



# Hearing Statement on behalf of Wain Homes (North West) Ltd (ID: UPSVLP 2471)

In relation to: Matter 4 – Housing need and the housing  
requirement

Warrington Local Plan Examination

Emery Planning project number: 19-202

Emery Planning



[www.emeryplanning.com](http://www.emeryplanning.com)

Emery Planning



unlocking development opportunities

Project : 19-202  
Site address : Warrington Local Plan  
Client : Wainhomes (North West) Ltd

Date : 22 July 2022  
Author : Wiktoria Sypnicka/John  
Coxon

Approved by : Stephen Harris

#### Important notes:

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

No part of this document may be reproduced without the prior written approval of Emery Planning.

Emery Planning Partnership Limited trading as Emery Planning.

# Contents:

1. Introduction	1
2. Wain Homes (NW) Ltd response to the Inspector's questions	1

## 1. Introduction

1.1 Emery Planning is instructed by Wain Homes (North West) Ltd (hereafter referred to as “Wain Homes”) to submit a written response to the Inspector’s Matters, Issues and Questions in relation to Matter 4 – Housing need and the housing requirement of the Warrington Local Plan Examination. Wain Homes has an interest in the following omission sites:

- Land at Lumber Lane, Burtonwood; and,
- Land at Runcorn Road, Moore - part of the former draft allocation: Warrington South West urban extension.

1.2 This hearing statement should be read in conjunction with our detailed representations to the Regulation 19 Pre-Submission Draft of the Warrington Local Plan, and our other Hearing Statements submitted to this examination.

## 2. Wain Homes response to the Inspector’s questions

### Questions 1-7

2.1 Wain Homes made Regulation 19 representations as part of the Lichfields’ consortium of developers and housebuilders and intend to rely on those representations in relation to these questions.

### **Question 8 - What is the basis for the stepped housing requirement (678 homes per annum rising to 870 per annum from 2026)? Why were the particular time periods and annual averages chosen? Is the approach justified?**

2.2 The proposed housing requirement for years 1-5 would not be sufficient to meet the housing need calculated using the standard method (816 dpa). There is no evidence to suggest that this need will decrease in the years to come, and in fact, the housing need levels are currently at their highest due to the Council’s persistent failure to meet housing needs in the past, including affordable housing need.

2.3 Paragraph 60 of the Framework states:

*“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come*

*forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*

- 2.4 The Council's approach to the housing requirement is therefore not in accordance with national policy, as it is not supporting the objective of significantly boosting the supply of homes. As set out in the Government's previous White Papers and echoed in the proposed Levelling Up and Regeneration Bill, the UK Government is striving to deliver 300,000 new homes per year in England by the mid-2020s. The Government's 2020-21 Housing Supply; net additional dwellings report indicates that the annual housing supply amounted to only 216,490 dwellings, a decrease of 11% on 2019-20. The annual housing delivery across England has never reached 250,000<sup>1</sup>. It is therefore abundantly clear that there is a national housing crisis and boosting the supply of housing now is increasingly important to meeting the objective of the Government.
- 2.5 Furthermore, as a result of the stepped requirement, the Council is essentially increasing the unmet need over the first 5 years of the plan, with no guarantee that the delivery over the remainder of the plan period will be sufficient to offset the shortfall. This approach is inappropriate and goes against the objectives of significantly boosting the supply of housing in England. There is no provision within national policy which supports the stepped requirement. Similarly, there is no evidence to suggest that the housing market is not capable of delivering the growth required to achieve the Government's housing objectives.
- 2.6 The Framework requires Local Authorities to annually update their deliverable supply of housing against the adopted housing requirements in order to provide a sufficient 5-year housing land supply. However, there is no confidence that the higher housing requirement will ever be used to assess the housing land supply, as once the plan becomes 5 years old the requirement will be based on the local housing need in accordance with paragraph 74 and footnote 39 of the Framework.
- 2.7 It will therefore be possible for the Council to revert to the standard method for calculating the housing requirement 5 years following adoption, thus abandoning the higher housing requirement by not carrying out a review or simply determining that the policies do not need updating.

---

<sup>1</sup> Live tables on housing supply: net additional dwellings – Table 118: annual net additional dwellings and components, England and the regions

- 2.8 We would refer to the case of Guildford Borough Council Local Plan: Strategy and Sites. In their report, the Inspector found that “the stepped trajectory delivered housing at a low rate for several years from the date of adoption, thus falling short of addressing the borough’s deteriorating housing affordability and housing needs in the early years of the Plan”. It was further highlighted in the report that this approach “would have deferred a significant proportion of the housing requirement to the later years of the plan. Set against the (then higher) housing requirement, this would not have met the Government’s objective to boost the supply of housing in the shorter term”. The stepped trajectory was ultimately abandoned, and additional sites were allocated in order to boost the early supply of housing.
- 2.9 We would argue that Warrington is in a similar position in terms of deteriorating affordability and unmet housing need which has accumulated over the previous years. In line with the above Inspector’s comments, it is therefore inappropriate to defer meeting this housing need until later in the plan period as it would allow for the need to accumulate further and would not support the Government’s objective of boosting the early supply of housing.
- 2.10 Overall, we do not consider that the stepped housing requirement is appropriate or justified. There is a clear unmet housing need which needs to be addressed early in the plan period and the lack of confidence in the Authority actually applying the higher housing requirement after 5 years is worrying. The presented strategy would not be in accordance with national policy, the Government’s housing objectives and is not appropriate based on the Council’s own evidence. The Council should therefore abandon the stepped housing requirement in order to significantly boost supply in the early years of the plan. In addition, further sites should be allocated to address the objectives and to ensure that the Council has a deliverable supply upon adoption.