



27th September 2017

Planning Policy Team
Warrington Borough Council
New Town House
Buttermarket Street
Warrington WA1 2 NH

Dear Sir/Madam

Response to Regulation 18 Consultation on Local Plan: Preferred Development Option

We are responding to the opportunity to present our views as local residents on the above consultation document. Specifically, this is in connection with the parcel of land referred to as LY21 in the Green Belt Assessment undertaken by Ove Arup.

As you know, Ove Arup concluded in their initial report that this should be categorised 'strong' and spelled out at some length why they had come to this conclusion:

*The parcel makes a strong contribution to one purpose, a moderate contribution to one and no contribution to three. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The parcel has been judged to make a strong overall contribution as it supports a strong to moderate degree of openness and there are non-durable boundaries between the parcel and the countryside therefore the parcel has a strong role in preventing encroachment into the open countryside. **The parcel therefore makes 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.***

After representations, presumably from the developer hoping to build on the site, Ove Arup reconsidered their original conclusion and re-categorised it as 'moderate'. Their report now said: *The parcel makes a strong contribution to one purpose, a moderate contribution to one and no contribution to three. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. **The parcel has been judged to make a moderate overall contribution.** The parcel supports a strong-moderate degree of openness and although the southern section of the eastern boundary is not durable, the parcel's remaining boundaries with the countryside are all durable consisting of roads or protected woodland. These boundaries could contain development and prevent it from threatening the overall openness and permanence of the Green Belt.*

It seems to us to be perverse that 'a strong contribution to one purpose, a moderate contribution to one and no contribution to three' in each case can lead to two different conclusions, particularly when in each case Ove Arup claim that unexplained 'professional judgement' has been applied to evaluate the overall contribution.

It is noteworthy that under the criterion 'Purpose 3: to assist in safeguarding the countryside from encroachment' which we would suggest, in the view of most people, is a central plank in green belt protection of the countryside, the overall assessment has remained '**strong**'.

It may be worth highlighting the original assessment and the subsequent revision:

ORIGINAL ASSESSMENT

Strong contribution: The parcel is connected to the settlement along a section of its western boundary. This consists of Oughtrington Lane, which is a durable boundary which would be able to prevent encroachment into the parcel. The parcel is also connected to the settlement along garden boundaries in its south western corner, which constitute a less durable boundary. The parcel is well connected to the countryside by a mix of durable and non-durable boundaries. The northern boundary consists of protected woodland which is likely to be permanent and durable in the long term. The western boundary consists of Oughtrington Lane, which is also durable, as is Higher Lane along the southern boundary. The parcel's western boundary with the countryside consists of a mix of field boundaries and non-protected woodland, which are not durable and are unlikely to be able to prevent further encroachment if the parcel is developed. The existing land use mainly consists of open countryside. There are two active farms along Higher Lane and Lymm High School is situated in the west of the parcel. There is moderate vegetation forming internal hedgerow boundaries within the parcel. The parcel supports extremely long line views of the surrounding countryside and overall supports a strong degree of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment.

REVISED ASSESSMENT (changes shown in red):

Strong contribution: The parcel is connected to the settlement along a section of its western boundary. This consists of Oughtrington Lane, which is a durable boundary which would be able to prevent encroachment into the parcel. The parcel is also connected to the settlement along garden boundaries in its south western corner, which constitute a less durable boundary. The parcel is well connected to the countryside by a mix of durable and non-durable boundaries. The northern boundary consists of protected woodland which is likely to be permanent and durable in the long term. The western boundary consists of Oughtrington Lane, which is also durable, as is Higher Lane along the southern boundary. **The parcel's eastern boundary with the countryside consists partly of TPO protected woodland (Helsdale Wood and Newhey's Plantation) which are durable and partly of field boundaries (to the south), which are not durable and are unlikely to be able to prevent further encroachment if the parcel is developed.** The existing land use mainly consists of open countryside. There are two **residential properties** (converted farm buildings) along Higher Lane and Lymm High School is situated in the west of the parcel. There is moderate vegetation forming internal hedgerow boundaries within the parcel. The parcel supports extremely long line views of the surrounding countryside however due to the levels of built form (less than 20%) it supports a strong-moderate degree of openness. Overall the parcel makes a strong contribution to safeguarding from encroachment **due to the non-durable section of the eastern boundary.**

In explanation, Ove Arup apologise for the typographical mistake in confusing 'eastern' with 'western' but beyond that the only substantial point they appear to make is that '...Reference to active farms in purpose 3 should be amended to recognise that these are converted farm buildings in residential use. These residential uses increase the levels of built form within the parcel and therefore change the degree of openness to strong-moderate'.

In fact, the two buildings have not substantially changed since they became residential properties and the the associated land within the parcel is still farmed or capable of being farmed.

Notwithstanding this point, and the presence of the substantial Lymm High School within both assessments, we note that the overall assessment of '**strong**' has been retained in both assessments.

We therefore object strongly to the re-categorisation of parcel LY2I from 'strong' to 'moderate'.

We would like to make one final point. It is, of course, right and proper that Warrington Borough Council should engage a major consultancy to undertake an important study on their behalf in connection with an issue as vital as green belt policy. It is not unreasonable that the consultants should be invited to draw conclusions and make recommendations for consideration by the Council.

However, the final decisions have to be taken by the Council, not the consultants. It may be that in many cases, the Warrington Planning Team will have a better knowledge and understanding of the local geography and topography than the consultants, however diligent their research.

In the case of Parcel LY21, there are two principal directions from which the parcel can clearly be viewed: from Oughtrington Lane and from Higher Lane. The two photographs below show the views from each of these locations:

From Oughtrington Lane



From Higher Lane



We believe that any reasonable person would take the view that the green belt parcel designated LY21 should be retained, to maintain the separation of Lymm and Oughtrington in one direction and between Lymm and Broome Edge in the other. We trust that Warrington Council will come to the same conclusion.

Yours faithfully,

[Redacted signature]