

Dear Sir / Madam,

I wish to strongly to the current Preferred Development Option for the following reasons:

- Public consultations have been held prior to the infrastructure feasibility study results being completed and published. The Council representatives have been unable to answer whether the feasibility study is taking place on all 5 reported options or just the preferred development option.
- Conflicting answers have been given to the same questions asked at the Lymm and Stretton public consultation meetings. If representatives are unable to get the councils message across consistently, what hope does the public have to digest and comprehend the limited information being supplied?
- It is misleading of the council to let the public to believe that the volume of housing required is something set by Government when it is WBC who have calculated the volume requirement.
- It is unreasonable of the council to base the calculations of the housing requirement on figures produced:
  - pre Brexit announcement;
  - when it was believed that the HS2 line would require a stop in Warrington; and
  - recent Government announcement of revised housing requirement calculation methodology.
- There is enough Brownfield land in the area to build 15,000 houses. Potentially enough to meet a reduced housing requirement. Therefore allowing the council to protect and preserve existing green belt land.
- The majority of the proposed housing to be located in the least densely populated and more expensive areas of the town. Unaffordability but high council tax implications.
- A 2016 study by the World Health Organisation Warrington was recorded as having the 2<sup>nd</sup> highest air pollution levels in the North West. Impact on health and mortality. Why would the Council wish to increase this further?
- While it may appear convenient for the council to repurpose the railway embankment considerations:
  - - state of disrepair of the high level bridge
    - integrity, form and strength of the embankment
    - destruction of wildlife/protected species habitats
    - Heritage and preservation of local history e.g Knutsford Road bridge cited in the Unitary Development plan as being of significant local, architectural and historical interest.

- Destruction of TPT amenity which is currently a well-used nature path utilised by walkers, runners and cyclists and part of the National Cycle Route Network
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- Considerable blight to surrounding houses and neighbourhoods and destroy the community feel which attracts and retains residents in the areas around Warrington.
  - The consultation and online documents do not adequately explain what happens with the 'strategic transport route' once it reaches the bridge at Wash Lane.
  - The 'strategic bus route' over Cantilever Bridge does not consider inadequate weight limit of that bridge. Who will pay for the essential upgrading, ongoing maintenance and basic caretaking of this bridge?
  - PDO document attempts to justify why Option 1 has been discounted and why Option 2 is the preferred. No mention of options 3, 4 or 5?
  - Representative at the Stretton consultation said that Warrington Hospital is fully involved however they appear to have now been sent away to decide how best to fragment services. Increased population will place a significant burden on an already over-stretched and under-resourced service.
  - 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.

