

Local Plan,
Planning Policy and Programmes,
Growth Directorate,
Warrington Borough Council,
East annexe,
Town Hall,
Sankey Street,
Warrington
WA1 1HU

SENT BY EMAIL
localplan@warrington.gov.uk
12/11/2021

Dear Planning Policy Team,

WARRINGTON LOCAL PLAN: PROPOSED SUBMISSION VERSION

1. Thank you for consulting with the Home Builders Federation (HBF) on the Update Proposed Submission Version of the Warrington Local Plan 2021-2038.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. We would like to submit the following comments upon selected policies within the consultation document. These responses are provided in order to assist Warrington Borough Council in the preparation of the emerging local plan. The HBF is keen to ensure that the Council produces a sound local plan which provides for the housing needs of the area.

Policy DEV1: Housing Delivery

Policy DEV1 is not considered to be sound as it is not positively prepared, justified or consistent with national policy for the following reasons:

Housing Requirement

4. This policy states that over the period 2021 to 2038 a minimum of 14,688 new homes will be delivered, this equates to an average of 816 dwellings per annum (dpa).
5. The PPG¹ sets out that there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the standard method indicates. These include growth strategies for the area, strategic infrastructure improvements, meeting an unmet need from neighbouring authorities and where previous levels of delivery or previous assessments of need are significantly greater than the outcome of the standard

¹ PPG ID: 2a-010-20201216



method. The HBF recommends that the Council investigate these circumstances and consider if a further increase in the proposed housing requirement is required. For example, the Cheshire and Warrington LEP'S Building a Better Future Together: Supporting Recovery in Cheshire and Warrington 2021/22² document highlights investment in strategic infrastructure and priority housing, including exploiting opportunities offered by HS2 and Northern Powerhouse Rail. The document goes on to highlight housing is an important part of sustainable growth – getting the right houses built in the right locations to attract and retain the talent their economy needs.

6. The HBF considers it is important that the proposed housing requirement is viewed as a minimum and barriers are not put in place which may hinder greater levels of sustainable growth. It is considered that the plan could facilitate higher levels of growth by providing greater flexibility. The HBF considers that Warrington is ideally located to achieve high levels of growth, providing it is based upon an appropriate development strategy.

Housing Distribution

7. Part 2 of the policy considers the distribution of housing, it suggests that the majority of new homes will be delivered within the existing main urban area of Warrington, existing inset settlements and other sites identified in the Strategic Housing Land Availability Assessment (SHLAA). The HBF considers that further flexibility could be provided by the wording of this policy, as at present it reads as a statement rather than a policy.
8. The HBF considers that it is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas.

Housing Density

9. This part of the policy provides the densities at which development will be expected to occur, it suggests a minimum density of at least 130 dwellings per hectare (dph) on sites within the defined town centre, at least 50dph on sites within the wider town centre and adjacent to a district centre or in other locations well served by frequent bus or train services and at least 30dph on other sites within an existing urban area. The policy also suggests that densities of less than 30dph will only be appropriate where they are necessary to achieve a clear planning objective, such as to avoid harm to the character or appearance of an area.
10. The HBF generally supports the Council in setting a density policy and making efficient use of land in accordance with NPPF³. However, the HBF considers that it is important to ensure that the prioritisation of higher density development and the use of PDL does not compromise the delivery of homes in sustainable locations to meet local needs. The Council will need to ensure that consideration is given to the full range of policy requirements as well as the density of development, this will include the provision of M4(2) and M4(3) standards, the NDSS, the provision of cycle and bin storage, the mix of homes provided, the availability of EV Charging and parking, any implications of design coding and the provision of tree-lined streets, highways requirements, and the potential

² https://cheshireandwarrington.com/media/dindrzoq/cwlep-supportingrecovery_is01.pdf

³ Paragraph 124 & 125 NPPF 2021

requirements in relation to Biodiversity Net Gain, changes to the Building Regulations requirements in relation to heating and energy and the Future Homes Standard.

11. The HBF is concerned that the use of higher densities has implications for the type, size and tenure of the homes provided and may mean that the Council is not always able to provide an appropriate housing mix across the Council area. This may mean that the homes delivered do not meet the housing needs of the local community or the market demand in the area. The HBF also considers it will be important to consider the future deliverability of intensely developed residential schemes, which will be dependent on the viability of PDL and demand for high density urban living post Covid-19.
12. The HBF recommends that the Council increases the flexibility of the policy to ensure that the density policies are realistic, achievable and will ensure the delivery of homes that area appropriate to market. This could be done through amendments to allow developers to take account of the evidence in relation to market aspirations, deliverability and viability as well as planning objectives in relation to any of the density requirements.

Stepped Housing Requirement

13. This policy suggests that the housing requirement will be stepped in to deliver 678dpa in the period 2021 to 2025 and then 870 dpa in the period 2026 to 2038.
14. The HBF does not consider that this stepped approach is appropriate it appears this stepped housing requirement is intended to reduce the backlog in housing supply at the start of the plan and is being used by the Council as a way of achieving a five-year land supply position on adoption. It is important to remember that this is not just a theoretical mathematical numbers exercise but represents actual households in housing need today, so it is unreasonable and unequitable to expect them to wait until later in the plan period before their current housing needs are addressed. The HBF does not consider the stepped trajectory to be justified and would recommend that further sites should be allocated for delivery in the first five years of the plan.

Policy DEV2: Meeting Housing Needs

Policy DEV2 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

Affordable Housing

15. This policy looks for developments of 10 dwellings or more to provide 20% affordable housing within Inner Warrington, inclusive of the town centre and 30% elsewhere in the Borough. The policy suggests a tenure split of 50:50 within Inner Warrington and for one third of the affordable homes provided elsewhere to be affordable home ownership and two thirds being for affordable housing for rent.
16. Part 6 of this policy then goes on to states that at least 25% of affordable housing units delivered by developers through planning obligations should be First Homes, and that these First Homes must be discounted by a minimum of 30% against market value and that this will be increased to a 40% discount south of the Manchester Ship Canal having regard to the nationally set cap of £250,000.

17. The HBF does not dispute the need for affordable housing within Warrington and indeed supports the need to address the affordable housing requirements of the borough. The Local Housing Need 2021 report identifies a need for 433 affordable homes per annum in Warrington, this is an increase from the previous 377 affordable homes per annum identified in the previous assessment. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability.
18. The Local Plan Viability Assessment (August 2021) highlights issues with affordability for some of the typologies and site allocations. Therefore, the HBF have concerns that this policy will lead to the non-delivery of homes in the Borough. It should be noted that the NPPF⁴ establishes the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.

House Type and Tenure

19. This policy states that residential development should provide a mix of different housing sizes and types and should be informed by the Borough-wide housing mix monitoring target [set out in table 3], the sub-area assessment contained in the most up to date local housing needs assessment and any local target set by a Neighbourhood Plan.
20. The HBF understands the need for a mix of dwelling types and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence.
21. The HBF has concerns that Table 3 provides a snapshot in time and may be superseded by more up to date and other sources of information. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location. The HBF considers that the Council should also consider additional information which might inform the housing mix, including information provided by the home building industry and registered providers.

Space Standards

22. Part 13 of the policy states that the Council will seek to provide dwellings that are appropriately sized and arranged to create well designed homes in accordance with the Nationally Described Space Standards (NDSS).
23. The NDSS as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.

⁴ Paragraph 34 of NPPF 2021

24. PPG⁵ identifies the type of evidence required to introduce such a policy. It states that 'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:
- **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
 - **Viability** – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
 - **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.
25. The Council will need robust justifiable evidence to introduce the NDSS, based on the criteria set out above. The HBF does not consider that the Council can provide the evidence to support the need for this optional standard as part of the policy and as such it should be deleted. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.

Optional Standards

26. This part of the policy states that the Council will seek that as a minimum all homes should be provided at M4(2) standard. It goes on to state that the Council will seek 10% of new housing at M4(3) standards.
27. The HBF is generally supportive of providing homes for older and disabled persons. However, if the Council wishes to adopt the higher optional standards for accessible & adaptable homes the Council should only do so by applying the criteria set out in the PPG. PPG⁶ identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.
28. The Local Housing Needs Assessment provides the Council's evidence for this policy. Unfortunately, this evidence is severely lacking on the majority of these elements. This lack of evidence does question how the percentages identified in the policy were derived. It is incumbent on the Council to provide a local assessment evidencing the specific case for Warrington which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. Based on the currently available evidence the HBF recommends that this part of the policy is deleted.

⁵ ID: 56-020-20150327

⁶ ID: 56-007-20150327

29. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that the policy should:
- take into account site specific factors such as vulnerability to flooding, site topography and other circumstances which may make the site less suitable for M4(2) and M4(3) compliant dwellings as set out in PPG;
 - ensure that if step-free access is not viable that M4(2) and M4(3) should not be applied; and
 - ensure an appropriate transitional period is included.

Housing for Older People

30. This section of the policy looks for residential developments of 10 or more dwellings to provide housing for older people.
31. Whilst the flexibility of the policy is appreciated in terms of the consideration of the location of site, the nature of the area and the type of development. It is not clear what will be required from the development.

Self and Custom Build

32. This section of the policy states that the Council will ensure a sufficient supply of plots for self-build and custom-build housing to meet the identified need on the Council's register.
33. The HBF is concerned that from the policy it is not clear how the Council will ensure a sufficient supply of plots are provided for self-build and custom build housing.
34. There are requirements for custom and self-build plots however set out within the individual site allocations requirements. The HBF considers that the provision of a certain percentage self-build plots on schemes above a certain size adds to the complexity and logistics of development and may lead to the slower delivery of homes. The provision of self-build plots on new housing developments cannot be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site, from both a practical and health & safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity.
35. Alternative policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across the Borough including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.

Policy ENV7 - Renewable and Low Carbon Energy Development

Policy ENV7 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

36. This policy states that major development in all locations outside of the strategic allocations will be required to meet at least 10% of their energy needs from renewable

and / or other low carbon energy sources or to reduce their carbon emissions by at least 10% when measured against Building Regulation (Part L) requirements. Strategic allocations should seek to reduce carbon emissions and maximise opportunities for the use of decentralised energy systems.

37. The HBF considers that tackling climate change by promoting greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable, is the most appropriate way forward. The Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.
38. On 27 July 2021, the Future Homes Delivery Plan⁷ was published (click for the link to [The Future Homes Delivery Plan – Summary of the goals, the shared roadmap & the Future Homes Delivery Hub](#)). To drive and oversee the plan, the new delivery Hub will be launched in September, with the support and involvement of Government. The Hub will help facilitate a sector-wide approach to identify the metrics, more detailed targets where necessary, methods and innovations to meet the goals and the collaborations required with supply chains and other sectors. It will incorporate the needs of all parties including the public and private sector and crucially, consumers, such that they can all play their part in delivering environmentally conscious homes that people want to live in.
39. The HBF considers that the Councils should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council should not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and the Future Homes Standard 2025.
40. The HBF does not consider it is necessary to make more connections to the heat network. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.

⁷ <https://www.futurehomes.org.uk/delivery-plan>

41. Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies.

Site Allocations

42. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and provide a range of development opportunities. The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.
43. The Plan should ensure the availability of a sufficient supply of deliverable and developable land to deliver the Council's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (5YHLS), and achieve Housing Delivery Test (HDT) performance measurements.
44. When selecting housing sites for allocation the Council should select the widest possible range of sites by both size and market locations to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. The Council should also provide maximum flexibility within its overall housing land supply to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum and to provide choice and competition in the land market.

Policy M1 - Local Plan Monitoring and Review

Policy M1 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

45. This policy highlights the measures the Council will undertake if the delivery of housing including affordable housing falls below 100% of the annual requirement. It goes on to state that where total delivery of housing is less than 75% of the annual requirement for three consecutive monitoring years, this will trigger the need for the consideration of a review or partial review of the Local Plan.
46. The HBF supports the Council in including a policy highlighting the actions to be taken if housing is not delivered. However, it is considered that the Council may also want to consider alternate measures such as the granting of planning permission for unallocated sites in sustainable locations. The Council may also want to consider how this policy sits

with the Housing Delivery Test and the presumption in favour of sustainable development as set out in the NPPF.

47. Appendix 2 sets out the Monitoring Framework, the HBF supports the use of appropriate targets however, we would also recommend that specific monitoring triggers are introduced to this framework, along with time-bound actions. In the case of the housing targets this is likely to be similar to Policy M1. This will help to ensure that action will be taken when a target is not met, and a policy needs reviewing.

Future Engagement

48. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

49. Please note that the HBF wishes to participate at the oral examination in order to appropriately represent the home building industry and to address any issues raised at the examination.

50. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



Joanne Harding
Planning Manager – Local Plan (North)

Email: joanne.harding@hbf.co.uk

Phone: 07972 774 229