

Representations to Main Modifications

For Wain Homes (North West) Ltd (UPSVLP 2471) | 19-202

Main Modifications Spring 2023 - Warrington Local Plan Examination

Project: 19-202
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1. Introduction

1.1 Emery Planning is instructed by Wain Homes (North West) Ltd (hereafter referred to as “Wain Homes”) to submit a written response to the Proposed Main Modifications document ID09. Wain Homes has an interest in the following omission sites:

- Land at Lumber lane, Burtonwood; and,
- Land at Runcorn Road, Moore – part of the former draft allocation: Warrington South West Urban Extension.

1.2 This statement should be read in conjunction with Wain Homes’ detailed representations to the Regulation 19 Pre-submission Draft of the Warrington Local Plan and the Hearing Statements submitted to the examination.



2. Response to Main Modifications

South East Warrington Employment Area (SEWEA): MM 024

- 2.1 Modification reference MM 024 proposes the deletion of the SEWEA as an employment allocation which would provide 137ha of employment land to meet strategic and local employment needs. This represents a significant reduction in employment land of almost 47%. Wain Homes do not consider this proposed Main Modification to be justified or positively prepared.
- 2.2 The deletion of the employment allocations appears to have been informed by the imbalance between the labour supply resulting from the level of housing growth (18,300 jobs) and the additional total jobs created by the employment requirement (44,900). This is detailed in the Inspectors' post hearings letter to the Council (ID06), which states:
- “There is a significant disparity between the employment land requirement in the submitted Local Plan and the level of housing proposed. This is in the context of a Local Plan which proposes alterations to the Green Belt to allocate land for employment and housing. The employment land requirement of 316.26ha is not justified therefore.”
- 2.3 However, it is not clear whether all other reasonable alternatives had been considered before the proposed deletion of the employment site, in order to rebalance the housing and employment land requirements. We consider this in more detail below.

Increasing the housing requirement

- 2.4 Paragraph 35 of the Framework requires Local Plans to be positively prepared and provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs. Paragraph 61 of the Framework states that strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. Paragraph 2a-010 of the PPG provides guidance on when it is appropriate to plan for a higher housing need figure than the standard method, which is described as the 'minimum starting point'.
- 2.5 The examples given in the PPG for when local housing need could be exceeded are not exhaustive. The PPG recognises at paragraph 2a-010 that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. If the amount of housing growth is not sufficient to align with jobs growth, this will serve to constrain economic growth and place significant strain on the housing market due to the



additional demand. It would also worsen affordability further if the jobs growth is not matched with sufficient housing growth.

2.6 The Inspectors' letter (ID06) makes it clear that on the basis of the evidence provided by the Council, including CD10 and CD10a, the employment growth resulting from the employment land requirement is unlikely to be supported by the labour supply resulting from the housing growth across the plan period.

2.7 The 2021 update of the Economic Development Needs Assessment (EC2) concludes at paragraph 9.6:

“It is therefore recommended (as in the 2016 and 2019 EDNAs) that Warrington Borough Council use the roll forward of historic take-up as the main measure of Warrington's future land need for the period up to 2038. The Strategic/Local Take Up Model best accounts for the full range of need the Borough will face over the next 18 years. This indicates a need of 316.26 ha to 2038, incorporating a three-year buffer and an allowance for the impacts of Town Centre redevelopment. Measured against the Borough's current realistic supply there is a shortfall of 277.39 ha.”

2.8 It is therefore acknowledged that there is a demonstrable need for 316.26 ha of employment land to be delivered over the plan period, and it is the supply of housing which is fundamentally the issue.

2.9 The Regulation 19 representations submitted by Lichfields on behalf of the House Builders Consortium (UPSVLP 0410), which included Wain Homes, further highlighted at paragraph 3.22:

“the Council's own evidence suggests that they are planning for a level of employment land growth, at 316.26 ha, that in the past sustained 2,015 jobs annually – a figure 87% higher than the 1,078 p.a. job growth the 816 dpa SM2 housing target equates to”

2.10 It is therefore clear that there is a need for the employment requirement to, at minimum, revert to the submission version Local Plan draft, and it is the labour supply which should be subject to changes to support the identified employment needs. The further decrease in the housing requirement through the deletion of allocations will also have a negative impact on the labour supply available in the future.

Draft allocations MD1, MD3 and MD4 (MM019, MM021 and MM023)

2.11 Whilst we do not oppose the proposed amendments in principle, we consider that the dwellings lost should be replaced with deliverable sites. The impacts of the amendments on the housing supply are discussed in turn below.

MD1 – Waterfront

2.12 Allocation MD1 is no longer expected to deliver homes within the plan period due to the unreliable funding for the scheme. The proposed housing delivery of this allocation within the plan period comprised 1,070



dwellings, which would have made up over 7% of the housing requirement of 14,688 dwellings and is a significant reduction in housing supply.

MD3 - Fiddlers Ferry

- 2.13 The proposed amendments to Allocation MD3 at Fiddlers Ferry, including the reduction in deliverable units from 1,800 to 860 dwellings (a loss of 940 units) within the plan period, also represent a significant amendment to the supply over the plan period.
- 2.14 In light of the significant reductions in the housing supply over the plan period, it is necessary to revisit the previously assessed sites and allocate land for housing development. We address the issue of flexibility specifically below.

Flexibility

- 2.15 The concerns raised in Wain Homes' response to Question 3, Matter 8 in relation to the flexibility allowance are exacerbated by the above proposed Main Modifications.
- 2.16 The housing requirement across the plan period remains at 14,688 dwellings, however the supply now indicated in the Main Modification trajectory, it stands at 15,288 dwellings. The trajectory now indicates a flexibility allowance of approximately 4% and it is important to highlight that this is based on the best-case scenario. The position is now even worse than the Council presented at the examination. A 4% flexibility allowance, in an authority tightly constrained by Green Belt, is highly unlikely to be sufficient.
- 2.17 It is crucial that a sufficient flexibility allowance is provided over the plan period. The proposed housing supply now provides less than half of the flexibility offered at the time of submission of the draft plan to the Secretary of State, despite the 2021 Housing Delivery Test indicating a need for a 20% buffer due to previous under-delivery of housing. It is therefore imperative that the Council identifies additional sites to increase the flexibility factor to ensure housing needs are met over the plan period.

Conclusion

- 2.18 In light of the above, we do not consider that the approach adopted to rebalancing the employment land and housing supply is sound or justified. If the SEWEA is deleted then it should be replaced with other allocations, and the housing requirement increased, rather than reducing the employment land requirement, and more sites for housing development should be identified instead to ensure a sufficient labour supply over the plan period, which can support the employment needs within the borough. The Government's objective of boosting housing delivery and striving to bring forward 300,000 dwellings per



annum in England is a key consideration and the as modified plan would not be in keeping with these aspirations.

Stepped housing requirement

- 2.19 We note that the housing requirement remains as initially drafted, requiring delivery of 678 dwellings per annum (dpa) to be delivered in the first 5 years of the plan period and 870 dpa for the remainder of the plan.
- 2.20 As outlined in our response to Question 8, Matter 4, this approach is not considered to be sound and fails to support the national objective of significantly boosting the supply of homes. The standard method calculation indicates that there is a real need to deliver 816 dpa to meet housing needs in Warrington. The Council is effectively planning to disregard the local housing need for the first 5 years of the plan, however needs such as affordable housing cannot be put on hold and will require consistent delivery of homes to address them.
- 2.21 Furthermore, through the examination the Council adduced evidence to indicate that the supply in years 1-5 was higher than originally envisioned. However, the Council has not proposed to increase the housing requirement in the first 5 year commensurately. The approach is inconsistent with the requirement to plan positively, and paragraph 68-021 of the PPG, which states that when planning for a stepped requirement, plan makers should not seek to unnecessarily delay meeting identified development needs.
- 2.22 It is crucial for the housing need to be met over the first 5 years given the uncertainty of delivery into the later years of the plan. This is further evidenced through the sharp decrease in supply in years 10-15 indicated in the amended housing trajectory at Appendix 2 of the Schedule of Proposed Modifications. We therefore consider that the correct response is for the supply of housing to be boosted in the first 5 years of the plan in order to meet housing need, and more sites should be allocated to support this.

Housing distribution

- 2.23 We note that no main modifications have been proposed to Policy DEV1 – Housing Delivery in respect of housing distribution and lack of allocations or safeguarded land within Burtonwood.
- 2.24 Whilst we do not wish to repeat our points raised in both the Regulation 19 Representations and in response to Matter 3, we still consider the distribution of development between the outlying settlement to be unjustified and therefore find it imperative to note the following:
- It is unreasonable to suggest that specifically the higher-growth options would undermine the regeneration of the Warrington Urban Area.



- It is not clear whether the settlements have been assessed to determine the individual needs and capacity, or what informed the decision not to pursue the higher-level growth options.
- It is not clear how the delivery of 1,000 dwellings would have supported the needs of the outlying settlements, including affordable housing, local infrastructure and environmental capacity. The lower housing delivery within outlying settlements as a result of removing the allocation for 160 dwellings in Burtonwood will further exacerbate the issues surrounding lack of support within these settlements.
- The distribution of growth and reasoning behind not pursuing a higher growth option is unjustified and the claims are not backed by evidence.
- The settlement guideline chosen as part of Option 2 was for a minimum of 1,00 dwellings, therefore more housing should be allocated to meet this need and exceedance of this should not be an issue as the guideline should not be utilised as cap on housing delivery.

2.25 The requirement for a minimum of 160 dwellings to be delivered within Burtonwood should therefore be reinstated, and allocations identified.

Safeguarded land

2.26 Further to our response to Matter 3, Question 27, it is still our view that there is a need to designate safeguarded land.

2.27 The Framework at paragraph 140 seeks to ensure that Green Belt boundaries can endure beyond the plan period. The mechanism which allows for this is set out at paragraph 143 and states:

“c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period”

2.28 The identification of safeguarded land is therefore a significant factor in ensuring compliance of a Local Plan with paragraph 140 of the Framework. It is illogical to seek to protect Green Belt land but not allocate any safeguarded land to ensure that it is not affected by shortfalls in future.

2.29 Therefore, in the absence of any safeguarded land allocations within the draft plan, should the 4% flexibility allowance within the plan prove to be insufficient, which it is very likely to be given the significant decrease in supply across the plan period, the only available option would be to carry out a plan review.





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