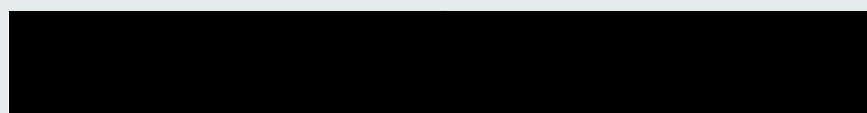




**Warrington Borough Council  
Local Plan  
2021- 2038**

**Updated Proposed Submission Version**

November 2021



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# **1 INTRODUCTION**

## **1.1 Context**

- 1.1.1 Gladman welcome the opportunity to comment on the Updated Proposed Submission Version of the Warrington Local Plan 2021-2038. Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.
- 1.1.2 Gladman has been involved throughout the plan preparation process of the emerging Warrington Local Plan, having previously submitted representations on the Local Plan Review Scope (Regulation 18) consultation in December 2016, the Preferred Development Options Consultation document in July 2017 and the previous Proposed Submission Version of the Local Plan in June 2019.
- 1.1.3 Gladman are supportive of the Council in the preparation of the Local Plan and are keen to remain involved throughout the process through to adoption. Accordingly, Gladman respectfully request that we are afforded the opportunity to participate at the upcoming hearing sessions for the Local Plan Examination in Public (EiP).
- 1.1.4 Gladman have a number of land interests within Warrington borough and these submissions provide further details on these. Gladman are continuing to work with landowners to bring forward high quality residential developments in a number of sustainable locations.
- 1.1.5 Gladman support the Council's decision regarding the need to review and amend the existing Warrington Green Belt boundaries in order to accommodate the necessary scale of housing growth within the plan area over the plan period.
- 1.1.6 Specifically, Gladman support the proposed housing allocation of Pool Lane/Warrington Road, which has been recommended to be released from the Green Belt in order to deliver a minimum of 170 new homes under Policy OS4. These parcels of land offer sustainable opportunities for the delivery of housing on the edge of Lymm. As demonstrated through the supporting Green Belt reports (Appendix 1 of these representations), these sites are suitable for release from the Green Belt.
- 1.1.7 Notwithstanding the above, Gladman recommend that the emerging Local Plan could benefit from a further degree of flexibility in the form of additional small/medium sized sites, as this would help ensure the effective delivery of the Plan over the course of the plan

period, particularly when the Plan does not identify any Safeguarded Land for development over the plan period and beyond.

- 1.1.8 In this regard, Gladman has provided details regarding two additional site submissions, one to the west of Lymm and another in Croft. Both of these submissions are supported by a site-specific Green Belt Review (Appendix 1 and 3 of these representations) prepared by Pegasus. Gladman believe that these sites are suitable for release from the Green Belt and offer sustainable, deliverable and achievable sites which would provide further flexibility and choice in the short to medium term.

## 1.2 Plan Making

- 1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

## **2 LEGAL COMPLIANCE**

### **2.1 Duty to Cooperate**

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Warrington Borough Council (WBC) must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3 The revised Framework introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more SoCGs, throughout the plan making process<sup>1</sup>. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

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<sup>1</sup> PPG Reference ID: 61-001-20180913

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## **2.2 Sustainability Appraisal**

- 2.2.1** In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2** WBC should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the authority's decision-making and scoring should be robust, justified and transparent.



## 3 NATIONAL PLANNING GUIDANCE

### 3.1 National Planning Policy Framework

3.1.1 On 24<sup>th</sup> July 2018, the former Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019 and July 2021. These publications are revisions to the initial 2012 Framework and implemented changes that were informed by the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and Planning for the Future consultation.

3.1.2 The revised Framework (2019) introduced a number of major changes to national policy which provide further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes reaffirm the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social and environmental priorities and to help shape the development of local communities for future generations.

3.1.3 In particular, paragraph 16 of the Framework (2021) states that Plans should:

***"a) Be prepared with the objective of contributing to the achievement of sustainable development;***

***b) Be prepared positively, in a way that is aspirational but deliverable;***

***c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;***

***d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;***

***e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and***

***f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."***

3.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Warrington Local Plan (WLP) provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.

- 3.1.5 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 3.1.6 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should consider when identifying and meeting their housing needs, with Annex 2 of the Framework (2021) providing definitions for the terms “deliverable” and “developable”.
- 3.1.7 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so, or the application of certain policies in the Framework would provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), local authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see paragraph 35 of the NPPF 2021).
- 3.1.8 The July 2021 revision to the NPPF provides greater focus on the environment, design quality and place-making alongside providing additional guidance in relation to flooding setting out a Flood Risk Vulnerability Classification at Annex 3, the importance of Tree-lined streets and amendments to Article 4 directions. Additionally, Local Plans which have not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years (See paragraph 22).
- 3.1.9 The amendments coincide with the publication of the National Design Guide and National Model Design Code, a toolkit which helps local communities to shape local design needs and provide guidance for creating environmentally responsive, sustainable and distinctive places with a consistent and high-quality standard of design.

## **3.2 Planning Practice Guidance**

- 3.2.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the Framework should be interpreted. The PPG has been updated to reflect the changes introduced by the revised Framework to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.

- 3.2.2 The Standard Method was introduced by the Government to simplify the process of defining housing need, avoid significant delay in plan preparation and ultimately facilitate the Government's ambition to achieve 300,000 new homes annually.
- 3.2.3 Revisions to the PPG on 20<sup>th</sup> February 2019 confirmed the need for local planning authorities to use the 2014-household projections as the starting point for the assessment of housing need under the standard method<sup>2</sup>.
- 3.2.4 It is also vital to consider the economic impact of COVID-19 and the long-term role that housing will play in supporting the recovery of the economy, both locally and nationally. We support the Council in its positive approach to planning for above the minimum requirement, which will enable Warrington to capture a larger proportion of the £7 billion yearly housebuilder contributions<sup>3</sup>. With 218,000 homes predicted not to be built due to COVID-19 from now to 2024/25<sup>4</sup>, it is also imperative that the WLP identifies sufficient land to support the delivery of homes.
- 3.2.5 In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. In this regard, Gladman supports the Home Builders Federation's recommendation that local plans should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.

### 3.3 National Planning Policy Consultations

- 3.3.1 In August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.
- 3.3.2 A further consultation on immediate changes to the current planning system closed in October 2020<sup>5</sup>. Of significant note is a proposed revised standard method for calculating local housing need, which proposed to incorporate a percentage of existing stock as the baseline of the calculation.

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<sup>2</sup> PPG Paragraph: 005 Reference ID: 2a-005-20190220

<sup>3</sup> MHCLG (2020). 'Planning for the Future'. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907647/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf)

<sup>4</sup> Shelter & Savills (2020). 'Over 80,000 new homes will be lost in one year due to COVID chaos'. Available at: [https://england.shelter.org.uk/media/press\\_releases/articles/over\\_80,000\\_new\\_homes\\_will\\_be\\_lost\\_in\\_one\\_year\\_to\\_covid\\_chaos](https://england.shelter.org.uk/media/press_releases/articles/over_80,000_new_homes_will_be_lost_in_one_year_to_covid_chaos)

<sup>5</sup> Ministry of Housing, Communities & Local Government: Changes to the Current Planning System Consultation <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

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- 3.3.3 In December 2020 the Government published their response to the ‘Changes to the Current Planning System’. This document provides an overview of the consultation responses before highlighting that it has been deemed that the most appropriate approach is to retain the Standard Method in the current form with an additional 35% uplift to the ‘post-cap number’ for 20 local authorities. The Government’s rationale behind this approach is to increase home-building in existing urban areas to make the most of previously developed brownfield land over and above that in the existing standard method.
- 3.3.4 The latest correspondence from Government regarding the revisions to the Standard Method for calculating local housing need will not affect the minimum local housing need which WBC should Plan for.
- 3.3.5 In her speech at the State Opening of Parliament in May 2021, the Queen announced that “laws to modernise the planning system, so that more homes can be built, will be brought forward...”. Notes accompanying the speech confirm that a future Planning Bill will seek to create a simpler, faster, and more modern planning system that ensures homes and infrastructure can be delivered more quickly across England. Timings on the publication of the draft Planning Bill remain uncertain, however, subject to the outcomes of this process, the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes. It will be important that the Council keeps abreast with the implementation of these changes to determine any potential implications for the Local Plan.

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## **4 LOCAL PLAN PROPOSED SUBMISSION VERSION**

### **4.1 Background**

4.1.1 The Warrington Local Plan Core Strategy 2006-2027 was adopted in July 2014. It sets out the planning framework for guiding the location and level of development in the borough up until 2027. The Local Plan Core Strategy was subject to a High Court Challenge, which was heard in February 2015, with judgment given on 19<sup>th</sup> February 2015 by Mr Justice Stewart.

4.1.2 The Judge ruled in favour of the Council on 6 of the 9 issues that had been challenged. The outcome has resulted in the removal of the following elements of the housing policies from the Local Plan:

- The housing target of 10,500 new homes (equating to 500dpa) between 2006 and 2027.
- References to 1,100 new homes at the Omega Strategic Proposal.

4.1.3 The Council are in the process of preparing a review of its Local Plan. Following previous consultation on the scope and contents of the Local Plan Review and its Preferred Options consultation, the Council has now prepared an Updated Proposed Submission Version, which is subject to the current public consultation exercise. The sections that follow below include specific comments from Gladman on the Council's emerging Local Plan.

### **4.2 Vision and Objectives**

4.2.1 Chapter 3 of the WLP sets out the vision for Warrington Borough to 2038. In this respect, Gladman support a number of aspects of the Council's vision, which seeks to provide a strong, sustainable economy that benefits everyone by consolidating the authority's position as one of the most important economic hubs in the UK through the development of major new employment locations, as well as the ambition that new housing development will support sustainable economic growth by focusing on creating attractive, well designed, sustainable and healthy communities meeting the needs of a wide range of people.

4.2.2 Objective W1 seeks to enable the sustainable growth of Warrington by delivering a minimum of 14,688 new homes over the plan period (equating to 816dpa) between 2021 and 2038 and supporting the ongoing economic success of the borough by ensuring provision is made to deliver 316.26ha of employment land over the same period. Whilst the housing requirement has reduced by 4,212 dwellings, Gladman support the use of the

phrase 'minimum' as housing requirements should not be seen as a cap or maximum level of development to be delivered.

- 4.2.3 The need for authorities to meet identified local housing need is a key Government objective for planning and has been adequately reflected in the vision. Whilst Gladman support the Council's vision, it is important that this is capable of being made a reality through the policies and site allocations contained within the WLP.

## 4.3 Policy DEV1 – Housing Delivery

### Housing Requirement

- 4.3.1 Policy DEV1 seeks to provide a minimum of 14,688 new homes over the plan period 2021 to 2038. This equates to an average of 816dpa. In setting the housing requirement of the WLP, the standard method has been used to determine the minimum requirement under the Government's Standard Housing Methodology. Gladman support the fact that the Council is meeting the minimum homes needed to meet demographic needs. However, we note that the Standard Methodology is the starting point for calculating housing need and only provides the minimum number of homes needed to meet the demographic baseline of needs. As set out within national planning guidance, WBC will also need to consider whether it is appropriate to plan for a higher level of need than the standard model suggests.
- 4.3.2 In this regard, it is noted that given the rate of job growth is forecast to decrease over time, the Council considers that in providing for needs of household growth there will be sufficient new homes to provide a balance for future jobs growth.
- 4.3.3 Furthermore, it is noted that the Local Housing Needs Assessment (2021) assesses the overall need for affordable housing and concludes that the overall need amounts to 433dpa between 2021 and 2038. The Standard Methodology already includes an uplift to help address the affordability of homes, however the delivery of affordable housing clearly remains a challenge in the borough.
- 4.3.4 Considering the above, Gladman reflect that there may be some merit in applying a modest uplift over the base need indicated by the Local Housing Need (LHN) figure to respond to affordability pressures in the borough. This would, in conjunction with achieving better paid jobs, have significant benefits in terms of more people accessing housing at an affordable rate.
- 4.3.5 It is also vital to consider the economic impact of COVID-19 and the long-term role that housing will play in supporting the recovery of the economy, both locally and nationally.

Utilising a housing requirement above the LHN could also help the Council mitigate some of the economic impacts from the pandemic by securing a larger proportion of housebuilder contributions.

#### Outlying Settlements

4.3.6 Gladman note that through this iteration of the WLP, the Council have outlined a series of proposed allocations on the edge of the outlying settlements which will require Green Belt boundaries to be amended for these to be delivered. In total, the outlying settlements will deliver a minimum of 801 dwellings over the plan period. Gladman support this approach and in particular the proposed housing allocation of Land at Pool Lane and Warrington Road, Lymm.

4.3.7 However, as will be discussed below, Gladman consider that there would be benefit in directing additional housing and allocations towards the outlying settlements to provide a greater choice and competition in the housing market and to allow timely delivery of the Sustainable Urban Extensions (SUEs). In particular, we submit that further sustainable growth opportunities exist on the edge of settlements such as Lymm and Croft, as detailed in section 5 of these representations. Allowing for an increased scale of delivery in these locations could provide additional flexibility through additional allocations, without harming the ongoing function of the Green Belt.

#### Flexibility Factor

4.3.8 Table 1 (Land Requirements over the Plan Period) suggests that the WLP will provide an additional 1,469 dwellings, over and above the Council's baseline housing needs, over the plan period 2021 to 2038. This represents a flexibility factor of 10% over the above housing requirement. Whilst welcome, in order to enhance the deliverability of the WLP, Gladman believe there would be merit in increasing this surplus in supply to 20% of the proposed housing requirement.

4.3.9 An increased surplus would take account of the fact that a significant part of housing supply is to be provided through two Sustainable Urban Extensions at South East Warrington and Land at Fiddlers Ferry, which will continue to deliver beyond the plan period. The itemised housing trajectory at Appendix 1 of the consultation document forecast delivery of a new garden suburb at 180dpa, however delivery will be dependent on the number of outlets acting on site.

4.3.10 In this respect, the updated Lichfields Start to Finish Report is a useful contextual document when trying to derive a future trajectory for sites and build out rates, which

demonstrates that sites of a similar scale deliver at approximately 160dpa. An increased flexibility factor may therefore help to ensure that should any slippage occur or these sites do not come forward as anticipated then the Council will be able to demonstrate a robust, flexible and responsive supply of housing land over the plan period.

- 4.3.11 If the expected housing trajectory for the SUEs is not achieved, then this risks the deliverability of the WLP. Increasing the surplus in supply provided through the WLP will help reduce this risk and maintain a plan-led approach.

#### Stepped Housing Requirement

- 4.3.12 Gladman note that through the WLP, WBC are proposing a stepped housing requirement, with the first five years (2021-2025) delivering at 678dpa and 870dpa for the remaining plan period (2026-2038).
- 4.3.13 Whilst Gladman believe that a stepped housing requirement is not the most growth orientated approach, a modification could help to ensure that the stepped housing requirement represents minimum figures, such that in the event that delivery in excess of the lower target in the first five-year period is achievable then this should not be restricted. The Framework is focused on boosting the supply of housing and any restrictive policy approaches should be avoided wherever possible.

#### Local Plan Review

- 4.3.14 Should monitoring indicate that a five-year deliverable and/or developable housing land supply can no longer be sustained, the policy states that WBC will give consideration to a review or partial review of the Local Plan.
- 4.3.15 Whilst Gladman support the principle of undertaking a review of the Local Plan if a five-year housing land supply cannot be sustained, we believe that it may be beneficial to modify Policy DEV1 to set out clearer commitments/triggers for commencing a Local Plan review and timescales for its preparation if it becomes clear that housing is not delivering at the expected rate.

## **4.4 Policy DEV2 – Meeting Housing Needs**

- 4.4.1 Policy DEV2 relates to a range of matters relating to meeting the housing needs of the borough.

#### Affordable Housing



- 4.4.2 Policy DEV2 requires residential developments of 10 dwellings or more, or with a gross floor area greater than 1,000sqm to provide affordable housing on the following basis:
- a. 20% on sites within Inner Warrington, inclusive of the Town Centre.
  - b. 30% elsewhere in the Borough and on all greenfield sites irrespective of their location.
- 4.4.3 Whilst Gladman support WBC in seeking to deliver affordable housing, it may also be appropriate for the Council to consider increasing its overall housing target and the level of market housing that will be delivered in the borough, so that it can deliver the required of affordable housing to meet its identified affordable housing needs.

#### Space Standards

- 4.4.4 The Nationally Described Space Standards (NDSS) as introduced by Government are intended to be optional and can only be introduced if there is clear evidence of need and viability. If it had been the Government's intention that all properties were built to these standards, then NDSS would have been made mandatory rather than optional.
- 4.4.5 Whilst Gladman appreciate the Council may want to introduce these standards, it is not evident from the information provided what the actual need for properties to be built to NDSS actually is. It is therefore not clear at present whether the case for NDSS has been justified.

#### Housing Type and Tenure

- 4.4.6 This element of the policy requires residential development proposals to provide a mix of different housing sizes and types and should be informed by the borough-wide housing mix set out at Table 3 (Housing Demand in Warrington), the sub area assessment contained in WBC's most up-to-date LHN assessment, and any local target set by a Neighbourhood Plan.
- 4.4.7 In accordance with the supporting text to Policy DEV2, Gladman support WBC's approach which identifies that housing mix should be considered on a site-by-site basis, taking account of the sub-borough analysis contained in the Council's most recent Local Housing Needs Assessment, so development sites can respond positively to the individual characteristics of the local area.

#### Optional Standards

4.4.8 Policy DEV2 also states that all homes should be built to Building Regulation Standard M4(2) 'Accessible and Adaptable dwellings' and 10% of all new housing will be required to meet Building Regulation M4(3) standards.

4.4.9 In this regard, Gladman query why the proposed M4(2) requirement has increased from 20% to a 100% requirement in the latest Proposed Submission Local Plan. The Council should ensure that the requirements of this policy and its supporting evidence base are in line with the relevant requirements of the PPG on Housing: Optional Technical Standards:

**“Based on their housing needs assessment and other available datasets it will be for the local planning authorities to set out how they intend to approach the need for Requirement M4(2) (accessible and adaptable dwellings), and / or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:**

- **The likely future need for older and disabled people (including wheelchair user dwellings).**
- **Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes, or care homes).**
- **The accessibility and adaptability of existing stock.**
- **How needs vary across different tenures.**
- **The overall impact of viability.”<sup>6</sup>**

4.4.10 Gladman note that these technical standards have been specifically identified as 'optional' in the PPG which, if to be included as a policy in the WLP, should be justified by robust evidence.

4.4.11 When considering this policy, WBC should ensure that it has taken account of the impact that these requirements, particularly M4(3) may have on scheme viability (due in part to size requirements) and the knock-on effects that this could have on the delivery of much needed housing. To be able to include such requirements in the emerging WLP, the

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<sup>6</sup> PPG ID: 56-007-20150327

Council will need to be able to robustly justify their inclusion and demonstrate that consideration has been given to this requirement within the viability study.

4.4.12 In addition to this, regarding M4(3), Gladman refer to the PPG which states:

**“Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.**

**Local plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.”**

4.4.13 This appears to suggest that M4(3) should only be applied to affordable homes and as such Policy DEV2 should be updated to reflect this.

## 4.5 Policy DEV4: Economic Growth and Development

4.5.1 Policy DEV4 seeks to make provision for 316.26ha of employment land to support both local and wider strategic employment needs over the plan period 2021 to 2038.

4.5.2 The WLP sets out a clear economic vision to meeting employment needs. The Local Plan should seek to meet its employment needs across a wide range of locations in order to address the needs of the borough’s businesses. It is vital that the emerging WLP contains policies which positively and proactively encourage the scale of development which is required to support the delivery of sustainable economic growth and in doing so contribute towards building a strong, competitive economy both locally and nationally.

4.5.3 The Plan’s ambitions for economic growth are reflected through the proposed allocation of 316.26ha of employment land. Whilst there is a current shortfall in employment land by around 8ha, this will likely be delivered through windfall development. The Council should be able to demonstrate that this level of windfall development will realistically come forward over the plan period.

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<sup>7</sup> PPG ID: 56-009-20150327

- 4.5.4 Furthermore, economic growth will need to be fully considered in setting an associated housing requirement to fulfil the Plan’s vision for Warrington as a location of positive growth and supporting ‘Warrington’s ongoing economic success’.

## 4.6 Policy GB1: Green Belt

- 4.6.1 Gladman agree that WBC has evidence to justify the exceptional circumstances required for Green Belt release, in accordance with the requirements of the Framework. Consequently, Gladman are supportive of WBC’s approach regarding the need to remove land from the Green Belt, particularly in the outlying settlements of Croft and Lymm, in order to meet its development needs.

### Safeguarded Land

- 4.6.2 Notwithstanding Gladman’s support for the release of land from the Green Belt, we note that it is the intention to ‘maintain the general extent of the borough’s Green Belt, as defined on the Local Plan Policies Map, throughout the plan period and to at least 2050’.
- 4.6.3 In this respect, whilst the emerging WLP should seek to ensure permanence of the Green Belt boundaries, paragraph 143 of the Framework describes how:

**“When defining Green Belt boundaries, plans should... (c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period...”**

- 4.6.4 Gladman note that this iteration of the emerging WLP does not identify any areas of safeguarded land, with the expectation being that the longer-term delivery of Local Plan’s site allocations and other potential windfall sites will provide sufficient flexibility in the authority’s housing land supply and negate any safeguarding requirement.
- 4.6.5 Whilst Gladman recognise that some sites such as South East Warrington and Land at Fiddlers Ferry are expected to deliver beyond the end of the plan period, we question whether this is the most appropriate approach to planning for the borough’s long term housing needs and the need to ensure the permanence of the Green Belt.
- 4.6.6 In this regard, we believe there is a distinction between the purpose of flexibility/contingency provided in the Plan by strategic allocations and potential windfall opportunities and that provided by safeguarded land. In this respect, the flexibility in the Plan can provide contingency within the plan period for instances where sites do not come forward as planned and to ensure that the plan is capable of delivering the full scale of

need within the plan period. Safeguarded Land on the other hand is to ensure that Green Belt boundaries endure well beyond the plan period.

- 4.6.7 Should any of the large-scale sites that form an important element of the authority's strategy fail to materialise or come forward as planned, there could be limited opportunities to meet the borough's long-term housing needs, without the potential release of further Green Belt land or the consideration of further Green Belt release through a future Local Plan review. With this in mind, the Council should therefore ensure that it has given proper consideration to the identification of safeguarded land, to enable the borough's Green Belt boundaries to endure well beyond the plan period now.
- 4.6.8 Gladman believe that there are sustainable and appropriate opportunities to release additional land from the Green Belt where such sites do not contribute towards the five purposes of Green Belt. In this context, we consider that it would be beneficial for WBC to reconsider its approach to safeguarded land.

#### **4.7 Policy ENV7: Renewable and Low Carbon Energy Development**

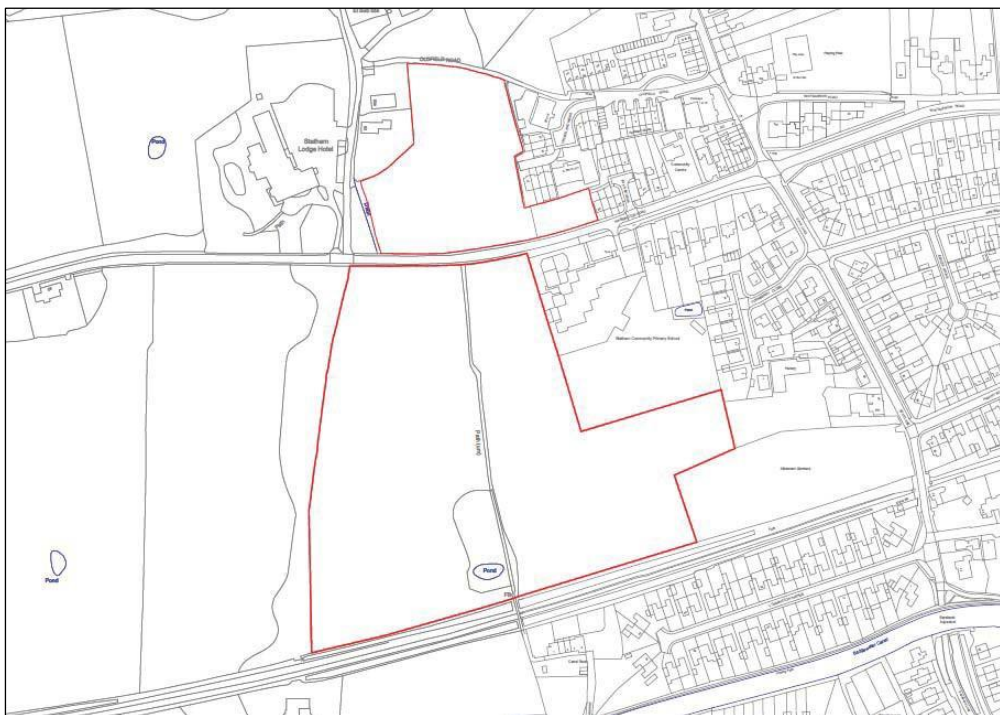
- 4.7.1 Part 4 of Policy ENV7 requires all major developments in locations outside of the strategic allocations to meet at least 10% of their energy needs from renewable and/or other low carbon energy sources, in addition to the.
- 4.7.2 Whilst Gladman are generally supportive of Policy ENV7's intentions, it is unclear how the requirements of this policy align with emerging national standards for energy efficiency, such as the Future Homes Standard, or the gradual tightening of Part L of the building regulations. The authority should therefore ensure that it has considered the interaction of Policy ENV7 with these emerging proposals, as well as any potential effects on development viability.

## 5 SITE SUBMISSION PROFILES

### 5.1 Site Allocations

#### Policy OS4 – Land at Pool Lane and Warrington Road, Lymm

- 5.1.1 As identified previously in these representations, Gladman are supportive of WBC's decision to allocate land to the west of Lymm (site location plan shown in Figure 1 below) in accordance with draft Policy OS4. Gladman submit that both of these sites represent sustainable and logical locations to deliver further residential development, and release land from the Warrington Green Belt.



**Figure 1** - Site Location – Land at Pool Lane and Warrington Road, Lymm

- 5.1.2 Land at Pool Lane and Warrington Road are not subject to any technical, landownership or viability constraints which would preclude their development. Both land parcels are being actively promoted on behalf of the landowners and can be delivered in the short term to contribute to Warrington's housing needs.
- 5.1.3 The remainder of this section describes both sites' suitability for residential development in further detail, taking account of the technical studies that have been undertaken to support the delivery of the sites to date, and WBC's proposed policy requirements.

#### New Homes

- 5.1.4 The sites could deliver a wide range of market and affordable homes to meet the borough's general and specialist housing needs. In accordance with WBC's emerging policy position, 30% of the homes would be delivered as affordable housing. The sites could be built out to a minimum density of 30 dwelling per hectare (dph), reflecting their edge of settlement location.

#### Community Facilities and Viability

- 5.1.5 Proportionate developer contributions towards the delivery of new community infrastructure, including the provision of new primary and secondary school facilities, and healthcare capacity, would be provided alongside any proposals.

- 5.1.6 Gladman is willing to agree to all requests for developer contributions which meet the relevant requirements of paragraph 57 of the Framework and CIL Regulations 122 and 123.

#### Open Space and Recreation

- 5.1.7 Generous areas of informal and formal open space will be provided as part of the sites' development, including the provision of a Locally Equipped Area for Play (LEAP) and Local Area for Play. The total area of open space provided as part of the sites' development would meet and exceed WBC's requirements.

#### Natural Environment

- 5.1.8 The development of sites would seek to respect and retain important landscape features wherever possible, including existing trees and hedgerows, and the existing pond.
- 5.1.9 A Landscape and Visual Impact Assessment has been prepared for the site and has identified that views of the two parcels from the surrounding area are generally limited due to existing landscape features, intervening vegetation and topography.
- 5.1.10 New tree and green infrastructure planting along the sites' boundaries would help to further filter views from the surrounding countryside, respect the character of the adjoining farmland, and ensure a sympathetic and logical extension to the existing settlement edge.
- 5.1.11 An initial ecology survey has been completed for both sites and has not identified any issues that could not be addressed through a series of tried and tested mitigation techniques. Through the provision of new green infrastructure planting, the creation of attenuation basins and other ecological enhancements, it is considered that the development can result in the delivery of net biodiversity gains.

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### Green Belt

- 5.1.12 As described in Section 4.6 above, in order to meet the borough's housing needs up to 2038, the Council has identified a requirement to review the authority's Green Belt boundaries, to deliver additional homes outside of the Warrington Urban Area and the confines of the authority's town and village boundaries.
- 5.1.13 In order to gain a better understanding of the relationship between the Green Belt and the two sites, Gladman has commissioned consultants Pegasus Group to undertake an independent Green Belt assessment to support its emerging development proposals, as detailed in Appendix 1 to this submission.
- 5.1.14 The results of this assessment clearly demonstrate that Land at Pool Lane and Warrington Road could be successfully developed without affecting the wider, on-going function of the Warrington Green Belt in this location and support the Council's decision to release the sites for development.

### Compensatory Green Belt Enhancements

- 5.1.15 The proposed wording of Policy OS4 in the Updated Proposed Submission version of the Local Plan also refers to the requirement to provide a scheme of compensatory improvements to the environmental quality and accessibility of land remaining in the Green Belt.
- 5.1.16 In this respect, we welcome the acknowledgement that financial contributions would be an appropriate mechanism to deliver such improvements where this would help to ensure that benefits would be maximised, and improvements would be delivered in the most appropriate location.

### Transport and Accessibility

- 5.1.17 Vehicular access to the two parcels can be achieved via staggered priority junctions from Warrington Road. It has been confirmed that the junctions can be accommodated with the necessary visibility splays, and that there are no third-party landownership issues that would prevent access being delivered in this location.
- 5.1.18 The sites benefit from existing footway provision to the north of Warrington Road, providing a direct pedestrian link into the Lymm settlement area, and access to its services and amenities in a suitable walking and cycling distance (the majority of Lymm's facilities, including its high street, would be situated within 2000m of the sites).

### Utilities and Environmental Protection



- 5.1.19 The sites could be safely developed in relation to flood risk and flooding would not pose a constraint to the sites' development.
- 5.1.20 In this respect, it is noted that the April 2021 revisions to the Environment Agency's Flood Map for Planning have altered the extent of flood zones in the borough and in relation to the Warrington Road and Pool Lane sites, as described in the Council's August 2021 Strategic Flood Risk Assessment Addendum. An appropriate surface water drainage strategy incorporating Sustainable Urban Drainage System (SuDS) principles would also be employed to ensure that the proposals do not increase the risk of flooding on-site or elsewhere.
- 5.1.21 The proposals could be served by new or enhanced gas, electricity, telecommunications and water supply infrastructure. It has been confirmed that there is sufficient capacity in the local sewerage network to accommodate the proposals.
- 5.1.22 The new properties provided as part of the site's development could be designed to incorporate energy efficiency measures and mitigate the impacts of climate change.
- 5.1.23 Air and noise assessments have confirmed that the sites' development would not give rise to any adverse impacts in respect of noise and air quality, and the proximity to Statham Lodge Hotel would not pose a constraint to development.

#### Historic Environment

- 5.1.24 A Built Heritage and Archaeological assessment has confirmed that there is no intervisibility between the sites and historic core of Lymm. On this basis it is considered that the site's development would not affect the significance of the Lymm Conservation Area or the Listed Buildings it contains.
- 5.1.25 Although Statham Lodge Hotel (Grade II Listed) is situated to the west of the allocation, views between the site and this heritage asset are heavily filtered by intervening vegetation, such that any development would have a limited impact on its significance.
- 5.1.26 Gladman and the sites' owners are supportive of the continued identification of Land at Pool Lane and Warrington Road, Lymm as proposed allocations within the Updated Proposed Submission Version of the Local Plan and would be happy to discuss any of the above details or submissions further with the authority's officers.

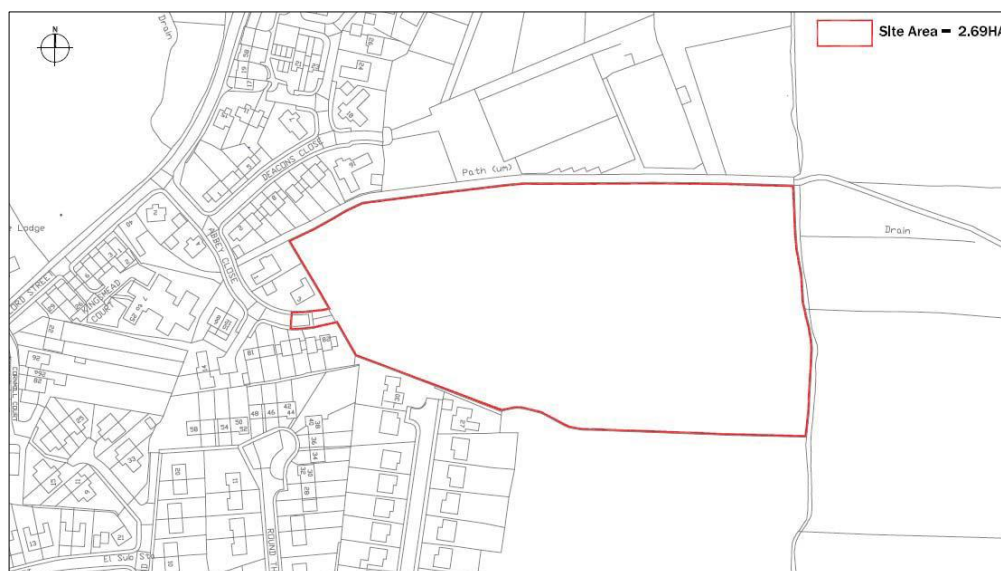
## **5.2 Additional Site Submissions**

### Introduction

- 5.2.1 As detailed through these representations, Gladman submit that the Council's Local Plan would benefit from further flexibility and contingency to ensure that the authority's spatial strategy is delivered, and sufficient homes are provided to meet the borough's needs. To this end, this section of our submissions highlights Gladman's other land interests, that could assist with these objectives.

#### Land off Abbey Close, Croft

- 5.2.2 Gladman are promoting Land at Abbey Close, Croft for residential development through the emerging WLP. The site is situated immediately adjacent to the Croft settlement boundary (as shown in Figure 2 below) and is ideally located to deliver further residential development to meet Warrington's housing needs.



**Figure 2** - Site Location – Land off Abbey Close, Croft

- 5.2.3 Land off Abbey Close is not subject to any technical, landownership or viability constraints that would preclude its development. The remainder of this section describes the site's suitability for development, taking account of the technical studies that we have undertaken to date, and describes how this site would represent a logical location to release land from the Green Belt.

#### New Homes

- 5.2.4 The site could deliver a wide range of market and affordable homes to meet the borough's general and specialist housing needs. In accordance with WBC's emerging policy position, 30% of the homes would be delivered as affordable housing. The site could accommodate housing at a minimum density of 30 dph, reflecting its edge of settlement location

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### Community Facilities and Viability

- 5.2.5 Proportionate developer contributions towards the delivery of new community infrastructure would be provided as part of any proposals. Gladman is willing to agree to all requests for developer contributions that meet the relevant requirements of paragraph 57 of the Framework and CIL Regulations 122 and 123.
- 5.2.6 Generous areas of informal and formal open space will be provided as part of the site's development, including the provision of a LEAP.

### Landscape

- 5.2.7 The development of site would seek to respect and retain important landscape features wherever possible, including existing trees and hedgerows. A Landscape and Visual Impact Assessment has identified that views of the site from the west, north and south are limited by a combination of built development and woodland, whilst views from the adjacent Public Right of Way (PRoW) would be heavily filtered by an existing hedgerow.
- 5.2.8 The development of the site would be closely related to the existing housing and built form within the settlement and seen in the context of existing dwellings situated off Abbey Close and Bettysfield Drive. Any development proposals could respect that character of the adjoining farmland, with new native tree planting provided alongside the eastern site boundary, to strengthen this edge to the village.

### Ecology

- 5.2.9 An initial ecology survey has been completed for the land and has not identified any ecological constraints that could not be adequately accommodated or mitigated as part of any proposals. Trees and hedgerows provide the majority of the site's ecological interest and would be retained and enhanced wherever possible.
- 5.2.10 The development of the site would provide opportunities to deliver ecological enhancements through new tree planting, the creation of an attenuation basin, and the potential to provide new areas of open space and planting that are attractive to wildlife. The development of the site would not affect the adjacent Local Wildlife Site.

### Green Belt

- 5.2.11 Land at Abbey Close was assessed as making a 'strong' contribution to the Warrington Green Belt as part of the Council's May 2018 Green Belt Additional Site Assessments (Site R18/155), however Gladman question this conclusion.

- 5.2.12 In the context of the proposed allocation of the Heathcote Stud site to the north, and existing residential development to the south, it is questionable whether the site would perform an ongoing Green Belt function. Once this allocation is brought forward for development, this parcel would become very enclosed by built form, and effectively an in-fill site. The development of the allocation to the north would create a strong development line to the east of the settlement, which would ensure that any development on this site would not result in further encroachment into the open countryside.
- 5.2.13 To gain a better understanding of the relationship between the Warrington Green Belt and Land at Abbey Close, Gladman commissioned consultants Pegasus Group to undertake an independent Green Belt assessment, as detailed in Appendix 2 to this submission. The results of this assessment clearly demonstrate that Land off Abbey Close could be successfully developed without affecting the wider, on-going function of the Warrington Green Belt in this location and makes a 'weak' contribution to the Green Belt overall.

#### Transport and Accessibility

- 5.2.14 Vehicular access to the site would be achieved via an extension of the existing highway leading from Abbey Close. The land is in the ownership and control of the landowners, and there are no third-party landownership issues that would prevent an access being delivered in this location.
- 5.2.15 The site is situated in close proximity to the existing services and facilities available in Croft, which would be accessible for pedestrians via Abbey Close. The nearest bus stops to the site are situated on Lord Street and Smith Brow and are served by frequent services to destinations including Culcheth, Birchwood Park and Warrington town centre.

#### Flooding and Drainage

- 5.2.16 The site could be safely developed in relation to the risk of flooding, whilst an appropriate surface water drainage strategy incorporating SuDS principles would ensure that the proposals do not increase the risk of flooding on-site or elsewhere.

#### Utilities

- 5.2.17 The proposals could be served by new or enhanced gas, electricity, telecommunications and water supply infrastructure. It has been confirmed that there is sufficient capacity in the local sewerage network to accommodate the proposals.

#### Air and Noise

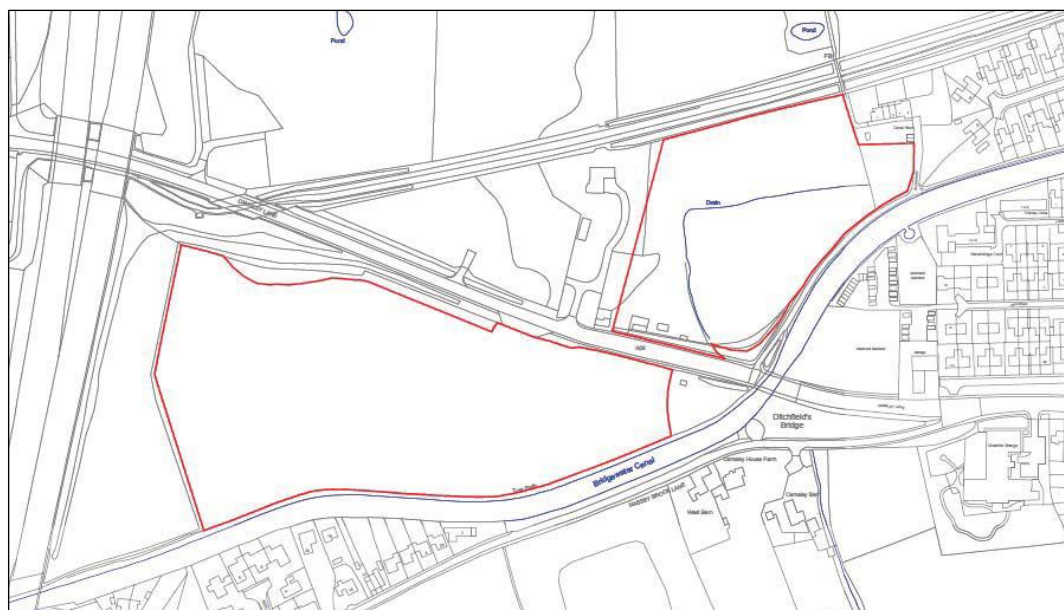
- 5.2.18 Air and noise assessments have confirmed that the site's development would not give rise to any adverse impacts in respect of noise and air quality, and that the amenity of future residents would not be affected in either of these respects.

#### Historic Environment

- 5.2.19 There are no designated heritage assets within the Site or its immediate vicinity. Within the wider area, the Grade II Listed Christ's Church is situated around 330m from the Site's eastern boundary. However, views west from Christ Church towards the proposed development Site already comprise modern residential development along its southern and western boundaries.
- 5.2.20 Any proposals for the Site could incorporate a view corridor towards Christ Church, which will be maintained and framed through strong building lines and appropriate landscaping. This will respect the existing views of the Grade II Listed church from within the Site.
- 5.2.21 Gladman and the site's owners would be happy to discuss any of the above points or submissions further with the Council's officers.

#### Land to the North and South of Camsley Lane, Lymm

- 5.2.22 In addition to its land interests at Pool Land and Warrington Road, Gladman have been appointed to promote Land at Camsley Lane, Lymm for residential development through the Council's emerging Local Plan (shown in Figure 3 below).
- 5.2.23 The site consists of two separate land parcels that are situated in a sustainable and logical location to deliver further residential development to meet Warrington's housing needs and complement WBC's existing plans for Green Belt release to the west of the settlement.



**Figure 3** - Site Location – Land off Camsley Lane, Lymm

- 5.2.24 The site is separated into two parcels by Camsley Lane. The northern parcel would be provided exclusively as open space/an area of ecological enhancement, with residential development focussed on the southern parcel.
- 5.2.25 Land at Camsley Lane is not subject to any technical, landownership or viability constraints that would preclude its development. The remainder of this section describes the site's suitability for development, taking account of the technical studies that we have undertaken to date.

#### New Homes

- 5.2.26 The site could deliver a wide range of market and affordable homes to meet the borough's general and specialist housing needs. In accordance with the Council's emerging policy position, 30% of the homes would be delivered as affordable housing.
- 5.2.27 The site could accommodate housing at a minimum density of 30 dph, reflecting its edge of settlement location.

#### Community Facilities and Viability

- 5.2.28 Proportionate developer contributions towards the delivery of new community infrastructure would be provided as part of any proposals. Gladman is willing to agree to all requests for developer contributions that meet the relevant requirements of paragraph 57 of the Framework and CIL Regulations 122 and 123.

- 5.2.29 Generous areas of informal and formal open space will be provided as part of the site's development, including the provision of a LEAP.

#### Landscape

- 5.2.30 The development of site would seek to respect and retain important landscape features wherever possible, including existing trees and hedgerows. A Landscape and Visual Impact Assessment has been prepared for the site and identifies that views of the southern parcel are generally limited due to existing landscape features, intervening vegetation and topography, and the M6 motorway embankment.
- 5.2.31 New tree and green infrastructure planting along the site's boundaries would help to further filter views from the surrounding countryside, respect the character of the adjoining farmland, and ensure a sympathetic and logical extension to the existing settlement edge.

#### Ecology

- 5.2.32 An initial ecology survey has been completed for the land to the south of Camsley Lane and has not identified any ecological constraints to its development. The land to the north of Camsley Lane contains a mixture of habitats, as it consists of unmanaged land at the present time.
- 5.2.33 Alongside the retention and enhancement of the existing habitats provided in the land parcel to the north of Camsley Lane, it is considered that the development will result in the delivery of net biodiversity gains through the provision of new green infrastructure planting, the creation of attenuation basins and other ecological enhancements.

#### Green Belt

- 5.2.34 As described in Sections 4.6 above, in order to meet the borough's housing needs up to 2038, the Council has identified a requirement to review the authority's Green Belt boundaries, to deliver additional homes outside of the Warrington Urban Area and the confines of the authority's town and village boundaries.
- 5.2.35 Land to the south of Camsley Lane was assessed as making a 'weak' contribution to the Warrington Green Belt as part of the Council's 2016 Green Belt study (Site LY28), which notes that the site is 'connected to countryside on all sides along durable boundaries which would be able to prevent further encroachment beyond the parcel if the parcel were developed'.

5.2.36 To gain a better understanding of the relationship between the Warrington Green Belt and the land to the north and south of Camsley Lane, Gladman has commissioned consultants Pegasus Group to undertake an independent Green Belt assessment, as detailed in Appendix 3 to this submission.

5.2.37 The results of this assessment clearly demonstrate that land to the south of Camsley Lane could be successfully developed without affecting the wider, on-going function of the Warrington Green Belt in this location. The Pegasus report concludes that the site makes a weak contribution to the strategic function of the Green Belt overall.

#### Transport and Accessibility

5.2.38 Vehicular access to the land to the south of Camsley Lane can be achieved via a new priority junction from the A56. It has been confirmed that the junction can be accommodated with the necessary visibility splays, and that there are no third-party landownership issues that would prevent an access being delivered in this location.

5.2.39 The site benefits from existing footway provision to the north of Warrington Road, providing a direct pedestrian link into the Lymm settlement area, and access to its services and amenities in a suitable walking and cycling distance (the majority of Lymm's facilities, including its high street, would be situated within 2000m of the site).

#### Flooding and Drainage

5.2.40 The land to the south of Camsley Lane site could be safely developed in relation to the risk of flooding, whilst an appropriate surface water drainage strategy incorporating SuDS principles would be employed to ensure that the proposals do not increase the risk of flooding on-site or elsewhere.

#### Utilities

5.2.41 The proposals could be served by new or enhanced gas, electricity, telecommunications and water supply infrastructure. It has been confirmed that there is sufficient capacity in the local sewerage network to accommodate the proposals.

#### Air and Noise

5.2.42 Air and noise assessments have confirmed that the site's development would not give rise to any adverse impacts in respect of noise and air quality.

5.2.43 Whilst land to the south of Camsley Lane lies in close proximity to the M6 motorway, any effects of road traffic noise could be addressed through the orientation and layout of



dwellings. Appropriate measures would be put in place to respond to the site's proximity to the M6 motorway Air Quality Management Area (AQMA 1).

#### Historic Environment

- 5.2.44 A Built Heritage and Archaeological assessment has confirmed that there is no intervisibility between the site and the historic core of Lymm. On this basis it is considered that the site's development would not affect the significance of the Lymm Conservation Area or the Listed Buildings it contains.
- 5.2.45 Gladman and the sites' owners would be happy to discuss any of the above points or submissions further with the Council's officers.

## **6 CONCLUSIONS**

### **6.1 Summary**

- 6.1.1 Gladman welcomes the opportunity to comment on the Updated Proposed Submission Version of the Warrington Local Plan 2021-2038. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2021) and the associated updates that were made to Planning Practice Guidance.
- 6.1.2 Gladman are supportive of the Council in preparing the Local Plan Review and are supportive of the need to amend the borough's Green Belt boundaries in order to accommodate the scale of development that is required to meet the authority's housing needs. This approach is in line with national policy and practice guidance and provides a positive approach to growth in Warrington to ensure the vision and objectives of the Local Plan can be delivered.
- 6.1.3 Specifically, Gladman welcome the allocation of Policy OS4 in Lymm. Gladman submit that this site represents a sustainable and logical location in which to deliver further residential development and release land from the Warrington Green Belt. Land at Pool Lane and Warrington Road are not subject to any technical, landownership or viability constraints that would preclude their development. Both land parcels are being actively promoted on behalf of the landowners and can be delivered in the short term to contribute towards Warrington's housing needs.

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- 6.1.4 Notwithstanding the above, having considered the Warrington Local Plan, Gladman have raised some queries regarding the overall approach and spatial strategy. In this regard, Gladman recommend further flexibility is required within the Local Plan, through additional small/medium sized sites, to help ensure that the Plan is deliverable over the plan period. Gladman also believe that the Plan would benefit from the addition of safeguarded land.
- 6.1.5 In addition to the proposed allocation at OS4, Gladman are promoting further land to the west of Lymm, at Land North and South of Camsley Lane, and Land off Abbey Close, Croft. Submissions for these sites have also been included as part of these representations. Gladman believe the allocation of these sites could provide greater flexibility in WBC's housing land supply. These submissions have referred to individual Green Belt reports regarding the sites prepared on Gladman's behalf by Pegasus Group.
- 6.1.6 Gladman request to be kept informed of the progress with the Local Plan and request to participate at the EiP in due course.

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## **APPENDICES**

### **Appendix 1: Land off Pool Lane and Warrington Road, Lymm – Pegasus Group Green Belt Report**



**WARRINGTON UPDATED PROPOSED SUBMISSION  
VERSION LOCAL PLAN 2017-2038 CONSULTATION**

**GREEN BELT ASSESSMENT**

**LAND AT POOL LANE AND WARRINGTON ROAD –  
LYMM**

**GLADMAN DEVELOPMENTS LTD**

Date: November 2021

[Redacted]

Pegasus Group

[Redacted]

[Redacted]

[Redacted]

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

[Redacted]

[Redacted]

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## **1. INTRODUCTION**

1.1 This Green Belt Assessment has been prepared on behalf of Gladman Developments Ltd (Gladman) in respect of their land interests at Lymm Pool/Warrington Road. Gladman are in control of 13.88 hectares, made up of four parcels (A-D) to the west of Lymm (see Appendix 1). This Green Belt Assessment relates specifically to Parcels A and B. Parcel A is known as land at Pool Lane and Parcel B is known as land at Warrington Road.

1.2 This assessment sets out the relevant national and local planning policy before going on to assess the contribution that the sites make, and impact that the development of these parcels would have on the five purposes of Green Belt.

### **National Planning Policy Green Belt Considerations**

1.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The document was initially published in March 2012 and since revised in July 2018, February 2019 and July 2021. The updated Submission Version of the Warrington Local Plan (2017-2038) was published for public consultation in September 2021. As such the Local Plan will be considered by the Inspector under NPPF (2021).

1.4 Chapter 13; Protecting Green Belt land of the NPPF sets out the importance of the Green Belt. Paragraph 137 advises that the essential characteristics of Green Belt are their openness and their permanence. Paragraph 138 confirms that the five purposes of the Green Belt are:

- 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.

1.5 Paragraph 140 of the NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances which have been 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.

### **Green Belt Around Warrington & Local Planning Policy**

1.6 The Green Belt around Warrington was first formally designated in the Cheshire Structure Plan 1977 (adopted 1979) with the Green Belt boundary drawn around the existing settlements and the areas outside of the New Town Designation. Later alterations of the Structure Plan in 1985 and

1999 did not change the extent of the Green Belt boundary. Whilst minor amendments to the Green Belt boundary were made through the 1998 Unitary Development Plan, the Local Plan Core Strategy (2014) did not alter the Green Belt boundaries and therefore the current Green Belt boundaries are still based upon the original designation some 40 years ago.

- 1.7 The development plan comprises of the adopted Warrington Local Plan Core Strategy (July 2014). Following its adoption, a legal challenge was made with respect to the housing policies contained within the Warrington Local Plan Core Strategy with the Plan's housing target and reference to the delivery of new homes at the Omega strategic development site being overturned.
- 1.8 Warrington Borough Council (WBC) are in the process of preparing their Local Plan. The Submission Version of the emerging Local Plan was published in April 2019. Following this, an updated Submission Version of the emerging Local Plan (2021-2038) was published in September 2021 and is being consulted on until November 2021.
- 1.9 The emerging Local Plan is supported by a Green Belt assessment prepared in October 2016 (by Arup) to assist WBC in considering whether 'exceptional circumstances' exist to justify altering Green Belt boundaries through the Local Plan, as well as an additional Green Belt Site Selection: Implications of Green Belt Release document that has been prepared for the current updated Proposed Submission Version of the Local Plan. This document provides a review of the options for the Plan's spatial strategy.
- 1.10 The Updated Proposed Submission Version of the Local Plan confirms that the primary exceptional circumstance relating to the need for Green Belt release is to ensure that there is sufficient land to meet the borough's development needs. It is clear within the available evidence that there is insufficient land within Warrington's existing urban area and greenfield sites to meet its housing and employment needs going forward. As stated in the Updated Submission Version of the Local Plan, the existing urban area can accommodate around 11,785 new homes. This means there is still the requirement to provide land for around 4,400 homes through the release of Green Belt land to accommodate the development needs throughout the plan period and beyond.
- 1.11 **Draft Policy DEV1 (Housing Delivery)** outlines a minimum housing requirement of 14,688 new dwellings over the 2017 to 2038 plan period which equates to an annualised requirement of 816 dwellings per annum. Land at Pool Lane and Warrington Road is proposed to be released from the Green Belt and allocated for residential development as part of this Updated Submission Draft of the Local Plan under **Policy OS4 –Lymm (Pool Lane/Warrington Road)**. Policy OS4 has been allocated for a minimum of 170 homes (see Appendix 2 for a red line boundary of the allocation OS4).



**2. GREEN BELT APPRAISAL**

- 2.1 This section assesses the contribution of that the land at Pool Lane and Warrington Road (Parcels A and B) makes towards the five Green Belt purposes and the impact that residential development would have on the Green Belt purposes.
- 2.2 The contribution that the parcels make to the Green Belt purposes has been assessed in accordance with the methodology set out in the Warrington Stage 1 Green Belt Assessment (October 2016) produced by Arup. This includes relying upon the same scoring system with parcels contribution scoring as <sup>1</sup>:

<b>Green Belt Contribution</b>	<b>Colour Code</b>
No Contribution	
Weak Contribution	
Moderate Contribution	
Strong Contribution	

- 2.3 In terms of the impact, the Council’s evidence has not specifically assessed the impact that the release of smaller parcels from the Green Belt will have on the strategic function of the Green Belt. As such, this appraisal assesses the potential impact of a residential development on the Green Belt purposes and any possible mitigation measures to reduce any impact on the Green Belt. In order to assess the impact, we used the following scoring system;

<b>Impact on Green Belt</b>	<b>Colour Code</b>
Low Impact	
Medium Impact	
High Impact	

- 2.4 A ‘high impact’ is considered to have the most effect on the strategic function of the Green Belt and the development of the parcel would be to the detriment of the Green Belt purposes. A ‘low impact’ demonstrates that the development of the parcel would have a limited/no impact on the Green Belt purpose. In this respect, clearly sites which would have a low or medium impact on the strategic function of the Green Belt would be the most appropriate to accommodate future development within the borough.
- 2.5 This Assessment is set out in Table 1.

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<sup>1</sup> The colour coding has been altered in comparison to the Council’s assessment. Pegasus Group have used the same colour coding system to reflect impact. Red refers to a strong contribution/high impact and green refers to weak contribution/low impact. This is to make sure there is no confusion and to ensure that this assessment is easy to read and understand.

**Table 1 –Contribution to & Impact on Green Belt - Land at Pool Lane/Warrington Road**

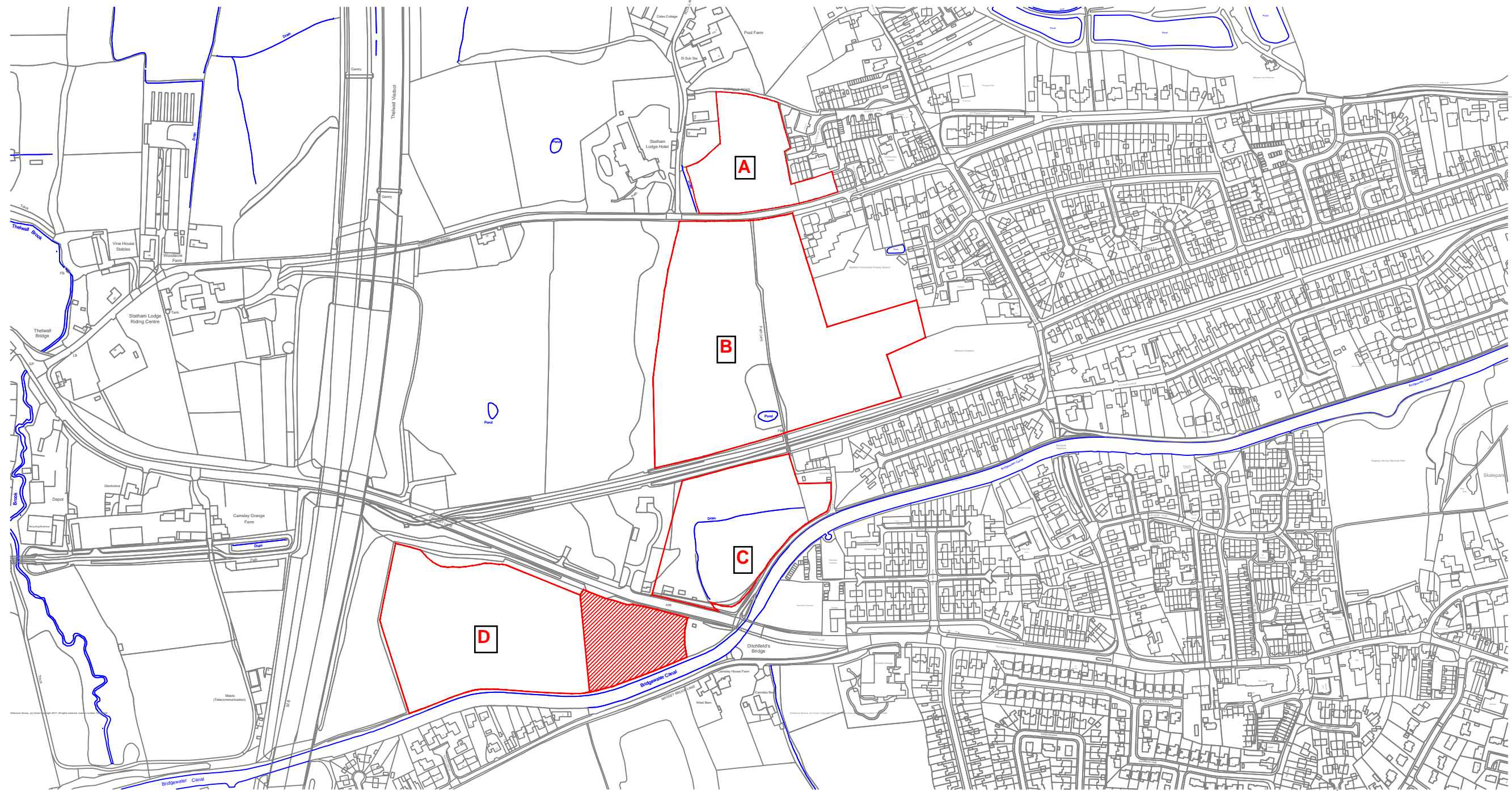
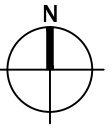
		<b>Contribution to Green Belt</b>		<b>Impact upon Green Belt</b>
<b>Purpose 1</b> - To check the unrestricted sprawl of large built up area	<b>No Contribution</b>	The site is detached from the main urban area (Warrington) and therefore makes no contribution to this purpose.	<b>Low Impact</b>	The site is well related to the settlement of Lymm however it is detached from the main urban area of Warrington and therefore the development would have no impact on the urban sprawl of the large built up area.
<b>Purpose 2</b> – To prevent neighbouring towns merging into one another	<b>Weak Contribution</b>	The site does not form an essential gap between the settlement of Lymm and the urban area of Warrington (Thelwall). Whilst the site may marginally reduce the actual gap between Warrington and Lymm, it would not reduce the perceived gap between the settlements and would not result in them merging. In addition, whilst separated from the village, Statham Lodge (to the west of parcel A) sits closer to the main urban area of Warrington which effectively is the point where separation is perceived from. The M6 and land to the west of the site will ensure that separation (both perceived and physical) would be retained.	<b>Low Impact</b>	In terms of Purpose 2, the development of site will have a low impact on this purpose. The development of the parcel would not reduce the perception of the existing gap between Lymm, the urban area of Warrington or any neighbouring settlement.
<b>Purpose 3</b> – To assist in safeguarding the countryside from encroachment	<b>Moderate Contribution</b>	Although there is no built form within the site, the existing urban area of Lymm is adjacent to the eastern boundary of Parcels A and B and the southern boundary of Parcel B. As well as this, there are two large dwellings adjacent to the western boundary of Parcel A. This adjacent built form has a significant impact on the setting of this parcel and as such, this parcel is considered to be more characteristic of the urban area as opposed to the open countryside. Along the parcel boundaries, there are dense hedgerows and trees which prevent long line views into the open countryside and reduce openness. Parcel B also benefits significant vegetation along the western and southern boundaries, with the southern boundary formed by the Transpennine Trail (formerly the Warrington and Stockport Railway) forming a durable boundary. There are no public footpaths in Parcel A however there is a public footpath located through Parcel B running north to south. Despite there being the opportunity to access the open countryside with this parcel, we consider overall the parcels to have a moderate contribution to this purpose.	<b>Medium Impact</b>	The development of this site would result in encroachment to the open countryside owing to the lack of built development however the effect of this would be limited, acknowledging the urbanising effects of the dwellings and hotel to the west of Parcel A between the existing urban area and the wider open countryside. Parcel B also has strong durable boundaries to the north and south, with the latter forming the Transpennine Trail (former Warrington & Stockport Railway), along with a strong vegetation buffer on its western boundary, which could be further strengthened through additional planting. Although there is access to the open countryside within Parcel B through an existing Public Right of Way (PRoW), there is the opportunity as part of the development of these parcels to further enhance this access to the countryside and provide additional opportunities for access and recreation. There is no access to the open countryside within Parcel A although a PRoW runs on the northern boundary providing the opportunity to improve access to the open countryside by delivering a potential pedestrian link through the site. Given this, the development of the site is considered to have a medium impact on this Green Belt purpose noting the moderate contribution that the site makes to this purpose. However, any development has the potential to create new and enhanced durable boundaries that would prevent further encroachment into the Green Belt and wider countryside.

		<b>Contribution to Green Belt</b>		<b>Impact upon Green Belt</b>
<b>Purpose 4 –</b> To preserve the setting and special character of historic towns	<b>No Contribution</b>	This parcel makes no contribution to this purpose. Although Lymm is considered as an historic town within the Green Belt Assessment, the site is not well related to the historic core with the site located approximately 640m from Lymm Conservation Area, and therefore well beyond the 250m buffer area referred to in the Green Belt Assessment. In addition, the site does not cross an important viewpoint of the Parish Church. As such, this site makes no contribution towards this purpose.	<b>Low Impact</b>	Although Lymm is designated as a historic town, the site is not well related to the historic core of the Conservation Area and does not cross viewpoints from designated heritage assets. Therefore, the site would have a low impact upon this purpose.
<b>Purpose 5 –</b> To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	<b>Moderate Contribution</b>	Although these parcels are considered to make a moderate contribution to this purpose, this is the same for all Green Belt sites noting the need for Green Belt release to accommodate the borough’s future development requirements.	<b>Low Impact</b>	As all Green Belt parcels around Lymm and the wider borough are considered to have the same contribution to this purpose and owing to the lack of land within the existing urban area to meet the borough’s development needs, the development of this site will have a low impact on this purpose.
<b>Overall Contribution Impact on Strategic Function of the GB</b>	<b>Weak Contribution</b>	This site is considered to make no contribution to two of the Green Belt purposes, a weak contribution to one Green Belt purpose and a moderate contribution to the two remaining Green Belt purposes. As such the site makes a weak overall contribution to the strategic function of the Green Belt.	<b>Low Impact</b>	The development of the site would have a low impact on the strategic function of the Green Belt, the impact of which could be limited through the proposed planting along the less durable western boundary of the site (Parcel B) and the opportunity to protect and enhance access to the open countryside.

### 3. CONCLUSIONS

- 3.1 As described in the assessment, this site makes a **weak contribution** to the strategic function of Green Belt. The site is detached from the main urban area of Warrington and does not contribute towards preventing the sprawl of the large built up area of Warrington. In terms of preventing the coalescence of settlements, similarly the site makes limited contribution to this purpose and would not result in the merger of Lymm with Warrington or any other settlements, having no impact on the perception of separation between the two areas.
- 3.2 Although there is no existing built form within the parcels, the parcels are located immediately adjacent to the existing settlement edge of Lymm and are well related to this urban area. This urban backdrop has a significant impact on the countryside setting of these parcels. The parcels are predominantly bound by strong definable/defensible boundaries. There are limited long line views into the open countryside given the dense vegetation and hedgerows which are located on the site's boundaries.
- 3.3 Long term defensible Green Belt boundaries can be established in the event that the site is developed. Although the existing western and southern boundaries of Parcel B are considered to be definable and defensible, these boundaries could be strengthened to create a stronger and more durable boundary to prevent future encroachment into the open countryside and urban sprawl. These boundaries could be bolstered, strengthened and enhanced to establish long term Green Belt boundaries. They would also provide new woodland and recreational routes to enhance biodiversity and access to the open countryside.
- 3.4 Noting this, it is considered that the development of this site for residential uses would have a **low impact** on the strategic function of the Green Belt and therefore represents an appropriate site to accommodate housing development to help meet the Borough's and Lymm's development needs.

**APPENDIX 1 - SITE LOCATION/LAND OWNERSHIP PLAN**




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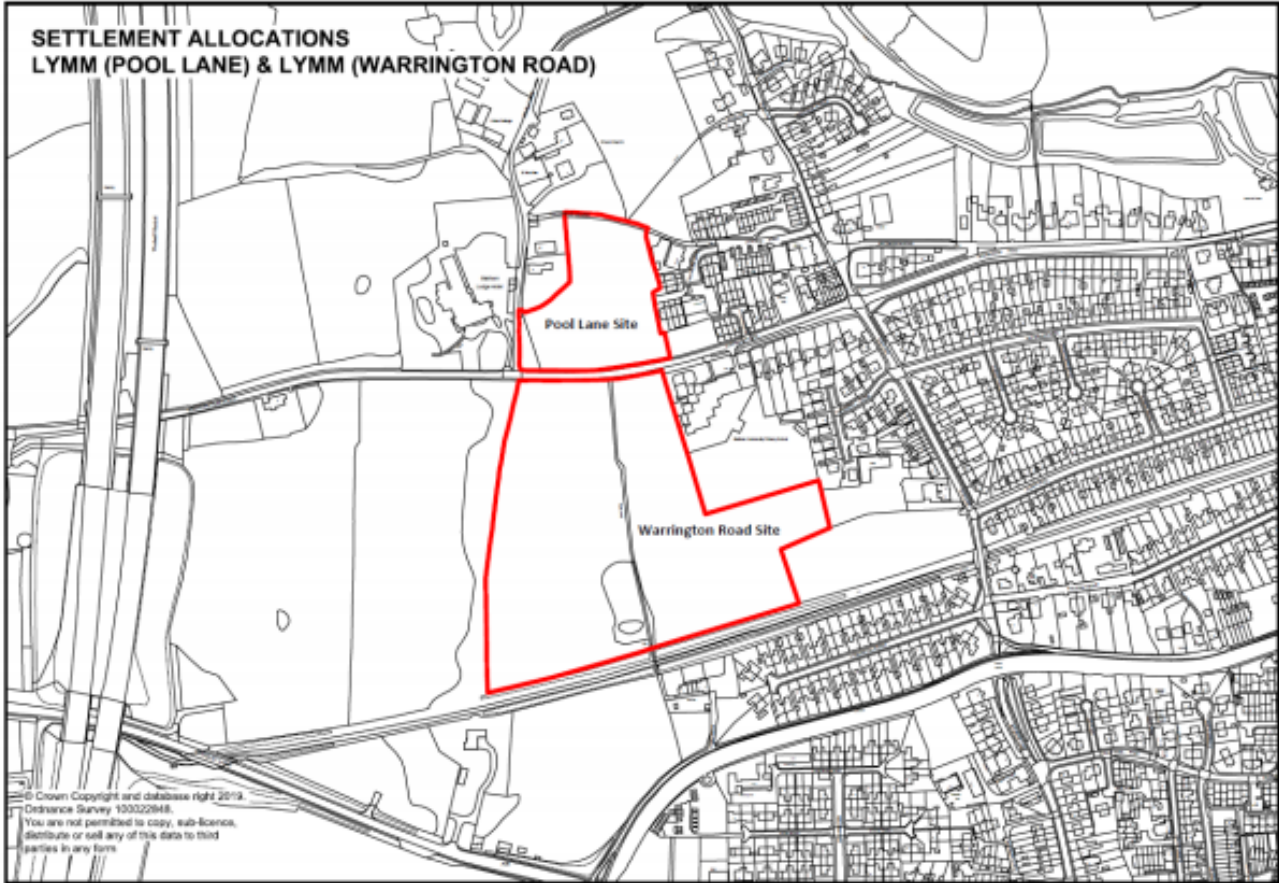
E	27.02.19	JAL	Parcel C boundary amended to match 2 titles plans
D	02.01.19	JAL	boundary adj. to 18-31 Crossland Mews further amended
C	29.11.18	JAL	boundary to parcel C amended/ indicative line to Parcel D exc. possessory to illustrate new eastern boundary
B	15.11.18	JAL	boundary adj. to 18-31 Crossland Mews amended
A	17.10.18	JAL	title info received and overlaid - amends to parcels a,b & d

Rev	Date	By	Revision notes
<b>Status</b>			
<b>Location Plan</b>			

<b>Project</b>	<b>Lymm, Camsley Lane</b>
<b>Title</b>	<b>Location Plan</b>

<b>Drawn by</b>	<b>James Tait</b>	<b>Issue date</b>	<b>19.12.17</b>
<b>Title checked by</b>	<b>JAL</b>	<b>Title checked date</b>	<b>17.10.18</b>
<b>Highways checked by</b>	<b>JAL</b>	<b>Highways checked date</b>	<b>17.10.18</b>
<b>Topo checked by</b>	<b>JAL</b>	<b>Topo checked date</b>	<b>17.10.18</b>
<b>Scale(s)</b>	<b>1:5000 @ A3</b>		
<b>Drawing No</b>	<b>2017-138-101-E</b>		

**APPENDIX 2 – PLAN TO SHOW DRAFT ALLOCATION**



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## **Appendix 2: Land off Abbey Close, Croft - Pegasus Group Green Belt Report**





**WARRINGTON UPDATED PROPOSED SUBMISSION  
VERSION LOCAL PLAN 2017-2038 CONSULTATION**

**GREEN BELT ASSESSMENT**

**LAND TO THE EAST OF ABBEY CLOSE, CROFT**

**GLADMAN DEVELOPMENTS LTD**

Date: November 2021

[Redacted]

Pegasus Group

[Redacted]

[Redacted]

[Redacted]

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

[Redacted]

[Redacted]

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## **1. INTRODUCTION**

- 1.1 This Green Belt Assessment has been prepared on behalf of Gladman Developments Ltd (Gladman) in respect of their land interests in Croft. Gladman are in control of one field parcel to the east of Abbey Close which measures approximately 2.69 hectares (see Appendix 1).
- 1.2 This assessment sets out the relevant national and local planning policy before going on to assess the contribution that the site makes, and impact that the development of the parcel would have on the five purposes of Green Belt.

### **National Planning Policy Green Belt Considerations**

- 1.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The document was initially published in March 2012 and since revised in July 2018, February 2019 and July 2021. The Updated Submission Version of the Warrington Local Plan (2017-2038) was published for public consultation in September 2021. As such the Local Plan will be considered by the Inspector under NPPF (2021).
- 1.4 Chapter 13; Protecting Green Belt land of the NPPF sets out the importance of the Green Belt. Paragraph 137 advises that the essential characteristics of Green Belt are their openness and their permanence. Paragraph 138 confirms that the five purposes of the Green Belt are:
- 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.
- 1.5 Paragraph 140 of the NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances which have been 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.

### **Green Belt Around Warrington & Local Planning Policy**

- 1.6 The Green Belt around Warrington was first formally designated in the Cheshire Structure Plan 1977 (adopted 1979) with the Green Belt boundary drawn around the existing settlements and the areas outside of the New Town Designation. Later alterations of the Structure Plan in 1985 and 1999 did not change the extent of the Green Belt boundary. Whilst minor amendments to the Green Belt boundary were made through the 1998 Unitary Development Plan, the Local Plan Core Strategy

(2014) did not alter the Green Belt boundaries and therefore the current Green Belt boundaries are still based upon the original designation some 40 years ago.

- 1.7 The development plan comprises of the adopted Warrington Local Plan Core Strategy (July 2014). Following its adoption, a legal challenge was made with respect to the housing policies contained within the Warrington Local Plan Core Strategy with the Plan's housing target and reference to the delivery of new homes at the Omega strategic development site being overturned.
- 1.8 Warrington Borough Council (WBC) are in the process of preparing their Local Plan. The Submission Version of the emerging Local Plan was published in April 2019. Following this, an updated Submission Version of the emerging Local Plan (2021-2038) was published in September 2021 and is being consulted on until November 2021.
- 1.9 The emerging Local Plan is supported by a Green Belt assessment prepared in October 2016 (by Arup) to assist WBC in considering whether 'exceptional circumstances' exist to justify altering Green Belt boundaries through the Local Plan, as well as an additional Green Belt Site Selection: Implications of Green Belt Release document that has been prepared for the current updated Proposed Submission Version of the Local Plan. This document provides a comprehensive review of the options for the Plan's spatial strategy.
- 1.10 The Updated Proposed Submission Version of the Local Plan confirms that the primary exceptional circumstance relating to the need for Green Belt release is to ensure that there is sufficient land to meet the borough's development needs. It is clear within the available evidence that there is insufficient land within Warrington's existing urban area and greenfield sites to meet its housing and employment needs going forward. As stated in the Updated Submission Version of the Local Plan, the existing urban area can accommodate around 11,785 new homes. This means there is still the requirement to provide land for around 4,400 homes through the release of Green Belt land to accommodate the development needs throughout the plan period and beyond.
- 1.11 **Draft Policy DEV1 (Housing Delivery)** outlines a minimum housing requirement of 14,688 new dwellings over the 2017 to 2038 plan period which equates to an annualised requirement of 816 dwellings per annum. In Croft, draft **Policy OS1** – Croft proposes to deliver a minimum of 75 homes. As shown in the red line plan at Appendix 2, this land is located immediately north of this site at Abbey Close.

## 2. GREEN BELT APPRAISAL

2.1 This section assesses the contribution of that the land at Abbey Close makes towards the five Green Belt purposes and the impact that residential development would have on the Green Belt purposes.

2.2 The contribution that the parcel makes to the Green Belt purposes has been assessed in accordance with the methodology set out in the Warrington Stage 1 Green Belt Assessment (October 2016) produced by Arup. This includes relying upon the same scoring system with parcels contribution scoring as <sup>1</sup>:

<b>Green Belt Contribution</b>	<b>Colour Code</b>
No Contribution	Grey
Weak Contribution	Light Green
Moderate Contribution	Yellow
Strong Contribution	Red

2.3 In terms of the impact, the Council's evidence has not specifically assessed the impact that the release of smaller parcels from the Green Belt will have on the strategic function of the Green Belt. As such, this appraisal assesses the potential impact of a residential development on the Green Belt purposes and any possible mitigation measures to reduce any impact on the Green Belt. In order to assess the impact, we used the following scoring system;

<b>Impact on Green Belt</b>	<b>Colour Code</b>
Low Impact	Light Green
Medium Impact	Yellow
High Impact	Red

2.4 A 'high impact' is considered to have the most effect on the strategic function of the Green Belt and the development of the parcel would be to the detriment of the Green Belt purposes. A 'low impact' demonstrates that the development of the parcel would have a limited/no impact on the Green Belt purpose. In this respect, clearly sites which would have a low or medium impact on the strategic function of the Green Belt would be the most appropriate to accommodate future development within the borough.

2.5 This Assessment is set out in Table 1.

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<sup>1</sup> The colour coding has been altered in comparison to the Council's assessment. Pegasus Group have used the same colour coding system to reflect impact. Red refers to a strong contribution/high impact and green refers to weak contribution/low impact. This is to make sure there is no confusion and to ensure that this assessment is easy to read and understand.

**Table 1 – Contribution to & Impact on Green Belt -land at Pool Lane/Warrington Road -Land at east of Abbey Close, Croft**

		Contribution to Green Belt		Impact upon Green Belt
<b>Purpose 1</b> - To check the unrestricted sprawl of large built up area	<b>No Contribution</b>	This site is detached from the main urban area (Warrington) and therefore it makes no contribution to this purpose.	<b>Low Impact</b>	The site is detached from the main urban area of Warrington although well related to the settlement of Croft. As such, the development would have no impact on the urban sprawl of the large built up area whilst the M6, the M62 and the surrounding countryside will further restrict any sprawl from the main urban area of Warrington. As such, the development of this parcel would have a low impact on this purpose.
<b>Purpose 2</b> – To prevent neighbouring towns merging into one another	<b>No Contribution</b>	<p>This site makes no contribution to this purpose. Whilst the site sits between the settlements of Warrington and Culcheth, with Lowton further north, the existing settlement boundaries of Croft are located closer to these settlements than the site and as such the site does not affect the actual or perceived separation of the settlements.</p> <p>Culcheth is around 1.78km to the north east of the site whilst the existing settlement boundary of Croft along Mustard Lane is around 1.69km from Culcheth. Birchwood (Warrington) is around 1.3km from the site whilst the existing settlement boundary along New Lane is around 890m from Birchwood. Lowton is located 3.12km from the site compared to the closest part of the settlement boundary (along Health Lane) which is 2.75m from Lowton.</p>	<b>Low Impact</b>	The parcel is considered to have a low impact on this purpose. The closest towns are Culcheth to the north east and Birchwood to the south east. There is already existing development in between the site and these settlements and therefore the development of this parcel would have a low impact on the wider strategic function of the Green Belt in this respect.

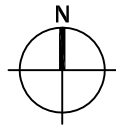
		Contribution to Green Belt		Impact upon Green Belt
<b>Purpose 3</b> – To assist in safeguarding the countryside from encroachment	<b>Moderate Contribution</b>	<p>The site is bounded to the south (part), west and north (part) by the existing settlement boundaries, with these boundaries being made up of the gardens of residential properties which are classed as non-durable boundaries within the appraisal definitions. Nevertheless, the northern boundary is made up a durable boundary feature in the form of a hedge lined made footpath with Heathcroft Stud beyond. The eastern boundary is a hedgerow which marks the edge of the field boundary. The site is therefore very well contained and whilst there are some longer open views towards the east these are limited by the strong northern and southern boundaries. There is currently no access within the parcel.</p> <p>There is a PRoW which runs along the northern boundary of the site but there are no opportunities to access the countryside within this site. The site is well related to the existing settlement of Croft and this urban area is visible from this site which has an impact on the character of the site.</p>	<b>Medium Impact</b>	The development of this parcel would have a medium impact on the overall strategic function of the Green Belt. Whilst the parcel has some non-durable boundaries and is free from built development, it is well enclosed, with the opportunity to strengthen the enclosure on the eastern boundary, thereby limiting the impact that any development would have on the wider countryside. The land to the north of the site is a draft allocation in the emerging Local Plan. Once this allocation is brought forward for development, this parcel would become very enclosed by built form, and effectively an in-fill site. The role that the site plays against this function would be further reduced.
<b>Purpose 4</b> – To preserve the setting and special character of historic towns	<b>No Contribution</b>	This site makes no contribution to this purpose as Croft is not identified as an historic town and is not located close to any such town nor does it cross an important viewpoint of the Parish Church.	<b>Low Impact</b>	As Croft is not a historic town and the site is located away from any such town, including any viewpoints of the Parish Church of St Elphins there would be no impact on this purpose.
<b>Purpose 5</b> – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	<b>Moderate Contribution</b>	Although this parcel is considered to make a moderate contribution to this purpose, this is the same for all Green Belt sites noting the need for Green Belt release to accommodate the borough's future development requirements.	<b>Low Impact</b>	As all Green Belt parcels around Croft and the wider Borough are considered to have the same contribution to this purpose and owing to the lack of land within the existing urban area to meet the borough's development needs, the development of this site will have a low impact on this purpose.
<b>Overall Contribution Impact on Strategic Function of the GB</b>	<b>Weak Contribution</b>	This site is considered to make no contribution to three of the Green Belt purposes and a moderate contribution to the two remaining Green Belt purposes. As such the site makes a weak overall contribution to the strategic function of the Green Belt.	<b>Low Impact</b>	The development of the site would have a low impact on the strategic function of the Green Belt, the impact of which would could be further limited through planting along the less durable eastern boundary of the site. As noted above, the impact would be reduced given that draft allocation OS6 is located immediately north of this site.

### 3. CONCLUSIONS

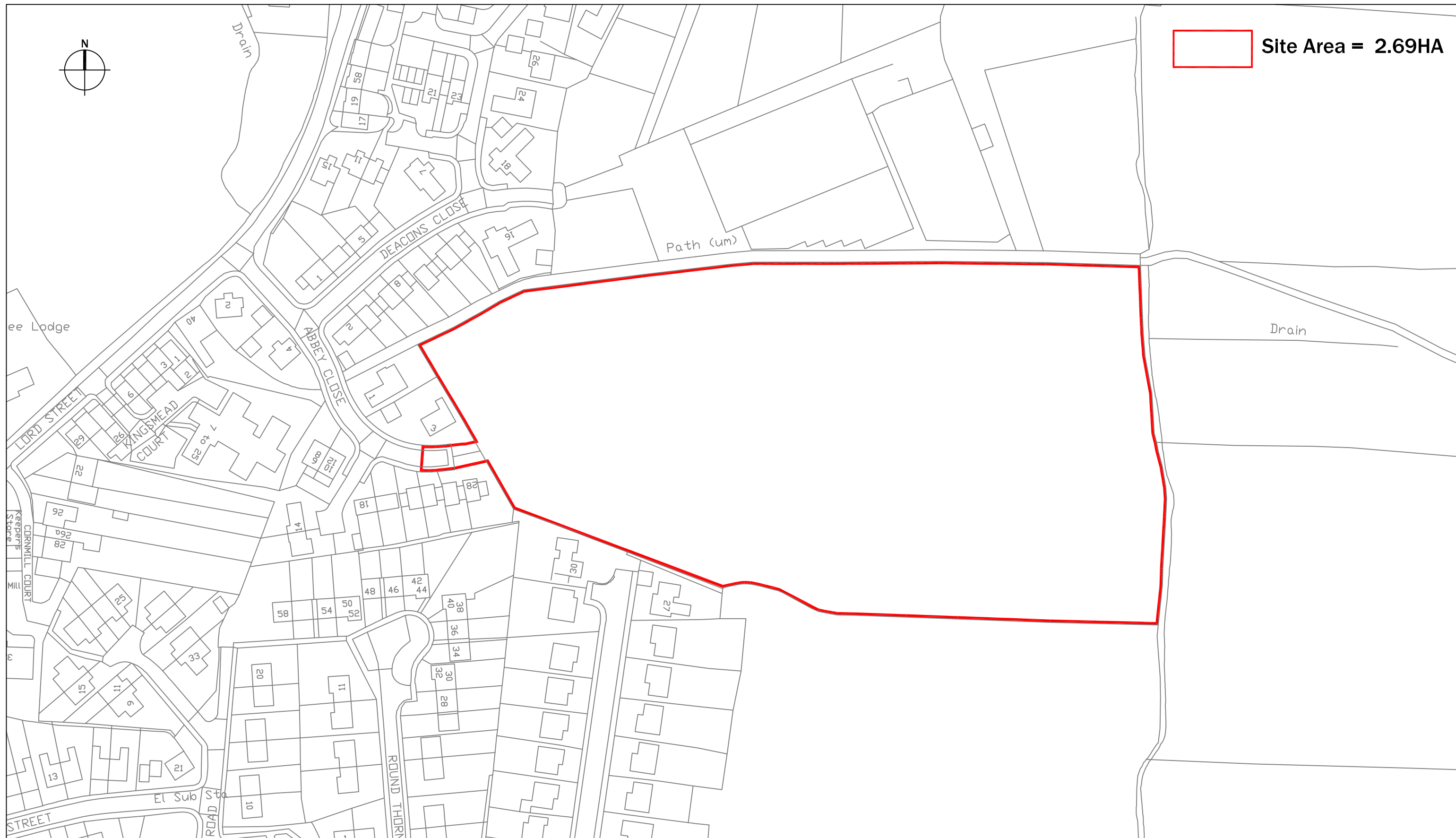
- 3.1 As described in the assessment, this site makes a **weak contribution** to the strategic function of the Green Belt. The site is detached from the main urban area of Warrington and therefore would make no contribution to Purpose 1. The parcel is considered to be well enclosed and bound predominantly by strong definable boundaries. The development of this parcel would not reduce the existing gap between the neighbouring settlements of Culcheth or Warrington (Birchwood). Furthermore, there is existing development which extends further north, east and south of this site and therefore this parcel makes no contribution to Purpose 2. The dense wooded area adjacent to the southern boundary and the dense hedgerows/ trees along the site boundaries restrict open long line views into the open countryside. They also prevent encroachment into the wider open countryside beyond this parcel and could be strengthened through the development of the site. Although there is no built form within the parcel, the parcel is considered to be well related to the existing settlement of Croft.
- 3.2 In terms of the impact that the development of the site would have on the wider strategic function of the Green Belt, we consider that residential development would have a **low impact** and the site to be a suitable and appropriate option for development. Incorporating additional landscaping and hedgerows along the eastern boundary of the site will create a dense landscaped edge to the development and a strong durable boundary which would prevent future encroachment into the open countryside. This landscaped edge would reflect the adjacent countryside and bolster the existing trees and hedgerows.
- 3.3 This site is located immediately to the south of a draft allocation for residential development (Policy OS2 of the Submission draft of the emerging plan). This draft allocation to the north further encloses the site and would further diminish any contribution that the site may make to the five Green Belt purposes. As such, the development of the allocation to the north and this site would create a strong development line to the east of the settlement which would ensure that any development on this site would result in further encroachment into the open countryside.
- 3.4 In conclusion, the site is considered to make a suitable and logical extension to the settlement of Croft to accommodate future housing for the borough. The site makes a weak contribution to Green Belt purposes and its development would have a low impact on the wider strategic function of the Green Belt.



**APPENDIX 1 – SITE LOCATION/LAND OWNERSHIP PLAN**



Site Area = 2.69HA



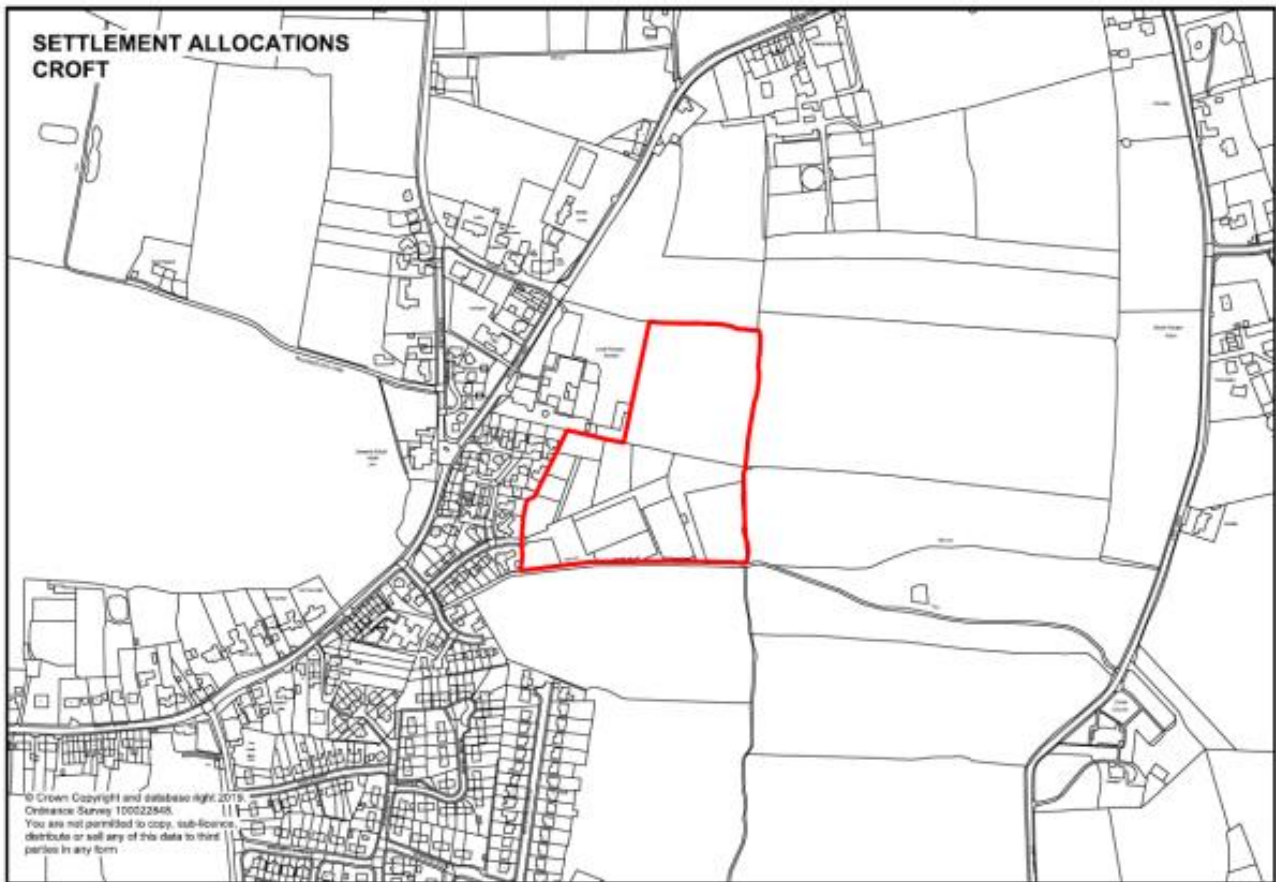

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Rev	Date	By	Revision notes
A	20-04-18	TP	Red line boundary amended following title registration
Status			<b>PRELIMINARY</b>

Project	<b>CROFT, ABBEY CLOSE</b>
Title	<b>LOCATION PLAN</b>

Drawn by <b>Tim Poupard</b>	Issue date <b>12 October 2017</b>
Title checked by <b>Tim Poupard</b>	Title checked date <b>20 April 2018</b>
Highways checked by <b>Tim Poupard</b>	Highways checked date <b>20 April 2018</b>
Topo checked by <b>Tim Poupard</b>	Topo checked date <b>20 April 2018</b>
Scale(s) <b>1:1250@A3</b>	
Drawing No <b>2017-099-LP01-REV-A</b>	

**APPENDIX 2 – PLAN TO SHOW DRAFT ALLOCATION**



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**Appendix 3: Land North and South of Camsley Lane, Lymm - Pegasus  
Group Green Belt Report**



**WARRINGTON UPDATED PROPOSED SUBMISSION  
VERSION LOCAL PLAN 2017-2038 CONSULTATION**

**GREEN BELT ASSESSMENT**

**LAND AT CAMSLEY LANE, LYMM**

**GLADMAN DEVELOPMENTS LTD**

Date: November 2021

[Redacted]

Pegasus Group

[Redacted]

[Redacted]

[Redacted]

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

[Redacted]

[Redacted]

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**3. CONCLUSIONS ..... 7**

**APPENDIX 1 – SITE LOCATION/LAND OWNERSHIP PLAN ..... 8**



## **1. INTRODUCTION**

1.1 This Green Belt Assessment has been prepared on behalf of Gladman Developments Ltd (Gladman) in respect of their land interests at Camsley Lane, Lymm. Gladman are in control of 13.88 hectares, made up of four parcels (A-D) to the west of Lymm (see Appendix 1). This Green Belt assessment relates specifically to Parcels C and D. Parcel C is known as land north of Camsley Lane and Parcel D is known as land south of Camsley Lane.

1.2 This assessment sets out the relevant national and local planning policy before going on to assess the contribution that the sites make and impact that the development of these parcels would have on the five purposes of Green Belt.

### **National Planning Policy Green Belt Considerations**

1.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The document was initially published in March 2012 and since revised in July 2018, February 2019 and July 2021. The updated Submission Version of the Warrington Local Plan (2017-2038) was published for public consultation in September 2021. As such the Local Plan will be considered by the Inspector under NPPF (2021).

1.4 Chapter 13; Protecting Green Belt land of the NPPF sets out the importance of the Green Belt. Paragraph 137 advises that the essential characteristics of Green Belt are their openness and their permanence. Paragraph 138 confirms that the five purposes of the Green Belt are:

- 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.

1.5 Paragraph 140 of the NPPF states that once established, Green Belt boundaries should only be altered in exceptional circumstances which have been 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.

### **Green Belt Around Warrington & Local Planning Policy**

1.6 The Green Belt around Warrington was first formally designated in the Cheshire Structure Plan 1977 (adopted 1979) with the Green Belt boundary drawn around the existing settlements and the areas outside of the New Town Designation. Later alterations of the Structure Plan in 1985 and

1999 did not change the extent of the Green Belt boundary. Whilst minor amendments to the Green Belt boundary were made through the 1998 Unitary Development Plan, the Local Plan Core Strategy (2014) did not alter the Green Belt boundaries and therefore the current Green Belt boundaries are still based upon the original designation some 40 years ago.

- 1.7 The development plan comprises of the adopted Warrington Local Plan Core Strategy (July 2014). Following its adoption, a legal challenge was made with respect to the housing policies contained within the Warrington Local Plan Core Strategy with the Plan's housing target and reference to the delivery of new homes at the Omega strategic development site being overturned.
- 1.8 Warrington Borough Council (WBC) are in the process of preparing their Local Plan. The Submission Version of the emerging Local Plan was published in April 2019. Following this, an updated Submission Version of the emerging Local Plan (2021-2038) was published in September 2021 and is being consulted on until November 2021.
- 1.9 The emerging Local Plan is supported by a Green Belt assessment prepared in October 2016 (by Arup) to assist WBC in considering whether 'exceptional circumstances' exist to justify altering Green Belt boundaries through the Local Plan, as well as an additional Green Belt Site Selection: Implications of Green Belt Release document that has been prepared for the current updated Proposed Submission Version of the Local Plan. This document provides a review of the options for the Plan's spatial strategy.
- 1.10 The Updated Proposed Submission Version of the Local Plan confirms that the primary exceptional circumstance relating to the need for Green Belt release is to ensure that there is sufficient land to meet the borough's development needs. It is clear within the available evidence that there is insufficient land within Warrington's existing urban area and greenfield sites to meet its housing and employment needs going forward. As stated in the Updated Submission Version of the Local Plan, the existing urban area can accommodate around 11,785 new homes. This means there is still the requirement to provide land for around 4,400 homes through the release of Green Belt land to accommodate the development needs throughout the plan period and beyond.
- 1.11 **Draft Policy DEV1 (Housing Delivery)** outlines a minimum housing requirement of 14,688 new dwellings over the 2017 to 2038 plan period which equates to an annualised requirement of 816 dwellings per annum. In Lymm, 306 homes have been allocated to be delivered over three sites which include;
- Policy OS4 Pool Lane/Warrington (170 homes); and
  - Policy OS5 Rushgreen Road (136 homes).



**2. GREEN BELT APPRAISAL**

- 2.1 This section assesses the contribution that the land at Camsley Lane (Parcels C and D) makes towards the five Green Belt purposes and the impact that residential development would have on the Green Belt purposes.
- 2.2 The contribution that the Parcels make to the Green Belt purposes has been assessed in accordance with the methodology set out in the Warrington Stage 1 Green Belt Assessment (October 2016), produced by Arup. This includes relying upon the same scoring system with parcels contribution scoring as <sup>1</sup>;

<b>Green Belt Contribution</b>	<b>Colour Code</b>
No Contribution	
Weak Contribution	
Moderate Contribution	
Strong Contribution	

- 2.3 In terms of the impact, the Council’s evidence has not specifically assessed the impact that the release of smaller parcels from the Green Belt will have on the strategic function of the Green Belt. As such, this appraisal assesses the potential impact of a residential development on the Green Belt purposes and any possible mitigation measures to reduce any impact on the Green Belt. In order to assess the impact, we used the following scoring system;

<b>Impact on Green Belt</b>	<b>Colour Code</b>
Low Impact	
Medium Impact	
High Impact	

- 2.4 A ‘high impact’ is considered to have the most effect on the strategic function of the Green Belt and the development of the parcel would be to the detriment of the Green Belt purposes. A ‘low impact’ demonstrates that the development of the parcel would have a limited/no impact on the Green Belt purpose. In this respect, clearly sites which would have a low or medium impact on the strategic function of the Green Belt would be the most appropriate to accommodate future development within the borough.
- 2.5 This Assessment is set out in Table 1.

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<sup>1</sup> The colour coding has been altered in comparison to the Council’s assessment. Pegasus Group have used the same colour coding system to reflect impact. Red refers to a strong contribution/high impact and green refers to weak contribution/low impact. This is to make sure there is no confusion and to ensure that this assessment is easy to read and understand.

**Table 1 –Contribution to and Impact on Green Belt - Land at Camsley Lane**

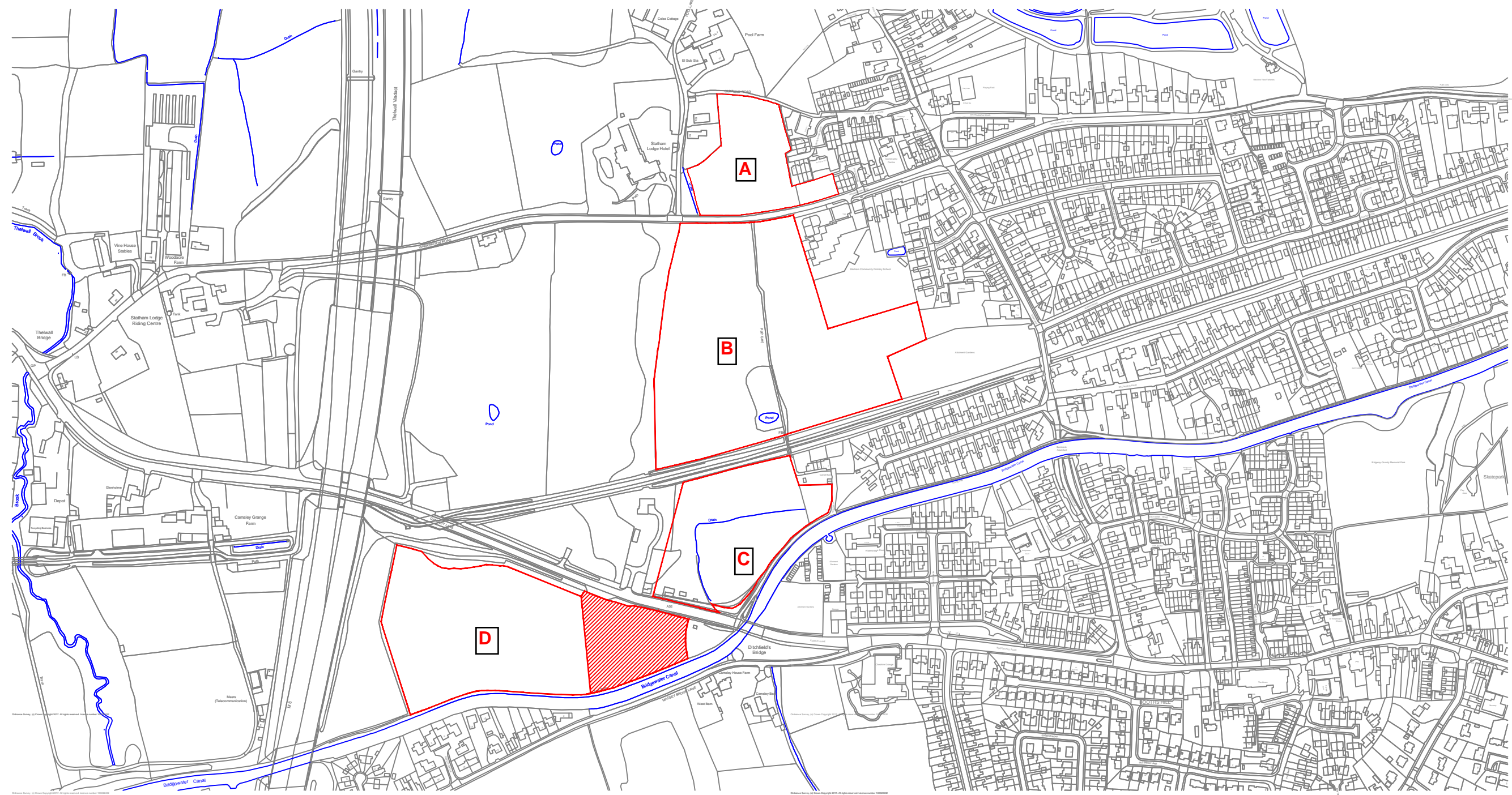
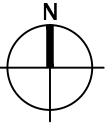
		Contribution to Green Belt		Impact upon Green Belt
<b>Purpose 1</b> - To check the unrestricted sprawl of large built up area	<b>No Contribution</b>	The site is detached from the main urban area (Warrington) and therefore makes no contribution to this purpose.	<b>Low Impact</b>	The site is well related to the settlement of Lymm however it is detached from the main urban area of Warrington and therefore the development would have no impact on the urban sprawl of the large built up area.
<b>Purpose 2</b> – To prevent neighbouring towns merging into one another	<b>Weak Contribution</b>	The site forms a less essential gap between Lymm and the Warrington urban area. Although the development of Parcel D would reduce the actual gap between Lymm and the main urban area of Warrington, the perceived gap would be retained between the towns due to the presence of the M6. The M6 is a strong, durable and defensible boundary which would prevent the merging of these two areas.	<b>Low Impact</b>	Although the development of Parcel D would reduce the actual gap between Lymm and Warrington, the perception of separation would be unaffected with the M6 helping to form a permanent and strong separation between the two settlements even if the site were to come forward for residential development. Overall the development of this site would have a low impact on the overall strategic function of the Green Belt.
<b>Purpose 3</b> – To assist in safeguarding the countryside from encroachment	<b>Moderate Contribution</b>	<p>Whilst both parcels are undeveloped and have a predominantly rural character, Parcels C and D have different characteristics in respect of this purpose.</p> <p>Parcel C is located adjacent to the existing urban edge to the north east, with strong durable boundaries to the north, east and south in the form of the Transpennine Trail, the Bridgewater Canal and Camsley Lane. A large residential property forms the strong western boundary to this parcel. As such this site is well enclosed with very limited open views into the wider open countryside.</p> <p>Parcel D is slightly detached from the existing urban area, although there are properties immediately south of the canal. This parcel is bound by strong durable boundaries of Camsley Lane (north), Bridgewater Canal (east and south) and the steep embankment of the M6 (west), which would prevent further encroachment into the countryside.</p> <p>There is no built form within the parcels however there is visible built form surrounding the parcels. Added to this, there is no existing access through the parcels or the opportunity for residents to enjoy the countryside in this location.</p> <p>As such the site is only considered to serve a moderate contribution to this Green Belt purpose.</p>	<b>Medium Impact</b>	<p>The development of this site would result in encroachment into the open countryside owing to the lack of built development within either parcel however this would have a limited impact, acknowledging the urbanising effects of the surrounding development and the strong durable boundaries which surround the parcels. These boundaries will be further strengthened through appropriate planting and landscaping which will also help to screen the proposed development. This would also help to prevent further encroachment into the countryside.</p> <p>The site does not currently provide any opportunity for access to the open countryside and the development of the site would help to improve accessibility in the wider open countryside.</p>

		Contribution to Green Belt		Impact upon Green Belt
<b>Purpose 4 –</b> To preserve the setting and special character of historic towns	<b>No Contribution</b>	This parcel makes no contribution to this purpose. Although Lymm is considered as an historic town within the Green Belt Assessment, the site is not well related to the historic core with the site located approximately 700m from Lymm Conservation Area, and therefore well beyond the 250m buffer area referred to in the Green Belt Assessment. In addition, the site does not cross an important viewpoint of the Parish Church. As such, this site makes no contribution towards this purpose.	<b>Low Impact</b>	Although Lymm is designated as a historic town, the site is not located close or well related to the historic core and the parcels do not cross viewpoints from designated heritage assets. Therefore, these parcels would have a low impact upon this purpose.
<b>Purpose 5 –</b> To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	<b>Moderate Contribution</b>	Although these parcels are considered to make a moderate contribution to this purpose, this is the same for all Green Belt sites noting the need for Green Belt release to accommodate the borough's future development requirements.	<b>Low Impact</b>	As all Green Belt parcels around Lymm and the wider borough are considered to have the same contribution to this purpose and owing to the lack of land within the existing urban area to meet the borough's development needs, the development of this site will have a low impact on this purpose.
<b>Overall Contribution Impact on Strategic Function of the GB</b>	<b>Weak Contribution</b>	This site is considered to make no contribution to two of the Green Belt purposes, a weak contribution to one Green Belt purpose and a moderate contribution to the two remaining Green Belt purposes. As such the site makes a weak overall contribution to the strategic function of the Green Belt.	<b>Low Impact</b>	The development of the site would have a low impact the strategic function of the Green Belt, the impact of which could be further limited through strengthening and enhancing the site's existing boundaries and the opportunity to enhance access to the open countryside in this area.

### 3. CONCLUSIONS

- 3.1 As described in the assessment, this site makes a **weak contribution** to the strategic function of the Green Belt. The site is detached from the main urban area of Warrington and does not make any contribution towards preventing the sprawl of the main built up area of Warrington. Added to this, the M6 forms the western boundary of Parcel D as well as a dense wooded area. This durable, permanent and strong boundary would prevent the sprawl of the urban areas of Lymm and Warrington area as well as preventing coalescence of these settlements. Although we do recognise that the development of the site would reduce the existing gap between Warrington and Lymm, the presence of this boundary would not reduce the perceived distance.
- 3.2 Although there is no existing built form within the site, it is located adjacent to the existing settlement edge of Lymm and Parcel D is bound by existing development beyond the canal to the south of the parcel. These urban areas are visible from these parcels which impact upon the setting and character of the countryside in this location. At present, these parcels are well contained and comprise of dense vegetation and trees within and around the parcel boundaries which prevent long line views into the open countryside.
- 3.3 In terms of the impact on the strategic function of the Green Belt, this would be low owing to the strong enclosure of both parcels and the lack of public access into the site. In addition, there is the opportunity improve to improve access to the open countryside through the development of these sites. Notably, Parcel C is proposed to be retained undeveloped and managed as an area for wildlife enhancements. A new recreational route is proposed within this Parcel which would enhance local residents access to the open countryside and provide links to the wider PRoW network. An additional play area is also proposed to be located within Parcel D, providing further recreational opportunities.
- 3.4 Given the **low impact** on the strategic function on the Green Belt, the site is considered to be appropriate to accommodate housing development to help meet the Borough's and Lymm's development needs.

**APPENDIX 1 – SITE LOCATION/LAND OWNERSHIP PLAN**




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E	27.02.19	JAL	Parcel C boundary amended to match 2 titles plans
D	02.01.19	JAL	boundary adj. to 18-31 Crossland Mews further amended
C	29.11.18	JAL	boundary to parcel C amended/ indicative line to Parcel D exc. possessory to illustrate new eastern boundary
B	15.11.18	JAL	boundary adj. to 18-31 Crossland Mews amended
A	17.10.18	JAL	title info received and overlaid - amends to parcels a,b & d

Rev	Date	By	Revision notes
<b>Status</b>			
<b>Location Plan</b>			

<b>Project</b>	<b>Lymm, Camsley Lane</b>
<b>Title</b>	<b>Location Plan</b>

<b>Drawn by</b>	<b>James Tait</b>	<b>Issue date</b>	<b>19.12.17</b>
<b>Title checked by</b>	<b>JAL</b>	<b>Title checked date</b>	<b>17.10.18</b>
<b>Highways checked by</b>	<b>JAL</b>	<b>Highways checked date</b>	<b>17.10.18</b>
<b>Topo checked by</b>	<b>JAL</b>	<b>Topo checked date</b>	<b>17.10.18</b>
<b>Scale(s)</b>	<b>1:5000 @ A3</b>		
<b>Drawing No</b>	<b>2017-138-101-E</b>		

