

23rd April 2023

**Local Plan
Planning Policy and Programmes
Growth Directorate
Warrington Borough Council
East Annexe
Town Hall
Sankey Street
Warrington WA1 1HU**

By email: localplan@warrington.gov.uk

Re: Draft Local Plan 2023 – Main Modifications

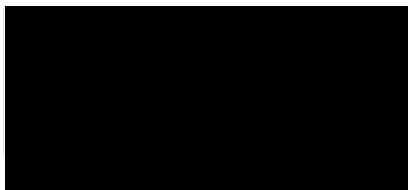
Dear Sir/Madam

Thank you for the opportunity to comment on the proposed modifications to the Local Plan. Our observations are provided overleaf, from which we conclude that the Local Plan remains unsound. In your subsequent deliberations, we would be grateful if you would take into account our comments and suggestions.

Yours faithfully



Steve Pearson



Helen Pearson

1. Forthcoming revision to the national planning policy framework

- 1.1. There appears to be no recognition that the government has consulted on changes to the national planning policy framework, which is expected in Spring of this year¹, including the abolishing of mandatory housing targets, which become advisory, and increased flexibility in how locally set targets might be delivered. Also proposed by the government is the provision that Green Belt land no longer needs to be reviewed or altered when making plans (with the implication that there is no implied requirement for exceptional circumstances arguments to be made if housing targets cannot be met). Whilst the details are unclear, if the Local Government Association comments² are taken on board, councils would be able to use the most up-to-date population projections (rather than relying on out-dated 2014 data).
- 1.2. The latest 2018-based projections, which by definition take no account of post-Brexit or post-pandemic population reduction, demonstrate how inappropriate the standard method has become. The 2018-based data predicts 91,829 households in 2021, 95,843 households in 2031 and 98,856 households in 2039. This yields a yearly average increase of 401 households (compared to 715 using 2014-based data) over the first ten years or a total increase over the plan period (18 years) of 7,027 (compared to 11,774 using 2014-based data). Applying the affordability uplift (14.2%) produces a housing need of 458 per year over the first ten years, compared to 816, which is the figure used extensively in the local plan. In other words, there is no scientific (i.e. evidence-based) link between this 'stated housing requirement' and population growth. In no way does the stated housing need of 816 homes per year actually reflect Warrington's need for housing arising from population growth.
- 1.3. Since the proposed changes to the national planning policy framework should legitimise a challenge to the standard method and allow local needs to be reflected in the local plan (including the protection of existing Green Belt), it should include the provision for its review as soon as the new national planning policy framework is published.
- 1.4. Without this provision, the plan does not include an objective assessment of the local housing need and is, therefore, not **positively prepared** in this regard, properly **justified** or **consistent** with emerging national planning policy – and by extension is unsound.

2. MM 005, para 4.2.13 – Employment land requirement

- 2.1. Revisions to para 4.2.13 provide a simple estimate of the employment land needed to support jobs growth associated with new housing provision. The calculation uses recent data to calculate jobs per hectare (142) and compares this to an estimate of 18,300 jobs delivered from 816 houses per year to derive the employment land requirement. However, the underpinning evidence for all data cited is missing (or not referenced) and in all cases should be authoritative and referenced, together with any assumptions. For example, an average of 816 houses per year for 18 years gives 14,688 dwellings (as per the plan). Using 2021 national census data (as an illustration only), suggests 2.4 people per household with a 75% employment rate for 16 to 64 year olds, which for Warrington represents 62.8% of the population³. This produces an estimate of 16,614 working people associated with new households over the 18-year term of the plan. Recognising that a high proportion of these will seek work outside the borough, given its transport links, means that a claim of 18,300 jobs appears very questionable and will need robust supporting evidence. That the original housing 'requirement' is based on out-dated 2014 population data, which is almost a factor

¹ <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy#chapter-4--planning-for-housing>

² <https://www.local.gov.uk/parliament/briefings-and-responses/levelling-and-regeneration-bill-reforms-national-planning-policy#chapter-4-planning-for-housing->

³ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

of two too optimistic compared to 2018 data (as discussed above), adds further dubiety (and should be revisited as suggested above).

- 2.2. As such, the calculation of employment land requirement should be reviewed to confirm (or otherwise) that all supporting data is authoritative, relevant, and transparent, and all associated assumptions should be stated explicitly, if necessary exploring the sensitivity of results to their uncertainty (since the effect on planning policy should be fully appreciated).
- 2.3. Without this evidence, the employment land requirement cannot be said to be **objectively assessed** or **justified** and, hence, this aspect of the plan remains unsound.

3. MM 008, INF4 – Warrington Hospital

- 3.1. The proposed changes appear to suggest that a review of the plan would not automatically be triggered by a decision to build a new hospital on a new site – and yet this would seem to invalidate the plan, with the unlocking of such a significant parcel of land for urban renewal, which could be used for affordable housing close to the town centre, or may require reallocation of employment area land or in the worst case, an exceptional circumstances argument for use of Green Belt for the new hospital. Hence, it would appear necessary to trigger a review of the local plan when a decision is made.
- 3.2. To do otherwise would be tacitly accepting a plan whose local needs will not be **objectively assessed** or **justified** following significant change.

4. MM 031, Part 3 – Monitoring Framework

- 4.1. Para 3 of the monitoring framework includes a new provision that where jobs growth exceeds that of the forecasts used to inform the Plan's housing requirement for three consecutive years, this will trigger the need for the consideration of a review or partial review of the Local Plan. However, monitoring should also recognise that the plan should respond to an economic downturn. Hence, it should be revisited if jobs growth falls below that implied by the Plan's housing requirement for three consecutive years. To be even handed, the plan should recognise that in a recession, there may be a reduced need for new housing, for example, if workers leave the borough or homeowners default on their mortgages.
- 4.2. Another trigger to review the plan should be new data on population growth, published periodically by the ONS, which has a direct relevance to housing needs assessment and should be taken into account as it becomes available.
- 4.3. As discussed in (1) above, any change to the national planning policy framework (or any other relevant government policy, arrangements or advice) should also trigger a review of the plan.
- 4.4. Without the four additional suggested triggers (including that suggested at para 3.1) for review of the plan, it is considered unsound, since it accepts implicitly that significant changes to local needs will not be **objectively assessed** or **justified**.