

Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) are statutory requirements of the plan-making process. A *Sustainability Appraisal Report* examining the Local Plan Core Strategy was published in 2012, and followed several years of evidence gathering, consultation and plan development. The Sustainability Appraisal Report is therefore predicated on material and assumptions which in some cases are the best part of a decade out of date, and is flawed in several respects, as evidenced below.

i. Housing Growth Forecasts

Firstly, the housing growth and demand forecasts are methodologically flawed. The PDO document is very technical and references certain key numbers as given fact without direct links to the source material or alternative calculations. For example, the Objectively Assessed Needs is cited as 839 new homes per annum. Although the executive and officers were in possession of an updated May 2017 addendum to the SHMA prior to publication of the PDO in July 2017 which derives a comparable figure of just 738 homes per year (but that the number could be as low as 679 homes per year), this number has been ignored. As the 839 is taken as the base for the Economic Development Needs Assessment, then if the 839 is a significant overstatement, so must be the EDNA. The lower number is more consistent with the 716 homes per year within the ONS live tables used to underpin the Government's proposed formula for calculating OAN, which was published in September 2017.

It appears the planning office has ignored any scenarios or independent reports/models, however robust, that lead to lower housing need due to net migration and unattributable population change, and have further discounted any trend rate of change in later years that requires additional reductions in the projected housing stock, even allowing for additional economic led requirements.

Indeed, many of the numbers used appear to include explicit and material margins but these are all premised on underestimating future requirements – hence combined the total will be excessive compared with an evidence based bottom up calculation. The current approach obfuscates the case for the assumed level of growth, and is open to challenge.

Unless there is clear consensus on the base data, then this will inevitably undermine the SEA / SA process and the conclusions drawn from it.

ii. A disjointed, non-compliant approach to the SEA / SA Process

The July 2017 Interim Sustainability Report, which the authors acknowledge is not compliant with the SEA / SA Regulations, and which will be superseded in due course, is directed towards the appraisal of the revised housing and economic growth targets for the Borough. It is not an integrated document, because it fails to adopt an integrated and holistic approach towards examining sustainable development across all aspects of the Local Plan; its purpose is solely to address the environmental and social consequences of three housing allocation options in isolation from the rest of the adopted Core Strategy. In doing so, it creates contradictions and anomalies with the original 2012 Sustainability Appraisal Report.

For example, the 2012 report, based upon the original housing provision of 10,500 homes over the Plan period, concludes that the Plan will protect and improve the quality and character of places, landscapes, townscapes and the wider countryside whilst maintaining and strengthening local distinctiveness and sense of place by *focusing on the regeneration of previously developed sites and protecting green spaces*. With such a material and significant shift in the basis upon which the 2012 was predicated, the appraisal of just housing allocations in the 2017 report is inherently flawed

because there are complete contradictions with the plan making process for the Core Strategy, even though the PDO is intended to simply be retrospectively slotted into the adopted Plan.

The 2017 Interim Sustainability Report fails to examine the significant environmental effects of the revised housing allocations in an integrated manner alongside other elements of the adopted Core Strategy. By focusing only on the relative sustainability performance of housing and employment forecasts (which as stated above are inherently flawed), it overlooks the broader, cumulative and indirect effects on the adopted Core Strategy that the proposals will give rise to when considered in combination with other types of development. There is no consideration, for example, of links into the LTP3, and whether certain elements of the Transport Plan are indeed still relevant. While the Council is presently trying to back track from the proposed road scheme through Thelwall and Grappenhall which is illustrated in the PDO, it is a prime example of how the significant indirect environmental and community effects of the housing allocations have not been adequately considered in the plan-making process.

Further, the evidence for the differentiation of the options in the 2017 report is very weak, and in some cases similar appraisal outcomes are being used to reject the other proposals while at the same time supporting Option 2.

iii. Flawed Public Consultation Process

The SEA Regulations (Regulation 13 (2)) require that the responsible authority shall take steps... *to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental Assessment of Plans and Programmes Directive ("the public consultees")*. The inadequate level of responses (78) to earlier consultations with those received being biased towards developers – would suggest poor process and communications on the part of WBC rather than a lack of public concern. This should have alerted officers to weaknesses in the consultation process, prior to designing the public consultation process for the PDO. There simply hasn't been any awareness of the PDO proposals within the local community, and undertaking the consultation process during the summer holiday period simply ignores good practice in public consultation planning. At the very least WBC could and should have undertaken a letter drop of affected communities rather than simply ignoring them and blighting hundreds of local homes in the process. The consultation events held in the first week after the summer holiday period were chaotic, poorly organised and uninformative; they were an abject lesson in how not to engage constructively with local people.

The officer I spoke to at the Stretton public consultation event, when queried on the Thelwall and Grappenhall road scheme, said *'I now wish we hadn't bothered'*. When a local community is blighted by development and infrastructure proposals, it deserves to be part of an informed, accountable, transparent and meaningful consultation process. The residents and electorate of south Warrington deserve better.

iv. Non-conformity with NPPF and WBC Core Strategy

The Core Strategy confirms that...*the integrity of the Green Belt, which was established within the borough for the first time in 2006, is to be preserved across the entirety of the plan period and beyond. National policy makes clear that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are therefore their openness and their permanence.*

Further, the strategic objectives of the Core Strategy include...*securing the regeneration and renewal of the older areas of the town, strengthen existing neighbourhoods and making the most efficient use of infrastructure, ensuring development brings benefits to their host communities whilst maintaining the permanence of the Green Belt in the Borough and protecting it from inappropriate development.*

This clearly places the PDO in conflict with the Council's own adopted Core Strategy and National Policy.

Concluding Comments

In conclusion, it is very doubtful whether there has been a compliant consultation SEA / SA process, or a meaningful public consultation exercise, to support the adoption of the PDO. The methodology in the 2017 report is flawed and based on the selective adoption of evidence and outcomes, and in some cases actually contradicts the National Planning Policy Framework and adopted Plan policy, especially in relation to development on the Green Belt.