



EIP SUPPLEMENTARY STATEMENT MATTER 3A - METACRE

Supplementary Statement in response to post-submission documents in connection with Matter 3a Housing and Green Belt

Metacre / Northern Trust – Respondent 2347

OCTOBER 2022



1 INTRODUCTION

1.1 This Supplementary Statement has been prepared on behalf of Metacre in response to the invitation made by the Inspectors on 10th October to participants on a range of additional material presented by the Council, namely:

- CD09 Note to Warrington local plan EiP inspectors
- CD09a Western Link Information
- CD09b IDP Update
- CD13a Note on Updated Housing Trajectory including 2022 monitoring data
- CD29 Matter 6a Note on Western Link funding
- CD29a Matter 6a letter from Faisal Rashid MP
- CD29b Matter 6a Response to Faisal Rashid MP
- CD30 Matter 6a Western Link delivery programme - EiP Update

1.2 Metacre is also a member of the Home Builders Consortium (representor ID UPSLVLP 0410) represented by Lichfields, (the “Consortium”).

1.3 The Consortium has separately made representations to Matter 4 Housing Requirement, Matter 6a Warrington Waterfront, Matter 6c Fiddlers Ferry and Matter 8 Housing Land Supply. This Supplementary Statement draws upon the conclusions of those representations and does not seek to replicate the positions except as necessary to summarise the finding.

2 ANALYSIS

2.1 From the evidence presented by the Consortium five threads emerge which all individually and in combination lead to an inescapable conclusion that additional housing allocations need to be made. Those threads are:

- i. Likely level of employment that could be accommodated on 316 ha of employment land would significantly exceed the local labour supply if a housing target of just 816 dpa is pursued [Conclusion on Matter 4, CD10 and CD10a, Lichfields’ Supplementary Statement for the Consortium, para2.24]



- ii. Failure to increase the housing target whilst maintaining the employment land target and job growth strategy, which is supported, will lead to escalating house prices, unaffordability and high levels of in-commuting and congestion, Ibid, para2.25]
- iii. There is a significant shortfall in the Western Link funding gap before the road infrastructure can be delivered to enable the 1,335 homes assumed for delivery within the plan period at Warrington Waterfront [Conclusion on Matter 6a, CD09, CD09a, CD29, CD29a, CD29b and CD30, Lichfields' Supplementary Statement for the Consortium, para2.19]
- iv. Housing delivery as set out in the housing trajectory is wholly unrealistic for the redevelopment of Fiddlers Ferry and should be pushed back eight years in programme assuming that the site can be proven as viable to retain within the housing supply [Conclusion on Matter 6c, CD31, Lichfields' Supplementary Statement for the Consortium, para2.16]
- v. The Council's Updated Housing Trajectory (CD13a) overstates potential supply by reason of:
 - a. Double counting of small sites allowance
 - b. Significant over-estimate of SHLAA capacity within the Wider Urban Area in year 2021/22 with a 64% discrepancy bringing into question forecast accuracy over the plan period
 - c. Inclusion of Warrington Waterfront when there is considerable uncertainty as to the delivery of the Western Link road to enable development
 - d. Over-estimation of supply from Fiddlers Ferry (itself subject to viability) with first completions not expected until 2033, eight years later than set out in the trajectory[Conclusions on Matter8, CD13a, Lichfields' Supplementary Statement for the Consortium]

2.2 Agreement to even one of the five threads will require identification of additional housing land within the plan period to meet the shortfall. Agreement to more than one thread clearly raises the level of additional housing land that will be required.



- 2.3 Combined the impact of no delivery from Warrington Waterfront (- 1070 homes from the trajectory), Fiddlers Ferry (-575 homes) and removal of double counting (- 635 homes) creates a shortfall in identified supply of 2,280 homes.
- 2.4 This figure excludes any correction for uncertainty of supply from SHLAA sites and whether Fiddlers Ferry may be unviable and fully excluded from the trajectory (an additional 735 homes removed).

Response

- 2.5 Three responses individually or in combination are available to respond to the shortfall; to allocate additional housing land in the Local Plan; a reserve allocation site; and to allocate Safeguarded Land.
- 2.6 Each response must continue to conform to the Spatial Strategy (Option 2) to enable sustainable, incremental growth at outlying settlements.

Allocation response

- 2.7 Without doubt it will not be possible to identify the shortfall in housing through windfall sites within the urban areas (SHLAA sites) given that there is significant uncertainty on deliverability identified and that that Council's approach has sought to already maximise such delivery within the plan period. This will require allocations outside the urban areas and release of green belt land.
- 2.8 It has been Metacre's long-standing position that land at Phipps Lane, Burtonwood, former allocation OS1 in PVSLP (2019) should be reinstated in the Local Plan as an allocation. It is a site that is available now, a suitable location for development now and realistically achievable within five years. This point has not been disputed by the Council in its evidence base to the plan. Its sole point of objection is a narrow matter on an undefined and unsubstantiated transport impact concerns. And, despite having opportunity to expand on its concern at the Matter 3 Hearing Session, it maintained only it was an on-going matter of discussion with St Helens Council.
- 2.9 We maintain in our submitted evidence that an allocation can be made with certainty as part of a wider need for allocations in line with the spatial strategy to meet the shortfall.



Reserve allocation response

- 2.10 Even if the Council’s optimistic housing trajectory is accepted there remains a substantial risk of failure because of the matters summarised above in the Consortium’s response. It is a proportionate response to provide reserve allocations to come forward if supply fails to materialise. It not only improves the effectiveness of the Plan but would remove a necessity to an early plan review which would be the only option available to the Council. Early review is not in the public interest, not least that it would repeat the failings of the adopted Core Strategy to see another early review of Green Belt, contrary to objectives of NPPF para. 140.
- 2.11 Land at Burtonwood would be candidate for reserve allocation(s). Not only would this conform to the spatial strategy but it would provide opportunity to rectify the omission of Burtonwood for growth aligned to that strategy.
- 2.12 If we accept the Council’s position that the transport / highway concerns prevent an allocation now at Burtonwood then it is also the case that those concerns must be addressed in 4-5 years, i.e. 2026/27. This is because the master plan for the Bold Garden Suburb as set out in the St Helens Local Plan (OD05, policy LPA11: Bold Forest Garden Suburb) is forecast to see first completions in 2028 Q4¹.
- 2.13 This would align with allowing potential development of a reserve allocation at Burtonwood from Years 6-10 in the housing trajectory which in our view will almost inevitably become necessary as the wider failings on supply for SHLAA sites and proposed allocations becomes apparent. Again it is our position that the land at Phipps Lane, Burtonwood is the most suitable candidate site at this settlement for a reserve allocation.

Safeguarded land response

- 2.14 The Hearings Sessions on Matter 3 debated the Council’s lack of provision for safeguarded land in the plan. Given the potential shortfall in housing requirement and uncertainty in connection with the SHLAA capacity forecasts, this undermines the

¹ OD05, policy LPA11, “Reasoned Justification” paras.4.39.6 - 4.39.8 sets out delivery of 510 units at 60 dpa by 31 March 2037, i.e. first completions by 2028 Q4. This will require relevant planning permission in place prior meaning supporting evidence including matters of transportation must be resolved – including consultation with Warrington Council as adjacent authority – reasonably by 2027 at latest, potentially sooner.



Council's contention it has a relevant, deliverable urban capacity for housing beyond the end of the plan period to negate necessity to allocate safeguarded land.

- 2.15 Allocation of safeguarded land would provide candidate sites for a plan review which will become necessary should the housing supply fail to keep up with the ambitious forecast in the Council's trajectory.

- 2.16 Once more the site at Phipps Lane, and in this case we would argue the wider parcel to north and east to meet Lumber Lane (Parcel BW3, GB5a Green Belt Assessment Appendix F – 2016), would be a suitable candidate site for safeguarded land. Indeed it would be possible and desirable for effective plan-making to allocation / reserve allocate the site at Phipps Lane and to designate safeguarded land on the residual GB Parcel BW3.