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Warrington Borough Council

Local Plan Review

Regulation 18 Consultation: Standard Response Form

October 2016

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2: Questions

Question 1

Do you have any comments to make about the Council's evidence base?

Question 2

Do you consider the assessment of Housing Needs to be appropriate?

Question 3

Do you consider the assessment of Employment Land Needs to be appropriate?

Question 4

Do you consider the alignment of Housing Needs and Job's Growth to be appropriate?

Question 5

Do you consider the assessment of Land Supply to be appropriate?

Question 6

Do you consider that Green Belt land will need to be released to deliver the identified growth?

Question 7

Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?

Question 8

Do you agree that further land will need to be removed from the Green Belt and Safeguarded for future development needs beyond the Plan period?

Question 9

Do you consider it appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Local Plan review?

Question 10

Do you consider the Sustainability Appraisal Scoping Report to be appropriate?

Question 11

Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?

Question 12

Do you agree with the assessment of Local Plan Policies at Appendix 1?

Question 13

Do you consider the proposed 20 year Local Plan period to be appropriate?

Question 14

Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?

3: Responses

Question 1

See attached statement

Question 2

See attached statement

Question 3

See attached statement

Question 4

See attached statement

Question 5

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Question 6

See attached statement

Question 7

See attached statement

Question 8

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Question 11

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Question 12

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Question 13

See attached statement

Question 14

See attached statement



Representations

Warrington Borough Council Local Plan Review:
Regulation 18 Consultation

For: ADS Estates

16-453

Project : 16-453
Document : Warrington Borough
Local Plan Review
Client : ADS Estates

Date : December 2016
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1. Introduction

- 1.1 Emery Planning are instructed by ADS Estates to prepare and submit representations to the Regulation 18 Consultation currently being conducted by Warrington Borough Council.
- 1.2 The representations are submitted in the form of this statement, which assesses the strategic element of the consultation before going on to promote our client's specific interests in the borough as part of the call for sites exercise. The formal response forms are also submitted.
- 1.3 We address each relevant question as set out in the Regulation 18 Consultation Standard Response Form in turn. Many of the questions are intrinsically linked which results in some overlapping in our responses. We have only responded to questions relevant to our client's interests.

2. Regulation 18 Consultation

- 2.1 As stated above, this section of the statement addresses the questions as set out in the Regulation 18 Standard Response Form. Each relevant question is addressed below.

Question 1 - Do you have any comments to make about the Council's evidence base?

- 2.2 We do not provide a full response to this question, as the evidence base is integrally linked to our response to the topic specific questions below.

Question 2 - Do you consider the assessment of Housing Needs to be appropriate?

- 2.3 In broad terms we consider that the assessment broadly takes into account the components of OAN required by the PPG.
- 2.4 We would have had significant concerns about certain elements of the Mid Mersey SHMA had a requirement in the order of 839 per annum been taken forward, as it failed to fully take account of several components of the OAN, in particular the alignment with economic growth and insufficient uplift to address affordability. However the addendum SHMA paper seeks to properly align the OAN with employment growth, and therefore in principle we consider that

the approach is reasonable. We do however have some issues over how the OAN has been aligned with economic growth. We address these in our response to Question 4.

- 2.5 We note that a more comprehensive update of the SHMA is to be undertaken 'in due course'. The 2014-based household projections have been available since July 2016, and we would therefore urge the Council to update the SHMA as soon as possible. Nevertheless although the 2014-based projections will change the starting point, it will still be necessary to take into account all of the other components of the OAN, and critically align the OAN with economic growth.

Question 4 - Do you consider the alignment of Housing Needs and Job's Growth to be appropriate?

- 2.6 We broadly welcome the council's revised approach and acknowledgement that there is an acute need for housing to accommodate future growth in the borough. However, whilst the revised identified requirement of 984 as set out in the published SHMA Addendum document is a welcome update to the previous SHMA, the OAN identified may still insufficient to meet the needs of the borough over the plan period. It is considered that there are potential flaws in the methodology, particularly relating to the relationship between the proposed jobs growth and the amount of housing required to deliver it.
- 2.7 Our client's main concern is that the chosen jobs growth figure is extremely conservative. The Review of Economic Forecasts and Housing paper prepared by Mickledor provides information on how the projected employment growth figure of 27,280 as identified in the preferred Devolution Deal policy trend has been reached. If past trend data between 1992 and 2014 continues throughout the plan period, it indicates an increase of 36,175 jobs between 2016 and 2037. Considering that past data is inclusive of the worst economic recession since records began, it is unrealistic to expect future growth to be below past trends.
- 2.8 We note that the Economic and Development Needs Study considers different scenarios to establish the OAN for employment land. The report considers the amount of land required to meet the jobs growth projected from the Devolution Bid, but discounts this approach in favour of projecting forward past take-up rates:

*However, the market assessment and a review of the historic trends in employment change and land take up (see Section 8.0) suggest that these forecasts underestimate land needs significantly. **The preferred forecasting***

method is therefore a projection forward of past take-up rates that considers both strategic and local needs.

- 2.9 It is therefore apparent that the Economic and Development Needs Study considers that land for significantly more than 31,000 jobs needs to be provided in Warrington.
- 2.10 Notwithstanding, even if the Devolution Bid is accepted as the basis for determining the OAN, it is apparent that Warrington has significantly outperformed other parts of the region in terms of delivering employment land and jobs growth. This reflects the strategically significant location of Warrington, in particular having regard to its connections to the M6, M56 and M62. This adds further weight to the trend based growth figures, which in our view could actually be exceeded through the Devolution Bid and Northern Powerhouse projects.
- 2.11 The Northern Powerhouse jobs growth figure put forward in the Mickledor report is plainly not realistic. The increase in jobs growth suggested in the Northern Powerhouse Independent Economic Review is for the entire Northern Powerhouse area, and has been taken completely out of context in applying that figure for Warrington. However the reality is that despite the context of the Northern Powerhouse, Warrington is seeking a jobs growth figure substantially lower than past trends.
- 2.12 We therefore consider that the chosen jobs growth figure is too low and does not meet the Government's requirement to 'plan positively'.
- 2.13 The Mickledor paper continues to apply a series of calculations to the jobs growth figure to each a housing requirement. In our view there are a number of issues with the approach taken that should be resolved before the plan is progressed any further.
- 2.14 The first calculation is to take account of net in-commuting. The paper states:
- "The commuting statistics for Warrington (Census 2011) show net in-commuting to Warrington and that total employment in the town only represents 88% of the total workforce size of the town. As a result, to maintain the commuting rates at the same level the total employment growth can be multiplied by 0.88."*
- 2.15 In principle, we consider that it is correct to assume that commuting ratios will remain constant throughout the plan period. However, if Warrington is to continue to rely on a significant amount of in-commuting to meet its jobs growth, there needs to be a greater understanding of

which neighbouring authorities are over-providing housing (and therefore a surplus of workers) against its own projected jobs growth figures. The duty to co-operate must be fulfilled, and cross boundary working should be fully documented so that it can be understood how this issue is being addressed.

- 2.16 The next calculation reduces the number of required workers by assuming that 3% will be filled by people working two jobs. The paper states:

"The number of people with two jobs in Warrington is estimated by GL Hearn at 3.1%. Therefore 96.9% of the employment growth should be counted for the purposes of calculating the required change in the workforce."

- 2.17 This calculation appears to assume that every person holding two jobs in the borough is filling two full-time roles. This is highly unlikely. It is possible that a number would hold one full time and one part time position, but it seems more likely that the vast majority of this 3.1% would hold two part time positions. It is therefore not clear how this would translate to a full time equivalent figure. Furthermore, it is possible that there is some double counting with the changes accounted for to the economic activity rates, as discussed below.

- 2.18 The paper assumes that there will be an increase in economic activity of 10.55% from the existing employment base, which has resulted in a further discounting of projected number of employees needed to fill the jobs growth. However we consider that this proposed increase in economic activity is flawed. We have been involved in numerous Local Plan examinations in recent years where economic activity has been considered, but this is usually in the context of a small section of the population; for example the Cheshire East Local Plan Inspector rejected the Council's proposed reliance on an increase in economic activity rates in persons aged over 65.

- 2.19 A breakdown by age groups is provided at table 1 of the SHMA addendum:

Table 1: Changing Economic Activity Rates

	Age	Warrington	
		2014	2037
Males	16-24	56.7%	61.5%
	25-34	85.0%	92.5%
	35-49	88.8%	97.2%
	50-64	76.0%	86.2%
	65+	14.0%	16.5%
Females	16-24	61.2%	66.4%
	25-34	84.1%	96.0%
	35-49	86.5%	98.4%
	50-64	67.5%	81.2%
	65+	9.6%	11.7%

Source: GLH eam

2.20 It is clear that the Council is relying upon a very significant increase in economic activity rates across a number of different groups. This depresses the need for new employees and thus dwellings. For example, the economic activity rates for males and females in the 35-49 age group is expected to rise from 88.8% and 86.5% to 97.2% and 98.4% respectively. Similar increases are seen in the 25-34 category. This is a staggering increase, especially when it is considered that many persons in these categories will be having children, and it is reasonable to expect that at least one parent may stop working. The age 50-64 category is also expecting increases above 10%. It is not clear what the evidential basis for this is, whether it has been accepted in other Local Plan examinations, and whether this has been sense-checked. But notwithstanding, even if the figures are accepted, it is not clear how they translate into a full time equivalent figure such that 10.55% of future jobs growth will be met from this source.

2.21 In summary, we have serious concerns over the selection of the jobs growth figure, and the methodology used for aligning this with the OAN. We consider that the methodology used seriously under-estimates the number of workers required to fill the projected jobs growth. As a consequence the OAN may be significantly higher than the figure of 984 per annum as identified in the SHMA addendum.

Question 5 - Do you consider the assessment of Land Supply to be appropriate?

2.22 No.

2.23 The Urban Capacity Study states that the recent SHLAA exercise has confirmed a capacity of 15,226 new homes, which is disaggregated as follows:

- 10,806 units identified through the SHLAA exercise.
- 7,176 units within identified 'Masterplanned' regeneration areas within Warrington Town Centre and Inner Warrington (-3,715 units that had been identified through the SHLAA process).
- 960 windfall allowance.

2.24 In the first instance, the capacity assessment confirms our points made elsewhere within this Statement that a substantial amount Green Belt will need to be released in order for the Council to meet their objectively assessed development needs in accordance with the Framework.

2.25 Almost half of the urban capacity confirmed by the Council relates to land identified within the inner areas of Warrington for regeneration. Although we welcome the delivery of such regeneration areas, which the Council has envisaged coming forward for development for many years, there is no indication within the Urban Capacity Study of the very significant risks that such sites may fail to deliver over the plan-period and other adverse consequences of reliance upon such sites.

2.26 The delivery of sites within the 'Masterplanned Areas' of inner Warrington is very challenging and this reflected in the fact that many of the sites identified have been allocated for development in previous iterations of the local plan (e.g. Arpley Meadows in the UDP 2006). For such large sites, complex land ownership issues need to be addressed with potential referral to compulsory purchase order legislation, and substantial initial outlay required in terms of new infrastructure requirements.

2.27 There is no indication that any detailed feasibility or viability work has been carried out into the vast majority of the sites listed as 'Warrington Waterfront Development Agency', which equates to 7,176 dwellings. The draft masterplan drawing at Appendix 1 is not accompanied by any supporting detailed evidence or analysis, and it is not clear whether this masterplan has been formally endorsed by the Council. Certain sites within the inner 'Masterplan Area' have been assessed by the Council through the SHLAA process. However, this exercise has only highlighted the very significant challenges in delivering such sites with a number being noted as undevelopable over the plan-period at this time. For instance, we would draw attention to the

Arpley Meadows and Central Park areas of the 'Masterplan Area', which are collectively identified for 2,263 dwellings as follows:

- SHLAA 1541: 646 houses (first houses delivered 2027/28)
- SHLAA 1633: 1,105 houses (first houses delivered 2027/28)
- SHLAA 1715: 250 houses (first houses delivered 2020/21)

2.28 The SHLAA assessments for each of these three sites confirms that there are fundamental delivery issues with further investigatory works required in terms of ground conditions, site access, hazardous installations, infrastructure, amenity issues in terms of surrounding land uses and ownership and tenancy. Parts of the sites in question fall within Flood Zones 2/3 meaning that residential development, which is particularly vulnerable to flooding, may not be compatible on large parts. This raises serious question marks over the suitability of including any of the sites within the Land Capacity Study in the first instance. Notwithstanding our concern about the very risk of non-delivery or slippage, none of these three sites could be delivered within the short-term.

2.29 The site with the earliest anticipated delivery timescale is '1715' relating to Spectra Building and Drivetime Golf Range. Notwithstanding the general deliverability issues summarised above, this specific site is wholly dependent upon the delivery of a new bridge over the River Mersey. Although it is understood that funding may be forthcoming for the bridge, there remain very complex land ownership issues to resolve. It is understood from a recent Warrington Council Executive Board meeting (October 2016) that initial discussions with the relevant landowners are only now taking place and that it is likely that the Council will need to utilise its Compulsory Purchase powers with the potential for very lengthy delays. There has already been significant slippage in the delivery of this scheme with planning permission for the bridge in question having initially been anticipated for January 2016 with full acquisition of all of the necessary land by December 2016.

2.30 The delivery of the two remaining sites at Arpley Meadows identified above is reliant upon the delivery of further, uncommitted bridges over the River Mersey. It is understood that the costs associated with the delivery of the necessary bridges would exceed £100m. Aside from the unknown nature of the bridge infrastructure required, the delivery of these sites is even made complex by the significant number of landowners involved and the site being intersected by the West Coast Mainline and the Arpley Chord.

2.31 Even on the basis of the Council's optimistic assumptions, the SHLAA confirms the following number of houses over the plan-period up to 2037:

- SHLAA 1541: 522 houses 2027/28 – 2036/37
- SHLAA 1633: 522 houses 2027/28 – 2036/37
- SHLAA 1715: 250 houses 2020/21 – 2024/25

2.32 Notwithstanding the Council's optimistic assumptions about delivery rates, the above totals 1,294 dwellings over the plan-period meaning that the urban land capacity for Warrington identified by the Council should be reduced by 969 across these three sites alone. It is also highly unlikely that multiple housebuilders would be delivered such high numbers of houses on sites adjacent to one another within this part of the housing market.

2.33 We have general concerns about a lack of critical analysis of the sites within the SHLAA anticipated to come forward for development. There remain optimistic and unjustified lead-in times and build rates, in terms of past rates identified at Appendix 4 of the SHLAA, and there does not appear to be allowance for demolitions/clearance based upon historic trends.

2.34 The Urban Capacity Study must acknowledge that the reliance upon sites within the inner areas of the Borough, many of which have fundamentally deliverability issues, risks: a) significant slippage or non-delivery over the plan-period; b) not enough sites cannot be delivered within the short-term in order to boost housing land supply in accordance with the Framework; c) such a strategy would fail to meet the Borough's housing and economic needs generally as discussed elsewhere. The number of dwellings that must be identified within the Green Belt is therefore much greater than that suggested through the Urban Capacity Study.

Question 6 - Do you consider that Green Belt land will need to be released to deliver the identified growth?

2.35 Yes.

2.36 It is apparent from the evidence base that a significant amount of Green Belt will now need to be released in order to meet the objectively assessed housing and employment needs. This need provides the exceptional circumstances required for Green Belt release.

- 2.37 The Green Belt in Warrington has not been reviewed in full for a significant period of time, during which development needs have not been met and adverse housing market signals have been allowed to perpetuate.
- 2.38 Paragraph 84 of the Framework requires that when drawing up or reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.
- 2.39 In the case of Warrington, there would be very significant adverse social and economic consequences of not providing sufficient land to meet the objectively assessed needs. Warrington's neighbours (such as Cheshire East and Cheshire West) have recently prepared their own Local Plans, including Green Belt release, and are unlikely to be in a position to meet any of Warrington's need. Therefore it is apparent that the Green Belt around Warrington will need to be comprehensively reviewed and redrawn to provide land for development.
- 2.40 It appears that our view above is aligned with the Council. However where we take issue with the consultation paper is the quantum of Green Belt release required. The Scope and Contents document indicates that land for approximately 5,000 dwellings will need to be found in the Green Belt. For reasons set out elsewhere within these submissions, we consider that this figure substantially under-estimates the amount of land that will need to be released from the Green Belt.

Question 7 - Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?

- 2.41 Whilst we agree that the matters identified are the main issues, we consider that they necessitate a full review of the Local Plan. The amount of land required for housing and employment goes to the very heart of the Local Plan, and has wide ranging implications for the vast majority of its policies.

Question 8 - Do you agree that further land will need to be removed from the Green Belt and safeguarded for future development needs beyond the plan period?

2.42 Yes.

2.43 Paragraph 83 of the Framework requires that when Green Belt boundaries are established or reviewed, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

2.44 Paragraph 85 states that when defining boundaries, local planning authorities should where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. They should also satisfy themselves that Green Belt boundaries will not need to be reviewed at the end of the plan period.

2.45 Therefore national policy is clear on the need to provide for safeguarded land. In Warrington, it is clear that the borough will continue to be a focus for development, and it is therefore critical that sufficient safeguarded land is provided to meet needs stretching well beyond the period.

2.46 How much safeguarded land is needed in practice was considered in detail at the Cheshire East Local Plan examination, which is now reaching its final stages. In summary, sufficient safeguarded land should be provided to ensure that the current requirement could be carried forward to the next plan period (i.e. 2037 to 2057) without the need for Green Belt release. In practice the minimum requirement is to provide a similar amount of safeguarded land to the amount of Green Belt being released for development in this plan period. Ideally more should be provided, to allow flexibility for higher growth and to increase the permanence of the Green Belt.

Question 9 - Do you consider it appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Local Plan review?

2.47 Yes.

2.48 These matters are integral to the plan and should be considered together. For example, there may be conflict between mineral protection policies and releasing land for development. Furthermore, if Green Belt land needs to be released to meet the needs for housing and employment land, it is entirely possible that Green Belt land will also be needed to meet the needs of gypsies and travellers. It would be inappropriate to review the Green Belt now, and potentially have to release further Green Belt land in the future.

Question 11 - Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?

2.49 No.

2.50 It is considered that there should be further stages and options in the event of the answer to *"has sufficient additional capacity been identified within the existing urban area and green field sites outside of the Green Belt to meet development needs?"* being 'yes'. The key question of *"are there exceptional circumstances to justify the release of Green Belt land?"* should be considered even if the answer is yes. There is an overarching need to provide the right housing type and distribution of housing for the borough, and the distribution should not be completely led by the supply.

2.51 In order to achieve the best possible outcomes, the process should be changed from the current iterative process to a more responsive model that takes the need to deliver the right type of housing in the right locations into consideration throughout the entire process. A key example of why the suggested methodology does not work can be seen in the relationship between the boxes entitled *"confirm preferred spatial distribution"* and *"assessment of individual site"*. These issues should be interrelated, as an assessment of individual sites could lead to a further review of spatial distribution once all constraints are identified. The proposed methodology does not allow for this.

Question 12 - Do you agree with the assessment of Local Plan Policies at Appendix 1?

2.52 We consider that a full review of the Local Plan is required. The amount of land required for housing and employment goes to the very heart of the Local Plan, and has wide ranging implications for the vast majority of its policies.

Question 13 - Do you consider the proposed 20 year Local Plan period to be appropriate?

- 2.53 We consider the proposed 20 year plan period to be appropriate in this instance. There may be significant slippage in the preparation and adoption of this plan. It is therefore prudent for the authority to extend the usual timeframe of 15 years to 20.

Question 14 - Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?

- 2.54 We consider that details of the housing land supply and trajectory should be included. It will be critical that the plan can deliver a 5 year supply, and a supply of housing land across the plan period. The plan will also need to have flexibility built in, which in practice means allocating significantly more land than the minimum requirement.
- 2.55 This completes our representations from a strategic perspective. We now submit specific sites for consideration as part of the the call for sites exercise.

3. Call for Sites submissions

Disused railway line, north of Station Road, Latchford

- 3.1 The proposed development site forms part of the former Warrington and Altrincham Junction Railway that was in operation from 1 November 1853 to 7 July 1985.
- 3.2 The site forms a raised linear strip of land located to the north of Station Road and Woolacombe Close and can be divided into three distinct areas (see the site location plan at **EP1** and the concept layout plan at **EP2**). The embankment comprises semi-natural woodland, scrub, semi-improved grassland, continuous bracken, tall ruderals, ephemeral/short perennials, introduced shrubs and invasive plant species (Japanese knotweed). In many places the old railway line and rail infrastructure are still evident.
- 3.3 Area 1 is the central area between Wash Lane and Knutsford Road and crosses Grammar School Road by way of a sandstone bridge. To the north of the central section of the site is Sir Thomas Boteler High School. The playing fields of which adjoin the embankment and are

identified in the Unitary Development Plan (UDP) as an Urban Green Space. To the south Cantilever Gardens, a modern residential development of 2 and 3 storey apartments buildings adjoins the site. The remaining boundaries with Station Road comprise vacant land and scrub. Area one extends to approximately 2.55 hectares.

- 3.4 Area 2 is the western section of the site to the north of Woolacome Close (made up of predominately 2 storey housing) and is bounded to the north by further residential development in Blackly Close and Our Lady's Primary School. Area 2 extends to approximately 1.21 hectares.
- 3.5 Area 3, the eastern section, extends to approximately 1.1 hectares and forms an area of land east of Knutsford Road to the north of residential development in Mersey Path and south of mixed residential and commercial development on Dover Road and Belmont Close.
- 3.6 The total site area detailed on the attached site location plan extends to approximately 4.86 hectares.
- 3.7 Whilst part of the former line between Latchford and Broadheath now forms part of the Trans Pennine Trail this land is disused, has no formal public access and does not contain any public rights of way.

Proposed use

- 3.8 The site is being promoted for a mixed use development, incorporating residential development of up to 280 dwellings and mixed commercial uses. A concept layout plan is appended at **EP2**.
- 3.9 The proposals involve the development of the 3 separate parcels of land independently in a character and form best suited to its surrounds whilst delivering a cohesive area of high quality mixed residential and commercial development across the site as a whole.
- 3.10 Area 1 is proposed to accommodate the highest density of development in keeping with the surrounding development to the south at Cantaleiver Gardens and has capacity to accommodate in the region of 100 apartments, 1950sqm of commercial space as well as a small number of terrace and mews properties. Access to this area would be taken from Station Road.
- 3.11 Area 2 is considered to lend itself to more traditional 2 storey development in the form of approximately 50 semi-detached dwellings with access taken from Wash Lane.

- 3.12 Area 3 would gain access via an existing vacant site on Dover Road and would again be appropriate for a traditional form of development encompassing a mix of two storey semi-detached and terrace properties; as well as the number off three storey apartments. This would reflect the character of the adjacent sites. The area is likely to be able to accommodate in the region of 50 apartments; 25 terraced properties and 20 semi-detached properties.
- 3.13 Each of the sites would also encompass public open space, landscaping and an appropriate level of car parking.
- 3.14 Initial ecological assessment of the site has identified it to be of value to the local area as a wildlife corridor as it provides a means of dispersal for many species between fragmented habitats. As such the development proposals would be designed to minimise the impact of the development by maintaining complete connectivity through the site and compensating for any loss to the width of the site by enhancing the retained areas for the benefit of wildlife.
- 3.15 Given the current raised nature of the site, in the form of an embankment ranging between 30 and 70 metres wide, in order to make the site developable there would be a degree of excavation and levelling required. The proposals include lowering the level of the embankment to varying degrees across the site to make it structurally sound and development at an appropriate level to be in keeping with its surroundings. The levelling of the site would involve both an element of 'cut and fill' on site from areas of embankment to areas of depression, as well as transportation of a percentage of the overburden off site. Any material transported off site would be reused as aggregate.
- 3.16 Initial pre-application discussions have taken place with the Local Planning Authority, and an EIA Scoping Opinion has been provided in advance of a future planning application. For reference a copy of our Scoping Report is appended at **EP3**. The intention is to submit an application for phase 1 of the development in 2017, with further phases to follow.

Planning considerations

- 3.17 The site is available now, and the proposed development is considered to be viable. The site is being actively promoted by ADS Estates, which is headed by a local entrepreneur and developer.

- 3.18 The site offers an opportunity to deliver up to 280 dwellings and other uses on land within the urban area. As such it could assist in minimising the amount of Green Belt land required in order to meet the objectively assessed development needs of the plan.
- 3.19 The site comprises previously developed land in a sustainable location. The majority of the land is not covered by any specific planning policy designation in the current UDP, other than being within the defined settlement limits. Therefore, in principle, the redevelopment of a previously developed site within the urban area should be acceptable.
- 3.20 There are potentially very significant regeneration benefits arising from the development of the site. The railway line and waterfront at Latchford is currently severely neglected and underused. It represents a major area of opportunity for enhancing the built environment and revitalising the local area through inward investment. The proposed redevelopment is capable of creating an attractive environment that can be enjoyed by residents and employees of Latchford.
- 3.21 The development could deliver significant transport and connectivity improvements. The current disconnect between Latchford and its neglected waterfront is largely due to the physical severance caused by the railway line and the bridges. The proposed development can bring about substantial physical regeneration, and help to reconnect Latchford with the waterfront. The removal of the bridges also offers the opportunity to improve the existing highways situation.
- 3.22 A number of site specific matters have been investigated, including trees and ecology. The site comprises a mix of semi-natural woodland, scrub, semi-improved grassland, continuous bracken, tall ruderals, ephemeral/short perennials, and introduced shrubs. It is acknowledged to be of significant value to the local area as a wildlife corridor. In order to minimise the impact of development on the railway corridor complete connectivity through the site would be maintained and compensation habitat for the benefit of wildlife would be created. The draft masterplan incorporates areas of open green space and wildlife habitat. Appropriate planting and management throughout the development would form part of the mitigation and enhancement package.
- 3.23 There are no designated assets (Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Registered Battlefields) within the site boundary. However

the railway bridge at Knutsford Road is noted in the Unitary Development Plan (Annex 10) as being a structure of local importance of architectural or historic interest. This bridge is proposed to be demolished as part of the proposed development. However the presently bridge acts to constrain highway flows in the local area and its removal could offer the opportunity to improve highway convenience and safety.

- 3.24 A number of Listed Buildings are located within 1km of the site boundary. However, these are all either within an urban context or far enough away from the site so that there is unlikely to be any impact upon their settings or significance.

Summary and conclusions

- 3.25 The site offers significant opportunities to bring this former railway land, which has remained unused for some 30 years, back into productive use to create an attractive and sustainably designed residential and commercial development within walking/cycling distance of local services and facilities. The development would also provide a sustainable source of recycled base material for use in construction throughout the local area.
- 3.26 The mixed residential and commercial development of the site will enable regeneration of this area and greater connectivity between Latchford and the canal and removing a significant physical barrier within the community. It would also help contribute to the Council's deliverable housing land supply and importantly the affordable housing needs of the Borough. It would also comply with the sustainable-led aims of the Government as set out in the Framework.

Land to the south of Lymm Road, Thelwall

- 3.27 This is a greenfield site located at the eastern edge of Thelwall, located within the Green Belt. A site location plan is appended at **EP4**.
- 3.28 The site is bounded to the west by existing residential development along Bell Lane as well as a boundary of existing vegetation. The eastern boundary is another linear line of vegetation beyond which lies an agricultural field. The southern boundary is Stockport Road. Finally, the site is bounded to the north by the B5157.
- 3.29 The site is approximately 3.36ha in area and is within the ownership of our client. The site is a vacant greenfield site. We are not aware of any constraints to development and the site is

available and suitable for residential development, in line with local and national planning policy. Only the existing Green Belt designation prevents the site coming forward now.

3.30 Paragraph 84 of the Framework states that when “*reviewing Green Belt boundaries, local authorities should take account of the need to promote sustainable patterns of development*”. It is our view that this site should be removed from the Green Belt due to its location, its minimal contribution towards protecting openness, and its sustainable attributes.

3.31 We have reviewed the councils Green Belt assessment (October 2016) and note that the site forms a small part of parcel WR32. This has been identified in the assessment as having a ‘strong contribution’ to the Green Belt. However, this conclusion is when assessing the parcel as a whole and our client’s site forms only a small section of that parcel. In our view this site makes a weak contribution to the Green Belt when considered on its own. This is assessed in against the Green Belt purposes below.

Check the unrestricted sprawl of large built-up areas

3.32 Parcel WR32 is identified in the Green Belt Assessment as making a strong contribution towards the prevention of urban sprawl, stating that:

“The boundary between the parcel and the built up area comprises Bell Lane which although is a durable boundary may not be permanently durable enough to prevent sprawl into the parcel in the long term, particularly given the existing sprawl. The parcel is only connected to the built up area along this western boundary. There is existing ribbon development along Bell Lane and Stockport Road and the parcel plays a strong role in preventing further ribbon development. Overall the parcel makes a strong contribution to checking unrestricted sprawl.”

3.33 In our view, the site represents a logical extension to the eastern settlement boundary of Thelwall. The site is bounded by existing permanent development to three sides, including residential development to the west and south. Whilst it is acknowledged that residential development of WR32 as a whole would have an impact relating to sprawl, it is considered that the development of our client’s parcel would not.

Prevent neighbouring towns from merging into one another

- 3.34 The development of the site would not in itself lead to neighbouring towns merging into one another. This is acknowledged in the Green Belt Assessment of WR32. The nearest settlement is some distance from the site and the bulk of the Green Belt would remain. The development of this site represents a logical rounding-off opportunity.

Assist in safeguarding the countryside from encroachment

- 3.35 There would be some encroachment but this must be considered in light of the housing need and the fact that releasing Green Belt is the only realistic option for meeting those needs. The site has clearly defined boundaries to the west, north and south. The development of the site would be well screened by existing residential development and would not appear as an intrusion into the open countryside. Countryside beyond would fulfil the safeguarding criteria.

Preserve the setting and special character of historic towns

- 3.36 This purpose is not applicable in this instance.

Assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 3.37 The Green Belt assessment states that the parcel known as WR32 makes a 'Moderate contribution' to this purpose. The assessment states that the Mid Mersey Housing Market has 2.08% brownfield urban capacity for potential development and therefore the parcel makes a moderate contribution. However, the release of Green Belt land will be essential to meeting the housing requirements of the borough. In our view the development of land north of Stockport Road would not conflict with this purpose. It would assist in urban regeneration by providing much needed housing to meet the needs of the borough. Furthermore, there is little if any tangible evidence that restricting development in the Green Belt actually results in previously developed land coming forward any quicker.

- 3.38 The 'Justification for Assessment' column in the assessment of WR32 states that:

"The parcel makes a strong contribution to one purpose, a moderate contribution to two, a weak contribution to one, and no contribution to one. In line with the methodology, professional judgement has been applied to evaluate the overall contribution. The parcel has been judged to make a strong overall contribution. The parcel has a strong role in preventing further ribbon development along Bell Lane and Stockport Road and the boundaries

between the parcel and the built up area are not permanently durable thus it has a strong role in checking unrestricted sprawl. The parcel therefore makes a strong contribution to fulfilling the fundamental aim of the Green Belt under paragraph 79 of the NPPF in protecting the openness of the Green Belt. The parcel makes a moderate contribution to safeguarding from encroachment and assisting in urban regeneration."

- 3.39 Parcel WR32 was therefore concluded to make a 'strong contribution' to the Green Belt.
- 3.40 The above conclusion relates to a large parcel and the land associated with our client represents only a small encroachment to that which has been assessed above. When taking the proposed site in isolation and having regard to the above comments, we conclude that it makes a 'weak contribution' to the Green Belt and would be a logical extension of the urban area by rounding off the existing Green Belt boundary.
- 3.41 The site is not physically constrained by flood risk, ecological issues or topography and has good access to Stockport Road to the south and the surrounding highway network; particularly the M6 a short distance to the east. The site is highly sustainable within walking distance of the centre of Thelwall. It is well related to local infrastructure and amenities.
- 3.42 The site is available and suitable for residential development but is not deliverable at this time due to the Green Belt policy designation. Removal of this site from the Green Belt would not harm the purposes of the Green Belt, and would provide a deliverable site for residential development which would contribute towards the Borough's housing requirement.

Land at Walton Lea Road, Stockton Heath

- 3.43 This is a greenfield site located at the western edge of Higher Walton which is in essence part of the Warrington Urban Area. However, it is located within the Green Belt. A site location plan is appended at **EP5**.
- 3.44 The site is bounded to the west by Walton Lea Road which also extends around the northern boundary. The eastern boundary is existing residential development accessed off Cranleigh Close and Hillford Crescent. The southern boundary is a canal. The site is effectively enclosed by existing permanent development on all sides.
- 3.45 In total the site is 3.03 hectares (7.50 acres) and is within the ownership of our client. The site is a vacant greenfield site. We are not aware of any constraints to development and the site is

available and suitable for residential development, in line with local and national planning policy.

- 3.46 However, the site is located in the Green Belt and is therefore currently not achievable. It is our view that the development of the site would not prejudice the objectives of including land in the Green Belt as defined in the Framework. The site is identified in the Green Belt Assessment (October 2016) as part of parcel WR63. We set out our analysis of the Green Belt assessment of the site below:

Check the unrestricted sprawl of large built-up areas

- 3.47 The Green Belt assessment identifies the site as making a 'moderate contribution' to this purpose. It is important to note that WR63 is also comprised of the land to the west of Walton Lea Road. Whilst the redevelopment of the entire parcel may have an impact in this respect, it is clear that the development of our client's site only most certainly would not. The site is adjacent to development to the east and north, and would represent a highly logical rounding off of the Green Belt boundary. The site is clearly defined by its strong boundaries.

Prevent neighbouring towns from merging into one another

- 3.48 The development of the site would not in itself lead to neighbouring towns merging into one another due to the particular characteristics of the site as set out above. This is confirmed in the Green Belt assessment's designation of 'weak contribution' to this purpose. The nearest settlement is some distance from the site and the bulk of the Green Belt would remain.

Assist in safeguarding the countryside from encroachment

- 3.49 The site is considered to make a 'strong contribution' to this purpose, stating that:

"The boundaries between the parcel and the built up area are not durable and would not prevent encroachment into the parcel. The parcel is only connected to the countryside along two boundaries. The boundaries between the parcel and the countryside consist of Walton Lea Road and the Bridgewater Canal which represent durable boundaries which could prevent encroachment beyond the parcel if the parcel were developed. The existing land use consists of open countryside. The parcel is flat with no built form and long line views thus it supports a strong degree of openness. Overall the parcel makes a strong contribution to

safeguarding from encroachment due to its openness and non-durable boundaries with the settlement.”

- 3.50 As stated in our analysis of purpose 1, the above conclusion relates to a large parcel and the land associated with our client represents only a small encroachment to that which has been assessed above. When taking the proposed site in isolation and having regard to the above comments, the site's clearly defined strong boundaries combined with having built development to the north, east and south clearly indicates that it has 'no contribution' or at most a 'weak contribution' to the Green Belt and would be a logical extension of the urban area by rounding off the existing Green Belt boundary. There would be some encroachment but this must be considered in light of the housing need and the fact that releasing Green Belt is the only realistic option for meeting those needs. The development of the site would be bounded by Walton Lea Road and would not appear as an intrusion into the open countryside.

Preserve the setting and special character of historic towns

- 3.51 This purpose is not applicable in this instance.

Assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 3.52 The Green Belt assessment states that the parcel known as WR32 makes no a 'Moderate contribution' to this purpose. The assessment states that the Mid Mersey Housing Market has 2.08% brownfield urban capacity for potential development and therefore the parcel makes a moderate contribution. However, the release of Green Belt land will be essential to meeting the housing requirements of the borough. In our view the development of land north of Stockport Road would not conflict with this purpose. It would assist in urban regeneration by providing much needed housing to meet the needs of the borough. Furthermore, there is little if any tangible evidence that restricting development in the Green Belt actually results in previously developed land coming forward any quicker.

- 3.53 The justification for the assessment of the site as making a 'strong contribution' states that:

“The parcel makes a strong contribution to one purpose, a moderate contribution to two, a weak contribution to one, and no contribution to one. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The parcel has been judged to make a moderate overall contribution as although it supports a strong degree of openness, the boundaries between the parcel and the countryside are

durable thus any development would be contained and would therefore not threaten the openness and permanence of the Green Belt. The parcel makes a moderate contribution to checking unrestricted sprawl and assisting in urban regeneration."

- 3.54 As stated above, this designation is wholly inappropriate for our client's site, particularly when assessed in isolation to the wider parcel to the west. It is a site bounded on multiple sides by existing residential development and it is a highly logical rounding off of the settlement boundary.
- 3.55 The site is not physically constrained by flood risk, ecological issues or topography and has good access to Walton Lea Road to the west and the surrounding highway network. The site is highly sustainable within walking distance of the centre of Stockton Heath. It is well related to local infrastructure and amenities.
- 3.56 The site is available and suitable for residential development but is not deliverable at this time due to the Green Belt policy designation. Removal of this site from the Green Belt would not harm the purposes of the Green Belt and would provide deliverable residential development which would contribute towards the Borough's significant housing requirement.

Land to the east of Hough's Lane, Stockton Heath

- 3.57 A site location plan is appended at **EP6**.
- 3.58 This site is largely greenfield but has a large residential dwelling within it. It is bounded to the west by Hough's Lane and has a clearly defined boundary comprised of trees and hedgerows along the northern, eastern and southern boundaries of the site. The parcel of land has been individually assessed as part of the Warrington Green Belt Assessment and is identified as parcel WR62.
- 3.59 We are not aware of any constraints to development and the site is available and suitable for residential development, in line with local and national planning policy. Due to its Green Belt location, it is currently not achievable, but this could be changed through an amendment to the Green Belt boundaries.
- 3.60 It is our view that the development of the site would not prejudice the objectives of including land in the Green Belt as defined in the Framework. We set out our analysis of the Green Belt assessment of the site below:

Purpose 1: to check the unrestricted sprawl of large built-up areas

- 3.61 The development of the proposed site for residential housing would not compromise this purpose. The council's Green Belt Assessment acknowledges this, stating that:

"The parcel only has a very limited connection with the built up area at its north eastern corner with the Bridgewater Canal. This represents a durable boundary which could prevent sprawl. Overall the parcel makes a weak contribution to checking unrestricted urban sprawl".

- 3.62 We agree that the site makes a weak contribution to this purpose due to the aforementioned durable boundaries. However, we disagree that the site has only a limited connection to the built up area to the north east. We consider the site to be a logical extension to the settlement boundary, particularly in the context of the possibility of parcels WR63, WR60 and WR61 coming forward for development.

Purpose 2: to prevent neighbouring towns merging into one another

- 3.63 The development of the site would not in itself lead to neighbouring towns merging into one another, and this is acknowledged in the Green Belt Assessment, which states that:

"The parcel forms a less essential gap between the Warrington urban area and Runcorn in the neighbouring authority of Halton whereby a reduction in the gap would slightly reduce the distance between the towns but would not result in them merging."

- 3.64 We agree with this assessment.

Purpose 3: to assist in safeguarding the countryside from encroachment

- 3.65 There would be some encroachment but this must be considered in light of the housing need and the fact that releasing Green Belt is the only realistic option for meeting those needs. The development of the site would be firmly enclosed by its physical boundaries, which as set out above are very clearly defined and extremely durable. However, the council considers it to make a strong contribution to this purpose, stating that:

"The parcel is very well connected to the open countryside along all its boundaries. The boundaries between the parcel and the countryside consist of Hough's Lane to the west which is a durable boundary, the Bridgewater Canal to the north which is a durable boundary, and dense wooded areas to the east and south which are durable. These

boundaries could prevent encroachment beyond the parcel if the parcel were developed. The existing land use consists of Beechtree Farm and open countryside. The parcel is flat with limited vegetation and long line views thus it supports a strong degree of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment."

- 3.66 This assessment is contradictory in that it acknowledges the site's clearly defined boundaries which would prevent further encroachment, and yet the site's contribution in this respect is assessed as 'strong'. It also states that the wooded areas along the boundary is "very dense", yet states that the parcel has "limited vegetation" which supports a strong degree of openness. It is considered that would be some encroachment but this must be considered in light of the housing need and the fact that releasing Green Belt is the only realistic option for meeting those needs. The development of the site would be bounded by the aforementioned strong boundaries, and for this reason would not appear as an intrusion into the open countryside as any development would be very well screened.

Purpose 4: to preserve the setting and special character of historic towns

- 3.67 This is not applicable in this instance.

Assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 3.68 The Green Belt assessment states that the parcel known as WR62 makes no a 'Moderate contribution' to this purpose. The assessment states that the Mid Mersey Housing Market has 2.08% brownfield urban capacity for potential development and therefore the parcel makes a moderate contribution. However, the release of Green Belt land will be essential to meeting the housing requirements of the borough. In our view the development of land north of Stockport Road would not conflict with this purpose. It would assist in urban regeneration by providing much needed housing to meet the needs of the borough. Furthermore, there is little if any tangible evidence that restricting development in the Green Belt actually results in previously developed land coming forward any quicker.

- 3.69 The justification for the assessment of parcel WR62 states that:

"The parcel makes a strong contribution to one purpose, a moderate contribution to one, a weak contribution to two, and no contribution to one. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The parcel has been judged to make a moderate overall contribution as although it supports a

strong degree of openness, the boundaries between the parcel and the countryside are durable thus any development would be contained and would therefore not threaten the openness and permanence of the Green Belt. The parcel makes a weak contribution to checking unrestricted sprawl and preventing towns from merging".

- 3.70 We broadly agree with the council's comments and we welcome the acknowledgement that the site's strong boundaries would result in a very contained development. However, we disagree that the site makes a 'moderate' contribution, as the council has not demonstrated sufficient justification for assessing the site's contribution to purpose 3 as 'strong.'
- 3.71 The site is not physically constrained by ecological issues or topography and has good access to Hough's Lane to the west and the surrounding highway network. The site is highly sustainable within walking distance of Lower Walton. It is well related to local infrastructure and amenities.
- 3.72 The site is available and suitable for residential development but is not deliverable at this time due to the Green Belt policy designation. Removal of this site from the Green Belt would not harm the purposes of the Green Belt and would provide deliverable residential development which would contribute towards the Borough's significant housing requirement.

Land to the south of Westbourne Road and west of Red Lane

- 3.73 A site location plan is appended at **EP7**.
- 3.74 The site is a greenfield site located to the south of residential development along Westbourne Road. It is bounded to the east by Red Lane and to the west and south by open fields which have also been assessed as part of the Green Belt assessment. We are not aware of any constraints to development and the site is available and suitable for residential development, in line with local and national planning policy.
- 3.75 However, due to its Green Belt location, it is currently not achievable. It is our view that the development of the site would not prejudice the objectives of including land in the Green Belt as defined in the Framework. We set out our analysis of the Green Belt assessment of the site below:

Purpose 1: to check the unrestricted sprawl of large built-up areas

- 3.76 The development of the proposed site for residential housing would not compromise this purpose. The site represents a logical rounding off of the settlement boundary and is adjacent to residential development on both its northern and eastern boundaries. It would not therefore represent unrestricted sprawl. The council's Green Belt Assessment acknowledges this, stating that:

"Given the shape of the built up area, development of the parcel (except for the western end) (alongside parcels WR57-61) could be seen as rounding off the settlement pattern"

- 3.77 We agree with the council's assessment in this instance.

Purpose 2: to prevent neighbouring towns merging into one another

- 3.78 The development of the site would lead to neighbouring towns merging into one another, and this is acknowledged in the Green Belt Assessment, which states that:

"No contribution: The parcel does not play a role in preventing towns from merging."

- 3.79 We agree with this assessment.

Purpose 3: to assist in safeguarding the countryside from encroachment

- 3.80 There would be some encroachment but this must be considered in light of the housing need and the fact that releasing Green Belt is the only realistic option for meeting those needs. The site has clearly defined, durable boundaries consisting of trees, a cemetery boundary and a golf course boundary. The council considers it to make a 'moderate' contribution to this purpose, stating that:

"The boundaries between the parcel and the built up area are durable to the north and could prevent encroachment however to the east they are not durable and would not be able to prevent encroachment into the parcel. The boundaries between the parcel and the countryside consist of the heavy tree lined cemetery boundary to the south east, and dense woodland to the west, both of which are durable boundaries. The southern boundary is less durable consisting of tree lining marking the golf course boundary. This less durable boundary may not be able to prevent encroachment beyond the parcel. The existing land use consist of

open countryside in agricultural use including a farm. There is no built form and limited vegetation. The topography slopes downwards from south to north thus long line views from the settlement are hindered. The parcel supports a moderate degree of openness. Overall the parcel makes a moderate contribution to safeguarding from encroachment due to its openness and mostly durable boundaries."

- 3.81 We consider the site to make a 'weak contribution' to this purpose at best, and disagree with the council's view that the site boundaries are not durable. The site has existing residential development on two boundaries and its development for residential would represent a logical rounding off of the settlement boundary. Furthermore, its development would not have a significant impact on openness for this reason.

Purpose 4: to preserve the setting and special character of historic towns

- 3.82 This is not applicable in this instance.

Assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 3.83 The Green Belt assessment states that the parcel known as WR62 makes no a 'Moderate contribution' to this purpose. The assessment states that the Mid Mersey Housing Market has 2.08% brownfield urban capacity for potential development and therefore the parcel makes a moderate contribution. However, the release of Green Belt land will be essential to meeting the housing requirements of the borough. In our view the development of land north of Stockport Road would not conflict with this purpose. It would assist in urban regeneration by providing much needed housing to meet the needs of the borough. Furthermore, there is little if any tangible evidence that restricting development in the Green Belt actually results in previously developed land coming forward any quicker.

- 3.84 The justification for the assessment of parcel WR60 states that:

"The parcel makes a moderate contribution to two purposes, a weak contribution to one purpose and no contribution to two purposes. In line with the methodology, the parcel has been judged to make a moderate overall contribution. The parcel supports a moderate degree of openness and the boundaries between the parcel and the settlement and the parcel and the countryside are of mixed durability thus the parcel has a moderate role in safeguarding from encroachment. The parcel makes a weak contribution to checking

unrestricted sprawl given that development of the parcel (except for the western end) alongside adjacent parcels could be seen as rounding off the settlement pattern. The parcel makes a moderate contribution to assisting in urban regeneration".

- 3.85 We disagree that the site makes a 'moderate contribution' overall. However, we do welcome the acknowledgement that its development would represent a rounding off of the settlement boundary. We consider the site to make a 'weak contribution' overall. The site makes a 'weak' or 'no' contribution in terms of sprawl, encroachment and prevention of merging for reasons set out above.
- 3.86 The site is not physically constrained by ecological issues or topography and has good access to Red Lane to the east and the surrounding highway network. The site is highly sustainable within walking distance of Lower Walton. It is well related to local infrastructure and amenities.
- 3.87 The site is available and suitable for residential development but is not deliverable at this time due to the Green Belt policy designation. Removal of this site from the Green Belt would not harm the purposes of the Green Belt and would provide deliverable residential development which would contribute towards the Borough's significant housing requirement.

ADS Recycling, Camsley Lane, Thelwall

- 3.88 The site is a commercial waste recycling yard and transfer station operated by ADS Recycling. A site location plan is appended at **EP8**.
- 3.89 The site is bounded to the north by Camsley Lane, to the south by and west by open fields, and to the east by land adjoining further commercial development.
- 3.90 Over the years the existing use has been subject to various complaints from neighbouring residents. Although we maintain that the use of the site is fully lawful and that there is no evidence of harm to residential amenity, the redevelopment of the site would presumably be welcomed by the Council and local residents. However if the site is to be redeveloped for housing, it will be necessary to secure a suitable site for the relocation of the business. Our client is willing to work with the Council in order to identify and bring forward the new site.
- 3.91 The site (Camsley Lane) is wholly within the Green Belt and is therefore subject to Green Belt policy. It is approximately 1.2ha in area, and is capable of accommodating around 36 dwellings (based on 30 units per ha).

3.92 The site lies partly within Flood Zone 2. It is proposed that development would be limited to the parts of the site not at risk of flooding. Any potential contamination issues would be assessed and if necessary remediated. The site is reasonably accessible, in that it is located approximately 1.5km from Lymm and its associated infrastructure and amenities. It is also well connected to the M56 and M6 motorways. The site is wholly within our client's ownership, and is therefore available, suitable and achievable; and would contribute towards meeting the borough's housing requirement.

3.93 The site was not assessed as part of the authority's Green Belt Assessment. It is a brownfield site in a loose ribbon of residential development between Lymm and Thelwall. It is in an area that does not make a strong contribution to the purposes of the Green Belt as set out in the authority's assessment methodology. We address the proposed site's suitability for residential development in the context of each 'purpose' as set out in Section B1 of the Warrington Borough Council Green Belt Assessment below.

Purpose 1: to check the unrestricted sprawl of large built-up areas

3.94 The development of the proposed site for residential housing would not compromise this purpose. The site comprises previously developed land and its redevelopment for housing would not represent unrestricted sprawl.

Purpose 2: to prevent neighbouring towns merging into one another

3.95 The development of the site would not in itself lead to neighbouring towns merging into one another due to the particular characteristics of the site as set out above; namely that the site is already in use as a waste transfer depot. Thelwall is some distance from the site and the bulk of the Green Belt would remain.

Purpose 3: to assist in safeguarding the countryside from encroachment

3.96 There would be some encroachment but this must be considered in light of the housing need and the fact that releasing Green Belt is the only realistic option for meeting those needs. The development of the site would be firmly enclosed by its physical boundaries, and as set out above is already in commercial use.

Purpose 4: to preserve the setting and special character of historic towns

3.97 This is not applicable in this instance.

Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 3.98 The development of the site would assist in urban regeneration by transforming a brownfield site currently in a use that is perceived to negatively impact upon neighbouring amenity, into a residential use in keeping with the character of the local area.
- 3.99 It is considered that it would be in the authority's interest to identify potential sites to accommodate the relocation of the existing thriving business. The benefits of doing so are two-fold:
1. As stated above, the relocation of the business would remove a waste transfer station use and replace it with family housing in an authority with an identified acute need for housing.
 2. The relocation of the business would secure local jobs going forward as well as providing an opportunity for expansion.

Land north-west of Cherry Lane, Lymm

- 3.100 The site is approximately 3.2ha in area and is within the ownership of our client. It is a greenfield site currently used for residential, equine and agricultural purposes. A site location plan is appended at **EP9**.
- 3.101 The site is bounded by Cherry Lane to the south-east, and agricultural land to the north and west. An existing dwelling is located within the southern part of the site. The M6 and M56 junction is located to the south of the site, and can be accessed via Cherry Lane.
- 3.102 Our client's site is detached from the urban area and is not of a sufficient scale to comprise a strategic allocation in isolation. However, we understand that the Green Belt land to the north, north-east and west of the site is being promoted by other parties for development. Our client's land is available, and could come forward as part of a wider allocation for housing and/or employment use.
- 3.103 The site is not physically constrained by flood risk, ecological issues or topography and has good access to the surrounding highway network; particularly the M6 and M56 junction a short distance to the south. The site is available and suitable for residential development, in line with local and national planning policy. Only the existing Green Belt designation prevents the site coming forward now.

3.104 We have reviewed the councils Green Belt assessment (October 2016) and note that the site is forms a part of parcel LY26. This has been identified in the assessment as having a 'strong contribution' to the Green Belt. The 'Justification for Assessment' column in the assessment of LY26 states that:

"The parcel makes a strong contribution to one purpose, a moderate contribution to one and no contribution to three. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The parcel has been judged to make a strong overall contribution as it supports a strong degree of openness and there are nondurable boundaries between the parcel and the countryside therefore the parcel has a strong role in preventing encroachment into the open countryside. The parcel therefore makes a strong contribution to fulfilling the fundamental aim of the Green Belt under paragraph 79 of the NPPF in protecting the openness of the Green Belt."

3.105 Parcel LY26 was therefore concluded to make a 'strong contribution' to the Green Belt.

3.106 The above conclusion appears to be inconsistent with the assessment against the purposes, particularly in the context of the site being assessed as making 'no contribution' to three out of the five Green Belt purposes. We consider that it actually makes a 'weak' contribution to the Green Belt purposes overall.

3.107 We therefore propose that the site is released from the Green Belt and allocated for development as part of a wider allocation for housing and/or employment use.

4. Summary and conclusions

4.1 There is an acknowledged need to release Green Belt in the borough. However we consider that the Council has underestimated the amount of housing that needs to be delivered on Green Belt sites. Notwithstanding, the Council will need to ensure that the plan is flexible. In practice this means identifying a supply of housing significantly in excess of the minimum requirement, in order to provide sufficient contingency for the plan to deal with rapid change.

4.2 Our client has put forward a number of sites for development, including a site located within the urban area at Latchford, and a number of Green Belt sites. These sites are deliverable subject to a policy change, and it is considered that their allocation for development would represent sustainable development in accordance with the Framework.

5. Appendices

- EP1. Site location plan – Disused railway line, Latchford
- EP2. Concept layout plan - Disused railway line, Latchford
- EP3. Scoping Report - Disused railway line, Latchford
- EP4. Site location plan - Land to the south of Lymm Road, Thelwall
- EP5. Site location plan - Land at Walton Lea Road, Stockton Heath
- EP6. Site location plan - Land to the east of Hough's Lane, Stockton Heath
- EP7. Site location plan - Land to the south of Westbourne Road and West of Red Lane
- EP8. Site location plan - ADS Recycling, Camsley Lane, Thelwall
- EP9. Site location plan - Land north-west of Cherry Lane, Lymm