

**Barton Willmore, now Stantec on behalf of Miller Homes
Examination into the Warrington Local Plan 2021-2038
Hearing Statement**

Matter 4 – Housing Need and the Housing Requirement

Issue - whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to housing need and the housing requirement.

Please note that this Hearing Statement relates to Miller's interests outside of the SEWUE. Separate statements have been prepared jointly with Homes England which address points related to the SEWUE.

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

1. The Warrington Local Housing Needs Assessment Update (August 2021) is not based on the most up to date available data inputs.
2. The forecast growth is taken from 2021 to 2031 and is given as 7,145 over that period. This should be changed to reflect the fact that it is now 2022 and the 10-year period to 2032 should be used. This produces a figure of 6,946.
3. The median workplace-based affordability ratio used in the Council's calculation is 6.27. This results in an adjustment factor of 1.42. This is taken from the 2020 figures released in March 2021.
4. These have since been superseded, with the most recent iteration released in March 2022 showing a figure of 7.08. This results in an adjustment factor of 1.19.
5. Applying these changes results in an annual local housing need figure of 828. Policy DEV1 should be adjusted accordingly, and additional allocations made to cover this increase.

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?

6. No response provided.

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?

7. No response provided.

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. 316ha?

8. No response provided.

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)?

9. No response provided.

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

10. No response provided.

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?

11. No response provided.

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?

12. The stepped approach is not justified or sound and does not meet the requirements of the NPPF. Paragraph 4.1.19 of the WLP suggests that the stepped requirement is a direct response to the SHLAA sites and allocations in the trajectory, rather than offering a specific evidence-based justification.

13. Paragraph 69 of the NPPF requires local planning authorities to consider a good mix of sites that can deliver across the plan period. In stating that a stepped requirement is needed the WLP is clearly acknowledging that the requirement to identify an appropriate range of sites has not been met and that the WLP is not identifying sufficient land to meet the Borough's housing needs in the first five years of the Plan. It is an acknowledgment that additional land is needed to meet those needs.

14. The PPG (Paragraph: 021 Reference ID: 68-021-20190722) is clear that a stepped requirement may be appropriate in certain circumstances, however, evidence is required to justify this approach so that it is not unduly delaying meeting development needs.

15. The Council has not produced clear and robust evidence to justify this and therefore the stepped requirement is not sound.
16. The justification of a stepped requirement that is provided by the Council currently relates to the lead-in time associated with the delivery of larger Green Belt release sites. It should be noted at this juncture that Miller does **NOT** object to the allocation of such sites as they will play a key role in meeting the overall housing requirement, including both during and beyond the Plan period.
17. What is not discussed in the justification is the presence of significant elements of town centre regeneration that is relied upon in the latter part of the Plan period. This delay and the potential issues associated with delivery mean that alternative sites should be sought to meet the housing requirement earlier in the Plan period, thus enabling the application of a constant housing requirement of 816 homes (or 828 homes as it should be) per annum and providing more certainty that the overall housing requirement can be met over the Plan period.
18. A further consideration is the fact that the Council cannot presently demonstrate a five-year housing land supply. This supply was 3.7 years in April 2019 and 3.9 years in April 2020. The most recent Housing Delivery Test result for Warrington is 72% (2021 figures released in January 2022). This triggers the presumption in favour of sustainable development and further demonstrates the trend for local housing needs to go unmet. The deliverable supply position from April 2021 is published in Table 5.1 of the June 2022 AMR as follows:

Table 5.1 – 5 Year “Deliverable” Housing Land Supply

	Number of Sites	Area (Ha)	Forecast Completions					Total	Total as %
			21/22	22/23	23/24	24/25	25/26		
PDL	44	109.05	653	868	410	281	158	2370	69.5
GF	12	63.01	161	231	196	161	86	835	24.5
PDL/GF	7	12.78	89	61	52	0	0	202	6.0
Total	63	184.84	903	1160	658	442	244	3407	100%

19. The utilisation of a stepped requirement would mean that the housing needs of Warrington would continue not to be met until later in the plan period. This represents a continuation of an existing trend of under delivery, which is a key issue that the WLP should be seeking to resolve.
20. Applying the Council’s own low housing requirement of 816 year per annum, the proposed stepped delivery would equate to a delivery of only 83% if the housing needs of the Borough.
21. This approach is particularly suspect in terms of meeting housing needs given the Council’s over-reliance on a significant number of PDL sites coming forward. The delivery of 1,741 homes in year 2028/29 looks to be particularly optimistic given the levels of delivery in the years leading up to it. This is shown clearly in Table 5.3 of the June 2022 AMR shown below.:

Table 5.3 - Developable (6-10 year period) Housing Land Supply (inc. Small Sites)

	Number of Sites	Area (Ha)	Forecast Completions					Total	Total as %
			26/27	27/28	28/29	29/30	30/31		
PDL	34	82.42	581	281	1741	408	167	3178	67.9
GF	8	86.3	130	120	207	164	153	774	16.5
PDL/GF	4	17.1	0	0	87	110	85	282	6.0
Small Sites	n/a	n/a	90	90	90	90	90	450	9.6
Total	46	185.82	801	491	2125	772	495	4684	100%

22. The Council is overly reliant on the delivery of brownfield sites throughout the Plan period as a whole, despite a consistent record of significant under-delivery on PDL sites for at least 6 years against the target. This is discussed full in the Hearing Statement on Matter 3. Large town centre sites have serious viability questions that are currently unanswered, which further adds risk, particularly in the context of the proposed stepped approach.
23. In order to remedy this position the WLP should not use a stepped requirement but a constant requirement throughout the plan period. Additional sites should be allocated to ensure that a 5 year housing land supply can be demonstrated from the point that the WLP is adopted and throughout the first 5 years of the plan period.
24. Sites allocated to meet this requirement should be able to be delivered quickly and without significant enabling infrastructure. Examples of suitable sites are Miller’s interests at Croft (Omission Site Profile 26), Lymm (Omission Site Profile 28), and Winwick (Omission Site Profile 25).
25. The opportunity for a Local Plan review also offers the opportunity for any slippage in housing delivery to be addressed; albeit this should not be relied upon as an excuse for not planning to meet needs in the early years of the Plan. However, the current wording of the WLP does not achieve this.
26. Policy DEV1 states that the Council will only give due consideration to a review or partial review of the Local Plan, this is not a firm commitment.
27. In the context of potential supply issues highlighted above, it is necessary to include a robust mechanism to ensure that the Council can demonstrate and maintain a deliverable 5-year housing land supply throughout the Plan period.
28. This should comprise a partial review of the Local Plan if necessary, triggered after a period of under-delivery (such as 3 years). This will provide greater certainty to developers in relation to the circumstances when further land release will be required. This should be applicable to the overall housing requirement figure rather than the stepped trajectory currently proposed.
29. Alternatively, safeguarded land should be identified so that in the event significant slippage occurs in the delivery of allocated or SHLAA sites, these can be delivered immediately to ensure that the local housing need continues to be met during those periods.

30. Miller's interests at Croft (Omission Site Profile 26), Lymm (Omission Site Profile 28), and Winwick (Omission Site Profile 25) would be suitable candidates for safeguarding given that they are deliverable with little need for significant new infrastructure.
31. The Plan as drafted is contrary to Paragraphs 31 to 33 of the NPPF that clearly sets out the need for Local Plans to be underpinned by relevant and up-to-date evidence and should be reviewed every 5 years.

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

32. No response provided.