

Proposed Submission Version Local Plan

PART A - About You

1. Please complete the following:

Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique reference number.

Name of person completing the form: Zoe Cohen

Email address: [REDACTED]

2. What type of respondent are you? Please select one option only.
If you are an agent please select the type of client you are representing.

A local resident who lives in Warrington

3. Please provide your contact details:

	Contact details
Organisation name (if applicable)	-
Agent name (if applicable)	Zoe Cohen
Address 1	[REDACTED]
Address 2	-
Postal Town	[REDACTED]
Postcode	[REDACTED]
Telephone number	[REDACTED]

PART B - Representation Form 1

1. To which part of the Local Plan does this representation relate?

From the drop down list please select one option.

Plan as a whole

2. What does your comment relate to? Please select one option.

None of the above

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).

There is some relation in my comments to Section 9.7, and Policy ENV7, but my comments are also wider on the whole plan

3. Do you consider the Draft Local Plan to be: Please select one option in each row.

	Yes	No
Legally Compliant		X
Sound		X
Compliant with the Duty to Co-operate	X	

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

1. WBC declared a Climate Emergency in 2019 and yet there appears to be no reference to this in the whole plan or consultation presentation
2. The government has a legal requirement to reach net zero and no reference to this was made/was visible
3. The extent of the house building and infrastructure construction in the local plan will have a large, significant embedded carbon footprint - this receives no mention at all. Therefore residents and the Council have no idea whether this is within Warrington's allocation of the national carbon budget. I very much doubt this is the case - especially given that in reality the carbon budget for the UK doesn't exist or at the most optimistic runs out in 3/4 years.
4. No mention is made to zero carbon homes and the urgent need to ensure all new properties do not use fossil fuels for heating, lighting or cooking, (or at least are off the gas grid) - there is only a very weak and vague statement made about construction being '10% more energy efficient' - it is not even clear what this means and what the baseline is. This is truly appalling given we are in a climate emergency.
5. This means that all homes built as a result of this plan will require retrofitting to be suitable for the world we are now in - probably leaving buyers with a bill of around £20k per property. This is a truly appalling situation for both the climate and for buyers and residents
6. given that 1.5 degrees global average heating is now locked in and we only have 5% chance of avoiding 2 degrees we will be facing more and more heatwaves and other extreme weather events. All housing and other buildings need to be adapted to face this, otherwise they will be unsuitable and create health risks for people, especially the elderly, young children, pregnant women and people with disabilities. All homes must be adapted for cooling and shading and all streets need to be designed with this in mind
7. UK wide water shortages are predicted by Ofwat within 20 years - therefore all new builds should be fitted as standard with grey water collection etc - again there is no mention of this to my knowledge
8. some designated areas for building appear to be on flood plains - eg, Pool Lane Lymm? surely this is totally inappropriate as we know that flooding will be getting worse and worse in the years and decades to come
9. WBC declared an Ecological Emergency in December 2020 - again one would not know from the Local Plan consultation. There is little evidence that this has had any impact at all, which is very troubling indeed given what a major piece of important planning for the next 15+ years the Local Plan is. The Council also agreed in Dec 2020 to produce a Tree Strategy - I can see no evidence of this, nor its being integrated with the Local Plan - where are the areas of reforestation and rewilding across Warrington?
10. Warrington is over-provided with retail park space and these areas provide ideal sites for residential developments as so much infrastructure is already present etc. More efforts need to be made to use these sites instead of green field/green belt space

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

I answered yes to the Duty to Cooperate, but I dont know a great deal about it

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

I think I have set out some of this in my answers to 4. above

I think WBC should have regard to the Committee on Climate Change (CCC) risk assessment report from June 2021 - <https://www.theccc.org.uk/publication/independent-assessment-of-uk-climate-risk/> - amongst other things this refers to the risks from 'exposure to heat in homes and other buildings'

Also see this site by the CCC - <https://www.ukclimaterisk.org/> and <https://www.theccc.org.uk/wp-content/uploads/2021/06/Progress-in-reducing-emissions-2021-Report-to-Parliament.pdf>

It is not clear whether the Local Plan has taken sufficient account of flood risks - see this site for predicted impacts for Warrington - https://coastal.climatecentral.org/map/13/-2.6804/53.3663/?theme=sea_level_rise&map_type=year&basemap=roadmap&contiguous=true&elevation_model=best_available&forecast_year=2050&pathway=rcp45&percentile=p50&refresh=true&return_level=return_level_1&rl_model=gtsr&slr_model=kopp_2014

In essence, from attending the Local Plan consultation one would have no idea that the world, the UK and Warrington are heading for catastrophic global heating and climate and ecological breakdown in the next 10-20 years - ie, in the life of this Local Plan! Therefore the plan cannot be concluded to be 'sound' in any real way

This report sets out the global climate risks very well in summary -

https://www.chathamhouse.org/sites/default/files/2021-09/2021-09-14-climate-change-risk-assessment-summary-quiggin-et-al_0.pdf

And this report from KPMG sets out how we are on trajectory for social, economic and environmental collapse by 2040 - <https://advisory.kpmg.us/articles/2021/limits-to-growth.html>

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

because according to the WBC officers I spoke with at the consultation, noone else had mentioned issues in relation to carbon or climate emergency, and as they are vitally important they need to be part of the oral examination

You have just completed a Representation Form for Plan as a whole.

Please select what you would like to do now?

Complete the final part of the form, Customer 'About You' questions and submit response **(Part C)**