

Dear Sir and Madam.

I have already made comments on Matter 3 in relation to my site OS1 R18/P2002 in relation to the spatial strategy and the rejection of my site after my application in the second wave in August 2017. The initial applications commenced from October 2016..

My site was rejected in April 2019 and did not even make it to the online sites map for OS1 before elimination for being too strong in the 5 purposes of green belt which I certainly do not agree with in any way.

My ARUP green belt assessment was in July 2018 but I was not informed of the rejection(omission) until April 2019. The selected site had 3 reference numbers(3155 R18/095 and R18/P2/056) and had its green belt assessment in July 2017 and was able to produce a 43 page promotional document with the green belt assessment in September 2017 18 months before I knew about my omission.

I feel the Heath Croft stud application( was being prematurely progressed with a lot of communication with the building firm (Bellway) and planners( How) before all the later sites had been assessed .properly( R18/095)

None of this was addressed by WBC in the first review in 2019, the only comment on line I saw was that some omission applicants had stated their sites merited inclusion and in the second review I received my reference number of 0329 in June this year with a short redacted summary of my concerns

In summary I have no confidence in the ARUP assessments for the 5 purposes of green belt or their assessment of openness or in the classification of weak or strong(Durable) borders. as per the WBC green belt assessment document eg Para 85 of NPPF boundary definitions. I would also like to bring up the size of sites as strategic planning authorities need to consider small sites of less than one hectare under para 68 and 69 of the NPPF for 10 % of sites. in the LDP.( question 4 in Matter 8)

I emphasize my concerns as in the document re green belt release that states in the section on the Warrington urban area garden suburb extension that 11 sites have been assessed by ARUP as having either a weak or moderate contribution to green belt. Most of these sites are in open green fields and I cannot except that they are all valid. with no sites assessed as strong for green belt in open countryside

I am not supposed to compare green belt assessments one site(002) against the selection site(095) but it is the only way to make my points. against the ARUP assessments.

One manager confused me in one email(17/4/2019) thinking my site was in Culcheth (7b) which gave me little confidence but again as with Croft, Culcheth has only one site with an allocation of 200 green belt houses on the Lions Den site which I know well from the 1970's It appears WBC has been going for the easy option of just one site in most areas rather than thinking outside the box. with smaller sites

In considering the sites in Croft most sites are encroaching on the central built up area of Croft like 095 115 127 155 or fields off a road with only one durable ROAD border eg a ridiculous application 18/129 by Peel holdings (for half of croft.), 099 032 098 052 096( small) 093 031.

All these applications are mainly farm land for grazing and some for crops .My site did not even get on the site map until after rejection yet my site is the closest to the northern border of the croft inset map 1984 which includes all the houses on Sandy lane north and 2 houses on Mustard lane east above sandy lane going north.

Encroachment.

Having lived in Croft for over 30 years until I commenced working in Stockton Heath (having to live locally related to work) I have seen most of the development over the last 70 years. owning the shared land in croft

In the 60's Croft primary my first school was moved from,Croft heath to land belonging to Heath farm for the new primary school off Mustard lane east

Croft Heath unfortunately was built on rather than being kept as a green space next to the village hall which was modernised in the 60's

In the 80-90s Heath farm, the same site off Mustard lane and Lord St east were developed for the large building areas of Abbey close and Deacon close with probably over 130 houses

.Some of this development appears to have been in the 1984 inset village map including some of the other site the petrol station and garage owned by a previous Warrington mayor...

I do not know when Heath stud was built but the family bred horses before Heath farm was demolished for building in the ? early 80's The breeding business started in 1977.so the large equestrian building was probably also built in the 1980's

Most other developments in Croft like new lane and Bettysfield drive were probably built in the 60' s .Otherwise it has been mainly infill sites although an old army site was developed on Lady lane some years ago.

One LDP was cancelled and changed to the UDP plan and I applied for both of these for my site but although 2 sites on Lady lane and the ?battlefield site were proposed no land was needed in green belt villages for the UDP plan. I know of no battles in Croft but I think this was near Lady lane

As no green belt loss was needed this is the first LDP since 2003 and so the strategic planning authority have just chosen the simplest and most straightforward answer and that was to extend( encroach) on the last development in the 1980s to 1990's.in exactly the same area on the Heath farm site

The planning permission for the equestrian business was probably given in the early 80's on land that was not used for building but was still part of Heath farm land.

I can understand why Warrington gave planning permission as Heath farm was already breeding horses before it was demolished and nothing could be closer to green belt but not green belt than an equestrian business but the problem was the massive building for stabling(Livery) exercising, training etc and the stud business.

This is still an active business with only a maximum of 30 % build in the large equestrian building and a few much smaller buildings. so they are supposed to assess different parts of the site namely 70 % green belt consisting of green fields of open visible green belt and some exercising areas of easily removable gravel. instead of encroaching more land to building the same area as the last major build.

This business will only cease sometime after it is converted into building land .It is not a true brownfield site which usually applies to derelict and industrial land but not always but they cannot argue this is not encroachment as 70% of the usage is green belt grazing and exercise areas for thoroughbred horses. so why should this be converted to building land.

It is certainly not the NPPF golden thread of planning which How planners think it is...If you are concerned about the large building still currently in use then discuss demolishing the building which presumably is under agricultural permission and allow a possible build on this 30 % site but this could make Bellway drop them like a stone. with a small site.

As I have previously said if Stables ith agricultural permission hear about this they will follow using this as a precedent for conversion to building status. It is already very common

for Stables to apply for conversion to housing having already built accommodation over the stables( eg burley Heyes stables Arley Rd. Appleton Thorn 2021)

Bellway and How have managed to persuade that this is a planning gain and akin to the use of a Brownfield site and I do not feel it should be considered under NPPF para 145 g as it will have a greater influence on the openness of green belt than the existing business as 70% is open fields with open countryside and clear views. with only 30% commercial building Please look at the chosen sites description on the site selection document for R18/095 Heath croft stud

Existing use **THIS SITE IS OPEN COUNTRYSIDE HOWEVER IT INCLUDES HEATHCROFT STUD**

This is because 70% of the site is beautiful green belt fields with thoroughbred horses grazing clearly visible from the north and east of the site if walking from Abbey close to the parish church along the scenic weak border of the tree tunnel pathway to the south of the site.

Pathways are weak borders **NOT STRONG**

Why does the ARUP green belt assessment totally contradict the simple description by WBC. This is not a hidden brownfield site.

#### Traffic

This site will cause traffic movements of 70x2 cars with 2 cars per family without any driving teenagers to 20s.This could be 280 movements per day down Deacon and Abbey close without extra school runs.

I have asked Croft parish council in the past if there had been any complaints about Horse boxes or smell in relation to Heath croft stables and they said no.I do not believe as Bellway and How have stated that the movement of Horse boxes is anything like 280 movements a day. Many horses are stabled there and will only go out infrequently.

#### Infrastructure

I was told by one of the officers that it was not just in relation to green belt assessment that 095 was chosen but because of the existing infrastructure of access roads and utility services. I believe this to be innacurate.If this was the case councils would always extend existing areas for convenience and this is what will cause encroachment. and higher levels of traffic onto Lord St.

.  
If the next area of land south of the chosen site were chosen then Abbey close would join up with Bettysfield drive to the south.

#### Green belt assessments by ARUP

There is something confusing in the green belt assessments .The NPPF says that all 5 purposes carry equal weighting yet ARUP mainly stresses purpose 3 or c " to assist in safeguarding the countryside from encroachment" but the WBC document " Implications of green belt release" states on 3.2 assessment criteria

As purpose 5 relates to the role of green belt in encouraging urban regeneration it will therefore not be assessed..

I do not understand this as the assessments all have purpose 5.

I have done a site comparison with 002 my site and 095 the selected site purpose 1 or a

"To check the unrestricted spread of large built up areas." 002 no contribution 095 no contribution

purpose 2 or b

"to prevent neighbouring towns merging into one another"002 weak contribution 095 weak contribution

purpose 3 or C

"To assist in safeguarding the countryside from encroachment"002 Strong contribution 095 Moderate contribution \*\*\*\*\*

purpose 4 or d

"to preserve the character of historic towns"

In this purpose ARUP has chosen one criteria for Croft.This Is the site is not adjacent to a historic town. The site does not cross an important view point of the parish church 002 no contribution 095 no contribution

purpose5 or e

"to assist in urban regeneration encouraging the recycling of derelict land and other urban land" 002 moderate contribution 095 moderate contribution

On the basis of this it appears the sites are equal but for purpose 3 where 002 is given a strong contribution with 095 a moderate contribution

On this basis my site 002 was classified as very strong for green belt with 095 classified as weak with omission of my site

I totally disagree with purpose 3 which I will address afterwards

Going back to purpose 4 which I have previously explained to WBC and which they have ignored. Arup have chosen this with WBC concernig the view of the croft parish spire which will be blocked by this development at an important viewpoint

I have photographed on two occasions clear views of croft parish church overlooking the school playground at the level of the parish hall on Mustard lane. This is visible from both the east and west side of Mustard lane.

I understand they will try to wriggle out of this.

The view will be much more prominent in the Autumn and winter months but is clearly visible in the summer

If this is accepted the NPPF states that all purposes are equal which would negate the purpose 3 difference between the 2 sites.I suppose they will try to say this is not an important viewpoint but it is outside the village hall and would be visible to staff, parents and children at croft primary school as well as people walking down Mustard lane

Going back to purpose 5 To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Site 002 I am afraid to say is about 80 % derelict with overgrown vegetation and many trees and bushes left to grow wildly. It has not been used for agriculture for over 75 years or more .Most tree species are not protected including potentially dangerous large Manchester poplars and many Lombardy poplars..20 percent is a mown lawn previously a lawn tennis court in the

50's and 60's and possibly not green belt?? but certainly a lawn for over 70 years .It is not visible from any of the 3 roads surrounding the site .It has a huge mound of earth on the south side following building of a bungalow in the mid 80's by infill. on Sandy lane  
Basically this is far more derelict land than the active equestrian business of Heathcroft stud.I would thus argue that this is far more " brownfield" than 095 and should be considered as STRONG in recycling derelict underused land for housing

So I feel my site has been totally wrongly assessed by ARUP.  
It is totally enclosed and not visible to anyone from any boundary  
It is not open and has no long views  
It is neglected 80 % and is in a disgraceful state The access road from Sandy lane is not passible for vehicles at present.  
If the site were ever developed it would be from Heath lane and the hedge would be dropped.

### Boundaries

I am totally confused by ARUPS boundary assessments..as.I have fully read the guidance and although it states they have to work some assessments personally I feel that has totally skewed both assessments..

How ( planners)also say that it's northern border is Mustard lane which is wrong .Heath lane is due north .Mustard Lane is going north easterly but only by about 20 degree. so above the northern border of 095 are hundreds of acres of green belt fields with only weak hedges to prevent encroachment

My site is extremely unusual in green belt protection in that it has the most durable borders on 3 sides .On the west side is Heath lane with a well established tall hedge and this is DURABLE

On the south and east borders there are 5 houses and 3 houses respectively with no vacant space for infill with gardens to the rear for 4 houses and no rear garden for one on Sandy lane and on Mustard lane the 3 gardens all have established hedges and no areas of land for development.

Thus the site has hard borders on 3 sides with no land to be developed on all 3 sides because of 3 hard borders. If my site were chosen all the land would meet with the 8 house and there would be NO risk of encroachment because of 3 hard durable borders to the west is Heath lane a hard border

To the south Sandy lane. a hard border and to the east Mustard lane a hard border.

ARUP has turned 2 Of these hard borders into less durable just because there are 2 borders which have no room for any development apart from 002.

The border to the north consists of a thick well established hawthorn hedge with a dip in the ground .In front of that is a thick woodland with many overgrown trees of varied non protected species mainly.In the wood is a captured derelict touring caravan totally enclosed by tree growth..Arup have wrongly stated there are a group of houses along this border .There is fact only one in the north west corner and a well established hedge can be regarded as a strong border.

Arup has turned 3 strong borders with 3 MAIN roads into weak borders in total contrast to the nonsense of borders in the 095 assessment

Borders durable Rushcliffe 2014 roads/ railway/Rivers/ridgelines/relative positions of built up areas

Rotherham. motorways public roads river stream.Existing development with strong established boundaries\*\*\*\*\*

Chester west and chester. roads are strongest  
MATURE hedgerows when no roads

On this basis ARUP has ignored 2 hard borders ie main roads are the strongest border apart from rivers and motorways because of strong development fences and hedges in gardens on the south and eastern border apparently ignoring the road borders. If the land were to be developed by 002 where would these houses encroach. No where as there would be no land to encroach. It has called the northern border close to residential houses on Mustard lane which is not true with only one house in the north west corner. The established hedge would be considered durable with the Chester and west Cheshire methodology.

I thus feel my site has 4 hard borders and compared to 095 is more like Fort Knox.

My site does not have a strong- moderate degree of openness. It cannot be seen from outside the site whereas 095 has 2 totally open sides from the north and east with hundreds of acres of open field to the north and east and is called open in the site description. on the chosen site proforma. by the council.

I am totally amazed by the green belt assessment of 095. to me looking at boundaries again it,'s strongest boundary is with the primary school playing field and Deacon close houses which is called non durable yet mustard lane is fairly close and it is very unlikely the school would sell it's only grassed play area and why would Deacon close residents extend there gardens into private land .They have not done so over the last 30 years or so..It claims the boundaries with the countryside are of mixed durability but does not name them .They appear to have ignored hundreds of acres of greenbelt land are only protected by weak fences on the north and east side of the site with no hedges all the way to the Parish church in the east and fields only going north east up mustard lane along way almost to Lady lane in Littletown.(aregion of croft)

It then names the borders and states that both the northern boundary is non durable with a field boundary with intermittent tree line which is not durable and then states that the eastern boundary is non durable with an unmarked field boundary. which is not durable.

It states the southern border which is a scenic path from Abbey close to the parish church is a strong boundary with a hedge lined made footpath.

In the green belt assessment document under 77 it states that soft boundaries lacking durability can be private unmade roads or tracks/irregular boundaries/disused railways and footpaths accompanied by other physical features eg a hedge

This means that the south pathway may not be protected from building on the other side of the path where there is only one large field between the path and Bettysfield drive.to the south

It also states the site is open but views re restricted by the built form but there are long line views..It states that the non durable borders would not prevent encroachment having stated 3 are weak and only one durable but the protocol suggests the southern path could be a soft boundary which is recognizable but with lesser permanence. It is probable that this scenic path has already been shortened by the development of Abbey close in the 80's

It then states that with 3 if not 4 weak borders that it is a weak contribution to green belt having stated it can be encroached.

This site is very open especially from the north and east and from the entrance on the south. I do not see how this site is regarded as weak for green belt as the assessment is totally inconsistent with the facts

I have sent several photos taken from weak borders in the north and east showing open views of thoroughbred horses grazing. It has not got a moderately weak view of openness  
All these issues relate to questions 1 2 3 4 5 6 7 9 14 in matter 7 a

I hope you see that the green belt assessments are not viable. Heathcroft stud has apparently 4 weak borders if I include the south otherwise 3 and to me is very open and scenic. Proven by photographs all taken outside the site yet is called partially enclosed by ARUP... This should have a strong green belt assessment. but as it is the chosen site it does not appear to be assessed appropriately

My site Land north of Sandy lane and east of heath lane has 3 or 4 strong borders as we HAVE 3 Main roads around the site with continuous houses around the south and East sides with no options for any development except the site 002. yet my site is called strong for green belt yet is neglected with no agricultural usage. and 3 borders are assessed mixed durability

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