



Warrington Local Plan Examination in Public: Hearing Statement

Matter 7d: Lymm Allocations

On behalf of Richborough Estates Limited.

In relation to land at Cherry Lane Farm, Lymm

Participant ID: 0430

August 2022

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Version 2

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1 INTRODUCTION

1.1 Asteer Planning LLP has been instructed by Richborough Estates Limited (“Richborough”) to prepare this Hearing Statement in relation to the Updated Proposed Submission Version Local Plan (“SVLP”) and the Matters, Issues and Questions (“MIQs”) posed by the Inspectors.

1.2 Richborough controls the site at Cherry Lane Farm in Lymm (Site Number: 0430¹) which has been promoted through the Local Plan process since 2017. The site is wholly deliverable (being suitable, available and achievable) for residential development and could deliver significant public benefits, as demonstrated robustly by the evidence presented in duly made representations in June 2019 and in November 2021 (Rep ID number: 0430/07).

1.3 In relation to Matter 7d, the Inspectors have raised the following issue:

“Whether the site allocations at Lymm (Policies OS4 and OS5) are justified, effective and consistent with national policy.”

1.4 This Statement responds directly to the Inspectors’ MIQs; however, it should be read in parallel with previous representations. Separate statements have been prepared in respect of the following matters and should be read in conjunction with this statement:

- Matter 3 (Spatial Strategy)
- Matter 4 (Housing Need);
- Matter 6a (Warrington Waterfront);
- Matter 6c (Fiddlers Ferry);
- Matter 8 (Housing Land Supply); and
- Matter 9 (Other Housing Policies);
- Matter 14 (Monitoring and Review).

¹ Omission Site Ref 22 (SHLAA Ref: 2705, Site Refs: R18/051, R18/101 and R18/P2/024)

- 1.5 It is our view that, for the reasons set out in this statement, that the approach to site selection and the Council's Green Belt Assessment ("GBA") in Lymm has been inconsistently applied.
- 1.6 Richborough considers that Lymm is a key settlement for growth and has the ability to support substantially more housing to meet the needs of the Borough. Deliverable sites in highly sustainable outlying locations will support the delivery of homes early in the Plan Period, helping the Council to meet its overall requirement and 5 year housing land supply.
- 1.7 If a re-assessment of sites or a review of Council's Green Belt Assessment is undertaken via any Main Modifications, then the assessment of Cherry Lane Farm should be revisited based on a review of the purposes of the Green Belt at Cherry Lane Farm and a Sustainability Appraisal for the site that we include in Matter 3 (Spatial Strategy).

2 LYMM ALLOCATIONS

Q1. What is the background to the site allocation and how was it identified? Q2. 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?

2.1 Our response to this question relates to both proposed allocations in Lymm (OS4 and OS5) and focusses on the site selection process and Green Belt Assessment (“GBA”) that has informed site selection in Lymm.

Context

2.2 Our response to Matters 3, 4, 6a, 6c, 8 and 9 consider the need for Main Modifications to the Local Plan due to uncertainty around:

- The assumptions, capacity and level of development envisaged in the urban area;
- The overall housing requirement and stepped housing trajectory with an over-reliance on strategic sites, when considered in the context of economic growth, job creation and a worsening affordability crisis; and
- The assumed trajectory and rate of delivery of homes within major strategic allocations, including Warrington Waterfront and Fiddlers Ferry, due to inherent constraints and infrastructure requirements that could significantly lengthen lead-in times to development.

2.3 In this context, if additional sites are required through Main Modifications, the spatial strategy should consider additional growth in outlying settlements which have excellent existing services and facilities, such as Lymm. Any re-assessment of sites in outlying settlements should apply a consistent and appropriate approach to site selection and GBA, as set out below.

Site Selection & Green Belt Assessment

2.4 It is Richborough’s view that the site selection process has not been consistently applied during the plan making process and, if any further sites are required to be identified, then Cherry Lane Farm should be re-assessed.

2.5 Richborough disagrees with GBA and considers that an re-assessment of the purposes of the Green Belt in Lymm would suggest that Cherry Lane Farm has a lesser impact on the Green Belt than Pool Lane (OS4) and a draft allocation at Massey Road (this site was proposed for allocation and therefore passed the site selection test, but was ultimately

removed at the request of the landowner) – as set out in Table 2.1. As such, the site selection process is inconsistently applied and did not allow Cherry Lane Farm to be fully assessed as part of the site selection and Sustainability Appraisal process (due to the rejection of sites that were considered to make a ‘strong’ contribution to the Green Belt).

2.6 Table 2.1 sets out a comparative analysis of the GBA for sites in Lymm, as well as Richborough’s Green Belt assessment for Cherry Lane Farm.

Table 2.1: Green Belt Comparative Assessment

GB Purpose	Pool Lane (OS4)	Rushgreen Road (OS5)	Massey Brook Lane ²	Cherry Lane (WBC)	Cherry Lane (Richborough)
1	No Contribution	No Contribution	No Contribution	No Contribution	No Contribution
2	Weak Contribution	No Contribution	Weak Contribution	No Contribution	No Contribution
3	Strong Contribution	Moderate Contribution	Strong Contribution	Strong Contribution	Weak Contribution
4	No Contribution	No Contribution	No Contribution	Strong Contribution	Weak / Moderate Contribution
5	Moderate Contribution	Moderate Contribution	Moderate Contribution	Moderate Contribution	Moderate Contribution
Overall	Moderate Contribution	Weak Contribution	Moderate Contribution	Strong Contribution	Weak Contribution

2.7 In relation to Purpose 4, the arbitrary approach that assigns a ‘strong contribution’ to land which is within 250m of conservation area is flawed. Simply because a site is adjacent to a Conservation Area does not, by default, result in a strong contribution to the Green Belt, and therefore the omission of a site from the site selection or Sustainability Appraisal process.

² Site removed at the request of the landowner.

- 2.8 Whilst the 250m is a useful barometer to determine the proximity of sites to a Conservation Area, this approach alone does not determine the contribution a site makes to preserve the setting and special character of historic towns.
- 2.9 Richborough considers that Lymm is a key settlement for growth and has the ability to support substantially more housing to meet the needs of the Borough. Deliverable sites in highly sustainable outlying locations will support the delivery of homes early in the Plan Period, helping the Council to meet its overall requirement and 5 year housing land supply.
- 2.10 If additional sites are required to be identified / allocated through Main Modifications and a re-assessment of sites or the GBA is undertaken in Lymm, then the assessment of Cherry Lane Farm should be revisited based on the above and a Sustainability Appraisal for the site that we include in Matter 3 (Spatial Strategy).