From: Marcus Swann

Sent: 15 November 2021 08:02

To: Local Plan

Subject: Re: Local Plan Comments

Dear WBC,

I would like to add to my comments that on the basis of current developments in Lymm, I see no evidence that considerations of infrastructure being in place before the development is started has happened. I also see no evidence of requirements for better than minimum environmental or energy efficiency measures. In light of this I doubt that in practice these developments will go ahead with the level of consideration or to the standards implied in the plan.

Kind regards, Marcus

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From: Marcus Swann

Sent: Monday, November 15, 2021 12:16:40 AM

To: localplan@warrington.gov.uk **Subject:** Local Plan Comments

Comments on the local plan. from Marcus Swann,

In general the proposed local plan does not appear consistent with the national target on climate change, which requires substantial reductions in CO2 emissions. The local plan should be much more detailed about how it can help meet this target.

The plan mentions contributions to infrastructure from developments, such as provision of school places, it mentions consideration on Transport Assessments and Travel Plans and ensuring infrastructure is in place. However, with respect to OS4 and OS5 in Lymm, the primary and secondary schools are at capacity, I cannot see how a developer is going to do something about this. The same goes for transport. Without detailed consideration of upgrades to paths and cycle paths, which are currently inadequate, more housing cannot avoid significant detrimental impact to travel and transport and safety within the village.

Vision 2 section 3.1.3 point 10

"New developments will be built to the highest levels of energy efficiency"
What does this mean? This is not specific enough. e.g. Does this mean that the planning office will require all building to be built to the Passivhaus standard? It would be groundbreaking if it were the case. If not, then the statement is intended to be misleading.

One example in Lymm states (**Policy OS5 section 17**.; "be as energy efficient as possible and seek to meet a proportion of its energy needs from renewable or low carbon sources in accordance with Policy ENV7")

ENV7 says 10% of energy should be renewable or from low carbon source. This is wholly inadequate and does not correspond to "as energy efficient as possible". The houses should be

zero carbon. This is in direct contradiction of our national target of reducing CO2 emissions by 68% by 2030.

W4 7.1.13

This section mentions taking neighbouring developments into account yet there is no mention of the current and future developments going ahead in Carrington/Partington. They will put a huge burden on the A6144 through Lymm yet no mention of the consequences of this development are included in the plan. This will also be compounded by development OS5 on Rushgreen road in Lymm.

8.3.2. DC3 2e

Mentioning *opportunities* for links to the TPT is not a plan. It is meaningless greenwash. Please rewrite something along these lines

"We will create active travel links to the upgraded TPT"

The Local Cycling and Walking Infrastructure Plan (2019) states that "Lymm has been identified for a package of improvements to facilitate local cycling trips". The proposed development "Policy OS5 – Lymm (Rushgreen Road)" should make specific reference to the aforementioned Infrastructure Plan because the proposed development plot sits astride a prime candidate for creating a foot/cycle bridge over the Bridgwater canal thus freeing up many areas of Lymm for sustainable travel options.

Policy OS4. 15c. Mentions "Other necessary network improvements as identified by an appropriate Transport Assessment." If anyone looked at how children from this area are expected to travel to the high school on the other side of Lymm it would be clear that it is currently very difficult. Both OS4 and OS5 will cause significant additional vehicle traffic without major improvements. The location close to Statham primary school will also significantly impact congestion there. Cross-Lymm active travel could be enhanced by upgrade to the Trans-Pennine Trail and an additional cycle track from the TPT, past the development OS5, and across the Bridgewater canal at a new pedestrian/cycle bridge. Is the land for OS4 not at risk of flooding? This is not likely to be resiliant to the impacts of climate change.

Green Belt

Policy states that green belt should be used only after brownfield sites are exhausted, however the local plan releases green field sites for rapid and immediate development, citing the need for meeting building targets. This is an absurd stance. The brownfield sites will simply never be developed if this approach is taken.

According to the Prime Minister, no new houses should be built on the Green Belt. This plan should surely be put on hold until this policy has been put into effect?

Transport Links

Travel into the town centre already suffers from decades of development to the south of the town without the expansion of transport links from the developed areas into the town. Your plan for development of the town centre is meaningless if the largest release of land for

development under the plan is the other side of a barrier that effectively cuts off the development from the town centre.

MD2: I note that much of the development runs close alongside Green infrastructure/open space. The consequence of development so close to green space will have a devastating effect on nature and wildlife. The idea that such a development could be biodiversity positive is fanciful.

MD6: Employment Allocation. Having a large employment area so far outside of Warrington makes active travel there difficult.

kind regards, Marcus Swann