

Local Plan Team
Planning Policy and Programmes
Warrington Borough Council
New Town House
Buttermarket Street
Warrington
WA1 2NH

Date: 13 June 2019 Ref: 067-001

By email: localplan@warrington.gov.uk

Dear Sir or Madam,

Company Registration: 8639260

The Old Rectory, Grappenhall Representations to Proposed Submission Draft Warrington Local Plan

We act for Orncare, a family run business which has operated The Old Rectory Nursing Home in Grappenhall from the day it opened for business in 1988. The Old Rectory currently accommodates 38 elderly residents with a variety of different levels of care need and employs a total of 49 part and full-time staff. Most residents and staff come from the local area.

For some time, Orncare has been considering how best to plan for its future in the face of the considerable challenges facing the residential care sector. Rather than allow rising costs and national cut backs to dictate cut backs at The Old Rectory, which would inevitably risk reducing care standards and is unsustainable in the long term, Orncare is instead proposing to <u>invest</u> in its business, through expanding with improved accommodation.

Representations have previously been submitted on behalf of our client by Emery Planning to the Regulation 18 consultation. These representations build on those previously made, which supported the concept of the Garden Suburn and sought the allocation of the site.

Our client is currently seeking pre-application advice for the construction of a new block of 24 extra care residential apartments (Use Class C2) with additional social care facilities. This would enable up to a maximum of an additional 48 elderly (residents requiring a lower level of assisted care) to be accommodated in the new block before moving into the existing residential nursing home as and when their care needs increase, as they reach their later years. The overall bed spaces at The Old Rectory would increase to a maximum of 86 beds.

Orncare is aware of the Green Belt policy implications and sensitivity of the nearby heritage assets, but has concluded that the proposed expansion is *essential* and necessary to safeguard the sustainable future of this important local business, which Orncare believes can be achieved whilst preserving the character of those assets.



Submission Draft Local Plan

The Council has recently published the proposed Submission Version Local Plan for consultation. The Old Rectory is located within Grappenhall village, which is proposed to remain as a washed over Green Belt settlement in accordance with **Policy GB1**.

However, the Submission Draft plan proposes to release a large swathe of Green Belt land to the South of Grappenhall for the proposed urban extension (referred to as the Garden Suburb), recognised as being essential to help meet future housing and employment needs. Given that Grappenhall Village is listed in draft Policy GB1 as a settlement within the Green Belt, this would effectively isolate the Village as an island of Green Belt within the urban area. Such an allocation would not meet the tests of the purpose of the Green Belt as defined by paragraph 134 of National Planning Policy Framework (NPPF) (February 2019) which are:

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

For the village to be washed over and maintained as Green Belt in the revised Local Plan, paragraph 140 of NPPF states:

'if it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.'

It would be inappropriate to maintain the Green Belt designation for Grappenhall when the surrounding land has been removed to meet the objectively assessed need for growth, as Grappenhall would not contribute or perform any of the Green Belt functions referred to above. This is a case, therefore, where the character of the Village should be protected by other means in accordance with NPPF paragraph 140, such as a conservation area designation. Indeed, the village is already a designated Conservation Area which protects its historic character and heritage value and we have been informed that its retention within the Green Belt was in fact a drafting error.

In order for the Plan to be considered 'sound' it must be positively prepared, justified, effective and consistent with national policy (NPPF (2019) paragraph 35). As drafted, the Plan is currently **unsound** as it inconsistent with national policy in respect of the Green Belt, as outlined above.

We therefore seek that the Plan is amended to remove Grappenhall Village from the Green Belt along with any reference to it being an inset village within the Green Belt.



We also note that the designation of Grappenhall on the proposals map is unclear. The policy text refers to 'Green Belt Settlements' and 'Inset Settlements', however the proposals map shows three types of Green Belt settlement – 'Inset Settlement', 'Green Belt Settlement' and 'Settlement' which do not correlate to the policy text. It would also appear that Figure 6 – Amended Green Belt Boundaries is not consistent with the draft proposals map.

For the avoidance of doubt, Orncare **supports** the principle of sustainable, planned Green Belt release to enable the future development by way of an urban extension to Warrington.

We would be grateful if future correspondence on matters relating to the Local Plan be directed to us as agent. We look forward to receiving confirmation of receipt of this letter, and to working with the Council to develop a development plan which is reflective of both the Borough's and our client's ambitions.

Yours faithfully,



Associate

cc. J Eyes, Orncare