

M. Quinn & T. Quinn,  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Planning Policy Team,  
Warrington Borough Council,  
New Town House,  
Buttermarket Street,  
Warrington,  
WA1 2NH.

11<sup>th</sup> June 2019

Dear Sir/Madam,

We are writing to respond to the consultation on the Warrington Local Plan – Proposed Submission Version.

As we understand it from the documentation supplied, the housing need identified up to 2037 is 945pa based on the methodology within “Local Housing Needs Assessment, 2019”, produced by planning consultants GL Hearn. There is also a land requirement identified of 362 Ha for employment purposes.

#### **Housing need calculation (from “Local Housing Needs Assessment, 2019”)**

In summary, this document appears to have been used to provide justification for the local plan as it currently stands rather than being a “ground up”, objective assessment of need based on the current evidence and assessments of population growth. Some of the specific issues are:-

- The new standard method for calculation of housing need has been ignored in favour of a method that provides a higher number. This contravenes the NPPF which states in Para 60 that “the standard method should be used unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals”.
  - There are no exceptional circumstances that justify any alternative approach.
  - The alternative approach taken is directly at odds with the latest demographic trends and market signals.
- Despite not being selected as the method to calculate housing need in the plan, the standard method has been used to provide a minimum figure. The method has been incorrectly interpreted by GL Hearn, giving a minimum annual housing need figure (909 hpa) that is significantly higher than if the method had been correctly applied (860hpa).
  - The baseline household growth projections have been calculated between 2017 and 2027 giving a base figure of 792 hpa, however the standard method requires that the *current* year (2019) should be used as the starting point. The household growth projections should therefore have been assessed between 2019 and 2029, giving a lower base figure of 751 hpa. Any under delivery of housing between 2017 and the current year will be accounted for within the affordability ratio adjustment so there is no need to back-date to the start date of the plan.
  - The workplace-based affordability ratio for Warrington is 6.32 for 2018, the latest figure available and therefore the affordability adjustment factor should be 1.145.
  - This gives:-  $751 \text{ hpa} \times 1.145 = 860 \text{ hpa}$ .

- The figure of 860 hpa, calculated using the specified method stands a better chance of being deliverable, another important factor in local plans.
- The LEP are still predicting an uplift of 319 jobs per annum despite the much lower overall forecasts for jobs created per year. This represents an increase of 50% over the current forecast job numbers from Oxford Economics and a 62% increase on the Cambridge Econometrics forecast. It is wholly unrealistic to expect the policies within the SEP to produce these increases and will hopefully be subjected to close scrutiny by experts during the current consultation and when the plan goes for inspection.
- Given the significantly downward trajectory of population growth and employment projections from reputable sources such as Oxford Economics and Cambridge Econometrics it would make sense to reduce the plan to the minimum required 15 years from 20 years. This would also make sense to allow the effects of Brexit and to become apparent and for new sources of brownfield land such as Fiddler's Ferry power station to become available. This would enable the growth to be managed in an incremental way that minimises loss of green space and maximises sustainable development in the right locations.
- Therefore a total housing need of (860 hpa x 15yr) 12,900 would be a deliverable plan that would mean that the green belt is protected and development can be targeted in the right areas.
- I am concerned with the selection of vested interests that have been employed to produce the evidence base for WBC. There are a few examples, just one is GL Hearn who have produced the housing needs calculation that supports green belt release. At the same time they also represent owners of green belt land who are putting forward that land for development, a direct conflict of interest. I hope this is again something that will be scrutinised closely as this does feel a little bit like putting the fox in charge of the hen house.

Further concerns with the local plan as currently proposed are:-

- There is very little support from the residents of Warrington over the New City ambitions of the council, particularly in South Warrington which is to be most affected by this plan. There were around 4,500 responses to the PDO proposals and the vast majority of these were against. Little seems to have changed with the current plan.
- If this plan were to be adopted, large areas of green belt land will be immediately released. In the event that the employment growth and housing need falls short of that anticipated, there will not be anything in place to obligate housebuilders to build on brownfield land in preference to released green belt sites.
- The likely effect of not having this protection is that the first choice for developers will be to build new homes and businesses on the more profitable greenfield sites on the outskirts of the town and in the outlying settlements, which do not have the infrastructure to support the new population. This is unsustainable development.
- It may also slow or prevent much needed and more sustainable development of brownfield sites both within the urban areas of Warrington and the neighbouring authorities.
- This is therefore a high risk plan that could leave the people of Warrington with all of the costs in terms of loss of green space, increased traffic congestion, environmental damage, pressure on services etc., with few or none of the economic benefits promised at the outset.

#### **Comments on Call for Sites R18/P2/106 – Land North of Higher Lane, Lymm**

We agree with the current local plan in not allocating this land for development and in would like to outline the many reasons why this land is an unsustainable site and unsuitable for development within this plan period and beyond:-

- This site performs the functions of green belt strongly. Development of this land would result in inevitable countryside sprawl.
- It is recognised that this part of Lymm has inadequate public transport provision. This will result in virtually all journeys from this site being made by car.
  - There are just 3 bus services per day in each direction between Knutsford and Warrington, none of these are in peak times. The nearest regular bus service between Altrincham and Warrington is a 1 mile walk away.
- The closest facilities such as shopping and other services are located in the village centre approximately 1 mile away. This will result in large numbers of car journeys for those that are able and elderly residents will have no access to the wider community.
- The two closest primary schools are around a mile away and are regularly over-subscribed. Any children of primary school age will therefore have to be driven to schools, adding to local traffic problems around schools.
- The nearest medical surgeries are around a mile away and already full to capacity.
- The site is crossed by the main pipeline between Stanlow Oil refinery and Carrington just a few feet below the surface. This is a Major Accident Hazard Pipeline and there are no housing estates clustered around this pipeline anywhere along it's route. This is for good reason.
- The site is immediately adjacent to Helsdale Wood and Newhay's PLantation, a designated local wildlife site and would result in the destruction of the hedgerows that form important wildlife corridors.
- This would result in the loss of agricultural land as the majority of the site is currently in use for agricultural purposes.
- In short this is an edge of town site that is not suitable for the high numbers of properties proposed.

Please can the above comments be reviewed and taken into account when preparing the submission version of the LocalPlan. We would also appreciate it if we could be given notification of the future stages in development of the plan. Thank you.

Yours Sincerely

M. Quinn & T. Quinn