



WARRINGTON
Borough Council

Warrington Borough Council Local Plan

Strategic Housing Land Availability Assessment 2024

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Introduction and Policy Background

- 1.1 This report presents the findings from Warrington's 2024 Strategic Housing Land Availability Assessment (SHLAA). **It has been prepared from a base date of 1st April 2024 and the information contained in it is correct as of that date.** The 2024 SHLAA comprehensively updates the previous 2023 assessment by reviewing the status and conclusions previously reached for sites already within the SHLAA process and assessing new sites, which have emerged. It does not include the supply beyond 15 years. However, this has been included in the adopted Local Plan¹ housing trajectory. **It should be noted that this SHLAA includes the supply from sites that have been allocated in the recently adopted Warrington Local Plan 2021/22-2038/39.** The Council adopted its new Local Plan on 4th December 2023. This Plan allocates several former Green Belt sites for housing development.
- 1.2 It is a key component of the evidence base to support the delivery of sufficient land for housing; to meet the borough's need for more homes; and for monitoring the housing policies within the Warrington Local Plan.
- 1.3 The 2024 SHLAA report is structured around the following sections:
- Introduction and background - Identifies what the SHLAA is and why it has been prepared.
 - Assessment methodology - Explains the methodology, which has guided the assessment, including the assumptions that have been applied as part of individual site assessments.
 - Assessment findings - Presents the core outputs and wider findings from the assessment.
 - Conclusions – Sets out the conclusions arising from the study including any policy implications and next steps.
 - Individual site pro-formas - Identify the relevant detail of assessments on a site by site basis.
 - Appendices - supplementary information and supporting evidence of relevance to the report.
- Policy Background
- 1.4 The 2024 SHLAA has been prepared in accordance with the revised National Planning Policy Framework² (NPPF) and Planning Practice Guidance launched on 6 March 2014 (with subsequent updates³).
- 1.5 The NPPF requires local planning authorities to ensure that their Local Plan is based on adequate, up-to-date, and relevant evidence about the economic, social, and environmental characteristics and prospects of their area. The NPPF (paragraph 69

¹ The [Warrington Local Plan 2021/22-2038/39](#).

² The [National Planning Policy Framework \(DLUHC, Dec 2023\)](#).

³ Takes account of Planning Practice updates to February 2024 ([housing supply and delivery](#)).

specifically) requires that a SHLAA is undertaken by local planning authorities and that from this:

"planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability."

- 1.6 In addition, paragraph 69 requires local planning authorities, through strategic policies, to identify a supply of specific, deliverable sites⁴ for years one to five of the plan period; and specific, developable sites⁵ or broad locations for growth, for at least a further 5 and where possible 10 years from the date of adoption of Local Plans. Paragraph 75 requires strategic policies in a local plan to include a trajectory illustrating the expected rate of housing delivery over the plan period, and to consider whether it is appropriate to set out the anticipated rate of development for specific sites. It also requires local planning authorities to monitor their deliverable land supply against their housing requirement, as set out in adopted strategic policies.
- 1.7 Paragraph 76 indicates that Local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing for decision making purposes if the following criteria are met:
 - a) their adopted plan is less than five years old; and
 - b) that adopted plan identified at least a five-year supply of specific, deliverable sites at the time that its examination concluded.
- 1.8 Whilst, paragraph 77 requires local planning authorities to identify and update annually a minimum of five years' worth of supply of deliverable sites measured against their housing requirement set out in adopted strategic policies, or against their local housing need where strategic policies are more than five years old (or a minimum of four years' worth of housing if the provisions in paragraph 226 apply).
- 1.9 The purpose of the SHLAA therefore, is to understand the level of housing potential within the Borough and to identify sites, which are considered to be suitable for housing and likely to be developed. Its primary role is to:

⁴ To be considered deliverable, sites should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular: (a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans); and (b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years (definition taken from Appendix 2 of the NPPF).

⁵ To be considered developable, sites should be in a suitable location for housing development, and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged (definition taken from Appendix 2 of the NPPF).

- Identify sites with potential for housing;
- Assess their suitability for housing;
- Identify any constraints to development; and
- Conclude whether suitable sites are deliverable and available for allocation if needed.

1.10 The SHLAA informs on the “deliverable” and “developable” aspects of specific sites by providing information and an evidence base. It must be noted that the SHLAA does not allocate sites, that role is filled by the Local Plan. Its purpose is instead to collect and collate information that provides a snapshot of each site’s development potential.

Disclaimer

The Strategic Housing Land Availability Assessment provides evidence, alongside other studies, to inform the allocation of land through the Local Plan. It assesses whether sites are suitable for housing, provided they are not required for other purposes, to meet plan targets. It identifies constraints to development and considers how they might be overcome.

The inclusion of a particular site in the assessment should not, therefore, be taken as an indication that it will be allocated or granted planning permission for housing or any other form of development.

2 Assessment Methodology

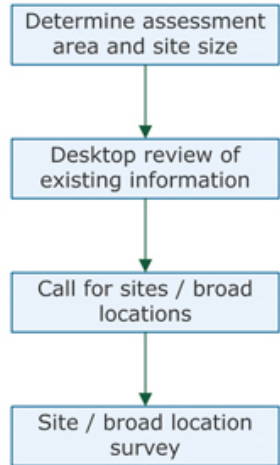
2.1. Planning Practice Guidance⁶ identifies a number of standard outputs that should emerge from the assessment process in the interest of consistency, accessibility and transparency as follows:

- **a list of all sites or broad locations** considered, cross-referenced to their locations on maps.
- **an assessment of each site or broad location**, including:
 - where sites have been discounted, **evidence justifying the reasons for discounting**.
 - where sites are considered suitable, available, and achievable, **the potential type and quantity of development, including a reasonable estimate of build out rates**, setting out how any barriers to delivery could be overcome and when.
- **an indicative trajectory** of anticipated development based on the evidence available (and consideration of associated risks).

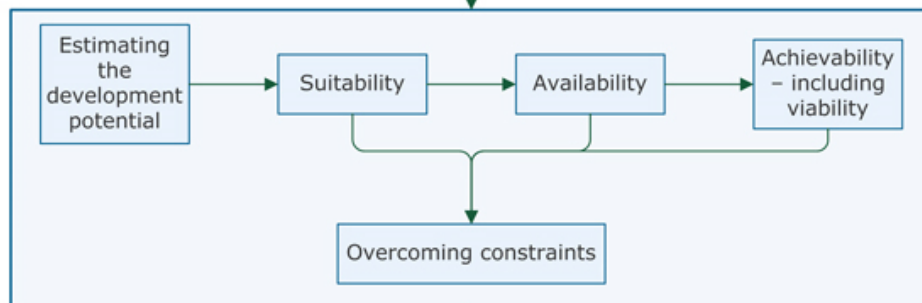
2.2. The structure of the 2024 SHLAA report (as set out at paragraph 1.3) has been prepared to ensure that the required outputs are included and is informed by the process within Planning Practice Guidance as set out on the following page (Fig 2.1).

⁶ The Planning Practice Guidance (MHCLG), Housing and economic land availability assessment, Paragraph: 026 Reference ID: 3-026-20190722

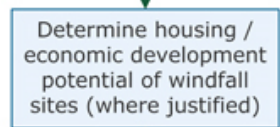
Stage 1- Site / broad location identification



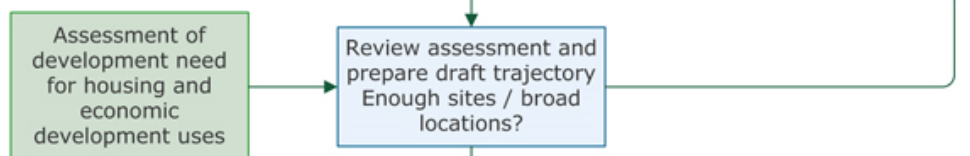
Stage 2 - Site / broad location assessment



Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base

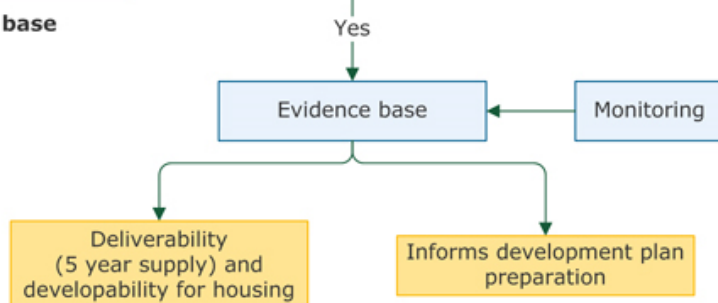


Figure 2.1: SHLAA Process (taken from the Planning Practice Guidance)

Stage 1: Identification of broad location and sites

Determining the Assessment Area

- 2.3. The Planning Practice Guidance⁷ recommends that the area selected for assessment should be set at the plan-making area level.
- 2.4 In 2007 Warrington, Halton and St. Helens Councils were identified as being in the Mid-Mersey (or "Eastern") Housing Market Area (HMA), in the Liverpool City Region Housing Strategy. Between July 2008 and March 2011, the three authorities were part of the Mid-Mersey Growth Point, which aimed to increase the delivery of housing in the sub-region. The authorities developed a joint agreed approach to their housing evidence base including each authority's SHLAA. The three authorities agreed to continue joint working to provide a Growth Point legacy to be reflected in their respective Local Plans.
- 2.5 In 2015 the Council, in partnership with Halton and St. Helens Councils commissioned GL Hearn to prepare a Mid-Mersey Strategic Housing Market Assessment (SHMA), which was published in January 2016. The SHMA reaffirmed that the Mid-Mersey was still the appropriate geography (Housing Market Area - HMA) upon which to assess housing need.
- 2.6 Following on from this the Council produced an independent Local Housing Needs Assessment (LHNA)⁸ in line with revised National Planning Policy Framework (NPPF - 2018 and subsequently 2019). The LHNA was updated once more in 2021. As with previous work the LHNA uses the HMA as defined in previous versions of the Mid-Mersey SHMA.
- 2.7 Whilst, each authority produces an independent SHLAA report, they continue to follow a number of key principles. This SHLAA, therefore, covers the borough of Warrington only.

Stakeholder Engagement

- 2.8 From the outset each of the Mid-Mersey authorities were committed to ensuring that their SHLAAs have developed in partnership with the development industry and stakeholders of relevance. Regular stakeholder engagement meetings were undertaken up to August 2014 to ensure a degree of consistency exists between the assumptions underpinning each respective authority's SHLAA. Since then, the Regulation 18 and 19 consultation exercises on; the Scope of the Local Plan Review in Oct 2016; the Preferred Development Option (PDO) consultation in July 2017; the Proposed Submission Version Local Plan (PSVLP) consultation in May/June 2019; the Updated Proposed Submission Version Local Plan (Updated PSVLP) consultation in Oct/Nov 2021 and the Matter Statements submitted to the examination in public in

⁷ The Planning Practice Guidance (MHCLG), Housing and economic land availability assessment, Paragraph: 006 Reference ID: 3-006-20190722.

⁸ [Warrington Borough Council Local Housing Needs Assessment, GL Hearn, March 2019](#) and [Warrington Local Housing Needs Assessment Update, GL Hearn, August 2021](#).

July 2022 have been used to engage with stakeholders and seek their views on the Council's assessment of its housing land supply.

Determining sites to be included in the Assessment

Site Size

- 2.9 The 2024 SHLAA format is consistent with last year's SHLAA and takes account of recommendations contained in the National Planning Practice Guidance (PPG) in respect of site size. The PPG recommends that all sites and broad locations capable of delivering five or more dwellings should be considered; and where appropriate alternative size thresholds can be considered⁹.
- 2.10 The Council has chosen to use an alternative size threshold that corresponds with that used by St Helens Council in their SHLAA's since 2017¹⁰, to ensure consistence with data across the Housing Market Area. Hence, a physical **minimum site size threshold of 0.25 hectares** has been applied to help facilitate the identification of sites. This has been chosen because it does not make assumptions about the density or development typology of a site prior to including the site in the assessment. This also reflects the criteria in the *Town and Country Planning (Brownfield Land Register) Regulations 2017*¹¹ that came into force on 16th April 2017, on the approach to maintaining a brownfield land register, which indicates that a threshold of 0.25 hectares is appropriate.

Identification of Sites

- 2.11 Sites have been submitted to the Council on an ongoing basis over several years since SHLAAs were first introduced. The most recent "Call for sites" was in October 2016 as part of the Regulation 18 consultation exercise on the Scope of the Local Plan Review. A second Regulation 18 consultation on the Preferred Development Option (DPO) also enabled new sites to be submitted or existing sites amended, as part of the process. In addition, Call for Sites forms are available on the Council's website to enable landowners/promoters to submit sites on an annual basis.
- 2.12 Sites contained in previous versions of the SHLAA that have not been developed have been included within this year's site assessment exercise, applying the site size threshold of 0.25 ha as detailed above, to sift out the 'small sites'. Following on from this, an allowance has been made for residential units delivered on small sites below the threshold of 0.25ha. More detail on this is included later in this report.
- 2.13 In addition to direct nominations, an assessment was undertaken of those sites already in the planning process including:
- Planning permissions for residential developments that are under construction;

⁹ The Planning Practice Guidance (MHCLG), Housing and economic land availability assessment, Paragraph: 009 Reference ID: 3-009-20190722.

¹⁰ See [St Helens BC SHLAA 2024](#) (Page 7/8).

¹¹ [The Town and Country Planning \(Brownfield Land Register\) Regulations 2017](#).

- Unimplemented planning permissions for residential development;
- Those sites currently subject to, or with a known history of, pre-application discussions for residential development; and
- Land allocated for employment or other land uses, which are no longer required for those uses.

2.14 The sources below, have been used to identify further sites for inclusion within and assessment through the SHLAA process:

- Sites that have previously benefited from a planning permission but which have since expired;
- Known vacant and derelict land including those sites on the National Land Use Database;
- Surplus public sector land;
- Vacant buildings suitable for conversion;
- Land in non-residential use which may have redevelopment potential;
- Under used garage blocks in residential areas;
- Large scale redevelopment opportunities arising from the Council's Regeneration Framework and associated masterplans; and
- Sites identified from visual surveys/site visits and local knowledge.

2.15 Each site identified has been individually mapped and assigned a unique reference number as part of the recording process that is used in the preparation of the individual site pro-formas in Appendix 1. Those rolled forward from the 2023 assessment have retained their previous unique reference number for continuity.

Site Surveys

2.16 The site survey process was carried out in line with the advice provided in the PPG, checking the following site characteristics:

- Site size, boundaries and location;
- Current land use and character;
- Land uses and character of surrounding area;
- Physical constraints (eg access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure and utilities);
- Potential environmental constraints;
- Where relevant, development progress (eg ground works complete, number of units started, number of units completed); and
- An initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.

2.17 In addition, sites were screened for policy constraints that might preclude development. This is undertaken through an initial assessment of suitability against national policies and local policies/designations to establish only the sites, which have reasonable potential for residential development and produced a reduced list of sites

to be taken forward in the assessment and be subject to more detailed site assessment.

- 2.18 This initial assessment of policy constraints identified a significant group of sites, which are located within the Green Belt. Taking account of the advice in the NPPF¹² regarding overriding constraints on the use of land, such as Green Belt the Council considers that the assessment review process within the SHLAA cannot reasonably conclude that policy constraints relating to the Green Belt can be overcome on a site-by-site basis. In such circumstances, it is considered premature for the SHLAA to endorse specific sites in the Green Belt as suitable for residential development outside of a review of the Local Plan.
- 2.19 186 sites located within the Green Belt have therefore been recorded as unsuitable within the assessment and categorised as constrained for the purpose of identifying a supply of deliverable or developable sites for residential development. The only exception to this is those sites that are based on the principle of converting an existing building or other form of appropriate development as defined by paragraphs 154 and 155 of the NPPF and which are over the site size threshold of 0.25 ha.
- 2.20 The full list of sites considered to be constrained, and therefore not taken forward to detailed site assessment, together with the reason for each conclusion at a site level, is provided within Appendix 2.

Stage 2: Approach to Site Assessments

- 2.21 The purpose of stage 2 of a SHLAA is to establish whether the identified sites are “deliverable” or “developable”. The NPPF explains what each of these terms means:

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

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

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

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

¹² NPPF (2023); Paragraphs 144 to 146

- 2.22 To inform conclusions on the deliverability/developability of sites (established as having reasonable potential for development at Stage 1), to ensure that all sites have been assessed on a consistent basis, information has been recorded within a spreadsheet and then summarised on a standard proforma for each site (see Appendix 1). The information contained in the spreadsheet has been guided by the Planning Practice Guidance and is broadly consistent with previous SHLAAs.
- 2.23 The information within the individual site assessments has been used to establish the development potential of each site. The individual assumptions used for assessing whether a site is “deliverable” or “developable” are outline below. Comments from the Updated PSVLP 2021 consultation process and the Examination in Public, Matter Statements (2022) have been reviewed and amendments to assessment assumptions made were appropriate.

Estimating Development Potential

- 2.24 In view of the Stage 1 assessment, whilst the whole borough is initially within the remit of the SHLAA assessment in relation to the identification and recording of sites, the focus of detailed site assessments is up on:
- Sites within the settlement boundary of the town of Warrington.
 - Sites within Inset or Green Belt settlement boundaries as defined within the recently adopted Warrington Local Plan 2021/22-2038/39.
 - Sites within the Green Belt, which propose the conversion of existing buildings or other form of appropriate development as defined by paragraphs 154 and 155 of the NPPF.

Assessing Suitability

- 2.25 When assessing sites suitability for residential development the following factors have been considered:
- Is the site subject to any development plan designations and if so, can these be mitigated?
 - Is development likely to be precluded by land contamination or poor ground conditions?
 - Is development likely to be precluded by flood risk or by increasing the risk of flooding elsewhere?
 - Whether the site be safely and conveniently accessed?
 - Whether surrounding land uses preclude residential development?
 - Whether the site is within a hazardous installation or statutory consultation zone?
 - Whether the site be developed without a detrimental impact on the amenity of adjacent occupiers and to ensure a sufficient level of amenity for potential occupiers?
 - Whether the site can be considered sustainable in locational terms by way of

easy and convenient access to essential facilities and services by means other than the private car?

Suitability Assumptions

2.26 When assessing suitability, a number of assumptions have had to be made for some of the criteria employed, these include:

- Allocated or committed employment land - Where a site within the SHLAA is located within a designated employment area, the site has been recorded as being constrained (except where residential would contribute to a regeneration priority). Where a site currently has an extant consent for employment development but is not within a designated employment area, the key issue is whether the site can be considered available for housing i.e. how likely is it that the employment related approval will be implemented?
- Contaminated land and ground conditions - There are numerous examples within the Borough of where the challenge posed by land contamination and/or ground conditions have been successfully overcome to facilitate residential development. In contrast there are very few sites where contamination and/or ground conditions have been the sole factor that has prevented residential development. In most cases the key issue is not whether a site can be adequately remediated but instead whether it can be done so viably. It has therefore been assumed, unless information was available to suggest otherwise, that the presence of contamination would not render a site unsuitable.
- Flood risk - All SHLAA sites included in the 2017 SHLAA update, and sites received as part of the Council's Local Plan Review 'Call for Sites' exercise have been screened for their risk of flooding from Fluvial, Tidal and the risk of flooding from surface water as part of the Strategic Flood Risk Assessment (SFRA) (2018). The outcomes of the SFRA screening assessment are contained in the Council's Level 1 - SFRA (2018) and Level 2 - SFRA (2019), associated flood risk maps and the site assessment screening spreadsheet, which can be viewed from the link below: [Evidence base - Proposed Submission Version Local Plan 2021](#). Whilst the SFRA identified that each SHLAA site will potentially have its own requirements in relation to managing flood risk and there will be a need to carry out a flood risk assessment for a significant number of development sites within Flood Zones 1, 2 and 3, in most cases it has been assumed that this would not preclude development. However, a number of sites that contained a significant portion of the site within FZ3b were deemed unsuitable for residential development due to the risk of fluvial and/or surface water flooding.
- Accessibility - The criteria for assessing the accessibility of sites for new residential development have been updated to refer to the accessibility criteria used in the SA Report for the UPSVLP (2021) - Appendix A (Site Appraisal Framework) (Page 238)¹³. The SA Report identified the key sustainability issues through a scoping exercise. Eighteen SA objectives were established, as a result of the scoping process. "*Reduce the need to travel, especially by car, improve choice and the use of more sustainable modes*" was identified as one of these objectives. The criteria

¹³ [Warrington Local Plan Sustainability Appraisal: SA Report, AECOM, August 2021](#).

for assessing this objective have now been used to assess to accessibility of sites to bring the SHLAA in line with the emerging local plan and current standards on determining accessibility. The criteria are based on access to a GP; Primary School; Secondary School; regular bus service and a train station.

- 2.27 Broader suitability considerations such as amenity, open space, infrastructure, landscapes, nature conservation, heritage, pollution and hazardous risks are necessarily assessed on a site-by-site basis as appropriate.
- 2.28 Where sites have been deemed to be unsuitable a clear explanation has been offered as to why within the individual proformas. The revised criteria for assessing the accessibility of sites have not altered the suitability of any sites.

Assessing Availability

- 2.29 To be considered, 'available' for development the Practice Guidance identifies that a site should be free of legal or ownership problems. In essence, this means there is a willing landowner or developer in control of the site.
- 2.30 The decision on whether a site was considered available was based on the following factors:
- Whether there was an extant planning consent and if so whether this had been implemented;
 - Whether the site was in active use;
 - Whether the site could be developed now; and
 - Whether the site was free of ownership and tenancy issues.
- 2.31 If a site benefits from a valid planning consent, then it has been assumed, in the absence of any information to suggest otherwise, that the site is available. This assumption is regardless of whether the site is in active use or not unless there was a known tenancy issue. If a site without planning permission was being promoted by a landowner or developer and was in active use, then it has been assumed that the site could not be considered available at this time but may become available in the future. In applying these assumptions, the Council has reviewed the planning history of sites in terms of unimplemented permissions and adjusted the conclusion on availability accordingly.
- 2.32 Whether the site could be developed now or not relates to whether the site is vacant and if it has been cleared and is free from the need for any further demolition. The Council have taken a lenient approach to this element of the availability assessment using it to inform as opposed to directly dictate a decision on availability. This is through recognition that whilst some sites still require clearance and demolition, this stage of the development process can be completed relatively quickly.
- 2.33 All sites were considered to be free from ownership or tenancy issues unless there was specific evidence/information to the contrary.

- 2.34 Sites where an extant consent for an alternative land use has been implemented are evidently no longer available and are therefore recorded as constrained; excluded from land supply calculations and will be removed from future SHLAA's. Where an extant consent for an alternative use has not been implemented a judgement has been made as to whether the alternative consent is likely to be implemented and if the site should be retained in the available supply.
- 2.35 Where, it was concluded that sites could not be considered available at this time, consideration was given to the likelihood of the site becoming available in the future.

Assessing Achievability

- 2.36 The Planning Practice Guidance¹⁴ advises that a site can be considered achievable where there is a reasonable prospect that housing will be developed on the site at a particular point in time. It identifies that achievability is essentially a judgement about the economic viability of a site, and the capacity of a developer to complete and sell the housing over a certain period. Market, cost, and delivery factors are all important considerations when assessing whether a site can be considered achievable.
- 2.37 The Council's LHNA Update (2021) is based on local research and published data to quantify housing need, demand, and an understanding of how the local housing market works. The findings of the LHNA indicate that there is significant demand for additional homes (both market and affordable) within Warrington, together with an indication of the types and tenures of homes for which there is strong latent demand.
- 2.38 In assessing whether the demand translates to achievability, the Council published a Local Plan Viability Assessment (2021)¹⁵. This study explored the economic viability of a range of site types across differing locations within the Borough, utilising assumptions on developable area and density, which are consistent with the SHLAA methodology. Following consultation on the Updated PSVLP 2021 the Council produced an addendum to the Viability Assessment to respond to detailed viability issues raised during the consultation. The findings of this viability work, together with housing need and demand identified in the LHNA 2021, have been used to assess site achievability together with consideration of the following factors:
- Whether there is active developer interest in the site?
 - Whether there is known demand for the form of provision approved/proposed?
 - Whether similar sites have been successfully developed in the preceding years?
 - Whether there are any known abnormal development costs?
- 2.39 Warrington has had a consistently strong housing market in recent years, with levels of housing completions remaining resilient notwithstanding the economic downturn

¹⁴ The Planning Practice Guidance (MHCLG), Housing and economic land availability assessment Paragraph: 020 Reference ID: 3-020-20190722

¹⁵ [WBC Emerging Local Plan Viability Assessment \(Aug, 2021\)](#)

and subsequent recovery since 2008. Monitoring has shown that sites continue to yield completions and that importantly developers continue to commence sites for which they have obtained planning approval.

- 2.40 The Council's viability evidence suggests that the majority of residential development in Warrington is viable, taking into account the policy asks within the Local Plan. The Council acknowledges there may be viability issues relating to development in the town centre in the short to medium term. The Council, however, continues to assist developers where possible to help ensure housing delivery remains viable and practical in the short term. The flexibility offered by the Council has allowed the negotiation of S106 agreements where appropriate and has offered a number of options for developers, including deferred payment and instalments that help ensure their developments remain achievable in both the short and long term.
- 2.41 It is the Council's opinion that achievability should take a long-term view. This is in keeping with Government advice that viability assessments and related work should ignore extremes within the market. Whilst some high-density apartment schemes have been considered unachievable in Warrington since 2008/9, recent evidence indicates that this situation has changed, and they are once again achievable.
- 2.42 In reaching conclusions on the achievability of sites, the Council consider that historical trend information and development experiences are important. Prior to the development boom, which characterised housing development from 2005 onwards there were several development sites within the Borough that were widely perceived as unattractive/unviable and hence unlikely to be developed. The potential of many of these sites has however been realised and the ability of the development industry to adapt and deliver in the longer term cannot therefore be overlooked.

Overcoming Constraints

- 2.43 The Planning Practice Guidance advises that where it is unknown when a site could be developed, then it should be regarded as not currently developable. Therefore, where constraints are considered to be severe and there are insufficient assurances to demonstrate if or when they can be overcome, sites have simply been recorded as 'constrained'.
- 2.44 Where sites have been categorised as 'constrained', the specific constraint(s) and the action needed to overcome these has been documented. Progress on the resolution of any constraints is recorded and the site assessment updated annually.

It should be noted that the onus is on the landowner/developer to demonstrate that any documented site specific constraints can be overcome.

Estimating Potential Yield/Capacity

- 2.45 The potential number of dwellings that can be delivered on a site is referred to as the yield or capacity, which is influenced by the site size, the net developable area, and the density of development. The estimated yield/capacity for a site in the SHLAA is a desk-based assumption regarding the potential amount of development that can be accommodated on a site. However, this is indicative and should not be taken to mean that this is a maximum or minimum figure.
- 2.46 When assessing the capacity of each site a cautious approach has generally been observed, this is in keeping with both Planning Practice Guidance and the current expectations of stakeholders. To ensure a transparent approach when estimating the development potential of each site, individual assessments include commentary to make clear the rationale behind the assigned capacity.
- 2.47 In the July 2019 update to the planning practice guidance the Government included guidance on the need to include housing for older people in the housing (including residential institutions in Use Class C2) land supply based on the amount of accommodation released in the housing market¹⁶.
- 2.48 MHCLG through their dwelling definition in the Housing Flow Reconciliation returns form and guidance notes have provided clarity to local authorities in how to deal with student accommodation and communal accommodation in their assessment of completions (see link: [Dwelling stock data: notes and definitions](#)). The Housing Delivery Test Measurement Rule Book indicates that adjustments for student and other communal accommodation will be calculated by MHCLG and added to the Housing Delivery Test result to calculate the “net homes delivered”. The rule book indicates that adjustments will be applied using two nationally set ratios, based on England census data. The ratio applied to communal accommodation, other than students, is based on the national average number of adults in all households at 1.8¹⁷.
- 2.49 This ratio has been used to estimate the net number of homes provided by bed spaces created in forms of communal accommodation, such as care homes for older people and other specialist care provision.

Developable Area Assumptions

- 2.50 This adjustment recognises that larger sites will need to provide areas of open space; landscaping; and potentially on-site infrastructure and therefore have reduced developable areas. Following analysis of evidence presented at Appendix 3, developable area ratios, as set out in Table 2.1 below, have been used. These ratios have been applied where detailed information from a planning permission is not available or no information has been provided by a landowner/developer. In addition, in circumstances where there is specific evidence of constraints on part of the site or where housing would form part of a wider mixed-use development, the developable

¹⁶ The Planning Practice Guidance (MHCLG), Housing Supply and delivery – Counting other forms of accommodation Paragraph: 035 Reference ID: 68-035-20190722.

¹⁷ The Housing Delivery Test Measurement Rule Book (MHCLG), Housing Delivery Test Calculation Paragraphs 9 and 11.

area ratio has been treated as a guide only and has been further reduced as part of the assessment where appropriate.

Net Developable Area Ratios			
Site Size	Less than 0.4 ha	0.4 ha to 2ha	Over 2ha
Gross to Net Ratios	100%	90%	75%

Table 2.1: Net Developable Area ratios for different scales of development

Density Assumptions

- 2.51 Evidence and sensitivity testing (see Appendix 3) suggests a density range, of between **30-50 dwellings per hectare (dph)** applied to the net developable area of a site is generally appropriate when estimating capacity for sites without planning permission or where a developer/landowner has not offered specific details.
- 2.52 In addition, as a result of comments made in the Local Plan Preferred Development Option (PDO) Consultation, the Council has reviewed the density of previous and recently consented development in the inner area of Warrington compared to the suburban areas. This has revealed that apartment schemes (except for Care Home facilities) are predominantly confined to the Town Centre and Inner Warrington (as defined on the UPSVLP (2021) Policies Map) and that there is a differential between the density of this type of scheme within these two locations. Whilst there is a range of densities in both locations, the density of development in the Town Centre and surrounding area is, unsurprisingly, generally higher than in the wider Inner Warrington area. It is considered that taking the average density in these two locations provides a reasonable assumption up on which to calculate the capacity of schemes in these locations, where it is considered likely that apartment development will occur. Consequently, in appropriate locations in the **Town Centre a density of 300dph** has been applied, whilst in appropriate locations outside of the town centre but within **Inner Warrington a density of 130dph** has been applied. The table in Appendix 4 provides the evidence to justify this approach and has been updated to take into account recent permissions and to identify which sites have been completed/delivered. When the average density of recent permissions is taken into account the average density for the Town Centre has increased to over 320dph, whilst the average for Inner Warrington has decreased slightly to 129dph. Therefore, it is considered that it is still appropriate to retain the original Inner Warrington density for apartment schemes in this area but the standard/default density assumption for sites within the Town Centre has been increased to 300dph to reflect recent evidence (and taking a conservative approach).
- 2.53 These density parameters are now reflected in Policy DEV 1 of the recently adopted Warrington Local Plan 2021/22-2038/39, which specifies minimum densities for development in all areas of the borough. However, as previously agreed with stakeholders, some flexibility is applied dependent on the characteristics of a site and the area where it is located. For example, whether a site is brownfield or greenfield; any policy designations (ie. conservation areas); the surrounding land uses, and

density of development have been used to inform an assumption about the likely density of development that may be achieved on a site.

Estimating Lead-in-times and Completions

- 2.54 If a site has been considered to be 'Suitable, Available and Achievable' or 'Suitable, Likely to become Available and Achievable' then an assessment has been made as to when the potential of that site will be realised.
- 2.55 To ensure that the SHLAA assessments are accurate, and the resultant findings are robust, the Council invited stakeholders, developers, and landowners to comment up on assumptions relating to lead-in times and build rates as part of the stakeholder event in August 2014; July 2015 and again as part of the Council's Local Plan Review - Preferred Development Option (PDO) consultation in July/August 2017; the PSVLP consultation in April/May/June 2019 and the Updated PSVLP consultation in October/November 2021. Where developers and landowners have provided specific information relating to these matters and other influences such as phasing, this has been used to inform the development forecast for those sites.

Lead-in-time Assumptions

- 2.56 The assumptions relating to lead in times (to first completions) from the granting of planning permission are set out in Table 2.2 below:

Lead-in-Times				
Status	Sites below 150 dwellings	Sites over 150 dwellings	Apartments <50	Apartments >50
Under construction	n/a	n/a	n/a	n/a
Full Permission/R Matters	1.5 years	1.5 years	2 years	3 years
Outline Permission	2 years	3 years	No data	No data
Sites without Permission	2.5 years	4 years	No data	No data

Table 2.2: Lead in Time assumptions

- 2.57 These assumptions were identified, and sensitivity tested through the sample analysis of individual applications from major and local developers set out in Appendix 5. Although variations in lead-in times for sites of all sizes are evident, a specific trend was identified that the period of time to completion of the first dwelling is notably longer for sites in excess of 150 dwellings but only in circumstances where outline permission has been granted or permission has yet to be granted. This is reflected accordingly in the Council's approach to lead in times.
- 2.58 The information in Appendix 5 is updated annually with recent permissions/completions and the assumptions re-assessed. Of the 21 sites with a capacity of over 150 dwellings that were analysed, 14 completed their first dwelling within the lead-in times specified in Table 2.2 above. A further 4 completed the first dwelling just over (ie. within 6 months) the lead-in times specified in Table 2.2. Whilst

only 2 sites lead-in times to the completion of the first dwelling was significantly more than the assumptions in Table 2.2. One site (3611b) has commenced development but has not yet recorded any completions. Therefore, in terms of sites with a capacity of over 150 dwellings it is considered that the assumptions are still robust and do not need to be altered.

- 2.59 Of the 39 sites with a capacity of less than 150 dwellings that were analysed, 28 completed their first dwelling within the lead-in times specified in Table 2.2 above. A further 3 completed the first dwelling just over (ie. within 6 months) the lead-in times specified in Table 2.2. Whilst only 6 sites lead-in times to the completion of the first dwelling was significantly more than the assumptions in Table 2.2. Two sites (1509 and 3907) have commenced development but have not yet recorded any completions. Therefore, in terms of sites with a capacity of less than 150 dwellings it is considered that the assumptions are also still robust and do not need to be altered.
- 2.60 The recent trend of apartment schemes was assessed last year for the first time. Whilst the sample size was relatively small there was evidence of differing lead-in times for larger scale schemes with planning permission. Those schemes with full/reserved matters planning permission over 50 units tended to have a lead-in time to completion of around 3 years. Whilst those schemes with full/reserved matters planning permission less than 50 units tended to have a lead-in time to completion of around 2 years. As apartment schemes, are generally completed as a single entity and are not phased there is no distinction between the first completion and the completion of the whole scheme. There has only been one further scheme (1703) completed since last year (albeit that there are three further schemes of less than 50 units under construction), hence there is no more significant data available to assess, and therefore no change to the lead in times for apartment schemes has been made.

Build Rate Assumptions

- 2.61 Where there has been an absence of up-to-date information provided directly from landowners/developers' annual build rates informed by the Council's local evidence (see Appendix 6) has been utilised as set out in Table 2.3 below:

Build Rates			
Site Size	Less than 50 dwellings	50 to 150 dwellings	More than 150 dwellings
Build Rate (units per year)	20	35	55

Table 2.3: Build Rate assumptions for different site thresholds.

- 2.62 These build rate assumptions are adapted from analysis of average build rates per year and overall, between 2003/04 and 2023/24 (see Appendix 6). Long term analysis of delivery is considered reasonable to inform the assumptions given the changes in economic conditions experienced, significant variation in site circumstances and the annual differences in sample sizes within each category. In undertaking the analysis on sites of less than 50 dwellings, to prevent the average build rate being suppressed through delivery of small individual site capacities in less than a year, all sites with a

capacity of below 20 dwellings were removed. The average build rate for the last 10 years has also been assessed to capture any fluctuations in the long-term trend. Each of the build rate categories applied in the SHLAA remain consistent with both the respective ten-year and the longer-term averages.

Stage 3: Windfall Assessment and “Small Sites” Allowance

- 2.63 The NPPF¹⁸ permits local planning authorities to make an allowance for windfall sites within the five-year supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. There is no published guidance on how such an allowance should be calculated, therefore, it is up to individual local planning authorities’ discretion as to how it should be calculated.
- 2.64 In addition, the Planning Practice Guidance indicates that local planning authorities could include a windfall allowance (using the same criteria as set out in paragraph 67 of the National Planning Policy Framework) for years 6-15 of the supply¹⁹.
- 2.65 The NPPF defines windfall sites as those “which have not been specifically identified as available in the development plan”. They normally comprise previously developed sites that have unexpectedly become available.
- 2.66 Previous iterations of the SHLAA prior to 2017 did not utilise a physical size or capacity threshold for the identification of sites, as is now required by Planning Practice Guidance. Since 2017 a revised approach has been applied to bring the SHLAA up to date with current practice. To this end, a physical site size threshold of 0.25ha has been adopted (see paragraphs 2.10 to 2.11 for justification) and only sites that meet this threshold have been assessed. For sites below this size, an allowance is made for the delivery of small sites within the housing land supply, based on historic completion information. Historic completion rates for sites below the threshold of 0.25ha are depicted in Table 2.4 below:

Year	Total number of completions	Completions on Small Sites (below 0.25ha)	Completions on Small sites as a % of total completions	Completions on Large Windfall Sites (0.25Ha and above) not previously in SHLAA
2007/2008	1566	111	7.1%	1
2008/2009	632	73	11.6%	0
2009/2010	387	57	14.7%	0
2010/2011	526	42	8.0%	0
2011/2012	600	57	9.5%	3

¹⁸ Paragraph 72 of the NPPF (MHCLG, December 2023)

¹⁹ The Planning Practice Guidance (MHCLG), Housing and economic land availability assessment Paragraph: 23, Ref ID: 3-023-20190722.

Year	Total number of completions	Completions on Small Sites (below 0.25ha)	Completions on Small sites as a % of total completions	Completions on Large Windfall Sites (0.25Ha and above) not previously in SHLAA
2012/2013	647	58	9.0%	0
2013/2014	693	116	16.7%	2
2014/2015	687	55	8.0%	0
2015/2016	594	76	12.8%	0
2016/2017	513	108	21.1%	0
2017/2018	359	114	31.8%	7
2018/2019	503	82	16.3%	0
2019/2020	541	114	21.1%	3
2020/2021	571	131	22.9%	0
2021/2022	694	121	17.4%	0
2022/2023	1472	52	3.5%	3
2023/2024	654	89	13.6%	0
10 Yr Total	6,590	942	14.3%	13
Small sites average completions (last 10 yrs)		94		

Table 2.4: Summary of annual average small sites completions (Net figures)

- 2.67 The above data shows that Warrington has a strong record of delivering a substantial number of dwellings on small sites. This delivery has taken place under varying economic conditions and hence, does not follow any particular trend. At the examination into the Warrington Local Plan 2021/22-2038/39 the Inspector’s concluded, after evidence provided by the Council that it was reasonable to include this small site allowance in the forward supply with some additional allowance for small high density sites under 0.25ha but with more than 5 units²⁰, and set the Small Sites Allowance at **100 units per annum for the full Plan Period**. The number of completions from small sites together with the average figure for the latest ten-year period will continue to be monitored to ensure that the Local Plan assumptions remain valid.
- 2.68 Additional consideration has been given to applying a windfall allowance for ‘large sites’ above the threshold of 0.25ha. However, data for the past ten years has revealed that only a small number of dwellings (13) in three different years were delivered on sites above 0.25ha in size that were not previously identified within a SHLAA or as an allocation. For this reason, a separate windfall allowance for ‘large sites’ of 0.25ha or above has not been included within this SHLAA.
- 2.69 The employment of a ‘large sites’ windfall allowance, will also continue to be monitored to ensure that any changes in the delivery of such sites is captured.

²⁰ Inspectors Post Hearing letter to the Council dated 16th Dec 2022, paragraph 47 ([Inspectors Document ID06](#)).

Stage 4: Assessment Review

- 2.70 The purpose of Stage 4 of the SHLAA process is to set out how much housing can be provided and at what point in the future. Stage 4 of the study is presented in the next section of this report, providing a summary of the findings, including the identification of the Borough's 'deliverable' and 'developable housing land supply along with an assessment of the associated risks and the local delivery record.

Stage 5: Final Evidence Base

- 2.71 This report produces a set of standard outputs in line with the Planning Practice Guidance²¹, as detailed previously in paragraph 2.1.
- 2.72 The conclusions and core outputs are contained in the following sections and the appendices.

²¹ The Planning Practice Guidance (MHCLG), Housing and economic land availability assessment Paragraph: 026 Reference ID: 3-026-20190722

3 Assessment Review

- 3.1 This section of the report presents the overall findings from the 2024 SHLAA, including the identification of the Borough's 'deliverable' and 'developable' housing land supply. The site-specific details for each "large" site are available in the individual site proformas in Appendix 1 to support these assessment conclusions. In reaching these conclusions, the Council has considered information provided by stakeholders and planning histories of sites, including the presence of previously unimplemented permissions.

Number and Nature of Sites Identified

- 3.2 A total of 647 sites, were identified and included within the initial SHLAA assessment process. Of these 306 sites have been removed from the assessment process due to being small sites of less than 0.25ha, leaving a total of 341 large sites, covering approximately **3,128** Hectares. Of those large sites, 331 (97%) were rolled forward from the 2023 SHLAA and hence 10 sites are wholly new sites.
- 3.3 Of the 341 large sites identified, 115 (34%) of them constituted previously developed land (PDL), 205 (60%) were on greenfield land (GF) and 21 (6%) were considered to be part previously developed/part greenfield.
- 3.4 In terms of achievability, of the 130 sites considered to be suitable and available (or likely to become available), 61 (21%) sites were in possession of a planning approval on 1st April 2024. Out of these sites in possession of planning approval, a total of 26 sites have been implemented. 12 of which have now been completed and 14 are still currently under construction.

Large Sites Discounted from Housing Land Supply as Constrained

- 3.5 Out of the 341 large sites identified, 130 (38%) were considered to be 'suitable' whereas 211 sites (62%) were regarded as unsuitable and are therefore classified as constrained (Appendix 2). The main reason for sites being discounted as constrained was because there is some form of policy constraint. Principally this was because sites were located within the Green Belt but also included restrictions due to being employment land, open space, or community facilities. Other reasons included issues such as concerns regarding flood risk; ground contamination; impacts on the historic environment and safeguarded routes for a transport schemes. Five sites were identified as constrained and will be removed from future SHLAA's because they are no longer considered to be available, either due to lack of owner interest; implementation of alternative uses or in one case due to the site now forming part of the SEWUE allocation under Policy MD2 of the recently adopted Local Plan.
- 3.6 Of the 130 large sites considered to be 'suitable', 67 (20%) sites were considered suitable and available (including sites that completed in this monitoring period) (deliverable). Whilst 63 (18%) sites were considered suitable, not currently available but likely to become available (developable). The main reason leading to the

conclusion that sites were likely to become available was where they currently represent obvious infill development opportunities in high demand market areas, the town centre and adjacent to or within regeneration areas. When sites were considered to be not currently available but likely to become available a cautious approach has been taken to forecasting completions with any housing supply necessarily restricted to the developable supply.

Site Type	Large Sites Assessed	Small Sites not Assessed	Total Number of Sites
Deliverable	67	136	203
Developable	63	104	167
Constrained	211	66	277
Total	341	306	647

Table 3.1: Number of Deliverable, Developable and Constrained sites

Other Sites Removed from Housing Land Supply

- 3.7 Housing completions monitoring is now an integral part of the SHLAA process and the findings from the latest round of completions monitoring is presented in the schedule included as Appendix 7. As monitoring reveals that sites have been 'built out' in full i.e. have no remaining capacity, these sites will be removed from the SHLAA.

Identified Deliverable Supply of Housing Land

- 3.8 The NPPF defines deliverable land for housing as a site which is available now, in a suitable location for development and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.
- 3.9 To assess the timescale within which each site is capable of development, the information on suitability, availability, achievability, and any constraints inform the conclusions of whether a site is deliverable and/or developable.
- 3.10 Out of the 341 sites assessed within the SHLAA, only the sites considered to be suitable, available now and achievable are capable of contributing to the Borough's 'deliverable' supply of housing. Judgements in this respect have been informed by evidence which supports the deliverability of sites including the absence of significant constraints, as set out in Appendix 1 for the individual sites. Where possible this included landowner/developer contact to establish lead-in-times to commencement of development and build out rates.
- 3.11 Through identifying those sites likely to deliver dwelling completions within the next five years (2024-2029), the Borough's 'deliverable' supply of housing land, as of 1st April 2024, has been calculated and is summarised in Table 3.2 below.

	No. of Sites	Area (Ha)	Forecast Completions						Total	Total as %
			24/25	25/26	26/27	27/28	28/29			
PDL	29	29.93	540	170	239	174	115	1238	33.4	
GF	21	357.77	17	175	581	738	679	2190	59.0	
PDL/GF	5	10.39	0	18	66	138	58	280	7.6	
Total	55	398.09	557	363	886	1050	852	3708	100%	

Table 3.2: Deliverable supply of housing land (All Sites – excluding small sites allowance)

- 3.12 additional differentiation between those sites with and without planning An permission is provided below in Tables 3.3 and 3.4 for information. Although a site having planning permission is not a pre-requisite of being ‘deliverable’ it does imply a greater certainty that development will take place unless there is clear evidence schemes will not be implemented within five years.

	No. of Sites	Area (Ha)	Forecast Completions						Total	Total as %
			24/25	25/26	26/27	27/28	28/29			
PDL	27	26.33	540	170	184	109	55	1058	51.2	
GF	10	66.09	17	148	283	196	175	819	39.6	
PDL/GF	4	6.88	0	1	31	103	55	190	9.2	
Total	41	99.30	557	319	498	408	285	2067	100%	

Table 3.3: Deliverable supply of housing land (Sites with planning permission)

	No. of Sites	Area (Ha)	Forecast Completions						Total	Total as %
			24/25	25/26	26/27	27/28	28/29			
PDL	2	3.60	0	0	55	65	60	180	11.0	
GF	11	291.68	0	27	298	542	504	1371	83.5	
PDL/GF	1	3.51	0	17	35	35	3	90	5.5	
Total	14	298.79	0	44	388	642	567	1641	100%	

Table 3.4: Deliverable supply of housing land (Sites without planning permission)

- 3.13 The increase in the number of sites without planning permission in the deliverable supply is due to a number of the sites that have been allocated through the recently adopted Local Plan not yet having received planning consent but are still expected to start delivering housing within the next five years. The majority of these sites have had planning applications submitted and resolutions to grant planning permission subject to the S106 Agreements being signed – 3 sites had their S106 signed shortly after the end of this AMR monitoring period - and the signed Statements of Common Ground from the Local Plan Examination confirm that the land owners/developers expect to commence development within the next five years.

Identified Developable Supply of Housing Land

- 3.14 The NPPF defines 'developable' land for housing as a site in a suitable location for housing development with a reasonable prospect that the site is available for and could be viably developed at the point envisaged.

- 3.15 Out of the 341 sites assessed within the SHLAA only those sites concluded as being 'suitable, available and achievable' and 'suitable, likely to become available and achievable' are capable of contributing to the Borough's developable supply of housing.
- 3.16 The NPPF requires local planning authorities to identify specific developable sites or broad locations for years 6-10 and where possible, for years 11-15. Through identifying those sites likely to deliver dwelling completions within the next 6-15 years, the Borough's 'developable' supply of housing land, as at the 1st April 2024, has been calculated in Tables 3.5 and 3.6 below.
- 3.17 Individual site proformas in Appendix 1 provide specific details for each of these sites.

	No. of Sites	Area (Ha)	Forecast Completions						
			29/30	30/31	31/32	32/33	33/34	Total	Total as %
PDL	32	25.87	502	1005	544	636	35	2722	51.8
GF	15	346.22	552	444	471	444	387	2298	43.8
PDL/ GF	4	17.43	30	55	64	55	28	232	4.4
Total	51	389.52	1084	1504	1079	1135	450	5252	100%

Table 3.5: Developable supply of housing land (6-10 year period)

	No. of Sites	Area (Ha)	Forecast Completions						
			34/35	35/36	36/37	37/38	38/39	Total	Total as %
PDL	19	16.69	253	60	229	81	46	669	31.6
GF	4	306.91	360	300	250	260	253	1423	67.1
PDL/ GF	2	5.07	0	25	2	0	0	27	1.3
Total	25	328.67	613	385	481	341	299	2119	100%

Table 3.6: Developable supply of housing land (11-15 year period)

Overall Housing Land Supply (including Small Sites Allowance)

- 3.18 The deliverable (years 0-5) and developable (years 6-15) housing land supply is comprised of large sites (>0.25ha) with planning permission, SHLAA sites that are suitable for housing and an allowance for small sites (<0.25ha).
- 3.19 Sites that have an extant consent but have stalled or where consent has expired have been re-assessed in terms of their suitability for housing and where they still have potential to deliver dwellings have been pushed back from the short-term supply into the longer term 'developable' supply period (6-15 years).
- 3.20 This site sifting exercise and re-assessment of stalled sites means that the large sites with planning permission that are included in the short to mid-term (0-5 years and 6-10 years) outstanding capacity have a high degree of certainty of coming forward. As has the Small Sites Allowance, which is based on historic completions data. This sifting

and re-assessment exercise provides confidence in the data used for the supply position and as a result there is no need to include an additional ‘lapse’ or non-delivery rate.

Housing Land Supply		
Period	Composition of sites	Number of dwellings
Deliverable 0-5 years	Large sites – with planning permission	2067
	Large sites – without planning permission	1641
	Small sites - allowance (100 x 5)	500
	Sub total	4208
Developable 6-10 years	Large sites – with planning permission	742
	Large sites - without planning permission	4510
	Small sites - allowance (100 x 5)	500
	Sub total	5752
Developable 11-15 years	Large sites – with planning permission	247
	Large sites - without planning permission	1872
	Small sites - allowance (100 x 5)	500
	Sub total	2619
Total		12,579

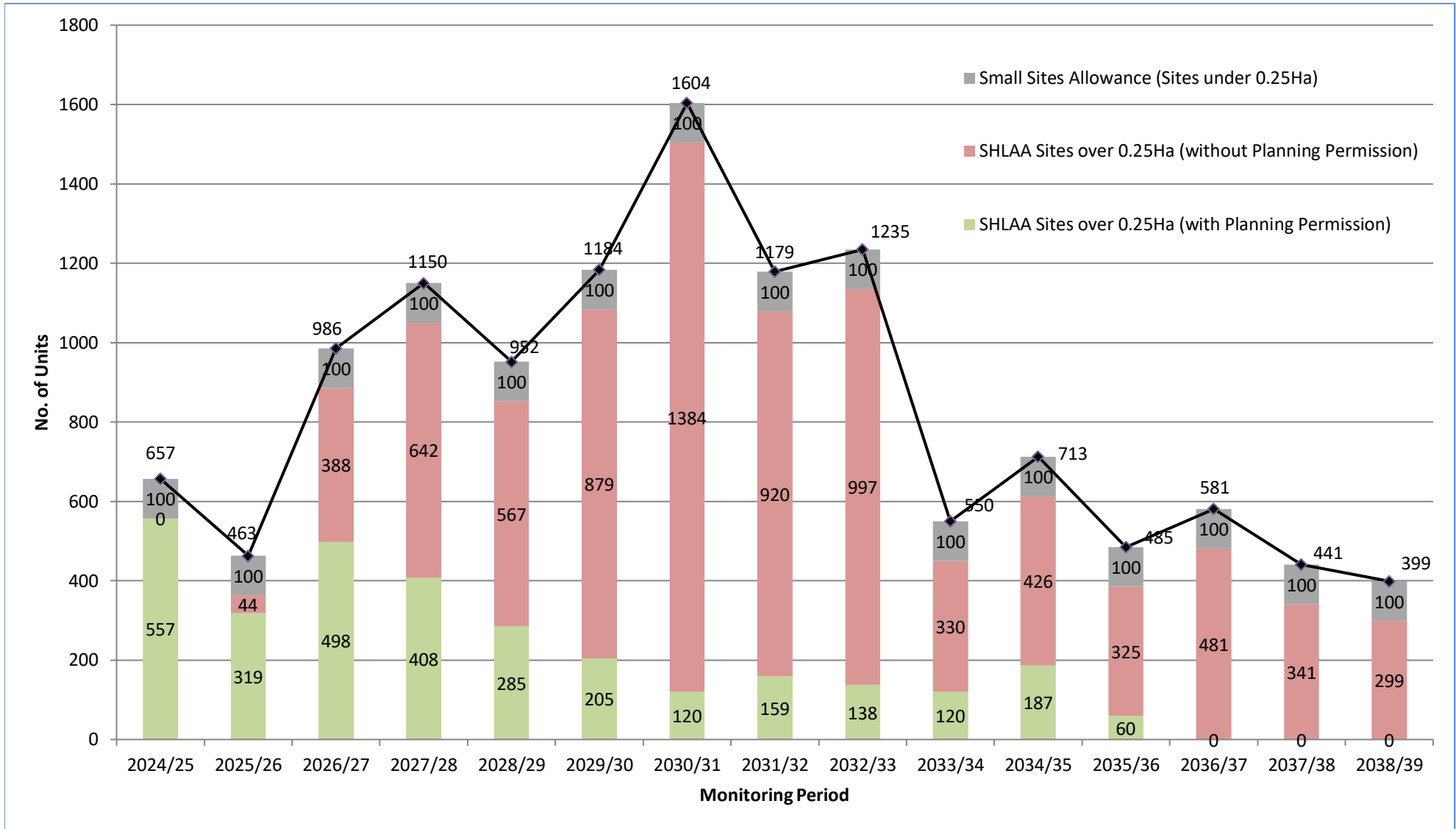
Table 3.7: Deliverable and developable housing land supply over the next 15 years

An Indicative Trajectory

3.21 The information from the previous tables has been used to produce an indicative trajectory of forecast delivery in Figure 1 on the following page. This illustrates on an annual basis how much housing can be provided and at what point in the future. The significant spikes in the trajectory in the middle years (2026/27 and 2032/33) are primarily due to the anticipated delivery of:

- a number of large apartment schemes in the town centre (SHLAA Refs: 1401, 2672a-d and 2673a-b);
- a number of Inner Warrington sites on the edge of the Town Centre (SHLAA Refs: 1752 and 2450);
- the remaining phases of Omega (SHLAA Refs: 3611 and 3611a-b);
- the main development areas (MD2-MD4) allocated through the Local Plan (SHLAA Refs: 3168, 3853 and 1865);
- the settlement sites (OS1-OS6) allocated through the Local Plan (SHLAA Refs: 3155, 3157, 3854, 1528, 3332 and 2670); and
- other large, consented sites at Peel Hall and Grappenhall Heys (SHLAA Refs: 1506 and 1646).

Figure 1: SHLAA 2024 – Indicative Trajectory



Risk Assessment

Review of Past Projections

- 3.22 Whilst, the planning practice guidance (Paragraph: 025 Reference ID: 3-025-20140306) no longer advises that a risk assessment should be made as to whether sites will come forward as anticipated, the Council have decided to continue to undertake an assessment, given the importance of seeking to predict as accurately as possible future rates of delivery. This 2024 report represents the Council's thirteenth comprehensive SHLAA. A review of past projections has been undertaken to establish the degree of confidence of future projections and hence confidence with regards to the latest land supply assessments and trajectories.
- 3.23 The table below illustrates that the accuracy of previous projections is very high. Detailed analysis that compares actual completions with anticipated completions, concludes that actual completions were occurring on the sites where they were expected to.

Year	Projected	Actual	Balance
2009/10	306	388	+82
2010/11	435	527	+92
2011/12	563	600	+17
2012/13	643	647	+4
2013/14	578*	693	+115
2014/15	612*	687	+75
2015/16	458	595	+137
2016/17	366	513**	+147
2017/18	318	359	+41
2018/19	404	503	+99
2019/20	587	541	-46
2020/21	600	573	-27
2021/22	993	694	-299
2022/23	959	1,472	+513
2023/24	921	654	-267

Table 3.8: Review of SHLAA projected/actual (Net) completions.

**Projected figures based on those from 2012/13 SHLAA, as a SHLAA report was not produced in 2013 or 2014 (due to EIP of LPCS and subsequent High Court Challenge).*

***Please note that the Housing completion figures reported in the 2017 SHLAA report were incorrect. This was down to an error with the number of losses recorded.*

- 3.24 The fact that projections have continually been exceeded in all but four years serves to demonstrate the cautious approach within the SHLAA, which is entirely in keeping with the approach requested by stakeholders. In this regard the SHLAA represents the minimum forward land supply which trend information supports is likely to be exceeded. The three years between 2019/20 and 2021/22 and the latest year 2023/34 have been the only times that actual completions have not exceeded those that were projected. This was principally due to a site in Grappenhall Heys not coming forward

when expected in 2019/20 and the impact of the COVID pandemic, which impacted on the rate of delivery of two large apartment schemes in the Town Centre (SHLAA Refs: 1029 and 1746). It is considered that this isolated instance in 2019/20 and the unprecedented events of the pandemic does not undermine the approach taken in calculating the forward supply. Whilst the actual completions in 2022/23 exceeded the projected completions by over 500 units might be seen as suggesting that the assumptions used in projecting the forward supply are inaccurate. However, it is considered that this is merely a reflection of the previous few years under completions feeding through into the supply. The subsequent under delivery in relation to the projected completions in 2023/24 is largely accounted for by the large town centre apartment scheme (SHLAA Ref: 1029) only completing 136 of the 362 apartments in the 2023/24 monitoring period. However, the remainder of the scheme was substantially complete and was just waiting for Building Regulation completion certificates to be issued.

- 3.25 What is more, the projections made for the forward supply have been reviewed and revised where necessary to take account of the impact of the pandemic on the forward supply. In addition, the accuracy of projections will be kept under review to ensure that future assessments continue to provide an accurate prediction of future supply.

Demolitions/Losses

- 3.26 No additional allowance has been made for losses through demolition or conversions. This is because the figures for each SHLAA site's anticipated yield are estimated on a net basis rather than a gross basis within this report. In simple terms, if a single house is demolished to make way for 10 new apartments, then the SHLAA records the estimated yield for the site as being 9 units.

'Small sites' allowance

- 3.27 Paragraphs 2.63 to 2.69 of this report provides evidence to demonstrate that Warrington has a source of 'small sites' that can be considered deliverable on a regular basis. Therefore, a 'small sites' allowance of **100 dwellings per annum** has been included within the housing supply. This figure will continue to be monitored on an ongoing basis to ensure that it still reflects the assumptions used in the Warrington Local Plan 2021/22-2038/39.

Continuity of the forward land supply

- 3.28 The 2024 SHLAA represented the Council's tenth successive SHLAA since the previous plan (LPCS) was adopted and the first since the new Warrington Local Plan 2021/22-2038/39 was adopted on 4th December 2023. As such it has been possible to begin to analyse the continuity of the anticipated forward land supply.
- 3.29 Table 3.9, below, shows that across the first four annual assessments the projected forward land supply was relatively stable. When actual completions have been exceeding projected rates, a reducing residual forward land supply would normally be

experienced. This has not been the case in Warrington up to 2012, where the continuity of the forward land supply can be seen as enduring. This owes to a combination of the forward land supply having been continually topped up by an influx of new sites within each of the annual reviews (windfall), schemes securing planning permission at higher densities than envisaged by the SHLAA and sites previously deemed as being suitable but constrained being unlocked.

SHLAA	Deliverable (0-5 Year)	Developable (6-10 Year)	Developable (11-15 Year)	Total Del/Dev Supply
2009	2377	1639	1428	5444
2010	2073	1577	1704	5354
2011	2501	1308	1238	5047
2012	2765	1558	1562	5885
No SHLAA produced				
2015	3340	3819	2713	9872
2016	3494	3927	2868	10289
2017	2674	4107	2940	9721
2018	3555	3242	2427	9226
2019	3816	2521	2533	8870
2020	3524	4134	2772	10430
2021	3857	4684	2424	10965
2022	3515	4587	2468	10,570
2023	2924	4230	1563	8717
2024	4208	5752	2619	12,579

Table 3.9: Anticipated forward land supply.

- 3.30 Within the figures for 2009 to 2012 there was no reliance upon any of the key strategic proposals (Omega & Lingley Mere/Waterfront & Arpley Meadows) or other sites that were held back (HCA sites) through the emerging Local Plan Core Strategy. However, from 2015 onwards figures are included for these sites following the successful High Court Legal Challenge to the adopted Warrington Local Plan Core Strategy, which subsequently resulted in the housing target being removed from the plan. The figures for these sites were based on planning permissions that had been granted (except for Waterfront/Arpley Meadows). It is important to note that since the inclusion of these sites the projected forward land supply has remained relatively stable.
- 3.31 As expected the forward supply has been bolstered this year now that the new Local Plan (the Warrington Local Plan 2021/22-2038/39) has been adopted and additional homes have come into the supply from the allocation sites, which were previously classified as constrained due to them being located within the Green Belt.

4 Five-year Housing Land Supply Position

Assessing Housing Land Supply relative to Objectively Assessed Needs

- 4.1 Whilst the provisions within paragraph 76 of the current NPPF²² mean that the Council do not need to identify a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing the Council have calculated the 5 year supply position for each of the next five years, based on the data contained in this SHLAA, in the event that the protection provided to LPA's who have a recently adopted Local Plan is removed as is proposed in the recent government consultation²³
- 4.2 The proposed revisions to paragraph 76 of the NPPF require that:

Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or*
- b) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.*

- 4.3 The supply of specific deliverable sites is required to include a buffer (moved forward from later in the plan period) of 20% given there has been a significant under delivery years of homes in the borough over the last three years.

5 Year Housing Land Supply Position

- 4.4 In accordance with proposed revised paragraph 76 of the NPPF the borough's deliverable housing supply has been calculated against the housing requirement set out in Policy DEV1 of the recently adopted Warrington Local Plan 2021/22-2038/39. Based on this, the 5-year supply requirement for 2024/25 and the council's projected five-year supply position for the next five years is set out in table 4.1 below. Currently there has not been a significant under delivery of housing over the previous three-year period and therefore the 5% buffer has been applied. It has been assumed that this would continue.

²² The [National Planning Policy Framework \(DLUHC, Dec 2023\)](#).

²³ [Proposed reforms to the National Planning Policy Framework and other changes to the planning system \(MHCLG, 30th July 2024\)](#).

Projected 5 Year Supply (as of 1st April 2024)					
	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5
5 Year Band	2024/25- 2028/29	2025/26- 2029/30	2026/27- 2030/31	2027/28- 2031/32	2028/29- 2032/33
Housing Requirement Method	2 Years at 678 3 years at 870 +5%	1 Year at 678 4 years at 870 +5%	5 years at 870 +5%	5 years at 870 +5%	5 years at 870 +5%
Housing Requirement	1356 + 2610 + 198	678 + 3480 + 208	4350 + 217	4350 + 217	4350 + 217
	4,164	4,366	4,567	4,567	4,567
Projected Housing Supply	4,208	4,735	5,876	6,096	6,154
No. Years Supply	5.05	5.42	6.44	6.68	6.74

Table 4.1: Anticipated 5 Year Supply for next 5 years.

5 Conclusions

Assessing Housing Land Supply relative to Objectively Assessed Needs

- 5.1 The SHLAA has been a key part of the evidence base for the Local Plan Review. It provides a comprehensive assessment of the borough's housing capacity.
- 5.2 Whilst the Council are not currently required to demonstrate a five-year supply of specific deliverable sites due to having an adopted Plan that is less than five years old, an assessment has been made of the current five-year supply position. Based on the information contained in this SHLAA the council can demonstrate a **5.05** year supply of deliverable housing land, as of **1st April 2024**. This is forecast to increase to a 5.42 year supply in the following year.

Monitoring and Review

- 5.3 The SHLAA will be updated on a regular basis to ensure it remains an effective and up to date evidence base for the future monitoring of housing provision against targets contained within the newly adopted Local Plan. The proposed updates will not alter the methodology, unless the PPG or NPPF is amended in a way that would require a review of the methodology.
- 5.4 However, housing completion monitoring will continue to be undertaken on an annual basis to ensure that the Council have an up-to-date record of housing provision even if a SHLAA Report is not produced every year and to ensure that the Council's Brownfield Land Register can be kept up to date.

NOTE: It should be noted that this SHLAA now includes the supply from sites that have been allocated in the recently adopted Local Plan²⁴. The Council adopted its new Local Plan on 4th December 2023. This Plan allocates several former Green Belt sites for housing development.

²⁴ The [Warrington Local Plan 2021/22-2038/39](#).

Definition of Terms

Annual Monitoring Report (AMR): An annual report submitted to the Government by the Local Planning Authority assessing the progress with and the effectiveness of the Local Planning Framework.

Local Plan Core Strategy (LPCS): The current adopted plan. The document at the heart of the Local Plan that sets out the long-term spatial vision for the local planning authority area, the spatial objectives and strategic policies to deliver that vision.

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

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five year (Definition taken from the NPPF).

Developable land: To be considered developable, sites should be in a suitable location for housing development, and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. (Definition taken from the NPPF).

Development Plan: Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.

Flood Risk: An expression of the combination of the flood probability or likelihood and the magnitude of the potential consequences of the flood event.

Flood Risk Assessment: A study to assess the risk to an area or site from flooding, now and in the future, and to assess the impact that any changes or development on the site or area will have on flood risk to the site and elsewhere. It may also identify, particularly at more local levels, how to manage those changes to ensure that flood risk is not increased. NPPF technical guidance differentiates between regional, sub-regional/strategic and site-specific flood risk assessments.

Green Belt: A designation for land around certain cities and large built-up areas, which aims to keep this land permanently open or largely undeveloped. The purpose of the Green Belt is to;

- check the unrestricted sprawl of large built up areas;
- prevent neighbouring towns from merging into one another;
- safeguard the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- assist urban regeneration by encouraging the recycling of derelict and other urban land.

The boundaries of the Green Belt in Warrington, which is contiguous with the Green Belt in Merseyside, Greater Manchester, and North Cheshire, are shown on the Local Plan Core Strategy Proposals Map.

Greenfield: Land on which no development has previously taken place unless the previous development was for agriculture or forestry purposes or, the remains of any structure or activity have since blended into the landscape.

Local Development Scheme (LDS): The local planning authority's programme for the preparation of Local Development Documents that must be agreed with Government and reviewed every year.

Local Plan: A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

National Planning Policy Framework (NPPF): The NPPF came into effect in March 2012 and sets out the Government's requirements for the planning system in the form of a statement of national policy which aims to achieve sustainable development through the preparation of local plans and the management of development proposals by local planning authorities. The NPPF replaces all previously published Planning Policy Guidance notes (PPGs) and Planning Policy Statements (PPSs) except for PPS10 (Sustainable Waste Management) which is still relevant until replaced in due course by a National Waste Plan.

Open Space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes, and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Previously Developed Land (PDL): Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure

or fixed surface structure have blended into the landscape in the process of time (definition taken from the NPPF).

Statement of Community Involvement (SCI): sets out the standards to be achieved by the local authority in involving local communities in the preparation, alteration and continual review of Local Development Documents and development control decisions.

Strategic Flood Risk Assessment (SFRA): Part of the Local Planning Framework evidence base. A detailed and robust assessment of the extent and nature of the risk of flooding in an area and its implications for land use planning. Can set the criteria for the submission of planning applications in the future and for guiding subsequent development control decisions.

Strategic Housing Land Availability Assessment (SHLAA): Part of the Local Planning Framework evidence base. The document looks to identify sites with potential for housing, assess their potential and assess whether they are likely to be developed in order to identify a five, ten and fifteen year supply of housing for an area.

Local Housing Need Assessment (LHNA): Part of the Local Planning Framework evidence base. The document estimates need and demand for affordable and market housing and assesses how this varies across the study area. The document also considers future demographic trends and resulting housing requirements.

Unitary Development Plan (UDP): An old-style development plan prepared by a Metropolitan District and some Unitary Local Authorities. These plans will continue to operate for a time after the commencement of the new development plan system introduced by the Planning and Compulsory Purchase Act 2004, by virtue of specific transitional provisions.

Appendices

Appendix 1 - Site Proformas

Appendix 2 - Constrained Sites List

Appendix 3 - Density and Net Developable Area Testing

Appendix 4 - High Density Development Justification

Appendix 5 - Sample Site Lead-In Times

Appendix 6 - Build Rates Analysis

Appendix 7 - Housing Completions 2023-2024



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