



Paul Butler Associates

Planning, Development & Heritage Consultants

05 December 2016

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

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Sent by email 05 December 2016

Dear Sir / Madam

Call for Sites Nomination and Local Plan combined response: Land adjacent to Lymm Rugby Club, Lymm

I am writing on behalf of my client FH Cookson & Sons to nominate a site as part of the Local Plan Review Call for Sites exercise. This letter accompanies the completed 'Call for Sites Registration Form' dated 05 December 2016 and a Site Location Plan (Appendix A).

The nomination relates to an edge of settlement site forming land adjacent (west) to Lymm Rugby Club (*grid ref Easting: 368316 Northing: 386625*). The site is identified by the submitted Site Location Plan. The site is approximately 8 hectares in size and as part of this nomination, on behalf of my client FH Cookson & Sons, we suggest that the site could be used for new housing development. There are no significant constraints or designations affecting the future development of the site that could not be overcome during the design process. The site is considered to be a suitable location for residential development and could be achievable within 0-5 years.

The remainder of this letter examines the following to support our client's submission:

- The suitability of the site for removal from the green belt providing an assessment of the site and its performance against the five purposes of the green belt set out in paragraph 80 of the NPPF;
- An assessment of the site's performance against the sustainability appraisal objectives adopted by the Council as part of the Spatial Distribution and Site Assessment Process; and
- The deliverability of the site in the context of paragraph 47 of the National Planning Policy Framework.

Green Belt Removal

Warrington Borough Council (WBC) appointed ARUP Consultants to provide a review of green belt boundaries (Green Belt Assessment October 2016). Whilst the overall methodology and approach of the green belt review would appear to be in accordance with best practice, the area based and site specific conclusions reached in the assessment, which are based on professional judgement, do not in all cases, in our professional opinion adequately reflect the contribution of certain sites in green belt terms. This is explored further below.

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Our clients interest at land adjacent to Lymm Rugby Club is included in General Area 8 and part of parcel LY23.

General Area Results and Parcel Identification

The identification of the general area parcels within the report is considered inadequate. The area of Lymm and Rush Green should be subdivided into further parcels in order to reflect recognisable and permanent boundaries. Parcel 7 for instance covers an area between Lymm and Rush Green which is divided by the Bridgewater Canal. It is submitted that this is a permanent and distinguishable boundary which separates two distinctly different areas.

Similarly, Parcel 8 extends from the south eastern edge of Lymm west towards the M6 with the A56 as the northern boundary. This area is vast and is divided by the local wildlife site of Lymm Damm which runs north – south from the centre of Lymm. This is a permanent and recognisable feature within the landscape. The land east of the wildlife site displays greater attachment to Lymm and is not appreciated as part of the same parcel as land to the west towards the M6.

The process of parcel identification is therefore not considered to be an appropriate basis for analysis and therefore undermines the subsequent assessment from the outset.

Performance of Parcel LY23 against green belt purposes

The Green Belt Assessment at Appendix G examines the contribution of smaller parcels of land against the five purposes of including land within the green belt. Parcel LY23 is identified within this assessment as having a moderate contribution.

We have reviewed this assessment and provide our own judgement, please refer to Appendix B.

Our assessment highlights that the parcel is adjacent to the existing settlement and bounded by strong physical features, including a main road and strong tree belt which provides a continual containment around the perimeter of the site. This would prevent any development within the parcel from encroaching beyond the parcel boundary into the open countryside in neighbouring parcels, and hence if developed would be likely to have a minimal impact on the overall openness of the Green Belt. We therefore conclude that the site makes a weak contribution to the purposes of including land within the green belt.

The site is also within a sustainable location in close proximity to local services and facilities in the town of Lymm.

Performance of the Site against Sustainability Appraisal Objectives

The Local Plan Scope and Content consultation establishes that the removal of land from the green belt will be required in order for the Council to deliver their objectively assessed housing requirement. Appendix 2 of the consultation document sets out WBC's site selection methodology. The green belt assessment is one part of this process, potential development sites will also need to be considered in terms of their performance against certain Sustainability Appraisal / Strategic Environmental Assessment objectives. These objectives are outlined in the SA Scoping Report which forms part of the consultation evidence base. The Scoping Report at

Appendix A provides a draft Site Appraisal Framework which the Council will use to consider the site's performance against key sustainability indicators.

Utilising this site appraisal framework, we provide an assessment of the site's performance against these key indicators. This is included at Appendix C to this letter.

The appraisal demonstrates that the site offers a sustainable and accessible location for new housing development. The site is approximately 1000metres from the centre of Lymm and benefits from good access to public transport infrastructure and local schools.

Where the appraisal identifies potential environmental effects it is considered that these can be mitigated as part of the design process and are not considered to be significant in terms of their magnitude. Our client would be happy to work with the Council and undertake further assessment work in relation to certain environmental issues if this is of assistance to the Council as part of the plan making process.

Delivery

The National Planning Policy Framework requires that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable (*NPPF para 47, footnote 11*).

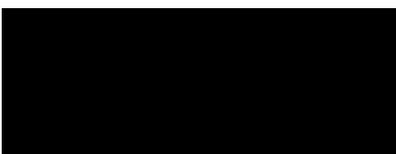
As evidenced in this submission, the site is available now offering a suitable location for new development. The site is considered to be a viable and realistic proposition that will make a significant contribution to housing delivery over the plan period. There are also no known constraints that would affect delivery of housing commencing on site within 5 years.

Summary

In order for WBC to meet its objectively assessed housing need it is evident that sites will need to be removed from the green belt. The site adjacent to Lymm Rugby Club offers an attractive site for green belt removal due to its natural containment. The site is also highly sustainable and accessible and will allow direct access on foot for new residents to local schools and the town centre.

We trust that our comments will be taken on board during the site assessment process for the preferred options stage of the Local Plan. We would be happy to discuss the delivery of the site further with the Council if this is of assistance.

Yours faithfully



Julian Austin BSc (Hons) MPLAN MRTPI
Senior Planner

Appendix A: Land adjacent to Lymm Rugby Club: Site Location Plan



Appendix B: Land adjacent to Lymm Rugby Club: Green Belt Assessment

LY23 Parcel Assessment

Ref	Purpose 1: to check the unrestricted sprawl of large built up areas	Purpose 2: to prevent neighbouring towns merging into one another.	Purpose 3: to assist in safeguarding the countryside from encroachment	Purpose 4: to preserve the setting and special character of historic towns	Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Justification for Assessment	Overall Assessment
LY23	No contribution: The parcel is not adjacent to the Warrington urban area and therefore does not contribute to this purpose.	No contribution: The parcel does not contribute to preventing towns from merging.	Weak contribution: The parcel is connected to the settlement on its eastern boundary and is well contained on the western and southern perimeters by a substantial tree belt which limits the degree of openness experienced. The durable boundaries of this parcel would ensure no encroachment into the countryside should this parcel be developed.	Moderate contribution: Lymm is a historic town. Whilst the site is not within the conservation area it is adjacent to it. Development on this site however could be brought forward without any material harm on the character and appearance of the conservation area.	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 parcel makes a weak contribution to one purpose, a moderate contribution to two and no contribution to two. Development within this parcel would be well contained having a minimal impact on the overall openness of the green belt.	Weak contribution

Appendix C: Land adjacent to Lymm Rugby Club: SA Objectives Appraisal

Land adjacent to Lymm Rugby Club, Lymm: SA Site Appraisal Framework

The appraisal utilising the following desk top data sources: Magic map; EA flood maps and ground water protection maps; Historic England list, Warrington Borough Council SA Scoping Reports (figure 3.6, 3.7, 3.9, 3.11).

A neutral effect option has been introduced into the assessment in order to realise the role that mitigation can play in the assessment process.

SA Objectives	Criteria	Likely Effect (Significant Positive / Positive / Neutral/ Negative / Significant Negative)	Comments
Economy and Regeneration			
Strengthen the local economy and ensure sustainable economic growth	EC1: Would site development lead to the loss of employment land?	Positive	The site is not allocated for employment use at present.
	EC2: Distance to Principal Road Network by vehicle	Significant Positive	The site is less than 1 mile from the principal road network.
Reduce poverty, deprivation and social exclusion and secure economic inclusion	EC3: How close is the site to key employment sites?	Positive	Significant employment opportunities within 1.2km – 3km from the site.
Health and Wellbeing			
Enable groups to contribute to decision making and encourage a sense of community identity and welfare.	HW2: Is the area supported by community facilities? (<i>Village halls, places of worship, community centre</i>)	Positive	Facilities in Lymm town centre are within 1200m.
Provide, protect or enhance leisure opportunities, recreation facilities, green infrastructure and access to the countryside.	HW3: Access to local natural green space (ANGST). To what extent do the sites meet the following ANGST standards? 1. Natural greenspace at least 2 hectares in size, no more than 300 metres from home. 2. At least one accessible 20 hectare greenspace site within two kilometre of home.	Positive	Standard met. Natural greenspace at Lymm Damm is adjacent to the site and easily accessible on foot.
	HW4: Access to formal play	Significant positive	Site will be capable of supporting the provision of onsite facilities.

SA Objectives	Criteria	Likely Effect (Significant Positive / Positive / Neutral/ Negative / Significant Negative)	Comments
Accessibility			
Reduce the need to travel, especially by car, improve choice and the use of more sustainable modes. Protect and enhance accessibility for all the essential services and facilities.	ACC1: How accessible is the site to the nearest primary school on foot?	Positive	Ravenbank Community Primary School is 1000 metres from the site.
	ACC2: How accessible is the site to the nearest secondary school?	Positive	Lymm High School is 1400 metres from the site.
	ACC3: How well served is the site by a bus service?	Significant positive	Regular bus services frequent the A56 which is less than 400 metres from the site.
	ACC4: How accessible is the site to the nearest train station?	Significant negative	Nearest train stations are over 5 km from the site however the accessibility of the site to local education facilities, bus services and services and facilities within Lymm town centre compensates for this likely effect.
	ACC5: What is the overall distance to a GP service or health centre?	Significant positive	The Brookfield Surgery is approximately 1100 metres from the site.
Ensure access to good quality, sustainable affordable housing.	HO1: To what extent will development help to meet housing needs? <i>Deliverability and scale</i>	Significant positive	Site is available for development within the next 5 years.
Natural Resources			
Ensure the sustainable and prudent use and management of natural resources including the promotion of natural resources including the promotion of sustainable drainage and water conservation. Protect, manage and improve local environmental quality including land, air and controlled waters and reduce the risk of flooding.	NR1: What are the potential impacts on air quality?	Positive	The development is more than 1km from the AQMA associated with the M6.
	NR2: Could development of the site lead to the remediation of land potentially affected by contamination?	Significant positive	Whilst residential use would comprise a sensitive end use. The site is not thought to be contaminated given the limited historic use of the site, any contaminants present on site could be successfully mitigated through a remediation scheme.
	NR3: Would allocation of the site result in the loss of High Quality Agricultural Land?	Positive	Site contains less than 10 hectares of agricultural land 1-3.
	NR4: Does the site fall within a Groundwater Source Protection Zone, as identified by the environment agency?	Neutral	Part of the site falls within the outer zone 2. Whilst the appraisal indicators state this to be a negative effect this is in fact neutral. Protection measures can be incorporated into the scheme design

SA Objectives	Criteria	Likely Effect (Significant Positive / Positive / Neutral/ Negative / Significant Negative)	Comments
			to control surface water runoff into the ground. PBA have experience of this type of mitigation in other schemes.
	NR5: Is the site (or part of) within an identified flood zone?	Positive	Site is within flood zone 1.
	RU3: Is there potential for safeguarded or identified mineral reserves to be sterilised?	Positive	No effects anticipated - the site is not known to be within an identified area.
Built and natural heritage			
Protect and enhance places and buildings of historic cultural and archaeological value.	BNH1: Proximity to designated heritage assets: <i>Conservation Areas</i> <i>Nationally listed buildings</i> <i>Scheduled Ancient Monuments</i> <i>Registered Park or Garden</i>	Neutral	There are two grade II listed buildings immediately north of the site: Rivington cottage and the Church of St Mary the Virgin. A qualitative assessment such as a heritage statement will be submitted with any planning application submitted for the site. Identification and consideration of heritage issues from the outset of the masterplanning process in tandem with early and effective consultation with statutory and non-statutory bodies will ensure that no material harm to designated heritage assets will arise from development of the site.
	BNH2: Effects upon the significance and setting of heritage assets / the historic environment	Neutral	Through a sensitive design and materplanning process which considers the impact on heritage assets from the outset it is considered that the historic environment is unlikely to change from its baseline position.
Protect and improve the quality and character of places, landscapes, townscapes, and wider countryside whilst maintaining and strengthening local distinctiveness and sense of place.	BNH4: Capacity of the landscape to accommodate development, while respecting its character	Positive	Medium capacity. To be confirmed through landscape character assessment.

SA Objectives	Criteria	Likely Effect (Significant Positive / Positive / Neutral/ Negative / Significant Negative)	Comments
Biodiversity and Geodiversity			
Protect and enhance biodiversity and geodiversity	BG1: Could allocation of the site have a potential impact on a European Site SSSI, SPA or SAC	Positive	Outside catchment areas.
	BG1: Could allocation of the site have a potential impact on a SSSI	Positive	Over 400 metres from a SSSI.
	BG2: Could allocation of the site have a potential adverse impact on designated Local Wildlife Sites, Local Nature Reserve, RIGs, Potential Wildlife Sites or any other site of wildlife or geodiversity value such as Ancient Woodland (including where BAP species have been recorded.	Neutral	Adjacent to a local wildlife site (Lymm Damm). Phase 1 Extended Habitat Survey will inform masterplanning process and process of mitigation / offsetting (where relevant).
	BG3: What is the potential impact on TPOs.	Positive	Higher quality trees will be retained where possible. Significant new tree planting would be included within the scheme design.
Climate change and resource use			
Minimise waste and maximise reuse, recovery and recycling	RU1: Would allocation of the site result in the use of previously developed land?	Neutral	Site is predominantly greenfield. The objectively assessed need for Warrington states that the release of greenfield land will be necessary in order for Warrington to deliver the levels of housing required.
	RU2: Is there good access to a Household Waste Recycling Centre (HWRC)?	Positive	Woolston Recycling Centre and Stockton Heath Recycling Centre are both less than 10km from the site.