



Warrington Local Plan Examination in Public: Hearing Statement

Matter 14: Monitoring and Review

On behalf of Richborough Estates Ltd.

In relation to land at Cherry Lane Farm, Lymm

Participant ID: 0430

August 2022

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1 INTRODUCTION

- 1.1 Asteer Planning LLP has been instructed by Richborough Estates Ltd ("Richborough") to prepare this Hearing Statement in relation to the Updated Proposed Submission Version Local Plan ("SVLP") and the Matters, Issues and Questions ("MIQs") posed by the Inspectors.
- 1.2 Richborough controls the site at Cherry Lane Farm in Lymm (Site Number: 0430¹) which has been promoted through the Local Plan process since 2017. The site is wholly deliverable (being suitable, available and achievable) for residential development and could deliver significant public benefits, as demonstrated robustly by the evidence presented in duly made representations in June 2019 and in November 2021 (Rep ID number: 0430/07).
- 1.3 In relation to Matter 14, the Inspectors have raised the following issue:
- "Whether the approach to monitoring and review is justified, effective and consistent with national policy."*
- 1.4 This Statement responds directly to the Inspectors' MIQs; however, it should be read in parallel with previous representations. Separate statements have been prepared in respect of the following matters and should be read in conjunction with this statement:
- Matter 3 (Spatial Strategy)
 - Matter 4 (Housing Need);
 - Matter 6a (Warrington Waterfront);
 - Matter 6c (Fiddlers Ferry);
 - Matter 7d (Lymm Allocations);
 - Matter 8 (Housing Land Supply); and
 - Matter 9 (Other Housing Policies).

¹ Omission Site Ref 22 (SHLAA Ref: 2705, Site Refs: R18/051, R18/101 and R18/P2/024)

1.5 It is our view that, for the reasons set out in this statement that a more robust approach to monitoring and review should be adopted, particularly due to concerns around the Councils housing land supply and housing trajectory. In summary, we consider that:

1. Main Modifications should be considered to address concerns over urban capacity, overall housing need and the rates of delivery assumed on major strategic sites; and
2. If Main Modifications are not proposed to allocate or safeguard additional sites that support a more balanced spatial strategy and provide flexibility that enables the plan to respond to any issues with delivery that might arise, then more explicit triggers should be included in policy to require an immediate review of the plan.

2 MONITORING AND REVIEW

Q2. How will any issues of delivery of housing be identified and addressed? Will this be effective? Q3. How will any issues of delivery of the Main Development Areas be identified and addressed? Will this be effective?

- 2.1 As set out in our response to Matters 3, 4, 6a, 6c, 8 and 9; we consider that the Inspectors should consider the need for Main Modifications to the Local Plan due to uncertainty around:
- The assumptions, capacity and level of development envisaged in the urban area;
 - The overall housing requirement, when considered in the context of economic growth, job creation and a worsening affordability crisis; and
 - The assumed trajectory and rate of delivery of homes within major strategic allocations, including Warrington Waterfront and Fiddlers Ferry, due to inherent constraints and infrastructure requirements that could significantly lengthen lead-in times to development.
- 2.2 We consider that any Main Modifications to address a shortfall in delivery should seek to allocate or safeguard additional sites in sustainable outlying settlements, such as Lymm, to support a more balanced spatial strategy and housing land supply. This would provide flexibility in the plan to enable it to respond to any issues with delivery that might arise – such as a delay in critical infrastructure or a rate of development in urban areas that does not keep pace with the assumed trajectory.
- 2.3 Richborough welcome some recognition in the monitoring framework (Policy M1) that a lack of housing delivery of the failure to deliver critical infrastructure will *“trigger the need for the consideration of a review or partial review of the Local Plan”*. However, this should go further and be more explicit.
- 2.4 If a critical piece of infrastructure, such as the Warrington Western Link road (to support the Warrington Waterfront strategic allocation), cannot be delivered in the timeframe envisaged (by 2026), following the preparation of a full business case or better understanding of costs and funding options, then this should trigger an immediate review of the Local Plan due to the implications for the delivery of the Local Plan that it will have.
- 2.5 Equally, if there is a significant delay in other strategic allocations, such as Fiddlers Ferry, following further investigation into constraints and the preparation of a realistic programme for delivery, this should also trigger an immediate review. These allocations are critical to the housing land supply in the middle of the Plan Period and if it becomes

clear that this supply is not deliverable, a new Local Plan process should be triggered early in the Plan Period to mitigate against a shortage of homes from 2027 onwards.

- 2.6 Also, if the total delivery of housing is less than 75% of the annual requirement for three consecutive monitoring years, policy should be explicit in setting out that this automatically triggers a Local Plan review. This will safeguard against longer term under-delivery, particularly if it is clear that urban sites are not delivering at the rates projected in the SVLP.