



RESPONSE TO WBC PREFERRED DEVELOPMENT OPTION (PDO)

Dear Sirs,

I strongly object to the PDO on the following grounds:

- The inadequacy of the consultation process
- The over-exaggeration of the number of houses required over the next 20 years due to the mis-calculation of the housing needs
- The lack of exceptional circumstance required to justify reclassification of Green Belt land.
- The flawed vision of making Warrington a city.

It is my view that Council officers have failed to carry out the necessary ecological, transport and air quality surveys that would have informed a robust and sustainable plan.

Consultation Process:

- The consultation process has been inadequately and badly communicated with thousands of residents only hearing about it due to residents taking measures to ensure all those affected were informed.
- WBC should have learned from earlier consultation stages and, rather than invite the easy building over the Green Belt, evolved a constrained development option driven solely by the innovative regeneration of brownfield sites to meet anticipated demographically required housing needs.
- The Green Belt satisfied the tests of durability when it was designated and WBC have presented no exceptional circumstances to justify a change. • There is no evidence beyond an incorrect and inadequate financial model to support deliverability of even just the demographically required future housing needs.
- With its investment in Redwood Bank there is a suspicion that WBC are going to subsidise developers and are not independent to the process.

- The residents of the borough deserve a higher standard of disclosure and transparency than has been shown to date if WBC is to regain the support of the electorate.

Overstatement of new homes and employment land needed in Warrington:

The PDO document is very technical and references certain key numbers as given “fact” without direct links to the source material or considering alternative calculations. The Objectively Assessed Needs (OAN) is cited on p.5 of the PDO as 839 new homes per annum - but this was based on 2012 surveys. Before publishing the PDO, WBC were in possession of an updated May 2017 report based on 2014 data which shows a comparable figure of just 738 homes per year (but could be as low as 679 homes pa), but this number has been ignored. As the 839 is taken as the base for the higher Economic Development Needs Assessment (EDNA), then if the 839 is a significant overstatement, so must be the EDNA. The lower number is more consistent with the 716 homes pa average until 2039 within the latest ONS live tables which could be used to underpin the Government’s proposed formula for calculating OAN published in September 2017.

- The PDO should have been prepared on the basis of the May 2017 addendum (or at very least stated at outset that it was based on out-of-date estimates that had subsequently been shown to be significant overstatements).
- There is no recognition of alternative assumptions and so the broad range of potential outcomes, particularly those with much lower housing requirements.
- The legal challenge to the previously adopted Local Development Plan was premised on the plan not properly reflecting the OAN and affordable housing requirement.
- However the PDO is stated to be “Option 2” – this is based on the aspiration of the Council executive to create a “new city”, it is not the independent, objective and expertly assessed need of the town.
- The data used by the officers to derive the housing need is highly sensitive to the interrelationship between employment, population demographics and dwelling occupancy. The particular assumptions used appear to have been selected to justify a higher housing requirement significantly above the OAN and do not appear logical, consistent or robust.
- Option 2 is based on an excess employment and economic growth outlook that is based on very high level assumptions and considerations completely

outside the control or influence of WBC, and ignore the competing aspirations of adjacent and further afield boroughs and housing areas.

- All the economic initiatives highlighted under the EDNA such as Cheshire devolution and HS2/HS3 will, if they ever come to fruition, be needed just to provide jobs for the natural increase in the population, they are not a justification for even more housing.
- The projections used are based on data periods prior to the Brexit referendum. The Plan should be based on an updated Strategic Housing Market Assessment that takes account of latest economic, demographic and migratory expectations.
- In addition, the housing requirement should be based on a calculation of OAN that is consistent with the methodology and data underpinning the Government's September 2017 proposals for a nationally consistent approach.
- Any higher levels of development should be clearly and separately identified as excess to Needs and so subject to a much higher standard of justification and challenge.
- There appears no specific consideration of how technology will impact lifestyles and working practices, an issue not unique to Warrington. Unless and until there is a proper understanding of future employment nature and density, it is almost impossible to define what employment land is required, let alone where it should be.
- There is no Government requirement to produce a twenty-year plan even if long-term ONS statistics exist.
- WBC should produce a ten year plan, by which point we will be much clearer of the economic and migratory impacts of Brexit, the impact from any completed national infrastructure initiatives and what the consequences of technological change have been on work and home life (and balance). It would also allow for the decommissioning of Fiddlers Ferry and so the availability of an enormous brownfield site requiring regeneration.

I have been a resident of Thewall or Lymm my whole life having been born in my parents' house in [REDACTED] and choosing to remain here to raise my own children. Having made that choice to live in a village environment within Green Belt land, I am heart-broken at the proposal to destroy so much of the Green Belt rendering the areas of Thelwall, Grappenhall and Appleton an urban sprawl and causing these areas to lose their village identities

I look forward to seeing your response and confirmation that my legitimate objections have been properly considered and addressed in any subsequent plan.

Yours faithfully

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