

[REDACTED]

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

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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