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# **Warrington Borough Council**

## **Local Plan**

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

### **Regulation 18 Consultation**

### **Standard Response Form**

**July 2017**

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

Resident in Warrington

Resident from outside of Warrington

Business

Other, please specify



## Site Specific Representations

Representations to the Preferred Options consultation –  
September 2017 – Various sites in Warrington

for ADS Estates

17-316



Project : 17-316  
Site address : Various sites in  
Warrington  
Client : ADS Estates  
  
Date : 27 September 2017  
Author : [REDACTED] [REDACTED]

Approved by : [REDACTED]  
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## 1. Introduction

- 1.1 Emery Planning are instructed by ADS Estates to prepare and submit representations to the Regulation 18 Consultation currently being conducted by Warrington Borough Council in September 2017.
- 1.2 The representations are submitted in the form of this statement, which makes specific representations to the proposed strategy for managing waste in the borough, before going on to assess our client's specific interests in the borough following the additional assessments of Green Belt sites published as part of the consultation evidence base. The formal response forms are also submitted. Overarching strategic representations are forwarded under separate cover.

## 2. Waste Strategy

- 2.1 The Council addresses the matter of waste at paragraphs 4.95 to 4.102 of the plan under the section entitled: 'Towards a preferred development option'. However no draft policies or land use designations are set out in relation to waste under section 5, which sets out the Council's preferred development option. In essence the Council has not set out its preferred approach to managing waste in the borough. This is a clear missed opportunity. Planning for waste needs should be an integral part of the Local Plan.
- 2.2 Paragraph 4.99 of the preferred options indicates small requirements for additional treatment capacity for a number of sources of waste. Our client's experience is that most, if not all, waste transfer stations within the area are operating at capacity. It is not clear to what extent the authority intends to address this issue.
- 2.3 Paragraph 4.102 of the preferred options refers to the safeguarding of existing, planned and potential waste management infrastructure. Clarification is required as to which sites this would apply to, and the details of the proposed policy approach.
- 2.4 ADS Recycling operate a waste transfer station at Camsley Lane, Lymm, which primarily deals with the transfer and recycling of inert and hazardous waste. The site is operating at capacity and our client has been investigating options to relocate to a new site. The land at Camsley Lane could then be redeveloped for housing. It is important that the Council sets out a positive, pro-active approach to identifying new sites for waste management and dealing with planning applications.

### **3. Introduction - Site Specific Representations**

- 3.1 This section sets out our client's land interests in the borough, which we propose as omission sites that are available and deliverable in the short and medium term. These sites would make an immediate contribution to the recommended higher annual housing delivery figure of 1,332, as recommended in our main report of representations. They would also assist with providing a more flexible supply of housing land, which is a key recommendation made in our consultation response in this report.
- 3.2 These sites were submitted as part of the formal call for sites exercise in December 2016. We resubmit them here for reconsideration for allocation, and respond to each relevant site appraisal as set out in the council's Green Belt assessment which forms part of the evidence base.

### **4. Disused railway line, north of Station Road, Latchford**

- 4.1 The proposed development site forms part of the former Warrington and Altrincham Junction Railway that was in operation from 1 November 1853 to 7 July 1985.
- 4.2 The site forms a raised linear strip of land located to the north of Station Road and Woolacombe Close and can be divided into three distinct areas (see the site location plan at **EP1** and the concept layout plan at **EP2**). The embankment comprises semi-natural woodland, scrub, semi-improved grassland, continuous bracken, tall ruderals, ephemeral/short perennials, introduced shrubs and invasive plant species (Japanese knotweed). The old railway line and rail infrastructure are still evident.
- 4.3 Area 1 is the central area between Wash Lane and Knutsford Road and crosses Grammar School Road by way of a sandstone bridge. To the north of the central section of the site is Sir Thomas Boteler High School. The playing fields of which adjoin the embankment and are identified in the Unitary Development Plan (UDP) as an Urban Green Space. To the south Cantilever Gardens, a modern residential development of 2 and 3 storey apartments buildings adjoins the site. The remaining boundaries with Station Road comprise vacant land and scrub. Area one extends to approximately 2.55 hectares.

- 4.4 Area 2 is the western section of the site to the north of Woolacome Close (made up of predominately 2 storey housing) and is bounded to the north by further residential development in Blackly Close and Our Lady's Primary School. Area 2 extends to approximately 1.21 hectares.
- 4.5 Area 3, the eastern section, extends to approximately 1.1 hectares and forms an area of land east of Knutsford Road to the north of residential development in Mersey Path and south of mixed residential and commercial development on Dover Road and Belmont Close.
- 4.6 The total site area detailed on the attached site location plan extends to approximately 4.86 hectares.
- 4.7 Whilst part of the former line between Latchford and Broadheath now forms part of the Trans Pennine Trail this land is disused, has no formal public access and does not contain any public rights of way.

#### Proposed use

- 4.8 The site is being promoted for a mixed use development, incorporating residential development of up to 280 dwellings and mixed commercial uses. A concept layout plan is appended at **EP2**.
- 4.9 The proposals involve the development of the 3 separate parcels of land independently in a character and form best suited to its surrounds whilst delivering a cohesive area of high quality mixed residential and commercial development across the site as a whole. The proposal will also deliver local infrastructure improvements and at least maintain the limited ecological interest currently within the site.
- 4.10 Area 1 is proposed to accommodate the highest density of development in keeping with the surrounding development to the south at Canterlever Gardens and has capacity to accommodate in the region of 100 apartments, 1950sqm of commercial space as well as a small number of terrace and mews properties. Access to this area would be taken from Station Road and would relate well as an extension of the existing central area of Latchford.
- 4.11 Area 2 is considered to lend itself to more traditional 2 storey development in the form of approximately 50 semi-detached dwellings with access taken from Wash Lane.
- 4.12 Area 3 would gain access via an existing vacant site on Dover Road and would again be appropriate for a traditional form of development encompassing a mix of two storey semi-



detached and terrace properties; as well as the number of three storey apartments. This would reflect the character of the adjacent sites. The area is likely to be able to accommodate in the region of 50 apartments; 25 terraced properties and 20 semi-detached properties.

- 4.13 Each of the sites would also encompass public open space, landscaping and an appropriate level of car parking.
- 4.14 Initial ecological assessment of the site has identified it to be of value to the local area as a wildlife corridor as it provides a means of dispersal for many species between fragmented habitats. As such the development proposals would be designed to minimise the impact of the development by maintaining complete connectivity through the site and compensating for any loss to the width of the site by enhancing the retained areas for the benefit of wildlife.
- 4.15 Given the current raised nature of the site, in the form of an embankment ranging between 30 and 70 metres wide, in order to make the site developable there would be a degree of excavation and levelling required. The proposals include lowering the level of the embankment to varying degrees across the site to make it structurally sound and development at an appropriate level to be in keeping with its surroundings. The levelling of the site would involve both an element of 'cut and fill' on site from areas of embankment to areas of depression, as well as transportation of a percentage of the overburden off site. Any material transported off site would be reused as aggregate and is anticipated to provide a sustainable source of materials locally.
- 4.16 Initial pre-application discussions have taken place with the Local Planning Authority, and an EIA Scoping Opinion has been provided in advance of a future planning application. For reference a copy of our Scoping Report is appended at **EP3**. The intention is to submit an application for phase 1 of the development as soon as possible, with further phases to follow.

#### Planning considerations

- 4.17 The site is available now, and the proposed development is considered to be viable. The site is being actively promoted by ADS Estates, which is headed by a local entrepreneur and developer.

- 4.18 The site offers an opportunity to deliver up to 280 dwellings and other uses on land within the urban area. As such it could assist in minimising the amount of Green Belt land required in order to meet the objectively assessed development needs of the plan.
- 4.19 The site comprises previously developed land in a sustainable location. The majority of the land is not covered by any specific planning policy designation in the current UDP, other than being within the defined settlement limits. Therefore, in principle, the redevelopment of a previously developed site within the urban area should be acceptable.
- 4.20 There are potentially very significant regeneration benefits arising from the development of the site. The railway line and waterfront at Latchford is currently severely neglected and underused. It represents a major area of opportunity for enhancing the built environment and revitalising the local area through inward investment. The proposed redevelopment is capable of creating an attractive environment that can be enjoyed by residents and employees of Latchford and remove a physical barrier between the centre of Latchford and the Waterfront which we consider is one of the primary reasons the area has not developed in the way it could have.
- 4.21 The development could deliver significant transport and connectivity improvements. The current disconnect between Latchford and its neglected waterfront is largely due to the physical severance caused by the railway line and the bridges. The proposed development can bring about substantial physical regeneration, and help to reconnect Latchford with the waterfront. The removal of the bridges also offers the opportunity to improve the existing highways situation.
- 4.22 A number of site specific matters have been investigated, including trees and ecology. The site comprises a mix of semi-natural woodland, scrub, semi-improved grassland, continuous bracken, tall ruderals, ephemeral/short perennials, and introduced shrubs. It is acknowledged to be of value to the local area as a wildlife corridor. In order to minimise the impact of development on the railway corridor complete connectivity through the site would be maintained and compensation habitat for the benefit of wildlife would be created. The draft masterplan incorporates areas of open green space and wildlife habitat. Appropriate planting and management throughout the development would form part of the mitigation and enhancement package.

- 4.23 There are no designated assets (Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Registered Battlefields) within the site boundary. However the railway bridge at Knutsford Road is noted in the Unitary Development Plan (Annex 10) as being a structure of local importance of architectural or historic interest. This bridge is proposed to be demolished as part of the proposed development. However the bridge acts to constrain highway flows in the local area and its removal could offer the opportunity to improve highway convenience and safety.
- 4.24 A number of Listed Buildings are located within 1km of the site boundary. However, these are all either within an urban context or far enough away from the site so that there is unlikely to be any impact upon their settings or significance.
- 4.25 The plans within the document do not appear to designate the site for any use, although a small part is identified as greenspace. A designation for greenspace is not evidenced or justified within the plan or evidence base. Similarly, for any proposed highway improvements notwithstanding that we are aware of these unjustified and unevidenced proposals, they are not apparent in the online accessible proposals plans and need significant further consultation.

#### Summary and conclusions

- 4.26 The site offers significant opportunities to bring this former railway land, which has remained unused for some 30 years, back into productive use to create an attractive and sustainably designed residential and commercial development within walking/cycling distance of local services and facilities. The development would also provide a sustainable source of recycled base material for use in construction throughout the local area.
- 4.27 The mixed residential and commercial development of the site will enable regeneration of this area and greater connectivity between Latchford and the canal and removing a significant physical barrier within the community. It would also help contribute to the Council's deliverable housing land supply and importantly the affordable housing needs of the Borough. It would also comply with the sustainable-led aims of the Government as set out in the Framework.

## 5. Land to the south of Lymm Road, Thelwall

- 5.1 This is a greenfield site located at the eastern edge of Thelwall, located within the Green Belt. A site location plan is appended at **EP4**.
- 5.2 The site is bounded to the west by existing residential development along Bell Lane as well as a boundary of existing vegetation. The eastern boundary is another linear line of vegetation beyond which lies an agricultural field. The southern boundary is Stockport Road. Finally, the site is bounded to the north by the B5157.
- 5.3 The site is approximately 3.36ha in area and is within the ownership of our client. The site is a vacant greenfield site. We are not aware of any constraints to development and the site is available and suitable for residential development, in line with local and national planning policy. Only the existing Green Belt designation prevents the site coming forward now.
- 5.4 Paragraph 84 of the Framework states that when *"reviewing Green Belt boundaries, local authorities should take account of the need to promote sustainable patterns of development"*. It is our view that this site should be removed from the Green Belt due to its location, its minimal contribution towards protecting openness, and its sustainable attributes.
- 5.5 We reviewed the council's Green Belt assessment (October 2016) in December 2016 and noted that the site formed a small part of parcel WR32. This was identified in the assessment as having a 'strong contribution' to the Green Belt. However, the site has now been assessed in the council's updated site assessment document published as part of the evidence base, where the site is assessed as making a 'moderate contribution' to the Green Belt.
- 5.6 We welcome the council's acknowledgement that the site does not, as previously stated, make a strong contribution to the Green Belt. This lesser contribution needs to be considered in the context of the purposes Green Belt designation.

### Check the unrestricted sprawl of large built-up areas

- 5.7 Parcel R18/116 is identified in the Green Belt Assessment as making no contribution towards the prevention of urban sprawl, stating that:

*"The site is not adjacent to the Warrington urban area and therefore does not contribute to this purpose."*

5.8 We agree with this assessment.

Prevent neighbouring towns from merging into one another

5.9 The development of the site would not in itself lead to neighbouring towns merging into one another. This is acknowledged in the Green Belt Assessment of R18/116. The nearest settlement is some distance from the site and the bulk of the Green Belt would remain. The development of this site represents a logical rounding-off opportunity. The council agrees that it makes a weak contribution in this respect, stating that:

*"The site forms a less essential gap between the Warrington urban area and Lymm whereby development of the site would slightly reduce the actual gap between the towns but not the perceived gap. It would not result in the towns merging. The M6 ensures that separation is retained. Overall the site makes a weak contribution to preventing towns from merging."*

Assist in safeguarding the countryside from encroachment

5.10 The site is assessed as making a 'strong contribution' in this respect, stating that:

*"The site is not adjacent to the settlement and is fully connected to the countryside and wider Green Belt however there is existing development within the Green Belt to the west, south and further north and north east of the site. The boundaries between the site and the countryside are of mixed durability consisting of Lymm Road to the north and Stockport Road to the south, both of which are durable boundaries which could prevent encroachment beyond the site if the site was developed. The western boundary consists of the rear gardens of residential properties and a wooden and wire post fence which are not durable and would not be able to prevent encroachment. The eastern boundary consists of tall mature trees which due to their height represent a durable boundary. The site contains no built form and the topography is undulating sloping upwards from Lymm Road. The site consists of open countryside, it has no built form and is flat with vegetation around the boundaries. Views are fairly open although long line views are somewhat hindered by vegetation and thus it supports a strong-moderate degree of openness. Overall the site makes a strong contribution to safeguarding from encroachment due to its openness and the non-durable western boundary"*

5.11 There would be some encroachment but this must be considered in light of the required uplift in housing targets as set out in this report, and the fact that releasing more Green Belt is the only realistic option for meeting those needs. The site has clearly defined boundaries to the west, north and south. The development of the site would be well screened by existing residential development and would not appear as an intrusion into the open countryside. Countryside

beyond would fulfil the safeguarding criteria. We do not therefore agree that the site makes a strong contribution.

Preserve the setting and special character of historic towns

5.12 This purpose is not applicable in this instance.

Assist in urban regeneration, by encouraging the recycling of derelict and other urban land

5.13 The Green Belt assessment states that the site makes a 'Moderate contribution' to this purpose. The assessment states that the Mid Mersey Housing Market has 2.08% brownfield urban capacity for potential development and therefore the parcel makes a moderate contribution. However, as clearly demonstrated in the evidence base, the release of Green Belt land will be essential to meeting the housing requirements of the borough. In our view the development of land north of Stockport Road would not conflict with this purpose. It would assist in urban regeneration by providing much needed housing to meet the needs of the borough. Furthermore, there is little if any tangible evidence that restricting development in the Green Belt actually results in previously developed land coming forward any quicker.

5.14 The 'Justification for Assessment' column in the assessment of R18/116 states that:

*"The parcel makes a strong contribution to one purpose, a moderate contribution to two, a weak contribution to one, and no contribution to one. In line with the methodology, professional judgement has been applied to evaluate the overall contribution. The parcel has been judged to make a strong overall contribution. The parcel has a strong role in preventing further ribbon development along Bell Lane and Stockport Road and the boundaries between the parcel and the built up area are not permanently durable thus it has a strong role in checking unrestricted sprawl. 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. The parcel makes a moderate contribution to safeguarding from encroachment and assisting in urban regeneration."*

5.15 The site was therefore concluded to make a 'moderate contribution' to the Green Belt.

5.16 We still conclude that it makes a 'weak contribution' to the Green Belt and would be a logical extension of the urban area by rounding off the existing Green Belt boundary for the reasons set out above.

- 5.17 The site is not physically constrained by flood risk, ecological issues or topography and has good access to Stockport Road to the south and the surrounding highway network; particularly the M6 a short distance to the east. The site is highly sustainable within walking distance of the centre of Thelwall. It is well related to local infrastructure and amenities.
- 5.18 The site is available and suitable for residential development but is not deliverable at this time due to the Green Belt policy designation. Removal of this site from the Green Belt would not harm the purposes of the Green Belt, and would provide a deliverable site for residential development which would contribute towards the Borough's housing requirement.

## **6. Land at Walton Lea Road, Stockton Heath**

- 6.1 This is a greenfield site located at the western edge of Higher Walton which is in essence part of the Warrington Urban Area. However, it is located within the Green Belt. A site location plan is appended at **EP5**.
- 6.2 The site is bounded to the west by Walton Lea Road which also extends around the northern boundary. The eastern boundary is existing residential development accessed off Cranleigh Close and Hillford Crescent. The southern boundary is a canal. The site is effectively enclosed by existing permanent development on all sides. In addition, Warrington Sports Club is located on the opposite side of Walton Lea Road, adjacent to the site.
- 6.3 In total the site is 3.03 hectares (7.50 acres) and is within the ownership of our client. The site is a vacant greenfield site. We are not aware of any constraints to development and the site is available and suitable for residential development, in line with local and national planning policy.
- 6.4 However, the site is located in the Green Belt and is therefore currently not achievable. It is our view that the development of the site would not prejudice the objectives of including land in the Green Belt as defined in the Framework. The site was identified in the Green Belt Assessment (October 2016) as part of parcel WR63.
- 6.5 It is identified in the additional Green Belt site assessment document published as part of this consultation as R18/108. However, there is no assessment provided for R18/108 in the document. Similarly, there is no reference to the site name. We assume this is an error on the council's part. It is identified on the map in the Green Belt Assessment (Additional Site Assessments of Call for

Sites Responses and SHLAA Green Belt Sites - July 2017) in green, which means the council still considers it to make a 'strong contribution' to the Green Belt. It is recommended that the council assesses the site on its own merits as soon as possible, as it is a highly logical site for residential development; particularly in the context of its relationship to the South Western Urban Extension (whose release has not been considered to harm the Green Belt) and the existing urban area adjacent to its eastern boundary.

- 6.6 In the absence of a specific site assessment on the council's part, we therefore refer to our representations made to site WR63 in December 2016 and set out our analysis of the Green Belt assessment of the site below.

Check the unrestricted sprawl of large built-up areas

- 6.7 The Green Belt assessment identifies the site as making a 'moderate contribution' to this purpose. It is important to note that WR63 is also comprised of the land to the west of Walton Lea Road. Whilst the redevelopment of the entire parcel may have an impact in this respect, it is clear that the development of our client's site only most certainly would not. The site is adjacent to development to the east and north, and would represent a highly logical rounding off of the Green Belt boundary. The site is clearly defined by its strong boundaries. Furthermore, the remainder of the parcel to the west is highly unlikely to be developed or subject to sprawl as it is a well-established and well used recreational facility with extensive open playing fields.

Prevent neighbouring towns from merging into one another

- 6.8 The development of the site would not in itself lead to neighbouring towns merging into one another due to the particular characteristics of the site as set out above. This is confirmed in the Green Belt assessment's designation of 'weak contribution' to this purpose. The nearest settlement is some distance from the site and the bulk of the Green Belt would remain.

Assist in safeguarding the countryside from encroachment

- 6.9 The site is considered to make a 'strong contribution' to this purpose, stating that:

*"The boundaries between the parcel and the built up area are not durable and would not prevent encroachment into the parcel. The parcel is only connected to the countryside along two boundaries. The boundaries between the parcel and the countryside consist of Walton Lea Road and the Bridgewater Canal which represent durable boundaries which could prevent encroachment beyond the parcel if the parcel were developed. The existing*



*land use consists of open countryside. The parcel is flat with no built form and long line views thus it supports a strong degree of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment due to its openness and non-durable boundaries with the settlement."*

- 6.10 As stated in our analysis of purpose 1, the above conclusion relates to a large parcel and the land associated with our client represents only a small proportion of that which has been assessed above. When taking the proposed site in isolation and having regard to the above comments, the site's clearly defined strong boundaries combined with having built development to the north, east and south clearly indicates that it has 'no contribution' or at most a 'weak contribution' to the Green Belt purpose of encroachment and would be a logical extension of the urban area by rounding off the existing Green Belt boundary. There would be some encroachment but this must be considered in light of the housing need and the fact that releasing Green Belt is the only realistic option for meeting those needs and is a logical conclusion of the release of any Green Belt land adjacent to an existing settlement. The development of the site would be bounded by Walton Lea Road and would not appear as an intrusion into the open countryside.

Preserve the setting and special character of historic towns

- 6.11 This purpose is not applicable in this instance.

Assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 6.12 The Green Belt assessment states that the parcel known as WR32 makes no a 'Moderate contribution' to this purpose. The assessment states that the Mid Mersey Housing Market has 2.08% brownfield urban capacity for potential development and therefore the parcel makes a moderate contribution. However, the release of Green Belt land will be essential to meeting the housing requirements of the borough. In our view the development of land north of Stockport Road would not conflict with this purpose. It would assist in urban regeneration by providing much needed housing to meet the needs of the borough. Furthermore, there is little if any tangible evidence that restricting development in the Green Belt actually results in previously developed land coming forward any quicker.

- 6.13 The justification for the assessment of the site as making a 'strong contribution' states that:

*"The parcel makes a strong contribution to one purpose, a moderate contribution to two, a weak contribution to one, and no contribution to one. In line with the methodology, professional judgement has therefore been*

*applied to evaluate the overall contribution. The parcel has been judged to make a moderate overall contribution as although it supports a strong degree of openness, the boundaries between the parcel and the countryside are durable thus any development would be contained and would therefore not threaten the openness and permanence of the Green Belt. The parcel makes a moderate contribution to checking unrestricted sprawl and assisting in urban regeneration."*

- 6.14 As stated above, this designation is wholly inappropriate for our client's site, particularly when assessed in isolation to the wider parcel to the west. It is a site bounded on multiple sides by existing residential development and it is a highly logical rounding off of the settlement boundary.
- 6.15 The site is not physically constrained by flood risk, ecological issues or topography and has good access to Walton Lea Road to the west and the surrounding highway network. The site is highly sustainable within walking distance of the centre of Stockton Heath. It is well related to local infrastructure and amenities.
- 6.16 The site is available and suitable for residential development but is not deliverable at this time due to the Green Belt policy designation. Removal of this site from the Green Belt would not harm the purposes of the Green Belt and would provide deliverable residential development which would contribute towards the Borough's significant housing requirement.

## **7. Land to the east of Hough's Lane, Stockton Heath**

- 7.1 A site location plan is appended at **EP6**.
- 7.2 This site is largely greenfield but has a large residential dwelling within it. It is bounded to the west by Hough's Lane and has a clearly defined boundary comprised of trees and hedgerows along the northern, eastern and southern boundaries of the site. The parcel of land was individually assessed as part of the Warrington Green Belt Assessment and is identified as parcel WR62 in October 2016. It has been included as site R18/102 in the updated site specific Green Belt assessment published as part of this consultation. It is assessed as making a 'moderate contribution' to the Green Belt.
- 7.3 We are not aware of any constraints to development and the site is available and suitable for residential development, in line with local and national planning policy. Due to its Green Belt

location, it is currently not achievable, but this could be changed through an amendment to the Green Belt boundaries.

- 7.4 It is our view that the development of the site would not prejudice the objectives of including land in the Green Belt as defined in the Framework. We set out our analysis of the updated Green Belt assessment of the site below:

Purpose 1: to check the unrestricted sprawl of large built-up areas

- 7.5 The development of the proposed site for residential housing would not compromise this purpose. The council's Green Belt Assessment acknowledges this, stating that:

*"The site only has a very limited connection with the built-up area at its north eastern corner with the Bridgewater Canal. This represents a durable boundary which could prevent sprawl. Given the shape of the built-up area, development of the site would not round of the settlement pattern. Overall the site makes a weak contribution to checking unrestricted sprawl".*

- 7.6 We agree that the site makes a weak contribution to this purpose due to the aforementioned durable boundaries.

Purpose 2: to prevent neighbouring towns merging into one another

- 7.7 The development of the site would not in itself lead to neighbouring towns merging into one another, and this is acknowledged in the Green Belt Assessment, which states that:

*"The site forms a less essential gap between the Warrington urban area and Runcorn in the neighbouring authority of Halton whereby a reduction in the gap would slightly reduce the distance between the towns but would not result in them merging. Overall the site makes a weak contribution to preventing towns from merging."*

- 7.8 We agree with this assessment.

Purpose 3: to assist in safeguarding the countryside from encroachment

- 7.9 The site is considered to make a strong contribution in this respect. There would be some encroachment but this must be considered in light of the housing need and the fact that releasing Green Belt is the only realistic option for meeting those needs. Furthermore, the site is located very near to the proposed South Western Urban Extension, which the council has committed to delivering. It must therefore be viewed in the new context of a much more

urbanised area and the natural conclusion that releasing Green Belt land on the edge of a settlement will result in some encroachment to a degree.

- 7.10 The development of the site would be firmly enclosed by its physical boundaries, which as set out above are very clearly defined and extremely durable. However, the council considers it to make a strong contribution to this purpose, stating that:

*"The site is very well connected to the open countryside along all its boundaries. The boundaries between the site and the countryside consist of Hough's Lane to the west which is a durable boundary, the Bridgewater Canal to the north which is a durable boundary, and dense wooded areas to the east and south which are durable. These boundaries could prevent encroachment beyond the site if the site were developed. The existing land use consists of Beechtree Farm and open countryside. The site is flat with limited vegetation within it and long line views thus it supports a strong degree of openness. Overall the site makes a strong contribution to safeguarding from encroachment."*

- 7.11 This assessment is contradictory in that it acknowledges the site's clearly defined boundaries which would prevent further encroachment, and yet the site's contribution in this respect is assessed as 'strong'. It also states that the wooded areas along the boundary are "very dense", yet states that the parcel has "limited vegetation" which supports a strong degree of openness. It is considered that there would be some encroachment but this must be considered in light of the housing need, the new urbanised context of the immediate locality, and the fact that releasing Green Belt is the only realistic option for meeting those needs. The development of the site would be bounded by the aforementioned strong boundaries, and for this reason would not appear as an intrusion into the open countryside as any development would be very well screened.

Purpose 4: to preserve the setting and special character of historic towns

- 7.12 This is not applicable in this instance.

Assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 7.13 The Green Belt assessment states that the site makes a 'Moderate contribution' to this purpose. The assessment states that the Mid Mersey Housing Market has 2.08% brownfield urban capacity for potential development and therefore the parcel makes a moderate contribution. However, the release of Green Belt land will be essential to meeting the housing requirements of the borough. In our view the development of land north of Stockport Road would not conflict with

this purpose. It would assist in urban regeneration by providing much needed housing to meet the needs of the borough. Furthermore, there is little if any tangible evidence that restricting development in the Green Belt actually results in previously developed land coming forward any quicker.

7.14 The justification for the assessment of the site states that:

*"The site makes a strong contribution to one purpose, a moderate contribution to one, a weak contribution to two, and no contribution to one. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution as although it supports a strong degree of openness, the boundaries between the site and the countryside are durable thus any development would be contained and would therefore not threaten the overall openness and permanence of the Green Belt. The site makes a weak contribution to checking unrestricted sprawl and preventing towns from merging."*

7.15 We broadly agree with the council's comments and we welcome the acknowledgement that the site's strong boundaries would result in a very contained development. However, we disagree that the site makes a 'moderate' contribution, as the council has not demonstrated sufficient justification for assessing the site's contribution to purpose 3 as 'strong.', particularly in the context of the proposed South Western Urban Extension extending a considerable distance to the west.

7.16 The site is not physically constrained by ecological issues or topography and has good access to Hough's Lane to the west and the surrounding highway network. The site is highly sustainable within walking distance of Lower Walton. It is well related to local infrastructure and amenities.

7.17 The site is available and suitable for residential development but is not deliverable at this time due to the Green Belt policy designation. Removal of this site from the Green Belt and its allocation in the plan for residential development would not harm the purposes of the Green Belt and would provide deliverable residential development which would contribute towards the Borough's significant housing requirement; particularly in the first 5 years where housing delivery has been constrained.

## 8. Land to the south of Westbourne Road and west of Red Lane

- 8.1 A site location plan is appended at EP7.
- 8.2 The site is a greenfield site located to the south of residential development along Westbourne Road. It is bounded to the east by Red Lane and to the west and south by open fields which have also been assessed as part of the Green Belt assessment. We are not aware of any constraints to development and the site is available and suitable for residential development, in line with local and national planning policy.
- 8.3 However, due to its Green Belt location, it is currently not achievable. It is our view that the development of the site would not prejudice the objectives of including land in the Green Belt as defined in the Framework.
- 8.4 We made representations to the Call for Sites exercise in December 2016. However, the site has been individually assessed as part of this consultation and is identified as R18/105. It is assessed in the Overall Assessment as making a 'weak contribution' to the Green Belt. However, in the justification, the site is assessed as making a moderate contribution overall. We would seek clarity on this issue and confirmation that the site does indeed make a 'weak contribution' to the Green Belt in this instance.
- 8.5 We set out our analysis of the Green Belt assessment of the site below:

Purpose 1: to check the unrestricted sprawl of large built-up areas

- 8.6 The development of the proposed site for residential housing would not compromise this purpose. The site represents a logical rounding off of the settlement boundary and is adjacent to residential development on both its northern and eastern boundaries. It would not therefore represent unrestricted sprawl. The council's Green Belt Assessment acknowledges this, stating that:

*"Bridgewater Canal forms a durable northern boundary between the site and the built-up area, however the eastern boundary is formed by the rear of residential development along Red Lane which is not permanently durable enough to prevent sprawl into the site in the long term. The site is fairly well connected to the built-up area along these two boundaries. Given the shape of the built-up area, development of the site, alongside other areas of land*

*surrounding the site could be seen as rounding off the settlement pattern. Overall the site makes a weak contribution to checking unrestricted sprawl".*

8.7 We agree with the council's assessment in this instance.

Purpose 2: to prevent neighbouring towns merging into one another

8.8 The development of the site would not lead to neighbouring towns merging into one another, and this is acknowledged in the Green Belt Assessment, which states that:

*"No contribution: The parcel does not play a role in preventing towns from merging."*

8.9 We agree with this assessment.

Purpose 3: to assist in safeguarding the countryside from encroachment

8.10 There would be some encroachment but this must be considered in light of the housing need and the fact that releasing Green Belt is the only realistic option for meeting those needs. The site has clearly defined, durable boundaries consisting of trees, a cemetery boundary and a golf course boundary. The council considers it to make a 'moderate' contribution to this purpose, stating that:

*"The boundary between the site and the built-up area is a mix of durable and non-durable boundaries, with the Bridgewater Canal to the north which is durable and rear of residential development to the east which would not be able to fully prevent encroachment into the site. The boundaries between the site and the countryside consist of field boundaries to the west and the south is tree line marking the golf course boundary which are not durable and may not be able to prevent encroachment beyond the site. There is a boundary to the south east which consists of a heavy tree lined cemetery boundary which is durable. The existing land use consist of open countryside in agricultural use. There is no built form and limited vegetation. The topography slopes downwards from south to north thus long line views from the settlement are hindered. The site supports a moderate degree of openness. Overall the site makes a moderate contribution to safeguarding from encroachment due to its openness and mostly durable boundaries."*

8.11 We consider the site to make a 'weak contribution' to this purpose at best, and disagree with the council's view that some of the site boundaries are not durable. The site has existing residential development on two boundaries and its development for residential would represent a logical rounding off of the settlement boundary. The golf course boundary is clearly durable

both in terms of landscape and the use itself which is protected by other policies. Furthermore, its development would not have a significant impact on openness for this reason.

Purpose 4: to preserve the setting and special character of historic towns

8.12 This is not applicable in this instance.

Assist in urban regeneration, by encouraging the recycling of derelict and other urban land

8.13 The Green Belt assessment states that the parcel known as WR62 makes no a 'Moderate contribution' to this purpose. The assessment states that the Mid Mersey Housing Market has 2.08% brownfield urban capacity for potential development and therefore the parcel makes a moderate contribution. However, the release of Green Belt land will be essential to meeting the housing requirements of the borough. In our view the development of land north of Stockport Road would not conflict with this purpose. It would assist in urban regeneration by providing much needed housing to meet the needs of the borough. Furthermore, there is little if any tangible evidence that restricting development in the Green Belt actually results in previously developed land coming forward any quicker.

8.14 The justification for the assessment states that:

*"The site makes a moderate contribution to two purposes, a weak contribution to one purpose and no contribution to two. In line with the methodology, the site has been judged to make a moderate overall contribution. The site supports a moderate degree of openness and the boundaries between the site and the settlement and the site and the countryside are of mixed durability thus the site has a moderate role in safeguarding from encroachment. The site makes a weak contribution to checking unrestricted sprawl given that development of the site alongside adjacent areas of land could be seen as rounding off the settlement pattern. The site makes a moderate contribution to assisting in urban regeneration."*

8.15 We disagree that the site makes a 'moderate contribution' overall. However, we welcome the acknowledgement that its development would represent a rounding off of the settlement boundary. We consider the site to make a 'weak contribution' overall. The site makes a 'weak' or 'no' contribution in terms of sprawl, encroachment and prevention of merging for reasons set out above.



- 8.16 The site is not physically constrained by ecological issues or topography and has good access to Red Lane to the east and the surrounding highway network. The site is highly sustainable within walking distance of Lower Walton. It is well related to local infrastructure and amenities.
- 8.17 The site is available and suitable for residential development but is not deliverable at this time due to the Green Belt policy designation. Removal of this site from the Green Belt would not harm the purposes of the Green Belt and would provide deliverable residential development which would contribute towards the Borough's significant housing requirement; particularly in the first 5 years of the plan which, as set out in the report, is significantly constrained.

## **9. ADS Recycling, Camsley Lane, Thelwall**

- 9.1 The site is a commercial waste recycling yard and transfer station operated by ADS Recycling. A site location plan is appended at **EP8**.
- 9.2 The site is bounded to the north by Camsley Lane, to the south by and west by open fields, and to the east by land adjoining further commercial development.
- 9.3 Over the years the existing use has been subject to various complaints from neighbouring residents. Although we maintain that the use of the site is fully lawful and that there is no evidence of harm to residential amenity, the redevelopment of the site would presumably be welcomed by the Council and local residents. However if the site is to be redeveloped for housing, it will be necessary to secure a suitable site for the relocation of the business. Our client is willing to work with the Council in order to identify and bring forward the new site.
- 9.4 The site (Camsley Lane) is wholly within the Green Belt and is therefore subject to Green Belt policy. It is approximately 1.2ha in area, and is capable of accommodating around 36 dwellings (based on 30 units per ha).
- 9.5 The site lies partly within Flood Zone 2. It is proposed that development would be limited to the parts of the site not at risk of flooding. Any potential contamination issues would be assessed and if necessary remediated. The site is reasonably accessible, in that it is located approximately 1.5km from Lymm and its associated infrastructure and amenities. It is also well connected to the M56 and M6 motorways. The site is wholly within our client's ownership, and is therefore available, suitable and achievable; and would contribute towards meeting the borough's housing requirement.

- 9.6 It is a brownfield site in a loose ribbon of residential development between Lymm and Thelwall. It is in an area that does not make a strong contribution to the purposes of the Green Belt as set out in the authority's assessment methodology, as set out in October 2016.
- 9.7 The site was not assessed as part of the authority's original Green Belt Assessment. However, it has been assessed and identified as R18/100 in the updated assessment published as part of this consultation. It is assessed as making a 'weak contribution' to the Green Belt.
- 9.8 We address the proposed site's suitability for residential development in the context of each 'purpose' as set out in Section B1 of the Warrington Borough Council Green Belt Assessment below.

Purpose 1: to check the unrestricted sprawl of large built-up areas

- 9.9 The development of the proposed site for residential housing would not compromise this purpose. The site comprises previously developed land and its redevelopment for housing would not represent unrestricted sprawl. The council accepts this, stating that:

*"The site is not adjacent to the Warrington urban area and therefore does not contribute to this purpose"*

Purpose 2: to prevent neighbouring towns merging into one another

- 9.10 The development of the site would not in itself lead to neighbouring towns merging into one another due to the particular characteristics of the site as set out above; namely that the site is already in use as a waste transfer depot. Thelwall is some distance from the site and the bulk of the Green Belt would remain.

- 9.11 The council has confirmed that it makes a weak contribution to this purpose, stating that:

*"The site forms a less essential gap between the Warrington urban area and Lymm whereby development of the site would slightly reduce the actual gap between the towns but not the perceived gap. It would not result in the towns merging. The M6 ensures that separation is retained. Overall the site makes a weak contribution to preventing towns from merging."*

- 9.12 We agree with this assessment.

Purpose 3: to assist in safeguarding the countryside from encroachment

9.13 The development of the site would be firmly enclosed by its physical boundaries, and as set out above is already in commercial use. There would be no encroachment as the totality of the site is currently developed.

9.14 The council has confirmed that it makes a weak contribution to this purpose, stating that:

*"The site is not adjacent to the settlement and is fully surrounded by countryside and the wider Green Belt however it is enclosed by existing residential and industrial development in the Green Belt to the north, east and west. The site is connected to open countryside to the south. The site has predominantly durable boundaries consisting of Stockport Road to the north and the former disused railway line which is now a heavily tree lined footpath to the south. These durable boundaries could prevent encroachment beyond the site if the site was developed. To the east and west, the limits of development are demarcated by tall mature trees. These may not be permanently durable boundaries however there is already existing encroachment to the east and west which enclose the site. The existing land use consists of ADS recycling with the site being used for waste disposal, recycling and skip hire. This site is therefore completely developed. It has more than 50% built form, there are no long line views and the boundaries consist of heavy vegetation, thus it supports no degree of openness. Overall the site makes a weak contribution to safeguarding from encroachment due to its lack of openness as it is completely developed and its limited connection to the open countryside."*

9.15 We agree with this assessment.

Purpose 4: to preserve the setting and special character of historic towns

9.16 This is not applicable in this instance.

Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

9.17 The updated assessment states that it makes a moderate contribution in this respect, as it has done with every site that forms part of the overall assessment. It is a standard answer that is particularly inadequate when considering a site such as this.

9.18 The development of the site would assist in urban regeneration by transforming a brownfield site currently in a use that is perceived to negatively impact upon neighbouring amenity, into a residential use in keeping with the character of the local area.

9.19 It is considered that it would be in the authority's interest to identify potential sites to accommodate the relocation of the existing thriving business. The benefits of doing so are two-fold:

1. As stated above, the relocation of the business would remove a waste transfer station use and replace it with family housing in an authority with an identified acute need for housing.
2. The relocation of the business would secure local jobs going forward as well as providing an opportunity for expansion.

9.20 The justification in the updated assessment concludes that:

*"The site makes a moderate contribution to one purpose, a weak contribution to two, and no contribution to two. In line with the methodology, the site has been judged to make a weak overall contribution. The site makes a weak contribution to safeguarding from encroachment as it is completely developed and has a limited connection to the open countryside. The site makes a moderate contribution to assisting in urban regeneration. It makes a weak contribution to preventing towns from merging and no contribution to checking unrestricted sprawl and preserving the historic town."*

9.21 We agree that the site makes a weak overall contribution to the Green Belt. On this basis, it is recommended that the site is allocated in the emerging plan for residential development. Delivering the site would provide regeneration benefits, as well as providing much needed housing that would contribute to the recommended housing target of 1,332 dwelling per annum (as a minimum target).

9.22 In the absence of residential development coming forward if no relocation site is identified, the site should also be identified and protected for the existing waste and recycling business and consequently benefit from a positive approach to promoting improved waste and recycling facilities within the borough.

## 10. Land north-west of Cherry Lane, Lymm

- 10.1 The site is approximately 3.2ha in area and is within the ownership of our client. It is a greenfield site currently used for agricultural purposes. A site location plan is appended at **EP9**.
- 10.2 The site is bounded by Cherry Lane to the south-east, and agricultural land to the north and west. An existing dwelling is located within the southern part of the site. The M6 and M56 junction is located to the south of the site, and can be accessed via Cherry Lane.
- 10.3 Our client's site is detached from the urban area and is not of a sufficient scale to comprise a strategic allocation in isolation. However, Green Belt land to the north, north-east and west of the site have been promoted by other parties for development. Our client's land is available, and could come forward as part of a wider allocation for housing and/or employment use.
- 10.4 The site is not physically constrained by flood risk, ecological issues or topography and has good access to the surrounding highway network; particularly the M6 and M56 junction a short distance to the south. The site is available and suitable for residential development, in line with local and national planning policy. Only the existing Green Belt designation prevents the site coming forward now.
- 10.5 We reviewed the council's Green Belt assessment (October 2016) and noted that the site formed a part of parcel LY26. This was identified in the assessment as having a 'strong contribution' to the Green Belt. It is identified in the updated assessment published as part of this consultation as R18/113. However, and similar to site R18/108 above, there is no assessment provided in the document. Similarly, there is no reference to the site name. We assume this is an error on the council's part. It is identified on the map in the Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites - July 2017) in green, which means the council still considers it to make a 'strong contribution' to the Green Belt.
- 10.6 It is recommended that the council assesses the site on its own merits as soon as possible, as it is a logical site for residential or employment development as part of a wider mixed use allocation. In the absence of new evidence, we repeat our representations to site LY26 below.
- 10.7 The 'Justification for Assessment' column in the assessment of LY26 states that:

*"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 degree of openness and there are nondurable 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."*

10.8 Parcel LY26 was therefore concluded to make a 'strong contribution' to the Green Belt.

10.9 The above conclusion appears to be inconsistent with the assessment against the purposes, particularly in the context of the site being assessed as making 'no contribution' to three out of the five Green Belt purposes. We consider that it actually makes a 'weak' contribution to the Green Belt purposes overall.

10.10 We therefore propose that the site is released from the Green Belt and allocated for development as part of a wider allocation for housing and/or employment use.

## 11. Appendices

- EP1. Site location plan – Disused railway line, Latchford
- EP2. Concept layout plan - Disused railway line, Latchford
- EP3. Scoping Report - Disused railway line, Latchford
- EP4. Site location plan - Land to the north of Stockport Road, Thelwall
- EP5. Site location plan - Land at Walton Lea Road, Stockton Heath
- EP6. Site location plan - Land to the east of Hough's Lane
- EP7. Site location plan - Land to the south of Westbourne Road
- EP8. Site location plan - ADS Recycling, Camsley Lane, Thelwall
- EP9. Site location plan - Land north-west of Cherry Lane, Lymm

EP1











EP2



## **Station Road Project**

Redeveloping Latchford

# Concept design



Residential  
Commercial

Community  
Residential & Commercial Use

Existing Road/Path  
Green Space

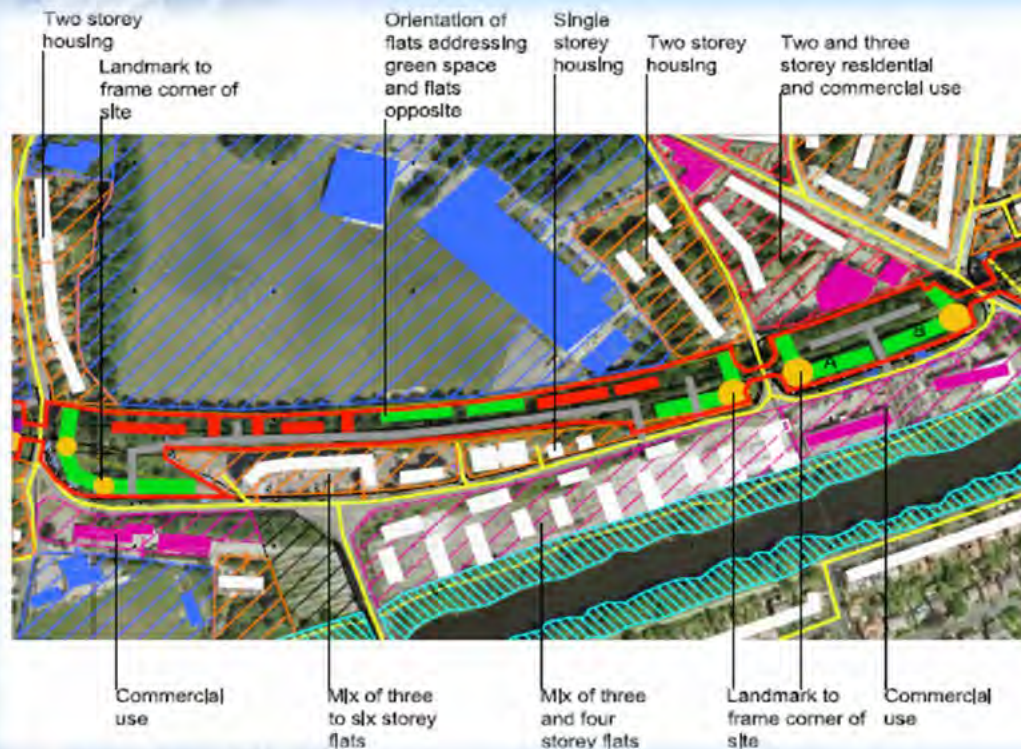
Grain of Residential Development  
New Access Roads



AREA 2

AREA 1

AREA 3



Three storey mixed use (indicated green) to complete perimeter block and match existing character. Ground floor commercial use, first and second floor residential flats.

Terraced accommodation (indicated red) and three storey flats (indicated green) to continue the linear form.

Approx number of apartments (allowing a density of 80 units per hectare) total 105 dwellings.

Approx area of non residential accommodation 1950sqm/ 21000 sqft (ground floor of blocks labelled A&B)

Approx number of terraced / mews house (allowing a density of 40 to 45 dwelling per hectare) total 22 to 25 dwellings

Access to centre of mixed use block off Station Road avoiding two major junctions either side of the site. Potential access to residential side also off Station Road.





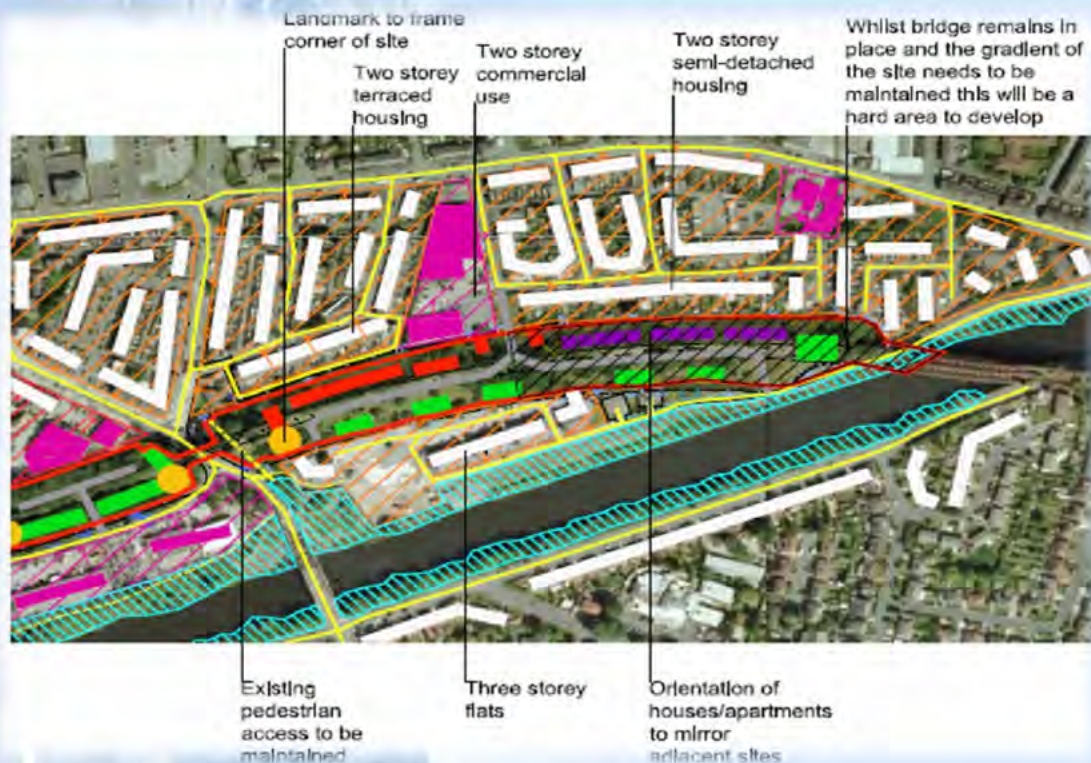
Two storey semi-detached housing (indicated purple) and linked terrace housing (indicated red) to match surrounding housing above and below the site.

Approx number of houses (allowing a density of 35 to 40 units per hectare) total 42 to 48 dwellings.

Due to the character of this section it is not proposed to include any non residential dwellings or apartments.

Improve linkage of pathway from Woolacombe Close to Blackley Close

Form a new linkage from site to Linear Park and creation ground beyond.



A mix of two storey terraced housing (indicated red), two storey semi-detached housing (indicated purple) and three storey apartments (indicated green) to reflect the character of the adjacent sites.

Approx number of apartments (allowing a density of up to 80 dwellings per hectare) Total 52 dwellings

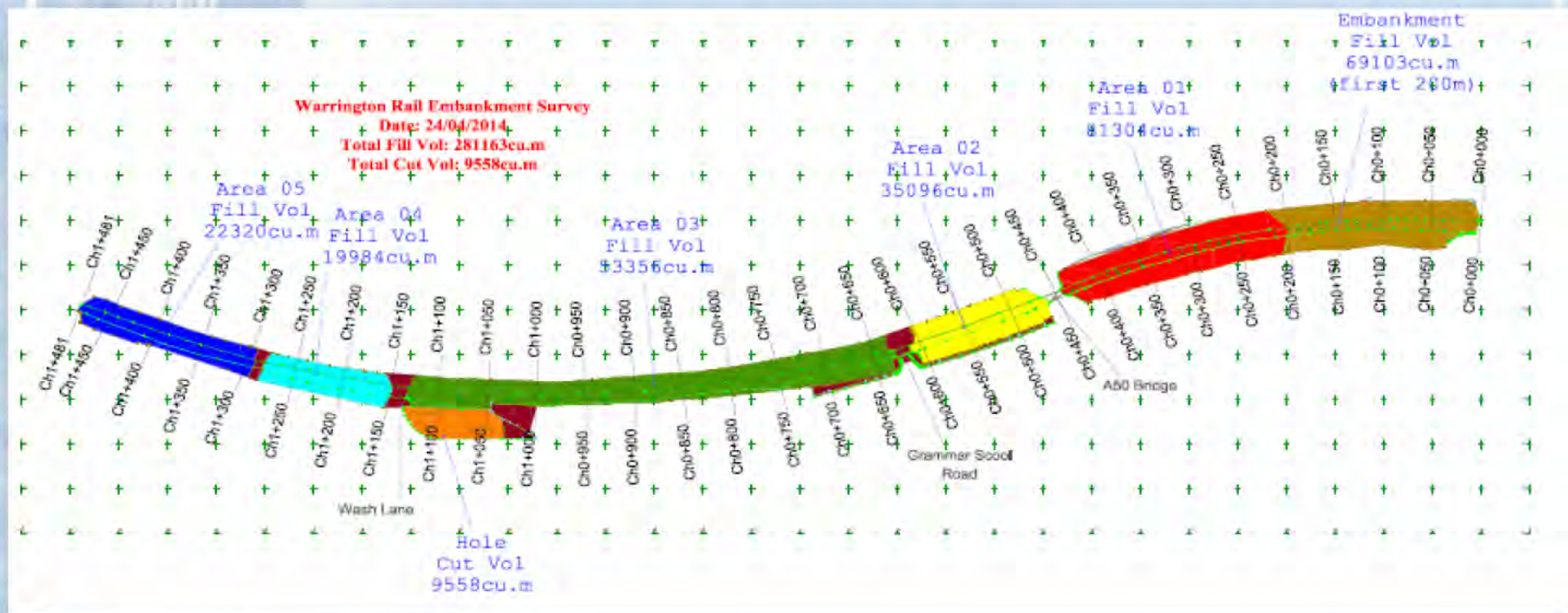
Approx number of terraced houses (allowing a density of 40 to 45 dwellings per hectare) Total 22 to 25 dwellings

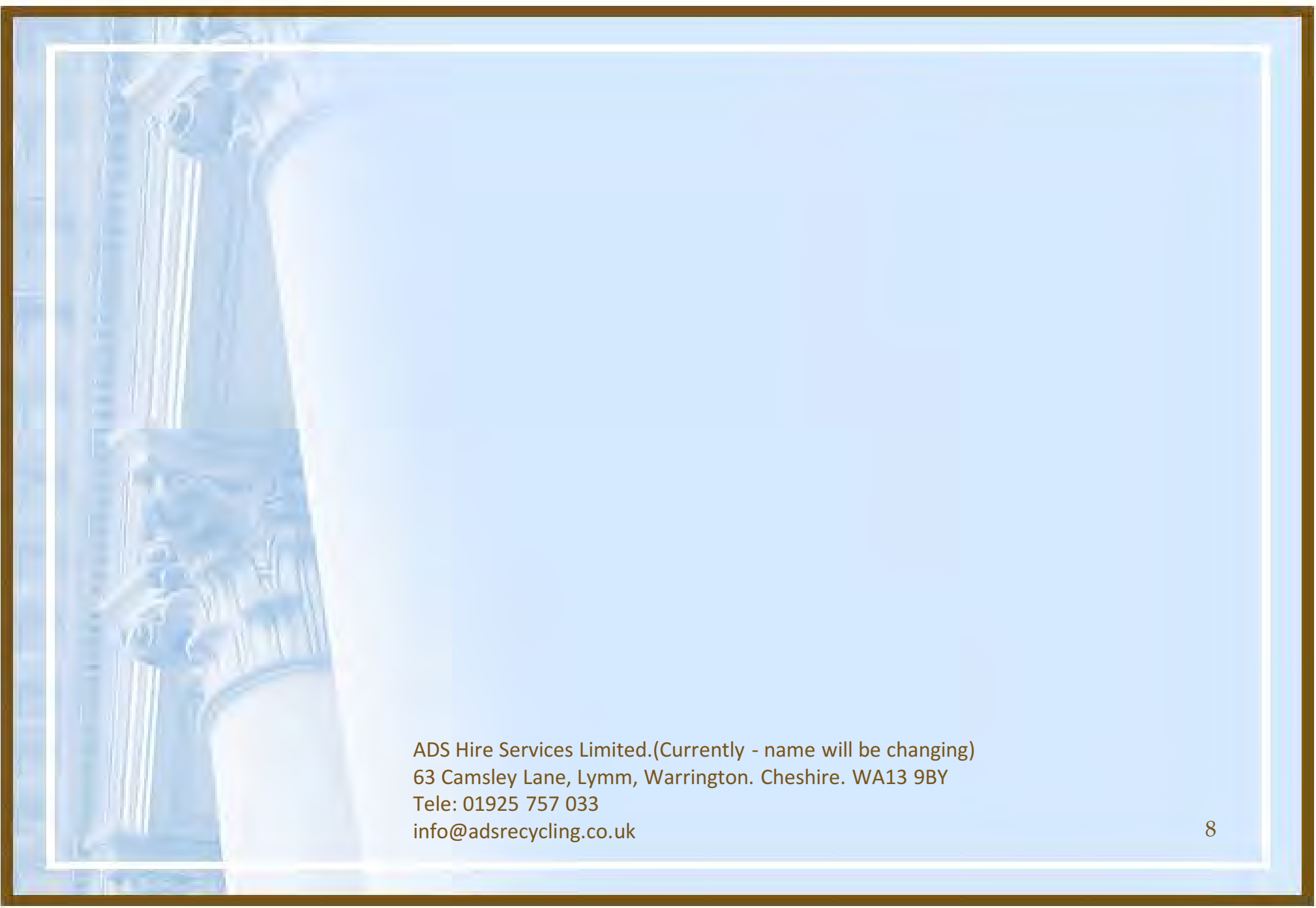
Approx number of semi-detached houses (allowing a density of up to 35 dwellings per hectare) total 20 dwellings

Due to the character of this site it is not proposed to include any non residential dwellings or apartments.

Potential vehicle access to site from Dover Road via existing vacant site, other potential access from existing residential road.

# Survey details





ADS Hire Services Limited.(Currently - name will be changing)  
63 Camsley Lane, Lymm, Warrington. Cheshire. WA13 9BY  
Tele: 01925 757 033  
[info@adsrecycling.co.uk](mailto:info@adsrecycling.co.uk)

EP3



## Town and Country Planning (Environmental Impact Assessment) Regulations 2011

### Scoping Report

Proposed mixed use development incorporating  
residential development of up to 280 dwellings and mixed  
commercial uses

Disused railway line, north of Station Road, Latchford

For ADS Estates Ltd

EP ref: 9216

Emery Planning  
2-4 South Park Court, Hobson Street  
Macclesfield, SK11 8BS  
Tel: 01625 433 881  
[www.emeryplanning.com](http://www.emeryplanning.com)




unlocking development opportunities

Project : 9216

Site address : Disused railway line,  
north of Station Road,  
Latchford

Client : ADS Estates Ltd

Date : March 2015

Author : 

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence. Technical input has been provided by the consultants listed in the document.

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## 1. Introduction

- 1.1 Emery Planning is instructed by ADS Estates Ltd to request a formal Scoping Opinion under regulation 13(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, in respect of the subject site.
- 1.2 As required by the regulations, this request is accompanied by '*a plan sufficient to identify the land*' and '*a brief description of the nature and purpose of the development and of the possible effects on the environment*'.

## 2. Description of the Site, Surroundings and Background

- 2.1 The proposed development site forms part of the former Warrington and Altrincham Junction Railway that was in operation from 1 November 1853 to 7 July 1985.
- 2.2 The site forms a raised linear strip of land located to the north of Station Road and Woolacombe Close and can be divided into three distinct areas (see EP1 and EP2). The embankment comprises semi-natural woodland, scrub, semi-improved grassland, continuous bracken, tall ruderals, ephemeral/short perennials, introduced shrubs and invasive plant species (Japanese knotweed). In many places the old railway line and rail infrastructure are still evident.
- 2.3 Area 1 is the central area between Wash Lane and Knutsford Road and crosses Grammar School Road by way of a sandstone bridge. To the north of the central section of the site is Sir Thomas Boteler High School. The playing fields of which adjoin the embankment and are identified in the Unitary Development Plan (UDP) as an Urban Green Space. To the south Cantilever Gardens, a modern residential development of 2 and 3 storey apartments buildings adjoins the site. The remaining boundaries with Station Road comprise vacant land and scrub. Area one extends to approximately 2.55 hectares.
- 2.4 Area 2 is the western section of the site to the north of Woolacombe Close (made up of predominately 2 storey housing) and is bounded to the north by further residential development in Blackly Close and Our Lady's Primary School. Area 2 extends to approximately 1.21 hectares.
- 2.5 Area 3, the eastern section, extends to approximately 1.1 hectares and forms an area of land east of Knutsford Road to the north of residential development in Mersey Path and south of mixed residential and commercial development on Dover Road and Belmont Close.

- 2.6 The total site area detailed on the attached site location plan extends to approximately 4.86 hectares.
- 2.7 Whilst part of the former line between Latchford and Broadheath now forms part of the Trans Pennine Trail this land is disused, has no formal public access and does not contain any public rights of way.

### The Proposal

- 2.8 The proposals involve the development of the 3 separate parcels of land independently in a character and form best suited to its surrounds whilst delivering a cohesive area of high quality mixed residential and commercial development across the site as a whole.
- 2.9 Area 1 is proposed to accommodate the highest density of development in keeping with the surrounding development to the south at Cantaleiver Gardens and has capacity to accommodate in the region of 100 apartments, 1950sqm of commercial space as well as a small number of terrace and mews properties. Access to this area would be taken from Station Road.
- 2.10 Area 2 is considered to lend itself to more traditional 2 storey development in the form of approximately 50 semi-detached dwellings with access taken from Wash Lane.
- 2.11 Area 3 would gain access via an existing vacant site on Dover Road and would again be appropriate for a traditional form of development encompassing a mix of two storey semi-detached and terrace properties; as well as the number off three storey apartments. This would reflect the character of the adjacent sites. The area is likely to be able to accommodate in the region of 50 apartments; 25 terraced properties and 20 semi-detached properties.
- 2.12 Each of the sites would also encompass public open space, landscaping and an appropriate level of car parking.
- 2.13 Initial ecological assessment of the site has identified it to be of value to the local area as a wildlife corridor as it provides a means of dispersal for many species between fragmented habitats. As such the development proposals would be designed to minimise the impact of the development by maintaining complete connectivity through the site and compensating for any loss to the width of the site by enhancing the retained areas for the benefit of wildlife.

- 2.14 Given the current raised nature of the site, in the form of an embankment ranging between 30 and 70 metres wide, in order to make the site developable there would be a degree of excavation and levelling required. The proposals include lowering the level of the embankment to varying degrees across the site to make it structurally sound and development at an appropriate level to be in keeping with its surroundings. The levelling of the site would involve both an element of 'cut and fill' on site from areas of embankment to areas of depression, as well as transportation of a percentage of the overburden off site. Any material transported off site would be reused as aggregate.
- 2.15 In summary, the site offers significant opportunities to bring this former railway land, which has remained unused for some 30 years, back into productive use to create an attractive and sustainably designed residential and commercial development within walking/cycling distance of local services and facilities. The development would also provide a sustainable source of recycled base material for use in construction of a road development in Runcorn.
- 2.16 The mixed residential and commercial development of the site will enable regeneration of this area and greater connectivity between Latchford and the canal and removing a significant physical barrier within the community. It would also help contribute to the Council's 5 year housing land supply and importantly the affordable housing needs of the Borough. It would also comply with the sustainable-led aims of the Government as set out in the National Planning Policy Framework (NPPF).

### 3. Need for EIA

- 3.1 A screening opinion has not been sought from the Council but has been undertaken by the consultant team and has for the following reasons concluded that the proposals represent EIA development. Consequently an ES should be provided to comprehensively assess any likely impacts of the proposed development within the scope set out in section 4 below.

#### EIA Screening Analysis

- 3.2 In assessing whether an EIA is required, we have systematically followed the regulations and guidance published in the National Planning Practice Guidance (NPPG) (March 2014). The main considerations are set out in a logical order as follows:

**Step 1 – Is the proposal Schedule 1 development?**

3.3 According to the EIA Regulations and Guidance, the application does not constitute Schedule 1 development.

**Step 2 – Is the proposal Schedule 2 development?**

3.4 The site exceeds 0.5 hectares and the development may therefore be referred to as Schedule 2 development by virtue of its nature and size (i.e. an Urban Development Project exceeding 0.5 hectares thus relating to section 10 of Schedule 2).

3.5 On the assumption that the application can be referred to as Schedule 2 development, we have applied the appropriate tests laid down in Schedule 3 of the Regulations and the NPPG below.

**Step 3 – Is the proposal in a sensitive area?**

3.6 According to the Regulations and NPPG sensitive areas are defined as:

- Sites of Special Scientific Interest (SSSI's);
- National Parks;
- The Broads;
- Areas of Outstanding Natural Beauty;
- World Heritage Sites; and
- Scheduled Monuments.

3.7 It is clear from the policies of the adopted Core Strategy and our knowledge of the area that the location of the proposed development does not fall within any of the above categories.

**Step 4 – Is the proposal likely to have 'Significant Effects' on the environment?**

3.8 To address this it is necessary to screen Schedule 2 developments against the specific 'indicative criteria and thresholds' listed in the Annex: Indicative Screening Thresholds of the NPPG (ID 4-057-20140306). In addition, Schedule 3 of the EIA Regulations sets out the selection criteria which must be applied when determining whether a development is likely to have significant effects on the environment which may justify an EIA.

3.9 There are three key tests which are to be undertaken:

- consideration of the characteristics of the development;
- consideration of the location of the development; and,
- consideration of the characteristics of the potential impact.

3.10 Accordingly, we have considered these tests and applied the sub-criteria for each in turn:

### **Characteristics of the Development**

#### (i) Size of the development

3.11 In relation to the size thresholds identified in the Annex, the site has previously been intensively developed by virtue of the bunding of the land to form the embankment however, this bunding would largely be removed by the proposed development. The built development area is not in excess of 5 hectares and the development would not yield in excess of 1,000 dwellings (this being the normal capacity figure triggering the need for an EIA).

3.12 Therefore, the proposed development itself would not have a significant urbanising effect as defined by the guidance of the NPPG Annex reference above and does not require an EIA based on its size.

#### (ii) Cumulative effects with other developments

3.13 The proposed development site is located within the developed centre of Warrington where there is little further development potential. There is some scope for future redevelopment of the land to the South of station Road alongside the Manchester Ship Canal however we are not aware of any committed development within this area which should be considered as part of a cumulative assessment for the purposes of EIA. As such it is not considered that the proposed development would have any adverse cumulative impact on the area for the purposes of an EIA.

#### (iii) Use of natural resources

3.14 The site is previously developed comprising a former railway line embankment where in places rail infrastructure remains visible. The land would have been artificially raised to its current height as some point in the 1800s.

3.15 The site has since the closure of the railway line in the 1980s been unused and has become self-seeded with trees, shrubs and scrub.

- 3.16 Whilst the proposed development would result in the loss of the self-seeded trees they are of relatively poor quality and opportunities exist to provide better quality replacement planting in key areas.
- 3.17 There are no other likely effects on the use of natural resources in the area and it is not considered that the loss of existing planting would be significant for the purposes of an EIA.

(iv) Production of waste

- 3.18 The proposed development would as stated necessitate levelling/regarding of the site. It is anticipated that this would result in the redistribution of some 94,000 cubic metres of material within the boundaries of the site as well as the exportation of in the region of 118,000 cubic meters of material off site.
- 3.19 Whilst a proportion of the 'over burden' to be removed is surplus to requirements on site this does not mean that it should be defined as waste. The material to be removed has a viable and identified end use as aggregate and would not be a waste product requiring disposal.

(v) Pollution and nuisances

- 3.20 In terms of any existing ground contamination or potential contamination (as referred to in the NPPG Annex: Indicative Threshold Criteria (ID 04-057-20140306)) given the nature of the site and that the embankment is made land topped with a former railway line there is a likelihood that there may be pockets of contamination within the site. As such prior to any application a phase 1 and, if required phase 2 contaminated land assessment would be undertaken to assess and address any possible areas of contamination. Once initial survey information has been obtained an appropriate remediation and management strategy can if necessary be identified in liaison with the Council's pollution control officers.
- 3.21 Due to the proposed residential end use there is no likelihood of significant pollution or nuisance arising from the proposed development for purposes of an EIA.
- 3.22 The site clearance and construction of operations can be controlled through suitable Environmental Management Plans (EMPs) or Construction Standards, which can be required and easily enforced by planning conditions.

(vi) The risk of accident

3.23 As far as we are aware there are no hazardous installation consultation zones within the vicinity of the site.

**Location of the development**

(i) The existing land use

3.24 The site comprises previously developed land.

3.25 Both local and national planning policy aim to direct sustainable development to brownfield sites in sustainable urban locations such as this. It will be shown through the application that the incorporation of such land for the development package would accord with the relevant provisions of NPPF and the Core Strategy.

3.26 The proposed development would not affect the setting of any protected or significant buildings, features or landscapes or public rights of way.

(ii) Impact on a relevant abundance, quality and regenerative capacity of natural resources in the area

3.27 The proposed development is within 40m of a local designation of ecological importance (Latchford Sidings Local Wildlife Site). The disused railway acts as a wildlife corridor providing a means of dispersal for species between fragmented habitats and, there is a risk that development will impact commuting wildlife and, as a result indirectly affect the Local Wildlife Site. However, the proposals would be designed to minimise the impact of the development by maintaining complete connectivity through the site and compensating for any loss to the width of the site by enhancing the retained areas for the benefit of wildlife.

3.28 The application would be accompanied by an ecological and arboricultural survey, as well as a landscape appraisal. If necessary, the scale of the proposal could also offer an opportunity for biodiversity offsetting/mitigation.

3.29 The site is more than 1ha in size and will therefore be accompanied by a flood risk assessment in accordance with the requirements of the NPPF/NPPG. The proposed development would not give rise to any impact that would necessitate an EIA.

(iii) Absorption of the natural environment

- 3.30 The proposed development would necessitate significant ground works in order to level the site and integrate it with the surrounding area. The volume of material to be removed from the site is as stated above in the region of 118,000 cubic metres (m<sup>3</sup>) and would be excavated in three phases over three years.
- 3.31 It is anticipated that subject to the granting of planning approval and any other necessary consent, development could commence on Phase one within the year. The phase 1 development would be area 2 as identified on the enclosed survey plan (EP3) (land between the A50 and Grammer School Road. This would require the removal of 35,096m<sup>3</sup> of material in 3899 loads over a 12 month period. This equates to 75 loads per week or 15 per day (Monday to Friday).
- 3.32 Phase 2 would commence later in 2016 and would itself be split into two elements – a) areas 4 and 5 on survey plan EP3 – land to the West of Wash Lane; and b) area 3 – land between Grammer School Road and Wash Lane. It is anticipated that this phase would take a further year to complete. Area a) would require the removal of 42,304m<sup>3</sup> of material which would equate to 4700 loads over that 12 month period i.e 90 per week or 18 per day (Monday-Friday).
- 3.33 The material from area b) (53,356m<sup>3</sup>) would be retained on site and used as cut and fill across the site.
- 3.34 Phase 3 (area 1 on EP3 – Land to the east of the A50) is anticipated to commence in 2017 and take a further 12 months to complete the ground works. 40,652m<sup>3</sup> of material would be removed of site in 4516 loads. This is the equivalent of 86 loads per week or 17 per day (Monday-Friday).
- 3.35 As the ground works would be conducted in phases (each of the three lasting one year) construction could also commence in a phased manner following the completion of the earth works for each phase. The construction phase for each of the development areas is anticipated to take in the region of three years. As such the overall development period for the entirety of the site could be in the region of five years.
- 3.36 Given the nature and scale of the development and the character of the local area (mixed commercial and residential with notable traffic flows) it is possible that the proposals could have a significant impact upon the area in terms of traffic movement and amenity. However any



such impact is likely to be relatively short term during the excavation/construction period and can be mitigated to some degree by planning conditions, EMP's and, good working practices. In the longer term the mixed commercial/residential use of the land is unlikely to be detrimental to the capacity of the environment and the scheme itself has the potential to secure enhancement to local transport infrastructure.

### **Characteristics of potential impact**

#### **(i) Extent of impact**

- 3.37 As stated previously the proposed development requires substantial earth works to level the site which would involve the removal of approximately 118,000m<sup>3</sup> of material from the site over a three year period. The development would also necessitate the demolition of three bridges on routes into/out of Warrington (Knutsford Road, Grammer School Road and Wash Lane). The ground works phase of the development would also be followed by a construction phase likely to take in to the order of three years per phase.
- 3.38 The site is located on the south side of Latchford village and close to the Manchester Ship Canal. The surrounding area is in mixed residential, commercial and educational uses and is relatively densely populated. As such there will be a period of disruption as a result of any proposed development in this area. Whilst this can be mitigated through the use of planning conditions and implementation of a suitable Environmental Management Plan (EMP) and Construction Standards (including agreed routing for all heavy good vehicle movements) the nature of the area and existing traffic situation in the local area, particularly on the A50 Knutsford Road and over the swing bridge is such that this may be significant for the purposes of an EIA.
- 3.39 The visual extent of impact is also likely to be significant. The removal of the embankment and bridges, which are a notable feature in the townscape would open up the vista of this part of Latchford and would have a significant impact upon the visual appearance and character of the area. A landscape and visual impact assessment (LVIA) is required to assess this impact.

#### **(ii) Transfrontier nature of the impact**

- 3.40 The scale of the proposed development ensures that transfrontier impacts will be not applicable in EIA terms for the proposed development. Good construction and site operations will ensure minimal effect to the local environment.

3.41 Whilst the site may be affected by the presence of some contamination it is likely that this will be low level contamination which can be dealt with through the normal planning process. Any affects will be mainly limited to the site itself.

(iii) Magnitude and complexity of the impact

3.42 The proposed development will involve a number of stages which in combination can be considered as complex. These include grading/levelling of the land; transportation of materials generated; construction of development; phased working; and, end use for mixed residential and commercial purposes. How these stages interact through the development of the site may be considered to be significant for the purposes of EIA.

(iv) Probability of the impact

3.43 It is certain that the proposed development will generate impacts which will require mitigation.

(v) Duration, frequency and reversibility of impact

3.44 The proposed development is likely to take in the region of five years to complete over three phases. With regard to frequency any key environmental impacts are likely to relate to vehicle movements, in particular HGV's and the associated noise and air quality impacts which may arise in association with such movements. There is also likely to be substantial landscape impacts as a result of the proposals as the levelling of the embankment which has been in situ for such a period of time and the removal of three bridges will result in a significant change in the character and appearance of the area. This also raises potential heritage issues as one of the three bridges is identified in the UDP as being of local heritage interest. As the disused railway acts as a wildlife corridor there is also a risk that development will impact commuting wildlife and as a result will indirectly affect the Local Wildlife Site (Latchford Sidings) located to the west.

3.45 The impacts associated with traffic, noise and air quality would be relatively short term and reversible subject to use of appropriate conditions and EMPs. Wildlife and habitat impacts may be reversible or irreversible but can in most circumstances be mitigated against with suitable landscape design, retention of important habitat features etc. The landscape changes however will be permanent and irreversible. It is of note that the impacts may be beneficial or adverse and the magnitude of any such affects will need to be fully assessed.

3.46 The magnitude and significance of the above impacts may be significant for the purposes of EIA.

### **Summary/Conclusions**

3.47 In summary, the proposed development built form falls outside Schedule 1 and may be referred to as Schedule 2 development within the EIA Regulations. As such, the tests as set out in Schedule 3 of the EIA Regulations were required to ensure that the likelihood of significant effects warranting an EIA was considered.

3.48 Whilst the mixed residential and commercial end use of the proposed development is not of such a nature or scale that it will breach the Schedule 3 thresholds and criteria it is considered that the works involved in levelling/grading of the site; the period of time this will take; the associated traffic movements (with associated noise and air quality implications) arising from this and the overall change to the landscape arising from the proposals may be considered as significant for the purposes of the EIA Regulations 2011.

3.49 On the basis of the forgoing, Emery Planning have recommended to our clients that any application for the above is accompanied by an Environmental Statement. Below we set out the anticipated scope of the Environmental Statement.

## **4. Scoping – Content of EIA**

4.1 The Environmental Statement (ES) will comprise:

- a project description and consideration of alternatives;
- a planning policy context; and,
- an assessment of environmental effects.

4.2 The main environmental issues will be considered in a series of technical papers. The topics and their scope is summarised below. These will cover the following disciplines.

- 1) Ecology
- 2) Water Resources (flood risk/drainage)
- 3) Transportation
- 4) Noise
- 5) Air Quality
- 6) Archaeology and Cultural/Built Heritage

## 7) Landscape and Visual Impact

4.3 We outline each below.

### Ecology

- 4.4 This work would be undertaken by appropriately qualified ecologists. The ecological impact assessment (EclA) will be carried out with due consideration for the IEM 2006 guidelines.
- 4.5 An initial desk study and site walkover (completed in 2014 by Ascerta) revealed one designated site within a 1km radius of the proposed development site. Latchford Railway Sidings is a designated Local Wildlife Site and is situated less than 40m from the survey area to the west. As the disused railway acts as a wildlife corridor there is a risk that development will impact commuting wildlife and as a result will indirectly affect the Local Wildlife Site.
- 4.6 The survey area comprises semi-natural woodland, scrub, semi-improved grassland, continuous bracken, tall ruderals, ephemeral/short perennials, and introduced shrubs. The site is considered to be of significant value to the local area as a wildlife corridor. In order to minimise the impact of development on the railway corridor complete connectivity through the site would be maintained and compensation habitat for the benefit of wildlife will be created.
- 4.7 In accordance with the 'mitigation hierarchy', the evolving scheme design will seek first to *avoid adverse impacts*, where this is not possible *mitigate impacts* and as a last resort *compensate impacts* (offset).
- 4.8 Habitat creation seeks to compensate any unavoidable loss and, beyond this, to offer enhancement in accordance with the NPPF. Habitat creation follows three key principles – to optimise connectivity through the site and into the local landscape, to optimise structural diversity and to optimise locally appropriate species-richness.
- 4.9 Habitats within the site were found to have significant potential to provide nesting sites for breeding birds. As with the general approach to habitats, bird nesting and foraging habitat will be retained where possible and optimised within newly created areas. Any vegetation clearance required for the proposed development will be undertaken outside of the bird breeding season. Consideration will be given to the installation of bird nesting boxes within the site to enhance its value for breeding birds.

- 4.10 Regarding bats, the vegetation associated with the railway provides a potential foraging and commuting corridor and as such as replacement habitat will be incorporated into any development. The bridges within the site area also have bat roost potential. As such emergence and re-entry surveys will be undertaken (between May-August). If a roost is found then appropriate mitigation will be proposed, Natural England will be consulted and, a license obtained.
- 4.11 As bat activity is expected in the vicinity of the site, due consideration will be given to additional lighting proposed to be installed in the area to ensure potential lighting impacts are minimised. The lighting scheme will comply with guidance from the Bat Conservation Trust away from natural habitats, shielded and at a height which reduces spill sideways (See Bats and Lighting in the UK-Bats and The Built Environment Series, 2009). The value of the site for bats can be enhanced by the installation of artificial bat roost boxes.
- 4.12 No great crested newts were recorded during the 2014 site however Reasonable Avoidance Measures would be recommended to reduce the risk to reptiles as the site is developed. For example all potential refugia and basking areas should be removed from the development footprint by hand by a suitably experienced ecologist; and before development works a destructive search will be provided to ensure reptile species are considered during construction.
- 4.13 Evidence of badger activity was recorded during the field assessment. A distinct Method Statement would be provided to avoid any adverse impacts on this species during site clearance.
- 4.14 Badgers and their setts are afforded full protection under the Protection of Badgers Act 1992. Therefore, as badgers are present with the site, due consideration is required to ensure sufficient mitigation is implemented. This may, if required, include creation of artificial badger setts and relocation of animals under license from Natural England.
- 4.15 The draft masterplan incorporates areas of open green space and wildlife habitat. Appropriate planting and management throughout the development will form part of the mitigation and enhancement package.

### Water Resources

- 4.16 An assessment of potential impacts on the local hydrological environment, including surface waters, groundwater and flood risk will be undertaken. Where activities on site can be

reasonably linked to hydrological receptors a risk based approach will then be used to determine whether these are of no concern or whether mitigation and / or further assessment are required.

### Transportation

- 4.17 A full assessment of the potential impacts upon the surrounding transport network will be undertaken as part of a Transport Assessment. This will assess the impact of the additional trips associated with the proposed development in relation to a range of modes of travel, i.e. walking, cycling, public transport, private vehicles and HGV's.
- 4.18 The Transport Assessment will be produced in line with the Guidance on Transport Assessment published by the Department for Transport in March 2007. The scope of the assessment will be agreed with Borough Council, as highway authority, and will include assessments of the following:
- Relevant transport planning policies;
  - Existing transport conditions (road network, pedestrian and cycle routes, public transport provision);
  - Predicted trip generation for all modes of transport;
  - Impact upon the road network.
- 4.19 Traffic surveys will be used to establish baseline traffic flows. Accident data will also be obtained from the highway authority.
- 4.20 A Framework Travel Plan will also be prepared to accord with national and local travel planning guidance. This will identify the measures proposed to reduce the role of the private vehicle and encourage travel by other, more sustainable, modes of transport. Routing plans will also be prepared and agreed for the proposed export of material from the site.

### Noise

- 4.1 The noise chapter will cover the assessment of noise impact of the development, focussing on calculated changes in traffic noise on existing roads generated by the development. The chapter will include a section on the excavation and construction phase and measures to be deployed to control the impact of excavation/construction site noise.

- 4.2 An assessment of traffic noise on the proposed residential development will also be carried out but this does not lend itself to incorporation within the noise chapter itself. Therefore this aspect, including any necessary measures to mitigate noise impact on the development, will be presented as a separate assessment report in the form of a technical appendix to the noise chapter.
- 4.3 A comprehensive baseline noise survey will be carried out at relevant locations on the development land. This will include daytime noise monitoring for a sample of existing residential areas that border the site, in respect of the assessment of construction site noise impact. In terms of assessing noise impact on the proposed residential development, the baseline noise survey will include traffic noise from Knutsford Road (A50), Station road, Grammer School Road and Wash Lane for representative periods of the daytime and night/early morning.
- 4.4 The construction noise assessment will be qualitative taking into account the 'ABC' method in BS 5228-1:2009+A1:2014 and focusing on measures to be deployed to minimise excavation/construction noise impacts in accordance with the advice given in that document.
- 4.5 The assessment of 'operational noise' will be in the form of a comparative study i.e. evaluating the impact of changes in traffic noise on a sample of existing roads in the area due to traffic generated by the development. Comparative traffic noise calculations will be undertaken based upon the relevant guidance document 'Calculation of Road Traffic Noise', 1988 and will rely on traffic data to be provided by the transportation consultant. The assessment of significance of impact of any changes in traffic noise for existing dwellings on these roads will take account of the IEMA 'Guidelines for Environmental Noise Impact' 2014.

### Air Quality

- 4.6 The air quality assessment will consider the following:
- potential impacts on local air quality and existing receptors arising from increased traffic emissions during the operational phase;
  - potential impacts of local air quality on new receptors to be introduced as part of the development; assessment to consider both traffic emissions and other local industrial emissions;
  - potential impacts of fugitive dust and PM10 on existing receptors during the extraction/construction phase.

4.7 The assessment would be undertaken in accordance with:

- Development Control: Planning for Air Quality (2010 Update), Environmental Protection UK (EPUK)
- Guidance on the Assessment of Dust from Demolition and Construction (2014), Institute of Air Quality Management (IAQM)

4.8 The assessment would be undertaken through the following methodology:

- site visit and walkover of the surrounding area; to include assessment of key roads; assessment of road geometry, junctions and roundabouts and likely vehicle speeds;
- review of WBC air quality reports and monitoring data;
- review of other baseline air quality data, including existing potential pollution sources and local weather conditions;
- review of traffic flows and Transport Assessment;
- assessment of airborne dust assessment associated with construction works;
- assessment of vehicle emissions associated with development on new and existing receptors;
- preparation of mitigation proposals; and
- identification and assessment of the potential air quality impacts of the development proposals, in terms of magnitude and significance.

4.9 The assessment of vehicle emission impacts would be undertaken using an atmospheric modelling approach (ADMS-Roads) using the latest available vehicle emission factors. The approach would be agreed in advance with the relevant Air Quality Officer.

### Landscape and Visual Impact

4.10 This is to be undertaken by suitably qualified Landscape Architects registered by the Landscape Institute and with experience in assessing landscape, townscape and visual impacts for a wide variety of schemes. The assessment would consist of two separate, but interlinked issues as follows:

- Landscape impacts – the direct impacts upon specific landscape elements within and adjacent to the site, the overall patterns of the landscape elements which give rise to the landscape character of the site and its surroundings and the impacts upon any special interests in and around the site;



- Visual impacts – the direct impacts of the development upon views in the landscape and overall impact on visual amenity.

4.11 Potential impacts include:

- Short term visual disturbances during the excavation/construction phase;
- Change in character of site;
- Changes to views from a number of residential properties surrounding the site;
- Changes to view from public footpaths bordering the site.

4.12 The landscape and visual assessment is to be undertaken in accordance with:

- Guidelines for Landscape and Visual Impact Assessment, Landscape Institute and Institute of Environmental Management and Assessment (IEMA), 2013; and
- An Approach to Landscape Character Assessment, Natural England, October 2014.

4.13 The assessment methodology adopted would consist of a combination of desktop and field studies as follows:

- A review of statutory plans and other data recording relevant designations and planning policies for the area;
- A data trawl search for statutory and non-statutory landscape designations including definitive rights of way in the area;
- An assessment of the landscape character of the site and the surrounding area, together with the sensitivity to accommodate change;
- A visual appraisal of the site and its surroundings, including analysis to determine the visibility of the site from surrounding areas and to identify key viewpoints from publicly accessible locations. This includes the production of a Zone of Theoretical Visual Influence (ZTVI);
- The preparation of mitigation proposals with the aim, where possible, of avoiding or reducing significant adverse landscape or visual effects; and

- Identification and assessment of the potential landscape and visual effects of the development proposals, in terms of their magnitude and significance.

4.14 The significance of impacts will be determined by assessing:

- the sensitivity of the affected landscape;
- the sensitivity of the visual receptor; and
- the magnitude of the potential change that would occur.

### Archaeology and Cultural Heritage

4.15 This chapter will assess the potential effect of the proposed development on all heritage assets both within and near to the site.

4.16 Initial assessment of various online sources indicates that there are no designated assets (Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Registered Battlefields) within the site boundary. However the railway bridge at Knutsford Road is noted in the Unitary Development Plan (Annex 10) as being a structure of local importance of architectural or historic interest. This bridge is proposed to be demolished as part of the proposed development. However the presently bridge acts to constrain highway flows in the local area and its removal could offer the opportunity to improve highway convenience and safety. The significance of this will be fully considered against the requirements of the NPPF as part the assessment.

4.17 A number of Listed Buildings are located within 1km of the site boundary. However, these are all either within an urban context or far enough away from the site so that there is unlikely to be any impact upon their settings or significance. Nevertheless, all the Listed Buildings will be considered in detail as part of the baseline assessment.

4.18 Archaeological resources are susceptible to a range of impacts during development. These relate to works associated with site preparation as well as construction related activities, including:

- Excavation and site clearance activities that disturb archaeological remains;
- Excavation that extends into archaeological sequences;
- Piling activities resulting in disturbance and fragmentation of the archaeology;
- Dewatering activities resulting in desiccation of waterlogged remains and deposits.

4.19 The implications, of these actions will be discussed and significance criteria allocated to any identified impact.

4.20 In terms of the effects on cultural heritage, the effects of the development can be direct, such as loss or damage to a heritage features, or indirect, including the effect on the setting of a designated or undesignated heritage asset. This component of the assessment will be cross referenced with the English Heritage guidelines for setting assessments and the landscape and visual assessment. Any such impacts will be discussed and significance criteria applied.

4.21 The assessment would consist of two separate, but interlinked issues as follows:

- Archaeology impacts – the identification of potential archaeological remains within the site and the likely effects of the development on those remains; and
- Cultural Heritage impacts – the direct effect of a development on historic structures or other upstanding assets within the site (designated and non-designated), as well as indirect impacts to the setting of designated heritage assets within the wider area around the site.

4.22 The assessment methodology adopted would consist of a combination of desktop and field studies in line with the NPPF as follows:

- A review of statutory plans and other data recording relevant designations and planning policies for the area.
- Identification of designated assets (including Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Registered Battlefields) covering the site and surrounding area.
- A data search of the relevant county or civic Historic Environment Record to identify likely archaeological potential for the area.
- A site walkover to assess the archaeological conditions/potential of the site.
- Assessment of the setting and significance of cultural heritage assets on-site and in the surrounding area.
- Recommendation of mitigation proposals (where appropriate) with the aim (where possible) of avoiding or reducing significant adverse effects.

- Identification and assessment of the potential effects to archaeology and cultural heritage in terms of their magnitude and significance.

4.23 The significance of impacts will be determined by assessing:

- The importance of the heritage asset; and
- The magnitude of the potential change that would occur.

## 5. Proposed structure of ES

5.1 A preliminary list of contents for the ES is represented below:

**Volume 1** – Non-technical Summary

**Volume 2** – Main Text:

Introduction

Methodology

Site and surroundings

Project Description

Consideration of alternatives

Planning Policy Context

Assessment of Environmental Effects

- Ecology
- Water Resources
- Transportation
- Noise
- Air Quality
- Archaeology and Cultural/Built Heritage
- Landscape and Visual Impact

Conclusion of Significant Impact and Mitigation

**Volume 3** – Technical Appendices

5.2 The form of each technical paper is to be as follows:

- Introduction
- Legislation and Policy
- Assessment Methodology
- Baseline Conditions
- Evaluation
- Assessment of Impacts and Significance
- Mitigation
- Residual Effects
- Summary and Conclusions

## 6. Summary and Conclusions

- 6.1 The proposed development falls outside Schedule 1 and may be referred to as Schedule 2 development within the EIA Regulations. As such, the tests set out in Schedule 3 of the EIA Regulations require examination to ensure that the likelihood of significant effects warranting an EIA was considered.
- 6.2 It is considered that the proposed development could result in landscape and visual impacts, as well as ecology, transportation, noise and air quality which should be assessed through EIA.
- 6.3 Under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, we would be grateful for receipt of a Scoping Opinion within 5 weeks of registering receipt of the request.
- 6.4 If you require any additional information in order to adopt a Scoping Opinion, please do not hesitate to contact us.

## 7. Appendices

- EP1. Location Plan
- EP2. Concept Design
- EP3. Survey Plan and Sections



EP4

Land on the South Side of Lymm Road, Thelwall

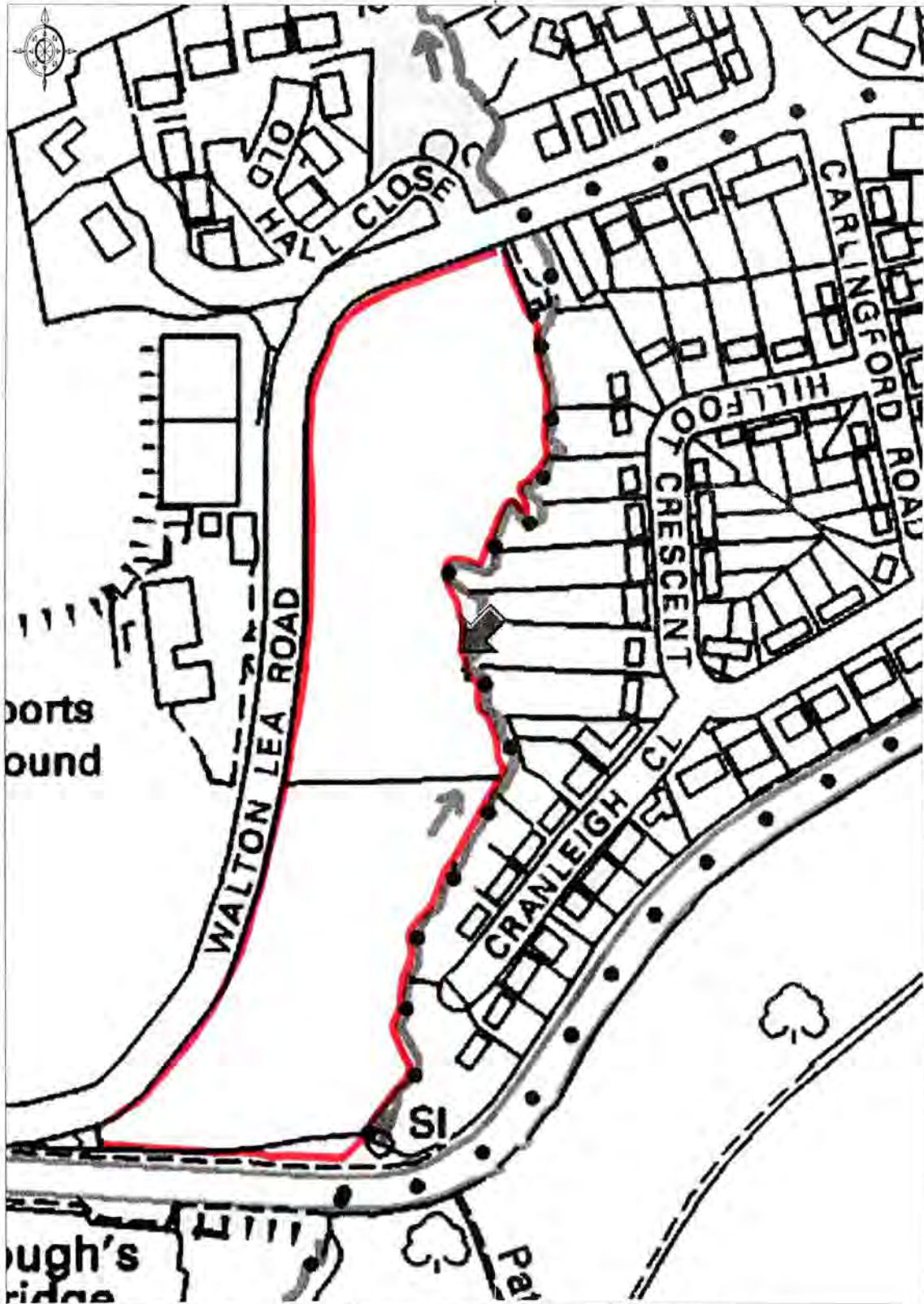


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EP5

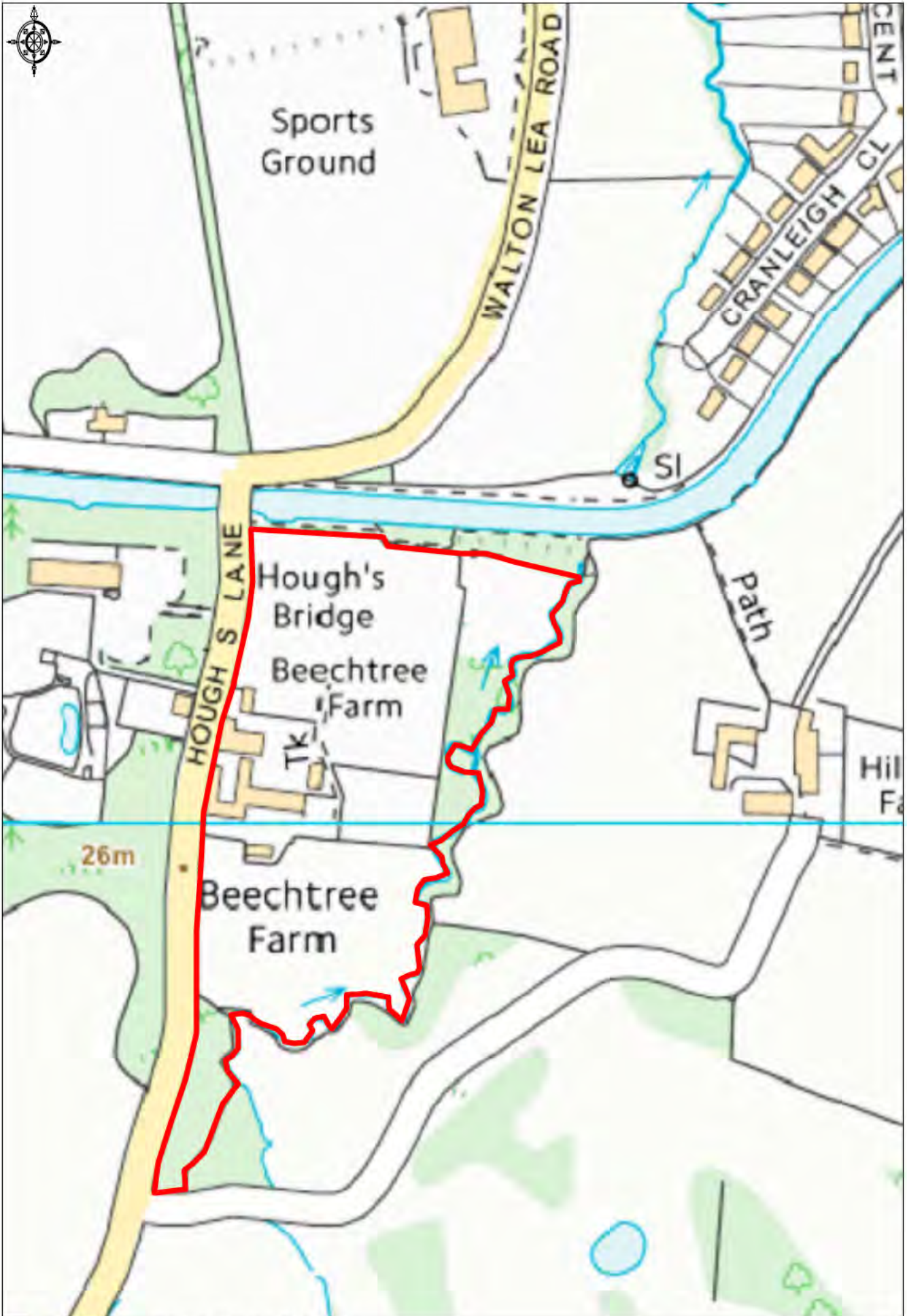
Lea Road, Higher Walton



Ordnance Survey

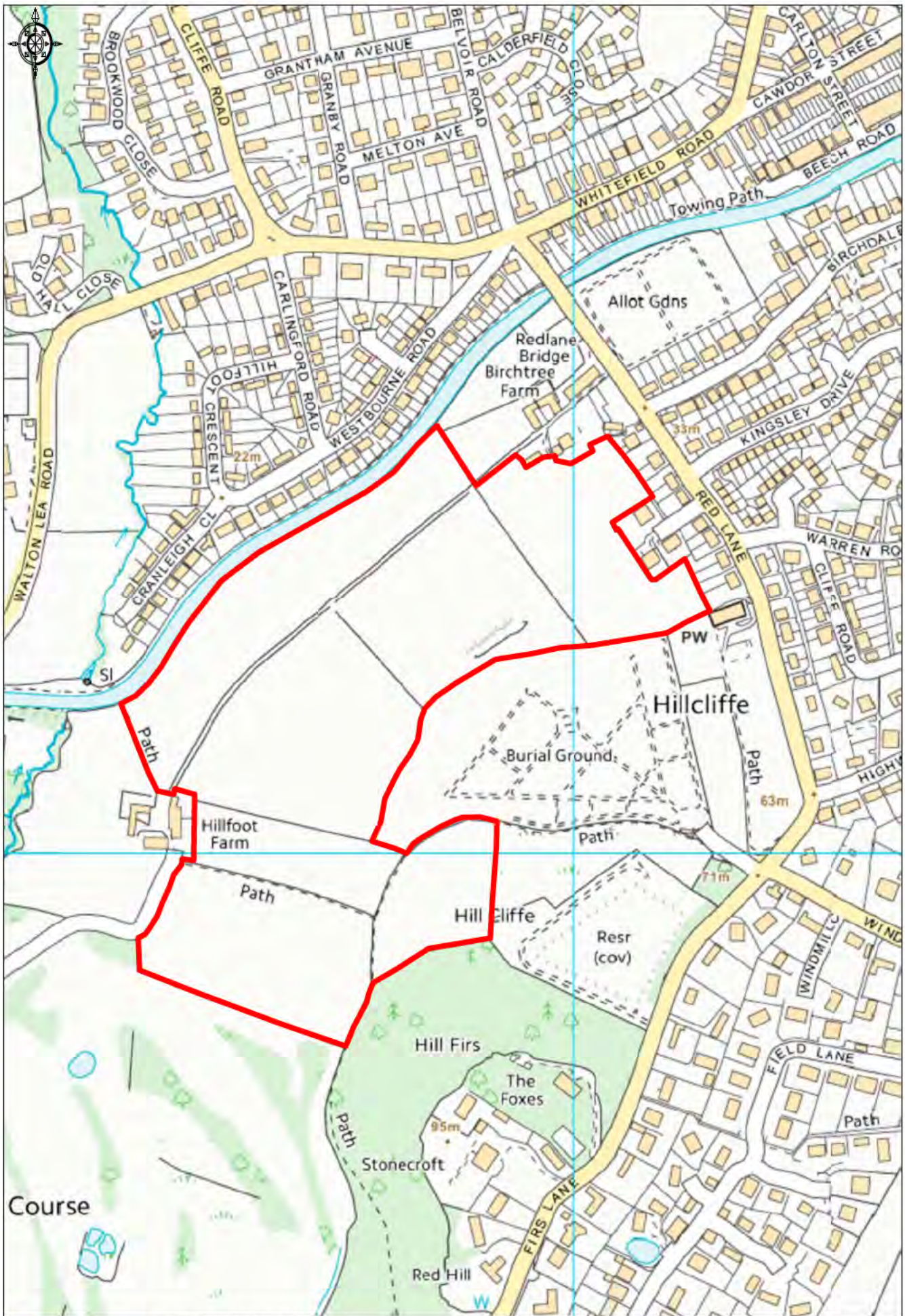
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EP6

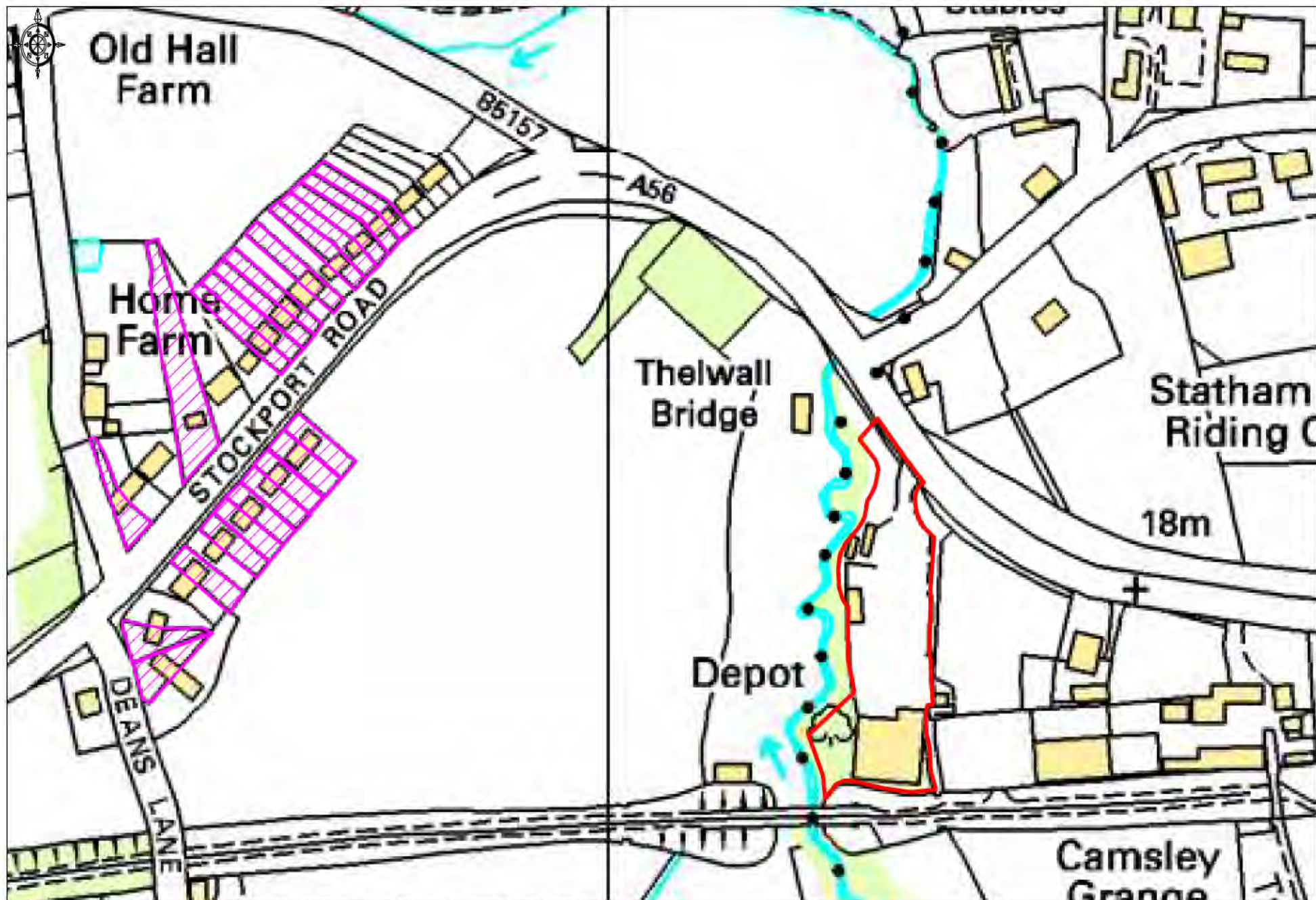


EP7

Land at Hillfoot Farm, Appleton



EP8



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Cherry Lane, Lymm



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