

Warrington Proposed Submission Version Local Plan

Consultation 15th April – 17th June 2019



June 2019

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 - Appendix 6 Land to the North and South of Camsley Lane, Lymm – Development Framework Plan

EXECUTIVE SUMMARY

- i. Warrington Borough Council is consulting on the Warrington Proposed Submission Version Local Plan 2017-2037 from 15th April to 17th June 2019. These representations are made in respect of that document and its supporting evidence base.
- ii. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure. Gladman has previously submitted representations on the Local Plan Review Scope (Regulation 18) consultation in December 2016 and on the July 2017 Preferred Development Options Consultation document.
- iii. Gladman are supportive of the Council in the preparation of this Local Plan and are keen to remain involved throughout the process through to adoption.
- iv. Gladman have a number of land interests within Warrington Borough and these submissions provide further details of these. Gladman are working with the land owners to bring forward high quality residential developments in a number of sustainable locations.
- v. Gladman agree with the Council regarding the need to review and amend the Warrington Green Belt boundaries in order to accommodate the necessary scale of housing growth within the area over the plan period.
- vi. Specifically, Gladman support the proposed allocations OS6 and OS8, which would remove these sites from the Green Belt and allocate residential development to come forward. Gladman are working with the land owners to bring forward these sites for high quality residential development. These parcels of land offer sustainable opportunities for the delivery of housing on the edge of Lymm. As demonstrated through the supporting Green Belt report (Appendix 1) these sites are suitable for release from the Green Belt.
- vii. Gladman recommend that the Plan would benefit from a further degree of flexibility in the form of additional small/ medium sized sites, as this would help to ensure the effective delivery of the plan over the course of the plan period.
- viii. Gladman have provided details regarding two additional site submissions, one to the west of Lymm and the other in Croft. Both of these submissions are supported by a site specific Green Belt reviews (Appendix 1 and 3) prepared by Pegasus. Gladman believe that these sites are suitable for release from the Green Belt and offer sustainable, deliverable and achievable sites which would provide further flexibility and choice in the short to medium term.

1 INTRODUCTION

1.1 Introduction

- 1.1.1 This representation is made by Gladman in response to the current consultation on the Proposed Submission Version of the Warrington Local Plan. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.
- 1.1.2 Gladman has considerable experience in the development industry in a number of sectors including residential and employment development. From that experience it understands the need for the planning system to provide local communities with the homes and jobs that they need to ensure that they have access to a decent home and employment opportunities.
- 1.1.3 Gladman have considerable experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of this experience that the comments are made in this representation.
- 1.1.4 Gladman are supportive of the Council in preparing this Local Plan and are keen to remain involved through the process through to adoption of the Plan.

1.2 Context

- 1.2.1 The Warrington Local Plan Core Strategy was adopted in July 2014. It sets out the planning framework for guiding the location and level of development in the borough up until 2027. The Local Plan Core Strategy was subject to a High Court Challenge, which was heard in February 2015, with judgment given on 19th February by Mr Justice Stewart.
- 1.2.2 The Judge ruled in favour of the council on 6 of the 9 issues that had been challenged. The outcome has resulted in the removal of the following elements of the housing policies from the Local Plan:
- The housing target of 10,500 new homes (equating to 500 dpa) between 2006 and 2027.
 - References to 1,100 new homes at the Omega Strategic Proposal.
- 1.2.3 The Council are in the process of preparing a review of its Local Plan. Following an initial consultation on the scope and contents of the Local Plan Review, and Preferred Development Options Consultation the Council has now prepared its Proposed Submission Version, which is now the subject of public consultation.

1.3 Previous Submissions

- 1.3.1 Gladman submitted representations on the scope and contents of the Local Plan consultation which was conducted in November/December 2016.

- 1.3.2 Gladman subsequently submitted detailed representations, including site submissions, in response to the Local Plan preferred Development Options Consultation which was conducted in the summer of 2017.

1.4 Plan Making

- 1.4.1 The NPPF 2019 (paragraph 35) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that the Warrington Local Plan is:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

2 NATIONAL PLANNING POLICY

2.1 National Planning Policy Framework (NPPF)

2.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework (NPPF 2018). This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft NPPF (2018) consultation.

2.1.2 The 2018 version of the NPPF was itself superseded on 19th February 2019, with the latest version amending policy regarding Appropriate Assessment, as well as other minor clarifications to wording. It is therefore on the basis of the NPPF19 that these representations are made.

2.1.3 The revised Framework introduces a number of major changes to national policy. The changes reaffirm the Government’s commitment to ensuring up-to-date plans are in place which provides a positive vision for the areas they cover. These should outline the housing, economic, social and environmental priorities to help shape future local communities. In particular, paragraph 16 of the NPPF states that Plans should:

“Be prepared with the objective of contributing to the achievement of sustainable development;

Be prepared positively, in a way that is aspirational but deliverable;

Be shaped early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

Be accessible through the use of digital tools to assist public involvement and policy presentation; and

Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”

2.1.4 To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount of variety of land that can come forward where it is needed and that the needs of groups with specific housing requirements are addressed and land with permission is developed without unnecessary delay.

2.1.5 In determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method as set out in the PPG

unless exceptional circumstances justify an alternative approach. It is imperative that the emerging Local Plan is formulated on the basis of meeting this requirement as a minimum.

- 2.1.6 Once the minimum number of homes that is required is identified the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment (SHLAA). In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing need. It states:

“Strategic policy making authorities should have a clear understanding of the land available in their areas through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Strategic plans should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period, and;

b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”

- 2.1.7 Once a local planning authority has identified its housing needs, these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes in paragraph 11 (b) i. considering the application of policies such as those relating to Green Belt and AONB and giving consideration as to where or not these provide a strong reason for restricting the overall scale, type or distribution of development. Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, resulting in net gains across all three. Adverse impacts on any of these dimensions should be avoided, where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered.

- 2.1.8 To be considered sound at Examination the emerging Local Plan will need to meet all four of the soundness tests set out in paragraph 35 of the Revised Framework. Paragraph 35 states:

“Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.”

2.2 Planning Practice Guidance

- 2.2.1 The Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG provides further clarity on how specific elements of the NPPF (2018/19) should be interpreted when preparing local plans. In particular, the updated Housing Needs Assessment chapter confirms that the NPPF expects local planning authorities to follow the standard method for assessing local housing needs, and that the standard method identifies the minimum housing need figure and not a final housing requirement.
- 2.2.2 The calculation of objectively assessed needs (OAN) for housing has been a subject of much debate as part of Local Plan examinations and s.78 appeals since its initial introduction through the NPPF in 2012. To simplify the assessment the Government, through the Revised Framework, has introduced the standardised method which should be undertaken through the 3-stage process outlined in the PPG¹.
- 2.2.3 Notwithstanding the above, it is important to note that whilst the standard methodology to assess housing needs has been introduced, it is likely that this will be subject to further change. In this regard, it is currently anticipated that the standard method will be adjusted to ensure that the starting point in the plan-making process is consistent with the Government’s proposals in Planning for the Right Homes in the Right Places consultation, to ensure that 300,000 homes are built per annum by the mid-2020s. This follows the release of the 2016 based household projections in September 2018, which forecast a lower level of household growth than previously envisaged.
- 2.2.4 Whilst the PPG advises that the standard method is not mandatory, there is an expectation that other methods can only be used in exceptional circumstances. Indeed, the PPG is clear that the standard method only identifies the minimum number of housing required to meet population needs and does not take into account the variety of factors which may influence the housing required in local areas such as changing economic circumstances or other factors which may change demographic behaviour. Where additional growth above historic trends are likely to occur then local planning authorities should include an appropriate uplift to the housing numbers to meet the need in full. It is important that this uplift is undertaken prior to and separate from the consideration of the demographic baseline assessment of need and how much of this need can be accommodated in a housing requirement figure. Circumstances where the need to apply an uplift may be appropriate include, but are not limited to:

¹ PPG – 004 Reference ID: 2a-004-20180913

“Where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. housing deals);

Where strategic infrastructure improvements are planned that would support new homes;

Where an authority has agreed to take on unmet need, calculated using the standard method from neighbouring authorities, as set out in a statement of common ground;

Historic delivery levels where previous delivery has exceeded the minimum need identified it should be considered whether the level of delivery is indicative of greater housing need; and

Where recent assessments such as Strategic Housing Market Assessments suggest higher levels of need than those proposed by a strategic policy making authority, an assessment of lower need should be justified. “

- 2.2.5 In addition, it is also important for local planning authorities to consider the implications the standard method will have on delivering affordable housing need in full. The PPG is clear that the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by market housing led development. If it becomes clear that affordable housing need will not be delivered in full then an increase to the total housing figures included in the plan should be considered where it could help to deliver the required number of the affordable homes.

3 LEGAL REQUIREMENTS

3.1 Duty to Cooperate

- 3.1.1 The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.²
- 3.1.2 The revised Framework has introduced a number of significant changes on how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SOCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The revised Framework sets out that local planning authorities should produce, maintain, and update one or more statement(s) of common ground (SOCG), throughout the plan making process³. The SOCG should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the lengths local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with i.e. unmet housing needs.
- 3.1.3 As demonstrated through the outcome of the Coventry, Mid Sussex, Castle Point and St. Albans examinations, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications.
- 3.1.4 Gladman recognise that the DtC is a process of ongoing engagement and collaboration⁴. As set out in the PPG it is clear that the Duty is intended to produce effective policies on cross boundary strategic matters. In this regard, the Council must be able to demonstrate that it has engaged and worked with its neighbouring authorities, alongside their existing joint work arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. The DTC should result in effective cooperation to ensure that the Housing Market Area's (HMA's) housing needs are met in full. Where necessary, a policy mechanism should be built into the Local Plan to demonstrate that unmet housing needs arising from relevant neighbouring authorities and those with a clear functional relationship will be met during the plan period.

3.2 Sustainability Appraisal

- 3.2.1 In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the

² PPG Reference ID: 61-021-20180913

³ PPG Reference ID: 61-001-20180913

⁴ PPG Reference ID: 9-011-2014036

requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations).

- 3.2.2 The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the emerging Local Plan's proposals on sustainable development when judged against all reasonable alternatives. The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council's decision making and scoring should be robust, justified and transparent.

5 VISION & SPATIAL STRATEGY

5.1 Vision & Plan Objectives

- 5.1.1 Chapter 3 of the Local Plan sets out the vision for Warrington by 2037. In this respect, it identifies six objectives which cover a range of development themes. The introductory text to the objectives outlines how these have been used to shape the spatial strategy and provide a basis for individual planning policies.
- 5.1.2 Objective W1 relates to the sustainable growth of Warrington and outlines that alongside the regeneration of inner Warrington there will be the creation of new sustainable neighbourhoods and that the plan will deliver a minimum of 18,900 new homes, equating to 945pa between 2017 and 2037. Gladman support the use of the phrase minimum, as housing requirements should not be seen as a cap or maximum level of development to be delivered.
- 5.1.3 Objective W2 relates to the revised Green Belt boundaries and maintaining their permanence in the long run. W3 seeks to strengthen and expand the role of Warrington Town Centre whilst W4 looks to provide new infrastructure and services to support Warrington's growth. Objective W5 seeks to ensure high quality design whilst protecting and enhancing the Borough's historic, cultural, built and natural assets. Objective 6 looks to minimise the impact of development on the environment through the prudent use of resources.
- 5.1.4 Whilst Gladman do not dispute, in principle, any of the proposed plan objectives it is important that all of these and the overall vision are capable of being made a reality through the policies and site allocations contained within the Local Plan.
- 5.1.5 Gladman note, that unlike the previous iteration of the plan (Preferred Development Option), no reference is made to enabling the transition of Warrington New Town, to Warrington New City. Aligned with this change the scale of ambition and growth appears to have been somewhat reduced. With the overall housing requirement reducing from 22,260 to 18,900 as set out within Objective W1. Gladman query what has changed to result in the scaling back of ambition, and growth for the area.

5.2 Spatial Strategy

Overall Spatial Strategy

- 5.2.1 The overall spatial strategy for Warrington is set out within Section 3.3 of the Plan, supported by the Key Diagram (Figure 3.1).
- 5.2.2 In terms of meeting the housing needs, the plan proposes a combination of development in the existing urban area and through the release of Green Belt Land (around 7,000 new homes). The overall spatial distribution can be summarised as follows
- Existing Urban Area – around 13,700 new homes.

- Garden Suburb – around 4,200 new homes in the plan period (Green Belt Release).
- South West Urban Extension – around 1,600 new homes (Green Belt Release).
- 'Incremental Growth' across the outlying settlements – around 1,100 new homes (Green Belt Release).

Main Development Locations

5.2.3 The Local Plan outlines the following Main Development Areas:

- Warrington Garden Suburb
- South West Extension
- Waterfront
- Peel Hall

5.2.4 Overall Gladman are supportive of the principles underpinning the Council's spatial strategy and in particular the decision to direct further development to the outlying settlements. However, we note that the Council's approach also places a significant reliance upon the delivery of a few very large sites. The Warrington Garden Suburb and South West Urban Extension are 2 of the 4 main development locations and are proposed to deliver a significant proportion of the total housing requirement over the course of the plan period.

5.2.5 Although Gladman do not object in principle to the plan including these large scale sites, Gladman do raise concerns regarding the scale of delivery proposed within the timescales identified. Large strategic sites such as those proposed through the Local Plan are likely to be complex and have significant lead in times prior to delivering any housing. There would be significant implications if one or more of these main development locations do not come forward as envisaged. The Council need to carefully consider the assumed delivery trajectories for these sites to ensure that they are realistic and that the plan is capable of being fully delivered over the plan period. Further comments regarding the proposed trajectories for these key development areas are provided later within this submission.

5.2.6 Gladman consider it important that a strategy including large strategic sites such as these is complemented by sufficient small / medium sized sites capable of being brought forward in the early years of the plan, in accordance with the NPPF (paragraph 68).

5.2.7 Gladman's experience is that the best way in which to ensure the delivery of the housing target is to maintain a good spread of sites and typologies across the Borough. In allocating sites the Council should be mindful that to maximise housing supply the widest range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to

meet the widest possible range of demand. In summary, a wider variety of sites in the widest possible range of locations ensures all types of house builders have access to suitable land which in turn increases housing delivery.

Outlying Settlements

- 5.2.8 Gladman note that through this iteration of the plan the Council have outlined a series of proposed allocations on the edge of the outlying settlements which will require Green Belt boundaries to be amended for these to be delivered. Gladman support this approach, and in particular the proposed allocation of Land at Pool Lane and Warrington Road, Lymm.
- 5.2.9 Gladman submit that one way of providing greater flexibility and contingency in the Council's strategy would be to direct further growth to the borough's outlying settlements. Medium sized sites in these locations will provide greater choice and competition in the housing market and these sites are likely to be capable of starting to deliver in advance of the Garden Suburb and South West Urban Extension.
- 5.2.10 In particular, we submit that further sustainable growth opportunities exist on the edge of settlements such as Lymm and Croft, as detailed in Section 10 of these representations. Allowing for an increased scale of delivery in these locations could provide additional flexibility through additional allocations, without harming the ongoing function of the Green Belt.
- 5.2.11 It is important that the proposed amendments to the Green Belt boundaries around the outlying settlements result in strong defensible boundaries that are capable of enduring beyond the plan period. Gladman would urge the Council to avoid retaining small parcels of Green Belt land which serve very limited purposes to the Green Belt and that it is of greater importance to create sensible, logical defensible boundaries to the Green Belt moving forwards.

6 POLICIES RELATING TO OBJECTIVE W1

6.1 Policy DEV1 – Housing Delivery

Housing Requirement

- 6.1.1 Policy DEV1 outlines that over the 20 year plan period (2017-2037) a minimum of 18,900 new homes will be delivered. This equates to an average of 945 homes per annum and it is claimed meets Warrington’s housing needs and supports its economic growth potential.
- 6.1.2 Whilst Gladman are supportive of the Council’s decision to promote a higher level of housing (above the standard method baseline) to meet its economic needs, we note that the proposed scale of housing has reduced since the Preferred Development Options consultation. At that time the Council were proposing 22,260 new homes over the same 20 year period, therefore a reduction of 3,360 new homes. The previous consultation document explained that the authority were planning for a level of growth in accordance with the LEP’s Strategic Economic Plan, which is an increased level of growth for Warrington, and tied in with the ambition and objective of the Council for Warrington to transform from a New Town into a New City.
- 6.1.3 Gladman note, as outlined in paragraph 4.1.7 of the Local Plan, that the proposed housing target is around 4% higher than the minimum requirement set by the Government’s Standard Housing Methodology. Paragraph 4.1.8 references the growth strategy set out in the Cheshire and Warrington LEP Strategic Economic Plan as the basis and justification for the higher housing requirement. Gladman support the use this economic growth ambition as a justification for increased housing targets however query how given the previous target of 22,260 was based on this why the current target has been reduced.

Land Supply

- 6.1.4 Gladman note Table 4.1 of the Local Plan which sets out the land requirements for the plan period as follows:
- Annual Target – 945
 - 2017-2037 – 18,900
 - Flexibility at 10% - 1,890
 - Total Requirement – 20,790
 - Urban Capacity – 13,726
 - Green Belt Requirement – 7,064
- 6.1.5 Whilst Gladman welcome the inclusion of an element of flexibility / contingency within the total requirement, we would recommend that rather than being set at 10% this should be a 20% contingency.

- 6.1.6 Any delays in the delivery of the large strategic sites or Green Belt release sites at the outlying settlements could result in this 10% contingency being rapidly reduced to a point where a five year housing land supply could no longer be demonstrated. Gladman recommends that the risks associated with the Local Plan's current housing trajectory could be address by providing headroom of at least 20% above the minimum housing requirement. It is therefore necessary for the Plan to identify further small and medium sized allocations on the edge of the outlying settlements to allow for this.

Housing Trajectory

- 6.1.7 Gladman note that through the Local Plan the Council are proposing a stepped housing trajectory, with the first five years (2017-2021) of the Plan having an annual delivery target of 847 homes and the following 15 years (2022-2037) of the plan having an annual delivery target of 978 homes.
- 6.1.8 Whilst Gladman believe that the proposed stepped approach is not the most growth orientated approach, it is suggested that if this stepped housing requirement is to remain within the plan then it should be made clear that these are minimum figures and if delivery in excess of the lower target in the first five year period is achievable then this should not be restricted. The NPPF is focussed on boosting the supply of housing and as such restrictive policy approaches should be avoided wherever possible.

6.2 Policy DEV2 – Meeting Housing Needs

Affordable Housing

- 6.2.1 Policy DEV2(1) sets out the affordable housing percentage requirements. This states that for residential developments of 10 dwellings or more on sites within inner Warrington the affordable housing requirement is 20% and elsewhere in the Borough and on all greenfield sites the requirement is 30%. Part 2 of policy DEV2 outlines that of the affordable housing provided, affordable home ownership should make up 10% of the total number of homes within the development. Part 3 provides the caveat to this in so far as it states that a lower proportion and/or different tenure split will only be permitted where it can clearly be demonstrated that the development would otherwise not be financially viable.
- 6.2.2 DEV2(4) outlines that affordable housing should be provided on site apart from in exceptional circumstances, Gladman support the caveat provided in this element of the policy enabling sites with exceptional circumstances to provide the affordable housing through alternative means other than onsite.

Housing Type and Tenure

- 6.2.3 Policy DEV2(7) outlines that residential developments should provide a mix of housing sizes and types and that this should be informed by Table 4.3 in the supporting text and any local target set by a Neighbourhood Plan, taking into account site specific considerations.

- 6.2.4 Whilst Gladman note that the housing demand identified in Table 4.3 is a useful basis currently, it is important for the policy to recognise that the needs of the Borough may alter through the course of the plan period and so flexibility is critical to ensure that housing schemes can respond to the current local needs and demands.
- 6.2.5 Gladman believe that recognition of changing needs over time should be highlighted as a caveat in the plan policy. Gladman recommend that this element of the policy should be amended to outline that housing mix should be considered on a site by site basis informed by either Table 4.3 within the Local Plan or the latest available evidence on housing needs.
- 6.2.6 Gladman welcome the caveat included at the end of this policy requirement with regards to site specific considerations. It may not be appropriate to deliver housing in accordance with the mix set out in Table 4.3, and therefore some flexibility such as this is welcomed.

Optional Standards

- 6.2.7 Policy DEV2(9) and (10) relates to accessible and adaptable housing standards. Part 9 states that for residential development of 10 dwellings or more the Council will seek that 20% of homes should be provided to Building Regulations (M4(2) 'Accessible and Adaptable dwellings'. Part 10 moves on to outline that where there is an identified need the Council will also seek a proportion of wheelchair user dwellings in order to meet an overall requirement for 5% of new homes to be wheelchair accessible in accordance with Building Regulations M4(3) 'Wheelchair User Dwellings'.
- 6.2.8 In this regard Gladman refer to the PPG which provides additional guidance on the use of these optional standards. The Council need to ensure that this policy requirement is in line with the guidance and the justification and specific details of the policy take account of the various factors which the PPG refers to.

“Based on their housing needs assessment and other available datasets it will be for the local planning authorities to set out how they intend to approach demonstrating the need for requirement M4(2) (accessible and adaptable dwellings), and / or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:

- *The likely future need for older and disabled people (including wheelchair user dwellings).*
- *Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes, or care homes).*
- *The accessibility and adaptability of existing stock.*
- *How needs vary across tenures.*
- *The overall impact on viability.” (ID:56-007-20150327)*

- 6.2.9 Whilst Gladman do not raise a specific concern in relation to Building Regulation M4 (2) Gladman query the percentage requirements for the provision of M4 (3). The provision of category 3

(wheelchair user dwellings) is far more onerous in terms of size requirements therefore it is crucial that the implications of this proposed policy requirement have been properly considered.

- 6.2.10 Furthermore, with regards to DEV2(10) which seeks a proportion of wheelchair user dwellings in order to meet an overall requirement of 5% of new homes, Gladman refer to the PPG which states:

“Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.

Local plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.” (emphasis added)

- 6.2.11 This clearly demonstrates that M4 (3) should only be applied to affordable homes. As currently drafted this policy requirement does not reflect this element of national policy. The policy should be amended to reflect this.

- 6.2.12 It is incumbent upon the Council to provide the robust evidence which would justify the inclusion of policy requirements for the optional standards and also the quantum required.

Housing for Older People

- 6.2.13 Policy DEV2 (11 and 12) relates to housing for older people. The provision of specialist housing to meet the needs of older people is of increasing importance and the Council need to ensure that this is reflected through a positive policy approach within the Local Plan. The Council need a robust understanding of the scale of this type of need across the Borough.

- 6.2.14 Part 11 outlines that in residential developments of 10 dwellings or more, 20% provision must be made to accommodate the needs of older people. The policy goes on to state that the nature of this provision will be determined on a site by site basis depending on demand in a particular area. Gladman support the flexibility within this policy for the type of provision to be determined on a site by site basis and also note that further guidance on the types of provision that would meet this policy requirement are provided in the supporting text to the policy. Gladman consider that this element of the policy would benefit from further clarity and detail. This would help the development industry to understand what is expected of them in terms of the delivery of housing for older people.

- 6.2.15 Part 12 relates to Supported and Extra Care housing and outlines how the Council will support these types of schemes in accessible locations where there is an identified need.

- 6.2.16 Specialist housing with care for older people is a type of housing which provides choice to adults with varying care needs and enables them to live as independently as possible in their own self-contained homes, where people are able to access high quality, flexible support and care services on site to suit their individual needs (including dementia care). Such schemes differ from traditional sheltered/retirement accommodation schemes and should provide internally

accessible communal facilities including residents' lounge, library, dining room, guest suite, quiet lounge, IT suite, assisted bathroom, internal buggy store and changing facilities, reception and care managers office and staff facilities.

- 6.2.17 Given the existing evidence in relation to ageing populations, and the national strategy in relation to housing for older people, Gladman are supportive of the inclusion of this element of Policy DEV2.

Self and Custom Build

- 6.2.18 Policy DEV2 includes a vague policy requirement seeking to ensuring sufficient supply of plots for self-build and custom build housing to meet the identified need on the Council's register. This states that applications for self-build and custom housing development will be supported subject to consideration against the other relevant policies in the plan.
- 6.2.19 Gladman question whether this will be sufficient and effective at delivering the supply of self build housing to meet demand.

6.3 Policy DEV4 – Economic Growth and Development

- 6.3.1 The Local Plan should seek to meet employment needs across a wide range of locations in order to address the needs of business. It is vital that local plans contain policies that positively and proactively encourage the scale of development that is required to support the delivery of sustainable economic growth and in doing so contribute towards building a strong, competitive economy both locally and nationally.
- 6.3.2 A clear economic vision and strategy should be put in place. This should reflect local business needs and be responsive to any wider opportunities that will allow the area to build on its strengths, counter any weaknesses and address future challenges. The policies of the Local Plan should match the wider economic strategy for the area and include policies that encourage local and inward investment that is required to meet anticipated needs over the plan period. Furthermore, it is vital that local policies are responsive to changing circumstances and that they are suitably flexible to ensure that sufficient land of the right type is made available in the right places so that the planning system does not act as an impediment to sustainable economic growth.
- 6.3.3 The NPPF sets out that:

“Achieving sustainable development means that the planning system has three overarching objectives, which are independent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved

productivity; and by identifying and coordinating the provision of infrastructure;” (Paragraph 8)

“Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development” (Paragraph 80)

“Planning policies should: seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment;” (Paragraph 81c)

“Planning Policies should: be flexible enough to accommodate needs not anticipated in the plan...” (Paragraph 81.d)

“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitable accessible locations.” (Paragraph 82)

“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable...”

- 6.3.4 National policy indicates that significant weight should be placed on the need to support economic growth and productivity through the planning system and the need for an approach that recognises and seeks to address potential barriers to investment. This should therefore be reflected within the drafting of local policies to ensure that local plans are fully responsive to economic development needs, including those that have not been anticipated within the Plan. It is therefore essential that due consideration is given to overall development needs in the context of economic growth. It will also be important for any policies that relate to the protection of the countryside to provide sufficient flexibility to support proposals for development where it can make a demonstrable contribution towards the sustainable development of the area.
- 6.3.5 Gladman note that through this latest iteration of the Plan the Council appear to have re-considered the
- 6.3.6 previous pro-growth strategies which had the ambition of moving from Warrington New Town to Warrington New City. Gladman are unclear on the rationale behind this change and the movement away /scaling back from the concept of Warrington New City.

7 POLICIES RELATING TO OBJECTIVE W2

7.1 Policy GB1 – Green Belt

7.1.1 Policy GB1 'Green Belt' outlines that the Council will maintain the general extent of the Borough's Green Belt, as defined through the Policies Map, throughout the Plan Period and to at least 2047. Part 3 of Policy GB1 outlines the land that has been removed from the Green Belt and makes reference to Figure 5.1 which shows the amended boundaries.

7.1.2 GB1(4 - 6) relates to the Inset Settlements, listing these settlements, outlining how within these settlements development will be allowed providing they comply with national policy and other relevant local plan policies. The boundaries of the Inset Settlements are shown on the Proposals Map.

7.1.3 Gladman note that the evidence base in relation to the Green Belt remains the Green Belt Assessment, Original Report (October 2016), Additional Site Assessments (July 2017), Green Belt Assessment Addendum (June 2017) and Green Belt Additional Site Assessments (May 2018).

7.1.4 Gladman refer to Section 13 of the NPPF which provides the national policy framework in relation to the protection of Green Belt land. This provides details regarding how Green Belt boundaries should only be altered where exceptional circumstances exist and that this should be done through the preparation or updating of Local Plans⁵.

7.1.5 Paragraph 137 of the NPPF states:

"Before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development..."

7.1.6 Gladman agree that the Council has the evidence to justify the exceptional circumstances required for Green Belt release, in accordance with the NPPF. Consequently, Gladman are supportive of the Council's approach regarding the need to remove land from the Green Belt in order to meet its development needs.

Safeguarded land

7.1.7 Paragraph 139 of the Framework outlines that:

"When defining Green Belt boundaries, plans should:

- **Where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;**

⁵ NPPF(2019) paragraph 136

- **Make clear that safeguarded land is not allocated for development at the present time. Planning permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;**
- **Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period;”**

7.1.8 Gladman note that this iteration of the Local Plan does not specifically identify any areas of safeguarded land. Instead, the supporting text to Policy GB1 outlines that the Council considers there to be sufficient flexibility of supply in its allocations and specifically that the land that has been removed from the Green Belt to facilitate the Garden Suburb will also provide a supply of new homes that will extend beyond the plan period. The Council believe that due to this flexibility in supply, and due to the fact there will be a realistic supply of brownfield land beyond the current plan period that they can demonstrate the Green Belt boundaries will endure well beyond the plan period.

7.1.9 Whilst Gladman recognise that there is potential for sites to come forward or deliver beyond the Plan period, we query whether this is the most appropriate approach to planning for the borough's long-term housing needs. There is a distinction between the purpose of flexibility/contingency in the plan and safeguarded land. The flexibility in the plan is there to provide contingency within the plan period for instances where sites do not come forward as planned and to ensure that the plan is capable of delivering the full scale of need within the plan period. Safeguarded land is intended for beyond the current plan period to ensure that the Green Belt boundaries endure well beyond this period.

7.1.10 Gladman believe that it would be beneficial for the Council to reconsider their approach to safeguarded land. The reasoning for this being that the Council's approach is predicated on the ability of the large strategic sites delivering beyond the plan period, however if any of these fail to materialise or come forward as planned there would be limited opportunities to plan for the borough's long-term development needs, without the potential release of further Green Belt land. Creating new Green Belt boundaries that endure well beyond the Plan period now would ensure that further Green Belt releases do not need to take place through a future Local Plan review.

8 POLICIES RELATING TO OBJECTIVE W5

8.1 Policy DC1 – Warrington’s Place

- 8.1.1 Policy DC1 is a long policy covering a range of issues affecting places across the borough. Part 8 to 10 of this policy relates to the Countryside and Outlying Settlements. Gladman raise some concern regarding the tone of the policy wording within Part 8 of DC1, specifically where it refers to the *“inset settlements of ... **will be protected...**”*
- 8.1.2 This policy wording is somewhat unclear and ambiguous and could be used in an overly restrictive, inconsistent or negative manner. Gladman recommend that the Council revisit this element of Policy DC1 and provide further clarity on what they are seeking to protect or amend the policy wording.

9 POLICIES RELATING TO OBJECTIVE W6

9.1 Policy ENV7 – Renewable and Low Carbon Energy Development

- 9.1.1 Policy ENV7 relates to renewable and low carbon energy development. Part 4 of this policy sets a requirement for all major residential development (11 units or more) in locations outside of the strategic allocations, to meet at least 10% of their energy needs from renewable and/or other low carbon energy sources. Part 6 of the policy relates to the strategic housing and employment allocations. For these allocations this policy requires development to establish or connect to an existing decentralised energy network unless this is shown not to be feasible or viable.
- 9.1.2 Whilst Gladman are supportive of ENV7's intentions, the requirements of this policy could be onerous and unrealistic, particularly on the smaller allocations. However, we recognise that the policy requirement does include a caveat whereby if it is not feasible or viable exploit decentralised energy then developments would need to meet alternative requirements. The Council should ensure that it has sufficient evidence to justify this policy. Gladman recommend that this element of this policy would benefit from revision, to take more enabling/supportive stance to the use of renewable energy, rather than setting prescriptive requirements.

10 SITE ALLOCATIONS

10.1 Policies OS6 and OS8 – Land at Pool Lane and Warrington Road, Lymm

- 10.1.1 As identified previously in these representations, Gladman are supportive of the Council's decision to allocate land to the west of Lymm (location plan shown in Figure 1 below) in accordance with draft policies OS6 and OS8. Gladman submit that both of these sites represent sustainable and logical locations in which to deliver further residential development, and release land from the Warrington Green Belt.



Figure 1. Site Location – Land at Pool Lane and Warrington Road, Lymm

- 10.1.2 Land at Pool Lane and Warrington Road are not subject to any technical, landownership or viability constraints that would preclude their development. Both land parcels are being actively promoted on behalf of the landowners, and can be delivered in the short term to contribute to Warrington's housing needs.
- 10.1.3 The remainder of this section describes both sites' suitability for residential development in further detail, taking account of the technical studies that have been undertaken to support the delivery of the sites to date, and the Council's proposed policy requirements

New Homes

- 10.1.4 The sites could deliver a wider range of market and affordable homes to meet the borough's general and specialist housing needs. In accordance with the Council's emerging policy position,

30% of the homes would be delivered as affordable housing. The sites could be built out to a minimum density of 30 dwelling per hectare (dph), reflecting their edge of settlement location

Community Facilities and Viability

- 10.1.5 Proportionate developer contributions towards the delivery of new community infrastructure, including the provision of new primary and secondary school facilities, and healthcare capacity, would be provided alongside any proposals.
- 10.1.6 Gladman is willing to agree to all requests for developer contributions that meet the relevant requirements of paragraph 56 of the Framework and CIL Regulations 122 and 123.
- 10.1.7 The Council's Viability Report assumes a developer contribution figure of £9,548 per unit for the purposes of its viability testing. Gladman can confirm that this figure is achievable.

Open Space and Recreation

- 10.1.8 Generous areas of informal and formal open space will be provided as part of the sites' development, including the provision of a Locally Equipped Area for Play (LEAP) and Local Area for Play (LAP). The total area of open space provided as part of the sites' development would meet and exceed the Council's requirements.
- 10.1.9 As presently drafted, the requirements for policies OS6 and OS8 envisage that the two allocations will come forward independently in respect of open space requirements. **We suggest that the overall policy could be amended to reflect the possibility that the two sites may come forward as a single proposal.**

Natural Environment

- 10.1.10 The development of site would seek to respect and retain important landscape features wherever possible, including existing trees and hedgerows, and the existing pond situated in proposed allocation OS8.
- 10.1.11 A Landscape and Visual Impact Assessment has been prepared for both sites, and has identified that views of two parcels from the surrounding area are generally limited due to existing landscape features, intervening vegetation and topography.
- 10.1.12 New tree and green infrastructure planting along the sites' boundaries would help to further filter views from the surrounding countryside, respect the character of the adjoining farmland, and ensure a sympathetic and logical extension to the existing settlement edge.
- 10.1.13 An initial ecology survey has been completed for both sites, and has not identified any issues that could not be addressed through a series of tried and tested mitigation techniques. Through the provision of new green infrastructure planting, the creation of attenuation basins and other ecological enhancements, it is considered that the development will result in the delivery of net biodiversity gains.

Green Belt

- 10.1.14 As described in Sections 5.2 and 7 above, in order to meet the borough's housing needs up to 2037, the Council has identified a requirement to review the authority's Green Belt boundaries. to deliver additional homes outside of the Warrington Urban Area and the confines of the authority's town and village boundaries.
- 10.1.15 In order to gain a better understanding of the relationship between the Green Belt and the two sites, Gladman has commissioned consultants Pegasus Group to undertake an independent Green Belt assessment to support its emerging development proposals, as detailed in Appendix 1 to this submission.
- 10.1.16 The results of this assessment clearly demonstrate that Land at Pool Lane and Warrington Road could be successfully developed without affecting the wider, on-going function of the Warrington Green Belt in this location, and support the Council's decision to release the sites for development.

Transport and Accessibility

- 10.1.17 Vehicular access to the two parcels can be achieved via staggered priority junctions from Warrington Road. It has been confirmed that the junctions can be accommodated with the necessary visibility splays, and that there are no third party landownership issues that would prevent access being delivered in this location.
- 10.1.18 The site's benefit from existing footway provision to the north of Warrington Road, providing a direct pedestrian link into the Lymm settlement area, and access to its services and amenities in an acceptable walking and cycling distance (the majority of Lymm's facilities, including its high street, would be situated within 2000m of the sites).

Utilities and Environmental Protection

- 10.1.19 Whilst allocation OS6 and parts of OS8 lie in Flood Zone 2, discussions with the Environment Agency have confirmed that development in these areas would be acceptable subject to the implementation of an appropriate surface water drainage strategy, building to a minimum finished floor level, and incorporating built in resilience measures.
- 10.1.20 Finished floor levels would be set at a minimum of 13.68m AOD (above the 1 in 100 year level, plus a 70% allowance for climate change).
- 10.1.21 Existing areas of surface water flooding would be addressed and managed as part of the sites' development. Surface water run-off would be stored in attenuation basins before being discharged at the 1 in 100 year plus 40% climate change rate, ensuring that the proposals do not increase the risk of flooding on-site or elsewhere.
- 10.1.22 The proposals could be served by new or enhanced gas, electricity, telecommunications and water supply infrastructure. It has been confirmed that there is sufficient capacity in the local sewerage network to accommodate the proposals.

- 10.1.23 The new properties provided as part of the sites' development could be designed to incorporate energy efficiency measures and mitigate the impacts of climate change.
- 10.1.24 Air and noise assessments have confirmed that the sites' development would not give rise to any adverse impacts in respect of noise and air quality, and the proximity to Statham Lodge Hotel would not pose a constraint to development.

Historic Environment

- 10.1.25 A Built Heritage and Archaeological assessment has confirmed that there is no intervisibility between the sites and historic core of Lymm. On this basis it is considered that the sites' development would not affect the significance of the Lymm Conservation Area or the Listed Buildings it contains.
- 10.1.26 Although Statham Lodge Hotel (Grade II Listed) is situated to the west of allocation OS6, views between the site and this heritage asset are heavily filtered by intervening vegetation, such that any development would have a limited impact on its significance.

Development Framework Plan

- 10.1.27 Taking account of the above considerations and the technical work undertaken to date, Gladman have prepared a comprehensive illustrative Development Framework Plan to show how allocations OS6 and OS8 could look once developed (included as Appendix 2 to this submission). This demonstrates how the sites could accommodate a high quality and sustainable residential development, in accordance with the Council's draft policy aspirations.
- 10.1.28 Gladman and the sites' owners would be happy to discuss the above submissions further with the Council's officers, building on discussions that have already taken place, in moving our proposals for the allocations forward.

10.2 General Comments on other Local Plan Allocations

Policy MD2 – Warrington Garden Suburb

- 10.2.1 Gladman note that the proposed Warrington Garden Suburb is identified to deliver a significant proportion of the total housing requirement over the course of the plan period. Whilst Gladman do not object in principle to this large strategic allocation, Gladman do raise concerns regarding the scale of delivery proposed within the timescales identified in the trajectory.
- 10.2.2 Gladman note that Policy MD2 outlines that the Garden Suburb whilst allocated to deliver 7,400 homes in total is expected to deliver around 5,100 of these new homes within the Plan period. Gladman note and support the fact that the proposed delivery within the plan period has reduced since the previous iteration of the plan, however still raise delivery of the proposed scale as a potential concern regarding the delivery of the plan as a whole.
- 10.2.3 The majority of the Garden Suburb does not yet have planning permission; therefore it is reasonable to assume that it will be a number of years before the site will start delivering

substantial number of units. Whilst this is reflected in the trajectory to a certain degree Gladman remain unconvinced regarding the assumed delivery assumptions. SUEs and large strategic sites such as this are often complex schemes and require significant issues to be overcome prior to granting planning approval.

- 10.2.4 The housing trajectory for the Local Plan outlines that delivery was expected to start on the Garden Suburb in 2018/19 and that 45 units should have been delivered that year as part of the phase one development. The trajectory indicates that they are expecting 204 units to be delivered in 2019/20. The delivery across the site increases after these initial years with the peak of delivery being 396 dwellings in 2027/28.
- 10.2.5 Gladman are unclear whether the identified delivery for this current year (204 units) is likely to happen and also question whether the site is capable of achieving the peak delivery rates and sustain the high levels of delivery over a number of years of the plan period.
- 10.2.6 It is important that the Council are realistic regarding their delivery assumptions else this will impact on the delivery of the plan as a whole.

Policy MD3 – South West Urban Extension

- 10.2.7 The proposed South West Urban Extension is identified within Policy MD3 to deliver around 1,600 new homes. Similarly to the Garden Suburb, Gladman do not object in principle to the proposed South West Urban Extension.
- 10.2.8 Gladman note, from the housing trajectory that the first assumed delivery from this SUE is not until 2023/24 and that the annual delivery rates are around 116 units across the remainder of the plan period. These lead in times and annual delivery rates appear more realistic and achievable, however it is still critical that the Council have evidence to justify the delivery assumptions that they are relying upon for this site. Any slippage beyond those rates assumed would take the delivery of this site beyond the plan period and would again impact on the delivery of the overall scale of housing across the plan period.

Policy MD4 – Land at Peel Hall

- 10.2.9 Policy MD4 seeks to allocate land at Peel Hall to deliver a new sustainable community of around 1,200 homes. Gladman question the deliverability of this allocation and its inclusion within the Local Plan following the Secretary of State's decision letter (December 2018).
- 10.2.10 Gladman are unclear what, if anything, has changed since this decision to demonstrate that this site is deliverable. Gladman's concerns regarding this proposed allocation relate to the impact that this site may have on the effectiveness of the plan overall.

11 SITE SUBMISSIONS

11.1 Introduction

11.1.1 As detailed through these representations, Gladman submit that the Council's Local Plan would benefit from further flexibility and contingency to ensure that the authority's spatial strategy is delivered, and sufficient homes are provided to meet the borough's needs. To this end, this sections of our submissions highlights Gladman's other land interests, that could assist with these objectives.

11.2 Land off Abbey Close, Croft

11.2.1 Gladman have been appointed to promote Land at Abbey Close, Croft for residential development through the Council's emerging Local Plan. The site is situated immediately adjacent to the Croft settlement boundary (as shown in Figure 2 below), and is ideally located to deliver further residential development to meet Warrington's housing needs.

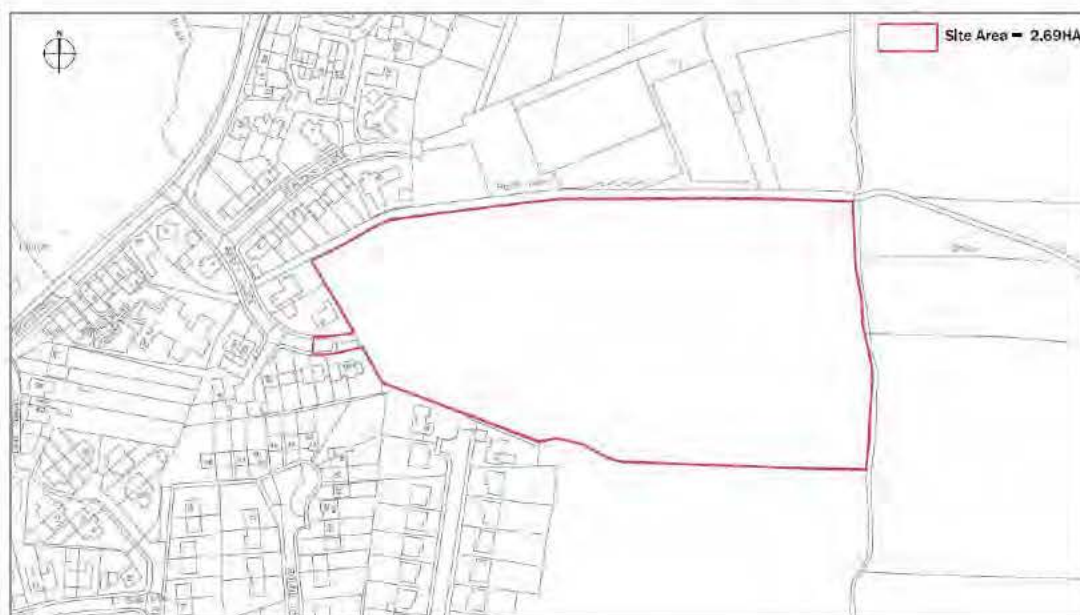


Figure 2. Site Location – Land off Abbey Close, Croft

11.2.2 Land off Abbey Close is not subject to any technical, landownership or viability constraints that would preclude its development. The remainder of this section describes the site's suitability for development, taking account of the technical studies that we have undertaken to date, and describes how this site would represent a logical location to release land from the Green Belt.

New Homes

11.2.3 The site could deliver a wide range of market and affordable homes to meet the borough's general and specialist housing needs. In accordance with the Council's emerging policy position, 30% of the homes would be delivered as affordable housing. The site could accommodate

housing at a minimum density of 30 dwelling per hectare (dph), reflecting its edge of settlement location

Community Facilities and Viability

11.2.4 Proportionate developer contributions towards the delivery of new community infrastructure would be provided as part of any proposals. Gladman is willing to agree to all requests for developer contributions that meet the relevant requirements of paragraph 56 of the Framework and CIL Regulations 122 and 123.

11.2.5 Generous areas of informal and formal open space will be provided as part of the site's development, including the provision of a Locally Equipped Area for Play (LEAP).

Landscape

11.2.6 The development of site would seek to respect and retain important landscape features wherever possible, including existing trees and hedgerows. A Landscape and Visual Impact Assessment has identified that views of the site from the west, north and south are limited by a combination of built development and woodland, whilst views from the adjacent Public Right of Way (PRoW) would be heavily filtered by an existing hedgerow.

11.2.7 The development of the site would be closely related to the existing housing and built form within the settlement, and seen in the context of existing dwellings situated off Abbey Close and Bettysfield Drive. Any development proposals could respect that character of the adjoining farmland, with new native tree planting provided alongside the eastern site boundary, to strengthen this edge to the village.

Ecology

11.2.8 An initial ecology survey has been completed for the land, and has not identified any ecological constraints that could not be adequately accommodated or mitigated as part of any proposals. Trees and hedgerows provide the majority of the site's ecological interest, and would be retained and enhanced wherever possible.

11.2.9 The development of the site would provide opportunities to deliver ecological enhancements through new tree planting, the creation of an attenuation basin, and the potential to provide new areas of open space and planting that are attractive to wildlife. The development of the site would not affect the adjacent Local Wildlife Site.

Green Belt

11.2.10 Land at Abbey Close was assessed as making a 'strong' contribution to the Warrington Green Belt as part of the Council's May 2018 Green Belt Additional Site Assessments (Site R18/155), however Gladman question this conclusion.

11.2.11 In the context of the proposed allocation of the Heathcote Stud site to the north, and existing residential development to the south, it is questionable whether the site would perform an

ongoing Green Belt function. Once this allocation is brought forward for development, this parcel would become very enclosed by built form, and effectively an in-fill site. The development of the allocation to the north would create a strong development line to the east of the settlement, which would ensure that any development on this site would not result in further encroachment into the open countryside.

- 11.2.12 To gain a better understanding of the relationship between the Warrington Green Belt and Land at Abbey Close, Gladman has commissioned consultants Pegasus Group to undertake an independent Green Belt assessment, as detailed in Appendix 3 to this submission. The results of this assessment clearly demonstrate that Land off Abbey Close could be successfully developed without affecting the wider, on-going function of the Warrington Green Belt in this location, and makes a 'weak' contribution to the Green Belt overall.

Transport and Accessibility

- 11.2.13 Vehicular access to the site would be achieved via an extension of the existing highway leading from Abbey Close. The land is in the ownership and control of the landowners, and there are no third party landownership issues that would prevent an access being delivered in this location.
- 11.2.14 The site is situated in close proximity to the existing services and facilities available in Croft, which would be accessible for pedestrians via Abbey Close. The nearest bus stops to the site are situated on Lord Street and Smith Brw, and are served by frequent services to destinations including Culcheth, Birchwood Park and Warrington town centre.

Flooding and Drainage

- 11.2.15 The site is situated entirely in Flood Zone 1, and is therefore at the lowest risk of fluvial flooding. Although parts of the site are currently affected by surface water flooding, this could be addressed via drainage improvement works/site design as part of any proposals.
- 11.2.16 Surface water run-off would be stored in attenuation basins before being discharged at the 1 in 100 year plus 40% climate change rate, ensuring that the proposals do not increase the risk of flooding on-site or elsewhere.

Utilities

- 11.2.17 The proposals could be served by new or enhanced gas, electricity, telecommunications and water supply infrastructure. It has been confirmed that there is sufficient capacity in the local sewerage network to accommodate the proposals.

Air and Noise

- 11.2.18 Air and noise assessments have confirmed that the site's development would not give rise to any adverse impacts in respect of noise and air quality, and that the amenity of future residents would not be affected in either of these respects.

Historic Environment

- 11.2.19 There are no designated heritage assets within the Site or its immediate vicinity. Within the wider area, the Grade II Listed Christ's Church is situated around 330m from the Site's eastern boundary. However, views west from Christ Church towards the proposed development Site already comprise modern residential development along its southern and western boundaries.
- 11.2.20 Any proposals for the Site could incorporate a view corridor towards Christ Church, which will be maintained and framed through strong building lines and appropriate landscaping. This will respect the existing views of the Grade II Listed church from within the Site.

Development Framework Plan

- 11.2.21 Taking account of the above considerations and the technical work undertaken to date, Gladman have prepared an illustrative Development Framework Plan to show how the site could look once developed. This demonstrates how the site could accommodate a high quality and sustainable development. The Development Framework Plan is included as part of Appendix 4 to this submission.
- 11.2.22 Gladman and the site's owners would now welcome further discussions with the Council, as we look to develop our proposals for the site.

11.3 Land to the North and South of Camsley Lane, Lymm

- 11.3.1 In addition to its land interests at Pool Land and Warrington Road, Gladman have been appointed to promote Land at Camsley Lane, Lymm for residential development through the Council's emerging Local Plan (shown in Figure 3 below). The site consists of two separate land parcels that are situated in a sustainable and logical location to deliver further residential development to meet Warrington's housing needs and complement the Council's existing plans for Green Belt release to the west of the settlement.

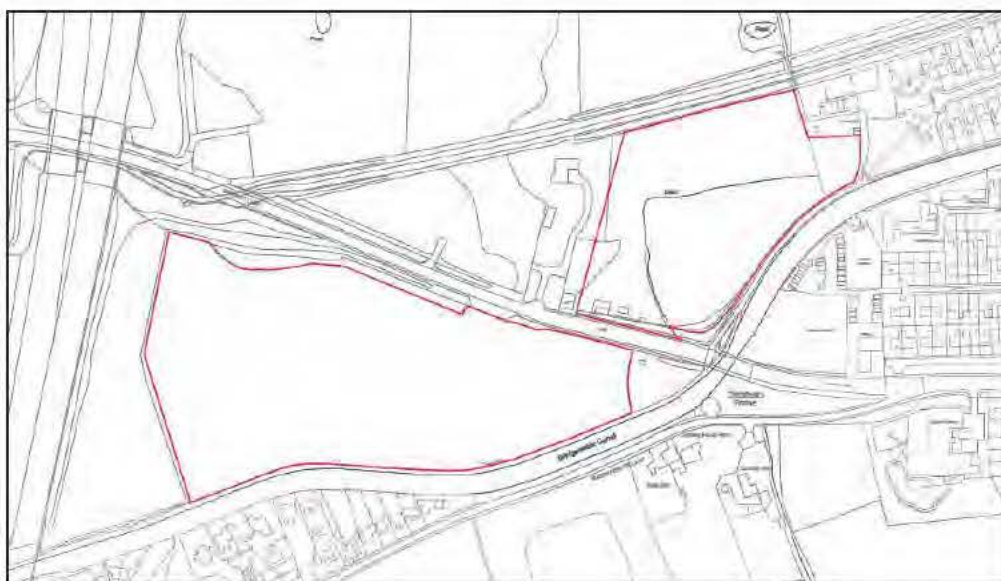


Figure 3. Site Location – Land off Camsley Lane, Lymm

- 11.3.2 The site is separated into two parcels by Camsley Lane. The northern parcel would be provided exclusively as open space/an area of ecological enhancement, with residential development focussed on the southern parcel.
- 11.3.3 Land at Camsley Lane is not subject to any technical, landownership or viability constraints that would preclude its development. The remainder of this section describes the site’s suitability for development, taking account of the technical studies that we have undertaken to date.

New Homes

- 11.3.4 The site could deliver a wide range of market and affordable homes to meet the borough’s general and specialist housing needs. In accordance with the Council’s emerging policy position, 30% of the homes would be delivered as affordable housing.
- 11.3.5 The site could accommodate housing at a minimum density of 30 dwelling per hectare (dph), reflecting its edge of settlement location.

Community Facilities and Viability

- 11.3.6 Proportionate developer contributions towards the delivery of new community infrastructure would be provided as part of any proposals. Gladman is willing to agree to all requests for developer contributions that meet the relevant requirements of paragraph 56 of the Framework and CIL Regulations ‘ 22 and 123.
- 11.3.7 Generous areas of informal and formal open space will be provided as part of the site’s development, including the provision of a Locally Equipped Area for Play (LEAP).

Landscape

- 11.3.8 The development of site would seek to respect and retain important landscape features wherever possible, including existing trees and hedgerows. A Landscape and Visual Impact Assessment has been prepared for the site, and identifies that views of the southern parcel are generally limited due to existing landscape features, intervening vegetation and topography, and the M6 motorway embankment.
- 11.3.9 New tree and green infrastructure planting along the site’s boundaries would help to further filter views from the surrounding countryside, respect the character of the adjoining farmland, and ensure a sympathetic and logical extension to the existing settlement edge.

Ecology

- 11.3.10 An initial ecology survey has been completed for the land to the south of Camsley Lane, and has not identified any ecological constraints to its development. The land to the north of Camsley Lane contains a mixture of habitats, as it consists of unmanaged land at the present time.

- 11.3.11 Alongside the retention and enhancement of the existing mosaic of habitats provided in the land parcel to the north of Camsley Lane, it is considered that the development will result in the delivery of net biodiversity gains through the provision of new green infrastructure planting, the creation of attenuation basins and other ecological enhancements.

Green Belt

- 11.3.12 As described in Sections 5.2 and 7 above, in order to meet the borough's housing needs up to 2037, the Council has identified a requirement to review the authority's Green Belt boundaries, to deliver additional homes outside of the Warrington Urban Area and the confines of the authority's town and village boundaries.
- 11.3.13 Land to the south of Camsley Lane was assessed as making a 'weak' contribution to the Warrington Green Belt as part of the Council's 2016 Green Belt study (Site LY28), which notes that the site is *'connected to countryside on all sides along durable boundaries which would be able to prevent further encroachment beyond the parcel if the parcel were developed'*.
- 11.3.14 To gain a better understanding of the relationship between the Warrington Green Belt and the land to the north and south of Camsley Lane, Gladman has commissioned consultants Pegasus Group to undertake an independent Green Belt assessment, as detailed in Appendix 5 to this submission. The results of this assessment clearly demonstrate that Land to the south of Camsley Lane could be successfully developed without affecting the wider, on-going function of the Warrington Green Belt in this location. The Pegasus report concludes that the site makes a weak contribution to the strategic function of the Green Belt overall.

Transport and Accessibility

- 11.3.15 Vehicular access to the land to the south of Camsley Lane can be achieved via a new priority junction from the A56. It has been confirmed that the junction can be accommodated with the necessary visibility splays, and that there are no third party landownership issues that would prevent an access being delivered in this location.
- 11.3.16 The site benefits from existing footway provision to the north of Warrington Road, providing a direct pedestrian link into the Lymm settlement area, and access to its services and amenities in an acceptable walking and cycling distance (the majority of Lymm's facilities, including its high street, would be situated within 2000m of the site).

Flooding and Drainage

- 11.3.17 The land to the south of Camsley Lane is situated entirely in Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. Existing areas of surface water flooding would be addressed and managed as part of the site's development.
- 11.3.18 Surface water run-off would be stored in attenuation basins before being discharged at the 1 in 100 year plus 40% climate change rate, ensuring that the proposals do not increase the risk of flooding on-site or elsewhere.

Utilities

- 11.3.19 The proposals could be served by new or enhanced gas, electricity, telecommunications and water supply infrastructure. It has been confirmed that there is sufficient capacity in the local sewerage network to accommodate the proposals.

Air and Noise

- 11.3.20 Air and noise assessments have confirmed that the site's development would not give rise to any adverse impacts in respect of noise and air quality.
- 11.3.21 Whilst land to the south of Camsley Lane lies in close proximity to the M6 motorway, any effects of road traffic noise could be addressed through the orientation and layout of dwellings. Appropriate measures would be put in place to respond to the site's proximity to the M6 motorway Air Quality Management Area (AQMA 1).

Historic Environment

- 11.3.22 A Built Heritage and Archaeological assessment has confirmed that there is no intervisibility between the site and the historic core of Lymm. On this basis it is considered that the site's development would not affect the significance of the Lymm Conservation Area or the Listed Buildings it contains.

Development Framework Plan

- 11.3.23 Taking account of the above considerations and the technical work undertaken to date, Gladman have prepared an illustrative Development Framework Plan to show how the sites could look once developed/managed as an area of wildlife enhancement (included as Appendix 6 to this submission). This demonstrates how the site could accommodate a high quality and sustainable development.
- 11.3.24 Gladman and the sites' owners would be happy to discuss the above submissions further with the Council's officers, as we look to develop our proposals for the site.

12 MONITORING AND REVIEW

12.1 Policy M1 – Local Plan Monitoring and Review

- 12.1.1 Policy M1 provides monitoring framework for the Local Plan. Gladman consider it is important that the Council monitor the delivery of the Main Development Allocations to ensure that the plan as a whole is capable of being delivered.
- 12.1.2 Part 3 of Policy M1 outlines that if delivery of housing is less than 75% of annual requirements for three consecutive monitoring years, that this will trigger the need for the consideration of a review or partial review of the Local Plan. Gladman believe that this policy requirement needs revising to ensure that it is effective.
- 12.1.3 Gladman consider that the wording of any review mechanism needs to be clear, easily understandable, effective and enforceable. The issue was discussed at length at the North West Leicestershire Local Plan Examination with the Inspector there keen to ensure that any review policy was meaningful and had teeth.
- 12.1.4 Policy S1 of the North West Leicestershire Local Plan (adopted November 2017) is provided below as an example of an effective and implementable review policy. This states:

“The District Council will commence a review of this Local Plan (defined as being publication of an invitation to make representations in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) by the end of January 2018 or within 3 months of adoption of this Local Plan (whichever is the later). The Plan review will be submitted for examination within 2 years from the commencement of the review. In the event that the reviewed plan is not submitted within two years then this plan will be deemed out of date.”

12.2 Housing Trajectory

- 12.2.1 Gladman note the housing trajectory and stepped housing supply as set out in Appendix 1 to the Local Plan Proposed Submission Version. The step up in delivery from 588 in 19/20 to 1,416 in 20/21 is a significant jump. The Council should ensure that they have the evidence to demonstrate that this scale of increased delivery is realistic and achievable.
- 12.2.2 In order to be found sound through the examination process the Council need to be able to demonstrate that the Local Plan is effective. Paragraph 35 of the NPPF outlines the four tests of soundness, with Effective being *“deliverable over the plan period...”*

13 CONCLUSIONS

13.1 Key Conclusions

- 13.1.1 Gladman are supportive of the Council in preparing the Local Plan and welcome the opportunity to comment on the Proposed Submission Version.
- 13.1.2 Gladman are supportive of the need to amend the Green Belt boundaries in order to accommodate the necessary scale of development. This approach is in line with the national policy and provides a positive approach to growth in Warrington.
- 13.1.3 Specifically, Gladman are supportive of allocations OS6 and OS8 in Lymm. Gladman submit that both of these sites represent sustainable and logical locations in which to deliver further residential development, and release land from the Warrington Green Belt.
- 13.1.4 Land at Pool Lane and Warrington Road are not subject to any technical, landownership or viability constraints that would preclude their development. Both land parcels are being actively promoted on behalf of the landowners, and can be delivered in the short term to contribute to Warrington's housing needs.
- 13.1.5 Having considered the Warrington Local Plan, Gladman have raised a few queries regarding the overall approach and spatial strategy. Gladman recommend further flexibility is required within the Local Plan, through additional small/medium sites, to help ensure that the plan is deliverable over the plan period. Gladman also believe that the Plan would benefit from the addition of safeguarded land.
- 13.1.6 In addition to the proposed allocations at OS6 and OS8 Gladman are promoting further land to the west of Lymm and a parcel of land in Croft. Site submissions regarding both of these sites have been included as part of this submission, and could provide greater flexibility in the Council's land supply. These submissions make reference to individual Green Belt reports regarding the sites prepared on Gladman's behalf by Pegasus.
- 13.1.7 Gladman request to be kept informed of progress with the Local Plan and request to participate in the EiP in due course.

APPENDIX 1

**Green Belt Assessment, Land at Pool Lane and Warrington Road, Lymm,
prepared by Pegasus (June 2019)**



WARRINGTON PROPOSED SUBMISSION VERSION LOCAL PLAN 2017-2031 CONSULTATION

GREEN BELT ASSESSMENT

LAND AT POOL LANE AND WARRINGTON ROAD – LYMM

GLADMAN DEVELOPMENTS LTD

Date: June 2019

Pegasus Reference: KL/P19-1259/R001v4

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1. INTRODUCTION

1.1 This Green Belt Assessment has been prepared on behalf of Gladman Developments Ltd (Gladman) in respect of their land interests at Lymm Pool/Warrington Road. Gladman are in control of 13.88 hectares, made up of four parcels (A-D) to the west of Lymm (see Appendix 1). This Green Belt Assessment relates specifically to Parcels A and B. Parcel A is known as land at Pool Lane and Parcel B is known as land at Warrington Road.

1.2 This assessment sets out the relevant national and local planning policy before going on to assess the contribution that the sites make, and impact that the development of these parcels would have on the five purposes of Green Belt.

National Planning Policy Green Belt Considerations

1.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The document was initially published in March 2012 and since revised in July 2018 and February 2019. The Submission Version of the Warrington Local Plan (2017-2037) was published for public consultation in April 2019. As such the Local Plan will be considered by the Inspector under NPPF (2019).

1.4 Chapter 13; Protecting Green Belt land of the NPPF sets out the importance of the Green Belt. Paragraph 133 advises that the essential characteristics of Green Belt are their openness and their permanence. Paragraph 134 confirms that the five purposes of the Green Belt are:

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

1.5 Paragraph 136 of the NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances which have been fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.

Green Belt Around Warrington & Local Planning Policy

1.6 The Green Belt around Warrington was first formally designated in the Cheshire Structure Plan 1977 (adopted 1979) with the Green Belt boundary drawn around the existing settlements and the areas outside of the New Town Designation. Later alterations of the Structure Plan in 1985 and

1999 did not change the extent of the Green Belt boundary. Whilst minor amendments to the Green Belt boundary were made through the 1998 Unitary Development Plan, the Local Plan Core Strategy (2014) did not alter the Green Belt boundaries and therefore the current Green Belt boundaries are still based upon the original designation some 40 years ago.

- 1.7 The development plan comprises of the adopted Warrington Local Plan Core Strategy (July 2014). Following its adoption, a legal challenge was made with respect to the housing policies contained within the Warrington Local Plan Core Strategy with the Plan's housing target and reference to the delivery of new homes at the Omega strategic development site being overturned.
- 1.8 Warrington Borough Council (WBC) are in the process of preparing their Local Plan. The Submission Version of the emerging Local Plan was published in April 2019. The Plan is expected to be submitted to the Secretary of State in October 2019 with an estimated date of adoption in December 2020. The emerging Local Plan is supported by a Green Belt assessment prepared in October 2016 (by Arup) to assist WBC in considering whether 'exceptional circumstances' exist to justify altering Green Belt boundaries through the Local Plan.
- 1.9 The Proposed Submission Version of the Local Plan confirms that the primary exceptional circumstance relating to the need for Green Belt release is to ensure that there is sufficient land to meet the borough's development needs over the plan period and beyond. It is clear within the available evidence that there is insufficient land within Warrington's existing urban area and greenfield sites to meet its housing and employment needs going forward. As stated in the Submission Version of the Local Plan, the existing urban area can accommodate around 13,700 new homes. This means there is still the requirement to provide land for around 7,000 homes through the release of Green Belt land.
- 1.10 **Draft Policy DEV1 (Housing Delivery)** outlines a minimum housing requirement of 18,900 new dwellings over the 2017 to 2037 plan period which equates to an annualised requirement of 945 dwellings per annum. Land at Pool Lane and Warrington Road is proposed to be released from the Green Belt and allocated for residential development as part of this Submission Draft of the Local Plan under **Policy OS6 – Lymm** (Pool Lane) and **Policy OS8 – Lymm** (Warrington Road). Policy OS6 has been allocated for a minimum of 40 homes and Policy OS8 has been allocated for a minimum of 130 homes. (see Appendix 2 for a red line boundary of the allocation OS6 Lymm (Pool Lane) and OS8 (Lymm) Warrington Road).

2. GREEN BELT APPRAISAL

- 2.1 This section assesses the contribution of that the land at Pool Lane and Warrington Road (Parcels A and B) makes towards the five Green Belt purposes and the impact that residential development would have on the Green Belt purposes.
- 2.2 The contribution that the parcels make to the Green Belt purposes has been assessed in accordance with the methodology set out in the Warrington Stage 1 Green Belt Assessment (October 2016) produced by Arup. This includes relying upon the same scoring system with parcels contribution scoring as ¹:

Green Belt Contribution	Colour Code
No Contribution	
Weak Contribution	
Moderate Contribution	
Strong Contribution	

- 2.3 In terms of the impact, the Council’s evidence has not specifically assessed the impact that the release of smaller parcels from the Green Belt will have on the strategic function of the Green Belt. As such, this appraisal assesses the potential impact of a residential development on the Green Belt purposes and any possible mitigation measures to reduce any impact on the Green Belt. In order to assess the impact, we used the following scoring system;

Impact on Green Belt	Colour Code
Low Impact	
Medium Impact	
High Impact	

- 2.4 A ‘high impact’ is considered to have the most effect on the strategic function of the Green Belt and the development of the parcel would be to the detriment of the Green Belt purposes. A ‘low impact’ demonstrates that the development of the parcel would have a limited/no impact on the Green Belt purpose. In this respect, clearly sites which would have a low or medium impact on the strategic function of the Green Belt would be the most appropriate to accommodate future development within the borough.
- 2.5 This Assessment is set out in Table 1.

¹ The colour coding has been altered in comparison to the Council’s assessment. Pegasus Group have used the same colour coding system to reflect impact. Red refers to a strong contribution/high impact and green refers to weak contribution/low impact. This is to make sure there is no confusion and to ensure that this assessment is easy to read and understand.

Table 1 –Contribution to & Impact on Green Belt - Land at Pool Lane/Warrington Road

		Contribution to Green Belt		Impact upon Green Belt
Purpose 1 - To check the unrestricted sprawl of large built up area	No Contribution	The site is detached from the main urban area (Warrington) and therefore makes no contribution to this purpose.	Low Impact	The site is well related to the settlement of Lymm however it is detached from the main urban area of Warrington and therefore the development would have no impact on the urban sprawl of the large built up area.
Purpose 2 – To prevent neighbouring towns merging into one another	Weak Contribution	The site does not form an essential gap between the settlement of Lymm and the urban area of Warrington (Thelwall). Whilst the site may marginally reduce the actual gap between Warrington and Lymm, it would not reduce the perceived gap between the settlements and would not result in them merging. In addition, whilst separated from the village, Statham Lodge (to the west of parcel A) sits closer to the main urban area of Warrington which effectively is the point where separation is perceived from. The M6 and land to the west of the site will ensure that separation (both perceived and physical) would be retained.	Low Impact	In terms of Purpose 2, the development of site will have a low impact on this purpose. The development of the parcel would not reduce the perception of the existing gap between Lymm, the urban area of Warrington or any neighbouring settlement.
Purpose 3 – To assist in safeguarding the countryside from encroachment	Moderate Contribution	Although there is no built form within the site, the existing urban area of Lymm is adjacent to the eastern boundary of Parcels A and B and the southern boundary of Parcel B. As well as this, there are two large dwellings adjacent to the western boundary of Parcel A. This adjacent built form has a significant impact on the setting of this parcel and as such, this parcel is considered to be more characteristic of the urban area as opposed to the open countryside. Along the parcel boundaries, there are dense hedgerows and trees which prevent long line views into the open countryside and reduce openness. Parcel B also benefits significant vegetation along the western and southern boundaries, with the southern boundary formed by the Transpennine Trail (formerly the Warrington and Stockport Railway) forming a durable boundary. There are no public footpaths in Parcel A however there is a public footpath located through Parcel B running north to south. Despite there being the opportunity to access the open countryside with this parcel, we consider overall the parcels to have a moderate contribution to this purpose.	Medium Impact	The development of this site would result in encroachment to the open countryside owing to the lack of built development however the effect of this would be limited, acknowledging the urbanising effects of the dwellings and hotel to the west of Parcel A between the existing urban area and the wider open countryside. Parcel B also has strong durable boundaries to the north and south, with the latter forming the Transpennine Trail (former Warrington & Stockport Railway), along with a strong vegetation buffer on its western boundary, which could be further strengthened through additional planting as illustrated in the Development Framework Plan (Appendix 3). Although there is access to the open countryside within Parcel B through an existing Public Right of Way (PRoW), there is the opportunity as part of the development of these parcels to further enhance this access to the countryside and provide additional opportunities for access and recreation. There is no access to the open countryside within Parcel A although a PRoW runs on the northern boundary providing the opportunity to improve access to the open countryside by delivering a potential pedestrian link through the site. Given this, the development of the site is considered to have a medium impact on this Green Belt purpose noting the moderate contribution that the site makes to this purpose. However, any development has the potential to create new and enhanced durable boundaries that would prevent further encroachment into the Green Belt and wider countryside.

		Contribution to Green Belt		Impact upon Green Belt
Purpose 4 – To preserve the setting and special character of historic towns	No Contribution	This parcel makes no contribution to this purpose. Although Lymm is considered as an historic town within the Green Belt Assessment, the site is not well related to the historic core with the site located approximately 640m from Lymm Conservation Area, and therefore well beyond the 250m buffer area referred to in the Green Belt Assessment. In addition, the site does not cross an important viewpoint of the Parish Church. As such, this site makes no contribution towards this purpose.	Low Impact	Although Lymm is designated as a historic town, the site is not well related to the historic core of the Conservation Area and does not cross viewpoints from designated heritage assets. Therefore, the site would have a low impact upon this purpose.
Purpose 5 – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate Contribution	Although these parcels are considered to make a moderate contribution to this purpose, this is the same for all Green Belt sites noting the need for Green Belt release to accommodate the borough's future development requirements.	Low Impact	As all Green Belt parcels around Lymm and the wider borough are considered to have the same contribution to this purpose and owing to the lack of land within the existing urban area to meet the borough's development needs, the development of this site will have a low impact on this purpose.
Overall Contribution Impact on Strategic Function of the GB	Weak Contribution	This site is considered to make no contribution to two of the Green Belt purposes, a weak contribution to one Green Belt purpose and a moderate contribution to the two remaining Green Belt purposes. As such the site makes a weak overall contribution to the strategic function of the Green Belt.	Low Impact	The development of the site would have a low impact on the strategic function of the Green Belt, the impact of which could be limited through the proposed planting along the less durable western boundary of the site (Parcel B) and the opportunity to protect and enhance access to the open countryside.

3. CONCLUSIONS

- 3.1 As described in the assessment, this site makes a **weak contribution** to the strategic function of Green Belt. The site is detached from the main urban area of Warrington and does not contribute towards preventing the sprawl of the large built up area of Warrington. In terms of preventing the coalescence of settlements, similarly the site makes limited contribution to this purpose and would not result in the merger of Lymm with Warrington or any other settlements, having no impact on the perception of separation between the two areas.
- 3.2 Although there is no existing built form within the parcels, the parcels are located immediately adjacent to the existing settlement edge of Lymm and are well related to this urban area. This urban backdrop has a significant impact on the countryside setting of these parcels. The parcels are predominantly bound by strong definable/defensible boundaries. There are limited long line views into the open countryside given the dense vegetation and hedgerows which are located on the site's boundaries.
- 3.3 As shown in the development framework plan at Appendix 3, long term defensible Green Belt boundaries can be established in the event that the site is developed. Although the existing western and southern boundaries of Parcel B are considered to be definable and defensible, these boundaries could be strengthened to create a stronger and more durable boundary to prevent future encroachment into the open countryside and urban sprawl. The development framework plan (Appendix 3) depicts the additional landscaping measures which would be implemented along these boundaries which would bolster, strengthen and enhance these boundaries and establish long term Green Belt boundaries. They would also provide new woodland and recreational routes to enhance biodiversity and access to the open countryside.
- 3.4 Noting this, it is considered that the development of this site for residential uses would have a **low impact** on the strategic function of the Green Belt and therefore represents an appropriate site to accommodate housing development to help meet the Borough's and Lymm's development needs.

APPENDIX 2

Land at Pool Lane and Warrington Road, Lymm - Development Framework Plan



APPENDIX 3

Green Belt Assessment, Land to the East of Abbey Close, Croft, prepared by Pegasus (June 2019)



WARRINGTON PROPOSED SUBMISSION VERSION LOCAL PLAN 2017-2031 CONSULTATION

GREEN BELT ASSESSMENT

LAND TO THE EAST OF ABBEY CLOSE, CROFT

GLADMAN DEVELOPMENTS LTD

Date: June 2019

Pegasus Reference: KL/P19-1259/R003v3

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1. INTRODUCTION

- 1.1 This Green Belt Assessment has been prepared on behalf of Gladman Developments Ltd (Gladman) in respect of their land interests in Croft. Gladman are in control of one field parcel to the east of Abbey Close which measures approximately 2.69 hectares (see Appendix 1).
- 1.2 This assessment sets out the relevant national and local planning policy before going on to assess the contribution that the site makes, and impact that the development of the parcel would have on the five purposes of Green Belt.

National Planning Policy Green Belt Considerations

- 1.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The document was initially published in March 2012 and since revised in July 2018 and February 2019. The Submission Version of the Warrington Local Plan (2017-2037) was published for public consultation in April 2019. As such the Local Plan will be considered by the Inspector under NPPF (2019).
- 1.4 Chapter 13; Protecting Green Belt land of the NPPF sets out the importance of the Green Belt. Paragraph 133 advises that the essential characteristics of Green Belt are their openness and their permanence. Paragraph 134 confirms that the five purposes of the Green Belt are:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.5 Paragraph 136 of the NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances which have been fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.

Green Belt Around Warrington & Local Planning Policy

- 1.6 The Green Belt around Warrington was first formally designated in the Cheshire Structure Plan 1977 (adopted 1979) with the Green Belt boundary drawn around the existing settlements and the areas outside of the New Town Designation. Later alterations of the Structure Plan in 1985 and 1999 did not change the extent of the Green Belt boundary. Whilst minor amendments to the Green Belt boundary were made through the 1998 Unitary Development Plan, the Local Plan Core Strategy

(2014) did not alter the Green Belt boundaries and therefore the current Green Belt boundaries are still based upon the original designation some 40 years ago.

- 1.7 The development plan comprises of the adopted Warrington Local Plan Core Strategy (July 2014). Following its adoption, a legal challenge was made with respect to the housing policies contained within the Warrington Local Plan Core Strategy with the Plan's housing target and reference to the delivery of new homes at the Omega strategic development site being overturned.
- 1.8 Warrington Borough Council (WBC) are in the process of preparing their Local Plan. The Submission Version of the emerging Local Plan was published in April 2019. The Plan is expected to be submitted to the Secretary of State in October 2019 with an estimated date of adoption in December 2020. The emerging Local Plan is supported by a Green Belt assessment prepared in October 2016 (by Arup) to assist WBC in considering whether 'exceptional circumstances' exist to justify altering Green Belt boundaries through the Local Plan.
- 1.9 The Proposed Submission Version of the Local Plan confirms that the primary exceptional circumstance relating to the need for Green Belt release is to ensure that there is sufficient land to meet the borough's development needs over the plan period and beyond. It is clear within the available evidence that there is insufficient land within Warrington's existing urban area and greenfield sites to meet its housing and employment needs going forward. As stated in the Submission Version of the Local Plan, the existing urban area can accommodate around 13,700 new homes. This means there is still the requirement to provide land for around 7,000 homes through the release of Green Belt land.
- 1.10 **Draft Policy DEV1 (Housing Delivery)** outlines a minimum housing requirement of 18,900 new dwellings over the 2017 to 2037 plan period which equates to an annualised requirement of 945 dwellings per annum. In Croft, draft **Policy OS2** – Croft proposes to deliver a minimum of 75 homes. As shown in the red line plan at Appendix 2, this land is located immediately north of this site at Abbey Close.

2. GREEN BELT APPRAISAL

2.1 This section assesses the contribution of that the land at Abbey Close makes towards the five Green Belt purposes and the impact that residential development would have on the Green Belt purposes.

2.2 The contribution that the parcel makes to the Green Belt purposes has been assessed in accordance with the methodology set out in the Warrington Stage 1 Green Belt Assessment (October 2016) produced by Arup. This includes relying upon the same scoring system with parcels contribution scoring as ¹:

Green Belt Contribution	Colour Code
No Contribution	
Weak Contribution	
Moderate Contribution	
Strong Contribution	

2.3 In terms of the impact, the Council’s evidence has not specifically assessed the impact that the release of smaller parcels from the Green Belt will have on the strategic function of the Green Belt. As such, this appraisal assesses the potential impact of a residential development on the Green Belt purposes and any possible mitigation measures to reduce any impact on the Green Belt. In order to assess the impact, we used the following scoring system;

Impact on Green Belt	Colour Code
Low Impact	
Medium Impact	
High Impact	

2.4 A ‘high impact’ is considered to have the most effect on the strategic function of the Green Belt and the development of the parcel would be to the detriment of the Green Belt purposes. A ‘low impact’ demonstrates that the development of the parcel would have a limited/no impact on the Green Belt purpose. In this respect, clearly sites which would have a low or medium impact on the strategic function of the Green Belt would be the most appropriate to accommodate future development within the borough.

2.5 This Assessment is set out in Table 1.



¹ The colour coding has been altered in comparison to the Council’s assessment. Pegasus Group have used the same colour coding system to reflect impact. Red refers to a strong contribution/high impact and green refers to weak contribution/low impact. This is to make sure there is no confusion and to ensure that this assessment is easy to read and understand.

Table 1 – Contribution to & Impact on Green Belt -land at Pool Lane/Warrington Road -Land at east of Abbey Close, Croft

		Contribution to Green Belt		Impact upon Green Belt
Purpose 1 - To check the unrestricted sprawl of large built up area	No Contribution	This site is detached from the main urban area (Warrington) and therefore it makes no contribution to this purpose.	Low Impact	The site is detached from the main urban area of Warrington although well related to the settlement of Croft. As such, the development would have no impact on the urban sprawl of the large built up area whilst the M6, the M62 and the surrounding countryside will further restrict any sprawl from the main urban area of Warrington. As such, the development of this parcel would have a low impact on this purpose.
Purpose 2 – To prevent neighbouring towns merging into one another	No Contribution	<p>This site makes no contribution to this purpose. Whilst the site sits between the settlements of Warrington and Culcheth, with Lowton further north, the existing settlement boundaries of Croft are located closer to these settlements than the site and as such the site does not affect the actual or perceived separation of the settlements.</p> <p>Culcheth is around 1.78km to the north east of the site whilst the existing settlement boundary of Croft along Mustard Lane is around 1.69km from Culcheth. Birchwood (Warrington) is around 1.3km from the site whilst the existing settlement boundary along New Lane is around 890m from Birchwood. Lowton is located 3.12km from the site compared to the closest part of the settlement boundary (along Health Lane) which is 2.75m from Lowton.</p>	Low Impact	The parcel is considered to have a low impact on this purpose. The closest towns are Culcheth to the north east and Birchwood to the south east. There is already existing development in between the site and these settlements and therefore the development of this parcel would have a low impact on the wider strategic function of the Green Belt in this respect.

		Contribution to Green Belt		Impact upon Green Belt
Purpose 3 – To assist in safeguarding the countryside from encroachment	Moderate Contribution	<p>The site is bounded to the south (part), west and north (part) by the existing settlement boundaries, with these boundaries being made up of the gardens of residential properties which are classed as non-durable boundaries within the appraisal definitions. Nevertheless, the northern boundary is made up a durable boundary feature in the form of a hedge lined made footpath with Heathcroft Stud beyond. The eastern boundary is a hedgerow which marks the edge of the field boundary. The site is therefore very well contained and whilst there are some longer open views towards the east these are limited by the strong northern and southern boundaries. There is currently no access within the parcel.</p> <p>There is a PRoW which runs along the northern boundary of the site but there are no opportunities to access the countryside within this site. The site is well related to the existing settlement of Croft and this urban area is visible from this site which has an impact on the character of the site.</p>	Medium Impact	The development of this parcel would have a medium impact on the overall strategic function of the Green Belt. Whilst the parcel has some non-durable boundaries and is free from built development, it is well enclosed, with the opportunity to strengthen the enclosure on the eastern boundary, thereby limiting the impact that any development would have on the wider countryside. The land to the north of the site is a draft allocation in the emerging Local Plan. Once this allocation is brought forward for development, this parcel would become very enclosed by built form, and effectively an in-fill site. The role that the site plays against this function would be further reduced.
Purpose 4 – To preserve the setting and special character of historic towns	No Contribution	This site makes no contribution to this purpose as Croft is not identified as an historic town and is not located close to any such town nor does it cross an important viewpoint of the Parish Church.	Low Impact	As Croft is not a historic town and the site is located away from any such town, including any viewpoints of the Parish Church of St Elphins there would be no impact on this purpose.
Purpose 5 – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate Contribution	Although this parcel is considered to make a moderate contribution to this purpose, this is the same for all Green Belt sites noting the need for Green Belt release to accommodate the borough's future development requirements.	Low Impact	As all Green Belt parcels around Croft and the wider Borough are considered to have the same contribution to this purpose and owing to the lack of land within the existing urban area to meet the borough's development needs, the development of this site will have a low impact on this purpose.
Overall Contribution Impact on Strategic Function of the GB	Weak Contribution	This site is considered to make no contribution to three of the Green Belt purposes and a moderate contribution to the two remaining Green Belt purposes. As such the site makes a weak overall contribution to the strategic function of the Green Belt.	Low Impact	The development of the site would have a low impact on the strategic function of the Green Belt, the impact of which would could be further limited through planting along the less durable eastern boundary of the site. As noted above, the impact would be reduced given that draft allocation OS6 is located immediately north of this site.

3. CONCLUSIONS

- 3.1 As described in the assessment, this site makes a **weak contribution** to the strategic function of the Green Belt. The site is detached from the main urban area of Warrington and therefore would make no contribution to Purpose 1. The parcel is considered to be well enclosed and bound predominantly by strong definable boundaries. The development of this parcel would not reduce the existing gap between the neighbouring settlements of Culcheth or Warrington (Birchwood). Furthermore, there is existing development which extends further north, east and south of this site and therefore this parcel makes no contribution to Purpose 2. The dense wooded area adjacent to the southern boundary and the dense hedgerows/ trees along the site boundaries restrict open long line views into the open countryside. They also prevent encroachment into the wider open countryside beyond this parcel and could be strengthened through the development of the site. Although there is no built form within the parcel, the parcel is considered to be well related to the existing settlement of Croft.
- 3.2 In terms of the impact that the development of the site would have on the wider strategic function of the Green Belt, we consider that residential development would have a **low impact** and the site to be a suitable and appropriate option for development. A concept masterplan has been prepared for the site (Appendix 3) which shows how the site could be brought forward for residential development, incorporating additional landscaping and hedgerows along the eastern boundary of the site to create a dense landscaped edge to the development and a strong durable boundary which would prevent future encroachment into the open countryside. This landscaped edge would reflect the adjacent countryside and bolster the existing trees and hedgerows.
- 3.3 This site is located immediately to the south of a draft allocation for residential development (Policy OS2 of the Submission draft of the emerging plan). This draft allocation to the north further encloses the site and would further diminish any contribution that the site may make to the five Green Belt purposes. As such, the development of the allocation to the north and this site would create a strong development line to the east of the settlement which would ensure that any development on this site would result in further encroachment into the open countryside.
- 3.4 In conclusion, the site is considered to make a suitable and logical extension to the settlement of Croft to accommodate future housing for the borough. The site makes a weak contribution to Green Belt purposes and its development would have a low impact on the wider strategic function of the Green Belt.

APPENDIX 4

Land East of Abbey Close, Croft – Development Framework Plan



- Site Boundary: 2.69ha
- Potential residential land: 1.71ha (approx. 60 dwellings @ 35dph)
- Potential vehicular access point
- Potential secondary/emergency access point
- Potential pedestrian/cycle link
- Potential spine route through development
- Potential secondary street
- Shared surface with pedestrian priority
- Existing public footpath
- Potential recreational route
- Public open space to serve the new development
- New woodland planting and hedgerow along eastern boundary
- Existing vegetation
- Potential Locally Equipped Area for Play (LEAP)
- Potential Sustainable Drainage (SuDS) features
- View corridor to Christ Church (Grade II Listed)
- Potential pump station

B	11.07.18	JC	Amended to client's comments
A	24.01.18	AS	Amended to client's comments
Rev	Date	By	Description

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Project	Land to the east of Abbey Close, Croft
Title	Concept Masterplan
Client	Gladman Developments Ltd
Scale	1:1250 @ A3
Date	January 2018
Drawing No.	CS/A/3553/102
Drawn	AS
Checked	SG
Rev	B

APPENDIX 5

Green Belt Assessment, Land at Camsley Lane, Lymm, prepared by Pegasus (June 2019)



WARRINGTON PROPOSED SUBMISSION VERSION LOCAL PLAN 2017-2031 CONSULTATION

GREEN BELT ASSESSMENT

LAND AT CAMSLEY LANE, LYMM

GLADMAN DEVELOPMENTS LTD

Date: June 2019

Pegasus Reference: KL/P19-1259/R002v3

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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1. INTRODUCTION

1.1 This Green Belt Assessment has been prepared on behalf of Gladman Developments Ltd (Gladman) in respect of their land interests at Camsley Lane, Lymm. Gladman are in control of 13.88 hectares, made up of four parcels (A-D) to the west of Lymm (see Appendix 1). This Green Belt assessment relates specifically to Parcels C and D. Parcel C is known as land north of Camsley Lane and Parcel D is known as land south of Camsley Lane.

1.2 This assessment sets out the relevant national and local planning policy before going on to assess the contribution that the sites make and impact that the development of these parcels would have on the five purposes of Green Belt.

National Planning Policy Green Belt Considerations

1.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The document was initially published in March 2012 and since revised in July 2018 and February 2019. The Submission Version of the Warrington Local Plan (2017-2037) was published for public consultation in April 2019. As such the Local Plan will be considered by the Inspector under NPPF (2019).

1.4 Chapter 13; Protecting Green Belt land of the NPPF sets out the importance of the Green Belt. Paragraph 133 advises that the essential characteristics of Green Belt are their openness and their permanence. Paragraph 134 confirms that the five purposes of the Green Belt are:

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

1.5 Paragraph 136 of the NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances which have been fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.

Green Belt Around Warrington & Local Planning Policy

1.6 The Green Belt around Warrington was first formally designated in the Cheshire Structure Plan 1977 (adopted 1979) with the Green Belt boundary drawn around the existing settlements and the areas outside of the New Town Designation. Later alterations of the Structure Plan in 1985 and

1999 did not change the extent of the Green Belt boundary. Whilst minor amendments to the Green Belt boundary were made through the 1998 Unitary Development Plan, the Local Plan Core Strategy (2014) did not alter the Green Belt boundaries and therefore the current Green Belt boundaries are still based upon the original designation some 40 years ago.

- 1.7 The development plan comprises of the adopted Warrington Local Plan Core Strategy (July 2014). Following its adoption, a legal challenge was made with respect to the housing policies contained within the Warrington Local Plan Core Strategy with the Plan's housing target and reference to the delivery of new homes at the Omega strategic development site being overturned.
- 1.8 Warrington Borough Council (WBC) are in the process of preparing their Local Plan. The Submission Version of the emerging Local Plan was published in April 2019. The Plan is expected to be submitted to the Secretary of State in October 2019 with an estimated date of adoption in December 2020. The emerging Local Plan is supported by a Green Belt assessment prepared in October 2016 (by Arup) to assist WBC in considering whether 'exceptional circumstances' exist to justify altering Green Belt boundaries through the Local Plan.
- 1.9 The Proposed Submission Version of the Local Plan confirms that the primary exceptional circumstance relating to the need for Green Belt release is to ensure that there is sufficient land to meet the borough's development needs over the plan period and beyond. It is clear within the available evidence that there is insufficient land within Warrington's existing urban area and greenfield sites to meet its housing and employment needs going forward. As stated in the Submission Version of the Local Plan, the existing urban area can accommodate around 13,700 new homes. This means there is still the requirement to provide land for around 7,000 homes through the release of Green Belt land.
- 1.10 **Draft Policy DEV1 (Housing Delivery)** outlines a minimum housing requirement of 18,900 new dwellings over the 2017 to 2037 plan period which equates to an annualised requirement of 945 dwellings per annum. In Lymm, 430 homes have been allocated to be delivered over four sites which include;
- Policy OS5 Massey Brook Lane (60 homes);
 - Policy OS6 Pool Lane (40 homes);
 - Policy OS7 Rushgreen Road/Tanyard Farm (200 homes); and
 - Policy OS8 Warrington Road (130 homes).

2. GREEN BELT APPRAISAL

- 2.1 This section assesses the contribution that the land at Camsley Lane (Parcels C and D) makes towards the five Green Belt purposes and the impact that residential development would have on the Green Belt purposes.
- 2.2 The contribution that the Parcels make to the Green Belt purposes has been assessed in accordance with the methodology set out in the Warrington Stage 1 Green Belt Assessment (October 2016), produced by Arup. This includes relying upon the same scoring system with parcels contribution scoring as ¹;

Green Belt Contribution	Colour Code
No Contribution	
Weak Contribution	
Moderate Contribution	
Strong Contribution	

- 2.3 In terms of the impact, the Council’s evidence has not specifically assessed the impact that the release of smaller parcels from the Green Belt will have on the strategic function of the Green Belt. As such, this appraisal assesses the potential impact of a residential development on the Green Belt purposes and any possible mitigation measures to reduce any impact on the Green Belt. In order to assess the impact, we used the following scoring system;

Impact on Green Belt	Colour Code
Low Impact	
Medium Impact	
High Impact	

- 2.4 A ‘high impact’ is considered to have the most effect on the strategic function of the Green Belt and the development of the parcel would be to the detriment of the Green Belt purposes. A ‘low impact’ demonstrates that the development of the parcel would have a limited/no impact on the Green Belt purpose. In this respect, clearly sites which would have a low or medium impact on the strategic function of the Green Belt would be the most appropriate to accommodate future development within the borough.
- 2.5 This Assessment is set out in Table 1.

¹ The colour coding has been altered in comparison to the Council’s assessment. Pegasus Group have used the same colour coding system to reflect impact. Red refers to a strong contribution/high impact and green refers to weak contribution/low impact. This is to make sure there is no confusion and to ensure that this assessment is easy to read and understand.

Table 1 –Contribution to and Impact on Green Belt - Land at Camsley Lane

		Contribution to Green Belt		Impact upon Green Belt
Purpose 1 - To check the unrestricted sprawl of large built up area	No Contribution	The site is detached from the main urban area (Warrington) and therefore makes no contribution to this purpose.	Low Impact	The site is well related to the settlement of Lymm however it is detached from the main urban area of Warrington and therefore the development would have no impact on the urban sprawl of the large built up area.
Purpose 2 – To prevent neighbouring towns merging into one another	Weak Contribution	The site forms a less essential gap between Lymm and the Warrington urban area. Although the development of Parcel D would reduce the actual gap between Lymm and the main urban area of Warrington, the perceived gap would be retained between the towns due to the presence of the M6. The M6 is a strong, durable and defensible boundary which would prevent the merging of these two areas.	Low Impact	Although the development of Parcel D would reduce the actual gap between Lymm and Warrington, the perception of separation would be unaffected with the M6 helping to form a permanent and strong separation between the two settlements even if the site were to come forward for residential development. Overall the development of this site would have a low impact on the overall strategic function of the Green Belt.
Purpose 3 – To assist in safeguarding the countryside from encroachment	Moderate Contribution	<p>Whilst both parcels are undeveloped and have a predominantly rural character, Parcels C and D have different characteristics in respect of this purpose.</p> <p>Parcel C is located adjacent to the existing urban edge to the north east, with strong durable boundaries to the north, east and south in the form of the Transpennine Trail, the Bridgewater Canal and Camsley Lane. A large residential property forms the strong western boundary to this parcel. As such this site is well enclosed with very limited open views into the wider open countryside.</p> <p>Parcel D is slightly detached from the existing urban area, although there are properties immediately south of the canal. This parcel is bound by strong durable boundaries of Camsley Lane (north), Bridgewater Canal (east and south) and the steep embankment of the M6 (west), which would prevent further encroachment into the countryside.</p> <p>There is no built form within the parcels however there is visible built form surrounding the parcels. Added to this, there is no existing access through the parcels or the opportunity for residents to enjoy the countryside in this location.</p> <p>As such the site is only considered to serve a moderate contribution to this Green Belt purpose.</p>	Medium Impact	<p>The development of this site would result in encroachment into the open countryside owing to the lack of built development within either parcel however this would have a limited impact, acknowledging the urbanising effects of the surrounding development and the strong durable boundaries which surround the parcels. These boundaries will be further strengthened through appropriate planting and landscaping which will also help to screen the proposed development. This would also help to prevent further encroachment into the countryside.</p> <p>The site does not currently provide any opportunity for access to the open countryside and the development of the site would help to improve accessibility in the wider open countryside.</p>

		Contribution to Green Belt		Impact upon Green Belt
Purpose 4 – To preserve the setting and special character of historic towns	No Contribution	This parcel makes no contribution to this purpose. Although Lymm is considered as an historic town within the Green Belt Assessment, the site is not well related to the historic core with the site located approximately 700m from Lymm Conservation Area, and therefore well beyond the 250m buffer area referred to in the Green Belt Assessment. In addition, the site does not cross an important viewpoint of the Parish Church. As such, this site makes no contribution towards this purpose.	Low Impact	Although Lymm is designated as a historic town, the site is not located close or well related to the historic core and the parcels do not cross viewpoints from designated heritage assets. Therefore, these parcels would have a low impact upon this purpose.
Purpose 5 – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Moderate Contribution	Although these parcels are considered to make a moderate contribution to this purpose, this is the same for all Green Belt sites noting the need for Green Belt release to accommodate the borough's future development requirements.	Low Impact	As all Green Belt parcels around Lymm and the wider borough are considered to have the same contribution to this purpose and owing to the lack of land within the existing urban area to meet the borough's development needs, the development of this site will have a low impact on this purpose.
Overall Contribution Impact on Strategic Function of the GB	Weak Contribution	This site is considered to make no contribution to two of the Green Belt purposes, a weak contribution to one Green Belt purpose and a moderate contribution to the two remaining Green Belt purposes. As such the site makes a weak overall contribution to the strategic function of the Green Belt.	Low Impact	The development of the site would have a low impact the strategic function of the Green Belt, the impact of which could be further limited through strengthening and enhancing the site's existing boundaries and the opportunity to enhance access to the open countryside in this area.

3. CONCLUSIONS

- 3.1 As described in the assessment, this site makes a **weak contribution** to the strategic function of the Green Belt. The site is detached from the main urban area of Warrington and does not make any contribution towards preventing the sprawl of the main built up area of Warrington. Added to this, the M6 forms the western boundary of Parcel D as well as a dense wooded area. This durable, permanent and strong boundary would prevent the sprawl of the urban areas of Lymm and Warrington area as well as preventing coalescence of these settlements. Although we do recognise that the development of the site would reduce the existing gap between Warrington and Lymm, the presence of this boundary would not reduce the perceived distance.
- 3.2 Although there is no existing built form within the site, it is located adjacent to the existing settlement edge of Lymm and Parcel D is bound by existing development beyond the canal to the south of the parcel. These urban areas are visible from these parcels which impact upon the setting and character of the countryside in this location. At present, these parcels are well contained and comprise of dense vegetation and trees within and around the parcel boundaries which prevent long line views into the open countryside.
- 3.3 In terms of the impact on the strategic function of the Green Belt, this would be low owing to the strong enclosure of both parcels and the lack of public access into the site. In addition, there is the opportunity improve to improve access to the open countryside through the development of these sites as is illustrated in the development framework plan at Appendix 2. Notably, Parcel C is proposed to be retained undeveloped and managed as an area for wildlife enhancements. A new recreational route is proposed within this Parcel which would enhance local residents access to the open countryside and provide links to the wider PRow network. An additional play area is also proposed to be located within Parcel D, providing further recreational opportunities.
- 3.4 Given the **low impact** on the strategic function on the Green Belt, the site is considered to be appropriate to accommodate housing development to help meet the Borough's and Lymm's development needs.

APPENDIX 6

Land at Camsley Lane, Lymm – Development Framework Plan



Parcel A will be retained undeveloped and managed as an area for wildlife enhancement. New recreational route will allow access

Potential to reroute public footpath away from front doors of cottages, through the new public open space.

New dwellings will front onto the M6 with minimum gaps between properties to attenuate road traffic noise

Landscaped areas will form a green gateway into Lymm, which could create a green link between Parcel A and Parcel B

A new landscaped area will include amenity space, a new woodland belt and recreational routes to filter views of the development

Potential public car park and info board, allowing people to walk to the new nature park in Parcel A and walk to the canal via Warrington Road

Overland flow routes, directed along roadways and away from proposed dwellings should be considered in the event of the Bridgewater Canal overtopping in a flood event.

- Site Boundary: 6.64 ha
- Other land in control of applicant
- Proposed residential area: 2.41ha
- Dwellings to front onto the M6 with minimum gaps between properties
- Proposed informal and amenity green space
- Movement & Infrastructure**
- Proposed vehicular access points
- Proposed spine street through development
- Existing bus routes and bus stops
- Key spaces with priority for pedestrian movements
- Proposed pumping station with 15m Coradon Sanitaire
- Proposed car park and information board
- Green Infrastructure & Recreation**
- * Existing vegetation
- * Proposed tree and hedgerow planting
- Proposed locations for Local Equipped Areas for Play (LEAP)
- * Proposed locations for attenuation basin (SuDS) features
- Proposed recreational routes
- * Potential pedestrian/cycle links
- * Potential pedestrian links
- Existing public footpaths
- Existing recreational and traffic free cycle route (Trans Pennine Trail)
- Existing allotment sites
- Existing ditch/Existing water bodies

A	13/06/2019	PM	Amended as per client's comments
Rev	Date	By	Description

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Project	Land at Camsley Lane, Lymm (Site 2)		
Title	Development Framework Plan		
Client	Gladman Developments Ltd		
Scale	1:2000 @ A3	Drawn	PM
Date	June 2019	Checked	JC
Drawing No.	CSA/3643/111	Rev	A