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'Call for Sites'

Warrington Borough Council Local Plan Review

Call for Sites Registration Form

October 2016

Please note this 'Call for Sites' is for five or more dwellings or economic development on sites of 0.25 ha (or 500sqm of floor space) and above, Gypsy, Traveller and Show People and Minerals and Waste sites.

The identification of sites does not imply that the Council considers that the site is suitable for development, either now or in the future. It cannot be taken as representing either an intention to allocate these sites, or as a material consideration in the determination of a planning application.

Potential sites that have been identified will be further tested through the Plan-making process, including through the Spatial Distribution and Site Assessment Process, Sustainability Appraisal/Strategic Environmental Assessment, several stages of public participation and independent examination.

Please also note that all the responses and information received as part of the 'Call for Sites' will be published and made available for public viewing as part of the open and transparent Plan making process.

NOTE: Please read the accompanying guidance note [here](#) before completing this form and complete a separate form for each site that you are submitting to the Council.

Please return your completed form and any accompanying supporting material to Planning Policy, Warrington Borough Council no later than 5.00pm on Monday 05th December 2016.

By e-mail: ldf@warrington.gov.uk

By post: Planning Policy, Warrington Borough Council, New Town House, Buttermarket Street, Warrington, WA1 2NH

Should you require further advice and guidance on completing this form, please contact the Planning Policy Team by telephone on 01925 442841 or by e-mail to ldf@warrington.gov.uk

(1) Your Details

Please provide your contact details and those of your agent (if applicable). Where provided, we will use your Agent's details as our primary contact.

		Your details	Your Agent's details	
Name		PAUL MARTIN		
Position				
Organisation				
Address				
			Town	
			Postcode	
Telephone				
Email address				

(2) Site Details

Please provide the details of the site you are suggesting. If you are suggesting more than one site, please use a separate form.

Name of site /other names it's known by		LAND OFF HIGH LEGU ROAD	
Address		LAND BETWEEN 35 - 49 HIGH LEGU ROAD	
		BLOOMEDGE	
		LYMM	
		Town	CUESHIRE
Postcode		WA13 0RT	
Ordnance Survey Grid Reference		Easting :	Northing :
Site area (hectares)		1.5 ha	
Net developable area (hectares)		1 ha	
What is your interest in the site? (please tick one)		Owner <input checked="" type="checkbox"/>	Lessee <input type="checkbox"/>
		Prospective Purchaser <input type="checkbox"/>	Neighbour <input type="checkbox"/>
		Other <input type="checkbox"/>	Please state:

Please Note: It is essential that you provide a map showing the site's location and detailed boundaries for each submission.

(3a) Proposed future use(s)

Please indicate the preferred use that you would like the site to be considered for. Please also indicate any other uses you would consider acceptable. If you wish the site to be considered for a mix of uses, please tick all uses that apply.

	Residential	Gypsy & Travellers	Employment	Retail	Leisure	Other*
Preferred future use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative future use(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Potential Capacity	houses: 5	Number of Pitches:	SqM	SqM	SqM	SqM
	or flats:					
Employment Use Class (E.g. B1)						
* If "Other", please indicate which use(s):						
Potential Density						
Has any design, viability, master planning work or other studies been undertaken for any proposed use?				Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

(3b) Proposed future use(s) - Minerals and Waste

Details:

(4) Site Ownership

Please record the site ownership details. If there are more than three owners, please record the fourth owner, etc. on a separate sheet. Please indicate the extent of individual landholding(s) on the site map.

If you do not know who owns the site, please state so below.

	Owner 1	Owner 2	Owner 3
Name			
Address			
		Town	
		Postcode	

Or: I do not know who owns the site

Has the owner (or each owner) indicated support for proposed redevelopment?
Please also record these details for the 4th and subsequent owners (where necessary).

Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Don't know	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Are there any Restrictive Covenants & Ransom Strips affecting the site?

No

(5) Market Interest

Please choose the most appropriate category below to indicate what level of market interest there is in the site:

		Any comments
Site is owned by a developer	<input checked="" type="checkbox"/>	
Site under option to a developer	<input type="checkbox"/>	
Enquiries received	<input type="checkbox"/>	
Site is being marketed	<input type="checkbox"/>	
None	<input type="checkbox"/>	
Not known	<input type="checkbox"/>	

(6) Site Condition

Please record the current use(s) of the site (or for vacant sites, the previous use, if known) and the neighbouring land uses.

Current use(s)	OPEN FIELD	
Neighbouring Uses	RESIDENTIAL	
If vacant	Previous use(s)	
	Date last used	

What proportion of the site is made up of buildings, and what proportion is (open) land?

Proportion covered by buildings	0 %	Proportion not covered by buildings	100 %
---------------------------------	-----	-------------------------------------	-------

If there are buildings on the site, please answer the following questions:

How many buildings are there on the site?	NONE	buildings
What proportion of the buildings are currently in use?	% in use:	% 0
	% derelict:	% 0
	% vacant:	% 0
Are any existing buildings on the site proposed to be converted?	NO	

For the **parts of the site not covered by buildings**, please answer these questions:

What proportion of the land is currently in active use?	%	NONE
What proportion is greenfield (not previously developed)?	% (A)*	100
What proportion is previously developed and cleared?	% (B)*	0
What proportion is previously developed but not cleared? (e.g. demolition spoil, etc.)	% (C)*	0

* A plus B plus C should add to 100%.

Please provide any additional comments on a separate sheet if necessary.

(7) Constraints to Development

Please tell us about any known constraints that will affect development for the proposed use, details of what action is required, how long it will take and what progress has been made.

Please use a separate sheet where necessary to provide details. If using separate sheets, it would be helpful to make reference there to the particular constraint, e.g (7)(e) – Drainage.

	Yes, No or Don't know	Nature and severity of constraint *	Action needed, timescales and progress	Confirmed by technical study or by service provider?	
				Yes	No
a) Land contamination	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Land stability	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Mains water supply	YES			<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Mains sewerage	YES			<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Drainage, flood risk	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Tree Preservation Orders	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Electricity supply	YES			<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Gas supply	YES			<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Telecommunications	YES			<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Highways	YES			<input checked="" type="checkbox"/>	<input type="checkbox"/>
k) Ownership, leases etc.	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
l) Ransom strips, covenants	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
m) Other (Please provide details)	None			<input checked="" type="checkbox"/>	<input type="checkbox"/>

(8) Site Availability

Please indicate when the site may be available

Excluding planning policy constraints, when do you believe this site could be available for development?

IMMEDIATELY AVAILABLE

Immediately

(Note: to be "immediately available", a site must be cleared, unless being considered for conversions.)

If not immediately, please state when it could be available:

If the site is not available immediately, please explain why – e.g. the main constraint(s) or delaying factor(s) and actions necessary to remove these:

(9) Any Other Information

Please tell us anything else of relevance regarding this site if not already covered above that will ensure that it contributes positively to the achievement of sustainable development. Please use a separate sheet/s if necessary.

THE SITE COULD CONTRIBUTE TO DELIVER OF LOCAL NEEDS HOUSING, INCLUDING AFFORDABLE HOUSING IN A LOCAL SERVICE CENTRE. BROOMEDGE IS SERVED BY A SHOP, LIME DRESSER, PUBLIC HOUSE & OFFICES.

Planning Policy– Warrington Borough Council,
New Town House, Buttermarket Street, Warrington, WA1 2NH

ldf@warrington.gov.uk

01925 442841

This form is available in other formats or languages on request.



Google Earth

feet
meters



Mr. P. Martin
35 Thorley Lane
Timperley
Altrincham
Cheshire
WA13 0RT

Warrington Borough Council
Planning Policy and Programme
New Town House
Buttermarket Street
Warrington
WA1 2NH

23rd December

Dear Sir / Madam

**Warrington Local Plan Review – Regulation 18 Consultation
Representations on behalf of Peter and Diane Martin**

We set our representations to the Warrington Local Plan Review – Regulation 18 Consultation. We have already submitted a proforma and site plan to the call for sites exercise and these representations are submitted in support of the proposed site at High Legh Road, Broomedge, Lymm and to provide a background narrative to justify the site's release from the Greenbelt and for housing development.

We welcome the Council's decisions to invite comments at this early stage in the review of their Local Plan, as this demonstrates a positive and proactive attitude towards engagement. We wish at the outset to state our support for the proposed Green Belt release and the associated all for sites exercise, which we believe to be an essential step in securing sufficient housing land to meet the Borough's needs and facilitate the Borough's intended growth.

However, as detailed below, we question the Council's evidence base and in particular the basis on which the Council's consultants, Arup, have undertaken a partial Green Belt Assessment.

Site Description

The land being promoted for release from the Greenbelt is approximately 1.1 ha of land, in private ownership, located to the west of High Legh Road, Broomedge (see attached plan0. The site has no development or legal constraints and is therefore considered immediately available and deliverable.

The site is situated between two existing houses (numbers 35 and 49, High Legh Road), within the washed over Greenbelt settlement of Broomedge. The land has been sporadically used for agricultural purposes, is flat and does not suffer from any flooding or drainage issues.

Broomedge is a relatively small but sustainable settlement located to the west of Lymm. There are two public houses, a village shop, hardware store, post office, hairdresser, car showroom, motor mechanics, body shop and children's nursery all situated within the settlement and within easy walking distance of the site. Broomedge is also on the main Warrington to Altrincham bus route.

The site is well contained to the rear by existing mature hedgerows and trees and is bound on either side by two existing houses. The site is therefore well contained and is essentially an in-fill opportunity.

Development Capacity

The site could accommodate approximately 10 – 20 new homes, including a mix of open market and affordable homes. The main vehicular access would be off High Legh Road.

Further details, including a site masterplan will be submitted before the formal Regulation 18 Consultation in May 2017.

Evidence Base

The overall range of evidence seems to be appropriate for this stage of plan process, although a number of documents will need to be updated and of particular relevance to the subject site will be the need to undertake further Green Belt Assessment to assess all the Green Belt across Warrington, rather than just the parcels that have been considered so far.

As the subject site has not been assessed in the Green Belt Assessment, an assessment against the five purposes of the Green Belt is provided below. Had the site been assessed in the context of the five purposes Green Belt, it would have been positively scored.

Green Belt Purpose Assessment

Green Belt Purpose	High Legh Road Site
Purpose 1: to check the unrestricted sprawl of large built up areas	Low contribution: Existing and strong boundary features to all sides mean that the site is a self-contained parcel. Release of the land for infill development would not lead to any unrestricted sprawl.
Purpose 2: to prevent neighbouring towns merging into one another	Low contribution: The development of the site would not merge any settlements.
Purpose 3: to assist in safeguarding the countryside from encroachment	Moderate contribution: As with all Greenbelt sites, the development of the site would inevitably result in some open countryside. However, the site has no intrinsic landscape character or beauty. The existing and strong boundary features to all sides will safeguard all the surrounding open countryside.
Purpose 4: to preserve the setting and special character of historic towns	No Contribution: Lymm and Warrington are both historic villages and towns but neither are close enough for the site to comprise setting or character. There are no listed buildings, conservation

	areas or views of parish churches and consequently development of the site would not impact upon any historic context.
Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	No Contribution: As noted, the Council fully accept that there is insufficient land within Warrington's existing urban and greenfield sites to meet its own needs for employment and employment land going forward.
Overall Assessment	LOW CONTRIBUTION

It is our intention to submit a Landscape Character Assessment to the next stage of the Local Plan Review as evidence as to the suitability of the land for release from the Green Belt.

Housing Needs and OAN

The Mid Mersey SHMA sets Warrington's individual housing needs at an OAN of 839 dpa. The SHMA addendum however identifies a higher requirement of 984 dpa due to increased job growth projections from Cheshire and Warrington LEP.

We would encourage the higher OAN figure should be taken as the Local Plan figure so as to not stymie growth.

Spatial Distribution

When considering the best and most appropriate locations to accommodate development, the Council need to assess all spatial options. By excluding Broomedge from the Green Belt Assessment it is clear that all spatial options are not being considered, without justification as to why.

It is therefore important to assess all the Green Belt within Warrington and the spatial options, as the decisions taken during this Local Plan review should endure for 30 years.

Para 85 of NPPF confirms that where necessary Local Plans should provide safeguarded land to meet the longer term development needs stretching well beyond the plan period and that LPA's should satisfy themselves that Green Belt boundaries will not need be altered at the end of the development plan period. The NPPF (para 157) goes on to advocate a 15 year plan horizon

In considering the 30 year timescale of the Green Belt boundaries to be set during this Local Plan review, it is inconceivable that Broomedge will see no new housing over this period. There are local housing needs not being met and the services/amenities/businesses in Broomedge need to be sustained by modest levels of new housing, including affordable housing, over the life of the Local Plan and the next.

Indeed in delivering new housing, the relative affluence of Broomedge would ensure that there would be no viability issues in meeting the full affordable housing policy requirement, whereas other locations may not deliver the full quantum of affordable housing on viability grounds.

Overall the Council should be providing for a range a choice of housing types and locations and a small development in Broomedge would accord with this requirement.

Green Belt Boundaries

Para 84 of NPPF notes that LPA's should consider the consequences for sustainable development of channelling development towards:

- Urban areas inside the Green Belt Boundary
- Towards towns and villages inset within Green Belt Boundary and
- Locations beyond the Greenbelt boundaries

The clear emphasis here is that all options are to be considered and based upon the scope of the current Green Belt Assessment, the Council have not considered all options.

Furthermore, para 85 of NPPF recognises that Local Plans "*should not include land within the Green Belt which is unnecessary to keep permanently open*".

Para 86 of NPPF states:

"If it is necessary to prevent 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 villages needs to be protected for other reasons, the means should be used, such as conservation area of normal development management policies, and the village should be excluded from the Green Belt"

There is a clear justification for taking the whole settlement of Broomedge out of the Green Belt and defining a new boundary to provide for limited development over this and the next plan period.

Summary

In summary:

- We support the notions of Green Belt release to meet the Council's housing and employment land needs.
- We believe the assessment of spatial options to date has not been wide enough and has not considered all option, particularly land in Broomedge.
- We think that there are compelling reasons to allocate the land in Broomedge, shown edged red on the attached plan, for housing development to meet the village's needs.
- Further, we believe the settlement should be taken out over the Green Belt and a new Green Belt boundary be drawn.

I trust that these representations will be duly taken into consideration and I look forward to engaging with the Council at the next stage of the plan making process.





Google Earth



18th April 2017

Warrington Borough Council
Planning Policy and Programme
New Town House
Buttermarket Street
Warrington
WA1 2NH

Dear Sirs

Broomedge, Lymm, Warrington

As part of this correspondence, prepared on behalf of Peter and Diane Martin, we provide a planning review of Broomedge, a village settlement located to the east of Lymm, Warrington.

We consider the settlement in terms of its key characteristics and services and comment on adopted and emerging planning policies for the area and comment on their consistency with the NPPF, particularly in relation to the NPPF stance on supporting rural communities, meeting housing needs and the approach to undertaking Green Belt reviews.

The purpose of the letter is to inform the emerging Warrington Local Plan particularly in relation to the above points and to highlight that Broomedge is a settlement that could accommodate a modest level of growth, which will assist in ensuring it remains a vital and viable settlement with a range of community facilities.

We also highlight why the Council's current Green Belt assessment not review a number of the settlements located within the Borough that are currently washed over by Green Belt. It is therefore incomplete and subsequently inconsistent with the NPPF. If the Local Plan proceeds on this basis, our view is that it would be deemed unsound. We therefore respectfully request that the Council's consultants preparing the Green Belt review are instructed to look at this matter in detail. Given the former UDP identified boundaries for these settlements, we do not consider this would be a significant undertaking but it does need to be formally addressed.

The Settlement

The village of Broomedge contains a population of less than 2,000 people (based on SOA Warrington 21F), which also includes some residential dwellings on the fringe of Lymm/Rush Green.

Properties range from large multi-bedroom detached dwellings, standard family homes and smaller post war, semi-detached homes.

The heart of the village contains a crossroads with the A56 (Higher Lane) running east/west and the B5159 (Burford Lane/High Legh Road) running north/south. Located on/adjacent to the crossroad is a good sized, local convenience store/post office/hardware store (Costcutter / Post Office), a pub (Jolly Thresher), office space, and bus stops. Other services in the village include a further pub (Wheatsheaf Inn), Air Cadets Training Centre, an equipped play area, and a vehicle repair garage/petrol station albeit the latter is located just outside the Borough boundary.

The extent and frequency of bus services running through the settlement is good. Services include the 35, 43, 47, 191 and 289 which provide services to Lymm and Warrington, Altrincham,

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Registered Office: Pegasus house, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT

Northwich, High Legh, Little Bollington and Partington. Services to Lymm, Altrincham and Warrington run every hour during the day (10-5). Services to Northwich and High Legh are less frequent with 3 services running a day.

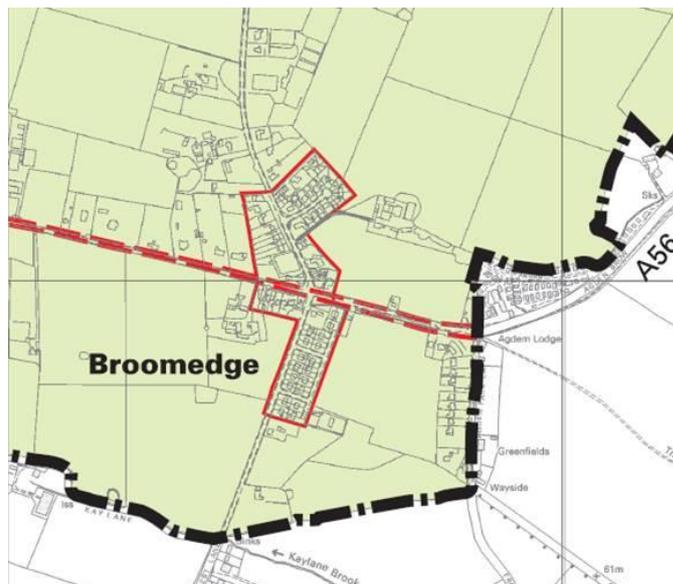
Planning Policy

Local Plan (Adopted)

The adopted Local Plan comprises of the unchallenged parts of the Warrington Local Plan Core Strategy, which was adopted in 2014.

The supporting Proposals Map illustrates that the settlement is washed over by Green Belt but there is also a defined settlement boundary from Broomedge, which does not include all of the dwellings and physical features within the settlement but the main core which runs along High Legh Lane and Burford Lane.

The extract below is from the former UDP proposals map but the boundary has not altered as part of the Core Strategy Local Plan. Indeed, with regard to villages that have been excluded and washed over by Green Belt, there has been no alteration to their status since the former UDP was adopted in 2006.



Policy CC 1 – Inset and Green Belt Settlements lists those settlements within the Borough that are inset (excluded) from the Green Belt and those that are washed over. Broomedge is one of 12 settlements that are washed over by the Green Belt, whilst a further 10 larger villages/towns are inset within the Green Belt (excluded). The policy goes on to note the following in relation to the washed over settlements:

'Within these settlements development proposals will be subject to Green Belt policies set out in national planning policy. New build development may be appropriate where it can be demonstrated that the proposal constitutes limited infill development of an appropriate scale, design and character in that it constitutes a small break between existing development which has more affinity



with the built form of the settlement as opposed to the openness of the Green Belt; unless the break contributes to the character of the settlement.'

The supporting text to Policy CC 1 clarifies that this approach was adopted on the basis of seeking to control the spatial distribution of development across the Borough. Indeed, Paragraphs 17.3 and 17.4 state the following:

'With regards to the Countryside's constituent settlements, a distinction has been made between those which are regarded as 'Inset' settlements (that are excluded from the Green Belt) and those that are regarded as 'Green Belt' settlements (that are washed over and within the Green Belt). Policy CC1 identifies which of the borough's settlements fall within each of the classifications and the Proposals Map identifies individual settlement boundaries.'

The Overall Spatial Strategy sets out the quantity and distribution of development within the borough and directs growth towards the urban area of the town of Warrington. Policy CC1 helps to implement this approach by requiring development proposals to conform with Local Plan Core Strategy policy CS1 and specifically, with regards to Green Belt settlements, through guiding the scale and nature of development likely to be deemed appropriate in such locations. This approach alongside evidence which suggests that development opportunities within the countryside and its constituent settlements are limited, is such that any growth within these areas should be organic.'

As noted above, the commentary in paragraph 17.3 reflects a position that has simply been transferred from former UDP (i.e. there has been no change in terms of which settlements fall within and outside the Green Belt since at least 2006). Moreover, the reason for retaining this distinction between the settlements was on the basis of a spatial strategy that continued to focus development towards Warrington. It was also in the context of a strategy that did not propose a review of the Green Belt across the Borough.

The housing requirements presented by the Council in the Submitted Local Plan equated to 500 dwellings per annum between 2006 and 2027. However, by 2012 a total of 5,075 dwellings had already been delivered, with completions in 2006 exceeding 1,362 and in 2007 over 1,500 dwellings where completed. Sufficient housing supply was available for the remaining requirement and Policy SN1 confirmed that 80% of new homes will be delivered on previously developed land within the Borough, with 60% in Inner Warrington and 40% in the suburban areas of Warrington and the Borough's outer lying settlements. As such, the Core Strategy planned for a reduced level of housing completions over the remainder of the plan period and it was deemed that exceptional circumstances did not exist to review the Green Belt.

The Inspector's report for the Core Strategy highlights that no Green Belt review was deemed necessary. In addition, there is no comment within the Inspectors report (and we are not aware of any evidence that was prepared) in relation to the role of each village in terms of their contribution to the role and function of the Green Belt. Put simply, a case for Green Belt review was never advanced by the Council and therefore there was very limited focus in relation to the needs of those settlements that fell within the Green Belt.

However, the housing policies of the Warrington Core Strategy Local Plan were subsequently challenged successfully through the Courts. As such, the housing policies of the Core Strategy are omitted from the adopted version of the plan and the Council are now progressing a new Local Plan to address this issue.



Local Plan (Emerging) and Associated Evidence Base

The emerging Local Plan is at an early stage. It represents a Review of the Adopted Local Plan but in light of the fact that housing policies were never formally adopted as part of that process, the spatial distribution of development is a matter that needs to be reconsidered from the very outset. Indeed, SEA Directives dictate that all new plans that identify land for development have to identify and assess alternative development scenarios, collect base-line monitoring information, assess environmental impacts and carry out consultation.

To date, the emerging Local Plan underwent a Regulation 18 (Issues and Options) consultation between 24th October and 5th December 2016. The evidence base underpinning the Council's initial thoughts process included the following key documents (all dated October 2016):

- Mid-Mersey Strategic Housing Market Area Assessment (SHMA) (BE Group / Mickledore);
- Review of Economic Forecasts and Housing Numbers (Mickledore);
- Economic Development Needs Assessment (BE Group / Mickledore);
- Urban Capacity Statement (Warrington BC); and
- Green Belt Assessment (Arup).

As part of our client's representations to the Issues and Options stage (see attached) we noted that there were still some key pieces of evidence that were missing that would need to be undertaken prior to the publication of any preferred options for the Local Plan. As part of separate representations Pegasus made, we noted that all of the above documents would need advancing further as well as all the documents listed in Appendix 2 of the Issues and Options paper would be required.

The need to co-operate with neighbouring authorities under the 'Duty-to-Co-operate' requirements under the Act will also be a key consideration moving forward.

Housing Needs

The 2016 SHMA concludes that the objectively assessed housing need across the Mid-Mersey Housing Market Area (HMA) is 1,756 dwellings per annum (dpa). In terms of Warrington's individual needs, an annual requirement of 839 dwellings per annum (dpa) (to include 220 affordable units), and an additional 62 bed spaces per year in Care Homes (specialist housing for elder people) is identified up to 2037 (see paragraph 2.6 of the Issues and Options document).

The SHMA Addendum identifies a higher requirement of 984 dpa due to increased job growth projections from the Cheshire and Warrington Local Enterprise Partnership's (CWLEP) devolution proposal which aims to create 31,000 additional jobs in the Borough from 2015 to 2040.

As part of Pegasus representations to the recent consultation period, we also set out why we consider the objectively assessed housing needs for the Borough will exceed 1,000 dpa based on the latest demographic figures for the Borough or a market-led analysis.

We note that the Council have proposed a 20-year plan period (2016-2036). Assuming an annual housing need of 1,000 is confirmed, 20,000 homes will be required. However, irrespective of what housing requirement is ultimately adopted, it is clear that it will significantly exceed the 500 dwellings per annum requirement that was being advanced through the adopted Core Strategy (particularly when considering the Core Strategy was originally planning for even lower housing



delivery rates during remaining parts of the plan period post adoption – See Appendix 2 of the Core Strategy).

Urban Capacity

The Urban Capacity Statement calculates the total capacity for housing within the borough on existing urban sites and greenfield sites outside the Green Belt. This calculation adds the 2016 SHLAA figure for the period 2016-2031, the predicted windfall figure for the same period, and the additional capacity identified through a masterplanning exercise of the town centre commissioned by Warrington & Co.

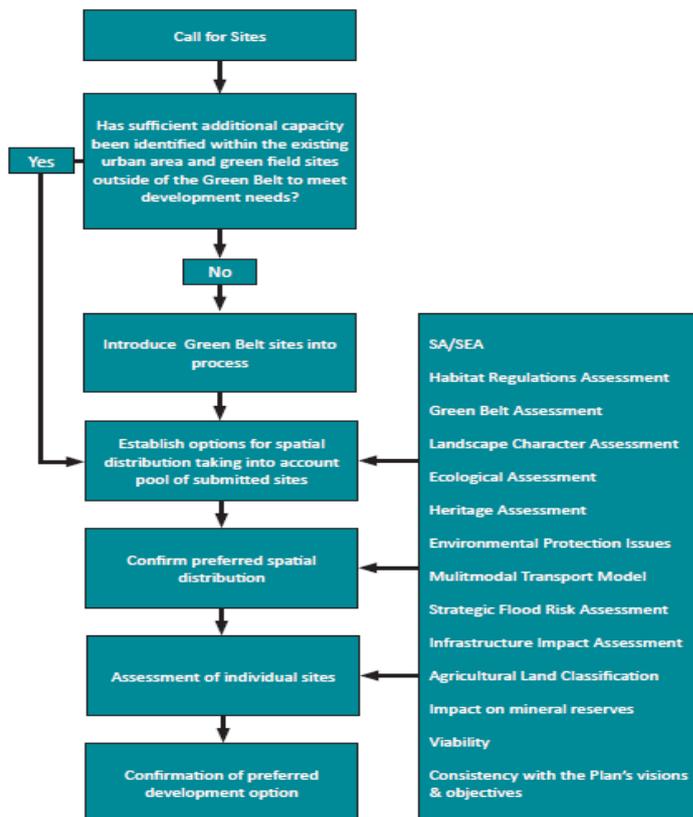
The calculation and resultant capacity is set out below:
10,806 (SHLAA Total) + 3,460 (Additional Masterplanned Capacity) + 960 (Windfall) = 15,226

This suggests that approximately 5,000 dwellings will need to be accommodated via a release of Green Belt land in order to meet the target of delivering 20,000 new homes in the next 20 years.

Whilst we have not assessed every site within the Council’s claimed supply at this stage, we have noted several inconsistencies in the Council’s figures through our representations to the Issues and Options consultation process. In short, we conclude that at least **6,500 new dwellings will be required to be delivered in the Green Belt** if the Council are to achieve the required 20,000 dwelling target.

Spatial Distribution

Appendix 2 of the Issues and Options document (see below) sets out the Council’s approach to defining spatial distribution.

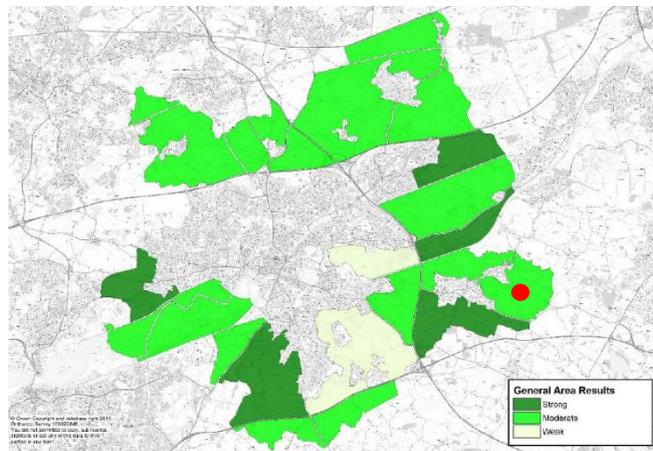
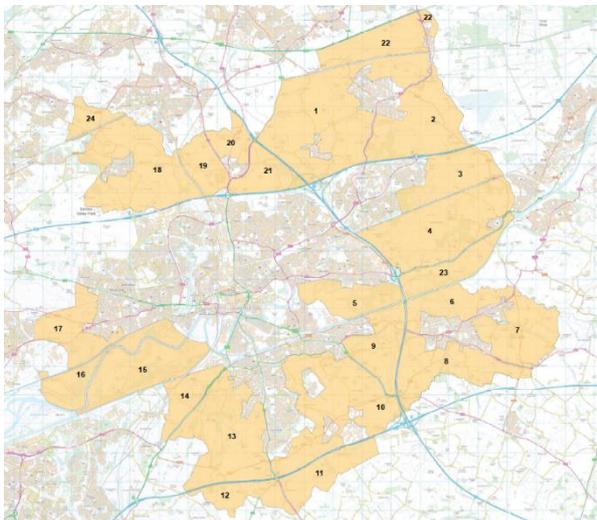


It is clear that the introduction of Green Belt sites for development purposes is incumbent on the findings of the housing and employment needs assessments and urban capacity study, and the spatial distribution of development will be influenced by a series of documents (including the Council’s Green Belt assessment).

We note that there is no mention of a settlement hierarchy assessment or an assessment that specifically looks at the needs of individual settlements and rural communities, which we would expect to see as part of the evidence base for a Local Plan.

Green Belt Assessment

The Council’s Green Belt Assessment undertakes a high-level assessment of 23 large Green Belt parcels across the Borough. Broomedge is located within large parcel nos 7. That parcel has been ranked as making a ‘moderate’ contribution in terms of its function in relation to the 5 purposes of Green Belt by ARUP (see below).



General Area Results
 Moderate
 Weak
 No contribution

● Broomedge

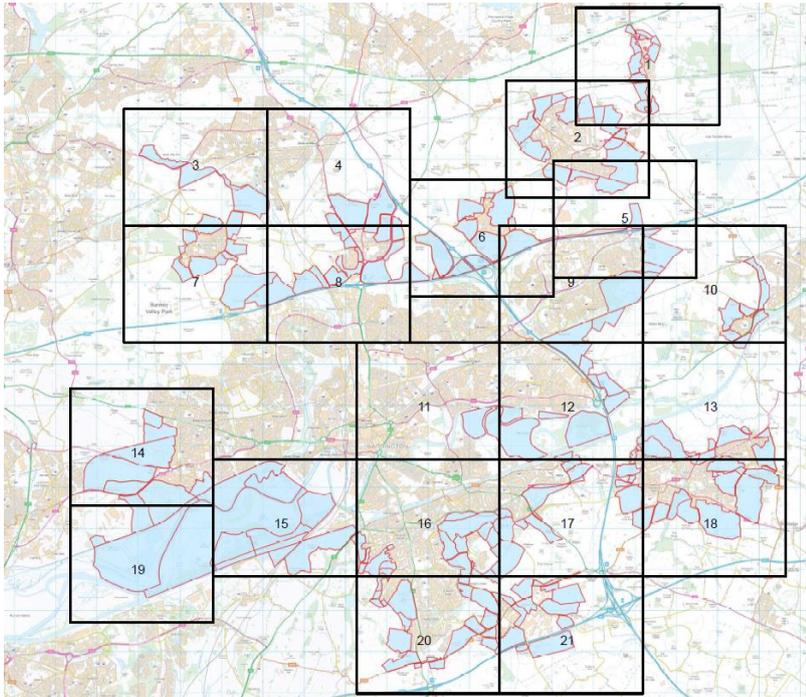
7	No contribution. The GA is not adjacent to the Warrington urban area and therefore does not contribute to this purpose	No contribution. The GA does not play a role in preventing towns from merging.	Strong contribution. The GA is well connected to the open countryside given it is only connected to the inset settlement of Lymm along the western boundary. The boundary between the GA and the inset settlement consists of the limits of development which is not durable and may not be able to prevent encroachment. The boundary between the GA and the open countryside consists of the River Bollin, the A56, Spring Lane and field boundaries. Not all of these features are durable and may not be able to prevent encroachment in the long term. The existing land use predominantly consists of open countryside although includes the washed over village of Broomedge and Hestley as well as Lymm High School and Lymm Marina. The GA supports a moderate to strong degree of openness given that it has less than 20% built form and low levels of vegetation. Overall the GA makes a strong contribution to safeguarding from encroachment	No contribution. Lymm is a historic town however the GA is over 250m from Lymm Conservation Area. The GA does not cross an important viewpoint of the Parish Church.	Moderate contribution. The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the parcel makes a moderate contribution to this purpose.	The GA makes a strong contribution to one purpose, a moderate contribution to one and no contribution to three. Professional judgement has been applied and the GA has been judged to make a moderate contribution overall to the Green Belt. While the boundaries between the GA, Lymm and the open countryside are weak and would not prevent the town from encroaching into the countryside, the GA contains a considerable amount of development including two washed over villages. This compromises its openness and means that the GA does not contribute to the Green Belt in a strong and undeniable way as would be required to make a strong contribution overall. The GA also does not prevent towns from merging, does not check unrestricted sprawl as it is not adjacent to the urban area and does not preserve historic towns as it is not close to the Lymm Conservation Area.	Moderate contribution
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Notably, Arup highlight that the parcel makes no contribution to 3 of the 5 purposes. The 5th purpose which relates to the contribution to the regeneration of Brownfield sites is applied at a moderate level to every parcel in Warrington.

The only strong contribution relates to purpose 4: safeguarding encroachment into the countryside. Even then, Arup consider the parcel makes a moderate to strong contribution and confirms the

parcel includes a large amount of development including the two washed over villages of Broomeedge and Heatley, indicating that even this purpose is compromised.

Arup go onto assess smaller parcels. However, this is only in relation to parcels surrounding Warrington and the inset villages (see below). No assessment is carried out in relation to Broomeedge. We respectfully request that this is fully addressed before the Local Plan is continued in order for the plan to be consistent with the NPPF.



Requirements of the NPPF

At this point it is pertinent to highlight some key paragraphs in the NPPF in relation to the need to support rural communities and the approach to reviewing Green Belt.

With regard to supporting rural communities, paragraph 28 states the following in relation to the need to support growth in rural areas:

'Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- *promote the development and diversification of agricultural and other land-based rural businesses;*
- *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and*



visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and

- *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.'*

Paragraph 55 goes on to state:

'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside...'

In this case, we have already highlighted that Broomedge contains a number of key services. Clearly an element of growth would assist in ensuring these services continue to remain viable into the future, which is considered to be a key sustainability consideration.

Moreover, given the Borough will now have to deliver a far higher level of housing over the entirety of the plan period than that envisaged as part of the Core Strategy, Broomedge could also represent a sustainable location to meet a modest element of this requirement.

The delivery of some market housing would also ensure that affordable homes could be provided for local people. Indeed, the growth of Broomedge in the past has included the delivery of Council housing and there may well be particular local needs within the village that need to be addressed. Indeed, this would be entirely consistent with Paragraph 54 of the NPPF which states:

'In rural areas.....Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.'

We have also highlighted that Broomedge contains a good number of bus services providing sustainable connections to the main areas of service, employment and retail within the vicinity. Whilst those services will not be as regular as might be the case in larger settlements, paragraph 29 of the NPPF already recognises this dynamic and states:

'The Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.'

In light of this policy advice, the role, function and needs of the villages washed over by the Green Belt within the Borough should not be ignored. Indeed, the delivery of further residential development in the village would not represent 'isolated homes in the countryside' and would help to assist meeting a modest level of housing need in an entirely sustainable manner.

Green Belt policies in the NPPF are not a blockade to such an approach. Paragraph 85 confirms that when reviewing Green Belt boundaries, Local Authorities should '**not include land which it is unnecessary to keep permanently open**'. Moreover, Paragraph 86 clearly states the following in relation to villages within the Green Belt:

'If it is necessary to prevent 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.'

This was a new policy requirement introduced by the NPPF which requires an assessment of villages within the Green Belt in terms of their contribution to openness. As noted above, no such assessment was carried out in relation to the adopted Core Strategy.

Broomedge Green Belt Boundary

In the case of Broomedge, we would accept that parts of the village display elements of openness that could be said to contribute to the openness of the Green Belt. For example, the fields that separate the properties fronting Agden Park Lane and those on High Legh Lane/Park Road create a sense of openness.

However, as previously noted each of the villages (including Broomedge) already have defined boundaries as set out on the Core Strategy Proposal Map. In the case of Broomedge, this boundary focuses on the core of the village which is not open and comprises a level of density and development that warrants its exclusion from the Green Belt. Indeed, as part of the emerging Local Plan, Arup have already concluded that Broomedge and Heatley represent built form that impacts on the openness of the Green Belt already and therefore there is a strong case that those villages should be omitted from the Green Belt.

At the very least, those areas defined on the adopted Proposals Map should be omitted from the Green Belt based on this policy advice and assessment. However, the NPPF points to the need to carry out a specific review of each settlement and each village will have evolved (however slightly) since the boundaries were first defined as part of the UDP in 2006.

In the case of Broomedge, our client would seek, as a minimum, to have their property (purple area below) included within the existing settlement boundary. The property is situated directly on the edge of the currently defined boundary and the property has been subject to sizable extensions since 2006 linking the main house with the formerly separate converted barn/garage building to the rear. There may be other similar instances/examples elsewhere on the edge of the defined boundary that now need to be reconsidered/included.

For instance, we are aware of an approved application for 14 houses to the north of the village at Willpool Nurseries and Garden Centre on Burford Lane, reference: 2015/26642. This application demonstrates the village is changing and expanding and supports our view that this village should be reviewed, not be washed over by the Green Belt, and represents a sustainable location for continued and additional modest growth.



Relevant Examples

We believe the approach we have set out above would be consistent with Green Belt reviews carried out elsewhere. Those that we are familiar with include Tandridge and Guildford (see links below).

- <http://www.tandridge.gov.uk/Planning/planningpolicy/emergingpolicy/technicalassessments.htm>
- <http://www.guildford.gov.uk/newlocalplan/gbcs>

In both cases, villages have been assessed in terms of their contribution to the openness of the Green Belt and in areas where that contribution is limited, the settlements have subsequently been inset/excluded from the Green Belt.

Conclusion

Overall, we welcome the fact that the Council are embarking on a full review of the adopted Core Strategy. We also recognise that it will ultimately be the Council's decision to determine what is the best way to accommodate the development needs of the Borough (subject to the findings of an independent examination by the SoS).

However, based on the evidence prepared to date, we consider the Council have largely ignored the rural settlements located within the Borough. We accept such settlements will not accommodate significant levels of development. However, it is equally vital that rural communities contribute to the objectives of sustainable development. Indeed, the lack of any growth will lead to stagnation and ultimately loss of services and would therefore run counter to the objectives of the NPPF.

Importantly, in advancing the Local Plan, the Council have to consider a range of options to deliver the increased housing and employment needs of Warrington over the next 20 years. This is specifically stipulated by the SEA Directives, which require all reasonable alternatives to be explored. In this context, we would advocate that reasonable alternatives would include those set out in the NPPF. Paragraph 84 of the NPPF is particularly pertinent in this respect and states:

'When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.'

It is therefore clear that the NPPF requires a broad range of spatial distribution patterns to be tested. However, before the above process can be carried out, the Council need to set out the following in relation to the evidence base:

- The need to deliver over 1,000 dwellings per annum to meet housing needs and job growth ambitions through updates to the Strategic Housing Market Area Assessment (as required by paragraphs 14, 19 and 47 of the NPPF);
- Review the Green Belt boundaries around the villages currently washed over by the Green Belt in line with paragraphs 85 and 86 of the NPPF; and

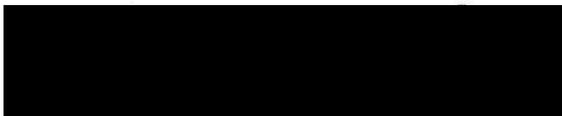


- Consider the needs of villages within the Borough in terms of ensuring local needs are addressed and rural communities are able to continue to rely on the services that they currently benefit from in line with paragraph 54 and 55 of the NPPF.

In carrying out this additional work, we believe there are strong arguments and facts that would lead to Broomedge being identified as a village settlement that can be omitted from the Green Belt (with the precise boundaries to be defined) and that some moderate additional growth would help meet local needs and support/sustain existing services within the local community.

We trust the above information is useful and we would very much welcome the opportunity to meet with officers to discuss this further.

Yours sincerely



Sebastian Tibenham
Regional Director

