

Mr. P. Martin



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"

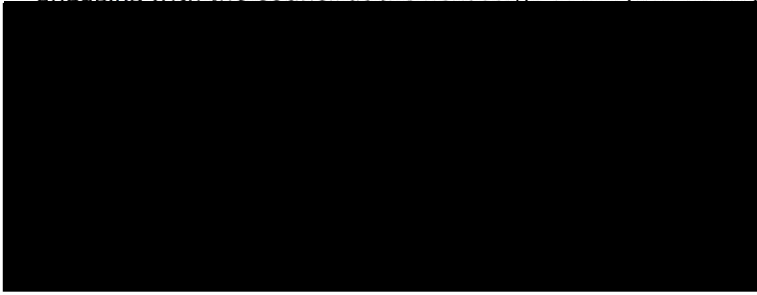
There is a clear justification for taking the whole settlement of Broomedge out of the Green Belt and defining a new boundary to provide for limited development over this and the next plan period.

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

