



Groves Town

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Warrington Local Plan Examination	
Representor/Number	South Warrington Parish Councils
Document Title	Additional Hearing Statement – Matter 5 Economic Growth and Development
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1 Introduction

- 1.1 Groves Town Planning has again been appointed to make representations to the examination into the soundness of the Warrington Local Plan on behalf of the South Warrington Parish Council's Local Plan Working Group. (SWP).
- 1.2 My client's would expect the Inspectors to be made aware of the increasing confusion of the residents of Warrington which they represent as to function, fairness and transparency of the planning system.
- 1.3 The Borough Council and others have now spent nearly six years in the evolution of the Local Plan. Land owners and prospective developers have been provided with copious opportunities to present their cases and related evidence in support proposals and prospective allocations, including the hearing sessions before the Inspectors in 2022.

- 1.4 SWP has gone to considerable and in some respects exceptional lengths to ensure that a local perspective is prevented, in a context where it believes that the Council has taken a myopic stance, based on growth at all costs without justification and clarity over the balancing exercise needed to deliver sustainable development against each of the objectives noted in the NPPF
- 1.5 Numerous parties will have accepted that process has in some cases accommodated preferred outcomes and in other cases has gone against those preferences. Accepting that just because their preferred outcomes have not been secured does not create scope for extensive re-examination and presentation of copious additional evidence which they and their representatives have previously omitted to present in representations or submissions to the Examination.

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1.6 The Council itself has given a mandate to accept the major modifications coming from the Inspectors' letter of December 2022. It was clearly open to the Council not to proceed to consultation on those major modifications, if they their legal advisors and specialist consultants – BE Group concluded that those modifications were not soundly based and gave rise to the fundamental questions of soundness which are now being presented.

1.7 The Council would have been aware of the provisions of NPPG 61-050-20190315 and clearly accepted the legitimacy of the suggested modifications recommended by Inspectors because they were needed to achieve a sound plan.

1.8 To the public view this is made all the more curious when the key challenge to the major modifications document is a long standing collaborator with the Council on matters relating to economic growth and development. (See representation on

behalf of Langtree to consultation on Proposed Main Modifications). Langtree operated as Joint Venture Partners with Warrington on sites within the Borough, sits on the Cheshire and Warrington LEP which has been heavily influential in the content of the Warrington Economic Needs Assessment and previously as a board member of Warrington and Co, the development arm of the Council.

2 Key issues

2.1 The SWP would highlight a number of key issues of relevance to this additional examination. These are in addition and supplementary to concerns previously raised in their original matters statement on this issue. (Section 2 Matters statement July 2022).

2.2 The following areas are addressed

- Consistency with National Planning Practice

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- The need to take a balanced position over alternative methods of assessing employment need
- Consistency with the objectives of sustainable development
- Understanding local circumstances

3 Consistency with National Planning Practice

3.1 SWP has consistently raised issue over the quality of the evidence base used by the Council to establish levels of employment land requirements and the need for allocations for employment use.

3.2 Paragraph 040 Reference ID: 61-040-20190315 of National Planning Practice Guidance considers evidence collection.

Three key areas are noted –

- working together with county and neighbouring authorities, Mayors, combined authorities and with Local Enterprise

Partnerships to define the most appropriate geography to prepare policies for employment;

- preparing and maintaining a robust evidence base to understand both existing business needs and likely changes in the market, with reference to local industrial strategies where relevant; and
- engaging with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.

3.3 Previous presentation has question the degree to which the submission versions of the Local Plan could ever have been considered robust when focused on trends across periods where market conditions and the characteristics of operation within different employment sectors had experience such fluctuation and change.

3.4 It has been a consistent criticism made by SWP that the origins of the Local Plan saw WBC led by the Strategic Economic Plan produced by the Cheshire and Warrington LEP and in turn the Warrington Means Business – Development Strategy were entirely growth focused, often driven by the commercial sector and consequently presenting hugely ambitious and aspirational employment development requirements. Growth almost entirely reflected the fact that Warrington’s advantageous location of the motorway network created an insatiable appetite to locate logistics based development within the motorway corridors which circle the town.

3.5 SWP have previously presented the argument that whilst the strategic location of Warrington means that such levels of growth are not entirely unrealistic in terms of commercial demand, they are totally out of sync with any of the tools

presented during the preparation of the plan, which would look to much more appropriate levels of growth for a town of the size and character of Warrington.

3.6 It is considered that the information presented through representations and statements to the examination, although considerable in length and detail were not balanced and presented the Inspectors with a one sided perspective of the Borough’s employment land requirements.

3.7 This was inconsistent with the NPPG and understandably necessitated the Inspectors’ challenge of such an approach, entitling the view that a more robust and balanced analysis required the proposals outlined in the main modifications to ensure the soundness of the plan.

4 Assessing Need

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4.1 The complexity of assessing employment land requirements is amply illustrated by the content of the section of NPPG focusing on Housing and Economic Needs Assessment.

4.2 Those raising issue with the Inspectors' findings and the suggested main modifications seek to paint a simplistic approach of simply reviewing past trends and translating those into future needs.

4.3 It is contended that the guidance in no way advocates or supports this approve. Rather it presents multiple approaches – none of which in themselves produce definitive responses, but each providing information to form a robust evidence base to which planning judgement can be applied.

4.4 The evidence base provided to the 2022 examination into the Warrington Local Plan provided information gathered over at least six years and scrutinised by sector leading consultants and experts. Whilst, hugely complex, it is absolutely clear

that the Inspectors were provided with evidence setting out a complete range of issues and options needed to assess the employment land requirement for Warrington. If these submissions were in some way lacking and failed to produce the required evidence – necessitating a fresh attempt to provide new material – fault rests only with those presenting their cases.

4.5 There is no element of NPPG on this topic which identifies a single methodology or approach to assessing the quantum of housing need. If approaches are flawed it is in terms of the pretence that there is a sound arithmetic methodology which will provide a definitive accurate and reliable approach.

4.6 The NNPG is not policy. The NPPG is not consulted upon, unlike the NPPF and Development Plan policies. It is subject to no external scrutiny, again unlike the NPPF, let alone a Development Plan. It can, and sometimes does, change

without any forewarning. The NPPG is not drafted for or by lawyers, and there is no public system for checking for inconsistencies or tensions between paragraphs. It is intended, as its name suggests, to be guidance not policy. The approach suggested is not mandatory or a definitive statement of Government Policy.

4.7 Further caution may arise from the fact that current guidance derives from 2019 – pre- Brexit and pre-covid.

5 The application to wider planning policy

5.1 It is accepted that weight should be given to NPPG, but the guidance provided must be applied in a context of the policy established in the NPPF.

5.2 Paragraph 1 of the NPPF is clear that the Framework sets out the Governments Planning Policies. Paragraph 3 requires the Framework to be read as a whole.

5.3 The debate presented by others in the context of representations to the proposed main modifications seems to largely ignore the provisions of the NPPF particularly paragraph 7.

“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”.

5.4 The Framework then goes on at paragraph 8 to note the three overarching objectives for the planning system in terms of achieving sustainable development. It is clearly a critical part of national planning policy that the three objectives are not viewed in isolation but as interdependent and pursued in mutually supportive ways.

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- 5.5 It is the SWP's contention that the approach advocated in submissions by those critical of the Inspectors main modifications are fundamentally flawed in failing to have regard to the multi-faceted approach to securing sustainable development required by the NPPF.
- 5.6 The Inspectors' have correctly taken account of the range of methods available to assess development land needs for both housing and employment. This has clearly included assessment of past trends and the market conditions applicable to Warrington's unique location.
- 5.7 It is appropriate to assess how the release of land for employment related development secures the economic limb of securing sustainable development.
- 5.8 It is clear that response to market forces will have some positive impact on the local economy, although previous planning decisions – Liberty and Stobart, have perhaps

brought into question the exact extent of that impact, but whether this the right land, in the right place available at the right time to provide economic development has proved to be questionable.

- 5.9 It is apparent that in many cases new logistics based development relates to existing activity and is simply relocating that activity into larger units with greater ability to operate with state of the art equipment, greater automation, economies of scale and operational efficiency. Economic activity shifts and is consolidated rather than created.
- 5.10 Employment development must be linked to the provision of housing and wider social infrastructure if social objectives of strong, vibrant and healthy communities are to be secured.
- 5.11 If the cost of meeting demand/need for economic development means that there is disproportionate need for new housing development and questions over the delivery of

social infrastructure to accommodate that expanded housing demand – it is logical to question – as the Local Plan

Inspectors have done how that inaction works.

5.12 It is entirely correct to raise issue over the relationship of the release of land for additional economic activity with those parts of the Borough which are identified as having the highest levels of deprivation and social well being. SWP has consistently raised issue over the benefits of excessive levels of economic development, inevitably requiring Green Belt release, physically and practically disconnected from those parts of the population of Warrington and the wider region which might see social benefit and increased wellbeing as a consequence of development.

5.13 In this context the precise nature of the reasons behind high levels of deprivation, largely within the inner wards of

Warrington is not about employment, but about physical and mental health, education and wellbeing.

5.14 Prospective developers naively present their proposals for economic development and employment opportunities as a panacea to solve inequalities across the Borough. This is not the case and represents a continued lack of understanding about how Warrington functions – which it is not Wakefield or St Helens, and that standardised approaches and blinkered methodologies should not be applied.

5.15 The approach which has consistently been adopted by SWP relates to the desire to secure development which truly delivers the stated aspirations of the Council in reducing inequalities across the Borough. Without the major modifications suggested the plan will not meet this objective and will fail to secure sustainable development in the context of the NPPF

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- 5.16 Again, the Inspectors have correctly looked beyond arguments based on trends to consider the issue of employment land in a broader context as advocated by the NPPF.
- 5.17 The need to release Green Belt to secure the aspirations of those seeking to increase the release of land for employment allocation would directly contravene the stated expectations of the environmental objective of sustainable development advocated in paragraph 8 of the Framework.
- 5.18 Views expressed by those advocating that the adoption of the major modifications proposed would result in a plan which is not sound. The submission version of the plan resulted in the inevitable need to release large areas of green field site, land which of a best and most versatile agricultural value, harming landscape and visual amenity and located in the Green Belt. Such an approach would contravene numerous

parts of the Framework and the document when considered as a whole. Critically, the approach advocated – to abandon the modifications would result in contradiction of the environmental objectives for sustainable development. The plan would be unsound on that basis.

- 5.19 It is again apparent that the Inspectors have not simply taken assessment of the need to allocate land for employment use in isolation from the environmental objectives presented in NPPF paragraph 8, but have applied Government policy in the holistic approach required by NPPF paragraph 7.

6 Local Circumstances

- 6.1 There would appear to be considerable consensus that demand for employment land – principally for logistics related development would be insatiable if left to the market.

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- 6.2 There is consequently considerable risk to both Warrington and the wider regional economy if land allocations for future development are simplistically based on demand and market trends.
- 6.3 There is clear evidence that the stance adopted by both Liberty and Langtree in planning applications relating to land in South Warrington that developers would expect to readily secure take up of the largest of logistics based accommodation.
- 6.4 Historic trends in take up of B8 have been heavily influenced by inconsistent patterns of land release. This has often reflected changes in infrastructure provision.
- 6.5 Review of the Council's planning records will show outline planning permission dating from the early 2000's – 2003/01449. Amongst other matters the planning permission

was subject to conditional controls and a planning obligation requiring £10.75m of developer contributions.

- 6.6 The timing of development was also constrained by development agreements between the New Towns Permission and later English Partnerships, the Council, the Highways Agency, now Highways England and the Joint Venture Company formed to develop the site.
- 6.7 Development partners were obligated to provide major new elements of infrastructure, including a new roundabout on Burtonwood Road north of junction 8 on the M62 and the access road to Omega North – now Lockheed Road. This raised issues in terms of the JV having to secure funding for this infrastructure in advance of any return from development.
- 6.8 A range of applications to vary conditions relating to phasing of development and triggers to put required infrastructure in

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place were presented to find mechanisms where committed development could support the funding of infrastructure.

6.9 Agreements between WBC and EP, and decisions to commit land within the Omega estate previously reserved for employment development for residential use sought to limit the risk of frontloading the cost of infrastructure provision.

6.10 Together these constraints took time to resolve and for development to come forward. As a consequence large areas of the Omega site came forward to the market in a short space of time.

6.11 Demand for development has consequently resulted in a concentrated period of development across Omega but particularly relating to Omega North.

6.12 Local and changing circumstances must also reflect that opportunity to utilise the former Fiddler's Ferry Power Station site has become clearer as the Local Plan has emerged.

6.13 As a previously developed site mostly outside the Green Belt scope to bring such an area for development takes priority over any development which requires the release of land from the Green Belt.

6.14 The allocation of alternative green field sites creates a potential for the regeneration benefits of the use of a previously developed site to be lost.

6.15 The Fiddlers Ferry site has been portrayed by those promoting development elsewhere as difficult to develop and remote from the motorways network.

6.16 Plans are already with the Council relating to initial phases of development, including the anticipated demolition of cooling towers by the end of 2023.

6.17 The site has ready access to the A562 and then onto the A557 which provides access via high standard routes to junction 7 of the M62 and junction 12 of the M56. Critically,

the site already has rail access and is close to existing rail freight transfer facilities at Ditton.

7 Conclusions

7.1 SWP's position remains unchanged to that expressed in response to consultation on the two submission versions of the plan, or the position previously presented in matters statements to the Local Plan Examination.

7.2 There remains considerable scope to challenge the basis for expected levels of growth presented in the plan. These levels are overly aspirational and focus only on market demand and ignore wider planning considerations.

7.3 It is clear that it was and is open to the Inspectors to consider a range of methodologies in assessing overall land allocations necessary to make the plan sound. It has always been the position of SWP that the blinkered allocation of land for

development based purely on historic trends is itself flawed and gives rise to the question of soundness.

7.4 Conclusions as to the appropriate scale of allocations should not take account of economic factors alone. The provisions of the plan must result in the delivery of sustainable development in line with the policy position of the NPPF. The plan must take account of the broader social and environmental objectives of the Framework in order to be considered as sound.

7.5 Critically two points should not be lost sight of in the further examination hearing which will be focusing on employment land. Firstly for the plan to be sustainable it must be balanced with the social and environmental objectives of the Framework. Having an employment land allocation on Green Belt land which is far in excess of the jobs that could be

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supported by the allocated housing is contrary to the social and environmental objectives. It is inherently unsustainable.

7.6 Secondly – the allocation at the centre of the further examination hearing is a large Green Belt allocation. This imposes the higher bar of ‘exceptional circumstances’ which must be fully evidenced and justified (NPPF 140 and 141 c). The Inspector’s rightly concluded that the previous evidence before the inquiry was speculative and a product of a highly ambitious – and unsustainable – economic growth objectives. It rightly fell below the exceptional circumstances bar. The further evidence provided by developers does not provide any further clarity or certainty – and it does not challenge the other conclusions in relation to housing. The Local Plan must be balanced between the NPPF’s three objectives to be sustainable – and to reverse the ‘employment’ main modification would make it unsustainably focused on an economic objective. This would

not only make the Plan unsound, but also unlawful under s.39 of Planning and Compulsory Purchase Act 2004.

7.7 The main modifications on which the Council has agreed to consult are considered to achieve the necessary balance approach necessary to support the soundness of the plan.

7.8 Local, Warrington specific circumstances must be taken into account when making judgements about need and demand. The Borough is unique and patterns of historic patterns of development and growth need to be taken into account

7.9 The modifications tabled in December 2022 must stand in order for the plan to be considered sound in terms of the NPPF.

APPENDIX 1

Previously submitted matters statement

1 Introduction

1.1 Groves Town Planning has been engaged to represent the South Warrington Parish Council's Local Plan Working Group (SWP) since April 2018 at which time the Preferred Development Option of the Council had been published.

2 Key areas of concern

2.1 The Borough Council published an Economic Development Needs Assessment Update produced by Mickledore and BE Group in February 2019. A refresh of this documentation has been produced in by BE Group in August 2021. It is of concern that the August 2021 refresh considered the 2019

version of the NPPF despite that being superseded by the July 2021 NPPF at the time of its publication.

2.2 It is noted that most of the background papers for the PSV21 were produced simultaneously in August and September 2021 – days before the publication of the PSV for the WBC Cabinet meeting on 13 September 2021. The degree to which the EDNA has been properly taken into account in the production of other documents in the evidence base must be questioned.

2.3 It is noticeable that the Cheshire and Warrington LEP Strategic Economic Plan is less prominently referenced than in PSV2019. The SWP welcomes this approach in the light of previous criticism by SWP that the SEP was excessively aspirational, promotional and increasingly unsupported as economic and social/political context has dramatically changed.

2.4 It is clear however that the assessment still relies on a growth scenario based on the assumption that ambitious development plans and allocations will of themselves generate economic activity.

2.5 Critically for Warrington the Assessment amongst other issues highlights the following:

- The strong connections between economic activity in Warrington and activity in neighbouring areas, notably Cheshire East and Cheshire West, Greater Manchester and Liverpool, highlighting development identified in the Greater Manchester Spatial Framework and the potential needs of the Port of Liverpool.
- How growth in Warrington is predicated by competition for a share of the wider economic development across the region.

- Competition for growth based on the Science and professional sectors in Halton, Cheshire and Manchester.
- Dependence on historic high levels of take up of employment land
- The continued reference to the LEP Strategic Economic Plan Jobs Growth Scenario in predicting growth.
- Logistics land requirements driven by proximity to motorway junctions.
- Variation in forecasts from alternative providers and disregard of options based on those forecasts. Some appraisals prior to the production of the Preferred Developments Option in 2017 were suggesting growth levels of between 15% and 20% assessing patterns in GVA growth against the aspirations of the Local Enterprise Partnership (LEP) Strategic Economic Plan.

2.6 The SWP remains concerned that the approach taken to the consideration of growth is unreliable and unrealistic. It is acknowledged as being underpinned by the unsubstantiated and business driven expectations of the LEP Strategic Economic Plan (SEP). This body is not democratically accountable and is led by business interests with direct involvement in land released for development on back of the Needs Assessment. This concern is reinforced by the evidence of different assessments with different conclusions as to levels of growth produced.

2.7 7.7 This position is repeated with the evidence base for the 2021 PSV with two assessments producing two different forecasts for jobs growth. Irrespective of this position these forecasts are dismissed in the EDNA on the back of predictions based on historic growth rates and take up of employment.

2.8 It remains the contention of SWP that this approach is fundamentally flawed. Warrington has inevitably experienced, inflated, higher than average rates of growth in this regard as result of being able to deliver shovel ready development land at Birchwood and latterly Omega. This has attracted development to Warrington and away from other locations simply on the basis of availability. It is not just Warrington's strategically beneficial location which has attracted development, but also the fact that highway and infrastructure issues had been resolved. Issues relating to ownership and planning obligations were largely already resolved. Such advantages were clear attraction for strategic planners for commercial organisations a number of which are commonly based overseas.

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2.9 The introduction to the EDNA acknowledges that the research methodologies used to consider historic and predicted growth rates and therefore OAN includes key strategic stakeholders. Some of those stakeholders have a vested interest in promoting development and growth.

2.10 Warrington &Co is Warrington BC's development arm with a mandate to support and promote economic growth. It is also the part of the Council which has invested in and now owns and controls substantial areas of employment land in Birchwood and Appleton.

2.11 It is also clear that many sites with development potential are already in the control of developers. Langtree, Peel and Liberty have control over large parts of the areas of land which might be considered for allocation. Logically and legitimately such parties will highlight demand of employment land and the benefits of development of land

in their control. It is however considered that in reality need is driven by supply. In the current market any site within a motorway corridor can be shown to be needed. The availability of a green field site, next to a major motorway junction will inevitably attract interest and draw attention away from less strategically attractive, more difficult to develop sites.

2.12 It is understandable why Warrington would seek to maintain its status as a key destination for investment particularly around the logistics sector. However, given the high levels of employment within the Borough, there will be a need to import labour. Notwithstanding attempts to deliver a wide housing mix in new housing allocations, it seems unlikely that potential new residents so employed, would be able to relocate to South Warrington.

2.13 Evidence produced at the appeal into the Stobart distribution centre at Appleton Thorn (APP/MO655/W/19/3222603) illustrated the location of the place of residence for those employed at the existing Stobart Depot. 60% of staff lived outside Warrington Borough. Most others lived outside South Warrington. 7.14 In contrast to the approach to development plans in other locations, the predicted levels of growth in the case of Warrington are almost entirely based on the impact of development envisaged in the plan as the key driver. There is little or no conclusive evidence as to how activity elsewhere in Cheshire will prompt growth at the levels predicted. The plan is based on aspiration rather than justified through a sound evidence base.

2.14 There are numerous examples and concerns as to this absence of evidence.

2.15 The Strategic Economic Plan was produced by the LEP in 2018. The Plan anticipated growth based on the impact of HS2 in Crewe, development of a science and technology base across East Cheshire, car and aerospace development in West Cheshire. With the exception of additional warehousing to support an already dominant logistics base for the Warrington economy, there was no such catalyst for growth in Warrington other than its self imposed aspiration to secure "city" status, as set out in the PDO.

2.16 The period since the inception of the SEP has seen many changes. Leaving the European Union has clearly impacted on development decisions for businesses with strong European connections. Car manufacturing is controlled by Peugeot, aerospace by Airbus.

2.17 Issues with cost and debate over benefits of HS2 phase 1 has brought into question to certainty and timing of delivery of HS2 phase 2. The 2021 Integrated Rail Plan appears to promote connectivity into HS2 through the use of capacity of the Crewe – Manchester route for Northern Powerhouse Rail from Liverpool to Manchester. This would result in a new route into Warrington from HS2 west of Knutsford connecting to an upgraded route from Warrington Bank Quay Low Level via Ditton to Liverpool. Whilst it is understood that the Government has instructed HS2 to consider routes for this connection no information is available. The IRP suggests that these elements of HS2 and NPR will not come into until the 2040's. Considerably beyond the plan period and therefore for limited relevance in terms of impact on levels of economic growth expected within the plan period.

2.18 The scale of population and household growth and increase in the number of jobs envisaged by the SEP is no longer achievable. The needs assessment based on the aspirations of the SEP and historic trends which were achieved in an entirely different economic environment are no longer relevant. Growth appears increasingly dependent on demand resulting from the development of the Port of Liverpool. Accommodating this growth, principally for logistics, is a key part of the emerging local plans in St Helens and Halton. The absence of analysis of competition to meet these needs from any Statement of Common Ground is an issue of concern.

2.19 Apart from figures suggesting the overall area of land required to serve this source of economic activity there is little or no evidence to demonstrate a direct relationship to logistics development in Warrington.

3 Conclusions

3.1 The PSV21 is purely driven by the aspiration to accommodate growth. This runs counter to the provisions of the NPPF which seeks to ensure that development is sustainable across economic, social and environmental objectives.

3.2 The plan is predicated on a single objective and does not balance the considerations in the manner expected by paragraphs 8 and 9 of the Framework.

3.3 If the Plan is unbalanced and is excessively catered towards an economic objective then this will mean that this Plan would not be contributing towards the objective of sustainable development (which is development which balances all three objectives in 'mutually supportive ways').

3.4 This is a fundamental legal issue as s.39 (2) of the Planning and Compulsory Purchase Act 2004 requires the local plans do this. A failure to do so would mean the Plan is legally flawed as well as being inconsistent with the test of soundness at NPPF paragraph 16a.

3.5 Growth levels are based on the unsubstantiated ambitions of the Strategic Economic Plan of the LEP and Warrington Means Business. The ambitions are dated and fail to recognise later economic trends.

3.6 Growth levels are unrealistic and undeliverable based largely on an unpredictable and transient logistics market.

3.7 The period between the PDO consultation, PSV19 and PSV21 provides ample illustration of rapid change. PSV21 is still based on the same presumptions around growth anticipated in the Cheshire and Warrington LEP Strategic Economic Plan of 2018.

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3.8 There still uncertainty over the later phases of HS2. There is no realistic expectation that Northern Powerhouse Rail will reach Warrington within the plan period.

3.9 There is no track record of the delivery of growth at the continuous and high levels predict.

3.10 The Council should be challenged to demonstrate, how untested aspirational expectations for population, household and employment growth can be measured against historic trends and how those patterns of growth are distorted simply as a consequence of higher levels of land availability.

John Groves MRTPI

July 2022