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29th September 2017

Dear Sir or Madam,

I write to object to the Preferred Development Option (PDO). I live in Grappenhall and have done on-and-off for my [REDACTED] years to date. Grappenhall is a beautiful village in what should be a thriving town. It is not a town within a city, and never should be – for many reasons. I firmly believe this is the wrong plan for the wrong number of the wrong type of homes, and worst of all in the wrong places (greenbelt, for example).

The basis of my argument for objecting the PDO falls into 4 main areas. These are:

- The flawed vision for making Warrington a city
- The inadequacy of the Consultation process
- The miscalculation of the Housing needs
- The lack of exceptional circumstances for reclassifying the Green Belt

The fact that we only found out about the PDO because someone found out about it and alerted people via word of mouth and Facebook is, frankly, disgusting. As a council-tax-paying resident, whether you are obliged to legally or not, on common decency and moral grounds I can't believe that you find it acceptable not to write to everyone to inform us of this PDO. If cost prohibited that then posters on lampposts and notice boards in local shops would have at least shown some willing. Your job as a council is to serve your residents, communication should be right near the top of your list of priorities. Furthermore, not only has the consultation process been poorly communicated, it was also inadequate and driven by a fantasy of the council to turn Warrington into a city. How many of the town's residents want Warrington to be a city? I'd suggest that the people of Warrington would first and foremost want a vibrant town centre (not how Bridge Street is now) and a fit for purpose, sustainable transport infrastructure.

As mentioned above, the choice of location is possibly the most upsetting part of all of this; our greenbelt. The very same greenbelt that once satisfied the tests of durability when it was designated, and in all of WBC's documentation I am yet to read any exceptional circumstances that justify a change of use. Surely a more innovative regeneration of brownfield sites to meet anticipated demographically required housing needs would have been a more appropriate proposal. Regarding this point, there is no evidence beyond an incorrect and inadequate financial model to support deliverability of even just the demographically required future housing needs.

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.

In terms of the new homes and employment land needed in Warrington, I have strong concerns over the information which WBC has presented as fact. There are many details in the PDO document, including certain key numbers which have been presented as facts but don't have any links to the source material/studies or that consider alternative calculations. I wouldn't get away with presenting information in my job, so why should WBC believe that this is satisfactory.

An example of the above is the Objectively Assessed Needs (OAN). This is cited on page 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 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.

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 PDO is therefore 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. It is also a plan pre Brexit – is Warrington immune to the impact of Brexit? I'd have thought all plans should at least be reconsidered.

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. We can then see what is in-line with the rest of the country, and what is fantasy of turning Warrington into a city. In other words, clearly stated plans based on proper metrics. Not smoke and mirrors which the PDO is full of.

The claim that there is a requirement for employment land is extreme, given that there are currently over 900 units all varying shapes and sizes currently already available to let in Warrington.

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.

Yours faithfully

