

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

SENT BY EMAIL
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24/04/2023

Dear Planning Policy Team,

WARRINGTON LOCAL PLAN: MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Warrington Local Plan Main Modifications.
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.

MM03: DEV1

3. The Council propose to amend Policy DEV1 to clarify the plan period, however, it does not propose to amend the housing requirement of 14,688 new homes which equates to 816 dwellings per annum (dpa).
4. The HBF continues to consider that this housing requirement is not sound and should be increased. 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, as the HBF considers is the case in Warrington. 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 method, this is not a limited list. It is also noted that the PPG² states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes, the LHNAU (2021) identifies an affordable housing need of 423dpa.
5. The Council propose to modify the housing density requirements to provide clarity that 30dph will apply on all other sites across the Borough. The HBF considers that this amendment is appropriate and should improve the clarity of this policy. However, the Council does not propose to amend the other density requirements within the Policy.

¹ PPG ID: 2a-010-20201216

² ID: 2a-024-20190220



6. The Council proposes to amend part 6 of the policy to state that *'densities less than those specified in part 5 above will only be appropriate where they are necessary to achieve a clear planning objective'*. The HBF continues to consider that the other density requirements may not always be appropriate and considers that more flexibility in this policy is appropriate.

MM04: DEV2

7. Part 16 and 17 of this policy are proposed to be modified to state that *'the Council will seek that 10% of new housing meets Building Regulation requirement M4(3) 'Wheelchair user dwellings' i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users on sites over 0.5ha of a hectare or of 10 dwellings or more'*. It goes on to state that *'in cases where the above requirements are genuinely not viable or technically feasible, the Council will expect to see evidence of this before any lower level of provision is permitted'*. The HBF continues to consider that this policy is not sound as it is not justified, and the Council's evidence that the M4(3) is required for 10% is not considered to be sufficient. However, if this policy is to be maintained that HBF considers the amendments to parts 16 and 17 do provide further clarity and are generally appropriate.
8. The Council propose to delete part 18 of the policy which looked for older persons housing to be provided in residential developments of 10 or more dwellings. The HBF considers that this deletion is appropriate.

MM05: DEV4

9. The Council propose to modify this policy to state that *'over the 18 year plan period from 2021/22 to 2038/39 provision will be made to meet the need for 168 hectares of employment land to support both local and wider and strategic employment needs'*. This is a significant decrease from the 316.26ha previously proposed. The proposed new paragraph 4.2.13 states that *'in determining the amount of employment land needed for the Plan period an exercise was undertaken to broadly align jobs growth with the planned level of housing provision'*. It goes on to state that *'the delivery of 816 new homes per annum could support an additional 18,300 jobs in the Borough. Using the 18,300 figure and the 142 jobs per hectare figure gives an employment land figure of 129ha over the Plan period'*.
10. The HBF does not consider that this proposed modification is sound, whilst it is understood that the Council is looking to balance the housing and employment provision, it does not seem appropriate to stifle employment development and growth in order to do this. The HBF considers that a more appropriate approach would have been for the Council to increase the housing requirement. The HBF considers that this proposed modification is not consistent with the NPPF which states that planning policies should set out a clear economic strategy which positively and proactively encourages sustainable economic growth³ and help to create conditions in which businesses can

³ NPPF 2021 paragraph 82

invest, expand and adapt⁴, whilst also seeking to address potential barriers to investment such as housing⁵.

MM017: ENV7

11. The Council proposes to delete part of this policy, which sought to reduce carbon emissions by at least 10% when measured against the Building Regulations at the time the application is submitted. The HBF considers that this deletion is appropriate.

Future Engagement

12. 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.
13. 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,



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⁴ NPPF 2021 paragraph 81

⁵ NPPF 2021 paragraph 82