



27/09/17

Subject: LOCAL PLAN CONSULTATION: CHALLENGE TO RECLASSIFICATION OF GREENBELT PARCEL LY21 & OBJECTION TO RELEASE OF GREENBELT PARCEL R18/111

Dear Sir/Madam,

We directly quote from Warrington Borough Council's own website.

"In January 2016, Ove Arup and Partners (Arup) were appointed by Warrington Borough Council (WBC) to undertake a Green Belt Assessment for the local authority area of Warrington designated by Green Belt.

*The aim of this Green Belt Assessment was to provide the Council with an **objective, evidence-based and independent assessment** of how Warrington's Green Belt contributes to the five purposes of Green Belt set out in national policy."*

A pre-cursor to the appointment of Arup, was a public and comprehensive procurement process undertaken by Warrington Borough Council. This involved several other interested organisations "bidding" to win and secure this piece of consultancy work. At the end of a rigorous procurement process Arup were selected. Arup are a global organisation, with over 13,000 specialists, across over 90 disciplines and operate in over 35 countries. They are experts in the area of planning policy.

I was notified by a member of WBC's Planning Policy Department, that over an eight month period (January 2016-October 2016) Arup specialists visited all of the greenbelt sites throughout the borough and assessed each individual greenbelt parcel using five separate measurements of how STRONGLY each greenbelt parcel contributed to national policy. They undertook this OBJECTIVELY, using local evidence and provided the council with a final INDEPENDENT assessment.

The Green Belt parcel of land with Map reference LY21 was assessed and classified by Arup as making a STRONG contribution *"to fulfilling the fundamental aim of the Green Belt under paragraph 79 of the NPPF (National Planning Policy Framework) in protecting the openness of the Green Belt. The parcel has a strong role in preventing encroachment into the open countryside"*

The proposed development submitted by Indigo Planning, Parcel reference R18/111 on behalf of the landowners, completely refutes Arup's assessment of the parcel of land, it's states that the parcel should be reclassified to WEAK. The general public should be aware that Indigo Planning are NOT INDEPENDENT, they ARE NOT OBJECTIVE and they HAVE A VESTED INTEREST. Indigo Planning pride themselves on achieving planning approval for developers, their website states "we have a success rate second to none"

The report and development proposal that Indigo Planning have submitted contains inaccuracies, is misleading and disingenuous.

MIS-LEADING, INCOMPLETE AND INACCURATE APPLICATION FORM

As an example, in the "CALL FOR SITES REGISTRATION FORM", section 6 SITE CONDITION, Indigo Planning state that 100% of the land is vacant and inactive and have left blank the PREVIOUS USES section and DATE(S) LAST USED section. I can categorically state that the fields bordering HIGHER LANE have been ACTIVELY used for agricultural purposes for the past 10 years, horses, sheep, cattle [REDACTED]

[REDACTED] and ANNUALLY the fields bordering HIGHER LANE have been GROWN, HARVESTED and BALED for hay.

THE PARCEL OF LAND HAS BEEN ACTIVELY FARMED FOR THE PAST TEN YEARS

What is of course interesting is the fact that since the appointment of Indigo Planning the fields have suddenly become inactive. I would urge the council to investigate this particular point of Indigo Planning's proposal. The facts are very clear, in that Indigo Planning, have INACCURATELY completed the REGISTRATION FORM, and MISLEAD the officers of the council and the general public in submitting this proposal. Furthermore, I would urge the council to investigate, on an evidence-based basis the actual agricultural activity that the fields and farm buildings along HIGHER LANE have been put to, over a more representative period of time (circa 10-20 years).

Through significant public funding, Arup were INDEPENDENTLY appointed, have undertaken an OBJECTIVE and INDEPENDENT assessment and we cannot foresee any reason why this assessment of land Map Reference LY21 should be reversed or amended.

Summary Of Assessment for Green Belt Map reference LY21 from the Arup report (October 2016)

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 to moderate degree of openness and there are non-durable 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

Furthermore I would challenge any change to the classification of LY21, based on the following that ARUP appear to have overlooked.

THE BENEFICIAL USE OF THE PARCEL OF LAND HAS NOT BEEN CONSIDERED WHEN CATEGORISING THE PARCEL

Parcel LY21 has in excess of three beneficial uses : 1) a cricket ground, 2) sports playing fields and 3) access to the open countryside and Helsdale Wood. Throughout Arup's assessment of each parcel of GREEN BELT, beneficial uses have been used to positively contribute to the GREEN BELT strength of a parcel and it's classification. Why have these beneficial uses been overlooked for parcel LY21?

INCONSISTENT APPLICATION OF PLANNING POLICY RELATIVE TO "BUILT DEVELOPMENT" CALCULATIONS

Parcel LY21 has included both the Lymm High School site and the two farms along Higher Lane. These have been included and classified as part of "built development". Both the High School and the two Farms should be excluded from the LY21 parcel assessment. There is no prospect that the High School will be demolished and used for housing and the two farms along Higher Lane are original agricultural buildings, an integral part of the GREENBELT and should not be entered into the calculation of "built development". Indigo Planning are also stating these buildings are no longer "active", but we have seen from the evidence above that they have been active.

Can we therefore urge the council and Arup to review these technical points and subsequently re-classify LY21 to STRONG CONTRIBUTING GREENBELT, or alternatively exclude the High School and Farms buildings along Higher Lane from the LY21 parcel, which in effect would automatically lead to a re-classification to STRONG. Arup's original classification was STRONG and it's summary stated that : *"the (LY21) parcel has a strong role in preventing encroachment into the open countryside"* - nothing has changed from this original view.

We look forward to hearing your response.

Rgds

