

# **Planning Representation to Warrington Borough Council**

Land adjacent to Booths Lane, Lymm

On behalf of residents of Booths Lane

September 2017



Project name and Number:
17-030_BoothsLane_Lymm
Document Name and Revision:
17-030_rpt_001_BoothsLane_Lymm_260917
Prepared by:
[REDACTED]
Reviewed By:
[REDACTED]
Date of Issue:
29 <sup>th</sup> September 2017

# Contents

---

1. Introduction.....	4
2. Unsustainable Location of Land adjacent to Booths Lane .....	6
3. Value of the Countryside and the Green Belt .....	7
4. Alternatives .....	9
5. Conclusions.....	11

# 1. Introduction

- 1.1. This is a representation to the Local Plan Preferred Development Options document, prepared by Urban Imprint on behalf of the residents of Booths Lane.
- 1.2. Residents of Booths Lane are in opposition to potential unsustainable and inappropriate development on land adjacent to Booths Lane.
- 1.3. This land encompasses the sites identified in that area of Lymm through the 'Call for Sites' exercise (2016), notably site numbers; R18/081, R18/154, R18/113, R18/092, R19/008, R18/101 and R18/079. It also encompasses the Green Belt Parcels LY25, LY26 and LY27 (identified through in the Green Belt Assessment 2016).
- 1.4. When no other context is given, the use of the term 'the site' within this document refers to the land adjacent to Booths Lane.
- 1.5. We acknowledge that Lymm has been identified as an outlying settlement of Warrington and as such, an approximate figure of 500 new homes has been set out to be delivered in the village as part of the Local Plans 'incremental growth' scenario.
- 1.6. However, the Local Plan has not at present identified specific sites for development.
- 1.7. Following a conversation between ourselves and Warrington Borough Council, we were informed that a more than sufficient number of sites around Warrington and its surrounding settlements had been brought forward in the 'Call for Sites' exercise (carried out in 2016) that could accommodate the required housing growth (including that of Lymm).
- 1.8. Therefore, the Council felt that they had enough flexibility in site options and so it was not necessary to decide on site allocations at this point in time. This would be a matter for a later stage in the process of the Local Plan.
- 1.9. It should be noted here that there were a total of 155 sites brought forward in the Call for Sites (2016) exercise for the whole of the Borough of Warrington. Of these 155 sites, over 30 have been identified in Lymm alone.
- 1.10. This demonstrates how there are a disproportionate number of potential sites in Lymm compared to the rest of the Borough, and that additional housing in Lymm is spoilt for choice of sites. Allocating additional homes should therefore be assessed against the most suitable of sites in the most sustainable of locations.
- 1.11. We acknowledge that there is a need for growth in the Borough and that Lymm, being one of the larger settlements surrounding Warrington, will be required to take a modest yet balanced quantity of this growth. However, this growth needs to happen in the right locations in order to ensure that new development in Lymm integrate successfully within the existing community and that the village continues to thrive within itself and with neighbouring settlements.
- 1.12. With these matters in mind, we consider the land adjacent to Booths Lane to be a wholly unsustainable location for growth in Lymm, and therefore should not be considered by the Borough Council when they come to making their site allocations.

1.13. Our argument in opposition to the land adjacent to Booths Lane being allocated for growth will be set out in the following sections under three key points:

1. **The land adjacent to Booths Lymm is not sustainably located**
2. **The land adjacent to Booths Lane is considered valuable countryside and holds an important Green Belt function**
3. **There are better alternatives for growth elsewhere in Lymm**

#### **Context of the area**

1.14. The land adjacent to Booths Lane lies to the south and west of Lymm, roughly 2km from its centre. Lymm itself is a large village settlement to the east of Warrington and within its Borough.

1.15. The land adjacent to Booths Lane is an attractive undulating area of countryside, with agricultural activities prominent. The land has a tightly established network of field patterns with bordering mature hedgerows and numerous small ponds.

1.16. Massey Brook runs east to west through the middle of the site, while Bradley Brook runs south to north along the eastern edge.

#### **Green Belt**

1.17. Three Green Belt parcels adjacent to Lymm's settlement boundary were reviewed in the Green Belt Assessment (2016) and cover part of the land adjacent to the Booths Lane. The three Green Belt parcels are; LY25, LY26, and LY27. The importance of these parcels will be discussed later in this statement.

#### ***Call for Sites and the SHLAA***

1.18. Seven sites were put forward through the Call for Sites (2016) in the area adjacent to Booths Lane. Three sites were also identified in the 2015 Strategic Housing Land Availability Assessment (SHLAA).

1.19. Of the seven parcels of land put forward in the Call for Sites, only the owner of parcel 18/081 has put forward a detailed submission of any note. There has been little activity in terms of the other parcels of land in this area, with submissions to the Call for Sites only showing red outlines of the other sites with no accompanying information to back them up.

#### ***Warrington Borough Council Local Plan***

1.20. For clarity, the residents of Booths Lane do not wish to challenge the overall strategy of the Local Plan as part of this representation.

1.21. We welcome the decision of the Local Planning Authority to focus growth within and adjacent to Warrington itself as this will concentrate the majority of new development in sustainable locations.

1.22. We accept that some limited growth is needed in the surrounding rural and sub-urban settlements (Lymm included), however, we would welcome further evidence for Lymm being allocated 500 new dwellings.

1.23. We acknowledge also that the Local Planning Authority (LPA) needs some investment in their services and that some of this will take place in Lymm.

1.24. However, we believe that for the LPA to accommodate this growth effectively, careful

consideration should be made of the site allocations around the Borough.

## 2. Unsustainable Location of Land adjacent to Booths Lane

- 2.1. In this section, we will discuss how the land adjacent to Booths Lane is not sustainably located and therefore is not an appropriate location for growth of the settlement.
- 2.2. The land in question is located outside of the settlement boundary of Lymm, with only one side connecting to the existing boundary. Furthermore, this connection only touches the north-east part of the settlement boundary and therefore its relationship with the existing settlement is poor.
- 2.3. In the context of the village centre (including the main shopping and healthcare facilities), the land adjacent to Booths Lane is almost at the furthest distance possible whilst still being attached to the settlement boundary.
- 2.4. If the Lymm Cross (a recognised landmark) is taken as a point of reference for the centre of the village, the distance between this and the point of access to any of the sites adjacent to Booths Lane is somewhere between 1.5 and 1.7km (1500 / 1700 metres), which represents an unsustainable walking distance of approximately 31 minutes.
- 2.5. The furthest point away from the Cross is the extreme of the site promoted by Emery Planning and their client (under Call for Sites reference R18/081) which is in excess of 2.5km from the Town Cross.
- 2.6. It is best practice to locate sites so that shops and services should be in a 10 - 15 minute walk from all sites. The village centre contains the majority of shops and services in Lymm. A five minute walk is usually considered to equate to 400m, and so these sites should be considered to be an unsustainable location.
- 2.7. There are a range of other sites in Lymm all under 1km from the Cross and thus considered to be in a more suitable walking distance from the shops and services.
- 2.8. The land adjacent to Booths Lane is also a considerable distance from the High School in Lymm, and, whilst it is situated close to a Primary School, there is a clear lack of local services and amenities available close to the site.
- 2.9. It should be noted here that many other sites brought forward in the Call for Sites (2016) exercise lie directly adjacent to the core shops and facilities in the village, and therefore would be far more appropriate in terms of sustainability.
- 2.10. The land adjacent to Booths Lane is not currently serviced by any close public transport corridor, with the nearest bus route being along the A54 and Rush Green Road. The stops for these routes are roughly 1.5 km from the site and therefore lie an unsustainable distance away.
- 2.11. Should housing go ahead on this area of land, there is a high risk of the site becoming a self-contained community failing to integrate with the rest of the community in Lymm. The site would be dominated by car users who have no alternative means to travel to services and amenities. The result of this would be to create a dormitory community at the edge of the village

which had little interaction with the existing community in Lymm.

- 2.12. The Local Plan Preferred Option strategy acknowledges that existing facilities in Lymm will be expanded to accommodate the growth in the village. In order to effectively integrate this expansion, housing growth needs to co-locate on sites close to the shops and services.
- 2.13. Allocating new houses further afield may deter people from using Lymm's facilities in favour of shops and services elsewhere in the Borough. Local trade would suffer as a result.
- 2.14. Socially, the land adjacent to Booths Lane is a considerable distance from the hub of the community, and, as touched on previously, there would be poor integration between the new residents and the existing community.
- 2.15. Environmentally speaking, the land adjacent to Booths Lane represents valuable and attractive countryside, not only for the purpose of agriculture and recreation, but also importantly for wildlife and the biodiversity of Lymm and the wider Borough of Warrington.

### 3. Value of the Countryside and the Green Belt

#### **The Countryside**

- 3.1. The land adjacent to Booths Lane lies within open countryside in the rural landscape surrounding the south of Lymm.
- 3.2. Notwithstanding any planning policy designation, collectively this land is afforded with uninterrupted extensive views over the Cheshire Countryside.

- 3.3. From a landscape and character perspective, these fields and their relationship with the settlement of Lymm make an important contribution to the setting of the village. The erosion of this through development would have serious landscape and visual impacts on the wider settlement character.
- 3.4. Mature hedgerows - important for nesting birds and animals - border the fields which dominate the landscape, and numerous mature trees and groups of trees are present around the area.
- 3.5. The land to the south of Booths Lane is also prominent with small ponds and water ways (notably Massey Brook running through the middle of the site), which provide ecological value for the local wildlife and improve the overall biodiversity levels in the area.
- 3.6. These ponds would also be prime candidates as potential habitats for populations of Great Crested Newts, which are a protected species under UK and European legislation. The environmental value of the land would therefore be much higher than in alternative locations in and around the village.
- 3.7. Indeed, other areas within Lymm are far less constrained by environmental factors (for example, the sites to the north and east of Lymm identified within the Call for Sites). This further emphasises the unsuitability of the land adjacent to Booths Lane for delivering Lymm's housing growth.
- 3.8. The landscape is known to support a number of other protected species, including birds (Lapwing, Buzzard and Barn Owl) as well as a number of smaller mammals, including bats and the Brown Hare, which benefit from the mature and historic pattern of fields, trees and

hedgerows. The loss or erosion of this countryside is likely to have a significant impact on these species, and whilst mitigation may be possible, the protection and preservation of the landscape 'in-situ' should be a strong consideration against releasing this site for development.

- 3.9. The land adjacent to Booths Lane is not visually related to the existing built up area of Lymm due to its rural characteristics and distance from the main urbanised areas of the village.
- 3.10. Notwithstanding the Green Belt, developing in this area would cause urban sprawl, resulting in significant landscape impacts from the creation of a new built edge on three sides of the site.
- 3.11. Other potential sites around Lymm are far better related to the existing built environment of the village. The expansion of the edges of the settlement for these sites would be far less impactful on the surrounding landscape and on Lymm's setting.

### **Green Belt**

- 3.12. We support the Local Planning Authority's Green Belt Review classification and its findings, which should support the Council in making appropriate choices in the site allocations.
- 3.13. The Green Belt Review assesses parcels of Green Belt next to existing settlements against the five 'purposes' of the Green Belt, as set out under paragraph 80 of the National Planning Policy Framework (NPPF). These five purposes are;
- 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 special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land

3.14. The Green Belt Assessment identifies parcels LY25 and LY26 (which lie adjacent to Booths Lane) as having a strong contribution to the purposes of the Green Belt. These two parcels therefore represent important areas of Green Belt land around Lymm and demonstrates the inappropriateness of developing on them.

3.15. We do question some of the ratings given to the Green Belt parcels surrounding Lymm, outlined below:

3.16. Under the first purpose of the Green Belt (to check the unrestricted sprawl of large built-up areas) all three sites adjacent to Booths Lane (LY25, LY26, and LY27) have been labelled as having 'no contribution' in the Green Belt Assessment. We would argue here that, as Lymm has over 5000 houses within its settlement, it should almost be considered a small town, and therefore it is disingenuous to not consider Lymm's growth as contributing to urban sprawl (especially since Lymm is targeted for expansion). At the very least, we consider that this rating should be 'moderate' for each of the three parcels mentioned.

3.17. Under the second purpose to the Green Belt (to prevent neighbouring towns merging into one



another) we take issue with the assessment giving a 'weak' or 'no contribution' for parcels LY26 and LY27. Whilst at present, we could agree with these ratings, the presence of the proposed 'Garden Suburb' across the M6 will narrow the Green Belt gap between Warrington and Lymm to just the land east of the M6. This would significantly increase the contribution that Green Belt parcels LY26 and LY27 had in preventing merging of settlements.

- 3.18. Notwithstanding the above consideration, the Green Belt parcels LY25, LY26, and LY27 represent only part of the Green Belt land around Booths Lane. The additional Green Belt land beyond these parcels was not included in the Green Belt Assessment due to them having no relationship with the settlement boundary.
- 3.19. This unassessed Green Belt land would hold even greater importance in upholding the purposes of the Green Belt than those of the assessed Green Belt parcels, due to their distance from the established settlement border. This further reinforces how it would be totally inappropriate to allocate growth on the sites adjacent to Booths Lane.
- 3.20. In response to Emery Planning's representation on site 18/081 in the Call for Sites (2016), they state that, as Green Belt parcel LY26 has a 'weak' and 'no contribution' under three of the purposes for Green Belt, the overall contribution should not be 'strong'.
- 3.21. In our professional opinion, it is not about averages; if a strong score is given in one of its purposes, it clearly reflects the parcel being strong in meeting that purpose of the Green Belt, and so irrespective of the other purposes, it should be considered to have an 'overall' strong rating.

- 3.22. Many of the parcels assessed in the Green Belt Assessment make 'no contribution' or a 'weak' contribution to two or more purposes of the Green Belt, and so to say that all of these sites in Lymm were weak overall would not be an appropriate assessment methodology in the Green Belt Review. This approach would not be consistent with the purpose of the Green Belt and the principles of including land within it.
- 3.23. The assertion by Emery Planning that the value is 'moderate' is incorrect, based on the evidence presented in the Green Belt Assessment and the approach set out in the NPPF as to the purposes of including land within the Green Belt.
- 3.24. We see no justified reason to depart from the scores given by the Green Belt review in this respect. In fact, we think that the evidence presented justifies that this land within LY25, LY26 and LY27 is even more important when measured against the Green Belt purposes.

## 4. Alternatives

- 4.1. It is worth reiterating the Council's position that they themselves have said that they have more than enough potential sites to deliver the 500 homes in Lymm as part of their growth strategy. Therefore, there is a high flexibility in site choice and so only the most suitable of sites around Lymm should be brought forward at this time.
- 4.2. A planning balance should be struck when choosing the best available sites to deliver growth around Lymm. The Council needs to consider matters such as sustainability of the site, its relationship to the existing community and settlement, and the impacts it would have on the Green Belt.

4.3. There are numerous potential sites around Lymm identified through the Call for Sites (2016) which would be significantly more appropriate for growth of the village than the sites identified adjacent to Booths Lane.

4.4. We encourage the LPA to use the following indicators in determining the most suitable sites in Lymm;

- Being in close proximity to services, especially shops and healthcare facilities
- Being situated next to or nearby public transport corridors
- Being in lesser value Green Belt parcels
- Being better related / integrated with the existing settlement boundary
- Having fewer potential ecological issues than other sites
- Are bounded by development on two or more sides
- Being more reflective of guidance in the National Planning Policy Framework (certainly the core planning principles)

4.5. Even if all of the above factors are taken into account, this would still leave 10 or more sites that are considered better than the sites on the land adjacent to Booths Lane. These more suitable sites include those in the centre, north, and east of Lymm.

4.6. There have been local political assertions that the determining factor for allocating sites in Lymm should be in maintaining the separation of smaller 'suburbs' of Lymm (including Heatley, Oughtington and Broomedge) with Lymm village.

We disagree with this position and set out our case below:

4.7. The settlement boundary for Lymm is currently contiguous with the smaller adjoining settlements and thus in planning terms, represents one unit. We do acknowledge that boundaries of Oughtington and Lymm are shown as two separate elements which touch on Rush Green Road. Further to this, the emerging Local Plan identifies Lymm and the smaller 'suburb' settlements as being one settlement and the mapping for the possible sites includes sites around the entire urban area of 'Lymm'.

4.8. Between both settlements there are some large developed sites that are outside of the settlement boundary and in the Green Belt. These sites are significantly developed and including, amongst other development elements, two schools (including the large High School site) and a large industrial area south of Rush Green Road. Therefore, visually there is not really a separation at all. As a result, although there may be a perceived separation, in policy terms, visual terms, and in physical development terms, this is not the case and should be afforded little weight in the decision making process.

4.9. We agree in part, that some of the areas close to the centre ought to properly be preserved because of their Green Belt score or because of their proximity or inclusion within the Conservation Area (and thus part of the historic setting). However, we still consider that there are a number of sites here which could accommodate new homes.

4.10. The Green Belt review considers 'merging' of settlements as part of its overall assessment. This matter should in turn be considered as part

of any decision making process, so long as the parcels are assessed against the five purposes.

- 4.11. Further to this, the merging of the smaller settlements is only one consideration in ensuring that we deliver sustainable development. To focus purely on this matter within the decision making strategy is misguided and likely to undermine the delivery of sustainable development as outlined by the NPPF. The strategy we propose is much more strategic and comprehensive in its overall approach to wider sustainability.
- 4.12. We trust the Council to follow these considerations as they develop their strategy and allocations for Lymm.

land around Lymm, notably its high abundance of small ponds, mature hedgerows, and its tranquil and attractive surroundings.

- 5.5. Over 10 alternative sites around Lymm are considered to have significantly better potential for development in terms of their closeness to the centre, their environmental impacts, their sustainability etc. These sites could easily accommodate the 500 homes set out for Lymm.
- 5.6. We expect the Borough Council to make careful considerations in their choice for site allocations and to take on board the issues raised within this document with respect to the unsuitability of the land adjacent to Booths Lane.

## 5. Conclusions

- 5.1. Lymm has a high flexibility in the sites that can be chosen in order to accommodate growth in the village. Therefore, sites should only come forward where it has been shown that no others are more suitable.
- 5.2. The land adjacent to Booths Lane is a wholly unsustainable area for growth of Lymm, being far from the majority of key services and facilities, as well as having a poor relationship with the existing settlement boundary.
- 5.3. The Green Belt Assessment (2016) states that two of the three Green Belt parcels within the land adjacent to Booths Lane have been given an overall rating of 'Strong' while a third parcel is 'Moderate', emphasising their importance in upholding the key purposes of the Green Belt.
- 5.4. The land adjacent to Booths Lane has significant environmental qualities over other parcels of



Urban Imprint Limited  
16-18 Park Green  
Macclesfield  
SK11 7NA

01625 265232  
[info@urbanimprint.co.uk](mailto:info@urbanimprint.co.uk)  
[www.urbanimprint.co.uk](http://www.urbanimprint.co.uk)