

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.

Questions

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

1. The HBF considers this is for the Council to determine.

2. 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

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

c) SHLAA sites without planning permission

d) Small site allowance (windfalls)

e) Each of the Main Development Areas involving housing

f) Each of the site allocations in outlying settlements

2. The Strategic Housing Land Availability Assessment (SHLAA) (2021) sets out the standard lead in times and build out rate assumptions.

3. The SHLAA also sets out the evidence for the small sites allowance, it highlights that an average of 90 dwellings have been completed on small sites over the last 10 years. Appendix 1 of the Local Plan sets out the Council's supply and trajectory. It includes small sites allowance of 81 dwellings each year.

4. It is not known if the Council has updated the information provided in the 2021 SHLAA or the Local Plan to ensure that it is still appropriate. The HBF would strongly recommend that the Council works closely with developers and the homebuilding industry to ensure that the rates of delivery reflect the realities of the sites included in the supply.

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

5. The Local Plan sets a housing requirement of 14,688 dwellings over the Plan period 2021 to 2038. Appendix 1 of the Local Plan sets out the Council's trajectory and overall housing supply. It suggests that there is a supply of 16,676 dwellings, including 4,891 on Green Belt release sites.

6. The HBF cannot determine whether the Local Plan would realistically deliver the number of homes required from the evidence provided by the Council at this time, as the HBF

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does not consider that there is sufficient evidence to determine that the supply is deliverable and developable as set out in the PPG¹ and NPPF².

4. 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)?

7. The HBF considers that it is important that at least 10% of the housing requirement is provided for on sites no larger than 1ha, this can help to provide a good mix of sites for a variety of developers. The HBF considers it is for the Council to demonstrate that this can be achieved or to identify the strong reasons why this cannot.

8. It is noted that the SHLAA and the Local Plan housing trajectory, both include a small sites allowance. However, the HBF does not consider that this would be consistent with the NPPF³ looking to promote a good mix of sites by identifying through the development plan land to accommodate housing on sites no larger than 1ha.

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

9. The NPPF⁴ states that the supply of specific deliverable sites should in addition include a buffer of 20% where there has been a significant under delivery of housing over the previous three years, this will be measured against the Housing Delivery test (HDT). Warrington had a HDT percentage of 72% in 2021 and as such shows a significant under delivery of housing and it is appropriate to apply the 20% buffer.

6. 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)?

10. The Council have not currently identified the housing completions for the 2021/22 and as such it is not currently possible to determine the five-year requirement. The HBF reserve the right to comment further on this issue once this information is made available.

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

11. The Council have not currently updated the five-year supply for 2022 and beyond and as such the HBF reserve the right to comment further on this issue once this information is made available.

12. The 2021 SHLAA identifies a five-year supply of 3,857 dwellings, this is made up of:
 - i. Large sites with planning permission 2,692
 - ii. Large sites without planning permission 715
 - iii. Small sites allowance 450

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

¹ PPG ID: 68-007-20190722

² NPPF 2021 Glossary

³ Paragraph 69 of the NPPF 2021

⁴ Paragraph 74 of the NPPF 2021

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13. The Council have not currently updated the five-year supply for 2022 and beyond and as such the HBF reserve the right to comment further on this issue once this information is made available. However, the HBF would expect the Council to ensure that they are able to demonstrate the deliverability of all sites included within the five-year supply in line with the information set out in the PPG⁵. This is particularly important for the sites that do not currently have planning permission.

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

14. The Council have not currently updated the five-year supply for 2022 and beyond and as such the HBF reserve the right to comment further on this issue once this information is made available. The HBF does not currently consider that sufficient evidence has been provided by the Council to determine whether the Local Plan would realistically provide for a five-year housing supply on adoption.

⁵ PPG ID: 68-007-20190722