WARRINGTON LOCAL PLAN REVIEW PREFERRED DEVELOPMENT OPTION CONSULTATION

Land east of Crouchley Lane, Lymm Green Belt Parcel LY22 SHLAA reference 2901 Call for sites reference R18/076

Representation on behalf of residents

in respect of possible removal of land

from the Green Belt for residential development

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INTRODUCTION

The Council is currently consulting on its Local Plan Preferred Development Option which sets out the proposed approach to meeting Warrington's need for new homes and jobs up to 2037.

The Preferred Development Option includes the managed release of Green Belt land. The Council considers that the Indicative Green Belt capacity for Lymm is 500 homes. A large number of sites have been put forward relative to the level of growth required and the Council has decided to hold back detailed site assessment work to confirm the individual sites to be allocated until after the preferred development options stage

The Council has however undertaken an initial review of the call for sites in terms of their land use characteristics and Green Belt performance.

The Council commissioned Ove Arup and Partners (Arup) to carry out a Green Belt Assessment. The final report was published on 21 October 2016. A further report, Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) was published in July 2017.

This representation relates to land east of Crouchley Lane which has SHLAA reference 2901 and is within Green Belt General area GA8 and parcel LY22 as identified in the Arup report. It has call for sites reference R18/076.

The site was put forward by landowners and a supporting statement was submitted by Berrys dated 5 December 2016. The site which measures some 13.4 ha and makes up approx 19% of the total area of parcel LY22 is put forward as being able to accommodate 240 dwellings.

ISSUES/CONCERNS

Several Warrington Local Plan policies support residents concerns and these are referred to below as appropriate

Green Belt

The Arup report concludes that parcel LY22 within which the site lies makes an overall strong contribution to the Green Belt. The residents agree with this assessment.

Furthermore, the residents' strong view is that the smaller site, 2901, also makes a strong contribution to the Green Belt for the same reasons, in particular that the site makes a strong contribution towards safeguarding the countryside from encroachment. It also contributes to the openness of the area, landscape character and enjoyment of the rural surroundings. The site is identified in the Council's SHLAA as being a constrained site due to Green Belt policy.

There are parcels in Lymm that are assessed as making a weak contribution to the Green Belt and these should be considered first, followed by those that make a moderate contribution. Sites that make a strong contribution should not be considered. This is consistent with the position taken by the Council in the Settlement Profile for Lymm published in July.

In respect of safeguarding the countryside from encroachment the Berrys report suggests that the site makes only a moderate contribution for the reasons that there is existing residential development on 2 ½ sides of the site; a woodland copse on the eastern boundary would contain encroachment in the long term; and the level of containment weakens the contribution made to safeguarding the countryside from encroachment.

It is considered that this argument is flawed in that there is a far wider open boundary marking the south of the site. Arup's assessment is that hedge and tree lined field boundaries are not durable and could not prevent encroachment beyond the parcel if the parcel were developed. The small copse should not be seen as a durable barrier that would prevent encroachment. The release from Green Belt and development of site 2901 would not prevent further encroachment in the future.

The residents support the Council's assessment that parcel LY22 makes a strong contribution to the Green Belt. Site 2901 also makes a strong contribution to the Green Belt fulfilling the fundamental aim of the Green Belt under paragraph 79 of the NPPF in protecting the openness of the Green Belt, as has been confirmed in the Green Belt Assessment of Call for Sites Responses published in July under which Site 2901 is labelled R18/076. Residents strongly disagree with Berrys attempts to diminish the contribution that this site makes to the Green Belt.

Strategic Objective W2 seeks to maintain the permanence of the Green Belt and the character of the countryside in the borough and protect them from inappropriate development.

Paragraph 6.20 of the Core Strategy states that the integrity of the Green Belt, which was established within the borough for the first time in 2006, is to be preserved across the entirety of the plan period and beyond. National policy makes clear that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are therefore their openness and their permanence. Paragraph 6.23 states that Sufficient contingencies are in place within the Local Plan Core Strategy to ensure that the protection of the Green Belt is sustainable in the longer term. The approach does not compromise growth aspirations during or beyond the plan period.

Policy CS 3 Overall Spatial Strategy - Maintaining a 10 Year Forward Supply of Housing Land sets out that should monitoring indicate that an on-going, 5 years' deliverable and a subsequent 5 years' supply of developable housing land can no longer be sustained or where it can be demonstrated that housing need cannot be met within Warrington, the Council will review its housing land provision, and bring on-stream additional housing sites as required, with priority given to <u>encouraging the reuse of previously developed land and</u> <u>avoiding sites in the Green Belt where possible.</u>

This policy still applies and there should be no change to the approach set out in CS5 Overall Spatial Strategy - Green Belt, that is the Council will maintain the general extent of the Green Belt for as far as can be seen ahead and at least until 2032, in recognition of its purposes: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

That policy sets out that there is therefore no need to review Strategic Green Belt boundaries during the plan period.

Notwithstanding any changes in requirements for new housing this approach should still apply and every effort should be made to avoid removal of land from the Green Belt. If this is unavoidable, only those sites that make a weak contribution to the Green Belt should be released, not those making a strong contribution as is the case with this site.

Landscape character and rural environment

Core Strategy Policy QE7 - Ensuring a High Quality Place seeks to maintain the landscape character and, where appropriate, distinctiveness of the surrounding countryside.

Policy CC 2 - Protecting the Countryside sets out that development proposals in the countryside which accord with Green Belt policies set out in national planning policy will be supported provided that; the detailed siting and design of the development relates satisfactorily to its rural setting, in terms of its scale, layout and use of materials; they respect local landscape character, both in terms of immediate impact, or from distant views; unobtrusive provision can be made for any associated servicing and parking facilities or plant, equipment and storage; they relate to local enterprise and farm diversification; and it can be demonstrated that there would be no detrimental impact on agricultural interests.

Should the site be removed from the Green Belt there are concerns about the impact of development on the landscape character of the area and in particular its rural characteristics.

As well as the obvious impact on local and from distant views of a large number of houses with associated garages, outbuildings, walls and fences etc, a significant factor would be the creation of a new access to Crouchley Lane. Notwithstanding highways and safety concerns, such a new access, designed to be suitable to serve 240 homes, and no doubt including loss of hedges and trees, introduction of street lights, pavements etc would introduce a significant urban characteristic into a narrow rural lane adversely affecting its character and the approach to this side of Lymm. Extensive car parking areas and other hard surfaced areas associated with the development of 240 homes would detract from the visual amenity of the area.

The Council has in its Core Strategy set out a number of objectives and policies in relation to securing a high quality environment. These include GI1:-

Identity, conserve, diversify and where appropriate extend the existing multi-functional network of green infrastructure in the urban and rural areas of the borough to maximise its value in providing opportunities for: space and habitat for wild flora and fauna and access to nature for people improving health and well-being through providing opportunities for relaxation to lower stress levels and providing access to both informal and formal sport and recreation for exercise, climate change adaptation through for example protecting the integrity of natural systems and processes, flood alleviation, cooling urban heat islands and the production of energy crops supporting economic development by providing attractive environments to contribute to inward investment opportunities for environmental education, local food production through allotments, private gardens and agriculture

The release of the site from the Green Belt and its development for housing would reduce potential habitat, would reduce peoples' enjoyment of the public right of way that crosses the site and so reduce its contribution to health and well-being, it would remove agricultural land and so reduce opportunities for local food production.

Such development would be contrary to Policy QE3 on Green Infrastructure and Policy QE6 Environment and Amenity Protection.

A further Objective (Objective T10) seeks to ensure that opportunities are taken to extend and enhance the existing public rights of way network. Development of the site would detract from enjoyment of and discourage use by locals and visitors who currently use the route for recreation and exercise. Regular users of the route include rambling groups, individual runners and walkers with pets and Lymm running Club.

Berrys report makes no significant reference to the enjoyment gained by the use of the right of way across the site and the impact of any large scale residential development on this enjoyment.

A separate consultants report will be submitted in respect of the impact of such a development on landscape character.

Agricultural land

The Agricultural Land Classification system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most

versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF). This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non food uses such as biomass, fibres and pharmaceuticals. Current estimates are that Grades 1 and 2 together form about 21% of all farmland in England; Subgrade 3a also covers about 21%.

The Agricultural Land Classification maps (including for the North-West) show Grades 1-5 but Grade 3 is not sub-divided. The site at Crouchley Lane is identified as Grade 3 land on the map for the North-West.

The ALC gives a high grading to land which allows more flexibility in the range of crops that can be grown (its 'versatility') and which requires lower inputs, but also takes into account ability to produce consistently high yields of a narrower range of crops.

This site has regularly produced a range of crops including:- potatoes (currently being harvested); wheat; peas; barley; rapeseed oil; soya bean and sugar beet. As such it could be considered to be Grade 3a land ie among the best and most versatile land. National and local policy would support the protection of such land from development. A fuller, more detailed assessment of this would be required and it is wrong for Berrys, without such an assessment, to conclude this isn't land that should be protected.

Access issues

The narrow lane is not suitable for a significant increase in traffic, there are sharp bends in the road and frequent on-street parking associated with the rugby club. The width of the road is inadequate for proper access arrangements which would likely require the removal of mature trees and hedging along the lane. There are concerns for pedestrian and highway safety arising from an increase in traffic on the lane.

An increased number of pedestrians, especially school children using the secondary access to Higher Lane again gives rise to safety concerns. There is only the possibility for one access to the site and there are concerns that this is not sufficient for a development of this size. The adequacy of the secondary access for emergency vehicles is a cause of concern especially as this will be shared with pedestrians.

The development would be contrary to Policy QE6 in respect of highways and traffic issues.

A separate consultants report will be submitted in respect of highways issues associated with a potential development of the site.

Residential amenity

As well as concerns about the immediate impact on the amenities of adjacent residents of a new housing development – privacy, overlooking,

overshadowing etc, there is also the issue of increased pedestrian activity along the public right of way and Tower Lane causing increased noise and disturbance and security concerns for residents.

Such detrimental impacts would be contrary to Policy QE6 of the Core Strategy.

Trees and hedgerows

There is concern about the potential loss of trees and hedgerows especially along Crouchley Lane resulting in harmful impact on biodiversity and rural character. A residential development of the site would not be likely to adequately incorporate trees and hedgerows to offset the harmful visual impact of such a development.

Setting of listed building

The development whilst not directly affecting the listed water tower adjacent to the site, would impact on its setting and in particular its landmark quality as a feature on the edge of the village

Drainage

The development of this site would result in a significant increase in hard surfacing and increased surface water run-off. There are already small areas at surface water flood risk as identified in Berrys report and adding to this would be contrary to national and local policy.

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. The presence of nearby ponds to the east also suggests that there may be issues of concern in respect of amphibians.

CONCLUSION

As well as Green Belt issues the potential development of the site raises numerous other concerns such that it would be contrary to national and local plan policies. Such development would not be sustainable and accordingly the land should not be considered for release from the Green Belt either individually or as part of LY22.