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**WARRINGTON**  
Borough Council

# **Warrington Borough Council**

## **Local Plan**

### ***Preferred Development Option***

### **Regulation 18 Consultation**

### **Standard Response Form**

**July 2017**

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## 1: Contact Details (Compulsory)

Title:

First Name:

Last Name:

Organisation (if applicable): Paul Butler Associates

Address: 31 Blackfriars Road, Salford, M3 7AQ.

ON BEHALF OF:

Phone Number:

E-mail:

**Which best describes you?** (tick ✓ one option only)

Resident in Warrington

Resident from outside of Warrington

Business

Other, please specify

## 2: Questions

### Question 1

Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

**Response:** Please refer to supporting representation attached

## Question 2

Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?

**Response:** Please refer to supporting representation attached

### Question 3

Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

**Response:** Please refer to supporting representation attached

#### **Question 4**

**Do you agree with the new Local Plan Objectives?**

**Response:** Please refer to supporting representation attached

## Question 5

Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

**Response:** Please refer to supporting representation attached



## Question 6

Do you have any comments to make about how we've assessed different options for the main development locations?

**Response:** Please refer to supporting representation attached

## Question 7

Do you agree with our Preferred Development Option for meeting Warrington's future development needs?

**Response:** Please refer to supporting representation attached

### **Question 8**

**Do you have any comments to make about our Preferred Development Option for the City Centre?**

**Response:** No comments

### Question 9

Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?

**Response:** No comments

## Question 10

Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?

**Response:** No comments

### **Question 11**

**Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?**

**Response:** Please refer to supporting representation attached

## Question 12

Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

**Response:** Please refer to supporting representation attached

### **Question 13**

**Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?**

**Response:** Please refer to supporting representation attached



## Question 14

Do you agree with our approach to providing new employment land?

**Response:** No comments

## Question 15

Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?

**Response:** No comments

## Question 16

Do you agree with our suggested approach for dealing with Minerals and Waste?

**Response:** No comments

## Question 17

Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?

**Response:** Please refer to supporting representation attached



# Paul Butler Associates

Planning, Development & Heritage Consultants

29 September 2017

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

16.1087Liii

Dear Sir / Madam

## **Representation on behalf of Stamford Property Holdings in response to the Local Plan Preferred Development Option Regulation 18 consultation**

### Introduction

This representation has been prepared by Paul Butler Associates on behalf of Stamford Property Holdings. The representation is submitted in response to the Local Plan Preferred Options Consultation and supporting evidence base.

The comments put forward in this representation support Stamford Property Holdings land interest for three sites adjacent to the existing settlement of Lymm. The sites known as 'land at Crouchley Lane', 'land at Longbutt Lane' and 'land at Stage Lane' are identified in Appendix 1.

The Council's Local Plan Preferred Options consultation does not specify individual sites within the outlying settlements (which includes Lymm) for allocation and release from the green belt. The allocation of sites has been reserved until the next consultation stage (submission version). To support the Council's consideration of the most appropriate sites for green belt release this representation is supported by a Development Brochure for each site which reflects on various technical studies carried out to date to present a framework vision for the sites going forward. The brochure draws upon the extensive survey and investigation work carried out to date to demonstrate to the Council that the sites are suitable for release from the green belt. The sites represent a deliverable source of housing land with no overriding constraints that would inhibit delivery.

Stamford Property Holdings are supportive of the Local Plan and its progression towards Submission. The remainder of this representation focuses on the aspects of the Local Plan which require greater consideration by the Council to ensure that the 'soundness' of the Plan is not undermined. The matters can be summarised as follows:

- Housing Requirement and Spatial Distribution
- Housing Delivery in the Outlying Settlements
- Green Belt Review Assessment

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## Housing Requirement and Spatial Distribution

The Local Plan presents a total requirement of 24,220 new dwellings to be delivered over the plan period. This equates to 1,113 new homes per annum over the 20 year period. The overall employment land target for the borough over this period is 381 hectares. The Preferred Options identifies a total urban capacity of 15,429 new homes based on the evidence in the 2017 SHLAA. This leaves a further 8,791 homes to be provided from land that is currently in the green belt.

To cater for this identified need the Preferred Options endorses a strategic approach to land release which predominately focuses on a Garden City suburb capable of accommodating 6,000 new homes and an urban extension to the south west of Warrington of up to 2,000 new homes. The remaining requirement is then distributed within the outlying settlements. The settlement of Lymm is identified as being capable of accommodating 500 new homes on land currently within the green belt.

Stamford Property Holdings are supportive of the increase in the housing requirement from that identified in the Issues and Options consultation but consider that the identified housing requirement does not go far enough. The scale of economic growth identified is not aligned with previous economic growth of the borough which would suggest that an increase in housing provision is still desirable.

In terms of the spatial distribution of the required housing. The Preferred Option outlines a capacity of 15,429 within the urban area, this would require the majority of the identified sites within the 2017 Strategic Housing Land Availability Assessment coming forward during the plan period. The assumption that this level of delivery will be achieved is problematic. To achieve a 100% implementation of all these sites is optimistic, some sites will inevitably stall and fail to come forward. The government's housing white paper (DCLG February 2017) comments that more than a third of new homes that were granted planning permission between 2010/2011 and 2015/16 have yet to be built.

The Preferred Spatial Option also relies on a small number of large strategic sites to deliver a significant proportion of the identified housing need. Such large strategic sites typically are complex to deliver with significant infrastructure requirements which can slow down delivery rates. The reliance of a small number of large strategic sites means it is unrealistic that the required levels of growth will be delivered. The Council's evidence base for the Local Plan in the 2017 SHLAA examines that past delivery rates are significantly below the anticipated 1,113 new dwellings per annum required. In fact, completions has only exceeded 700 dwellings per annum on one occasion in the last ten years. A preferred approach to housing delivery which focuses on a few complex large sites is therefore unrealistic if the Council are to achieve their strategic aims.

The Call for Sites exercise identified significant capacity within the green belt to deliver the required amount of homes. Stamford Property Holdings would therefore urge the Council to consider identifying a larger proportion of housing at sustainable settlements such as Lymm in order to achieve flexibility within the delivery of the Plan. The sites at Crouchley Lane, Lonbutt Lane and Stage Lane are all sustainable and accessible sites which can make a valued contribution to housing delivery.

## Housing Delivery in the Outlying Settlements

As evidenced above, a preferred approach which allocates only 500 dwellings to the settlement of Lymm is unlikely to support the long term housing needs of the borough. Furthermore in considering the sites to come forward for development, it is strongly recommended that a spatial focus on 3/4 + sites is employed rather than restricting growth by opting for one larger site. A spatial focus on a larger number of sites will allow a greater variety in choice to the local housing offer, create competition in the market and would assist with the Council achieving their five year housing supply targets. An alternative approach which focused on delivery through one large site represents a greater risk to housing delivery. As explained earlier in this representation, large sites are intrinsically more complex to deliver and the Council would be tied to working with one developer. Should development stall, this would curtail housing delivery and jeopardise the strategic aims of the Local Plan. An approach which focuses on just one larger development site will also offer little in terms of choice to the local housing market.

The sites presented by Stamford Property Holdings have an indicative capacity of 180 dwellings (land at Crouchley Lane), 180 dwellings (land at Longbutt Lane) and 16 dwellings (Stage Lane). The sites are within the ownership of one landowner and there are no technical constraints to development coming forward. The sites therefore represent a suitable and deliverable location for new development.

In terms of the consultation process, it is noted that the preferred options consultation does not present any substantial option for the outlying settlement rather it seeks to reserve the allocation of individual sites until the submission version of the Local Plan. This is typically the final version of the Plan which a Local Planning Authority seeks to submit for examination in public. To withhold the allocation of individual sites until this late in the consultation process allows limited scope for effective consultation and review, therefore undermining the transparency and soundness of the plan. We would therefore suggest that an additional stage of consultation is factored into the process prior to the submission version.

## Green Belt Review Assessment

Presently the settlement of Lymm is inset from the green belt with the village settlement boundary following the line of the existing built form. The Local Plan Preferred Options is supported by a green belt review (ARUP, 2016) which identifies the site at Crouchley Lane as forming part of parcel LY23 and the site at Longbutt Lane forming part of parcel LY19. The Stage Lane site is identified under parcel LY15.

Paul Butler Associates (representations, 2016) previously commented on the conclusions made within the green belt review and offered a revised green belt assessment for the Crouchley Lane and Longbutt Lane sites which more accurately reflected the status of the site.

### *Crouchley Lane*

Our assessment highlights that the parcel is adjacent to the existing settlement and bounded by strong physical features, including a main road and strong tree belt which provides a continual containment around the perimeter of the site. This would prevent any development within the parcel from encroaching beyond the parcel boundary into the open countryside in neighbouring

parcels, and hence if developed would be likely to have a minimal impact on the overall openness of the Green Belt. Since the previous representation, the land at Lymm rugby club has received planning permission for a major redevelopment which includes the provision of new homes in the green belt. This will have a significant impact on the assessment of this parcel reducing the contribution made under purpose 3 (to assist in safeguarding the countryside from encroachment). In terms of purpose 4 (to preserve the setting and special character of historic towns) the green belt review assessment adopts a generic approach whereby a site within 250 metres of a Conservation Area is deemed to make a strong contribution against this criteria. Defining 'setting' in heritage terms is much more complex than applying a figure and judging everything within the buffer in the same manner. Historic England have provided specific guidance on defining the setting of heritage assets (Planning Advice Note 3: The Setting of Heritage Assets), we would recommend that the setting of each site is reviewed on a case by case basis having regard to specialist advice. Paul Butler Associates (Planning and Heritage Consultants) have reviewed the setting of the designated heritage assets in proximity to the site and conclude that there would be no material impact on the setting of these assets. We therefore conclude that the site makes a weak contribution to the purposes of including land within the green belt. Further information in respect of the above can be found in the submitted Development Brochure, the previous 2016 representation is included in Appendix 2.

#### *Land off Longbutt Lane*

The site at Longbutt Lane is surrounded by built form on its western, southern and eastern boundaries. Our assessment (December, 2016) highlights that the surrounding built form results in the parcel having a limited degree of openness. The settlement of Lymm adjoins the parcel to the south and west and the built form of Lymm high School and residential properties on Oughtrington Lane adjoin to the east. Development within this parcel would infill this element of the settlement with negligible impact of the character and openness of the wider green belt and landscape. The supporting development brochure demonstrates how the site could be developed sensitively having regard to the surrounding context.

#### *Land off Stage Lane*

It is noted that the site is identified as making a weak contribution towards the purposes of including land within the green belt. We support the observations made in the green belt review in this respect.

#### Summary

Stamford Property Holdings submit that the sites at Crouchley Lane, Longbutt Lane and Stage Lane are suitable for release from the green belt within the next phase of the Local Plan consultation in order to meet the Councils objectively assessed housing need. This representation and the supporting development brochure demonstrates the suitability of the sites for new development concluding that there are no significant constraints to restrict development of the type identified coming forward in this location.

This representation also examines the Local Plan Preferred Option and highlights areas where further consideration is required in order to make the plan sound.



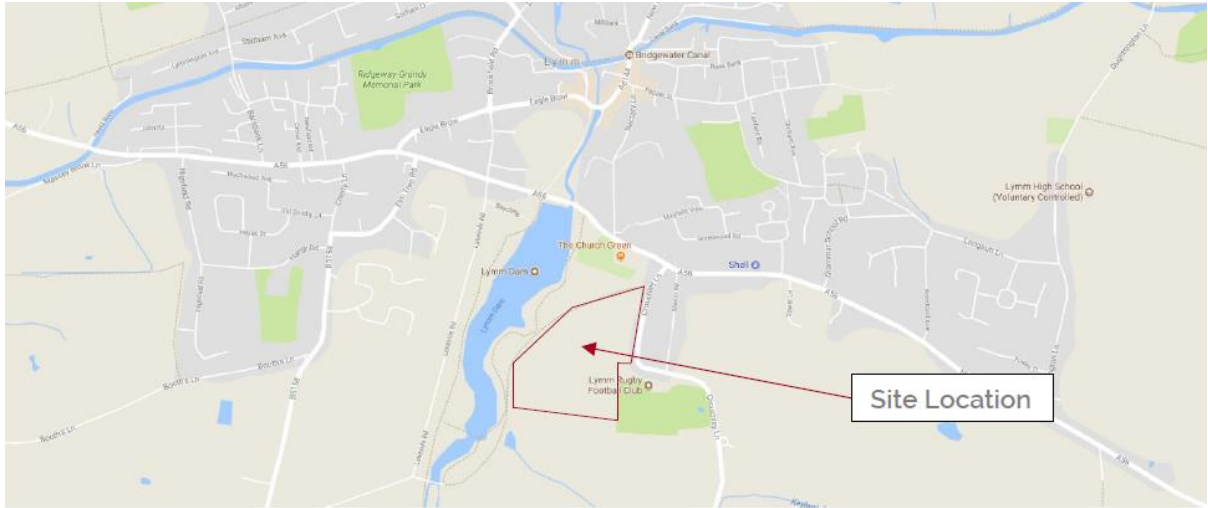
Stamford Property Holdings look forward to continued involvement within the Local Plan as the strategic options are developed.

Yours faithfully

**BSc (Hons) MPLAN MRTPI**  
*Senior Planner*

c.c

**APPENDIX 1: SITE LOCATIONS**



Land at Crouchley Lane



Land at Longbutt Lane



Land at Stage Lane

**APPENDIX 2: PREVIOUS REPRESENTATIONS, DECEMBER 2016.**



# Paul Butler Associates

Planning, Development & Heritage Consultants

05 December 2016

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

16.1087Li

Sent by email 05 December 2016

Dear Sir / Madam

## **Call for Sites Nomination and Local Plan combined response: Land adjacent to Lymm Rugby Club, Lymm**

I am writing on behalf of my client FH Cookson & Sons to nominate a site as part of the Local Plan Review Call for Sites exercise. This letter accompanies the completed 'Call for Sites Registration Form' dated 05 December 2016 and a Site Location Plan (Appendix A).

The nomination relates to an edge of settlement site forming land adjacent (west) to Lymm Rugby Club (*grid ref Easting: 368316 Northing: 386625*). The site is identified by the submitted Site Location Plan. The site is approximately 8 hectares in size and as part of this nomination, on behalf of my client FH Cookson & Sons, we suggest that the site could be used for new housing development. There are no significant constraints or designations affecting the future development of the site that could not be overcome during the design process. The site is considered to be a suitable location for residential development and could be achievable within 0-5 years.

The remainder of this letter examines the following to support our client's submission:

- The suitability of the site for removal from the green belt providing an assessment of the site and its performance against the five purposes of the green belt set out in paragraph 80 of the NPPF;
- An assessment of the site's performance against the sustainability appraisal objectives adopted by the Council as part of the Spatial Distribution and Site Assessment Process; and
- The deliverability of the site in the context of paragraph 47 of the National Planning Policy Framework.

## **Green Belt Removal**

Warrington Borough Council (WBC) appointed ARUP Consultants to provide a review of green belt boundaries (Green Belt Assessment October 2016). Whilst the overall methodology and approach of the green belt review would appear to be in accordance with best practice, the area based and site specific conclusions reached in the assessment, which are based on professional judgement, do not in all cases, in our professional opinion adequately reflect the contribution of certain sites in green belt terms. This is explored further below.

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Our clients interest at land adjacent to Lymm Rugby Club is included in General Area 8 and part of parcel LY23.

#### General Area Results and Parcel Identification

The identification of the general area parcels within the report is considered inadequate. The area of Lymm and Rush Green should be subdivided into further parcels in order to reflect recognisable and permanent boundaries. Parcel 7 for instance covers an area between Lymm and Rush Green which is divided by the Bridgewater Canal. It is submitted that this is a permanent and distinguishable boundary which separates two distinctly different areas.

Similarly, Parcel 8 extends from the south eastern edge of Lymm west towards the M6 with the A56 as the northern boundary. This area is vast and is divided by the local wildlife site of Lymm Damm which runs north – south from the centre of Lymm. This is a permanent and recognisable feature within the landscape. The land east of the wildlife site displays greater attachment to Lymm and is not appreciated as part of the same parcel as land to the west towards the M6.

The process of parcel identification is therefore not considered to be an appropriate basis for analysis and therefore undermines the subsequent assessment from the outset.

#### Performance of Parcel LY23 against green belt purposes

The Green Belt Assessment at Appendix G examines the contribution of smaller parcels of land against the five purposes of including land within the green belt. Parcel LY23 is identified within this assessment as having a moderate contribution.

We have reviewed this assessment and provide our own judgement, please refer to Appendix B.

Our assessment highlights that the parcel is adjacent to the existing settlement and bounded by strong physical features, including a main road and strong tree belt which provides a continual containment around the perimeter of the site. This would prevent any development within the parcel from encroaching beyond the parcel boundary into the open countryside in neighbouring parcels, and hence if developed would be likely to have a minimal impact on the overall openness of the Green Belt. We therefore conclude that the site makes a weak contribution to the purposes of including land within the green belt.

The site is also within a sustainable location in close proximity to local services and facilities in the town of Lymm.

#### **Performance of the Site against Sustainability Appraisal Objectives**

The Local Plan Scope and Content consultation establishes that the removal of land from the green belt will be required in order for the Council to deliver their objectively assessed housing requirement. Appendix 2 of the consultation document sets out WBC's site selection methodology. The green belt assessment is one part of this process, potential development sites will also need to be considered in terms of their performance against certain Sustainability Appraisal / Strategic Environmental Assessment objectives. These objectives are outlined in the SA Scoping Report which forms part of the consultation evidence base. The Scoping Report at



Appendix A provides a draft Site Appraisal Framework which the Council will use to consider the site's performance against key sustainability indicators.

Utilising this site appraisal framework, we provide an assessment of the site's performance against these key indicators. This is included at Appendix C to this letter.

The appraisal demonstrates that the site offers a sustainable and accessible location for new housing development. The site is approximately 1000metres from the centre of Lymm and benefits from good access to public transport infrastructure and local schools.

Where the appraisal identifies potential environmental effects it is considered that these can be mitigated as part of the design process and are not considered to be significant in terms of their magnitude. Our client would be happy to work with the Council and undertake further assessment work in relation to certain environmental issues if this is of assistance to the Council as part of the plan making process.

### **Delivery**

The National Planning Policy Framework requires that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable (*NPPF para 47, footnote 11*).

As evidenced in this submission, the site is available now offering a suitable location for new development. The site is considered to be a viable and realistic proposition that will make a significant contribution to housing delivery over the plan period. There are also no known constraints that would affect delivery of housing commencing on site within 5 years.

### **Summary**

In order for WBC to meet its objectively assessed housing need it is evident that sites will need to be removed from the green belt. The site adjacent to Lymm Rugby Club offers an attractive site for green belt removal due to its natural containment. The site is also highly sustainable and accessible and will allow direct access on foot for new residents to local schools and the town centre.

We trust that our comments will be taken on board during the site assessment process for the preferred options stage of the Local Plan. We would be happy to discuss the delivery of the site further with the Council if this is of assistance.

Yours faithfully

**BSc (Hons) MPLAN MRTPI**  
*Senior Planner*



## **Appendix A:** Land adjacent to Lymm Rugby Club: Site Location Plan



## **Appendix B:** Land adjacent to Lymm Rugby Club: Green Belt Assessment

**LY23 Parcel Assessment**

<b>Ref</b>	<b>Purpose 1: to check the unrestricted sprawl of large built up areas</b>	<b>Purpose 2: to prevent neighbouring towns merging into one another.</b>	<b>Purpose 3: to assist in safeguarding the countryside from encroachment</b>	<b>Purpose 4: to preserve the setting and special character of historic towns</b>	<b>Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land</b>	<b>Justification for Assessment</b>	<b>Overall Assessment</b>
LY23	No contribution: The parcel is not adjacent to the Warrington urban area and therefore does not contribute to this purpose.	No contribution: The parcel does not contribute to preventing towns from merging.	Weak contribution: The parcel is connected to the settlement on its eastern boundary and is well contained on the western and southern perimeters by a substantial tree belt which limits the degree of openness experienced. The durable boundaries of this parcel would ensure no encroachment into the countryside should this parcel be developed.	Moderate contribution: Lymm is a historic town. Whilst the site is not within the conservation area it is adjacent to it. Development on this site however could be brought forward without any material harm on the character and appearance of the conservation area.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	The parcel makes a weak contribution to one purpose, a moderate contribution to two and no contribution to two. Development within this parcel would be well contained having a minimal impact on the overall openness of the green belt.	Weak contribution

## **Appendix C:** Land adjacent to Lymm Rugby Club: SA Objectives Appraisal

### Land adjacent to Lymm Rugby Club, Lymm: SA Site Appraisal Framework

The appraisal utilising the following desk top data sources: Magic map; EA flood maps and ground water protection maps; Historic England list, Warrington Borough Council SA Scoping Reports (figure 3.6, 3.7, 3.9, 3.11).

A neutral effect option has been introduced into the assessment in order to realise the role that mitigation can play in the assessment process.

SA Objectives	Criteria	Likely Effect (Significant Positive / Positive / Neutral/ Negative / Significant Negative)	Comments
<b>Economy and Regeneration</b>			
Strengthen the local economy and ensure sustainable economic growth	EC1: Would site development lead to the loss of employment land?	Positive	The site is not allocated for employment use at present.
	EC2: Distance to Principal Road Network by vehicle	Significant Positive	The site is less than 1 mile from the principal road network.
Reduce poverty, deprivation and social exclusion and secure economic inclusion	EC3: How close is the site to key employment sites?	Positive	Significant employment opportunities within 1.2km – 3km from the site.
<b>Health and Wellbeing</b>			
Enable groups to contribute to decision making and encourage a sense of community identity and welfare.	HW2: Is the area supported by community facilities? ( <i>Village halls, places of worship, community centre</i> )	Positive	Facilities in Lymm town centre are within 1200m.
Provide, protect or enhance leisure opportunities, recreation facilities, green infrastructure and access to the countryside.	HW3: Access to local natural green space (ANGST). To what extent do the sites meet the following ANGST standards? 1. Natural greenspace at least 2 hectares in size, no more than 300 metres from home. 2. At least one accessible 20 hectare greenspace site within two kilometre of home.	Positive	Standard met. Natural greenspace at Lymm Damm is adjacent to the site and easily accessible on foot.
	HW4: Access to formal play	Significant positive	Site will be capable of supporting the provision of onsite facilities.



SA Objectives	Criteria	Likely Effect (Significant Positive / Positive / Neutral/ Negative / Significant Negative)	Comments
<b>Accessibility</b>			
Reduce the need to travel, especially by car, improve choice and the use of more sustainable modes.  Protect and enhance accessibility for all the essential services and facilities.	ACC1: How accessible is the site to the nearest primary school on foot?	Positive	Ravenbank Community Primary School is 1000 metres from the site.
	ACC2: How accessible is the site to the nearest secondary school?	Positive	Lymm High School is 1400 metres from the site.
	ACC3: How well served is the site by a bus service?	Significant positive	Regular bus services frequent the A56 which is less than 400 metres from the site.
	ACC4: How accessible is the site to the nearest train station?	Significant negative	Nearest train stations are over 5 km from the site however the accessibility of the site to local education facilities, bus services and services and facilities within Lymm town centre compensates for this likely effect.
	ACC5: What is the overall distance to a GP service or health centre?	Significant positive	The Brookfield Surgery is approximately 1100 metres from the site.
Ensure access to good quality, sustainable affordable housing.	HO1: To what extent will development help to meet housing needs? <i>Deliverability and scale</i>	Significant positive	Site is available for development within the next 5 years.
<b>Natural Resources</b>			
Ensure the sustainable and prudent use and management of natural resources including the promotion of natural resources including the promotion of sustainable drainage and water conservation.  Protect, manage and improve local environmental quality including land, air and controlled waters and reduce the risk of flooding.	NR1: What are the potential impacts on air quality?	Positive	The development is more than 1km from the AQMA associated with the M6.
	NR2: Could development of the site lead to the remediation of land potentially affected by contamination?	Significant positive	Whilst residential use would comprise a sensitive end use. The site is not thought to be contaminated given the limited historic use of the site, any contaminants present on site could be successfully mitigated through a remediation scheme.
	NR3: Would allocation of the site result in the loss of High Quality Agricultural Land?	Positive	Site contains less than 10 hectares of agricultural land 1-3.
	NR4: Does the site fall within a Groundwater Source Protection Zone, as identified by the environment agency?	Neutral	Part of the site falls within the outer zone 2. Whilst the appraisal indicators state this to be a negative effect this is in fact neutral. Protection measures can be incorporated into the scheme design

SA Objectives	Criteria	Likely Effect (Significant Positive / Positive / Neutral/ Negative / Significant Negative)	Comments
			to control surface water runoff into the ground. PBA have experience of this type of mitigation in other schemes.
	NR5: Is the site (or part of) within an identified flood zone?	Positive	Site is within flood zone 1.
	RU3: Is there potential for safeguarded or identified mineral reserves to be sterilised?	Positive	No effects anticipated - the site is not known to be within an identified area.
<b>Built and natural heritage</b>			
Protect and enhance places and buildings of historic cultural and archaeological value.	BNH1: Proximity to designated heritage assets: <i>Conservation Areas</i> <i>Nationally listed buildings</i> <i>Scheduled Ancient Monuments</i> <i>Registered Park or Garden</i>	Neutral	There are two grade II listed buildings immediately north of the site: Rivington cottage and the Church of St Mary the Virgin. A qualitative assessment such as a heritage statement will be submitted with any planning application submitted for the site. Identification and consideration of heritage issues from the outset of the masterplanning process in tandem with early and effective consultation with statutory and non-statutory bodies will ensure that no material harm to designated heritage assets will arise from development of the site.
	BNH2: Effects upon the significance and setting of heritage assets / the historic environment	Neutral	Through a sensitive design and materplanning process which considers the impact on heritage assets from the outset it is considered that the historic environment is unlikely to change from its baseline position.
Protect and improve the quality and character of places, landscapes, townscapes, and wider countryside whilst maintaining and strengthening local distinctiveness and sense of place.	BNH4: Capacity of the landscape to accommodate development, while respecting its character	Positive	Medium capacity. To be confirmed through landscape character assessment.

SA Objectives	Criteria	Likely Effect (Significant Positive / Positive / Neutral/ Negative / Significant Negative)	Comments
<b>Biodiversity and Geodiversity</b>			
Protect and enhance biodiversity and geodiversity	BG1: Could allocation of the site have a potential impact on a European Site SSSI, SPA or SAC	Positive	Outside catchment areas.
	BG1: Could allocation of the site have a potential impact on a SSSI	Positive	Over 400 metres from a SSSI.
	BG2: Could allocation of the site have a potential adverse impact on designated Local Wildlife Sites, Local Nature Reserve, RIGs, Potential Wildlife Sites or any other site of wildlife or geodiversity value such as Ancient Woodland (including where BAP species have been recorded.	Neutral	Adjacent to a local wildlife site (Lymm Damm). Phase 1 Extended Habitat Survey will inform masterplanning process and process of mitigation / offsetting (where relevant).
	BG3: What is the potential impact on TPOs.	Positive	Higher quality trees will be retained where possible. Significant new tree planting would be included within the scheme design.
<b>Climate change and resource use</b>			
Minimise waste and maximise reuse, recovery and recycling	RU1: Would allocation of the site result in the use of previously developed land?	Neutral	Site is predominantly greenfield. The objectively assessed need for Warrington states that the release of greenfield land will be necessary in order for Warrington to deliver the levels of housing required.
	RU2: Is there good access to a Household Waste Recycling Centre (HWRC)?	Positive	Woolston Recycling Centre and Stockton Heath Recycling Centre are both less than 10km from the site.



# Paul Butler Associates

Planning, Development & Heritage Consultants

05 December 2016

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

16.1088Li

Sent by email 05 December 2016

Dear Sir / Madam

## **Call for Sites Nomination and Local Plan combined response: Land north of Longbutt Lane, Lymm**

I am writing on behalf of my client FH Cookson & Sons to nominate a site as part of the Local Plan Review Call for Sites exercise. This letter accompanies the completed 'Call for Sites Registration Form' dated 05 December 2016 and a Site Location Plan (Appendix A).

The nomination relates to the site north of Longbutt Lane (*grid ref Easting: 369231 Northing: 386998*) which is identified by the submitted Site Location Plan. The site is approximately 10 hectares in size and as part of this nomination, on behalf of my client FH Cookson & Sons, we suggest that the site could be used for new housing development. There are no significant constraints or designations affecting the future development of the site for residential use and it is considered that such a development would be achievable within 0-5 years.

The remainder of this letter examines the following to support our client's submission:

- The suitability of the site for removal from the green belt providing an assessment of the site and its performance against the five purposes of the green belt set out in paragraph 80 of the NPPF;
- An assessment of the site's performance against the sustainability appraisal objectives adopted by the Council as part of the Spatial Distribution and Site Assessment Process; and
- The deliverability of the site in the context of paragraph 47 of the National Planning Policy Framework.

## **Green Belt Removal**

Warrington Borough Council (WBC) appointed ARUP Consultants to provide a review of green belt boundaries (Green Belt Assessment October 2016). Whilst the overall methodology and approach of the green belt review would appear to be in accordance with best practice, the area based and site specific conclusions reached in the assessment, which are based on professional judgement, do not in all cases, in our professional opinion adequately reflect the contribution of certain sites in green belt terms. This is explored further below.

Our clients interest at land to the north of Longbutt Lane is included in General Area 7 and specifically parcel LY19.

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### General Area Results and Parcel Identification

The identification of the general area parcels within the report is considered inadequate. The area of Lymm and Rush Green should be subdivided into further parcels in order to reflect recognisable and permanent boundaries. Parcel 7 for instance covers an area between Lymm and Rush Green which is divided by the Bridgewater Canal. It is submitted that this is a permanent and distinguishable boundary which separates two distinctly different areas.

Similarly, Parcel 8 extends from the south eastern edge of Lymm west towards the M6 with the A56 as the northern boundary. This area is vast and is divided by the local wildlife site of Lymm Damm which runs north – south from the centre of Lymm. This is a permanent and recognisable feature within the landscape. The land east of the wildlife site displays greater attachment to Lymm and is not appreciated as part of the same parcel as land to the east towards the M6.

The process of parcel identification is therefore not considered to be an appropriate basis for analysis and therefore undermines the subsequent assessment from the outset.

### Performance of Parcel LY19 against green belt purposes

The Green Belt Assessment at Appendix G examines the contribution of smaller parcels of land against the five purposes of including land within the green belt. Parcel LY19 is identified within this assessment as having a strong contribution.

We have reviewed this assessment and provide our own judgement below. Firstly we consider that this parcel boundary should be updated to reflect the call for sites submission which promotes the southern part of this land only. Please see attached location plan at Appendix A. Straight away it is evident that this new parcel is joined to surrounding built form on its western, southern and eastern boundaries. We have provided a revised assessment of this parcel in Appendix B, this concludes that the parcel makes a weak contribution to the purposes of including land within the green belt as defined by the NPPF.

The assessment highlights that the surrounding built form results in the parcel having a limited degree of openness. The settlement of Lymm adjoins the parcel to the south and west and the built form of Lymm High School and residential properties on Oughtrington Lane adjoins to the east. It is submitted that development within this parcel would effectively amount to infill development with negligible impact on the character and openness of the wider green belt. The masterplanning and design process would also allow for the durability of the northern boundary to be strengthened through the provision (for example) of a public footpath to complement the existing PROW and new tree and hedgerow planting.

As will be explored further in the following section, the location of the site adjacent to an existing High School and within 100 metres (on the north western boundary) of Ravenbank Primary School offers a highly accessible location for new development. This accessibility could be enhanced by the provision of a footpath on the northern boundary to strengthen connections with the existing settlement, linking through to Sutch Lane.

## **Performance of the Site against Sustainability Appraisal Objectives**

The Local Plan Scope and Content consultation establishes that the removal of land from the green belt will be required in order for the Council to deliver their objectively assessed housing requirement. Appendix 2 of the consultation document sets out WBC's site selection methodology. The green belt assessment is one part of this process, potential development sites will also need to be considered in terms of their performance against certain Sustainability Appraisal / Strategic Environmental Assessment objectives. These objectives are outlined in the SA Scoping Report which forms part of the consultation evidence base. The Scoping Report at Appendix A provides a draft Site Appraisal Framework which the Council will use to consider the site's performance against key sustainability indicators.

Utilising this site appraisal framework, we provide an assessment of the site's performance against these key indicators. This is included at Appendix C to this letter.

The appraisal demonstrates that the site offers a sustainable and highly accessible location for new housing development. The site occupies a unique position between Lymm High School and Ravenbank Primary School, furthermore the site is approximately 1000metres from the centre of Lymm and benefits from good access to public transport infrastructure.

Where the appraisal identifies potential environmental effects it is considered that these can be mitigated as part of the design process and are not considered to be significant in terms of their magnitude. Our client would be happy to work with the Council and undertake further assessment work in relation to certain environmental issues if this is of assistance to the Council as part of the plan making process. Our client also recognises the valuable role this site could play in supporting local school expansion alongside new, much needed residential development and would be willing to discuss such a development option further with the Council.

## **Delivery**

The National Planning Policy Framework requires that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable (*NPPF para 47, footnote 11*).

As evidenced in this submission, the site is available now offering a suitable location for new development. The site is considered to be a viable and realistic proposition that will make a significant contribution to housing delivery over the plan period. There are also no known constraints that would affect delivery of housing commencing on site within 5 years.

## **Summary**

In order for WBC to meet its objectively assessed housing need it is evident that sites will need to be removed from the green belt. The site at Longbutt Lane offers an attractive site for green belt removal due to its containment by built form on the west, south and east. Development here would amount to infill development rounding off the settlement of Lymm. The site is also highly sustainable and accessible and will allow direct access on foot for new residents to local schools and the town centre. Should the expansion of the primary school be desirable on our clients land

alongside new residential development, this would be an option that our client would be open to considering further as part of the plan making process. It is our view that such an arrangement would amount to very special circumstances to support green belt release.

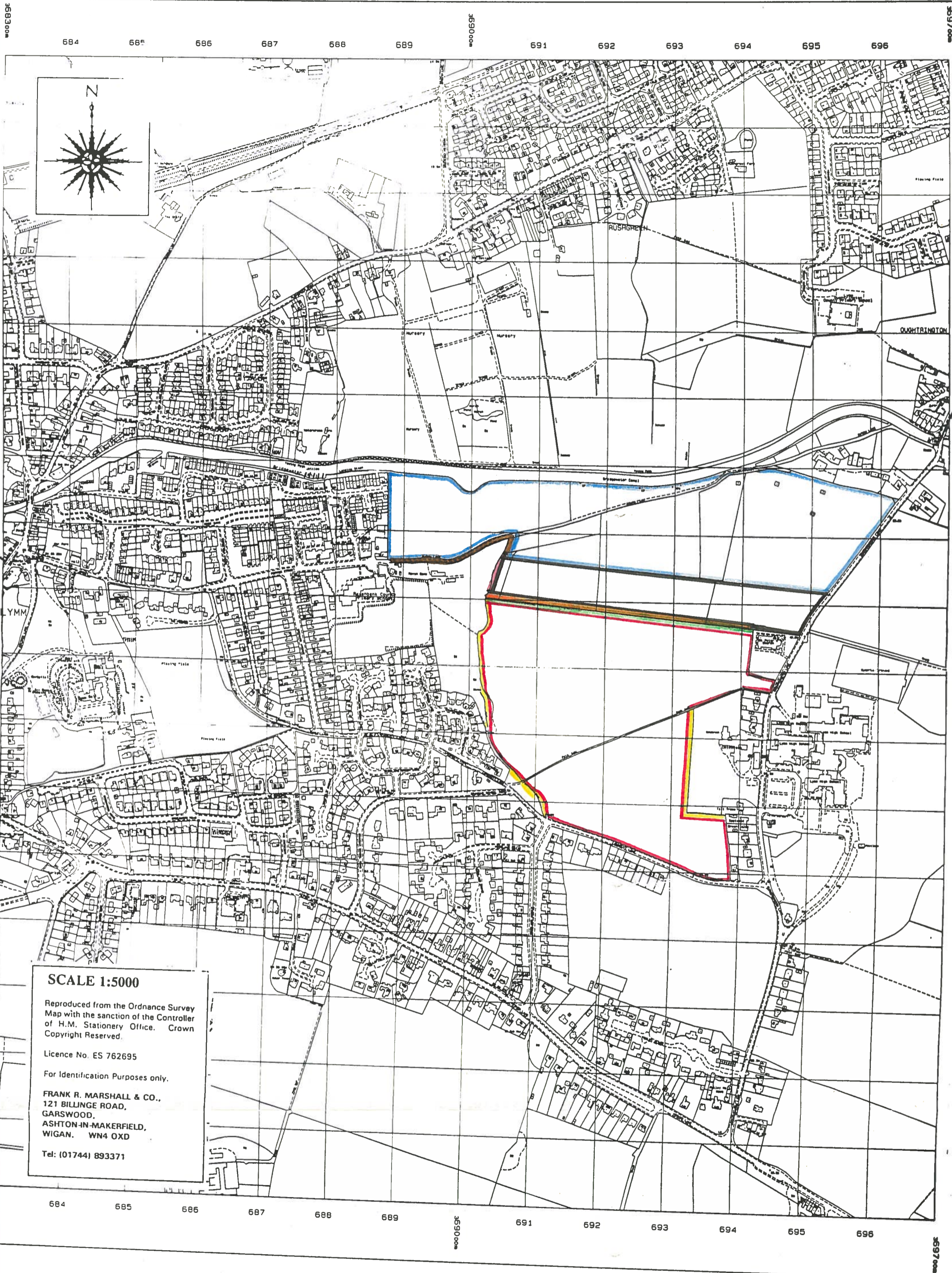
We trust that our comments will be taken on board during the site assessment process for the preferred options stage of the Local Plan. We would be happy to discuss the delivery of the site further with the Council if this is of assistance.

Yours faithfully

**BSc (Hons) MPLAN MRTPI**  
*Senior Planner*

## **Appendix A:** Land north of Longbutt Lane: Site Location Plan





**SCALE 1:5000**

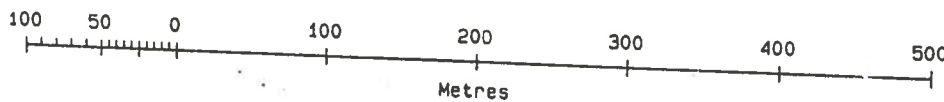
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## **Appendix B:** Land north of Longbutt Lane: Green Belt Assessment

**Revised LY19 Parcel Assessment**

<b>Ref</b>	<b>Purpose 1: to check the unrestricted sprawl of large built up areas</b>	<b>Purpose 2: to prevent neighbouring towns merging into one another.</b>	<b>Purpose 3: to assist in safeguarding the countryside from encroachment</b>	<b>Purpose 4: to preserve the setting and special character of historic towns</b>	<b>Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land</b>	<b>Justification for Assessment</b>	<b>Overall Assessment</b>
LY19 (revised)	No contribution: The parcel is not adjacent to the Warrington urban area and therefore does not contribute to this purpose.	No contribution: The parcel does not contribute to preventing towns from merging.	Weak contribution: The parcel is connected to the settlement on its southern and western boundaries. The parcel is connected to built form on its eastern boundaries (in addition to the southern and western boundaries). The parcel is therefore relatively contained. Development in this parcel would help ‘round off’ the settlement. It is considered that the parcel has a limited/ weak degree of openness – whereby the removal of the parcel from the green belt would not impact upon the overall openness of the green belt.	No contribution: Lymm is a historic town however the parcel is not within 250 metre of its Conservation Area. The parcel does not cross an important viewpoint of the Parish Council.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	The parcel makes a weak contribution to one purpose, a moderate contribution to one and no contribution to three. Development within this parcel would effectively be infill development which would be well contained by the existing landscape.	Weak contribution

## **Appendix C:** Land north of Longbutt Lane: SA Objectives Appraisal

### Land north of Longbutt Lane, Lymm:SA Site Appraisal Framework

The appraisal utilising the following desk top data sources: Magic map; EA flood maps and ground water protection maps; Historic England list, Warrington Borough Council SA Scoping Reports (figure 3.6, 3.7, 3.9, 3.11).

A neutral effect option has been introduced into the assessment in order to realise the role that mitigation can play in the assessment process.

SA Objectives	Criteria	Likely Effect (Significant Positive / Positive / Neutral/ Negative / Significant Negative)	Comments
<b>Economy and Regeneration</b>			
Strengthen the local economy and ensure sustainable economic growth	EC1: Would site development lead to the loss of employment land?	Positive	The site is not allocated for employment use at present.
	EC2: Distance to Principal Road Network by vehicle	Significant Positive	The site is less than 1 mile from the principal road network.
Reduce poverty, deprivation and social exclusion and secure economic inclusion	EC3: How close is the site to key employment sites?	Positive	Significant employment opportunities within 1.2km – 3km from the site.
<b>Health and Wellbeing</b>			
Enable groups to contribute to decision making and encourage a sense of community identity and welfare.	HW2: Is the area supported by community facilities? ( <i>Village halls, places of worship, community centre</i> )	Positive	Community facilities can be found adjacent to the site (place of worship, schools). Facilities within Lymm town centre are also within 1200m.
Provide, protect or enhance leisure opportunities, recreation facilities, green infrastructure and access to the countryside.	HW3: Access to local natural green space (ANGST). To what extent do the sites meet the following ANGST standards? 1. Natural greenspace at least 2 hectares in size, no more than 300 metres from home. 2. At least one accessible 20 hectare greenspace site within two kilometre of home.	Positive	Standard met. Natural greenspace at Spud Wood is within 300 metres. Lymm Damm is slightly further (400 metre approx).
	HW4: Access to formal play	Significant positive	Site will be capable of supporting the provision of onsite facilities.

SA Objectives	Criteria	Likely Effect (Significant Positive / Positive / Neutral/ Negative / Significant Negative)	Comments
<b>Accessibility</b>			
Reduce the need to travel, especially by car, improve choice and the use of more sustainable modes.  Protect and enhance accessibility for all the essential services and facilities.	ACC1: How accessible is the site to the nearest primary school on foot?	Significant positive	Site is within 400metres of Ravenbank Community Primary School. Opportunities exist to increase connectivity to this school.
	ACC2: How accessible is the site to the nearest secondary school?	Significant positive	Lymm High School is adjacent to the site to the east.
	ACC3: How well served is the site by a bus service?	Significant positive	Regular bus services frequent the A56 which is less than 400 metres from the site.
	ACC4: How accessible is the site to the nearest train station?	Significant negative	Nearest train stations are over 5 km from the site however the excellent accessibility of the site to local education facilities, bus services and services and facilities within Lymm town centre compensates for this likely effect.
	ACC5: What is the overall distance to a GP service or health centre?	Significant positive	The Brookfield Surgery is approximately 1100 metres from the site. Connectivity to the town centre could also be increased as part of the proposals this would be informed by an accessibility audit.
Ensure access to good quality, sustainable affordable housing.	HO1: To what extent will development help to meet housing needs? <i>Deliverability and scale</i>	Significant positive	Site is available for development within the next 5 years.
<b>Natural Resources</b>			
Ensure the sustainable and prudent use and management of natural resources including the promotion of natural resources including the promotion of sustainable drainage and water conservation.	NR1: What are the potential impacts on air quality?	Positive	The development is more than 1km from the AQMA associated with the M6.
	NR2: Could development of the site lead to the remediation of land potentially affected by contamination?	Significant positive	Whilst residential use would comprise a sensitive end use. The site is not thought to be contaminated given the limited historic use of the site, any contaminants present on site could be successfully mitigated through a remediation scheme.
	NR3: Would allocation of the site result in the loss of High Quality Agricultural Land?	Positive	Site contains less than 10 hectares of agricultural land 1-3.

SA Objectives	Criteria	Likely Effect (Significant Positive / Positive / Neutral/ Negative / Significant Negative)	Comments
Protect, manage and improve local environmental quality including land, air and controlled waters and reduce the risk of flooding.	NR4: Does the site fall within a Groundwater Source Protection Zone, as identified by the environment agency?	Neutral	The site falls within the zone 3 catchment area. Whilst the appraisal indicators state this to be a negative effect this is in fact neutral. Protection measures can be incorporated into the scheme design to control surface water runoff into the ground. PBA have experience of this type of mitigation in other schemes.
	NR5: Is the site (or part of) within an identified flood zone?	Positive	Site is within flood zone 1.
	RU3: Is there potential for safeguarded or identified mineral reserves to be sterilised?	Positive	No effects anticipated - the site is not known to be within an identified area.
<b>Built and natural heritage</b>			
Protect and enhance places and buildings of historic cultural and archaeological value.	BNH1: Proximity to designated heritage assets: <i>Conservation Areas</i> <i>Nationally listed buildings</i> <i>Scheduled Ancient Monuments</i> <i>Registered Park or Garden</i>	Neutral	There are three grade II listed buildings associated with the church and school, east of the site. A qualitative assessment such as a heritage statement will be submitted with any planning application submitted for the site. Identification and consideration of heritage issues from the outset of the masterplanning process in tandem with early and effective consultation with statutory and non-statutory bodies will ensure that no material harm to designated heritage assets will arise from development of the site.
	BNH2: Effects upon the significance and setting of heritage assets / the historic environment	Neutral	Through a sensitive design and materplanning process which considers the impact on heritage assets from the outset it is considered that the historic environment is unlikely to change from its baseline position.
Protect and improve the quality and character of places, landscapes, townscapes, and wider countryside whilst maintaining and strengthening local distinctiveness and sense of place.	BNH4: Capacity of the landscape to accommodate development, while respecting its character	Positive	Medium capacity. To be confirmed through landscape character assessment.

SA Objectives	Criteria	Likely Effect (Significant Positive / Positive / Neutral/ Negative / Significant Negative)	Comments
<b>Biodiversity and Geodiversity</b>			
Protect and enhance biodiversity and geodiversity	BG1: Could allocation of the site have a potential impact on a European Site SSSI, SPA or SAC	Positive	Outside catchment areas.
	BG1: Could allocation of the site have a potential impact on a SSSI	Positive	Over 400 metres from a SSSI.
	BG2: Could allocation of the site have a potential adverse impact on designated Local Wildlife Sites, Local Nature Reserve, RIGs, Potential Wildlife Sites or any other site of wildlife or geodiversity value such as Ancient Woodland (including where BAP species have been recorded.	Positive	Sufficient distance from designated sites. Phase 1 Extended Habitat Survey will inform masterplanning process and process of mitigation / offsetting (where relevant).
	BG3: What is the potential impact on TPOs.	Positive	Minimal amount of trees within site, higher quality trees will be retained where possible. Significant new tree planting would be included within the scheme design.
<b>Climate change and resource use</b>			
Minimise waste and maximise reuse, recovery and recycling	RU1: Would allocation of the site result in the use of previously developed land?	Neutral	Site is predominantly greenfield. The objectively assessed need for Warrington states that the release of greenfield land will be necessary in order for Warrington to deliver the levels of housing required.
	RU2: Is there good access to a Household Waste Recycling Centre (HWRC)?	Positive	Woolston Recycling Centre and Stockton Heath Recycling Centre are both less than 10km from the site.