viability.
- 2.12** As noted above we believe that the contingency and professional fees allowances are already lower than we would expect to see. Furthermore, any increase in sales revenues would likely be matched by a similar or equal increase in build costs, thus reducing the benefit of this approach
- 2.13** It therefore appears that the C&W report is focussing on achieving the required affordable housing delivery at the cost of applying unattainable sensitivity adjustments.

3 Technical Solutions

Fiddlers Ferry

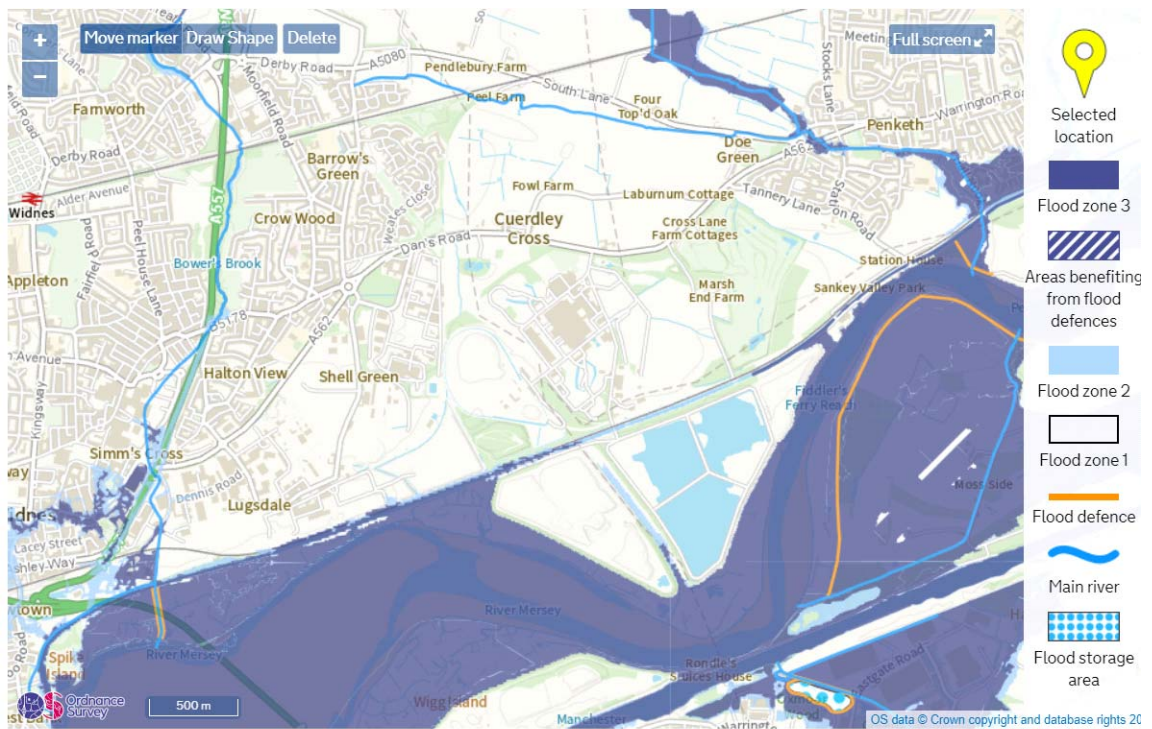
3.1 We have reviewed the Fiddler’s Ferry Technical Submission and the associated Masterplan along with the Infrastructure Delivery Plan and accompanying viability. It is very light in terms of the key considerations of remediating the contamination from the power station.

Flooding and Drainage

3.2 The site is largely free of flooding and although reference is made to Flood Zone 3, this is limited across the site and would seem to have a limited impact on the masterplan.

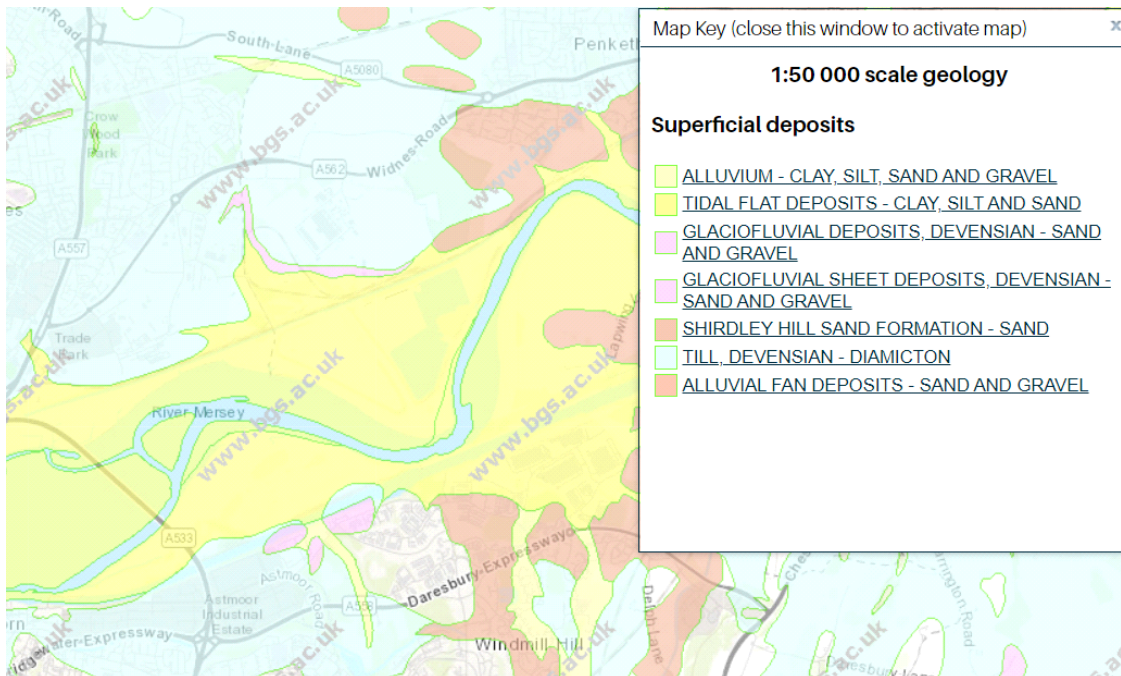
3.3 The site would be subject to sequential test with the site critiqued against other developments, but this would be seen to have been carried out if it was incorporated in the Local Plan and included in the Strategic FRA. The flood map for planning is shown below for your reference.

3.4 It is anticipated that there are existing drainage outfalls from the site to the River Mersey or the canal with sufficient capacity for the development to utilise. The north is separated from the river by the canal and the ownership of the canal is unknown. Otherwise, the landownership does not run continuously and the Vrnwy Aquaduct would act as a constraint for future drainage connections.

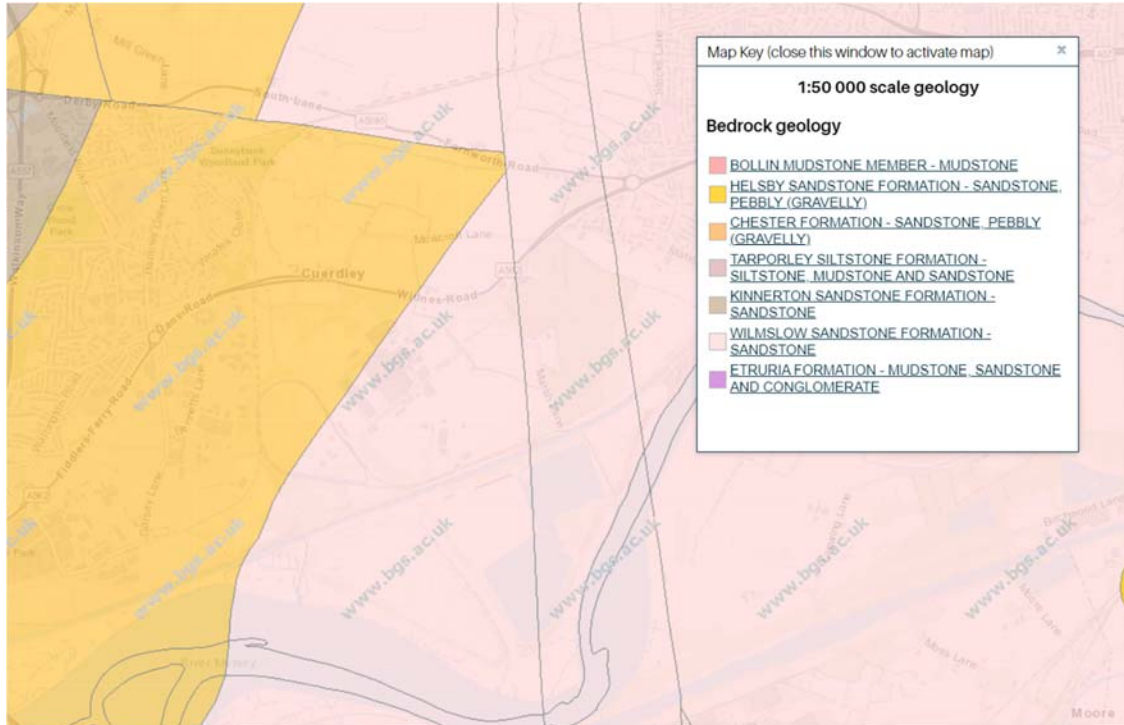


Ground Conditions

- 3.5 Within the Fiddler’s Ferry Technical Submission, it is stated that “there is evidence of potential contamination across the site”. We would say this is underplaying matters and would state that there would be significant remediation across the site.
- 3.6 The southern residential parcel on what is referred to as an “area of disturbed land”. This would require significant works to accommodate residential dwellings. There would be an impact on foundations and require the bulk removal of contaminated material.
- 3.7 This is assumed to be picked up in the C&W viability analysis, but they have referred to Fiddler’s Ferry as Greenfield in the Summary Typologies section (page 7). We would suggest that this would underestimate the works required for the development significantly as the power station, surrounded by chemical works, is not typical of brownfield sites and would be an outlier.
- 3.8 It may be that the Commercial Abnormals cost would include the full works to mitigate the site, but this is not clear and the figure of £32million could be an underestimate. Rugeley Site B was estimated to cost £21million to remediate and this was a site (139 Ha) half the size of Fiddler’s Ferry. Given the timescales and inflation, this is likely to increase further.
- 3.9 The underlying geology of the site is sandstone, but, critically, this is overlain by superficial deposits of Tidal Flat deposits. These are highly likely to require a piled solution for all foundations and would impact on the southern residential parcel. The northern residential parcel would found on glacial deposits, which could be hit and miss in terms of bearing capacity.



BGS Extract Superficial Deposits



BGS Extract Bedrock

Highways

- 3.10** There looks to have been significant work on the extent of interventions to mitigate the impact of the site. There is little to add in this regard other than £270k for interventions to a motorway junction (M62 Junction 8) seems very optimistic in our liaison with National Highways on other sites.

Utilities

- 3.11** A sum of £11m for offsite utility connections seems a reasonable figure for the development given the location of a strategic Grid Supply Point (GSP) on the site. The local sewage treatment works is in Warrington, and it is presumed that the connection will need to be made to a sewer in Warrington to supply the site with the delivery of a pumping station on site.
- 3.12** The Vyrnwy Aqueduct corridor is a significant obstacle between the southern residential parcel and the remainder of the site. There are no details available, but this could block the installation of services to the southern parcel and impact deliverability.
- 3.13** We have reviewed the HSE data and unfortunately due to the constraints by the large number of hazardous installations we were unable to determine the risk to development caused by the gas main, fuel pipeline and other services through the HSE's WebApp. It is suggested that HSE are contacted to review the impact. This indicates that there are significant constraints to development. These are not identified on a plan in the submission and may have an impact on the masterplan.

- 3.14** The private services (telecoms, private electricity connections, slurry pipes etc.) across the site will also be a risk to development and require further mitigation and diversion to facilitate the development. There does not appear to be any assessment of costs for the diversion and removal of services and utility assets across the site.

Sustainability

- 3.15** There does not seem to have been an allowance made for the FHS or car charging. Given the location of strategic electrical infrastructure it would be difficult to argue the impact of reinforcement, but there will be an increased cost with additional substations onsite and additional on plot cabling. This will be typically doubling the onsite costs for the electrical infrastructure.
- 3.16** In addition, FHS will add approx. £8k to the build cost of dwellings based on the “Centre for Sustainable Energy Cost of carbon reduction in new buildings Final report December 2018”, which informed the FHS consultation the following year.

Masterplan

- 3.17** While outside our areas of expertise, we would suggest that, in master planning terms, the southern parcel is very remote from the rest of the site and will not work as part of the delivery of a coherent development. The separation caused by the canal and aqueduct will have a technical impact on delivery, but also restricts the ability to amend the masterplan to stop the fragmented development.
- 3.18** We also note that the densities being aspired to appear to be undeliverable given the site constraints.

Strategic Infrastructure/ Abnormal Costs

- 3.19** The C&W report details various allowances per location.
- 3.20** In the absence of full information, we have reviewed the various inputs onto these costs and have a number of high-level concerns regarding the basis of these costs.
- 3.21** Generally, the costs seem lower than we would expect to see, notable examples include.
- Utility connection costs are typically increasing with the need to deliver all electric proposals and the infrastructure costs increasing as the network is stretched. This is site specific and can form an obstacle to delivery.
 - Need for diversions to facilitate development proposals and the associated highway improvements are atypical for developments.
 - The ground conditions and topography are site specific and can have significant impact both in terms of foundations and retaining walls and earthworks modelling.
 - The highway interventions are assessed separately to the IDP and therefore cannot be reviewed or assessed. However, some interventions, specifically to National Highways assets seem low.

3.22 We also note that for sites where there are extensive remediation works planned there are no apparent allowances for abnormal house foundations in these locations. Typically, in remediation sites we would expect to see a high proportion of piled foundations required to overcome the disturbed / made ground following remediation, with typical extra over costs for piled foundations of £6-10,000 per affected plot.

3.23 Overall we would expect that a reasonable range for site abnormals on a site such as Fiddlers ferry would be in the range of £35-50,000 per plot.

Appendix 2. BCIS Forecast Data



[English \(United Kingdom\)](#)

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News & opinion

12 AUG 2021

BCIS five-year forecast

Tender prices are under pressure from the sharply rising materials prices and longer supply times that have resulted from Brexit and Covid-19.

Tender prices will rise by 21% over the forecast period (2Q2021 to 2Q2026).

Tender prices are expected to rise by 3.9% in 2nd quarter 2022 compared with the same quarter in 2021, driven, in particular, by sharp materials cost increases and longer supply times. With demand increasing over the remainder of the forecast, and with less contractors in the market (liquidations during Covid-19), tender prices are forecast to increase faster than input costs, rising by around 3% to 4% per annum. If the access to European labour returns in the latter part of the forecast period it will ease the pressure on site rates and tender prices.

Although government guidance removed social distancing requirements on site in mid-July, contractors seem unlikely to change their Standard Operating Procedures immediately.

The BCIS Materials Cost Index shows that materials prices rose by 4.6% in 2nd quarter 2021 compared with the previous quarter, and by 10.0% compared with a year earlier. The forecast for 3rd quarter 2021 shows an increase of 2.8% compared with 2nd quarter 2021, and a 13.1% annual increase. Anecdotally, there has been a lot of concern about materials shortages this year, which has been reflected in longer lead times, higher prices and price volatility.

Materials shortages have resulted from a combination of a number of factors:

- Covid-19 has affected supply from mills and factories,
- supply chain bottlenecks due to global demand shocks,
- shortage of haulage drivers,
- container shortages and port delays,
- construction demand fluctuations - sharp falls in the first half of 2020 followed by a steep recovery since,
- increased administration at UK ports affecting imports and exports due to UK EU Trade and Cooperation Agreement,
- sharp rises in shipping costs and temporary surcharges.

Longer lead times for the supply of materials are likely to be reflected in the BCIS Market Conditions Index, with additional preliminaries costs, and will put upward pressure on tender prices.

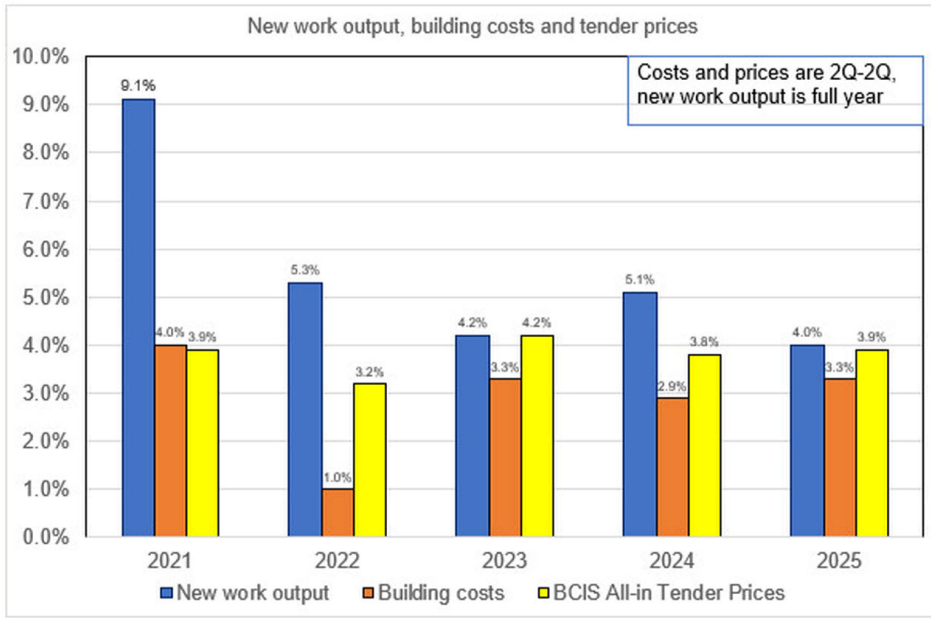
The Construction Leadership Council (CLC) has called for the inclusion of new contract clauses to allow for sharing the risk of sharp increases in materials and we may see a return to fluctuating price contracts for longer contract periods, but this is not allowed for in our forecasts.

Materials prices will rise by 15% over the forecast period (2Q2021 to 2Q2026). The main risks to materials prices will be difficulty in obtaining materials during the Covid-19 crisis, oil prices, tariffs on imports.

Building costs will rise by 15% over the forecast period (2Q2021 to 2Q2026).

New construction output will rise by 31% over the forecast period (2025 compared with 2020). This increase is exaggerated by the pandemic induced 16% fall in 2020.

The full forecast and commentary are published in the Briefing section of the BCIS Online service.



Appendix 3. Cost Related News Articles

News & opinion

24 JUN 2021

Housebuilder's costs on the rise

Housebuilders costs increased by 1.7% in 1Q2021 and by 3.6% between 1Q 2020 and 1Q 2021 according to the BCIS Private Housing Construction Price Index [PHCPI].

Housing construction output grew by 2.7% in 1Q2021 compared with the 4Q 2020 but fell by 1.2% on the annual basis.

Majority (94%) of respondents to the survey reported increases in costs. Of those, 44% stated increases in cost of materials, 37% indicated changes in both labour and material costs, 13% stated sub-contractors' costs while 6.0% indicated labour costs.

Insulation, aggregates, timber and timber products, steel as well as shortages of building materials, higher costs of transport, energy and labour costs/availability remain among the key cost pressures mentioned by respondents.

Cost pressure is expected to continue into the 2nd quarter of 2021, with respondents expecting their costs to continue rising by a further 2.1%.

The key factors influencing business operations in the first quarter as identified by the respondents were:

- material availability (56%)
- supply chain delays (17%)
- material price increases (11%)
- labour availability (11%) and
- reduced productivity (6%)

On site productivity continues to improving for companies across the sector. Respondents to the survey noted that on average, productivity in January to March compared with the levels pre-COVID-19 lockdown, stood at 93%, compared to 88% in December.

Current productivity as a % of pre-COVID-19

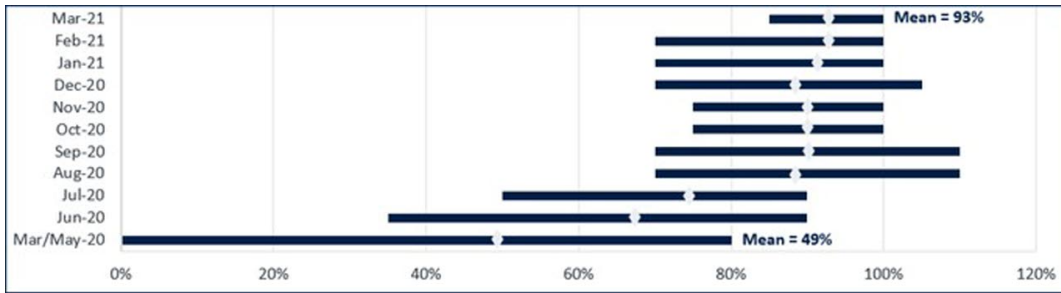


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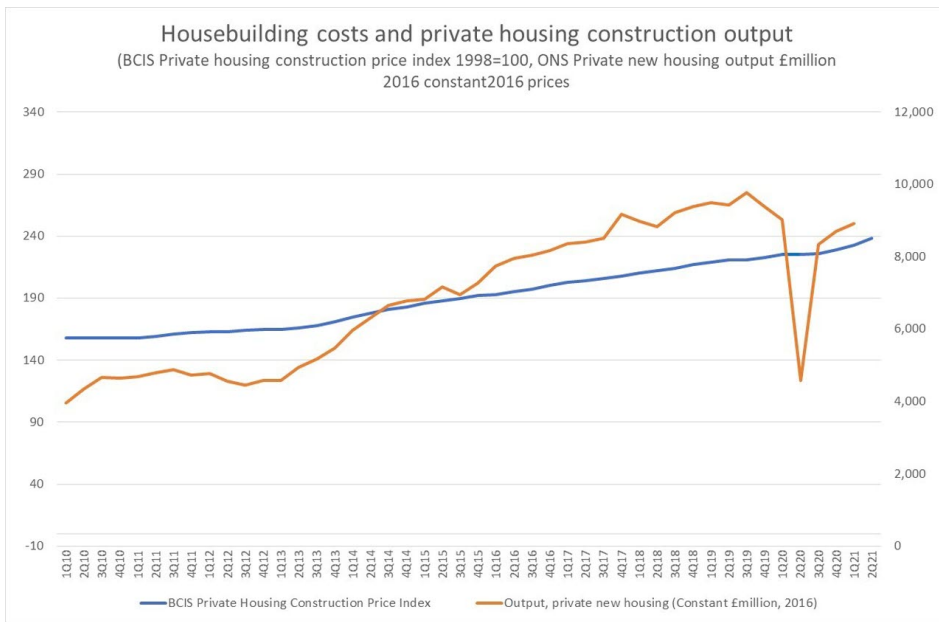


Source: BCIS PHCPI Survey

When asked about productivity once revised working practices are established, respondents expect productivity to range between 85% and 100%, at an average of 96% (as a % of pre-COVID-19).

The prospects of how the market rates in the construction industry will develop in the coming months is difficult to clearly define. Rising material and labour costs, shortages of construction materials and labour (including skill shortages), planning system and compliance availability, are perceived to be biggest challenges in 2021 by respondents.

We would like to thank respondents to this survey for their contribution.



Sources: Office for National Statistics (ONS), BCIS

The PHCPI is based on housebuilders' costs in constructing a standard house. The index is adjusted for changes in specification and reflects only the movement in the underlying direct costs to housebuilders.

The BCIS PHCPI is published in the BCIS Online service.

If you are a housebuilder and would like to participate in the BCIS PHCPI quarterly survey, please contact data@bcis.co.uk

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News / Data / RICS warns of 10% price hikes

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RICS warns of 10% price hikes

🕒 6 Aug Surveyors expect the cost of building materials to rise by 10% over the next year.



Construction growth is generating rising pressure on supply chains, the latest report from the Royal Institution of Chartered [Surveyors](#) (RICS).

The latest *RICS UK Construction & Infrastructure Survey* has found that a net balance of +38% of respondents reported a rise in workloads in the second quarter of 2021 over the previous quarter.

However, it also found that there were problems with the cost of materials and staff shortages.

Growth in the private residential sector continued to lead the construction market, with +50% of respondents reporting an increase in activity (up from +39% in the previous quarter and the strongest reading in the last six years). Infrastructure works also saw a rise, with a net balance of +45% reporting an increase (up from +34% in the previous quarter) – with new energy projects in particular being cited as the area behind this growth.

While respondents indicated the construction sector is now broadly recovering well from the Covid-19 pandemic, constraints on the market's return to normal were also becoming apparent. 82% of respondents pointed to a shortage of materials hampering the market during Q2, up from 57% previously. Moreover, the cost of materials is expected to increase by nearly 10% over the next twelve months, with these projections running ahead of the 7% growth anticipated for tender prices.

The Q2 [survey](#) also picked up concerns around labour shortages – both for skilled labour and white-collar roles – with a net balance of +64% saying a lack of labour will limit new activity (up from +42% in the previous quarter). The numbers citing bricklayer shortages has jumped from 34% to 58% and for carpenters it has increased from 33% to 55%.

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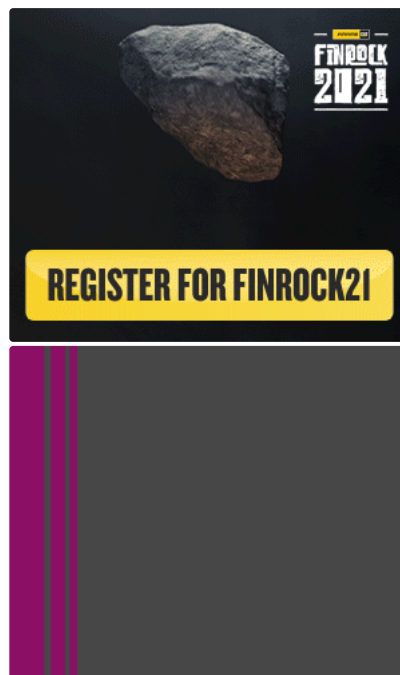
the latest net balance of +12% is consistent with only a modest improvement and other signals from the [survey](#) provide a note of caution, RICS said.

RICS chief economist Simon Rubinsohn said: "The tone to much of the feedback received in the Q2 Construction & Infrastructure Monitor is pretty upbeat with new business enquiries picking up smartly and this being reflected in the expectation that workloads will continue to grow strongly over the next year.

"Infrastructure and private housebuilding are viewed as likely to remain the most buoyant areas of the industry. Yet it is abundantly clear that a couple of issues present big challenges. Most notably at this point, the availability of building materials stands out as a key problem for respondents to the RICS [survey](#).

"But almost as significantly, labour and skills are increasingly being cited as obstacles for businesses looking to build out existing commitments or embark on new projects. For the time being, the issue appears most visible regarding skilled trades but quantity [surveyors](#) are also being highlighted as an area of growing shortage. Unsurprisingly against this backdrop, some concern is being expressed about rising construction costs."

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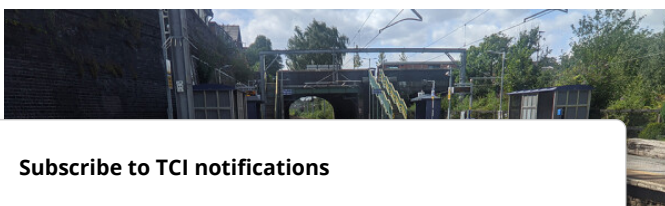
HS2 safety breaches on the rise in London

⌚ **4 hours** Reports are emerging of a growing number of lost-time injuries among workers on the HS2 project in London.



BBA takes on CARES with rebar certification

⌚ **22 hours** The British Board of Agrément has launched a certification scheme for reinforcing steel in direct competition with CARES, the UK Certification Authority for Reinforcing Steels.



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Construction Materials Shortage: Transport Issues a 'Pressing Concern'

By [Jack Woodfield](#) 3 days ago

The construction materials shortage remains with supply chains continuing to be affected by a lack of HGV drivers



(Image credit: getty images)

The construction materials shortage continues to be impacted by a lack of lorry drivers, which is now a "pressing concern across the supply chain", the Construction Leadership Council (CLC) says.

Dwindling supplies of key building materials such as roof tiles, cement and a [timber shortage](#) have impacted the construction industry all year, and prices have soared across several materials.

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The shortage is expected to continue throughout the year at the very least, and prices could climb higher in the short-term — between July 2020 and July 2021 the cost of materials rose by 20%, according to the Office for National Statistics (ONS).

Over the weekend the government confirmed that it will grant 10,500 visas to overseas lorry drivers and workers, with shortages also causing supply chain problems for supermarkets and petrol stations.

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If you're in the midst of a self build, [renovating a house](#), or undertaking a home improvement project, read on to help plan ahead for your project, and learn which materials are facing price rises or shortages this summer.

Construction Materials Shortages Now a National Challenge

From a lack of lorry drivers to record high construction vacancies, it is feared that the materials shortage could begin to impact the UK economy.

Construction accounts for roughly 6% of the UK's economic output, and Andrew Goodwin, chief UK economist at Oxford Economics, a consultancy firm, says delays caused to homebuilding and home improvement projects could have a "knock-on effect on the recovery if construction companies aren't completing projects quickly".

Mr Goodwin says the impact on the economy could become noticeable should homeowners be discouraged from improving their homes.

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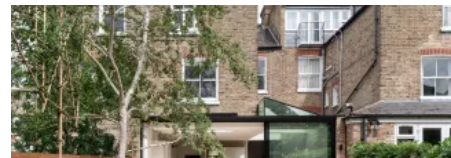
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The CLC said this month: "Within the UK, the shortage of HGV drivers is affecting every sector and will take many months to resolve, despite government action to increase driver testing. This is a major contributor to delayed deliveries in all construction product areas; one manufacturer reported 'factories piled with product that we cannot get out.'"



There is a nationwide shortage in lorry drivers. (Image credit: Getty Images)

The Federation of Master Builders (FMB) has called on the government to address the decline in construction, following the August IHS Markit/CIPS construction Purchasing Managers' Index (PMI), which revealed the lowest level activity of construction activity since February.

Brian Berry, chief executive of the FMB, said: "Disappointingly, we once again see construction output fall. I'm concerned that despite the high demand for home improvements, something which could stimulate economic recovery, we see this sector on the decline. We must pull together as an industry and press government to ensure these issues are dealt with quickly."

An emergency summit has been called by the Construction Alliance North East (CAN) in the North East for 1 October which will include the Builders Merchants Federation (BMF) to raise awareness of the deepening materials shortage crisis.

How the Construction Materials Shortage Could Affect You

Self builders

The materials shortages could come as blow to those working on [self build](#) projects who are building with steel or timber frame - materials which are



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both short in supply and have risen in cost.

Renovators

Renovators could also be affected by price increases. The cost of materials for repair and maintenance work rose 6.7% between June-July, and increased by 23% between July 2020 and July 2021, according to the BEIS [Monthly Statistics of Building Materials and Components](#) report for July.

DIYers

Building merchants are under increasing pressure, potentially leaving homeowners' DIY projects in doubt. Landscaping products and bagged cement have been in short supply this year.

SME builders

Brian Berry says some SME builders "are struggling to obtain the materials needed, and in some cases, small builders are actually saying they're concerned about the viability of their business."

Lead times and prices for timber have increased. (Image credit: Getty Images)

Which Materials are Affected?

Timber

There has been a nationwide timber shortage since the first lockdown in March 2020, and imports remain an issue, against a backdrop of high demand for wood and wood products.

Steel

Steel is in high demand globally, and shortages could persist until the end of the year. British Steel stopped taking orders on structural steel sections in May due to "extreme demand".

Roof tiles

Roughly half of National Federation of Roofing Contractors members reported a shortage of concrete roof tiles earlier this year. Lead times for concrete tiles are averaging 24-30 weeks.

Cement

Supplies of bagged cement have been strained since late last year, and while the CLC reports some easing in the shortages of bulk and bagged

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cement in August, delivery has been particularly constrained by the lack of domestic haulage capacity.

Electrical components

Certain electronic components, caused by a shortage of raw materials, could extend into next year.

Paint and coatings are in short supply. (Image credit: getty images)

Paints and sealants

Supplies to the UK are restricted due to a global shortage and cost of shipping containers.

Plaster and plasterboard

There was a severe [plaster shortage](#) earlier this year, and while supplies improved earlier this year, plasterboard has been subject to extended lead times, the CLC said in June.

There have also reportedly been shortages this year of:

- Concrete
- Insulation
- PIR insulation
- Bricks and blocks
- Kitchen carcassing
- Aggregates
- PE and PP plastics
- Screws
- Fixing
- Plumbing items
- Sanitaryware
- Shower enclosures

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When Will Supplies Return to Normal?

Professor Noble Francis of the Construction Products Association (CPA) said in August that supply issues are likely to remain a problem for the next six to nine months at least.

Brian Berry echoes this view, and has warned of "significant material shortages for at least the duration of 2021."

However, despite the current challenges, the CLC says that the supply chain is just about managing under unprecedented circumstances. "We are not

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out of the woods yet. While many factors could still cause disruption, we are currently in a better position than three to four months ago," it said.

Will Building Materials Prices go Down in 2021?

Prices have increased due to lengthening lead times and increasing demand, which is making it difficult for manufacturers and suppliers to build up stock levels.

Prices soared by 20.1% in July for all construction work, compared to this time last year, according to BEIS, and prices increased 4.5% for all work in July compared to June.

Jewson said this month that its prices for materials including timber, wheelbarrows, insulation and adhesives will rise by as much as a fifth. And Travis Perkins announced price rises earlier this year.

The FMB's latest State of Trade Survey revealed that 98% of its members are experiencing price rises. This is expected to continue into late-2021.

These are some of the materials which have been affected:

Materials Price Tracker

Material	Information
Timber	The price of imported sawn or planed wood jumped by more than a fifth between June and July, according to BEIS, and imported plywood is up 82% over the past year
Steel	Fabricated structural steel prices jumped 53.3% in the year to June, according to BEIS.
Cement	Cement prices have risen as much as 30%, as reported by The Telegraph. In June, Travis Perkins said the price of bagged cement will rise by 15%.
Paint	The costs of paints and varnishes are up by nearly a third, according to the Construction Products Association.
Chipboard	Chipboard costs went up by 10% in May, Travis Perkins confirmed

However in the US, lumber prices fell as much as 6% earlier in June, according to Bloomberg, despite rising over 175% in the past year.

And the CLC has said that although product and material price inflation has slowed, indications are that it will be 2022 before prices stabilise.

Why is There a Shortage of Building Materials?

The construction materials shortage can in part be traced back to increased building and home improvement activity in 2020, particularly during the first lockdown. This led to a slowdown in the production of materials from some factories in the EU, and supply chains have remained stretched ever since.

But while construction output reached a 24-year high in June, demand is not being met by supply, and suppliers' delivery times have lengthened.

Lack of lorry drivers

There is now a shortage of more than 100,000 drivers in the UK, out of a pre-pandemic total of about 600,000, according to a survey of Road Haulage Association member estimates.

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Some suppliers have reportedly asking builders' merchants to collect their orders as they cannot get enough drivers to complete deliveries.

Labour challenges

Labour rates have skyrocketed in some areas, due to a combination of demand outstripping labour supply, and some trades putting up their rates due to being overwhelmed with work.

Builder Andy Stevens from [Eclipse Property Consultants](#) says: "Labour rates have gone through the roof in some areas, all driven by market factors. Firstly, a number of Eastern European workers went back to their respective countries as a result of Brexit; this has hit the south east in particular."

Many of us have taken to DIY and home improvement projects during the past year.
(Image credit: Beldebos Landscapes)

The demand for construction workers is now close to 20-year high, [according to the Office for National Statistics](#) (ONS), with employment in the construction sector falling from 2.3m in 2017 to 2.1m at the end of 2020. This represents a 4% fall in UK-born workers and a 42% fall in EU workers.

Jobs website Indeed says construction has seen the highest growth in average advertised salaries since July, while Noble Francis expects 500,000 UK-born workers to leave the industry in the next 10 years as a demographic "bulge" of 50 to 65-year-olds retires.

Brexit uncertainty

Knock-on effects from Brexit remain, with roughly 60% of imported materials used in UK construction projects comes from the EU, according to the CLC. And despite this year's UK-EU trade deal easing [Brexit construction](#), Brexit has lengthened the supply lines for a number of core supplies from Europe.

The Timber Trade Federation (TTF) said in May that Brexit-related complications have squeezed UK timber stocks, as 80% of the softwood used in building comes from Europe, and 90% of the softwood used for new build homes comes from the continent.

Noble Francis adds that January's new immigration system has made it harder to tempt EU workers back who left during the pandemic. "The small builders and specialist contractors are likely to be the worst affected by this as they are the least likely to have the resources available," Francis said.

Raw materials

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There is currently a global shortage of raw material shortages, stemming from global demand and other external factors (including the slowdown and in some instances, factory closures, outside the UK), which continues to constrain production of certain products, such as insulation, paints and adhesives, as well as packaging for products.

How to Navigate Shortages

If you're planning or in the middle of building work, then planning as far as you can in advance is pivotal to ensure you aren't caught out by shortages or price rises.

The CLC advises self builders to work closely with their supply chain and communicate your requirements early with suppliers, distributors and builders merchants.

And Brian Berry says: "Product availability is proving to be a significant and prolonged issue for Britain's builders, and consumers need to be aware that the cost of their building projects may change in the months ahead because of this pressure.

"However, I would caution against homeowners compromising quality and customer service, and defaulting to hire the builder with the cheapest quote."

You can also use services such as [Environmate](#) to discover free and cheap building materials for your project.

Jack Woodfield

Jack is News Editor for Homebuilding & Renovating, and strives to break the most relevant and beneficial stories for self builders, extenders and renovators, including the latest news on the construction materials shortage and planning reforms. Having bought his first home in 2013, he and his wife have renovated almost every room and recently finished a garden renovation.

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Construction industry

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Cost of building work on UK homes to rise as price of materials soars

Zoe Wood

🐦 @zoewoodguardian

Sat 8 May 2021 08.00 BST

UK homeowners face higher bills for renovation work as builders grapple with soaring material costs and shortages of essentials ranging from concrete and timber to taps and roof tiles in a booming [housing market](#).

“It is a bit like going to Sainsbury’s and them not having any bread, milk or eggs in,” said Paul Bence, the managing director of builders merchants Bence, of the runaway demand for supplies that is emptying shelves. “Cement is our bread and butter and we would normally keep a good 10 days stock. We would not operate a ‘just-in-time’ model ... but that’s effectively where we are right now.”

The overheating market for building materials has triggered widespread price increases of more than 10%, said Bence. He said the sharp rise meant builders, who

price jobs months in advance, were in the difficult position of having to go back to customers and say: “I’ve got to increase the price of your job.”

The latest snapshot of activity in the country’s construction sector, published on Friday, showed April was another strong month for the trade, following on from March when firms reported the [sharpest pickup in activity since 2014](#). However, the IHS Markit/Cips UK survey flagged up that input-cost inflation had increased for the seventh month in a row to its highest level since the survey began in 1997. Firms singled out particularly sharp rises in the cost of steel and timber.

Only a quarter of the materials used by the construction industry are imported but price increases in some areas are substantial.

Timber has gone up more than 80% in the past six months, while copper and steel prices have jumped by 40%, according to Noble Francis, economics director at the Construction Products Association.

The costs of paints and varnishes are up by nearly a third, while polymers such as polyethylene and polypropylene have risen by 60%.

Project costs would not increase by the same magnitude due to the high proportion of goods made in the UK and because home improvement work is more labour intensive than other construction sectors, “so it’s the labour cost that dominates, rather than the product cost”, said Francis.

The supply problem is particularly acute for roofers as the lead time for concrete tiles has tripled to three months. With the price of timber battens, steel beams and plastic insulation all going up too, material costs were up by about 50%, said James Talman, chief executive of The National Federation of Roofing Contractors (NFRC).

The squeeze faced by roofers is unparalleled in “living memory”, according to the NFRC, which has issued a letter to members telling them to “start talking to your clients about price rises” and helping them to explain the complex backdrop to the supply problem to customers.

The production of building materials was severely affected by the original lockdown when many factories and timber mills closed. Since reopening firms have struggled to catch up as pandemic-related restrictions held back production and global demand spiked as economies reopened.

The problems come at a time when the number of new homes being built is at its highest level in a decade and locked-down Britons have been [funnelling cash saved on holidays and commuting into their homes](#). There has been no let up this year as in the first three months of 2021 enquiries made to local building firms increased at

their fastest rate in a decade, according to the Federation of Master Builders, with demand strongest in the so-called “repair, maintenance and improvement” market.

There is also a labour shortage, which means homeowners are [waiting months longer than usual for bathrooms and kitchens to be installed](#) as there are not enough fitters. Builders are also struggling to recruit bricklayers, joiners and even general labourers.

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With some builders merchants reporting sales growth of up to 40% over the past year, John Newcomb, the chief executive of the Builders Merchants Federation (BMF) said the industry was seeing “quite incredible demand”. “You can’t point the finger at anybody because so many different materials have availability issues right now. People who have been in this industry for over 30 years say they’ve never seen anything like it.”

The squeeze did not mean houses or schools “were not being built”, said Newcomb, because small jobbing builders are in the frontline of the crisis. “We’re fighting hand to mouth to make sure materials are getting through. It’s just people have to wait longer and, of course, raw material prices are going up, so they are having to pay more.

“The jobbing builder has traditionally gone into a merchant and said I want three of this and six of that; those days are gone,” said Newcomb.

The same was true for DIY shoppers who wanted to buy paving stones or fence panels. “The key thing is not to go in expecting you can turn up at the door and just take those materials away, because that is not going to happen.”

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Building projects hit by lack of supplies and price rises

By [Simon Read & Niall-James Convery](#)
Business reporters, BBC News

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Building materials are running short in the UK leaving DIY projects in doubt

Building materials are running short in the UK, leaving DIY projects in doubt and building companies under pressure.

The Construction Leadership Council **has warned** that cement, some electrical components, timber, steel and paints are all in short supply.

It blamed "unprecedented levels of demand" that are set to continue.

The Federation of Master Builders said that some building firms may have to delay projects and others could be forced to close as a result.

"Small, local builders are being hit hardest by material shortages and price rises," said chief executive Brian Berry.

"We can't build our way to recovery from the pandemic if we don't have the materials."

Roland Glancy, managing director of design service Peek Home, advised people to delay home improvement projects until autumn.

"The last thing you want is to knock through a wall and then struggle to get hold of a bag of plaster to complete your vision leaving you living in a building site, just when we should be enjoying our new freedoms," he said.

Prices rising

The supply problems stem from a number of factors. Construction industry projects have surged since lockdown began easing which has led to skyrocketing demand for already scarce materials.

There are also issues hitting specific products, such as the warmer winter affecting timber production in Scandinavia while the cold winter weather in Texas affected the production of chemicals, plastics and polymer.





There has also been a sharp rise in shipping costs, said Noble Francis, economics director of the Construction Products Association.

"Shipping costs have risen sharply due a shortage of empty containers from Covid-19-related issues and the sharp recovery in global demand," he told the BBC.

For instance the cost of shipping a 40ft container from Asia to Northern Europe soared from \$1,500 (£1,061) in summer 2020 to more than \$8,300 (£5,873) by May 2021, he said.

With demand globally increasing and the UK importing many of its raw materials, lead times for orders are lengthening while prices are shooting up.

'I'm being quoted £10,000 for a £5,000 bathroom job'

Mohsen Kashan of Milton Keynes has been waiting nine months to have his bathroom renovated after a leak.

But with problems getting parts and tradespeople he told the BBC he now simply can't afford the rising costs he is being quoted.

"It's a simple job for a small bathroom just 2 metres by 2.5 meters. But we have been quoted £10,000 for what used to be less than £5,000.

"To expect to pay between £8,000 and £10,000 for a small bathroom seems too much," Mohsen said.

He's been struggling since September to get the repairs done.

"We've tried B&Q, a couple of other stores, as well as installers and half a dozen fitters.

"Either the cost of the materials has been too high, the cost of labour too high or materials are simply unavailable."

The Office for National Statistics has projected a rise of 7-8% in material prices, with increases for certain materials, such as timber, expected to more than double during the course of the year.

"My members are experiencing price rises of 10-15% across the board, rising to 50% on timber and 30% on cement," said Mr Berry.



Amy Archer says her firm has never experienced such severe shortages

'Unprecedented demand'

"It is really challenging in terms of supplies. It's nothing that we've ever experienced before," said Amy Archer, deputy managing director of the Swift Group, based in Cottingham near Hull, which makes caravans, motorhomes and holiday homes.

She said there are two issues: "The first is a shortage of materials in the first place and the delays that we've seen through the ports because of shipping container shortages."

The second is rising prices: "Commodity prices are going up because there's such a huge demand for products."

Booming activity domestically hasn't helped too, she said. "Lots of people are doing home improvements such as new kitchens and that's all draining the materials that are available."

Bayram Timber's Chris Husband says wood prices are rising fast.

"This really is unprecedented," said Chris Husband, commercial director at wood supplier Bayram Timber. "The sheer volume of timber that's being demanded at the moment, they are struggling to keep pace with it in Scandinavia, where we source most of our raw material."

His company, based in North Ferriby near Hull, competes against others across the globe for the timber and is "having to wait in line", he said. "It's having a huge inflationary effect on the raw material price and obviously the lead times as well."

Is the current situation here to stay? "We're pretty much certain that this is with us for the rest of this year," he said.

Brexit effect

Brexit has also affected the UK's timber supply as 80% of softwood comes from Europe, said Thomas Goodman, construction expert, from MyJobQuote.

Steel is also in short supply, as global demand exceeds supply. "Many steel manufacturers have stopped taking orders, as they are worried that panic buying will result in extremely low stock," he said.

The shipping costs issue is likely to subside in the next three to six months but global demand is likely to remain high for the next six to nine months, predicted Mr Francis.

Mr Berry pointed out that small builders can't stockpile or plan jobs far in advance, unlike larger firms, so they need to be assured that the materials will be at the merchants when they need them.

"Consumers must be aware that shortages are causing delays to projects, and that costs may change in the months ahead because of this pressure," he said.

Building materials supplier Travis Perkins said: "In instances where we have seen some challenges posed by global demand for raw materials or inflationary pressures, we continue to work closely with our suppliers and partners to ensure healthy stock availability for our customers."

But with higher material prices for the moment, many homeowners and builders are choosing to delay work until the necessary resources become more affordable.

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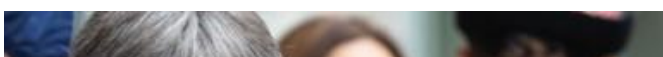
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Features



Appendix 4. Additional Typology Appraisal Summary

APPRAISAL SUMMARY**ROGER HANNAH LTD****Greenfield Suburb Mid Value****Appraisal Summary for Phase 1**

Currency in £

REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales
Private Housing	105	123,375	270.00	317,250	33,311,250
Affordable housing	<u>45</u>	<u>36,810</u>	150.75	123,314	<u>5,549,108</u>
Totals	150	160,185			38,860,358

NET REALISATION**38,860,358****OUTLAY****ACQUISITION COSTS**

Residualised Price (10.70 Acres @ 323,222.83 /Acre)		3,458,484			
				3,458,484	
Stamp Duty			162,424		
Effective Stamp Duty Rate		4.70%			
Agent & Legal Fee		1.80%	62,253		
					224,677

CONSTRUCTION COSTS

Construction	ft²	Build Rate ft²	Cost		
Private Housing	123,375	98.00	12,090,750		
Affordable housing	<u>36,810</u>	98.00	<u>3,607,380</u>		
Totals	160,185 ft²		15,698,130		
Contingency		5.00%	784,906		
Section 106	150 un	6,291.00 /un	943,650		
					17,426,686

Other Construction

External works		15.00%	2,354,719		
Garages			255,000		
Accessibility standards			270,165		
energy requirements	150 un	7,000.00 /un	1,050,000		
abnormal/extra over costs	150 un	20,000.00 /un	3,000,000		
					6,929,884

PROFESSIONAL FEES

Professional fees		7.00%	1,263,699		
					1,263,699

MARKETING & LETTING

Marketing		3.00%	999,338		
					999,338

DISPOSAL FEES

Sales Legal Fee		0.50%	194,302		
					194,302

FINANCE

Debit Rate 6.000%, Credit Rate 0.000% (Nominal)					
Land			265,104		
Construction			88,233		
Other			237,878		
Total Finance Cost					591,215

TOTAL COSTS**31,088,285**

APPRAISAL SUMMARY**ROGER HANNAH LTD****Greenfield Suburb Mid Value
PROFIT****7,772,072****Performance Measures**

Profit on Cost%	25.00%
Profit on GDV%	20.00%
Profit on NDV%	20.00%
IRR	41.72%
Profit Erosion (finance rate 6.000)	3 yrs 9 mths

Appendix 5. Fiddlers Ferry Phase I Residential Appraisal Summaries

APPRAISAL SUMMARY**ROGER HANNAH LTD****Phase 1****Appraisal Summary for Phase 1**

Currency in £

REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales
Private housing	210	246,750	255.00	299,625	62,921,250
Affordable housing	<u>90</u>	<u>73,650</u>	142.37	116,506	<u>10,485,551</u>
Totals	300	320,400			73,406,801

NET REALISATION**73,406,800****OUTLAY****ACQUISITION COSTS**

Residualised Price (Negative land)	(5,804,160)	(5,804,160)
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CONSTRUCTION COSTS**Construction**

	ft²	Build Rate ft²	Cost	
Private housing	246,750	98.00	24,181,500	
Affordable housing	<u>73,650</u>	98.00	<u>7,217,700</u>	
Totals	320,400 ft²		31,399,200	31,399,200

Contingency		5.00%	2,672,551	
Section 106 costs	300 un	9,714.00 /un	2,914,200	
				5,586,751

Other Construction

External works		15.00%	4,709,880	
Abnormal/EO costs	300 un	40,000.00 /un	12,000,000	
Energy requirements	300 un	7,000.00 /un	2,100,000	
BNG delivery			184,607	
Accessibility standards			540,330	
off-site highways	300 un	8,390.00 /un	2,517,000	
off-site utilities	300 un	1,569.00 /un	470,700	
				22,522,517

PROFESSIONAL FEES

Fees		7.00%	3,928,650	3,928,650
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MARKETING & LETTING

Marketing		3.00%	725,445	725,445
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DISPOSAL FEES

Sales Legal Fee		0.50%	367,034	367,034
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FINANCE

Debit Rate 6.000%, Credit Rate 0.000% (Nominal)				
Land			(82,275)	
Construction			82,275	
Other			35	
Total Finance Cost				35

TOTAL COSTS**58,725,472****PROFIT**

APPRAISAL SUMMARY**ROGER HANNAH LTD**

Phase 1

14,681,329

Performance Measures

Profit on Cost%	25.00%
Profit on GDV%	20.00%
Profit on NDV%	20.00%
IRR	N/A
Profit Erosion (finance rate 6.000)	3 yrs 9 mths

APPRAISAL SUMMARY**ROGER HANNAH LTD****Phase 2****Appraisal Summary for Phase 1**

Currency in £

REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales
Private housing	210	246,750	255.00	299,625	62,921,250
Affordable housing	<u>90</u>	<u>73,650</u>	142.37	116,506	<u>10,485,551</u>
Totals	300	320,400			73,406,801

NET REALISATION**73,406,800****OUTLAY****ACQUISITION COSTS**

Residualised Price (Negative land)	(5,804,160)	(5,804,160)
------------------------------------	-------------	-------------

CONSTRUCTION COSTS**Construction**

	ft²	Build Rate ft²	Cost	
Private housing	246,750	98.00	24,181,500	
Affordable housing	<u>73,650</u>	98.00	<u>7,217,700</u>	
Totals	320,400 ft²		31,399,200	31,399,200

Contingency		5.00%	2,672,551	
Section 106 costs	300 un	9,714.00 /un	2,914,200	
				5,586,751

Other Construction

External works		15.00%	4,709,880	
Abnormal/EO costs	300 un	40,000.00 /un	12,000,000	
Energy requirements	300 un	7,000.00 /un	2,100,000	
BNG delivery			184,607	
Accessibility standards			540,330	
off-site highways	300 un	8,390.00 /un	2,517,000	
off-site utilities	300 un	1,569.00 /un	470,700	
				22,522,517

PROFESSIONAL FEES

Fees		7.00%	3,928,650	3,928,650
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MARKETING & LETTING

Marketing		3.00%	725,445	725,445
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DISPOSAL FEES

Sales Legal Fee		0.50%	367,034	367,034
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FINANCE

Debit Rate 6.000%, Credit Rate 0.000% (Nominal)				
Land			(82,275)	
Construction			82,275	
Other			35	
Total Finance Cost				35

TOTAL COSTS**58,725,472**

APPRAISAL SUMMARY**ROGER HANNAH LTD****Phase 2****PROFIT****14,681,329****Performance Measures**

Profit on Cost%	25.00%
Profit on GDV%	20.00%
Profit on NDV%	20.00%

IRR	N/A
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Profit Erosion (finance rate 6.000)	3 yrs 9 mths
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APPRAISAL SUMMARY**ROGER HANNAH LTD****Phase 3****Appraisal Summary for Phase 1**

Currency in £

REVENUE

Sales Valuation	Units	ft²	Sales Rate ft²	Unit Price	Gross Sales
Private housing	182	213,850	255.00	299,625	54,531,750
Affordable housing	<u>78</u>	<u>63,830</u>	142.37	116,506	<u>9,087,477</u>
Totals	260	277,680			63,619,227

NET REALISATION**63,619,227****OUTLAY****ACQUISITION COSTS**

Residualised Price (Negative land)	(5,033,520)	(5,033,520)
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CONSTRUCTION COSTS**Construction**

	ft²	Build Rate ft²	Cost	
Private housing	213,850	98.00	20,957,300	
Affordable housing	<u>63,830</u>	98.00	<u>6,255,340</u>	
Totals	277,680 ft²		27,212,640	27,212,640

Contingency		5.00%	2,316,211	
Section 106 costs	260 un	9,714.00 /un	2,525,640	
				4,841,851

Other Construction

External works		15.00%	4,081,896	
Abnormal/EO costs	260 un	40,000.00 /un	10,400,000	
Energy requirements	260 un	7,000.00 /un	1,820,000	
BNG delivery			159,993	
Accessibility standards			468,286	
off-site highways	260 un	8,390.00 /un	2,181,400	
off-site utilities	260 un	1,569.00 /un	407,940	
				19,519,515

PROFESSIONAL FEES

Fees		7.00%	3,404,830	3,404,830
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MARKETING & LETTING

Marketing		3.00%	628,719	628,719
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DISPOSAL FEES

Sales Legal Fee		0.50%	318,096	318,096
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FINANCE

Debit Rate 6.000%, Credit Rate 0.000% (Nominal)				
Land			(77,443)	
Construction			78,296	
Other			2,415	
Total Finance Cost				3,268

TOTAL COSTS**50,895,399****PROFIT**

APPRAISAL SUMMARY**ROGER HANNAH LTD****Phase 3****12,723,828****Performance Measures**

Profit on Cost%	25.00%
Profit on GDV%	20.00%
Profit on NDV%	20.00%
IRR	N/A
Profit Erosion (finance rate 6.000)	3 yrs 9 mths



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