From: Ed Dowling

**Sent:** 15 November 2021 16:16

To: Local Plan

**Subject:** Local plan representation

Hello,

As a local resident of Warrington, I wish to make the following comments on the Draft Local Plan 2021:

## Fiddlers Ferry and Thelwall Heys

I wish to comment on the allocation of green space within the proposed Fiddlers Ferry development. Building on green belt in other places seems needless when there is brownfield land that is being allocated to green space. While I usually wouldn't be opposed to enhancing green space on a brownfield site, I find it difficult to support when there are large areas of green belt land being released elsewhere. Given the employment land allocated at Fiddler's Ferry, surely it would make more sense to maximise residential opportunities here. The redevelopment of this large brownfield site should be a priority over potential green belt sites.



The release of green belt land at Thelwall Heys will be detrimental to the people in the surrounding communities. This is a very popular walking route; boasting the canal and Trans-Pennine trail on its boundary. During the last 18 months this area of land has been essential to the mental and physical wellbeing of local people, and is an important part of the community.

To witness the proposed development of 300 homes on this land would be a tragedy.

Not only to mention that the surrounding infrastructure and facilities simply cannot cope with this number of additional residents. The adjacent roads leading up to the motorway services are congested as it is, and will not cope with the additional pressure. There is no mention within the plan for the provision of health services such as GP's or dentists, which are already oversubscribed. The proposal for these homes do not align with the areas of new employment land, meaning congestion will only increase as people will have to travel across town leading to detrimental effects on air quality.

The development on this land is absolutely unnecessary when there is land on brownfield site that is not being maximised, such as that at Fiddlers Ferry. I ask that you utilise said brownfield land to maximise residential opportunities – which would overall not add burdens to road infrastructure as much of the proposed employment land is at this site.

I ask that you do not allow development at Thelwall Heys due to its current recreational use, wellbeing importance to local residents and the associated burdens on road and social infrastructure.

In the sustainability appraisal, Thelwall Heys performs neutral or negatively in most areas, leading to negative effects on air quality, biodiversity, open space, loss of agricultural land. Given the small size of the development, the environmental damage and green policy sacrifice does not seem worthy for only very small housing gain.

I would strongly argue that this development is not sound as there are reasonable alternatives that would lead to far less harm. I hope you take my concerns into consideration.

## **SEWUE**

I would argue against the allocations for the South East West Urban Extension. I feel they are inappropriate given the vast network of sites of ecological importance; including ancient woodlands and conservation areas. Under the current context of a climate and ecological emergency, it is absolutely unnecessary to allow development on land with such integral importance to the mitigation, adaptation and resilience of our communities to such crises.

I realise there is a need to meet housing and employment needs, but there are other options for the SWEUE (e.g. Option 4) that would have much less of a detrimental effect on the resilience of our ecosystems and communities when facing such environmental pressures. I argue that alternative options for this development are considered and amended where appropriate.

I would strongly argue that this development is not sound as there are reasonable alternatives that would lead to far less harm. I hope you take my concerns into consideration.

## **Low-carbon Energy**

I feel policy ENV7 tackling renewable energy could be strengthened to take greater consideration of upcoming building standards. The Future Homes Standard is to be enforced from 2025 and upcoming changes to the Part L Building Regulations will take effect in 2023. The Future Homes Standard sets out that new buildings should be zero-carbon ready and will not be built with fossil fuel heating.

The Local Plan should take greater responsibility in meeting such standards, 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. I feel the policies surrounding the need for alternative heating networks should be more comprehensive and I suggest reviewing this to ensure new developments comply with 2025 standards. Heat pumps will likely become the primary source of heating for homes in the future but there is no mention of heat pumps throughout the Plan.

I believe the 10% minimum standard for renewable/low carbon sources for new developments is limited. I feel Warrington should 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. This is to help the town move towards net-zero and help to mitigate against further climate change.

## **Policy ENV5: Energy Minerals**

In my 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. I 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.

Thank you for taking the time to read and consider my comments.

Kind regards,

**Edward Dowling**