

## **HOUSING LAND SUPPLY ASSESSMENT**

**Date: November 2021**

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### **1. EXECUTIVE SUMMARY**

- 1.1 The Updated Proposed Submission Version Local Plan 2021-2038 (the second draft Regulation 19 WLP) sets the housing requirement for the Plan period.
- 1.2 ‘Policy DEV1 – Housing Delivery’, under the heading ‘Housing Distribution’, says that the majority of new homes will be delivered within the existing main urban area of Warrington, the existing inset settlements and other sites identified in the Council’s Strategic Housing Land Availability Assessment (SHLAA), which together have identified deliverable capacity for a minimum of 11,785 new homes.
- 1.3 It is unclear where the 11,785 figure has come from as the evidence within the 2020 SHLAA does not tally with that figure. Table 3.7 of the SHLAA identifies a capacity of 10,430 homes over a 15 year period. The proforma at Appendix 1 of the SHLAA goes on to identify a further 717 homes from SHLAA sites beyond 15 years. This totals 11,147 homes, falling short of that referred to in the policy by 638 homes. This represents a significant portion of the annual housing requirement per annum and clarity is therefore required from the Council where the 11,875 figure has come from.
- 1.4 The policy goes on to suggests that 4,821 homes would come forward from Green Belt release over the Plan period including:
- 2,400 homes at the South East Warrington Urban Extension;
  - 1,130 homes at Fiddlers Ferry;
  - 310 homes at Thelwall Heys; and,
  - 801 homes at the outlying settlements.
- 1.5 The Council’s housing trajectory is shown in Appendix 1 of the second draft Regulation 19 WLP, and the supporting text in the Plan says that this shows that there is a sufficient land supply to deliver the housing requirement for the Borough over the Plan period as a whole (paragraph 4.1.9). A copy of the Council’s housing trajectory is appended to this note for ease of reference and shows a housing land supply of **16,676 homes (Appendix 7A)**.
- 1.6 Within this note we have assessed the housing land supply identified in the Council’s housing trajectory. There is insufficient justification for **5,240 homes**. Our housing trajectory shows a housing land supply of **11,436 homes (Appendix 7B)**. A comparison between the Council’s claimed housing land supply and ours is summarised in the table overleaf.

**Table 1: Comparison Between Council and Pegasus Housing Land Supply within the Plan Period**

	Council	Pegasus	Difference
<b>Wider Urban Area</b>			
SHLAA (Sites 0.25Ha and above)	6992	5230	-1,762
<b>Peel Hall</b>			
SHLAA Ref: 1506	1200	741	-459
<b>Waterfront</b>			
SHLAA Ref: 1541 (Parcel K7)	340	100	-240
SHLAA Ref: 1633 (Parcel K5)	730	570	-160
<b>Fiddlers Ferry Power Stn</b>			
Northern Parcel (GB Release)	860	0	-860
Southern Parcel (GB Release)	450	0	-450
<b>Garden Suburb</b>			
Option 2 (GB Release)	2430	1,776	-654
SHLAA Sites (HE consented)	772	772	0
<b>Top-up Sites</b>			
Thelwall Heyes (GB Release)	350	0	-350
Stockport Road (GB Release)	0	0	0
<b>Settlements</b>			
Croft (GB Release)	75	75	0
Culcheth (GB Release)	200	200	0
Hollins Green (GB Release)	90	90	0
Lymm - Warrington Rd (GB Release)	170	170	0
Lymm - Rushgreen Rd (GB Release)	136	136	0
Winwick (GB Release)	130	130	0
SHLAA (Sites 0.25Ha and above)	95	95	0
<b>Other</b>			
SHLAA (Sites 0.25Ha and above)	198	198	0
<b>Small Sites Allowance</b>			
SHLAA (Sites under 0.25Ha)	1458	1210	-248
<b>TOTAL</b>	<b>16676</b>	<b>11493</b>	<b>-5,183</b>

*Source: Appendix A and Appendix B of this note*

- 1.7 We have also compared our housing land supply with the housing requirement of 816 homes per annum as set out in the Plan and 945 homes per annum as the objectively assessed need, as shown in the table below. The housing land supply will not achieve the housing requirement for the Borough over the Plan period as a whole and on this basis 'Policy DEV1 – Housing Delivery' is **unsound**.

**Table 2: Housing Supply v Requirement over the Plan Period**

		Requirement / Supply	Requirement / Supply
A	Annual Target	816	945
B	2021 to 2038 (18 years) (Ax18)	14,688	17,010
C	Flexibility at 10% (10% of B)	1,469	1,701
D	Total Requirement (B+C)	16,157	18,711
E	Supply	11,493	11,493
	<b>Deficiency (D-E)</b>	<b>4,664</b>	<b>7,218</b>

- 1.8 The deficiency in the identified housing land supply results in a requirement for additional land to provide **4,664 homes** over the Plan period, against the local housing need of 816 homes per

annum, or **7,218 homes** over the Plan period, with a housing requirement at 945 homes per annum.

- 1.9 For 'Policy DEV1 – Housing Delivery' to be found sound, more housing land is required to ensure the minimum housing needs of the Borough are met during the Plan period and to ensure there is sufficient choice and competition in the market for land, as per the requirements in Section 5 of the National Planning Policy Framework ("NPPF).
- 1.10 The shortfall represents an exceptional circumstance for further Green Belt release.
- 1.11 The inclusion of additional Green Belt release in south east Warrington and a return to the former Warrington Garden Suburb allocation would provide deliverable and developable land for housing development.
- 1.12 Allocating the remaining land in the Warrington Garden Suburb area would deliver an additional **2,334 homes** over the Plan period. In total, Warrington Garden Suburb would deliver **4,110 homes** from Green Belt release including:
  - 750 homes on Miller Homes land;
  - 1,026 homes on Homes England land; and,
  - 2,334 homes on the remaining land at Warrington Garden Suburb.
- 1.13 This represents an **increase of 1,680 homes** over the Council's suggested housing trajectory of 2,430 homes from Green Belt release at South East Warrington Urban Extension. Our housing trajectory (with remaining land at Warrington Garden Suburb) shows a total housing land supply of 13,827 homes (**Appendix 7C**).
- 1.14 This would reduce the deficiency identified in the housing land supply to **2,330 homes** over the Plan period, against the local housing need of 816 homes per annum, or **4,834 homes** over the Plan period, with a housing requirement at 945 homes per annum.

**Table 3: Housing Supply v Requirement over the Plan Period (including remaining land at WGS)**

		Requirement / Supply	Requirement / Supply
A	Annual Target	816	945
B	2021 to 2038 (18 years) (Ax18)	14,688	17,010
C	Flexibility at 10% (10% of B)	1,469	1,701
D	Total Requirement (B+C)	16,157	18,711
E	Supply (including remaining land at WGS)	13,827	13,827
	<b>Deficiency (D-E)</b>	<b>2,330</b>	<b>4,884</b>

**2. WIDER URBAN AREA (SHLAA SITES 0.25HA AND ABOVE)**

**Table 4: Comparison Between Council and Pegasus Housing Land Supply**

	<b>Council</b>	<b>Pegasus</b>	<b>Difference</b>
<b>Wider Urban Area</b>			
SHLAA (Sites 0.25Ha and above)	6992	5230	-1,762

**Source:** Appendix A and Appendix B of this note

- 2.1 The Council's housing trajectory shows that 6,992 homes are intended to come forward in the wider urban area, from the SHLAA sites of 0.25ha and above. However, there is no clear evidence provided within the SHLAA as to how this figure is derived and there is no transparency within the Local Plan itself because the sites relied upon by the Council are not formally allocated or identified within the Local Plan or on the supporting Proposals Map.
- 2.2 Bearing in mind the Local Plan does not seek to formally allocate these sites for development but relies upon them to meet the Borough's minimum housing requirement, transparent and clear evidence should be provided.
- 2.3 We accept that the SHLAA represents a snap shot in time and there may be a need to update the SHLAA again prior to the examination of the Local Plan commencing but Paragraph: 026 Reference ID: 3-026-20190722 of Planning Practice Guidance ("NPPG") clearly states the assessment will need to be made publicly available and in an accessible form.
- 2.4 Whilst available on the Council's website, the 2020 SHLAA or a link to it, has not been included on the Local Plan consultation page under the evidence base link. As such, it's status in the context of the second draft Regulation 19 WLP and what is proposed to be examined is not entirely clear. This will undoubtedly hinder the ability for the general public to fully understand the evidence base that underpins the Local Plan that is currently out for consultation. The ability to review and scrutinise the Council's approach is a fundamental part of a fair and open consultation process and ultimately a robust examination of the Local Plan.
- 2.5 Paragraphs 68a, 68b and 74 of the NPPF do all clearly state that 'specific deliverable' and 'specific developable' sites should be identified by strategic policy-making authorities. Whilst there are a series of proforma within Appendix 1 of the SHLAA and a list of constrained sites within Appendix 2, there is no complete schedule of SHLAA sites within the wider urban area, that the Council specifically identify as being deliverable and/or developable and how the anticipated delivery of those specific sites then tallies within the Council's housing trajectory at Appendix 1 of the second draft Regulation 19 WLP.
- 2.6 Our view is that this is a serious omission and prevents any reasonable scrutiny of the urban capacity in the wider urban area and how the urban supply trajectory from sites over 0.25ha is formulated and calculated.

2.7 Having reviewed a number of the sites identified in the proformas at Appendix 1 of the SHLAA, it is clear that not all the homes from this source have planning permission and there will inevitably be some sites that are put forward through a call for sites exercise by owners, agents and others but may never materialise for development during the Plan period. Indeed, the Council have to make some broad assumptions in the SHLAA. For instance, at paragraph 2.33, the Council state:

*"All sites were considered to be free from ownership or tenancy issues unless there was specific evidence/information to the contrary."*

2.8 It must be acknowledged that some sites put forward will inevitably have ownership/tenancy constraints and some owners may simply decide not to bring their site forward. In short, it has to be acknowledged that there will be a broad degree of risk and such risks means it would be unreasonable to assume the total potential capacity of all sites assessed will not result in the actual deliverable amount over the Plan period.

2.9 For example, having considered the proforma within Appendix 1 of the SHLAA it is clear that the following sites are not being promoted for development by the landowners and have no developer interest.

**Table 5: Wider Urban Area SHLAA Sites without Landowner or Developer Interest**

SHLAA Ref	Site Name	Number Homes
1809	Europcar	25
1719	Furnish with Flair Site	40
2480	Former K&N Works	42
2478	General Street Metal Works	44
2681	Land bounded by Haydock Street, Ashton Street and John Street	49
2463	Midland Way / Priestley Street Garage	20
2189	Bridgewater House and Depot	12
1733	Hall Motors Site	31
2481	Land enclosed by Hopwood Street, School Brow and Crossley Street	109
2177	Grappenhall Hall Residential School	20
2471	Pinners Brow Retail Park	193
1543	Knutsford Road	93
3567	Dallam Lane (West Side)	140
2261	Rear of former Hewden Tool Hire	11
2172	Land at Rixton New Hall	11
<b>TOTAL</b>		<b>840</b>

**Source:** SHLAA

2.10 Also, having considered the proforma within Appendix 1 of the SHLAA it is clear that the following sites had no planning permission history at the time of the SHLAA.

**Table 6: Wider Urban Area SHLAA Sites with no Planning Permission History**

SHLAA Ref	Site Name	Number Homes
2193	Houghton Hall	21
3309	Land behind the Plough PH	11
1647	Land off Mill Lane	28

1809	Europcar	28
2472	Former Cabinet Works and Vicinity	36
1719	Furnish with Flair Site	40
2188	Delenty Drive Police Station	9
2480	Former K&N Works	42
2478	General Street Metal Works	44
0	Railway Sidings/Depot	87
3569	Bankside	8
2681	Land bounded by Haydock Street, Ashton Street and John Street	49
2463	Midland Way / Priestley Street Garage	20
3570	Warrington Police Station	10
0	Motor House	20
2716	Land at Peel Cottage	4
2261	Rear of former Hewden Tool Hire	11
2189	Bridgewater House and Depot	12
1723	Land at Hopwood Street	21
2460	Boulting Electrical Systems	13
3571	Charles Stewart House	24
3357	Old Rectory	5
1755	Garven Place Clinic	17
2129	Land off Knutsford Road / Blackbear Bridge	25
2187	Bewsey Old School	22
0	Former Mr Smiths Site	198
1607	The Old Rectory	4
0	New Town House	203
1733	Hall Motors Site	31
1753	Land at the rear of St. James Court	38
0	Go Outdoors	103
2481	Land enclosed by Hopwood Street, School Brow and Crossley Street	109
0	Warrington Civils & Lintels	132
3568	Warrington Borough Transport Depot	153
1710	Dalton Bank Council Depot	65
0	Land at Scotland Road	406
2177	Grappenhall Hall Residential School	20
2182	PDC Irwell Road	50
2720	Radley Cottage	42
2471	Pinders Brow Retail Park	193
0	Causeway Park	60
1543	Knutsford Road	93
2172	Land at Rixton New Hall	2
2482	Wharf Industrial Estate	128
3567	Dallam Lane (West Side)	140 and 72 from 2035
<b>TOTAL</b>		<b>2,777 and 72 homes from 2035</b>

**Source:** SHLAA

2.11 We have reviewed the planning history of some of the larger sites on the Council's portal which has not flagged up any relevant planning permissions. Indeed, SHLAA 3567 is not being promoted and has a recent application submitted for a change of use to B2.

**Table 17: Planning History for Larger SHLAA Sites**

SHLAA Ref	Site Name	Relevant Planning History
0	Former Mr Smiths Site	N/A
0 / 0	New Town House / Land at Scotland Road	2020/36593 - EIA Screening Opinion - Demolition of the existing buildings on the western part of the Cockhedge Shopping Centre and the creation of a residential-led mixed use development which includes a hotel and on-site ancillary ground floor retail floorspace. Screening opinion issued 03/04/2020  2020/38061 - Application to determine if prior approval is required for a proposed: Demolition of Buildings. Registration 02/11/2020, undetermined
0	Warrington Civils & Lintels	N/A
3568	Warrington Borough Transport Depot	N/A
2471	Pinner's Brow Retail Park	N/A
2482	Wharf Industrial Estate	N/A
3567	Dallam Lane (West Side)	2021/40222 - Change of use of the existing warehouse from B8 (Storage or distribution) to B2 (General Industrial) for use as a Clean Plastics Recycling Facility (no external alterations) with ancillary office accommodation and parking Registration 27/09/2020, undetermined

**Source:** Council Portal

- 2.12 Even for sites with planning permission, not all of them will materialise into a start on site. Guidance suggests that between 10% to 20% of permissions will never materialise (Stock and Flow, Planning Permissions and Housing Output, NLP, January 2017). There is no evidence in the SHLAA to suggest that the Council have applied a lapse rate to this element of the supply.
- 2.13 Indeed, it is not clear whether the Council have applied any level of flexibility to any of the SHLAA sites within the wider urban area to ascertain the 6,992 homes identified in the Council's housing trajectory. As such, whilst the SHLAA suggests that projections have continually been exceeded, until further detail is provided by the Council as to which sites they have included in the urban capacity in the wider urban area, to reduce the risk associated with this element of the supply we have applied a 25% reduction to sites within this category, which reduces this element of the supply to **5,230 homes** (i.e. **1,762 less than claimed**).
- 2.14 Once the SHLAA has been formally updated with additional details required and submitted as part of the evidence base, we reserve the right to revisit this evidence in advance of the examination hearings.

**3. PEEL HALL (SHLAA 1506)**

**Table 8: Comparison Between Council and Pegasus Housing Land Supply**

	<b>Council</b>	<b>Pegasus</b>	<b>Difference</b>
<b>Peel Hall</b>			
SHLAA Ref: 1506	1200	741	-459

*Source: Appendix A and Appendix B of this note*

- 3.1 The Council's housing trajectory shows that 1,200 homes are intended to come forward at Peel Hall.
- 3.2 The SHLAA shows that:
- Relevant planning history includes application 2016/28492;
  - The site has capacity for 1,200 homes;
  - This is a greenfield site which is being promoted by the landowner;
  - The site would start delivering from 2025/2026; and,
  - The site would delivery at a build rate of 55 homes in 2025/2026 and 110 homes per annum thereafter.
- 3.3 Application 2016/28492 was subject to appeal APP/M0655/W/17/3178530, which was allowed in November 2021.
- 3.4 'Policy MD4 - Land at Peel Hall' says that land comprising approximately 69ha at Peel Hall will be allocated to deliver a new sustainable community of up to 1,200 new homes. This is consistent with the recently allowed appeal.
- 3.5 The Council's housing trajectory also shows that the site would deliver at a build rate of 60 homes in 2026/2027 and at a rate of 120 homes thereafter. However, there appears to be very little evidence that the site would deliver at this build rate either in the evidence base underpinning the second draft Regulation 19 WLP or the planning application / appeal documents. Indeed, the SHLAA identifies that the site would have a build rate of 55 homes in the first year and 110 homes thereafter. As such, there is an inconsistency between the SHLAA and the Council's housing trajectory.
- 3.6 We would also question the delivery of 110 homes per annum as it is not clear from the evidence supporting the second draft Regulation 19 WLP as to how many developers are likely to bring the site forward. Our understanding is that the site is within one ownership and therefore there is every chance that it will be brought forward by one housing developer, which is highly unlikely to deliver 110 homes per annum on any given site. Regardless of the number of developers, Appendix 6 of the SHLAA confirms the average built date for sites over 150 homes, is 56.81 homes (and we note the Council have looked at sites in the region of 1,000 homes as part of this analysis).



- 3.7 As such, it is reasonable to assume that the site would deliver at a rate of 57 homes from 2026/2027 and continue at this rate thereafter. Indeed, whilst it is a large site, it is not so geographically spread out that it falls within different market areas of even different neighbourhoods of north Warrington. Any two parcels of land coming forwards on this allocation at any one time, would directly compete with each other and therefore even with two developers on site, we do not consider the 110 per annum figure would be reached. The Council's evidence at Appendix 6 of the SHLAA clearly shows that the maximum build out rate on a large site in Warrington has been 84 homes per annum, which would seem reasonable to apply if an optimistic approach was being taken but we do not see any compelling reason to depart from the average figure of circa 57 homes per annum.
- 3.8 As such, we have applied this build rate in our housing trajectory which reduces this element of the supply to **741** homes over the course of the Plan period (i.e. **459 less than claimed**).

**4. WATERFRONT: SHLAA 1541 (PARCEL K7) & SHLAA 1633 (PARCEL K5)**

**Table 9: Comparison Between Council and Pegasus Housing Land Supply**

	<b>Council</b>	<b>Pegasus</b>	<b>Difference</b>
<b>Waterfront</b>			
SHLAA Ref: 1541 (Parcel K7)	340	100	-240
SHLAA Ref: 1633 (Parcel K5)	730	570	-160

*Source: Appendix A and Appendix B of this note*

4.1 The Council's housing trajectory shows that 340 homes are intended to come forward at SHLAA 1541 and 730 homes at SHLAA 1633.

4.2 The SHLAA site proforma suggests that:

- There are no planning permissions for these sites;
- The western parcel has capacity of 604 homes and the eastern parcel has capacity of 730 homes (total 1,333 homes);
- The sites are within Flood Zone 3a and 3b;
- West Coast Mainline abuts both parcels so noise and amenity buffers will be required;
- Both parcels are being promoted by the landowner but are not developable now;
- Whilst the western parcel has access it is unclear what quantum of development this could support;
- The western parcel starting to deliver new homes by 2026/2027;
- The eastern parcel has access constraints which are difficult to overcome owing to the River Mersey which forms its western boundary and the West Coast main line which forms its eastern boundary; and,
- The eastern parcel starting to deliver new homes by 2029/2030.

4.3 As such, the Council's evidence base rightfully recognises there are a number of issues associated with the deliverability of this site and the precise capacity is yet to be determined. 'Policy MD1 – Warrington Waterfront' goes further citing COMAH zones from nearby industrial areas, standoff requirements from various pipelines, flood risk issues, listed heritage assets and the need for SUDS to be incorporated into any proposed green infrastructure.

4.4 'Policy MD1 – Warrington Waterfront' also says that no development will be permitted until funding has been secured and a programme of delivery has been confirmed for the Western Link. The Western Link runs past the western parcel and it is notable that the proposed Policies Map seeks to safeguard large areas of both sites for this infrastructure. It is not clear from the Council's evidence base or the schematic plans of the site provided within Section 10.1 of the second draft

Regulation 19 WLP fully account for this constraint when arriving at the anticipated capacity of the site.

- 4.5 'Policy MD1 – Warrington Waterfront' states that Warrington Waterfront will be allocated as a new urban quarter to deliver around 1,335 homes of which 1,070 homes will be delivered in the Plan period. Due to the number of competing constraints on this site, and the high number of homes being proposed through the policy, we would have expected to see a greater level of master planning and constraints analysis for this site. However, there is very limited information submitted for consultation alongside the second draft Regulation 19 WLP. As such, we reserve judgement on the total capacity of the site until we see further corroborating evidence from the Council on this.
- 4.6 With regard to the delivery of this site, this site is inextricably linked to the delivery of the Western Link and the delivery of the western parcel needs to take place before the delivery of the eastern parcel.
- 4.7 In 2017, a public engagement exercise was undertaken to determine the preferred route of the Western Link. Following that, the Department for Transport conditionally awarded £142.5 million for the Western Link in 2019. However, the total estimated build costs were £212 million. The Infrastructure Delivery Plan 2021 also identifies that Warrington Waterfront will require a major junction with the Western Link (at a cost of around £1.3 million and two all-purpose bridges across the River Mersey at a cost of around £11.3 million, which we note may represent additional costs). Even so, there is a funding gap and it is on that basis that the Council are now preparing a major scheme business case which is expected to be submitted in due course with funding secured in late 2022.
- 4.8 In short, this funding gap is not in place as of yet and no development at Warrington Waterfront can therefore be permitted until at least 2022 at the earliest (assuming the funding gap is addressed). However, it is unlikely that any planning applications for residential will be submitted until such time that this funding and implementation of the Western Link is 100% secured. Indeed, whilst it is understood that a planning application has been submitted for the Western Link, it has yet to be validated<sup>1</sup>.
- 4.9 The Western Link itself is currently programmed to be completed by early 2026 with the project being closed out and evaluated mid-2026 to mid-2027<sup>2</sup>.
- 4.10 Given the extent of the proposed works and Western Link and the number of parcels of land it crosses, it is safe to assume that some form of CPO process is going to be required as well as sign off from various other governmental departments such as Network Rail, the Environment Agency and Highways Agency. Indeed, all the above was noted in the Council's submitted business case

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<sup>1</sup> Page 3, Draft Local Plan Transport Frequently Asked Questions (October 2021)

<sup>2</sup> <https://www.warrington.gov.uk/western-link>

by Mott Macdonald in 2017<sup>3</sup>. It is clear from the Scheme Delivery Programme (provided at **Appendix 7D** to this note) and the Risk and Opportunity Register (provided at **Appendix 7E** of this note) that an optimistic ('best foot forward') approach was taken in 2017.

- 4.11 Indeed, the Gant chart in the Scheme Delivery Programme assumes one part of the programme will seamlessly follow the next and no room has been allowed for potential slippage, delays due to adverse decisions, change in local political make up, simple lack of resourcing. In fact, in 2017 it was assumed that a planning application for the Western Link would have been submitted in May 2019 and determined within three months following submission in August 2019, when it is clear that we are far removed from that today.
- 4.12 Even after the potential of a planning permission, and OJUE tendering process needs to be undertaken and a CPO process has to be carried out. Notably, in the original 2017 programme, the CPO process (including hearings and confirmation from the SoS) was also originally anticipated to have taken place by now and completed by February 2021. It is evident that this programme was far too optimistic at the time, and whilst the Council have pushed back the delivery of this site, they are still assuming a risk free passage through to delivery of the Western Link, when history highlights that caution and contingency buffers should be applied.
- 4.13 In short, there is still a very long way to go in respect of the delivery of the Western Link and we therefore consider the proposed 2027/2028 first completions on this site are overly ambitious. Indeed, due to the uncertainties associated with the delivery of the Western Link and the fact both parcels are reliant on its delivery, our position is that a realistic start on site is likely to be around 2029/2030 at the earliest on the western parcel. We have restricted this to 57 homes per annum in line with the evidence at Appendix 6 of the SHLAA.
- 4.14 We have also pushed back the delivery of the eastern parcel because this is incumbent on a further internal bridge crossing over the river that will link the two sites. Given this will be an additional high cost, we don't anticipate that will come forward until such time that there has been sufficient returns on the western parcel and a passed outward delivery to the crossing point. As such, we do not anticipate development commencing on the eastern parcel until 2036/2037. We maintain the Council's 40 homes per annum on this parcel noting there is likely to be a reduced level of delivery overall across both parcels due to the proximity of them. This gives a combined peak annual delivery of 97 homes per annum, which we note is still higher than the highest annual delivery rate in the Council's evidence at Appendix 6 of the SHLAA.
- 4.15 Applying these assumptions, reduces this element of the supply in the Plan period to **100 homes** for SHLAA 1541 (Parcel K7) and **570 homes** for SHLAA 1633 (Parcel K5) (i.e. **240 homes and**

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<sup>3</sup> <https://www.warrington.gov.uk/western-link-outline-business-case>

**160 homes less than claimed respectively**). We reserve the right to revisit this in advance of the examination hearings and should any further evidence be forthcoming.

**5. FIDDLERS FERRY POWER STATION: NORTHERN PARCEL & SOUTHERN PARCEL (GB RELEASE)**

**Table 10: Comparison Between Council and Pegasus Housing Land Supply**

	<b>Council</b>	<b>Pegasus</b>	<b>Difference</b>
<b>Fiddlers Ferry Power Stn</b>			
Northern Parcel (GB Release)	860	0	-860
Southern Parcel (GB Release)	450	0	-450

**Source:** Appendix A and Appendix B of this note

- 5.1 The Council’s housing trajectory suggests that a total of 1,310 homes would come forward at Fiddlers Ferry over the Plan period from Green Belt release; 860 homes on the northern parcel and 450 homes on the southern parcel.
- 5.2 ‘Policy MD3 – Fiddlers Ferry’ of the second draft Regulation 19 WLP says that land at the former Fiddlers Ferry Power Station site will be allocated to deliver a mixed-use development comprising approximately 101ha of employment land and a minimum of 1,760 new homes, of which 1,310 homes will be delivered in the Plan period. It goes on to identify that the allocation will include the removal of 82 ha of land from the Green Belt to accommodate a minimum of 860 new homes on land to the north of the railway line and a further 900 homes to the south of the railway line (450 homes in the Plan period).
- 5.3 It is noted that the HRA contemplates that the Fiddlers Ferry allocation could have significant effects on European Sites, especially the Mersey Estuary SPA and Ramsar. On that basis the proposed allocation is ‘screened in’ in the HRA.
- 5.4 The Appropriate Assessment within the HRA notes that all qualifying bird species of the SPA and Ramsar have been recorded on land encompassing the allocation but that “it is considered that this policy wording is sufficiently protective to allow a conclusion of ‘no adverse effect’ at the plan level, because it ensures that further work (e.g. habitat assessments and bird surveys) will be required to support relevant planning application(s).”
- 5.5 Thus, the Council’s HRA delegates the acceptability of development at Fiddlers Ferry to the project specific HRA(s) required through this policy. It is therefore questionable whether any residential development proposed at Fiddlers Ferry is deliverable before any project specific HRA is produced. The Council have also not demonstrated the number of homes that could be delivered, having regard to potential on-site mitigation, or whether other locations with a lower potential for adverse impacts on European Sites should be considered – or indeed preferred – as reasonable alternatives. Given that the HRA treats the proposed policy wording as mitigation for likely significant effects, no consideration is given to specific mitigation measures.
- 5.6 It is also notable that the evidence base for the second draft regulation 19 WLP does not include any explanation of the exceptional circumstances which the Council claims would justify the release of land to deliver 1,300 odd homes at the Fiddlers Ferry allocation. Although Arup considers the

Green Belt credentials of Fiddlers Ferry they expressly do not address the exceptional circumstances test<sup>4</sup>. The only justification for the Green Belt release (that we could find) is in the second draft regulation 19 WLP itself which states:

*"The exceptional circumstances for the removal of Green Belt land as part of the Fiddlers Ferry Opportunity Site relate to enabling the redevelopment of the largest brownfield site in the Borough, whilst providing a new sustainable residential community and a major ecological and recreational resource."* (paragraph 3.4.10)

- 5.7 The Council's rationale for releasing Green Belt land close to Fiddlers Ferry is essentially an enabling development argument. In our view, whilst the existence of exceptional circumstances is a matter of planning judgement, the Council's case must be based on evidence. As such, if a key plank of the Council's argument is that releasing Green Belt land for residential development will enable *"the redevelopment of the largest brownfield site in the Borough"* then it must be shown that the housing allocation is likely to achieve that objective, especially when the parcels proposed to be released from the Green Belt exhibit either a moderate or strong contribution to Green Belt purposes<sup>5</sup>. In short, without this evidence, the Fiddlers Ferry allocation is not sound, and the number of homes from this element of the supply have been **removed** (i.e. **1,310 homes less than claimed**). We reserve the right to revisit this in advance of the examination hearings and should any further evidence be forthcoming.

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<sup>4</sup> Page 3, Green Belt Assessment: Fiddlers Ferry (Arup, April 2021)

<sup>5</sup> Page 4, Green Belt Assessment: Fiddlers Ferry (Arup, April 2021)

**6. GARDEN SUBURB**

**Table 11: Comparison Between Council and Pegasus Housing Land Supply**

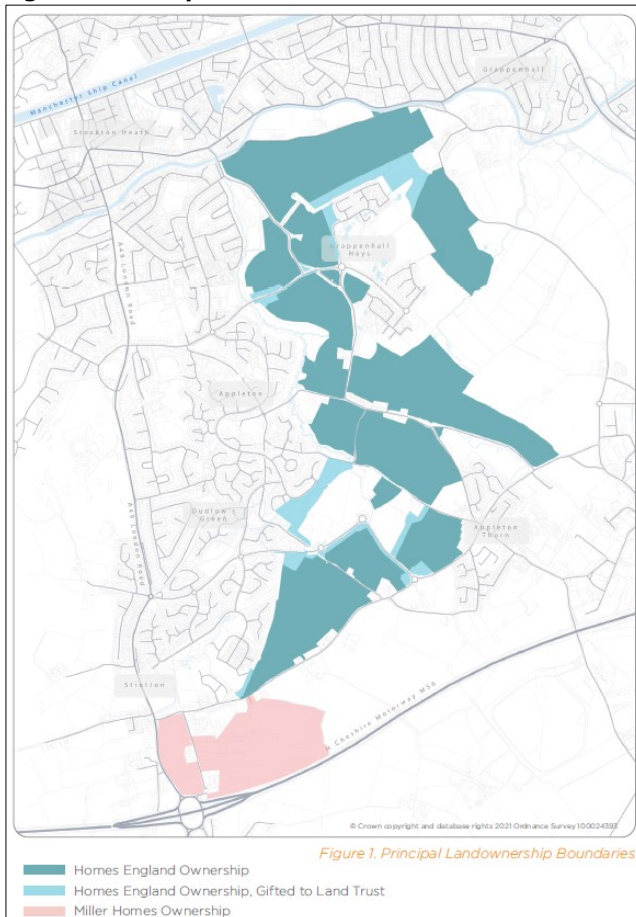
	<b>Council</b>	<b>Pegasus</b>	<b>Difference</b>
<b>Garden Suburb</b>			
Option 2 (GB Release)	2430	1,776	-654
SHLAA Sites (HE consented)	772	772	0

*Source: Appendix A and Appendix B of this note*

**Option 2 (GB Release)**

6.1 The Council’s housing trajectory shows that the Garden Suburb would delivery 2,430 homes over the Plan period. The landowners within the Garden Suburb (otherwise known as the South East Warrington Urban Extension) include Homes England and Miller Homes. This element of the supply in the Plan period is reduced to 1,776 homes which includes 969 homes on Homes England land 750 homes on Miller Homes land and (i.e. **654 homes less than claimed**).

**Figure 1: Principal Landowner Boundaries**



*Source: South East Warrington Urban Extension: A Deliverable Proposition (Homes England with Miller Homes, August 2021)*

6.2 ‘Policy MD2 - South East Warrington Urban Extension’ says that the South East Warrington Urban Extension will deliver a minimum of 4,200 homes in total of which around 2,400 homes will be delivered within the Plan period and is **unsound** on the basis of our assessment.



- 6.3 The land will not have the principle established for Green Belt release until the Local Plan is adopted which is currently anticipated in 2023. Furthermore, applications cannot be submitted until a Development Framework has been prepared, consulted upon with key stakeholders and the public and then formally agreed with the Council in advance (as per criteria 4 and 5 in Policy MD2 and paragraph 10.2.13). That process is likely add another year or more on to the timeframe from our experience with working with the Council and preparing such Frameworks and noting the scale of this site and the various policy criteria.
- 6.4 Criteria 7 of 'Policy MD2 - South East Warrington Urban Extension' also stipulates that no residential development will be permitted to commence until the funding and programme for the delivery of a highway scheme to relieve the A49 London Road/B5356 Stretton Road junction has been confirmed and works have commenced on site. Until then, a limit on housing completions will be set. The land required for those works is not controlled by Homes England (the principal landowner within the SEWUE) and therefore the organisation will have to wait until such time that Miller Homes have advanced their own proposals. In light of this, it is entirely appropriate to consider the delivery of homes on the respective landowner parcels separately.

***Miller Homes***

- 6.5 In 2018, Miller Homes (then Wallace Land Investments) sought a screening option on their land for between 592 homes and 1036 homes, which was followed by a scoping opinion in 2019 (2018/33876 and 2019/35994). The range in the number of homes reflects the fact that the final scale of the development will be an outcome of the masterplanning process.
- 6.6 We anticipate the developable area of the site will be reduced well below the higher housing figure cited in the screening opinion given:
- The proximity to the M56 and required off set distances;
  - The likely extent of the junction requirements onto the A49, which we believe will require a roundabout access to be provided within the Miller ownership and a slight realignment of the A49; and
  - 'Policy MD2 - South East Warrington Urban Extension' requires 'on site safeguarding of potential mass transit routes' within the developable area of the allocation under criteria 27e
- 6.7 Achievable densities on this part of the site allocation will also be influenced by Criteria 25, which confirms development at the south west edge of the allocation will be required to respect the Green Belt boundary and the character of the washed over Green Belt settlement of the Stretton to the west of the A49.
- 6.8 The indicative residential parcels on Miller Homes within the supporting WSP/Open Development Framework document issued alongside the Local Plan total around 20ha (net). Assuming an

average density of 37 dwellings per hectare as per the evidence base supporting the Local Plan and Policy MD2, the Miller Homes land can provide no more than **750 homes**.

- 6.9 Given that Miller Homes have proceeded with the screening and scoping opinions ahead of the land being released from the Green Belt, we anticipated that they would submit Full application(s) as soon as the Plan and Development Framework is approved by the Council. On that basis, the Miller site could start to deliver new homes from 2025/2026 if permission is secured and conditions are discharged at a good pace.
- 6.10 In line with the evidence provided at Appendix 6 of the 2020 SHLAA, an average build rate of 57 homes per annum is assumed for a single housebuilder, meaning Miller's land parcels would be delivered within a 13 year period and therefore within the Plan period.

***Homes England***

- 6.11 The slow track record of housing delivery on Homes England land in Warrington to date and the fact that the organisation would effectively have a monopoly on the land to the south of the Borough points to a highly probable slow release of additional Homes England land to the market. Indeed, Homes England are not a developer and whilst the organisation facilitates housing delivery, it can be a protracted process from experiences gained within Warrington and elsewhere.
- 6.12 As such, it is highly unlikely that Outline permission would be submitted for the Homes England land until at least 2025/2026. Given the scale of the Homes England Land it would not be surprising if two or more Outline applications were submitted by Homes England at a time in relation to specific parcels.
- 6.13 As illustrated by the planning history review of the Homes England consented sites within the South East Warrington Urban Extension provided at **Appendix 7F**, the organisation has typically taken around five years between obtaining Outline approval to starting to deliver new homes on site. This is because Homes England will typically seek an Outline planning permission and then undergo a formal sifting and invitation to tender process before the formal acquisition of a site by a developer can take place. This can add a further two to three years onto the process and in the case of Warrington, this is seen to be even more. Reserved matters permission would then be secured by a developer. Furthermore, the five year timeframe of the Homes England consented sites demonstrated in the preceding section of this note was for unconstrained sites where the principle of residential development has been established for decades.
- 6.14 On this basis, it is unlikely that Homes England land would start to deliver new homes until at least 2030/2031.
- 6.15 Furthermore, in the past 40 years there has been a successive change in the non-departmental public bodies responsible for accelerating housing delivery including the CNT, English Partnerships, the Homes and Communities Agency and most recently Homes England. The second draft

Regulation 19 WLP has a Plan period of 18 years up to 2038 and there is no guarantee that there will not be another change to the public body responsible for accelerating housing delivery over that time or that this will not impact the delivery of homes that are currently expected to come forward on Homes England land. Given that the vast majority of the land within the largely within the ownership of Homes England this poses a further risk to the slowing down of delivery.

- 6.16 Pegasus Group have undertaken a master planning exercise which identifies the indicative residential parcels on Homes England land totalling around 95ha (net). Assuming an average density of 37 dwellings per hectare as per the evidence base, the Homes England land can provide around 3,515 homes. Assuming that two developers could be on site at the same time, for example one at Grappenhall Heys and one at Appleton, a build rate of 110 homes per annum is assumed. Applying these assumptions, reduces this element of the supply in the Plan period to **969 homes on Homes England land**.

**Consented Homes England SHLAA Sites**

- 6.17 It is noted that this element of the supply will provide 772 homes over the Plan period. We have no comments to made about this element of the supply other than to note the slow delivery of these sites (**Appendix 7E**).
- The principle of residential development having been established at these sites for around 40 years under the New Towns Act 1981;
  - There not being a housing target in Warrington in the Core Strategy (adopted July 2014) – following the successful challenges by Satnam Millennium Limited which removed the housing target of 10,500 new homes (equating to 500 per year) between 2006 and 2027;
  - There not being a requirement for the sites to be developed in accordance with a Supplementary Planning Document, which would first have required a round of consultation and formal adoption in line with Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012;
  - All the sites being unconstrained greenfield sites; and,
  - All sites having the benefit of enabling infrastructure developed at the time of the Bridgewater East masterplan partial implementation.

**7. TOP-UP SITES**

**Table 12: Comparison Between Council and Pegasus Housing Land Supply**

	<b>Council</b>	<b>Pegasus</b>	<b>Difference</b>
<b>Top-up Sites</b>			
Thelwall Heyes (GB Release)	350	0	-350
Stockport Road (GB Release)	0	0	0

*Source: Appendix A and Appendix B of this note*

**Thelwall Heys (GB Release)**

- 7.1 The Council’s housing trajectory suggests that a total of 350 homes would come forward at Thelwall Heys over the Plan period from Green Belt release.
- 7.2 ‘Policy MD5 – Thelwall Heys’ allocates the site for a minimum of 300 homes.
- 7.3 However, as highlighted in our representations towards ‘Policy MD5 – Thelwall Heys’ and advanced in the heritage note at **Appendix 9** of the representations, the capacity of the site has not been supported by sufficient evidence demonstrating that the development would not have undue impacts on heritage assets which are within very close proximity of the site which contributes to its setting. As such, the NPPF presumption in favour of this site being allocated for residential development cannot be applied, particularly as there are other reasonable alternatives which would not result in harm to a heritage asset and the public benefit of allocating the site has not been demonstrated.
- 7.4 It has not been demonstrated that the quantum of development at this site would preserve their significance.
- 7.5 We have **removed** this allocation in the housing land supply but reserve the right to revisit this matter once the heritage implications have been throughout considered by the Council and the promoters of the site.

**Stockport Road (GB Release)**

- 7.6 The Council’s housing trajectory includes Stockport Road on their housing trajectory but suggests that no homes would come forward over the Plan period from Green Belt release.

**8. SETTLEMENTS**

**Table 13: Comparison Between Council and Pegasus Housing Land Supply**

	<b>Council</b>	<b>Pegasus</b>	<b>Difference</b>
<b>Settlements</b>			
Croft (GB Release)	75	75	0
Culcheth (GB Release)	200	200	0
Hollins Green (GB Release)	90	90	0
Lymm - Warrington Rd (GB Release)	170	170	0
Lymm - Rushgreen Rd (GB Release)	136	136	0
Winwick (GB Release)	130	130	0
SHLAA (Sites 0.25Ha and above)	95	95	0

*Source: Appendix A and Appendix B of this note*

**Croft (GB Release)**

8.1 The Council’s housing trajectory suggests that 75 homes would come forward from Green Belt release at Croft. We have not considered the allocation(s) in Croft in detail at this stage although we reserve the right to comment further on this element on the housing land supply at examination.

**Culcheth (GB Release)**

8.2 The Council’s housing trajectory suggests that 200 homes would come forward from Green Belt release at Culcheth. We have not considered the allocation(s) in Culcheth in detail at this stage although we reserve the right to comment further on this element on the housing land supply at examination.

**Hollins Green (GB Release)**

8.3 The Council’s housing trajectory suggests that 90 homes would come forward from Green Belt release at Hollins Green. We have not considered the allocation(s) in Hollins Green in detail at this stage and have assumed that this number of homes could come forward in Croft in our housing trajectory. However, we reserve the right to comment further on this element on the housing land supply at examination.

**Lymm - Warrington Road (GB Release)**

8.4 The Council’s housing trajectory suggests that 170 homes would come forward from Green Belt release at Lymm – Warrington Road. We have not considered the allocation at Lymm – Warrington Road in detail at this stage and have assumed that this number of homes could come forward in Croft in our housing trajectory. However, we reserve the right to comment further on this element on the housing land supply at examination.

**Lymm - Rushgreen Road (GB Release)**

8.5 The Council’s housing trajectory suggests that 136 homes would come forward from Green Belt release at Lymm – Rushgreen Road. We have not considered the allocation in Lymm – Rushgreen Road in detail at this stage and have assumed that this number of homes could come forward in

Croft in our housing trajectory. However, we reserve the right to comment further on this element on the housing land supply at examination.

**Winwick (GB Release)**

8.6 The Council's housing trajectory suggests that 130 homes would come forward from Green Belt release at Winwick. We have not considered the allocation(s) in Winwick in detail at this stage and have assumed that this number of homes could come forward in Croft in our housing trajectory. However, we reserve the right to comment further on this element on the housing land supply at examination.

**SHLAA (Sites 0.25ha and Above)**

8.7 The Council's housing trajectory suggests that 95 homes would come forward from SHLAA sites at settlements. We have not been able to consider this element of the supply since it is not clear which SHLAA sites are included in this element of the supply. We have retained this within the supply for now but reserve the right to comment further on this element on the housing land supply at examination if more information becomes available.

**9. OTHER: SHLAA (SITES 0.25HA AND ABOVE)**

**Table 14: Comparison Between Council and Pegasus Housing Land Supply**

	<b>Council</b>	<b>Pegasus</b>	<b>Difference</b>
<b>Other</b>			
SHLAA (Sites 0.25Ha and above)	198	198	0

**Source:** Appendix A and Appendix B of this note

9.1 The Council’s housing trajectory suggests that 198 homes would come forward from other SHLAA sites. We have not been able to consider this element of the supply since it is not clear which SHLAA sites are included in this element of the supply. We have retained this within the supply for now but reserve the right to comment further on this element on the housing land supply at examination if more information becomes available.

**10. SMALL SITES ALLOWANCE: (SHLAA SITES UNDER 0.25HA)**

**Table 15: Comparison Between Council and Pegasus Housing Land Supply**

	<b>Council</b>	<b>Pegasus</b>	<b>Difference</b>
<b>Small Sites Allowance</b>			
SHLAA (Sites under 0.25Ha)	1458	1210	-248

**Source:** Appendix A and Appendix B of this note

- 10.1 SHLAA sites under 0.25ha are not assessed in the SHLAA. As such, a small sites allowance has been included in the suggested in the Council’s housing land supply. It is also noted that the Council expect a flat rate of 81 homes per annum from small sites through the Plan period, based on the past ten year average.
- 10.2 However, small sites are finite and the supply of homes from this source should naturally fall over time as sites get developed. It is therefore questionable whether any small sites would contribute to the housing land supply at a flat rate of 81 homes over the Plan period. As such, it is reasonable to apply a reduced rate of 50 homes per annum from 2031/2032.
- 10.3 Applying this assumption, reduces this element of the supply in the Plan period to 1,210 homes (i.e. **248 homes less than claimed**).



**11. CONCLUSIONS**

11.1 A comparison between the Council’s claimed housing land supply and ours is summarised in the table overleaf.

**Table 16: Comparison Between Council and Pegasus Housing Land Supply within the Plan Period**

	<b>Council</b>	<b>Pegasus</b>	<b>Difference</b>
<b>Wider Urban Area</b>			
SHLAA (Sites 0.25Ha and above)	6992	5230	-1,762
<b>Peel Hall</b>			
SHLAA Ref: 1506	1200	741	-459
<b>Waterfront</b>			
SHLAA Ref: 1541 (Parcel K7)	340	100	-240
SHLAA Ref: 1633 (Parcel K5)	730	570	-160
<b>Fiddlers Ferry Power Stn</b>			
Northern Parcel (GB Release)	860	0	-860
Southern Parcel (GB Release)	450	0	-450
<b>Garden Suburb</b>			
Option 2 (GB Release)	2430	1,776	-654
SHLAA Sites (HE consented)	772	772	0
<b>Top-up Sites</b>			
Thelwall Heyes (GB Release)	350	0	-350
Stockport Road (GB Release)	0	0	0
<b>Settlements</b>			
Croft (GB Release)	75	75	0
Culcheth (GB Release)	200	200	0
Hollins Green (GB Release)	90	90	0
Lymm - Warrington Rd (GB Release)	170	170	0
Lymm - Rushgreen Rd (GB Release)	136	136	0
Winwick (GB Release)	130	130	0
SHLAA (Sites 0.25Ha and above)	95	95	0
<b>Other</b>			
SHLAA (Sites 0.25Ha and above)	198	198	0
<b>Small Sites Allowance</b>			
SHLAA (Sites under 0.25Ha)	1458	1210	-248
<b>TOTAL</b>	<b>16676</b>	<b>11493</b>	<b>-5,183</b>

**Source:** Appendix A and Appendix B of this note

11.2 We have also compared our housing land supply with the housing requirement of 816 homes per annum as set out in the Plan and 945 homes per annum as the objectively assessed need, as shown in the table below. The housing land supply will not achieve the housing requirement for the Borough over the Plan period as a whole and on this basis ‘Policy DEV1 – Housing Delivery’ is **unsound**.

**Table 17: Housing Supply v Requirement over the Plan Period**

		Requirement / Supply	Requirement / Supply
A	Annual Target	816	945
B	2021 to 2038 (18 years) (Ax18)	14,688	17,010
C	Flexibility at 10% (10% of B)	1,469	1,701
D	Total Requirement (B+C)	16,157	18,711
E	Supply	11,493	11,493
	<b>Deficiency (D-E)</b>	<b>4,664</b>	<b>7,218</b>

- 11.3 The deficiency in the identified housing land supply results in a requirement for additional land to provide **4,664 homes** over the Plan period, against the local housing need of 816 homes per annum, or **7,218 homes** over the Plan period, with a housing requirement at 945 homes per annum.
- 11.4 For 'Policy DEV1 – Housing Delivery' to be found sound, more housing land is required to ensure the minimum housing needs of the Borough are met during the Plan period and to ensure there is sufficient choice and competition in the market for land, as per the requirements in Section 5 of the National Planning Policy Framework ("NPPF).
- 11.5 The shortfall represents an exceptional circumstance for further Green Belt release.
- 11.6 The inclusion of additional Green Belt release in south east Warrington and a return to the former Warrington Garden Suburb allocation would provide deliverable and developable land for housing development.
- 11.7 It would ensure all necessary physical and social infrastructure could be delivered in an appropriate and timely manner and would ensure the future long-term growth of Warrington and this part of the Borough is not jeopardised. Critical to housing delivery, the additional land proposed is all within private ownership and within the control of experienced land promoters and housebuilders including:
- Taylor Wimpey;
  - Bloor Homes;
  - Mulbury (Grappenhall) Limited (aka Mulberry Homes);
  - Hollins Strategic Land (aka Hollins Homes);
  - Langtree; and
  - Lone Star Land.
- 11.8 All of the above excel in bringing land to the market in a timely fashion and/or delivering new homes. This would allow for at least another six to seven outlets to commence on site within the enlarged allocation.

- 11.9 It is anticipated that the additional land proposed could deliver a further 171 homes per annum throughout the Plan period starting from 2025/2026. This is shown on our suggested housing trajectory which includes Warrington Garden Suburb and is on the basis that three additional outlets could be served on the larger site (based on an average of 57 homes per outlet). This would be on top of the anticipated outlets on Homes England land and Miller Homes land.
- 11.10 This would result in a peak delivery rate of **342** homes per annum across sales outlets during the Plan period albeit that peak would not be reached until 2031/2032. This is justified on the basis of the strength of the housing market in South Warrington, the range and number of developers with interests, and the scale of Warrington Garden Suburb (i.e. scope to serve different communities and neighbourhoods). To demonstrated that Warrington Garden Suburb could deliver at the peak delivery rate of 342 homes per annum it should be noted that Council’s previous housing trajectory in the first draft of the Regulation 19 WLP identified a peak delivery rate of 368 homes per annum suggesting that our proposed delivery rate is achievable.
- 11.11 Allocating the remaining land in the Warrington Garden Suburb area would deliver an additional **2,334 homes** over the Plan period. In total, Warrington Garden Suburb would deliver **4,110 homes** from Green Belt release including:
- 750 homes on Miller Homes land;
  - 1,026 homes on Homes England land; and,
  - 2,334 homes on the remaining land at Warrington Garden Suburb.
- 11.12 This represents an **increase of 1,680 homes** over the Council's suggested housing trajectory of 2,430 homes from Green Belt release at South East Warrington Urban Extension. Our housing trajectory (with remaining land at Warrington Garden Suburb) shows a total housing land supply of 13,827 homes.
- 11.13 This would reduce the deficiency identified in the housing land supply to **2,330 homes** over the Plan period, against the local housing need of 816 homes per annum, or **4,834 homes** over the Plan period, with a housing requirement at 945 homes per annum.

**Table 18: Housing Supply v Requirement over the Plan Period (including remaining land at WGS)**

		<b>Requirement / Supply</b>	<b>Requirement / Supply</b>
A	Annual Target	816	945
B	2021 to 2038 (18 years) (Ax18)	14,688	17,010
C	Flexibility at 10% (10% of B)	1,469	1,701
D	Total Requirement (B+C)	16,157	18,711
E	Supply (including remaining land at WGS)	13,827	13,827
	<b>Deficiency (D-E)</b>	<b>2,330</b>	<b>4,884</b>