



# Hearing Statement on behalf of Mr & Mrs Carl Hickman (UPSVLP 2482)

In relation to: Matter 6f – Main Development Area: South  
East Warrington Employment Area

Warrington Local Plan Examination

Emery Planning project number: 19-202

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Project : 19-202  
Site address : Warrington Local Plan  
Client : Wainhomes (North West) Ltd

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## 1. Introduction

1.1 Emery Planning is instructed by Mr & Mrs Carl Hickman to submit a written response to the Inspector's Matters, Issues and Questions in relation to Matter 6f – Main Development Area: South East Warrington Employment Area of the Warrington Local Plan Examination. Mr & Mrs Hickman have an interest in the following omission site:

- Bradley View, Cliff Lane, Warrington (Omission site profile: 51)

1.2 This hearing statement should be read in conjunction with our detailed representations to the Regulation 19 Pre-Submission Draft of the Warrington Local Plan.

## 2. Mr & Mrs Hickman's response to the Inspector's questions

### Questions 1 & 2

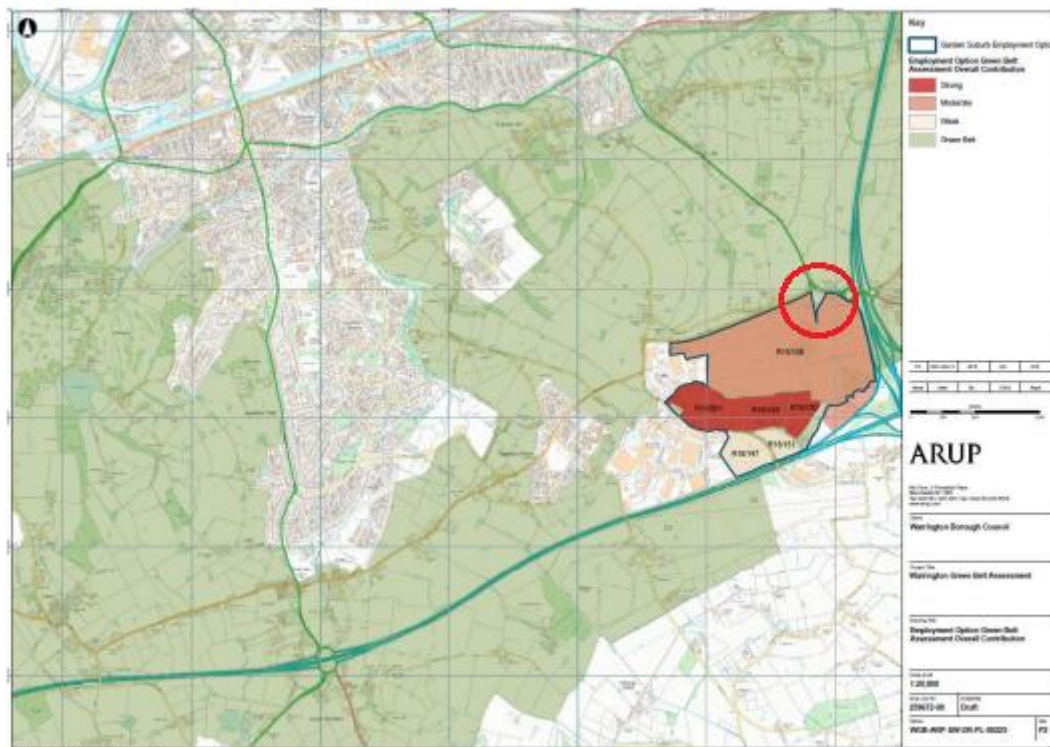
#### **What is the background to the site allocation and how was it identified?**

#### **What is the basis for the scale of development proposed and is this justified?**

- 2.1 We agree to the South East Warrington Employment allocation in principle. The development is justified and will help to address the significant shortfall in employment land in the Borough. However, we consider that the identified scale of the development is illogical as it excludes our clients site, leaving a parcel of Green Belt land surrounded by the development on two of its three sides. Please refer to Appendix EP1 of our Regulation 19 Representations.
- 2.2 Our clients' site was previously included in the wider garden Suburb allocation in the 2019 Proposed Submission Version Local Plan, however, has since been removed. There is no justification provided as to why the site has not been allocated as part of the standalone South East Warrington Employment allocation. The Omission Site Profile (CD03) simply states that "*Mr & Mrs Hickman's site no longer forms part of this allocation*".
- 2.3 The site as allocated means that our clients' land is now surrounded by permanent development on all sides, including the significant road infrastructure to the north. Exceptional circumstances therefore exist to release it from the Green Belt as it no longer serves a Green Belt purpose and the boundaries are clearly defined.

2.4 This is abundantly clear from the extract of Figure 10 of the Green Belt Assessment that the site would form a logical rounding off of the proposed allocation.

Figure 10. Sites within the Employment Option



2.5 The site was not assessed as a standalone proposed allocation but bears near identical landscape or visual characteristics to the parcel assessed as R18/106. Had this assessment taken place, it is reasonable to conclude that Arup would have found that, at the present time, our client's site, like much of the remainder of the SEWEA site, forms a "moderate" contribution to the purposes of the Green Belt.

2.6 The scale of the proposed development is therefore not justified, as an expansion to include Mr & Mrs Hickman's site would form a logical extension and would help to accommodate further employment land to meet the Borough's needs.

**Question 4 - What are the conclusions of the Green Belt Assessment in relation to the contribution of the land in question to the purposes of the Green Belt and the potential to alter the Green Belt in this location?**

2.7 The Green Belt Assessment fails to consider our clients' site to the north of the employment allocation. There is potential to further alter the boundaries of the allocation to include this land.

2.8 We consider that the employment allocation as proposed would fail the purposes of the Green Belt, as it would leave an island of Green Belt land which would not fulfill these purposes.

2.9 Paragraph 143 of the Framework identifies the purposes of the Green Belt. We would specifically refer to the following:

- not include land which it is unnecessary to keep permanently open.
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

2.10 Furthermore, the Green Belt Site Selection report (GB3) states:

*"The remaining surrounding Green Belt could continue to perform its Green Belt function"*

2.11 The employment allocation itself fails both purposes as it does not include our clients' land which is now unnecessary to keep permanently open. The boundaries to the south of our clients site would not be clearly defined. Given that the site at Bradley View itself would no longer serve any purpose of the Green Belt as defined in national policy, it is logical for the allocation boundary to be altered further and released from the Green Belt.

2.12 The Green Belt Site Selection report (GB3) refers to the site being "well defined along strong permanent boundaries to the north, east and south (the M6, M56 and the B5356)". Policy MD6 paragraph 10 also states:

*"10. The Green Belt boundary is defined by Grappenhall Road to the northern boundary, the M6 to the east and the M56 and Bradley Brook to the south."*

2.13 We strongly disagree with both statements. The policy is not consistent with the proposals map as the north-east corner of the allocation is clearly not fully defined by Grappenhall Road due to the omission of our clients' site.

2.14 Overall, the Green Belt Assessment is not accurate and fails to assess the effects of the employment allocation on the Green Belt land at Bradley View. We would strongly recommend that the proposals map is revised to include our clients' site in order to ensure the SEWEA boundaries are clearly and permanently defined. Alternatively, our clients' site should be removed from the Green Belt even if not included within the proposed allocation as it would no longer serve its purposes.

### **Question 17 - Are any main modifications necessary for soundness?**

2.15 Yes.

2.16 Based on our response to Question 4 above, we would request that paragraph 10 of Policy MD6 be amended for clarity to state as follows:

*"The Green Belt boundary is defined by Grappenhall Road and Cliff Lane to the northern boundary, the M6 to the east and the M56 and Bradley Brook to the south."*