

## **Warrington Borough Council Draft Local Plan**

### **Warrington Climate Emergency Commission Comments for Consideration**

The Warrington Climate Emergency Commission was set up to help advise the council on its response to the climate emergency and lead the conversation for the response of the wider Borough. The Commission received a presentation on the Draft Local Plan and were invited to make comments and observations regarding its incorporation of climate-related policies.

The Local Plan sets out to shape the future development of the area. It provides a vision and framework for future development and addresses certain needs such as housing and employment, as well as preserving the natural and historic environment, and mitigating and adapting to climate change. We recognise the importance of the Local Plan as one of the few statutory documents produced by local authorities with the ability to directly address climate change and set policies to help reduce carbon emissions and create a more sustainable Borough. It is the principal mechanism through which the spatial aspects of climate adaptation and mitigation can be addressed and thus plays a pivotal role in the climate agenda. It is vital that the plan is developed in a way that is compatible with carbon reduction targets and impending changes to national building requirements.

The National Planning Policy Framework (NPPF) <sup>[1]</sup> states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures [in line with the objectives and provisions of the Climate Change Act 2008]” (Section 14, p. 45).

“Plans should increase the use and supply of renewable and low-carbon energy and provide a positive strategy for energy from these sources, that maximises the potential for suitable development” (Section 14, p. 45).

Upon review of Warrington Borough Council’s (WBC) revised Draft Local Plan (2021)<sup>[2]</sup>, it is clear there are several proposed policies and targets that seek to address the climate emergency, such as Policy ENV7 and Policy DC6. Having said this, we believe some areas could be strengthened to develop a more robust Local Plan that better addresses the climate-related needs of the Borough. We hence wish to make the following comments:

## **1. Challenges and Opportunities**

We welcome that the 'Vision' of the Plan (Section 3, p. 20) features recognition of the need to be a carbon neutral and 'exemplar green town', and we encourage the subsequent acknowledgement of a need to transition to renewable energy sources and decentralised networks. However, in previously not acknowledging the climate emergency as being one of the 'key challenges' the Borough as a whole faces in the Challenges and Opportunities section of the Plan (Section 2, paragraph 2.2.2), the discourse is somewhat incoherent and inaccurately portrays climate change to be an issue that is not on the forefront of the Council's agenda. The climate emergency is in fact one of the key challenges Warrington faces and will continue to tackle in the future. Warrington is not alone in this crisis, if the wider UK is to become net-zero by 2050, local authorities must collectively work together and play their part in achieving this. We therefore suggest the climate emergency is added to this key challenges list to recognise the council's climate emergency commitment from the outset of the Plan.

## **2. Policy ENV7: Low-carbon energy and heating**

We support the sentiment in Policy ENV7 (Section 9.7) in requiring new major developments to reduce emissions beyond the minimum requirements or meet a percentage of their energy needs from renewable or low carbon energy sources. We also back the requirement for large residential developments to consider district heating systems where it is feasible and viable to do so, noting the council has recently secured HNDU funding for heat mapping to help establish the feasibility of potential heat networks locally. However, we feel the policy should be strengthened to include sufficient acknowledgement of the Future Homes Standard <sup>[3]</sup> that is to be enforced from 2025 and upcoming changes to the Part L Building Regulations that will take effect in 2023; at the very beginning of the effective plan period. The Future Homes Standard sets out the following:

- From 2025, new homes built to the Future Homes Standard will have carbon dioxide emissions at least 75% lower than those built to current Building Regulations standards
- The Future Homes Standard will deliver homes that are zero-carbon ready
- New homes will not be built with fossil fuel heating, such as natural gas boilers
- No further energy efficiency retrofit work will be necessary to enable them to become zero-carbon as the electricity grid continues to decarbonise

From 2020, interim amendments to Part L standards would deliver 'a meaningful reduction in carbon emissions and provide a stepping stone to the Future Homes Standard' <sup>[3]</sup>. This amendment expects new homes to produce 31% less carbon emissions compared to previous standards. In addition, the new Government net-zero strategy aims to ban the sale of gas boilers by 2035 in the UK.

As a result, we believe the Local Plan should take greater account of these changes to avoid the need for buildings to be retrofitted in coming years, which would prove challenging and more costly. All new developments should be restricted from implementing fossil-fuel heating and no new connections should be made to the gas grid. We feel the policies surrounding the need for alternative heating should be more comprehensive and we recommend reviewing this to ensure new developments comply with 2025 standards. The 2025 regulations <sup>[3]</sup> state:

“We anticipate that heat pumps will become the primary heating technology for new homes” (Chapter 3, p. 5).

Despite this, there is not one mention of a heat pump throughout the Local Plan.

We believe the 10% minimum standard for renewable/low carbon sources for new developments is limited when compared to other authority Local Plans. For instance, Richmond Upon Thames’ Local Plan (2018) requires all new major residential developments to achieve zero carbon standards and all other new residential buildings to demonstrate a 35% reduction in CO<sub>2</sub> emissions over Building Regulations (Part L) standards (Section 6.3, Policy LP 22)<sup>[4]</sup>. Similarly, all new non-residential buildings will be required to meet BREEAM ‘Excellent’ standard. We feel Warrington should similarly be implementing policies that go above and beyond current minimum requirements for carbon reductions and seek to build new developments that are as close to zero-carbon as possible. We should aim to be at the forefront of the climate agenda and not present an impression that we will settle for the minimum of what is expected. It is accepted that the Government’s own guidance can be conflicting. However the focus on achieving more than a specific ‘minimum standard’ that is itself due to be replaced is not in line with the direction of travel we need to move and ‘out of step’ with net-zero targets and carbon budgets.

We suggest requiring developers for all new major developments to submit a carbon statement, outlining the total emissions of the proposal and the measures in place to be compatible with net zero. Developers should be expected to detail how they have taken net-zero targets into account and quantify the carbon footprint of proposals, rather than just satisfying a minimum standard. Similarly, developers should disclose how their plans will meet Future Homes Standards to be ‘zero-carbon ready’ without need for future retrofitting. The associated plan wording could give examples of standards that might be adopted that would satisfy the Council that these matters have been given due consideration, for example achieving passivhaus or similar standards where a developer has to demonstrate levels of performance.

The identification of new sites moving forward should be done so with scope of achieving carbon neutral or carbon negative development.

### 3. Sites for Renewable Energy and Policy GB1

The NPPF <sup>[1]</sup> states that local plans should:

“Consider identifying suitable areas for renewable and low-carbon energy sources, and supporting infrastructure, where this would help secure their development” (Section 14, p. 45).

“[When determining planning applications for renewable and low carbon development] a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and b) approve the application if its impacts are (or can be made) acceptable” (Section 14, pp. 45-46).

We wish to comment on the lack of identification of renewable energy sites within the Plan. There is a blanket statement requirement for all proposed developments to meet a proportion of its energy needs from renewable or low-carbon sources in line with Policy ENV7, and there are clauses requiring housing and employment allocations to maximise opportunities for the use of decentralised energy systems, but there is no specific assessment of suitable developments within the spatial plan for such infrastructure. The Fiddler’s Ferry proposal recognises the potential for low-carbon energy given its pre-existing grid infrastructure, which we commend. This aside, the draft plan does not identify or allocate potential land for other renewable projects.

The Plan refers to The Liverpool City Region Renewable Energy Capacity Study from 2010 in its justification for Policy ENV7, where it identified no areas within Warrington Borough Council suitable for wind energy, and in relation to new developments identifies that combined heat and power and district heating networks as the most suitable and viable solutions for achieving significant reductions in CO<sub>2</sub> emissions across the Borough. The context and opportunities for renewable energy will have changed in the time since this study was conducted. We suggest an update is needed to assess the current opportunities for renewable projects in Warrington. The opportunity for such projects will have evolved. The need for such renewable energy developments is also now more pressing in the light of new climate emergency agreements and targets.

We believe it justifiable that some land in the green belt is appropriate for renewable generation projects, particularly solar farms, where the nature of such developments and the climate emergency benefits of producing clean energy can be justified in the context of the climate emergency. The NPPF states that:

“When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources” (Section 13, paragraph 151).

Section 9.7.9 of Policy ENV7 acknowledges this statement but merely describes that renewable proposals will be considered against their impact. The policies do not indicate any special weighting for renewable energy proposals to be permitted under green belt policy. There is no clause included in Policy GB1 of the Local Plan that relates to renewable energy development.

We would argue that renewable projects such as solar farms do not conflict with many of the key functions of green belt because they do not prompt urban sprawl. A “very special circumstances” case can be made therefore to allow some solar farm development on green belt land within Warrington on the grounds that it would:

- Generate clean energy that will contribute towards Policy ENV7 of the Local Plan
- Lead to an overall reduction in carbon emissions in the Borough, helping to tackle the climate emergency
- Create an income that could be invested in a community benefit fund that would help secure wider benefits and assist progress to net-zero
- Encourage an increase in biodiversity (as has been evidenced at other WBC-owned solar farms)
- Allow for education of local people about the need for renewable energy to mitigate climate change
- Be able to be restored to its original condition at the end of the project’s life

As indicated, part of the revenue from such projects could form a community fund to assist other initiatives that help to tackle the climate emergency, such as retrofitting houses or developing heat networks. This will help to overcome the financial limitations associated with projects of this nature and help facilitate net-zero development in the built up areas of the Borough, helping the plan fulfil its expected function. This would also support aspects of Policy ENV7 which state:

“In assessing low carbon and renewable energy proposals, the Council will give positive weight to initiatives which are community-led or where there are direct benefits to the local community through their involvement (paragraph 2, p. 170)”.

We suggest that a clause is included within green belt policy (Policy GB1) in the Local Plan to consider the use of some green belt land for renewable projects. We feel there is a “very special circumstances” case particularly where proposals include a wider community benefit outcome through a community benefit fund that would kick-start other local green projects and contribute to other policy targets, such as Policy DC6 relating to climate change adaptation. The Plan could identify appropriate land for the development of solar farms based on the justifications mentioned above, or the policy could detail the criteria for such an exemption to enable developers to bring forward compatible proposals.

We would like to add that we believe it should be a requirement for developments on new employment land to identify suitable locations for the installation of solar PV. This would contribute to meeting their own energy needs as well as encourage other green initiatives. For example, large distribution centres would benefit from the green electricity that could be used to charge electric HGV’s. Similarly electricity generated

could supply staff EV charging points and the surplus would generate additional revenue for businesses. New employment development in existing business parks should also be required to explore opportunities for solar PV.

#### **4. Policy DC6: Climate Change Adaptation**

We welcome Part 4 of Policy DC6 (Section 8.6, p. 139) requiring new developments to have integrated climate change adaptation measures and energy efficient design. We feel this could be built on within the Plan to include specific examples of measures that can be considered on a case-by-case basis where they might be feasible. There should be more specific acknowledgement of the impacts climate change will have in Warrington that generally UK buildings and developments are unprepared for. For instance, the increase in average temperatures and frequency of extreme weather events is likely to lead to overheating. Inclusion of these specific examples in the policy sections relating to building adaptation would be beneficial to present a clearer picture.

The NPPF outlines how the approach of plans to mitigate and adapt to climate change should take into account long-term implications such as the risk of overheating from rising temperatures. In spite of this, the revised Local Plan does not mention overheating or rising temperatures in relation to building adaptation. Developers should be required to demonstrate how they have designed buildings to maximise opportunities for heating and ventilation, and how they will overcome some of the impacts associated with a changing climate.

Reading Borough Council's Local Plan <sup>[7]</sup> provides detailed suggestions of how new and existing buildings should demonstrate that they have considered measures such as solar shading, thermal mass, heating and ventilation, appropriately coloured materials, green and brown roofs, green walls, tree planting and other green networks that provide shading for new-builds. It should be mandatory for developers to demonstrate how they have considered and included these measures. The intention of including this in the Local Plan is to avoid the need to retrofit these buildings in the future, as extreme weather events will only become more frequent and intense.

One particular adaptation that tackles an array of social and environmental issues is the use of green walls and roofs (also known as living walls/roofs). These green structures can be retrofitted onto existing buildings or designed in as part of new buildings, providing an abundance of plants and greenery that serve many benefits. Foremost they contribute to the mitigation of climate change through enhanced carbon capture, and additionally help buildings adapt to future weather through enhanced insulation in the winter and cooling in the summer. The addition of greenery contributes to a reduction in particulate matter, improving air quality within the Borough. They are considered a sustainable urban drainage system as they intercept heavy rains, helping to protect against urban flash flooding. They provide habitat for insects and can be comprised of a wide variety of plant species, leading to overall biodiversity net gain. From a social perspective, these infrastructures

enhance the built environment creating recreational areas that are beneficial to general wellbeing.

The advantages of these structures are abundant and are widely accessible as they simply utilise infrastructures that will already be in place. We hence feel that it should be articulated within Policy DC3 relating to green infrastructure (Section 8.3, pp.118-119) or within Policy DC6 (Section 8.6, p. 139) relating to climate change adaptation to consider the implementation of such infrastructure within all new developments wherever it is feasible and viable to do so. This would benefit both Policy DC3 and DC6, but also Policy ENV2 and ENV8, contributing to many of the targets within the Local Plan.

## **5. Policy ENV5: Energy Minerals**

Policy ENV5 outlines that proposals for exploration and exploitation of hydrocarbons including gas and oil would be supported under the satisfaction of relevant criteria, including (Section 9.6, pp.163-164):

- a) A full appraisal programme for the oil or gas field has been completed; and
- b) The proposed location is the most suitable, taking into account environmental, geological and technical factors; and
- c) The cumulative landscape and visual impacts of the development of the oil or gas field and essential associated infrastructure have been assessed; and
- d) Proposals accord with all other policies of the Local Plan in relation to the protection of the environment, public amenity and sustainable transport.

Coal exploitation is judged similarly, where permission will be granted if:

- a) The proposal is environmentally acceptable; or
- b) Can be made so by planning conditions or obligations; or, if not
- c) Provides national, local or community benefits which clearly outweigh the likely impacts to justify the grant of planning permission.

In our view, the exploitation of fossil fuels is environmentally unacceptable under the context of a climate emergency. The policies within the Plan are far too permissive, when taking UK legal targets and the Paris Agreement into account. We face an immense task of combatting the damage that has already been inflicted through combustion of fossil fuels, and therefore feel it is not acceptable to be permitting further damage to be done. It is contradictory both to the climate ambitions of the Council, and to the other policies within the Plan (e.g. Policy ENV7) to allow the extraction of fossil fuels within the Borough. Though national policy is not always compatible with the implications of the Paris Agreement we feel it is important to raise this point and acknowledge that to meet our climate obligations society needs to move to phase out fossil fuel use. We suggest far more rigorous control on such policies to limit this from taking place and suggest the policies for hydrocarbons are treated in a similar manner to peat extraction.

## **6. Data and Targets**

Section 9.7 (p.170) refers to the 2015 Paris Agreement and 2008 Climate Change Act in relation to UK emission reduction targets. We feel the policies embedded throughout the Plan could be more aligned with such targets. If we are to contribute to legally set net-zero targets, the plan should set out a science-based carbon budget for the local area compatible with these. We maintain that there is a lack of current data in Section 9.7 of the Plan relating to Warrington's emissions and recommend adopting the Tyndall Centre's Local Authority Carbon Budget report tool which outlines Warrington must meet reductions in CO<sub>2</sub> emissions on the scale of 13.7% per year <sup>[5]</sup>. This would provide current policies with greater justification and any additions or changes can be made in line with these figures. We feel taking an evidence-based approach to reduction targets for new developments is crucial to make policies more effective and would be invaluable to the Plan as a whole. For information, the Commission has developed a position paper "Developing a local strategy for Warrington in the face of the global climate emergency" which recommends using the Tyndall Centre local carbon budget as a basis for a local climate emergency strategy.

It is generally expected of a local plan to include an understanding of baseline emissions within the council area and an acknowledgement of emissions inevitable in future developments <sup>[6]</sup>. It should be exhibited how policies in the Local Plan will limit emissions in line with wider 2050 UK targets as all sectors are now needing to plan for full decarbonisation within the next three decades. Given the plan period covers half of this timeframe, it is expected there will be significant progress made in this time.

## **7. Monitoring**

Similarly, we feel the targets and monitoring indicators relating to Policy ENV7 (Appendix 2, p.277) could be strengthened. While we support measuring the installed renewable energy capacity and targets to promote renewable infrastructure, we feel some indicators could be made more explicit. We propose having quantifiable targets in relation to low-carbon policies, such as a target tonnes of CO<sub>2</sub> per capita for new developments. These can be monitored more easily and present more meaningful information when comparing new developments. Likewise, Policy INF1 relating to sustainable transport could exercise more explicit monitoring metrics for low-carbon transport. For instance, the percentage of journeys made by bike or on foot, rather than the fluid measure of 'levels of cycling' (Appendix 2, p. 275).

## **8. Policy INF1: Sustainable Travel and Transport**

We support the requirement for new developments to integrate electric vehicle charging infrastructure. We note the current expectation is in line with Council Parking Standards (2015) <sup>[8]</sup>. These current standards require 5% of unallocated spaces in communal residential areas to have the capacity to retrofit chargers in the



future. Commercial and non-residential development should have charging points on 5% of spaces unless they impact the viability of the development as a whole, in which case it should have the capacity to retrofit in the future. Given the end of the sale of new petrol and diesel cars from 2030, the rapid transition to electric vehicles in the UK is well underway. All new developments should therefore provide sufficient infrastructure to support this transition and provide residents or commercial occupants the means to make this switch as soon as possible. We suggest the Plan set requirements relating to electric vehicle charging that exceed the minimum requirements set out by the Council's Parking Standards. This would additionally correlate with policies outlined in the fourth Local Transport Plan <sup>[9]</sup> and contribute to LTP4 targets. Overlap with the LTP4 could be cross-referenced within the Local Plan in its justification of Policy INF1, to provide a more holistic outlook and align targets across different Council's strategies.

We also suggest this transition to electric vehicles is considered in relation to the additional energy capacity required to support such charging infrastructure, and outline how developments could support the increased demand e.g. through small-scale renewable projects.

## **9. Greening Business Developments**

Where land is allocated for new business developments, we should consider the occupation of new sites with businesses that fall within the green sector. New business parks should accommodate the growing green/circular economy and encourage the occupation by those who fall within this sector. This would provide benefits for Warrington overall and will help to shape the town as a hub for green enterprise.

We acknowledge it may not be possible to specify such businesses but where possible we should promote Warrington as a centre of green activity. We should encourage the uptake of these types of businesses wherever the Council plays a role in shaping the details of new developments. These matters could be considered in any supplementary planning guidance or design briefs.

## **10. Policy DC3 and Policy DC4: Green Infrastructure and Ecological Networks**

We recognise the importance of green infrastructure for its role in climate change adaptation and mitigation, and the integral role of policies to protect and enhance biodiversity within the Borough to address the climate crisis. There is substantial reference throughout the Plan of the need for green space and green networks to be integrated throughout new developments. We support the updated objectives to secure a measurable net gain for biodiversity across the Plan area, and the addition of compensation sites for those developments which may disrupt habitat or wildlife corridors. We commend monitoring targets and indicators relating to these policies using quantifiable metrics, such as measuring biodiversity gains using the DEFRA

metric. We similarly support the rigorous regulations that restrict development on areas of land that are of special ecological importance.

The natural environment has immense value for its carbon storage capacity; a store that will play a vital role in efforts to reach net zero emissions. There is a need to improve the capacity of these natural stores. We therefore wish to encourage the consideration of the degree to which the Local Plan can facilitate the increase of natural carbon storage, which in turn may support a net gain in biodiversity. We welcome the particular mention in the text associated with Policy DC4 of the need to restore peat bogs wherever possible in the Borough. We wish to suggest further mention of the general need to enhance soil health and woodlands wherever possible to improve natural carbon storage.

We feel it is important to flag up the role of mature trees for carbon storage and the need to avoid their loss through development. Replanting trees in compensation sites may not deliver the same immediate CO<sub>2</sub> removal benefits. We believe policy should aim to promote the incorporation such trees into scheme designs without the need for removal.

Additionally, we wish to highlight the need for the provision of the necessary capacity to ensure Local Plan policy is being implemented and enforced in practice. Concerns raised by a member of the commission elude to a gap between policy wording and what can sometimes be delivered on the ground by developers. Once planning permission is granted there should be sufficient scrutiny of the work carried out by developers to ensure they are fulfilling their duties set out in the Plan. We do, however, acknowledge and support the addition of the DEFRA biodiversity metric to assess losses or gains in biodiversity resulting from new development or changes in land management. We trust that this measure will contribute towards the monitoring of Policy DC3 in action.

To secure long term natural carbon storage there is a need to address ongoing management and care of relevant natural assets restored or added as part of the development process. We recognise the Local Plan can not in itself deliver all the necessary actions to support biodiversity but that the right land use policies have a critical role when supplemented with appropriate wider land management strategies, policies and practices.

Overall we commend the Plan's inclusion of many low-carbon and sustainable initiatives. Our observations provide suggestions for how to strengthen the policies to bring them in line with international and national net-zero targets and to help ensure land use patterns and new developments contribute to creating a more resilient Borough.

## Supporting Documents

- [1] Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. [Online] Available from: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1005759/NPPF\\_July\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)
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