

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

Examination into the Warrington Local Plan

Matter 8: Housing Land Supply

Q1 What is the up to date situation regarding actual housing completions so far in the plan period i.e. 2021/22?

1. Our Client considers that this is a question for the Council to answer, but notes that the 2021 Annual Monitoring Report (published in May 2022, document reference CD01) does not provide a figure for actual completions in 2021/22. It does however provide a forecast for 2021/22 which, including for a small sites allowance, indicates a total of 993 completions within the monitoring year 2021/22.
2. Whilst the current delivery figure has not been established by the Council, it is important to recognise the ambition of the forecast figure. If met, 993 completions would be the highest delivery figure within the borough since 2007/08, and would be approximately 400 dwellings more than completed in 2020/21.
3. It may well be the case that the forecast figure is accurate, and our Client welcomes the Council's ambitions in this respect. It cannot be ignored however that such a rate of delivery would not be in line with previous delivery trends and, given the previous years of under-delivery, and lack of adequate supply detailed within Matter Statements 3 and 4, any under-delivery against this forecast could compound the Council's supply problems.
4. Our Client would urge the Council to provide the latest delivery figures as soon as possible and, given the somewhat perilous position of its supply, coupled with very ambitious delivery forecasts, would also suggest identifying additional housing sites to build flexibility into the Plan, in the event that there is any slump in housing delivery.

Q2 For each of the following sources of housing land supply for the whole plan period in turn, what are the assumptions about the overall scale, lead in times, timing and annual rates of delivery? What is the basis for these assumptions and are they realistic and justified?

- a) SHLAA sites under construction***
- b) SHLAA sites with planning permission but not started (split by outline and full)***
- c) SHLAA sites without planning permission***
- d) Small site allowance (windfalls)***
- e) Each of the Main Development Areas involving housing***
- f) Each of the site allocations in outlying settlements***

5. Our Client considers that this is a question that the Council are best placed to answer. Notwithstanding this, the SHLAA (2021) sets out the standard lead in times and build out rate assumptions. The SHLAA also sets out the evidence for the small sites allowance, it highlights that an average of 90 dwellings have been completed on small sites over the last 10 years. Appendix 1 of the Local Plan sets out the Council's supply and trajectory. It includes a small sites allowance of 81 dwellings each year.
6. It is not known whether the Council has updated the information within the 2021 SHLA or the Local Plan to ensure that it is still appropriate, noting that the completions data for 2021/22 has not yet been published and could, depending on the nature of the data, influence the assumptions that are made. Our Client would urge the Council to publish this data as soon as possible to provide clarity on the matter. Our Client would also urge the Council to work closely with developers and the

property industry to ensure that the assumptions which underpin the Plan reflect the realities of sites included within the supply (noting our Client's previously cited concerns in this respect).

Q3 Would there be an adequate supply of housing land for the whole plan period?

7. The Local Plan sets a housing requirement of 14,688 dwellings over the Plan period 2021 to 2038. Appendix 1 of the Local Plan sets out the Council's trajectory and overall housing supply. It suggests that there is a supply of 16,676 dwellings, including 4,891 on Green Belt release sites.
8. Our Client has previously cited concerns, through earlier Representations and Matter Statements 3 and 4 around the delivery of certain sites proposed for allocation within the plan, as well as the lack of flexibility for the Plan to adapt should there be any slippage in the delivery of homes. To build on this further however, our Client would reiterate their concerns with the Council's approach to focussing the majority of development on previously developed land. Whilst the intention of this approach is admirable, our Client considers that a number of the sites are unviable or have other constraints such as flood risk. For example, the site at Causeway Park, Warrington, is identified within the SHLAA to be suitable for residential development with an indicative capacity of 59 dwellings. However, the site falls within Flood Zone 2, is currently in employment use and has issues with contaminated land. It is clear, therefore, there is a lack of evidence to support the deliverability of some sites identified within the SHLAA. Due to this uncertainty, it is clear that some SHLAA sites cannot make a contribution towards the Council's land supply as identified at Policy DEV1.
9. Through previous representations, our Client has requested evidence on all proposed allocations, and justification as to their selection. To this end, the Council recently published its site profiles to the allocations, and the omission sites. As highlighted in earlier Statements however, there is a high degree of inconsistency in approach to how the sites have been assessed, and no clear distinction between those that have been allocated, and those which have been omitted.
10. Notwithstanding this, there remains a sufficient level of evidence around the components of the supply, and whether they are actually deliverable. One such example is the Fiddlers Ferry site. This proposes a total of 1,310 new homes over the Plan period and is a significant component of the Council's housing land supply. Although our Client supports the removal of this Site from the Green Belt, it remains our position that the site needs to be adequately assessed before it is allocated within the Local Plan, and that the newly published site proformas do not go far enough in providing the required degree of evidence. There is currently a lack of evidence to support the allocation of the Fiddlers Ferry site, and there is no justification to confirm that it is capable of coming forward noting that there is known contamination on the site and unknown remediation costs and timescales. It is, therefore, our Client's position that the Fiddlers Ferry site cannot make a contribution towards the housing land supply at this time.
11. Whilst Fiddlers Ferry is just one proposed allocation in the Plan, the lack of evidence and justification on the proposed allocation is also true of a number of the proposed allocations. As a result of this, our Client cannot say, with any confidence, that the Council will be able to maintain an adequate supply of housing over the Plan period, however, the degree of doubt that looms over the allocations is telling, and given the previously cited lack of flexibility within the Plan, our Client considers that it is highly unlikely that the Council will be able to maintain an adequate supply of housing.
12. As such, it is clear that the Local Plan needs to increase the number of greenfield and Green Belt sites in higher value areas, which offer more certainty of delivery within the Plan period. Our Client's land interest at Mill Lane, Lymm is available and poised to quickly deliver much needed homes within the short to medium-term and therefore urges that additional sites, including the land at Mill Lane, are incorporated into the Plan as housing allocations.

13. Our Client's previously submitted Vision Document for the land at Mill Lane, demonstrating its acceptability and deliverability, is appended to this Statement for ease of reference.

Q4 Overall, would at least 10% of the housing requirement/target be met on sites no larger than one hectare (in light of paragraph 69 of the NPPF)?

14. Our Client recognises the importance of having at least 10% of the housing requirement provided on smaller sites no larger than 1 hectare, noting that this can contribute to a good mix of sites to suit a variety of developers. They can also often be delivered quicker than the larger sites and make an early, meaningful contribution to the Council's supply of housing land.
15. As is also the case for larger sites, our Client considers that the Council should look to identify additional sites, of varying sizes, to build flexibility into the Plan and ensure that the Council is well placed to react should there be any slippage in delivery. As has previously been mentioned, there is very little room to manoeuvre within the Plan, and with the previously cited concerns around the delivery of some of the proposed allocations, it is vital that the Council bolsters its position by identifying sites at this stage.

Q5 In terms of a five year supply and paragraph 74 of the NPPF, is a 20% buffer appropriate?

16. Paragraph 74 of the NPPF sets out that Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. In addition, it states that the supply of specific deliverable sites should also include an appropriate buffer. Where there has been significant under delivery of housing over the previous three years, a 20% buffer should be applied, measured against the Housing Delivery Test (HDT).
17. The latest HDT measurement confirms that the Council has only delivered 72% of the homes required over the previous years. As a result of this degree of under delivery, our Client considers that the 20% buffer prescribed by the NPPF is appropriate.

Q6 Taking 2022/23 as the base year, what would be the five year requirement (assuming the stepped annual requirement and adding any shortfall or subtracting any surplus in delivery since 2021 before applying a buffer)?

18. As outlined in Q1 above, although the Council have provided a forecast figure for 2021/22 of 993 completions, they are yet to publish the actual completion figures. As a result, it is not currently possible to determine the five-year requirement for the Council.
19. Our Client reserves the right to comment further on this matter once the required information is made available, and would urge the Council to publish the data as soon as possible.

Q7 What would be the supply for this period (in total and by each source of supply)?

20. Our Client considers that this is a question that the Council are best placed to answer, having regard to updated completions data for 2021/22 as requested above.

Q8 Are the assumptions on the sources of supply for this period realistic and justified?

21. As stated above, the Council are yet to provide updated completions data for 2021/21 and as such have not presented an up-to-date housing supply figure for 2022 and beyond. Our Client would urge the Council to produce, and publish this data as soon as possible to provide clarity on the matter going forward.
22. Notwithstanding this however, our Client would expect the Council to ensure that they are able to demonstrate the deliverability of all of the sites included within the housing land supply, particularly those which do not currently benefit from planning permission. In this regard, our Client would reiterate their previously cited concerns around the deliverability of some of the proposed allocations and would again urge the Council to consider incorporating additional housing allocations within the plan to bolster the supply and ensure that the Council has the means to react to any slippage in delivery. They would again highlight that their land interest at Mill Lane, Lymm represents one such candidate that could make a meaningful contribution within the short to medium-term of the Plan.

Q9 Would there be a five year supply of housing land (from 1st April 2022)?

23. As stated above, the Council are yet to provide updated completions data for 2021/21 and as such have not presented an up-to-date housing supply figure for 2022 and beyond. Our Client would urge the Council to produce, and publish this data as soon as possible to provide clarity on the matter going forward.
24. Notwithstanding this however, and as stated within previous questions, our Client has significant doubts over the deliverability of a number of allocations within the Plan. Coupling this with a lack of flexibility within the Plan to react to slippage, our Client does not consider that the Council would be able to demonstrate a five year supply of housing land at the 1st April 2022.