



# **MATTER 4 STATEMENT - METACRE**

Housing Need and the Housing Requirement

Statement on behalf of Metacre / Northern Trust – Respondent 2347

JULY 2022

DOCUMENT REFERENCE: 2347/04



## 1 INTRODUCTION

- 1.1 The responses to questions supplement the representations already made. We do not seek to repeat matters but to draw through our position to the questions posed.
- 1.2 It is the objective of Metacre to see the adoption of a sound development plan for Warrington and it is our firm opinion that to do so the Council must reinstate the deleted housing allocation, formerly OS1 Phipps Lane, Burtonwood, which Metacre is landowner and promoter.
- 1.3 Separate responses on behalf of Metacre are submitted to Matters 2 Duty to Cooperate, 3 The Spatial Strategy and 8 Housing Land Supply. These are supplemented by response made by the Consortium of developers, including Metacre, made by Lichfields and Roger Hannah on its behalf.

## 2 RESPONSE TO THE INSPECTORS' QUESTIONS

*Q1. Has the calculation of Local Housing Need (816 homes per annum) been undertaken appropriately using the standard method and correct inputs?*

- 2.1 Yes. We note the Consortium comment that this calculation will now be 828 dpa as of July 2022

*Q2. Should the housing need figure be higher than the minimum Local Housing Need figure of 816 homes per annum? Do any of the circumstances set out in paragraph 10 of the housing and economic needs assessment chapter of the PPG (or any other relevant circumstances) apply in Warrington?*

- 2.2 Yes. We refer to the evidence provided by Lichfields in this question and its related statements
- 2.3 We would also wish to comment on GL Hearn's 'Developer Rebuttal' claim that housing delivery in the period 2003-2007 is somehow abnormal.
- 2.4 The Council's Housing Trajectory (UPSVLP Appendix 1) proposes net annual delivery of homes over 9 consecutive delivery years 2025/26 to 2033/34, at an average of 1,205 dpa. This figure is remarkably close to the shorter 6 year average of 1,207 dpa for the period



2004/05 to 2008/09 which GL Hearn characterises as period of relatively benign economic conditions and abnormal housing delivery.

- 2.5 Averages can be taken from various periods as Table 2 in its rebuttal demonstrates, but GL Hearn hasn't squared in its rebuttal how it can announce that such rates pre-2008 recession are an abnormal period of activity in the local housing market, then confidently support the Council's trajectory which includes within it a forecast of a new, longer period of 'benign economic' interregnum. It cannot have it both ways.

*Q3. The Local Housing Needs Assessment Update 2021 concludes that 816 homes per annum will provide an increase in working age population sufficient to support the number of additional jobs likely to be created over the plan period. Are the assumptions and calculations which support this analysis robust and is the conclusion justified?*

- 2.6 No.

- 2.7 We rely upon the analysis in Lichfields statement in response to this question, and past papers.

*Q4. What is the relationship, if any, between the housing need figure of 816 homes per annum and the amount of employment being provided for i.e. approx. 316ba?*

*And*

*Q5. What are the implications of this amount of employment land in terms of jobs growth? Is it possible/reasonable to estimate the number of jobs likely to be created from this amount of employment land using past trends, evidence from recent proposed and permitted schemes in Warrington and the wider region or analysis in the Economic Development Needs Assessment 2021 (noting that it estimates the amount of land needed for projected jobs growth using both Oxford Economics and Cambridge Econometrics models)?*

- 2.8 There is a disconnect between the housing need figure of 816 homes per annum and the amount of employment land provided for in the Local Plan. The number of homes run significantly below the number of jobs created from the quantity of employment land proposed based on past trends of employment land take-up and jobs growth.
- 2.9 We defer to the analysis of job creation and correlation to housing target set out in Lichfields paper and previous statement.



*Q6. Does the scale of employment land provision justify an increase in the housing need figure?*

- 2.10 Yes.
- 2.11 We defer to the analysis of job creation and correlation to housing target set out in Lichfields paper and previous statement.

*Q7. Notwithstanding the above, is the housing requirement of 816 homes per annum justified? Should it be higher or lower than this and if so to what level and on what basis?*

- 2.12 No. It should be higher. The Consortium considers this should be in the order of 1,015 dpa.

*Q8. 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?*

- 2.13 There appears no rationale for the stepped housing requirement in the first 5 years of the plan period. It is a contrivance to fit the identified allocations and combined forecast trajectory from each. Put simply had the Council selected more sites for allocation that are deliverable now and available now, and without significant barriers to development, i.e. site access infrastructure, land contamination, etc. it could have avoided a stepped housing requirement.
- 2.14 Whilst the former allocation OS1 Phipps Lane with a potential capacity of at least 160 homes cannot of itself redress the totality of the under-ambition of the stepped target, it is a site that is available and deliverable now and could be fully completed within the first 5 years of the plan period. Not only would that improve certainty of housing delivery in the first 5 years, but it would also meet the spatial strategy objective toward outlying settlements, and Burtonwood in particular.
- 2.15 We can see no other reason for selecting Years 1-5 for a lowered housing requirement other than it assists the Council in mathematically meeting a 5 year supply at time of adoption as is required to find the plan sound. It is a manipulation seen before in other Examinations and it must be questioned whether this lack of ambition meets the scale of the housing crisis and the imperative to deliver new homes without delay.
- 2.16 Delay is not just a housing statistic, but homes denied to those on waiting lists and in need now. Delay only fuels rising house prices and rents leaving more people and



households in unsuitable and poor quality housing, placing more people into poverty even in working households and the attendant societal problems this brings.

*Q9. Should the Local Plan set housing requirements for designated neighbourhood areas in light of paragraph 66 of the NPPF?*

- 2.17 In principle we advocate housing requirements should apply to the defined housing market area. Where there are defined neighbourhoods preparing Neighbourhood Plans a requirement figure needs to be provided based on a suitable evidence base aligned with the housing market area.