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WARRINGTON BOROUGH COUNCIL  
- 9 NOV 2021  
POSTAL COURIER  
SERVICE

## Updated Proposed Submission Version Local Plan

Our draft Local Plan, otherwise known as our Updated Proposed Submission Version Local Plan, will be our guiding framework for future development and infrastructure provision in Warrington.

Our previous draft Local Plan, published in March 2019, received around 3,200 responses to the consultation. We have taken on board many of the views of local people - much of which focused on how brownfield sites should continue to be prioritised ahead of Green Belt. This, along with the profound impact of the COVID-19 pandemic and changing Government housing methodology, has meant that, in preparing our updated draft Local Plan, we are proposing some big changes.

### Useful documents

You can read about these changes in more detail on our website, [warrington.gov.uk](http://warrington.gov.uk) where you can also read guidance to help you make your representation. You can also request a paper copy by emailing [localplan@warrington.gov.uk](mailto:localplan@warrington.gov.uk).

### Data Protection and Confidentiality

We comply with all legislation governing the protection of personal information, including the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). The information you provide through this survey will be kept secure and analysed by Warrington Borough Council.

To find out more please see [Data protection policy](#) | [warrington.gov.uk](http://warrington.gov.uk)  
[Privacy policy](#) | [warrington.gov.uk](http://warrington.gov.uk)

### Other formats

If you have any concerns or questions about the survey, require the questionnaire in another language or format including large print, Braille, audio or British Sign Language or simply require assistance in completing the form please email [equalities@warrington.gov.uk](mailto:equalities@warrington.gov.uk)

## Proposed Submission Version Local Plan Form PART A - About You

### 1. Please complete the following:

|                                     |                  |
|-------------------------------------|------------------|
| Name of person completing the form: | DR CLIVE FREEMAN |
| Email address:                      | [REDACTED]       |

### 2. What type of respondent are you? Please select one option only.

If you are an agent please select the type of client you are representing.

- A local resident who lives in Warrington
- A person who works in Warrington
- Local Borough, Town or Parish Councillor
- Local Business owner/Manager
- A group or organisation



**WARRINGTON**  
Borough Council

- Visitor to Warrington
- A Developer / Landowner
- Other (please specify):

**3. Please provide your contact details:**

|                                   |  |
|-----------------------------------|--|
| Organisation name (if applicable) |  |
| Agent name (if applicable)        |  |
| Address 1                         |  |
| Address 2                         |  |
| Postal Town                       |  |
| Postcode                          |  |
| Telephone number                  |  |

**Proposed Submission Version Local Plan Form PART B Representation Form**

1. To which part of the Local Plan does this representation relate? Please write in the space below.

*Implications of Green Belt Release August 21*  
*Policy OS2 CRoFT now OS1 in updated PSVLP Page*  
*green Belt assessed by ARUP For R18/P2/002 and R18/095*  
 2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

- A paragraph number (s)
- A policy sub-number (s)
- Both of the above
- None of the above

*SHLAA 3155 Ref R18/095 Heather Park Stud*  
*032 → Page 2266 - 231*

If a paragraph or policy sub-number then please use the box below to list. (For example - Policy MD2.1 part 3 or paragraph 10.2.13 etc as applicable).

**3. Do you consider the Draft Local Plan is:** Please select one option in each row.

|                                       | Yes                      | No                                  |
|---------------------------------------|--------------------------|-------------------------------------|
| Legally Compliant                     | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Sound                                 | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Compliant with the Duty to Co-operate | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

4. If you have answered 'No' to any of the options in the above question then please give details in the box on the next page of why you consider the Draft Local Plan is not legally compliant or





is unsound or fails to comply with the duty to co-operate.

Please be as precise as possible.

I have no confidence at all in the Green Belt assessment by the contracted firm. ARUP - Site 02 on 095 has Hard Borders on 3 Sides. 095 has wide open border on 3 Sides with Acres of open farmland. and also R18/095

R18/P2/002

5. If you answered 'Yes' to any of the options in question 3 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate.

Please be as precise as possible.

[Empty box for response to question 5]

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.

I had put forward my site in 052 29/8/2017 but it was not put on the site map 052 until 2019 after it was rejected. My site is cross road smaller and has hard Road Border on 3 Sides. No protection on east side. ROAD (covered path) is

R18/P2/002

R18 P002

Please note: your representation should succinctly cover all the information, evidence and supporting information necessary to support / justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he / she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

- No, I do not wish to participate at the oral examination
Yes, I wish to participate at the oral examination

(If yes, I understand details from Part A will be used for contact purposes)



P2

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: R18 R002

My Site 02 only has access from Sandy Lane and will require a new access of Head Lane. It is impossible to access except by a drive without being taken to the Field due to the neglect to overgrown vegetation etc. and small access at present. The new development will block (095) views of Parish Church from Mustard Lane Craft - Inspector needs to see this.

8. If you wish to include documents to support your representation form then please attach to your submission and use the space below to provide a brief description.

I intend to resubmit most of my evidence sent in June 2019 to support my case in the ~~sublot~~ updated proposals. There was NO individual response it was covered only by stating consultation were sent by several landowners.

**Proposed Submission Version Local Plan Form PART C - About You**

4/4/21

We are committed to ensuring our services are provided fairly and are accessible to those who need them. To help us meet this commitment, we ask all customers to complete an equality and diversity monitoring form.

The reason why we ask you these questions is so we can:

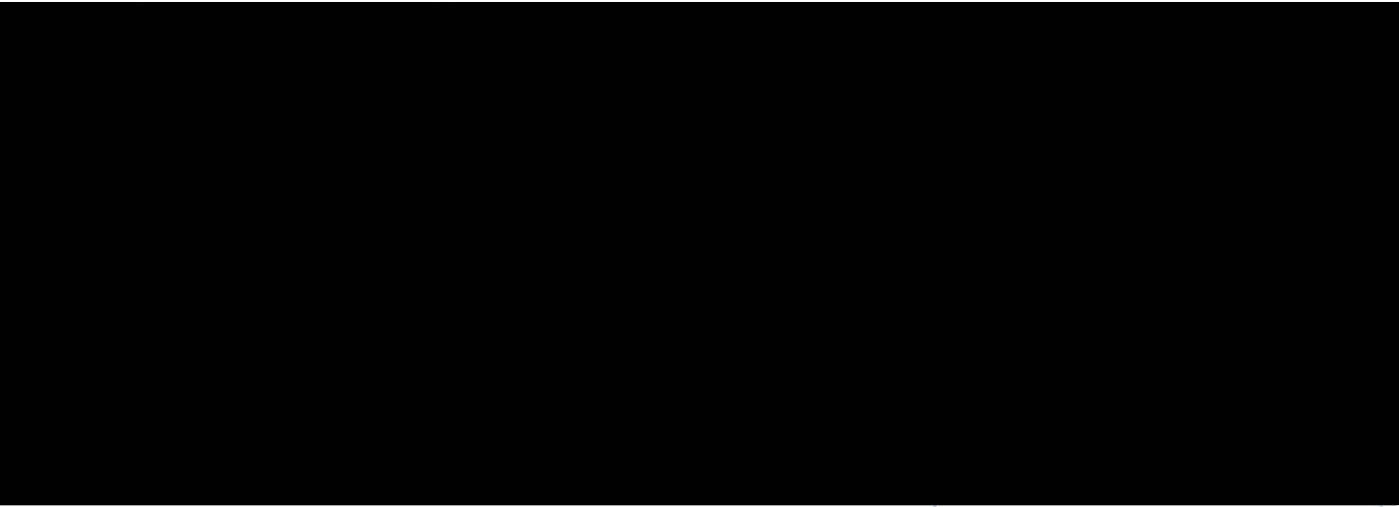
- Make our council services open to everyone in Warrington
- Treat everyone fairly and appropriately when they use our services
- In consultations, make sure that we have views from all across Warrington
- The Equality Act 2010 makes these aims part of our legal duties. Your answers help us check that we have met the law and help improve our services.

**Data Protection and Confidentiality**

We comply with all legislation governing the protection of personal information, including the Data Protection Act 2018 and the General Data Protection Regulation (GDPR)

These monitoring questions are optional. You do not need to answer any of the following questions if you do not wish to, and you will not be affected in any way if you choose not to answer any, or some, of the questions. Questions have 'prefer not to say' as a response option.

**Please only complete this section if you are responding as an individual.**







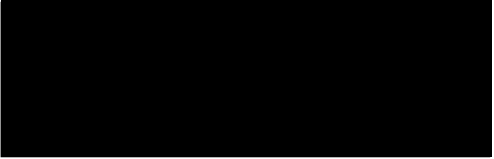












4/11/2021

Dear sir or Madam.

Land east of Heath land and north of sandy lane Croft  
OS2 response 117640947 submitted 25/05/2019 R18/P2/002  
Also relating to Heath croft the selected site for OS2 R18/095.

I enclose this letter with my new consultation which is basically the same

I had no personal written or email response whatsoever from WBC and it was only covered briefly in their updated PSVLP 2021 by saying some landowners had proposed their sites as being more suitable. with no more information

Although my site only had one code number 002 and not 3 like Heath croft it was not put on the local site map with applicants until after rejection.

I complained strongly that I had no confidence in the green belt assessments by ARUP in relation particularly to my site R18/P2/002 and Heath Croft R18/095( and it's several other code numbers.)

Bellway produced their glossy brochure after they had their green belt assessment.

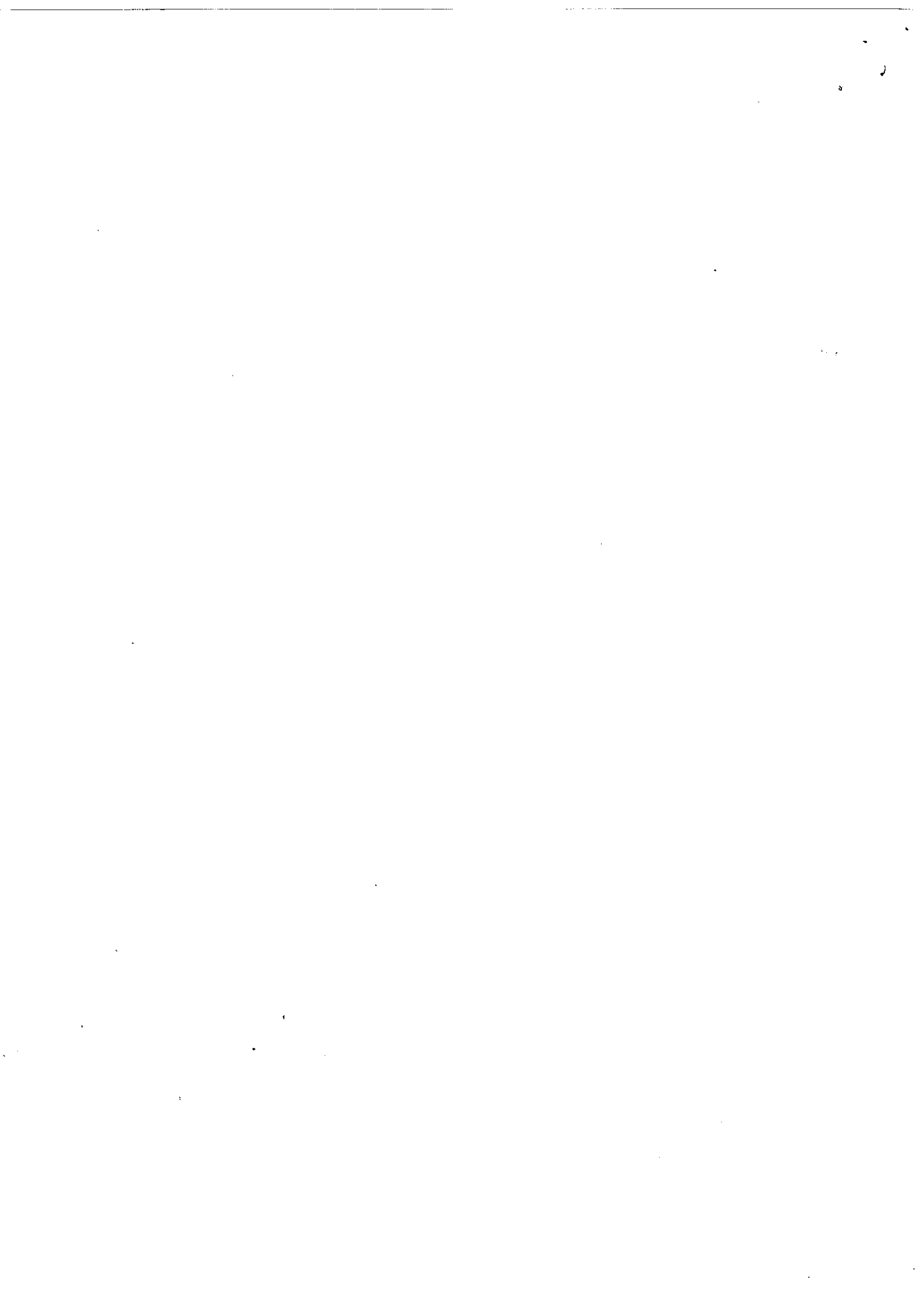
I have made strong criticisms of both the green belt assessments and the Bellway and How document implying that the equestrian centre is brown land as well as their failure to understand how open their site is having open borders with masses of Hectares of land to the north, east and south with weak borders on 3 sides and a clear beautiful view of Croft parish church from Mustard lane over the primary school grounds to be obliterated which is the only Croft 4 (or d) issue considered on green belt assessment questions. So to me my site has no D issues while Heath croft blocks the church view to all children Staff and parents and walkers on Mustard lane.

My site has been derelict mainly for over 30 years with no agricultural use for over 70 years as my parents moved to the house when I was born in 1951 It is totally isolated from public view and is not wide open at all. It has strong boundaries on 3 sides called weak by ARUP and no ability to see it without contacting myself or my family unless they walked onto the site unaccompanied so I feel it was only assessed by google earth unless ARUP has drones

I thus have no confidence in the assessments by ARUP nor the failure of the LDP team to explain fully that the green belt assessment was the main reason for refusal.

I understand that my site may not be perfect and would only take about 30 houses needing another site despite the green belt reduction but I do not feel the Heath croft proposal is in any way "a golden thread" of planning by dismantling a highly successful equestrian business which had been given planning permission many years ago on the basis of being totally suitable to a rural community and not a reason some years later to apply for building use or it will be a precedent for all other equestrian businesses to turn equestrian buildings into housing ( eg burley Heyes stables Arley Rd Appieton Thorn.recent application to WBC 2021)

I thus would like the inspector to look into my concerns in relation especially to the green belt assessments. Also strategic planning advisors only look to the future and not the past. Development has been creeping up Mustard lane and Lord St in Croft northward and easterly for over 60 years It started initially with the new school east of Mustard lane in the 60's I went to the old school in the 50s. Then croft heath was developed behind the old school losing a lovely triangle near the village hall. Then first the petrol station off Lord st (east) was developed belonging to a previous Warrington





Mayor (Mr Philip Birchall). Then Heath farm (Mr Lear) was developed in the 80's near the current site on Mustard lane with Deacon close and Abbey close. The Lear farm fields were then owned by the Marshes who are still the current owners and applicant.

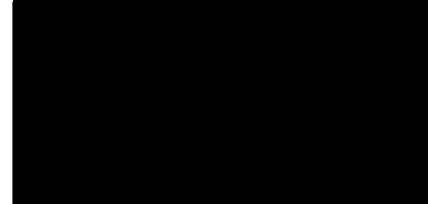
This is not remembered by planners and I have the 1984 inset village map that shows none of these areas except the new school developed. So all this planning concentration about preventing encroachment is nonsense as there has been creeping encroachment up Lord st and Mustard lane for the last 50 years. Our site is directly due north of the old inset village border north of Sandy lane and east of Heath lane not a continuous area of encroachment of previous green belt extensions in past strategic plans, as this one certainly is.

I do not apologise for enclosing my 2019 submission as I do not think they were assessed properly. Since my last representation in 2019 and the updated PSVLP, I do not see how the green belt reduction is computed with 580 houses reduced or is this in the garden suburb etc and not in the villages. If there is to be a reduction in the villages then smaller more appropriate sites impacting less on the green belt would be far better than using a business that is as close to green belt as possible. Or if you are going to use the land the equestrian centre building by itself and not the surrounding fields without causing further creeping encroachment up Mustard lane and to the east and south, using all the fields which currently are very rural with thoroughbred horses grazing. This building might be used for 15 houses. Our small site is enclosed by 3 roads and is not encroachment. Are we going to see numerous equestrian planning applications in Newmarket and all other areas of the country following this.? There are several other equestrian centres in Croft who may think this would be appropriate.

I enclose most of my representations from 2019 as I am not confident that you will still have this after WBC data loss issues with the planning department with older records

Dr Clive Freeman

Warrington resident for Life and Croft resident for 30 years





OLD mapbook from 1980's

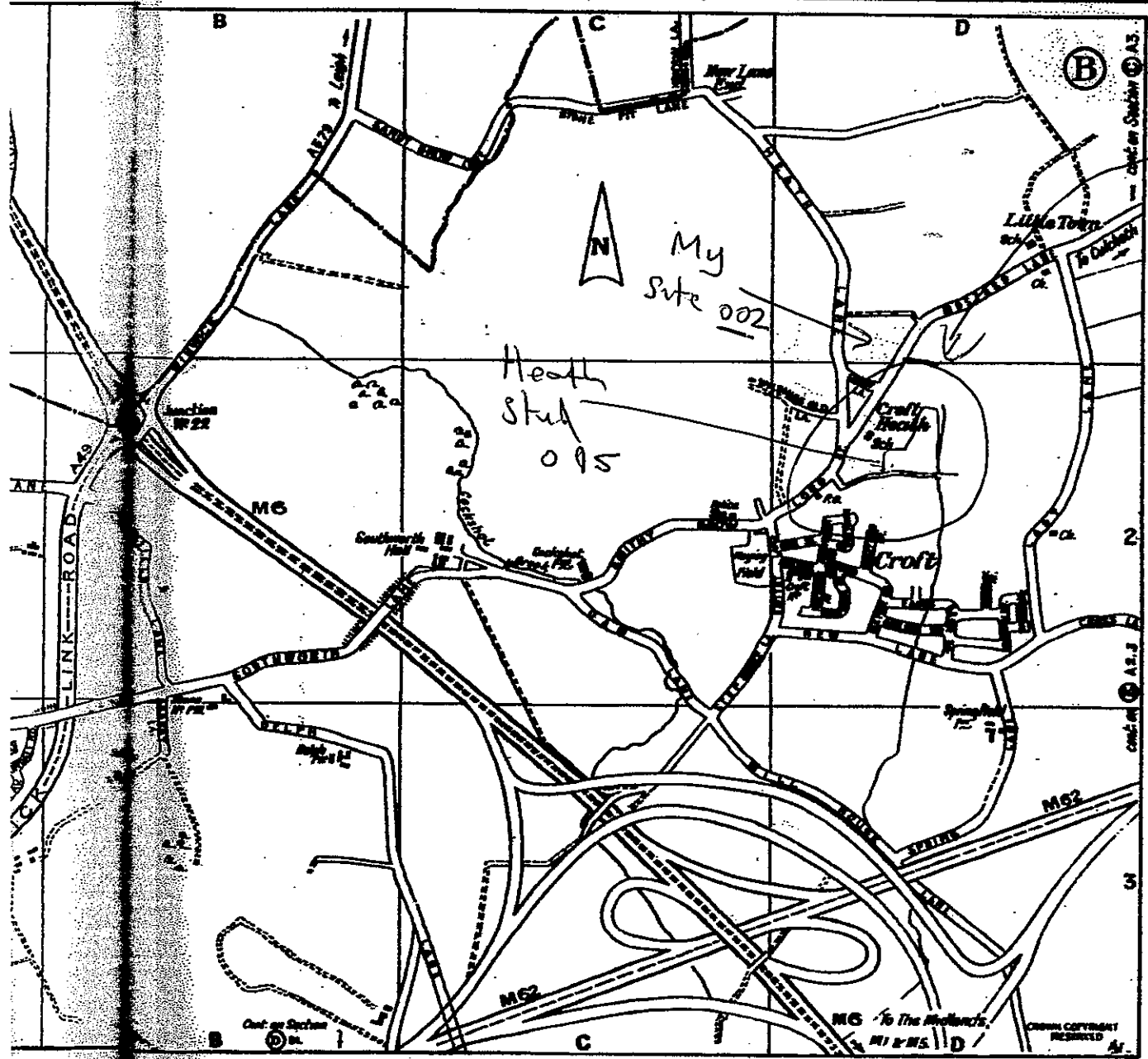
NO Development close to the New School off Mustard Lane

Since the ~~Shanty~~ <sup>cross</sup> ~~road~~ <sup>encroachment</sup> since then



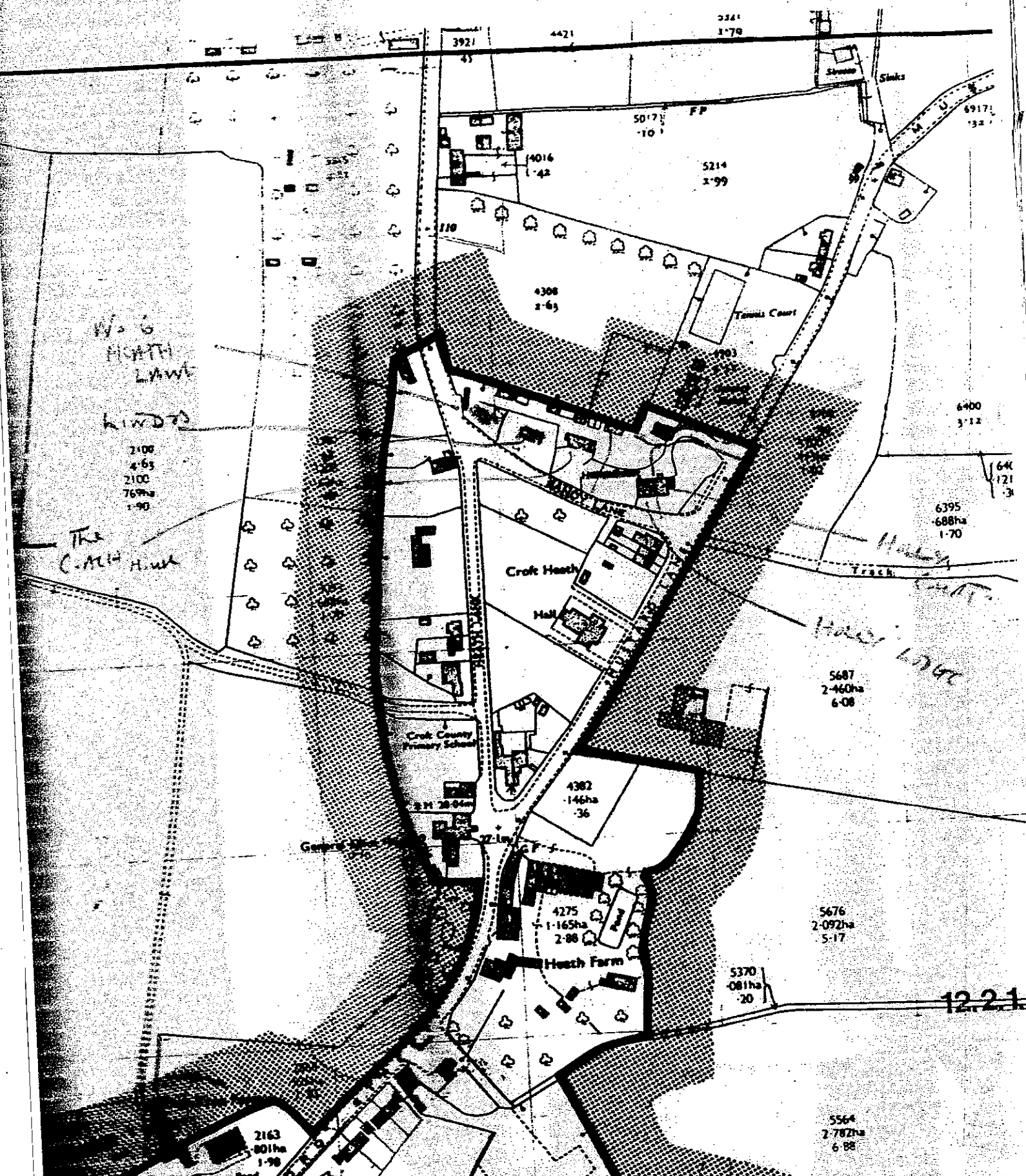
<sup>Over 40 years</sup>  
**E. Burrill & Son Ltd.**  
Directors: E. BURRILL, G.F. BURRILL

Building and Civil Engineering Contractors  
64 OUGHTINGTON LANE, LYMM, CHESHIRE - WA13 02T  
Telephone: Lymm 3545 and 2607










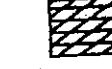






*39 Oaks in  
Tingford*  
*Swing Sun Sun leading steps  
13 Arundell Road Bicknell*  
*823405*



# OUTER WARRINGTON LOCAL PLAN PROPOSALS MAP

## INSET MAP No. 5 : CROFT

-  OUTER WARRINGTON LOCAL PLAN BOUNDARY
-  WARRINGTON BOROUGH COUNCIL BOUNDARY (Where not co-incidental with OWLP Boundary)
-  NEW TOWN DESIGNATED AREA BOUNDARY
-  BOUNDARY OF VILLAGE INSET
-  BOUNDARY OF GREEN BELT \_\_\_\_\_ POLICIES 12 2.1 and 12 2.13
-  AREA WITH POTENTIAL FOR INFORMAL RECREATIONAL DEVELOPMENT \_\_\_\_\_ 7 2.1
-  AREA OF HIGH LANDSCAPE VALUE \_\_\_\_\_ 6 2.1
-  SITE OF SIGNIFICANT ECOLOGICAL VALUE \_\_\_\_\_ 8 2.1
-  LAND WITH PRIORITY FOR DERELICT LAND RECLAMATION \_\_\_\_\_ 9 2.1
-  AREA WITHIN WHICH GENERAL POLICIES RELATING TO VILLAGE INSETS APPLY \_\_\_\_\_ 13 2.1 13 2.4 and 13 2.5
-  AREA WITHIN VILLAGE INSET ALLOCATED SPECIFICALLY FOR HOUSING DEVELOPMENT \_\_\_\_\_ 13 2.2
-  AREA WITHIN VILLAGE INSET ALLOCATED FOR EITHER HOUSING OR LIGHT INDUSTRIAL/COMMERCIAL USE \_\_\_\_\_ 13 2.3

WARRINGTON BOROUGH COUNCIL  
PLANNING & ESTATES DEPARTMENT



SCALE 1:2500

Feb 1984

Feb 8 1984

DMR



13/6/2019

**Re Warrington Proposed submission version Local plan. Response 117640947  
email response submitted 25/05/2019. This document is a more comprehensive correspondence.  
Dr Clive A M Freeman**

My representation relates to the green belt selection assessments for the village of Croft (classified as OS2) as well as poor administration by the strategic planning department from Summer 2017 when my application to be considered was taken to the department on 29/08/2017. I heard nothing initially but phoned up and was sent an Email confirming receipt. of the site application. on 26/09/2017.

My application was in the 2<sup>nd</sup> batch as before applications had to be in by 5/12/16 until there were several delays to the LDP process. I believe for the second phase these then needed to be in for a September date. in 2017

I was strongly reassured in two areas on at least 2 occasions on phoning the strategic planning department. One was that my application would soon go on the website and on the site map for Croft so I could see it was being considered with the others equally. The other area I was very concerned about was the question of whether I should seek representation as fairly soon I saw the site maps and the other representations. but not mine. Many of these had glossy presentations from agents and planning advisors (eg A presentation for a massive area west of Croft village by Peel holdings.)

I was reassured that my family's application for: "the area north of Sandy Lane and bordered by Heath lane to the west and to existing housing off Mustard lane on the east." would be considered fairly unrepresented. but now I have severe doubts.

In mid April 2019 I phoned the department to query why my application was still not on the site map for Croft which was coloured pink. I think this was on the 16<sup>th</sup> or 17<sup>th</sup> of April 2019 and I spoke to David Acton. one of the senior planning officers. He informed me that my site number was R18/P2/002 and was now on the site map which it had not been the previous day. (This map was now blue) This was the first time I had been given a number. 20 months after my application and only after my application had been rejected.

He emailed me on 17/04/2019 at 1700 hr confirming to me that the selection process had occurred and that we had been sieved out at the first stage. I was rather shocked by this as I had applied in 2002 in the previous UDP call for sites process and attended an appeal hearing at Warrington town hall. At that time no green belt sites were needed and the two large sites proposed by the council on Lady lane and the Battle field site were not needed as no green belt allocation was needed for the 15 year plan (UDP) in the Croft area. up to 2018. .

I was told my site was too green belt and was likely to be encroached by further development and that it was very strong in the 5 areas of green belt assessment despite the fact that the only difference with my site and the Heath croft Stud was in interpretation in the, **To assist in safeguarding the countryside from encroachment section 3**

I have studied both my green belt assessment and the green belt assessment for Heathcroft stud which has 3 numbers 3155, R18/095 and R18/P2/056. I can only assume Heathcroft stud and their representatives for Bellway homes (How planning consultants) had been in constant communication

with the department to be allocated 3 site numbers. while I had none.

On looking at the website all I could find up to mid April 2019 were the old Croft map and the first phase of applications.

The officers have all been very friendly and understanding at the three consultation meetings I have attended and several telephone conversations but the website is very poor and I was only able to access important documents after being sent links in emails and this is how I found out about the outsourced Green belt assessments. The documents have no page numbers and are 100's of pages long and it took me hours to find the complex assessment for Heathcroft stud with no chance of printing it without using numerous cartridges and trees of paper...The eight columns of the green belt assessments document would not print without missing out 3 columns (whether portrait or landscape)

Also in the on line consultation document there is a severe error which somehow was still left on form Local plan 4. It asks if you answered Yes to any part of question 6 to explain why. There is no question 6 they appear to have meant Question 3.

Warrington Borough has had a lot of criticism recently in the local paper(Guardian) in relation to the planning department. The senior planning officer resigned this year(planning control) and there has been high staff turnover and there has been criticism over high levels of outsourcing work. Some years ago the planning department destroyed or lost all records before the early 1990's meaning if asked questions before that time about a breach of condition for instance they will just state that it is permitted development as they have no records., I do not know whether it is normal policy in long term strategic planning to outsource the greenbelt assessments but when this happens all the local knowledge of the area of the local strategic planning team is not used.

Later on I discuss the Inset village map of Croft from 1984 showing Heath farm included in the inset village area probably being added at that stage( site of Deacon close). This is a document that the strategic planning department probably do not have. This is why I do not have confidence in the Green belt assessments outsourced to a Manchester company as they have no local knowledge of the area. at all

Looking at the green belt assessments of my site (002) and HeathCroft stud (095)and reading the Heathcroft Stud presentation by How planning on behalf of Bellway on about page 24 under heading planning policy and guidance (3.0)it states that Croft Heath stud had been assessed as making a weak contribution to the green belt. on an assessment performed on behalf of WBC by an outsourced Manchester planning company.(ARUP)

This means that the process to me is not fit for purpose or transparent when a large national building company(Bellway) has had a green belt assessment result given to them before my application had even been submitted.

The large 43page presentation by How planning and Bellway was sent to the planning authority on the 29<sup>th</sup> September 2017. I was informed on the 17<sup>th</sup> April 2019 about our application and it's failure at the same time. My green belt assessment appears to have been done almost 20 months later and I suspect it never stood a chance. On the 19<sup>th</sup> of April 2019 I was away for 4 weeks in Spain and on my return have had only 4 weeks to research everything and make my response.

I have no confidence in the greenbelt assessments by the outsourced company and will later give my reasons for this. I have had no time to consider employing a planning advisor to compete with a large building company with their planning advisors.

I have a strong knowledge of the Croft area and when one of the officers emailed about my application for Culcheth on 17/4/19 it did not bode well. It may be a simple mistake by the officer but when he is emailing me about my site rejection it would be helpful if he knew which village I had made my application for. as Culcheth is over 2 miles away.

I lived in Croft from 1951-1981 just south of the application site by 150 metres when I moved to

Appleton for my job as a GP. My brother and sister both co-applicants live very close to the site. I am aware of most developments in the Croft area over the last 68 years.

**Having summarised my situation I would now like to expand my arguments under several key areas**

**1) A description and history of Land north of Sandy Lane and East of Heath lane with photographic evidence ( R18P2002)**

**2) A discussion about the greenbelt assessment of R18P2002 and R18/095 how I totally disagree with them**

**3) A description and history of the Heathcroft stud site and the surrounding area with photographic evidence..Including the 1984 inset village of Croft showing progressive development north and East of Heath farm since that time. Heath farm is now the area above Abbey close and all of Deacon close east of Mustard lane**

**A discussion about the greenbelt assessment of Heathcroft stud and some areas of the Bellway/How presentation document (R18/095) submitted on 29/09/2017 to WBC.**

**Discussion about the old and 2018/2019 NPPF guidance about brownfield sites in greenbelt and the definition of brownfield sites.**

**4) Summary and conclusions from all the above**

**my presentation is in 2 files number one(the blue file contains this introduction and section 2.The yellow file two contains section 3.both files contain photographs and supporting documents.**

# Submitted 13/6/19

**PART A - About You**

1. Please complete the following: Please note the email address (if provided below) will be sent a full copy of the submitted response and a unique ID number for future reference (pdf attachment).

Name of person completing the form: dave freeman

Email address: [REDACTED]

2. What type of respondent are you? Please select all that apply.

A local resident who lives in Warrington

3. Please complete the following:

|                                   | Contact details |
|-----------------------------------|-----------------|
| Organisation name (if applicable) | -               |
| Agent name (if applicable)        | [REDACTED]      |
| Address 1                         | [REDACTED]      |
| Address 2                         | [REDACTED]      |
| Postcode                          | [REDACTED]      |
| Telephone number                  | [REDACTED]      |

**PART B - Representation Form 1**

1. To which part of the Local Plan does this representation relate? From the drop down list please select one option.

Policy OS2 Croft

2. Does your comment relate to a specific paragraph (s) or policy sub-number (s)? Please select one option.

If a paragraph or policy sub-number then please use the box below to list:

the whole allocation process of the site for Croft housing close to Croft primary school accessed via Deacon's close for 75 dwellings. ie whole of OS2. We had a competitive site north of Sandy Lane and east of Heath lane Croft

4. If you have answered 'No' to any of the options in the above question then please give details in the box below of why you consider the Draft Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

I do not feel happy as another competitor with the allocation process which was outsourced by WBC to an external source who probably had little knowledge of the Warrington area. (especially Croft.) My application was received on the 29th August 2017 in the 2nd phase of requests for sites and I was assured on several occasions that my application would soon be put on the website. Mr Usher emailed me to confirm my application on 26/9/17. There were numerous delays in the LDP process but in April 19 I phoned the planning policy department and spoke to an officer. He gave me my allocated number and was able to inform me that our site was not successful as it was too strongly green belt with it's 5 considerations. So my site was put on the computer only after it had been rejected, and only appeared on the 16th or 12th April 2019

I was reassured that there would be no prejudice in not having a planning adviser and agent and noted an application for a huge area by Peel Holdings that contained a glossy document but would have fitted probably over 1000 houses. I now feel it is likely only those with a complex planning proposal were considered before others as I do not feel a para-agricultural businesses such as an equine centre should lead to building applications, being granted as their business is regarded by many as extremely green belt.

I totally disagree that our site is extremely strong in green belt terms. One of the officers stated the green belt assessment would have involved viewing the site but I would state that the only current access is via the north of Sandy Lane, from which the site is not visible.

The hedge to the west is too high and thick to view the site. Most other sites are clearly visible from the road as agricultural land has low hedges and very few trees and large accesses for agricultural vehicles. I feel that unable to access the site the assessment team simply used google earth to view the site and did not contact me to arrange viewing. Looking on google earth it would give the impression of being very green but most of this is self seeded scrub land. If the site had been chosen road access would be by Heath Lane.

Our application number was only allocated and given to me last month is R18/P2/002 after the decision was made. The site has a significant amount of trees and bushes. To the south east of the site is a lawn area which became a grass tennis court in the early 1950s and has no green belt characteristics, to the north of that garden area are about 6 massive dangerous Manchester poplars of which one lost a huge branch about 3 years ago, and they need to be taken down. A large area of brush and bushes with some fruit trees have self seeded over the years in the south and middle part of the site but are in no way scenic. There is a large mound from the building of a bungalow on Sandy Lane in the 1980s, and this has remained since then.

The land has not been used for any agriculture for at least 70 years and probably long before that. There was a stable for horses only used until the early 60's. The only problem is to the north of the site there is an avenue of mature trees which were planted probably in the 1950s but some of these could be kept. The site has been neglected by us for many years due to it's size and I think most of the site is a mess and does not support the 5 principles of green belt in any way.

I respect the site is small and would only support about 30-35 houses but your contracted assessors seem to have chosen just one site in all the other Warrington areas. I believe this is too simplistic for the next 20 years.

Our site would not be as visually intrusive whereas the other site chosen will be a huge loss to the green belt as at present open fields are visible with views of the parish church in the distance on Lady Lane. School children at Croft primary will lose these views and only see a housing estate behind. The chosen site will cause heavy traffic in the village centre south of the school whereas our site traffic would access via Heath Lane with a low hedge, for visibility.

Croft Primary school was built on green belt land in the 60's with the old school triangle being built on south of the Memorial Hall. The new school was built with lovely views behind it and these will be lost. Our site was only one house in the 1950s but since then due to infill there now no fewer than 8 houses all on either Mustard Lane or Sandy Lane. It is also the exact northern boundary of the inset village of Croft.

I have lived on the site from Birth (1951) until 1976 and my brother and Sister still live on [redacted] and [redacted] [redacted] to the site.

I feel our site would have far less impact on the green belt principles than the larger equine site proposal or perhaps there could be two sites with no build behind the school on the other site.



5. If you answered 'Yes' to any of the options in question 6 then please give details in the box below the reasons why you support the legal compliance or soundness of the Draft Local Plan or its compliance with the duty to co-operate. Please be as precise as possible.

I do not understand the question...I feel local experienced people should do the green belt assessments with good local knowledge rather than outsourced experts probably from cities. I have known the northern inset boundaries of Croft for many years and I feel this border has not been considered in relation to how close our site is to it.. nor the loss of amenity and green belt beauty seen from behind the school for the children, parents and staff with the selected application. I do not feel our site was visited and I suspect google earth was. Warrington borough council development control has had a lot of criticism in the local paper about outsourcing and I feel there is an issue here as I do not see our site as extremely green belt at all. Obviously everyone wants to support best practice, transparency, compliance, reflection etc in all fields and professions

6. Please set out what modification(s) you consider necessary to make the Draft Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To show me evidence that the site was physically viewed from inside the area as it is not visible externally due to the high hedge on Heath Lane Croft. and no visibility from Sandy Lane. Neither my assessment on green belt scoring is due to the amount of self seeded vegetation and bushes due to our failure to maintain the field. This looks to be very green on google earth but is in fact land that we have just neglected it and not mowed or pruned. Basically I am not confident it was assessed fairly and it was excluded on the first reduction. I am also not happy that my 2017 application was not on computer until after it was rejected.. How many sites chosen were on the first draft on computer.. If the council did not put the later applications on the public website how did the assessment team access the applications. I want to support my appeal with photographs but am unable to unless I put these on my application now. Apparently I cannot send these in later by hand yet WBC has not updated its website with new applications but expects those wishing to consult to be computer compliant

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Please select one option.

Yes, I wish to participate at the oral examination (I understand details from Part A will be used for contact purposes)

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I feel I can put across my arguments better at a hearing and I would like to support it with photographic evidence which I cannot do with this on line form as I haven't got the computer skills to do so. The main point is that I do not agree that our site is strongly green belt. The wild nature of some of the site has been due to total lack of agricultural use and lack of time to maintain the rampant growth of bushes and vegetation. It is far less agricultural than the majority of other applications.

8. If you wish to upload documents to support your representation form then please select 'choose file' below. You can upload a max number of 2 files (up to 25MB each). If you are submitting more than one representation form please note: If this file upload supports more than one representation form then please do not attempt to upload the same file on subsequent forms. On additional representation forms please use the comments/file description box to type in the 'name of the file', or 'see previous form'. If the file upload is a different document for additional representation forms then please continue to upload the file as normal.

Comments/file description

Representation re Site R18/P2/002 representation number 117640947 .Dr Clive Freeman  
addendum re Green belt assessment methodology

Further to my representation I have recently studied the Green belt assessment document. I have argued that our site has three strong( Durable ) boundaries on the west (Heath Lane )on the south (Sandy lane) and from the east on (Mustard lane ) and that our site is very unusual in having three roads in close proximity.

Heath lane is directly on the western border

Sandy Lane is separated from our site (002)by a lane of confluent properties with no possibility of further build as these properties have been built here in the eighties and nineties via infill permission . Our site border is confluent with 4 of these properties .as well as this is the existing northern inset boundary of Croft. Which is directly behind all these properties.

On Mustard Lane there are three properties [redacted] on the corner of [redacted] and [redacted] The border with Gresley house is totally confluent with our Eastern border. and some of the adjacent property( south of Gresley house)

There are no building opportunities along these roads with the possible exception of Gresley house applying for infill where their Tennis court is to the north of the house but this would not come under Strategic planning but a routine planning application which may or may not be considered.

I thus feel that both these borders South and East should be considered as Durable borders as I feel these borders can be considered as "A strongly established regular or consistent built form"

These properties are bounded by Fences. and very mature hedges in the case of the boundary with Gresley house to the East of our site.

I feel the combination of the northern Inset boundary and the lack of any residual land makes these borders very strong. and compliant with 3.5.2 Boundary definition Par 61 in the Green belt document. Within this pack is the Inset boundary map (1984 portion of it) and a map of the relevent properties on Sandy Lane and Mustard Lane and the one property of Heath lane on the corner with Sandy Lane. The northern border would remain partially weak but 25% of it has a property on Heath Lane with a large garden behind but there would be be change in the greenbelt boundary. If we were successful. I respectfully request my green belt assessment is reviewed to consider my points and changed to three durable .boundaries.

Again I would state that Heathcroft Stud (095) has three incredibly weak borders to the North,East and South which will result in further extensions in future..It is stated that the scenic pathway is a hard border in the Green belt assessment""The boundaries between the site and the settlement the west are non durable consisting of the the rear gardens of residential properties on Deacon close and a tree lined boundary with the playing field at Croft primary school to the west The boundaries between . the site and the countryside are of mixed durability the southern boundary is a hedge lined made footpath which is durable..The northern boundary is a field boundary with intermittent tree line which is not durable and the eastern boundary is an unmarked field boundary which is not durable.These non- durable boundaries are not able to prevent encroachment beyond the site if the site were developed."

I can see in paragraph 61 that a mature hedgerow can be considered a hard border but not private or unmade roads.It does not mention public foot paths but I would say that the next obvious connection in ? 15 years will be in connecting abbey drive to Bettysfield road across the field and the path will be left in the middle or restarted to the east. It is very likely that the path between Lord st and the current start of the path from Abbey close next to Heathcroft was lost with the Abbey close/ Deacon close development after demolition of the lovely Heath farmhouse (Heath farm) so I do not see this stopping encroachment south.to Bettysfield Rd In the line that the north and east boundaries are of

mixed durability it is difficult to understand this as I have taken photographs from the east which is mainly just a picket fence..

Thus in my opinion Heathcroft has 4 weak borders not three But even if you discount the south there are hundreds of acres of land to the east to Lady lane and to the north up Mustard lane.

With my arguments about the blatant openness of Heathcroft both internally and externally I cannot understand using the methodology that Heathcroft stud was assessed as a weak contribution to Green belt especially being such an eminent Equestrian centre it fits in so well with the rural setting.

Contrast this again with our site which cannot have any extent of development on 3 sides and to the north has an avenue of mature poplar trees and a very well established Hawthorn hedge which I see in Paragraph 61 "Mature hedgerow or contiguous fence line" as durable so I now feel that our site should be classified as Durable to the north just as Heathcroft has with the public foot path to the south.

In our assessment it states "The northern boundary is comprised of a mix of field boundaries and edge of residential properties which are less durable and will if the site were developed would not prevent encroachment";

This is not the case on Heath lane (West) there is one large house with garden extending about 80 metres along the northern border. The houses mentioned are a row of 3 cottages next to Gresley house on Mustard lane and their gardens do not connect with our site at all. There is also a thick Hawthorn hedge that has not been clipped for many years. Along the majority of the northern boundary. I enclose the relevant sheets from the Green belt assessment document

| LPA and Document Status  | Approach Overview   | Comments  |
|--|---|---|
| Rotherham Core Strategy (adopted September 2014)<br><br>Green Belt Review (April 2012)                                       | A total of 127 logical parcels were identified for the purposes of assessment based on character areas. Each individual parcel was set to be of similar character, to have a similar impact on the openness of the Green Belt and wherever possible to be clearly defined by durable, significant and strong physical boundaries that are capable of withstanding the passage of time. Parcel identification was informed by Rotherham's Landscape Character Assessment (2010). | The Review takes the existing inner Green Belt boundary, which was defined by the UDP, as the start point for assessment and covers the whole Green Belt  |
| Cheshire West and Cheshire Local Plan (adopted January 2015)<br><br>Green Belt Review Stage 1 (2011) and Stage 2 (July 2013) | The Stage 1 study divided the Green Belt around the urban area of Chester into ten manageable parcels based upon common features and characteristics. The parcels were then assessed against an assessment criteria based on the purposes of Green Belt. Stage 2 focused on a technical site assessments of these areas looking at site constraints.  | The area was broken down into manageable parcels and then assessed against the five purposes. The purpose of the study was to focus on the Green Belt around the urban area of Chester only and not the whole of the Green Belt |

### 3.5.2 Boundary Definition

- 61) The assessments reviewed all make reference to paragraph 85 of the NPPF and emphasise the importance of using physical features that are recognisable and permanent in defining boundaries. The methodologies are consistent in suggesting that strong boundaries are created by: infrastructure such as motorways, main roads and rail; and natural features such as watercourses, rivers or streams. In addition to this, a number of assessments include development that has a strongly established, regular or consistent built form; prominent topographical features; protected woodland; and ownership boundaries marked by physical features such as mature hedgerow or contiguous fence line. Weaker boundaries are defined by private or unmade roads, power lines and development with weak, irregular, inconsistent or intermediate boundaries.

Table 2: Approaches to boundary definition elsewhere

| LPA and Document Status   | Boundary Definition Overview   |
|---|--|
| Bath and North East Somerset Council Core Strategy (adopted in July 2014)<br><br>Green Belt Assessment Stage 1 (April 2013), Stage 2 (September 2013) | The parcels were already defined through the Core Strategy SA, however as part of the assessment the following features are considered to be potential barriers which could provide a permanent Green Belt boundary: road, railway, and large watercourse. |

| LPA and Document Status  | Boundary Definition Overview   |
|--|--|
| <p>Rushcliffe Core Strategy (adopted December 2014)</p> <p>Green Belt Review (June 2013)</p>                                       | <p>Existing features which are strong and durable are considered to include:</p> <ul style="list-style-type: none"> <li>• Roads</li> <li>• Railway lines</li> <li>• Rivers or streams</li> <li>• Prominent physical features such as ridgelines</li> <li>• Relative position of existing built up area</li> </ul>  |
| <p>Rotherham Core Strategy (adopted September 2014)</p> <p>Green Belt Review (April 2012)</p>                                      | <p>Strong boundaries are defined as a motorway; public and made roads; a railway line; river; stream, canal or other watercourse; prominent physical features (e.g. ridgeline); protected woodland/hedge; and existing development with strong established boundaries.</p> <p>Weak boundaries are considered to be private/unmade roads; field boundaries; power lines; non-protected woodlands/hedge and trees; and development with weak or intermediate boundaries</p> <p>In defining the Green Belt boundary, Rotherham also sought to apply general "operational criteria": Areas such as playing fields and open lanes which have no environmental or physical links to the open countryside are not included within the Green Belt, but those areas which extend the countryside into urban centres are preserved and fulfil an important function as "Green Wedges".</p> |
| <p>Cheshire West and Chester Local Plan (adopted January 2015)</p> <p>Green Belt Review Stage 1 (2011) and Stage 2 (July 2013)</p> | <p>This is focused around the urban area of Chester. The most evident durable physical boundary is considered to be the road network. In addition to this, physical features (embankments) and canals are deemed to be another defensible boundary. Where there are fewer robust defensible boundaries, mature hedgerows and similar physical features are used to define parcels. Overall the focus was on splitting the area into logical parcels that, where possible, had clearly evident hard boundaries such as the road, rail or waterway network and were of a manageable size for offices to undertake the site survey.</p>   |



## 4 Methodology

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### 4.1 Overview

62. As identified previously, there is no single 'correct' method for undertaking Green Belt Assessments thus this methodology has been informed by national policy, guidance and good practice, as identified in the preceding section. The methodology is considerably detailed in order to ensure transparency in approach and consistency in application. The inclusion of the rationale behind each element of the method is intended to provide clarity and aid consistent application. The methodology was agreed in advance with WBC.

### 4.2 Summary of Approach

63. In order to cover the whole extent of the Warrington Green Belt, a two stage approach was applied, this is summarised below and is illustrated in Figure 6.

#### Stage 1 – General Area Assessment

64. Stage 1 involved dividing the entire Warrington Green Belt into large parcels ('General Areas') which were then assessed against the five purposes of Green Belt. The General Areas were defined using recognisable and permanent boundaries. Further details on the approach to boundary definition are provided in Section 4.3.2.

#### Stage 2 - Green Belt Parcel Assessment

65. Stage 2 involved defining smaller Green Belt parcels around settlements on the edge or inset from the Warrington Green Belt and assessing these parcels for their contribution to the five purposes of Green Belt.
66. In relation to those General Areas which did not encompass any of WBC's inset settlements and/or were not adjacent to the settlement boundary, the findings from the Stage 1 Assessment were used to determine whether these General Areas should be divided into parcels. Where the General Area made a lesser contribution to Green Belt purposes (categorised as 'no' or 'weak' contribution), it was divided into smaller Green Belt parcels and assessed.

#### Stage 2A

67. In relation to those General Areas which performed poorly in Stage 1 (categorised as 'no' or 'weak' contribution), this stage provided the opportunity to consider whether a broader width of parcels (beyond the initial parcel width outwards from the settlement boundary) needed to be defined and assessed to provide a finer grain understanding of the General Areas' contribution to Green Belt purposes.

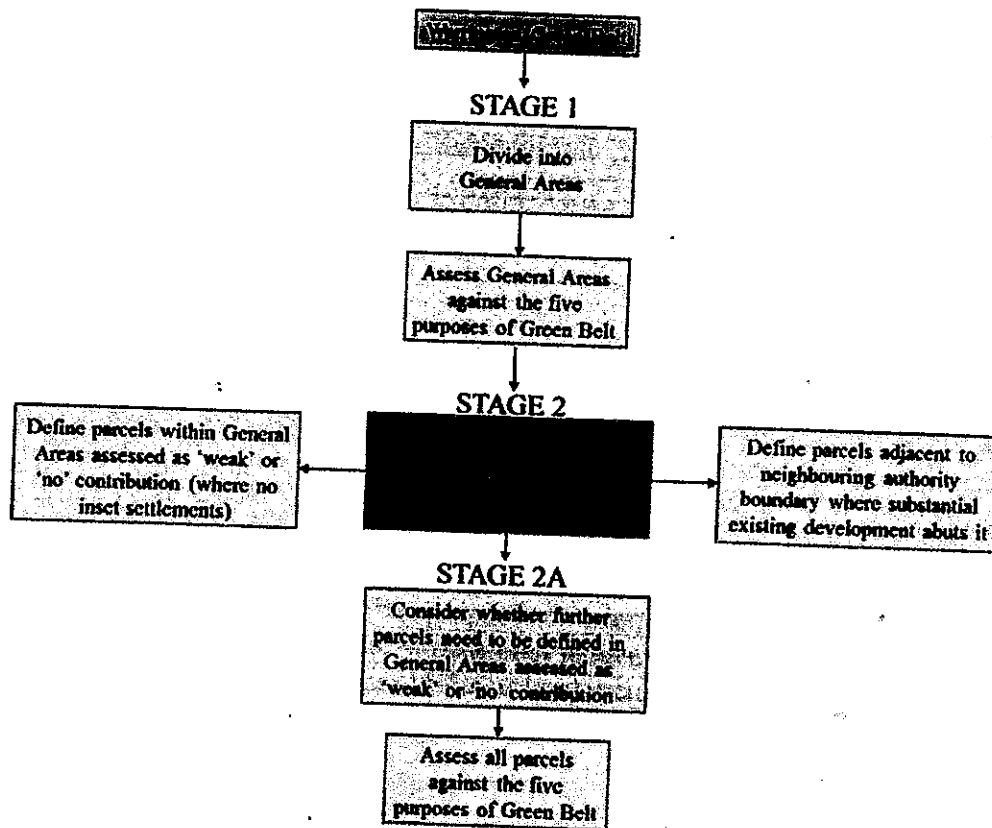


Figure 6: Overview of methodology

### 4.3 Stage 1 Methodology

#### 4.3.1 General Area Overview

68. The PAS Guidance from February 2015 emphasises that Green Belt is a strategic issue. It notes that an assessment of the "...*whole of the Green Belt*" should be undertaken. The use of General Areas therefore represents a holistic approach which helps to take into account strategic thinking and acknowledges the cumulative effect of smaller parcels to Green Belt purposes. It also provides an assessment for more rural areas of the borough including villages 'washed over' by the Green Belt.

#### 4.3.2 General Area Boundary Definition.

69. To ensure coverage of the whole of the Warrington Green Belt, the Green Belt was divided into General Areas using the most recognisable boundaries with the most permanence in order to encompass large areas. In accordance with paragraph 85 of the NPPF, local planning authorities should define boundaries clearly, "...*using physical features that are readily recognisable and likely to be permanent.*" An element of professional judgement was used in deciding how boundaries should be defined linked to the purpose of identifying General Areas. The good practice review set out in Section 3 demonstrates that a number of authorities have identified motorways, A roads, waterways, and operational or

safeguarded railway lines as representing strong 'permanent' boundaries. Whilst other natural and man-made elements can also create strong boundaries, it was decided that these elements represented the most recognisable and permanent physical features with which to divide the whole of the Green Belt.

70. The General Areas were therefore defined by motorway boundaries (consisting of the M6, M62 and M56), A roads, main waterways (the River Mersey, St Helens Canal and the Manchester Ship Canal) and railway lines (the West Coast Main Line and Liverpool to Manchester Line) via a desk top exercise. The settlement inset boundary was used to define the inner extent of the Green Belt and the WBC administrative boundary was used to define the outer extent. The inner extent of the Green Belt reflects the boundary defined in the adopted Local Plan Core Strategy (July 2014) and the GIS layer for this was provided by WBC.
71. The map at Appendix A (Map GA1) demonstrates the division of the Warrington Green Belt using these boundaries. This resulted in a number of disproportionately small General Areas which were more akin to parcels and therefore did not accord with the purpose of undertaking a General Area assessment. As a result of this, professional judgement was applied and a number of these 'small' General Areas (150ha or less) were merged together. The size threshold of 150ha was considered to maintain the strategic emphasis on this part of the review. In merging these General Areas, the following rules were applied:
- The 'small' General Area should not be merged across motorway boundaries given the permanence of such boundaries.
  - The 'small' General Area should not be merged across the Manchester Ship Canal given its permanence and role separating the north and south of the borough.
  - Subject to the above, the 'small' General Area should be merged with the smallest adjacent General Area.
  - The 'small' General Area should only be merged once unless the merged General Area is still below 150ha, in which case it can be merged again. The exception to this is where the General Area makes an important contribution to one of the purposes in its own right and professional judgement should be applied.
72. The table at Appendix A identifies which General Areas on Map GA1 were merged and the justification for this. The resultant General Area division is shown on Map GA2 below. These were reviewed with WBC and were agreed to represent a sensible division of the Warrington Green Belt.

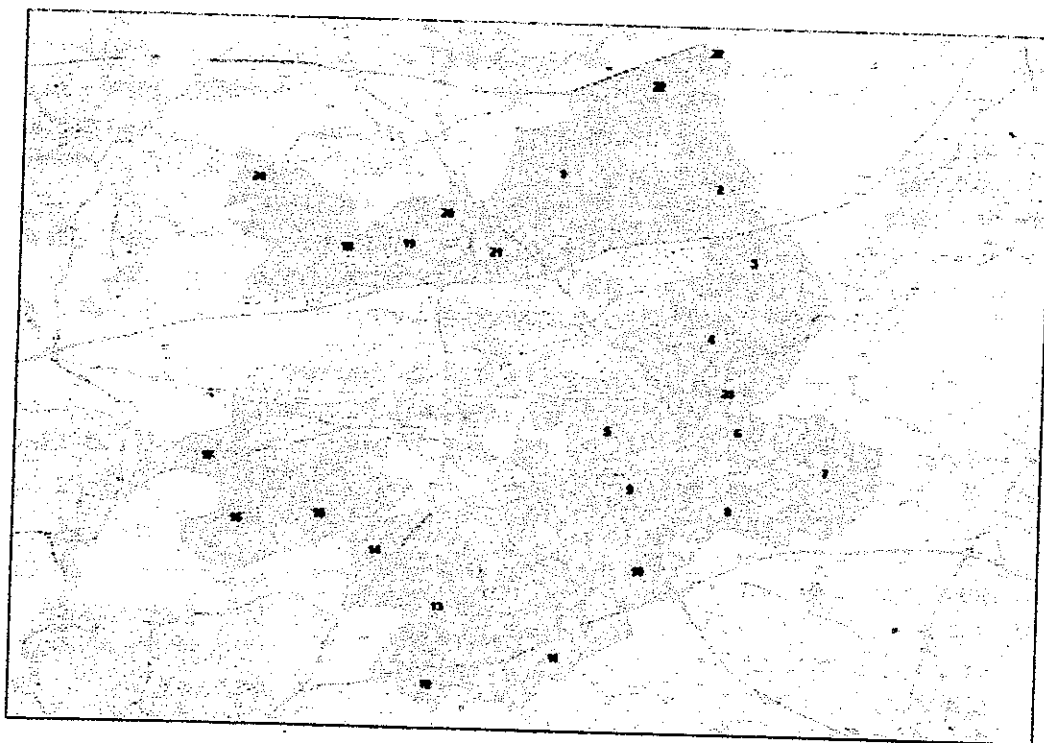


Figure 7: General Area Division (Ref: Map GA2)

### 4.3.3 General Area Assessment

73. A desk based assessment of these General Areas was then undertaken to determine the contribution each area makes to the five purposes of Green Belt, as set out in the NPPF. This utilised the GIS datasets provided by WBC and the Green Belt Purpose Assessment Framework agreed with WBC. The Green Belt Purpose Assessment Framework sets out the methodology for applying the five purposes of Green Belt. This was applied in assessing the Stage 1 General Areas and the Stage 2 Parcels to ensure a consistent approach was taken. The Assessment Framework is set out in Section 4.4.3 below.

## 4.4 Stage 2 Methodology

### 4.4.1 Parcel Boundary Definition

74. Following the Stage 1 Assessment, all areas of the Green Belt adjacent to WBC's inset settlements (as set out in Policy CC 1 of the adopted Local Plan Core Strategy)<sup>1</sup> were divided into smaller Green Belt parcels. The settlement inset boundary was used to define the inner extent of the Green Belt and parcels were always drawn from the settlement boundary outwards. Only one width of parcels was defined outwards. Stage 2A provided the opportunity for a further width of parcels to be defined in certain circumstances (see below).

<sup>1</sup> Appleton Thorn, Grappenhall Heys, Burtonwood, Hollins Green, Croft, Lymm, Culcheth, Oughtrington, Glazebury, Warwick

75. In relation to those areas of the Green Belt which were not adjacent to the settlement boundary (either WBC's settlements or settlements within neighbouring authorities), the results from the General Area assessment were referred to in order to determine whether it was necessary to define parcels in these areas. If the General Area assessment had concluded that these General Areas made a 'weak contribution' or 'no contribution' to Green Belt purposes, the General Area was divided into parcels. The reason for this was to provide a catch all approach to ensure all areas of the Green Belt were fully assessed particularly where there were lower performing against Green Belt purposes.
76. A desk based analysis was applied in the first instance, with site visits used as a sense check and in order to confirm these boundaries. Only existing boundaries were used. Boundaries relating to proposed development or infrastructure were not included.
77. Table 3 shows how parcel boundaries were defined and reflects Paragraph 85 NPPF requiring the use of "...physical features which are readily recognisable and likely to be permanent." Durable features were used in the first instance with parcels drawn from the settlement outwards to the nearest durable feature. Where this resulted in large expanses of countryside which was more akin to General Areas, features lacking durability were utilised in order to enable division of the Green Belt into manageable parcels. This required an element of professional judgement.

Table 3: Boundary Definition

|  |   |
|--|---|
| <p><b>Durable Features</b></p> <p>(Readily recognisable and likely to be permanent)</p>                              | <p><b>Infrastructure:</b></p> <ul style="list-style-type: none"> <li>• Motorway</li> <li>• Roads (A roads, B roads and unclassified 'made' roads)</li> <li>• Railway line (in use or safeguarded)</li> <li>• Existing development with clear established boundaries (e.g. a hard or contiguous building line)</li> </ul> <p><b>Natural:</b></p> <ul style="list-style-type: none"> <li>• Water bodies and water courses (reservoirs, lakes, meres, rivers, streams and canals)</li> <li>• Protected woodland (TPO) or hedges or ancient woodland</li> <li>• Prominent landform (e.g. ridgeline)</li> </ul> <p>Combination of a number of boundaries below</p> |
| <p><b>Features lacking durability</b></p> <p>(Soft boundaries which are recognisable but have lesser permanence)</p> | <p><b>Infrastructure:</b></p> <ul style="list-style-type: none"> <li>• Private/unmade roads or tracks</li> <li>• Existing development with irregular boundaries</li> <li>• Disused railway line</li> <li>• Footpath accompanied by other physical features (e.g. wall, fence, hedge)</li> </ul>   |



|  |  |
|--|--|
|  | <p><b>Natural:</b></p> <ul style="list-style-type: none"> <li>• Watercourses (brook, drainage ditch, culverted watercourse) accompanied by other physical features</li> <li>• Field boundary accompanied by other natural features (e.g. tree line, hedge line)</li> </ul> |
|--|--|

78. In relation to parcels which extended up to the WBC administrative boundary and the administrative boundary was not marked by durable features, parcels were drawn beyond the boundary to the nearest durable feature in the neighbouring authority.
79. Where settlements of neighbouring authorities abutted the Warrington Green Belt and there was substantial existing development immediately adjacent to the Green Belt, parcels were drawn from the outer Green Belt boundary inwards to the nearest durable feature. This was undertaken in the interests of Duty to Co-operate and due to the risk of cross boundary sprawl and encroachment from the neighbouring authority into the Warrington Green Belt.
80. Prior to being finalised, the parcels and the boundaries used were reviewed with neighbouring authorities and agreed under Duty to Co-operate arrangements.

#### 4.4.2 Stage 2A Further Division of General Areas

81. The outcome from the Stage 1 General Area Assessment fed directly into this stage. Those General Areas which were assessed as making a 'no' or 'weak' contribution to Green Belt purposes were reviewed in further detail in order to consider whether a second width of parcels (beyond the initial parcel width outwards) needed to be defined and assessed.

#### 4.4.3 Parcel Assessment

##### Overview

82. In undertaking the parcel assessment it was necessary to interpret the five purposes of Green Belt as set out in paragraph 80 of the NPPF given that there is no single 'correct' method as to how they should be applied.
- *“to check the unrestricted sprawl of large built-up areas;*
  - *to prevent neighbouring towns merging into one another’*
  - *to assist in safeguarding the countryside from encroachment;*
  - *to preserve the setting and special character of historic towns; and*
  - *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

83. For each purpose a number of criteria were developed requiring quantitative and qualitative responses and an element of professional judgement. Methods of data collection (e.g. desk based analysis or site based analysis) have been documented against each purpose. A qualitative scoring system was developed for each purpose and for the overall assessment, consisting of a scale of the parcel's contribution to the Green Belt purpose, these are shown and defined in Table 4 below:

Table 4: Qualitative scoring system to be applied against each purpose and overall

| Level of Contribution to Green Belt Purposes   |
|--|
| No – the parcel makes no contribution to Green Belt purpose  |
| Moderate – on the whole the parcel contributes to a few of the Green Belt purpose however does not fulfil all elements   |
| Strong – on the whole the parcel contributes to the purpose in a strong and undeniable way, whereby removal of the parcel from the Green Belt would detrimentally undermine this purpose |

84. As each of the five purposes set out in the NPPF is considered to be equally important, no weighting or aggregation of scores across the purposes was undertaken. An element of professional judgement was utilised in applying the scoring system however the 'Key Questions to Consider' for each purpose was intended to break down the purpose in the interests of ensuring a transparent and consistent approach. This is set out in detail below including definitions applying to the purpose and to the approach. Furthermore the rationale for the score applied and the justification against the criteria were recorded as part of the assessment.
85. Prior to undertaking any parcel assessments, all assessors were fully briefed on the methodology in order to ensure comprehensive understanding of the approach and consistency in assessments. Furthermore, prior to the assessors commencing the site visits, an initial batch of site visits and assessments were undertaken by an Arup assessor accompanied by WBC officers to provide a quality control check and to ensure there was consistent thinking and agreement in the application of the methodology.

**Purpose 1: To check the unrestricted sprawl of large built up areas**

**Definitions for Purpose 1**

**Sprawl** – *"spreading out of building form over a large area in an untidy or irregular way"*  
(Oxford English Dictionary)

**Large built-up areas** – this has been defined as the Warrington urban area and does not include any

of WBC's insect settlement or settlements within other neighbouring authorities

**Definitions for this Approach**

**Well connected (or highly contained)** – well connected to the built up area, i.e. to be surrounded by high levels of built development.

**Open land** – land which is lacking of development.

**Round-off** – where the existing urban area is an irregular shape, will the parcel fill in a gap and / or complete the shape

**Ribbon development** – a line of buildings extending along a road, footpath or private land generally without accompanying development of the land to the rear. A "ribbon" does not necessarily have to be served by individual accesses nor have a continuous or uniform building line. Buildings set back, staggered or at angles and with gaps between them can still represent ribbon development, if they have a common frontage or they are visually linked.

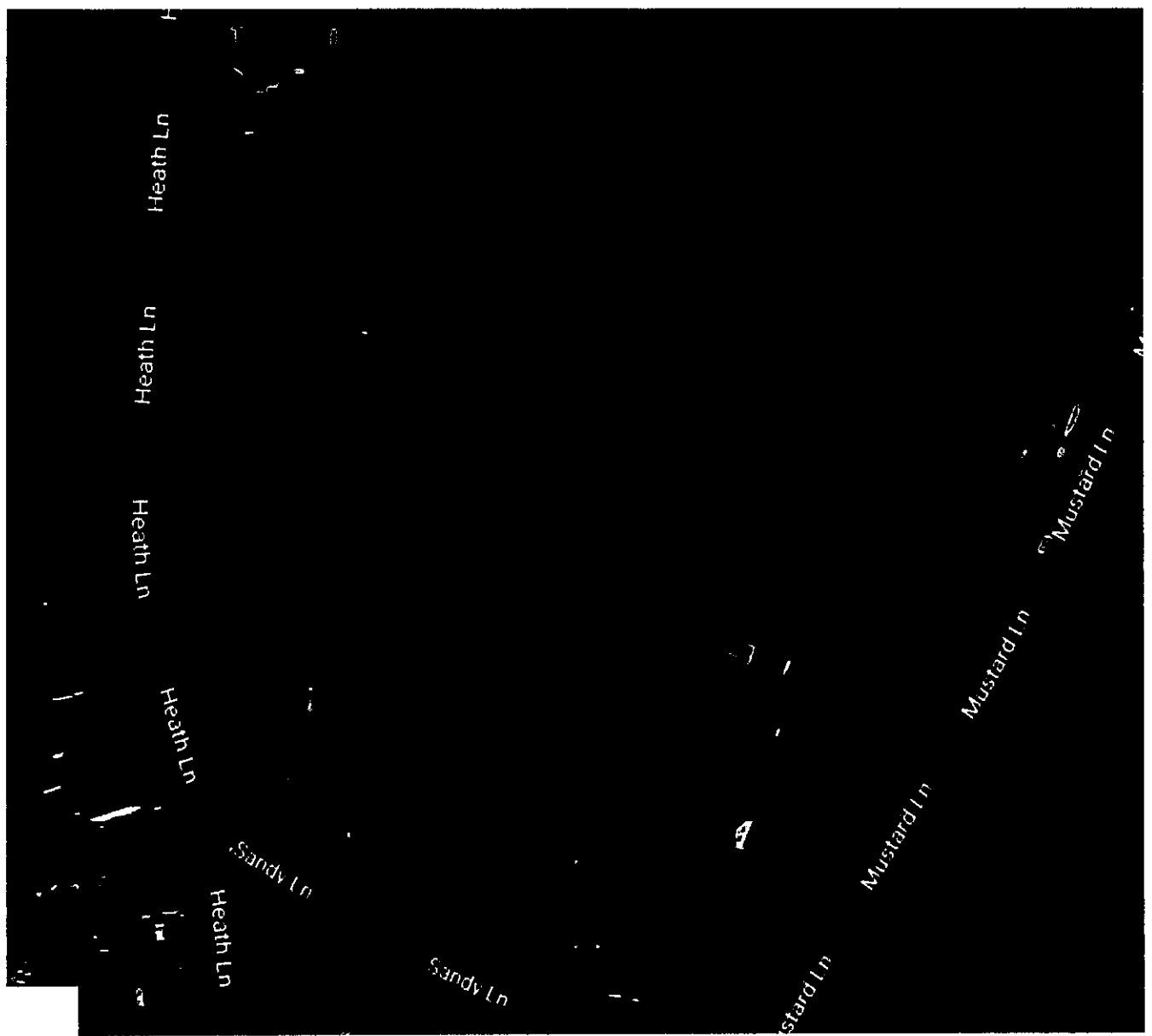
**Approach to the Assessment**

- 86. A desk and field based assessment was applied to this purpose.
- 87. As this purpose only applies to the Warrington urban area, if the parcel was not adjacent to the Warrington urban area it was assessed as 'no contribution'.

| Key Questions to Consider  | Recommended Approach   |
|--|--|
| <p>1. Is the parcel adjacent to the large built up area (defined as the Warrington urban area)?</p>  | <p>If yes, proceed to Stage 2...</p> <p>If no, conclude parcel makes no contribution to purpose 1</p>  |
| <p>2. Existing boundary with built up area: Is there an existing durable boundary between the built up area and the Green Belt parcel which could prevent sprawl?</p>  | <p>a. Describe existing boundary between built up area and parcel.</p> <p>b. If a durable boundary between the parcel and built up area exists, conclude parcels makes a weaker contribution to checking unrestricted sprawl.</p>  |
| <p>3. Connection to built up area:</p> <p>a. Is the parcel well connected to the built up area along a number of boundaries?</p> <p>b. Would development of the parcel help 'round off' the built up area, taking into account the historic context of the Green Belt?</p> | <p>a. Describe degree of connection to the built up area. If parcel is well connected (highly contained), conclude parcel makes a stronger contribution to checking unrestricted sprawl (unless part (b) applies).</p> <p>b. Identify potential for 'rounding off'. If development of the parcel would 'round off' the built up area, conclude parcel makes a weaker contribution to checking unrestricted sprawl.</p> |

## 13. Protecting Green Belt land

133. 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.
134. 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.
135. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should:
- a) demonstrate why normal planning and development management policies would not be adequate;
  - b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
  - c) show what the consequences of the proposal would be for sustainable development;
  - d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and
  - e) show how the Green Belt would meet the other objectives of the Framework.
136. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.



R18/PZ  
Site 1002  
(CR6#) on google Map

See Hard Border on Roads  
West e East e South

also established hedge with line of Poplars  
on North Border.



Looking South West From Mustad lane  
to N/A Border of 002



Mustad  
lane ↙

Northern Border of 002 Land West &  
Sandy & East of  
Heath lane

Houses seen are on Mustad lane

Northern Border is ~~is~~ well established trees &  
well established Hedge & Fence <sup>and at</sup> ~~are~~ end of trees  
to the West is a Detached property on Heath lane

So All 4 Borders are HARD

N ✓  
S ✓  
E ✓  
W ✓

No Visibility of Site From  
anywhere

All closed <sup>in</sup> NOT open <sup>open</sup> open countryside





Heath Lane  
 at site 02  
 looking South  
 (ARD)  
 North of  
 Sandy Lane  
 & East of  
 Heath Lane  
 R18/P21  
 HARD  
 BORDER  
 or  
 WEST 002



~~Heath~~ Lane  
 Looking North  
 East

Eastern  
 HARD  
 BORDER  
 Mustard lane

(Current  
 access to 002  
 is in front of  
 white BMW of  
 SANDY  
 LANE  
 looking  
 East)



South Border  
 HARD  
 WD Room  
 00M POR ow  
 SANDY  
 IN FILL land



R18/P2/002 Land W of A of Sandy lane  
East of Heath lane  
Co H



Overgrown  
Vegetation  
bushes looking  
to West  
to Heath lane



Overgrown  
Vegetation



Looking  
to West  
to Heath lane  
at W of A of  
site



LAND north of Sandy lane & East of Heath lane  
R18/P2/002



Enclosed site  
Looking East  
From West  
towards Mustard  
hole



South West  
Corner of site  
35 year old  
~~the~~ Mound of  
EARTH



Trees have  
overgrown over  
old caravan  
North West  
of site



Green Belt Assessment  
 R18/P2/002  
 LINDA NORA OF SOUTHWEST RIA of M...  
 LINDA C. F. F.

|            |  |   |  |
|------------|--|---|--|
| R18/P2/002 | No contribution: The site is not adjacent to the Warrington urban area and therefore does not contribute to this purpose | Weak contribution: The site forms a less essential gap between the Warrington urban area and Lowton whereby development of the site would slightly reduce the actual gap but not the perceived gap between the towns and it would not result in them merging. Overall, the site makes a weak contribution to preventing towns from merging. | moderate degree of openness.<br>Strong contribution: The site is connected to the settlement along its eastern and southern boundaries. These boundaries are comprised of the rear of residential development which is less durable and may not prevent encroachment if the site were developed. The site is connected to the countryside along two of its boundaries. The western boundary consists of the Health Lane which is durable and would be able to prevent encroachment if the site were developed. The northern boundary is comprised of a mix of field boundaries and edge of residential development which are less durable and would not prevent encroachment if the site were developed. The existing land use consists of a small field which some dense tree vegetation. There some dense vegetation in the site and along the northern and western boundaries. There is less than 10% built form on the site and the site appears to have a relatively flat topography. The site supports no long line views due to the dense vegetation and overall supports a strong-moderate degree of openness. Overall the site makes strong contribution to safeguarding from encroachment due its mix of durable and less durable boundaries with the countryside and its strong-moderate degree of openness.<br>Strong contribution: The site is not directly connected to the settlement. The site is well connected to the countryside on its sides, with mainly less durable boundaries. Health Lane forms a durable boundary along the sites western boundary which would be able to prevent encroachment if the site were developed. The remaining boundaries are less durable and consist of hedge lined field boundaries to the northern boundary and a fence along the eastern and southern boundaries. These less durable boundaries would not be able to prevent encroachment if the site were developed. The existing land use consists of open countryside. There are low levels of vegetation on the site. The site supports limited long line |
| R18/P2/003 | No contribution: The site is not adjacent to the Warrington urban area and therefore does not contribute to this purpose | Weak contribution: The site forms a less essential gap between the Warrington urban area and Lowton whereby development of the site would slightly reduce the actual gap but not the perceived gap between the towns and it would not result in them merging. Overall, the site makes a weak contribution to preventing towns from merging. |  |

|   |   |   |                            |
|---|---|---|----------------------------|
| <p>contribution: The site is adjacent to a historic town. The site does not cross an important viewpoint of the 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, a weak contribution to two. In line with the methodology, professional judgement has therefore been applied to evaluate the overall contribution. The site has been judged to make a strong overall contribution as it supports a strong-moderate degree of openness and there are less durable boundaries with the settlement and countryside therefore the site has a strong role in preventing encroachment into the open countryside. The site therefore makes a strong contribution to fulfilling the fundamental aim of the Green Belt under paragraph 79 of the NPPF in protecting the openness of the Green Belt.</p> | <p>Strong contribution</p> |
| <p>contribution: The site is adjacent to a historic town. The site does not cross an important viewpoint of the 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 two purposes. In line with the methodology, professional judgement has been applied to evaluate the overall contribution. The site has been judged to make a strong overall contribution as it is completely connected to the countryside, it supports a strong degree of openness and there are less durable boundaries between the site and the countryside</p>   | <p>Strong contribution</p> |

R18/P2/001

**D) A description and history of site R18/P2/002 Land north of Sandy Lane and East of Heath lane.**

This site is approximately 0.97 Hectares and would take approximately 30-35 houses. We have stated we would include affordable housing and possibly bungalows  
All considerations about transport, schools etc are the same as the Heathcroft stud(0095) except that our proposal would require a road access in the middle or north of the site off Heath lane Increased traffic would be half that of the 0095 site. with less concentration of fuel emissions

This field was purchased in 1951 by my parents and was all attached to the main house on Mustard lane. The land extended across all of Sandy lane on the south side and up Heath lane about 200 m- and up Mustard lane about 150 metres.

In the 1960's-1980's the north side of Sandy Lane and extending to Mustard Lane on the east up to Gresley House and one house on the corner of Heath Lane, was developed by infill to go from 1-7 houses on the original site. There is thus no land for any development south or East or west of the site

This gives a strong border on the whole of Sandy Lane. due to the 6 houses with no further space. The current narrow entrance to the site is in the centre of Sandy lane but this would not be suitable as Sandy lane is used as a rat run to the M6, Just behind these houses is the northern border of the inset village delineating the green belt.( please see Inset village Map Croft 1984.)

Heath Lane is a solid hard border blocking any further development on the west side. On the East side there is no possibility of further encroachment due to Mustard lane and the border with Gresley house and it's garden on Mustard lane making this a hard boundary.

On the northern border there is a large house on Heath lane with a garden behind it. There is then a large field on the northern border of our site before another Equestrian centre called Strides Equestrian (Sirocco).

The entrance to this is on Mustard lane on a bad bend making this field difficult to develop. I thus feel that our northern border is also strong.

In the 1950's the South East corner of the site was converted into a grass Tennis court and this has been a lawn since then and is the only part of the site that has been maintained for the last 68 years.

The rest of the site is mainly an overgrown jungle.

To the north of the Tennis court(Lawn) is a line of 5 huge Manchester poplars which are not safe as a large branch came down in a storm about 2 years ago.

The rest of the site has no impression of openness at all. and it is not visible in any direction due to the high hedge on Heath lane and the avenue of Lombardy poplars on the north boundary. In the 50's and 60's the field was used for 2 horses and there was a stable that was demolished due to it's poor state. There are some self seeded trees and bushes of different species and an avenue of trees to the north of the site which are mainly Lombardy poplars.

There has been no agricultural use for over 70 years apart from asking local farmers to cut the grass from time to time in the 60's and 70's..It has been used for running dogs but very little recently.

This site is basically desolate except for the tennis court area.

I cannot disagree more strongly with the green belt assessment. It is not open and is not visible from any road access point due to the height of the hedge on Heath lane.

There is only access from [REDACTED] and by an obscured pathway off [REDACTED]

[REDACTED]  
I have stated that I do not believe the assessment company accessed the site. I have questioned my brother, sister, niece and nephew and no one has shown anyone around the site. In my opinion I feel that the site was assessed by Google Earth unless they were using drones.

In the south west part of the site is a huge mound of earth covered by vegetation. This was from construction of [REDACTED]. This mound has remained since the mid eighties. Basically this site has been neglected by us for over 35 years.

This may give the impression of a lot of vegetation from a satellite picture but most of this is self seeding bushes and trees with the overgrown field centrally.

An old caravan from the 70s has been swallowed by vegetation over the years and is now within the trees.

This site is very enclosed as it is contained by Mustard lane and Heath lane diverging to either side of the site. There is no openness of the site with Hard boundaries on 3 sides and a long avenue of trees to the north. The site is full of overgrown vegetation and bushes. The only controlled area of the site (about 20 % of the site) is the Tennis court area (Lawn) in the south east.

I find it very difficult to see how this site is prone to encroachment because it is contained by 3 Hard boundaries. (please compare to 095)

Please compare this to Heathcroft stud which is an area which has been encroached since the 1960's. This was the site of Heath farm owned by the Lear family and later owned by the Marsh family relatives of the Heathcroft stud manager.

In the 60's first of all the old Croft primary school was demolished (which I attended.) This is at the triangle apex where Heath lane and Mustard lane commence. Then Croft Heath (where the school playground was) was developed with about ten houses despite being a pleasant green area that should have been preserved. The only remains of the school is a double garage now.

Croft Primary new school was built on a field belonging to Heath farm in the 60's which was where Deacons close is now.

A petrol station (Birchalls) near the top of Lord St was demolished and then the estate of Abbey close and Deacons close was built probably in the eighties, on the site of Heath farm.

There has thus been consistent encroachment to the east of Mustard lane and Lord St over the last 60 years and this is planned to continue with the Heathcroft stud application.

I will show with photographs how concealed and "unopen" our site is. I do not feel in anyway the site would be prone to encroachment as on Mustard lane with Heath farm being developed with the essential primary school and a large building estate on the site of Heath farm

**2) Discussion about the Green belt assessment of the Land north of sandy lane and east of Heath lane site R18/002 and Heathcroft stud 095**

**This site has been assessed as having a strong contribution to green belt using the five assessment tools**

**These are**

- a) 1 To check the unrestricted sprawl of large built up areas**
- b) 2 To prevent neighbouring towns merging into one another**
- c) 3 To assist in safeguarding the countryside from encroachment**
- d) 4 to preserve the setting and special character of historic towns**
- e) 5 To assist in urban regeneration by encouraging the recycling of derelict and other urban land.**

On looking at the assessment in purpose a)1 there is no contribution in either in 002 or in 095 so these cancel out

In purpose b)2) there is a weak contribution to both sites connecting towns together so both these cancel out.

In purpose C)3) it has been assessed that our site is strong in preventing encroachment of the countryside. In stating this it implies the site will prevent future development due to it's strong boundaries to the west on Heath lane only. It implies that the southern boundary and eastern boundaries are weak and would encourage development to the south and east of the site but this is not possible as I have explained previously as all the boundaries are fully developed on Sandy lane and Mustard lane. So there could be no development between the eastern and southern boundaries and the hard borders of Sandy lane and Mustard lane..The only possible development would be at Gresley house on Mustard lane north east of our site if they applied for infill for their tennis court.

I cannot understand where this building could take place. so I don't feel our site was adequately assessed or even accessed. physically.

This leaves only the northern border of the site. I do not believe this border would be a great threat as a new green belt northern boundary could be formed.

North of the site is a large residence on Heath lane going east to about 25 % of our border with the garden. Next is a large field and to the north east the house Sirocco which also has another equestrian centre.( Strides Equestrian).This is on a sharp bend on Mustard lane and I feel encroachment into this field is unlikely. Again I do not feel my site was assessed properly as they surely should have seen there was no land to develop to the east and south of the proposed site on a site visit..

**Concerning Heathcroft Stud (095)**

If this renowned and fully active( not derelict) equestrian centre (Heathcroft stud),. which has been a planning gain for the area is converted to a large building estate (under the claim that it is partially a brownfield site) is successful then there will be incentives for many other land owners to establish equestrian businesses and later attempt to gain planning permission for housing arguing they are a brownfield site.



I do not believe our site has a strong to moderate degree of openness..The trees to the north prevent any open views. The large earth mound looks like a building site( south of site).The uncontrolled vegetation gives the site a dark impression and the site looks smaller than it is due to excessive trees from self seeding,It is not possible to take a photograph showing more than about 100 m without including trees or vegetation and only in west to east or vice versa direction

The lawned area is shaded by the very large Manchester poplars which are potentially dangerous with the large fallen branch in the past.

This is in total contrast to the huge expansive views from Heath lane,Lady lane and Deacons close of the large fields over many Hectares towards Croft parish church where there is a total degree of openness..

If our site were developed it would strongly resist further encroachment due to the lack of further land available. There is only one moderately weak border to the north but to the north and east of Heathercroft stud there are hundreds of open scenic Hectares which will be further encroached on as all the land south of the site around Deacons close and Abbey close has been which was Heath farm previously Apart from the essential major building which is not ugly the equestrian centre is extremely rural and pleasing to the eye,The paddocks are just like open fields .

**d) 4To preserve the setting and special character of historic,towns.**

In this purpose both sites cancel out with no contribution but this is not the case with the only factor mentioned by the assessment team assessing green belt. This is on all the Croft sites,It states that;" the site is not adjacent to a historic town. The site does not cross an important viewpoint of the parish church" This is certainly the case for 002 our site However looking at the site line for Heathercroft standing in front of the playground of Croft primary school there is a clear view of the spire of this listed building. This view will be far more obvious from October to March when the trees in the distance would be bare. and probably most of the church will be visible. This view of the parish church across the open countryside from several parts of Mustard lane almost reminds one of Constable's Salisbury cathedral but on a lesser scale.

I thus feel that Heathercroft stud should have a contribution towards this purpose as it removes an important scenic view thus affecting the openness of the scenic landscape. I have photographs to support this opinion.

**e)5To assist in regeneration by encouraging the recycling of derelict and other urban land, In this purpose both sites are assessed in having a moderate contribution and so this purpose cancels out.**

But.I feel our site although not a brownfield site has been left derelict for many years. It is not industrial but has been ignored and neglected despite being close to the village centre I thus feel this could be considered as needing recycling as land for housing. under this purpose. This has caused excessive vegetation and small tree overgrowth and a large earth mound has been present for over 35 years .untouched. The only maintained area is the Lawn in the south east of the site. There are no brownfield sites in Croft to my Knowledge and if planners feel they can change an active Equestrian business in the country to a building estate just because it has a large building for training and stabling horses and a large paddock with shale covering for exercising horses then there will be a precedent for every Equestrian business to sell up and convert their sites for building.

Planing permission when given for the large Equestrian building and paddocks should have had

conditions imposed.

Most people would agree Equestrian centres are not agricultural since horses have not been used in agriculture for many years but they would expect these businesses to be allowed to be established in the countryside as they are the nearest use next to agriculture and have hardly any detrimental factors that would cause loss of amenity to local residents.

Bellway have tried to imply the reduction of vehicle movements would be positive but a few less Horse boxes a day are not HGVs and would be replaced by up 130 car and van movements twice a day. I do not regard Large horse boxes as HGVs and they certainly will not be delivering horses frequently.

I thus feel our site gives a stronger contribution in this purpose as our vacant overgrown field has had no agricultural use for over 70 years and it will not set a precedent by selection. But by turning an active and popular Equestrian site into a housing estate by calling it partially a brownfield site when it is not derelict would set a precedent for future applications, This business is active and the site is not derelict. and it contributes greatly to the rural village of Croft

### **Overall assessment**

In the overall assessment our site 002 is classified as having a strong contribution in protecting the green belt and I have argued against this. There are 3 hard durable borders with no risk of development on these fronts. Development to the north is unlikely and certainly far less likely than further ongoing encroachment north and east of the Heathcroft stud site up Mustard lane to the north and to the east across the highly open fields towards Croft parish church on Lady Lane. This site has a much higher degree of openness than our site with extensive views of fields on two sides with extremely weak borders which have been breached several times since the 1960's starting with the new Croft parish school. on a Heath farm field.

I cannot understand how our site has been classified as extremely open as it has no extensive views in any direction. In summary, the overall assessment of our site does not resonate in any respect with me. Whereas the Heathcroft stud site has widely open views to the north and east and only has a durable boundary on the west side with Mustard lane, houses on Deacon close and Croft Parish school.

It has a beautiful public pathway to the south of the site along the length of the Stud and this is covered with trees and bushes making a lovely tree tunnel. The character of this pathway to Croft parish church south of the site across the fields will be lost with the development as these trees may block light into some of the houses. The brook along the eastern border and running towards Lady lane is tiny and unlikely to block any significant development. The path can be seen on the inset village map provided(1984) If development to the south occurred it would badly affect this pathway to Croft parish church and Lady Lane

There could also be further development to the south to join up with Bettysfield road or even Eaves brow. This means it has weak borders on 3 sides.

The Heathcroft stud site is also scenic in itself with tidily fenced fields with thoroughbred horses and very extensive open views to the north and East

I cannot understand how it (095) has been classified as a weak contribution to green belt with a moderate to weak degree of openness due to the built form when the majority of the site has beautiful extensive views of open fields which will be lost. This degree of openness is clearly visible on distant views of the site from Lady Lane( close to Parish church) and Mustard lane in the Bellway/How document.

It would not be possible to take views like this of our site(002) as there is no degree of openness. I do not understand the assessment in the Heathcroft site safeguarding/encroachment purpose C) when it states that "the existing land use is in part open countryside(REPEAT OPEN COUNTRYSIDE) with a section in use by Heathcroft stud which is an equestrian centre. This

also provides beneficial uses in terms of outdoor uses in terms of outdoor sports and recreation. The site is flat with low levels of vegetation however has between 20-30 % built form with low line views in some places albeit restricted in others by the built form. Thus the site makes a moderate-weak degree of openness Overall the site supports a moderate contribution to safeguarding the countryside from encroachment as it has moderate-weak degree of openness however has non durable boundaries and therefore has a moderate role in safeguarding the countryside"

I have difficulty in understanding this. or their conclusions using this methodology. The large buildings in the south of the site are presumably the stabling and Livery areas as well as indoor training areas but they in themselves do not take away the openness of the whole site with extensive views and openness on the eastern and northern boundaries

It has three very extensive weak boundaries that can be encroached with the southern boundary bordering a scenic public footpath. I do not believe the footpath protects the southern boundary as developers will build south of it leaving the path intact but with loss of it's arched tunnel vegetation Despite all this it is regarded as weak-moderate openness and only a moderate role in safeguarding.

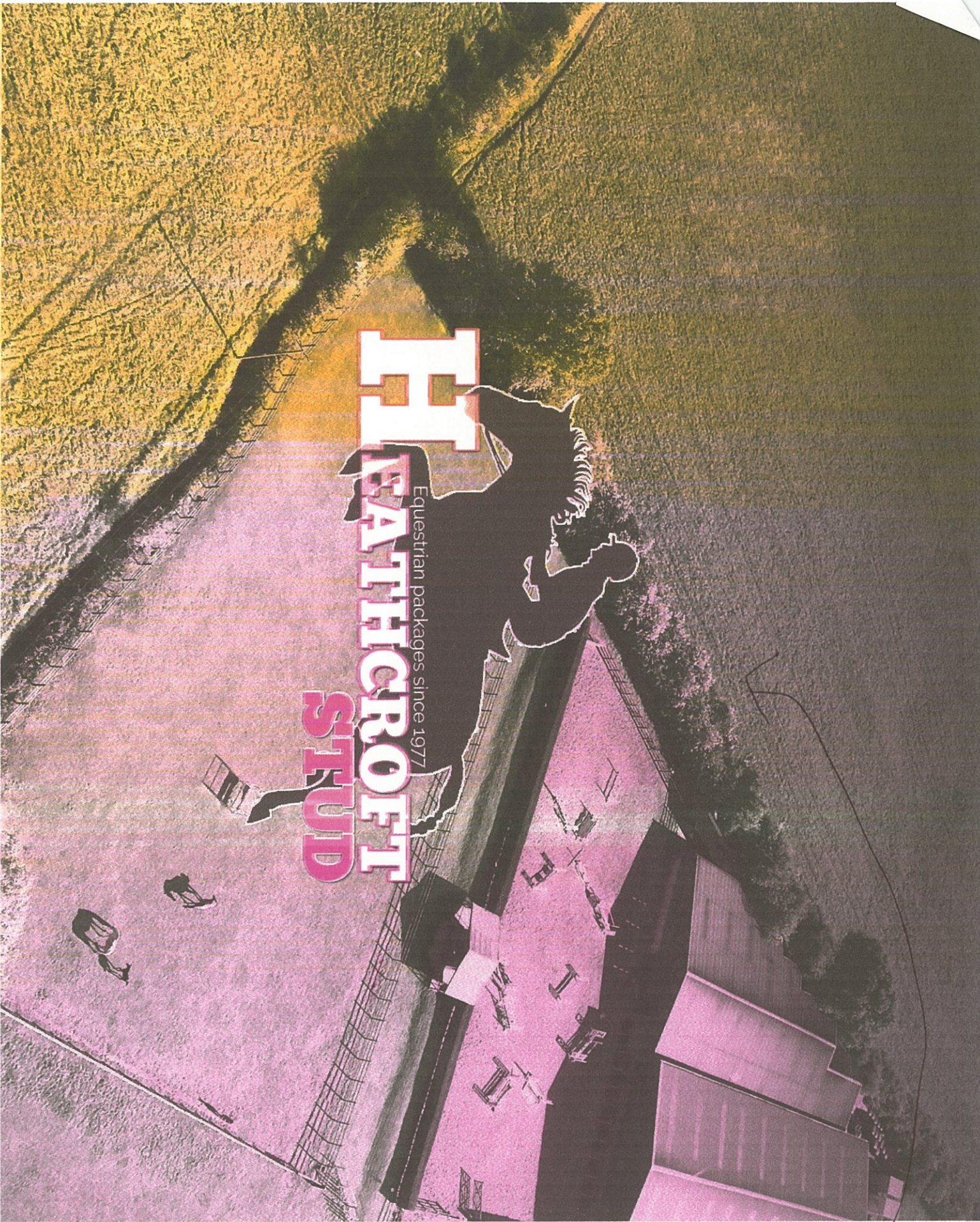
I have explained the longstanding 60 year encroachment of the east of Mustard lane and Lord st with the demolition of Heath farm house and the fields turned into Croft primary school as well as Deacon close and Abbey close and demolition of the petrol station off Lord st. Houses could be built south of the path I also do not understand the text about recreation with outdoor sports. I assume that sometimes there may have been Gymkanas on the site from time to time but it would be mainly for individual training for horses and riders so if it is turned into a building estate what benefit is this.?It is in fact a negative reason as this loss of recreation and outdoor equestrian sports will be lost at the expense of housing that could be built elsewhere.

In summary the councils view is that our site has a strong contribution due to purpose C3 which I dispute.( as above) I also feel we have no contribution to purpose (D)4 with no view of the church whereas 095 has a view of the church from Mustard lane which will improve in the winter. with no foliage

I also feel in E5 our field has been derelict for many years with no agricultural use , or maintenance. It is thus in need of recycling. My photographs will support the poor maintenance of the field so I feel there is some contribution to E5 Our site is not urban but I wonder if the neglect and dereliction of our site is a factor which is of relevance. This is in contrast to the active site at Heathcroft stud with the fields used for horses and the equestrian buildings in full use and all well maintained.

\*\*\*\*\*Nb I have been confused by the nomenclature so I am using 2 types. The council uses 1-5 for the purposes of greenbelt whereas the new NPPF uses a) to e). Apparently this is only in the new version see 13 par 134.





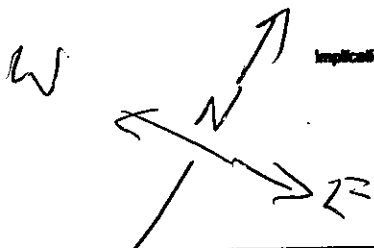
# HEATHCROFT STUUD

Equestrian packages since 1977

See  
Scenic  
Parkway  
on  
South  
Boulder  
off  
Site  
095

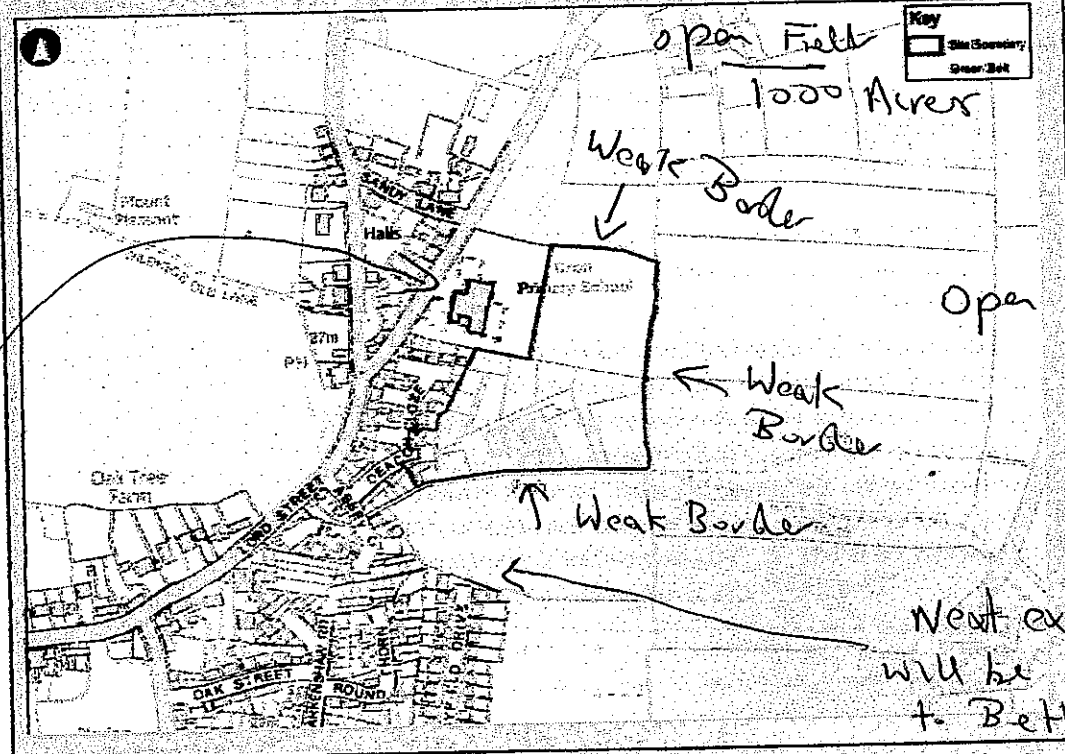


4.3 Croft



SHLAA Ref: 3155 / Site Ref: R18/095 / Site Ref: R18/P2/056

Land at Heathcroft Stud, Croft



View of Parish Church from Mustahol (D)

Parish Church not to seal Open Fields 1000 Acres

Next extension will be connection to Betty Rd RA

| 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? | <p>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.</p> <p>Purpose 2 – Development of the site would slightly reduce the gap between the Warrington urban area and Culcheth. 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.</p> <p>Purpose 3 – The majority of the site is currently in use as Heathcroft Stud (equestrian use) therefore on the whole development would not represent encroachment into the countryside. The northern section of the site consists of open countryside and development of this part would represent a small localised incursion into undeveloped countryside.</p> |

No Mainly used as green belt grazing for horses NOT BROWN SITE

previous New Green Belt borders have not protected site

You cannot count whole site of Heathcroft as Brown only the buildings as the Ref is still green belt and not dispersed? Brown

|  |  |
|--|--|
|  | <b>Purpose 4</b> – 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. |

YES IT DOES

3 Weak Borders

Not Weak For Green Belt Purposes

A beautiful equestria site



OS2

R18 / 095

Summer 19



End of  
 Scenic  
 pathway  
 going  
 towards  
 Parish church  
 on Lady lane  
 on Southern  
 Border of  
 site

End of the scenic pathway around the south of the site. Beautiful Rose ("Wild"). This high vegetation will all be cut back to allow light into gardens & houses and will not be a "hard" border. For long as the creeping encroachment will continue as in the last 40 years on the East side of Mustard Rd & Lord St. (as to the south it will connect to Bettyfield Rd.)



open field  
 at end of  
 pathway  
~~Does anybody~~  
~~at APT~~  
~~have eyes~~  
 There are open  
 borders  
 to North  
 EAST and  
 South

only stray border is West to Mustard



052

R18/095

Heath Croft

open views

From East

close to  
C. Rott pond

Church  
on Lady Lane  
Showing  
Footpath  
Sign

Equestrian  
Buildings  
Visible



LADY LANE

Wide open beautiful fields

No Enclosed areas



The established path South of Heath Croft Stud  
 is <sup>not</sup> a strong border Residents will not like the established  
 Vegetation & height of it and the covered pathway  
 will be cut back to give light to New gardens  
 A New green belt Boundary will not stop the area joining  
 Bettsworth RA in future



R18/09

OS 2  
CR0FT

South of  
Site

Weak  
Border

Scenic  
pathway  
with overhead  
cove



old path covered by established vegetation -  
will get cut down by house owners to let light  
into gardens & house. This path ~~is~~ leads to Croft Parish  
New Green Belt Border has not stopped their site  
being turned into housing despite it being 60%  
ie not Equestrian Building what are not Brown Belt  
unless Disused (and not become Disused just for  
the sake of House development. They are being used still

Then Horse  
at the Equestrian  
Centre  
are not  
on a  
Brown Field

Site





Real 8/095  
Walking back  
From  
Parish church  
towards  
Heath Croft  
Sted.  
Summ 2019



Extremely open countryside on 3 sides of site  
only 1 HARD border - Use is not Brown use  
but grazing of Horses on open fields with large  
equine Bullies. IF they want to move  
Apply for Bullies it set to <sup>be</sup> ~~put~~ converted to green belt  
by Norfolk planning channels as disused equine building  
<sub>and</sub> unable to be used for anything else



These  
green  
fields  
are not  
BROWN  
land  
They are  
still  
being  
used  
for  
Horses



R18/095 Heathcroft & Purpose 4

"The site DOES NOT cross the viewpoint for the Parish Church (ARUP)"

See green Belt assessment for R18/095

These photographs are taken in ~~June~~ Summer NOT Winter so view of church will be much better in Winter I have taken photographs in front of a school playground and the Parish spire is clearly visible

This site DOES cross the viewpoint for the church Purpose 4 of green Belts



← please see Deciduous leaves taken in Summer

Taken from Mustard Lane Looking East



outside Croft Parish School ~~Cross~~ Heathcroft site Behind hedge

Croft Primary School NO TRESPASSING

**3) Description of and history of Heathcroft stud site and the surrounding area with photographic evidence. Including the inset village of Croft map (1984) showing progressive development north and East of Heath Farm since that time. Heath Farm is now the area above Abbey Close and all of Deacon close east of Mustard Lane**

**Definition of brownfield site and NPPF guidance**

**Comments on Bellway homes/How planners document September 17**

**Summary of document ( all sections)**

As discussed previously Heathcroft stud is a large equestrian business running since 1977 specialising in Livery, Sales. Training and breeding of horses( Stud). Livery means renting stabling for horses. This includes stabling, feeding, Mucking out, turned, Tack cleaned, worked and grooming It also includes veterinary care and shoeing. Customers can ride their horses when they want and presumably may be able to keep their horse boxes on site..

The website claims that there is a waiting list for Livery. There are 56 stables. at the Heathcroft stud. It does not appear to be a business in recession and I have heard rumours that royalty have purchased a horse/horses from the Stud in the past .I also heard a rumour that Luciano Pavarotti, previously a keen horseman had considered purchasing a horse from Heathcroft stud some year ago I feel it has an excellent reputation in equestrian circles and it has part of the rural character of the village for many years.

I assume the large equestrian building was purpose built for the business and had not been built for Agricultural reasons. in the past. prior to the equestrian business .Permission will have been given to convert the land to an equestrian centre with stabling and exercise areas and being a green belt application there should have been conditions to prevent future conversion to building land.

This equestrian business in the greenbelt is a planning gain and probably even increases the value of the local houses and it cannot be considered as a derelict brownfield site.

I have contacted the parish council by phone and was told there have been no complaints about the business in terms of noise,, smell, large horse boxes entering/ exiting the site or any other disturbance.

I cannot see that this business can be truly regarded as a brown field site. in application terms

It is not derelict, has been a sustainable use of greenbelt land and has up to now prevented the slow continual encroachment of development to the east and north on Mustard lane.

This started with the demolition of the old primary school at the junction of Mustard and Heath lane.in the 1960's which was an essential development.

The scenic Croft Heath with the old school playground and air raid shelter was unwisely converted into a small housing estate in the 60's as well.

Croft new primary school was built on a Heath farm field in the 60's with it's playing fields, off Mustard lane opposite the new memorial hall.

In the 60's to 70's the petrol station east of Lord st was demolished and Abbey close was built followed by Deacon Close which is on the site of Heath Farm which was demolished. This was a lovely old Farmhouse

Heath farm used to be owned by the Lears but was later bought by the Marshes relatives of the Heathcroft stud owner. Presumably it was not listed.

Thus over the last 60 or so years there has been gradual encroachment up Mustard lane. which is not noticed by Strategic planners due to the long time scale and possible destruction of records..

In the last planning process for the UDP for Warrington in 2002 -2003 when I registered the site for consideration no green belt land was required but 2 sites were proposed by the UDP namely the Battlefield site and some site off Lady lane. There appeared to be no mention of these sites only 16 years later..

I have read the document produced by Bellway and How planners who had the benefit of their green

belt assessment about 20 months before my site was given a green belt assessment( or at least a published one)

They have strongly stressed their assessment as weak in green belt terms but have stated the site is partially brownfield

I believe that both green belt assessments are not sound and I was disadvantaged by the late assessment of my site and have stated my reasoning for this

I do not understand how an active equestrian business in greenbelt can apply for this site to be classified as land for development. in respect of the equestrian business proportion of the site .It is not classified as a true brownfield as it is not derelict .Our site is truly derelict but is not brownfield.

**A definition of a brownfield site is previously developed land that has the potential to be redeveloped.**

**It is often( but not always) land that has been used for industrial and commercial purposes and is now derelict and possibly contaminated. In the USA a brownfield site always refers to industrial land that has been abandoned and this is also contaminated with low levels of hazardous waste and pollutants.**

**Under the revised NPPF authorities have a responsibility to search for sustainable brownfield sites that have opportunities for development in the green belt.**

**The old NPPF confirmed that redevelopment of previously developed sites was not inappropriate and therefore did not require very special circumstances as justification provided it " would not have a greater impact on the openness of the green belt and the purpose of including land within it than the existing development.(paragraph 89)**

**Addressing this test principally required an applicant or appellant to demonstrate that a combination of footprint, volume, height and spread of the proposed development was no worse than the impact of the existing buildings with the overall conclusion judgement call by the decision maker.**

**The revised NPPF loosens this test by stating that redevelopment is not inappropriate where the proposal would not have a greater impact on the openness of the green belt than existing development or would not cause substantial harm to openness and would contribute to meeting an identified affordable housing need within the area of the local planning authority(par145)**

Considering the above it would appear that 60-65 houses on the Heathcroft stud site would be a greater effect on the openness of the site than the existing equestrian buildings and paddock areas which only represent about 20% of the site .I do not feel that this justifies promoting the site as brownfield as it is in no way derelict and most of the site where the horses graze is green fields with fencing. that is easily removed. In relation to affordable housing this can be available on all sites and is not specific to this site. In summary I do not feel this is a proper brownfield site and should not be given any priority because of the presumption to utilise sustainable brown field sites. in green belt.

A true brownfield site was developed some years ago in Croft on Lady lanc.. This was a derelict wartime camp of the Fleet air arm training establishment part of HMS Gosling . This consisted of old wartime barracks. It is now a moderate sized housing estate.

**Issues related to the document submission by Bellway Homes and How planners. In september 2017.in relation to the Heathcroft stud site (096) 5**

I would like to contest Bellway and How's claim that their site does not perform the purpose and function of the green belt as required by the NPPF and should be released from green belt. I do not agree that their site would be a logical extension to existing settlements in Croft and would protect the purpose and function of green belt as over the last 50-60 years there has been gradual encroachment up Mustard Lane and off Lord St as discussed previously at length. I understand that the owner of Heathcroft stud was related to the owner of Heath farm which was demolished and taken out of greenbelt to form Deacon close and Abbey close and this is just the next phase of the same farmland being developed.

I do not believe this is the golden thread of sustainable development as it will result in further encroachment in future years whereas my proposed site is compact and enclosed and has no significant openness and will not lead to encroachment.

My site (002) has 3 very strong and durable boundaries having roads on 3 sides (Heath lane, Sandy Lane and Mustard lane)

We would provide affordable housing and conform to all other recommendations eg provision of play area etc just as the Heathcroft stud site.

In relation to traffic movements I do not believe Bellway's comments about reducing traffic would be beneficial. I cannot see this site producing huge amounts of HGV movements. Most horse boxes are vans or small to medium sized lorries and they would not be entering and exiting frequently. There have been no traffic comments made to the parish council. over the years The traffic caused by 65 houses with deliveries will be far greater and involve up to 120 cars twice daily as well as school runs and internet deliveries. This will produce greater N2O emissions and large particle emissions with diesel cars behind Croft parish school and playgrounds, more so than the current horse boxes..

Our site would comply with all the conditions and paragraphs of the NPPF paragraph 14. Sustainable development in social ,economic and environmental dimensions together. Paragraph 7 14 and 29-41 in relation to green belt release, paragraph 83 and 84 in relation to special circumstances. And Paragraph 113

**Green belt assessment. In the Bellway/How document in relation to purpose 3 page 17.**

**It states " the boundary between the larger parcel of land which includes the site and the countryside consist of Mustard lane to the north and Lady lane to the east which are durable boundaries which could prevent encroachment beyond the parcel if it were developed. The development of the site would create a new strengthened long term green belt boundary and would align with the established residential area of Croft. Therefore the site will make a weak contribution to this purpose.**

**I am extremely concerned about this paragraph which does not make sense. at all. This document was written after they had had their green belt assessment which they knew about in Summer 2017 I did not know about mine until April 2019 and in writing not until late May 19. At the level of Heathcroft Stud Mustard Lane is travelling slightly north east and not north It is thus mainly west of the site. At Sirroco farm 300 m north towards Culcheth it bends around more to the north east such that at Little town (St Lewis's Croft catholic church and school ) one**



It was not put on the Croft site plan until 2019, after my application in August 2017.

I was thus put at a severe disadvantage with the competing site that was chosen receiving vital information almost 20 months earlier. This site had 3 application numbers and was obviously in constant contact with the department.

I do not feel my site was accurately assessed as the report does not appear to respect the hidden and non open character of our site and claims all 3 durable boundaries are weak despite no land being available between the site and Sandy lane, Heath lane and Mustard lane. It is very unusual to have a site with 3 roads bordering it. I do not believe our site is strong as a green belt site. It has been basically derelict for 50 years with no agricultural use for over 70 years.

I do not feel the green belt assessment of the Heathcroft site is sound or accurate as it does not respect the obvious openness of the site so clearly seen in pictures produced by Bellway of views from Heath lane and Lady lane from a long distance away. It does not agree the site has 3 weak boundaries on the north/east and south. It is assumed by Bellway that by making a new green belt boundary that this will prevent future encroachment which has not helped in the past, on land east of Lord St and Heath lane. I do not agree that Heathcroft stud performs weakly as a green belt site. It contributes a lot to the green belt using agricultural fields for grazing and exercising horses. It is an active and popular equestrian business also employing several people. Gaining housing permission for this equestrian site will cause a precedent for other Equestrian businesses to apply for housing developments in green belt.

Croft church is clearly visible from Mustard lane at the school playing fields level and building on this site will remove this view. Purpose 4D

In view of my opinions about these two sites I would respectfully ask to inspector to arrange for repeats of the two green belt assessments considering all my arguments and reconsider our site. I understand our site is a little further north than the Heathcroft stud site but it is just above the old Inset Croft village northern border. It's main strengths are the enclosed character of the site bounded by three roads with strong boundaries to prevent encroachment ( Purpose 3C) There is no impression of openness and the site is not visible from outside as well as being mainly derelict and not used for any recreational purposes with no agricultural use for over 70 years..( purpose 5E)

Another aspect of this document is that in photographing both my own site as well as Heathcroft stud at no stage did I go on the site of Heathcroft and all the photography that has shown the openness of the site both within the site and externally was using public access. On my own site the only pictures taken without access were the external boundary photographs.

We understand that this site does not meet the total need for housing in Croft (60-65 homes) but the officers state this is not a requirement so another site would need selection as well

Many of the other sites are either around the main Croft housing estates east of Lord St or off Heath lane or Mustard lane and many of these will have unprotected borders. Two other sites were considered by the authority but had access problems

In the event of my response being beneficial I can state our site would be available as soon as possible as it has not had any significant use for many years. I understand the other site would need time to close down or transfer the Equestrian business from the Settlement proforma document.

Thank you for your time and I apologise for the length of my documents

Dr Clive Freeman  
Other joint applicants  
Miss June Freeman

**Mr Nigel Freeman**  
**Mr Neil Bruce...**