



Kerry Trueman
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EP ref: 19-202

Dear Kerry

**Re: Response to additional documents on behalf of Wainhomes (NW) Ltd (UPSVLP 2471)
Warrington Local Plan Examination**

We write in relation to the following additional documents produced by Warrington Borough Council during the hearings:

- CD13a – Note on Updated Housing Trajectory including 2022 monitoring data
- Western Link documents (CD09, 29 and 30)

Updated housing trajectory

Our key concerns were set out within our Matter 8 Hearing Statement and during the hearing session. The new information does not change our key conclusions, which are as follows:

- The scale of delivery which is anticipated to come from SHLAA sites is significantly overestimated.
- There is a lack of sufficient flexibility in the supply given the reliance on SHLAA sites.
- The Council has stated that no double counting of small sites has taken place as the small sites allowances has not changed to reflect more recent trends. However, our concerns regarding double counting of these sites remain as this approach is not consistent with the Framework. In addition, there is a lack of compelling evidence to demonstrate that these sites will come forward as planned.



- Whilst the timescales for delivery of the Waterfront (MD1), Fiddlers Ferry (MD3) and SEWUBE (MD2) sites has been amended, we still do not consider that they are deliverable in the timeframes envisaged. The lack of evidence to support the funding of these projects means that the lead in times remain very optimistic and are very high risk as the best-case scenario, if they do come forward at all.

Western Link Road

The funding issues surrounding the proposal and increase of £57m in the estimate costs (CD09, page 1) has raised further concerns as a number of sites, including Waterfront, are reliant on the Western Link coming forward. Our concerns are further detailed below:

- We do not consider that CD30 is a realistic reflection of the likely timescales for the Western Link delivery programme. The timescales for the planning application being taken to committee are overly optimistic at just 4 months following validation, given the scale of the proposal.
- CD29 fails to take into account the increase of estimated costs by £57m, despite being prepared after CD09. The shortfall in funding is outlined below:
 - The scenarios set out in CD29 are on the basis of £212.7m, of which 33% would need to be provided by the Council (£70.2m).
 - Scenario 1 - The total amount the Council would need to repay has been estimated at £113.39m, including interest on borrowing (CD29). The total repayment profile equates to £117.1m, on the basis of the New Homes Bonus & CIL, NNDR (Warrington Waterfront) and Land Sales.
 - Scenario 2 – A total of £77.53m could be contributed towards the Western Link Road from the Omega development.
 - 33% of the now proposed £269m estimated cost would be approximately £89m.
 - Scenario 1 – given that the repayment amount is only £4m above the required repayment fee, it is unlikely that this would be sufficient to cover any borrowing interest associated with the higher figure of £89m.
 - Scenario 2 – it is clear that the £77.53m from the Omega development would not cover the increased costs.
 - On the basis of the above, the Council would appear to be reliant on the Waterfront development in either Scenario. This is of course assuming that the Government funding can be agreed.
- The funding issue is also of concern and CD29 clearly states that the opening date in November 2028 is reliant on all funding being resolved by early in 2023. This seems unlikely given that we are now only 2 months away from 2023.

Yours sincerely
Emery Planning

John Coxon

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