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Dear Sir/Madam

Warrington Local Plan Review – Preferred Development Option Regulation 18 Consultation July 2017

Following a detailed consideration to the Regulation 18 Consultation on the Warrington Local Plan Review, we wish to make a number of comments on behalf of our clients, thirty-five residents from Lymm. Names and addresses of the residents are supplied in appendix I.

The residents wish to make this representation with reference to the consultation on land being removed from the Green Belt for housing and specifically a site adjacent to the Grade II Listed Lymm Water Tower. The Water Tower lies adjacent to a parcel of land in the Green Belt which was promoted for housing development by Berrys on behalf of the landowners in the last Warrington Local Plan Review and for the Call for Sites process in 2016. The land was identified as reference 2901 in the 2015 SHLAA and referred to with this reference by Berrys.

This representation will make the case why it is considered that this site should not be released from the Green Belt.

Local Plan Review

Warrington Borough Council have confirmed the level of future development requirements and the need for Green Belt release. The Council have considered 3 high level spatial options to achieving this growth as follows:

- Option 1 – Green Belt release only in the proximity to the main Warrington urban area;
- Option 2 – Majority of Green Belt release adjacent to the main urban area with incremental growth in outlying settlements; and
- Option 3 – Settlement extension in one or more settlement with remainder of growth adjacent to the main urban area.



Option 2 has been confirmed by the Council as the preferred option. This preferred option defines an approximate number of homes to be accommodated in Lymm as 500.

The site in question, adjacent to the Lymm Water Tower, was assessed as part of an original Green Belt Assessment in October 2016 by Arup for the Council. The site was assessed as part of a larger parcel, LY22, which was considered to make a 'strong' contribution to the Green Belt. The definition of 'strong' being defined in the report as 'on the whole the parcel contributes to the purpose in a strong and undeniable way, whereby removal of the parcel from the Green Belt would detrimentally undermine this purpose'.

The Council has prepared a supporting document titled 'Settlement Profiles – Outlying Settlements' July 2017. These profiles provide a detailed assessment of the capacity of local facilities and infrastructure which have helped inform the options for where development should go. The growth scenario of 500 homes is assessed with regard to impact on the Green Belt. The document states that it is likely to require parcels making a weak and moderate contribution to the Green Belt to be developed without releasing parcels which make a strong contribution. The number of sites which were considered to make a strong contribution to the Green Belt around Lymm was 16, 8 parcels were considered to make a moderate contribution and 4 considered to make a weak contribution.

Furthermore, the Council's own Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) July 2017 assessed the smaller parcel of land which has been promoted for housing under SHLAA reference 2901, renamed parcel R18/076 in this more recent document. The overall assessment of this smaller parcel was also as a 'strong contribution' as per the larger parcel LY22.

Although, the Preferred Option for Development does not yet state which parcels of land should be considered for release from the Green Belt, we are reiterating at this stage why site R18/076 must remain in the Green Belt.

Green Belt Assessment

Paragraphs 79 and 80 of the NPPF set out the role and purpose of the Green Belt in England, as follows:

“79. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are openness and permanence.

80 Green Belt serves five purposes:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and specialist character of historic towns; and
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.”



Arup used the five purposes to assess parcel LY22 and Berrys also used the five purposes to assess the smaller part of the site as part of its submission for the landowners. As above Arup concluded that LY22 made a 'strong' contribution to the Green Belt. When assessing the smaller site Berrys concluded that the site made a 'moderate' contribution to the Green Belt with the difference in assessment down to a difference in the assessment of purpose three, 'to assist in safeguarding the countryside from encroachment'.

The Berrys submission was prior to the Warrington Borough Council assessment of the site R18/076 previously known as 2901.

The below table illustrates the difference in opinion from Berrys with Arup and Warrington Borough Council with regard to purpose three of the Green Belt.

Table 1. Comparison of comments in relation to the assessment of purpose 3 of the Green Belt – To assist in safeguarding the countryside from encroachment.

Arup comments on Parcel LY22 Greenbelt Assessment 2016	Berrys comments in relation to site 2901 (R18/076) – Local Plan Review 2016	Warrington Borough Green Belt Assessment July 2017 site R18/076
<p>“Strong contribution: The parcel is connected to the settlement on its northern and north western sides along hedge lined garden boundaries. These are not durable and would not be able to prevent encroachment into the parcel. The parcel’s boundaries with the countryside largely consist of hedge and tree lined field boundaries,as well as the unmade Whiteleggs Lane along the eastern boundary. These boundaries are not durable and would not be able to prevent encroachment beyond the parcel if the parcel was developed. The existing land use mainly consists of open countryside. There is moderate vegetation forming internal hedgerow boundaries within the parcel and a small number of active farms. There are also a small number of residential properties in the parcel’s north eastern corner and the parcel helps to prevent further encroachment along</p>	<p>“Moderate contribution: There is existing residential development on two and a half sides of the site. A woodland copse on the eastern boundary provides strong boundary in this direction that would contain encroachment in the long term if the parcel were developed. This containment weakens the contribution made to this purpose”</p>	<p>“Strong contribution: The site is connected to the settlement on its northern and north western sides along hedge lined garden boundaries. These are not durable and would not be able to prevent encroachment into the site. The site’s boundaries with the countryside largely consist of field boundaries, the southern boundaries are unmarked and the eastern boundary is a hedge and tree lined field boundary. These are not durable boundaries which could prevent encroachment beyond the site if the site was developed. The existing land use is open countryside that is in agricultural use. There is no built form and low level of vegetation within the site which supports long line views of the surrounding countryside and overall supports a strong degree of openness. Overall the site makes a strong contribution to safeguarding from encroachment due to the non-durable boundaries between the site and the countryside and the site and the settlement, and a strong degree of openness the site supports.”</p>



<p>Higher Lane. The parcel supports long line views of the surrounding countryside and overall supports a strong degree of openness. Overall the parcel makes a strong contribution to safeguarding encroachment”</p>		
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Warrington Borough Council assessed the site R18/076 to make strong contribution to purpose 3.

We strongly agree with the assessment of the site by Warrington Borough Council in July 2017 and with Arup’s comments regarding the site as part of the larger parcel of land.

As the site is not bound by a physical boundary such as a road, the site is more vulnerable to encroachment due to the non-durable boundaries. However, the fact that there are non-durable boundaries of hedges and tree lined fields adds to the enhancement of the countryside. With the land open without built form and only a low level of vegetation the openness of the land is retained which concurs with paragraph 79 of the NPPF and the fundamental aim to keep land open with the essential characteristic of Green Belts being their openness.

The Council’s Landscape Character Assessment 2007 describes Lymm as having few internal views of note, with Lymm Water Tower and St Peter’s Church, Oughtrington being the exceptions and forming local landmarks (p268). The Character Assessment also states that the “recent housing expansion of Lymm however into greenfield sites has fundamentally altered and reduced the rural character of the area for which it is renowned” (p273). The combination of the open rolling landscape and unrestricted views of this site provide a high quality landscape which helps to retain the rural character of this part of Lymm. The assessment highlights the importance of the view of the Water Tower and importance retaining what remains of the rural character of the area for which is it renowned and which has been reduced over time.

We are not commenting on the acceptability of the indicative Green Belt capacity of 500 homes in Lymm but the Council’s supporting documents find that the homes could be accommodated without having to release sites which make a strong contribution to the Green Belt. With the availability of sites with ‘weak’ and ‘moderate’ contributions to the Green Belt there should be absolutely no need to look at sites which perform strongly against the purposes of the Green Belt including this site adjacent to Lymm Water Tower.

Historic environment

In addition to the importance of this site with regard to the principles of the Green Belt, there is also the significance of the Grade II Listed Water Tower and its setting. The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. As paragraph

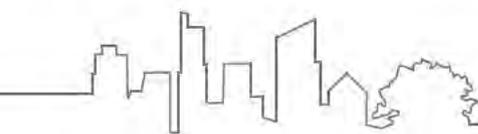
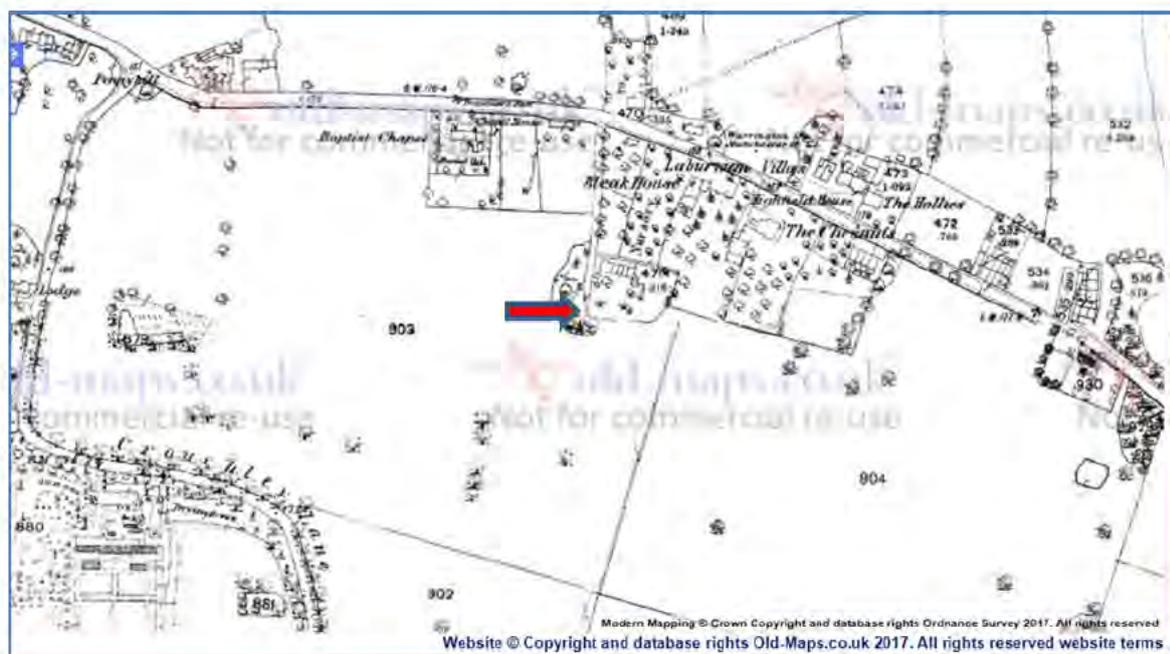


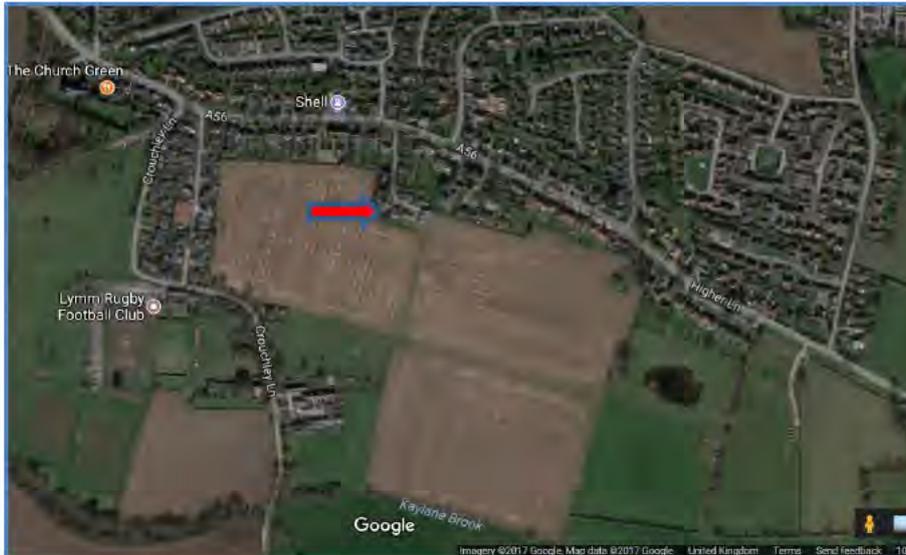
132 of the NPPF states “significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting”.

Setting of a heritage asset is described in the glossary of the NPPF as “The surroundings in which a heritage asset is experienced”. The Victorian Water Tower was designed to replicate the look of a castle on a hill, to be viewed from the surrounding countryside. The grounds of the current Water Tower have been specifically designed to interrelate with the adjacent field and maintain the setting of the listed building without the need for fencing. Therefore, any development on the adjacent site would potentially affect the setting of this listed building.

The Water Tower dates from the mid-nineteenth century and its setting when viewed from the west and south-east would have been much as it is today through the open fields. There is development to the north-east and north-west of the Tower with views of the Tower also obtained from the south, south-west and south-east.

The below map from 1875 illustrates that the setting of the Water Tower (identified by the red arrow) is much as it is today, as shown in the present day aerial view below.

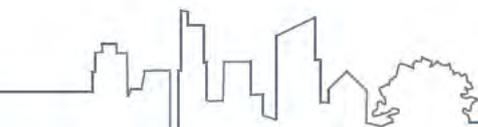
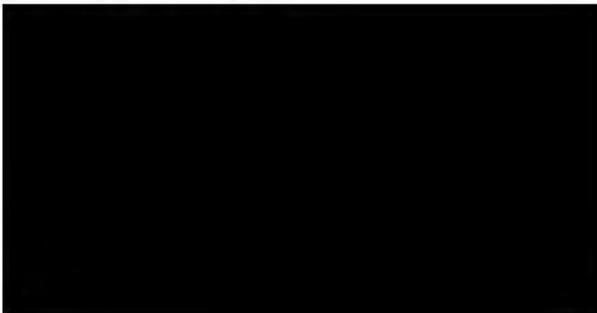




Conclusion

As stated above we are not commenting on the need for 500 homes to be built in the Green Belt around Lymm. However, should this requirement go forward, this site should certainly not be released for housing development. The site makes a strong contribution to the purposes of the Green Belt and development on this site will harm the setting of the Listed Building.

Yours faithfully,



APPENDIX I

