

Barton Willmore, now Stantec on behalf of Anwyl Land Ltd (Representor ID: 0405)

Examination into the Warrington Local Plan

Matter 4: Housing Need and the Housing Requirements

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

1. Our Client recognises that the Council has calculated its Local housing Need based upon the standard method, but remains disappointed that doing so has resulted in a significant reduction in the housing delivery requirement through the evolution of the draft documents. This has seen the housing delivery requirement reduced from 945 to 816 dwellings per annum.
2. Planning Practice Guidance (PPG) makes clear that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors that might have an impact on demographic behavior (Reference ID: 2a-010-20201216). The standard method calculation does not produce a housing requirement figure, and would therefore reiterate our previous comments in urging caution in proposing that standard method calculation as the housing requirement.
3. Our Client would also reiterate their recommendation that the Council adopt a higher figure than the standard method calculation, and allocate additional sites accordingly.
4. Finally, it is noted that between the consultation on the submission version of the Plan and the submission of the document to the Secretary of State, the median workplace-based affordability ratios have been updated and that they now show a worsening in the affordability ratio. As our Client has stated through previous Representations, the Council is working on an assumption that the affordability of housing will no longer be an issue in 2038. Whilst we are not yet in 2038, the latest figures and the worsening ratio therein, would not support this view.

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?

5. Yes. As has been identified within the response to Q1, the figure calculated by the standard method is to be treated as a minimum. The PPG sets out that there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the standard method indicates. These include growth strategies for the area, strategic infrastructure improvements, meeting an unmet need from neighbouring authorities and where previous levels of delivery or previous assessments of need are significantly greater than the outcome of the standard method.
6. Our Client would seek confirmation from the Council that these circumstances have been fully explored and that the standard figure of 816 dpa, noting that this is the minimum figure, is a true reflection of the needs of the Borough. Our Client does not consider that providing the minimum housing required represent a positively prepared Plan.
7. Furthermore, it is also our Client's position that the Borough's approach to employment growth (jobs) and the number of homes to be provided is mismatched. Notwithstanding that Warrington has experienced significant levels of employment growth in the past, the Local Housing Needs Assessment Update (LNHA) (August 2021) confirms that a 'mid-point' forecast of employment growth has been adopted and this, as well as current commuting patterns, does not justify an

increase to the housing requirement to support employment growth in Warrington.

8. Our Client strongly opposes this approach and does not believe it has been sufficiently justified. In particular, the impacts of in-commuting are already an issue within Warrington. The existing motorway infrastructure struggles to accommodate the volume of commuting workers and experiences significant traffic congestion, particularly at peak times. The Council's stagnant approach to job growth and housing delivery will therefore, only increase the number of commuters and heighten this issue, which will have a number of social, economic and environmental impacts.
9. As a result therefore, it is clear that new homes should be provided to accommodate those who work within the Borough, in addition to those already proposed through the Plan, and this should be reflected in an increased housing requirement which, in turn, would require additional land to be identified for housing allocation.
10. It is also noted that the PPG states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes, the LHNA identifies an affordable housing need of 423dpa.
11. Our Client considers that it is important that the proposed housing requirement is viewed as a minimum and that barriers are not put in place which may hinder greater levels of sustainable growth. Our Client remains of the view that the Plan could facilitate higher levels of growth and provide greater flexibility.

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?

12. Our Client has no comments to make in relation to this question at this time.

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?

13. Policy DEV1 sets out the Council's requirement for the delivery of a minimum of 14,688 new homes to be delivered over the 18 year Plan period from 2021 to 2038 (equating to an average of 816 homes per annum). According to the Council's LHNA, this has been informed by the employment forecasts over the Plan Period.
14. As has been previously stated however, our Client considers that the Borough's approach to employment growth and the number of homes to be provided is mismatched. Notwithstanding that Warrington has experienced significant levels of employment growth in the past, the LHNA confirms that a 'mid-point' forecast of employment growth has been adopted and this, as well as current commuting patterns, does not justify an increase to the housing requirement to support employment growth in Warrington.
15. Our Client continues to strongly oppose this approach and does not believe it has been sufficiently justified. In particular, the impacts of in-commuting are already an issue within Warrington. The existing motorway infrastructure struggles to accommodate the volume of commuting workers and experiences significant traffic congestion, particularly at peak times. The Council's stagnant approach to job growth and housing delivery will therefore, only increase the number of commuters and heighten this issue, which will have a number of social, economic and environmental impacts.
16. Moreover, paragraphs 81 and 82 of the NPPF are clear that planning policies should help to create

environments in which businesses can invest, expand and adapt. It also goes on to state that planning policies should seek to address barriers to investment, including inadequate infrastructure, services or housing.

17. The delivery of homes and employment growth are therefore inherently linked, and that a planned increase in jobs and employment should be coupled with an appropriate level of housing growth which, at present is not the case. The result of this is that additional land and homes will be required, both to deliver the housing requirement but also to allow flexibility in how the requirement is met. Our Client's land interest represents one such option of an additional site that could make a meaningful contribution to the supply of housing in the short to medium term, or in the longer-term should the Council consider it appropriate.

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)?

18. Our Client does not have any comments to make in respect of this question beyond those made within Q4 above.

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

19. As set out within the response to Q4 above, our Client considers that the scale of employment land provision would justify an increase in the housing figure in order to ensure that housing, or lack thereof, does not represent a barrier to investment and economic development.

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?

20. As has been stated previously within this Statement, and extensively in relation to Matter 3, the local housing need as calculated by the standard method should be the starting point and the minimum amount. This approach is endorsed by the PPG and coupled with the factors specific to Warrington, our Client is firm in the view that a higher figure than 816 dph would be appropriate and justifiable in this instance.

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?

21. As has been reported by our Client through previous Representations, the Council has stated that a stepped requirement will be used so that in the first 5 years of the plan period the housing requirement is 678 homes per annum. This increases to 870 homes per annum between the years 6 – 18. The Council's justification for this as set out at paragraph 4.1.19 suggests that the stepped requirement is a direct response to the SHLAA sites and allocation in the trajectory, rather than offering a specific evidence-based justification.

22. 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 Council is effectively acknowledging that this requirement to achieve a range of sites has not been met.

23. 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 support this approach and it is not unduly delaying meeting development needs. It is our Client's position that the Council has not produced clear evidence to justify this and therefore the stepped requirement is not justified.
24. Recent monitoring and Housing Delivery Test measurements confirm that the Council has not delivered a sufficient quantity of homes over recent years and does not have an adequate supply of housing land. Given a similar trend in previous years, it is clear that a stepped approach to housing delivery is not justified.
25. It is important to remember that this is not just a theoretical mathematical numbers exercise but represents actual households in housing need today, so it is unreasonable to expect them to wait until later in the plan period before their current housing needs are addressed. The PPG sets out the circumstances where a stepped housing requirement may be appropriate these include where there is to be a significant change in the level of housing requirement or where strategic sites will have phased delivery or will be delivered later in the plan period. Our Client does not consider the stepped trajectory to be justified and would recommend that further sites should be allocated for delivery in the first five years of the plan.
26. Our Client would reiterate at this point that their land interest at Mill Lane represents one such site that could deliver new homes, and make a meaningful contribution to the Council's housing deficit in the early years of the Plan.

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

27. Paragraph 66 of the NPPF sets out that strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Paragraph 67 of the NPPF goes on to state that where it is not possible to provide a requirement for a neighbourhood area the authority should provide an indicative figure, if requested to do so by the neighbourhood planning body.
28. Our Client notes that there are emerging Neighbourhood Plans for Lymm, Grappenhall and Thelwall, in addition to one for Stretton. Furthermore, there is also an adopted Neighbourhood Plan for Appleton Parish. As a result of this, our Client considers that it would be prudent for each of these areas to have its own housing requirement. This would allow for greater certainty for both residents and developers alike.