



Groves Town

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Warrington Local Plan Examination in Public	
Representor/Number	South Warrington Parishes/0450
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Site	Whole Plan

1. The SWP are grateful for the opportunity to respond to CD10 and 10a which provide the employment jobs figure which the Local Plan's employment allocation would support
2. This links into the points that the SWP raised in relation to Matter 4 and Matter 5 – namely that the entirety of this Plan is predicated on facilitating and being justified by unrealistic and unachievable economic growth. This makes the Plan unsound and unsustainable.
3. A point raised by the SWP to illustrate this (during the Matter 5 Session) was that the Plan had chosen the highest modelled figure for their employment land requirements (as shown by Table ES1 on page 5 of the EDNA) which is referred to as meeting strategic and local need.
4. However that figure – requiring a shortfall of 277ha to be found – was far above the figures based on the Oxford or Cambridge growth figures (even when adjusted to take

account of the 'unachievable' SEP Target) which were between a 78 to 81 shortfall.

5. The final important element of context is that the Plan is releasing significant amounts of Green Belt (E.G the SEWEA of 137 hec) to meet this purported strategic and local need – but they are therefore required to show exceptional circumstances which is fully evidenced and justified (per 140 and 141c of the NPPF).
6. The SWP's submission was that there was no evidence before the inquiry that the level of employment land was required, fully evidenced or justified.
7. This further information confirms and illustrates the SWP's point on the Council's own evidence.
8. The relevant figure for total jobs growth required to support this employment land release is 33,368 (per 1.9 of CD10a) of which 31,068 comes from the level of employment land being allocated (per Table 2 of CD10a).

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9. This is in stark contrast to the mid-point the Council chose for their Local Housing Needs Assessment (14,855), the most optimistic figure of Cambridge Econometric (17,319) and even the figure of jobs growth which the proposed housing will facilitate (18,300).
10. The point being that this new work is further evidence that the Plan significantly over delivers on employment land in an unachievable fashion. This is unsound. Further – given the significant release of Green Belt required to meet it – it is unsustainable because an unachievable economic objective is being pursued to the detriment of the social and environmental objective.
11. Therefore this is further evidence that the Plan is unsound and unsustainable.
12. It is important to note a final point – which was recognised by the SWP in the exam hearing for Matter 4. It could be the case that other parties rely on this evidence to argue that the level of housing provision should be increased – i.e. to provide the jobs to support the employment land distribution. But while that is theoretically correct it cannot

be done in practice because of the substantial evidence before the inquiry that any provision of homes over the current figure would be undeliverable (and thus why the Council moved away from this in a previous version of the Plan). The vast increase in housing would be required to provide the additional 15,068 jobs which not achievable or realistic.

13. The SWP would continue to submit that the housing figure should be even lower but recognises this is not a point arising from this document and appreciates the Inspectors will have a note of the SWP's submissions on this point.