

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

Examination into the Warrington Local Plan 2021-2038

Hearing Statement

Matter 8 – Housing land supply

Issue - 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.

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

1. No response provided.

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

2. No response provided.

b) SHLAA sites with planning permission but not started (split by outline and full)

3. The evidence base produced by the Council does not appear to break down the supply of non-allocated SHLAA sites in terms of those which do have planning permission and those that do not in a way that is simple to understand.
4. While proformas have been produced for each site, the results of this should be set in a trajectory to aid understanding in a similar way to Appendix 1 of the WLP, but with more detail on the sources of SHLAA sites.
5. Given the current lack of information, it has not been possible to provide a detailed answer to this question.

c) SHLAA sites without planning permission

6. The evidence base produced by the Council does not appear to break down the supply of non-allocated SHLAA sites in terms of those which do have planning permission and those that do not in a way that is simple to understand.
7. While proformas have been produced for each site, the results of this should be set in a trajectory to aid understanding in a similar way to Appendix 1 of the WLP, but with more detail on the sources of SHLAA sites.
8. Given the current lack of information, it has not been possible to provide a detailed answer to this question.

d) Small site allowance (windfalls)

9. No response provided.

e) Each of the Main Development Areas involving housing

10. Our Hearing Statement on Matter 6a relating to the Waterfront Major Development Area detailed significant concerns relating to the deliverability of this site. As such it is appropriate for the site to be removed from the housing trajectory.
11. This results in the loss of 1,070 homes from the trajectory.

f) Each of the site allocations in outlying settlements

12. Our hearing statements provided on matters 7a – Croft, 7d – Lymm, and 7e – Winwick, show that there are significant issues relating to the delivery of allocations OS1, OS4, and OS6.
13. Given the issues present, a total of 375 homes should be removed from the trajectory.

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

14. A total of 1,445 homes should be removed from the trajectory as detailed above.
15. This results in a total supply of 15,228 across the plan period.

16. As such, there is a shortfall against the 16,157 home requirement set out in Table 1 of the WLP (noting that this includes a 10% increase for flexibility). The shortfall equates to 929 homes.

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)?

17. No response provided.

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

18. Given that the Council cannot demonstrate a five-year supply of housing land according to its own Strategic Housing Land Availability Assessment 2021 (Examination Document H4) and the latest Housing Delivery Test results (2021) show that it only delivered 73% of its requirement, the 20% buffer is entirely justified.

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)?

19. See response to Q9.

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

20. Total supply shown in answer to Q6.

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

21. See discussion at Q2 part f.

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

22. Based on a stepped requirement the following housing land supply has been calculated. This is based on the removal of OS1, OS4, and OS6 as referred to above.

23. It is likely that there will be delivery issues related to SHLAA sites within the wider urban area. However, as discussed in relation to Q2 there is insufficient information to critique this properly. We reserve the right to comment further on this matter once the Council's response to Q2 has been made available.

24. The calculation below is therefore a best case scenario in terms of the 5 year housing land supply.

Variable	Commentary	Figure
Basic Requirement	5 x Stepped Requirement Figure of 678.	3,390
Buffer	20% based on paragraph 74 of NPPF	4,068
Supply of Deliverable Homes	Based on removal of OS1, OS4 and OS6. Other sites within SHLAA remain.	3,860
Annual Requirement Including Buffer	Total Housing Requirement / 5	814
Number of Years Supply	Deliverable supply of homes / Annual Housing Requirement	4.74

25. The Council can therefore not demonstrate a five-year housing land supply, even with the use of the stepped requirement. To remedy this, the Council should make more deliverable allocations in outlying settlements. Examples of this include Miller's interests at Lymm, Winwick, and Croft.

26. If the stepped requirement is not used then the shortfall becomes more acute. This is shown in the table below.

Variable	Commentary	Figure
Basic Requirement	5 x Non-Stepped Requirement of 816	4,080
Buffer	20% based on paragraph 74 of NPPF	4,896
Supply of Deliverable Homes	Based on removal of OS1, OS4 and OS6. Other sites within SHLAA remain.	3,860
Annual Requirement Including Buffer	Total Housing Requirement / 5	979
Number of Years Supply	Deliverable supply of homes / Annual Housing Requirement	3.94

27. This furthers the case for additional allocations that can delivery homes early in the plan period. Examples of these include Miller's interests at Lymm, Winwick, and Croft.