



29th September 2017

To whoever it may concern,

I am writing to submit my opposition to the release of green belt land for housing. Specifically, my opposition relates to **R18/076 or SHLAA290 – land to the east of Crouchley Lane. Part of land LY22.**

In addition, I would like my opposition and comments to be taken into consideration for **R18/065 – land to west of Crouchley Lane and adjoining Lymm Dam area.**

I also want to register my full support for the documents and reports submitted by the group of residents from Higher Lane, Manor Road, Tower Lane and Crouchley Lane. These documents include Ref: FC/KN0116/17 – Walsingham Planning and submissions from Gary Earnshaw Planning dated September 2017.

My personal opposition is based on the following points:

Contribution of R16/076 to the green belt

All of the assessments commissioned by the Council have shown LY22 parcel of land to make a strong contribution to the green belt. This parcel includes R18/076 and R18/065.

In October 2016 the site was assessed by Arup for the Council. The site was assessed as part of a larger parcel, LY22, and was considered to make a 'strong' contribution to the Green Belt. The definition of 'strong' being defined in the report as 'on the whole the parcel contributes to the purpose in a strong and undeniable way, whereby removal of the parcel from the Green Belt would detrimentally undermine this purpose'.

Furthermore, the Council's own Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) July 2017 assessed the smaller parcel of land which has been promoted for housing under SHLAA reference 2901, renamed parcel R18/076 in this more recent document. The overall assessment of this smaller parcel was also as a 'strong contribution' as per the larger parcel LY22. The same was found for parcel R18/065.

The only report that has not assessed R18/076 site as strong was the landowners own report by Berry's. They assessed as moderate which is not surprise considering motivation to get land released.

In and around Lymm, the number of sites which were considered to make a strong contribution to the Green Belt around Lymm was 16. There were 8 parcels considered to only make a moderate contribution and 4 considered to make a weak contribution.

The Council should not release 'strong' contributing sites when there are 'weak' and 'moderate' contributions that can be considered first. Any release of 'strong' sites would be very suspect when they are 12 other sites which could be considered first.

Historic setting and conservation zone

In addition to the importance of these sites with regard to the principles of the Green Belt, there is also the significance of the Grade II Listed Water Tower and its setting. The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. Any development on the adjacent site would potentially affect the setting of this listed building.

LY22 parcel of land also forms part of the 250m buffer zone that has been drawn from the Lymm Conservation Area. As you know, the Conservation Area reflects the important characteristics of the historic town of Lymm. It is true that Arup assessment was that R18/076 made weak contribution to protection of conversation area as it is separated by residential development on Manor Road. I contend that the residential buildings on Manor Road should not be used as excuse to build within the buffer zone and should instead signal a need to more forcefully protect.

Access issues

Crouchley Lane is narrow and is not suitable for a significant increase in traffic. There are sharp bends in the lane with frequent on-street parking associated with the rugby club and visitors to the dam.

The width of the lane is inadequate for proper access arrangements and in many stretches could not be widened due to the bends in road or existing housing. Even if the lane could be widened this would require the removal of mature trees and hedging along the lane. Both of which provide habitat for wildlife and contribute to the green feeling of this area of Lymm.

I would also have concerns for pedestrian and highway safety arising from an increase in traffic on the lane. The pavement only runs to just past rugby club and there is limited lighting. To create pavement and add lighting would further compromise the green belt setting of the area.

It is my belief that the development would be contrary to Policy QE6 in respect of highways and traffic issues.

Ecology

Whilst not an identified protected site it cannot be assumed that there would be no impact on biodiversity in general or protected species in particular. The development of the site would potentially have an impact on protected species that have been seen in the area such as bats and lapwings. I have seen both of these personally.

In addition, although developers will always offer to replace trees or hedges it will take many years to get the level of diversity from the originals.

Provision of services

The landowners submission suggest that sites will provide easy access to services such as schools and GP's in Lymm. Whilst this may be true the Council's own assessment found that there are insufficient school places and GP provision in Lymm. The landowner proposals for LY22 do not make any contribution to helping the Council address these issues. Landowners for the other parcels around Lymm are making offers to help with this. As the Council struggles to meet residents needs in face of central Government cuts I suggest you consider those sites that have considered their role in providing services rather than expecting to rely on those already in Lymm.

Finally I would like to specifically address some of the points in the Berry report from landowners of R18/076:

- ***Suitable vehicular and pedestrian access with less traffic impact than alternative sites;***

The Crouchley Lane exit onto the A56 may meet this description but the rest of the lane does not. The alternative entrance/exit from field directly onto A56 is better but will require significant highway investment to meet safety needs. I am not clear how they assess traffic impact versus other sites and suggest this is based purely on proximity to A56 v's evidenced based report.

- ***Good accessibility on foot to primary and secondary schools, services and facilities;***

This is true but no consideration given to current pressure on services and no offer made to contribute to resolving.

- ***Less environmental impact than alternative sites, with this site having less agricultural, ground-water and ecological value than alternative sites;***

The site is assessed as grade 3 agricultural land, this is still good to moderate in quality and therefore still useful. The main difference between grade 2 and 3 is the variety of crops that can be grown with high yield.

No report on biodiversity has been commissioned by Berry's and therefore no evidence to support the ecological statement.

- ***Opportunities to enhance the natural environment and restore landscape character through new hedge and tree planting;***

There are existing trees, hedges and woodland. The only need to restore landscape character would be as a result of building on the site.

- ***No harmful impact to the historic character of the village;***

Building on this site will remove one of Lymm's strongest green belt sites and further diminish the village like character. Especially as the site is adjacent to the Lymm Conversation Area and falls within the 250m buffer for the Area.

- ***Opportunities to create attractive public open spaces that allow greater appreciation of the listed water tower and provide attractive walking routes across the site.***

There is already a public footpath across the site which provides this appreciation. Building on the site will remove the open view to the water tower and reduce the attractiveness of the current footpath.

- ***Relatively high level of contribution to affordable housing provision***

This assumes that the developer will use the site for affordable housing. There is no guarantee this will happen.

- ***Highly deliverable as the site is attractive to the market;***

The site is of course attractive as it is situated right in green belt and will therefore command high return for the developers.

Thanks for your attention in reading my submission for consultation. Hopefully I have made clear the reasons for my opposition to the release R18/076 and R18/065 from the green belt.

My last point is that I am not opposing the 500 homes. I just request that you consider non green belt first and then the weak green belt contributing sites versus starting with parcels of land that provide strong contribution.

Regards

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