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29th Sept. 2017

Dear Sir/Madam

Please find below my thoughts and comments on the recent release of the Preferred Development Option and my strong objection to this proposal.

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., why?

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should have been prepared on the basis of the May 2017 addendum (or at very least stated at outset that it was based on out-of-date estimates that had subsequently been shown to be significant overstatements).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.
- 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. I have not spoken with a single person from Warrington, outside of the Council, that has any aspiration whatsoever, to have Warrington be a City! We have two of the most prosperous and vibrant Northern cities not 30 miles either side of us which is why people have chosen to live in Warrington to take advantage of its green spaces and openness while working in nearby cities.
- 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. Businesses are actively and visibly leaving Warrington post Brexit, which completely goes against what WBC are stating as reasons for needing more housing...
- 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 a very strong suspicion, given all the publicity out there, that Peel Holdings and Edie Stobart are key drivers to these so called housing needs, and in no democratic society should large corporations be driving the policies and decisions of an elected council. This is potentially corrupt at best and illegal at worst!
- 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.

In summary there are monumental flaws to the calculations used by WBC to create this PDO and there is masses of empirical evidence suggesting that most if not all of these proposal decisions contained within are driven by a desire to please Peel Holdings and their plans for Port Warrington and expansion of the Manchester Ship Canal network. This kind of corporate nepotism can not and should not be allowed to ruin the lives, homes and surroundings of thousands of people just because 'money talks'.

