

**From:** [REDACTED]  
**Sent:** 14 July 2022 18:34  
**To:** Trueman, Kerry  
**Cc:** [REDACTED]  
**Subject:** Matter 3 0329 Dr Clive Freeman Inspectors examination re Warrington Local plan UPSVLP OS1

**Categories:** Hearing Statement

Dear Sir and Madam

I would like to discuss my concerns about the strategic planners of WBC in relation to my application in the call for site in OS1 Croft in the north east of Warrington. With the LDP going on for many years re Covid, it is a long time since my site was registered in August 2017 which was the second wave with applications for sites starting in October 2016?. Confirmed by email on 26/9/17.

I was concerned that being a small family non Agricultural site of less than 1 Hectare that I might need to fund planning advice but the officers reassured me this was not essential. but now I feel otherwise.

I heard nothing for months and phoned in April 2019 after long delays in the LDP assuming all was well. My site had not appeared on computer or on the online site map for Croft(OS1)

I was informed that my site had not been chosen and was told it had been rejected on the first sieve as being too strong in Green belt assessment in the 5 categories .At this time of rejection I was finally given a number R18/P2/002 and my site showed up on the site map (only following rejection)

I have previously applied in the UDP for Warrington in 2003 and the previous cancelled plan before UDP.

I attended the town hall enquiry and was heard by the inspector but at that time no green belt sites were needed and there were no administration problems with less computer involvement. I was also told by an officer on the phone that the chosen site had been selected due to pre-existing road connections and services coming from Abbey close and Deacon close from where the Heath Croft stud is accessed and not just due to it's mediocre green belt ARUP assessment.alleging that Heatcroft stub was only moderate for green belt

I was under the impression that sites are not just chosen as add- ons to the last big croft development of the 1980s to 1990s which was Abbey close and Deacons close owned by the current developers family who took over Heath farm from the Lears,(a farming family) This new development is just ongoing encroachment of the same area that was selected in the 80's.

These developments were in 2 areas as well as most of Heath farms land off Mustard lane there was a petrol station and large garage area off the east side of Lord st with probably over 100 houses combined that were built.

Prior to this a lovely area called Croft heath was developed in the triangle between Mustard lane and Sandy lane behind the old school loosing a lovely village amenity area next to the new village hall .In the 60's a further field was used for the new Croft primary school with the old school mainly demolished.

Strategic planners do not realize this as they only look forward so do not realize that this new site is just encroachment into further green belt land in the same site. as the 80's bearing in mind this was probably consecutive as UDP 2003 took no green belt village land for a 15 year period. An old military camp was developed on Lady lane some years ago being an unused military land. site so did not require to be in an LDP

In contrast to my site Heath croft stud must have been in constant communication via Bellway and How planners as they had no less than 3 site numbers

3155

R/18/095

R18/P2/056

Its green belt assessment was in July 17 mine was in May 18 but I did not hear anything until April 19.

With its green belt assessment Bellway produced a 43 page document in September 2017 almost 18 months before I heard about my sites rejection. .Bellway had contacted croft parish council at the very beginning of the LDP 2017.

It appears to me that Bellway's application was being prioritised before all other applicants had been fully assessed

I bought all these matters up in the first consultation period but they were not addressed

In one email on 17/4/19 it stated the Culcheth site had been selected rather than croft

I do not feel I was kept informed and do not feel WBC should be progressing sites without fully assessing all sites first.

I have stated previously that I do not believe Heathcroft stud/ stables is in anyway a brownfield site yet this is what How/Bellway call it A brownfield site in the USA requires contamination but in the UK can be previously developed land that has potential for redevelopment but is mainly land used for industrial and commercial purposes and possibly contaminated .This should only be when the land is derelict and not for an active equestrian business like Heathcroft stud which would probably continue if not given building status..

If you allow this every equestrian business in the land given rural planning permission in green belt will follow Heathcroft stud by applying for building status

The argument that there is no encroachment really only applies to the 20-30% build and not the green fields and graveled exercise areas which are still green belt. There is an argument for demolishing the buildings only( large equestrian centre) and leaving the green fields behind the school

My site(002) is basically 75% unused jungle and has had no agricultural use in over 75 years .A small area is mown. This is more brownfield than Heathcroft stud but has had no industrial usage. but is just unused.

I understand that Matter 3 is not supposed to be site specific but I cannot get my arguments across without using site comparison information

I have not been able to compare other sites but I have noticed that my site is one of the few sites sites proposed with less than 1 hectare at 0.975 h which is not large enough for all Crofts green belt allocation but under paragraph 69 of NPPF 10% of sites should be less than 1 hectare.

## Green belt assessments

This is one of my major concerns in that I have no confidence in the assessments performed by Arup.

I fully understand that these are done remotely.

They use google earth and google street but this is nowhere near as effective as site visits

I understand from Bellways' comment from 15/11/2021 that Heathcroft stud has apparently had a further green belt assessment by WBC confirming

it is weak in contributing to the 5 purposes of green belt but I do not agree with it.

Looking at Heathcroft stud at 3.8 hectares it has weak borders to the north up Mustard lane which goes north easterly and a weak border to the east facing towards Lady lane with hundreds of acres of open field with only fences between them

It has a hard border between the primary school and houses on Deacon close on the west side with Mustard lane

The southern border is a very scenic tree tunnel pathway off Abbey close which is being regarded as a hard border but it is very likely this beautiful right of way going to the parish church will be trimmed or new residents will complain of loss of light.

There is only a large field between this path and Bettysfield drive to the south and I feel this to be the next phase in the continual development of land east of Mustard lane and Lord st.

The ARUP assessment calls the north and east of mixed durability yet calls the western boundary weak being mainly garden fences and the school despite there being no land to develop unless the school sells its playing field. It calls the north boundary weak and eastern boundaries mixed. It calls the south boundary strong which is not the case. Previous development on Abbey close has reduced the length of the pathway to Croft parish church which now starts at the end of Abbey close. The pathway on the south will not stop future development and is not durable to me.

I cannot understand ARUP when it admits it has weak boundaries yet calls it having a moderate role in safeguarding the countryside from encroachment with weak boundaries

I cannot see why this site is considered weak in green belt terms with wide open fields visible from 2 sides and 3 weak borders it is very likely to suffer future encroachment from the South and north and east and is not enclosed on 2 sides.

There is an important omission in the green belt assessment for Heathcroft stud which varies seasonally but I have confirmed this again this week 13th July 22 (having previously photographed in the Autumn).

## Purpose 4

Will not impact on the special character of historic towns. ARUP has chosen one specific issue for all Croft sites

The site does not cross an important view point of the Croft parish church

Standing on Mustard lane either on the west or east side standing by the school playground there is a clear view of Croft parish church spire as this is present in summer and winter WBC need to reassess this I have sent photographs previously to prove this. Houses will block this view.

My greenbelt assessment OS1 002 ignores the fact that the overgrown site is not open and is not visible from any side to the public

It has 3 hard borders on 3 sides(Mustard lane sandy lane and heath lane but has houses along the south side x 5 (sandy lane) with no further area for infill with fences at the rear..On the east side(Mustard lane) there are 3 houses with fences and no further area for development apart from the site 002.

To the west there is Heath lane a hard border.

There is no possible area for encroachment on the south west or east apart from the houses' small gardens.

To the north is a well established hawthorn hedge There is only one house on the northern border not several as stated by ARUP .This well established and could be regarded as a hard border.

The land is unused and desolate except for a small lawn

ARUP have called the south and east borders moderate durability but if the land were developed there could be no development of the properties surrounding the site on 2 sides as there is no land for development apart from the application site.

There are very few sites bounded by 3 roads and be considered open yet my site is regarded as strong green belt despite 3 roads and a very enclosed site .that has not been used for many years.

Concerning the Heath croft stud site I do not feel the amount of traffic currently using the site for equestrian purposes including some large horse boxes is greater then up to 120 cars leaving and returning

I feel my issues can come under mainly question 8

I clearly feel my site has much stronger borders on 3 sites and that Heath croft stud has massively weak borders

My site is not open.It cannot be seen from the road.or anywhere else.(views from space cannot define terrestrial visibility

Question 12 Was the methodology applied to site selection appropriate and were the conclusions justified?

not in my opinion.The text of Heathcroft stud green belt assessment describes poor borders and calls it a moderately /weak open site open site

yet I have taken photographs walking around the site with clear views of horses in the fields.While my site is called open and photos of my site externally only show hedges.I think it is time to scrap the IT of google for site visits as I have no confidence in ARUPS google assessments!

Question 15 As above

Question 16.Did WBC check a proportion of green belt assessments for accuracy and comparison.

Much of my information has been previously provided including many photographs on 2 occasions.and I would be grateful if you could review this.

Obviously I have spent many hours personally doing the research in relation to my site but I obviously feel I was miss advised by WBC and that employing an expensive planning advisor is the only way to compete with huge building firms like Bellway..

yours sincerely  
Dr Clive Freeman.