

Matter 4: additional statement in relation to CDs 10 and 10a

Provided on behalf of Peel L&P (Holdings) Ltd (Representor ID 0426)

This statement is provided on behalf of Peel L&P (Holdings) Ltd in relation to additional evidence submitted to the Warrington Local Plan Examination by Warrington Council in relation to Examination Matter 4. This evidence comprises:

- CD10 Note on Employment Capacity of Development Land 130922
- CD10a Additional Note responding to Inspectors' Queries

We welcome the presentation of the analysis of the potential job growth that is estimated to be able to be accommodated through the delivery of the proposed allocations of land. We understand that further to the correction in CD10a, it is the Council's position – noting the stated caveats – that based on the assumptions it has applied, in the order of 33,386 jobs (1,964 per annum) could be created in Warrington over the plan period.

We acknowledge, as set out in our Matter 4 hearing statement, that it is challenging to directly compare the job growth suggested by employment forecasts to the scale of job growth which could be potentially generated following the development of allocated land. It is apparent, however, that the evidence provides a reasonable basis for concluding that it is likely that the successful provision of the Plan's policies for employment land will support the creation of more jobs than the mid-point employment forecast (874 per annum or circa 14,858 over the plan period) used to inform the Council's planned provision of 816 homes per annum.

This confirms that there is a significant risk of misalignment between these two policy strands which has the potential to act as a barrier to investment, contrary to the NPPF (paragraph 82c).

As we explained in our Matter 4 statement where our technical submissions¹ have concluded that the provision of 816 homes per annum would be insufficient to accommodate even 874 jobs per annum, we continue to consider that there is a clear justification for the Council increasing its housing need figure above the minimum figure generated by the standard method to ensure that it supports its economic growth strategy.

Furthermore the calculated potential scale of employment generation, a significant proportion of which is understood to be potentially accommodated on sites which are anticipated to see development responding to current high and pent up demand (e.g. in the logistics sector), emphasises the absence of a justification for the proposed stepped housing trajectory and the risks it would present in allowing housing need and supply to become further out of balance.

We separately note the Council's publication of Document CD15, which presents a modification considered to be required to address the potential for higher job growth, as indicated could occur in Documents CD10 and CD10a. Whilst as set out above we consider that the evidence presented substantiates an elevation of the housing requirement in the draft plan we welcome the principle of the modification.

¹ UPSVLP-0426-P2. This is the latest of a series of evidenced based submission and is titled 'Paper 2: Technical Review of the Proposed Housing Requirement, which was produced by Turley on behalf of Peel L&P as one of a number of papers submitted during the consultation on the updated Proposed Submission Version of the Warrington Local Plan

The current drafting of the modification, however, does not provide adequate clarity to enable its effective application. Furthermore, the suggested 'trigger' of 3 consecutive years of stronger-than-forecast job growth fails to recognise the real-world nature of employment change within and over a period of this length or the relationship with housing need and demand.

It is not uncommon for a local economy of the scale of Warrington to see a degree of volatility annually, recognising the unusual consequence of business investment and disinvestment as well as the occupation of new floorspace. The impact of the net growth in jobs is better considered by way of an average, with a 3-year period as suggested, a reasonable period in which to reflect a reasonable trend of strong growth (or otherwise). The same is also true in judging the delivery of housing over the same period where our suggested modification below is aimed at ensuring the two remain sufficiently aligned.

- A modification is therefore proposed to the additional text presented in paragraph 3 of the Policy M1 Monitoring Framework:

*3. Where total delivery of housing is less than 75% of the annual requirement **on average over three consecutive monitoring years, or if more than 874 jobs per annum are created on average over three consecutive years**, this will trigger the need for the consideration of a review or partial review of the Local Plan.*