

Cheshire East: collated feedback on Warrington Proposed Submission Version Local Plan (PSV LP)

Comment No.	Topic	PSV LP section/ policy	Comment
1	Overall housing provision	4.1 (up to paragraph 4.1.30) & DEV1	Our understanding of Planning Practice Guidance and the NPPF is that the Government's standard housing need formula requires that the current year (not the initial Plan year) be used as the base year for household change, and the housing need should be based on the latest available housing affordability ratio for the latest available year. That would mean taking the ONS 2014-based household projections' projected change for 2019-29 (growth of 7,506, or an average of 751 per annum) and an affordability ratio (for 2018) of 6.32. ¹ This results in an indicative housing need for WBC of 859pa (not the 909pa calculated in GL Hearn's Local Housing Needs Assessment) and in turn implies that WBC's proposed provision of 945pa is a 10% uplift on what the Government's formula indicates. However, given that national planning policy allows councils to plan for higher levels of housing provision if that is required to achieve their economic growth aspirations – and given our view that the rate of jobs growth that the Proposed Submission Version Local Plan plans for is realistic – we still consider that Warrington's proposed provision of 945 net new dwellings per annum is reasonable. It will be important to ensure that this higher number can be fully delivered within the Plan period.
2	Economic growth and development/ employment and skills	4.2 & DEV4	It would be good practice to have a detailed skills and employment plan to complement the Local Plan proposals for development and employment creation.
3	Economic growth and development	4.2 & DEV4	Need to consider whether the employment land allocations will lead to a surplus of supply for some industries, given some will be directly competing with sites such as Ma6nitide in Cheshire East.
4	Economic growth and development/ Garden Suburb	4.2 & DEV4; 10.2 & MD2	There will be increased pressure on the highways networks of the north of Cheshire East, due to the expanded employment land, particularly the Garden Suburb site close to the M6/ M56 interchange. Improvements to the motorway junction will be needed.
5	Utilities/ telecoms	7.3 & INF3	There should be a proactive policy on the development of digital infrastructure and it would be good to see a mirroring of Cheshire East Council policies. The digital policy should be a default of opt-in, with housing, employment land and infrastructure developers either being mandated to meet a digital infrastructure standard (the best outcome), or (at least) giving a justification for opting out. The developer could further be requested to meet a quality level of infrastructure build.
6	Minerals	9.4 & ENV4	While Policy ENV4 and its accompanying justification provide a generally permissive approach to the determination of proposals for mineral extraction, the Council considers that a more proactive approach may be required in respect of aggregate sand and gravel if the Council is to better provide

¹ Source: Table 5c, 'Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2018' data set from the 'Housing affordability in England and Wales: 2018' statistical release, Office for National Statistics (ONS), March 2019.

			<p>for meeting a more sustainable proportion of its own needs.</p> <p>While a call for sites exercise was undertaken in 2016 and yielded no suitable sites, no attempt seems to have been made to understand why the fairly significant deposits of sand and gravel identified by BGS in the Borough have not come forward and whether the Council can do anything proactively to assist operators in bringing forward proposals.</p> <p>The Plan acknowledges that the minerals sub-region within which Warrington is located now has less than 7 years supply of aggregate, a position which has deteriorated further in the latest 2019 draft LAA. This sub-region, which includes Manchester and Liverpool, has plans for significant growth and yet there are currently no proposals for new sand and gravel sites in the whole sub-region. The assumption being made seems to be that sand and gravel requirements will be met mostly through a continuing and intensifying reliance on imports. It is not clear to what extent this assumption has been tested and that the required levels of aggregate can in fact be provided by the market over the plan period, so that the levels of growth identified in the Plan can be delivered.</p> <p>The Cheshire sub-region supplies aggregate sand and gravel to GM, Merseyside, Halton and Warrington sub-region. Cheshire East is currently preparing a draft Minerals and Waste DPD and is aware that it will need to make further provision to ensure that a steady and adequate supply of aggregate sand and gravel can be achieved if its regional apportionment or average sales figures are to be met. As no DTC discussions to date have identified the need for the Council to provide for higher levels of aggregate provision to meet the growth plans of neighbouring authorities, including Warrington, it is assumed that this will be provided by the market from elsewhere. The Council will be seeking to engage more formally on this matter through both the LAA work undertaken within the North West AWP and with individual MPAs through future DTC discussions.</p>
7	Renewables and low carbon energy	9.7 & ENV7	<p>The policy and/or its justification could usefully make reference to battery storage facilities as an example of a low carbon technology which captures energy, usually from renewable energy sources, for discharge to the national grid when required. This saves energy for use when needed which would otherwise be lost.</p>
8	Garden Suburb	10.2 & Policy MD2	<p>This development is in a predominantly rural area served by a dispensing GP practice (i.e. no community pharmacy). The development isn't mentioned in Warrington's current Pharmacy Needs Assessment (PNA), which seems to draw on an earlier version of the Local Plan. The Council will probably need to revisit their PNA, as it looks like additional community pharmacy provision will be needed. They may also need to look at primary care (GP) provision as it doesn't look as if current provision will be adequate.</p>