

# Response 914

## Respondent Details

Information	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

## PART A - About You

1. Please complete the following: Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique ID number for future reference (pdf attachment).

Name of person completing the form: Helen Lawes

Email address: [REDACTED]

2. What type of respondent are you? Please select all that apply.

A local resident who lives in Warrington

3. Please complete the following:

Contact details	
Organisation name (if applicable)	-
Agent name (if applicable)	-
Address 1	[REDACTED]
Address 2	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]

## PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate? From the drop down list please select one option.

Draft Local Plan (as a whole)

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

None of the above

**3. Do you consider the Draft Local Plan is: Please select one option in each row.**

	Yes	No
<b>Legally Compliant</b>	X	
<b>Sound</b>		X
<b>Compliant with the Duty to Co-operate</b>	X	

**4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

I object to Warrington's Proposed Submission Version Local Plan, for the following reasons:

- The housing need figures on which the plan is based have not been determined on a sound basis. The draft plan assumes a need for at least 18,900 new dwellings by 2037. The plan covers a period of 20 years, which is unnecessarily long. Deriving a robust estimate of future housing need is rendered more difficult by the decision to plan over such a long period of time. There is a substantial body of academic research which demonstrates the difficulty in deriving accurate forecasts of future population, particularly over long periods of time [1, 2, 3]. Population forecasts for individual local authority districts are highly sensitive to minor fluctuations in economic circumstances that are difficult to anticipate or predict with the required degree of confidence. It is very difficult to anticipate future migratory flows, especially in a context of unprecedented political uncertainty. If the ONS's 2016 population projections were used to determine future local plan housing allocations, this would imply an annual need for a net additional 343 dwellings to 2041. This is a figure substantially lower than in the draft local plan. Given this uncertainty over likely future housing need, the draft local plan should be more circumspect in releasing green belt land and adopt much more cautious figures in order to plan for housing land release. If this is the case, then a substantially increased number of future housing completions can take place on brownfield sites, without the need for green belt encroachment to the extent anticipated in the draft plan.
- The proposed location of land allocated for future housing would mean the unjustified loss of green belt land. This would have far-reaching consequences for Warrington. It would mean the loss of some 10% of Warrington's green belt. The impact on south Warrington, in particular, would be extensive. The environmental impact of increased traffic would be substantial, with higher levels of air pollution. Important land for informal recreation and leisure would be lost. The character and distinctiveness of Walton, Appleton, Grappenhall and Stretton would be damaged irreparably by proposed development. Given the questionable reliability of the estimates of future housing need over the plan period, there is not a sufficiently strong case for the permanent loss of green belt land.
- The draft plan is unsound because it does not adequately specify proposals to enhance infrastructure to accommodate the development envisaged. The existing road network in south Warrington is already at or near its full capacity. The draft plan does not properly outline how the increased demand placed on infrastructure will be accommodated. There is no provision for enhancement to major highways such as the A49 through south Warrington. Existing crossing points for the Manchester Ship Canal are expected to accommodate potentially significant increases in traffic stemming from new housing and industrial development. The draft plan does not set out in a clear way how the likely stress on existing infrastructure could be offset or mitigated. For the proposed development to be viable, the plan needs to specify with much greater clarity what is proposed in respect of enhancement to existing road capacity and future public transport provision. This should mean setting out in detail the mechanism through which appropriate funding will be raised, beyond relying on unspecified future developer contributions.

1. Field, B. (2018) Forecasting techniques for urban and regional planning, London: Routledge.
2. Keilman, N. (2007) "UK national population projections in perspective: How successful compared to those in other European countries?", Population Trends 129
3. Wilson, T. and Rees, P. (2005) "Recent developments in population projection methodology: A review." Population, Space and Place, 11(5) (2005): 337-360.

**7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.**

No, I do not wish to participate at the oral examination

**You have just completed a Representation Form for Draft Local Plan (as a whole). What would you like to do now? Please select one option.**

Complete the rest of the survey (Part C)