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**WARRINGTON**  
Borough Council

# **Warrington Borough Council**

## **Local Plan**

### ***Preferred Development Option***

### **Regulation 18 Consultation**

### **Standard Response Form**

**July 2017**

## 2: Questions

### Question 1

Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

### Response:

Please see attached Statement prepared by Nexus Planning.

## **Question 2**

**Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?**

## **Response:**

**Please see attached Statement prepared by Nexus Planning.**

### **Question 3**

**Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?**

### **Response:**

**Please see attached Statement prepared by Nexus Planning.**

## **Question 4**

**Do you agree with the new Local Plan Objectives?**

### **Response:**

**Richborough Estates have no specific comments to make in relation to this question at this stage.**

## **Question 5**

**Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?**

### **Response:**

**Richborough Estates have no specific comments to make in relation to this question at this stage.**

## **Question 6**

**Do you have any comments to make about how we've assessed different options for the main development locations?**

### **Response:**

**Please see attached Representations Statement prepared on behalf of Nexus Planning.**

## **Question 7**

**Do you agree with our Preferred Development Option for meeting Warrington's future development needs?**

### **Response:**

**Please see attached Representations Statement prepared on behalf of Nexus Planning.**

### **Question 8**

**Do you have any comments to make about our Preferred Development Option for the City Centre?**

### **Response:**

**Please see attached Representations Statement prepared on behalf of Nexus Planning.**

### **Question 9**

**Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?**

### **Response:**

**Please see attached Representations Statement prepared by Nexus Planning.**

## **Question 10**

**Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?**

### **Response:**

**Please see attached Representations Statement prepared on behalf of Nexus Planning.**

### **Question 11**

**Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?**

### **Response:**

**Please see attached representations statement prepared by Nexus Planning.**

## **Question 12**

**Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?**

### **Response:**

**Please see attached representations statement prepared by Nexus Planning.**

### **Question 13**

**Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?**

### **Response:**

**Please see attached Representations Statement prepared by Nexus Planning.**

## **Question 14**

**Do you agree with our approach to providing new employment land?**

### **Response:**

**Richborough Estates have no specific comments to make in relation to this question at this stage.**

## **Question 15**

**Do you agree with our suggested approach for dealing with Gypsy and Travellers and Travelling Showpeople sites?**

### **Response:**

**Richborough Estates have no specific comments to make in relation to this question at this stage.**

## **Question 16**

**Do you agree with our suggested approach for dealing with Minerals and Waste?**

### **Response:**

**Richborough Estates have no specific comments to make in relation to this question at this stage.**

## **Question 17**

**Having read the Preferred Development Option Document, is there anything else you feel we should include within the Local Plan?**

### **Response:**

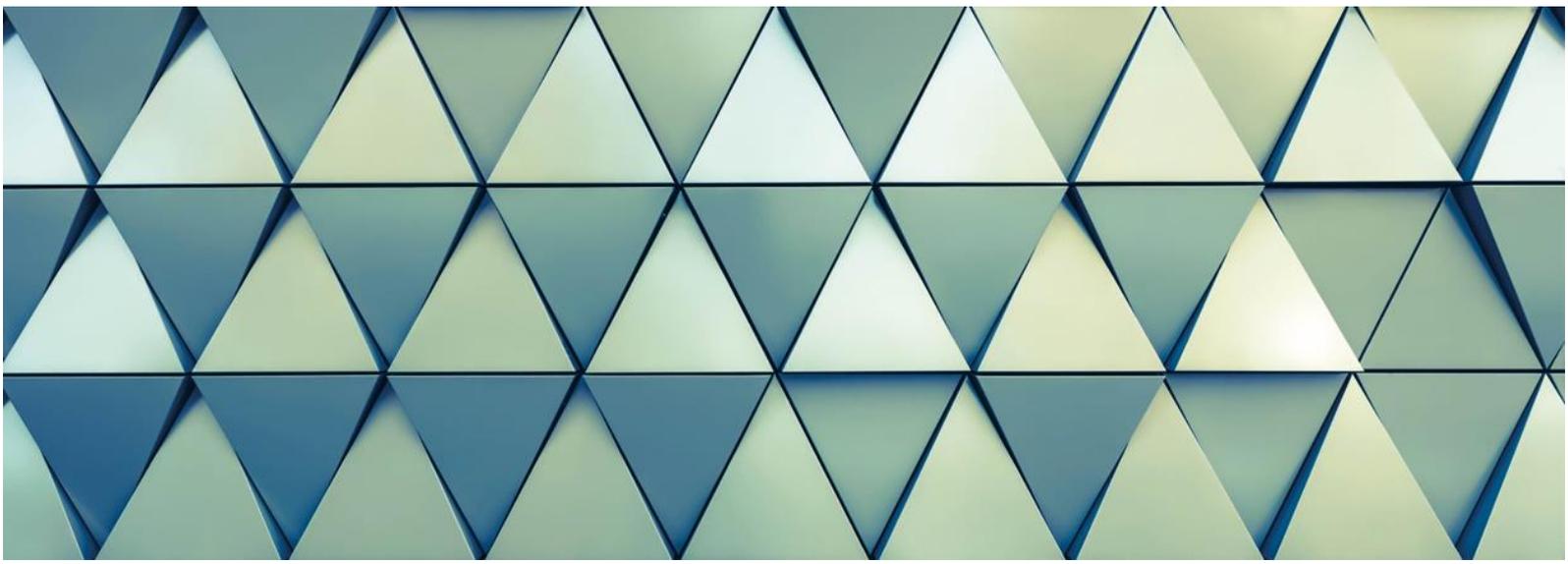
**Richborough Estates have no specific comments to make in relation to this question at this stage.**

# Warrington Local Plan Preferred Development Option Regulation 18 Consultation (July 2017)

## Representations

**on behalf of Richborough Estates**

September 2017



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Appendix B: Primary Care Analysis

Appendix C: Cherry Lane Farm, Lymm – Development Statement

Appendix D: Highways and Transportation Note

## 1.0 Introduction

- 1.1 We are pleased to submit, on behalf of our client Richborough Estates, representations in relation to the Warrington Borough Council Local Plan – Preferred Development Option Regulation 18 Consultation (July 2017).
- 1.2 Richborough Estates are promoting land off Cherry Lane in Lymm for residential development. The Development Statement now provided at Appendix C demonstrates how land off Cherry Lane represents an available, suitable, achievable and deliverable site for housing.
- 1.3 These representations relate to the Council's calculation of development needs and associated land requirements, and set out Richborough's views on the Council's preferred spatial strategy. Comments are also made on the following evidence base documents:
  - Green Belt Assessment – Additional Site Assessments (July 2017)
  - Settlement Profiles – Outlying Settlements (July 2017)
  - Area Profiles and Options Assessment – Technical Note (July 2017)
  - Strategic Housing Land Availability Assessment (SHLAA) (July 2017)

## 2.0 Representations to Preferred Development Option Consultation Document

2.1 We set out below Richborough Estate's comments on the Preferred Development Option Consultation Document (July 2017) in response to the questions posed in the Regulation 18 Standard Response Form.

***Question 1: Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?***

### Warrington Objectively Assessed Housing Need

2.2 The Preferred Development Option consultation document ("the PO consultation document") outlines (paragraph 2.8) that the objectively assessed needs for housing ("OAN") is 955 dwellings per annum ("dpa"). By reference to the Mid Mersey Strategic Housing Market Assessment Update – Warrington Addendum, May 2017 ("SHMA Update, May 2017") Table 33, the Council's purported OAN figure (955dpa) is based on the Economic Baseline Scenario. It is understood that the SHMA Update, May 2017 does not replace, but supplements the Mid Mersey Strategic Housing Market Assessment, 2016 ("SHMA 2016").

2.3 However the SHMA Update, May 2017 is clear (paragraph 6.27) that if the Council wishes to plan for higher employment growth to support the Devolution Deal then the provision of 1,113 dpa would be required. Specifically on this matter, the PO consultation document is expressly clear that the emerging Local Plan ("LP") strategy is to support and deliver the Devolution Deal. Indeed the PO consultation document states (paragraph 2.20) that the Local Enterprise Partnership ("LEP") and the Council are confident that level of growth proposed is achievable with the interventions set out the on Strategic Economic Plan ("SEP") and the scale of public and private sector investment the LEP is seeking to secure. The Council is therefore making the positive decision to plan for this level of growth.

2.4 By reference to spatial strategy set out within the PO consultation document (which aligns with the SEP and support the delivery of the Devolution Deal) and Table 33 of the SHMA Update, May 2017, it is demonstrably clear that the 955dpa figure does not represent OAN.

2.5 In accordance with the current National Planning Policy Framework ("NPPF"), namely paragraph's 19, 20, 158, and the National Planning Practice Guidance ("PPG"), namely ID: 2a-077 and ID: 2a-018, based

on the Council evidence base (SHMA Update, May 2017) the PO consultation document and future iterations of the LP should refer to an OAN figure of 1,113 dpa. After all, this is the preferred housing requirement figure underpinning the spatial strategy within the PO consultation document.

- 2.6 As highlighted within the PO document (paragraph 2.10) the Government is currently consulting on a revised methodology to assessing future housing requirement figures. In light of this, the evidence underpinning the emerging LP may require revising. Based on the current revised methodology consultation this is dependent on when the emerging LP is submitted to the Secretary of State for independent examination. At this point, given the revised methodology is only draft, it is therefore not considered possible to robustly confirm the extent to which 1,113dpa represents a sound 'housing figure for Warrington over the period 2017 to 2037, in accordance with NPPF paragraph 182.

#### Housing Backlog

- 2.7 Through the application of the Council's purported OAN (955 dpa), the PO consultation document outlines (paragraph 4.11-4.14) that the backlog from 2015 (the start date of the OAN period within the SHMA) is 847 dwellings. However, as referred above, the OAN underpinning the emerging LP spatial strategy is 1,113dpa. In light of this, we calculate that the backlog from 2015 is actually 1,163 dwellings – a backlog 316 dwellings higher than that set out within the PO document.

#### ***Question 2: Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?***

- 2.8 The PO consultation document identifies a total capacity of 15,429 homes from within the urban area. This equates to the vast majority (69%) of the total identified housing requirement for the Borough over the plan period. Richborough Estates have serious concerns with the assumptions that the Council are making in reaching this figure, and the content and quality of the evidence being relied upon.

#### Warrington City Centre and Waterfront Area

- 2.9 Richborough Estates support the Council's ambitions to regenerate Warrington City Centre. The number of dwellings which are identified as coming forward from this source is however, considered wholly unrealistic. Table 11 of the PO consultation document identifies 3,526 dwellings as capable of

coming forward from the City Centre, and 4,032 from the Waterfront Area. Taken together, the proposed strategy anticipates that 33% of the total housing requirement for the Borough (7,558 dwellings) will be delivered in the City Centre/ Waterfront Area. It is in the context of this heavy reliance on the City Centre to deliver housing that Richborough Estates raise the following significant concerns about the deliverability assumptions the Council have reached for these sites over the plan period. Aside from the physical and legal complexities of delivering these City Centre sites, Richborough fundamentally doubt that there is the market demand for the proposed number of dwellings (much of which will come forward in the form of apartments) in the town centre.

- 2.10 Having reviewed the *Urban Capacity Assessment Update (July 2017)*, the *Strategic Housing Land Availability Assessment (SHLAA 2015 and 2017 Update)*, and the *City Centre Masterplan* information for the City Centre, it is evident that the identified housing sites within the town centre will only come forward as part of a comprehensive regeneration of large parts of the existing heart of the City. The sites making up this source of the supply are complex. In most instances they have active uses, varied ownerships and face considerable physical constraints to their development. The majority will only be able to come forward for development in conjunction with adjacent sites, and many require significant infrastructure provision before they can be delivered.
- 2.11 Whilst we appreciate that considerably more information behind the City Centre proposals has been made available than at the time of the Local Plan '*Scoping Consultation*' in December 2016, the evidence still seems very limited and it is not clear on what basis the Council can have confidence certain sites are deliverable as envisaged. Of particular concern are apparent inconsistencies around likely phasing. Alongside the *Urban Capacity Assessment Update (July 2017)*, the Council are consulting on an *Overall Development Sites Phasing Plan ("Phasing Plan")* for the City Centre. However, no justification or explanation for this is provided, and in many instances the anticipated timescales appear to contradict the other available evidence. A number of the sites which are indicated for development in the short-term (0-5 years) on the *Phasing Plan* are, in contrast, considered in the *2017 SHLAA* to not be developable until the medium term (6-10 years), or even the long term (11 – 15 years).
- 2.12 By way of example, we consider the 'Southern Gateway' area. This is envisaged as a vibrant primarily residential area comprising around 900 dwellings. Five of the principle sites in this area (sites I1 – I5) are identified in the 2015/2017 SHLAA as two sites – references 2482 and 2677. The 2015 SHLAA identified that these sites were located within Flood Zone 2 and 3, faced issues with contaminated land, ownership/ tenancy issues and active uses. The SHLAA concluded that neither site was developable,

with no developer demonstrating interest or actively promoting the sites. To be included in the emerging Local Plan in the next 5 years, it is assumed that since the time of the 2015 SHLAA, the owners have expressed interest in developing the site for housing, albeit there is no information provided which explicitly confirms this. These sites are currently occupied by the Riverside Retail Park (which includes McDonald's, ScS Sofa Specialists, Pets at Home, B&M Home Store and Sports Direct) and an area of light industrial land around Wharf Street.

- 2.13 Typically, these types of occupiers demand/ commit to a long term lease and so the prospects of this site becoming available in the short term is highly unlikely. The accompanying Character Area Masterplan for the 'Southern Gateway' prepared by Aecom appears to show the whole of this area being redeveloped. In the absence of any other evidence to the contrary, there are no firm proposals in place for the delivery of the stated quantum of residential dwellings and Richborough therefore have serious reservations with the claim that 900 dwellings can be considered deliverable beyond any reasonable doubt.
- 2.14 Given the constraints identified within the Council's evidence base, and the fact the majority of the sites within the 'Southern Gateway' area continue to be in active use, Richborough question whether these sites will be deliverable within the short term, as identified.
- 2.15 The 'North East Development Quadrant' (comprising Bridge St. Quarter, Wharf St. Quarter, Cockhedge, St. Mary's Quarter, St. Elphin's Quarter and Thorneycroft) is envisaged as providing a variety of new leisure, civic, commercial and residential uses in the heart of the town centre. The Masterplan information anticipates it will deliver a total of 1,170 dwellings. This land currently includes the Cockhedge Shopping Centre, two major supermarkets and several other retail outlets which again are all shown as being redeveloped on the Character Area Masterplan prepared by Aecom. It is evident the redevelopment of this area will be a lengthy process, with multiple ownerships (there are 16 individually identified sites within St. Elphin's Quarter alone) and the presence of active uses add greatly to the complexities of delivering the Council's ambitions for residential development in the area.
- 2.16 Notwithstanding this, the *Phasing Plan* identifies the majority of sites within 'St Elphin's Quarter' (E1, E2, E3, E11 and E14) as being developable within 6 – 10 years. This is despite the 2017 SHLAA indicating these are unlikely to be developable until the longer term (11-15 years). The development of certain parcels are considered in the 2017 SHLAA to be developable only once emerging redevelopment plans

and proposals for the town centre are advanced. The *Phasing Plan* therefore once again contradicts the other evidence base documents.

2.17 Similar concerns regarding the robustness of the submitted evidence apply to the proposals for Warrington Waterfront. This area is identified as having a capacity to deliver 4,032 dwellings over the plan period. It faces a range of constraints, primarily flood risk and access. The deliverability of the Waterfront area is reliant on key infrastructure projects being completed to overcome existing constraints – namely the Warrington Western Link road which will connect the A56 to the A57. The link road must cross Sankey Brook, the St. Helen’s Canal, the Mersey, the railway line and the Manchester Ship Canal.

2.18 Table 18 of the PO consultation document suggests that 728 dwellings will be delivered in Years 0-5 and then 795 dwellings in Years 6-10. Associated with this table, paragraph 5.26 explicitly states that the *‘Waterfront development is dependent on the delivery of the ‘Western Link’ connection.’* Paragraph 5.27 then confirms:

*‘The final development site layout will need to be amended following confirmation of the preferred route of the Western Link. This may impact on the capacity for new homes and employment land identified above. Similarly the development trajectory will also be dependent on the final alignment and delivery of the Western Link connection. The final site layout, capacity and trajectory will all be reviewed ahead of the publication of the submission version of the Local Plan to ensure it reflects the preferred route and latest timetable for the Western Link programme.’*

2.19 It is clear at this stage that in the absence of any confirmation that the Western Link Road can actually be delivered, no certainty can be provided in respect of whether residential development at the Waterfront Area is feasible. Even if it is, the timing for delivery of the Western Link Road is unknown. The following factors confirm that even in the most optimistic of circumstances, no housing will be delivered during Years 0-10:

- Consultation is currently taking place in respect of potential route options;
- DfT funding has not yet been applied for to deliver the Link Road;
- Any CPO procedure is some way off commencing;

- Given the physical barriers the Link Road will need to overcome, this is a significant undertaking that will take several years to construct and complete.

2.20 The delivery of housing in this area is dependent on this complex project coming forward. On this basis, Richborough Estates are of the view that unless definitive confirmation can be provided that the Western Link Road is deliverable, the 4,023 dwellings anticipated to come forward in the Waterfront area cannot be relied upon to meet Warrington's future housing requirements and alternative sources must therefore be identified.

#### Wider Urban Area

2.21 Table 11 of the PO consultation document anticipates that 4,869 dwellings will be delivered from the 'Wider Urban Area' of Warrington. No breakdown of what this figure comprises is provided and it is not clear how it has been calculated. Our views on the delivery of dwellings within the Wider Urban Area is set out in answer to Question 9.

#### Summary

2.22 The above sets out Richborough's significant concerns with regards to the absence of robust evidence to justify the level of homes that are claimed will be deliverable within the Urban Area in the Plan Period. Given this source of supply amounts to the vast majority of the overall housing requirement (69%) these concerns are fundamental to the overall soundness of the emerging Local Plan strategy, with regard to the requirements of paragraph 182 of the NPPF.

#### ***Question 3: Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?***

2.23 Richborough agree with the Council that Exceptional Circumstances exist, in line with paragraph 83 of the NPPF, to justify the release of Green Belt in the Borough for development.

2.24 As set out in our answer to Question 2, it is contended that the Council's preferred strategy is entirely over-reliant on sites from within the existing urban area, and in Warrington City Centre. To ensure the new Local Plan is justified, effective and therefore 'sound' in accordance with paragraph 182 of the NPPF, a greater level of housing development needs to be directed elsewhere in the Borough –

necessitating the release of more Green Belt than is currently being proposed in the PO consultation document. This will help to ensure that sufficient flexibility is built into the Plan and that the revised Green Belt boundaries are capable of enduring beyond the Plan period.

- 2.25 Our response to Question 13 related to development in the Outlying Settlements further expands upon this concern as it relates to Lymm.

***Question 4: Do you agree with the new Local Plan Objectives?***

- 2.26 Richborough Estates have no specific comments to make in relation to this question at this stage.

**Question 5: Do you have any comments to make about how we've assess different 'Spatial Options' for Warrington's future development?**

- 2.27 Richborough Estates have no specific comments to make in relation to this question at this stage.

***Question 6: Do you have any comments to make about how we've assessed different options for the main development locations?***

- 2.28 Whilst Richborough broadly support the proposed strategy to direct development towards the Warrington Urban Area, it is considered that the current proposed distribution of development is weighted too heavily towards the urban area and the evidence base produced to support the strategy is unjustified. Accordingly, our client is disappointed that the *Area Profiles and Options Assessment Technical Note ("Area Profiles 2017")* does not fully consider an Option for 'main development locations' which considers a lower number of dwellings in the Urban Area and a greater dispersal to the outlying settlements. With reference to paragraph 2.3 of the *Area Profiles 2017*, this approach appears to have been ruled out as an option in principle which results in an inflexible consideration of all reasonable alternatives.
- 2.29 The apparent determination to maximise development towards the Urban Area raises concerns that rather than planning positively for the outlying settlements – ensuring a level of growth sufficient to deliver the required infrastructure - the outlying settlements are treated more as places to direct 'spill-over' requirement. In this way, the methodology for identifying the main growth locations risks is

missing the opportunity to support carefully considered, sustainable and plan-led growth in the outlying settlements and assist in the delivery of key infrastructure, as well as supporting existing facilities and services.

***Question 7: Do you agree with our Preferred Development Option for meeting Warrington's future development needs?***

- 2.30 Richborough broadly supports the principle of the Council's preferred spatial approach, which directs Green Belt release adjacent to the main urban area of Warrington with some development apportioned to the outlying settlements. Richborough are concerned however, with the proportion of the total requirement which is directed to the Urban Areas and contend that as currently proposed, the Preferred Option is anticipating an unrealistic amount of new homes to be delivered in the Urban Area. Not only does this raise doubts as to the effectiveness, flexibility and deliverability of the proposed strategy, but it also means that the outlying settlements do not receive the necessary level of housing growth needed and therefore investment in infrastructure delivery that a more balanced approach would deliver.
- 2.31 Paragraph 4.2.24 of the *Sustainability Appraisal* recognises that 'incremental' housing growth in the outlying settlements will support local services and widen local housing choice without comprising their character. An increased level of development in the outlying settlements would better help in the provision of affordable housing, and could support the viability of existing community facilities, such as increasing school capacity and GP provision, whilst presenting the opportunity to secure new and improved facilities. Richborough Estates welcome the recognition of this in the Council's evidence base (*Area Profiles 2017*) and support the location of development in the outlying settlements.
- 2.32 However, with specific reference to Lymm, Richborough are concerned that the level of housing growth currently ear-marked for Lymm will place additional pressure on village services and facilities without amounting to sufficient housing numbers to deliver new or enhanced infrastructure.
- 2.33 The evidence base documents recognise the need for additional primary school capacity and additional health services to support additional growth in Lymm. As set out in our response to Question 13, we demonstrate that the Council's preferred spatial strategy to allocate only 600 additional dwellings to Lymm, will not amount to the level of growth required to:
- a) Deliver existing affordable housing need, let alone rising need over the Plan period;

- b) Support the expansion of a 1FE primary school;
- c) Support and deliver a new GP practice.

2.34 Our analysis has demonstrated that to address these requirements, a housing figure of between 800 and 850 dwellings must be proposed at Lymm over the plan period.

2.35 Overall, Richborough contend that a more balanced approach to the distribution of development should be taken by directing a greater proportion of the housing requirement towards the outlying settlements, and specifically towards Lymm as the largest and most sustainable settlement outside of the main urban area of Warrington.

***Question 8: Do you have any comments to make about our Preferred Development Option for the City Centre? and Question 10: Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?***

2.36 Whilst Richborough support the aspirations to regenerate Warrington City Centre, as set out in our response to Question 2, it is contended that the preferred spatial strategy as currently proposed is wholly over-reliant on the city centre as a source of new housing. The sites identified are complex – often in multiple ownerships and contain active uses. Serious question marks therefore exist in relation to the likelihood of the stated quantum of housing to be delivered within the Plan period.

2.37 To expect as much as a third (33% as set out in Table 11 of the PO consultation document) of the overall housing requirement for the Borough to be delivered from the City Centre (including the Waterfront) appears highly unrealistic. Even putting aside the substantial physical and legal challenges of bringing these sites forward, there can be no confidence that market appetite exists to deliver the

stated quantum of housing in such close proximity, the majority of which will be in the form of apartments. The evidence base does not provide the necessary comfort to justify the current approach.

- 2.38 Directing a greater proportion of development to the outlying settlements, rather than the City Centre, would represent a more justified, effective and sustainable spatial strategy, in line with the requirements of the NPPF.

***Question 9: Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?***

- 2.39 Table 11 of the PO Consultation Document anticipates that 4,869 dwellings will be delivered from the 'Wider Urban Area' of Warrington. No breakdown of this figure is provided and it is not clear how it has been calculated. It is understood that the strategic site of Omega, to the north west of Warrington, and Peel Hall, to the north of the urban area, counts towards this source of supply.
- 2.40 In order to have confidence that the stated quantum development will come forward within the Plan Period, it is important that the Local Plan allocates a range of sizes and types of site, rather than relying on a small number of strategic sites. By their nature, large strategic sites require substantial supporting infrastructure to come forward in the form of new road networks, public transport connections, gas, water, electricity and telecoms connections and local facilities and amenities. Specifically, the PO consultation document (paragraph 5.22) identifies the need for major transport improvements and a new primary school at Peel Hall to ensure the site can be developed. At Omega, the proposals involve the creation of a new train station at West Warrington and upgrading of Junction 8 of the M62.
- 2.41 Given the substantial infrastructure required, the delivery of larger strategic sites is more challenging and subject to longer lead in times than when compared to smaller scale sites. Recent research by Lichfields<sup>1</sup> found that the average lead in time for sites over 1,500 dwellings from identification to planning approval is around 10 years, plus 1 – 2 years before the first dwelling is even delivered. The convoluted process for large-scale sites is exemplified by the application for a new mixed use neighbourhood at Peel Hall which was submitted in August 2016 (reference: 2016/28492). Despite being included within the 'urban capacity' figure for the purposes of the emerging Local Plan, the

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<sup>1</sup> *Start to Finish: How quickly do Large-Scale Housing Sites Deliver?* November 2016. (Nathaniel Lichfield & Partners)

Council refused the application in February 2017 on the grounds of lack of information regarding the impact on the local highway network and the lack of a Section 106 Agreement. An appeal was lodged against this refusal in July 2017. The appeal process for this site will likely take at least a further 6 months, pertinently demonstrating the lengthy delays typical of this scale of project.

- 2.42 Paragraph 14 of the NPPF states that Local Plans should be able to sufficiently adapt to rapid change. An over-reliance on these two strategic sites, which will inevitably have long lead-in times to delivery, fails to provide the necessary degree of flexibility to ensure that the plan is 'effective' and facilitates the level of housing delivery it needs to during the plan period.
- 2.43 A genuine range and quantum of sites should be distributed towards sustainable locations across the whole borough in order to provide confidence that the housing requirement can be considered deliverable over the plan period.

***Question 11: Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?***

- 2.44 Richborough Estates have no specific comments to make in relation to this question at this stage.

***Question 12: Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?***

- 2.45 Richborough Estates have no specific comments to make in relation to this question at this stage.

***Question 13: Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?***

- 2.46 The PO consultation document and the Area Profiles 2017, outlines that the Council's preferred spatial strategy approach is focusing Green Belt release adjacent to the main urban area of Warrington, with incremental growth in the outlying settlements, which include Lymm.

2.47 Whilst Richborough Estates accepts the principal of this spatial approach, we are concerned that the level of growth currently proposed to the outlying settlements within the PO document is insufficient, particularly at Lymm, to:

- (a) Rebalance the settlements aging population demographic by retaining within and attracting in, young newly forming households;
- (b) Deliver a full range of housing types and sizes, but with an emphasis on small to medium-sized family homes, and homes (including specialist accommodation) suitable for elderly residents;
- (c) Meaningfully respond to worsening sub-Borough housing affordability issues and affordable housing needs;
- (d) Support primary school expansion; and
- (e) Deliver much-needed primary care capacity (a new GP practice).

2.48 Our specific concerns regarding the level of housing growth proposed at Lymm are set out below:

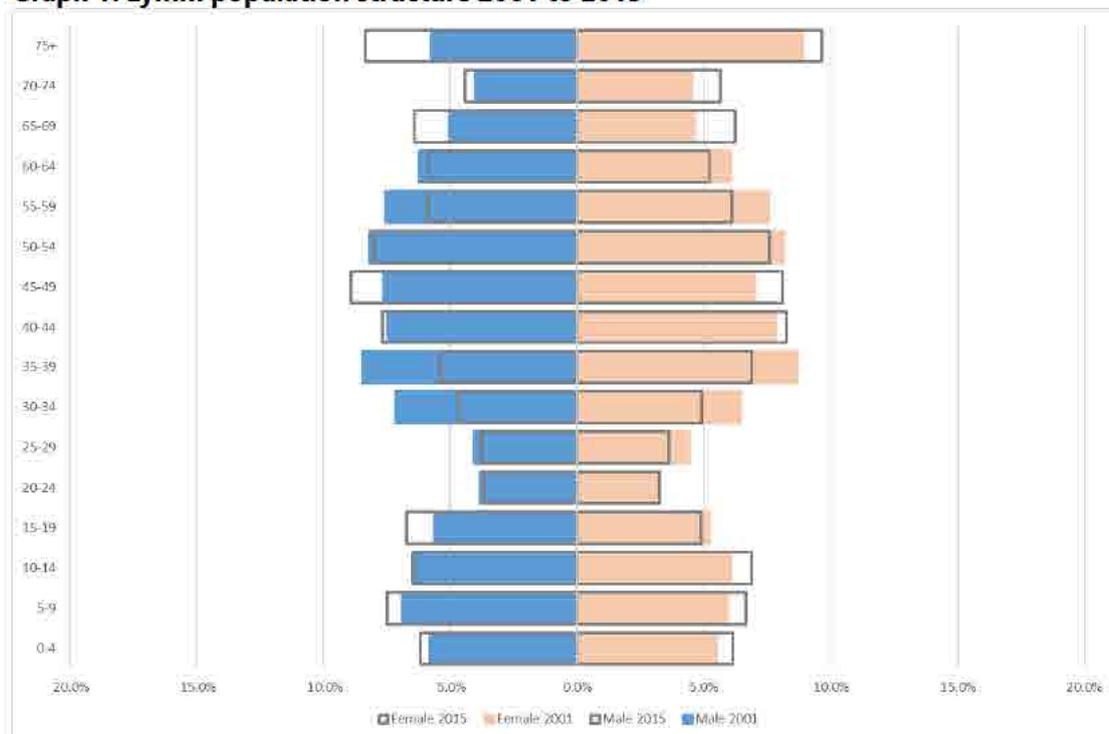
Demographic Change

2.49 The latest population estimate for Lymm (mid 2015) indicates that the ward area has a resident population of 12,884 persons. This representing approximately 6% of the Borough’s estimated resident population in mid-2015. As illustrated within Table 1 below, over the past 15 years Lymm ward population increased by approximately 2,332 persons (22% increase). It is noted that over this period the settlement population as a proportion of the Borough’s resident population remained broadly constant at approximately 6%.

<b>Table 1: Population change 2001 to 2015</b>			
<b>Area</b>	<b>Population 2001</b>	<b>Population 2015</b>	<b>Absolute Change</b>
<b>Lymm</b> (ward)	10,552	12,884	2,332

2.50 As illustrated within Graph 1 below, analysis of Lymm’s changing population structure over the past 15 years shows a shift towards an aging population, with a decreasing population aged 25 to 40 (predominantly the young family aged groups).

**Graph 1: Lymm population structure 2001 to 2015**

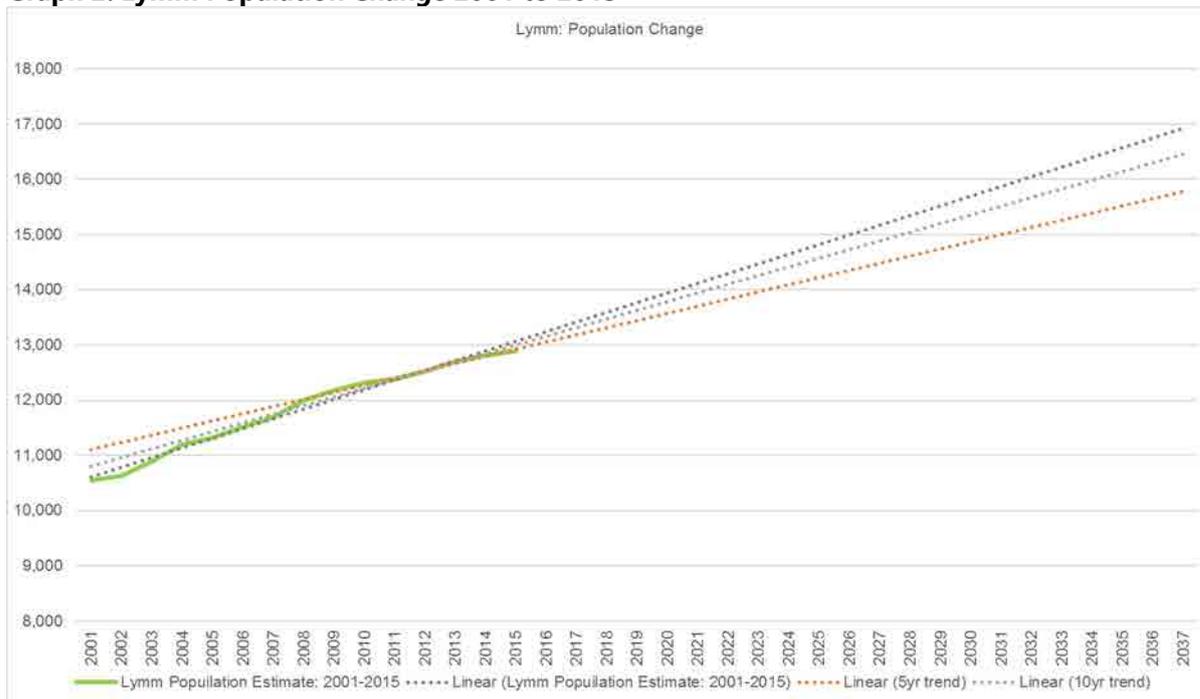


2.51 Table 2 below illustrates how within over the past 15 years Lymm ward has overtaken Culcheth ward has having the largest resident population of the Borough’s three principal settlement ward areas.

Table 2: Population change 2001 to 2015				
Ward	Population 2001	Population 2015	Absolute Change	Proportion of Borough Population (2015)
Burtonwood and Winwick	5,595	6446	851	2.9%
Culcheth, Glazebury and Croft	11,454	11,629	175	6.0%
<b>Lymm (ward)</b>	<b>10,552</b>	<b>12,884</b>	<b>2,332</b>	<b>6.2%</b>

2.52 Whilst over the past 15 years Lymm’s population has consistently increased, as illustrated within Graph 2 below, analysis of long and short-term population change trends suggests that the rate of population growth has been slowing and flattening off, particularly in the last 5-years. An aging population and a decline in young family age population, amongst other things, will be contribute towards slowing population growth.

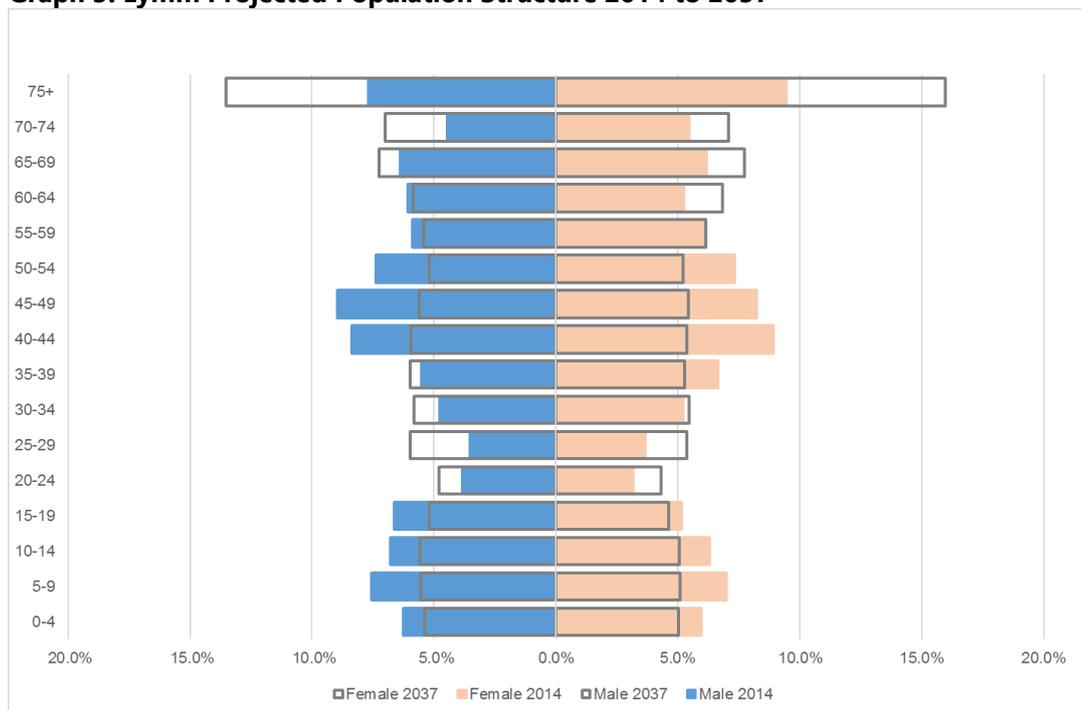
**Graph 2: Lymm Population Change 2001 to 2015**



2.53 Utilising ward level population estimates and Borough level trends in respect of fertility, mortality and migration, we have analysed the projected demographic based population change for Lymm over the period up to 2037 (the emerging Local Plan period) using the POPGROUP demographic model. Our sub-area demographic analysis for Lymm is constrained to the District level 2014-based population projections and the 2014 and 2015 mid-year population estimates.

2.54 As illustrated within Graph 3 below, analysis of Lymm’s projected population structure over the emerging Local Plan period suggests a further shift towards an aging population, and a declining middle aged population aged 40 to 54. There is also a notable decline in dependent children (aged 0 to 19).

**Graph 3: Lymm Projected Population Structure 2014 to 2037**



2.55 An issue associated with an aging population trend is that elderly residents have a tendency to occupying larger family sized dwellings, which acts as a barrier to younger households being able to stay within or move into the ward. Unchecked this can lead to a spiral of decline.

2.56 As set out in detail later in this section there is clear evidence of significant housing affordability issues within the Lymm ward. Overall, with a view to achieving mixed and balanced communities, as advocated within national policy, there is a need to rebalance the population structure of Lymm over the course of the period up to 2037.

2.57 The delivery of additional housing, with a focus on housing that enables newly forming family households to either stay within the ward or move into the ward will assist with this rebalancing. This will help ensure the longer-term vitality and viability of the settlement. To achieve this objective, the apportionment of the overall Borough housing figure to Lymm must take a 'policy-on' to avoid continuation of past demographic trends.

Housing Stock

2.58 Based on Census data (households and not dwellings) Table 3 below shows the housing stock (in 2011) by size (number of bedrooms) at the ward and Borough level. This analysis supports the overall SHMA

2016 conclusion (page 167) that the focus of new market housing within Lymm (and the Borough as a whole) will need to be on two- and three-bed properties for both newly forming young family households and to encourage older households to downsize.

<b>Table 3 Bedroom per household (2011)</b>			
<b>Bedrooms</b>	<b>Lymm ward</b>	<b>Warrington</b>	<b>Ward and Borough Difference</b>
1 bedroom	5.3%	9.1%	-3.8%
2 bedrooms	22.6%	23.7%	-1.1%
3 bedrooms	40.0%	47.0%	-7.0%
4+ bedrooms	32.2%	20.3%	11.9%

Source: Census Table QS411EW

2.59 Furthermore, it is noted that the SHMA 2016 highlights, from local market intelligence, that there is a 'severe shortage' of 3-bed semi-detached houses and bungalows within the Lymm ward housing market (paragraph 8.96). Aligning with the SHMA 2016 local intelligence, as illustrated within Table 4 below, Census data also suggests that the ward is characterised by a greater proportion of detached properties compared to the Borough average. The number of semi-detached and terraced properties is below the Borough average, supporting the SHMA 2016 conclusion that there is demand for 3-bed semi-detached houses and bungalows within the Lymm ward.

2.60 A shortage of 3-bed semi-detached housing stock will act as a barrier to newly forming younger age families within the Borough being able to live within the Lymm ward area. Similarly as highlighted within the SHMA 2016 (paragraph 8.96) the wards aging population would also be unable to easily downsize to smaller properties, including bungalows, within Lymm, which again prevents the existing larger housing stock being made available to young and other expanding families.

<b>Table 4: Dwelling Type (2011)</b>			
<b>Type</b>	<b>Lymm</b>	<b>Warrington</b>	<b>Ward and Borough Difference</b>
Detached	30.5%	24.0%	6.5%
Semi-detached	39.9%	41.3%	-1.4%
Terraced	19.0%	23.9%	-4.8%
Flat	10.6%	10.8%	-0.2%
Caravan or other mobile structure	0.0%	0.1%	0.0%

Source: Census 2011 Table QS402EW

2.61 As illustrated within Table 5 below, the ward has a greater proportion of privately owned dwellings than the Borough average and a lower proportion of social rented housing within the Borough. For all other tenures Lymm ward broadly aligns with the Borough average.

<b>Table 5: Housing Tenue (2011)</b>			
<b>Tenure</b>	<b>Lymm</b>	<b>Warrington</b>	<b>Ward and Borough Difference</b>
<b>Privately owned</b>	78.8%	71.5%	7.3%
<b>Shared ownership</b> (part owned and part rented)	0.9%	0.7%	0.1%
<b>Social rented</b>	7.5%	15.6%	-8.2%
<b>Private rented</b>	12.0%	11.2%	0.8%
<b>Living rent free</b>	0.8%	0.8%	0.0%

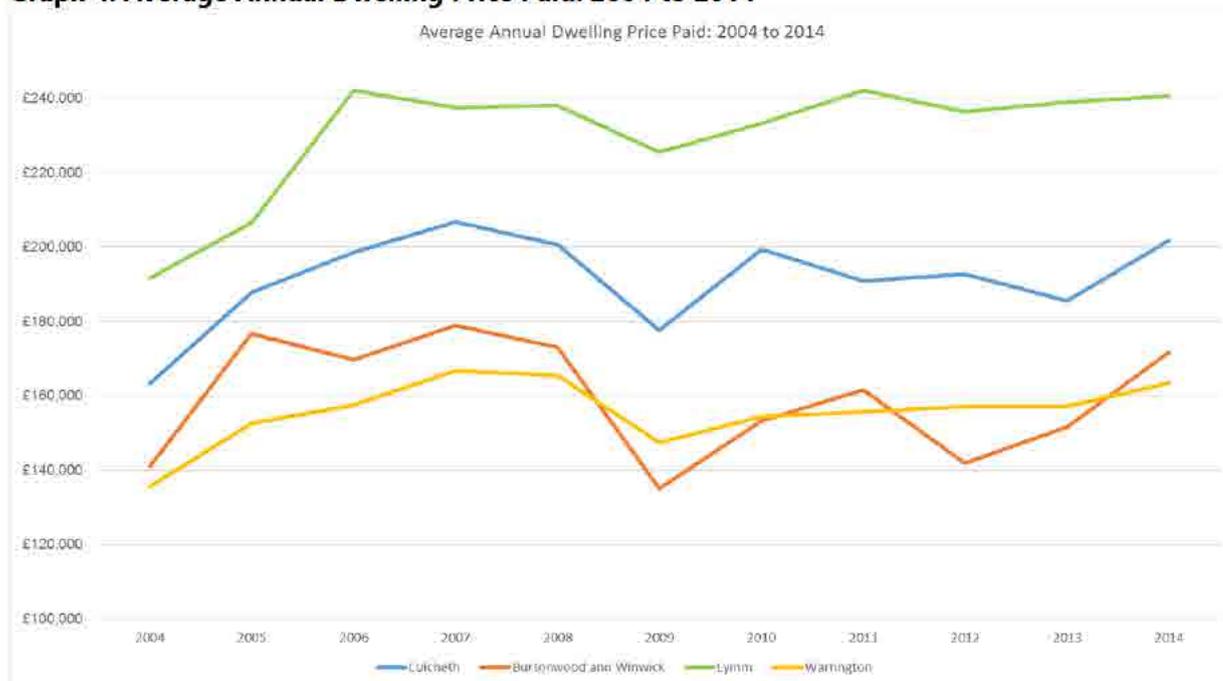
Source: Census 2011 Table QS405EW

Housing Affordability

2.62 It is noted that the SHMA 2016 concludes that there has been some increase in affordability pressures over the long term in the Housing Market Area although when benchmarked against the Regional and National picture the affordability pressures are not as severe.

2.63 As illustrated within Graph 4 and Table 6 below, our analysis of house sales trend data from the ONS House Price Statistics (based on Land Registry data) indicates that average house prices within the Lymm ward (in absolute levels and rates of change) over the past 10 years have been significantly higher than the Borough average and also the other two principal settlement ward areas.

**Graph 4: Average Annual Dwelling Price Paid: 2004 to 2014**



Source: ONS House Price Statistics for Small Areas Dataset 02a

Table 6: House Price Change 2004 to 2014				
Area	2004	2014	Absolute Change	Rate of Change (CAGR)
<b>Culcheth, Glazebury and Croft</b>	£163,246	£ 201,750	£38,504	2.4%
<b>Burtonwood and Winwick</b>	£140,863	£171,750	£30,888	2.2%
<b>Lymm</b>	£191,538	£240,669	£49,132	2.6%
<b>Warrington</b>	£135,663	£163,343	£27,680	2.1%

Source: ONS House Price Statistics for Small Areas Dataset 02a

2.64 As illustrated within Tables 7 and 8 analysis of Census 2001 and 2011 data demonstrates that at the Ward level the number of overcrowded and concealed households within Lymm ward (both in absolute terms and rate of change) has increased at a greater rate than the other principal outlying settlement ward areas. This further supports the conclusion that there are significant and worsening housing affordability issues associated with the Lymm ward area.

<b>Table 7: Overcrowded Households</b>				
<b>Ward</b>	<b>2001</b>	<b>2011</b>	<b>Absolute Change</b>	<b>Rate of Change (CAGR)</b>
<b>Burtonwood and Winwick</b>	50	46	-4	-0.9%
<b>Culcheth, Glazebury and Croft</b>	84	68	-16	-2.3%
<b>Lymm</b>	115	153	38	3.2%
<b>Warrington</b>	3,325	3,821	496	1.6%

Source: Census Tables UV59 and QS408EW

<b>Table 8: Concealed Households</b>				
<b>Area</b>	<b>2001</b>	<b>2011</b>	<b>Absolute Change</b>	<b>Rate of Change (CAGR)</b>
<b>Burtonwood and Winwick</b>	98	92	-6	-0.7%
<b>Culcheth, Glazebury and Croft</b>	153	175	22	1.5%
<b>Lymm</b>	128	174	46	3.5%
<b>Warrington</b>	3,125	3,907	782	2.5%

Source: Census Tables UV065 and QS113EW

- 2.65 As demonstrated above, while at the housing market area and Borough level it may be possible to conclude that on balance affordability is not sufficiently severe, the same cannot be concluded within the principal outlying settlement ward areas, in particular Lymm ward. In the context of the PPG (ID: 2a-020) it can therefore be reasonably concluded from available market signal evidence at the ward level that there are very significant housing affordability pressures within Lymm when compared to Warrington Borough and the other principal outlying settlements.
- 2.66 Indeed, it is noted that the local market intelligence within the SHMA 2016 (paragraph 8.96) highlights that Rightmove data suggests that this village [Lymm] has the highest median prices of all parts of Mid-Mersey (the housing market area). Furthermore, there is also evidence of significant existing affordable housing need within the Lymm ward area.
- 2.67 In addition to the need to rebalance the existing and projected population structure of the Lymm ward over the SHMA period to maintain Lymm as a vital and viable settlement, the apportionment of the Borough's overall housing figure must also lead to a shift in the balance of demand and supply such that affordability pressure might ease over time within Lymm. In the context of the very significant affordability pressures within Lymm there needs to be a large additional supply response over the SHMA period.

Affordable Housing Need

- 2.68 Overcrowded households provide a useful indication of households in need of affordable housing. Through the application of the intercensal rate of change (Table 7 above) it can be reasonably assumed that since the 2011 Census that the number of overcrowded households within the Lymm ward has increased to approximately 185 households by 2017/18. Through applying the Lymm ward dwelling vacancy rate of 3.2% (Census 2011), and the application of an appropriate vacancy / second home rate (3.2%) Lymm’s current affordable housing need in 2017/18 (the start date of the emerging LP) is circa. 191 affordable homes.
- 2.69 Based on the application of 25% affordable housing delivery through market led development, which appears to be the mid-point of the affordable housing delivery range concluded within the SHMA 2016 (paragraph 7.84), the housing requirement for Lymm to meet affordable housing need in full is approximately 764 dwellings (38 dpa):

<b>Table 9: Lymm Market and Affordable Housing Need</b>	
<b>Market and Affordable Need</b>	<b>Dwellings 2017-37 (dpa)</b>
Lymm Affordable Homes	191 (9)
Lymm Market Homes	573 (29)
Lymm Market and Affordable Homes	764 (38)

- 2.70 In light of the above, given the emerging LP spatial strategy is only proposing to deliver 600 market and affordable dwellings at Lymm over the period up to 2037, the spatial strategy will fail to deliver the settlements local affordable housing need. The emerging LP strategy will only deliver approximately 150 affordable homes at Lymm over the LP period (approximately 22% short of the level required).

Primary School Provision

- 2.71 By reference to the *Area Profiles 2017* for Lymm it is understood that the four existing primary schools at Lymm are either at capacity or are nearing capacity. Of existing schools, it is noted that Cherry Tree Primary School, currently a 1FE school, is the only school that has expansion potential.

- 2.72 Indeed, by reference to the Council's current Proposals Map there is approximately 1.87 ha. of urban green space land directly to the west of the school. This appears to support the Council's *Area Profiles 2017* conclusion that the school has 'good' expansion potential.
- 2.73 Based on the Department for Education ("DfE") Building Bulletin 103 guidelines for mainstream schools an additional 1FE school expansion would require between 0.9 and 1.1ha of land. A 1FE expansion of Cherry Tree Primary School on land adjoining the school is therefore feasible.
- 2.74 A 1FE primary school has the capacity for 210 children. However, as set out within Appendix A to these representations, our assessment of pupil yield arising from 600 new homes at Lymm would only generate an additional 141 pupils. Based on the level of proposed housing growth at Lymm a 1FE primary school expansion would have significant surplus capacity (broadly 33%). In light of the proposed level of growth at Lymm over the LP period, we therefore fundamentally question the viability of delivering additional primary school capacity. To viably support, an additional 1FE primary school expansion the level of planned housing growth must be in excess of 600 dwellings over the LP period.
- 2.75 Our analysis of pupil yields arising from new housing developments at Lymm (Appendix A) indicates that delivery of between 800 and 850 new homes at Lymm over the LP period would be the most appropriate level of growth to support a 1FE primary school expansion. Our analysis suggests that this level of housing growth would result in approximately 188 and 199 additional primary school places. A level that would result in between 89% and 95% capacity, maintaining sufficient primary school capacity headroom to accommodate any additional unplanned growth over the LP period.

#### Primary Care Capacity

- 2.76 NHS England provides guidelines for GP surgery space requirements based on a maximum capacity of 1,750 patients per GP and 120 sqm per GP. Based on the NHS Property Services guidelines a new GP practice requires between 500 sqm and 740 sqm (practices to therefore support between 4 and 6 GPs).
- 2.77 By reference to *Area Profiles 2017* for Lymm it is understood that both Bookfield Surgery and Lakeside Surgery are at capacity. Indeed, as set out within Appendix B the NHS Direct website suggests, based on the maximum capacity of 1,750 patients per GP, the existing GP practices within Lymm are already very significantly over subscribed (3,015 patients). However, to meet existing GP capacity shortfall, based on NHS England guidelines, only an additional 1.7 GP's would be required – a level which would

not viably support delivery of a new GP practice. Given the existing practices within Lymm are unable to expand there is currently no identifiable solution to address Lymm existing primary care shortfall.

- 2.78 As set out within our analysis within Appendix B, delivery of 600 additional dwellings within Lymm over the LP period in addition to the existing patient capacity shortfall (3,015 patients) would only support 2.5 new GP's – again a level insufficient to support the delivery of an new GP practice.
- 2.79 However, our analysis shows (Appendix B), that delivery of between 800 and 850 new homes at Lymm over the LP period, in addition to the existing patient capacity shortfall (3,015 patients), would support 3 full time GPs. Whilst it is accepted that 3 FTE GP's is below the NHS England guidelines for a new practice (500sqm – 4GP's) we consider that this level of housing growth (between 800 and 850 dwellings) would viably support and justify the delivery of a new GP practice.

#### Sub-District Housing Need: Lymm Conclusion

- 2.80 Of the Borough's principal outlying settlements, the Lymm ward area is the largest in terms of both population and households. In 2015, the ward area had a resident population of approximately 12,900 persons and 5,500 households. This representing broadly 6.2% of the Borough's population and households.
- 2.81 While historically the settlement areas population has consistently grown year-on-year the rate of growth over the past five years has begun to flatten. Our sub-Borough demographic analysis, which disaggregates the latest 2014-based official Office for National Statistics projection for Warrington, suggests that based on the continuation of past trends, over the course of the emerging Local Plan period (i.e. the period up to 2037) the settlement areas population growth is expected to broadly stagnate and potentially decline. If allowed to happen this would have detrimental implications on the future vitality of the settlement.
- 2.82 A contributing factor to the projected population stagnation is the continued trend towards an aging population structure. Over the period covered by the Local Plan the settlements population under the age of 60 is projected to decline.
- 2.83 Housing stock analysis and local market intelligence within the SHMA highlights there is a severe shortage of small and medium family sized homes, which is a barrier to elderly residents downsizing and freeing up larger family sized properties and also retaining and attracting newly forming younger households within the Lymm area.

- 2.84 At the Borough level the SHMA may suggest that on balance housing affordability and market signals are not sufficiently severe, but available evidence at the ward level demonstrates the same cannot be concluded within the Borough's principal outlying settlements, in particular the Lymm ward area. Our analysis and local market intelligence within the SHMA, concludes there are significant housing affordability and existing affordable housing needs within the Lymm area. In light of this, apportionment of the overall Borough's housing requirement must include a large additional supply response over the Local Plan period to lead to a shift in the balance of demand and supply and to help address affordable housing need.
- 2.85 Given the above, the apportionment of the overarching local plan housing figure to Lymm must be sufficient to:
- (a) Reverse the settlements projected population stagnation and potential decline by retaining within and attracting in, young newly forming households;
  - (b) Deliver a full range of housing types and sizes, but with an emphasis on small to medium-sized family homes, and homes (including specialist accommodation) suitable for elderly residents; and
  - (c) Meaningfully respond to worsening sub-Borough housing affordability issues and affordable housing needs.
- 2.86 The Councils' preferred spatial strategy appears to propose delivery of only 600 additional dwellings at Lymm over the LP period – an annual change of 0.57%, compared to the District rate of 1.1% per annum. Whilst the figure of 600 dwellings is a welcomed contribution towards addressing matters (a) to (c) above, our analysis has shown that this level of additional housing growth is insufficient to:
- (d) Delivery existing affordable housing need, let alone arising need over the LP period;
  - (e) Support the expansion of a 1FE primary school
  - (f) Support and deliver a new GP practice.
- 2.87 The PO consultation document and the supporting evidence base are clear that there are existing primary school and primary health care capacity issues within Lymm. Indeed our analysis suggests that the existing GP practices are oversubscribed against NHS England guidelines by 3,015 patients – equivalent to 1.7 full time GPs.

2.88 Overall, our analysis demonstrates that to address (a) to (f) above, a housing figure of between 800 and 850 dwellings must be proposed at Lymm over the LP period. This still only represents an annual dwelling change of between 0.75 and 0.79%, compared to the District rate of 1.1% per annum. This level of housing growth would address and deliver (d) to (f) above.

**Questions 14 to 17**

2.89 Richborough Estates have no specific comments to make in relation to these questions at this stage.

### 3.0 Assessment of Evidence Base

#### Green Belt Assessment (October 2016) and Green Belt Assessment Addendum (June 2017)

- 3.1 We have previously (in our representations to the December 2016 “Scoping Consultation”) raised significant concerns that the conclusions reached in the Green Belt Assessment (GBA, October 2016) by Arup appear fundamentally unjustified and inconsistent with regards to the Green Belt around Lymm.
- 3.2 Having reviewed the *Green Belt Assessment – Addendum (June 2017) and Additional Site Assessments (July 2017)*, our concerns still stand. For completeness, we re-iterate our concerns here. We also set out Richborough’s views that the revised conclusions reached by the *Additional Site Assessments (July 2017)* in relation to other sites in Lymm amount to further inconsistencies.

#### General Areas of Assessment

- 3.3 The GBA (2016) identifies three ‘General Areas’ (GA’s) of Green Belt around Lymm – GA 6 to the north of the settlement, GA 7 to the east and GA 8 to the south.

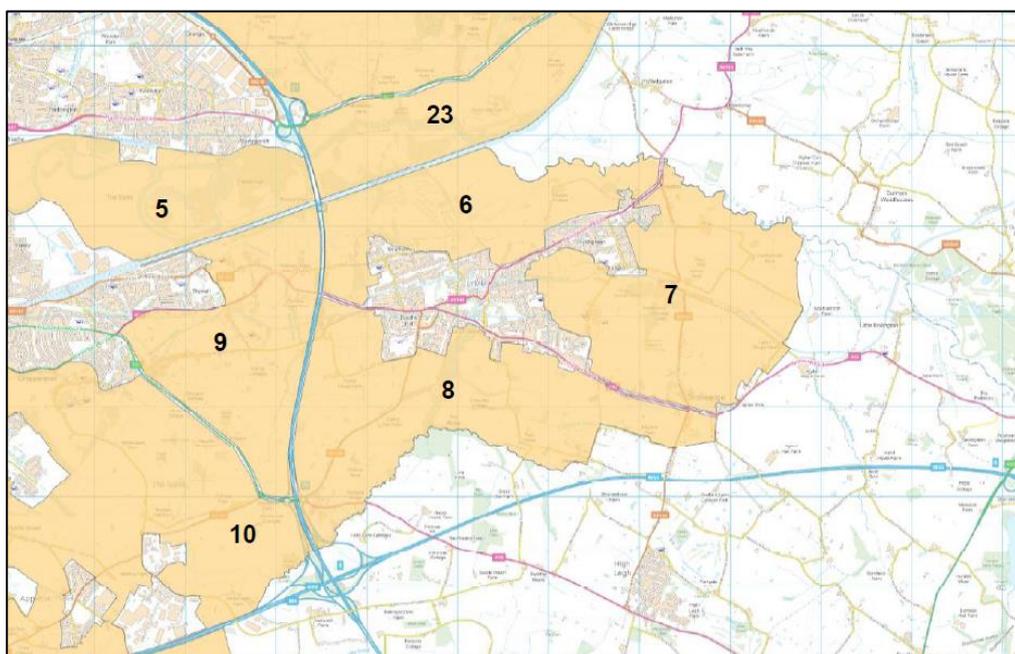


Figure 1: Extract from GBA - General Areas around Lymm

3.4 In the GBA, these three areas are assessed against the five purposes of Green Belt as follows:

	<b>Purpose 1: To check unrestricted sprawl of large built-up areas</b>	<b>Purpose 2: To prevent neighbouring towns merging into one another</b>	<b>Purpose 3: To assist in safeguarding the countryside from encroachment</b>	<b>Purpose 4: To preserve the setting and special character of historic towns</b>	<b>Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</b>	<b>Overall Assessment</b>
GA 6	No Contribution	Moderate Contribution	Strong Contribution	Moderate Contribution	Moderate Contribution	<b>Moderate Contribution</b>
GA 7	No Contribution	No Contribution	Strong Contribution	No Contribution	Moderate Contribution	<b>Moderate Contribution</b>
GA 8	No Contribution	Moderate Contribution	Strong Contribution	Strong Contribution	Moderate Contribution	<b>Strong Contribution</b>

3.5 GA 6 is therefore assessed as having a ‘moderate’ contribution to Purpose 2 (preventing towns merging). In considering this purpose however, the GBA (Appendix E) states that GA 6:

*“...forms a largely essential gap between the Warrington urban area and Lymm whereby development of the GA would reduce the gap between the towns but would not result in them merging. Furthermore, the M6 ensures that the separation is retained. Overall, the GA makes a **weak** contribution to preventing towns from merging.” [our emphasis]*

3.6 It appears therefore that GA 6 has been assessed as having a ‘moderate’ contribution in error.

3.7 This is supported by the text under ‘Justification for Assessment’ for GA 6 which goes on to summarise that;

*“The GA makes a strong contribution to one purpose... [purpose 3 as indicated]..., a moderate contribution to two...[purpose 4 and 5 as indicated]..., **a weak contribution to one** and no contribution to each other...[purpose 1 as indicated].” [our emphasis and brackets]*

3.8 It seems reasonable to infer that the ‘weak’ contribution described relates to purpose 2 which has accordingly been indicated to have a ‘moderate’ contribution by mistake.

3.9 Assuming this is indeed a mistake, it is considered that GA 8 (to the south of Lymm) must also be assessed as making a ‘weak’ contribution to Purpose 2 given the assessment made in relation to GA 8 is almost identical to the word as the assessment for GA 6. The assessment of the contribution of GA 8 to Purpose 2 is as follows:

*“The GA forms a largely essential gap between the Warrington Urban Area and Lymm whereby development would significantly reduce the actual distance between the towns without resulting in them merging. The M6 ensures that the separation is retained. Overall, the GA makes a moderate contribution to preventing towns from merging.”*

- 3.10 It would be wholly inconsistent for the GBA to be contending that GA 8 has a greater contribution towards preventing merging with Warrington than GA 6 given the similarity of the two General Areas in terms of proximity to Warrington and separation from it by the M6. The General Areas are the same distance from the closest part of Warrington to the west. GA 6 is approximately 1.5 km away from Warrington to the north east whereas GA 8 is around 3.5 km away to the south west and therefore arguably has less of a role in preventing merging.
- 3.11 **Given the above analysis, it is considered that the GBA should be amended to correct this apparent error and assess both GA 6 and GA 8 as making a ‘weak’ contribution towards Purpose 2.**
- 3.12 Amending this flaw is important as it would reveal that GA 8 is only assessed as having a greater contribution (ie. a ‘strong’ contribution) than GA 6 in relation to Purpose 4 (preserving historic towns). In summarising the assessment of GA 8, the GBA acknowledges that this assessment of ‘strong’ contribution against Purpose 4 *‘is not significant enough to mean that the GA makes a strong overall contribution’*.
- 3.13 Considering the above points, it is inaccurate and unjustified to assess GA 8 as having an overall ‘strong’ contribution to the purposes of the Green Belt or certainly to imply it makes a more important contribution than the other two GA’s in Lymm. The identified flaws and inconsistencies in Appendix E of the GBA are especially concerning when it leads the GBA to identify GA 8 as one of the top 5 most important of the total 25 ‘General Areas’ assessed in the whole Borough in terms of contributing to the purposes of the Green Belt (paragraph 147, GBA).
- 3.14 In summary, the logic and conclusions drawn about the three GA parcels around Lymm are considered to be fundamentally flawed in the following key ways:
- The assessment of GA 6 as having a ‘moderate’ contribution to purpose 2 appears to be an error with the intention of the author to in fact conclude a ‘weak’ contribution;

- Whether 'moderate' or 'weak', it would be inconsistent and unjustified for the GBA to conclude GA 8 has a greater contribution towards purpose 2 than GA 6 considering GA 6 is actually closer to Warrington;
- Given both GA 6 and GA 8 can only reasonably be assessed as having the same level of contribution to Purpose 2, the only purpose against which these two GA's differ is Purpose 4 (contribution to historic towns). The GBA however, acknowledges that the assessment of GA 8 as having a 'strong' contribution to Purpose 4 is not sufficient to warrant an overall conclusion of 'strong' contribution to purposes of the Green Belt. Accordingly, it is submitted that the overall assessment of GA 8 should be re-visited.

Assessment of Parcels

3.15 The GBA (2016) then goes on to assess parcels within these General Areas. Our client's land at Cherry Lane Farm is identified as a discrete parcel – Parcel LY25 as identified on the extract below:

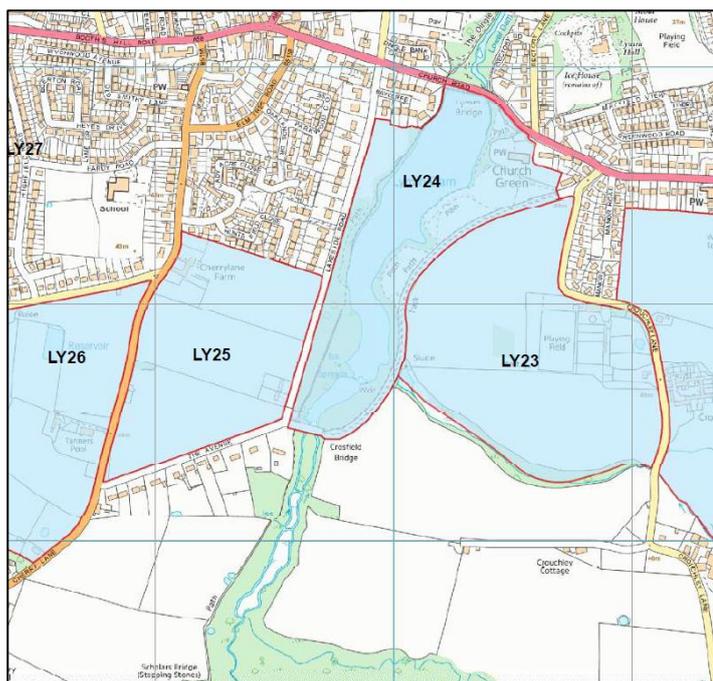


Figure 2: Extract from GBA - Parcel LY25 (land at Cherry Lane Farm)

3.16 Parcel LY25 is assessed as making the following contribution to the purposes of the Green Belt in Appendix G:

3.17 **Table 2: Assessment against Purpose 3 – safeguarding the countryside from encroachment**

	<b>Purpose 1: To check unrestricted sprawl of large built-up areas</b>	<b>Purpose 2: To prevent neighbouring towns merging into one another</b>	<b>Purpose 3: To assist in safeguarding the countryside from encroachment</b>	<b>Purpose 4: To preserve the setting and special character of historic towns</b>	<b>Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</b>	<b>Overall Assessment</b>
<b>LY25</b>	<i>No Contribution</i>	<i>No Contribution</i>	<i>Strong Contribution</i>	<i>Strong Contribution</i>	<i>Moderate Contribution</i>	<b><i>Strong Contribution</i></b>

3.32 Following the Call for Sites Regulation 18 exercise in December 2016, the *GBA – Additional Site Assessments* has made extremely minor updates (under site reference: R18/101 and R18/051) to the conclusions reached about Parcel LY25 by the October 2016 Original Assessment. The overall conclusions reached about the contribution of the parcel are the same.

3.33 We now set out Richborough’s significant concerns relating to the assessment of this parcel.

**Assessment against Purpose 3 – safeguarding the countryside from encroachment**

3.34 Having reviewed the methodology set out in Section 4 of the GBA, and the conclusions reached in respect of other parcels in Lymm, the assessment of Parcel LY25 as having a ‘strong’ contribution against Purpose 3 (safeguarding from encroachment) seems unjustified and inconsistent.

3.35 The GBA states that “*the parcel is well connected to the countryside along three sides*” but offers no reasoning for this conclusion. This is particularly unclear when in the next sentence the assessment recognises that “*the Avenue, Cherry Lane and Lakeside Road form durable boundaries which would be able to prevent further encroachment beyond the parcel if the parcel was developed*”.

3.36 With regard to the methodology set out in Section 4, we consider that in fact Parcel LY25 cannot be assessed as making a strong contribution to safeguarding the countryside from encroachment. A

summary of the assessment criteria set out in the GBA methodology, and our critique of the assessment undertaken against each criteria is provided below:

**Table 3: Critique of Assessment of Parcel LY25 (or R18/101 and R18/051) against Purpose 3**

Key Questions to Consider	Critique of Assessment
<p><i>Future encroachment: Are there existing durable boundaries which would contain any future development and prevent development and prevent encroachment in the long term?</i></p>	<p>In the <i>July 2017 Additional Site Assessments</i>, the GBA considers the existing residential properties along the northern boundary of the Parcel do not constitute a 'durable' boundary and would not be able to prevent encroachment into the parcel. We would question the assessment of this boundary as 'not durable' given the borders of these properties form a continuous, solid line along this boundary which is well defined by a 15 metre buffer of mature landscaping.</p> <p>In terms of preventing future encroachment if Parcel LY25 were developed, the GBA acknowledges the existence of durable boundaries around the remaining three sides of the parcel in the form of Cherry Lane, The Avenue and Lakeside Road. We note that the permanence of these boundaries is further reinforced by the existence of Lymm Dam and the surrounding protected woodland immediately to the east of the parcel and the row of dwellings on the south side of The Avenue which further contain the parcel to the south.</p> <p>Overall, it is clear the site represents a well contained parcel of land which is clearly defined by strong, defensible boundaries on all sides which would contain encroachment in the long term if the parcel were developed.</p>
<p><i>Existing encroachment: What is the existing land use/ uses? Is there any existing built form within or adjacent to the parcel?</i></p>	<p>The GBA correctly identifies that the Parcel currently comprises agricultural land with limited built development.</p> <p>However, the methodology also requires consideration of existing built form adjacent to the parcel. It is therefore an important consideration that the entire northern and southern boundaries of the parcel are directly adjacent to existing residential properties. The GBA seems to conclude that the presence of the dwellings along the southern boundary (along The Avenue) mean the parcel plays a <i>more</i> important role in preventing encroachment. However, this is illogical when these properties in fact contain the southern boundary of the site and prevent any future encroachment should the parcel be developed. They also limit any sense of openness.</p>

	<p>The existing residential properties of Tanners Pool to the west of Cherry Lane in the southern area of the site, and the two existing properties within the south-eastern part of the site also interrupts the feeling of open countryside surrounding the site.</p>
<p><i>Connection to the countryside: Is the parcel well connected to the countryside? Does the parcel protect the openness of the countryside?</i></p>	<p>As described above, the site is surrounded by man-made defensible boundaries on all sides - existing development to the north, Cherry Lane to the west, The Avenue to the south and Lakeside Road to the east. It is well related to the existing built-up area to the north and north west, a continuous line of development to the south and scattered existing properties to the east fronting Cherry Lane and west fronting Lakeside Road.</p> <p>We therefore dispute the assertion in the GBA that the site is “<i>well connected to the countryside along three sides</i>” and question the logic for this. There is in fact extremely limited connectivity between the site and the wider countryside both to the east (by virtue of Lymm Dam and the surrounding dense woodland) and to the south (by the existing properties along The Avenue). Whilst there are some views of the parcel from the agricultural land to the west, the parcel is physically and functionally severed from the wider countryside by Cherry Lane which is a well-used main road being the only route for traffic between Lymm and the M6/M56.</p> <p>For the above reasons, we contend that Parcel LY25 should not be assessed as being well connected to the countryside. Aside from the immediate impact from the loss of the fields (a degree of which will be inevitable to meet Warrington’s needs), its development would not harm the openness of wider green belt in the area given the limited inter-visibility between the countryside and the parcel and the existing urban influences on all sides.</p>
<p><i>Does the parcel serve a beneficial use of the Green Belt (NPPF para 81) which should be safeguarded?</i></p>	<p>The Parcel does not serve a beneficial use of the Green Belt.</p>

3.53 The GBA judges Parcel LY25 as having a ‘strong’ contribution towards Purpose 3. However, with regard to the points set out above, our client considers that this is a flawed analysis. It is also inconsistent when considering the assessments undertaken in relation to other sites in Lymm as shown on the extract of the GBA below:

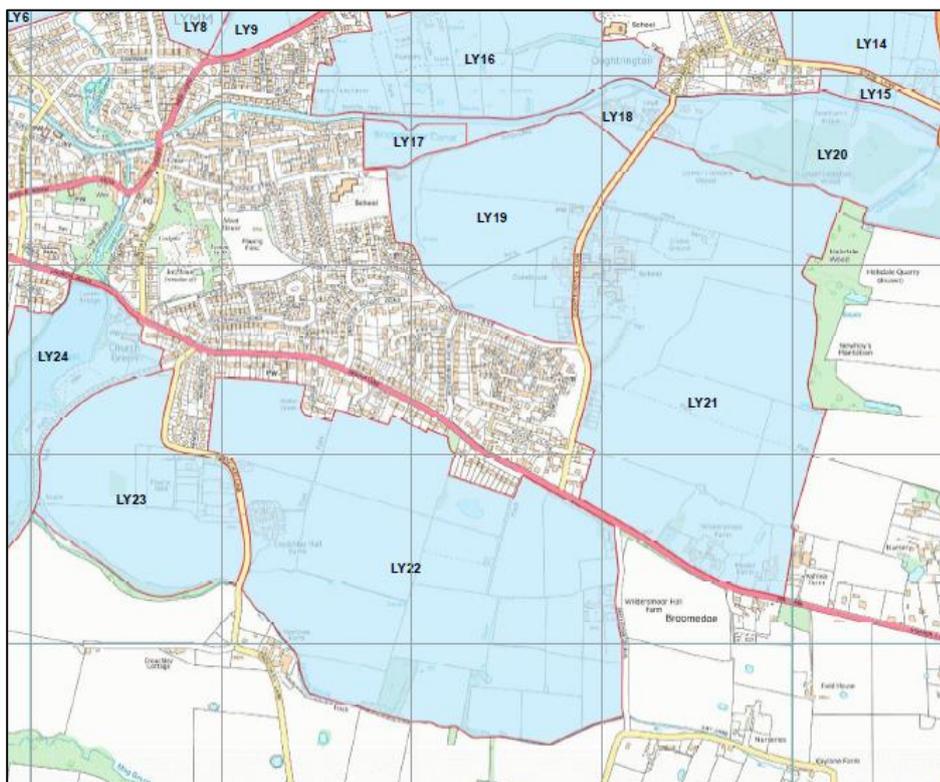


Figure 3: Extract of GBA showing Parcels LY23, LY16 and LY21

3.54 For example, parcel LY23 comprising land on the eastern side of Lymm Dam, partly occupied by the football club, is judged to make a ‘moderate’ contribution towards purpose 3 despite the following analysis which could just as easily apply to Parcel LY25:

*“The parcel supports long line views...and overall supports a strong degree of openness. The parcel could be argued to make strong contribution due to its openness, but the durability of its boundaries means that overall it makes a moderate contribution to safeguarding from encroachment.”*

3.55 The overall judgement that Parcel LY23 makes only a ‘moderate’ contribution to purpose 3 is even more inconsistent when it is considered this parcel also supports a beneficial use in the Green Belt. The Lymm Rugby/ Football/ Squash Club has an important recreational and social function in the

community and in accordance with the GBA methodology, Parcel LY23 should be judged as having a greater contribution to purpose 3 due to this use.

3.56 In the *Green Belt Assessment – Additional Site Assessments (July 2017)*, the assessment of Parcel LY16 has been amended with the contribution towards Purpose 3 changing from a ‘strong’ contribution to a ‘weak’ contribution. The *Additional Site Assessments (July 2017)* document justifies this by stating that ‘purpose 3 should be changed to moderate as the parcel is more connected to the settlement than the countryside’. Richborough appreciate that Parcel LY16 is well-related to the existing settlement. However, it is considered no better connected with the settlement than Parcel LY25, which is adjacent to existing residential development on two sides. In fact, Parcel LY16 could be considered more open to the adjacent open countryside since one of its longest boundaries (the southern boundary) is formed by the canal which whilst forming a durable boundary, represents a rural feature which offers limited screening of the site. This is in contrast to Parcel LY25 which is severed from the adjacent countryside by the B5158 to the west and the row of substantial residential properties along The Avenue, which form the southern boundary to the parcel. Whilst we appreciate there must always be an element of professional judgement in assessing the parcels, it is inconsistent and fundamentally flawed that Parcels LY16 and LY25 can be judged to make such differing degrees of contribution towards Purpose 3.

3.57 Even more contradictory is the assessment of Parcel LY21. This Parcel lies adjacent to the east of Lymm and comprises almost entirely agricultural land. The majority of the northern and eastern boundaries of Parcel LY21 lie immediately adjacent to the open countryside and along the eastern boundary are formed by non-durable, field boundaries and woodland. The southern boundary is formed by the A56 but immediately to the south of this is open countryside. Accordingly, Richborough agreed with the GBA (2016) conclusion that Parcel LY21 makes a ‘strong’ contribution to Purpose 3 and an overall ‘strong’ contribution in recognition of the ‘non-durable boundaries between the parcel and the open countryside.’

3.58 There is considered to be no justification whatsoever for the *Additional Site Assessment (July 2017)* to now revise this assessment of Parcel LY21 to conclude an overall ‘moderate’ contribution when considered in the context of the conclusions reached in respect of Parcel LY25. The *Additional Site Assessment (July 2017)* states that ‘the overall assessment has changed to moderate as a result of the strong-moderate degree of openness and predominantly durable boundaries.’ However, as already established the parcel has non-durable boundaries. The *Additional Site Assessment (July 2017)* describes how there was a typo in the Original Assessment that states the western boundary is

connected with the countryside rather than the eastern, but it was evident from the rest of the description in the GBA that the western boundary is adjacent to the settlement such that this cannot be argued to have led to a fundamentally different judgement.

3.59 The downgrading of the degree of openness seems to be based purely on the discovery that the previously described 'active farms' on the site are in fact converted to residential dwellings. Given these buildings were previously there when the 2016 GBA conclusions were drawn, it is illogical to now suggest *'these residential uses increase the levels of built form within the parcel'* in a manner than limits the degree of openness more than previously assessed. Parcel LY25 has similar scattered residential development in the north west and eastern parts of the site but yet the GBA still describes the Parcel as having a strong degree of openness.

3.60 With reference to these examples, Richborough consider the GBA and subsequent Addendums to follow an unjustified and inconsistent approach with respect to the assessment of the parcels, and contend that this brings the credibility and value of this evidence base document into significant doubt.

**Assessment against Purpose 4 – To preserve the setting and special character of Historic Towns**

3.61 Parcel LY25 is also assessed as making a 'strong' contribution towards Purpose 4 of the Green Belt. We understand from a review of the methodology that this assessment is given on that basis that the site lies adjacent to the Lymm Conservation Area to the east, and within the 250 metre buffer from the Conservation Area.

3.62 We appreciate that it is not within the scope of the Green Belt Assessment to undertake a more sophisticated assessment of the potential impact of development on heritage assets within the Borough. However, we take this opportunity to note that whilst Parcel LY25 is adjacent to the Lymm Conservation Area, there is limited inter-visibility between this heritage asset and the parcel given the dense woodland which surrounds the Dam and would screen the fields at Cherry Lane Farm from the majority of public vantage points in the Conservation Area.

3.63 As such, the site in fact makes little contribution towards the wider setting of the Conservation Area. Any proposals for residential development on the site would be designed to respect the character of the Conservation Area, through areas of open space and new landscape buffers in the eastern part of the site. In light of the limited views of the site from the Conservation Area, it is considered the

development of the site would not result in adverse impact on the setting or significance of this heritage asset or the historic significance of the centre of Lymm.

- 3.64 On behalf of our client, we therefore urge the Council to take a more detailed consideration of the actual impact of development of this parcel on the Conservation Area, with reference to the above points, over and above the high level assessment provided in the Green Belt Assessment.

#### **Settlement Profiles – Outlying Settlements (July 2017)**

- 3.65 As set out elsewhere in this representation, Richborough have serious concerns regarding the capacity of the urban area to deliver the identified level of housing development during the Plan period. Additional sites therefore need to be identified in sustainable locations in the outlying settlements, both to avoid the current over-reliance on the urban area and the City Centre in particular, and to continue to maintain the vitality and vibrancy of the outlying settlements.
- 3.66 Lymm is the largest of the outlying settlements which could deliver additional housing and infrastructure capacity, and this is supported by this evidence base document. As set out in Section 2 of this representation, it is therefore logical and appropriate to allocate proportionately more development towards Lymm than the other outlying settlements which have been assessed.
- 3.67 As set out elsewhere in our representations, growth of the scale proposed would place added pressure on existing facilities and would not deliver the additional infrastructure capacity needed to support development. A level of development between Growth Option 1 – ‘incremental’ growth and Growth Option 2 – ‘Sustainable Settlement Extension’ would be more appropriate than the proposed 600 dwelling requirement and the evidence base and content of our representations clearly support this assumption.

#### **Area Profiles Technical Note (July 2017)**

- 3.68 Richborough support the recognition in Appendix 1 of the *Area Profiles 2017* that the preferred growth option of incremental growth in the outlying settlements will require individual parcels making a poor, medium and potentially strong contribution to the Green Belt to be developed.
- 3.69 We also support the recognition in the evidence base documents that incremental growth in the outlying settlements could contribute to the longer term sustainability of local services and local

business, promote local housing choice and deliver a number of smaller sites in the early part of the plan period.

- 3.70 We note however, that the document states at Appendix 1 that the majority of settlements have reasonable health care capacity and therefore incremental development could be accommodated in outlying settlements (Growth Option 2) without overly impacting on capacity. For Lymm, this assertion appears to be in direct contradiction to the Council's evidence set out elsewhere that the proposed level of growth will require the provision of additional primary care capacity.

**Strategic Housing Land Availability Assessment (July 2017)**

- 3.71 The Strategic Housing Land Availability Assessment (SHLAA) update includes Land at Cherry Lane, Lymm under Site Ref. 2705. The document, much like the 2015 SHLAA, includes the sites in the Council's pool of discounted sites due to the site's location in the Green Belt, which is considered a policy constraint.
- 3.72 We would reiterate that in the context of the Local Plan Review the site is available, suitable, and achievable and is therefore entirely deliverable in accordance with the footnote to Paragraph 47 of the NPPF.

## 4.0 Cherry Lane Farm, Lymm

- 4.1 Richborough Estates are currently promoting land off Cherry Lane, Lymm for residential development. Further details of the site is provided in the Development Statement at Appendix C.
- 4.2 The Development Statement confirms that the site has the capacity to deliver up to 200 dwellings as well as land for a new GP's surgery and a new car park to serve visitors to Lymm Dam. It provides confirmation that the site is available, suitable, achievable and deliverable and is being promoted by a Richborough Estates who have a proven track record of housing delivery in the north west and across the country.
- 4.3 The site is therefore well placed to make a contribution towards the need for additional housing identified in Lymm. Accordingly, Richborough submit that land off Cherry Lane should be identified as a residential allocation in the emerging Local Plan as part of the proposed Green Belt release around Lymm.

Appendix A: Education Requirement Analysis

		<b>Additional Dwellings</b>						
<b>Dwelling Mix</b>	<b>Dwelling Mix Rate</b> (Table 3 Lymm)	<b>600</b>	<b>650</b>	<b>700</b>	<b>750</b>	<b>800</b>	<b>850</b>	<b>900</b>
1-bed	0.053	32	34	37	40	42	45	48
2-bed	0.225	135	146	158	169	180	191	203
3-bed	0.4	240	260	280	300	320	340	360
4+bed	0.322	193	209	225	242	258	274	290
<b>Pupil Product</b>		20.097	21.7616	23.4528	25.1594	26.824	28.4886	30.1798
<b>Primary School Places Required</b>		141	152	164	176	188	199	211
<b>1FE (210 places) Primary School Headroom</b>		69 (33%)	58 (27%)	46 (22%)	34 (16%)	22 (11%)	11 (5%)	-1 (-1%)

Appendix B: Primary Care Analysis

<b>Surgery</b>	<b>GP's</b> (Full Time Equivalent (FTE))	<b>Surgery Patient Capacity</b> (1,750 patients per FTE GP)	<b>Registered Patients</b> (28/09/2017)	<b>Patient Surplus / Capacity</b>
<b>Brookfield Surgery</b>	4.5	7,875	9,028	- 1,153
<b>The Lakeside Surgery</b>	5	8,750	10,612	- 1,862
<b>Total</b>	9.5	16,625	19,640	- 3,015

<b>Additional Dwellings Scenario</b>	<b>600</b>	<b>650</b>	<b>700</b>	<b>750</b>	<b>800</b>	<b>850</b>	<b>900</b>
<b>Additional Population</b> (based on 2.35 persons per household)	1,410	1,528	1,645	1,763	1,880	1,998	2,115
<b>Existing Lymm Patient Overcapacity</b>	3,015	3,015	3,015	3,015	3,015	3,015	3,015
<b>Total Lymm Patient Need</b>	4,425	4,543	4,660	4,778	4,895	5,013	5,130
<b>GP's Required to Meet Need</b>	2.5	2.6	2.7	2.7	2.8	2.9	2.9

Appendix C: Cherry Lane Farm, Lymm – Development Statement September 2017

# LAND OFF CHERRY LANE, LYMM



**DEVELOPMENT STATEMENT**  
SEPTEMBER 2017



Richborough  
Estates

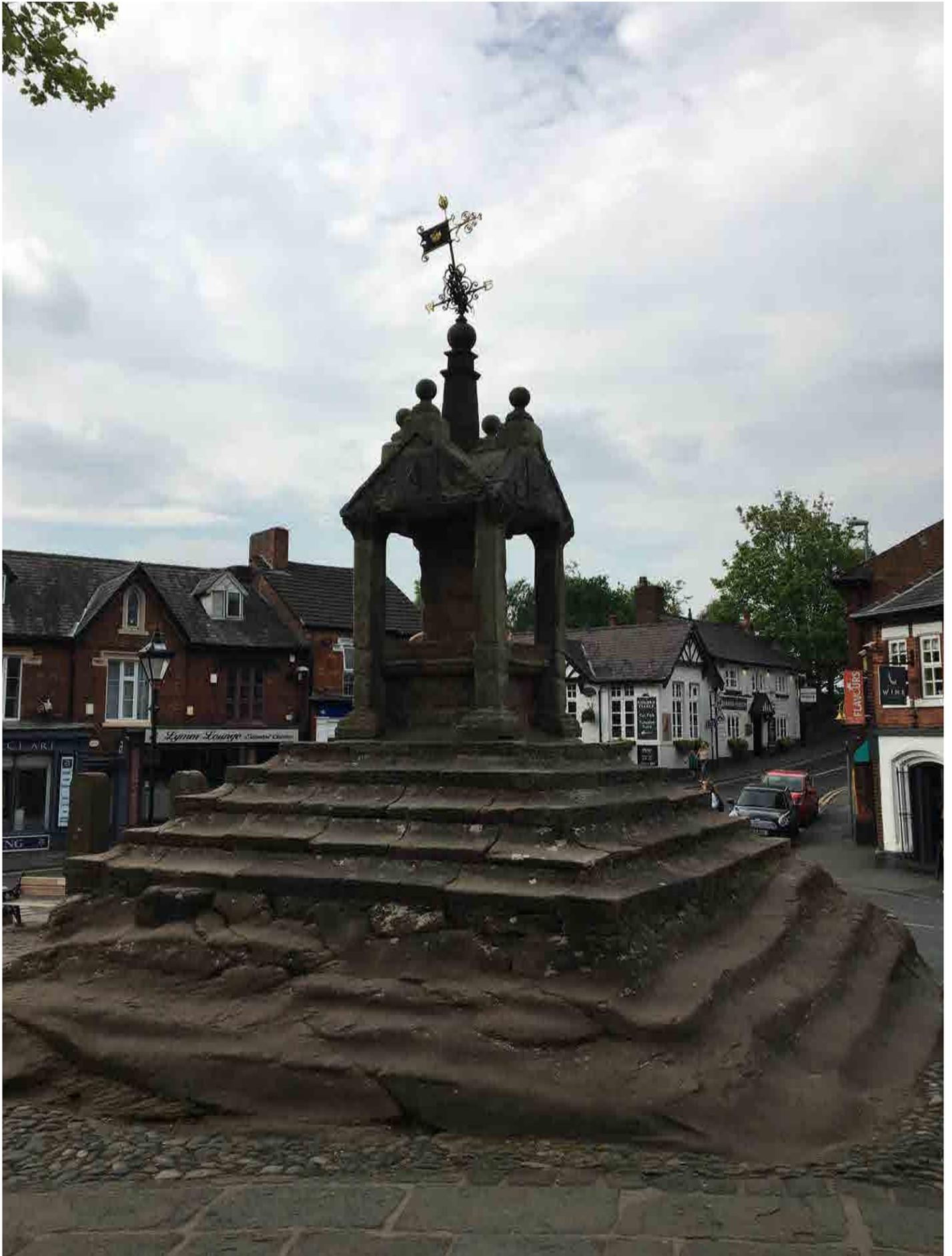
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# 1. INTRODUCTION



**This Development Statement has been prepared by Richborough Estates in relation to a parcel of land off Cherry Lane in Lymm (“the site”). It is submitted to inform the preparation of the Warrington Local Plan. It demonstrates that the site is in an appropriate location for housing and should be released from the Green Belt and identified as a residential allocation in the Local Plan.**

The site comprises three agricultural fields which lie immediately adjacent to the south western edge of Lymm. The site is adjacent to residential development to the north, and surrounded by existing roads on its other three sides. Its development would represent a logical extension to the existing settlement. The site is also easily accessible to the services and facilities in the centre of the village.

## **Purpose of this Document**

This document provides an overview of the technical constraints and opportunities presented by the site and demonstrates that the site is available, suitable, achievable and can therefore be considered deliverable, well placed to contribute towards meeting future housing needs in Warrington. It demonstrates how, with regard to relevant technical and design considerations, the site is able to accommodate in the region of 200 dwellings.

The remainder of this document is structured as follows:

- Richborough Estates Track Record
- Site Location and Description
- Planning Context
- Green Belt Assessment
- Sustainable Location
- Deliverable Site
- Design Principles and proposed Indicative Masterplan
- Summary and Conclusions

# 2. RICHBOROUGH ESTATES TRACK RECORD

Richborough Estates is one of the UK's most successful strategic land promotion companies.



They work on behalf of a wide range of landowners including private individuals, charities, trusts and Local Council / Government estate departments - promoting land through the planning system to secure housing allocations and planning permissions for residential development. They then manage the sale of the site from the landowner to the housebuilder who then build out the site and deliver homes.

Richborough was founded in 2003 and the team works in partnership with landowners, LPAs and stakeholders to bring land forward for housing. The team is made-up of a wide range of development experts who deal with land acquisition and planning issues. Richborough's objective is to deliver 'oven-ready' sites to house builders ensuring that planning permissions are quickly turned into homes for local people. Its approach is closely aligned with the Government's key aim of boosting significantly the supply of new homes.

Richborough is currently promoting over 20,000 dwellings through various stages of the planning process across the United Kingdom, and on average can be promoting up to 100 sites at any one time. Their aim is to leave a lasting legacy for the communities within which they work.

**Richborough Estates experience of residential land promotion leaves them in a good position to be able to confirm with confidence that the Cherry Lane site is deliverable.**

# 3. SITE LOCATION AND DESCRIPTION

## The Site

Land off Cherry Lane (“the site”) lies immediately adjacent to the existing settlement of Lymm. It extends to approximately 12 ha and comprises three agricultural fields forming a polygonal shape. It is bounded by the existing settlement to the north, and three roads along the eastern, southern and western boundaries.

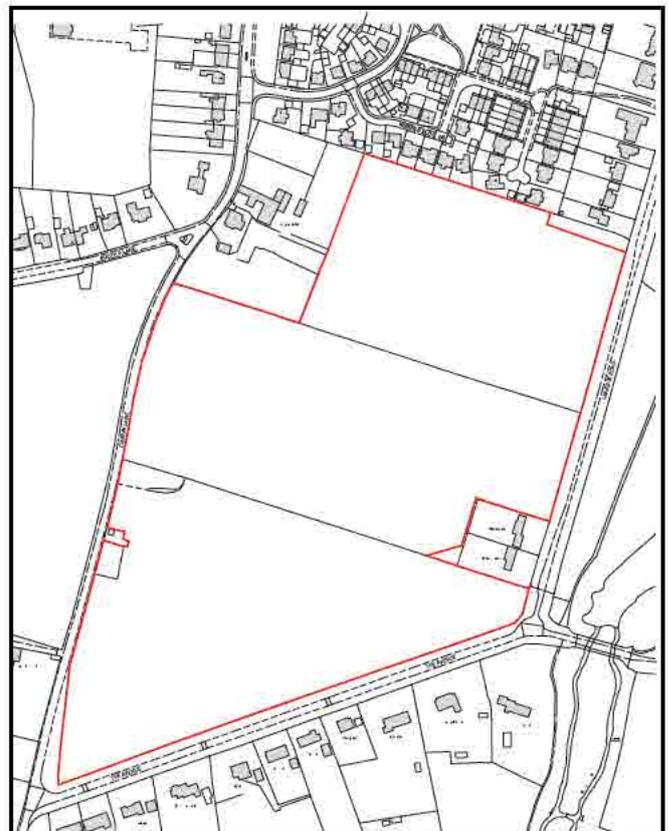
The site has previously been used for arable farming. Existing landscaping is therefore limited to the boundaries of the site – particularly the northern, eastern and southern boundaries. There are also several mature trees scattered across the site. A hedgerow with scattered trees also partly screens the site from Cherry Lane to the west.

The northern boundary of the site is formed by the existing properties of Hunts Field Close and Lady Acre Close, part of a residential estate, which was built in the late 1990s/ early 2000s.

The eastern boundary of the site is formed by Lakeside Road, to the east of which is Lymm Dam and the woodlands and pathways which surround it. The eastern boundary of the site wraps around the rear gardens of the large detached properties of ‘Harwolde’ and ‘Silver How’, which front onto Lakeside Road on its western side. Lakeside Road connects to Church Road (the A56) approximately 500 metres to the north of the site and from there to the village centre.

The southern boundary of the site is formed by another road – The Avenue. A row of large detached houses front onto The Avenue along the full extent of its southern side. These properties have substantial gardens, south of which are further agricultural fields and the woodlands around Bradley Brook.

The western boundary of the site is formed by Cherry Lane (the B5158) which provides the main route between the centre of Lymm to the north to the M6/M56 Junction 20/9 to the south. In the northern part of the site, the western boundary wraps around the Cherry Lane Farm buildings. Some have recently been converted into residential properties. The western boundary of the site also excludes an existing pumping station which is accessed from Cherry Lane. Land immediately to the west of Cherry Lane comprises further agricultural fields, and to the north west, the residential built-up area of Lymm.



Site Location Plan



Lakeside Road



Converted buildings adjacent to Cherry Lane Farm



Site looking north



Footways to west of Lymm Dam



Cherry Lane looking south

## Surrounding Area

The centre of the village is within approximately 700 metres walking distance to the north east of the site via Lakeside Road and Eagle Brow. Within the village centre there are several pubs, restaurants and shops, Lymm Youth and Community Centre, a Post Office and a Pharmacy.

Even closer to the site, a Co-operative Food Store and The Crown Pub are located at the junction of Cherry Lane and Booth's Hill Road approximately 650 metres walking distance via Cherry Lane. Cherry Tree Primary School is around 700 metres to the north west of the site off Hardy Road. Lymm High School is located around 2.5 kilometres of the site on Oughtrington Lane.

Further detail about the connectivity of the site to local services and facilities is contained Section 6.

The centre of Lymm is historic, with several listed buildings. Lymm 'Village' Conservation Area was designated in 1971. It encompasses the centre of the village and extends south to include Lymm Dam which lies to the immediate east of the site.

Lymm is located in the west of the Borough of Warrington, approximately 8 kilometres from Warrington town centre to the west, 5.5 kilometres from Partington and Cadishead to the north east and 8.5 kilometres from Altrincham town centre to the east. The M6 runs in a north to south direction approximately 1.6 kilometres from the village centre.



Houses in the surrounding area



Village centre



Shops and services in Village centre



Historic Centre

# 4. PLANNING CONTEXT

## Adopted Development Plan

The currently adopted Development Plan for the area comprises the Warrington Local Plan Core Strategy which was adopted on 21st July 2014. The site is located within the Green Belt as defined on the adopted Proposals Map.

## Emerging Warrington Core Strategy Local Plan

The Council are currently progressing a Local Plan Review to take account of up-to-date evidence of the Borough's growth needs. The Council have recently consulted on the 'Preferred Development Option Regulation 18 Consultation July 2017' between July and September 2017. This proposes a housing target of 1,113 houses per annum over the 20 year plan period. The Council recognise that in order to accommodate this housing requirement it will be necessary to release green belt land across the Borough. The 'Preferred Development Option' document identifies that Lymm has an indicative capacity to accommodate up to 500 dwellings through Green Belt release. The Council will now undertake detailed site assessment work to inform specific site allocations in the next stage of the Local Plan. Consultation on the proposed Submission Version of the plan is now anticipated to take place in February 2018.

## Evidence Base

### Strategic Housing Market Assessment (May 2017)

The latest evidence on housing need being used to inform the Local Plan Review is the Mid-Mersey Strategic Housing Market Assessment Update – Warrington Addendum (May 2017). This identifies an Objectively Assessed Need (OAN) based on Economic Growth scenarios of 955 per annum up

to 2037.

In order to ensure that the level of anticipated jobs growth is capable of being achieved, the Council is proposing a further adjustment to the identified OAN figure to a housing requirement of 1,113 dwellings per annum.

### Strategic Housing Land Availability Assessment (July 2017)

Land off Cherry Lane has been identified in the latest SHLAA (July 2017) under site reference 2705. The SHLAA identifies the site as constrained for development due to its location within the Green Belt. It concludes that it is premature for the SHLAA to endorse such sites in advance of Warrington's Green Belt Review, and has therefore discounted a number of Green Belt sites on the basis of this policy constraint. In a more detailed assessment of the site, the 2015 SHLAA recognised the site faces no constraints to housing development in terms of ground contamination, site access, surrounding land uses, infrastructure issues or amenity issues.

### Green Belt Assessment

The Council have commissioned a Green Belt Assessment (GBA) of the Borough to inform the Local Plan Review. The site is identified as Parcel LY25 in the GBA (October 2016) and has been assessed as making a 'strong' overall contribution towards the 5 purposes of the Green Belt. An update to this assessment has been provided in response to the Call for Sites consultation exercise in December 2016/ The July 2017 Updated Assessment does not change the conclusions in relation to Parcel LY25. This assessment is considered further in Section 5.

# 5. GREEN BELT ASSESSMENT

**The site is currently within the Green Belt that surrounds the existing settlement. This Section demonstrates how the site makes an overall weak contribution towards the five purposes of the Green Belt as established in paragraph 80 of the National Planning Policy Framework ('the Framework') and can therefore be considered suitable for development.**

Paragraph 80 of the Framework states that Green Belt serves five purposes:

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

The Green Belt Assessment (GBA) (October 2016) and the Additional Site Assessments (July 2017) prepared by Arup has assessed the site at Cherry Lane (identified under reference Parcel LY25) in the original October 2016 Assessment and R18/101 and R18/051 in the July 2017 Additional Assessments.

The Parcel is assessed as making the following contribution to the purposes of the Green Belt:

**Purpose 1: To check unrestricted sprawl of large built-up areas**

**GBA Assessment:** No contribution

**Purpose 2: To prevent neighbouring towns merging into one another**

**GBA Assessment:** No contribution

**Purpose 3: To assist in safeguarding the countryside from encroachment**

**GBA Assessment:** Strong contribution

**Purpose 4: To preserve the setting and special character of historic towns**

**GBA Assessment:** Strong contribution

**Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

**GBA Assessment:** Moderate contribution

**Overall**

**GBA Assessment:** Strong

## **Richborough Estate's Assessment of GBA Findings**

Having reviewed the methodology set out in Section 4 of the GBA, Richborough Estate's have concerns that the conclusions reached in the GBA in respect of the site are fundamentally flawed. The following is a summary of the GBA findings (July 2017) and Richborough Estate's view of the contribution of the site towards each of the 5 purposes of the Green Belt.

**Purpose 1: To check the unrestricted sprawl of large built-up areas**

<p><b>GBA Assessment of Parcel LY25 (R18/101 / R18/051)</b></p>	<p>The parcel is not adjacent to the Warrington Urban Area and therefore does not contribute to this purpose.</p> <p><b>Conclusion: No Contribution</b></p>
<p><b>Richborough Assessment:</b></p>	<p>Agree with GBA Assessment in line with the methodology set out in Section 4 of the GBA.</p> <p><b>Conclusion: No Contribution</b></p>

**Purpose 2: To prevent neighbouring towns merging into one another**

<p><b>GBA Assessment of Parcel LY25 (R18/101 / R18/051)</b></p>	<p>The parcel does not contribute to preventing towns from merging.</p> <p><b>Conclusion: No Contribution</b></p>
<p><b>Richborough Assessment:</b></p>	<p>Agree with GBA Assessment in line with the methodology set out in Section 4 of the GBA.</p> <p><b>Conclusion: No Contribution</b></p>



Lakeside Road and The Avenue - strong defensible boundaries to the south and east

**Purpose 3: To assist in safeguarding the countryside from encroachment**

<p><b>GBA Assessment of Parcel LY25 (R18/101 / R18/051)</b></p>	<p>The site is connected to the settlement along its northern boundary. This consists of garden boundaries, which are not durable and would not be able to prevent encroachment into the site. The site is well connected to the countryside along three sides. The Avenue to the south, Cherry Lane to the west and Lakeside Road to the east form durable boundaries which would be able to prevent further encroachment beyond the site if the site were developed. Along the east and west boundaries there are two sections of the boundary which are not formed by Cherry Lane or Lakeside Road and are the limits of dwellings and Cherry Lane Farm which are not durable however the overall boundary is predominately durable. The existing land use consists mainly of open countryside and there is little vegetation. The site helps to prevent further encroachment particularly given the residential properties on The Avenue. The site supports some long line views to the west and overall supports a strong degree of openness. Overall the site makes a strong contribution to safeguarding from encroachment due to its strong degree of openness and non-durable boundaries with the settlement.</p> <p><b>Conclusion: Strong Contribution</b></p>
<p><b>Richborough Assessment:</b></p>	<p>Having reviewed the methodology set out in Section 4 of the GBA, and the conclusions reached by the GBA in respect of other parcels in Lymm, the assessment of Parcel LY25 as having a 'strong' contribution against Purpose 3 seems unjustified and inconsistent.</p> <p>This is now set out in reference to the assessment criteria for purpose 4 as established in the GBA methodology:</p> <p><b><i>a. Future encroachment: Are there existing durable boundaries which would contain any future development and prevent development and prevent encroachment in the long term?</i></b></p> <p>In the July 2017 Additional Site Assessments the GBA considers the existing residential properties along the northern boundary of the Parcel LY25 do not constitute a 'durable' boundary and would not be able to prevent encroachment into the parcel. Richborough question the assessment of this boundary as 'not durable' given the borders of these properties form a continuous, solid line along this boundary which is well defined by a 15 metre buffer of mature landscaping.</p>

In terms of preventing future encroachment if Parcel LY25 were developed, the GBA acknowledges the existence of durable boundaries around the remaining three sides of the parcel in the form of Cherry Lane, The Avenue and Lakeside Road. We note that the permanence of these boundaries is further reinforced by the existence of Lymm Dam and the surrounding protected woodland immediately to the east of the parcel and the row of dwellings on The Avenue which further contain the parcel to the south.

Overall, it is clear the site represents a well contained parcel of land which is clearly defined by strong, defensible boundaries on all sides which would contain encroachment in the long term if the parcel were developed.

***b. Existing encroachment: What is the existing land use/ uses? Is there any existing built form within or adjacent to the parcel?***

The GBA correctly identifies that the Parcel currently comprises agricultural land with limited built development.

However, the methodology also requires consideration of existing built form adjacent to the parcel. It is therefore an important consideration that the entire northern and southern boundaries of the parcel are directly adjacent to existing residential properties. The GBA seems to conclude that the presence of the dwellings along the southern boundary (along The Avenue) mean the parcel plays a more important role in preventing encroachment. However, this is illogical when these properties in fact contain the southern boundary of the site and prevent any future encroachment should the parcel be developed.

The existing residential properties of Tanners Pool to the west of Cherry Lane in the southern area of the site, the recent development of Cherry Lane Farm, and the two existing properties within the south-eastern part of the site also interrupts the feeling of open countryside surrounding the site.

***c. Connection to the countryside: Is the parcel well connected to the countryside? Does the parcel protect the openness of the countryside?***

As described above, the site is surrounded by man-made defensible boundaries on all sides - existing development to the north, Cherry Lane to the west, The Avenue to the south and Lakeside Road to the east. It is well related to the existing built-up area to the north and north west, a continuous line of development to the south and scattered existing properties to the east fronting Cherry Lane and west fronting Lakeside Road.

We therefore dispute the assertion in the GBA that the site is “well connected to the countryside along three sides” and question the logic for this. There is in fact extremely limited connectivity between the site and the wider countryside both to the east (by virtue of Lymm Dam and the surrounding dense woodland) and to the south (by the existing properties along The Avenue). Whilst there are some views of the parcel from the west these are limited and interrupted by existing vegetation.

***d. Does the parcel serve a beneficial use of the Green Belt (NPPF para 81) which should be safeguarded?***

The Parcel does not serve a beneficial use of the Green Belt.

**Conclusion: Weak Contribution**

## Purpose 4: To Preserve the Setting and Special Character of Historic Towns

<p><b>GBA Assessment of Parcel LY25 (R18/101 / R18/051)</b></p>	<p>Lymm is a historic town. The site does not cross an important viewpoint of the Parish Church. The majority of the site's eastern boundary lies adjacent to the Lymm Conservation Area and the nearby Bridge at Lymm Dam is a Grade II listed building. Therefore the site makes a strong contribution to preserving the setting and special character of historic towns.</p> <p><b>Conclusion: Strong Contribution</b></p>
<p><b>Richborough Assessment:</b></p>	<p>We understand from a review of the methodology that the GBA assessment is given on that basis that the site lies adjacent to the Lymm Conservation Area to the east, and within the 250 metre buffer from the Conservation Area.</p> <p>Richborough Estates appreciate that it is not within the scope of the GBA to undertake a more sophisticated assessment of the potential impact of development on heritage assets within the Borough. However, we take this opportunity to note that whilst Parcel LY25 is adjacent to the Lymm Conservation Area, there is limited inter-visibility between this heritage asset and the parcel given the dense woodland which surrounds the Dam and would screen the fields at Cherry Lane Farm from the majority of public vantage points in the Conservation Area. The Grade II Listed Bridge over the Brook and Dell at the Head of Lymm Dam is situated immediately to the south-east of the parcel but its surroundings are also mainly screened by the mature vegetation.</p> <p>All other designated assets within 1 kilometre of the parcel are screened from it by intervening built development, mature trees and the local topography such that development would not impact these other assets either directly or indirectly.</p> <p>CgMS have assessed the site and the impact of the proposed development on the setting of the Conservation Area. They consider how the dense woodland vegetation screens the Dam from the site and the existing adjacent residential development. The Indicative Masterplan shown in Section 8 demonstrates how development could be designed to respect the character and setting of the Conservation Area, such that development could be brought forward without adverse impact on the setting or significance of this heritage asset or others within Lymm.</p>

	<p>Land at Cherry Lane Farm is well placed to provide a new area of car parking providing visitors with direct access to the trails and woodland surrounding the Dam. This would relieve the pressure on parking along the A56 which lies within in the central part of the Conservation Area. It would reduce the issues of congestion, safety and negative visual impact which currently occur as a result of the demand for parking spaces here. In this way, land at Cherry Lane Farm provides scope to make a positive contribution to preserving the character of the conservation area along the A56 and enhancing the public experience and enjoyment of this important heritage and recreational asset.</p> <p>Richborough Estates understand that it is not the role of the Green Belt Assessment to undertake a detailed analysis of the specific impact on heritage assets or any potential for mitigation. However, scoring a 'strong' contribution against this purpose is the only element of the assessment which sets Parcel LY25 apart from the assessment of the majority of the other parcels around Lymm. Richborough therefore urge the Council to take a more detailed consideration of the actual impact of development of this parcel on the Conservation Area, with reference to the above points, over and above the high level assessment provided in the Green Belt Assessment.</p> <p><b>Conclusion: Weak/Moderate Contribution</b></p>
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**Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

<p><b>GBA Assessment of Parcel LY25 (R18/101 / R18/051)</b></p>	<p>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.</p> <p><b>Conclusion: Moderate Contribution</b></p>
<p><b>Richborough Assessment:</b></p>	<p>All Green Belt has the potential to make a strategic contribution to urban regeneration by restricting the land available for development and encouraging development in urban sites. As such, different parcels of Green Belt land around settlements will have the same contribution towards this purpose.</p> <p>Richborough Estates welcome the recognition of this in the GBA which assesses all sites in Lymm as having the same level of contribution towards this purpose.</p> <p><b>Contribution: Moderate Contribution</b></p>

## Green Belt Assessment Summary

The following table provides a summary of the conclusions reached by Richborough when assessing the site.

	<b>Purpose 1: To check unrestricted sprawl of large built-up areas</b>	<b>Purpose 2: To prevent neighbouring towns merging into one another</b>	<b>Purpose 3: To assist in safeguarding the countryside from</b>	<b>Purpose 4: To preserve the setting and special character of historic towns</b>	<b>Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</b>	<b>Overall Assessment</b>
<b>GBA Assesment of Parcel LY25 (R18/101 / R18/051)</b>	No contribution	No Contribution	Strong Contribution	Strong Contribution	Moderate Contribution	<b>Strong Contribution</b>
<b>Richborough Assessment of Parcel LY25 (R18/101 / R18/051)</b>	No Contribution	No Contribution	Weak Contribution	Weak/ Moderate Contribution	Moderate Contribution	<b>Weak Contribution</b>

**It has been demonstrated that the site makes an overall weak contribution towards the five purposes of including land within the Green Belt and can therefore be considered suitable for development.**

# 6. SUSTAINABLE LOCATION

**The site is in a highly sustainable location, with a wide variety of services and facilities available within a short walking and cycling distance of the site and can therefore be considered an appropriate location for residential development.**

## Retail and other Facilities

A Co-operative Food Store and The Crown Pub are located at the junction of the A56/ Booth's Hill Road and Cherry Lane, approximately 700 metres to the north of the site. Lymm Village Centre is located further east along Booth's Hill Road and Eagle Brow, approximately 1,200 metres walking distance from the site. In the centre of the village are a range of restaurants, cafes, pubs and shops as well as a Post Office and a Pharmacy. Lymm also benefits from a library, Lymm Youth and Community Centre, a village hall, multiple gyms and a leisure centre and several places of worship.

The village centre can also be accessed on foot/ cycle along Lakeside Road to the east of the site or via the footpaths around Lymm Dam.

## Health Facilities

The nearest NHS Surgery from the site is the Lakeside Surgery, a short distance from the site along Lakeside Road. Brookfield Surgery also provides NHS services in the centre of the village. There are several dentists in and around Lymm, with Lymm Dental Practice in the centre of the village and Higher Lane Dental Practice approximately 1500 metres away, along the A56. There is also a Pharmacy in the centre of the village. The Preferred Development Option Consultation identifies the need for additional primary care capacity that new development will help deliver.

## Education

Cherry Tree Primary School is approximately 700 metres walking distance to the north west of the site off Hardy Road. Statham Community Primary School and Ravenbank Community Primary School are both approximately 2 kilometres from the site. In terms of secondary education, Lymm High School is located around 2.5 kilometres of the site on Oughtrington Lane in the east of the settlement.

The evidence base supporting the Local Plan Review identifies that the 4 primary schools in Lymm are at or nearing capacity. Of the existing schools, it is noted that Cherry Tree Primary School is the only one with expansion potential.

## Employment

Employment opportunities are provided through the wide range of shops and services within the centre of Lymm. Further afield, connections via public bus services enable easy access to the employment destinations of Warrington, Trafford and Manchester City Centre.

## Public Open Space

Lymm Dam and its surrounds, immediately adjacent to the site provides ample opportunity for recreation. Lymm Rugby Football Club is located on the other side of the Dam, approximately 400 metres walking distance from the site. Lymm Lawn Tennis Club is approximately 700 metres walking distance via Lakeside Road. Lymm Golf Club and Sow Brook Playing Field lie to the north side of the village and provide further opportunities for outdoor sports. The Ridgeway-Grundy Memorial Park provides

formal open space approximately 1000 metres from the site. The site is well related to a network of public footpaths which lead around the Dam, through the village centre, along the canal and also provide access into the surrounding countryside.

**In accordance with the National Planning Policy Framework, land at Cherry Lane is suitably located for housing development as it is accessible to a wide range of education, healthcare, retail, community and recreation facilities. It is also well served by public transport.**



Facilities in village centre



Co-op at junction of Cherry Lane / Booths Hill Road



St Mary's Church



View into village centre



Village shops

# 7. A DELIVERABLE SITE

**Footnote 11 to Paragraph 47 of the National Planning Policy Framework ('the Framework') confirms 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 can be delivered within the next 5 years.**

**The site at Cherry Lane can be considered deliverable in this context.**

## Available

The entire site has previously been promoted by the landowners through the Warrington Call for Sites in December 2016. Richborough Estates now have an agreement with the landowners to actively promote the site as a residential allocation through the emerging Local Plan Review.

Richborough Estates have a proven track record of facilitating the delivery of high quality housing developments on suitable and sustainable sites and can confirm that the site at Cherry Lane can be delivered for housing within the early phases of the Local Plan. As such, the site can be confirmed as being available.

## Suitable

Lymm is one of the largest settlements in the Borough after Warrington. It benefits from a wide range of shops and services and is an appropriate and highly sustainable location to direct a proportion of future housing growth in Warrington in accordance with national planning policy.

The Preferred Options Consultation Document identifies how additional growth in Lymm will require additional health care and education capacity in the village.

Section 6 of this Statement demonstrates that the site is well related to the village, easily accessible to a range of local facilities and services. Section 5 shows how the site does not make a strong overall contribution towards the purposes of including land

in the Green Belt, and can be considered a logical release for development. With regard to several key technical constraints and considerations, land at Cherry Lane represents one of the most appropriate sites to accommodate new housing development in Lymm over the next plan period, when compared to alternative sites in the village:

- **Highways:** The site is located to the south of Lymm and would be accessed directly via the only road which provides a direct route between Lymm and the M6/ M56 Motorways. The site is therefore unique among all other potential housing sites in Lymm in that it allows direct access to the strategic road network without the need for traffic to go via the local roads through the centre of the village and/or via the rural road network to the east.

New housing in other parts of Lymm would worsen existing traffic issues. It would add to traffic using the already constrained and congested roads through the centre of Lymm as a through route. Alternatively, traffic travelling east from Lymm, must either use Warburton Lane through Partington to the east, or the B5159 and over the congested Warburton Toll Bridge to connect to the A57/Manchester Road to the north or travel via Mill Lane (the B5169) to the south east of Lymm and via a weight and height restricted tunnel under the Bridgewater Canal.

Transport Consultants PTB have assessed the traffic impacts and access considerations

associated with potential identified housing sites in Lymm. This work has demonstrated that in general terms, sites to the north west, north east or south west of Lymm are forecast to have the least impact on the centre of Lymm and/or the A56 corridor.

- **Proximity to Local Facilities:** It can be seen that given the historic pattern of growth in Lymm, the site represents one of the most sustainable locations in Lymm to accommodate major new housing growth, being closer to facilities within the village centre than the majority of other potential housing sites.
- **Flood Risk:** The site is located entirely within Flood Zone 1. It therefore does not face constraints related to flood risk and drainage unlike the majority of land to the north of Lymm which lies within Flood Zone 3.
- **Community and Heritage Benefits:** The site at Cherry Lane is uniquely located to provide a new area of car parking for visitors to Lymm Dam and therefore help to relieve existing pressure elsewhere in the village (namely along the A56 to the north of the Dam) and contribute

towards preserving and enhancing the Lymm Conservation Area.

The Indicative Masterplan also shows how the site could accommodate a new GP's surgery to meet the need identified in the Council's evidence base.

- **Agricultural land quality:** All of the land surrounding Lymm is identified as either Grade 2 or Grade 3 agricultural land. The site is located in an area of Grade 3 land, therefore less valuable and more suitable for release than much of the land in the north east of Lymm particularly around Rushgreen, which is identified as better quality Grade 2 land.

### Achievable

Richborough Estates have assessed the physical characteristics of the site along with any other technical considerations and can confirm that development of the site is commercially viable. Richborough Estates are confident that when taking all known factors into account the site could be developed for approximately 200 dwellings in a manner which would be appropriate to its setting and



Cherry Lane looking north

represent a natural, sustainable extension to the existing settlement.

The following is a summary of the technical factors associated with development of the site.

### **Access and Highways**

The site has an extensive frontage onto Cherry Lane along its western boundary, and the road is relatively straight in the vicinity of the site. It is confirmed that a safe and suitable access can be achieved with regard to visibility splays and the proximity of other junctions. A 30 mph speed restriction along Cherry Lane currently extends from the centre of Lymm to just to the south of Cherry Lane Farm. It is anticipated this can be extended southwards if necessary.

An existing pavement runs along Cherry Lane providing a safe pedestrian access route into the centre of Lymm. Pedestrians and cyclists would also have the opportunity to access the centre of Lymm via Lakeside Road or the footpaths around Lymm Dam. The Mersey Valley Trail runs alongside the western and southern boundaries of the site. This route links Runcorn to Lymm and provides access to a wider network of public footpaths within countryside and green belt. The Indicative Masterplan in Section 8 demonstrates the opportunities to deliver a development that is well connected to the surrounding road and footway network.

The early stage assessment undertaken by PTB Transport Consultants has demonstrated that the location of the site is favourable in terms of the impact through Lymm village centre and along the A56 corridor.

### **Ecology**

There are no designated sites of nature conservation interest within or adjacent to the site. Given its agricultural use, the habitats within the site are common and of limited value. The site is surrounded by roads on all sides and a residential estate on the other. The opportunities for links to other nearby habitats are therefore also limited.

As set out in Section 8, existing trees and hedgerows will be incorporated into any future development along with appropriate buffers to preserve their value as wildlife habitat. Opportunities for ecological enhancement would

also be incorporated such that there could in fact be a net biodiversity gain as a result of the proposals.

Overall, given the nature and location of the site, there are no overriding constraints to its development in terms of ecology and it is considered the site can be delivered in a manner which provides appropriate mitigation and biodiversity enhancements.



Hedgerows on site

### **Arboriculture**

Given the use of the site for agricultural land, it has very limited vegetation other than hedgerows along the boundaries of the site and a number of mature trees and groups of trees within the site and scattered along the boundaries. Rows of poplar trees line the eastern and southern boundaries of the site and are excluded from the site boundary. It is anticipated that existing trees and hedgerows will be retained and incorporated into the scheme wherever possible. Along with substantial new planting, this will help to ensure that new development integrates positively in the surrounding area.

Given that the majority of the tree cover on the site is confined to the boundaries, trees on the site are not considered to present a significant constraint to development. It is anticipated development can come forward with only a very limited degree of tree loss.

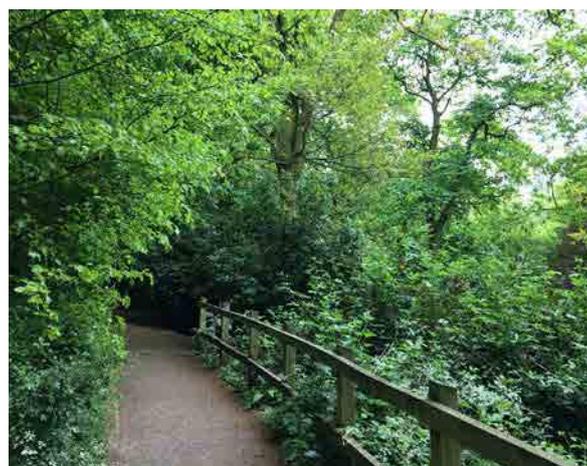
## Heritage

Heritage consultants CgMS have undertaken an initial assessment of the site to inform the Indicative Masterplan. There are no designated heritage assets (Listed Buildings, Scheduled Monuments, Registered Battlefields or Parks and Gardens) on the site. Lymm Village Conservation Area abuts the east side of the study site. There are a number of designated heritage assets within 1 kilometre of the site, predominantly in the centre of Lymm. There is a Grade II Listed Bridge over the Brook and Dell at the Head of Lymm Dam, which is situated to the immediately to the south-east of the site.

There is no Conservation Area Appraisal which might provide some detailed understanding of the significance of the asset or the contribution the setting makes to it. The assessment by CgMS notes that the Dam is surrounded by mature woodland vegetation, which is particularly dense on the west side of the Conservation Area, adjacent to the site. This screens the Dam from the site and the residential development currently situated to the north along Lakeside Road. The Indicative Masterplan in Section 8 shows a green buffer along the eastern boundary of the development, with the proposed dwellings set back from the Conservation Area and at a similar rhythm and low-level density as the existing houses along Lakeside Road. This design approach will ensure the character and setting along Lakeside Road adjacent to the Conservation Area is preserved.

CgMs conclude that the Listed Bridge to the south-east of the site will not be directly impacted by the proposals. Its setting is at the head of the Dam but its surroundings and key views from the bridge are mainly screened by the mature vegetation. The other key view is to the west onto the site and out along The Avenue. The Indicative Masterplan shows a green buffer along The Avenue and within the south east corner of the site which will help to maintain this view and therefore setting of the Listed Bridge.

All other designated assets within 1 kilometre of the parcel are screened from it by intervening built development, mature trees and the local topography such that development would not impact these other assets either directly or indirectly.



Footpath along western side of Dam



Looking west from Listed Bridge towards the site



Lymm Dam

## Flood Risk and Drainage

The entire site is located within Flood Risk Zone 1 with reference to the Environment Agency flood maps. Residential development would therefore be entirely acceptable in line with national guidance on flood risk. The site is relatively flat and therefore it is not anticipated there would be any issues with ensuring a residential development on the site could be adequately drained.

## Agricultural Land

All of the land surrounding Lymm is identified as either Grade 2 or Grade 3 agricultural land. The site is located in an area of Grade 3 land, therefore less valuable and more suitable for release than much of the land in the north east of Lymm.

## Utilities

There are no power lines or public sewers crossing the site which would act as a constraint to development. It is anticipated that residential development on the site will be able to connect to the existing utilities networks which serve the area. The presence of the relevant utilities networks in the area is evident given the residential development to the immediate north of the site which took place around 2000. Further investigations and enquiries would reveal any improvement works or on site provision deemed necessary.

**A review of technical considerations has confirmed that there are no physical characteristics or other constraints that would prevent the delivery of housing at the site. Overall, it is demonstrated that the site is available, suitable, achievable and therefore deliverable.**



The site



Nearby houses



Cherry Lane Farm from across the site



# 8. DESIGN PRINCIPLES

**An Indicative Masterplan has been produced by Richborough Estates to demonstrate how the site could be delivered for residential development in a manner which responds appropriately to the specific opportunities and constraints of the site and integrates into the surrounding area.**

## Context of the Surrounding Area

The site is located to the south west of the existing settlement of Lymm and its development would form a natural extension to the existing built up area. Adjacent to the northern boundary of the site is a relatively modern development along Lady Acre Close and Hunts Field Close. This development was built around 2000 and comprises a mix of two to three storey detached dwellings and townhouses formed around cul de sacs accessed off Cherry Lane.

Linear patterns of properties along Lakeside Road and The Avenue comprise large detached properties of varying styles with generous front and rear gardens.

To the north west of the site, along Cherry Lane, Booths Lane, Highfield Road and further north are established residential areas comprising a mix of semi-detached and detached houses of varying densities and ages, predominantly post-war.

The centre of Lymm is historic and contains several listed buildings and structures. This older part of the village is separated from the site by modern residential estates.

The wider area to the south and west of the site comprises agricultural fields with hedgerows and trees defining the boundaries and a few scattered agricultural/ residential buildings. To the immediate east of the site is Lymm Dam and the surrounding dense woodland and pathways.



Lakeside Road



Modern houses to north of site



The Avenue

## Site Considerations

The following physical features will be important considerations in the design of the development:

- **Trees and Hedgerows.** Existing vegetation on the site is largely limited to the field boundaries. There are a number of mature trees scattered across the site. These features should be retained as far as possible and integrated into a green infrastructure network.
- **Ecology.** Whilst the habitats on site are considered to be common and of limited value, existing on-site vegetation will provide roosting, commuting and foraging habitats for bats and birds. These features should be retained, enhanced and sensitively assimilated into a green infrastructure network.
- **Relationship with adjacent properties.** The development must be carefully designed to respect the adjacent residential properties and ensure the amenity of existing neighbours is preserved.
- **Relationship with wider countryside.** Lower density development and areas of open space and landscaping should be incorporated along the edges of the site to preserve the semi-rural character of the wider surrounding area.
- **Adjacent conservation area.** The development should be carefully designed with respect to the adjacent Lymm Dam and Woodland to ensure no adverse impacts on this important heritage asset or the public's enjoyment of it for recreational purposes.
- **Links to surrounding highways and footways.** Cherry Lane provides an opportunity to achieve vehicular access from the west of the site. The development should also maximise opportunities to strengthen pedestrian linkages

to existing footways around Lymm Dam and Lakeside Road to the east.

## Proposed Indicative Masterplan

Whilst the Proposed Masterplan is purely indicative at this stage, it demonstrates Richborough Estates' vision for the site. The design principles of the Indicative Masterplan and how they respond to the site specific features and context can be summarised as follows:

### Sustainable Mixed Community

- A residential development comprising approximately 200 dwellings. The indicative masterplan allows for the provision of a range of housing types and sizes in order to create a balanced community and offer new housing choice.
- Affordable housing provision in line with the requirements of local planning policy.
- An overall net development parcel of approximately 18.7 hectares, equating to a net average density of 26 dwelling per hectare, which is reflective of the surrounding area.
- Land for a GP's Surgery has been incorporated in the Masterplan in a location well-related to the existing settlement in order to serve as a key community facility for the wider population of Lymm.
- A new area of car parking to serve visitors to Lymm Dam and relieve congestion elsewhere in the village.

### Landscape-led

- The Indicative Masterplan demonstrates a landscape-led approach, with 4.7 hectares of the 12 hectare site shown as publicly accessible green space.
- Two focal areas of public open space are shown in the central part of the development. These

will complement higher density development, be overlooked by the proposed dwellings and provide children's play areas. These spaces also address areas which the Environment Agency indicates as being prone to surface water flooding.

- The outer edges of the site are reserved as open green space to achieve a rural character, incorporate existing and new landscaping and help filter views of the site from the surrounding area. In particular, woodland block planting is proposed along the western boundary to achieve a soft transition to the wider countryside to the west.
- The areas of green space will provide scope for biodiversity mitigation and enhancement measures across the site.

### Well-connected and Permeable

- The development is proposed to be served by two vehicular access points via Cherry Lane. Appropriate visibility splays can be achieved to accommodate the development. A principal street provides a looped route through the development and underpins a hierarchy of streets.
- A series of pedestrian links are proposed, connecting the site to Cherry Lane, Lakeside Road and the adjoining Mersey Valley Trail. These links maximise pedestrian connectivity, encouraging residents to walk/ cycle to nearby facilities and helping to integrate the development with the rest of the village.

### Sensitively Designed Layout

- Higher density housing is located in the central core of the development, with lower density at the site edges. Larger detached dwellings are located in the outer edges of the development in response to the character of The Avenue, Cherry Lane and Lakeside Road.

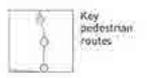
- New streets have a linear block structure which take design cues from surrounding residential areas such as Highfield Road, Hardy Road and Booths Lane. A hierarchy of streets is indicated, allowing the outer edge of the development to be served by low-key private drives and lanes engendering a softer, more rural character.
- Development within the north of the site replicate the existing street and block structure proportions of contemporary development in Hunts Field Close, logically extending the existing urban edge southwards into the site.
- Drawing upon the character of Booths Lane, The Avenue and Lakeside Road, outer edges of the development comprise linear patterns of dwellings, set within large treed plots with varied gaps between them. These areas are proposed to be filtered by new and existing landscape which serves as a buffer to the adjoining Conservation Area and Listed Bridge, thereby preserving the setting of these heritage assets.
- Larger plots to the east, south and west provide scope to provide walled, gated and landscaped frontages to align with the character of the Conservation Area.
- A visitors car park for Lymm Dam is proposed in the southern area of the site to relieve issues of congestion, safety and negative visual impact due to parking along the A56 to the north of the Dam, which currently detract from this part of the Conservation Area.
- Land for a GP's Surgery is located in the north-west of the site to maximise its accessibility to the wider community of Lymm.

# Indicative Masterplan



## KEY DESIGN PRINCIPLES

1. Proposed vehicular access and linear principal street;
2. Looped residential street with landscape theme;
3. Outward facing residential blocks taking cues from existing context (Hunts Field Close);
4. Continuation of existing linear building line;
5. Low density, linear residential edge;
6. Verdant development character area;
7. New woodland planting;
8. Potential 'early implementation' area of landscape;
9. Proposed pedestrian crossing;
10. Green link between Cherry Lane and Mersey Valley trail;
11. Focal green space with children's play area;
12. Green space incorporating existing trees;
13. New visitor's car park for Lymm Dam;
14. Higher density development core;
15. Continuation of existing urban edge;
16. Green edge;
17. Treed green links to Mersey Valley trail;
18. Soft linear edge mirroring Booths Lane;
19. Existing Avenue trees and housing set back to respond to existing patterns in adjoining Conservation Area; and
20. Potential location for doctors surgery.



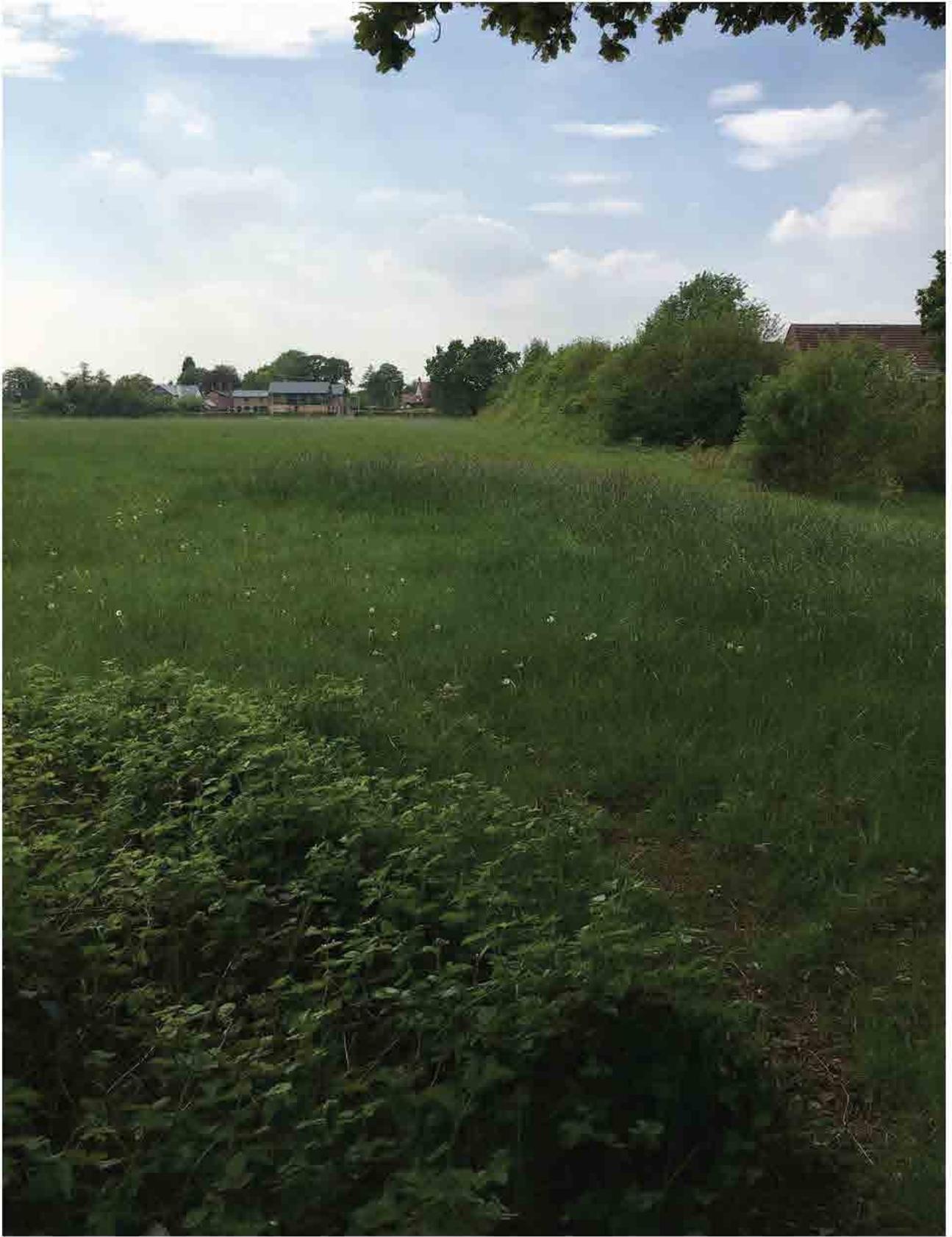
# 9. SUMMARY AND CONCLUSIONS

**Land off Cherry Lane site represents a sustainable, logical development opportunity on the edge of Lymm which is well placed to contribute towards meeting local housing needs in Lymm and those across Warrington as a whole. The site is now being actively promoted by Richborough Estates and is considered capable of delivering around 200 new homes in a matter which responds positively to the context of the site and surround area.**

This Development Statement has demonstrated the following:

- The Land at Cherry Lane is well related to the existing urban area and will form a natural extension to Lymm.
- The site is within walking distance to a range of local facilities and services in the village, and has good public transport links to destinations further afield. This is therefore a particularly suitable location for housing.
- When considered against the five purposes for including land within the Green Belt set out in paragraph 80 of the Framework, the site is considered, at best, to make a weak contribution and so can be considered appropriate for release from the Green Belt.
- There are no physical or other technical constraints which would prevent the development of the site for housing. It has been demonstrated that the site is available, suitable, achievable and deliverable in the short term.
- The site lends itself to housing development and a number of opportunities exist to deliver a sustainable urban extension comprising of high quality family housing through a landscape led approach to masterplanning.
- The site presents a unique opportunity to provide additional car parking to serve visitors to Lymm Dam and relieve congestion in the centre of the village.
- The site also presents an opportunity to deliver a new GP's Surgery, as required to accommodate the proposed housing growth in Lymm.
- The Indicative Masterplan sets out Richborough Estates' vision for the site and key design principles which would ensure the development responds positively to its context – protecting the amenity of existing residents, preserving and enhancing the special character of Lymm Dam and the adjacent Conservation Area and achieving a rural character with a soft transition to the surrounding countryside.

**As a long established residential land promoter, Richborough Estates has an excellent track record of facilitating the delivery of sites. Richborough can confirm Land off Cherry Lane is available, suitable, achievable and deliverable, for housing in the short term.**



# Land off Cherry Lane, Lymm Development Statement

Appendix D: Highways and Transportation Note



**Preferred Development Option  
Regulation 18 Consultation (July 2017)**

**Representations**

on behalf of Richborough Estates

September 2017

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London

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Birmingham

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Manchester

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Thames Valley