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WARRINGTON
Borough Council

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Warrington Borough Council

Local Plan

Preferred Development Option

Regulation 18 Consultation

Standard Response Form

July 2017



Warrington Local Plan Preferred Development Option 2017

Site specific representations – Land at Rushgreen Road,
Lymm

for [REDACTED]

17-316

Project : 17-316
Site address : Land at Rushgreen
Road, Lymm
Client : [REDACTED]
Date : 29 September 2017
Author : [REDACTED]
Approved by : [REDACTED]

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1. Introduction

- 1.1 We have been instructed by our client, [REDACTED], to submit representations to the Warrington Local Plan Regulation 18 Preferred Development Option Consultation.
- 1.2 These representations comment on the Preferred Development Option for the development in the Outlying Settlements, including Lymm, and promote our client's site, land at Rushgreen Road, Lymm, for development.

2. Response to the Preferred Development Options questions

- 2.1 We respond to the questions contained in the Regulation 18 response form relevant to our client below. We consider that Question 12 *"do you have any comments to make about our Preferred Development Option for Development in the Outlying Settlements?"* is of main relevance to our client.

Do you have any comments to make about our Preferred Development Option for Development in the Outlying Settlements?

- 2.2 It is considered that the authority should have published details for which specific sites are to be removed from the Green Belt and allocated for employment / housing at this stage. It would have provided a more complete picture and would have enabled the council to gather more constructive representations to inform the submission version of the plan, anticipated to be published for consultation in 2018.
- 2.3 From discussions with the authority, the totals for each settlement have been reached following a review of existing local infrastructure capacity. These are set out in the Area Profiles which form part of the evidence base to the consultation document. The anticipated growth figures seem, on the face of it, to be relatively arbitrary and it is clear that further work is required to determine more specific levels of development. The council acknowledges this in paragraph 5.49 of the consultation document, stating that the numbers provided are indicative at this stage.
- 2.4 There is also insufficient analysis within the plan and the evidence base as to the specific development needs within the villages, for example affordable housing need, which is considered to be significant. The Outlying Settlements face some of the most severe

affordability pressures in the Borough, and housing land supply has been severely constrained by the Green Belt over many years. This is particularly true of Lymm.

- 2.5 The anticipated delivery rate for each of the outlying settlements is set out in Table 22 on page 46 of the Preferred Development Option Consultation document. In terms of the settlement of Lymm, it sets out that the "Indicative Green Belt Capacity" for Lymm is 500 dwellings.
- 2.6 We consider that to assist in meeting the overall housing requirement, and also to meet identified needs within settlements themselves, additional housing should be distributed to the Outlying Settlements, including Lymm.
- 2.7 Lymm is currently thriving, and benefits from strong links to the Warrington Urban Area, as well as built up areas outside of the local authority area, such as Altrincham and Knutsford. The local authority should use this plan as an opportunity to provide growth and infrastructure improvements in all areas of the Borough. Increased housing delivery in the Outlying Settlements, including Lymm, would drive the economy and contribute significantly to improved infrastructure, facilities and amenities in the Outlying Settlements. Constraining development in these settlements is a missed opportunity to ensure that a robust supply of housing, not in direct competition with the strategic allocations, is provided. Such an approach would only exacerbate acknowledged existing affordability issues.
- 2.8 Furthermore, ensuring a varied supply of smaller, deliverable sites in and around the Outlying Settlements would provide a much needed boost to delivery in the first five years of the plan, which is expected to be constrained due to policy and infrastructure issues with the large allocations. This would ensure that the supply is robust and flexible in the short and medium term, should unforeseen issues arise with the strategic allocations.

3. Land at Rushgreen Road

- 3.1 Our client has himself previously submitted details of the site to the early rounds of consultation on the Local Plan, promoting the site for development. The site is available now and our client is willing to develop the site in the near future. The site would therefore be deliverable within the early part of the plan period, and we are not aware of any site specific issues that would delay delivery.

- 3.2 We consider that the site is a suitable location for Green Belt release and an allocation for housing to assist in the meeting housing need in Lymm.
- 3.3 We provide details of the site and set out why we consider it to be suitable for development below.

Site description

- 3.4 The site is located to the north east of Lymm and to the north of Rushgreen Road. It is situated in a small gap between the built-up area of Lymm and the built-up area of Rushgreen on the northern side of Rushgreen Road. There is continuous built development on the southern side of Rushgreen Road between Rushgreen and Lymm.
- 3.5 The site comprises a dwelling and associated buildings in its south west corner. There are open fields within the site to the west east and north. The site is bounded by dense vegetation. It is irregular in shape and has an area of approximately 1.1 ha. There is a small row of terraced houses located to the east of the site, fronting Rushgreen Road. These are located outside of the site boundary. A plan showing the location of the site is attached at **EP1**.

Planning considerations

- 3.6 The site is considered suitable for an allocation for housing development and removal from the Green Belt.
- 3.7 The site is not physically constrained by flood risk, ecological or topographical issues. It has access on its frontage to the A6144 Rushgreen Road.
- 3.8 Given its location, housing development on the site would have good access to the services and facilities both in Lymm and Rushgreen. This includes by public transport, as bus services operate along Rushgreen Road in front of the site.
- 3.9 Whilst the site is currently in the Green Belt, the Regulation 18 consultation document acknowledges that Green Belt release is required to meet housing need. We consider that the site is suitable for Green belt release.

3.10 The site was assessed in the July 2017 Additional Green Belt Assessment as site ref: R18/016. This stated that the site forms a "weak contribution" to the Green Belt. We enclose a copy of the assessment of the site at **EP2**, but it can be summarised as follows:

- The site plays no contribution to checking the sprawl of large built-up areas as it is not located adjacent to the main urban area of Warrington;
- The site plays no contribution to preventing neighbouring towns from merging. Whilst not stated in the Green Belt Assessment, the settlements of Lymm and Rushgreen (which are commonly treated as a single settlement in any event) have already been merged as a result of the built development on the southern side of Rushgreen Road opposite the site;
- The site plays a moderate role in safeguarding the countryside from encroachment. The assessment stated that the site is already part developed but development on the site could lead to development encroaching into the wider parcel of land towards the north of Rushgreen Road. It does acknowledge that the site contributes little to openness however, given that views are limited;
- The site plays a weak contribution to preserving the special character and setting of historic towns. The assessment states that whilst Lymm is a historic town, the site is located on the very edge of the Conservation Area buffer and is physically separate from the Conservation Area;
- The site plays a moderate contribution to encouraging the recycling of derelict and other urban land. Whilst the assessment stated that the site plays a moderate contribution, this must be considered in the context that there is a need to release land from the Green Belt in order to meet development needs.

3.11 Given that there is a need for land to be released from the Green Belt to meet development needs, particularly in the Outlying Settlements, and this is acknowledged in the Regulation 18 Consultation Document, we consider that our client's site should be considered for release. Due to the Green Belt Assessment acknowledging that the site provides a weak contribution to the Green Belt, removal of this site from the Green Belt and its allocation for housing would assist in ensuring that more sensitive Green Belt sites (those which have a moderate or strong contribution to the Green Belt) in and around Lymm do not need to be removed from the Green Belt.

3.12 Therefore, in light of the above and the need for additional land to be identified in the Outlying Settlements, including Lymm, we request that our client's site is removed from the Green Belt and allocated for housing in the Local Plan.

3.13 As referred to above, the site is available now and there are no constraints that we are aware of, other than the site's current Green Belt location, which would delay delivery. It would be available in the early plan period, once removed from the Green Belt. Allocation of the site would therefore assist in meeting housing delivery in the early years of the plan period, at a time when the strategic sites are unlikely to be delivering due to their long lead-in periods. Allocating smaller sites, such as our client's site, which do not have such long lead-in periods, would allow earlier delivery of much needed housing.

4. Summary and conclusions

4.1 Our site-specific representations with regard to the land at Rushgreen Road can be summarised as follows:

- The authority should have published details for which specific sites in Outlying Settlements are to be removed from the Green Belt and allocated at this stage;
- The growth figures for the outlying settlements are arbitrary and further work is required to determine more specific levels of development;
- There is insufficient analysis within the Local Plan and evidence base as to the specific development needs within the Outlying Settlements;
- Additional housing needs to be distributed to the Outlying Settlements, including Lymm in order to meet their particularly severe housing issues, including affordability and infrastructure constraints and to ensure deliverability if strategic allocations do not deliver; and
- Our client's site is suitable for development and removal from the Green Belt, given that it has been acknowledged to play a weak contribution to the Green Belt. It would be available and deliverable within the early plan period and would therefore be able to assist in delivering housing during the potentially long lead-in times for the strategic allocations.

EP1



Legend

Projection = OSGB36

xmin = 367300

ymin = 387200

xmax = 369900

ymax = 388400



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EP2



WARRINGTON
Borough Council

Warrington Borough Council Local Plan

Green Belt Assessment

(Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites)

July 2017



1058 No contribution	<p>tribution: The site is not adjacent to the Warrington urban area and therefore does not contribute to checking the unrestricted sprawl of large built-up areas</p>	<p>No contribution: The site does not play a role in preventing towns from merging</p>	<p>from encroachment as, while it has mainly non-durable boundaries, it supports a weak degree of openness</p> <p>Strong contribution: The site is not connected to the settlement. The site is connected to the countryside almost entirely along non-durable boundaries. The boundaries of the main area of the site consist of tree lined field boundaries which are not durable and may not be able to prevent further encroachment beyond the site. The small areas of the site along the Transpermine Trail have more durable boundaries consisting of a major footpath with thick vegetation on either side. The existing land use is relatively open countryside. While the site was formerly in use as a sewage works, there is no visible built form on the site. There are moderate levels of vegetation on the site, mainly consisting of tall trees close to its southern and eastern boundaries. The site is well connected to the countryside on all sides. The site supports a strong degree of openness as it contains no built form, moderate vegetation and supports long line views of the countryside to the north and west. Overall the site makes a strong contribution to safeguarding the countryside from encroachment due to its openness and non-durable boundaries</p>	<p>No Contribution: Lymm is a historic town however the site is not within 250m of its Conservation Area. The site does not cross an important viewpoint of the Parish Church</p>	<p>Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose</p>	<p>The site makes a strong contribution to one purpose, a moderate contribution to one and no contribution to three. In line with the methodology, professional judgement has therefore been applied</p> <p>The site has been judged to make a strong overall contribution. While the site does not contribute to checking unrestricted sprawl, preventing towns from merging or preserving historic towns, its openness, complete connection with the countryside, and non-durable boundaries mean that it makes a strong contribution to safeguarding the countryside from encroachment by keeping land permanently open. The site also makes a moderate contribution to assisting in urban regeneration</p>	<p>Strong contribution</p>
R18/082 No contribution	<p>tribution: The site is not adjacent to the Warrington urban area and therefore does not contribute to checking the unrestricted sprawl of large built-up areas</p>	<p>No contribution: The site does not play a role in preventing towns from merging</p>	<p>Strong contribution: The site is connected to the settlement along its western and southern boundaries. The western boundary consists of hedge lined garden boundaries which may not be durable enough to prevent encroachment into the site. The southern boundary consists of the A6144 Rush Green Road, which is more durable. The site is connected to the countryside along its northern and eastern boundaries. Part of the northern boundary consists of the Transpermine Trail, which is durable, but the majority of the site's northern and eastern boundary consists of non-durable field boundaries. Transpermine Trail is within 100m of the boundary and this would contain any encroachment. The existing land use consists of open countryside. There is no built form and low levels of vegetation, mainly consisting of trees along Reddish Lane within the site. The site is well connected to the open countryside to the north. The site supports a strong degree of openness as it contains no built form, low levels of vegetation and supports long line views of the countryside to the north. Overall the site makes a strong contribution to safeguarding the countryside from encroachment due to its openness and non-durable boundaries to the west and east</p>	<p>Strong contribution: Lymm is a historic town. The site does not cross an important viewpoint of the Parish Church. The majority of the site is located within the 250m buffer area around Lymm Conservation Area. Part of the site's southern boundary lies adjacent to the Conservation Area. Therefore the site makes a strong contribution to preserving the setting and special character of historic towns</p>	<p>Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose</p>	<p>The site makes a strong contribution to two purposes, a moderate contribution to one and no contribution to two. In line with the methodology, the site has been judged to make a strong overall contribution. While the site does not contribute to checking unrestricted sprawl or preventing towns from merging, it makes a strong contribution to preserving the character of the Lymm Conservation Area and safeguarding the countryside from encroachment due to its location, openness and non-durable boundaries. The site also makes a moderate contribution to assisting in urban regeneration</p>	<p>Strong contribution</p>
R18/016 No contribution	<p>tribution: The site is not adjacent to the Warrington urban area and therefore does not contribute to checking the unrestricted sprawl of large built-up areas</p>	<p>No contribution: The site does not play a role in preventing towns from merging</p>	<p>Moderate contribution: The site is connected to the settlement along its southern boundary. This consists of the A6144 Rush Green Road, which forms a durable boundary which may be able to prevent encroachment into the parcel. The site is connected to the countryside on three sides. These boundaries consist of tree and hedge lined field boundaries, which are not durable and may not be able to prevent further encroachment if the site was developed. The existing land use is a mix of open countryside and a converted farm which is a residential property with associated residential gardens</p>	<p>Weak contribution: Lymm is a historic town. The site does not cross an important viewpoint of the Parish Church. The western section of the site is located within the 250m buffer area around Lymm Conservation Area however it is on the edge of the buffer, albeit it is separated by open countryside. Therefore the site makes a weak contribution to preserving the</p>	<p>Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate</p>	<p>The site makes a moderate contribution to two purposes, a weak contribution to one and no contribution to two. In line with the methodology, the site has therefore been judged to make a weak overall contribution. The site makes a moderate contribution to safeguarding the countryside from encroachment and assisting in urban regeneration, however its boundaries with the settlement are generally durable and it makes no contribution to checking unrestricted sprawl and preventing towns from merging. The site also</p>	<p>Weak contribution</p>

			<p>Built form takes up around 12% of the site in its south western corner, and there is moderate vegetation clustered in the south of the site. The site is well connected to the open countryside on three sides, however there is built development which is within the Green Belt to the east of the site. The site supports a moderate degree of openness as it contains less than 20% built form, moderate levels of vegetation and does not support long line views of the countryside. Overall the site makes a moderate contribution to safeguarding the countryside from encroachment due to its moderate openness and mix of durable and non-durable boundaries.</p>	<p>setting and special character of historic towns</p>	<p>contribution to this purpose</p>	<p>makes a weak contribution to preserving the character of the Lymm Conservation Area</p>	
<p>R18/014</p>	<p>No contribution: The site is not adjacent to the Warrington urban area and therefore does not contribute to checking the unrestricted sprawl of large built-up areas</p>	<p>No contribution: The site does not play a role in preventing towns from merging</p>	<p>Strong contribution: The site is connected to the settlement along its eastern and southern boundaries. The southern boundary along the A6144 Rush Green Road is durable. The eastern boundary along Reddish Crescent is currently durable but may not be able to prevent encroachment into the site in the long term. The site is connected to the countryside along its northern and western boundaries. Its northern boundary consists of the Transpenine Trail, which may be durable enough to prevent further encroachment if the site was developed. The site's western boundaries consist of tree and hedge lined field boundaries, which are not durable. The existing land use consists of open countryside. There is a barn structure in the north west of the site used for farming purposes, and there is minimal vegetation. The site is well connected to the countryside on two sides. The site supports a strong degree of openness as it contains no built form, minimal vegetation and supports long line views of the countryside. Overall the site makes a strong contribution to safeguarding the countryside from encroachment due to its openness and lack of durable long term boundaries.</p>	<p>No Contribution: Lymm is a historic town however the site is not within 250m of its Conservation Area. The site does not cross an important viewpoint of the Parish Church</p>	<p>Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose</p>	<p>The site makes a strong contribution to one purpose, a moderate contribution to one and no contribution to three. In line with the methodology, professional judgement has therefore been applied. The site has been judged to make a moderate overall contribution. Whilst the site supports a strong degree of openness and there are non-durable boundaries to the west, the northern boundary of the Transpenine Trail could contain any development which would therefore not threaten the overall openness and permanence of the Green Belt. The site does not contribute to checking unrestricted sprawl, preventing towns from merging or preserving historic towns. The site also makes a moderate contribution to assisting in urban regeneration.</p>	<p>Moderate contribution</p>