

## EllisWilliams Architects

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

Warrington Local Plan Review
Preferred Development Option Regulation 18 Consultation July 2017

Ref/Marketing

28/09/17

Dear Sirs,

Following detailed consideration of the Regulation 18 Consultation of the Warrington Local Plan Review, we wish to make the following representation:

As architects of the Lymm Water Tower, we are deeply concerned at the proposal to remove the area of land adjacent to this major landmark from the Green Belt.

Both the Arup Green Belt Assessment of 2016 (Parcel LY22) and the Warrington Green Belt Assessment 2017 (Parcel R18/076) identified the parcel of land in question as providing a 'strong contribution' to the Green Belt. The fundamental aim of Green Belt Policy is to 'prevent urban sprawl by keeping land permanently open'.

Whilst not disputing the assessment and need for new housing in the Lymm area, it is our contention that only in truly exceptional circumstances land deemed to provide a 'strong contribution' to the Green Belt be considered for removal from the Local Plan, making way for potential new development. We fail to see in this context how the above land in question might justifiably be deemed 'appropriate'.

In addition, the National Planning Policy Framework makes it clear that the significance of heritage assets can be 'harmed through development within their setting'.

It is in this context, and as architects of the Water Tower redevelopment, we object strongly to the proposed removal of this land from the Green Belt and its release for residential development. The Water Tower is one of only a few significant historic landmarks within the Lymm area and as such constitutes a major element in townscape terms.

We are reminded of the particular attention afforded by English Heritage during the conversion of the Water Tower to the importance of this Grade II Listed Landmark. The interest given not only to the design of the Tower but its impact on its setting formed a key aspect of the design response. Views both too and from the Tower were seen as critical in maintaining its integrity and in respecting its importance as a key feature in the Lymm landscape.

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The Tower received numerous design and conservation awards including an RIBA Award for outstanding design and in recognition of its contribution to the local built environment. Any residential development on the land in question would have a hugely negative impact on this unique Listed building.

To conclude, we consider the 'strong contribution' made by the land in question to the Green Belt and the potential visual impact on the historic Water Tower should this be removed from the Local Plan to be totally unacceptable. We contend that this is contravention of both NPPF Policy and Warrington Borough Council's own Green Belt Assessment criteria for justifying removal of land from Green Belt for development purposes. We would urge the Council to ensure this area of land remains within the Green Belt for the mutual benefit of the people of Lymm, in recognition of the Water Tower's heritage value and the significant role played by this unique building in townscape terms.



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