

Langtree Property Partners

Warrington Local Plan Examination

Hearing Statement – Matter 8

August 2022



01 Introduction

Introduction

- 1.1 This is a Hearing Statement prepared by Spawforths on behalf of Langtree Property Partners (Langtree) in respect of:
 - Matter 8: Housing Land Supply
- 1.2 Langtree has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- 1.3 The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with Langtree's comments upon the Warrington Local Plan 2021-2038 Submission Version, dated November 2021.
- 1.4 Langtree has also expressed a desire to attend and participate in Matter 8 of the Examination in Public.

02 Matter 8 – Housing Land Supply

Issue

- 2.1 Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach to housing land supply.

Questions

Question 1: What is the up to date situation regarding actual housing completions so far in the plan period i.e. 2021/22?

- 2.2 Langtree do not have any comments on this particular issue.

Question 2: 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?

- 2.3 In relation to part d) small site allowance (windfalls) Langtree considers the evidence does not fully reflect national policy and guidance and should show that such a quantum will continue for the lifetime of the Plan. Currently the Plan does not include any evidence for the Small Site Allowance. Langtree accepts that small sites should continue to come forward, however the trajectory in Appendix 1 suggests that these will occur from Year 1. There could therefore be an element of double counting. Furthermore, the rate appears to be consistent at 81 dwellings per annum and assumes within Year 1 onwards that planning applications for 81 homes will be submitted, approved, commenced and completed each year. This approach does not reflect Best Practice or that windfalls will reduce in the future upon adoption of an up to date Local Plan.

Question 3: Would there be an adequate supply of housing land for the whole plan period?

2.4 Langtree has highlighted some questions on delivery rates and trajectory in some complex sites, such as Fiddlers Ferry. Langtree would also like to highlight the recent Secretary of State decision which shows that the Council do not have a five year housing land supply and that very substantial weight was placed on this issue. Langtree considers a more reasonable and pragmatic approach should be shown and that further sites should be identified and flexibility accommodated into the Plan.

Question 4: 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)?

2.5 Langtree do not have any comments on this particular issue.

Question 5: In terms of a five year supply and paragraph 74 of the NPPF, is a 20% buffer appropriate?

2.6 Langtree considers there should be a 20% buffer as there has been significant shortfall in housing delivery, as recognised by the recent Secretary of State decision which shows that the Council do not have a five year housing land supply. Furthermore, the Housing Delivery Test for 2021 has a percentage of 72%, which further reinforces the under delivery of housing and the need for further flexibility in the Plan.

Question 6: 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)?

2.7 Langtree do not have any comments on this particular issue.

Question 7: What would be the supply for this period (in total and by each source of supply)?

2.8 Langtree do not have any comments on this particular issue.

Question 8: Are the assumptions on the sources of supply for this period realistic and justified?

- 2.9 The Council's overall housing land supply should include a mix of short and long-term sites. It is generally recognised that housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings, including affordable housing, to meet their housing needs. Such an approach provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market. Therefore, it is important that Langtree' site at Appleton Thorn is considered as a smaller non-strategic site that can importantly deliver affordable housing.
- 2.10 It is critical that an accurate assessment of availability, suitability, achievability and therefore deliverability and viability is undertaken. The Council's assumptions on lead in times and delivery rates should be correct and supported by promoters responsible for the delivery of housing on each individual site. This will allow a clear statement on five year housing land supply at the point of adoption.

Question 9: Would there be a five year supply of housing land (from 1st April 2022)?

- 2.11 The Housing Land Supply position within the Council's evidence base has not been updated recently. Langtree has highlighted some potential supply issues and suggests that further sites are identified to provide further flexibility within the Plan, such as their site at Arley Road, Appleton Thorn.

Proposed Change

- 2.12 To overcome the soundness matters Langtree proposes the following changes:-
- Identify further sites to increase flexibility in the Plan, including Arley Road, Appleton Thorn.