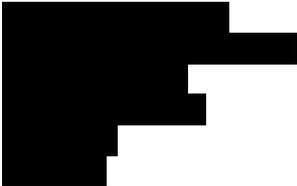




27<sup>th</sup> September 2017



Dear Sir/ Madam,

We are writing to respond to the consultation on the Warrington Local Plan Review – Preferred Development Option. These comments relate to the preferred option as a whole as well as some specific comments on a green belt parcel assessment carried out by Ove Arup & Partners.

**PDO - Future jobs growth, housing need and green belt release**

As we understand it from the PDO documentation supplied, the housing need identified up to 2037 is 1,113pa based on the future increase in employment being targeted in the Cheshire and the Warrington Local Enterprise Partnership (LEP) strategic economic plan and in support of Warrington Borough Council's "New City" aspiration. This figure appears to have been backdated to 2015, with the shortfall in delivery since then being added to the target going forward to give a housing requirement of approximately 24,000 houses over the next 20 years. According to the latest housing land availability assessment this means that enough green belt land to build approximately 9,000 properties will need to be released over the period of the plan. A minimum of 1000 of these are to be provided by the "outlying settlements".

Our main concerns with the option as currently proposed are:-

- There has been very little engagement with the residents of Warrington over the New City ambitions of the council in partnership with the LEP and others. While the population in general understand that growth has to occur to provide new housing and employment opportunities within the town, the scale of growth in this plan, if it happens, will have huge implications for it's residents and those of the outlying settlements over the next 20-30 years. It's therefore important that any plan to grow on this scale has the consent and support of the people that have to live with the long term consequences. I don't believe that WBC have either of these at the moment.
- There has been no consideration given to the likely consequences of Brexit throughout the process of forecasting future job creation, population increase and the resulting need for housing. This is despite the view given by Metro-Dynamics in their June 2017 review of employment targets that "...there are major uncertainties around the future path of growth in the UK as a result of Brexit". This appears to have been a major oversight given that almost 60% of Warrington's output is sold into the EU.
  - Metro-Dynamics also acknowledge that "Many events, both positive and negative, could be envisaged that have an impact on the path of employment growth in Warrington". However, from reviewing the documents I cannot find any substantial analysis of these negative events (including Brexit) in the evidence base documents. In contrast, potentially positive developments, such as a devolution deal, infrastructure projects like HS3 and many others are treated as given and used as justification to inflate the baseline population growth and housing needs figures wherever possible. As things stand, many of these positive developments look significantly less likely to come to fruition than Brexit.

- As the economic forecasts are the basis for all subsequent work to produce the housing needs figure, it is apparent from the previous points that the evidence base for housing need is currently neither robust or proportionate. Without this standard of evidence it's not possible to see how the "exceptional circumstances" required for amending green belt boundaries can be demonstrated.
- If this plan were to be adopted, large areas of green belt land will be immediately released. In the event that the employment growth and housing need falls short of that anticipated, there will not be anything in place to obligate housebuilders to build on brownfield land in preference to released green belt sites.
  - The likely effect of not having this protection is that the first choice for developers will be to build new homes and businesses on the more profitable greenfield sites on the outskirts of the town and in the outlying settlements, which do not have the infrastructure to support the new population. This is unsustainable development.
  - It may also slow or prevent much needed and more sustainable development of brownfield sites both within the urban areas of Warrington and the neighbouring authorities.
  - This is therefore a high risk plan that could leave the people of Warrington with all of the costs in terms of loss of green space, increased traffic congestion, environmental damage, pressure on services etc., with few or none of the economic benefits promised at the outset.
- Both the plan period of 20 years and subsequent further supply requirement of 10 years are excessive, particularly given the uncertainty of forecasting economic growth, population growth and housing need over the medium-long term which is acknowledged throughout the evidence base documents. This could result in much larger amounts of land being removed from the green belt than are eventually required.
- A shorter plan period could help avoid this outcome, with limited green belt release until the uncertainties of devolution, HS2, HS3, Brexit etc are clearer and potential sites like Fiddler's Ferry may have become available. This would enable the growth to be managed in an incremental way that minimises loss of green space and maximises sustainable development in the right locations.
- Development of the outlying settlements offers a negligible contribution to Warrington's New City plans. Why therefore are these places being proposed for green belt release and development in the first five years of the plan? It's hard to imagine any exceptional circumstances that exist for this to happen so soon when there are many non-green belt sites identified in the latest Strategic Housing Land Availability Assessment (SHLAA) that could be brought forward before any green belt would be required.
- The evidence base documents acknowledge that schools and medical facilities in the outlying settlements and in Lymm particularly are already at capacity. We don't believe that the proposed "incremental growth" of 10% in the next 5 years is sustainable without additional infrastructure being provided, none is currently proposed.

### **Green Belt Assessment: Parcel LY21, Land North of Higher Lane, Lymm**

We would like to comment on the green belt assessment and subsequent amendments made for the above land parcel. Below is an extract from the concluding text of the original assessment report from October 2016 for LY21:-

**"The parcel 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".**

Source: "Warrington Borough Council, Green Belt Assessment, Final Report", dated October 2016. Page H9, Parcel LY21 'Justification for assessment' column.

This is in stark contrast to the amended assessment report from June 2017:-

**"The parcel has been judged to make a moderate overall contribution"**

Source: "Warrington Borough Council, Green Belt Assessment, Addendum following Regulation 18 Consultation", dated 29th June 2017. Parcel LY21 'Justification for assessment' column.

It's clear that the assessment has been substantially amended, presumably following responses received during the regulation 18 consultation carried out between October and December 2016. We would like to register our strong

objection to the changes contained within the June 2017 Assessment Addendum document and outline the reasons below.

We were interested to know what facts have changed since October 2016 to justify such a significant downgrade of this parcel's contribution to Green Belt purposes given that the conclusions reached in the original assessment were so emphatic. The two reasons that have been cited for the change are contained within the June 2017 Green Belt Assessment Addendum document, on page 13. These both refer to the assessment against green belt purpose 3 – "to assist in safeguarding the countryside from encroachment". The reasons that have been put forward are listed below and we have provided our comments in response:-

Reason 1. - The "strong-moderate" degree of openness. (down-graded from "strong")

Detail:-

The Green Belt Assessment Addendum from June 2017 states on page 13 that two properties on Higher Lane that were assumed to be active farms have, in fact previously been converted into residential dwellings. In the opinion of the assessor, this re-classification from agricultural to residential use means that these properties should now be included as built form. This appears to have increased the calculated percentage of built form from "less than 10%" to "less than 20%" and as a consequence, reduced the openness of the parcel from "strong" to "strong-moderate".

Although not mentioned in the document, we assume that the properties referred to are [REDACTED] and [REDACTED] both located at the South East corner of the parcel.

Comments:-

1. Could Ove Arup please provide details of the sources of information and calculations carried out to assess the percentage of built form on parcel LY21, showing all boundaries and measurements used. This percentage has been used as a key technical factor in the judgement of openness so it's important that the calculation is published and clearly explained. This is of particular importance in this case, which the assessment implies is marginal.
2. It is stated in the October 2016 report that built form is defined as "Any form of built development excluding buildings for agriculture and forestry (e.g. residential properties, warehouses, schools, sports facilities)". The reason for this being that buildings for agriculture and forestry are "appropriate Green Belt uses which do not require their impact upon openness to be considered, according to paragraph 89 of the NPPF". Arup appear to apply this principle throughout the assessment by the use of the term "active farm". Where this term is used then the buildings in question are excluded as built form when judging the openness of a parcel. We believe that this interpretation is flawed for the following reasons:-
  - a. The re-use of agricultural buildings is appropriate in Green Belt in the same way as farm buildings in agricultural use. This is explained in paragraph 90 of the NPPF. In accordance with the methodology used for this assessment, any farm buildings currently used as residential dwellings should therefore not be considered as built form in this calculation.
  - b. The term "buildings for agriculture and forestry" should be applied to any properties that were built for agricultural purposes whether they are classed as currently "active" or not. Both of the properties referred to above were built for farming purposes, have previously been operated as farms for many years and could be turned to agricultural use at any time. As an example of this, Wildersmoor Farm has been advertised for rent in the recent past with the option to rent adjacent land specifically for farming purposes.

In consideration of points a and b above, the percentage of built form should revert to less than 10% as per the October 2016 assessment.

3. It is clear that parcel LY21 has a very strong degree of openness with extremely long line countryside views to the East, the Pennines beyond Manchester to the North East and the West Pennine Moors to the North. There are low levels of both built form and vegetation. All of these factors when taken together are the very definition of openness and rightly, this was the conclusion of the original assessment. The re-classification of these properties is a technical detail that has no impact on the open nature of this parcel.

Reason 2. - Predominantly durable boundaries.

Detail:-

The green belt addendum document states that the parcel has predominantly durable boundaries which should contain any encroachment into open countryside.

Comments:-

1. There is a significant length (½ km) of non-durable boundary at the southern end of the eastern boundary, representing almost half of the total length of this boundary. Contrary to the statement on page 13 of the addendum document, this is not a "small section" it is a large section. This non-durable boundary presents a high likelihood that any development of this parcel will result in further encroachment on the surrounding countryside in the future.
2. Both the October 2016 and June 2017 assessments agree with the above point and fully acknowledge that this section is non-durable, although it is erroneously referred to as western boundary in the October 2016 report. To quote the June 2017 assessment against purpose 3, these eastern field boundaries "are unlikely to be able to prevent further encroachment if the parcel is developed", coming to the conclusion that "Overall the parcel makes a strong contribution to safeguarding from encroachment due to the non-durable section of the eastern boundary". However, by the time we get to the conclusion in the "Justification for assessment" column this has become "These boundaries could contain development and prevent it from threatening the overall openness and permanence of the Green Belt". There is a clear inconsistency here and we believe that the final conclusion is incorrect.
3. It is evident that a weak, non-durable boundary represents a significant portion of the total boundary of this parcel. This will inevitably be unable to contain settlement encroaching into open countryside and the "predominantly durable boundaries" will be unable to prevent this. This parcel therefore strongly fulfils a fundamental purpose of green belt as defined in the NPPF.

In addition to the above, I would like to make the following points:-

- We note that there has been no acknowledgement, or credit given for the presence of the beneficial uses of green belt (as defined in NPPF para 81) in the purpose 3 assessment for this parcel, despite this being a key question to consider from paragraph 103. This parcel contains Lymm cricket club, Lymm High School sports grounds, public footpaths and is directly connected to Helsdale Wood, Spud Wood and Newhey's Plantation. The parcel therefore provides ample opportunity for sports and recreation, access to the countryside and strongly supports biodiversity by providing a respectful buffer between the settlement and an important local wildlife habitat. These are three of the beneficial uses according to the NPPF but there is no mention of any of these factors in the assessment.
- An amendment to the green belt boundary at this location would replace the durable, clearly defined eastern boundary of Oughtington Lane with non-durable woodland and field boundaries. This would be in opposition

to the requirements of NPPF paragraph 85 which states that green belt boundaries should be clearly defined using physical features that are likely to be permanent. Any change here would be a direct threat to the permanence of the green belt in this location, it's essential characteristic.

- Removal of this site from the green belt and the inevitable encroachment further east will result in a high risk of "ribbon" type development of Lymm along the A56. Prevention of this type of development is one of the aims of green belt policy.

In summary, the October 2016 assessment conclusion for parcel LY21 was correct and no new information has come to light to change the view that this parcel makes a very strong overall contribution to the green belt. In fact, the arguments made above further strengthen the case for this conclusion.

Could WBC please review this assessment with a view to re-instating the original conclusion (strong overall contribution) for this parcel? We note that the call for sites Green Belt assessment document correctly assesses the plot R18/111, within parcel LY21 as making an overall strong contribution, therefore this amendment would also provide consistency between these documents. We fully endorse the conclusion of the assessment of call for sites plot ref R18/111 as making a strong contribution for all of the reasons contained within the assessment as well as our comments above. Any further attempts to water down these assessments during the current consultation should be strongly resisted if the whole exercise is to retain credibility. We would be happy to discuss any of the points raised in our response to this assessment.

Please can the above comments be reviewed and taken into account when preparing the draft version of the Local Plan. We would also appreciate it if we could be given notification of the future stages in development of the Local Plan. Thank you.

Yours Sincerely

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