



Dear Sir or Madam,

- 1. Objection to (1) proposed release of Parcel LY21 from Green Belt and (2) Call for Sites Response R18-111, lands to the north of Higher Lane, Lymm**
- 2. Objection to proposals contained in the overall Warrington Borough Council Local Plan**

We wish to **strongly object** to the proposed release of land from the Green Belt for the purpose of mixed development at the above site to the east of Lymm Village and to the proposed development plans for Warrington.

#### **1. Lymm**

##### Release of Parcel LY21 from Green Belt

We are very concerned about the proposed release of this area of Green Belt which lies on the eastern edge of Lymm to the north of Higher Lane. It is the last remaining area of Green Belt between Lymm and Broomeedge and by extension between the Warrington Borough Council footprint and that of Cheshire East.

I refer to the National Planning Policy Framework, paragraphs 79-92 which states that it 'takes exceptional circumstances to be demonstrated' for land to be released from the protection afforded by the Green Belt (1)

Paragraph 80 states the following:

'Green Belt serves 5 purposes-

1. To check the unrestricted sprawl of large built-up areas;
2. To prevent neighbouring towns merging into one another;
3. To assist in safeguarding the countryside from encroachment;
4. To preserve the setting and specialist character of historic towns;
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land'.

The following aspects of the Framework are relevant here:

- It is necessary to preserve this patch of Green Belt to check unrestricted sprawl and the merging of Lymm into Broomeedge;
- This area of Green Belt preserves the openness of the countryside and safeguards the countryside on the outskirts of Lymm from encroachment.

This area of Green Belt also preserves the setting and special character of Lymm as one approaches the village from the east

##### Weakening of existing Green Belt status from 'Strong' to 'Moderate'

It is unclear to us why the status of this parcel of Green Belt was downgraded from 'Strong' to 'Moderate' in June 2017 (2). We note that the original report dated October 2016 recommended

that the designation should stay as 'Strong' (3). Nothing has changed locally in the interim with regard to local use of buildings for farming and residential purposes, nor has there been any other development. We as local residents were unaware of the downgrade until now and were not consulted.

This area of Green Belt strongly preserves the openness of the countryside - there are clear views in a northeast direction to the centre of Manchester and the Pennines beyond, to Kinder Scout and the Peak District to the east and the Bolton/Blackburn conurbation, Winter Hill and nearby moors to the northwest. This is unsurpassed and unique and this openness must be preserved.

It will be destroyed irrevocably and permanently if developed as proposed.

**We therefore call on Warrington Borough Council to reinstate the designated status of this area of Green Belt to 'Strong' as per the original assessment (3)**

### Green Belt boundaries

The National Planning Policy Framework guidance on boundaries to the Green Belt states that boundaries should be defined 'clearly using physical features that are readily recognisable and that are likely to be permanent' (4). No such boundary exists on this site in the event of this area of Green Belt being released.

The existing Hellsdale Wood and Newheys plantation account for just half of the proposed boundary. Even though these areas are currently protected, there is no guarantee that they will not be cut down in the future. There is no other permanent structure for the remainder of the boundary. The proposed planting of trees in this space is inadequate and not permanent. There is nothing to stop subsequent removal of these trees and the extension of development in the future.

### Essar Cross Country pipeline

The main pipeline linking Stanlow oil refinery at Ellesmere Port to the works at Partington bisects this site. Ethylene and Propylene are transported at a high pressure of 90 bar and this pipeline is buried only three feet underground. Both of these substances are highly flammable. These substances are in liquid form when transported at this high pressure but would become gaseous and vaporise explosively in the event of a leak.

This is of great concern to us. It seems counterintuitive and reckless to build houses adjacent to such a pipeline. The Health and Safety Executive (HSE) regards the pipeline as a Major Accident Hazard.

We are concerned about the lack of detail contained in the report commissioned by the landowners (5). Their Utilities Briefing Note on page 182 is hidden away at the end of their 189-page report. The Note is shot and vague. It is lacking in evidence in terms of exactly what degree of development is allowed adjacent to such a pipeline. It is also incomplete as further information is awaited.

The HSE provides guidance for developers and local authorities (Planning Advice for Developers near Hazardous Installations) (6). The HSE advises that developers and Local Authorities use the Planning Advice Web app for guidance as to whether their development is appropriate. We are unable to check this as we cannot access the app as members of the public.

**We respectfully ask that the relevant experts at Warrington Borough Council do so to triangulate the assertions contained in the landowners' report and also to seek advice from the HSE as to whether the development would be appropriate.**

Green Belt parcel LY21 should remain as Green Belt. It should be redesignated as ‘**Strong**’. It provides a **strong contribution to fulfilling the fundamental aims of the Green Belt** for the reasons outlined above. The presence of a Major Accident Hazard Pipeline is an additional reason not to change the use of this land.

Lymm is an ‘Inset Village’ for very good reasons. Once its unique character is altered, it is altered irreversibly and permanently for future generations.

## 2. Warrington Local Plan

We have both worked and lived in Warrington for many years and are very familiar with the town. We are concerned at the scale and magnitude of the Local Plan for Warrington as a whole. The number of houses that are being proposed seem excessive and driven by the impetus for Warrington to become a City. The population projection by the council is 237,000 for 2037, an increase of 24,700 from the current 207,700 in 2017. Assuming 2 to 3 individuals per home on average, this equates to a housing need ranging from 8,233 to 12,350, not the proposed 24,000.

The amount of Green Belt that needs to be sacrificed to feed the building of these houses is excessive and based on flawed assumptions. The countryside around Warrington is beautiful. The proposed destruction of large tracts of Green Belt will be irreversible and should be resisted.

There are brownfield sites in Warrington that could be used to absorb some of this demand for new houses.

Nobody that we have spoken to wants Warrington to become a City. The driver for this seems to come from developers and landowners and not local residents.

### Conclusion - Warrington

We believe that the calculations for the number of new homes is flawed and based on the wish for Warrington to become a City, which is not what residents want. The destruction of large areas of Green Belt is unnecessary and should not occur.

Thank you for giving us the opportunity to respond to this consultation.

Yours Sincerely,

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\*Kindly note signed copy is in the post

### References

- (1) National Planning Policy Framework, updated 28 July 2017, paragraphs 79-92
- (2) Warrington Borough Council Green Belt Assessment, Addendum following Regulation 18 consultation, 29 June 2017
- (3) Warrington Borough Council Green Belt Assessment Final Report, October 2016, page H9, parcel LY21
- (4) National Planning Policy Framework, updated 28 July 2017, paragraph 85
- (5) Warrington Borough Council Call for Sites - submission R18-111, Higher Lane, Lymm, Development Statement, page 182
- (6) Health and Safety Executive Land Use Planning Methodology - Planning Advice for Developers near Hazardous Installations (no date)