

27th September 2017

Warrington Borough Council
Planning Policy and Programme
New Town House
Buttermarket Street
Warrington
WA1 2NH

Dear Sirs

Representations to Preferred Development Option Regulation 18 Consultation
Broomedge, Lymm, Warrington

We have been commissioned on behalf of our client, [REDACTED] [REDACTED] [REDACTED] [REDACTED] to provide representations to the Regulation 18 Preferred Development Option Consultation. Whilst these Representations make some general comments on the overall strategy of the emerging Local Plan (Section One), we specifically focus on Broomedge, a village settlement located to the east of Lymm, Warrington in Section Two of these Representations.

The Council will recall that Pegasus previously wrote to the Council in April 2017, where we highlighted that Broomedge is a settlement that could accommodate a modest level of growth, which will assist in ensuring it remains a vital and viable settlement with a range of community facilities. We explain in these Representations how there remains to be a strong case for modest growth in Broomedge, especially in light of the large housing requirement stipulated in the emerging Local Plan.

These Representations make reference to the relevant provisions of the NPPF, and in particular the **NPPF's stance** on supporting rural communities, meeting housing needs and the approach to undertaking Green Belt reviews.

We also comment on the issues arising from **the Council's current Green Belt assessment** not reviewing a number of the settlements located within the Borough that are currently washed over by Green Belt. These comments reiterate our previous concerns raised to the Council in April 2017, and explain how the current approach is inconsistent with the NPPF. If the Local Plan proceeds on this basis, our view is that it would be deemed unsound. We therefore respectfully request that the **Council's consultants preparing the Green Belt review are instructed to look at this matter in detail**. Given the former UDP identified boundaries for these settlements, we do not consider this would be a significant undertaking but it does need to be formally addressed.

Section One: comments on overall Strategy of Preferred Development Option Plan

The client supports the proposed housing requirement of 1,113 homes per annum over the 20 - year period, as set out in paragraph 4.7 of the Regulation 18 document. We commend the Council for exceeding the OAN figure set out in the Mid Mersey SHMA, and seeking to meet the ambitious **jobs growth target set out in the Local Enterprise Partnerships' (LEP) Devolution Deal; which are considered achievable, given Warrington and the wider LEP's strategic position between the two major City Regions of Manchester and Liverpool**. This suggests a positively prepared plan that aligns job growth and housing need to boost housing supply, in line with the provisions of the NPPF.

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Despite being generally supportive of the proposed housing requirement and ambitious and positively prepared growth strategy, we have concerns regarding deliverability matters. Indeed, we express concerns that the Council will struggle to deliver their ambitious growth targets with the currently suggested approach to dispersing growth and deliverability assumptions.

Deliverability Concerns-Maximising Urban Capacity

The client fully supports the principle of maximising development in existing urban areas, as a means of promoting sustainable growth. However, we have significant concerns **with the Council's** calculations in this instance, in particular the levels of delivery anticipated in the first 10 years of the plan period.

The plan suggests a total urban capacity of 15,429 homes at paragraph 4.10, which is explained in the Urban Capacity Assessment Update 2017, where it is broken down as:

- 9,721 homes identified through the 2017 Strategic Housing Land Availability Assessment (SHLAA);
- 7,588 homes from the masterplanning work;
- 435 homes from small site allowance; and
- - 2,285 to avoid double counting between the SHLAA and masterplanning work.

Even with this deduction of 2,285, this assumes that land for over 5,300 new dwellings (over 20% of the planned total) which has not currently been put forward for residential development will become available during the plan period, based solely on its allocation in the plan. This seems hugely optimistic considering the large number of ownerships and the fact that several sites are already occupied with alternative uses, whilst others will only be unlocked through significant infrastructure investment.

It is also highly pertinent to note that this masterplanning capacity has increased by more than 50% from the 3,460 estimated at the Scope and Contents stage; whilst the SHLAA total has actually decreased by over 10% from 10,806 to 9,721, which casts further doubt on whether these figures are realistic.

What's more, 65% of the total urban capacity (9,985 of 15,429 dwellings) is expected to come forward within the first 10 years of the plan period, which again seems unrealistic, given the ownership, land use and infrastructure constraints set out above, as well as the other difficulties and delays associated with urban regeneration schemes (contamination etc).

Finally, the small site requirement is likely to include some double counting as opportunities for small sites coming forward will be greatly reduced in the last 5 years of the plan period given the comprehensive masterplanning and regeneration of urban areas planned for the first 15 years, which will clearly use up the vast majority of the urban land supply, and therefore such windfall is highly unlikely to continue at past rates.

Therefore, for the reasons set out above, we raise serious questions over the timescales and deliverability of 15,429 dwellings in the urban area during the plan period, which in turn raises concerns about how the proposed housing requirement will be met with the currently suggested approach to delivering growth.



Land requirements for homes and employment

The client welcomes the Council's inclusion of a backlog figure from their OAN since 2015, as even though this predates the plan period, it reflects the fact that they have not had a target in place since the Core Strategy was quashed in 2015 and that unmet need will have accrued in that period.

We also welcome the inclusion of a buffer in the total housing land requirement to provide flexibility as required by the NPPF. There are two main reasons for the inclusion of such a buffer. Firstly, the housing requirement is a minimum figure which Local Plans should seek to surpass, and this interpretation has been endorsed in numerous Local Plan examinations. Secondly, it is inevitable that some sites will either under-perform or fail to deliver during the plan period due to technical difficulties, planning delays or market pressure. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. Indeed, paragraph 47 of the NPPF confirms a buffer is necessary to 'provide a more realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land'.

This is particularly relevant in Warrington given there is significant emphasis placed upon 3 large growth areas: Waterfront, Garden City Suburb and South West Urban Extension; whilst many of the sites identified within the Council's Urban Capacity/ Masterplanning exercise have not actually been put forward for development by their owners, and some are in alternative use. In short, this does not provide a great deal of choice.

Therefore, it is our view that a 5% buffer is insufficient in this instance and should be increased. The Council justify it on the basis of their past delivery record, their commitment to development through the Warrington and Co Masterplanning exercise and the potential for Fiddlers Power Station to come forward. However, the emerging plan will require step change in delivery, and so past delivery cannot be relied upon, and nor can the masterplanning or the power station for the reasons set out above. Indeed, the Council already acknowledge a sizeable backlog in terms of their housing delivery since 2015 and this will continue until sites are released from the Green Belt, particularly given the adopted Local Plan has no housing chapter.

The past delivery rate is as follows compared to the Council's annual requirement of 1,113:

2011/2012	2012/2013	2013/2014	2014/2015	2015/2016
600 dwellings	647	693	687	595

In short, Warrington will have a record of persistent under delivery and will need to apply the NPPF 20% buffer.

Furthermore, the LPEG report to Government (dated March 2016) recommended a 20% buffer, and that is what has been added to employment land provision, so we would suggest a similar approach is taken with the housing requirement.

Adding the recommended 20% buffer to Warrington's net requirement of 22,260 (then adding the backlog) would require sites capable of delivering a total of **27,559 dwellings** (or 3,339 more than currently planned). **This suggested uplift in the housing requirement will lead to a need to re-assess the spatial distribution of growth across the Borough, including to rural settlements such as Broomedge, which have been hitherto largely ignored.**

High Level Spatial Options

Whilst the client has no particular comments in relation to the 3 high level options that have been chosen, we do have comments in relation to the omission of consideration of certain settlements within the Borough.

It is notable that Option 2 advocates the majority of Green Belt release adjacent to main urban area with incremental growth in outlying settlements. Whilst it is notable that the reference for incremental growth in outlying settlements does allow for growth to be dispersed to rural settlements as well, it is notable that the Council have not considered all settlements within the Borough, such as rural settlements like Broomedge. Table 22 confirms this, where only 7 outlying settlements are listed as being able to deliver an approximate Green Belt capacity of 1,190. There is a requirement to look at the needs of smaller villages too, including an assessment of whether **such villages should be inset within the Green Belt or washed over. The Council's evidence base** does not do this currently and it is suggested the exercise is undertaken before the Local Plan is submitted so as to avoid considerable delay in the process.

We therefore raise concerns regarding the omission of detailed assessments of small villages like Broomedge within the evidence base and indeed within the Regulation 18 consultation document.

Conclusions to Section One

Whilst the client is generally supportive of the Council's decision to adopt an ambitious housing target which is above their established OAN need, we have raised concerns regarding the delivery assumptions which underpin the suggested urban capacity figure. Additionally, we also point towards the need to apply a 20% buffer which will increase the housing requirement even further. The large housing requirement to be delivered across the plan period points towards a need for a dispersed approach to growth across the Borough, including towards small rural villages like Broomedge which have a capacity to deliver modest and sustainable level of growth. We raise **serious concerns with the Council's evidence base not addressing the requirement to look at the** needs of smaller villages too, including an assessment of whether such villages should be inset within the Green Belt or washed over. Accordingly, we urge the Council to take steps to rectify this matter, and explain the compelling case for doing so below.

Section Two-Broomedge, Lymm

This section explains the case as to why Broomedge is well placed to accommodate modest levels of growth. Additionally, we refer to the NPPF and best practice for Green Belt Assessments to advise the Council on future steps to overcome our concerns with certain elements of the current approach of the Local Plan and accompanying evidence base.

The Settlement

The village of Broomedge contains a population of less than 2,000 people (based on SOA Warrington 21F), which also includes some residential dwellings on the fringe of Lymm/Rush Green.

Properties range from large multi-bedroom detached dwellings, standard family homes and smaller post war, semi-detached homes.

The heart of the village contains a crossroads with the A56 (Higher Lane) running east/west and the B5159 (Burford Lane/High Legh Road) running north/south. Located on/adjacent to the



crossroad is a good sized, local convenience store/post office/hardware store (Costcutter / Post Office), a pub (Jolly Thresher), office space, and bus stops. Other services in the village include a further pub (Wheatsheaf Inn), Air Cadets Training Centre, an equipped play area, and a vehicle repair garage/petrol station albeit the latter is located just outside the Borough boundary.

The extent and frequency of bus services running through the settlement is good. Services include the 35, 43, 47, 191 and 289 which provide services to Lymm and Warrington, Altrincham, Northwich, High Legh, Little Bollington and Partington. Services to Lymm, Altrincham and Warrington run every hour during the day (10-5). Services to Northwich and High Legh are less frequent with 3 services running a day.

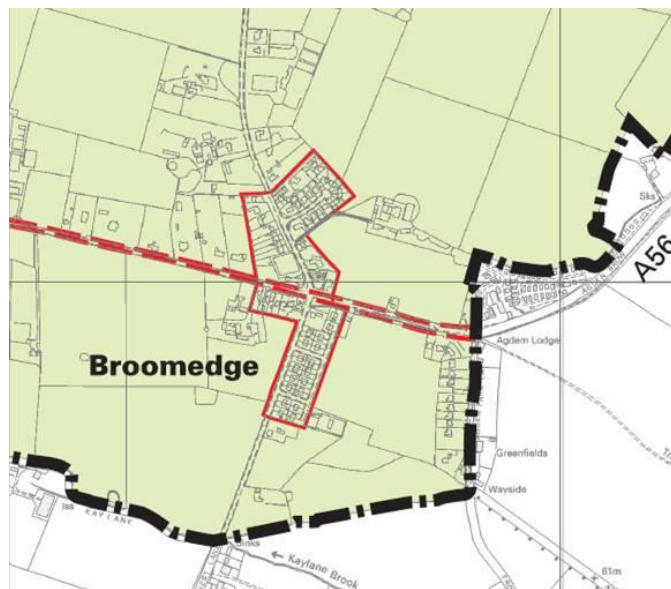
Planning Policy

Local Plan (Adopted)

The adopted Local Plan comprises of the unchallenged parts of the Warrington Local Plan Core Strategy, which was adopted in 2014.

The supporting Proposals Map illustrates that the settlement is washed over by Green Belt but there is also a defined settlement boundary from Broomedge, which does not include all of the dwellings and physical features within the settlement but the main core which runs along High Legh Lane and Burford Lane.

The extract below is from the former UDP proposals map but the boundary has not altered as part of the Core Strategy Local Plan. Indeed, with regard to villages that have been excluded and washed over by Green Belt, there has been no alteration to their status since the former UDP was adopted in 2006.



Policy CC 1 – Inset and Green Belt Settlements lists those settlements within the Borough that are inset (excluded) from the Green Belt and those that are washed over. Broomedge is one of 12 settlements that are washed over by the Green Belt, whilst a further 10 larger villages/towns are inset within the Green Belt (excluded). The policy goes on to note the following in relation to the washed over settlements:



'Within these settlements development proposals will be subject to Green Belt policies set out in national planning policy. New build development may be appropriate where it can be demonstrated that the proposal constitutes limited infill development of an appropriate scale, design and character in that it constitutes a small break between existing development which has more affinity with the built form of the settlement as opposed to the openness of the Green Belt; unless the break contributes to the character of the settlement.'

The supporting text to Policy CC 1 clarifies that this approach was adopted on the basis of seeking to control the spatial distribution of development across the Borough. Indeed, Paragraphs 17.3 and 17.4 state the following:

'With regards to the Countryside's constituent settlements, a distinction has been made between those which are regarded as 'Inset' settlements (that are excluded from the Green Belt) and those that are regarded as 'Green Belt' settlements (that are washed over and within the Green Belt). Policy CC1 identifies which of the borough's settlements fall within each of the classifications and the Proposals Map identifies individual settlement boundaries.

The Overall Spatial Strategy sets out the quantity and distribution of development within the borough and directs growth towards the urban area of the town of Warrington. Policy CC1 helps to implement this approach by requiring development proposals to conform with Local Plan Core Strategy policy CS1 and specifically, with regards to Green Belt settlements, through guiding the scale and nature of development likely to be deemed appropriate in such locations. This approach alongside evidence which suggests that development opportunities within the countryside and its constituent settlements are limited, is such that any growth within these areas should be organic.'

As noted above, the commentary in paragraph 17.3 reflects a position that has simply been transferred from the former UDP (i.e. there has been no change in terms of which settlements fall within and outside the Green Belt since at least 2006). Moreover, the reason for retaining this distinction between the settlements was on the basis of a spatial strategy that continued to focus development towards Warrington. It was also in the context of a strategy that did not propose a review of the Green Belt across the Borough.

The housing requirements presented by the Council in the Submitted Local Plan equated to 500 dwellings per annum between 2006 and 2027. However, by 2012 a total of 5,075 dwellings had already been delivered, with completions in 2006 exceeding 1,362 and in 2007 over 1,500 dwellings where completed. Sufficient housing supply was available for the remaining requirement and Policy SN1 confirmed that 80% of new homes will be delivered on previously developed land within the Borough, with 60% in Inner Warrington and 40% in the suburban areas of Warrington and the **Borough's outer lying settlements. As such**, the Core Strategy planned for a reduced level of housing completions over the remainder of the plan period and it was deemed that exceptional circumstances did not exist to review the Green Belt.

The Inspector's report for the Core Strategy highlights that no Green Belt review was deemed necessary. In addition, there is no comment within the Inspectors report (and we are not aware of any evidence that was prepared) in relation to the role of each village in terms of their contribution to the role and function of the Green Belt. Put simply, a case for Green Belt review was never advanced by the Council and therefore there was very limited focus in relation to the needs of those settlements that fell within the Green Belt.

However, the housing policies of the Warrington Core Strategy Local Plan were subsequently challenged successfully through the Courts. As such, the housing policies of the Core Strategy are omitted from the adopted version of the plan, hence the Council progressing a new Local Plan, which this Regulation 18 consultation represents an important early stage of.

Local Plan (Emerging) and Associated Evidence Base

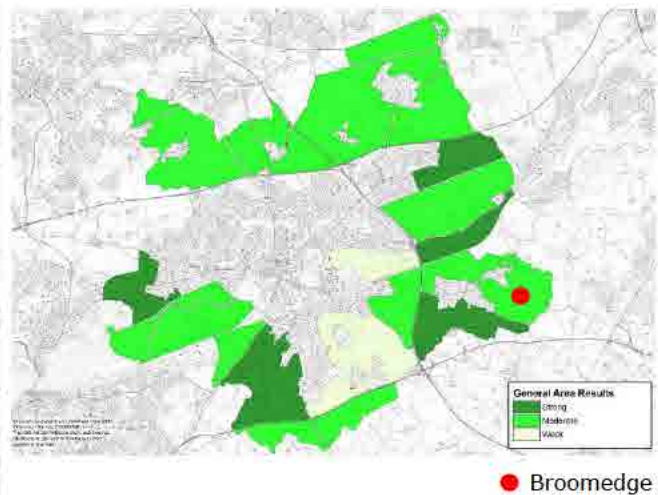
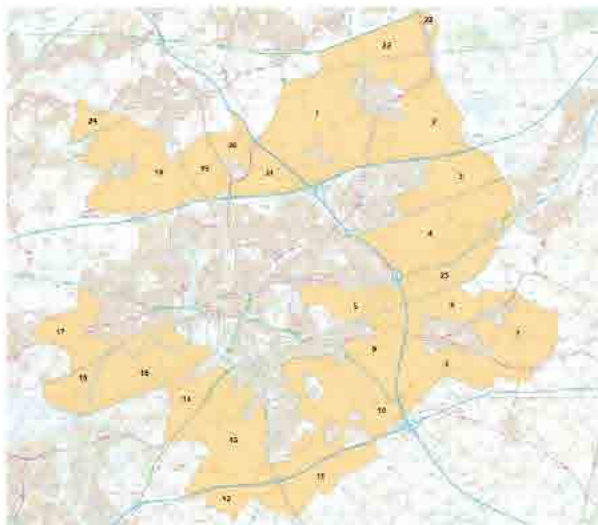
We have outlined our general comments in relation to the Regulation 18 consultation of the emerging Local Plan in Section One of these Representations. It is evident that the housing requirement to be met over the Plan Period is ambitious, and whilst much of the Local Plan proposes a different approach to the currently adopted Core Strategy to achieve this (i.e. green belt release), we still have concerns that the Green Belt Assessment and Review is not consistent with the NPPF- as explained below.

Green Belt Assessment

In April 2017, we set out comments to the Council in relation to the findings of the original Green Belt Assessment report which was produced in October 2016. We replicate these comments below.

Green Belt Assessment- original report 2016

The Council’s original Green Belt Assessment undertakes a high-level assessment of 23 large Green Belt parcels across the Borough. Broomedge is located within large parcel nos 7. That parcel has been ranked as making a ‘moderate’ contribution in terms of its function in relation to the 5 purposes of Green Belt by ARUP (see below).

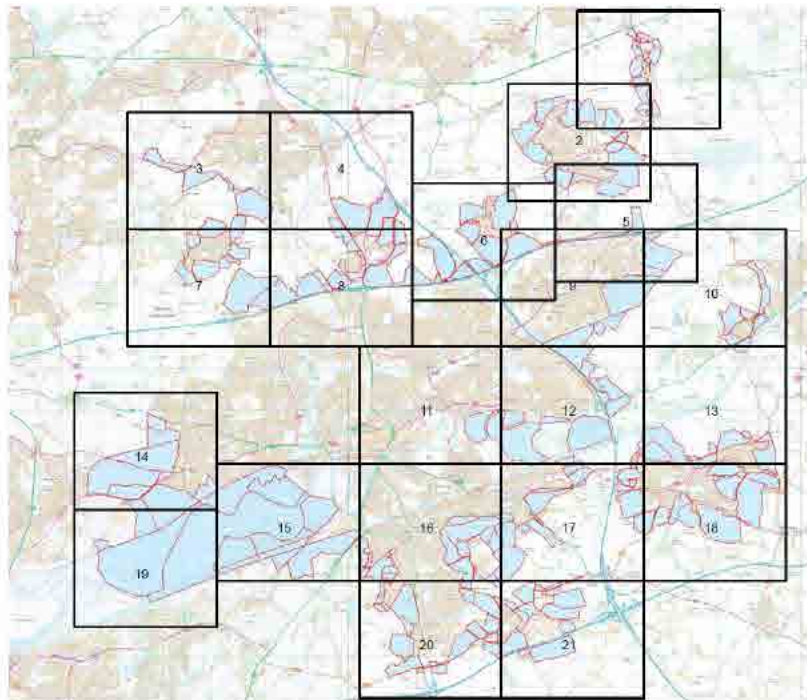


7.	No contribution. The GA is not adjacent to the Warrington urban area and therefore does not contribute to this purpose.	No contribution. The GA does not play a role in preventing town from merging.	Strong contribution. The GA is well connected to the open countryside given it is only connected to the inset settlement of Lynton along the western boundary. The boundary between the GA and the inset settlement consists of the limits of development which is not durable and may not be able to prevent encroachment. The boundary between the GA and the open countryside consists of the River Bollin, the A56, Spring Lane and field boundaries. Not all of these features are durable and may not be able to prevent encroachment in the long term. The existing land use predominantly consists of open countryside although includes the washed over village of Broomedge and Heatley as well as Lynton High School and Lynton Marina. The GA supports a moderate to strong degree of openness given that it has less than 20% built form and low levels of vegetation. Overall the GA makes a strong contribution to safeguarding from encroachment.	No contribution. Lynton is a historic town however the GA is over 2.5km from Lynton Conservation Area. The GA does not cross an important viewpoint of the Parish Church.	Moderate contribution. The Mid Mersey Housing Market Area has 2.06% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	The GA makes a strong contribution to one purpose, a moderate contribution to three. Professional judgement has been applied and the GA has been judged to make a moderate contribution overall to the Green Belt. While the boundaries between the GA, Lynton and the open countryside are weak and would not prevent the town from encroaching into the countryside, the GA contains a considerable amount of development including two washed over villages. This compromises its openness and means that the GA does not contribute to the Green Belt in a strong and undesirable way as would be required to make a strong contribution overall. The GA also does not prevent urban from merging, does not check unrestricted sprawl as it is not adjacent to the urban area and does not preserve historic towns as it is not close to the Lynton Conservation Area.	Moderate contribution.
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Notably, Arup highlight that the parcel makes no contribution to 3 of the 5 purposes. The 5th purpose which relates to the contribution to the regeneration of Brownfield sites is applied at a moderate level to every parcel in Warrington.

The only strong contribution relates to purpose 4: safeguarding encroachment into the countryside. Even then, Arup consider the parcel makes a moderate to strong contribution and confirms the parcel includes a large amount of development including the two washed over villages of Broomedge and Heatley, indicating that even this purpose is compromised.

Arup go onto assess smaller parcels. However, this is only in relation to parcels surrounding Warrington and the inset villages (see below). No assessment is carried out in relation to Broomedge.



Green Belt Assessment- Addendum following Regulation 18 Consultation (June 2017)

The Addendum report to the Green Belt Assessment provides some amendments to the Green Belt findings in the October 2016 assessment, in light of some comments made in the previous Regulation 18 consultation. This includes consideration of the route of the HS2. Whilst Parcel 7 (in which Broomedge is located) is located in close proximity to the HS2 route, the report confirms that this general area parcel has not been re-assessed as part of this exercise. The findings in relation to general parcel 7 therefore remain the same as the October 2016 findings (as discussed above).

The Addendum also assesses all call for site submissions. Our client's land interest (on the southern edge of Broomedge) is classified as having a moderate contribution to the purposes of the Green Belt.

Whilst we welcome that the Addendum has clearly addressed some of the previous concerns raised, including that it has now assessed all call for site submissions which include parcels of land adjacent to **'washed' over settlements such as Broomedge, it does not address all concerns.** Notably, the Green Belt Assessment still fails to consider whether villages lying in the Green Belt should continue to be **'washed' over by the Green Belt, or whether there is scope for the settlement boundary to not be 'washed' over and the green belt designation to surround just the village boundary instead.** This is a fundamental concern that needs rectifying.

We respectfully request that this matter is fully addressed before the Local Plan is continued, in order for the plan to be consistent with the NPPF.

Requirements of the NPPF

At this point it is pertinent to highlight some key paragraphs in the NPPF in relation to the need to support rural communities and the approach to reviewing Green Belt.

With regard to supporting rural communities, paragraph 28 states the following in relation to the need to support growth in rural areas:

'Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- *promote the development and diversification of agricultural and other land-based rural businesses;*
- *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and*
- *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.'*



Paragraph 55 goes on to state:

'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside...'

In this case, we have already highlighted that Broomedge contains a number of key services. Clearly an element of growth would assist in ensuring these services continue to remain viable into the future, which is considered to be a key sustainability consideration.

Moreover, given that the Borough will now have to deliver a far higher level of housing over the entirety of the plan period than that envisaged as part of the Core Strategy, Broomedge could also represent a sustainable location to meet a modest element of this requirement.

The delivery of some market housing would also ensure that affordable homes could be provided for local people. Indeed, the growth of Broomedge in the past has included the delivery of Council housing and there may well be particular local needs within the village that need to be addressed. Indeed, this would be entirely consistent with Paragraph 54 of the NPPF which states:

'In rural areas....Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.'

We have also highlighted that Broomedge contains a good number of bus services providing sustainable connections to the main areas of service, employment and retail within the vicinity. Whilst those services will not be as regular as might be the case in larger settlements, paragraph 29 of the NPPF already recognises this dynamic and states:

'The Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.'

In light of this policy advice, the role, function and needs of the villages washed over by the Green Belt within the Borough should not be ignored. Indeed, the delivery of further residential **development in the village would not represent 'isolated homes in the countryside'** and would help to assist meeting a modest level of housing need in an entirely sustainable manner.

Green Belt policies in the NPPF are not a blockade to such an approach. Paragraph 85 confirms that when reviewing Green Belt boundaries, Local Authorities should **'not include land which it is unnecessary to keep permanently open'**. Moreover, Paragraph 86 clearly states the following in relation to villages within the Green Belt:

'If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.'

This was a new policy requirement introduced by the NPPF which requires an assessment of villages within the Green Belt in terms of their contribution to openness. As noted above, no such

assessment was carried out in relation to the adopted Core Strategy, nor is it currently being progressed in the evidence base for the emerging Local Plan (Green Belt Assessment).

Broomedge Green Belt Boundary

In the case of Broomedge, we would accept that parts of the village display elements of openness that could be said to contribute to the openness of the Green Belt. For example, the fields that separate the properties fronting Agden Park Lane and those on High Legh Lane/Park Road create a sense of openness.

However, as previously noted each of the villages (including Broomedge) already have defined boundaries as set out on the Core Strategy Proposal Map. In the case of Broomedge, this boundary focuses on the core of the village which is not open and comprises a level of density and development that warrants its exclusion from the Green Belt. Indeed, as part of the emerging Local Plan, Arup have already concluded that Broomedge and Heatley represent built form that impacts on the openness of the Green Belt already and therefore there is a strong case that those villages should be omitted from the Green Belt.

At the very least, those areas defined on the adopted Proposals Map should be omitted from the Green Belt based on this policy advice and assessment. However, the NPPF points to the need to carry out a specific review of each settlement and each village will have evolved (however slightly) since the boundaries were first defined as part of the UDP in 2006.

In the case of Broomedge, our client would seek, as a minimum, to have their property (purple area below) included within the existing settlement boundary. The property is situated directly on the edge of the currently defined boundary and the property has been subject to sizable extensions since 2006 linking the main house with the formerly separate converted barn/garage building to the rear. There may be other similar instances/examples elsewhere on the edge of the defined boundary that now need to be reconsidered/included.

For instance, we are aware of an approved application for 14 houses to the north of the village at Willpool Nurseries and Garden Centre on Burford Lane, reference: 2015/26642. This application demonstrates the village is changing and expanding and supports our view that this village should be reviewed, not be washed over by the Green Belt, and represents a sustainable location for continued and additional modest growth.



Relevant Examples undertaken by other Local Authorities

We believe the approach we have set out above would be consistent with Green Belt reviews carried out elsewhere. Those that we are familiar with include Tandridge, Guildford and Runnymede (see links below).

- <http://www.tandridge.gov.uk/Planning/planningpolicy/emergingpolicy/technicalassessments.htm>
- <http://www.guildford.gov.uk/newlocalplan/gbcs>
- <https://www.runnymede.gov.uk/article/11311/Green-Belt-Review>

Guildford

Pegasus Group was instructed by Guildford Borough Council to prepare a Green Belt and Countryside Study to inform their new Local Plan. Paragraph 1.4 of the summary document states:

'In June 2012, further work was instructed by the Council relating to whether villages should be 'inset' or 'washed over' by the Green Belt designation and the identification of Green Belt boundaries relating to the villages as required. This element of the Study was instructed in specific response to revised national guidance issued on the matter within the National Planning Policy Framework (March 2012).'

The methodology followed for the inseting of villages and defining Green Belt is as set out below:

- Stage 1: Assessing the degree of openness within each village through analysis of village form, density and extent of existing developed land;
- Stage 2: Assessing the village surrounds and locations of potential Green Belt defensible boundaries surrounding each village across Guildford Borough;
- Stage 3: Assessing the suitability of each village for inseting within the Green Belt and defining new Green Belt boundaries.

In short, it was necessary to carry out an assessment of each village within the Green Belt before the Council could finalise their spatial strategy and Local Plan.

Runnymede Council

As part of Runnymede's Council's evidence base for the Local Plan, the Council appointed Arup to review Green Belt boundaries in Runnymede, who we note have been appointed for Warrinton's assessment.

Two phases of Green Belt Review work have been undertaken; the first of which was a strategic level review in 2014, followed by a more finely grained assessment of land within defined buffers of the Borough's urban settlements in 2017. To complement the Arup review of the Green Belt a further review was undertaken by the Council to consider whether villages lying in the Green Belt should continue to be 'washed over' included by the Green Belt or excluded and returned to the settlement.



This was in direct response to the requirement set out in paragraph 86 of the NPPF. A Stage 1 review of Green Belt Villages considered which developed areas of Runnymede lying within the **Green Belt could be considered as a 'village' and if so, whether they** should remain in the Green Belt or be excluded and returned to settlement, based on the tests of open character and openness.

Summary

The examples above clearly demonstrate that other local authorities are correctly following the NPPF requirements when assessment Green Belt boundaries in relation to their Local Plan production. **Indeed, Warrington's appointed consultant** for their own Green Belt Assessment (Arup) are familiar with the methodology to use for assessing whether villages should continue to be **'washed over'**, as demonstrated in the Runnymede Council example.

At present, this is a process which has not been undertaken by Warrington Council, as the assessment of villages washed over by Green Belt has not taken place. As such, the Local Plan cannot be considered to be sound.

We therefore urge the Council to instruct their consultants to undertake this process as part of the next stage of the Green Belt Assessment, to ensure compliance with the NPPF and to ensure that the supporting evidence base is sufficiently robust to advance to the latter stages of the Local Plan process.

Conclusion

Section One of these Representations explain how we are generally supportive of the overall strategy suggested in the Warrington Local Plan Regulation 18 consultation. Indeed, the Council are commended on their approach to adopt an ambitious housing requirement which goes above and beyond their established OAN. Despite this, we express concerns regarding deliverability assumptions and also suggest that a 20% buffer is applied which will generate an even higher housing requirement. This in turn points to a need to re-look at how growth will be distributed across the Borough, including towards rural villages such as Broomedge.

The large housing requirement which will need to be delivered across the plan period is becoming increasingly clear. Despite this large requirement, based on the evidence prepared to date, we consider the Council have largely ignored the rural settlements located within the Borough. We accept such settlements will not accommodate significant levels of development. However, it is equally vital that rural communities contribute to the objectives of sustainable development. Indeed, the lack of any growth will lead to stagnation and ultimately loss of services and would therefore run counter to the objectives of the NPPF.

The Council are already aware of our previous representations in relation to Broomedge, most notably expressed in a letter in April 2017. Section Two of these representations express much of a similar sentiment to the comments previously raised, and are considered even more pertinent now that the significant housing requirements to be delivered over the emerging plan period have become clearer.

There has been a continued failure for the Green Belt Assessments, a fundamental part of the evidence base, to consider whether **villages lying in the Green Belt should continue to be 'washed over'**. This is a fundamental concern that must be rectified to ensure compliance with the NPPF.

Importantly, in advancing the Local Plan, the Council have to consider a range of options to deliver the increased housing and employment needs of Warrington over the next 20 years. This is

specifically stipulated by the SEA Directives, which require all reasonable alternatives to be explored. In this context, we would advocate that reasonable alternatives would include those set out in the NPPF. Paragraph 84 of the NPPF is particularly pertinent in this respect and states:

'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.'

It is therefore clear that the NPPF requires a broad range of spatial distribution patterns to be tested. However, before the above process can be carried out, the Council need to set out the following in relation to the evidence base:

- Review the Green Belt boundaries around the villages currently washed over by the Green Belt in line with paragraphs 85 and 86 of the NPPF; and
- Consider the needs of villages within the Borough in terms of ensuring local needs are addressed and rural communities are able to continue to rely on the services that they currently benefit from in line with paragraph 54 and 55 of the NPPF.

In carrying out this additional work, we believe there are strong arguments and facts that would lead to Broomedge being identified as a village settlement that can be omitted from the Green Belt (with the precise boundaries to be defined) and that some moderate additional growth would help meet local needs and support/sustain existing services within the local community.

We trust the above information is useful and we would very much welcome the opportunity to meet with officers to discuss this further.

Yours sincerely

