



Dear Sir/ Madam,

**Response to Regulation 18 Consultation on Local Plan – Preferred Development Option**

We are writing in response to the above consultation exercise to express our views as residents of Warrington on certain proposals contained in the consultation document, with which we disagree.

**1. Housing Need and Green Belt**

We are concerned to note that in para. 4.7 of the consultation document the Council is proposing a housing target for the plan period of 1,113 homes p. a. This appears to be based on a level of growth proposed in the Strategic Economic Plan (SEP) prepared by the Cheshire and Warrington LEP which will see Warrington transform itself into a New City (see paras. 4.5/ 4.6).

However, the consultation document does not appear to consider what the position would be if the growth envisaged by the SEP does not fully materialise, especially in view of the “uncertainties of forecasting future job growth” (para. 2.21). No account appears to have been taken of the impact of Brexit and a possible medium-term downturn in the local economy, or whether the projected New City ambitions of the Council will come to fruition. We were also not aware that the residents of Warrington had been consulted on and agreed to the proposal to turn their town into a “Garden City” – by what mechanism was that agreed?

The above issues are important because if the SEP’s projected growth rate for jobs and the Warrington economy is not achieved, large areas of the Borough including what is currently Green Belt will have been allocated for housing development without the complementary employment and infrastructure growth to support the increased population. Housebuilders will understandably wish to build on the allocated sites regardless of whether the supporting jobs and infrastructure have been provided, and will naturally home in on the former Green Belt sites. In those circumstances it would be very difficult for the Council to refuse planning permission.

The consequence would be an intensification of housebuilding in the Borough, particularly in the more “leafy” Outlying Settlements such as Lymm, which will largely serve as “dormitory” settlements for those employed in Manchester, Liverpool and Chester, a trend which already exists in the Borough. Such a consequence would not be in the long-term interests of existing Warrington residents or the Borough’s economy, or be in the interests of sustainable development.

As there does not appear to be a method for revising these housing allocations in the event of the projected higher growth rate not materialising, the Council’s strategy on housing provision would seem to be a very high risk one. We therefore **strongly object** to the Council’s proposed target for new homes and suggest it would be more realistic to plan for the amount of housing required to satisfy Warrington’s Objectively Assessed Housing Need, ie. 955 homes p. a. (para. 2.8). This would involve a reduction of 3,318 in the number of new homes required in the plan period, and would significantly reduce the amount of Green Belt land that would be lost to housing development, as the total housing capacity in the urban area would not change (see Table 1, para. 4.11). In fact, it would no longer be necessary to release any of the Green Belt land in Outlying Settlements listed in the table at para. 5.46, for example.

This would mean that the housing development which does take place would be nearer the urban area or in areas which are properly served by new infrastructure, a much more sustainable form of development.

## **2. Release of Parcel LY21 from Green Belt**

We are aware from para. 5.48 that the Council will hold back detailed assessment of potential development sites in Outlying Settlements, including Lymm, until after the Preferred Development Options Stage. However, as the Council says in para. 5.50, the information published in the Council’s review of each of the “Call for” sites “will provide the starting point for identifying sites to be allocated and/or potentially safeguarded”.

In view of the above, we note with concern the recent (June 2017) Addendum Green Belt Assessment of parcel LY21 by Arup on behalf of the Council. In the initial assessment of LY21 in the original October 2016 report, Arup concluded that this parcel of land on the eastern edge of Lymm made a “strong contribution” to serving one or more of the Green Belt purposes set out in para. 80 of the NPPF. In the Addendum report Arup altered this to “moderate contribution”.

Looking at the reasons given for this change of opinion, we can see only two factors which are considered by Arup to be different following the Call for Sites responses, as the physical characteristics of the parcel have not changed in any way. These are;

### **Durable Boundaries**

Reference is made to the existence of two areas of TPO protected woodland along the eastern boundary, which had previously been thought to be unprotected and therefore not durable. The Addendum therefore concludes that the parcel’s boundaries “could contain development and prevent it from threatening the overall openness and permanence of the Green Belt”. This conclusion was reached even

though almost half (45%) of the eastern boundary has no durable features separating it from open land to the east. It cannot therefore be said that the parcel has clearly defined boundaries which use physical features that are readily recognisable and likely to be permanent, as required by para. 85 of NPPF. Future encroachment onto open land to the east is therefore entirely predictable.

### **Built Form and Openness**

The Addendum assessment refers to two residential properties (converted farm buildings) along Higher Lane and Lymm High School in the western part of the parcel. As the High School was referred to in the original assessment but the “residential properties” were not, we assume that is what has changed. The residential properties were created by conversion/ change of use of farm buildings, so nothing physical has changed. The issue seems to have arisen from the methodology employed by Arup in para. 106 of the original assessment. This says that the presence of “existing built form” within a parcel can alter the level of contribution it makes to safeguarding the countryside from encroachment. The definition of “Built form” (para. 102) is “any form of built development excluding buildings for agriculture and forestry”. The reason agricultural and forestry buildings are excluded is because they are considered by the NPPF to be “appropriate” within Green Belt (para. 106 again).

However, para. 90 of NPPF also considers the re-use of buildings in the Green Belt (as in the case here of converting agricultural buildings for residential use) to be “not inappropriate”. So, following the same policy logic, Arup should not have regarded the residential conversions as part of the built form when using the Degree of Openness Matrix in Table 5 of the original assessment report. Had they applied the methodology correctly, they should have concluded that the parcel still had less than 10% “built form”, and with the admitted long line views and low vegetation should have concluded the parcel had a “strong degree of openness”.

It is of course a matter of professional judgement, but had the policy logic been followed we are confident that the contribution would still have been classed as “strong”, and we would urge Council officers to follow through that exercise and reach the same conclusion.

Whilst carrying out that exercise we also ask that officers consider the appropriateness for the purposes of this exercise of including the buildings, hard areas and car parks of Lymm High School within parcel LY21. We appreciate it is currently washed over by the Green Belt, but as the purpose of the exercise is to examine areas of Green Belt for potential future development, it seems pointless to include within the parcel a large secondary school which will remain as such throughout the Local Plan period and well beyond.

This is an important issue because the way the parcel boundary is drawn skews the way in which Arup have applied their methodology when assessing the parcel. Using the Degree of Openness Matrix discussed above, the presence of the School buildings within the parcel boundaries means the % of “built form” in the parcel is significantly increased from less than 10% to less than 20%, changing the conclusion based on the Matrix from “strong degree of openness” to “strong-moderate degree of openness”. So, the inclusion of the School buildings has skewed the assessment and final conclusion significantly. Had it been omitted, which we believe is the more sensible course, the parcel would certainly have been assessed as making a strong contribution to the purposes of Green Belt. We are confident in saying this because

the Council's own assessment of Call for Sites Parcel R18/111 (referred to below), which does not include the High School site, is that it makes a "strong contribution" to Green Belt purposes.

We have also noted that the Council carried out its' own Green Belt Assessment of Call for Sites responses and SHLAA Green Belt sites in July 2017. One of the sites assessed is R18/111, which comprises the majority of parcel LY2, including most of the eastern boundary but not the two residential properties or the High School. The Council concluded overall that the site made a "strong contribution" to Green Belt purposes, which reinforces our view that LY21 should be similarly assessed.

We urge Council officers to consider and apply the above issues when assessing which sites to allocate or safeguard in the future Local Plan. We also ask that we be consulted on and notified of all future stages of the Local Plan process.

Yours sincerely,

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