

Proposed Submission Version Local Plan

PART A - About You

1. Please complete the following:

Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.

Name of person completing the form: Lindsey Smith

Email address: [REDACTED]

2. What type of respondent are you? Please select one option only.
If you are an agent please select the type of client you are representing.

Other (please specify):
Registered Provider of Social Housing

3. Please provide your contact details:

	Contact details
Organisation name (if applicable)	Torus
Agent name (if applicable)	-
Address 1	[REDACTED]
Address 2	[REDACTED]
Postal Town	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]

PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

DEV1 Housing Delivery

2. What does your comment relate to? Please select one option.

Both of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).

point 5 - minimum densities for new residential development

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant	X	
Sound		X
Compliant with the Duty to Co-operate	X	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Torus is a registered provider of social housing, owning circa 9,000 homes within the Warrington Borough. It is a key partner in the delivery of homes within Warrington town centre and has already committed to two apartment schemes at Academy Way (144 units) and Palmyra Square (29 units) for the rent to buy market. It has also acquired the Mr Smith's site in the Town Centre Riverside quarter (as defined in the Town Centre SPD), with a view to delivering additional new homes in the future to meet local needs.

Concern is expressed in relation to point 5 of policy DEV1 which sets out minimum densities for new residential development. With specific regard to development within the town centre, it is clear that the densities proposed are aimed towards high-rise development with limited car parking provision, yet at the time of writing no market intelligence has been published around the scale of development that the market can support. Consequently, it is believed that important questions around what a sustainable community should comprise including details around overall market capacity, the correct balance between houses and apartments, preferred tenures and product types still need to be addressed before densities should be set. The minimum densities set out in the Local Plan for the town centre (130 dwellings per hectare) are believed to be aspirational and could have the unwanted effect of raising expectations in terms of land value which will in turn challenge viability. The density set for the town centre would also rule out the provision of family homes e.g. town houses, which would be well very placed in some of the outlying areas of the town centre creating active frontages more in tune with the scale of existing properties. It should also be noted that as a landlord and land owner, Torus does not have a preference for high-rise apartment schemes as they are more difficult to manage and maintain.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

The lack of an evidence base casts doubt on the soundness of the policy and it is therefore recommended that more evidence should be gathered by the Council to support the densities proposed. In the absence of an evidence base, Torus would recommend a more cautious approach to dealing with densities with more of a focus on delivering the correct mix of homes to build sustainable communities which meet local needs. It is recommended that the density of 130 dwellings per hectare for the town centre should be removed or at the very least reduced to allow for this.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

You have just completed a Representation Form for DEV1 Housing Delivery.

Please select what you would like to do now?

Complete another Representation Form on a different policy or part of the plan (**Part B**)

PART B - Representation Form 2

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

DEV2 Meeting Warrington's Housing Needs

2. What does your comment relate to? Please select one option.

Both of the above

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant	X	
Sound		X
Compliant with the Duty to Co-operate	X	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

Torus is a registered provider of social housing, owning circa 9,000 homes within the Warrington Borough. It is also a Homes England Strategic Partner with an ambitious development programme and is committed to delivering new homes in Warrington.

As a whole, Torus supports policy DEV2 which seeks the provision of additional affordable homes within the Borough.

Torus does, however, have some concerns including:

1. The Local Housing Allowance cap on affordable rents at part 5 of the policy - Whilst Torus clearly supports the requirement for rents to be set at an affordable level, there will be sites in some parts of the Warrington borough where this could test viability and could potentially deem what could have been an 100% affordable scheme undeliverable.
2. The emphasis on First Homes at point 6 of the policy, with a requirement for at least 25% of affordable homes to be delivered as this product - It is difficult to understand from the policy how this fits into overall affordable housing provision i.e. the 20% -30% as set out in parts 1-3 of the policy. It is also difficult to understand the implications of the requirement for First Homes on the provision of other affordable products such as shared ownership, rent to buy and affordable rent which most RPs favour.
3. The requirement at point 18 to provide housing for older people on all sites of 10 dwellings or more - It is believed that this is an unrealistic and undeliverable expectation that could potentially stretch viability on some schemes. Similarly, the same concern applies to the optional standards at points 15 and 16 of the policy, which requires all homes to meet M4(2) as standard with 10% meeting of new homes meeting M4 (3). It is noted, however, that in this case evidence can be provided to justify a lower level of provision where the requirements are not technically or viably feasible.
4. The reference that is made to 'genuinely affordable' discounted market housing at part 7 of the policy - Further clarification is required around what a 'genuinely affordable' product is for the avoidance of doubt.

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

1. LHA Cap - In order to ensure that this policy requirement is sound, more evidence needs to be collated by the Council to ensure that the LHA cap on affordable rents is appropriate on all sites across the Borough and that it will not lead to the delivery of new homes in areas with more marginal values becoming unviable/ undeliverable. Consideration should be given to whether this policy needs to apply to 100% affordable schemes where a registered provider has been nominated, noting that the definition of an affordable rent product from a Homes England perspective is 80% of market rent. Thought to be given to whether a mechanism should be referenced within the policy to allow for viability assessments to be submitted to the Council to demonstrate why this may not be achievable in some locations.

2. First Homes – Whilst it is understood that the requirement to deliver 25% First Homes on housing sites is a national policy objective, it is hard to support this part of the policy due to the implications that this is likely to have on the delivery of other affordable products such as homes for affordable rent, shared ownership and rent to buy. Torus, like many RPs, relies on the acquisition of s106 units to support its ambitious development programme and is concerned that the availability of such units will reduce. Further research to be undertaken into whether the market supports the delivery of the 25% First Homes target and whether this percentage needs to be rigidly applied to all sites at the expense of other affordable tenures. As has been noted above, more clarity to be given to where the requirement for 25% first homes sits in terms of the overall provision of affordable homes on a site as set out in points 1-3 of the policy.

3. Housing for older people - In order to ensure that this policy requirement is sound, more evidence needs to be collated by the Council to ensure that the requirement to provide housing for older people on schemes of more than 10 units is appropriate on all sites across the Borough and that it will not lead to schemes becoming unviable/ undeliverable. Consideration should be given to whether a mechanism should be referenced within the policy to allow for viability/ technical assessments to be submitted to the Council to demonstrate why this may not be achievable in some locations. Further clarification also needs to be provided around the definition of homes for older people. The supporting text to the policy refers to this taking many forms including 'adaptable homes'. Adaptable homes can take many forms and so it is suggested that if this requirement needs to stay in the policy that the definition should not be any more onerous than the M4(2) accessible and adaptable dwelling standard.

4. Discounted Market Housing - Further clarification is required around what a 'genuinely affordable' product is and how this will be calculated for the avoidance of doubt.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

to expand upon the written representations

You have just completed a Representation Form for DEV2 Meeting Warrington's Housing Needs.

Please select what you would you like to do now?

Submit response (I am a Developer / Landowner / Group / Organisation)