



Dear Warrington Borough Council

Please take this as a formal objection to the release of the above mentioned parcel of land (R18/076 or SHLAA2901) from the Green Belt.

We agree and support all comments made in the attached documents:

- "17-09-28jsb Warrington Local Plan Review Ltr.pdf"
- "Final representationl.pdf"
- "representations on behalf of residents opposing proposed alterations topdf"
- "749_500_P_REPORT_170927.pdf"

We also have concerns with any development on the above mentioned parcel in terms of Highways as per below:

"Crouchley Lane

Narrow country lane which is not suitable for serving a development of the above mentioned parcel:

- 1 St Mary's Pre-school on Crouchley Lane (building at the entrance of the car park for the dam): Safety concerns arising from the presence of young children. Also increased traffic pollution concerns.
- 2 Width of the road - free flow of traffic would be impaired - cars would not be able to be parked on the road - a traffic enforcement order would have to be implemented by law stating people would not be able to park on the lane between 7am - 7pm.
- 3 Significant increase in flow/level of traffic on road that essentially goes to nowhere as beyond is just a network of country lanes. There is a definite danger that traffic will turn left out of the site and use these narrow lanes as a shortcut to the motorway network.

Site Access

- 1 Right turn off Crouchley onto Higher Lane - although there may be sufficient width for a filter lane it does present an issue due to volume of traffic especially in peak periods.
- 2 Main vehicular Access on Crouchley Lane - as presented, would not have visible splays - too narrow for safe exit / egress from the site.
- 3 Proposed emergency access road to site opposite Woodlands Avenue is 'off set' from Woodlands Avenue - would not have good visibility for exit. Significant highways work to be undertaken to make it a safe junction. There is also a question mark over its current width for emergency vehicles.

Pedestrian access from Tower Lane

Residents of the new development walking towards Lymm village using Tower Lane instead of Crouchley Lane would encounter a public foot path at the side of Lymm Water Tower which does not have sufficient width for wheelchairs/ prams/ buggy's."

Many thanks

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



EllisWilliams
Architects

Warrington Borough Council
Planning Policy and Programmes
New Town House
Buttermarket Street
Warrington
Cheshire
WA12NH

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

Ref/Marketing

28/09/17

Dear Sirs,

Following detailed consideration of the Regulation 18 Consultation of the Warrington Local Plan Review, we wish to make the following representation:

As architects of the Lymm Water Tower, we are deeply concerned at the proposal to remove the area of land adjacent to this major landmark from the Green Belt.

Both the Arup Green Belt Assessment of 2016 (Parcel LY22) and the Warrington Green Belt Assessment 2017 (Parcel R18/076) identified the parcel of land in question as providing a 'strong contribution' to the Green Belt. The fundamental aim of Green Belt Policy is to 'prevent urban sprawl by keeping land permanently open'.

Whilst not disputing the assessment and need for new housing in the Lymm area, it is our contention that only in truly exceptional circumstances land deemed to provide a 'strong contribution' to the Green Belt be considered for removal from the Local Plan, making way for potential new development. We fail to see in this context how the above land in question might justifiably be deemed 'appropriate'.

In addition, the National Planning Policy Framework makes it clear that the significance of heritage assets can be 'harmed through development within their setting'.

It is in this context, and as architects of the Water Tower redevelopment, we object strongly to the proposed removal of this land from the Green Belt and its release for residential development. The Water Tower is one of only a few significant historic landmarks within the Lymm area and as such constitutes a major element in townscape terms.

We are reminded of the particular attention afforded by English Heritage during the conversion of the Water Tower to the importance of this Grade II Listed Landmark. The interest given not only to the design of the Tower but its impact on its setting formed a key aspect of the design response. Views both to and from the Tower were seen as critical in maintaining its integrity and in respecting its importance as a key feature in the Lymm landscape.

London
135 Curtain Road
Shoreditch
London
EC2A3BX
Phone: +44(0)20 7841 7200

Berlin
Clausewitzstraße 1
10629 Berlin
Phone: +49 (0)30 887 14 331

Liverpool
Vanilla Factory
39 Fleet Street
Liverpool
L1 4AR
Phone: +44 (0)151 708 1802

Manchester
3rd Floor
16-18 King Street
Manchester
M26AG
Phone: +44 (0)161 3596797

www.ewa.co.uk
info@ewa.co.uk

Company Registered in
England, no. 3818904

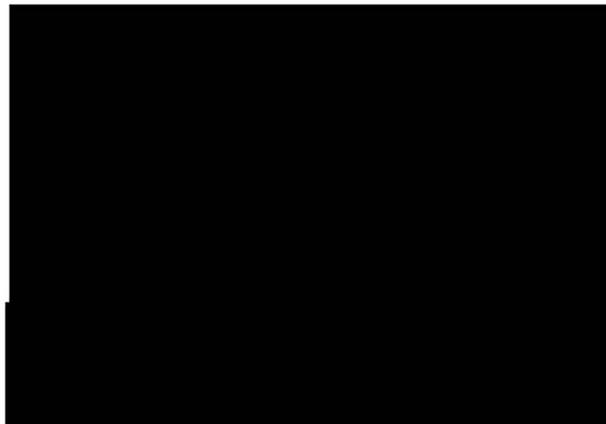
Warrington
Wellfield
Chesler Road
Preston Brook
WA73BA
Phone: +44 (0)1928 752 200



EllisWilliams
Architects

The Tower received numerous design and conservation awards including an RISA Award for outstanding design and in recognition of its contribution to the local built environment. Any residential development on the land in question would have a hugely negative impact on this unique Listed building.

To conclude, we consider the 'strong contribution' made by the land in question to the Green Belt and the potential visual impact on the historic Water Tower should this be removed from the Local Plan to be totally unacceptable. We contend that this is contravention of both NPPF Policy and Warrington Borough Council's own Green Belt Assessment criteria for justifying removal of land from Green Belt for development purposes. We would urge the Council to ensure this area of land remains within the Green Belt for the mutual benefit of the people of Lymm, in recognition of the Water Tower's heritage value and the significant role played by this unique building in townscape terms.



London
135 Clerkenwell Road
Shoreditch
London
EC2A3BX
Phone. +44(0)20 7841 7200

Berlin
Clausewitzstraße 1
10629 Berlin
Phone. +49 (0)30 887 14 331

Liverpool
Vanilla Factory
39 Fleet Street
Liverpool
L1 4AR
Phone +44 (0)151 708 1802

Manchester
3rd Floor
16-16 King Street
Manchester
M26AG
Phone. +44(0)1613596797

W\W.ewa COLK
info@ew.a.co.uk

Compactly Registered in
England, no, 3818904

Warrington
Wellfield
Chesler Road
Preston Brook
WA73BA
Phone. +44 (0)1928 752 200

**WARRINGTON LOCAL PLAN REVIEW
PREFERRED DEVELOPMENT OPTION CONSULTATION**

**Land east of Crouchley Lane, Lymm
Green Belt Parcel LY22
SHLAA reference 2901
Call for sites reference R18/076**

**Representation on behalf of residents of Higher Lane, Manor Road,
Tower Lane and Crouchley Lane in respect of possible removal of land
from the Green Belt for residential development**

INTRODUCTION

The Council is currently consulting on its Local Plan Preferred Development Option which sets out the proposed approach to meeting Warrington's need for new homes and jobs up to 2037.

The Preferred Development Option includes the managed release of Green Belt land. The Council considers that the Indicative Green Belt capacity for Lymm is 500 homes. A large number of sites have been put forward relative to the level of growth required and the Council has decided to hold back detailed site assessment work to confirm the individual sites to be allocated until after the preferred development options stage

The Council has however undertaken an initial review of the call for sites in terms of their land use characteristics and Green Belt performance.

The Council commissioned Ove Arup and Partners (Arup) to carry out a Green Belt Assessment. The final report was published on 21 October 2016. A further report, Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) was published in July 2017.

This representation relates to land east of Crouchley Lane which has SHLAA reference 2901 and is within Green Belt General area GA8 and parcel LY22 as identified in the Arup report. It has call for sites reference R18/076.

The site was put forward by landowners and a supporting statement was submitted by Berrys dated 5 December 2016. The site which measures some 13.4 ha and makes up approx 19% of the total area of parcel LY22 is put forward as being able to accommodate 240 dwellings.

ISSUES/CONCERNS

Several Warrington Local Plan policies support residents concerns and these are referred to below as appropriate

Green Belt

The Arup report concludes that parcel LY22 within which the site lies makes an overall strong contribution to the Green Belt. The residents agree with this assessment.

Furthermore, the residents' strong view is that the smaller site, 2901, also makes a strong contribution to the Green Belt for the same reasons, in particular that the site makes a strong contribution towards safeguarding the countryside from encroachment. It also contributes to the openness of the area, landscape character and enjoyment of the rural surroundings. The site is identified in the Council's SHLAA as being a constrained site due to Green Belt policy.

There are parcels in Lymm that are assessed as making a weak contribution to the Green Belt and these should be considered first, followed by those that make a moderate contribution. Sites that make a strong contribution should not be considered. This is consistent with the position taken by the Council in the Settlement Profile for Lymm published in July.

In respect of safeguarding the countryside from encroachment the Berrys report suggests that the site makes only a moderate contribution for the reasons that there is existing residential development on 2 ½ sides of the site; a woodland copse on the eastern boundary would contain encroachment in the long term; and the level of containment weakens the contribution made to safeguarding the countryside from encroachment.

It is considered that this argument is flawed in that there is a far wider open boundary marking the south of the site. Arup's assessment is that hedge and tree lined field boundaries are not durable and could not prevent encroachment beyond the parcel if the parcel were developed. The small copse should not be seen as a durable barrier that would prevent encroachment. The release from Green Belt and development of site 2901 would not prevent further encroachment in the future.

The residents support the Council's assessment that parcel LY22 makes a strong contribution to the Green Belt. Site 2901 also makes a strong contribution to the Green Belt fulfilling the fundamental aim of the Green Belt under paragraph 79 of the NPPF in protecting the openness of the Green Belt, as has been confirmed in the Green Belt Assessment of Call for Sites Responses published in July under which Site 2901 is labelled R18/076. Residents strongly disagree with Berrys attempts to diminish the contribution that this site makes to the Green Belt.

Strategic Objective W2 seeks to maintain the permanence of the Green Belt and the character of the countryside in the borough and protect them from inappropriate development.

Paragraph 6.20 of the Core Strategy states that the integrity of the Green Belt, which was established within the borough for the first time in 2006, is to be preserved across the entirety of the plan period and beyond. National policy makes clear that the fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are therefore their openness and their permanence. Paragraph 6.23 states that Sufficient contingencies are in place within the Local Plan Core Strategy to ensure that the protection of the Green Belt is sustainable in the longer term. The approach does not compromise growth aspirations during or beyond the plan period.

Policy CS 3 Overall Spatial Strategy - Maintaining a 10 Year Forward Supply of Housing Land sets out that should monitoring indicate that an on-going, 5 years' deliverable and a subsequent 5 years' supply of developable housing land can no longer be sustained or where it can be demonstrated that housing

need cannot be met within Warrington, the Council will review its housing land provision, and bring on-stream additional housing sites as required, with priority given to encouraging the reuse of previously developed land and avoiding sites in the Green Belt where possible.

This policy still applies and there should be no change to the approach set out in CS5 Overall Spatial Strategy - Green Belt, that is the Council will maintain the general extent of the Green Belt for as far as can be seen ahead and at least until 2032, in recognition of its purposes: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

That policy sets out that there is therefore no need to review Strategic Green Belt boundaries during the plan period.

Notwithstanding any changes in requirements for new housing this approach should still apply and every effort should be made to avoid removal of land from the Green Belt. If this is unavoidable, only those sites that make a weak contribution to the Green Belt should be released, not those making a strong contribution as is the case with this site.

Landscape character and rural environment

Core Strategy Policy QE7 - Ensuring a High Quality Place seeks to maintain the landscape character and, where appropriate, distinctiveness of the surrounding countryside.

Policy CC 2 - Protecting the Countryside sets out that development proposals in the countryside which accord with Green Belt policies set out in national planning policy will be supported provided that; the detailed siting and design of the development relates satisfactorily to its rural setting, in terms of its scale, layout and use of materials; they respect local landscape character, both in terms of immediate impact, or from distant views; unobtrusive provision can be made for any associated servicing and parking facilities or plant, equipment and storage; they relate to local enterprise and farm diversification; and it can be demonstrated that there would be no detrimental impact on agricultural interests.

Should the site be removed from the Green Belt there are concerns about the impact of development on the landscape character of the area and in particular its rural characteristics.

As well as the obvious impact on local and from distant views of a large number of houses with associated garages, outbuildings, walls and fences etc, a significant factor would be the creation of a new access to Crouchley Lane. Notwithstanding highways and safety concerns, such a new access, designed to be suitable to serve 240 homes, and no doubt including loss of

hedges and trees, introduction of street lights, pavements etc would introduce a significant urban characteristic into a narrow rural lane adversely affecting its character and the approach to this side of Lymm. Extensive car parking areas and other hard surfaced areas associated with the development of 240 homes would detract from the visual amenity of the area.

The Council has in its Core Strategy set out a number of objectives and policies in relation to securing a high quality environment. These include GI1:-

Identity, conserve, diversify and where appropriate extend the existing multi-functional network of green infrastructure in the urban and rural areas of the borough to maximise its value in providing opportunities for: space and habitat for wild flora and fauna and access to nature for people improving health and well-being through providing opportunities for relaxation to lower stress levels and providing access to both informal and formal sport and recreation for exercise, climate change adaptation through for example protecting the integrity of natural systems and processes, flood alleviation, cooling urban heat islands and the production of energy crops supporting economic development by providing attractive environments to contribute to inward investment opportunities for environmental education, local food production through allotments, private gardens and agriculture

The release of the site from the Green Belt and its development for housing would reduce potential habitat, would reduce peoples' enjoyment of the public right of way that crosses the site and so reduce its contribution to health and well-being, it would remove agricultural land and so reduce opportunities for local food production.

Such development would be contrary to Policy QE3 on Green Infrastructure and Policy QE6 Environment and Amenity Protection.

A further Objective (Objective T10) seeks to ensure that opportunities are taken to extend and enhance the existing public rights of way network. Development of the site would detract from enjoyment of and discourage use by locals and visitors who currently use the route for recreation and exercise. Regular users of the route include rambling groups, individual runners and walkers with pets and Lymm running Club.

Berrys report makes no significant reference to the enjoyment gained by the use of the right of way across the site and the impact of any large scale residential development on this enjoyment.

A separate consultants report will be submitted in respect of the impact of such a development on landscape character.

Agricultural land

The Agricultural Land Classification system classifies land into five grades, with Grade 3 subdivided into Subgrades 3a and 3b. The best and most

versatile land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of NPPF). This is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non food uses such as biomass, fibres and pharmaceuticals. Current estimates are that Grades 1 and 2 together form about 21% of all farmland in England; Subgrade 3a also covers about 21%.

The Agricultural Land Classification maps (including for the North-West) show Grades 1-5 but Grade 3 is not sub-divided. The site at Crouchley Lane is identified as Grade 3 land on the map for the North-West.

The ALC gives a high grading to land which allows more flexibility in the range of crops that can be grown (its 'versatility') and which requires lower inputs, but also takes into account ability to produce consistently high yields of a narrower range of crops.

This site has regularly produced a range of crops including:- potatoes (currently being harvested); wheat; peas; barley; rapeseed oil; soya bean and sugar beet. As such it could be considered to be Grade 3a land ie among the best and most versatile land. National and local policy would support the protection of such land from development. A fuller, more detailed assessment of this would be required and it is wrong for Berrys, without such an assessment, to conclude this isn't land that should be protected.

Access issues

The narrow lane is not suitable for a significant increase in traffic, there are sharp bends in the road and frequent on-street parking associated with the rugby club. The width of the road is inadequate for proper access arrangements which would likely require the removal of mature trees and hedging along the lane. There are concerns for pedestrian and highway safety arising from an increase in traffic on the lane.

An increased number of pedestrians, especially school children using the secondary access to Higher Lane again gives rise to safety concerns. There is only the possibility for one access to the site and there are concerns that this is not sufficient for a development of this size. The adequacy of the secondary access for emergency vehicles is a cause of concern especially as this will be shared with pedestrians.

The development would be contrary to Policy QE6 in respect of highways and traffic issues.

A separate consultants report will be submitted in respect of highways issues associated with a potential development of the site.

Residential amenity

As well as concerns about the immediate impact on the amenities of adjacent residents of a new housing development – privacy, overlooking,

overshadowing etc, there is also the issue of increased pedestrian activity along the public right of way and Tower Lane causing increased noise and disturbance and security concerns for residents.

Such detrimental impacts would be contrary to Policy QE6 of the Core Strategy.

Trees and hedgerows

There is concern about the potential loss of trees and hedgerows especially along Crouchley Lane resulting in harmful impact on biodiversity and rural character. A residential development of the site would not be likely to adequately incorporate trees and hedgerows to offset the harmful visual impact of such a development.

Setting of listed building

The development whilst not directly affecting the listed water tower adjacent to the site, would impact on its setting and in particular its landmark quality as a feature on the edge of the village

Drainage

The development of this site would result in a significant increase in hard surfacing and increased surface water run-off . There are already small areas at surface water flood risk as identified in Berrys report and adding to this would be contrary to national and local policy.

Ecology

Whilst not an identified protected site it cannot be assumed that there would be no impact on biodiversity in general or protected species in particular. The development of the site would potentially have an impact on protected species that have been seen in the area such as bats and lapwings. The presence of nearby ponds to the east also suggests that there may be issues of concern in respect of amphibians.

CONCLUSION

As well as Green Belt issues the potential development of the site raises numerous other concerns such that it would be contrary to national and local plan policies. Such development would not be sustainable and accordingly the land should not be considered for release from the Green Belt either individually or as part of LY22.

■

DOC REF: 749/LYMM/170927

APP: SHLAA Site 2901/GB Parcel LY22

Land East of Crouchley Lane, Lymm

Landscape and Visual Representations on behalf of residents of Higher Lane, Manor Road, Tower Lane and Crouchley Lane in respect of possible removal of land from the Green Belt for residential development.

By Xanthe Quayle BSc (Hons) DipLA CMLI

September 2017

**CAMLIN
LONSDALE**

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I. INTRODUCTION

- I.1 Camlin Lonsdale were commissioned by the residents of Higher Lane, Manor Road, Tower Lane and Crouchley Lane on 22nd September 2017 to undertake a high level assessment of the landscape and visual matters relating to SHLAA site reference 2901/Green Belt Parcel LY22 aka Land East of Crouchley Lane, Lymm. These residents constitute our client and a full list is provided at Appendix I. This statement considers, from a landscape and visual perspective, the baseline conditions of the site. It then assesses the potential effects of housing development should the site be allocated as part of the Warrington Local Plan Review process. In particular the potential effects on the Green Belt. It has been undertaken with reference to Good Practice including GLVIA 3 and related guidance.
- I.2 Camlin Lonsdale is an established landscape practice (of over 20 years) with a pedigree in regeneration, masterplanning, strategic land planning and design. The studio, based in Slaithwaite, West Yorkshire, comprises a technical and administrative team totaling six in number. Landscape assessment and landscape planning, design, construction and management of development at all scales have been, and continue to be, a major feature of the work of the practice.
- I.3 Xanthe Quayle, the author of this document, is a chartered Landscape Architect and the Managing Director of Camlin Lonsdale Landscape Architects who holds a Bachelor of Science degree with Honours and a Post Graduate Diploma in Landscape Architecture from the University of Sheffield.
- I.4 Xanthe provides regular expert witness services and has relevant experience with regards to the matters central to this report; that is assessing effects of housing development in the Cheshire landscape, through her involvement , inter alia, in the Hassall Road, Alsager Appeal Hearing (APP/R0660/A/12/2188001) in 2013, a conjoined Appeal Hearing for Land off The Moorings & Land off Goldfinch and Kestrel Close (APP/R0660/A/12/2188604 & APP/R0660/A/12/2188605,) at Congleton, also in 2013, and 92 Macclesfield Road, Holmes Chapel (APP/15/2992C) in 2016. All cases considered the effects of small - medium residential development on landscape character and visual amenity. Her cv with regards to expert witness services is provided at Appendix I of this report.
- I.5 Xanthe visited the site on 22nd September 2017 and on satisfying herself that there was a case to be made against the proposal for development, accepted the commission and

submits this evidence in support of local residents.

- I.6 In accordance with GLVIA 3 Landscape and Visual Assessment is a tool used to identify and assess the importance of effects of change resulting from development in both the landscape as an environmental resource in its own right, and on people's views and visual amenity. The objective is to provide the competent authority with relevant information to enable them to take a site specific decision on development in full knowledge of the scheme's likely effect on the landscape and visual amenity.
- I.7 This report intends to provide a strategic assessment of potential landscape and visual effects arising from housing development at the Land East of Crouchley Lane site to assist with the Local Plan review process.
- I.8 The structure of the report therefore includes the consideration of both landscape and visual matters, from baseline and sensitivity to change, to likely effects of housing development. The report then goes on to consider the findings of the Warrington Green Belt Assessment for SE Lymm and concludes with a balanced assessment of likely effects of the release of the site in question from the Green Belt.
- I.9 Throughout this report reference to the site or Land East of Crouchley Lane means that part of LY22 north of Crouchley Hall Farm and west of 88 Higher Lane or in other words SHLAA site reference 2901 as promoted by Berrys Planning in their submission Project Reference SA22033.
- I.10 The following publications/information sources were consulted as part of this assessment:
- Warrington Borough Council Landscape Character Assessment (2007)
 - Cheshire Landscape Character Assessment (2008)
 - Lymm Village Centre Conservation Area Statement
 - Warrington Borough Council Green Belt Assessment (21 October 2016)
 - Warrington Online database (mapping.warrington.gov.uk)
 - MaGlc (<http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>)

2. LANDSCAPE MATTERS

Baseline

- 2.1 The site does not sit within or near any landscape designations at a national or regional level. However, and with reference to the Warrington Borough Council Landscape Character Assessment (WBC LCA) (2007) the site is included in Type 3 Red Sandstone Escarpment Area 3C Lymm where it is identified as having 'a high quality landscape...sensitive to changes in agricultural practices and development'. The site is also influenced by the characteristics of Arley LCA which is within the Lower Farms & Woodland landscape type of the Cheshire LCA (2008).
- 2.2 Type 3 encompasses the entire settlement of Lymm with the exception of the northern extents of the village where the landscape is more closely associated the river plain and the Manchester Ship Canal (Type 5). The description highlights the strong feeling of high landscape quality and distinctive nature of the red sandstone vernacular architecture. The importance of the secondary sandstone ridgeline (from the main red sandstone escarpment) between Broomedge and Lymm at 60-55m is also identified. The south facing slopes of the Land East of Crouchley Lane forms an important part of this natural, prominent feature in the landscape. Urban influences are noted as limited.
- 2.3 Within the character description the LCA identifies the Victorian Villas along Higher Lane – the main Warrington to Altrincham Road – as key cultural elements of the landscape. We would note that whilst key characteristics of 3C Area are generalised as 'its small scale, more intimate rural character, luxuriant vegetation and restricted views' this is not the case in the context of Land East of Crouchley Lane. Here the loss of hedgerow boundary's combined with the sloping ground of the secondary escarpment result in a prominent site in the landscape with an open character and far reaching views towards High Legh and the wider Cheshire Plain.
- 2.4 The Conservation Area Statement for Lymm Village Centre (designated 1971) articulates that 'the settlement of Lymm is situated in an area of unspoilt rural scenery to the east of the Borough in the north of Cheshire with the Manchester Ship Canal lying to the north. The Bridgewater Canal, constructed by James Brindley, passes close to the centre of Lymm and a picturesque lake was created to the south when the Bradley Brook was dammed almost a hundred years ago to allow the Warrington Road to cross the ravine'. Central to the character and appearance of the conservation area is therefore its rural setting. The buffer zone of the designation extends into the site and

its related skyline, which includes St Mary's Parish Church as well as Lymm Water Tower are distinctive features in long views from the Green Belt and on approach to the village from the south.

- 2.5 In the context of the conservation area and settlement threshold/ approach from the south (up the escarpment) the following locally and statutory listed structures combine to form this distinct and historic settlement edge; Church of St Mary Virgin (Grade II) Lymm Water Tower (Grade II) Lymm Baptist Church (LL) 58 Higher Lane (LL) and 64-66 Higher Lane (LL); red brick Victoria Villas along Higher Lane.
- 2.6 These buildings sit 'in the landscape' beyond the crest of the escarpment, screened by it to some degree. As such modern development at Manor Lane has not degraded the settlement edge to any significant degree and the historic buildings, including view to St Mary's parish church are clearly read with its relationship to the rural hinterland.
- 2.7 Review of early OS maps (1849) highlights the longevity of the landscape pattern around the site, that is woodland copses and hedgerow lined lanes associated with Crouchley Lane and (the former) Beechwood Hall. This raises the possibility that these hedgerows may constitute 'historic hedgerows' as determined through the Hedgerow Regulations (1997) and as such should not be lost, although clearly more detailed site assessment work is required to confirm this.
- 2.8 Whilst no national or regional PROWs pass within or adjacent to the site the public footpath linking Crouchley Hall Farm with the Lymm Water Tower has an important 'stepping stone' role for linkage into the wider network to the south, via minor lanes and footpaths, over the M56 to the rural landscapes around High Legh.
- 2.8 In terms of nature conservation assets within the locality the Bradley Brook Valley is significant in terms of deciduous woodland, including ancient semi natural woodland of SBI and SINC status. As such is likely to support protected species as well as habitat. Whilst none of these assets are within or immediately adjacent to the site the importance of linkage for green infrastructure purposes is self evident.
- 2.9 Two Tree Preservation Orders (TPOs) are associated with the site; a group at Lymm Water Tower and a copse east of 86 Higher Lane.

Sensitivity to change (including value and susceptibility)

- 2.10 The Warrington LCA identifies the 3C character area as being of high landscape quality. In fact the locality was included in the Area of Special County Value up until its recent removal from planning policy.
- 2.11 The locality is also valued for its recreational opportunities; its minor lanes and routeways are well used for a wide variety of users due to easily accessed from the settlement. The landscape value is therefore judged as medium.
- 2.12 In terms of susceptibility to change, and housing development in particular, due to the prominence of the south facing slopes of the escarpment associated with the Land East of Crouchley Lane site, and the distinctive nature of this natural feature, it is assessed as medium to high.
- 2.13 Overall sensitivity is therefore determined as medium - high

Likely Landscape Effects of Housing Development

- 2.14 Effects related to the allocation of this site for development are likely to include:
- Potential loss of vegetation including possible historic hedgerow loss and mature tree cover associated both with Crouchley Lane and related TPOs.
 - The regrading of levels to provide building plots and site access will result in the loss of a distinctive landscape feature
 - The introduction of uncharacteristic elements including access infrastructure, street lighting and mains services; introduction of new residential buildings set within landscaped plots including off road parking; traffic intrusion arising from proposed development; Light intrusion arising from proposed development;
 - Outwith the site confines it is evident that any access works to Crouchley Lane will significantly alter the rural character and historic approach/threshold to the village.
 - Wider indirect effects on landscape character and visual amenity arising from the above (direct) effects including the loss 'of reading' of historic settlement edge and of locally distinctive built and landscape features.
- 2.15 The proposal would result in permanent alteration to the landscape, the size, scale and nature of which is inconsistent with the existing character of the locality. An extensive tract of open arable landscape would be lost, and whilst it may be that it is set against the existing developed edge of settlement, due to the prominence of the site and the distinctive nature of the sandstone escarpment, significant landscape effects are likely to

arise. Furthermore, whilst there would be no direct impact on statutory heritage assets the cultural and historic character to the area would be diminished because the distinctive historic built forms and skyline are likely to be concealed by modern development above the crest of the escarpment.

- 2.16 In summary landscape effects are expected to be moderate - major adverse and are unlikely to be mitigated through design.

3. VISUAL MATTERS

Baseline

- 3.1 The prominence or otherwise of the proposed site within the landscape is a key consideration with regards to any development proposal in the open countryside.
- 3.2 Public views to the site from the north are limited by existing development along Higher Lane.
- 3.3 The key receptor groups determined are therefore; residents both on the settlement edge and associated with scattered farmsteads to the south (Crouchley Hall Farm, Yew Tree Farm) and the wider landscape south of the site.
- 3.4 Users of the local footpath network, namely the footpath running through the site from Lymm Water Tower to the agricultural track, and through Crouchley Lane Farm, will also be affected.
- 3.5 Highway users on the local road network which may include leisure users eg cyclists, horseriders; Crouchley Lane is the primary routeway within the context of the site, although glimpsed views from Higher Lane, Manor Road and Tower Lane may be possible.

Sensitivity to change (including value and susceptibility)

- 3.6 The sensitivity of private residential receptors are low, as determined by Good Practice, however users of the PROW network and minor road users will be high given that the travel speeds are lower (than arterial roads for example) and activity is focused on the enjoyment of the open countryside.
- 3.7 Following balanced assessment overall sensitivity is therefore determined as medium.

Likely Visual Effects of Housing Development

- 3.8 A high number of residents, visitors and users of the area would be directly affected by the visual changes arising by the development of the site. The loss of landscape features and introduction of inappropriate and uncharacteristic elements in close views will be experienced and as such be a significant change from the existing condition.
- 3.9 In particular users of the local footpath and Crouchley Lane, as well as residents of scattered settlement in the landscape to the south, will experience substantial

containment in views and increase of builtform where there is currently very minimal presence arising from the encroachment of settlement across a natural boundary on to the southern slopes of the escarpment. They will also experience the loss of a distinctive landscape feature.

- 3.10 In summary visual effects are expected to be moderate adverse and are unlikely to be mitigated through design.

4. GREEN BELT ASSESSMENT

Consideration of the WBC Green Belt Assessment (2016)

4.1 This section considers the site and the findings of the strategic assessment against the Green Belt Assessment undertaken by ARUP; applying ARUP's methodology in relation to the site our comments would be as follows:

- **Green Belt Purpose 1 “to check the unrestricted sprawl of large built up areas”**

N/A

- **Green Belt Purpose 2 “to prevent neighbouring towns from merging into one another”**

N/A

- **Green Belt Purpose 3 “to assist in safeguarding the countryside from encroachment”**

This assessment has highlighted the prominence of the site and the importance of the sand stone escarpment on the south side of the village as a natural feature which safeguards from encroachment. If breached by development, it is considered that this change would significantly affect the character and openness of countryside within the Green Belt to the south. We therefore fully support the WBC GB assessment in their finding that the site makes a strong contribution to safeguarding the countryside from encroachment.

- **Green Belt Purpose 4 “to preserve the setting and special character of historic towns”**

The assessment has found that the spires, articulated roofline and distinct building forms on the village edge, which constitutes the northern boundary to the site, are important as visual indicator of the proximity of the historic centre in views from the south (within the GB and on the approach). It has therefore been demonstrated that the open nature of the escarpment (which includes the site) serves to support the preservation of a distinct settlement edge and the special character of the historic village and its setting. Rather than making a weak contribution in this regard, it is our view that the contribution is therefore moderate.

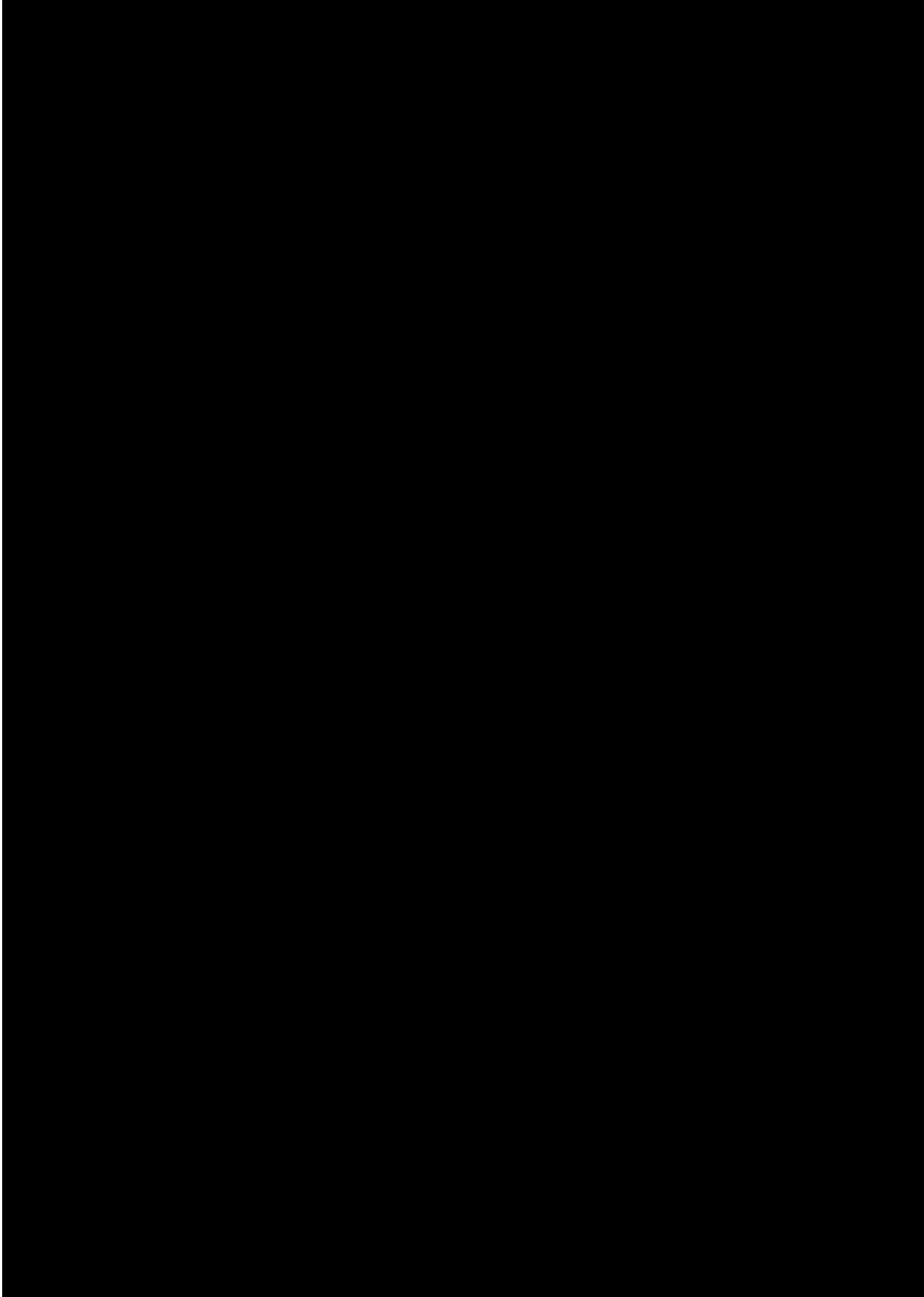
- **Green Belt Purpose 5 “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”**

N/A

5. CONCLUSION

- 5.1 This assessment has established that the value and susceptibility of the Land East of Crouchley Lane is vulnerable to the effects of housing development and does not have the capacity to accommodate development of the nature under consideration. Rather than enhancement any potential housing proposal will result in the loss of a distinctive landscape feature and diminution of the historic settlement edge.
- 5.2 In terms of visual amenity the proposals are likely to result in significant visual change from the public highway in the immediate locality. Near views from the public footpath would be fundamentally affected with the introduction of built form in close proximity. In terms of distant views from the landscape to the south; receptors would experience clear views of the development extending down the southern slopes of the sandstone escarpment which is an important rural component in the wider landscape as well as for the setting of the historic village. This change would be fundamentally at odds with the establish interplay between the village and its rural hinterland.
- 5.3 The WBC Green Belt assessment has correctly determined that the Land East of Crouchley Lane is inappropriate for development, and this review establishes further points of relevance in particular the importance of the sandstone escarpment for the distinctive setting of the village on its southern side and the substantial likely impact to this distinctiveness should the development breach this natural feature.
- 5.4 Overall the release of this site from the Green Belt would materially impact the landscape resource and have a significant adverse impact on the overall functionality of remaining land parcels. The site should therefore not be allocated by WBC for release from the Green Belt in this case.

Appendix I:



Appendix 2:

Our Ref: FC/KN0116/17

Date 25 September 2017

Brandon House, King Street, Knutsford,
Cheshire WA16 6DX
Tel: 01565 757500
Email: knutsford@walsingplan.co.uk
Web: www.walsinghamplanning.co.uk

Warrington Borough Council
Planning Policy and Programmes
New Town House
Buttermarket Street
Warrington
Cheshire
WA1 2NH

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

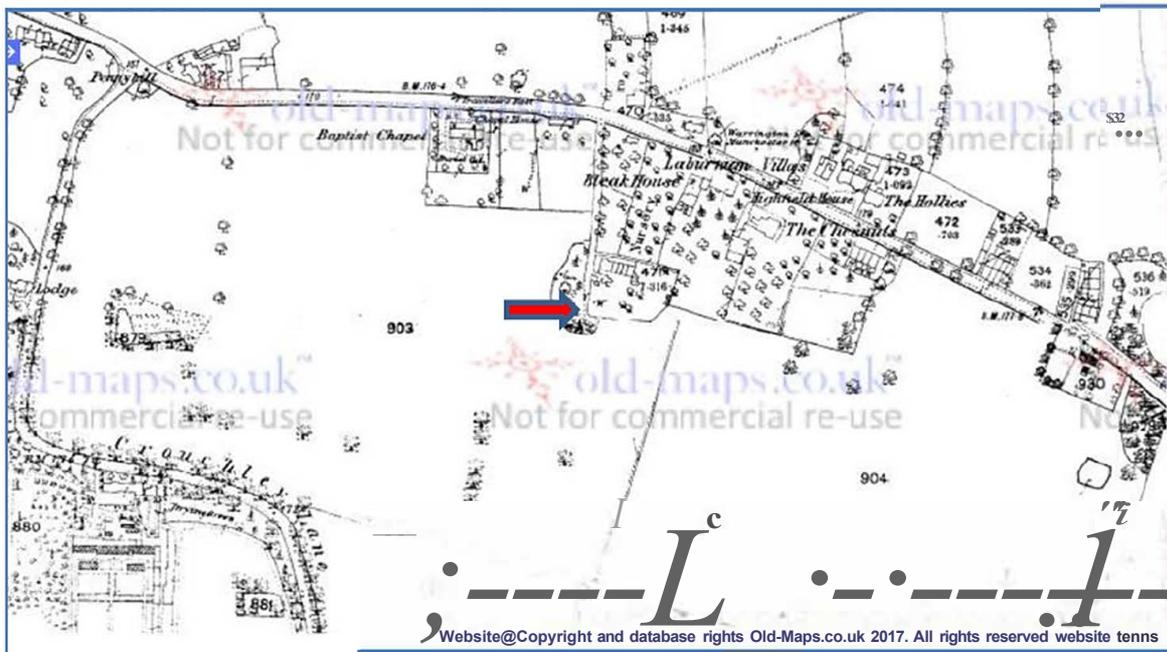


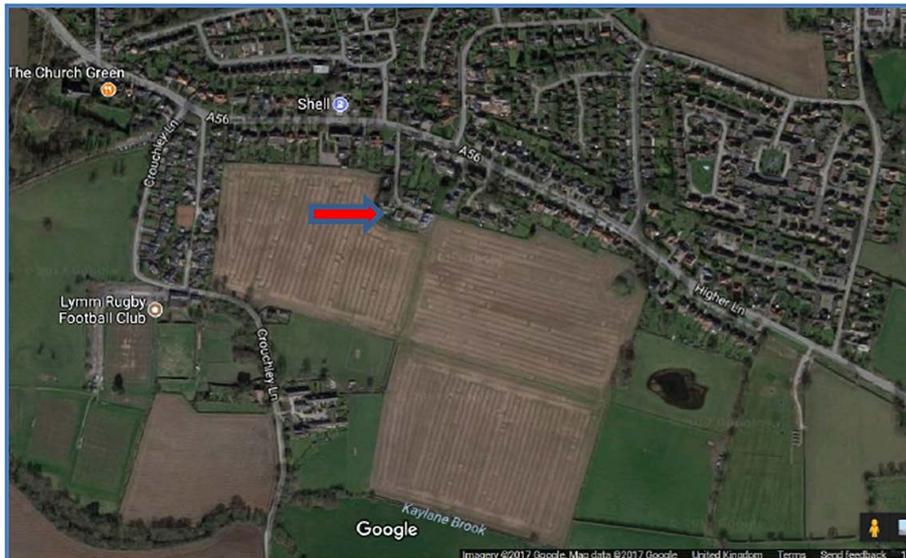
132 of the NPPF states "significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting".

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.

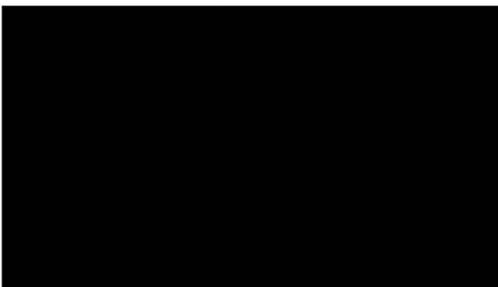




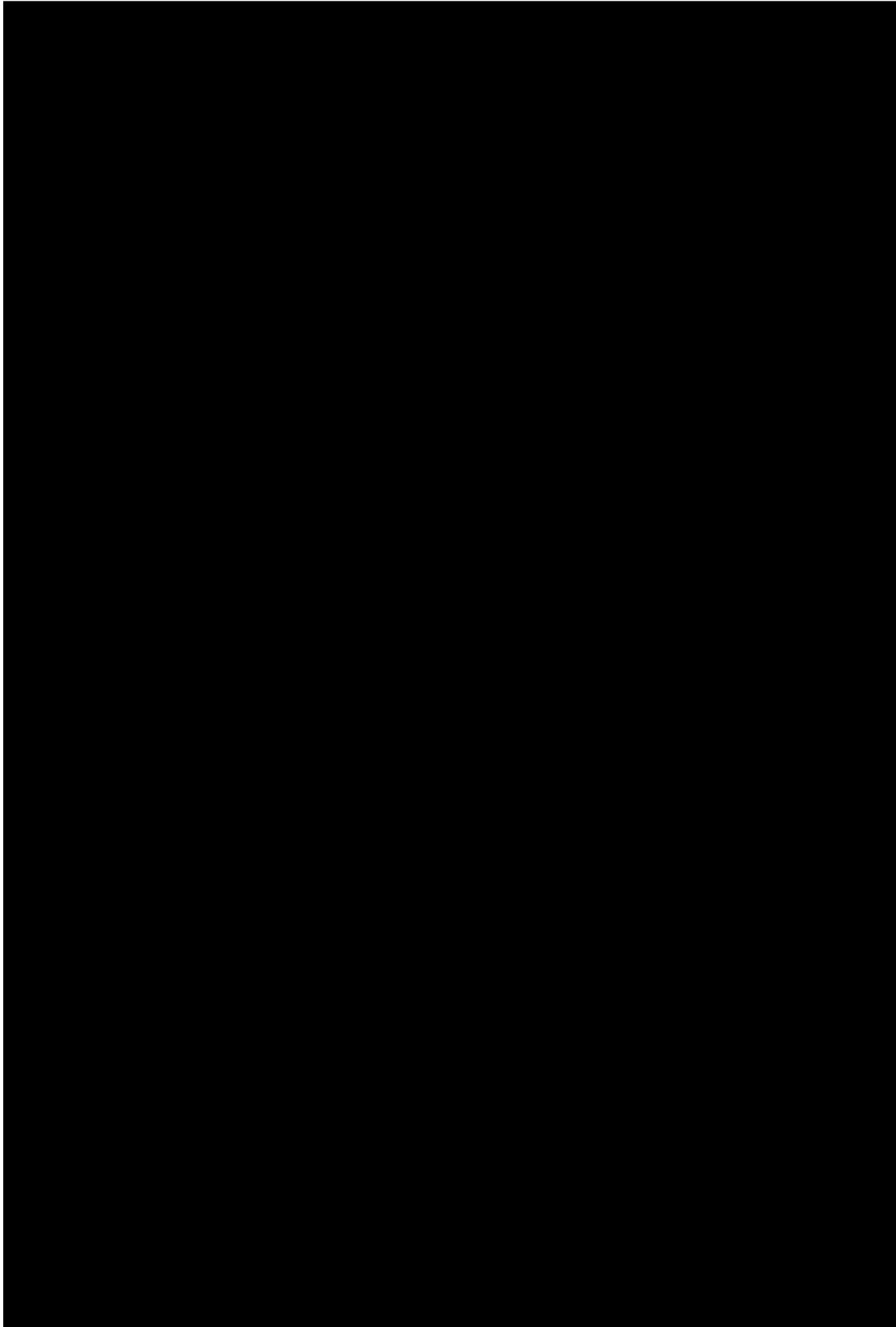
Conclusion

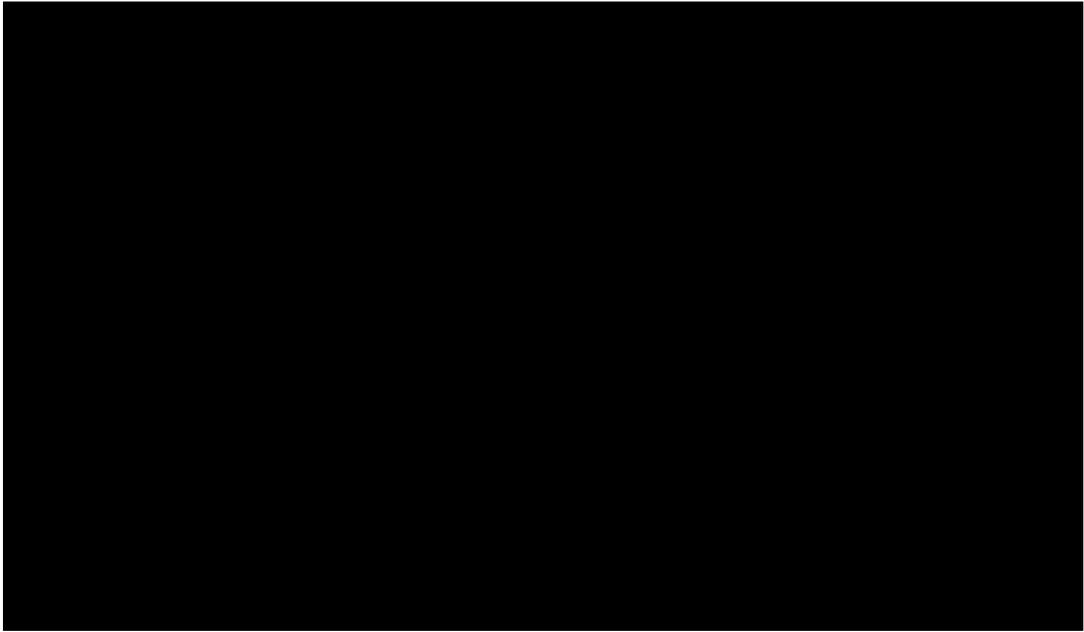
As stated above we are not commenting on the need for 500 homes to be built in the Green Belt around Lymm. However, should this requirement go forward, this site should certainly not be released for housing development. The site makes a strong contribution to the purposes of the Green Belt and development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

Yours faithfully,



APPENDIX I







Walsingham Planning Limited. Company Reg No. 09402985 VAT No. 245 9002 16
Registered Office: Bourne House, Cores End Road, Bourne End, Bucks SL8 5AR

Also offices in Bourne End and Bristol



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Registered Office: Bourne House, Cores End Road, Bourne End, Bucks SL8 5AR

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