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**Dr & Mrs R J Blackwell**



10th June 2019

**Warrington Borough Council**

Planning Policy and Programmes  
New Town House  
Buttermarket Street  
Warrington  
Cheshire  
WA1 2NH

Dear Sirs,

**Local Plan - Proposed Submission Version Consultation**

We are residents of Warrington and this letter is our representation on the Local Plan in accordance with Regulation 20 of The Town and Country Planning (Local Planning) (England) Regulations 2012. We wish to raise serious concerns with the Proposed Submission Local Plan, which must either be: addressed before the plan is submitted to the Secretary of State for Housing, Communities and Local Government or highlighted for examination in accordance with Regulations 22 and 23.

These concerns are, in summary:

- Inappropriate and unrealistic growth plans which do not reflect the views of residents as expressed in the Regulation 18 consultation
- Inadequate preservation of the landscape character
- Insufficient evidence to demonstrate exceptional circumstances for release of green belt
- Failure to adequately take into account representations made on the local plan under Regulation 18
- Failure to adequately consider lower growth alternatives in the Environmental Appraisal

Serious concerns were raised by a very significant number of residents, which should have resulted in a fundamental revision of the Local Plan

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Preferred Development Option. Although some minor changes were made in the Proposed Submission Version these changes are not sufficient to address the concerns raised.

Below we explain our concerns in more detail. We urge the council to take these concerns into account and completely revise the Local Plan.

### **Inappropriate and unrealistic growth plans**

The proposed development option (PDO) consultation highlighted a strategic objective W1: The transition of Warrington from a New Town to a New City. While strategic objective W1 has been re-titled in the proposed submission version, it is evident that the local plan is fundamentally shaped by the councils growth ambitions. It is equally evident that these growth ambitions are unrealistic and not supported by residents of Warrington. It is therefore inappropriate to adopt a local plan based on these growth ambitions.

Evidence that the proposed local plan is fundamentally shaped by the councils “new city” ambition is demonstrated with the following examples:

1. Paragraph 3.1.2 makes it clear that the council’s vision for development is based not only on Warrington’s future development needs but also the Council’s growth aspirations.
2. Paragraph 2.1.29 reveals that the council has a Warrington **City Centre Masterplan** - this master plan is absent from the consultation documents.
3. The Local Housing Needs Assessment (LHNA), included as supporting evidence, refers to “wider policy aspirations for the Warrington New City” (paragraph 3.27).
4. Page 85 of the Responding to Representations Report states: “The draft Local Plan reflects the Council’s growth aspirations, as set out in the Warrington Means Business Regeneration Framework, but specific references to Warrington New City have been removed from the Plan.”

The fourth example above highlights the issue in relation to consultation that I will return to below. However in the council’s words: “the overwhelming majority of responses from residents, community groups and Parish Councils expressed objection to the Plan having a vision that would promote Warrington’s transformation from a New Town to a ‘New City’”. Yet the council’s response is to retain the growth aspiration and seek to remove references to ‘new city’ from the plan. This is clearly missing the point that residents, including ourselves, do not support the council’s growth aspiration.

The housing growth aspirations are also unrealistic, as they are in excess of robust and up to date independent forecasts. Strategic policy W1 targets

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a minimum of 18,900 new homes (equating to 945 per year) between 2017 and 2037.

The NPPF sets an expectation that the “standard method” should be used to forecast housing needs, and authorities can expect alternative approaches to be closely scrutinised at examination. Paragraph 2.11 of the LHA stated that the “standard method” results in 909 homes per year, which equates to 18,180.

While use of the standard method is not mandatory there is an expectation that any other method will be used only in exceptional circumstances. Now we should consider whether exceptional circumstances exist in Warrington’s case. It’s clear from representation that high levels of growth are not supported by residents and it’s also clear that high levels of growth result in a proposed plan with release of green belt which does not maintain landscape character. Therefore exceptional circumstances point to the need to consider lower growth than the standard method, rather than higher growth.

Where an alternative approach (which would include use of 2016 based projections) results in a lower housing need figure than that identified using the standard method, the authority should demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. Warrington council has not sought to do this, but there is clearly a case to be made.

The Development Options and Site Assessment Technical Report sets out a lower growth scenario based on the standard methodology using 2016 based projections. This has a significantly lower forecast of 735 per annum, total 14,700 over the plan period. Although use of the 2016 based projections is a departure from Government guidance it is based on the most up to date set of data for birth rate, life expectancy, migration and household formation. It would appear that government guidance in this regard is unsound. More up to date evidence should not be ignored in the planning process.

Housing need can also be predicted using economic growth projections, as shown in Section 3 of the LHNA. Oxford Economics’ 2018 forecasts show that 635 new jobs per annum will be created in Warrington for 2017-37. Cambridge Economics’ 2018 forecasts are lower at 516 new jobs per annum. Instead of using these independent forecasts, the proposed plan uses a higher projection of 954 jobs per annum. It translates this (using 2014 based housing data) into a requirement for 907 new homes per annum. This is similar to the 2014 based standard method projection of 909. However, the independent forecasts from Oxford Economics and Cambridge Economics are 33% and 46% percent lower. This would translate into a need between 490 and 607 new homes per annum.

Another way of considering housing need is to look directly at population projections. The latest (2016 based) ONS projections for Warrington are for a population of 225,600 in 2037. This contrasts with Table 57 of the LHNA which shows that 909 new homes per annum would allow for a population of 238,287; that is 12,687 more people than are expected to be living in the borough. The plan allows for even higher growth: 945 new homes per annum and a population of 240,050 (paragraph 3.59). As a growth between 2017 and 2037, this is 7.4% from the ONS, 13.6% from the standard method and 14.5% in the proposed local plan. It is remarkable that the proposed local plan is based on a housing need almost double that which ONS population projections would imply.

The ONS population projections would imply a housing need of 9,646 over the plan period or 482 per annum.

The longer term forecast using the 2014 projections is also noted in the Development Options and Site Assessment Technical Report (paragraph 7.6). This is stated to be 617 per annum. If this rate was also applied within the plan period it would imply a total requirement of 12,340.

These different forecasts are summarised in Table 1 below:

<b>Method</b>	<b>Annual requirement</b>	<b>Requirement to 2037</b>
Proposed local plan	945	18,900
Standard method (2014 based)	909	18,180
Standard method (2016 based)	735	14,700
Longer term 2014 based projections	617	12,340
Oxford Economics	607	12,140
Cambridge Economics	490	9,800
ONS population based	482	9,640

**Table 1. Estimates of housing need**

Up to date and independent forecasts are all lower than the 2014 standard method. This clearly shows that there is no “exceptional circumstances” which demonstrate a need for the local plan to adopt a higher forecast than the standard method. On the contrary, it suggests that there may be exceptional circumstances to adopt a lower forecast than the 2014 based standard method. Even the 2016 based standard method would allow for a

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significant buffer in the plan for housing growth to exceed that based on independent economic forecasts.

Similar issues arise in the assessment of employment land needed. The Economic Development Needs Assessment Update February 2019 indicates a “strategic need” for 277.8 hectares. However an employment based model from Oxford Economics Model predicts between 8.1 and 42.9 hectares based on local need. The proposed local plan provides 362 hectares.

In summary, it is clear that the growth assumptions in this plan are based on inappropriate and unrealistic growth aspirations of Warrington Borough Council. These growth aspirations are not supported by the evidence or the residents of the borough.

### **Inadequate preservation of the landscape character**

The Borough of Warrington sits between two city regions: Liverpool and Manchester. The council’s own Landscape Character Assessment (2007) states that the town of Warrington “is located centrally within the Borough and is surrounded by small village settlements and open countryside.” It also states that “Warrington sits in an agricultural landscape of great variety”. This landscape character, i.e. town, villages and open countryside, is of the utmost importance to us as residents and, we are sure, of many others. It is evident that the proposed local plan dominated by a growth aspiration is inconsistent with preservation of this landscape character. For instance release of significant green belt will destroy the village, open countryside and agricultural character of South Warrington.

The National Planning Policy Framework (NPPF) 2019, paragraph 20(d) makes clear that conservation and enhancement of landscapes should be a strategic policy. This has clearly not been adequately addressed in the local plan. While the NPPF makes clear that plans should support growth, growth beyond “sufficient provision” for housing, employment etc. is not included in the list of strategic priorities for development plans in paragraph 20. The United Kingdom is also signatory to the European Landscape Convention which requires policy instruments aimed at protecting, managing and/or planning the landscape. It is clear that the UK’s policy framework places a higher priority on landscape protection than aspirational growth and that this has not been reflected in the proposed local plan.

Strategic Policy W1, the retitled “new city” policy, targets a given level of growth. As noted above, this is not required under the NPPF. Furthermore The Landscape Character Assessment should form part of the evidence base for the preparation of Development Plan Documents. However in the Local Plan there is insufficient consideration to the impact that the adoption of W1 would have on the preservation of this landscape character. W1

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implies a significant change of landscape character of South Warrington from town, villages and open countryside to an urban city landscape.

### **Insufficient evidence to demonstrate exceptional circumstances for release of green belt**

According to the National Policy Planning Framework 2019 (NPPF), there are five stated purposes of including land within the green belt:

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns from merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The NPPF also states that Green Belt boundaries should only be changed in a Local Plan under “exceptional circumstances” and only permits most forms of development in “very special circumstances”.

Table 6 of the proposed local plan shows that there is an additional 64 hectares of employment land that can be made available, on top of the existing supply of 84 hectares, before recourse to the green belt. As noted above, the Oxford Economics Model predicts between a need of between 8.1 and 42.9 hectares.

Proposed Policy DEV1 identifies capacity for a minimum of 13,726 new homes in the existing main urban area of Warrington, the existing inset settlements and other sites identified in the Council’s Strategic Housing Land Availability Assessment (SHLAA). This is greater than the three independent estimates shown in Table 1 above.

This shows that by using independent forecasts Warrington’s need for new homes and employment land can be met without using the Green Belt. The underlying needs of the borough do not require release of green belt. The evidence shows that in the proposed Local Plan, green belt is only needed to meet the council’s growth aspirations (a new city).

The council growth aspiration does not constitute “exceptional circumstances”. No evidence is presented in the Local Plan which shows “exceptional circumstances”. Indeed, under the NPPF it is clear that the purpose of the green belt is to prevent the kind of development proposed in the local plan. The strategic importance of the Green Belt has been ignored in the plan, and loss of such a significant amount of open space will be detrimental to the whole borough and neighboring areas.

Under Section 19 of the Planning and Compulsory Purchase Act 2004 the Local Plan must take account of government policy including the NPPF.

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Paragraph 151 of the NPPF states that “Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework.” By proposing development in existing green belt without evidence of “exceptional circumstances” the council has not complied with this legislation.

We are aware that the Council could form an argument that release of the Green Belt is needed to comply with the NPPF standard methodology for housing need. Our view is that lower independent forecasts, protection of the landscape character and protection of the Green Belt taken together would constitute “exceptional circumstances” to deviate from the standard method. Once land is released from the Green Belt it could be used for development in preference to the urban areas, even if the higher level of growth in the proposed plan did not arise. This would not constitute sustainable development.

The standard method using the most up to date (2016) projections may also be considered. It would give a significant buffer over the independent forecasts. This gives a housing need of 14,700 versus a minimum capacity of 13,726. The shortfall here is 974 homes, approximately 16 months supply which would arise at the end of the 20 year planning horizon. The council could consider a number of options to accommodate this in the plan without requiring release of substantial parts of the Green Belt and a significant change to the landscape character. Options include:

- Increasing the density of proposed development within the SHLAA, Waterfront and wider Town Centre Masterplan areas above the proposed 50dph. For example in the proposed plan the Waterfront has 993 dwellings at 50 dph. Doubling the density in this one area alone to 100 dph would yield sufficient capacity to overcome the shortfall noted. There are many variations that could be explored and 100 dph can be an attractive form of development in urban areas e.g. traditional terrace housing or more modern alternatives (for example the Borneo and Sporenburg waterfront development in the Netherlands).
- Limited release of Green Belt in the 2030’s for an urban extension to the south west of the main urban area
- Limited release of Green Belt in the 2030’s for ‘incremental growth’ across the outlying settlements

Limited release of Green belt later in the planning horizon would bring two benefits. Firstly the need could be confirmed in a review of the Local Plan before the land is released. Secondly the two options are most likely to retain the landscape character of Warrington as town, villages and open countryside.

## Failure to adequately take into account representations

Under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (3) the local planning authority must take into account representations when in preparing the local plan.

In representations serious concerns were raised by a very significant number of residents, including ourselves. The Responding to Representations Report summarises the representations made and the Warrington Council's response. The report notes widespread public concerns, including with regard to:

- the level of growth proposed
- the concept of Warrington becoming a 'city'.
- planning for more homes than the minimum the Council is required to
- scale of development, loss of Green Belt / countryside and impact on the character of the area

The report also notes that a large number of public representations considered that residential densities should be increased to reduce the amount of required Green Belt release.

Around 4,500 responses were received to the Preferred Development Option (PDO) consultation. A petition was also submitted objecting to the proposals in the Preferred Development Option which was signed by over 4,000 people. This is a very high response rate given that the Royal Town Planning Institute notes response rates for Local Plans can be less than 1% of the population.

The scale of response and the strength of concerns with the PDO should have resulted in a fundamental revision of the Local Plan. Although some minor changes were made in the Proposed Submission Version these changes are not sufficient to address the concerns raised.

	<b>Preferred Development Option</b>	<b>Proposed Submission Version</b>	<b>Change</b>
Housing growth, p.a.	1,113	945	15% reduction
Employment land target (ha)	381	362	5% reduction
Green Belt release (ha)	8,791	7,064	20% reduction
Capacity within	15,429	13,726	11% reduction

urban area (dwellings)			
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The table above shows modest changes in the growth, employment land and Green Belt releases between the PDO and the proposed submission version. These changes do not seem sufficient in light of the scale of concern raised in consultation. Even more surprisingly, the capacity for new homes within the urban area has reduced, when taking account of representations made it should have increased by allowing for greater residential areas.

It's also clear that the council retain a "new city" aspiration despite the majority of references to it being removed from the plan.

### **Failure to adequately consider lower growth alternatives in the Environmental Appraisal**

A sustainability appraisal has been prepared to demonstrate compliance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. Under Regulation 12(2b) the report shall identify, describe and evaluate the likely significant effects on the environment of reasonable alternatives.

Overall the sustainability appraisal shows that there are likely significant adverse effects on Natural Resources and Landscape, as well as negative effects on Health & Wellbeing, Accessibility, Historic Environment, Biodiversity and Geodiversity, Climate change and Resource use (section 9.14 of the sustainability appraisal report). The appraisal does not show the likely significant effects of a range of lower growth scenarios equivalent to any of those shown in Table 1 of this letter.

A scenario using 2016-based housing projections is identified as Scenario D in the sustainability appraisal, and given a focus on development in the urban area (D1) shows the overall lowest negative effects (page 234 of the Sustainability Report). However Scenario D seems to be dismissed as it does not get mentioned in text headed "Comparison of alternatives" on page 235. It erroneously states that "growth scenario E would have the fewest negative effects".

In the Proposed Submission Version Local Plan there appears to be no discussion of the Sustainability Appraisal of a lower growth scenario when proposing policies relating to the growth target. This is contrary to the purpose of a Strategic Environmental Assessment. European Commission Guidance<sup>1</sup> states that: "The obligation to identify, describe and evaluate reasonable alternatives must be read in the context of the objective of the

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<sup>1</sup>See paragraph 5.11 of [http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf)

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Directive which is to ensure that the effects of implementing plans and programmes are taken into account during their preparation and before their adoption.” The assessment of alternatives is a critical aspect of SEA and a frequent basis of legal challenge. It appears that Warrington’s local plan does not meet the requirements for this.

### **Concluding remarks**

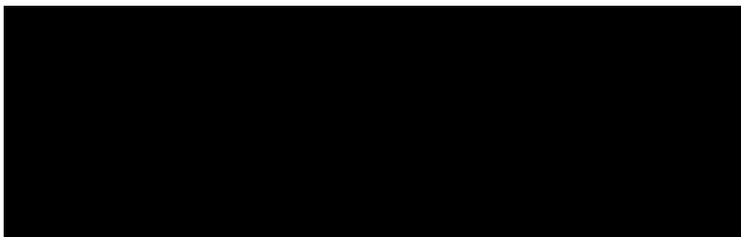
The Local Plan has significant flaws which require fundamental revision and re-consultation before the plan is taken forwards. Whilst revisions to adopt much lower growth forecasts and avoid the need for significant release of Green Belt should have been made following the PDO consultation we hope that the council will take the opportunity to make changes before submission. If changes are not made, we are sure that the Planning Inspector will wish to consider these matters in some detail during the Examination in Public.

We urge the council to prepare a revised Local Plan which drops the growth ambitions and release of green belt, adopting instead a strategic objective to preserve the local landscape character.

We would support a Local Plan with development in the town centre and waterfront areas, which with modest development in the wider urban area should be more than adequate to meet the local needs. We cannot support an unsound plan which continues to include the Garden City proposal which would destroy the open countryside character of South East Warrington.

In light of the serious concerns we have raised, we are sending a copy of this representation to the Secretary of State for Communities and Local Government and to the Member of Parliament for Warrington South. Please acknowledge receipt of this representation.

Sincerely,

A large black rectangular redaction box covering the signature area.

**Dr & Mrs R J Blackwell**