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My comments are ordered by reference to the questions set out in the consultation document as follows:-

Question 1

Do you have any comments to make on how we've worked out the need for new homes and employment land for Warrington over the next 20 years?

Response:

**There is no absolute 'need' for any particular level or rate of provision of new homes. Assuming that WBC can sustain its case for what is fundamentally an employment-led development strategy in response to any objections made at the present stage, the housing need figures now proposed would be quite difficult to challenge.**

**The assessment of the overall employment land requirement is sure to be challenged since it appears to arise from a desire to attract a high proportion of those categories of employment, notably distribution, which are associated with significantly lower than average employee densities.**

**WBC does at least acknowledge that its ability to accommodate this level of housing land provision will rely very heavily on its being able to convince a Government Planning Inspector that the consequences, in terms of sacrificing large tracts of adopted Green Belt in the part of the borough almost exclusively to the south of the Ship Canal, should outweigh the benefits of allowing that area to continue as Green Belt.**

**On the other hand, if the Council were to revert to a strategy which would not provide for the borough to accommodate a rate of house building which would be sufficient to accommodate locally-generated growth of households in full without demonstrating that to do so would not lead to unjustified loss of Green Belt, that too might fail to survive an Inspector's judgement.**

**I believe that, if a Government Inspector were to recommend that this Plan be modified on the basis of its being either unjustifiably profligate or conservative in its implications for the Green Belt in particular, it could put at risk the Government's confidence in the Council's fitness as a plan-making authority. At the extreme, this could lead to plan-making powers being taken over by the Government. Those powers should remain with our locally-elected councillors.**

**It is now necessary to refer to the potential effects on this aspect of Warrington's proposals of the very recently-launched Department of Communities and Local Government's consultation paper 'Anew planning approach to speed up delivery of new homes'. This announces what is claimed to**

be an 'innovative approach to planning new homes to ensure that they're built where most needed'.

A linked consultation has been launched on 'Planning for the right houses in the right places'. This proposes a standard method for calculating local authorities' housing needs. It also trails a draft revision of the 'National Planning Policy Framework' [NPPF] promised in early 2018.

It is clear that the contents of any of these documents will have to be assessed and applied to the Plan's policies for housing and may, in fact, result in changes in their content. It would, at this point, be presumptive to suggest particular ways in which they might lead to revision of any aspects of the policy.

One point which is puzzling rather than a reason for objecting to plan's emerging policy content is the forecast increase in the Borough's resident population to 235,000 by the end of the plan period in 2037. On the fairly safe assumption that the present population is not less than 208,000 and that the average household size will remain unchanged at 2.40, the additional 24,000 houses to be provided would add 57,600 to the population, taking it to around 265,000. Even a reduction of the average household size to 2.35 would result in a population of 259,000 – 260,000. This is more than a 'pedantic' point as a population more than 10% higher than presently forecast could have implications for overall infrastructure requirements that will not have been tested.

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#### Question 2

Do you have any comments about how we've worked out the numbers of homes and amount of employment land that can be accommodated within Warrington's existing built-up areas?-

#### Response:

It is proper that the existing built-up area of the town and, to a more limited extent, previously-developed land in outlying settlements, should provide for as great a part of the borough's built development requirements as is possible, given the overriding need to retain and enhance those areas' outdoor environmental and recreational amenities. Whilst there must be some concern as to the Council's capacity to secure approval for, and implement provision of the enabling infrastructure, there may, equally, be previously unrecognised opportunities arising from e.g. the redevelopment of the hospital. It appears quite possible for the currently forecast capacity to be fulfilled but not necessarily exceeded.

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#### Question 3

Have we appropriately worked out the amount of land to be released from the Green Belt including the amount of land to be safeguarded?

Response:

Assuming an increase in the Borough's overall housing stock by 24,000 new homes over 20 years and a slightly lower level for the continuing period [albeit for an uncertain length of time] to provide sufficient safeguarded land, the answer is a rather guarded 'Yes'. But it would be dependent on the realistic contribution that can be made from maximising the capacity of the urban area [see above]. This applies equally to the proposed employment land requirements. As regards the amount of safeguarded land proposed, the proposal to identify sufficient developable land such that a further review of Green Belt boundaries should not need to commence before [perhaps?] 2047 such that a minimum 5 years' supply of developable land is continuously maintained. [See also my response to Question 12, below and the response by Lymm Parish Council which addresses this point in greater detail].

An additional point is that, whilst WBC are, quite legitimately, seeking to contribute positively to the Northern Powerhouse project, it certainly appears that the Greater Manchester group of authorities are being far more reluctant to sacrifice their own similarly-valued Green Belt areas to development for housing and employment [as most recently asserted by the Mayor of Greater Manchester, whilst conceding that some of it must be sacrificed to the benefit of maintaining a proportionate commitment to economic development].

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Question 4

Do you agree with the new Local Plan objectives?

Response:

I am unable to take any informed view of the objectives.

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Question 5

Do you have any comments to make about how we've assessed the different spatial options for Warrington's future development?

Response:

The assessment methodology is clearly explained and, given that WBC is determined to express its growth aspirations through provision of 24,000 new houses, it is inevitable that a radical solution should be put forward for consultation. That solution, certainly in terms of the scale of growth involved, cannot remain unchallenged. If, for example, the published Objectively Assessed Need [OAN] figure is used, that figure would be reduced to 19,100 [at 955 per annum] which, with a proportionate reduction of the employment land requirement, would not only reduce the area of Green Belt to be lost to development but would also lead to reconsideration of the most appropriate spatial option for development. If it really is necessary to add a 5% 'slippage' allowance, I would reluctantly accept that figure's being revised upward to 20,000. But I must

**draw attention to Warrington's planners' year-on-year references in SHLAA's to predicted site capacities' being fulfilled or even exceeded.**

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Question 6

Do you have any comments to make about how we've assessed the different options for the main development locations?

Response:

**The assessment methodology cannot be criticised as such but, as presented, it may have fallen short of presenting an unchallengeable case for concluding that the optimum solution to Warrington's options for growth should involve upwards of 90% of housing and employment development on land presently within the Green Belt being assigned to the southern part of the Borough.**

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Question 7

Do you agree with the Preferred Development Option for meeting Warrington's future development needs?

Response:

**I agree strongly with WBC's proposals for facilitating urban regeneration including its ambitions to enable development to the west of the town and recognise that, if it is to achieve its growth strategy in full, all self-contained outlying communities with the Green Belt should accept an appropriate share of growth which involves minimal harm to their character.**

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Question 8

Do you have any comments to make about our Preferred Development Option for the city centre?

Response:

**Generally supported**

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Question 9

Do you have any comments to make about our proposals for developing the Warrington Waterfront?

Response:

**Supported as being appropriate but a challenge in terms of coordinating the level of investment that will be required.**

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Question 10

Do you have any comments to make about our proposals for developing the Warrington Garden City suburb?

Response:

**Whilst confirmation of a commitment to develop the Garden village might well divert much of the pressure for new housing away from Lymm, it would involve a disproportionate reduction in the extent of the Green Belt in South Warrington as a whole, particularly taking into account the prospect of the South Warrington Urban extension bringing about further loss of Green Belt south of the Ship Canal.**

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Question 11

Do you have any comments to make about our proposals for developing the South-western Urban Extension?

Response:

**In addition to the general point made in response to Question 11, above, the considerable amount of development proposed here would only make sense if it were to demonstrably help to justify and contribute to the funding of provision of the proposed new westerly by-pass across the Ship Canal.**

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Question 12

Do you have any comments to make about our proposals for development in the outlying settlements?

Response:

**Of the three options considered for the level of housing development to be proposed for Lymm, the figure of 500 is strongly preferred. Whilst there is a strength of feeling within the local community that Lymm and Oughtrington, together, have already been allowed to expand to a degree that has threatened their village character, it would be difficult to contend that it should not take its fair share of the 9,000-plus houses that will need to be located within what is presently the Green Belt.**

**The real challenge will be for WBC, in consultation with the Lymm and Oughtrington communities, to allocate for development those sites from among the many for which 'bids' for allocation are on**

record which minimise any potentially damaging effects on the quality and integrity of the communities.

The most acceptable way to achieve that would be through Lymm's progressing a Neighbourhood Plan which has, at its heart, assimilating necessary development in a manner which best reflects the established communities' expressed interests. In light of this, I think it is premature and inappropriate to respond to the present consultation by way of proposing specific sites as housing allocations. This consultation may yet result in additional sites being put forward for consideration and there is already evidence of developers and landowners publishing promotional material for sites which are already bound for objective assessment.

At a general level, it does seem right to ask that special importance be attached to the long-term protection of the integrity of the open land gaps which separate the built-up area which separate Lymm from Thelwall, Oughtrington and Broomedge respectively although I appreciate that they cannot be eliminated from consideration alongside all other sites which are in contention for allocation. At this point, it is perhaps sufficient to say that many local people, including myself, can be expected to challenge the categorisation of many of the 'competing' sites on the edges of Lymm, Oughtrington and Thelwall

Acknowledging that Lymm may have to accept up to 500 additional houses, it is essential that every possible measure be taken to ensure that as great a proportion of such houses as possible is capable of being made available to local people aspiring to step on to the housing ladder in the area in which they can maintain day-to-day contact with their families.

WBC draws attention, rightly, to the considerable increase in income from Council Tax that will be generated by additional planned development. Should the made available pro rata the additional development taking place in the parish area, the opportunity should be taken to devote a proportion of it to improving and adding to sustainable transport links both within Lymm and Oughtrington and to other parts of the Borough which have functional inter-connections with the parish.

A requirement for provision of as high as 1,400 additional houses within, or on the periphery of, Lymm would, if that number were to result in development, undoubtedly cause undesirable harm to the quality of life of residents and the wider environment. The still higher option of 5,000 additional houses does not bear consideration as it would then need to be further supplemented by safeguarded land for the post 2037 period.

A further point which should not escape consideration in relation to the policy for safeguarding land is that, from past experience in Lymm [regarding land now fully developed in Oughtrington Lane], once land is designated as 'Safeguarded land', WBC must be certain that it will be prepared to withstand its premature release for housing in response to unduly aggressive promotion on the part of its owners and / or other potential beneficiaries and 'overtake' allocated sites, whose promoters may be prepared to bide their time until later in the plan period.

The consequence of such absence of control would be to accelerate the rate of land release such that, in the case of Lymm, the requirement of 500 houses to be built by 2037 would be at serious risk of being markedly exceeded well within that period.

As the Borough Council will be aware, the recently-formed Lymm Neighbourhood Planning group will have responded to this consultation. Whilst not being a member of its 'core' preparation team, I have registered my support for the group's work and wish to emphasise that, in both of

the Government consultation papers referred to above, there are renewed references to the importance of the role of Neighbourhood Plans.

The commitment at paragraph 5.51 of the consultation report, to offering Parish Councils the [possible] opportunity to determine which sites which sites to release [for development] should they wish to prepare Neighbourhood Plans would, I imagine, be welcomed by the respective bodies in Lymm and that the practicalities of such an arrangement will have been, or will be, discussed with them. The confirmation, at paragraph 5.49 of that report, that the proposal that Lymm should accommodate 500 new houses during the plan period is only indicative and that the final number will depend on detailed assessment of the implications of possible development for the character of the settlement, permanence of the Green Belt boundaries [presumably as proposed to be adjusted through this plan] and traffic impacts.

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Question 13

Do you have any comments to make about our proposed approach to providing new employment land?

Response:

**These appear to be generally acceptable when considered in the context of the associated level of housing growth under consideration. It would also be pertinent for WBC to take account of the results of the promised further meetings with its Mid Mersey partner authorities before confirming its overall approach to provision for new employment.**

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Question 14

Do you have any comments to make about our proposed approach in dealing with Gypsy and Traveller and Travelling Show-people sites?

Response:

**No comment**

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Question 15

Do you have any comments to make about our proposed approach in dealing with Minerals and Waste?

Response:

**No comment**

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Question 16

Having read the Preferred Development Option document, is there anything else that you feel that we should include within the Local Plan?

Response:

None

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