



Dear Sir/Madam

Parcel R18/076 (SHLAA 2901) within Green Belt parcel LY22

Following a detailed consideration to the Regulation 18 Consultation on the Warrington Local Plan Review, we wish to make a number of comments, contained within the attached PDF.

We 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 in 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. It is also referred to as Parcel R18/076 within the larger Green Belt parcel, LY22

This representation will make the case why it is considered that Parcel R18/076 should not be released from the Green Belt.

Regards



**A representation opposing the submission to the Warrington Local Plan Review,
regarding Land East of Crouchley Lane in Lymm**

Parcel R18/076 (SHLAA 2901) within Green Belt parcel LY22



1. Introduction

Parcel R18/076 (outlined in red, above) has been submitted, in response to a call for sites by Warrington Borough Council, as a candidate for allocation in the emerging Local Plan.

The following document addresses the case for not releasing this site from the Green Belt and is made by [REDACTED]

2. Housing in Lymm

Contrary to the representation put forward by Berrys, on behalf of [REDACTED] we believe this site will not be attractive to the market, primarily because of the reluctance of homeowners to be overlooked. Lymm Water Tower, which sits within 20m of the northern boundary of the site, as shown in figure 1 on page 2, is 29m high and will overlook any development of this site. Furthermore, the tower is home to all the major mobile phone operators, who have antenna and dishes sited on the roof.

So whilst the Mid-Mersey SHMA reports that Lymm attracts professionals and higher earners from other parts of the UK into Warrington Borough Council's area. We are not convinced this is the right location in which to provide attractive housing.

Fig. 1 Lymm Water Tower, seen from the middle of Parcel R18/076.



3. Green Belt

When we lose open Green Belt land, we lose more than just a view, a space to run or play, an easy escape from the city or valuable farmland. We lose land that has its own identity and plays its own role in England's heritage. It is this classic English countryside identity that we believe is the main reason to keep Parcel R18/076 within the green belt. See figure 2 below.

Fig. 2 The view across Parcel R18/076, from the west.



Arup assessed parcel R18/076 as part of an original Green Belt Assessment in October 2016 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'.

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.

Openness – as established, the parcel (LY22) as a whole, and site R18/076 in particular, make a strong contribution to fulfilling the fundamental aim of the Green Belt under paragraph 79 of the NPPF in protecting the openness of the Green Belt. It is the site's openness and unique landscape value that makes an intrinsic contribution to the purposes of the Green Belt, both on its own merit and as part of the parcel. Site R18/076 supports a strong degree of openness, with long line views of the surrounding countryside. And it is this openness that preserves the setting and special characteristics of the historic village of Lymm.

The site crosses the important viewpoint of the St Mary's Church and in particular, the Grade II listed Lymm Water Tower. A well-used, much-loved public right of way crosses the site, with the bucolic setting of the site (and the parcel, as a whole), being the main reasons for the paths popularity. See figure 3 below. This right of way is an important resource to the community. The agriculture of the parcel is a balance of both pastoral and arable farming. This, added to the open rolling landscape, and the unrestricted views, creates a strong feeling of high landscape quality – all of which are extremely pleasing to the eye. This is especially so from the northerly aspect of site R18/076.

Fig. 3 The tower, and church, as seen from the public right of way across the site.



Encroachment – overall site R18/076 makes a strong contribution to safeguarding from encroachment. With nondurable boundaries between the site and the rest of the parcel (LY22), the site has a strong role in preventing encroachment into the open countryside. It is also our belief that the Green Belt boundaries of this site and parcel (LY22) will endure beyond the plan period, primarily because the natural beauty of this landscape will not change. (NPPF paragraph 84).

Landscape value – the British landscape is uniquely beautiful; there is nothing like it anywhere in the world and it is vital for our children and grandchildren that it is protected. The parcel (LY22) as a whole and Parcel R18/076, in particular, is stunningly beautiful and plays an important role in the wider landscape value and the qualities of the rural nature of Lymm village. See figure 4 below.

Fig. 4 A view across Parcel R18/076, from the southern boundary to the north.



Site R18/076 sits on a slope, and it is the views from the top of this hill – expansive views over the rolling green Cheshire countryside – that we are looking protect. Whilst the views are particularly impressive from the northerly and westerly aspects, and from the public right of way, they can be enjoyed from any part of the parcel.

The parcel as a whole and the site in particular, protects and improves the quality and character of Lymm and the wider countryside, whilst maintaining and strengthening local distinctiveness and sense of place. This site, therefore, does not have the capacity to accommodate development, whilst respecting its unique character.

Environmental value – most of the Green Belt – about two-thirds – is indeed in agricultural use. But when global population growth and climate change are putting increasing pressure on land, and when we grow less than two thirds of our own food, it seems strange to argue that growing food has no environmental value. Now, more than ever, we need to use land wisely and avoid unnecessary loss of countryside.

We also believe when planning for the environment, we should focus first and foremost on protecting our most beautiful landscapes. Site R18/076 is an area of great landscape value, which could be lost forever, to the detriment of current and future generations.

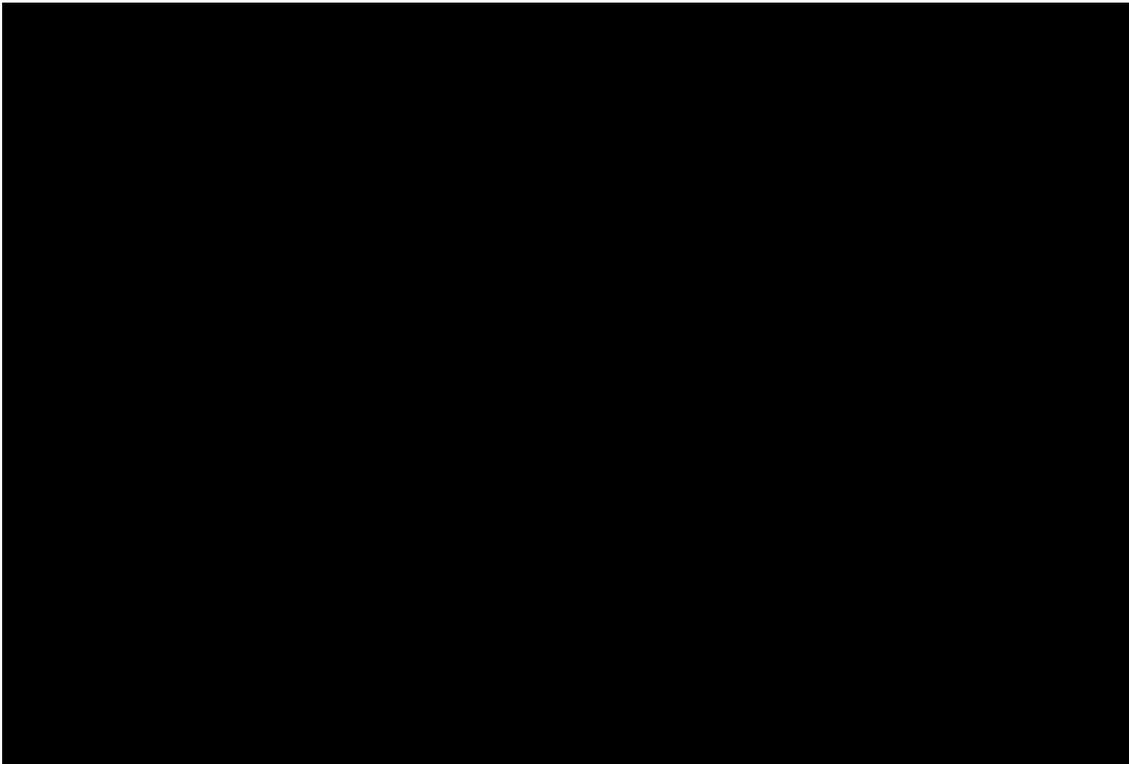
4. Site Appraisal

Site access – contrary to the representation put forward by Berrys, we believe the proposed site access will have more of a traffic impact than alternative sites, primarily because the of the access point on Crouchley Lane. This access point is on a narrow country lane, unsuitable for anything more than light traffic; furthermore, the proposed access is on a bend, adding to its unsuitability.

Countryside character – Lymm’s agricultural landscape is arguably one of the best in the Borough, in terms of quality and condition. Also, to simply state that the site is grade 3 agricultural land misses the point of the Green Belt. The site is an area of great landscape value; as a consequence the landscape quality of the site should be taken into account, when considering its removal from the Green Belt.

There are also a number of substantial trees along the northern boundary of R18/076, which are protected by TPO-99. These large mature trees form an intrinsic part of the skyline and therefore add to the landscape value, which would be severely diminished if the site were developed in the future. See figure 5 below.

Fig. 5 Five of the 9 protected trees, a view across the site, from Lymm Water Tower.



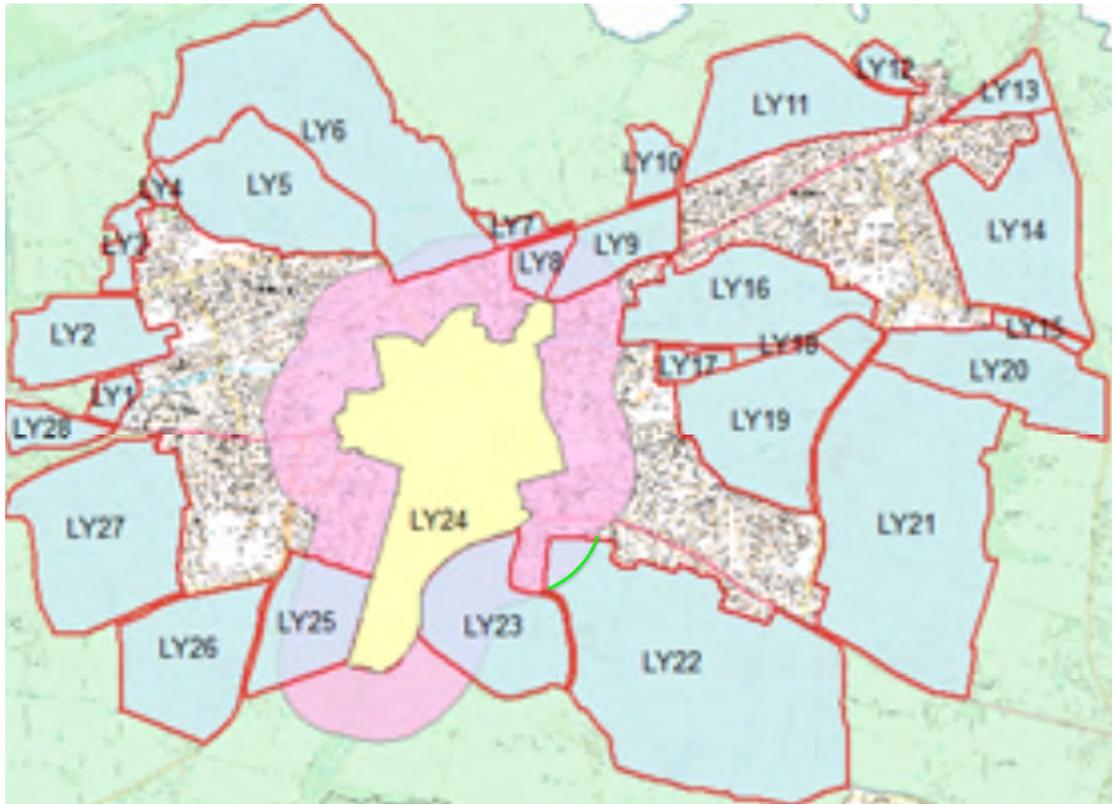
Lymm Conservation Area Buffer Zone – the Conservation Areas within Lymm is identified on the map in yellow – figure 6 below. These have been defined within the assessment as the ‘relevant Conservation Areas’. A 250m buffer zone (in pink) has been drawn from the Conservation Area outwards. This Conservation Areas reflects the important characteristics of the historic town of Lymm.

The important point here is that permitted development rights are restricted in conservation areas and buffer zones, making the site less attractive to developers.

Whilst Arup’s acknowledged that the northwestern aspect of site R18/076 is located within the 250m buffer area around the Lymm Conservation Area. Their view is the parcel (and therefore the site) makes a weak contribution to preserving the setting and special character of historic town, because the conservation area is separated from the Green Belt and from the parcel by modern residential development along Manor Road.

We would argue otherwise, on the basis that buffer zones exist to restrict further development in an area already designated for conservation.

Fig. 6 The Lymm Conservation Area buffer zone cutting across the proposed site (green line).



Important Viewpoints – these have been mapped by WBC in order identify and acknowledge where a parcel might cross an important viewpoint. There are none in Lymm, however, we would argue that the views across parcel LY22 should be considered important viewpoints.

Development is discouraged along Important Viewpoints and is especially relevant as Lymm is a historic town.

We feel that the views of both St Mary's Church and Lymm Water Tower need preserving. The long-range views to the water tower and church form a distinctive skyline on the sandstone ridge to the north of site R18/076. In addition, we feel that the views across parcel LY22 as whole should also be preserved; viewed from the north of site R18/076 they form the classic English landscape. Any development on site R18/076 would completely change the unique character of this landscape.

Historic environment – Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural, economic and environmental benefits. The settings of a heritage asset are the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, and may affect the ability to appreciate that significance.

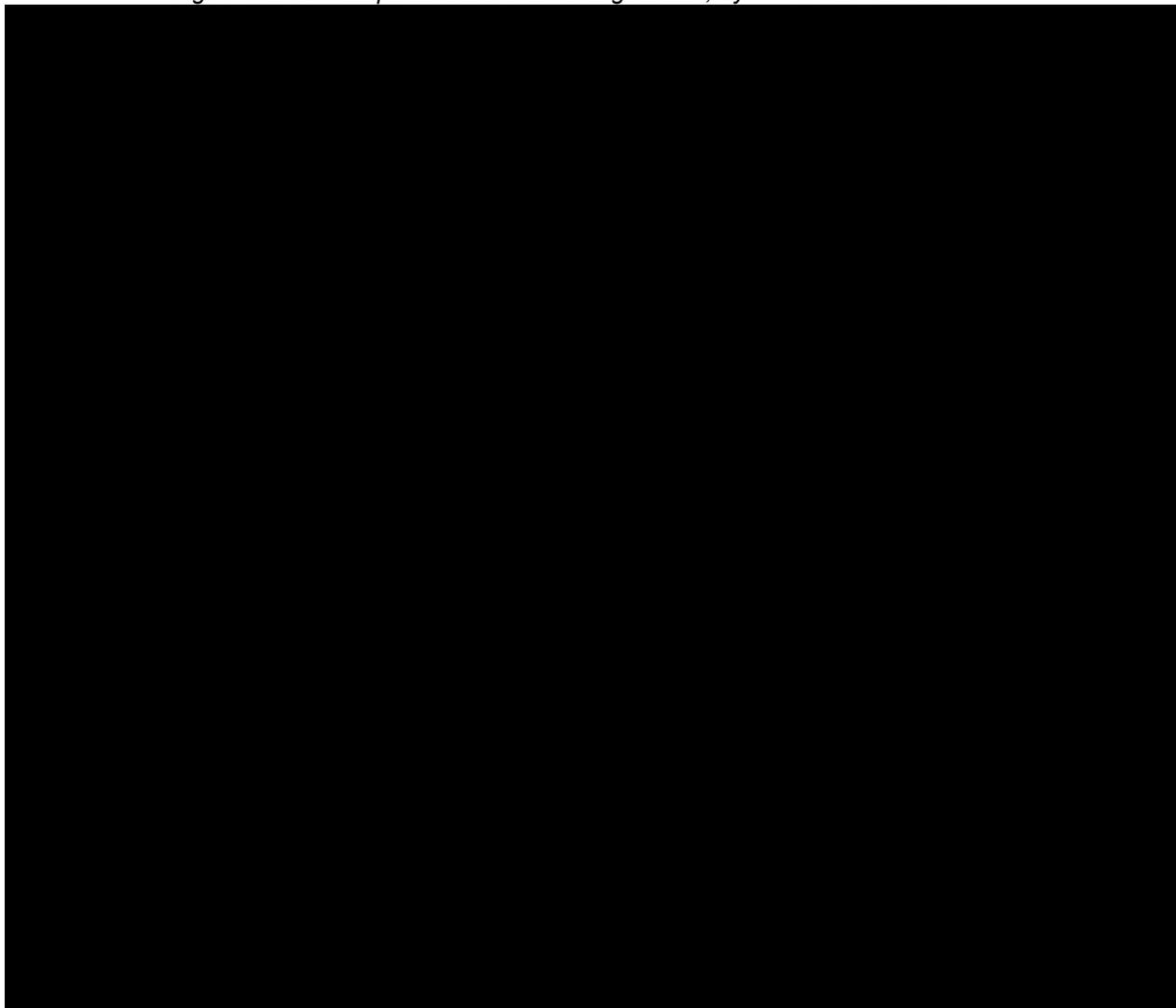
Site R18/076 adjoins the curtilage of Lymm Water Tower, a distinctive feature on the summit of the lower red sandstone ridge to the north of the site. It therefore follows that the significance and setting of this designated heritage asset would be profoundly affected by any development on site R18/076.

The setting of a listed building is often an essential part of a building's character. This is particularly the case with Lymm Water Tower, as the original design of the Victorian water tower was no accident. Whilst its function as a water tower is obvious, the design style adopted was purely theatrical, with the building's sponsors – the local landed gentry – opting to replicate the look of a castle on the hill, to be viewed from the surrounding countryside.

Today the water tower is an internationally recognised, multi-award-winning Grade II listed building, which counts a prestigious RIBA Award for Architecture amongst its many plaudits, making it of both special architectural and historical interest.

The grounds of the tower have been laid out specifically to interrelate to site R18/076, which in turn, complement the design and function of the building. See figure 7 below.

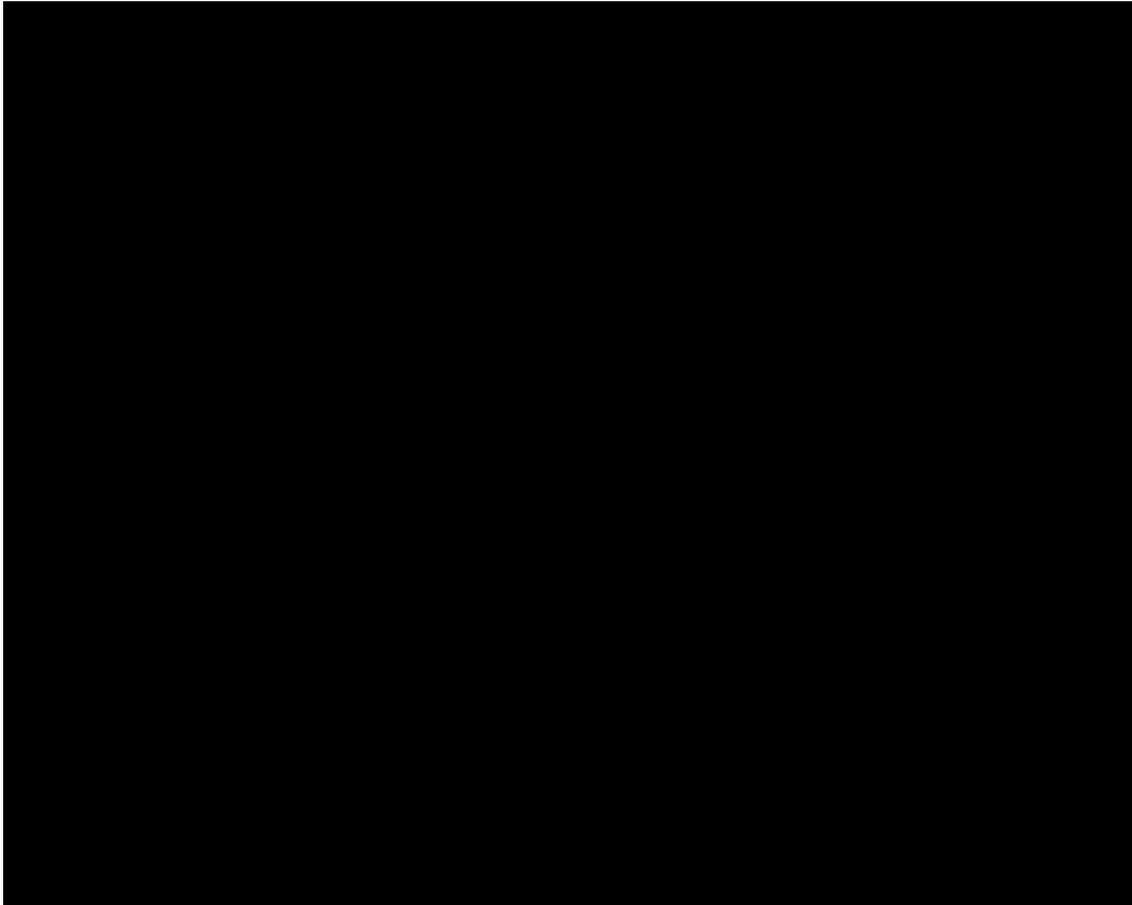
Fig. 7 The landscape ethos of the heritage asset, Lymm Water Tower.



The boundary between the tower's grounds and site R18/076 is formed by a haw-haw (a ditch with one side being a retaining wall; used to divide lands without defacing the landscape), which ties both the grounds and the site together, to form the overall setting of this heritage asset. Please see figure 8 below. Due to this open boundary, Parcel R18/076 enjoys inter-visibility with the water tower, clearly therefore, any development which can be seen within view of the tower, lies within the setting of that listed building. It cannot therefore be disputed that such a development would potentially affect the setting of the listed building.

The economic viability, as well as the character of listed buildings within such planned settings may suffer where inappropriate new development isolates them from their surroundings or degrades their landscape setting. This can effectively rob such buildings of much of their interest and the contribution they make to the local countryside or townscape. It is the visual harmony Parcel R18/076 affords that enriches the setting of this listed building.

Fig. 8 Part of the boundary between Lymm Water Tower and Parcel R18/076.



There are both long-range views to, and from the building. See figure 9. The 100ft tower sits on the sandstone ridge and dominates the northerly aspect of the site, forming a distinctive historic skyline. Any residential development of Parcel R18/076 would block any direct views of the site

Any proposals to remove Parcel R18/076 from the Green Belt for future development, which by its character and location will have an adverse affect on the setting of Lymm Water Tower, will require very careful consideration by WBC. Even development proposals some distance from the water tower, would have an adverse affect on its setting as part of a historic skyline.

Lastly it has been suggested by Berrys that an area of public open space can be positioned adjoining the water tower and along the line of the existing public right of way to allow public views of the water tower. To achieve this would require little or no development between the tower and the full length of the existing public right of way, making Parcel R18/076 uneconomically viable.

Fig. 9 The view across Parcel R18/076 from the ground floor of Lymm Water Tower.



5. Summary

Housing expansion into Green Belt sites over the years has fundamentally altered and reduced the rural character of the area of Lymm, for which it is renowned. And it is this unique English landscape character we are looking to preserve in objecting to the removal of site R18/076 from the Green Belt.

We believe parcel LY22 and site R18/076, in particular, should be considered an Area of Great Landscape Value (AGLV) - an area of land with a quality of landscape which is considered to have a particular scenic value – and should not be developed now, or at any time in the future.

In addition, Section 66 of the Listed Buildings Act an LPA is required to pay special regard to the desirability of preserving the setting of a listed building, and as we believe the historical and architectural significance will be adversely affected by any residential development, we encourage WBC to reject the application to remove site R18/076 from the Green Belt.

Lastly, the NPPF refers to the essential characteristics of Green Belts being their openness and permanence. It states that once established, Green Belt boundaries should only be altered in exceptional circumstances, and we do not believe the case for removing Parcel R18/076 from the Green Belt is anywhere near strong enough.

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