Paper 3: The housing land supply

Warrington Local Plan Pre-submission Draft representations on behalf of Peel L&P Holdings (UK) Limited

November 2021

Turley

Contents

Client
Peel L&P Holdings (UK) Ltd

Our reference
PEEM3056

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1. Introduction

1.1 This Paper forms part of a suite of documents which together comprise the submission of Peel L&P Holdings (UK) Ltd ("Peel L&P") ("Peel") to the Warrington Proposed Submission Version Local Plan 2021 ("PSLP 2021") and accompanying background documents published by Warrington Borough Council ("the Council").

Peel's Representations

1.2 Peel's representations are contained chiefly within a number of separate but related 'strategic papers'.

1.3 Paper 1 provides an overview of Peel's representations to the PSLP 2021 and introduces three further papers and supporting materials. This paper (Paper 3) should be read in conjunction with the remainder of Peel's submission and particularly Paper 1.

1.4 The full list of papers are as follows:

- Paper 1: Main representation
- Paper 2: Technical review of the proposed housing requirement
- Paper 3: The Housing Land Supply (this paper)
- Paper 4: The Outlying Settlements

1.5 Peel L&P has a number of land and development interests across the Borough to which its representations relate. Paper 1 presents an overall summary of Peel's representations on the PSLP 2021, the critical points of soundness raised and modifications needed to correct soundness. This Paper (Paper 3) informs Peel's overall position on the PSLP as set out in Paper 1.

This paper

1.6 This paper is concerned with the proposed PSLP 2021 housing land supply upon which the plan is reliant to deliver the housing requirement. As separate to Peel's representations in relation to Paper 2, it considers whether this supply will meet the PSLP 2021's proposed development requirements and whether therefore the PSLP 2021 meets the requirements of the National Planning Policy Framework (NPPF) in this regard, cognisant of the need to satisfy paragraph 68 of the NPPF.

1.7 This Paper is structured as follows:

- Section 2 summarises the Council's claimed developable supply
- Section 3 provides a critique, on a site-by-site basis, of the supply from the urban area and whether this is developable

- Section 4 considers the town centre market, whether, to the extent to which this geographic area is relied upon, it will meet the qualitative housing needs of the Borough and from a market perspective, the prospect of this location delivering housing at the level proposed through the PSLP 2021.

- Section 5 provides summarising comments

1.8 Green Belt releases proposed to meet the Borough's housing requirements and the extent to which these present the most sustainable options relative to reasonable alternatives are considered in Paper 1.

2. The proposed housing land supply

2.1 The PSLP 2021 is reliant on a claimed urban land supply of 11,785 units to be developed over the plan period[1]. This is supplemented by Green Belt releases with a claimed capacity of 4,850 units over the plan period across three sites. The former includes allocations at Warrington Waterfront (1,070 dwellings) and a significant yield from sites within the Town Centre. The Transport Model Testing of the WBC Local Plan (August 2021) identifies a supply of 4,365 dwellings from within the Town Centre[2], though this isn't explicitly set out in the PSLP 2021. The typical density assumed to be achieved on sites in the town centre is 275 dwellings per hectare[3].

2.2 The PSLP 2021 evidence base does not provide a transparent breakdown of the urban area supply by site. The latest Strategic Housing Land Availability Assessment (SHLAA) has a base date of 2020. It identifies a developable supply of 10,430 from specific sites and a small sites (windfall) allowance to 2035[4] with four sites projected to deliver a further 717 additional dwellings beyond 2035[5]. By contrast the PSLP 2021 identifies an urban supply of 11,785 dwellings from 2021 to 2038. This cannot be verified by reference to the 2020 SHLAA.

2.3 The PSLP 2021 does not define the Town Centre as a 'Main Development Area' (see Section 10 of the PSLP 2021), though it is noted that the claimed yield from sites in this area informed by the output of a 2018/19 Town Centre Masterplanning exercise undertaken by Aecom on behalf of the Council. This results in a significant uplift from this location compared to that achieved through applying standard density assumptions, out of which a significant reliance on the Town Centre to deliver the PSLP 2021's housing requirements arises. This reflects the expectation that sites within the masterplan area will be developed at a very high density reflecting the aspiration for the development of a modern, 'urban living' market in the Town Centre, delivering significant numbers of units relative to the land available and the size of sites. The PSLP 2021 is heavily reliant upon delivery in the Town Centre as a result.

2.4 To give an indication of the impact of the town centre masterplan, and so the step-change between the 2018 and 2020 SHLAAs, the Council's 2019 Urban Capacity Assessment records the capacity of the Town Centre sites based on the 2018 SHLAA and the uplift to this based on the effect of the masterplan. Based on the 2018 SHLAA, cumulatively sites in the town centre are reported to have a total 15-year developable capacity of 2,919 dwellings. Based on the effect of the town centre masterplan, this same supply of sites is assumed to have an assumed capacity of 6,549 dwellings over a 20 year period to 2037 – an increase of some 80% on the SHLAA figures.[6]

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[1] Development Options and Site Assessment Technical Report (Warrington Council September 2021) Table 1

[2] Table 3.2

[3] Warrington Council Strategic Land Availability Assessment 2020 Appendix 4

[4] Warrington Borough Council Strategic Housing Land Availability Assessment 2020 Table 3.7

[5] By reference to the pro-formas at Appendix 1 of the SHLAA

[6] Warrington Borough Council Urban Capacity Assessment Table 1 Urban Capacity Statement Final (warrington.gov.uk)

2.5 At this point in the process, the most recent evidence available regarding the composition of the urban supply is the 2020 SHLAA. It is noted that the 2020 SHLAA now reflects the output of the aforementioned town centre masterplaning. As highlighted above, the 2020 SHLAA does not itself present a complete picture having a base date 1 year before the start of the plan and including a number of sites which have already delivered units outside of the plan period (I.e. before 2021). The Council has therefore not provided transparent evidence relating to housing supply from the urban area. At this point, there is insufficient material to demonstrate that there are developable sites in the urban area which can cumulatively provide 11,785 residential units as is the Council's claim.

2.6 Without the composition of the claimed supply being provided, it is not possible to fully critique this as part of representations to the PSLP 2021. This is a deficiency in the evidence base which on its own renders the PSLP 2021 unsound. In order that a full critique of the housing land supply can be carried out, it is essential that the Council publishes an up to date evidence base which outlines, in detail, the components of the supply from 2021 to 2038 on a site by site basis, including confirming and evidencing a total figure for the town centre.

2.7 Notwithstanding this, and without prejudice to its future review of the supply information as it is made available, which it reserves the right to carry out, Peel has sought to undertake analysis of the supply information available insofar as this provides an indication of the likely makeup of the Council's claimed supply. This is considered in section 3.

3. Deconstructing the urban land supply

Site analysis

3.1 Taking the urban land supply identified through the 2020 SHLAA, Peel has carried out a full review of sites which it is assumed PSLP 2021 is reliant upon to deliver its housing requirement. This has included a critique of sites proposed to deliver 40 or more units to assess whether they meet the definition of being developable, as embedded in NPPF, to the level assumed by the Council.

3.2 Presented at Appendix 1 is a full analysis of sites proposed to provide over 40 units during the plan period based on available information. This analysis assesses whether the identified yield is realistic on a site-by-site basis at the level assumed by the Council by reference to likely site constraints, the site's suitability in principle, the site's availability and evidence of the landowner or developer's intentions regarding the site. The assessment is informed by a consideration of:

- Environmental constraints which may be present (e.g. flood risk zone or substantial tree coverage)
- Adjacent uses and whether they could impact on the site and its suitability for residential uses
- Whether the site is presently in active and permanent use
- The site's planning history, including where there is evidence of development not progressing
- Potential access constraints
- Whether the site is affected by any heritage related constraints which could limit its development potential
- The site's previous use and whether this could affect ground conditions and so abnormal costs
- Any policy protection which the site benefits from

3.3 The schedule at Appendix 1 notes that a number of sites, with a combined yield of 1,115 dwellings, appear to have been delivered before 2021. These cannot contribute to the 2021 to 2038 supply therefore and it is assumed do not form part of the Council's claimed supply of 11,785 dwellings. For the reasons noted above, it has not been possible to verify this.

3.4 The assessment also records that, in combination, the sites from the 2020 SHLAA which are yet to be developed, and so which it is assumed form part of the Council's claimed urban land supply for 2021 to 2038, have a developable capacity of some 3,446 less than claimed by the Council through the SHLAA process when the 'developable' test is properly applied. Accordingly, and to the extent that sites in the 2020 SHLAA are intended to form part of the 2021 to 2038 supply figure of 11,785, the proper capacity of the urban area is at least 3,446 dwellings less than claimed by the Council (i.e. 8,339 dwellings).

3.5 Through the analysis carried and presented in this Paper, it is evident that the portfolio of sites assessed cannot reasonably be defined as developable to the level claimed by the Council. A number simply do not satisfy the developable test whilst in a number of other cases the Council has significantly overestimated the developable yield.

Waterfront

3.6 The PSLP 2021 is heavily reliant on the Waterfront proposal to meet its housing needs. This is proposed to provide 1,070 dwellings over the plan period, with supporting infrastructure, including a new primary school. This site is included in the 2020 SHLAA and is considered through the analysis presented in Appendix 1.

3.7 The PSLP 2021 notes that it will be developed at a reasonably high density. The Council's 2018/19 Masterplan for the Town Centre and Waterfront indicates that the western part of the Waterfront area (to be developed during the plan period) corresponding with Parcel K5 extends to 13.75 ha, representing a gross development density of 78 dwellings per hectare.

3.8 This is significantly above the typical development density achieved in respect of family housing led development schemes, the demand and market for which is untested. It is also unproven that there would be developer interest in developing the site at such a density particularly since this represents a deviation from densities typically achieved on family housing led residential sites (usually ranging from 30 to 40 dwellings per hectare). The ability to achieve such an uplift in density and the market demand for this requires further evidencing.

3.9 Further there is a general absence of technical evidence to support this proposition at this time. The Council's proposal for the Waterfront is reliant on a high level masterplanning exercise undertaken by AECOM in 2018/19 which provides no supporting technical evidence base to prove the waterfront proposal is achievable.

3.10 The Waterfront site is currently disconnected from the wider highway network and is reliant on the delivery of the Western Link to come forward for development – comments on the Western Link are provided as part of Paper 1 of Peel's submission. These highlight the significant risk to the delivery of the Western Link posed by the strategy being pursued through the Local Plan with precious little opportunity for developments to financially contribute to its delivery due to significant viability challenges affecting the sites upon which the PSLP 2021 is reliant.

3.11 The Western Link is subject to a £70m funding gap - this is a critical piece of infrastructure to unlock the Local Plan and yet the Council is pursuing a strategy which does not support the very sites which can help address the funding gap. That the Council's viability evidence demonstrates that the waterfront allocation is unviable (see Paper 1 section 3) illustrates the perilous position the plan is in. At this point in time, and without a robust and deliverable strategy for the Western Link, and significant funding to cross-subsidise this site, the Waterfront is fundamentally undeliverable.

3.12 There is very little information to underpin the Council's conclusion that reliance on the Waterfront represents a sustainable approach to delivering the Borough's housing needs. No consideration has been given to the site's ecological value, its Agricultural Land Classification or its landscape context for example. The site represents a large previously open and undeveloped area of land and whilst in the urban area, it is of a scale and character which triggers the need to consider such matters. It is insufficient to conclude that it should be developed for housing based on little more than a conclusion that it is not Green Belt. This is an inadequate basis on which to plan for the Borough's development needs.

3.13 At this point, the Council has provided insufficient evidence to demonstrate that:

a) The Warrington Waterfront site is suitable for development and would not give rise to an unacceptable level of adverse harm, to be weighed in the planning balance, in respect of a number of key areas, including ecology, flood risk (noting that the site is located in Flood Zone 3a), agricultural land and highways;

b) The Warrington Waterfront site could be developed at the level assumed given the high density form of development which deviates significantly from standard densities and the absence of a detailed masterplan and delivery strategy.

3.14 The allocation is therefore not justified and Policy MD1 is unsound as a result.

Past delivery from the urban area

3.15 The PSLP 2021 assumes the delivery of an average of 655 dwellings per annum from the urban area (11,785 / 18). This represents the Council's predicted annual yield from a supply of sites which does not require a shift in planning policy to come forward.

3.16 It is noted that sites within the urban area of the Borough have delivered, on average, 554 dwellings per annum over the 13 year period up to 2020 / 21.[7] During this period, 655 dwellings have been delivered on only two occasions in any given year. The urban area will therefore need to deliver on an annual basis some 18% more units than has been achieved over the 13 past years. Even if the first 3 years of this period are discounted and the yield since 2013 only is considered (i.e. post-2008 to 2012 recession), the average annual yield from the urban area has been only 566 units, with an uplift of 16% on this needed to deliver the Local Plan requirement.

3.17 Past delivery from the urban area can provide a helpful reference point to consider whether the supply, as a whole, is likely to deliver at the levels assumed since this is supply which, in policy terms, is otherwise unconstrained and is not dependent on the step change in policy created by the Local Plan. That is to say these sites, or sites of this type, have always been policy compliant and yet in the case of Warrington, the urban area has not historically proven able to deliver development at the rate assumed going forward. To this extent, the prevailing evidence indicates that the level of development

[7] Warrington Council Annual Monitoring Report 2020 Page 15

which Warrington predicts to be provided from the urban area over the next 18 years is significantly higher, on an annual basis, than seen over the historic long term.

3.18 This highlights the need for a very cautious approach to be taken in projecting future yield from the urban area and may support the inclusion of a higher flexibility allowance to mitigate the very clear risk of under-delivery (see Paper 1).

4. Dependency on supply in the Town Centre

4.1 Peel has previously expressed serious significant reservations, through representations to earlier iterations of the draft Plan, about the extent of the Council's reliance on the supply of homes within the Town Centre specifically. Peel is supportive of the principle of broadening the mix of homes and specifically the opportunity offered by such development in attracting a new demographic and improving the resilience of the retail and cultural uses in the centre. Further, developing a residential market in the Town Centre is a key part of the Council's regeneration aspirations for the Town Centre. This aspiration is be commended and is fully supported by Peel.

4.2 However, the Local Plan is concerned with putting in place a strategy to ensure the Borough's housing needs (in a quantitative and qualitative sense) are met over the next 18 years. The extent to which the Town Centre market, and the Council's regeneration aspirations for this location, can help to achieve that over the plan period is a highly relevant question for the purposes of determining the plan's soundness.

4.3 This is not to say the Council should consider diluting its aspirations for the Town Centre but rather a key issue for the Plan is whether there is sufficient certainty regarding the deliverability of the Town Centre plan (and particularly the residential component of it) to place such reliance on it for the purposes of the inclusion of a robust housing trajectory underpinning the Local Plan's satisfying of its housing requirement.

4.4 The previous sections have referenced that the housing trajectory in the current iteration of the draft Plan continues, according to the data available, to rely on the Town Centre area as a significant source of future supply. Previous concerns which identified for example, the infancy of the existing residential market in the Town Centre and the susceptibility of more urban markets to local and macro market conditions, are considered to remain valid. Indeed in reality it is reasonable to argue that they have been further strengthened by emerging evidence of longer-term behavioural shifts in household aspirations arising from the pandemic and market responses which put an even greater emphasis on the need to make reasonable assumptions as to the scale and timing of delivery.

4.5 In this context Turley and John Broadbent Consulting have given detailed consideration to the latest evidence of the scale of need for homes such as those proposed within the Town Centre as well as market sentiment with regards their delivery. This is included as Appendix 2 and the conclusions are summarised in this section.

4.6 Firstly, with reference to section 2 of this report the analysis in Appendix 2 has worked on the basis that the draft Local Plan assumes the delivery of some 4,365 homes within the Town Centre over the plan period. As requested in earlier sections of this report it is imperative that the Council provide further clarification on the make-up and quantum of homes proposed in the Town Centre in order to confidently assess its deliverability and therefore the extent to which it represents a justified and robust component of the supply.

4.7 Taking this level of planned provision it is the case, as the LHNA itself identifies, that this represents a sizeable component of the overall supply, particularly when recognising that the supply is concentrated within a comparatively small geography and on a relatively small number of development sites.

4.8 In this context based on the evidence assembled and presented in Appendix 2 it is strongly considered that the dependency on this source of supply presents a significant risk. Specifically this recognises:

- That the Council's own evidence in the form of the LHNA Update infers a finite need/ demand for smaller homes and specifically flats, which on the basis of evidence presented in the Viability Study as well as the evidence previously published on density to support the 2019 iteration of the Plan, are assumed to make up a substantial proportion of the homes planned for in this area. Drawing on the analysis of the need for different sizes of homes presented in the LHNA it is reasonably concluded that there is unlikely to be a need for more than circa 1,080 flats over the plan period and this could be considerably lower still. This poses a significant challenge to the scale of provision proposed where it is understood that these are intended to service a local need;

- Market insight has highlighted the likely scale of challenges facing developments in the Town Centre, based on current schemes in the pipeline as well as the wider general findings of the Viability Report and its analysis of the deliverability challenges facing the sub-area. Beyond the finite need / demand from potential occupiers this has also highlighted the potential limited nature of investor interest and confidence. Specific reference has been made to the experience of another northern town with aspirations to deliver a town centre community in Stockport. This reinforces the scale of the viability challenge, noting the comparatively slow progress made there even in the context of substantial levels of public sector support and funding. This serves to further raise challenges as to the realism of the pace at which the draft Plan assumes the provision of high-density development in the Town Centre; and

- Where the above findings have reflected longer-term considerations of need/ demand drivers as well as market sentiment it is evidently the case that the pandemic has the potential to have longer impacts on the aspirations of household behaviours and aspirations. Such considerations are important in again understanding the extent to which demand has oriented more strongly to homes able to offer flexibility with regards homeworking and private amenity space, where the importance of both has evidently increased in many households' perceptions.

4.9 On the basis of the above highlighted points of challenge it is considered that it is not reasonable for the Council to assume that over 4,000 homes will be needed or delivered within the Town Centre in the plan period. A more realistic assessment must therefore be made by the Council taking full account of both need and demand evidence.

5. Summary and conclusions

5.1 This Paper has presented a critique of the PSLP 2021's urban land supply for the purposes of informing Peel's overall representation to the Local Plan. It informs its consideration of whether the PSLP 2021 will meet the proper housing needs of the Borough.

5.2 It draws attention to a number of critical deficiencies in the supply upon which the PSLP 2021 is reliant upon, including:

a) that a number of the sites which the Council are reliant upon are either not developable, owing to ownership or technical constraints, or are developable but not at the level assumed by the Council

b) that the allocation of 1,070 residential units at the Waterfront is not justified, with a lack of evidence to demonstrate that this site can be satisfactorily accessed, that it will not give rise to unacceptable harms in relation to a number of disciplines including ecology, landscape and agricultural land particularly and that it is deliverable from a wider utilities and infrastructure point of view

c) that the Waterfront is a suitable and viable location to deliver high density family homes at the level proposed and to the extent that this represents a very significant departure from more typical density levels achieved within family housing developments

e) that the Council is reliant upon a significant uplift in delivery from a source of sites located in the urban area which are otherwise not presently constrained by policy. The assumptions around the annual yield from this supply sites are unjustified in the context of evidence of past rates of delivery

f) that the Town Centre market is unlikely to be able to deliver the number of residential dwellings proposed given the underlying market conditions present in the Town Centre and the extent to which this sector relies on investor appetite and willingness to fund a component of the housing market which does not presently operate in the Borough.

g) that there is a mismatch between the Borough's qualitative housing needs and the types of residential products which the PSLP 2021 will provide given the extent of reliance upon the development of smaller homes and specifically apartments in the Town Centre.

5.3 In combination, these points illustrate that the urban housing land supply is not developable to the level proposed through the PSLP 2021 nor that it will meet the needs of the Borough. The analysis has demonstrated that, to the extent that the sites upon which the PSPL are reliant are known at this stage (given deficiencies in the evidence base) the Council has over-estimated the wider urban yield by at least 3,446 units. More generally, and notwithstanding the above, a consideration of the characteristics of the supply highlights the very high level of risk inherent within the

Council's strategy and the likelihood that, on a cumulative basis, the combination of sites will not deliver at the level assumed.

5.4 The implications of this for the PSLP 2021's soundness and the extent to which corrective action needs to be taken to address soundness are considered in Paper 1.

Appendix 1: Analysis of urban supply

Warrington Borough Council Local Plan SHLAA 2020 – sites analysis

Warrington SHLAA 2020 Site reference	Site name	Brownfield or Greenfield	Ward	Site size	Council assumed yield during the plan period	Council assumed developm ent density (per Ha)	Any constraints acknowledged by the Council	Existing site allocation	Existing use and occupation	Peel Comments	Revised yield during plan period based on Peel analysis	Net difference in Dwellings
1746	Site of former Kwik Save (Skate Academy)	Brownfield	Bewsey and Whitecro ss	0.39ha (developable site area - - 0.39ha)	144	369	Flood Zone 1	Site is located within a Conservation Area.	Existing Use - Indoor Skate Rink (at time of SHLAA)	Neighbours a listed building (pub). Neighbours a 19th Century Monument. Access possible from Academy Street. Application approved for 144 dwellings (2017/31148). SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Currently under construction.	144	0
1029	Land at John St/Winwick Street	Brownfield	Bewsey &	0.84ha	362	Not Stated	Flood Zone 1	Site is located	Existing Use – Derelict Site	Neighbouring a 19th Century Monument.	362	0

			Whitecross	(developable site area – 0.76ha)				within a Conservation Area. Nearby Industrial/Retail uses.	No Active use (at time of SHLAA)	Access appears to be from John Street. Close proximity to Winwick Street (Highly accessible). Application approved for 362 dwellings (2017/31394). Construction underway. Construction company for this development has now gone into administration (as per John Broadbent email- 01/11/2021) SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Currently under construction		
2908	Former Bayleaf PH	Brownfield	Poulton North	1.01ha (developable site area – 0.91ha)	97	Not Stated	Flood Zone 1		Existing Use – Vacant Building No Active use (at time of SHLAA).	Access from Harpers Road. Application for 93 dwellings approved (2016/27896).	0	- 97

										Dispute between no. of dwellings in permission and SHLAA capacity. SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Construction has been completed for 93 dwellings in December 2020. Therefore this cannot be considered as development was completed before the plan period.		
2658	Hawthorne Business Park	Brownfield	Bewsey and Whitecross	1.03ha (developable site area 0.93ha)	46	45	Flood Zone 1		Existing Use - Industrial Estate No Active use (at time of SHLAA).	Access from Hawthorne Street. Application for 46 dwellings approved (2016/29157). SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Construction has been substantially completed for 46 dwellings.	46	0

1090	Beers Building Co	Brownfield	Latchford East	1.75ha (developable site area - 1.57ha)	189	Not Stated	Flood Zone 1		Existing Use – Derelict Site No Active Use (at the time of the SHLAA). Construction has been substantially completed for 189 dwellings.	Access from Station Road. Application for 189 dwellings approved (2018/31871). SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5).	189	0
1752	Former Wilderspool Stadium	Brownfield	Latchford West	1.89ha (developable site area - 1.42ha)	160	84	Flood Zone 2 Close proximity to the railway to the east and industrial/commercial works to the south.		Existing Use – Former Sports Stadium (now vacant) No Active Use (at time of SHLAA)	Access from Fletcher Street (through terraced house/streets) Outline Application for UPTO 160 dwellings approved (2018/33771). SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5).	160	0
2176	Sycamore Lane Community Primary School	Brownfield	Great Sankey South	3ha (developable site area – 1.72ha)	92	Not stated	Flood Zone 1		No Active Use (at time of SHLAA)	Access from Sycamore Lane Application for 92 dwellings approved (2020/36798). SHLAA states - Site is considered suitable, achievable and currently	92	0

										benefits from planning approval. The site is considered deliverable (0-5). Construction is underway.		
0	Grappenhall Heys (Phase 1a)	Brownfield	Grappen hall	2.41 ha (developable site area – 1.8ha)	58	Not Stated	Flood Zone 1		Existing Use – New Town Reserved Land No Active Use (at time of SHLAA) Construction has been undertaken/ completed.	Access from Astor Drive. Application for 58 dwellings approved (2019/36202 and 2018/34167) SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Construction is underway.	58	0
1516	Land off Stretton Rd/Arley Rd	Greenfield	Grappen hall	2.92ha (developable site area – 2.34ha)	71	Not Stated	Flood Zone 1		Existing Use - Agriculture No Active Use (at time of SHLAA). Construction has been undertaken/ completed.	Access from Pepper Street. Application for 71 dwellings approved (2017/31848). SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is	0	-71

										considered deliverable (0-5). Construction has been completed for 71 dwellings in 2020/21. Therefore this cannot be considered as development was completed before the plan period.		
18251	Gemini 16	Greenfield	Westbrook	3.07ha (developable site area – 2.3ha)	79	Not Stated	Flood Zone 1 Contaminated Land Issues. Hazardous Installations Issues.		Existing Use – New Town Reserved Land No Active Use (at time of SHLAA). Construction has been undertaken/ Completed.	Access from Delta Crescent. Application for 79 dwellings approved (2018/33778). SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Construction is underway.	79	0
3331	Land south of Rushgreen Road (East Site)	Greenfield and Brownfield	North & Thelwall	4.29ha (developable site area - 3.22ha)	64	Not Stated	Green Belt Flood Zone 1		Existing Use – Commercial Use No Active Use (at time of SHLAA).	Access from Rushgreen Road. Application for 64 dwellings approved at Appeal (2017/31816)). SHLAA states - Site is considered suitable, achievable and currently	64	0

										benefits from planning approval. The site is considered deliverable (0-5).		
0	Omega Zone 6 (Phase 3)	Brownfield	Great Sankey North and Whittle Hall	4.5ha (developable site area – 3.38ha)	86	Not Stated	Flood Zone 1 Contaminated Land Issues		No Active Use((at time of SHLAA)	Access from Omega Boulevard. Application for 86 dwellings approved (2018/32124 and 2015/26469). SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Construction is substantially complete.	86	0

0	Grappenhall Heys (Phase 1b)	Greenfield	Grappen hall	5.18ha (developable site area – 3.88ha)	114	Not Stated	Flood Zone 1		No Active Use (at time of SHLAA)	Access from Curzon Drive. Application for 114 dwellings approved (2019/36204) SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Unclear if construction is underway.	114	0
1412	Land at Dawson House	Brownfield	Great Sankey & Whittle Hall	5.78ha (developable site area – 5.78ha)	139	Not Stated	Flood Zone 1		No Active Use (at time of SHLAA)	Access from A57. Application for 140 dwellings approved (2011/18949, 2016/29329 and 2016/29330) SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Construction has been completed for 139 dwellings in 2020/21. Therefore this cannot be considered as development was	0	-139

										completed before the plan period.		
0	Omega Zone 6 (Phase 2)	Brownfield	Great Sankey & Whittle Hall	5.87ha (developable site area – 4.4ha)	158	Not Stated	Flood Zone 1 Contaminated Land Issues		No Active Use (at time of SHLAA)	Access from Sophia Drive and Stanhoe Drive. Application for 158 dwellings approved (2017/30837) SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Construction is substantially complete.	158	0
0	Omega Zone 6 (Phase 1)	Brownfield	Great Sankey & Whittle Hall	6.36ha (developable site area – 4.77ha)	200	Not Stated	Flood Zone 1 Contaminated Land Issues		No Active Use (at time of SHLAA)	Access from Sophia Drive and Stanhoe Drive. Application for 200 dwellings approved (2017/29537). SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Construction has been completed for approximately 200 dwellings in 2020/21.	0	-200

										Therefore this cannot be considered as development was completed before the plan period.		
1650	Land at Pewsterspear Green	Greenfield	Appleton	7.54ha (developable site area – 5.65ha)	180	24	Flood Zone 1		Existing Use – New Town Reserved Land No Active Use (at time of SHLAA)	Access from multiple points. Application for 180 dwellings approved (2018/32672) SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Construction has been completed for approximately 180 dwellings in 2020/21. Therefore this cannot be considered as development was completed before the plan period.	0	-180
0	Lingley Mere	Brownfield	Great Sankey North & Whitle Hall	7.6ha (developable site area – 6.84ha)	208	Not Stated	Flood Zone 1 Contaminated Land Issues		No Active Use (at time of SHLAA)	Access from Omega Boulevard. Application for 208 dwellings approved (2018/32061)	0	-208

										SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Construction has been completed for approximately 208 dwellings in 2020/21. Therefore this cannot be considered as development was completed before the plan period.		
1643	Former Police Training Centre	Brownfield	Poulton South	8.81ha (developable site area – 8.81ha)	220	25	Flood Zone 1		Existing Use – Redundant Institution No Active Use (at time of SHLAA)	Access from more than one point (inc. Greenway) Application for up to 220 dwellings approved at planning committee (2013/22541). SHLAA states - Site is considered suitable, achievable and currently benefits from planning approval. The site is considered deliverable (0-5). Construction has been completed for approximately 220	0	-220

										dwellings in 2020/21. Therefore this cannot be considered as development was completed before the plan period.		
1715	Spectra Building & Drivetime Golf Range	Brownfield	Bewsey & Whitecross	16.65ha (developable site area – 12.48ha)	513	Not Stated	Flood Zone 3b The site has limited access. Further access points to/through the site are required if development is to occur. Recent planning application (2017/29897) approved provide new bridge and access road into southern end of the site. Hazardous Installation Zone Comments		Existing Use – Commercial No Active Use (at time of SHLAA)	Access from multiple points. Permission was granted in Aug 2021 (2019/35711) for 513 dwellings. The site constraints may impact development interest and viability. Wooded area on the site. The site is however being promoted for development and funding has been secured for Phase 1 of the Warrington Water. SHLAA states - Site is considered suitable, available and achieveable but does not currently benefit from a planning approval for residential development (at time of SHLAA).	513	0

										It would appear the site has been partially cleared/prepared for development.		
1646	Grappenhall Heys (Remainder)	Greenfield	Grappen hall	17.28ha (developable site area – 12.96ha)	228	20	Flood Zone 1		Existing Use – New Town Reserved Land No Active Use (at time of SHLAA).	Access from a new roundabout at Curzon Drive with further potential linkage. SHLAA states - Site is considered suitable, available and achievable but currently benefit from an outline planning approval for residential development (2017/29929). Reserved Matters approved at committee (2021/38524).	228	0
2135	Omega (Remainder)	Brownfield	Great Sankey North & Whittle Hall	18.87ha (developable site area – 14.15ha)	656	28	Flood Zone 1		Existing Use – Vacant Land No Active Use (at time of SHLAA)	Access from Omega Boulevard. Outline approval granted (2015/26469). SHLAA states - Site is considered suitable, available and achievable but currently benefit from an outline planning approval for residential development. Construction is underway.	656	0

308	Land at Appleton Cross	Greenfield	Grappen hall	22ha (developable site area – 14ha)	370	17	Flood Zone 1 Hazardous Installations Issues		Existing Use – New Town Reserved Land. No Active Use (at time of SHLAA) Construction has been undertaken/ completed	Access from Dipping Brook Avenue. Planning Permission for 370 dwelling (2019/35105). SHLAA states - Site is considered suitable, available and achievable but currently benefit from an outline planning approval for residential development. The site is therefore considered to be deliverable (0-5). Construction is underway.	370	0
2472	Former Cabinet Works and Vicinity	Brownfield	Bewsey & Whitecro ss	0.28ha (developable site area – 0.28ha)	36		Flood Zone 1 Ground Conditions Issues – No known issues in this locality. Although part of the site is a graveyard and would evidently be excluded from the net developable area.	Site is located within a Conservation Area.	Existing Use – Vacant Land No Active Use (at time of SHLAA)	Neighbours a listed building. Due to the constraints on the site, the site is likely unviable to developers. SHLAA states - Site is considered suitable, available and achievable but does not currently benefit from a planning approval for residential development and requires sensitive design solution. The site is therefore considered	0	-18

										developable in the medium term.		
1719	Furnish with Flair Site	Brownfield	Latchford West	0.31ha (developable site area – 0.31ha)	40	Not Stated	Flood Zone 2		Existing Use / Active Use – Car Park and Retail/Commercial. Established Use.	Site is easily accessible due to location. Site was granted Outline planning permission for development of land as an automated car wash facility (2021/38435). As a result of the above permission, it is unlikely the site will be wholly available in the near future. The site also has established retail units. SHLAA states - Site is considered suitable, likely to become available and achievable but does not benefit from approval for residential development.	0	-20
2480	Former K&N Works	Brownfield	Bewsey & Whitecross	0.32ha (developable site area – 0.32ha)	41	Not Stated	Flood Zone 1		Existing Use – Commercial No Active Use (at time of SHLAA).	Site is easily accessible due to location. Site has not been brought forward by land owner – there is no indication that	0	-41

										owner/established use would vacate the site. Appears to have established commercial uses/car parking. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.		
2478	General Street Metal Works	Brownfield	Fairfeld and Howley	0.34ha (developable site area – 0.34ha)	44	44	Flood Zone 1		Existing Use – Scrap Metal Merchants Active Use (at time of SHLAA)	The site has an established use. There is no clear indication from the SHLAA to suggest that the land will become available. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.	0	-44
26722	Railway Sidings/Depot	Brownfield	Bewsey & Whitecross	0.35ha (developable site area – 0.35ha)	86	Not Stated	Flood Zone 3a Contaminated Land Issues Surrounding Land Uses – Mixture of		Active Use (at time of SHLAA).	The site has an established use. Locally Listed Railway Building within Curtilage of Site.	0	-86

							uses in waterfront and gateway location. TC location should influence the design and layout of any future design solution.			Due to the heritage interest and the surrounding uses, it is unlikely the site could develop 86 dwellings. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.		
2681	Land bounded by Haydock Street, Ashton Street and John Street	Brownfield	Bewsey & Whitecross	0.38ha (developable site area – 0.38ha)	49	Not Stated	Flood Zone 1 Surrounding Land Issues – Proximity to industrial estate units may require suitable buffers unless those sites are also included within wider regeneration of this area (as proposed in Stadium Quarter Masterplan) Ownership/Tenancy Issues – Multiple landholdings/leaseholdings		Existing Use – Commercial Active Use (at time of SHLAA)	Nearby Existing Industrial Uses – Suitable for ResI? Multiple Land Owners Established industrial uses nearby. Part of the Site includes a Listed Buildings – Boultings. Part of the site includes a designated monument. As a result of the reasons set out above, it is likely that this site is not suitable or developable for 49 units. SHLAA states - Site is considered suitable, likely to become available and achievable	0	-49

										but does not currently benefit from a planning approval for residential development. The site is therefore considered developable from the medium term onwards.		
3474	Blackburn Arms PH	Brownfield	Orford	0.5ha (developable site area – 0.45ha)	58	Not Stated	Ownership/Tenancy Issues - Yes		Existing Use – Former Public House No Active Use (at time of SHLAA)	Application for 52 affordable units refused and refused at appeal. Above number different to SHLAA. Public House is considered an Asset of Community Value (2019/35774). Significant public opposition. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.	0	-58
1108	Edwards Cheshire	Brownfield	Fairfeld and Howley	0.57ha (developable site area – 0.57ha)	76	Not Stated	Flood Zone 1		Existing Use – Derelict Site No Active Use (at time of SHLAA.).	Application 2007/ 10238 approved reserved matters in 2007 for 76 dwellings. Site has remained undeveloped since	76	0

										permission granted in 2007. Construction never completed. It is not clear why construction did not occur. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.		
0	Former Mr Smiths Site	Brownfield	Bewsey & Whitecross	0.8ha (developable site area 0.71ha)	198	Not Stated	Flood Zone 3a Contaminated Land Issues Surrounding Land Issues – Mixture of uses in waterfront and gateway location. TC/Heritage location should influence the design and layout of any future design solution.		Existing Use – Car Park Active Use (at time of SHLAA)	Nearby Existing Industrial Uses – Suitable for ResI? Given flood zone location and noted issues 198 dwellings is high. Site is located in close to designated monuments. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.	99	-99
0	New Town House	Brownfield	Bewsey &	0.82ha	202	Not Stated	Flood Zone 1		Existing Use – Offices	Site encompasses a designated monument.	202	0

			Whitecross	(developable site area 0.73ha)			Contaminated Land Issues – Yes Gateway position in commercial setting – expected landmark apartment buildings as design solution.		No Active Use (at time of SHLAA)	SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development		
0	Go Outdoors	Brownfield	Bewsey & Whitecross	0.88ha (developable site area - 0.79ha)	102	Not Stated	Flood Zone 3a Contaminated Land Issues Surrounding Land Issues – Mixture of uses in waterfront and gateway location. TC/Heritage location should influence the design and layout of any future design solution.		Existing Use – Retail Active Use (at time of SHLAA) Site is located in close to designated monuments	Nearby Existing Industrial Uses – Suitable for ResI? Established Retail Use – Go Outdoor (Retail) SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.	0	
2481	Land Enclosed by Hopwood Street, School Brow and Crossley Street	Brownfield	Bewsey & Whitecross	0.93ha (developable site area – 0.83ha)	108	Not Stated	Flood Zone 1		Existing Use – Retail Active Use (at time of SHLAA)	Established Retail Use – Farmfoods and Car Park. There is no indication set out in the SHLAA that the established businesses would be willing to relocate. Industrial Uses to the Rear.	0	-108

										SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.		
0	Warrington Civils & Lintels	Brownfield	Bewsey & Whitecross	1.13ha (developable site area – 1.01ha)	132	Not Stated	Flood Zone 3a Contaminated Land Issues – Yes Surrounding Land Issues – Mixture of uses in waterfront and gateway location. TC/Heritage location should be influence the design and layout of any future design solution.		Existing Use – Commercial Active Use (at time of SHLAA) Site is located in close to designated monuments	Established Commercial Use Given the constraints set out, it is unlikely that 132 dwellings could be achieved within the location. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.	0	-132
1401	Land at Winwick Street	Brownfield	Bewsey & Whitecross	1.18ha (developable site area - 1.06ha)	292	Not Stated	Flood Zone 1 Surrounding Land Issues – Interaction with other uses now on the site (office/higher education uses).		Existing Use – Mixed Use Active Use (at time of SHLAA).	Previous industrial uses – contamination likely. Application submitted for outline application for mixed use development including up to 550 dwellings (12 storey).	292	0

										(2019/35548) – **This application remains ongoing.**		
3568	Warrington Borough Transport Depot	Brownfield	Bewsey & Whitecross	1.31ha (developable site area -	153	Not Stated			Existing Use – Bus Depot Active Use (at time of SHLAA)	Due to the existing use, there is no indication that the existing use would be able to relocate. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.	0	-153
1710	Dalton Bank Council Depot	Brownfield	Fairfield & Howley	1.45ha (developable site area – 1.30ha)	65	Not Stated	Flood Zone 1		Existing Use – Industrial Active Use (at time of SHLAA)	Due to the existing use, there is no indication that the existing use would be able to relocate. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.	0	-65
0	Land at Scotland Road	Brownfield	Bewsey & Whitecross	1.64ha (developable site area – 1.48ha)	405	Not Stated			Existing Use – Retail Active Use (at time of SHLAA)	Established Retail Use Site seems relatively small for 400 dwellings Site encompasses designated monuments.	0	-405

										There is no indication set out in the SHLAA that the established businesses would be willing to relocate. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.		
2182	PDC Irwell Road	Brownfield	Latchford West	1.87ha (developable site area - 1.68ha)	50	Not Stated	Flood Zone 2		Existing Use – Vacant council offices and disused playing field No Active Use (at time of the SHLAA)	SHLAA states - The site does not currently benefit from planning permission the site has been identified to be brought forward for residential use by the Council's newly created Housing Company.	50	0
2720	Radley Cottage	Brownfield	Poplars & Hulme	1.87ha (developable site area - 1.68ha)	42	Not Stated	Flood Zone 1		Existing Use – Vacant Land Active Use (at time of SHLAA)	Site is located next to Radley Common. SHLAA states -Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development and is unlikely to come forward without access improvements being provided by the wider Peel Hall Site.	42	42

2179	Land adj to Cherry Tree Primary School	Greenfield	Lymm South	1.90ha (developable site area - 1.43ha)	42	Not Stated	Flood Zone 1 Ownership/Tenancy Issues – Yes		Existing Use – Paddocks Active Use (at time of SHLAA)	SHLAA states - The site does not currently benefit from planning permission the site has been identified to be brought forward for residential use by the Council's newly created Housing Company.	42	0
2471	Pinners Brow Retail Park	Brownfield	Bewsey & Whitecross	1.98ha (developable site area – 1.49ha)	193	Not Stated	Flood Zone 1		Existing Use – Retail Park Active Use (at time of SHLAA)	Established Retail Uses (Large Stores) There is no indication in the SHLAA that the current established uses would be willing to move from the site. The land has not been brought forward by the owner. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.	0	-193
0	Causeway Park	Brownfield	Latchford West	2.37ha (developable site area – 1.7ha)	59	Not Stated	Flood Zone 2 Contaminated Land Issues – Yes		Existing Use – Employment Active Use (at time of SHLAA)	Established Employment Uses Site has notable constraints as described. Due to these constraints	0	-59

							Ownership/Tenancy issues – Multiple leaseholdings			it is unlikely that the site could be developed to the outlined capacity. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.		
1543	Knutsford Road	Brownfield	Latchford East	2.48ha (developable site area – 1.86ha)	93	Not Stated	Flood Zone 2		Existing Use – Mixed Use Active Use (at time of SHLAA)	Established Uses Large Wooded Area within the site. Due to the wooded area on the site, it is unlikely the site would be developed to the outlined capacity without notable tree loss.	0	-93
1642	Bewsey Old Hall	Greenfield and Brownfield	Chapelford & Old Hall	3.03ha (developable site area – 3.03ha)	55	Not Stated	Flood Zone 1		Existing Use – Vacant Building and Park Land No Active Use (at time of SHLAA)	Planning Permission granted at appeal for conversion of Bewsey Old Hall into apartments (2007/10550 and APP/M0655/A/08/2092759/NWF). Refused by WBC. 7 Apartments inside the Hall appear to have been constructed, unlike the	7	-48

										48 additional apartments. SHLAA states potential capacity at 55 (7 of these dwellings have already been developed. Significant areas of the area are covered by TPOs. Would result in tree loss and would require improvements to access. Listed Buildings – which will be severely impacted by the removal of trees. Development would impact the setting of a Listed building Narrow access to site. Close proximity to designated Monument. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.		
2482	Wharf Industrial Estate	Brownfield	Fairfield & Howley	4.86ha	127	Not Stated	Flood Zone 3a Surrounding Land Issues – Site		Existing Use – Industrial Estate	Established Industrial Uses. There is no indication that the existing uses would be	0	-127

				(developable site area – 3.64ha)			adjacent to an established residential area to the north and the River Mersey to the south and east. Proximity to retail park to the west not considered to be an issue. Ownership/Tenancy Issues – Yes		Active Use (at time of SHLAA)	willing to vacate the site prior to the end of the respective leases. However, site has been brought forward by the owner. Site constraints such as those outlined could lead to a drop in capacity and viability. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.		
3567	Dallam Lane (West Side)	Brownfield	Bewsey & Whitecross	8ha (developable site area – 605ha)	211	Not Stated	Flood Zone 1 Surrounding Land Issues – West coast main line lies immediately to west of site and commercial uses to east and south. Ownership/Tenancy Issues - Yes		Existing Use – Commercial Active Use (at time of SHLAA)	Established Uses Site is in close proximity to a designated monument. There is no indication that the existing uses would be willing to vacate the site prior to the end of the respective leases. The site has not been brought forward by the owner. Site constraints such as those outlined could lead to a drop in capacity and viability.	0	-211

										SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.		
1541	Arpley Meadows (mid parcel immediately abutting the west coast mainline) (Masterplan Parcel K7)	Brownfield	Bewsey & Whitecross	16.12ha (developable site area – 12.09ha)	604	Not Stated	Flood Zone 3b Ground Conditions Issues – No known issues but further work needed to clarify ground conditions given historical uses as dredging grounds Site Access Issues – Site Access is constrained and difficult to overcome owing to the river and railway. Further evidence required. Surrounding Land Issues – Heavy industrial works directly to the north. West Coast main line forms the sites eastern boundary. Noise and		No Active Use (at time of SHLAA)	Site issues as outlined. Infrastructure required to overcome these constraints. Further info is required in regard to ground conditions, access and land uses. It is possible without further investigation development may not be viable. SHLAA states - Site is considered suitable but will only be achievable through delivery of infrastructure to overcome existing constraints (expected by 2025). Residential development is being promoted by the Council, who now own the site.	0	-604

							amenity buffers would be required. Infrastructure Issues - Yes					
1633	Arpley Meadows (most western parcel) (Masterplan Parcel K5)	Brownfield	Bewsey & Whitecross	19.46ha (developable site area – 14.6ha)	729	Not Stated	Flood Zone 3a Ground Conditions Issues – No known issues but further work needed to clarify ground conditions given historical use as a dredging grounds. Site Access Issues – Existing access is in place but unsure what quantum of development this could support. Surrounding Land Issues – Former active landfill to the south west. However, it is no longer operational and is in the process of being restored. Infrastructure – Yes		Existing Use – Vacant land No Active Use (at time of SHLAA).	Site issues as outlined. Infrastructure required to overcome these constraints. Further info is required in regard to ground conditions, access and land uses. It is possible without further investigation development may not be viable. SHLAA states – site is considered suitable but development is currently constrained until essential infrastructure is delivered. Residential development is being promoted by the land owner and the Council through the publication of the Town Centre South Strategic Master.	0	-729

1506	Peel Hall	Greenfield	Poplars & Hulme	59.45ha (developable site area – 44.58ha)	1200	Not Stated	Flood Zone 1 Site Access Issues – A detailed design solution needs to be provided to demonstrate how the site can be accessed. Hazardous Installations Issues – Yes		Existing Use – Vacant Land No Active Use (at time of SHLAA).	Application refused by council 2016/28492. Appeal upheld by the SoS, before this was quashed by the High Court. Public Inquiry remains ongoing. SHLAA states - Site is considered suitable, likely to become available and achievable but does not currently benefit from planning approval for residential development.	1200	0

Total Dwellings (as defined by Warrington Borough Council)	**9890**
Total Dwellings (as defined by Peel)	**5391**

Appendix 2: Need and market demand for town centre residential development

As with the previous iteration of the draft Local Plan it is understood that the proposed provision of new homes in the Town Centre represents a substantial contribution to the overall planned supply.

Representations previously submitted by Peel raised concerns as to the realism of the scale and required pace of delivery of new homes within this location. This recognised the infancy of the existing residential market in the Town Centre and the susceptibility of more urban markets to local and macro market conditions. It is considered that these previous concerns remain valid and in reality have been further strengthened by emerging evidence of longer-term behavioural shifts in household aspirations arising from the pandemic and market responses which put an even greater emphasis on the need to make reasonable assumptions as to the scale and timing of delivery.

The analysis in this appendix builds upon evidence previously submitted but also integrates the views of John Broadbent Consulting who have been commissioned by Peel to provide current market insight with regards the Warrington town centre market recognising their market knowledge and experience of other comparable northern centres.

Understanding the proposed supply of homes in the Town Centre

The recently prepared Town Centre Masterplan articulates the vision for the Town Centre with the addition of the Waterfront area. This has been prepared separately to the Local Plan and covers a longer time period out to 2040, but envisages the delivery of 8,000 new homes within the area. In terms of the type of housing envisaged, it identifies that:

> *"Residential developments in the Town Centre and Waterfront will be to a high density – in the form of town houses and apartments. The intention is to achieve residential densities of 240 units per hectare in the heart of the Town Centre – producing compact and dense urban core to the Town."*[8]

The Masterplan does not provide a clear breakdown as to how this density will be achieved, but it is reasonable to infer that it will require apartments and flats to make up a substantial proportion of the total supply envisaged, on the basis of the density and the descriptions associated with key development areas within its content. The Stadium Quarter, for example, is described as a *'new high density land mark, mixed user residential and business district located in the heart of Warrington'.* This includes the Winwick Road (West) '*high density residential*' scheme, John Street – which is a permissioned residential development (362 homes) – and Pinners Brow, described as a '*new residential / commercial area*'[9].

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[8] 2020 Warrington Town Centre Masterplan (2020), Warrington Means Business Warrington & Co, page 24

[9] *Ibid*, pages 46 and 47

The housing trajectory presented in the draft Plan offers only a limited breakdown, hindering any attempt to identify the supply that is assumed in the area specifically covered by the Masterplan.

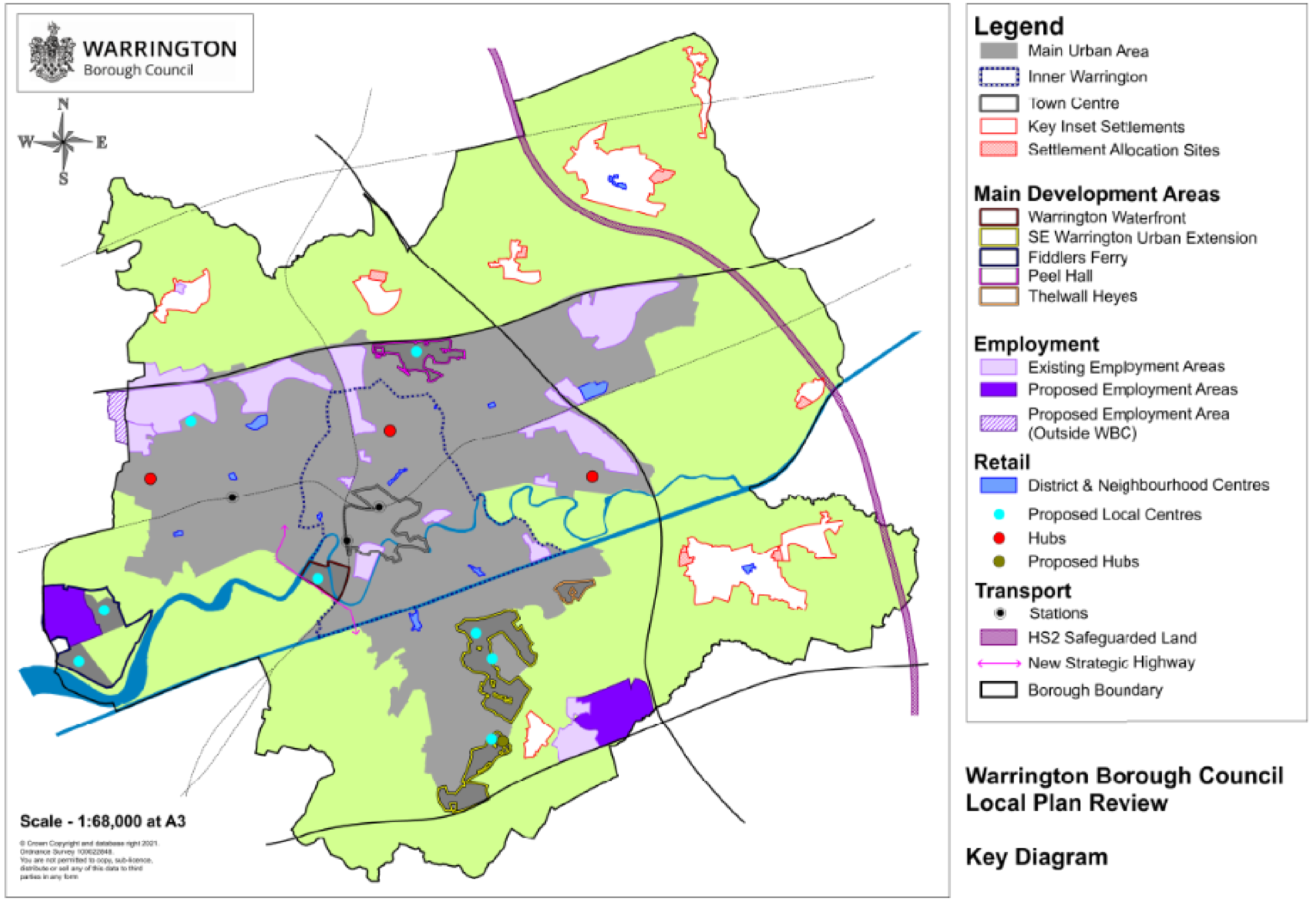
It does isolate the Waterfront area as a distinct component of the supply, identifying that circa 1,070 homes will come forward in this area over the plan period[10]. It is apparent from the evidence presented in the Viability Study that the Waterfront area is anticipated to accommodate a broad mix of homes, which arguably distinguishes itself from the Town Centre component of the Masterplan.[11] It is of note that where these homes were to be netted off the 8,000 homes identified in the Masterplan, this would suggest a residual of just under 7,000 homes anticipated to be delivered in the Town Centre as defined by the Masterplan to 2040.

Other components of the Local Plan evidence base include reference to the Town Centre as a self-contained geography. Specifically, both the Viability Study and the Transport Testing Model Report include maps adapted from the Local Plan, which show a more closely defined Town Centre geography. The Plan from the latter study is replicated overleaf and shows the distinction between the Waterfront and the Town Centre, with both set in the context of the Inner Urban Area and the Warrington Urban Area in its entirety.

[10] Updated Proposed Submission Version Local Plan (2021), Housing Trajectory page 271

[11] Warrington Local Plan Viability Assessment (2021), Cushman & Wakefield, paragraph 7.48 confirms that 1-bed and 2-bed flats make up 25% of the mix with 55% of homes intended to be 3+ bedroom houses.

Figure 2.1 Local Plan Areas for Growth



Source: Replicated Figure 3-1 from the Transport Model Testing of the WBC Local Plan report (July 2021)

The Transport Report provides a breakdown of supply by spatial area, presenting this at Table 3-2 of the document. Specifically this identifies that over the plan period the Town Centre is anticipated to accommodate 4,365 homes. This represents a significant level of new housing, where proportionately it makes up approximately 37% of the total provision proposed in the Urban Area. This suggests a significant concentration of supply in what is evidently a relatively small area.

It is evident that the Council has acknowledged the importance of accounting for housing need in its consideration of the different geographic components of the housing market across the borough. The Local Housing Need Assessment Update (LHNA Update)[12] identifies a series of 'sub-areas', which whilst not defined visually includes one labelled as the Town Centre. This also appears to affirm the dependency of the Plan on the Town Centre as a source of housing supply, stating in the context of the land supply in this sub-area that it *'constitutes a large minority of total supply in the Borough. While it constitutes only 12% of sites, these are forecast to generate around 42% of all new homes over the Plan period.'*[13]

In its consideration of the Town Centre sub-area, the LHNA identifies its current role within the wider housing market of the borough as *'a place where households on modest means are able to access low cost market homes either for rent or for purchase'*[14]. It does proceed to suggest that there is some evidence of higher average property values which suggests that *'it is a place where higher earning people live to take advantage of this more urban environment and access higher paid employment'*[15], but also confirms that *'completions data over the period 2010-20 indicates a clear bias towards smaller dwellings and flats.'*[16]

Indeed in considering the potential composition of the proposed supply in the Town Centre, the Viability Study provides an important reference point within the evidence base. This confirms with regards its '*town centre typologies*' an assumption that *'all schemes will comprise flatted development across a mix of 1 and 2 bed units'*[17]. This notably accords with the evidence published alongside the 2019 iteration of the draft Plan which included a trajectory for each of the Town Centre Masterplan character areas establishing the anticipated density of residential development on individual parcels. This appears to suggest that across the Town Centre areas over 3,200 homes were classified as either 'high density' (140 dph) or 'very high density' (275 dph)[18], where it is reasonable to assume flats would dominate the homes anticipated to be delivered.

This accords with the Masterplan which confirms that residential developments in the Town Centre and Waterfront will be to a 'high density', albeit as noted above reference is made to townhouses as well as apartments as making up the majority of the proposed mix[19]. The inferred diversity of a mix beyond apartments is, however, assumed to at least partially reflect the Masterplan's larger geographic definition which includes areas such as the 'Southern Gateway' and as noted above Warrington Waterfront, where the Viability Study acknowledges

[12] Warrington Local Housing Needs Assessment Update (August 2021), GL Hearn
[13] *Ibid*, paragraph 9.50
[14] *Ibid*, paragraph 9.51
[15] *Ibid*, paragraph 9.52
[16] *Ibid*, paragraph 9.53
[17] Warrington Local Plan Viability Assessment (2021), Cushman & Wakefield, paragraph 7.23
[18] Urban Capacity Assessment Appendix 2 Housing and Employment Trajectory (March 2019)
[19] 2020 Warrington Town Centre Masterplan (2020), Warrington Means Business Warrington & Co, section 7

that the latter will provide a broader housing mix including family sized homes, with this also reflected in a broader mix of assumed densities in the Council's 2019 trajectory.

Where the draft Plan is relatively opaque in explaining how the proposed supply is disaggregated within the broadly defined 'Wider Urban Area', the above implies that a significant proportion is concentrated in the Town Centre. Similarly it is considered reasonable to assume that of this supply of some 4,365 homes, a significant proportion are likely to be flats.

As this appendix explores, whilst the evidence base recognises the distinct nature of the sub-area and the demand for housing therein, it is not clear how the Council has taken this evidence into account to moderate or influence its expectations as to the timing or scale of the supply proposed in the draft Plan.

Understanding the need for town centre living in Warrington

Longer-term demographic drivers of need

The Council's Town Centre Masterplan confirms that the homes proposed to be delivered will provide *'new homes for local people'*[20], the inference being that these new homes will be responding to a locally generated need and demand.

The Council's LHNA Update uses projections of future household and population growth to calculate the need for different sizes of home based on household characteristics and current occupancy profiles. It presents two different modelled outputs, the first using local occupancy data which it observes will to an extent reflect the role and function of the borough. The second uses regional occupancy rates instead, and is described as offering the opportunity to help to establish any particular gaps (or relative surpluses) of different sizes/tenures of homes when considered in the context of the North West region as a whole. The outputs of the two models are closely comparable, with more notable differences apparent for the affordable housing (rented) outputs which in the local model are informed by the housing register.

The LHNA draws upon the outputs of both models to make recommendations on a suitable mix of housing for the borough, summarised at Table 2.1.

Table 2.1 Suggested mix of housing by size and tenure

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

Source: 2021 LHNA, Page 161

It is apparent in looking at the modelled need for market housing that the need is heavily oriented towards properties with three or more bedrooms, which make up 65% of the total need. It is notable that only 5% of market need is for homes with one bedroom.

[20] 2020 Warrington Town Centre Masterplan (2020), Warrington Means Business Warrington & Co, page 24

At a headline level, this would suggest – when applied to the level of need identified in the draft Plan[21] and discounting 25% of homes assumed to be affordable housing, reasonably interpreting the emerging policy[22] – a need for circa 3,640 market homes with one or two bedrooms. At face value, this is lower than the overall supply proposed in the Town Centre, where as noted above this is likely to be predominantly smaller homes. As a result the evidence presented in the LHNA serves to challenge the extent to which there is an evidenced 'need' for the scale of new homes of the type proposed in the Town Centre.

It is recognised in this context that the LHNA suggests, with regards to affordable housing, a different profile of need which is more oriented towards smaller properties, particularly for affordable (rented) housing which is strongly influenced by policies for letting homes of this tenure. Whilst a proportion of the homes in the Town Centre / Waterfront could be affordable homes, it is important to recognise that in line with national policy these will need to be integrated and dispersed more widely as part of mixed-tenure developments and not concentrated in a single town centre location. They will therefore make a contribution to the supply but the onus regards the deliverability of new housing will need to be on the provision of a deliverable supply of market homes in the location.

In reality, where the above has considered need for all forms of smaller housing the majority of the supply in the Town Centre and Waterfront areas will likely be flats. It is therefore important to understand in more detail the extent to which demand for smaller sizes of property is likely to manifest into a need for this specific type of property.

While the LHNA Update does not include a proportionate split by type (i.e. flats / houses) it does consider the issue and rightly recognises in the sub-section titled "Flats vs. Houses" that:

> *"Although there are some 1-bedroom houses and 3-bedroom flats, it is considered that the key discussion on built-form will be for 2-bedroom accommodation"*[23]

Significantly, on the basis of the arguments it presents and specifically in its consideration of the current profile of housing in Warrington, it is clear to conclude that *'this would point to the majority of 2-bedroom homes in the future also being houses',* such that its *'analysis would suggest that most 2-bedroom houses should be built as houses (or bungalows) rather than flats'*[24].

Whilst the LHNA Update does not proceed to build on its analysis by quantifying the proportion of housing need that relates to flats, on the basis of the above conclusion and in recognising the 'market mix' of housing specifically as shown in Table 2.1 the outcome is that the LHNA Update infers a very modest demand for flats.

Using the information presented in the LHNA Update, and again – for simplicity – the level of need identified in the draft Plan, it is possible to make indicative estimates of the scale of

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[21] 816 homes per annum or 14,688 homes over the 17 year plan period (2021-38)

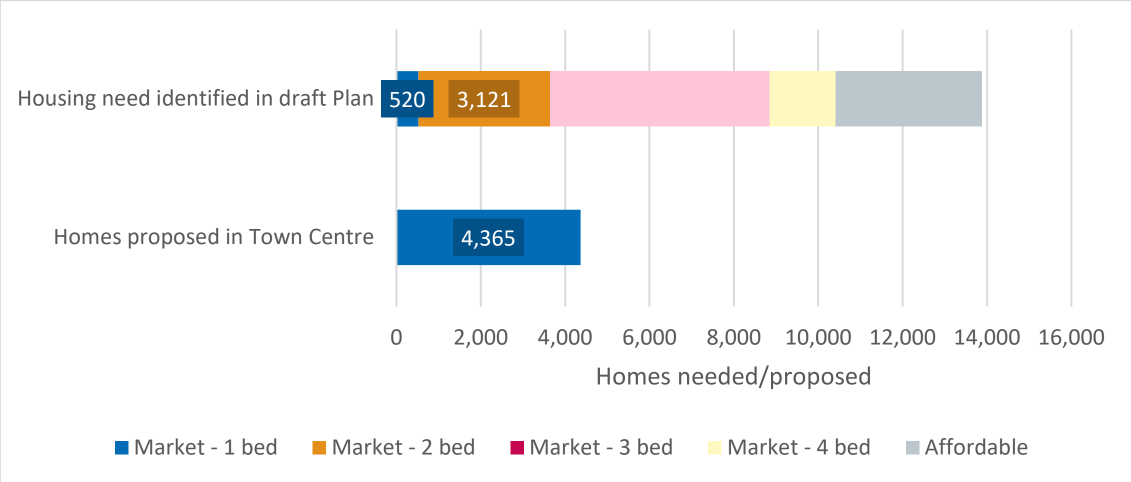
[22] Policy DEV2 requires 20% affordable housing provision within inner Warrington and 30% elsewhere in the Borough and on all greenfield sites irrespective of location. Affordable housing is also only required on sites of 10 dwellings or more. The use of 25% is considered reasonable in this context, albeit a lower proportion would suggest a higher number of market homes being provided overall but would make a more modest difference in calculating the need for flats in this section where this is a small proportion of overall stock.

[23] *Ibid*, paragraph 9.113

[24] *Ibid*, paragraph 9.115

demand for flats. Initially in this context it is useful to compare the breakdown of the need calculated in the LHNA for market houses of different sizes and compare this with the overall level of provision proposed in the town centre. This is shown at Figure 2.2. In identifying the number of market homes this again assumes that 25% of the total homes provided for through the Plan are affordable, reflecting the Council's stated policy objective in this regard[25].

Figure 2.2 Contrasting market need by size of home with the number of homes proposed in the Town Centre



Source: GL Hearn; Warrington Borough Council; Turley analysis

In considering the breakdown of homes by size presented at Figure 2.2 it can be identified where all 1-bedroom properties are flats that this suggests a need for only 520 market 1-bedroom flats over the plan period.

The LHNA's conclusion, noted above, that the demand for 2-bedroom properties will be almost exclusively houses would suggest that there will be only a very limited demand for flats on the basis of this literal interpretation. This would appear to represent a significant challenge to the assumption that over 4,000 homes, which as noted above are anticipated to be in the majority flats, will be needed over the plan period in the Town Centre.

It is, however, considered reasonable to assume that a proportion of new flats would contain more than one bedroom. If it was assumed that the current proportion of 2-bedroom homes across all tenures are flats (18%)[26] and noting these represent 30% of the assessed need for market housing, this would only increase implied need for market flats to 1,082. This assumes no 3+ bedroom homes are flats, but it is noted that where the proportion of 2-bedroom owner-occupier homes which are flats currently was used (7%) the need would fall to less than 740 homes. These levels of need still it is clear fall significantly short of the quantum of homes proposed in the Town Centre.

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[25] Development Options and Site Assessment Technical Report (September 2021) It is noted at paragraph 5.20 that the Council confirms that it is *'assuming that its affordable housing policy will deliver around 25% of housing completions as affordable from eligible market housing led developments.'*

[26] Table 79 of the LHNA identifies that across all tenures only 18% of 2-bedroom homes in Warrington are flats with the proportion falling to 7% when just looking at owner-occupier stock.

The LHNA Update therefore strongly indicates that there will be a finite and lower level of need and demand for market housing of the nature envisaged within the supply located in the Town Centre. This at the very least poses a significant risk as to the likely number of sales which will be able to be sustained and supported, a point considered in more detail drawing on direct market evidence below. It is important to note in this context that if the demand is for houses, including smaller houses more suited to the urban location, as opposed to flats and development does proceed this would have notable consequences in moderating the densities and therefore total numbers of homes which could be delivered.

This appendix proceeds to consider the market drivers of need and demand, but it is of note that the LHNA itself identifies the importance of market cycles and the profile of stock delivered over time. Specifically in considering need within the Town Centre sub-area it observes that:

> *"While the need for smaller homes is beyond doubt (this is supported both by demographic evidence and economic modelling) the recent emphasis on the delivery of smaller homes may have created a shortage of larger dwellings"*[27]

Evidently, where such a demand was to be satisfied in the Town Centre / Waterfront – while debateable as to whether this is appropriate or if other parts of the borough are better placed – this would have a further impact on the density and therefore the number of homes which could be delivered in this area.

The market context

Peel commissioned John Broadbent Consulting Limited to provide an up-to-date assessment of the Town Centre market in Warrington, noting that the LHNA includes the outputs also of a process of market engagement with a specific focus on the Town Centre. In presenting this market insight, as expressed at the start of this section, Peel recognises the potential for the Town Centre to present an opportunity for mixed-use regeneration and brownfield development in support of a wider agenda to achieve an expanded Town Centre residential market. It is similarly recognised that this will in turn be necessary to facilitate a diversification of the Town Centre population to support a wider retail, leisure, business, and community offer than currently exists.

In setting this ambition in the existing market context it is first important to recognise the relatively low base from which the market will need to grow. The LHNA documents that since 2010/11 the Town Centre has only seen 273 completions, with delivery not exceeding more than 58 homes in any one year over this period.

It is also helpful to set the ambition within an overall up-to-date market context. Average UK house prices have continued to rise strongly in 2021, increasing by over 5% in the first 6 months according to the Nationwide Index fuelled in part by the rush in activity prior to the stamp duty deadlines in March and June with continuing elevated levels of demand against the backdrop of limited supply. Affordability limits have become embedded by the stress testing of mortgage affordability at borrower level and the caps on lending at high loan-to-income ratios that were introduced by regulators to ensure responsible lending. This has therefore been weighted and favoured towards the "equity rich" home movers as opposed to first time

[27] *Ibid*, paragraph 9.55

buyers, enabling buyers in the market to be able to operate within the bounds of existing mortgage regulation without stretching their requirements.

It is important in this market context to appreciate, as reflected in the modest scale of development in recent years, that the Town Centre residential market in Warrington remains in its early stages of regeneration. This in part reflects the competition it faces from other larger more established centres where, owing to the economic challenges faced by the pandemic and with the growth in Build to Rent (BTR)/ Private Rental Schemes (PRS), high rise apartments have principally being focused on City Centres that can support the higher rents (£1,000+ / month) necessary to make the schemes financially viable. The potential to capture higher rents in turn is dependent upon the scale and depth of the target occupier market for such properties, generally recognised as being 23 – 35 year olds who are generally in better paid jobs than the average renter; almost 50% having an income over £50,000. Again concentrations of such purchasers tend to be greater in the larger cities.

Further to the above it is observed that BTR providers find themselves competing against other developers, typically those building conventional suburban homes who can afford to pay back development loans over a couple of years, rather than over a lifetime. This is typically true of locations like Warrington, and where new homes are sold privately and mostly to owner occupiers. When combined with the low-yield environment this makes bridging the suburban viability gap particularly challenging for BTR operators.

In the context of the above it is considered that in the early phases of the plan period at least, whilst achievable rents in Warrington remain relatively low it remains unlikely the market will attract significant interest from BTR or PRS operators unless they are able to deliver a more affordable product to attract the household demographics of Warrington or through a greater reliance on Central Government incentives, Homes England or local authority funding schemes to bridge the viability gap.

Where BTR is observed as attracting limited investment demand in Warrington it is recognised that for many years urban markets were driven by the strength of appetite for investment in buy-to-let, with this seen as an attractive and relatively secure way to make money. Low interest rates on savings accounts and a trend towards diversifying pension pots helped to fuel the sector and this came at a time of increased demand for rental properties in addition to rising house prices which when combined pushed up returns for millions of non-professional investors. However property price inflation, the introduction of a series of tax and regulatory changes, including the tapering out of tax relief on mortgage interest + the introduction of 3% stamp duty surcharge on second home purchases has dampened the buy-to-let demand. Last year there were 4.4 million privately rented households, 250,000 less than 2017, showing the rise in the number of investors selling up and leaving the sector. It is not considered likely as a result that investment from this source will be a strong source of market demand for an untested market such as Warrington.

Further to the above in many other towns / cities residential markets have been supported in their growth through the attraction of new high-density Purpose Built Student Accommodation (PBSA). The demand for such housing is considerably more limited in Warrington, however, given that its higher education offer has to date been limited to the Padgate Campus of the University of Chester, albeit with the university having plans to relocate to the town centre next year. The absence of a stronger 'draw' in this context to a rental market has the compound issue of reducing the demand for a strong town centre nightlife, in itself an important component of increasing demand from an urban consumer base.

Indeed the inter-relationship with a town or city centre 'offer' is an important consideration in understanding the scale of likely demand, particularly over the early stages of the plan period. Avoiding single ownership and encouraging interaction between education, retail, leisure and public realm is key to building growing centres with robust economies. The dynamics of the market must be carefully considered in order to future proof regeneration projects and continue to attract inward investment from developers and institutions. Where this is recognised within the Masterplan in terms of its wider ambition this will impact on the pace at which a market demand can be generated where the concurrent delivery of new infrastructure and town centre uses will be required to sustain a stronger appetite from new potential residents. Again where the Masterplan looks to considerably augment the existing offer of the town centre this recognises the limitations of its current facilities.

The above market insight accords with many of the findings of the market engagement exercise undertaken within the LHNA and focussed on the Town Centre market. The analysis presented in section 11 of the LHNA importantly, in this context, observes the following:

- With regard the markets view of the comparative demand for different types of housing it was noted: '*Demand for terraced homes and flats (that tend to be associated with urban living), while significant, attracts the smallest number of positive responses.*'[28]
- Reflecting on the comparative views as to the relative attractiveness of different sub-areas within Warrington critically for the Council's proposed supply of land it is observed: '*Warrington's future land supply is heavily focussed on the Town Centre suggesting a misalignment between where households want to live and where development is proposed.*'
- In considering the views of estate agents it was observed: '*Based on the average number of days that properties remain on the market, demand is greatest for 3 bedroom homes and least for 1 bedroom homes. This distinction has a spatial implication given that dwellings of 1 bedroom dominate the Town Centre market*.'[29]

From an agency perspective, as a result of this picture of market demand and investment appetite, it is considered that the predicted densities for the Town Centre (240 dph) are unduly optimistic. To emphasise as referenced above the LHNA confirms that Warrington town centre has witnessed limited purpose built new build residential development in recent years. Looking to the immediate pipeline, Roebuck Plaza on Academy Street, a modern affordable apartment block of 144 units is shortly due for completion by Torus Homes a registered social landlord targeting "Rent to Buy" from £460/ month, perhaps reflective of the actual market in Warrington. Upon completion, it will be interesting to gauge market demand as this is a significant supply of affordable units into a relatively untested market, and dependent upon

[28] Warrington Local Housing Needs Assessment Update (August 2021), paragraph 11.149
[29] *Ibid,* paragraph 11.169

levels of occupation/ demand and reliance on financial support from Government/ Homes England.

It is important to also observe in looking at the immediate forward pipeline that the other major development in the Town Centre, an 8-storey development of 362 apartments on Winwick Street/ John Street by High Street Group, is understood to have stalled in July 2021 when the contractor Noble Construction fell into administration owing to a payment dispute with developer the High Street Group. As a result, building works have yet to recommence even following reports of a possible alternative contractor being appointed. Whilst the High Street Group have been met with financial difficulties during the pandemic, it is understood they may have experienced institutional funders withdrawing finance and it remains to be seen whether the development will reach completion.

Given the evident susceptibility of town centre schemes in Warrington in recent years to wider market sensitivities and the concerns as to the investment confidence for a significant and rapid scale of development it is the advice from the market agent commissioned that there remains considerable doubt as to the extent to which it is reasonable to assume that the market will deliver the scale of supply anticipated (some 4,365 homes as noted above), in the Town Centre over the plan period.

Potential consequences of the pandemic

The above has sought to take a wider market and longer-term demographic consideration of future market demand and consumer need. It is the case, however, that the events of the last 18 months or so have forced households to reassess their priorities and indeed their aspirations for housing. The long-term behavioural shifts arising are still unknown and where there is evidently a deficiency of supply of all types of tenures and sizes of homes at a national level it is challenging to determine the extent to which changing aspirations will impact on the types of homes delivered in response to demand.

Over a plan period it is, as the previous section identified, reasonable to assume that there will be a demand for homes such as those that are more likely to be delivered in a town centre environment. However, it is similarly the case that a consideration of current market trends would again reinforce that caution must be placed on the scale and origin of these demands.

There has long been national evidence that property size is important to buyers, this having been found to be the most crucial factor to people searching for a property in a nationwide 2019 survey for example[30], but it appears to have only become more so during the pandemic because:

> *"…repeated lockdowns, during which people were confined in their homes for long periods of time, have fuelled a desire for space; access to gardens; and less crowding"*[31]

A recent update to the aforementioned survey, in 2021, found that a property's square footage was still '*important*' or '*very important*' to 89% of surveyed buyers, keeping it amongst

[30] MFS (May 2021) The Homebuyer Wishlist 2021

[31] Resolution Foundation (May 2021) Pandemic leading to a 'race for space' – and soaring house prices in least populated areas, online

the most important factors but now ranking second having been replaced as the highest priority by access to a garden and/or outdoor space[32].

This is another issue that was '*brought to the fore during…lockdown*'[33], when access to private open space was a critical factor and those without such space were found to be the least comfortable[34]. In another recent survey, this time only of first-time buyers, nearly two thirds (64%) reported that having a private garden has become more important to them since the start of the pandemic, this rising in importance more than any other factor[35]. Gardens generally cannot, by design, be offered to households occupying flats, and it is telling in this context that the demand for flats nationally has been much more subdued throughout the pandemic – prices rising by only 1% – compared to other property types, like detached houses which have risen in price by 10% on average[36].

It is separately noted, in the context of the segment of market demand to date associated with a town centre urban product, that the above market trends have presented increasing challenges to First Time Buyers (FTB) who have struggled over the past year, with younger people facing higher levels of unemployment and furlough and house prices rising out of reach and the withdrawal of high loan-to value mortgages. FTBs fell from 30% of mortgaged buyers to 24% by March 2021; furthermore, the end of Help to Buy in 2023 will knock back FTBs numbers, which previously supported in the region of 40,000 FTB purchasers per year. Where this segment of the market has traditionally represented a key part of demand for more urban products to be sustained it will appear to need some form of government support or greater contributions by the Bank of Mum and Dad.

Whilst it is recognised that the longer-term consequences of the pandemic are uncertain it is apparent from the above that there is a real risk that for a period of time the demand for smaller flatted developments, in particular where the surrounding infrastructure is less developed, will be more muted. This reflects both a demand picture, recognising changing household aspirations, but also the capacity of this specific segment to access the finance needed to enter the housing market. This provides further evidence that the approach taken by the Council to assume that the Town Centre will deliver such a significant proportion of the overall supply is not justified in the context of need or market evidence.

The scale of the challenge: comparator town analysis

Within previous representations the point was raised as to the scale of change envisaged with regards the implied population growth in the town centre associated with planned provision. This has been re-visited here to take account of the latest trajectory of development.

As referenced above it is understood that the Town Centre is envisaged to accommodate some 4,365 homes over the plan period. When considering the average size of households that currently occupy flats in the borough, this has the potential to accommodate circa 6,175

[32] MFS (May 2021) The Homebuyer Wishlist 2021

[33] Health Foundation (December 2020) Better housing is crucial for our health and the COVID-19 recovery

[34] Place Alliance (October 2020) Home Comforts: how the design of our homes and neighbourhoods affected our experience of the Covid-19 lockdown and what we can learn for the future

[35] Share to Buy and Peabody (March 2021) Survey reveals home buyers' post-pandemic priorities, online

[36] Rightmove (August 2021) Price of flats up just 1% since pandemic began, while detached homes jump by 10%, online

residents[37]. With the Town Centre estimated to accommodate around 3,018 people as of 2015[38] – and no more up-to-date estimate available – this means that the proposed supply would effectively more than treble the population living in this area over the plan period. It is noted that in the preceding years to 2011 the LHNA confirms that the Town Centre population has grown by only 24%, highlighting the scale of the change envisaged[39].

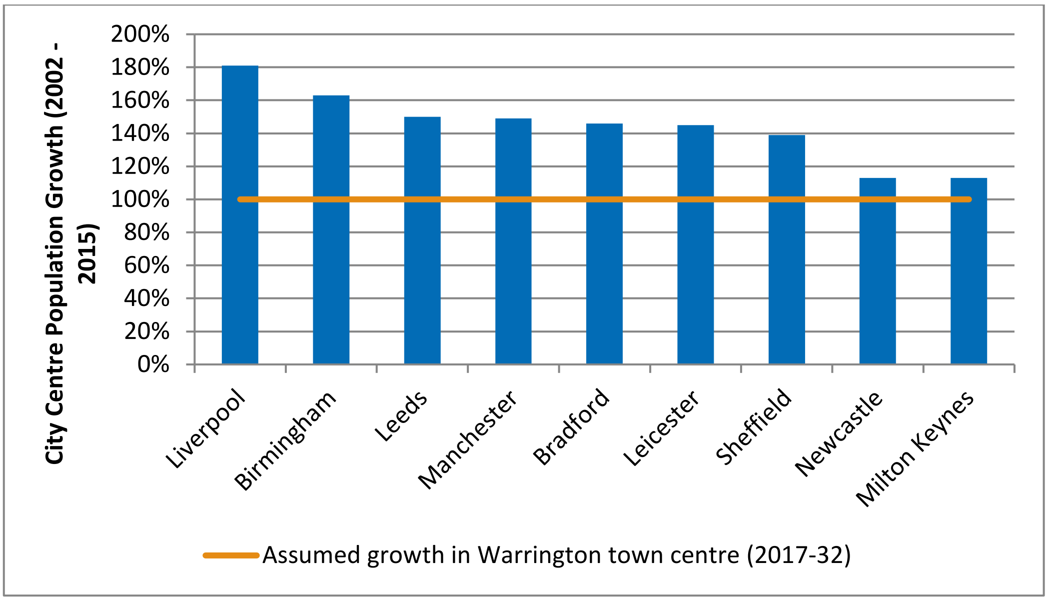
Table 2.1 Rate of Population Growth Assumed in Town Centre to 2037

	Existing (2019)	By 2038
Cumulative delivery	–	4,365
Cumulative population	**3,018**	**9,193**
Relative to existing	–	204%

Source: Warrington Borough Council, 2019; Census 2011; Turley analysis

In 2018, Centre for Cities[40] analysed the resident population of 57 town and city centres in England and Wales, of which only nine (16%) had successfully doubled their resident population between 2002 and 2015, a period that notably incorporated strong market conditions prior to the recession. Of these cities, listed below, only one – Milton Keynes – started from a lower base than Warrington, indicating that most comparably sized towns and cities have been unable to achieve such a rate of growth within this period of time.

Figure 2.3 Benchmarking Historic Growth in City Centre Populations (2002 – 2015)



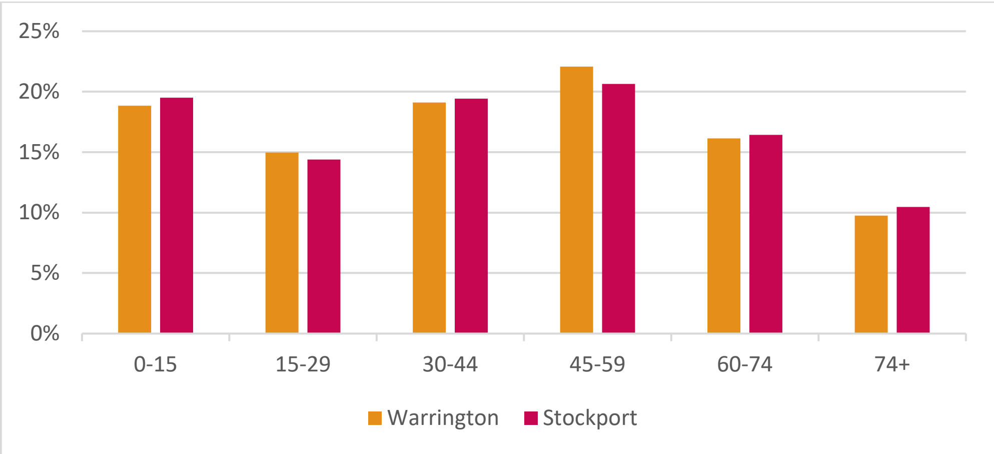
Source: Centre for Cities, 2018

[37] The 2011 Census recorded an average of 1.41 residents in purpose-built flats or apartments in Warrington
[38] Warrington Local Housing Needs Assessment Update (August 2021), Table 117
[39] *Ibid*
[40] Centre for Cities (2018) The UK's rapid return to city centre living, https://www.bbc.co.uk/news/uk-44482291

Case study: Stockport
The final section of this appendix uses a case study comparator to highlight the challenges that Warrington faces in realising its ambition for its Town Centre.

Stockport is one of the ten Greater Manchester authorities and whilst its population is slightly larger than Warrington, with 294,197 people in Stockport compared to 209,397 in Warrington as at 2020, Figure 2.4 shows that the profile of its population is broadly comparable. This reflects the fact that a large proportion of both authorities population is accommodated in a comparatively urban area.

Figure 2.4 Comparing the population and age profile of Stockport and Warrington



Source: ONS 2020 Mid-year population estimates

With regards to their planning context, Stockport Council are also in the process of preparing a new NPPF-compliant plan, following its decision to withdraw from the Greater Manchester Strategic Framework process.

Specifically, noting the above context and commonalities between the authorities, Stockport has like Warrington had longstanding ambitions to see a residential community develop at the heart of the urban area.

To this end Stockport Council have been working on their Town Centre West Residential Plan for a number of years, culminating in March 2017 with the report of the Corporate Director for Place Management and Regeneration. The purpose of this report was to accelerate Brownfield First delivery by articulating the Council's determination to optimise the development potential of certain brownfield sites while ensuring quality of development and avoiding over-development/ over-supply in of the existing urban area.

Similar to the approach taken by Warrington Council in the reliance placed on the Town Centre as a key component of delivery, Stockport's plans saw the town centre as presenting a major opportunity for brownfield development in support of a wider residential agenda comprising the development of a wide range of different types and tenures in the centre as well as increasing and diversifying the town centre's population.

There are six main sites, some of which are groups of sites which make up the 40 acres of the Town Centre West Residential Area. They include a number of development opportunities to the West of the Town Centre, which include the Weir Mill site sold to Capital and Centric 2019, sites within the Rail Station masterplan and the former Bus Station Interchange site, accessible from the A6. The boundary of the sites closely interrelate, forming a corridor from the River Mersey up King Street West to the Railway Station. The sites are within a highly sustainable location, being served by two major public transport hubs – The Railway Station and the proposed new interchange, as well as having good access to the strategic road network via Junction 1 of the M60. They are very close to existing employment areas and social and community facilities and benefit from Open Space along the River Mersey corridor and Trans Pennine Trail.

In the long term the Town Centre Living Strategy suggests that the development area has the potential capacity to accommodate up to 3,000 new homes. The realisation of this level of delivery is, however, dependent upon the relocation of some major transport Hubs, including the Stagecoach site behind the Railway Station, the Fire Station as well as other sites identified in the Rail Station Master Plan; these will be dependent upon assessing viable relocation options, with this impacting upon a reasonable timetable or programme for the delivery of all of these homes.

Where the ambition has evidently been articulated for a number of years in terms of delivery to date it is observed that one of the two main schemes identified in the 2017 plan, amounting to 200 units – The Interchange, has only recently been granted planning approval, being subject of extensive negotiations with Stockport Council, Transport for Greater Manchester and the Greater Manchester Combined Authority. The intended £120 million mixed use scheme is dependent upon £21.5 million grant from the Housing Investment Loans Fund to kickstart the residential project, and is not due to come forward until 2024. Separately another of the anchor schemes, Weir Mill, a scheme for circa 253 units, is subject to a loan of £60 million, which is in addition to a previous £7 million housing grant from Homes England, to ensure the sensitive regeneration of the existing Grade II listed Mill, provided through the Mayoral Development Corporation Investment Facility. The scheme will include a 14-storey new build apartment block, partially obstructing views from the famous viaduct. Permission is still awaited on the scheme while the secretary of state determines if the decision will be called in; no fixed dates for completion of the project have been set though it is reasonable to envisage a 3-4 year build out period which will not start for a number of years.

These two development sites, Interchange and Weir Mill, independently demonstrate “the viability gap in mixed use high rise developments” within town centre schemes in the North West, with their progress attracting scrutiny since the applications for planning were lodged.

This is despite both schemes benefiting from significant Central Government incentives, Homes England funding or local authority investment facilities which in the case of Stockport is an MDC loan. Without such assistance it is the case that the viability of these town centre schemes would otherwise be unfeasible.

It is evident from the above that the experience of Stockport serves as an important indication as to the challenges that Warrington will face in seeking to deliver its own ambitions. Where there has been a common ambition in Stockport to see its town centre accommodate a residential population, the reality has highlighted the need for and delays associated with securing the public sector funding sources required to make development viable. There is no evidence to suggest from a market perspective that development in Warrington will not require a similar level of support and assistance and as a result it must be recognised that the delivery of large numbers of new homes in the town centre will take a considerable time. Acknowledging the low levels of delivery to date and the scale of investment envisaged within the wider fabric of the town centre that it is considered that it is wholly unrealistic for the Council to assume that over 4,000 homes will be needed or delivered within the Town Centre in the plan period. A more realistic assessment must therefore be made by the Council taking full account of both need and demand evidence.

Turley