Warrington Borough Council **Green Belt Site Selection**Implications of Green Belt Release

Final for Issue | 26 August 2021

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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1 Introduction

1.1 Overview

Following on from the consultation in 2019 on the Proposed Submission Version Local Plan under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, the Council has undertaken a comprehensive review of the options for the Plan's spatial strategy. This has included a re-assessment of all sites submitted for consideration through the Local Plan process and an update of the supporting evidence base. This report summarises the implications for the Green Belt resulting from the proposed allocations in the updated 'Proposed Submission Version Local Plan'. This takes into account any harm to the function and integrity of the Green Belt and the resultant Green Belt boundary.

The Green Belt assessment evidence remains unchanged and therefore this report should be read in conjunction with the original Green Belt Assessment (October 2016), the Addendum Report (June 2017), the Green Belt Assessment Additional Site Assessment Report (July 2017) and the subsequent Green Belt site assessments for the remaining Call for Sites and SHLAA sites (July 2017, May 2018, and November 2018). It should be noted that the Council will be combining all of the previous assessment work into a Green Belt Site Assessments Collated Report, to be published as part of the consultation on the updated Proposed Submission Version Local Plan.

1.2 Structure

This report is structured as follows:

- Section 2 considers national policy and the approach adopted by other local authorities:
- Section 3 sets out a method for considering the implications of release on the Green Belt; and
- Section 4 sets out the assessments of the implications of releasing the proposed allocations from the Green Belt.

2 National Policy and Good Practice

2.1 Overview

National policy and guidance on Green Belt was previously set out in the original Green Belt Assessment (October 2016) however it is reiterated here as a reminder and also particularly given that the revised National Planning Policy Framework (NPPF) was published in February 2019 and more recently in July 2021. The overall aims and purpose of Green Belt designation remains the same in the revised NPPF.

This section also considers the approaches adopted by other local authorities where Green Belt sites have been proposed for release.

2.2 National Planning Policy Framework (July 2021)

Paragraphs 137 and 138 of the NPPF sets out the role and purpose of the Green Belt, as follows:

"137. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

- 138. Green Belt serves five purposes:
- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."

Paragraph 140 states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. Paragraph 142 adds that: "Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land."

When defining Green Belt boundaries, paragraph 143 requires plans to:

"e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and

f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."

2.3 Good Practice Review

This section considers the approaches adopted by other local authorities where Green Belt sites have been proposed for release including how the Planning Inspectors at the Local Plan Examinations in Public have considered the matter when determining exceptional circumstances. Appendix A sets out the detailed good practice review which considers the following recently adopted Local Plans:

- Nuneaton and Bedworth Local Plan (adopted 11 June 2019)
- Stevenage Borough Local Plan (adopted 22 May 2019)
- Guildford Council Local Plan: Strategy and Sites (adopted 25 April 2019)
- Kirklees Council Local Plan (adopted 27 February 2019)
- Barnsley Council Local Plan (adopted 3 January 2019)
- Cheshire East Local Plan Strategy (adopted 27 July 2017)

In terms of Green Belt implications, beyond the consideration of the outcome from a Green Belt purpose assessment, many of the authorities considered the following factors:

- Would development of the site affect the openness and purposes of the Green Belt?
- Impact of development of the site on the surrounding Green Belt and any cumulative impacts of releasing adjacent sites?
- The resultant Green Belt boundary and whether it would be clearly defined with features which are readily recognisable and likely to be permanent?

When concluding whether there was an exceptional circumstances case, all of the Inspector's Reports considered the impact of removing the site on Green Belt function and purposes and whether there would be a strong defensible boundary remaining. Some authorities did not specifically consider the impact of release on the Green Belt and instead focused on the site's existing contribution to the Green Belt with reference to their Green Belt Assessment.

3 Method

3.1 Overview

This section sets out a method for considering the implications of Green Belt release. There is no recognised approach as to how this should be assessed, and the good practice review demonstrated that most authorities simply applied a brief commentary referencing Green Belt purposes. Beyond the consideration of a site's existing contribution to Green Belt purposes, most of the local authorities considered the impact of removing the site on Green Belt function and purposes, alongside any potential cumulative impacts. Furthermore, the resultant Green Belt boundary and whether this would be readily recognisable and likely to be permanent was also a key consideration.

3.2 Assessment Criteria

Based on this, Table 1 below therefore sets out the qualitative criteria which will be used in the assessment. Only the proposed allocations in the updated 'Proposed Submission Version Local Plan' will be considered.

Table 1. Qualitative assessment criteria to consider Green Belt implications

Key Question to Consider	How will this be assessed?
What is the site's existing contribution to Green Belt purposes?	Strong / Moderate / Weak / No Contribution. ¹
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	This assessment will draw on the definitions and approach set out in the original Green Belt Assessment (October 2016) however it will consider <i>how development of the site would impact</i> upon the purposes instead of <i>how the site in its existing state contributes</i> to the purposes: Purpose 1 – would development of the site represent unrestricted sprawl? Purpose 2 – would development of the site result in the merging of neighbouring towns² or increase the potential for merging? Purpose 3 – would development of the site represent an encroachment into the countryside?

¹ See Green Belt Assessment Additional Site Assessment Report (July 2017) and the subsequent Green Belt site assessments for the remaining Call for Sites and SHLAA sites (July 2017, May 2018, and November 2018). Note that the Council will be combining all of the previous assessment work into a Green Belt Site Assessments Collated Report, to be published as part of the consultation on the updated Proposed Submission Version Local Plan.

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² The 'neighbouring towns' are defined in the original Green Belt Assessment (October 2016) at page 29.

	Purpose 4 – would development of the site impact upon the setting or character of a historic town ³ ? As Purpose 5 relates to the role of the Green Belt in encouraging urban regeneration, it will therefore not be assessed.
Are there any cumulative impacts (due to release of adjacent sites)?	This will only be relevant if a number of sites in the same area are proposed allocations. The cumulative impacts should apply the same considerations as above taking all sites together.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	Description of the resultant Green Belt boundary and whether it is recognisable and permanent.
Conclusion	A summary will be provided which will conclude on the Green Belt impact as follows: • Removal of the site (or sites, if cumulative) will harm Green Belt function and purposes. • Removal of the site will not harm Green Belt function and purposes.

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³ The 'historic towns' are defined in the original Green Belt Assessment (October 2016) at page 35.

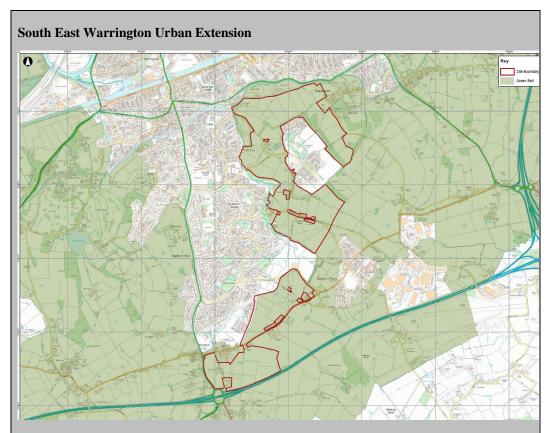
4 Assessment of Implications of Release

4.1 Overview

This section sets out the assessment of the implications of releasing the proposed allocations from the Green Belt. The sites in the Warrington urban area are considered first followed by the settlement sites. For the Warrington urban area sites, the proposed allocation boundary has been used given that the allocations incorporate a number of submitted sites.

For all of the settlement sites, the submitted site boundary has been used for the purposes of the assessment. It should be noted that the final allocation boundary may be slightly different compared to the submitted site boundary however the boundary assessed encompasses the full extent of Green Belt proposed to be released.

4.2 Warrington Urban Area



Context: The Green Belt Assessment Garden Suburb Options Report (April 2021) considered potential options for this allocation and assessed both the existing contribution to Green Belt purposes and the implications of Green Belt release for these options. The proposed allocation is broadly similar to Housing Option 2 however it represents a slightly different boundary as it was refined based on the findings of the report in order to provide a stronger Green Belt boundary.

Key Question to Consider	Assessment
What is the site's existing contribution to Green Belt purposes?	The proposed allocation encompasses a number of submitted sites which were all assessed for their individual contribution to Green Belt purposes. As set out in the Green Belt Assessment Garden Suburb Options Report (April 2021), the allocation includes the following sites: R18/088, R18/139B, R18/139C, R18/139D, R18/139E, R18/139F, R18/139G, R18/139I, R18/139J, R18/139K, R18/139M, and R18/139O. All of these sites made either a weak or moderate contribution to Green Belt purposes. As it is proposed to release the entire area as an urban extension, the allocation boundary shown above has been used to undertake this assessment rather than the individual submitted sites. It is noted that the allocation boundary above excludes a number of private properties as these will not be developed as part of the allocation however they will still be removed from the Green Belt.
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	Purpose 1 – Whilst entailing growth of the Warrington urban area, development would not represent unrestricted sprawl. Development would extend the urban area further south however the M56 provides a strong permanent boundary to prevent sprawl. As an urban extension it would be reasonably contained and well defined along a number of strong permanent boundaries (including the M56, B5356 Stretton Road and Blackcap Road to the south, Broad Lane to the east, and A49 Tarporley Road to the west). Development, particularly to the north of the site could constitute 'rounding off' of the settlement pattern. Development in this location would align with the historic context of the Green Belt and the intentions of the New Town Outline Plan (see Section 2 of the original Green Belt Assessment, October 2016). Purpose 2 – Development of the site would have no impact on preventing neighbouring towns from merging as it is relatively enclosed by the Warrington urban area. Although development would extend the urban area further south, there are no neighbouring towns to the south. Northwich is located over 7.5km away. Purpose 3 – Development of the site would entail an incursion into undeveloped countryside. Purpose 4 – Warrington is a historic town however the site is not near to the Warrington Town Centre Conservation Areas. The site does not cross an important viewpoint of the

Are there any cumulative impacts (due to release of adjacent sites)?

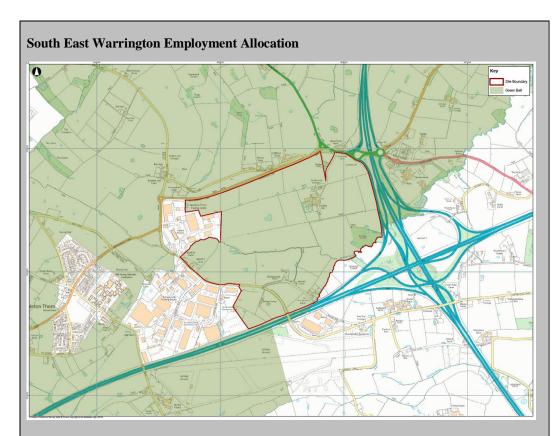
There are four allocations in total proposed for release around the Warrington urban area (South East Warrington Urban Extension, South East Warrington Employment Allocation, Fiddlers Ferry Site Allocation and Thelwall Heys Allocation).

The South East Warrington Employment Allocation and the Thelwall Heys Allocation are both also located to the south east of Warrington. Both of these allocations would be contained by strong permanent boundaries. Collectively, the release of these sites alongside this allocation would have a similar impact as set out above however it would represent a larger incursion into undeveloped countryside in this location. The remaining surrounding Green Belt could continue to perform its Green Belt function. Development would not harm the overall function and integrity of the Warrington Green Belt.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent? The new Green Belt boundary would be defined by the M56, B5356 Stretton Road and Blackcap Road to the south, Broad Lane, The Gorse woodland and further sections of dense woodland to the east, and A49 Tarporley Road to the west which represent recognisable and permanent boundaries. The remainder of the eastern boundary consists of sections of field boundaries and the south eastern boundary consists of a field boundary. These would need to be strengthened to create a new recognisable and permanent Green Belt boundary.

Conclusion

The sites which comprise this allocation made a weak and moderate contribution to Green Belt purposes. Development of this allocation would result in some encroachment into the countryside however development would not represent unrestricted sprawl as it would be reasonably contained by the existing urban area and well defined along a number of strong permanent boundaries. Development in this location would be consistent with the historic context of the Green Belt and the intentions of the New Town Outline Plan. The remaining surrounding Green Belt could continue to perform its Green Belt function. The removal of this site from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. The new Green Belt boundary would be recognisable and permanent being strongly defined to the south, west and east by the M56, B5356 Stretton Road, Blackcap Road, Broad Lane, A49 Tarporley Road, the Gorse woodland and further sections of dense woodland. Parts of the eastern boundary and the south eastern boundary which currently consist of field boundaries would need to be strengthened to create a new recognisable and permanent Green Belt boundary.



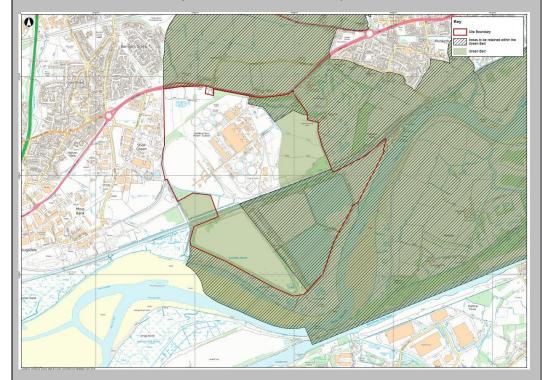
Context: The Green Belt Assessment Garden Suburb Options Report (April 2021) considered this allocation alongside an extended version of the site and assessed the existing contribution to Green Belt purposes. The cumulative impact of releasing this site alongside the housing allocation options was also considered. The boundary shown above remains unchanged from the Options Report.

Key Question to Consider	Assessment
What is the site's existing contribution to Green Belt purposes?	The proposed allocation encompasses a number of submitted sites which were all assessed for their individual contribution to Green Belt purposes. As set out in the Green Belt Assessment Garden Suburb Options Report (April 2021), the allocation includes the following sites: R18/061, R18/106, R18/147, R18/148, R18/150 and R18/151. These sites made a strong, moderate and weak contribution to Green Belt purposes. As it is proposed to release the entire area as an urban extension, the allocation boundary shown above has been used to undertake this assessment rather than the individual submitted sites.
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	Purpose 1 – Whilst entailing growth of the Warrington urban area, development would not represent unrestricted sprawl. Development would form an extension to the Appleton Thorn Trading Estate which is inset within the Green Belt. As an urban extension it would be reasonably contained and well

defined along strong permanent boundaries to the north, east and south (the M6, M56 and the B5356). Purpose 2 – Development of the site would have no impact on preventing neighbouring towns from merging. Purpose 3 – Development of the site would entail an incursion into undeveloped countryside. Purpose 4 – Warrington is a historic town however the site is not near to the Warrington Town Centre Conservation Areas nor does it cross an important viewpoint of the Parish Church. Are there any cumulative There are four allocations in total proposed for release around impacts (due to release of the Warrington urban area (South East Warrington Urban adjacent sites)? Extension, South East Warrington Employment Allocation, Fiddlers Ferry Site Allocation and Thelwall Heys Allocation). The South East Warrington Urban Extension and the Thelwall Heys Allocation are both also located to the south east of Warrington. Both of these allocations would be reasonably contained by strong permanent boundaries. Collectively, the release of these sites alongside this allocation would have a similar impact as set out above however it would represent a larger incursion into undeveloped countryside in this location. The remaining surrounding Green Belt could continue to perform its Green Belt function. Development would not harm the overall function and integrity of the Warrington Green Belt. Would a new Green Belt The new Green Belt boundary would be defined by the M6 to boundary be defined using the east, the M56 to the south and the B5356 to the north which physical features that are all represent recognisable and permanent boundaries. readily recognisable and likely to be permanent? Conclusion The sites which comprise this allocation made a weak, moderate and strong contribution to Green Belt purposes. Development of this allocation would result in some encroachment into the countryside however development would not represent unrestricted sprawl as it would be reasonably contained and well defined along strong permanent boundaries to the north, east and south (the M6, M56 and the B5356). The remaining surrounding Green Belt could continue to perform its Green Belt function. The removal of this site from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. The new Green Belt boundary would be recognisable and permanent being strongly defined to the north, east and south by the B5356, M6, and M56 respectively.

Fiddlers Ferry Site Allocation

The map below shows the existing areas of Green Belt. Not all of the Green Belt within the allocation boundary (shown in red) is proposed to be released. The areas proposed to be retained are shown below. The areas not marked as being retained are proposed to be removed from the Green Belt. The assessment below therefore focuses on the areas proposed to be removed from the Green Belt (referred to below as 'the site').



Context: The Fiddlers Ferry Green Belt Assessment Report (April 2021) considered this allocation and assessed both the existing contribution to Green Belt purposes and the implications of Green Belt release. It also explored mitigation of Green Belt harm and potential new Green Belt boundaries. The area proposed to be removed from the Green Belt reflects the recommendations set out in the report in terms of mitigating Green Belt harm and providing a stronger Green Belt boundary.

Key Question to Consider	Assessment
What is the site's existing contribution to Green Belt purposes?	The area proposed to be removed from the Green Belt encompasses a number of Green Belt parcels which were assessed as part of the Green Belt Assessment (October 2016). This includes parcel WR73 (western half of parcel only), WR74, and WR79 (southern section of parcel only). WR73 and WR74 were assessed as making a moderate contribution to Green Belt purposes and WR79 made a strong contribution to Green Belt purposes.
What is the impact on Green Belt function and purposes	Purpose 1 – Development of the site would not represent unrestricted sprawl of the defined large built-up area as the site

of removing the site from the Green Belt?

is connected to Widnes and is not connected to the large builtup area of Warrington.

Purpose 2 – Development of the site would reduce the separation between the Warrington urban area and Widnes, and to a lesser extent between Widnes and Runcorn (as the gap is already narrower to the west). In relation to the northern section of the site, the remaining Green Belt to the south of the A562 Widnes Road and to the east of Marsh Lane would continue to provide a degree of separation. In relation to the southern section of the site, development would reduce the separation between Widnes and Runcorn in this location however the gap between the towns is already narrower elsewhere. Furthermore, the remaining Green Belt to the south, combined with the River Mersey and the Manchester Ship Canal would ensure that separation is maintained in this location. Development would not result in these neighbouring towns merging.

Purpose 3 – Development of the site would entail an incursion into predominantly undeveloped countryside. The area to the north of the St Helen's Canal and the railway line is undeveloped consisting of agricultural land. The area to the south of the railway line includes ash lagoons associated with the former power station use.

Purpose 4 – The site is adjacent to the historic town of Widnes however it is not within 250m of its Conservation Areas.

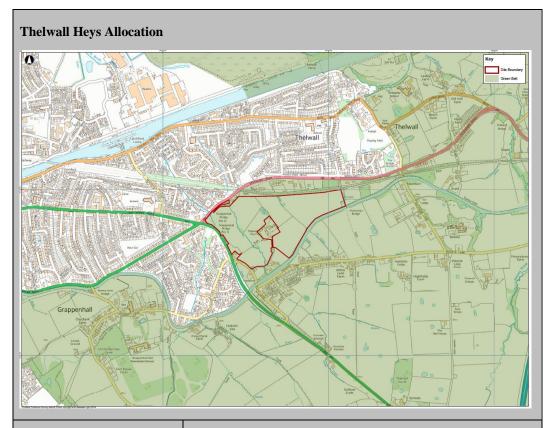
Are there any cumulative impacts (due to release of adjacent sites)?

There are four allocations in total proposed for release around the Warrington urban area (South East Warrington Urban Extension, South East Warrington Employment Allocation, Fiddlers Ferry Site Allocation and Thelwall Heys Allocation).

None of the other sites are located in close proximity to the proposed allocation. Collectively, the release of these sites alongside this allocation would have a similar impact as set out above however it would represent a larger incursion into undeveloped countryside around the Warrington urban area. The remaining surrounding Green Belt could continue to perform its Green Belt function. Development would not harm the overall function and integrity of the Warrington Green Belt.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent? The new Green Belt boundary would partly be defined by the dense wooded area to the north, and the St Helen's Canal and the railway to the south which represent recognisable and permanent boundaries. The south western boundary currently consists of the raised landform and existing access road around the outside of the dry lagoon. This would need strengthening to ensure permanence in the long term. The eastern boundary (in the northern section of the site) currently consists of Marsh Lane. Marsh Lane is a single lane road which is made in parts and therefore would require strengthening to ensure permanence in the long term. The eastern boundary (in the southern section

	of the site) currently consists of the Vyrnwy Aqueduct. This is not a visible feature however it provides a clear constraint to development and there are pylons running almost in parallel with it. A new boundary would need to be established in this location to provide a recognisable and permanent Green Belt boundary.
Conclusion	The northern section of the site makes a strong contribution to Green Belt purposes and the southern section of the site makes a moderate contribution to Green Belt purposes. Development of the site would result in some encroachment into the countryside however development would not represent unrestricted sprawl as it is not adjacent to the Warrington urban area. Development would reduce the separation between the Warrington urban area and Widnes, and to a lesser extent between Widnes and Runcorn. However a degree of separation would be maintained by the remaining Green Belt land to the south of the A562 Widnes Road, to the east of Marsh Lane and to the south of the dry lagoon, as well as by the physical constraints of the River Mersey and the Manchester Ship Canal. Overall, development would not result in neighbouring towns merging. The removal of the site from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. In order to create a new recognisable and permanent Green Belt boundary, the existing eastern boundary and the south western boundary would need to be established adjacent to the Vyrnwy Aqueduct to provide a recognisable and permanent Green Belt boundary. The southern boundary consisting of the St Helen's Canal and the railway, and the northern boundary consisting of dense woodland would represent recognisable and permanent boundaries.



Key Question to Consider	Assessment
What is the site's existing contribution to Green Belt purposes?	The proposed allocation consists of Site 1865 / R18/017 / R18/P2/019 which was assessed as making a weak contribution to Green Belt purposes.
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	Purpose 1 – Whilst entailing growth of the Warrington urban area, development would not represent unrestricted sprawl. Development would be reasonably contained and well defined along strong permanent boundaries to the south, east and north (Bridgewater Canal, Cliff Lane, All Saints Drive and the Trans Pennine Trail). Given the pattern of the built-up area, development could constitute 'rounding off' of the settlement pattern.
	Purpose 2 – Development of the site would have no impact on preventing neighbouring towns from merging as it is relatively enclosed by the Warrington urban area.
	Purpose 3 – Development of the site would entail an incursion into undeveloped countryside.
	Purpose 4 – Warrington is a historic town however the site is not near to the Warrington Town Centre Conservation Areas. The site does cross an important viewpoint of the Parish Church, this viewpoint is located further south on A50 Knutsford Road however development would have a limited impact on this viewpoint.

Are there any cumulative impacts (due to release of adjacent sites)?

There are four allocations in total proposed for release around the Warrington urban area (South East Warrington Urban Extension, South East Warrington Employment Allocation, Fiddlers Ferry Site Allocation and Thelwall Heys Allocation).

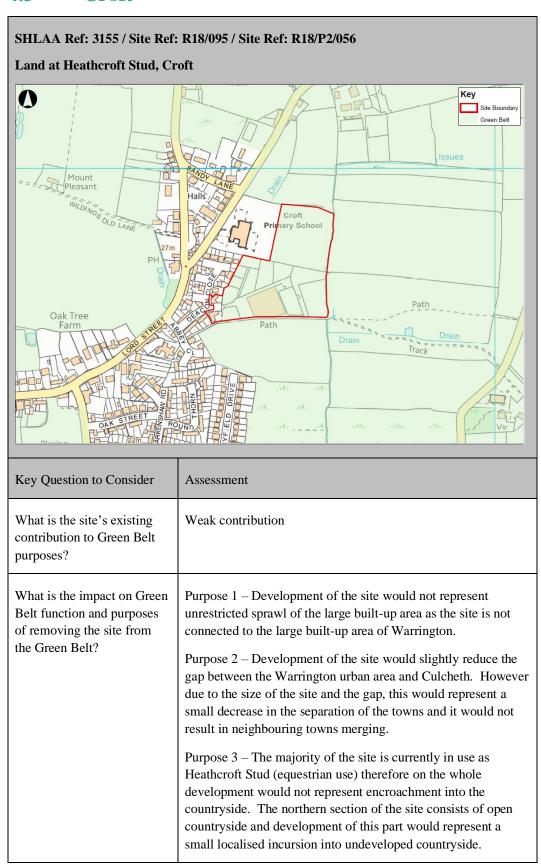
The South East Warrington Urban Extension and the Employment Allocation are both also located to the south east of Warrington. Both of these allocations would be reasonably contained by strong permanent boundaries. Collectively, the release of these sites alongside this allocation would have a similar impact as set out above however it would represent a larger incursion into undeveloped countryside in this location. The remaining surrounding Green Belt could continue to perform its Green Belt function. Development would not harm the overall function and integrity of the Warrington Green Belt.

Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent? The new Green Belt boundary would be defined by the Bridgewater Canal and Cliff Lane to the south, All Saints Drive to the east and the Trans Pennine Trail to the north which represent recognisable and permanent boundaries.

Conclusion

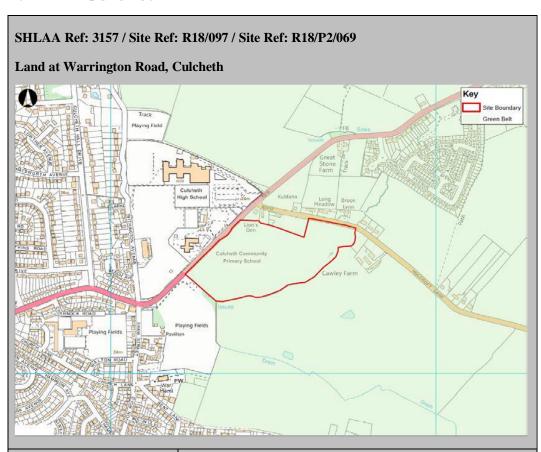
The site was assessed as making a weak contribution to Green Belt purposes. Development of the site would result in some encroachment into the countryside however development would not represent unrestricted sprawl as it would be reasonably contained and well defined along strong permanent boundaries to the south, east and north (Bridgewater Canal, Cliff Lane, All Saints Drive, and the Trans Pennine Trail). Given the pattern of the built-up area, development could constitute 'rounding off' of the settlement pattern. The removal of this site from the Green Belt will not harm the overall function and integrity of the Warrington Green Belt. The new Green Belt boundary would be recognisable and permanent being strongly defined to the south, east and north by the Bridgewater Canal, Cliff Lane, All Saints Drive, and the Trans Pennine Trail respectively.

4.3 Croft



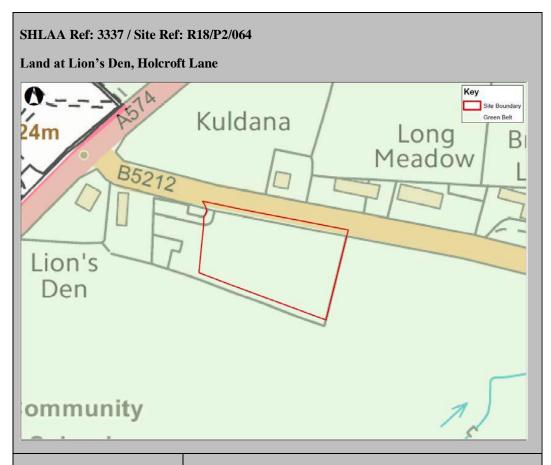
	Purpose 4 – The site is not adjacent to a historic town, nor does it cross the viewpoint of the Parish Church.
Are there any cumulative impacts (due to release of adjacent sites)?	There are no other sites proposed for release around Croft.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary to the south would be defined by a hedge lined footpath which represents a recognisable and permanent boundary. The northern and eastern boundaries currently consist of field boundaries and these would need to be strengthened to create a recognisable and permanent new Green Belt boundary. Policy OS2 recognises this requirement.
Conclusion	The site currently makes a weak contribution to Green Belt purposes. Overall, development of the site would not represent encroachment into the countryside as the majority of the site is currently in use as Heathcroft Stud (equestrian use) therefore the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Croft. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries.

4.4 Culcheth



Key Question to Consider	Assessment
What is the site's existing contribution to Green Belt purposes?	Weak contribution
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	Purpose 1 – Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not connected to the large built-up area of Warrington. Purpose 2 – Development of the site would slightly reduce the gap between the Warrington urban area, Culcheth and Leigh in the neighbouring authority of Wigan. However due to the size of the gap and the existing intervening development this reduction would not be perceptible. It would not result in neighbouring towns merging. Purpose 3 – Development of the site would entail a small incursion into undeveloped countryside although it would join up with existing development in the Green Belt to the north. Purpose 4 – The site is not adjacent to a historic town, nor does it cross the viewpoint of the Parish Church.

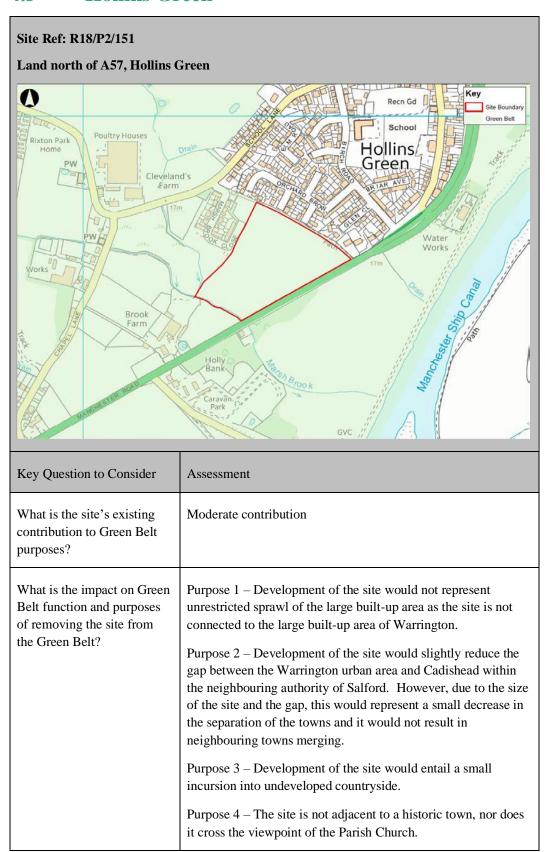
Are there any cumulative impacts (due to release of adjacent sites)?	Release of this site would result in an isolated area of undeveloped Green Belt (SHLAA: 3337 / Site Ref: R18/P2/064). The openness of the adjacent site would be impacted by development of this site therefore it is logical to combine both sites.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary to the north would be defined by Holcroft Lane which represents a recognisable and permanent boundary. The south western and eastern boundaries currently consist of field and hedgerow boundaries and these would need to be strengthened to create a recognisable and permanent new Green Belt boundary. Policy OS3 recognises this requirement.
Conclusion	The site currently makes a weak contribution to Green Belt purposes. Whilst development of the site would entail a small incursion into undeveloped countryside, the removal of the site from the Green Belt alongside the adjacent site (SHLAA Ref: 3337 / Site Ref: R18/P2/064) will not harm the overall function and integrity of the Green Belt around Culcheth. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries.



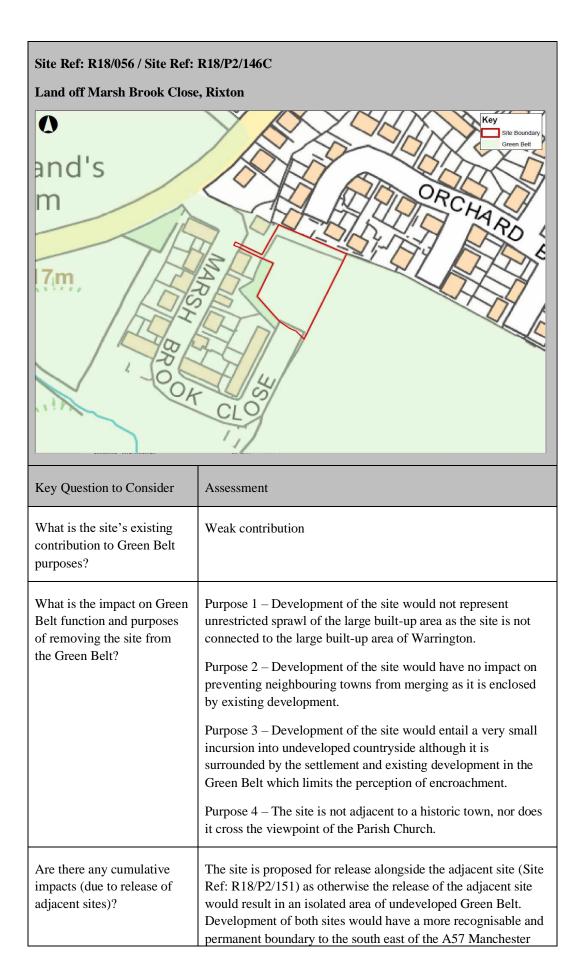
Key Question to Consider	Assessment
What is the site's existing contribution to Green Belt purposes?	Moderate contribution
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	Purpose 1 – Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not connected to the large built-up area of Warrington. Purpose 2 – Development of the site would slightly reduce the gap between the Warrington urban area, Culcheth and Leigh in the neighbouring authority of Wigan. However due to the size of the site and the existing intervening development this reduction would not be perceptible. It would not result in neighbouring towns merging. Purpose 3 – Development of the site would entail a very small incursion into undeveloped countryside although there is existing development in the Green Belt to the north and west which limits the perception of encroachment. Purpose 4 – The site is not adjacent to a historic town, nor does it cross the viewpoint of the Parish Church.

Are there any cumulative impacts (due to release of adjacent sites)?	The site is proposed for release alongside the adjacent site (SHLAA Ref: 3157 / Site Ref: R18/097 / Site Ref: R18/P2/069) as otherwise it would not be adjacent to an existing settlement and the release of the adjacent site would result in an isolated area of undeveloped Green Belt. Development of both sites would result in a small incursion into undeveloped countryside however the release of both sites will not harm the overall function and integrity of the Green Belt around Culcheth.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary to the north would be defined by Holcroft Lane which represents a recognisable and permanent boundary. In combining the site with the adjacent site (SHLAA Ref: 3157 / Site Ref: R18/097 / Site Ref: R18/P2/069), the south western and eastern boundaries would need to be strengthened to create a recognisable and permanent new Green Belt boundary. Policy OS3 recognises this requirement.
Conclusion	The site currently makes a moderate contribution to Green Belt purposes. Whilst development of the site would entail a very small incursion into undeveloped countryside, the removal of the site from the Green Belt alongside the adjacent site (SHLAA Ref: 3157 / Site Ref: R18/097 / Site Ref: R18/P2/069) will not harm the overall function and integrity of the Green Belt around Culcheth. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries.

4.5 Hollins Green

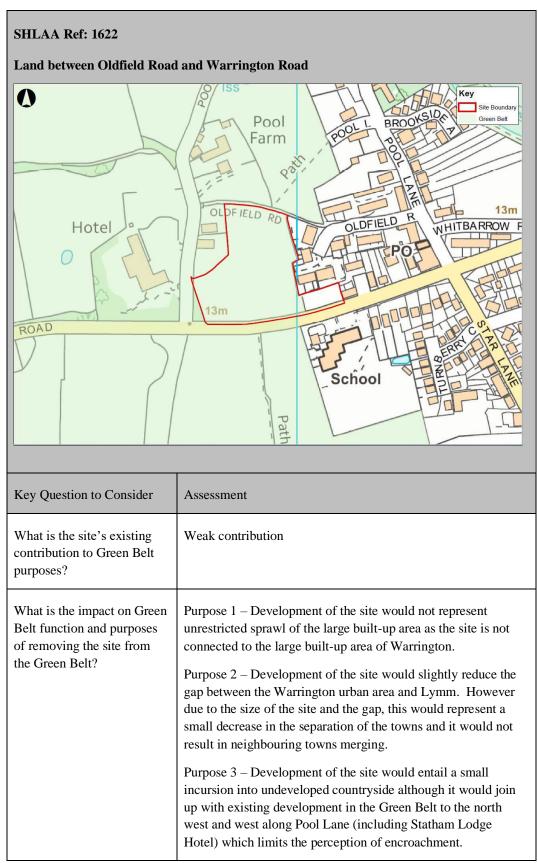


Are there any cumulative impacts (due to release of adjacent sites)?	Release of this site would result in an isolated area of undeveloped Green Belt (Site Ref: R18/056 / Site Ref: R18/P2/146C). The openness of the adjacent site would be impacted by development of this site therefore it is logical to combine both sites.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary to the south east would be defined by A57 Manchester Road which represents a recognisable and permanent boundary. The southern and western boundaries currently consist of Marsh Brook and tree lines and these would need to be strengthened to create a recognisable and permanent new Green Belt boundary. Policy OS4 recognises this requirement.
Conclusion	The site currently makes a moderate contribution to Green Belt purposes. Whilst development of the site would entail a small incursion into undeveloped countryside, the removal of the site from the Green Belt alongside the adjacent site (Site Ref: R18/056 / Site Ref: R18/P2/146C) will not harm the overall function and integrity of the Green Belt around Hollins Green. A new recognisable and permanent Green Belt boundary would be created consisting of the A57 Manchester Road and through strengthening the other existing boundaries.

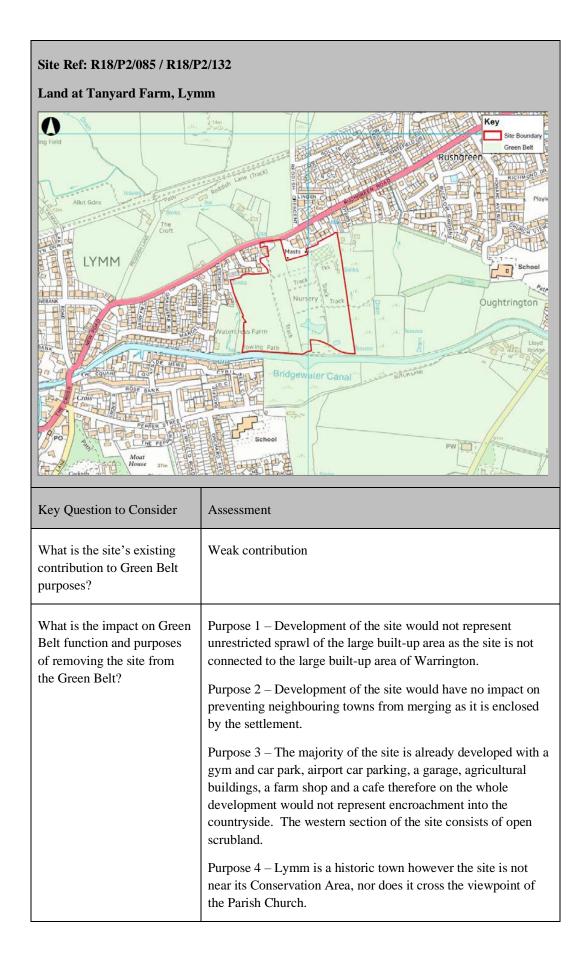


	Road. Development of both sites would result in a small incursion into undeveloped countryside however the release of both sites will not harm the overall function and integrity of the Green Belt around Hollins Green.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	In combining the site with the adjacent site (Site Ref: R18/P2/151), the new Green Belt boundary to the south east would be defined by A57 Manchester Road which represents a recognisable and permanent boundary. The southern and western boundaries would consist of Marsh Brook and tree lines and these would need to be strengthened to create a recognisable and permanent new Green Belt boundary. Policy OS4 recognises this requirement.
Conclusion	The site currently makes a weak contribution to Green Belt purposes. Whilst development of the site would entail a very small incursion into undeveloped countryside, the removal of the site from the Green Belt alongside the adjacent site (Site Ref: R18/P2/151) will not harm the overall function and integrity of the Green Belt around Hollins Green. A new recognisable and permanent Green Belt boundary would be created consisting of the A57 Manchester Road and through strengthening the other existing boundaries.

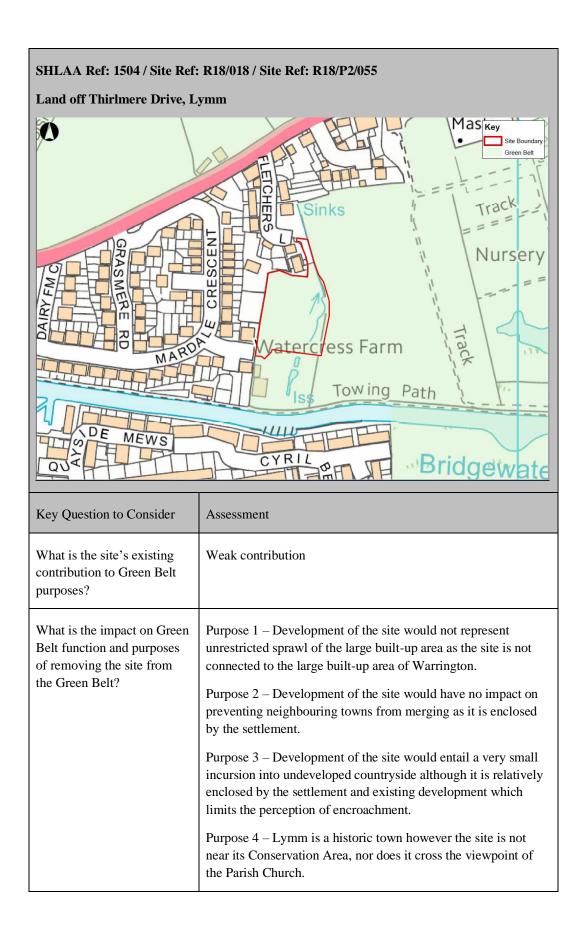
4.6 Lymm



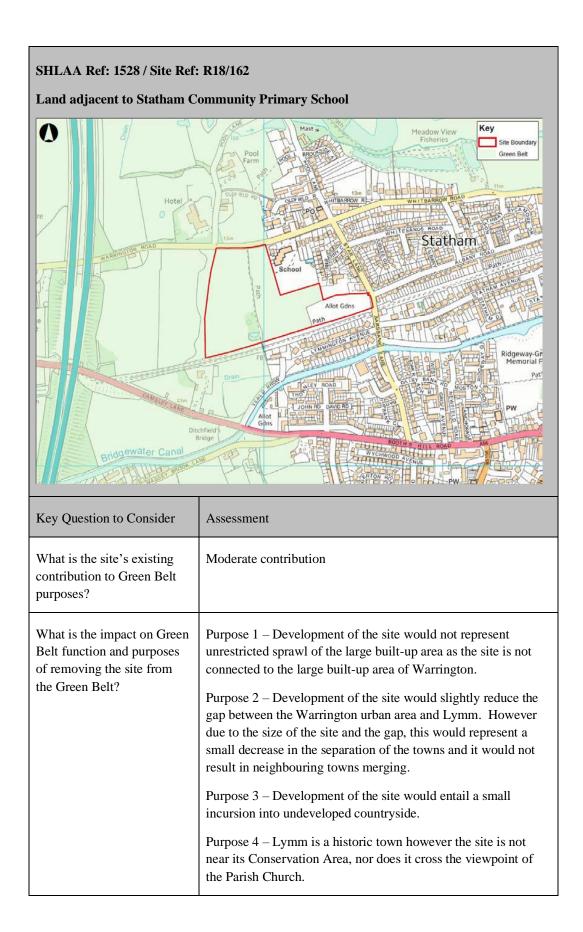
	Purpose 4 – Lymm is a historic town however the site is not near its Conservation Area, nor does it cross the viewpoint of the Parish Church.
Are there any cumulative impacts (due to release of adjacent sites)?	Five sites (comprising four site allocations) are proposed for release around Lymm. Three of these sites are located along the western edge of Lymm. The western edge of Lymm forms part of the gap between the Warrington urban area and Lymm however cumulatively the release of these sites would only slightly reduce the gap between the neighbouring towns and it would not result in them merging. Collectively, the release of these sites would represent an incursion into the Green Belt around Lymm albeit a small incursion given the relative size of Lymm. Overall, it would not harm the function and integrity of the Green Belt around Lymm.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would be defined by Oldfield Road (footpath) to the north, and part of Pool Lane to the west, these represent recognisable and permanent boundaries. The remainder of the western boundary consists of dense tree line and this would need to be strengthened to create a recognisable and permanent new Green Belt boundary. Policy OS6 recognises this requirement.
Conclusion	The site currently makes a weak contribution to Green Belt purposes. Whilst development of the site would entail a small incursion into undeveloped countryside, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Lymm. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries.



Are there any cumulative impacts (due to release of adjacent sites)?	Release of this site would result in an isolated area of undeveloped Green Belt (SHLAA Ref: 1504 / Site Ref: R18/018 / Site Ref: R18/P2/055). The openness of the adjacent site would be impacted by development of this site therefore it is logical to combine both sites. In total five sites (comprising four site allocations) are proposed for release around Lymm. Collectively, the release of these sites would represent an incursion into the Green Belt around Lymm albeit a small incursion given the relative size of Lymm. Overall, it would not harm the function and integrity of the Green Belt around Lymm.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary to the south would be defined by the Bridgewater Canal which represents a recognisable and permanent boundary. The eastern boundary which consists of a field boundary would need to be strengthened to create a recognisable and permanent new Green Belt boundary. Policy OS7 recognises this requirement.
Conclusion	The site currently makes a weak contribution to Green Belt purposes. Overall, development of the site would not represent encroachment into the countryside as the majority of the site is already developed with a gym and car park, airport car parking, a garage, agricultural buildings, a farm shop and a café, therefore the removal of the site from the Green Belt alongside the adjacent site (SHLAA Ref: 1504 / Site Ref: R18/018 / Site Ref: R18/P2/055) will not harm the overall function and integrity of the Green Belt around Lymm. A new recognisable and permanent Green Belt boundary would be created consisting of the Bridgewater Canal and through strengthening the other existing boundaries.

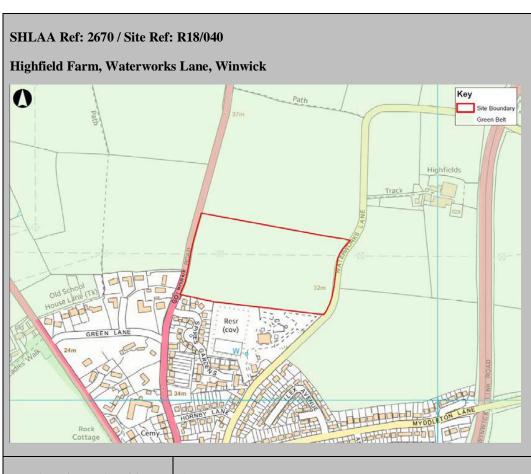


Are there any cumulative impacts (due to release of adjacent sites)?	The site is proposed for release alongside the adjacent site (Site Ref: R18/P2/085 / R18/P2/132) as otherwise the release of the adjacent site would result in an isolated area of undeveloped Green Belt. In total five sites (comprising four site allocations) are proposed for release around Lymm. Collectively, the release of these sites would represent an incursion into the Green Belt around Lymm albeit a small incursion given the relative size of Lymm. Overall, it would not harm the function and integrity of the Green Belt around Lymm.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	In combining the site with the adjacent site (Site Ref: R18/P2/085 / R18/P2/132) the new Green Belt boundary to the south would be defined by the Bridgewater Canal which represents a recognisable and permanent boundary. The eastern boundary which consists of a field boundary would need to be strengthened to create a recognisable and permanent new Green Belt boundary. Policy OS7 recognises this requirement.
Conclusion	The site currently makes a weak contribution to Green Belt purposes. Whilst development of the site would entail a very small incursion into undeveloped countryside, the removal of the site from the Green Belt alongside the adjacent site (Site Ref: R18/P2/085 / R18/P2/132) will not harm the overall function and integrity of the Green Belt around Lymm. A new recognisable and permanent Green Belt boundary would be created consisting of the Bridgewater Canal and through strengthening the other existing boundaries.



Are there any cumulative impacts (due to release of adjacent sites)?	Four other sites are proposed for release around Lymm. Three of these sites are located along the western edge of Lymm. The western edge of Lymm forms part of the gap between the Warrington urban area and Lymm however cumulatively the release of these sites would only slightly reduce the gap between the neighbouring towns and it would not result in them merging. Collectively, the release of these sites would represent an incursion into the Green Belt around Lymm albeit a small incursion given the relative size of Lymm. Overall, it would not harm the function and integrity of the Green Belt around Lymm.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary would be defined by the Trans Pennine Trail to the south which represents a recognisable and permanent boundary. The western boundary consists of dense tree line and this would need to be strengthened to create a recognisable and permanent new Green Belt boundary. Policy OS8 recognises this requirement.
Conclusion	The site currently makes a moderate contribution to Green Belt purposes. Whilst development of the site would entail a small incursion into undeveloped countryside, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Lymm. A new recognisable and permanent Green Belt boundary would be created by strengthening the existing boundaries.

4.7 Winwick



Key Question to Consider	Assessment
What is the site's existing contribution to Green Belt purposes?	Moderate contribution
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	Purpose 1 – Development of the site would not represent unrestricted sprawl of the large built-up area as the site is not connected to the large built-up area of Warrington. Purpose 2 – Development of the site would slightly reduce the gap between the Warrington urban area and Newton-le-Willows. However, due to the size of the site and the gap, this would represent a small decrease in the separation of the towns and it would not result in neighbouring towns merging. Purpose 3 – Development of the site would entail a small incursion into undeveloped countryside. Purpose 4 – The site is not adjacent to a historic town, nor does it cross the viewpoint of the Parish Church.

Are there any cumulative impacts (due to release of adjacent sites)?	There are no other sites proposed for release around Winwick.
Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?	The new Green Belt boundary to the east and west would be defined by Waterworks Lane and Golborne Road respectively which represent recognisable and permanent boundaries. The northern boundary currently consists of a field boundary and this would need to be strengthened to create a recognisable and permanent new Green Belt boundary. Policy OS9 recognises this requirement.
Conclusion	The site currently makes a moderate contribution to Green Belt purposes. Whilst development of the site would entail a small incursion into undeveloped countryside, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Winwick. A new recognisable and permanent Green Belt boundary would be created by strengthening existing boundaries.

Appendix A

Good Practice Review

A1 Good Practice Review

Local	Approach to Implications of Green Belt Release	Arup Comments
Authority Nuneaton and	The Strategic Housing Site Selection Background	The Council
Bedworth Council Local Plan (adopted 11 June 2019)	Paper (2013) included the following overarching criteria: 1. Needs of Nuneaton and Bedworth (does it join the existing urban area) 2. Settlement hierarchy and role (does it join a settlement, settlement role in the hierarchy) 3. Urban focus and urban extensions (could it form an urban extension) 4. Green Belt (contribution to Green Belt purposes) 5. Separation of settlements (does it form a function separating settlements) In the Inspector's Report, the Inspector commented on the Council's approach stating that they were justified in also considering low-medium sites whilst ensuring that the purpose and function of the Green Belt (particularly purpose 1 and 2) would not be unduly compromised. He noted that the performance of a Green Belt site is only one consideration and securing a sustainable pattern of development is also critical. High performing sites were not considered.	considered the contribution to Green Belt purposes as part of site selection as well as specific criteria on the separation between settlements. The Inspector noted that the Council had considered whether the purpose and function of the Green Belt would be unduly compromised.
Stevenage Borough Local Plan (adopted 22 May 2019)	Review of the Green Belt around Stevenage: Part 2 – Site assessment and capacity testing (AMEC, 2015): The Part 2 Study identified parcels of land which could be proposed for removal from the Green Belt for release in the short and longer term. The assessment criteria included the following: • Would development of this parcel affect the openness and purposes of the Green Belt? • Assessment of potential defensible Green Belt boundaries where (following the NPPF para 85) potential development sites/areas have been identified, specifically: • Is this area of Green Belt associated with clearly defined boundary features which are readily recognisable and likely to be permanent? • Are there any issues which may weaken the ability of the Green Belt to endure beyond the plan period? In the Inspector's Report, on a site by site basis the Inspector considered the outcomes from the Council's Green Belt Review and the relative performance of the sites proposed to be allocated noting the impact of the removal of the site on the overall function of the Green Belt. She concludes that in the context of the Council's housing need	The Council's Part 2 Green Belt Study identified potential areas for release based on Green Belt factors, followed by development constraints, and consideration of defensible Green Belt boundaries. The Council had detailed criteria on the implications of Green Belt release. The Inspector considered each site in turn specifically considering the impact of the removal of the site on the overall function of the Green Belt.

taking into account the thorough Green Belt site assessments and the resultant impact on the overall function of the Green Belt, exceptional circumstances exist to release the proposed sites. In the Inspector's Report, the Inspector concluded that strategic-level exceptional circumstances did exist, and then considered the local-level exceptional circumstances on a site by site basis taking into account the findings from the Council's Green Belt and Countryside Study (2014) relating to the sensitivity of the site against the NPPF Green Belt purposes as well as the size of the site and its ability to contribute to the Borough's housing requirement. Kirklees Council Local Plan (adopted Plan (a		T	<u> </u>
Kirklees Council Local Plan (adopted 27 February 2019) The Method notes that Green Belt sites. The Method notes that Green Belt sites which are less than 0.4ha have been assessed as part of the Green Belt boundary changes document. The overall site conclusions for development options in the Green Belt included the configuration and relationship of the site to the settlement it abuts, the degree of infill or rounding off that could be achieved and the ability of the option to present a strong new defensible green belt boundary. Green: The site would present a reasonable extension relative to the settlement it abuts, would have little or no impact on the purposes of including land in the green belt and presents the opportunity to create a strong new defensible green belt boundary. Amber: The site is located adjacent to a part of the green belt edge where assessment has shown that development would have some detrimental impact on the purposes of including land in the green belt and/or the site does not present a strong new defensible green belt boundary. Amber: The site is located adjacent to a part of the green belt edge where assessment has shown that development would have some detrimental impact on the purposes of including land in the green belt and/or the site does not present a strong new defensible green belt boundary. Opportunity may exist that could mitigate this impact, such as the minor alteration to the option boundary or the	Council Local Plan: Strategy and Sites (adopted 25	assessments and the resultant impact on the overall function of the Green Belt, exceptional circumstances exist to release the proposed sites. In the Inspector's Report, the Inspector concluded that strategic-level exceptional circumstances did exist, and then considered the local-level exceptional circumstances on a site by site basis taking into account the findings from the Council's Green Belt and Countryside Study (2014) relating to the sensitivity of the site against the NPPF Green Belt purposes as well as the size of the site and its ability	Belt and Countryside Study identified Potential Development Areas and Potential Major Development Areas taking into account the site's contribution to Green Belt purposes. The resultant impact on
Council Local Plan (adopted 27 February 2019) Allocation Methodology (November 2016) sets the process for allocating urban and Green Belt sites. The Method notes that Green Belt sites which are less than 0.4ha have been assessed as part of the Green Belt Review and can be viewed in the Green Belt Edge Belt boundary changes document. The overall site conclusions for development options in the Green Belt included the configuration and relationship of the site to the settlement it abuts, the degree of infill or rounding off that could be achieved and the ability of the option to present a strong new defensible green belt boundary. Green: The site would present a reasonable extension relative to the settlement it abuts, would have little or no impact on the purposes of including land in the green belt and presents the opportunity to create a strong new defensible green belt boundary. Amber: The site is located adjacent to a part of the green belt edge where assessment has shown that development would have some detrimental impact on the purposes of including land in the green belt and/or the site does not present a strong new defensible green belt boundary. Opportunity may exist that could mitigate this impact, such as the minor alteration to the option boundary or the			not specifically considered.
Red: The site would not present a reasonable extension relative to the settlement it abuts and/or the site is located adjacent to a part of the green belt edge where assessment has shown that development would have a significant detrimental impact on the	Council Local Plan (adopted 27 February	Allocation Methodology (November 2016) sets the process for allocating urban and Green Belt sites. The Method notes that Green Belt sites which are less than 0.4ha have been assessed as part of the Green Belt Review and can be viewed in the Green Belt boundary changes document. The overall site conclusions for development options in the Green Belt included the configuration and relationship of the site to the settlement it abuts, the degree of infill or rounding off that could be achieved and the ability of the option to present a strong new defensible green belt boundary. Green: The site would present a reasonable extension relative to the settlement it abuts, would have little or no impact on the purposes of including land in the green belt and presents the opportunity to create a strong new defensible green belt boundary. Amber: The site is located adjacent to a part of the green belt edge where assessment has shown that development would have some detrimental impact on the purposes of including land in the green belt and/or the site does not present a strong new defensible green belt boundary. Opportunity may exist that could mitigate this impact, such as the minor alteration to the option boundary or the removal of some additional land from the green belt. Red: The site would not present a reasonable extension relative to the settlement it abuts and/or the site is located adjacent to a part of the green belt edge where assessment has shown that development	The Council applied Green Belt considerations based on the Green Belt Assessment and Green Belt Edge Review making a conclusion as to whether release of the site would impact on the Green Belt purposes and the presence of a

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	that is deemed to be significantly constrained and/or	
	the option is remote from any settlement.	
	In the Inspector's Report, the Inspector considered	
	the findings the Council's Green Belt Review and	
	the impact on Green Belt function and whether there	
	was a strong defensible boundary.	
Barnsley	The Green Belt and Safeguarded Land Background	The Council
Council Local	Paper (2016) and the Housing Background Paper	considered the
Plan (adopted 3	(January 2018) describes the process the Council	findings from the
January 2019)	applied in allocating sites.	Green Belt Review.
		The resultant impact
	In the Inspector's Report, the Inspector considers the	on the Green Belt
	allocations on a site by site basis. In considering	was not specifically
	whether exceptional circumstances exist she notes	considered.
	that alternative sites have been assessed and	
	discounted and she considers the findings from the	
	Green Belt Review and the site's fulfilment of Green	
	Belt purposes.	
Cheshire East	The Council produced a Site Selection Report for	The Council
Local Plan	each of the settlements. This applied suitable,	undertook a detailed
Strategy	available and achievable criteria using a	consideration of
(adopted 27	red/amber/green traffic light scoring system and	Green Belt
July 2017)	providing a commentary on the sites.	implications
		including the Green
	The following Green Belt factors were considered:	Belt assessment of
	Potential area for Green Belt release	the area to be
	Green Belt Assessment of the potential area	released, the
	to be released	resultant Green Belt
	Resulting Green Belt boundary	boundary, the impact
	Surrounding Green Belt (impacts of release)	of releasing the site
	on surrounding Green Belt and any	on the surrounding
	cumulative impacts of releasing sites)	Green Belt and any
	Exceptional circumstances	cumulative impacts
	Exceptional encumstances	of releasing multiple
	In the Inspector's Report, the Inspector stated that	sites in the same
	the site selection process had been undertaken in a	area.
	consistent, objective, comprehensive and transparent	
	way, assessing the contribution that each site makes	
	to the purposes of the Green Belt and the	
	implications for the wider Green Belt, and the results have informed the final site-selection process. For	
	each of the towns surrounded by the Green Belt,	
	CEC has assessed whether development needs can	
	be met, firstly by examining the likely contribution	
	from sites within the urban areas and other non-	
	Green Belt land, and then by assessing potential	
	Green Belt sites in a sequential manner, depending	
	on their contribution to Green Belt purposes, ranging	
	from "no contribution" through to a "significant"	
	and "major" contribution. He stated that "having	
	considered all the evidence, I can find no	
	fundamental flaws or errors in the approach or in	
	1 "	
	the final assessments, particularly since it relies on	
	matters of reasoned judgement."	

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