

**Barton Willmore, now Stantec on behalf of Miller Homes (Respondent No. 0435)**

**Examination into the Warrington Local Plan 2021-2038**

**Hearing Statement**

**Matter 14 – Monitoring and review**

Issue - Whether the approach to monitoring and review is justified, effective and consistent with national policy.

**Q1. How will the implementation and effectiveness of the Local Plan be monitored? Will the monitoring framework in Appendix 2 provide an effective basis to do this?**

1. The monitoring framework as set out is not sufficiently effective with respect to Policy DEV1 and the matter of housing delivery. A full response on this is below in relation to Q2.

**Q2. How will any issues of delivery of housing be identified and addressed? Will this be effective?**

2. Point 8 of Policy DEV1 states that should monitoring indicate that a 5-year deliverable and / or subsequently developable supply of housing can no longer be sustained, the Council will consider a review, or partial review of the Local Plan.
3. There are 3 key problems with this approach.
4. Firstly, this does not seem to be consistent with indicators set out in Appendix 2 of the Local Plan. While the indicators reference housing completion analysis and Strategic Housing Land Assessments being used, there is no reference to triggers that would result in a review, or partial review, being undertaken.
5. As such, the approach is not effective because there are no parameters set out which would result in action being taken. The implication of this is a lack of certainty that steps will be taken to ensure development needs, and in particular housing needs, are met over the Plan period.
6. Appendix 2 should be amended to include reference to a lack of a 5 year housing land supply over 3 consecutive years, and under 75% performance against the Housing Delivery Test resulting in the need for a Local Plan Review. These are established and widely used measures set out in national policy and, therefore, are appropriate for this purpose.

7. DEV1 should be amended to make clear reference to Appendix 2, once the above measures have been added. The wording of point 8 of DEV1 should be amended in order to make it more robust in terms of the requirement for a review. The proposed wording is below for reference:

*Should monitoring indicate that a 5-year deliverable and / or subsequent developable supply of housing land over the Plan Period can no longer be sustained the triggers set out in Appendix 2 be met (in relation to DEV1), the Council will ~~give consideration to~~ undertake a review or partial review of the Local Plan.*

8. Secondly, the target set within Appendix 2 is not based on the stepped requirement, as set out in DEV1. This results in an inconsistency.
9. For reasons set out in our Hearing Statement on Matter 4, the stepped requirement is inappropriate and should be deleted in favour of a conventional steady requirement across the whole of the Plan period.
10. However, if the stepped requirement remains, Appendix 2 should be amended to reflect this.
11. Finally, while a generic reference is made to a review / partial review of the Local Plan, there is no indication of how such a shortfall could be remedied.
12. Reference should either be made to the allocation of new sites in sustainable locations, or the release of safeguarded sites, in order to deliver new residential development. There should be a cross reference to the other measures outlined in Policy M1 for clarity.
13. The Local Plan should be amended to include the designation of safeguarded land to ensure that any review, or partial review, of the plan will not result in the need to release additional Green Belt land.

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

14. The changes proposed within the answer to Q2 would be sufficient to address general shortfalls in housing provision and so specific issues related to MDAs are not commented on further.

**Q4. What is the overall approach to reviewing the Local Plan?**

15. Policy M1(Local Plan Monitoring and Review) is currently not effective because it does not provide the provision for, or contain reference to the potential for new allocations to be made, or the release of safeguarded sites, to deliver development should the need to do so be triggered by under-performance of the Plan.

16. This represents a realistic option to realise the development of new homes relatively quickly and should therefore be added as an option for a local plan review, or partial review, to consider.
17. Point 3 of Policy M1 should also be amended in to remove reference to 'less than 75% of the annual requirement for those monitoring years', to a lack of 5 year housing land supply and performance under 75% against the Housing Delivery Test, as set out in the answer to Q2.

**Q5. Are any main modifications to Policy M1 necessary for soundness?**

18. Please see response to Q4.

19. In addition to this, in order for the Local Plan to be effective, point 3 of M1 should be amended to make it categoric that a review, or partial review, WILL be triggered. The wording should be amended to the following:

*... this will trigger the need for ~~the consideration of~~ a review or partial review of the Local Plan.*