

Paper 4:

Outlying Settlements: Site Allocations

Representations to the Warrington Proposed
Updated Submission Version Local Plan

Peel L&P Holdings (UK) Ltd

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1. Introduction

1.1 This Paper forms part of a suite of documents which together comprise the representations of Peel L&P Holdings (UK) Ltd (“Peel”) to the Warrington Proposed Updated Submission Version Local Plan (“PUSLP”).

Peel’s Representations

1.2 Peel’s representations are contained chiefly within a number of separate but related ‘strategic papers’. Paper 1 provides a collated overview of Peel’s representations to the PUSLP and introduces three further papers and supporting materials. This Paper (Paper 4) should be read in conjunction with the remainder of Peel’s submission and particularly Paper 1.

1.3 The full list of papers are as follows:

- **Paper 1: Main representation** (this Paper) – provides an overview of Peel’s representations and captures the key points relating to the overall soundness of the PSLP 2021, including drawing on evidence presented in other papers
- **Paper 2: The housing requirement** – provides a critique of the PSLP 2021 housing requirement
- **Paper 3: the housing supply** – provides a critique of the identified housing land supply upon which the PSLP is reliant to meet the proposed housing requirement
- **Paper 4: The Outlying Settlements** – presents an assessment of the Council’s approach to the appraisal of options for accommodating the development needs of the Outlying Settlements and the selection of sites for allocation

1.4 Peel’s submission to the PUSLP also includes a series of Development Prospectuses and a full suite of supporting technical reports provided in respect of its land interests in the Outlying Settlements of the Borough. This material demonstrates how these sites could be delivered for residential development in a sustainable manner over the plan period (and in some cases making provision for delivering development beyond the current plan period), securing significant local benefits in the process.

1.5 The Development Prospectuses and associated technical work supplement the analysis presented in Papers 1 to 3 and demonstrate that, in the context of the issues of soundness revealed, the subject sites would represent sustainable development opportunities and that their allocation for development would go some way to correcting the soundness issues raised within Peel’s representations.

This Paper

1.6 Paper 4 is concerned specifically with the sites which the PUSLP proposes for allocation for development over the plan period within the named Outlying Settlements of the Borough. It considers the question of whether these represent the most sustainable

options and thus whether the PUSLP reflects an appropriate strategy, when considered against reasonable alternatives and is therefore justified.

- 1.7 This paper therefore provides comments on the sites selected in the context of the overall plan strategy as advanced by the Council and assesses these against the proposals put forward by Peel as potential site allocations. It demonstrates that when considered on a like-for-like basis, the sites put forward by Peel for allocation within the Outlying Settlements would be inherently more sustainable than those proposed by the Council through the PUSLP.
- 1.8 Added to this, this Paper sets out details of land which should be released from the Green Belt and designated as safeguarded within the Local Plan to meet development needs beyond the plan period, reflecting a need for such designations, including in the Outlying Settlements. As outlined in Paper 1 there is a need for the designation of Safeguarded Land to meet development needs beyond 2038 and in order that the Local Plan can meet the requirements of National Planning Policy Framework ('the Framework') in this regard.
- 1.9 Each settlement within which Peel has land interests is considered in turn within the following chapters.

2. Consideration of Green Belt contribution in the site assessment process

- 2.1 As a general comment, which applies across all settlements and sites, it is apparent that the Council's Green Belt evidence base has not been appropriately applied in the appraisal of sites considered for allocation. This evidence includes the 2016 Green Belt Assessment, the 2017 Green Belt Assessment Addendum, the 2017 Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) and the 2018 Green Belt Assessment (Additional Site Assessment – settlements). Collectively these reports identify the Green Belt contribution made by General Areas of Green Belt, smaller Green Belt parcels and finally by individual sites considered for allocation.
- 2.2 This evidence is unchanged and remains part of the overall evidence base. A further assessment has been undertaken as part of the evidence base for the PUSLP (the Green Belt Site Selection Implications of Green Belt Release August 2021). This provides an assessment of the implications resulting from the proposed allocations in the PUSLP. It does not therefore assess any sites excluded as a result of the preceding assessment process.
- 2.3 As part of the appraisal of sites considered for allocation, the Council has determined that all potential sites which are deemed to make a strong overall Green Belt contribution (based on the above evidence base) should be discounted from the site selection process, notwithstanding their potential suitability when other sustainability measures are factored into the process. This is confirmed within paragraph 3.2 of the Council's Development Options and Site Assessment Technical Report (September 2021¹). This is flawed for a number of reasons.
- 2.4 The Green Belt appraisal assesses the contributions of sites in relation to each of the Green Belts and grades it either:
- Strong
 - Moderate
 - Weak

Due to the manner in which the Council's Green Belt appraisal (which is not accepted to be a fair assessment in a number of respects) is undertaken, a situation can arise whereby a site under consideration for allocation makes a one-step greater contribution against one of the five purposes of the Green Belt (e.g. strong rather than moderate) than another site but the same contribution in respect of all other purposes, yet its overall contribution can be two steps greater (e.g. strong versus weak). This particularly arises in cases where sites are deemed to make a strong rather than moderate contribution against Green Belt Purpose 3 (to assist in safeguarding the countryside from encroachment) but the same in respect of all other purposes. This is

¹ And paragraph 4.2 of the 2019 version.

the case with sites 1527 and 1528 (both in Lymm, graded weak and strong respectively). In some cases, professional judgement is stated to have been applied but not in others.

- 2.5 The overall contribution which individual sites are deemed by the Council to make in this context may be, in some cases, strictly appropriate as a grading exercise; however the reality is that the difference in Green Belt contribution between such sites may be marginal given the similarity of their scores against the individual purposes. It is important that the use of the Green Belt Assessment in selecting sites for allocation is moderated to reflect this. This evidence is a helpful tool in understanding the relative merits of different site options as part of a balanced overall appraisal, however immediately discounting sites within Outlying Settlements which are deemed to make a strong Green Belt contribution is a crude approach which is not appropriate, particularly in the context of the need to take a balanced overall view of sustainability and when sites are marginally different on only Green Belt scoring.
- 2.6 Critically, this approach is very clearly at odds with NPPF. Paragraph 142 states that *'when drawing up or reviewing Green Belt boundaries, the need to promote **sustainable patterns of development should be taken into account**'* [emphasis added]. That is to say that Green Belt harm cannot be the sole consideration and needs to be given the right level of weight alongside wider sustainability considerations in selecting sites for release. An approach of immediately discounting any site which is deemed to make a strong Green Belt contribution (particularly where this is so marginally different to a moderate contribution and is over scored to its detriment by the Council in one aspect) is evidently contrary to NPPF in this regard. This approach cannot be justified and is unsound therefore.
- 2.7 Further, it is apparent from the Council's Site Assessment Pro-forma report that whilst a site's overall Green Belt contribution is recorded, this is not then factored into a consideration of the site's relative suitability for allocation. In other words the Green Belt issue is used to count sites out, but not to weigh sites that are not counted out against each other. This is a fundamental procedural deficiency which means the Council's appraisal process does not have proper regard to Green Belt harm as part of a balanced assessment of the sustainability qualities of individual sites. It means the site selection process is not able to objectively identify the sites which are the most sustainable (and thus suitable for allocation) in overall terms.
- 2.8 Peel's previous representations raised these issues and set out a suggested remedy to address this point of unsoundness; given that the evidence base to which these comments relates remains unchanged, the previous comments stand. Peel's position is that the flaws in approach render the PUSLP unsound insofar as the selected allocations cannot be proven to represent the most sustainable when considered against reasonable alternatives. The PUSLP does not reflect an appropriate strategy, considered against reasonable alternatives, and cannot be justified.
- 2.9 To remedy these issues, it is necessary to expand the suitability criteria presented within the Council's Site Proformas Report (which has only been updated to assess sites submitted for consideration as residential allocations after the PSLP Regulation

19 Consultation) to include Green Belt contribution measured properly. The following scoring should be adopted:

- Sites which make a weak overall Green Belt contribution should be given a **yellow** score against this measure of suitability
- Sites which make a moderate overall Green Belt contribution should be given an **amber** score against this measure of suitability
- Sites which make a strong overall Green Belt contribution should be given a **red** score against this measure of suitability

2.10 A **red** score should not mean a site is automatically ruled out, for the reasons outlined above, though such a score would inevitably count against a site in a comparative exercise if all other things are equal.

2.11 This has implications for the relative suitability and sustainability of different allocation options. This is considered in more detail within the following sections of this Paper.

2.12 It is also noted that the Green Belt Site Selection Implications of Green Belt Release August 2021 ('Green Belt Site Selection Implications' assessment) has published alongside the PUSLP. It compounds the issues raised previously. These have not been addressed and sites excluded as a consequence remain so. Sites not excluded (and potentially proposed for allocation despite not representing the most sustainable options for accommodating growth) have been subject to an additional assessment which considers the effect of development on Green Belt purposes post development and considers the resulting Green Belt boundary.

2.13 The assessment takes into account the potential to remedy or mitigate issues identified. The assessment highlights that a number of sites will result in weak Green Belt boundaries which requires strengthening. The recognition of these shortcomings supports the analysis set out within this Paper that the approach to the assessment of the impact on the Green Belt is flawed and that this has contributed to sites being identified for allocation which do not represent the most suitable or sustainable option.

3. Outlying Settlement 1: Culcheth

Summary

The PUSLP proposes to release a single site from the Green Belt to the east of Culcheth and allocate this for residential development, with an assumed capacity of 200 dwellings (Policy OS2). The entirety of that site's southern and eastern boundary is non-durable, comprising a hedge line with intermittent trees and thus highly exposed to the wider expanses of open Green Belt beyond.

The Council's proposed allocation is not well associated with the existing settlement; it is valued for its scenic quality and representativeness of the Landscape Character Type 2: Mossland Landscape, which is assessed as being 'open and exposed'; and development would be clearly visible from Holcroft Lane (the main approach into Culcheth) and from Warrington Road, which defines the boundary to Culcheth.

Peel has historically promoted land to the north east of Culcheth for residential development. Peel's revised proposals for that site involve approximately 300 dwellings during the plan period with an associated safeguarded designation with capacity to provide a further 300 dwellings beyond the plan period. The plan period proposals also include the provision of a new Country Park for Culcheth, open space (potentially including playing pitches and allotments) and highways improvements and a new drop-off facility for Culcheth High School.

Peel's proposed development would represent a more sustainable approach to delivering the PUSLP development requirements of Culcheth and would realise significant and unique benefits in the process which other sites cannot. In addition, Peel's proposal provides the added benefit of making provision for contributing to meeting the development needs of Culcheth beyond the current plan period through a safeguarded land designation.

Culcheth's development requirement would be more sustainably met through the release of land to the north east of Culcheth as proposed by Peel. Site Allocation OS2 would not represent the most sustainable site option in this regard, with greater harmful effects than the alternative proposed by Peel. The selection of this site is unsound.

Introduction

- 3.1 The PUSLP proposes to release a single site from the Green Belt for residential development in Culcheth – land to the east of Culcheth (Policy OS2) with an assumed minimum site capacity of 200 dwellings. This reflects the proposed strategy of 'incremental growth' within the Outlying Settlements which underpins the PUSLP.
- 3.2 Peel has historically promoted a site to the north east of Culcheth for residential development. A detailed Development Prospectus, including site masterplan, was submitted as part of Peel's representations to the PDO consultation in 2017 along with a technical evidence base to demonstrate the deliverability of the site and how the

scheme could respond to potential site constraints. That Development Prospectus and the technical evidence base were updated and accompanied Peel's representations to the PSLP. A further update of both has been undertaken to accompany these representations to reflect changes in policy and the evidence base; Peel's proposals and the conclusions of the technical assessments are fundamentally unchanged.

- 3.3 They comprise a development of approximately 300 dwellings during the plan period with an associated safeguarded allocation with capacity to provide a further 300 dwellings beyond the plan period to meet the settlement's long-term development needs. Peel's plan period proposals also include the provision of a new Country Park for Culcheth, open space (potentially including playing pitches and allotments) and highways improvements and a new drop-off facility for Culcheth High School. This is shown in the masterplan at **Appendix 1**. **Appendix 2** shows how the release of Green Belt land would be approached in this location in order to ensure long-term durable Green Belt boundaries are provided. This is considered in further detail below.
- 3.4 For completeness, the Development Prospectus shows how the combined site could be delivered to provide 600 dwellings in total across two plan periods. The technical evidence base submitted with the Development Prospectus assesses, in some cases, a larger proposal relating to a larger area of land. A robust approach to the technical assessment of the site and its deliverability has therefore been taken.
- 3.5 This part of Peel's representation demonstrates that, in the context of the continuation of the strategy of incremental growth within the Outlying Settlements, Site Allocation OS2 would not represent the most sustainable means of delivering the settlement's growth requirements when considered against reasonable alternatives, rendering the PUSLP unsound. Peel's proposed development of land to the north east of Culcheth would represent a more sustainable approach to delivering the PUSLP development requirements of Culcheth and would realise significant and unique benefits in the process which other sites cannot. Its allocation would go some way to correcting the flaws that presently make the PUSLP unsound.
- 3.6 Peel's proposal provides the added benefit of making provision for contributing to meeting the development needs of Culcheth beyond the current plan period through the inclusion of a safeguarded land designation. Even if the PUSLP development requirements and spatial strategy were maintained, a need to make provision for safeguarded land to meet development needs beyond the plan period would exist (see Paper 1). Peel's proposal must be considered in this context.
- 3.7 The following paragraphs provide comments on the site selected for allocation through the PUSLP followed by a presentation of Peel's site and the reasons why it would present a more sustainable and beneficial allocation.
- 3.8 The comments focus principally on the Council's appraisal of each site as presented within the Site Assessment Pro-formas report published alongside the PSLP, and which continues to form part of the PUSLP evidence base. It is noted that candidate sites are also assessed through the PUSLP Sustainability Appraisal, though the appraisal framework and scoring system presented in Site Assessment Pro-formas report replicates that of the Sustainability Appraisal. The results within the Sustainability Appraisal and Site Assessment Pro-formas report as presented are also consistent.

Site Allocation OS2: Land to the east of Culcheth

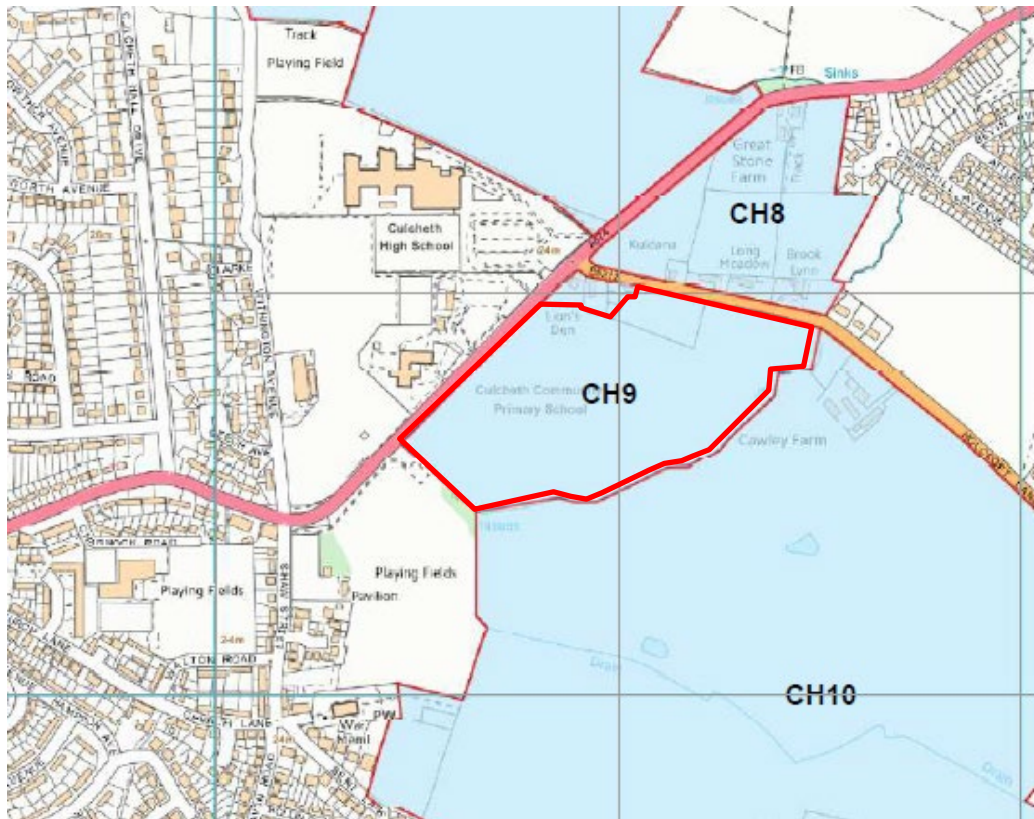
- 3.9 The above site has been selected for allocation in the PUSLP with an assumed minimum capacity of 200 dwellings. The Council's assessment of the site is presented in the Site Assessment Pro-formas report (Site references 3157² /). It is also assessed within the Council's Green Belt Sites report (site reference R/18/097).

Green Belt impact

- 3.10 The site corresponds almost identically with Green Belt Parcel CH9 as assessed through the Council's 2016 Green Belt Assessment. The site is shown in the context of Parcel CH9 in **Figure 3.1**.
- 3.11 The site pro-forma reports that the subject site makes a weak overall Green Belt contribution. This is taken from the Green Belt Assessment Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites (July 2017) report. This conclusion is repeated in the Green Belt Site Selection Implications of Green Belt Release assessment.
- 3.12 This overall conclusion turns principally on the appraisal against Green Belt Purpose 3 (to assist in safeguarding the countryside from encroachment) where the site is deemed to make only a moderate contribution.

² A small area fronting Holcroft Lane which is proposed to form part of the allocated site is also assessed under site ref. 3337 & R18/P2/064

Figure 3.1: Land east of Culcheth (Site allocation OS3) in the context of Green Belt Parcel CH9



3.13 In respect of Purpose 3, the site-specific Green Belt Assessment states that:

*“The boundaries between the site and the settlement are varied. **To the west is the A574, which is a durable boundary that could prevent encroachment into the parcel in the long-term.** However the southern boundary is a hedge line with trees which could not prevent encroachment into the parcel in the long-term. The eastern boundary links the parcel and the countryside and consists of a hedge line with intermittent trees which would not prevent encroachment beyond the parcel if the parcel were developed however to the north is the B5212 which is a durable boundary that could prevent encroachment beyond the parcel if the parcel were developed. The existing land use is predominantly open countryside with a cattery located within the parcel. The parcel is reasonably well connected to the countryside as has links on two boundaries. The parcel is flat with minimal built form and no vegetation and there are open long line views thus it supports a strong degree of openness. Overall, the parcel makes a moderate contribution to safeguarding from encroachment.”*

3.14 It is apparent from the above that the Green Belt Assessment identifies the durability of the existing boundary to the urban area (i.e. the interface between the site and the urban area) as relevant in determining the site’s contribution to Purpose 3. The inference being that if the existing urban boundary is durable then this would indicate a lesser contribution in respect of Purpose 3. This is clear from the bolded text above.

3.15 The A574 forms part of the site’s existing boundary with the urban area. The extent of this boundary, relative to the size of the site, is relevant as a determinant of the site’s

containment and thus the extent to which it is exposed to the wider expanse of Green Belt. However, whether the existing urban boundary is itself durable should not be seen as an indicator of the site making a weak contribution to Purpose 3.

- 3.16 On the contrary, a non-durable existing boundary with the urban area (say formed by rear gardens to residential properties) may suggest an opportunity to strengthen this boundary through the release of land and redefinition of the urban boundary on a new line and based on durable features (a road or thick tree belt for example) being incorporated into the associated development scheme. In this instance, the vast majority of the site's boundary with the urban area is already durable so no such opportunity exists and thus weakening the case for Green Belt release. The logic of the Council's approach does not bear scrutiny. The strong boundary of the site to the area that is not currently Green Belt counts against its suitability for development in terms of Green Belt purpose.
- 3.17 In determining a site's contribution to Purpose 3, the principle consideration is its interface with the wider expanse of Green Belt beyond its outer boundary, including both the extent of this and whether this boundary is durable or not. In respect of the subject site, the entirety of the site's southern and eastern boundary (approximately 539 m in length) is very clearly non-durable, comprising a hedge line with intermittent trees, as noted by the Council. This accounts for approximately 46 % of the overall boundary of the site. The site has a relatively high degree of exposure to the wider area of Green Belt beyond its boundary therefore.
- 3.18 The Green Belt Site Selection Implications assessment recognises this stating that the south western and eastern boundaries '*would need to be strengthened to create a recognisable and permanent new Green Belt boundary*'. Whilst strengthening part of a weak boundary may be a legitimate response to addressing a deficiency, in this case nearly half of the proposed Green Belt boundary would be weak which is a clear indicator that the site performs poorly in relation to this purpose.
- 3.19 As a result, Peel does not accept the finding that the site makes a moderate contribution to Green Belt Purpose 3 as indicated. Based on the site's interface with and exposure to the wider expanse of Green Belt (including to Parcel CH10 which the Council's Green Belt Assessment identifies as making a strong overall Green Belt contribution) it is concluded that the site makes a strong overall contribution to the Green Belt.

Landscape impact and relationship with the settlement

- 3.20 Whilst on any quantifiably measurable indicator the site may be considered to be accessible to local facilities and public transport, a consideration of the site's physical context reveals that it is not well connected into the existing settlement. The site is evidently not integrated into the existing built environment of Culcheth being peripheral to the main settlement area and located beyond an area of playing fields and Culcheth Secondary School, which mark the transition between the main built-up area of Culcheth and expanses of Green Belt and countryside beyond. These established uses sit comfortably in this more open setting, providing a limited level of built development and thus retaining the open character of area beyond Shaw Street and Withington Avenue as one experiences this part of Culcheth along Warrington

Road. Any existing development in this location takes on a very different form and character to that located within the main built-up area of the settlement to the east.

- 3.21 The proposed allocation conflicts with this in leapfrogging the lower density and recreational uses within this transitional area to introduce development that will have a considerable urbanising effect on an open area of land which does not share a boundary with the physically built-up area of Culcheth. Its development evidently conflicts with the established open and more rural character of this part of the settlement.
- 3.22 The site is substantially peripheral to the existing settlement in this regard, presenting itself as an unnatural and isolated intrusion into the open land beyond the settlement and disconnected from it. As a result, the development of this site cannot achieve an effective integration with the existing urban area and will result in a somewhat contrived bolt on to the settlement. This is in conflict with the objective of achieving well-designed places through the plan-making process as required by NPPF.
- 3.23 Considering the site in its landscape, townscape and visual context, attention is also drawn to the following:

Townscape impact

- 3.24 The location of the site is not well associated with the existing settlement of Culcheth. The site is open and exposed and there are clear views across the open agricultural land from Holcroft Lane. Development of the site will alter the approach to Culcheth from Holcroft Lane. Development within the site has the potential for Medium- High effects on the townscape character of Culcheth.

Landscape impact

- 3.25 The site sits within Landscape Character Type 2: Mossland Landscape as defined within the Council's 2007 Landscape Character Assessment³
- 3.26 Within this character type the site falls within Landscape Character Area 2B: Holcroft & Glazebrook Moss. Landscape Character Area 2B is described within the Council's assessment being "*open and exposed*", with a "*general absence of hedgerows and hedgerow trees*". The Assessment notes that there is very little settlement within this area. The site is valued for its scenic quality and representativeness of the landscape character. A public right of way traverses the landscape to the south of the site within the study area giving some recreational value. Assessed against this baseline, Peel considers that is more sensitive in landscape terms and its development will therefore result in a greater level of landscape harm than the site promoted by Peel.

Visual impact

- 3.27 The site is clearly visible from Holcroft Lane (the main approach into Culcheth) and from Warrington Road which defines the boundary to Culcheth, offering views east across open countryside. The potential effects of development on visual amenity are considered to be Medium-High.

³ Warrington: a landscape character assessment (Warrington Borough Council 2007)

- 3.28 Overall it is concluded that the potential constraints for future development of this site are Moderate to Major. This contrasts with the Council's site appraisal which notes that development of the site would result in a moderate change to landscape character.

Assessment of Peel's proposal – land north east of Culcheth

- 3.29 The plan at **Appendix 1** illustrates how the site promoted by Peel to the north east of Culcheth could be developed in two phases, with Phase 1 being delivered during the plan period providing approximately 300 dwellings, and Phase 2 being designated as safeguarded land (and with a post-plan period capacity for 300 dwellings). The need for safeguarded land and its distribution to a number of locations across the Borough is set out in Paper 1 of Peel's representations.
- 3.30 Peel's proposal is articulated through a detailed Development Prospectus which shows how the site could come forward over the plan period and beyond. This is supported by a comprehensive technical evidence base which has informed the site masterplan and demonstrates that the site is deliverable and its development will not give rise to unacceptable impacts in respect of access and traffic impacts, ecology, agricultural land, flood risk and drainage and arboriculture.

Strategic open space benefits

- 3.31 Alongside residential development, Peel proposes to deliver a new Country Park to the north of its proposed residential development, accessible to and benefitting the wider community, as well as a more formal open space / recreation area to the east of the residential development area. The latter could include a range of open space uses, including sports pitches and allotments as required.
- 3.32 The Country Park and open space proposal would be a major asset for Culcheth and a unique benefit of the proposed development. This proposal can address a critical shortfall in the provision of various typologies of open space within Culcheth as reported in the Council's 2015 Open Space Audit, including:
- Semi-natural green space (total area deficit of 11.85 ha)
 - Equipped play (total area deficit of 2.11 ha)
 - Parks and gardens (total area deficit of 18.74 ha)
 - Allotments (none recorded in the area)
- 3.33 The open space offer can be shaped to respond to these deficits.
- 3.34 The importance of open space and access to recreation and nature is elevated following the COVID 19 pandemic. The ability to deliver these benefits through the scheme proposed by Peel is an important benefit that is unique to Peel's scheme. Significant weight should be placed on this aspect of the scheme.
- 3.35 In total, just less than 59ha of land would be released from the Green Belt in this scenario, comprising the plan period residential development area, land to the west to

be safeguarded and land to the east accommodating the open space / recreation area. The latter would be subject to a new policy designation as *'Proposed open space/recreation to be delivered alongside residential development to the east'*, thus precluding its development for other purposes. The Country Park to the north would also be subject to a *'Proposed country park'* policy designation but would remain within the Green Belt. This is articulated through the plan at **Appendix 2**.

Transport benefits

- 3.36 The masterplan for Peel's scheme shows how this proposal could incorporate a new access and drop-off area for Culcheth High School, located off the development access road that connects with Warrington Road. The new site access from Warrington Road could include a priority-controlled junction or traffic-light controlled junction; either option would allow for provision of a drop-off zone within the Peel site for the school. Easy access will be provided to this area located a short driving distance from the main road.
- 3.37 The new facility will allow significantly better management of access to the school with conflicts removed from Warrington Road including the U-turns that are made at the Warrington Road/Holcroft Lane Junction. This will result in operational and road safety benefits, for both school related and general traffic movements addressing longstanding issues associated with the traffic and transport impacts of the school. This represents a significant benefit directly associated with the allocation of this site.

A long-term development opportunity

- 3.38 Peel's proposal provides the benefit of providing a strategy for the long-term planned and managed growth of the settlement, through an initial plan period development and then a natural and logical second phase of development beyond the plan period utilising land to west. This reflects the need for the Outlying Settlements to accommodate safeguarded land to meet development requirements beyond the plan period (see Paper 1 of Peel's submission).
- 3.39 In this context there are significant advantages to locating safeguarded land where it can build on and be planned as part of plan period releases, thus reducing the number of separate Green Belt releases in the settlement and avoiding a piecemeal approach to its long-term growth. Candidate Green Belt releases need to be considered in this context.
- 3.40 That Peel's site lends itself to this comprehensive approach is a significant advantage over other potential Green Belt releases where no such opportunity beyond the plan period exists without breaching durable Green Belt boundaries and releasing more sensitive Green Belt land.
- 3.41 The proposed PUSLP allocation does not present an equivalent opportunity to build on the existing development in a sustainable manner. The further outward expansion of allocation OS2 would take in open Green Belt land and reinforce the development's physical disconnection and isolation from the main settlement area.
- 3.42 It is important to have full regard to these benefits in considering Peel's proposal against other candidate site allocations.

Appraisal against the Council’s suitability measures

- 3.43 Reflecting the Council’s adopted approach, none of Peel’s land located to the north east of Culcheth has been assessed by the Council as a potential allocation given the Council’s finding that the suggested site makes a strong contribution to the Green Belt.
- 3.44 Section 2 of this representation challenges this approach. For the avoidance of doubt, Peel considers that all sites, including those which may be deemed to make a strong contribution to the Green Belt, should have been considered by the Council.
- 3.45 As the Peel site has not been assessed within the Council’s evidence base, the table below considers the Peel proposal against the ‘suitability measures’ used by the Council in the Site Assessment Pro-forma Report.

Table 3.1: Land north east of Culcheth, site appraisal

Suitability measure	Land north east of Culcheth (Peel’s proposal)
A physical point of access into the highway	<p>Access to the eastern part of the site (‘Phase 1’) can be created from Warrington Road (A574) in the south eastern corner of the site. The western part of the site (‘Phase 2’) would be accessed from Twiss Green Lane. If required, additional emergency service connections could be provided through Wellfield Woods and from Withington Avenue.</p> <p>Development of the site provides an opportunity to resolve existing highways issues on Warrington associated with Culcheth High School. Provision of a new access road and drop-off area for the school, including potential for an off-set roundabout to Warrington Road, is a significant benefit of Peel’s proposals which would help to alleviate existing issues and be of benefit to the wider community and operation of the highway network.</p>
Distance to principal road	<p>Warrington Road (A574) adjoins the site to the south east (<1 mile). The submitted Transport Appraisal demonstrates that access can be taken directly from Warrington Road.</p>
Proximity to employment	<p>A number of employment opportunities are available within Culcheth; within walking and cycling distance of the site. further employment opportunities are available at Birchwood Park (one of the Borough’s flagship employment locations) and Warrington Town Centre; both of which are easily accessible from the site, including by bus.</p>
Community facilities	<p>Community facilities are available within walking and cycling distance of the site, within the existing settlement of Culcheth.</p>

Proximity to natural green space	A new country park for Culcheth and significant areas of open space can be provided on the site, as demonstrated through the concept masterplan and Development Prospectus. This will be of benefit to existing as well as new residents of Culcheth and is a significant benefit of Peel's proposals.
Access to playspace	Formal play space can be provided as part of the open space to be delivered on the site. Indicative locations for play space (LEAP and NEAP) are shown on the concept masterplan.
Access to primary schools	Culcheth Community Primary School is located adjacent to the southern boundary of the site and Twiss Green Community Primary School adjoins the western site boundary.
Access to bus service	A number of regular bus services serve the site, including the 28/28A and 19 which each provide hourly services between Leigh and Warrington, and the 587 which provides hourly services between Culcheth and Leigh.
Access to train station	Birchwood train station is 3-5km from the site, but is accessible through the use of the 28 bus service which has an hourly frequency.
Access to GP/health centre	GP / health facilities are available within Culcheth and within <1200m of the site.
Air quality impacts	The site is more than 1km away from the nearest AQMA.
Remediation opportunity	Given the historic agricultural use of the site, contamination is not expected.
Loss of high quality agricultural land	The Predicted Agricultural Land Classification report undertaken by Reading Agricultural indicates that the site comprises predominantly Grade 3a and 3b agricultural land.
Within a Groundwater Source Protection Area	The site does not fall within a Groundwater Source Protection Area, as identified by the Environment Agency.
Within a flood zone	The majority of the site is located within Flood Zone 1 (low risk) as identified by the Environment Agency. Whilst small areas of the site close to Jibcroft Brook fall within Flood Zones 2 and 3, no built development is proposed within these parts of the site.
Sterilisation of safeguarded or identified mineral reserves	The site is not located within an identified Mineral Safeguarding Area; therefore, no effects are expected.

Proximity to heritage assets	<p>A Heritage Appraisal of the Peel proposal has been undertaken and identifies heritage assets with the potential to be affected by development of the site. Although the site contributes to the setting of the Culcheth (New Church) Conservation Area, this is largely attributed to the western part of the site. The site does not contribute to any other heritage assets. Development of the type and arrangement identified in the masterplan will sustain the significance of nearby heritage assets.</p>
Impact on significance/setting of historic assets	<p>As above, the concept masterplan reflects the outcome of the Heritage Appraisal and proposes a form of development which would sustain the significance of nearby heritage assets.</p>
Capacity of the landscape to accommodate development	<p>The site falls within Landscape Character Type 1: Undulating Farmland, which is wide spread across the Borough. The Landscape Appraisal undertaken by Randall Thorp demonstrates that the site is contiguous with the north-east edge of Culcheth. It is noteworthy that this landscape has a greater capacity to accommodate change than that of the proposed site allocation OS3 based on the Council's own Landscape Assessment work (2007)</p> <p>The concept masterplan would provide housing within a well landscaped setting, with existing landscape features preserved within a new Country Park and new woodland and tree planting on the northern and eastern site boundaries.</p>
Potential impact on European site, SPA or SAC	<p>There are two SAC within 10km of the site. However, due to their distance from the site (2.5km and 5.3km at their closest points) and reasons for designation, no impacts are anticipated on either site.</p>
Impact on SSSI	<p>The site is located within two SSSI Impact Risk Zones. However, residential development is not identified as of concern for either SSSI. As such, no impacts on SSSI are expected.</p>
Impact on wildlife sites, local nature reserves, RIGs, potential wildlife sites etc	<p>Hitchfield Wood Local Wildlife Site (LWS) is located within the north east of the site and is proposed for retention and incorporation into the new Country Park. any necessary mitigation to overcome indirect negative impacts (e.g. air and waterborne pollution, damage to tree routes and increased public pressure, can be secured at planning application stage. Potential mitigation measures are provided within the Ecological Appraisal for the site which has been prepared by TEP.</p>

TPO impact	Wellfield Wood, which is located within the site, is covered by a TPO. This woodland is proposed for retention through development of the site.
Promote brownfield development	Site is greenfield.
Access to a household recycling centre	c. 6 miles to Leigh Waste and Recycling Centre.
Overall suitability score	

Green Belt contribution

- 3.46 Peel's representation to the 2016 Regulation 18 consultation on the Local Plan provided comments on the Council's Green Belt Assessment 2016. Through this Peel made a case that the defined Green Belt parcels which the site it is promoting for development (Parcels CH2 to CH7) should be redrawn to the Manchester-Liverpool railway to the north of Culcheth and their contribution to the Green Belt assessed on this basis. This reflects the Green Belt Assessment's own methodology of seeking to define parcels only on durable lines where possible. It is evident that Parcels CH2 to CH7 have been incorrectly defined in this regard and in a manner at odds with the Green Belt Assessment's own methodology.
- 3.47 This is significant since the Manchester-Liverpool railway, a very strong boundary, is located just 180 m to the north of these Parcels. It would be somewhat misleading to assess Parcels CH2 and CH7 without recognising this and assessing their Green Belt contribution, particularly in respect of Green Belt Purpose 3 (to assist in safeguarding the countryside from encroachment) in the context of the presence of this strong boundary.
- 3.48 In accordance with the Green Belt Assessment's own methodology, this would mean the parcels being drawn along durable boundaries and on which basis their contribution would be adjusted from **strong** to **moderate**.
- 3.49 Notwithstanding this, Peel's proposal as presented includes the provision of strategic areas of green space surrounding its development site and the proposed safeguarded area which can function as long-term durable boundaries to the Green Belt preventing further encroachment of the urban area following the release of Peel's land through the Local Plan.
- 3.50 As shown at **Appendix 2**, the land to the north of the development area up to the railway line would remain within the Green Belt but would be subject to a new 'country park' policy designation to protect the area from development. Thus the new Green Belt boundary defined by the northern extent of developed area would be bound by a protective policy designation which would prevent encroachment of the urban area north. This will reinforce the permanence of the redefined urban boundary. The same would apply to the land to the east, proposed as an area of 'Open Space' which, though

removed from the Green Belt, would provide a protective gap between the urban area and the Green Belt acting as a long-term durable boundary.

- 3.51 This strengthening of the Green Belt boundary would reduce the Green Belt contribution of the site from strong to **weak-moderate**.

Landscape and character impact

- 3.52 Peel's site is located within defined Landscape Character Area 1C: Winwick, Culcheth, Glazebrook and Rixton, which is part of Landscape Character Type 1 – Undulating Enclosed Farmland based on the Council's Landscape Character Assessment (2007). Compared to allocation OS2, which is located within a different landscape character area, this area is considered to have significant potential to accommodate new development with appropriate landscape, townscape and visual mitigation primarily due to this character area generally consisting of arable farmland, which has changed and adapted as a result of various pressures over time, often degrading in quality in the process.

Relationship with the settlement

- 3.53 Peel's site is located within walking distance of the defined Centre within Culcheth via a number of pedestrian connections. These connections effectively knit the site into the existing settlement area, thus meaning a pedestrian and cycle friendly form of development can be delivered, promoting sustainable transport options and helping achieve an effective integration into the settlement. Its significant interface with the existing urban area along its southern boundary helps to achieve this integration and thus improving its connectivity with key services. This compares with Site Allocation OS2 which, for the reasons outlined, has a tenuous relationship with the main settlement area. Its allocation and development does not reflect a sustainable form of settlement expansion in this regard.

Revised site scoring

- 3.54 Taking the above comments into account, the Table at Appendix 7 presents a comparison of the relative suitability scoring of the Council's proposed allocation (OS2) against Peel's proposal to the north east of Culcheth.

- 3.55 In addition to, and reflecting the comments provided, a consideration of Green Belt harm should also be included in the suitability assessment. This is a critical consideration in providing a fully rounded view on the relative suitability of contender sites. In respect of these items, the following scoring should be given to the sites assessed above:

- **Site allocation OS2:** **Amber** reflecting a moderate Green Belt contribution
- **Land north east of Culcheth:** **Yellow/Amber** reflecting a weak/moderate Green Belt contribution

- 3.56 Based on the revised scoring presented at Appendix 7 and taking the Green Belt contribution into account in the suitability assessment, it is demonstrated that the proposed site to the north east of Culcheth would, in overall terms, achieve a better

suitability score than allocation OS2. It would achieve a better score in respect of **four** grounds and a worse score in respect of **one** ground.

- 3.57 Both sites would have a **green** availability score. This would reflect that Peel's proposed plan period allocation would utilise land entirely in its control.
- 3.58 The site to the north east of Culcheth should be given a **green** achievability score reflecting comments above. It is accepted that Site OS2 should also be given a **green** achievability score in accordance with the Council's assessment.
- 3.59 It is concluded on this basis that the proposed site to the north of Culcheth, as promoted by Peel would, in overall terms, represent the most suitable and most sustainable site for allocation to meet Culcheth's development needs when compared against the site selected for allocation in the PUSLP.

Other benefits of land north east of Culcheth

- 3.60 It is also important to recognise the significance of Peel's site's relationship with the existing settlement in being conducive to promoting a sustainable form of development which effectively integrates with the existing settlement through a natural and discreet extension to it. This contrasts with the selected allocation OS2 which does not have a direct interface with the physical built-up area of the settlement. Its development would contribute to the fragmented and unsustainable long-term growth of the settlement. Further, Peel's proposal is located within a landscape area which the Council's is considered have a greater capacity to accommodate change based on its baseline character and the extent to which it already contains built development. Significantly less harm would arise from its development, compared to the selected site allocation OS2 in this regard.
- 3.61 Peel have met with Culcheth High School to discuss the Peel proposals at Culcheth. Due to pupil demand the school is likely to look to expand its facilities in the future. Peel's site adjoins the school site and there is potential, therefore, to provide additional land for a future expansion of Culcheth High School.
- 3.62 Finally, as outlined above, Peel's proposals will deliver significant and unique benefits derived from this site, including the provision of strategic open space, transport improvements along Warrington Road and the opportunity to include a safeguarded land provision and thus contribute to meeting the long-term (post-plan period) development needs of the settlement, and thus avoiding the piecemeal future expansion of the settlement, all of which weigh further and substantially in favour of the proposed allocation of Peel's site.

Culcheth – conclusions and amendments needed to correct soundness

- 3.63 The assessment above has demonstrated that:
- 1) The Council has understated the Green Belt contribution made by the site it has selected for allocation to the east of Culcheth (OS2). This site should be recorded as making a strong rather than weak overall contribution to the Green Belt.

- 2) The Council has understated the townscape, landscape and visual impacts of the development of the proposed allocation. The potential change to landscape character as a result of the development of the proposed Council's allocation should be recorded as Moderate to Major, rather than Moderate. Peel's site is located within a different defined landscape area which has a greater capacity to accommodate change, as confirmed within the Council's 2007 Landscape Character Assessment.
- 3) The Council has failed to assess Peel's land to the north east of Culcheth as a potential allocation given the Council's finding that the site makes a strong contribution to the Green Belt. This approach is challenged in Section 2 of this representation.
- 4) An assessment of the Peel proposal against the 'sustainability' measures used by the Council in the Site Assessment Pro-Forma Report concludes that the proposal would have an overall suitability score of yellow.
- 5) Peel's proposal as presented included the provision of strategic areas of green space surrounding the residential development which would be subject to a new policy designation to protect the area from development. This would reinforce the permanence of the redefined urban boundary and provide a 'protective gap' between the urban area and the Green Belt, acting as a long-term durable boundary. This strengthening of the Green Belt boundary would reduce the Green belt contribution of the site from strong to weak-moderate.
- 6) Development of the Peel proposal has the potential to deliver additional benefits for new and existing residents of Culcheth that cannot be achieved through the development of the Council's proposed allocation. This includes a new country park for Culcheth and a new drop-off area for Culcheth High School which will help to alleviate existing issues along Warrington Road and the potential to accommodate a future extension of the school.

3.64 The cumulative effect of the above is that the proposed allocation of land to the north east of Culcheth for development during the plan period would present a more sustainable option than the site selected by the Council (Site Allocation OS2).

3.65 In addition, the Peel proposal offers further development potential beyond the plan period. A larger, well contained and logical Green Belt release can be delivered in this location which includes an appropriate element of safeguarded land, the need for which is outlined in Paper 1 of Peel's representation. No such proper opportunity exists in respect of the Council's proposed allocation (OS2) given its relationship with the urban area whereby any safeguarded 'add on' would present itself an unorthodox protrusion into open and exposed Green Belt land.

3.66 This is a relevant consideration insofar as the Council is required to identify land for release from the Green Belt beyond that needed to meet housing needs over the plan period, as set out in Paper 1. Any candidate locations for allocation need to be assessed on the basis of a larger area being released therefore and it would be inappropriate to limit the consideration of Green Belt harm only to the land which is needed during the plan period.

3.67 Peel contends that the Council's failure to reach the same conclusion results from a flawed appraisal process and therefore a deficient evidence base to underpin and the selected allocation. The selected site allocation cannot be justified and this aspect of the PUSLP is unsound as a result. The allocation of land to the north east of Culcheth for part development during the plan period and part safeguarding to meet development needs beyond the plan period would correct this specific point of unsoundness.

4. Outlying Settlement 2: Croft

Summary

The PUSLP proposes to release land to the north east of Croft for residential development of approximately 75 dwellings (Policy OS1).

Peel has historically promoted an alternative site located off Lady Lane, Croft for residential development. The updated Development Prospectus for the Lady Lane site submitted with the PSLP representations presented an alternative iteration of Peel's previously submitted proposals illustrating how the land at Lady Lane could be released to deliver a lower level of development during the plan period (83 units), with the balance designated as safeguarded land to meet requirements beyond the current plan period (112 units). The proposed approach is fundamentally unchanged.

This section compares the Council's proposed allocation at north east of Croft (Policy OS1) against Peel's alternative proposal for land at Lady Lane, Croft. It demonstrates that Peel's proposals would present a more appropriate and sustainable allocation than the Council's proposed allocation.

In addition, the Lady Lane site offers further development potential beyond the plan period. A larger, well-contained and logical Green Belt release can be delivered in this location which includes an appropriate element of safeguarded land, the need for which is outlined in Paper 1 of Peel's representation. Taking a long-term approach to the growth of the settlement mitigates the risk of its piecemeal expansion beyond the plan period. No such opportunity exists in respect of the site north east of Croft.

Croft's development requirement would be more sustainably met through the release of land at Lady Lane as proposed by Peel. Site Allocation OS1 would not represent the most sustainable site option in this regard, with greater harmful effects than the alternative proposed by Peel. The selection of this site is unsound.

Introduction

- 4.1 The PUSLP proposes to release a single site from the Green Belt for residential development in Croft – land to the north east of Croft (Policy OS1) with an assumed site capacity of 75 dwellings. This reflects the proposed strategy of 'incremental growth' within Croft and the other Outlying Settlements which underpins the PUSLP.
- 4.2 Peel has historically promoted an alternative site located off Lady Lane, Croft for residential development. A detailed Development Prospectus, including site masterplan, was submitted as part of Peel's representations to the PDO consultation in 2017 along with a technical evidence base to demonstrate the deliverability of the site and how the scheme could respond to potential site constraints, including heritage and ecological issues. That Development Prospectus and the technical evidence base were updated and accompanied Peel's representations to the PSLP. A further update of

both has been undertaken to accompany these representations to reflect changes in policy and the evidence base; Peel's proposals and the conclusions of the technical assessments are fundamentally unchanged.

- 4.3 This part of Peel's representation presents an alternative iteration of Peel's proposal showing how the land at Lady Lane could be released to deliver a lower level of development during the plan period (83 units) than that proposed at PDO stage with the balance designated as safeguarded land to meet requirements beyond the current plan period and with a capacity for a further 112 units. For completeness, the updated Development Prospectus for the site shows how the combined site could be delivered to provide 195 dwellings in total across two plan periods.
- 4.4 This phasing approach has been taken to enable an alternative version of Peel's proposal, more commensurate in scale to the size of the settlement and the level of development proposed within it through the PUSLP, to be considered. This allows Peel's site to be assessed against the proposed allocation on a more equal and comparable basis and to demonstrate that Peel's proposal represents a suitable and sustainable alternative which can be delivered in the context of the PUSLP strategy of 'incremental growth' within Croft.
- 4.5 In this context, Peel's proposal provides the added benefit of making provision for meeting the development needs of Croft both during and beyond the current plan period, including through a safeguarded land designation covering part of the site. Even if the PUSLP development requirements and spatial strategy were maintained, a need to make provision for safeguarded land to meet development needs beyond the plan period would exist (see Paper 2). Peel's proposal must be considered in this context.
- 4.6 The plan at Appendix 3 therefore shows how the site promoted by Peel could be developed in two phases during and beyond the plan period as proposed.
- 4.7 The following paragraphs provide comments on the site selected for allocation through the PUSLP followed by a presentation of Peel's site and the reasons why it would present a more appropriate and sustainable allocation.
- 4.8 The comments focus principally on the Council's appraisal of each site as presented within the Site Assessment Pro-formas report published alongside the PSLP. It is noted that candidate sites, including Lady Lane, are also assessed through the PSLP Sustainability Appraisal, though the appraisal framework and scoring system presented in Site Assessment Pro-formas report replicates that of the Sustainability Appraisal. The results within the Sustainability Appraisal and Site Assessment Pro-formas report as presented are also consistent.

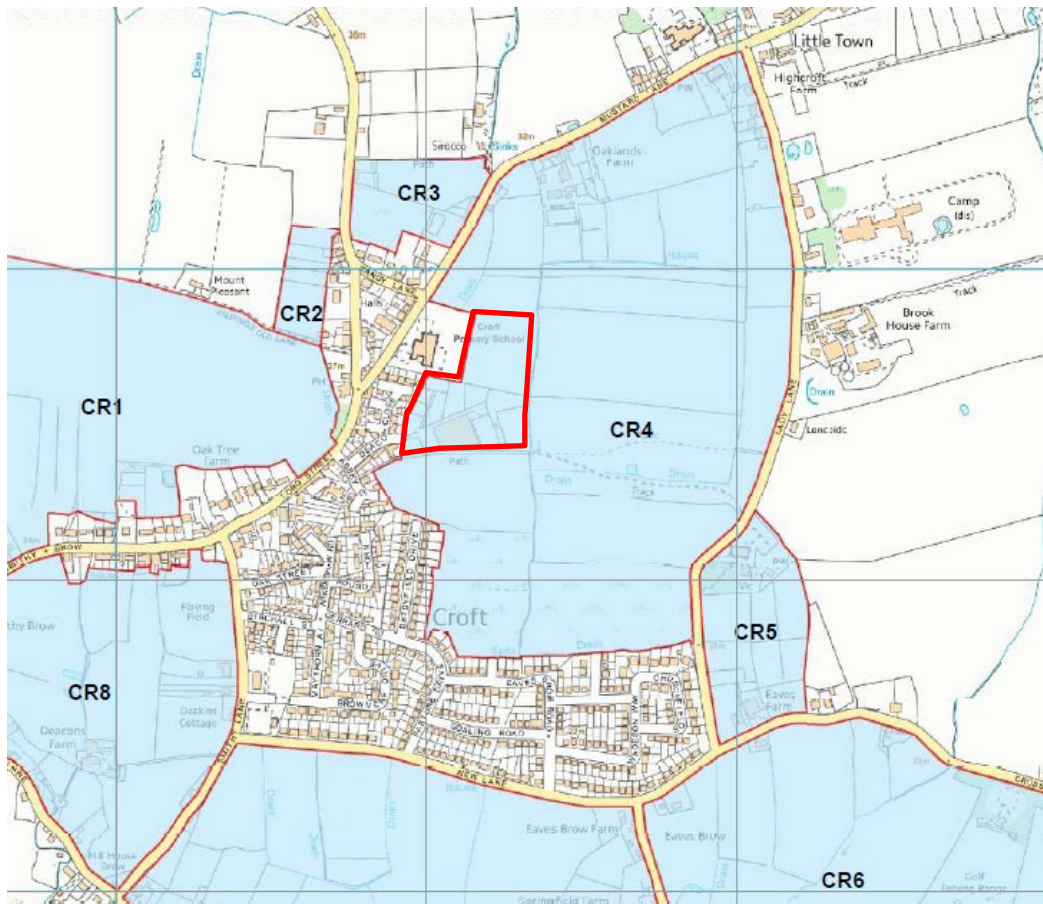
Site allocation OS1: Land to the northwest of Croft

- 4.9 The above site is proposed for allocation in the PUSLP with an assumed capacity of approximately 75 dwellings.

Green Belt

- 4.10 The site has been considered through the Council's Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) (2017) (site reference R18/095). This identifies that the site makes a weak overall contribution to the Green Belt. This conclusion is repeated in the Green Belt Site Selection Implications of Green Belt Release assessment. The site forms part of a larger defined Green Belt Parcel (CR4) which is identified as making an overall moderate contribution to the Green Belt through the 2016 Green Belt Assessment. The proposed allocation comprises approximately 15% of the parcel as shown in **Figure 4.1**.

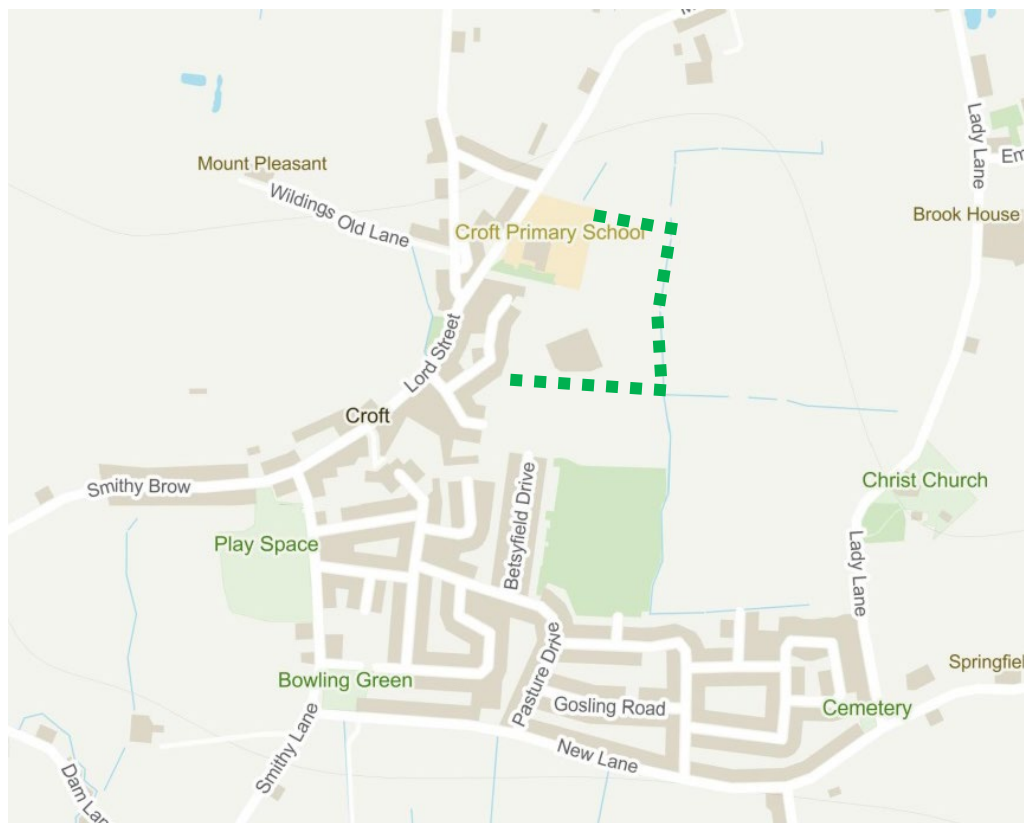
Figure 4.1: Site allocation OS1 in the context of Green Belt Parcel CR4



- 4.11 In Green Belt terms, the site has a limited interface with the urban area to the west. It is bound on three sides (north, south and east) by open expanses of Green Belt. All three boundaries with the wider Green Belt are non-durable, in accordance with the definition provided in Table 3 of the Council's 2016 Green Belt Assessment. This contrasts with the Council's site assessment which indicates that the southern boundary is durable, comprising a 'hedge lined footpath.' Table 3 of the 2016 Green Belt Assessment is clear that a 'Footpath accompanied by other physical features (e.g. wall, fence, hedge)' is a 'feature lacking durability'. The site assessment of the draft allocated site, from a Green Belt point of view, is therefore inconsistent and in error.

- 4.12 The Green Belt Site Selections Implications assessment recognises the weakness of the northern and eastern boundaries, stating that *‘these would need to be strengthened to create a recognisable and permanent new Green Belt boundary’*.
- 4.13 The site’s interface with the wider Green Belt and its non-durable boundaries account for some 79% of its perimeter, as illustrated through **Figure 4.2**. Its interface with the urban area extends to just 128m, accounting for 21% of the site’s perimeter.

Figure 4.2: Length of non-durable boundary and interface with the wider Green Belt (Site allocation OS1)



- 4.14 In addition to the issues raised above, the site appraisal overstates the extent to which the site’s openness has already been compromised by the presence of built development within it, so as to downplay the effect on openness from its development in error. The site accommodates an existing single storey building with a footprint of approximately 3,200 sq m. The total area of the site is approximately 3.5 ha. Thus less than 10% of the site is occupied by existing buildings – 2 to 3x less than stated by the Council’s assessment.
- 4.15 The combined effect of these points is that the Council’s conclusion that the site makes a weak contribution to the Green Belt is clearly inaccurate. Whilst a proportion of the site is occupied by built development, and thus its openness has been compromised to some degree, this accounts for a fraction of the site. Any effect that the site’s partially developed status has on reducing its Green Belt contribution is more than offset by the site’s significant exposure to the wider Green Belt and the absence of non-durable boundaries along this interface.

- 4.16 Accordingly, the site should be recorded as making a strong contribution to Purpose 3 and an overall strong contribution to the Green Belt.

Site access

- 4.17 The site appraisal pro-forma states the following:

“Access to this site requires the widening of the existing access to Heathcroft Stud which is outside of the extent of the adopted highway (the highway is up to the point where the carriageway narrows). The widening of the access would require land on both sides of the road (within the curtilage) of Nos 16 and 18 Deacons Close to provide a 5.5 m carriageway and 2m footways on each side; this is achievable but takes part of the rear garden of No. 18 and part of the front garden and parking area of No. 16 (which would need to be replaced so as to maintain parking provision). The submitted plan from the site representation indicates that both dwellings are within the redline boundary and these are confirmed as available.”

- 4.18 By the Council’s own admission, there are access constraints to delivering the site. These are claimed not to be insurmountable with the requisite land being ‘*confirmed as available.*’ The additional land take, and encroachment into the gardens of 16 and 18 Deacons Close is significant. At this stage, the Council has not provided any evidence that this land is available and appears to rely solely on the site promoter’s reassurance to this effect.
- 4.19 Given that the PUSLP proposes the allocation of only one Green Belt site in Croft, and the fact that the SHLAA indicates that the settlement has no urban land capacity, it is a critical requirement that there is a sufficient level of certainty that the proposed allocated site will be delivered. The implications of the site not being delivered is significant in terms of meeting Croft’s development needs given the reliance placed on this site.
- 4.20 In the circumstances, it is insufficient to rely on this allocation with the level of risk to its non-delivery presented. This deliverability constraint should be reflected in the Council’s appraisal of the site. The ability to achieve a physical point of highway access should be scored red therefore.

Brownfield land

- 4.21 The site is identified by the Council as comprising in excess of 70% brownfield land. It therefore achieves a positive score against this measure of sustainability.
- 4.22 Whilst the site is partly previously developed, including both buildings and hardstanding, this accounts for a maximum of 25% of the site area. The site is predominantly greenfield, contrary to the Council’s assessment, and should therefore be given a **yellow** score against this measure. This fundamentally changes its scoring against this criteria and reduces its overall performance against the Council’s sustainability criteria.
- 4.23 It is also instructive to note the likelihood that the business which currently occupies the site will seek new premises when it is displaced from its existing site. The business’s occupation of its current site is a result of such a displacement from land to the west around Deacons Close. Given the nature of the use (an equestrian business and with a

historic connection to Croft), the business is again likely to seek a site within the Green Belt around Croft upon displacement from its current site. As such, whilst the proposed allocated site is partly brownfield land, the overall net impact on the Green Belt of the site's development is likely to be the same as if the site were entirely greenfield as a new site, most likely greenfield land within the Green Belt, will need to be identified for the development of replacement premises for the existing business.

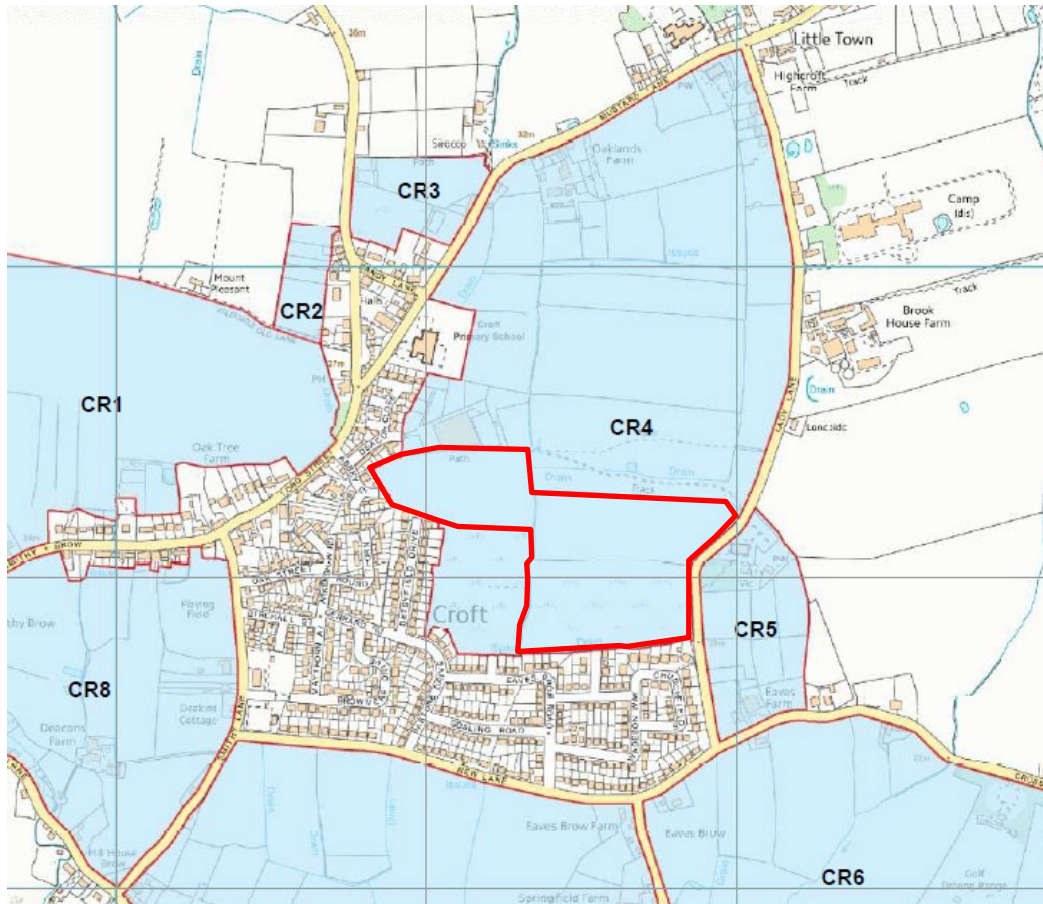
Assessment of Peel's proposal – land at Lady Lane

- 4.24 The plan at **Appendix 3** illustrates how the site promoted by Peel at Lady Lane could be developed during the plan period and beyond. As noted, Phase 1 would deliver approximately 83 dwellings with Phase 2 being designated as safeguarded land and with a capacity also for c.112 dwellings.
- 4.25 This Paper demonstrates the ways in which the Peel site is preferable to the draft allocation, to meet Croft's housing requirements and provide safeguarded land for the future.
- 4.26 The Council has considered the full site area (Phases 1 and 2 as presented by Peel) as a potential allocation for development. It gives the site an overall **yellow** score in respect of its suitability, an **amber** score in respect of its achievability and a **green** score in respect of availability. Comments on key aspects of the appraisal are presented below.

Green Belt

- 4.27 The full site area is assessed through the Council's Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites 2017; site reference R18/127). This identifies that the site makes an overall moderate Green Belt contribution. It forms part of the same Green Belt parcel as the proposed allocation site OS1. The site's location in the context of the wider Green Belt parcel is presented in **Figure 4.3**.

Figure 4.3: Land at Lady Lane in the context of Green Belt Parcel CR4



- 4.28 The site is recorded by the Council as making a strong contribution in respect of Purpose 3 (to assist in safeguarding the countryside from encroachment). This conclusion is partly drawn due to the site’s boundary with the existing urban area comprising the rear gardens of existing residential properties which are themselves identified as a non-durable boundary. The Council’s appraisal concludes that:
- “Overall the site makes a strong contribution to safeguarding from encroachment due to its strong-moderate openness **and non-durable boundaries with the settlement.**”*
- 4.29 The durability of a site’s boundary with the existing urban area is largely academic to any consideration of the site’s Green Belt contribution. As a point of principle, any durability of the site’s boundaries should focus on its interface with the wider expanse of Green Belt and therefore the extent to which the release of the site could pave the way for further encroachment into the retained Green Belt beyond. Very clearly the risk of such encroachment beyond the site is not in any way influenced by the existing boundary to the urban area.
- 4.30 To the extent that the durability of the existing urban boundary is relevant, the presence of non-durable boundaries should indicate a lesser Green Belt contribution, or more accurately an opportunity to reinforce and strengthen the Green Belt boundary and thus the Green Belt’s long-term durability. This may be achieved through redrawing of the urban boundary along a stronger, more durable base through

designing such a feature into the scheme (e.g. through a perimeter road or tree planting). The Council's analysis on this point is therefore in error and the nature of the boundary to the existing edge of the settlement is to its advantage, not its disadvantage.

- 4.31 Giving adverse weight to a site's non-durable boundary with the existing urban area in determining the site's Green Belt contribution as the Council has done in respect of this site is procedurally flawed. This should be corrected through a further iteration of the Green Belt Assessment.
- 4.32 Further, in contrast to site allocation OS1, the extent of the site's interface with the wider Green Belt is limited. It is substantially contained by the existing urban area and durable boundaries to the south, east and west. This accounts for approximately 44% of the site's perimeter (c. 757m).
- 4.33 Its interface with the Green Belt along non-durable lines is only c. 1,000m (56% of its perimeter). This contrasts with site allocation OS1 where the site's boundary with the Green Belt along non-durable lines accounts for 79% of its perimeter.
- 4.34 For these reasons, Peel considers that land at Lady Lane makes a weak contribution to Green Belt Purpose 3 and, in accordance with the Council's methodology, an overall weak contribution to the Green Belt.

Potential contamination

- 4.35 The Council's site assessment pro-forma refers to "*known abnormal costs due to potentially contaminated land in the south east corner of the site. This will either need remediating or development should avoid that part of the site*".
- 4.36 It is not clear where the Council's information or this conclusion has originated from.
- 4.37 A Preliminary Site Appraisal, including a desk-based review of historical data, geological mapping and environmental site sensitivity information, has been undertaken by SGI and is provided within the technical appendix to the Development Prospectus for the site. The appraisal confirms that no significant sources of contamination have been identified at the site or within the immediate locality that would prejudice the future development of the site.

Access

- 4.38 The Council's site appraisal pro-forma records that there are access constraints to the site, noting that Chadwick Avenue to the south may be capable of supporting a 'limited' number of dwellings and that third party land would be required to deliver an access off Abbey Close to the west.
- 4.39 As noted above, Peel has presented an alternative proposal for the site to demonstrate how a smaller number of dwellings could be delivered during the plan period, with the balance of the site safeguarded to meet longer term development needs beyond the plan period as required.
- 4.40 In the context of this phasing approach, the south easternmost parcel of the site would be developed during the plan period, with a capacity of approximately 83 dwellings

and served exclusively off Chadwick Avenue. This is shown within the updated Development Prospectus as submitted with Peel's representations to the PUSLP.

- 4.41 Chadwick Avenue is a 5.5 m wide residential road with footpaths either side. It is similar in character and size to Deacons Close which is proposed to be relied upon to provide access into allocation OS1 (75 units). As detailed above, Peel proposes that the Lady Lane site be allocated to deliver 83 residential units during the plan period with the balance as safeguarded to potentially meet development needs beyond. Chadwick Avenue provides a suitable form of access for 83 units and the Council's adverse conclusions to the contrary cannot be upheld.
- 4.42 Moreover, the site provides the opportunity to provide a second access off Lady Lane to the east of the site. Whilst this is narrow in places, it is sufficient in width to serve a limited number of dwellings and may be capable of being widened along a short section if needed. This may serve vehicles only with pedestrians accessing the site via Chadwick Avenue and the Public Right of Way which enters the site at Abbey Close. Lady Lane would also provide a suitable access into the area of safeguarded land, if developed beyond the plan period and if it were determined that Chadwick Avenue, on its own, did not provide a suitable access point.

Ecology

- 4.43 The Council's site assessment pro-forma notes that the site '*contains a locally important site not suitable for biodiversity offsetting – the south western section of the site is designated as a Local Wildlife Site.*' It is given a **red** score against this measure of suitability.
- 4.44 Whilst noting this, Peel does not agree with the score given by the Council. This matter affects a defined area of land located to the south west of the site which Peel is not proposing for inclusion within the development and safeguarded allocation, though this land may be subject to a consequential Green Belt release. Beyond this specific area, the wider site comprises open agricultural land which is of very limited ecological value, as supported by the Ecological Appraisal submitted as part of the technical evidence base presented alongside the Development Prospectus for this site.
- 4.45 The orientation and location of the Local Wildlife Site means that a scheme can be delivered which works effectively around this constraint and locates development in areas which will protect its ecological value, as shown on the conceptual masterplan for the site presented in the accompanying Development Prospectus.
- 4.46 This opportunity should be recognised in the Council's site appraisal process and the site scored on the basis that this does not present a critical constraint to the site. It should be scored **yellow**.

A long-term development opportunity

- 4.47 Peel's proposal provides the benefit of providing a strategy for the long-term planned and managed growth of the settlement, through an initial plan period development and then a natural and logical second phase of development beyond the plan period utilising land to west. This reflects the need for the Outlying Settlements to accommodate safeguarded land to meet development requirements beyond the plan period (see Paper 2 of Peel's submission).

- 4.48 In this context there are significant advantages to locating safeguarded land where it can build on and be planned as part of plan period releases, thus reducing the number of separate Green Belt releases in the settlement and avoiding a piecemeal approach to its long-term growth. Candidate Green Belt releases need to be considered in this context.
- 4.49 That Peel's site lends itself to this comprehensive approach is a significant advantage over other potential Green Belt releases where no such opportunity beyond the plan period exists without breaching durable Green Belt boundaries and releasing more sensitive Green Belt land.
- 4.50 The proposed PUSLP allocation does not present an equivalent opportunity to build on the existing development in a sustainable manner. The further outward expansion of allocation OS1 would take in open Green Belt land and reinforce the development's physical disconnection and isolation from the main settlement area.
- 4.51 It is important to have full regard to these benefits in considering Peel's proposal against other candidate site allocations.

Revised site scoring

- 4.52 Taking the above comments into account, the table at Appendix 7 presents a comparison of the relative suitability scoring of the Council's proposed allocation (OS1) against Peel's proposal for land off Lady Lane.
- 4.53 In addition to, and reflecting the comments provided, a consideration of Green Belt harm should also be included in the suitability assessment. This is a critical consideration in providing a fully rounded view on the relative suitability of contender sites. In respect of these items, the following scoring should be given to the sites assessed above:
- Site allocation OS1: **Red** reflecting a strong Green Belt contribution
 - Land off Lady Lane: **yellow** reflecting a weak Green Belt contribution
- 4.54 Based on the revised scoring presented at Appendix 7 and taking Green Belt contribution into account in the suitability assessment, it is demonstrated that the proposed site at Lady Lane would, in overall terms, achieve a better suitability score than allocation OS1. It would achieve a better score in respect of **three** grounds and a worse score in respect of **two** grounds.
- 4.55 Both sites are noted as having **green** availability score within the Council's appraisal.
- 4.56 The land at Lady Lane should be given a **green** achievability score reflecting comments above.
- 4.57 In applying the criteria set out within the Council's appraisal framework, plus bringing Green Belt harm into the consideration of suitability for the reasons outlined, it is evident that the proposed site off Lady Lane as promoted by Peel would, in overall

terms, represent the most suitable and most sustainable when compared against the site selected for allocation in the PUSLP.

- 4.58 The additional benefit of the site at Lady Lane in presenting a long-term development opportunity and its ability to meet needs beyond the plan period thus avoiding the piecemeal future expansion of the settlement further weighs substantially in favour of the proposed allocation of Peel's site.

Croft – conclusions and amendments needed to correct soundness

4.59 The assessment above has demonstrated that:

- 1) The Council has understated the Green Belt contribution made by the site it has selected for allocation to the north east of Croft. This site should be recorded as making a strong rather than weak overall contribution to the Green Belt.
- 2) The Council has overstated the Green Belt contribution made by the site at Lady Lane as promoted by Peel. This site should be recorded as making a weak rather than moderate overall Green Belt contribution.
- 3) The Council has overstated the extent of brownfield land at the proposed allocated site north east of Croft. This accounts for approximately 25% of the site area. The site is therefore predominantly greenfield and should be recorded as such within the Council's site appraisal.
- 4) The proposed allocation north east of Croft is affected by access constraints with no sufficiently proven means of providing vehicular access into the site. This brings into significant question the deliverability of the scheme over the plan period. The Council's site appraisal should reflect this.
- 5) The Council has overstated the ecological constraints to Peel's promoted site at Lady Lane and failed to recognise that any such scheme can be designed to avoid potential habitats. The Council's site appraisal should reflect that a scheme can be delivered to work around this constraint.
- 6) An adequate site access off Chadwick Avenue can be provided to enable a c.83 unit development to be delivered on part of the site at Lady Lane, with no access constraints to the further expansion of the site beyond the plan period. There are no access constraints to the site's development during the plan-period therefore. The Council's appraisal should reflect this position.
- 7) No significant sources of contamination have been identified at the site or within the immediate locality that would prejudice the future development of the site.
- 8) Peel's site presents the potential for the allocation of safeguarded land to meet the long-term (beyond the plan period) development needs of Croft in light of the issues raised within Paper 1 of Peel's submission on this matter. A strategy for the long-term, planned and managed growth of Croft is presented through Peel's proposal, preventing the need for an unsustainable piecemeal approach to the release of Green Belt land to meet the settlement's long-term needs

- 4.60 The cumulative effect of the above is that the proposed part allocation of land at Lady Lane would achieve a better suitability score as the selected allocation.
- 4.61 Accordingly, it is concluded that the site proposed by Peel at Lady Lane represents a more sustainable site than the selected allocation to the north east of Croft (site allocation OS1).
- 4.62 Peel contends that the Council's failure to reach this conclusion results from a flawed appraisal process and therefore a deficient evidence base. The selected site allocation cannot be justified and this aspect of the PUSLP is unsound as a result. The allocation of land at Lady Lane for part development during the plan period and part safeguarding to meet development needs beyond the plan period would correct this specific point of unsoundness.

5. Outlying Settlement 3: Hollins Green

Summary

The PUSLP proposes to release land to the south west of Hollins Green for residential development of 90 dwellings (Policy OS3).

Peel has historically promoted an alternative site located off Manchester Road, Hollins Green for residential development with a capacity of approximately 300 dwellings. An alternative iteration of Peel's proposal was presented in the PSLP representations showing how its site off Manchester Road could be released to deliver a lower level of development during the plan period (c. 93 units) with the balance designated as safeguarded land to meet requirements beyond the current plan period (with a total capacity for 205 dwellings). The proposed approach is fundamentally unchanged.

This allows Peel's site to be assessed against the proposed allocation on a more equal and comparable basis and to demonstrate that Peel's proposal represents a suitable and sustainable alternative which can be delivered in the context of the PUSLP strategy of 'incremental growth' within Hollins Green.

Peel's proposal provides the added benefit of making provision for contributing to meeting the development needs of Hollins Green both during and beyond the current plan period, including through a safeguarded land designation covering part of the site.

Hollins Green's development requirement would be more sustainably met through the release of land off Manchester Road as proposed by Peel. Site Allocation OS3 would not represent the most sustainable site option in this regard, with greater harmful effects than the alternative proposed by Peel. The selection of this site is unsound.

Introduction

- 5.1 The PUSLP proposes a single Green Belt release in Hollins Green – land to the southwest of Hollins Green (Policy OS3) with an assumed site capacity of 90 dwellings. This reflects the proposed strategy of 'incremental growth' within Hollins Green and the other Outlying Settlements of the Borough.
- 5.2 Peel has historically promoted an alternative site located off Manchester Road, Hollins Green for residential development with a capacity of approximately 300 dwellings. A detailed Development Prospectus, including site masterplan, was submitted as part of Peel's representations to the PDO consultation in 2017 along with a technical evidence base to demonstrate the deliverability of the site and how the scheme could respond to potential site constraints, including heritage and ecological issues. That Development Prospectus and the technical evidence base were updated and accompanied Peel's representations to the PSLP. This showed how its site off Manchester Road could be released to deliver a lower level of development during the

plan period (93 units) than that proposed at PDO stage, with the balance designated as safeguarded land to meet requirements beyond the current plan period (with a capacity for 205 dwellings).

- 5.3 A further update of both has been undertaken to accompany these representations to reflect changes in policy and the evidence base; Peel's proposals and the conclusions of the technical assessments are fundamentally unchanged.
- 5.4 The phased approach has been taken to enable Peel's proposal, more commensurate in scale to the size of the settlement and the level of development proposed within it through the PUSLP, to be considered. This allows Peel's site to be assessed against the proposed allocation on a more equal and comparable basis and to demonstrate that Peel's proposal represents a suitable and sustainable alternative which can be delivered in the context of the PUSLP strategy of 'incremental growth' within Hollins Green.
- 5.5 The plan at Appendix 4 therefore shows how the site promoted by Peel could be developed in two phases during and beyond the plan period as proposed. For completeness, the Development Prospectus also shows how the combined site could be delivered to provide a total of 205 dwellings across two plan periods.
- 5.6 In this context, Peel's proposal provides the added benefit of making provision for contributing to meeting the development needs of Hollins Green both during and beyond the current plan period, including through a safeguarded land designation covering part of the site. A need to make provision for safeguarded land to meet development needs beyond the plan period exists (see Paper 1). Peel's proposal must be considered in this context.
- 5.7 The following paragraphs provide comments on the site selected for allocation through the PUSLP followed by a presentation of Peel's site and the reasons why it would present a more appropriate and sustainable allocation.
- 5.8 The comments focus principally on the Council's appraisal of each site as presented within the Site Assessment Pro-formas report published alongside the PSLP. It is noted that candidate sites, including land at Manchester Road, are also assessed through the PUSLP Sustainability Appraisal, though the appraisal framework and scoring system presented in Site Assessment Pro-formas report replicates that of the Sustainability Appraisal. The results within the Sustainability Appraisal and Site Assessment Pro-formas report as presented are also consistent.

Site allocation OS3: Land to the south west of Hollins Green

- 5.9 The above site is proposed for allocation in the PUSLP with an assumed capacity of approximately 90 dwellings.

Green Belt

- 5.10 The site has been considered through the Council's Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) (2017). This identifies that the site makes a moderate overall contribution to the Green Belt. However it forms part of a larger defined Green Belt Parcel (HG6) which is identified as

making an overall strong contribution to the Green Belt through the 2016 Green Belt Assessment. The proposed allocation comprises the eastern part of Parcel H6 and accounts for approximately 50% of the parcel area.

- 5.11 Given the findings of the 2016 Green Belt Assessment, Peel does not agree that the proposed allocated site makes only a moderate contribution to the Green Belt. The site's southern boundary comprises a watercourse (Marsh Brook) whilst its western boundary is formed by field boundaries and a small residential development (washed over by the Green Belt). These are evidently non-durable boundaries in accordance with Council's own criteria as set out in the 2016 Green Belt Assessment. The weakness of these boundaries is also recognised within the Green Belt Implications Assessment which states that these would need to be strengthened.
- 5.12 The land to the west of the site comprises the balance of Green Belt Parcel HG6 which, as noted above, is deemed to make an overall strong contribution to the Green Belt. Given the non-durable boundary shared with the rest of Parcel H6, it follows that there is a significant risk of the outward spread of development into the wider parcel (one which itself makes a 'strong' Green Belt contribution) as a result of the site's release from the Green Belt.
- 5.13 The site cannot be readily disconnected from its wider Green Belt parcel context and in the absence of durable shared boundaries with the wider parcel, drawing on the Council's own evidence, a conclusion that the site makes a moderate Green Belt contribution cannot be substantiated.
- 5.14 Reflecting the above, and the fact that the site forms approximately 50% of Parcel HG6 (which makes a strong contribution to the Green Belt) it is Peel's view that the site makes a strong contribution to the Green Belt. This should be carried forward into the site appraisal and given due weight in the process of selecting sites for allocation.

Peel's proposal – land of Manchester Road

- 5.15 The plan at **Appendix 4** illustrates how Peel's land at Manchester Road could be developed in two phases, with Phase 1 being delivered during the plan period providing approximately 93 dwellings, and Phase 2 being designated as safeguarded land with capacity for 112 units.
- 5.16 This Paper shows how Peel's site is preferable to the proposed draft allocation and can provide safeguarded land for the future.
- 5.17 The Council has considered the full site area - Phases 1 and 2 as proposed by Peel - as a potential allocation for development. It gives the site an overall **yellow** score in respect of its suitability, an **amber** score in respect of its achievability and a **green** score in respect of availability. Comments on key aspects of the appraisal are presented below.

Green Belt

- 5.18 It is noted that the Council has determined that the site makes an overall weak Green Belt contribution. Peel would agree with this conclusion. For the reasons outlined in section 2, this Green Belt contribution should be given due weight in the assessment of site's suitability for allocation.

- 5.19 The long-term endurance of the Green Belt is a strategic matter for the PUSLP, reflected in Objective W2. Accordingly, in the comparative appraisal of sites, it is necessary to ensure that Green Belt contribution is given significant weight (not just equal weight to other matters of less strategic importance) as part of the balanced assessment of options. Sites which make a weak Green Belt contribution (such as land at Manchester Road) should be favoured where possible.

Abnormal constraints

- 5.20 The Council's **amber** score given to the site in respect of its achievability is based on the site being located within the buffer zone of a former landfill and potentially being affected by adjacent contaminated uses.
- 5.21 The ground conditions Pre-Appraisal undertaken by SGI (and provided within the technical appendix to the Development Prospectus) confirms that the closest recorded landfill site is a historic landfill located c. 195m east of the site. However, that landfill is not considered to present an issue to human health given the Manchester Ship Canal bisects the lateral migration pathway. A further historic landfill is located c. 200m north of the site boundary; however, given the distance from the Peel proposal, the risk from hazardous ground gases is considered to be low. In this context, the appraisal concludes that no significant sources of contamination have been identified at the site or within the immediate locality that would pose a significant risk to human health or prejudice the future development of the site.
- 5.22 The site should be given a **yellow** score in this respect.

Air Quality

- 5.23 The Council's assessment notes that the site is located within 1km of an Air Quality Management Area. It scores the site **amber** in respect of this matter.
- 5.24 The AQMA in question is located in Salford to the east of the site and terminates where Liverpool Road meets Cadishead Way at authority's boundary with Warrington. Whilst the site is technically within 1km of this, this only applies to the north eastern part of the site and the difference in proximity to the AQMA between Peel's site and land to the south west of Hollins Green is negligible (a matter of metres). It would be misleading to give the sites different scores in this regard (noting that land to the south west of Hollins Green is given a **yellow** score in respect of this matter being marginally more than 1km from the AQMA).
- 5.25 The site should be given the same score of **yellow** against this matter therefore.

Agricultural land

- 5.26 The Council's site assessment pro-forma records that the site:
- "Contains more than 10 hectares of agricultural land class 1-2 or a total of 20 hectares 1-3"*
- 5.27 The site is given an **amber** score in respect of this matter therefore.
- 5.28 Alongside the submission of the Development Prospectus for the site, Peel has submitted an extensive technical evidence base to support its masterplan proposals.

This includes a Protected Agricultural Land Classification assessment produced by Reading Agricultural. This demonstrates that the site provides up to 5.6 ha of Grade 3A agricultural land and no Grade 1 or 2 agricultural land. The balance of the site (6.1 ha) comprises Grade 3b agricultural land. Only Grade 1, 2 and 3a is classed as Best and Most Versatile agricultural land. Accordingly significantly less than 10ha is classed as Best and Most Versatile agricultural land, contrary to the Council's suggestion.

5.29 The site should be given a **yellow** score in respect of this matter therefore.

Townscape, landscape and visual appraisal

5.30 Randall Thorp has undertaken a Landscape, Townscape and Visual Sensitivity Assessment and Development Appraisal of Peel's proposal at Manchester Road submitted alongside the Development Prospectus for the site. That appraisal concludes that:

"There is no reason why a well-designed development, that preserves the existing landscape features, provides a green infrastructure network and responds sensitively to the setting of the existing landscape features of the site, would have any significant effects on the character and townscape of the surrounding landscape."

5.31 With appropriate good design and well thought out landscape mitigation measures, it would be readily possible to develop the site whilst avoiding any potentially significant effects on the visual amenity of the surrounding receptors, including public rights of way surrounding the site and existing residential properties. In particular:

- The landscape sensitivity of the site and its surroundings it considered to be Medium – Low. The site itself lies within the Landscape Character Area 1C Winwick, Culcheth, Glazebrook and Rixton and is agricultural land with a lower landscape value and sensitivity than the surrounding floodplain landscape.
- The landscape comprises a mix of land uses including the residential area of Hollins Green, a caravan park, some large industrial units and the Ship Canal. Development within this area would be in keeping with the surrounding land uses.
- Access to the site would be from the A57; which is urban in its character and access roads into pockets of development are not at odds with the journey experienced along this route.
- The dense vegetation to the north western boundary of the site would filter views of development from the A57. This existing vegetation can be maintained and enhanced through development of the site.
- The existing landscape structure of the site can be preserved and enhanced through the retention of existing features such as trees, woodlands, hedgerows and watercourses, the incorporation of a landscape buffer to the A57 Manchester Road and new woodland screening to create an attractive landscape setting and enhanced green infrastructure.

- There is an opportunity to create a network of new footpaths and cycle routes to enhance recreational value and improve wildlife connectivity; linking Hollins Green through the site to the locally walked route along the Manchester Ship Canal.

A long-term development opportunity

- 5.32 Peel's proposal provides the benefit of providing a strategy for the long-term planned and managed growth of the settlement, through an initial plan period development and then a natural and logical second phase of development beyond the plan period utilising land to west. This reflects the need for the Outlying Settlements to accommodate safeguarded land to meet development requirements beyond the plan period (see Paper 1 of Peel's submission).
- 5.33 In this context there are significant advantages to locating safeguarded land where it can build on and be planned as part of plan period releases, thus reducing the number of separate Green Belt releases in the settlement and avoiding a piecemeal approach to its long-term growth. Candidate Green Belt releases need to be considered in this context.
- 5.34 That Peel's site lends itself to this comprehensive approach is a significant advantage over other potential Green Belt releases where no such opportunity beyond the plan period exists without breaching durable Green Belt boundaries and releasing more sensitive Green Belt land.
- 5.35 The proposed PUSLP allocation does not present an equivalent opportunity to build on the existing development in a sustainable manner. The further outward expansion of allocation OS3 would take in open Green Belt land, including land which is deemed to make a strong Green Belt contribution, and reinforce the development's physical disconnection and isolation from the main settlement area.
- 5.36 It is important to have full regard to these benefits in considering Peel's proposal against other candidate site allocations.

Revised site scoring

- 5.37 Taking the above comments into account, the table at Appendix 7 presents a comparison of the relative suitability scoring of the Council's proposed allocation (OS4) against Peel's proposal for land off Manchester Road.
- 5.38 In addition to, and reflecting the comments provided, a consideration of Green Belt harm should also be included in the suitability assessment. This is a critical consideration in providing a fully rounded view on the relative suitability of contender sites. In respect of these items, the following scoring should be given to the sites assessed above:
- Site allocation OS3: **Amber** reflecting a strong Green Belt contribution
 - Land off Manchester Road: **Yellow** reflecting a weak Green Belt contribution

- 5.39 Based on the revised scoring presented at Appendix 7 and taking Green Belt contribution into account in the suitability assessment, it is demonstrated that Peel's proposed site at Manchester Road would, in overall terms, achieve a better suitability score than allocation OS3. It would achieve a better score in respect of **two** grounds and a worse score in respect of **one** ground.
- 5.40 It is accepted that both sites would have a **green** availability score, consistent with the Council's appraisal.
- 5.41 The land at Manchester Road should be given a **green** achievability score reflecting comments above. It is accepted that Site OS3 should also be given a **green** achievability score in accordance with the Council's assessment.
- 5.42 The additional benefits of the site at Manchester Road in presenting a long-term development opportunity and its ability to meet needs beyond the plan period, thus avoiding a piecemeal future expansion of the settlement also weighs substantially in favour of the proposed allocation of Peel's land.

Weighting of suitability indicators

- 5.43 Notwithstanding the above, it is important to highlight that the long-term endurance of the Green Belt is a strategic matter for the PUSLP, reflected in Objective W2. Accordingly in the comparative appraisal of sites it is necessary to ensure that Green Belt contribution is given significant weight (not just equal weight to other matters of less strategic importance) as part of the balanced assessment of options. Sites which make a weak Green Belt contribution (such as Peel's site at Manchester Road) should be favoured where possible. This weighs further in favour of the allocation of Peel's site over others selected within Hollins Green.
- 5.44 The assessment has therefore demonstrated that Peel's proposal at Manchester Road would represent a substantially more sustainable allocation than that selected by the Council in the context of the development requirements for Hollins Green remaining as articulated through the PUSLP.

Hollins Green – conclusions and amendments needed to correct soundness

- 5.45 The assessment above has demonstrated that:
- 1) The Council has failed to give due weight to the level of Green Belt harm in selecting the draft site for allocation in Hollins Green. The process of site selection is procedurally flawed therefore.
 - 2) The Council has understated the Green Belt contribution made by the site it has selected for allocation to the south west of Hollins Green. This site should be recorded as making a strong rather than moderate contribution to the Green Belt.
 - 3) The Council's conclusions regarding the achievability of land at Manchester Road are unsubstantiated. Its judgements regarding the implications of the site's location in relation to contaminated uses are flawed. These constraints can be

readily addressed through the scheme design and development. The site is achievable and should be recorded as such.

- 4) The Council's conclusions regarding agricultural land quality in respect of land at Manchester Road are flawed. The site should be given a **yellow** score in respect of this matter.
 - 5) The Council's conclusions regarding air quality in respect of land at Manchester Road are flawed. The site should be given a **yellow** score in respect of this matter.
- 5.46 The cumulative effect of points 3 to 5 is that Peel's land at Manchester Road would generally be given the same scoring as the selected allocation. However, in Green Belt impact terms, Peel's site would be overwhelmingly more sustainable and less damaging to the Green Belt and its long-term integrity.
- 5.47 Green Belt harm must be given significant weight in the process of selecting sites. Ensuring the Green Belt endures over the long-term is a strategic objective for the PUSLP (Objective W2) and thus allocation options which support that must be favoured. Green Belt contribution should be given substantial weight.
- 5.48 Elsewhere within this representation we have criticised the Council's approach for immediately discounting sites which make a strong Green Belt contribution from the appraisal process. Whilst Green Belt harm should not be allowed to dictate the whole process of site selection, as noted above it is a vitally important consideration reflecting the priority given to protecting Green Belt land in the NPPF and indeed in the PUSLP. Where there is a material difference in Green Belt contribution between sites being considered for allocation, this must be given very significant weight in the process.
- 5.49 Accordingly, and in applying an appropriate level of weight to Green Belt harm in the appraisal process, it is concluded that Peel's proposed site at Manchester Road represents a more sustainable site than the selected allocation to the south west of Hollins Green.
- 5.50 Peel contends that the Council's failure to reach this conclusion results from a flawed appraisal process and therefore a deficient evidence base. The selected site allocation cannot be justified and this aspect of the PUSLP is unsound as a result. The allocation of Peel's land at Manchester Road for part development during the plan period and part safeguarding to meet development needs beyond the plan period would correct this specific point of unsoundness.

6. Outlying Settlement 4: Lymm

Summary

The PUSLP proposes two Green Belt releases in Lymm with an assumed cumulative development capacity of 306 dwellings.

Peel has historically promoted the allocation of a single development site located off Rushgreen Road (corresponding with Green Belt Parcel LY16 as defined through the Council's Green Belt Assessment) with the potential to provide approximately 500 residential dwellings, plus an extension to the existing Oughtrington Primary School. Peel reconsidered its proposals for the area at PSLP stage following a fuller assessment of its constraints and opportunities and has presented an alternative strategy for the release of land in this location. Peel's proposal included the release of land located within the north eastern part of the site previously promoted (land to the east of Tanyard Farm) for development during the plan period and with a capacity to accommodate c. 115 dwellings. This remains part of the proposal along with community health facilities.

Land to the south of this up to the Bridgewater Canal is also proposed for release from the Green Belt by Peel to be either designated as a Green Wedge, or similar, if it were deemed necessary to retain an area of open land in this location. Open land uses comprising community sports facilities, informal open space and open tourism / leisure uses are proposed within the southern area. It is able to offer significant additional benefits for existing and future residents that the other sites are not capable of delivering.

Land immediately to the west of the site proposed for release and development by Peel benefits from planning permission for 64 dwellings granted at appeal and is being built out. This changes the relationship of Peel's proposed allocation with the settlement boundary. Therefore Peel proposes that the land to the east of the appeal site, rather than land to the west, represents a logical approach to allocation.

Peel's assessment goes on to demonstrate that the allocation of land within the defined Green Belt Parcel LY16 should be prioritised over other locations in Lymm when considered on an objective basis. As noted above, within this context, Peel's proposed site to the east of Tanyard Farm should be the starting point for the selection of land for release within this Green Belt parcel.

Lymm's development requirement would be more sustainably met through the release of land at Rushgreen Road (east of Tanyard Farm) as proposed by Peel. Site Allocation OS4 particularly would not represent the most sustainable site options in this regard, with greater harmful effects than the alternative proposed by Peel. The selection of these sites in favour of land proposed by Peel is unsound.

Introduction

- 6.1 The PUSLP proposes a series of Green Belt releases in Lymm with an assumed minimum cumulative development capacity of 306 dwellings (allocations OS4 (formerly

OS6 and OS8) and OS5). This reflects the selected strategy of incremental growth within the Outlying Settlements.

- 6.2 A site previously proposed for allocation in the PSLP (Site OS5 : Massey Brook Lane) has been omitted from the PUSLP due to the land owners withdrawing from the Local Plan process thus no longer being available.
- 6.3 Peel has historically promoted the allocation of a single development site located off Rushgreen Road with the potential to provide approximately 500 residential dwellings, plus an extension to the existing Oughtrington Primary School. A detailed Development Prospectus and associated technical evidence base has been submitted to previous Local Plan consultations in 2016 and 2017. That Development Prospectus and the technical evidence base were updated to accompany Peel's representations to the PSLP.
- 6.4 Peel's proposals form part of Green Belt Parcel LY16 defined as part of the Council's 2016 Green Belt Assessment. Peel had historically promoted the full release of this parcel of land for development. It reconsidered its proposals for the area occupied by Green Belt Parcel LY16 at PSLP stage following a fuller assessment of its constraints and opportunities and presented an alternative strategy for the release of land in this location. This involved the release of land located within the north eastern part of the parcel (land to the east of Tanyard Farm) for development during the plan period and with a capacity to accommodate c.115 dwellings.
- 6.5 Land to the south of this up to the Bridgewater Canal was also proposed for release from the Green Belt by Peel to be either designated as a Green Wedge, or similar, if it were deemed necessary to retain an area of open land in this location, or allocated as safeguarded land to meet development needs beyond the plan period.
- 6.6 Peel's proposals still involve c.115 dwellings within the north eastern part of the parcel; provision is also to be made for community health facilities. The remainder of the site will be used to accommodate community sports facilities, informal open space and open tourism / leisure uses.
- 6.7 Land immediately to the west of the site proposed for release and development by Peel benefits from planning permission for 64 dwellings granted at appeal (see below). The development of the appeal site has started and changes the relationship of Peel's proposed allocation with the settlement boundary. However, Peel proposes that, the land to the east of the appeal site, rather than land to the west, represents a logical approach to allocation.
- 6.8 In contrast, the Council proposes an allocation (Site Allocation OS5) within Parcel LY16 which comprises land to the west of the appeal development. A further allocation (OS4 – Pool Lane / Warrington Road) is proposed on the western edge of Lymm. It comprises two parcels of land to the north and south of Warrington Road.
- 6.9 The technical evidence base submitted with the Development Prospectus for Peel's proposal assesses, in some cases, a larger proposal relating to a larger area of land. A robust approach to the technical assessment of the site and its deliverability has therefore been taken.

The case for an amended approach to Parcel LY16

- 6.10 Peel's proposal for Green Belt Parcel LY16 is illustrated through the plan at Appendix 6.
- 6.11 Parcel LY16 is physically well contained by the Bridgewater Canal along its southern boundary and residential development along the majority of the rest of its boundaries. This area has limited visibility from public viewpoints, with the exception of the very westernmost part of the parcel which has a limited interface with Rushgreen Road and where the residential development between the area of Green Belt and the Rushgreen Road is generally sparse.
- 6.12 Peel has considered the parcel on a comprehensive basis. Most importantly Peel's revised proposal as presented reflects and pays due regard to the findings of the Planning Inspector in respect of allowed appeal reference APP/M0655/W/18/3200416. This proposal has a material influence on the sensitivity and visual prominence of different areas of the parcel, including the character of the parcel, the extent of development within it and the extent to which it continues to provide a green gap separating Lymm and Oughtrington
- 6.13 The appeal decision notes the value of maintaining an area of open land to the south of this development between its southern edge and the Bridgewater Canal in retaining a green gap between Lymm and Oughtrington:
- "The Bridgewater Canal runs through this green wedge. The proposed development would be a more concentrated and suburban form of development than currently exists on the site and its overall mass and bulk would extend further south. However, the new housing would be visually contained by existing landscape features. In addition, the appeal proposal would provide an opportunity to rationalise development over the whole of the site and secure a corridor of open space between the proposed housing development and the Canal. The proposed open space, which includes PDL, would be accessible to the public and visually and ecologically enhanced. **Moreover, this swathe of open space would remain permanently open, and a gap between Oughtrington and Lymm would be maintained.**" [emphasis added]*
- 6.14 The appeal therefore permits the development only of the northern part of the site.
- 6.15 Peel's approach to Green Belt Parcel LY16 follows the same principle in also proposing the retention of a similar area of open land to the north of the canal achieving the same end. It thus reflects the approach advocated by the Inspector.
- 6.16 The land to the south of Peel's proposed plan period allocation would not perform a valid Green Belt function in the context of the development of land to the north given the resultant limited gap between the southern edge of the proposed development and the Bridgewater Canal. Thus Peel proposes that this land would be subject to a consequential Green Belt release, albeit maintaining this land in an open form secured through a Green Wedge policy designation. Peel does not object to such a designation.
- 6.17 To the extent that it may be beneficial to retain an open area within Parcel LY16 in this location, creating such a gap between the canal and the southern extent of development is the most effective way of achieving this, representing a continuation of

the principle established through the aforementioned appeal proposal. Further releases must be considered against this baseline.

- 6.18 In stark contrast, the proposed PUSLP allocation OS5 conflicts with these principles in designating land for development up to the canal. The associated policy is generally permissive of development up to the canal, subject to appropriate landscape treatment, thus offending the principle established through the determination of the appeal.
- 6.19 Whilst in overall terms, Parcel LY16 is considered to be a suitable location for development, in the context of this parcel, land to the west of the appeal site would be more sensitive to development being more prominent and visible.
- 6.20 In this context, the first preferred area of Green Belt release would be land to immediate east of the appeal site. Development here would 'tuck in' behind the appeal development utilising an area of 'backland' which is not generally visible from public view points. From a Green Belt point of view and the separate point of the desirability of retaining separate identity of sub parts of settlements in this location, the site proposed for release by Peel would be the least sensitive. Its development would follow the principle recently established on appeal.
- 6.21 Further, the site proposed for release and development by Peel cannot have any effect in reducing any existing gap between built up areas in this location given the presence of the appeal scheme located between it and the built-up area of Lymm. The appeal scheme effectively acts as a barrier to the encroachment of development further west in this regard.
- 6.22 Accordingly, whilst it may be appropriate to release the full extent of Parcel LY16 from the Green Belt, noting that it makes a weak contribution to the Green Belt based on the Council's 2017 Green Belt Assessment Addendum, if there were a requirement only to release some land in this location in the context of the housing requirement for Lymm, the appeal site and land to east of the appeal scheme would be the logical starting point and the sequentially most preferable. In this regard, Peel's proposal should be prioritised over the Council's selection of land to the east of the appeal scheme. This is articulated through the plan at Appendix 6.

Assessment of other sites

- 6.23 It is Peel's position that its proposal as presented at Appendix 6 represents a more sustainable and sensitive approach to the release of land within Green Belt Parcel LY16. The site proposed by Peel should be prioritised in favour of allocation OS5 as defined by the Council.
- 6.24 Notwithstanding this, it is also instructive to highlight that insofar as it has been assessed as potential area for development, Parcel LY16, considered as a whole, would perform favourably when compared against the other site selected for allocation in Lymm. In this regard, Parcel LY16 as a whole should be established as the first priority location for growth within Lymm therefore. In this context, and as proven above, Peel's site is evidently the sequentially most preferable site for release within the parcel if it were deemed appropriate to release only part of it for development.

- 6.25 The remainder of the comments below focus principally on the Council's appraisal of the other site selected for allocation (site OS4) as presented within the Site Assessment Pro-formas report before presenting a comparative assessment of Parcel LY16 as a single potential development site assessed by the Council.
- 6.26 It is noted that site is also assessed through the Sustainability Appraisal, though the appraisal framework and scoring system presented in Site Assessment Proformas report replicates that of the Sustainability Appraisal. The results within the Sustainability Appraisal and Site Assessment Pro-formas report as presented are also consistent.

Policy OS4: Lymm (Pool Lane / Warrington Road)

- 6.27 Site OS4 comprises two parcels of land located to the north and south Warrington Road to the north west of the settlement. Both parcels have been assessed by the Council – site references 1528 / R18/162 and 1531 / R18/163 respectively, within the Site Proformas report. In both cases a slightly larger site was assessed than has been proposed for allocation.

Pool Lane

Sustainability of the location and relationship with the settlement

- 6.28 The site appraisal assesses the site on the basis of whether it meets stipulated distance standards in relation to schools, employment areas, health care facilities and community facilities, many of which may be standalone facilities with no prospect for promoting linked trips. Whilst the Council has identified that the site generally meets minimum accessibility criteria when measured on a quantified basis it is misleading not to consider the actual relationship with facilities and Lymm centre in the site appraisal process.
- 6.29 Given that the centre of Lymm is a strong and vibrant centre with a wide range of services, the greatest prospect for promoting sustainable transport choices is through locating development close to the centre. However, the distance to the main centre of Lymm (approximately 1.7km from the centre of the site) is beyond reasonable walking distance.
- 6.30 Furthermore, the site's relationship with the centre of Lymm and the nature of accessibility to the centre is of a poor quality which would require the use of a narrow footway along the northern side of Warrington Road (with limited opportunity to widen and improve). It is therefore apparent that it does not have a clear and integral relationship with the facilities within the settlement. Its relationship with the settlement is reflective of its peripheral location. This brings into question the general sustainability and suitability of this location.
- 6.31 The flaw in this approach is particularly relevant in Lymm where the strength of and offer within the centre provides genuine opportunities to promote non-car journeys and linked trips as noted. Other sites considered for allocation have a much better relationship with the centre in this regard and it would be inappropriate not to give this due weight in considering the sustainability of site options. This matter is considered further in respect of other sites below.

Flood risk

- 6.32 It is noted that the site is located entirely within Environment Agency Flood Zones 2 and 3. There are alternative sites available which are located outside of Flood Zones 2 and 3. The sequential test in NPPF is not met. This should result in the site being discounted at the outset. There are alternative sites that are not so constrained by flooding; notably the Peel site. In accordance with NPPF (paragraph 161 and 162) this site should not be allocated.

Warrington Road

Green Belt

- 6.33 The Council has concluded that the site makes an overall moderate Green Belt contribution, including a strong contribution in respect of Purpose 3 (to assist in safeguarding the countryside from encroachment). The overall moderate score reflects a 'professional judgement' exercise in accordance with the methodology employed, noting that some sites with the same contribution against each purpose are deemed to make a strong overall contribution.
- 6.34 Whilst an overall moderate contribution has been identified, it should be highlighted that the contribution made to individual purposes are such that an overall score of strong may have been justified, and indeed has been proposed in respect of a number of other sites which have the same scoring profile when applying the 'professional judgement' input. The overall scoring of moderate is marginal therefore and must be seen in the context of a strong contribution against purpose 3 and moderate contribution to purpose 5. The justification offered for this overall conclusion is flawed, with the presence of the M6 motorway c.300m to the west referenced as a feature which could supplement the 'mostly durable' boundaries of the site. This distance from the site means that it could never performance such a function.

Sustainability of the location

- 6.35 Consistent with comments provided on the Pool Lane site above, it is noted that this allocation is located some distance from the main centre of Lymm (approximately 1.7km from the centre of the site) and beyond reasonable walking distance and, as with the Pool Lane site, necessitates the use of the narrow footway to the northern side of Warrington Road (and will require the road to be crossed). There is no opportunity to provide additional pedestrian (or vehicular) connections to the settlement. For the same reasons presented above, this should be given due consideration in the assessment of the site and its suitability relative to others.
- 6.36 It is also noted that the relationship of the site to the settlement boundary results in an outward protrusion of the existing settlement into open countryside around Lymm with open land on two sides (the western and part of the southern boundary) and three sides if the Pool Lane site is excluded for the reasons set out above.
- 6.37 As a result, the development of this site cannot achieve an effective integration with the existing urban area and will result in a somewhat awkward and contrived bolt on to the settlement. This conclusion is supported by the lack of connectivity for pedestrian and cycles. This is not conducive to the objective of achieving well-designed places through the plan-making process as required by NPPF.

Flood risk

- 6.38 It is noted that approximately 50% of the site is located within Flood Zone 2. Insofar as there are alternative sites available which are located outside of Flood Zones 2 and 3, this should weigh against the allocation of this site in accordance with NPPF (paragraph 161) and application of the sequential approach to site selection.

Assessment of Parcel LY16

- 6.39 As outlined above, the plan at Appendix 6 illustrates Peel's alternative strategy for the release of land within Green Belt Parcel LY16. It has been explained why, in Green Belt terms, and in the interests of maintaining the Parcel's openness, the approach put forward by Peel is superior to the Council's selected allocation OS5. This is on the basis that it would have no effect in reducing the gap between built up areas, would be less visible and prominent than OS5 and is therefore also consistent with the conclusions of the Inspector on the appeal on the intervening land.
- 6.40 Peel's proposed approach would facilitate the development of 115 dwellings during the plan period on land controlled by Peel.
- 6.41 Peel's proposal as presented has not been assessed by the Council in considering potential allocations. However the full extent of Parcel LY16 within which Peel's site, and draft allocation OS5, are located has been considered by the Council (site reference 1545) as a potential single site allocation within the Council's site proforma assessment report. It is given a **yellow** score in respect of its overall suitability (which Peel would challenge), a **green** score in respect of its availability and an **amber** score in respect of its achievability (which Peel would also challenge). It is noted that the two other sites proposed for allocation in Lymm are given the same overall suitability and availability score as the site proposed by Peel. The **amber** achievability score given to Peel's site is due to potential remediation requirements due to the historic use of part of the assessed site which is not within the boundary of the site now proposed for allocation by Peel.
- 6.42 In respect of suitability considerations, the Council's assessment concludes that the Parcel LY16 area performs equally well as site OS4 in respect of its accessibility to various community facilities, public transport and recreation facilities, impacts on air quality, likely heritage impacts, impact on landscape character and potential ecological impacts.
- 6.43 In respect of other indicators of suitability considered by the Council, the Parcel is located wholly within Flood Zone 1 and therefore performs better than site allocation OS4 (and the same as OS5 which is part of the same site boundary as assessed by the Council). It is within 300 m of an area of natural green space and therefore performs better than site allocation OS4 in respect of this measure. It is recorded as performing more poorly compared to OS4 in respect of agricultural land only.
- 6.44 Notwithstanding this, Peel does not agree with the Council's assessment in respect of a number of areas. Comments on the Council's appraisal of the site assessed are provided below, supplemented with additional comments and observations in relation to that part of Parcel LY16 which has put forward by Peel for release and development during the plan period where appropriate.

Agricultural Land

- 6.45 The Council's assessment concludes that Parcel LY16 contains more than 20 ha of agricultural land class 1 – 2. It is given a **red** score in respect of this measure of suitability.
- 6.46 Alongside the submission of a revised Development Prospectus for the site, Peel has submitted an extensive technical evidence base to support its masterplan proposals. This includes an Agricultural Land Classification assessment produced by Reading Agricultural (November 2021) which demonstrates that Parcel LY16 provides 9.9 ha of Grade 2 agricultural land (representing an estimated 41% of the site area) and no Grade 1.
- 6.47 Accordingly, the Parcel does not contain more than 20 ha of Grade 1 and 2 of agricultural land as suggested by the Council. The total Grade 1 and 2 agricultural land is approximately half of this. The area's score in relation to this matter should be adjusted to **yellow** therefore.

Green Belt

- 6.48 According to the Council's 2017 Green Belt Assessment Addendum, Parcel LY16 makes an overall weak Green Belt contribution. Peel would agree with that point.
- 6.49 However, the Council has subsequently concluded, in the July 2017 Green Belt Assessment of individual candidate allocation sites, that the site which corresponds with Parcel LY16 makes a 'strong' Green Belt contribution (site ref. R18/076)⁴. As the site corresponds with Parcel LY16, it is unclear why the Council has now determined that the site makes a strong Green Belt contribution when assessed as a potential allocation.
- 6.50 In line with the 2017 Green Belt Assessment Addendum, Parcel LY16 should be recorded as making a weak Green Belt contribution. This reflects that approximately 60% of its boundary is provided by the existing urban area (including the appeal site), with the remainder provided by the Bridgewater Canal; an extremely strong and durable separation between the site and the wider expanse of Green Belt to the south.
- 6.51 On the basis that the Parcel makes a weak overall contribution to the Green Belt, this should be given considerable weight in the site assessment process and when considered against alternatives. It is noted that the other proposed Green Belt releases in Lymm (site allocation OS4) makes a moderate (and arguably strong) contribution to the Green Belt and therefore a greater than the contribution than Parcel LY16.

Land off Rushgreen Road (land to the east of Tanyard Farm)

- 6.52 Notwithstanding this, for the reasons outlined above, the allocation proposed by Peel would represent the least sensitive area of Green Belt land within Parcel LY16, being well contained by existing and emerging development and lacking in visibility from public viewpoints. In this context, when considered on its own, it evidently makes a

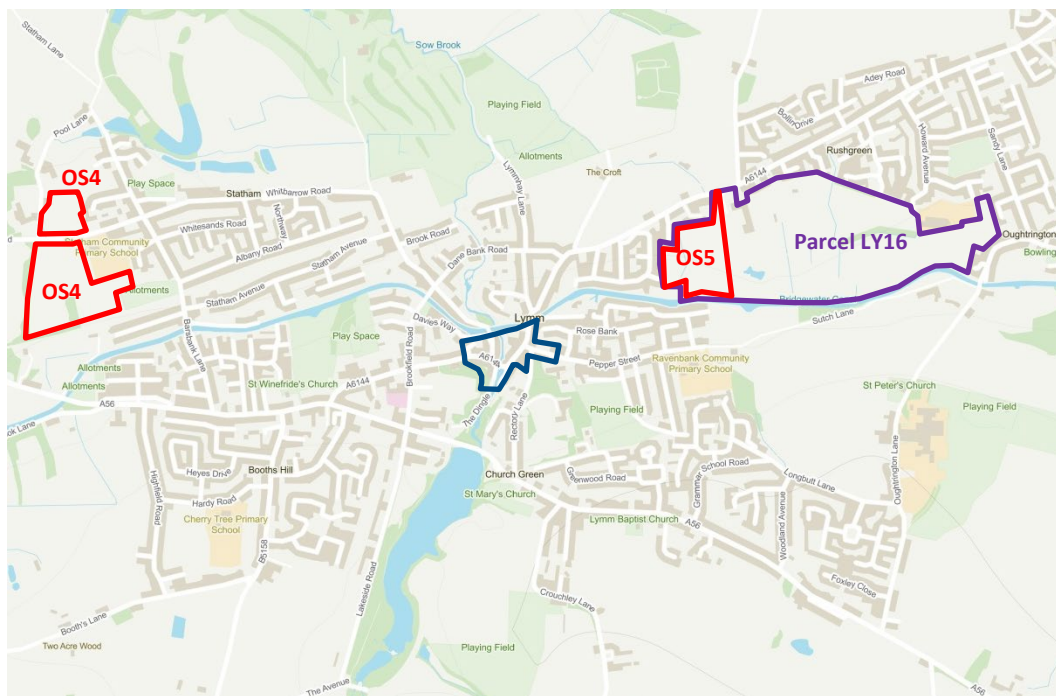
⁴ Green Belt Assessment (Additional Site Assessments of Call for Sites Responses and SHLAA Green Belt Sites) (Warrington Borough Council, July 2017)

very limited Green Belt contribution compared to site allocation OS4 and more limited compared to OS5.

Sustainability of the location and relationship with the settlement

- 6.53 Consistent with the comments presented above, it is also appropriate to highlight that Parcel LY16 occupies a more favourable location in relation to the main concentration of services and facilities within Lymm Centre than proposed allocation OS4. At its mid-point it is approximately 1.2 km away from the centre of Lymm if using surrounding roads to access the centre. Alternatively, the site would be around 1.1 km from the Centre if walking or cycling along the northern towpath of the Bridgewater Canal which provides the southern boundary to the site.
- 6.54 The site is significantly closer to Lymm Centre in this regard and a variety of attractive walking and cycling routes to the centre are available from the site, including off road options. As noted above, this accessibility is an important consideration in determining the sustainability of the location for development given the potential to promote non-car journeys and linked trips in Lymm particularly due to the size and strength of its Neighbourhood Centre. That this is not given due weight in the appraisal of sites is an error. To illustrate this point, **Figure 6.2** shows the site and those selected for allocation in relation to Lymm Centre.

Figure 6.1: Parcel LY16 and proposed allocations in relation to Lymm Centre (blue outline)



- 6.55 More generally, the Parcel's significant containment by the urban area, which bounds the site on three sides, means that its development would not be read as an outward protrusion of the urban area into open land, as is the case with OS4. Its relationship with the urban area provides the opportunity for the development to successfully knit into the urban area via a number of points of connection, including a number of residential roads running north-south off Rushgreen Road. This will promote effective

integration of the development with the rest of the settlement, making for a permeable form of development and promoting sustainable transport options.

- 6.56 This contrasts with site allocation OS4 which presents itself as a somewhat awkward extension western edge of the urban area. That site very clearly cannot achieve the same level of seamless connection with the urban area given its limited active interface with the settlement. From a spatial planning and urban design view point, it does not provide the opportunity to deliver a sustainable, integrated form of development and to achieve effective place making to the same degree. This is an important consideration in the appraisal of sites for allocation, reflecting the emphasis placed on achieving well-designed places within NPPF.

Remediation opportunity and development achievability

- 6.57 One of the measures of suitability within the Council's appraisal is whether the development of the site presents a remediation opportunity. Those sites that do, and where that remediation can be secured as part of development, are generally scored favourably compared to land where no such opportunity exists, reflecting the benefits derived from remediating contaminated land.
- 6.58 In respect of Parcel LY16, an **amber** score is given against this measure with the pro-forma noting that the site *'may be difficult to remediate.'*
- 6.59 The extent of brownfield and therefore potentially contaminated land is limited to c20% of the parcel area. As noted above, this part of the site is now subject to a full planning permission, secured at appeal, by a national housebuilder. Issues of contamination/remediation were not material enough to cause permission to be refused and development is now underway. This is therefore clearly not an issue that detracts from the proposed allocation. Furthermore, this area is no longer within the extent of the allocation proposed by Peel.
- 6.60 The site assessed should be given a **green** score against this measure of suitability reflecting the opportunity presented to remediate land within the parcel and the certainty that this will happen through the delivery of the appeal scheme.
- 6.61 Reflecting comments in the pro-forma regarding remediation, the Council has also given the site an overall score of **amber** for achievability and commented that the site may be affected by abnormal costs.

Land off Rushgreen Road (land to the east of Tanyard Farm)

- 6.62 For the same reasons noted above, this is not relevant in relation to the site being promoted by Peel. Development of the is achievable and the site should be given an overall achievability score of **green** based on this evidence.
- 6.63 Notwithstanding this, to the extent that contamination could be a constraining factor, this clearly does not apply to land to the east of the appeal scheme as a greenfield site.

Revised site scoring

- 6.64 Taking the above comments into account, the table at Appendix 7 presents a comparison of the relative suitability scoring of the Council's proposed allocations against Green Belt Parcel LY16.
- 6.65 In addition to the above, and reflecting the comments provided, a consideration of Green Belt harm and proximity to the Lymm Centre should be included in the suitability assessment. These are important considerations in providing a fully rounded view on the relative suitability of contender sites. In respect of these items, the following scoring should be given to the sites assessed above:
- **Green Belt:**
 - Site allocation OS4: Amber reflecting a moderate Green Belt contribution but one which is marginal once professional judgment is applied.
 - Parcel LY16: Yellow reflecting a weak Green Belt contribution
 - **Proximity and accessibility to Lymm Centre:**
 - Site allocation OS4: Red reflecting that the site is more than 1.5 km from Lymm Centre
 - Parcel LY16: Amber reflecting that the site is between 1km and 1.5km from Lymm Centre
 - **Contaminated land:**
 - Site allocation OS4: amber as recorded by the Council reflecting that the site's potential to be contaminated and that it is not known whether remediation would be viable
 - Parcel LY16: Green reflecting that the parcel's development can secure its remediation.
- 6.66 The revised assessment above and taking into account the sustainability/accessibility of the location demonstrates that Parcel LY16 considered as a single proposed development site would, in overall terms, achieve a better suitability score than the other site:
- The site would score better than site OS4 on **six** grounds and worse on **three** grounds.
- 6.67 It is accepted that each of the above sites would have a **green** availability score, consistent with the Council's appraisal.
- 6.68 Parcel LY16 should be given a **green** achievability score for the reasons noted above. It is accepted that the other three sites assessed in this paper should also be given a **green** achievability score in accordance with the Council's assessment.

6.69 In applying the criteria set out within the Council's appraisal framework, plus bringing Green Belt harm and Centre proximity into the consideration of suitability for the reasons outlined, it is evident that land within Parcel LY16 would, in overall terms, represent the most suitable and most sustainable location for development within Lymm when compared against those selected for allocation in the PUSLP.

Weighting of suitability indicators

6.70 Notwithstanding the above, it is important to highlight that the long-term endurance of the Green Belt is a strategic matter for the PUSLP, reflected in Objective W2. Accordingly in the comparative appraisal of sites it is necessary to ensure that Green Belt contribution is given significant weight (not just equal weight to other matters of less strategic importance) as part of the balanced assessment of options. Sites which make a weak Green Belt contribution (such as land within Green Belt Parcel LY16) should be favoured where possible. This weighs further in favour of the allocation of Peel's site over others selected within Lymm.

6.71 Further, the application of the sequential approach to site selection (in respect of flood risk), as required in accordance with paragraphs 161 and 162 of the NPPF, justifies the allocation of land within Parcel LY16 in preference to site allocation OS4.

6.72 The issue of Flood Risk Zoning is not just another consideration to be weighed in the planning balance, rather express justification for the selection of sites in Flood Zones 2 and 3 over sites in Flood Zone 1 (which would include Parcel LY16) is needed in accordance with paragraphs 161 and 162 of the NPPF. Flood risk should be given very significant weight in a balanced assessment of potential allocations.

6.73 In this context, any suggestion that site OS4 may be marginally more sustainable than land within Parcel LY16 on other grounds is insufficient to justify their allocation.

6.74 Peel has presented evidence that further land within Parcel LY16 would be developable during the plan period (including having regard to access and land ownership). In this context the Council has presented no evidence to justify the selection of sites in Flood Zones 2 and 3 over otherwise suitable, and developable, land within Flood Zone 1. To the extent that it has selected such sites, this puts the PUSLP in direct conflict with the NPPF in being at odds with the sequential approach. The PUSLP is unsound as a result.

Community Facility Benefits

6.75 Alongside residential development, Peel proposes to deliver community facilities, includes sport facilities capable of use by the community health facilities, informal open space and tourism / leisure uses.

6.76 The open space could be used for different purposes but is capable of offering improved access to existing and future residents.

6.77 These additional elements offer the potential to be a significant asset for Lymm and a unique benefit of the proposal (one which other sites in Lymm, including the proposed allocations) are not capable of providing.

6.78 This proposal can address a critical shortfall in the provision of various typologies of open space within Lymm as reported in the Council's 2015 Open Space Audit, including:

- Equipped play (total area deficit of 2.75 ha)
- Informal play (total area deficit of 5.52 ha)
- Parks and gardens (total area deficit of 6.7 ha)

6.79 Whilst there are surpluses of other types of open space (e.g. semi-natural / natural open space and outdoor sports, it is important to recognise that the provision of different types of open space to provide a range and choice of outdoor access is increasingly important following the COVID 19 Pandemic. In addition to contribution to meeting the identified shortfall, Peel's proposal can also assist in providing a range of outdoor space typologies in an accessible location which is well-related to existing residents. The ability to deliver these benefits through the scheme proposed by Peel is an important benefit that is unique to Peel's scheme. Significant weight should be placed on this aspect of the scheme.

Other determining factors in the selection of sites for allocation

6.80 Whilst the pro-forma scoring exercise considered above has informed the selection of sites for allocation, this has been supplemented by more qualitative considerations to determine which sites should be selected. Such matters were considered through a workshop session on each site, a summary of which is provided in each site pro-forma. In some instances this raises issues which do not come across through the scoring exercise presented above.

6.81 In respect of land within Parcel LY16 two critical issues arise through the workshop sessions which are evidently determining factors in the decision not to allocate this site in full. Peel does not accept the conclusions drawn in respect of either of these matters. These points are considered below.

Access constraints

6.82 Under the 'workshop comments' section, the pro-forma notes that:

Taking into account the Council highways officer's comments, the site potential has been reduced down to 300 dwellings due to limitations on the number of access points.

6.83 No further explanation of this position is provided, although it appears to draw from the 'Additional Comments' section of the site evaluation that notes:

"The Council's design standards allow for up to 300 dwellings to be served from a single point of access provided that the access is short, the development is served from a loop road arrangement and that a secondary emergency access link is provided. Available points of access are via Rushgreen Road, Thirlmere Drive and Bucklow Gardens. The site is therefore suitable for up to 300 dwellings with a main access from Rushgreen Road and a secondary emergency access from either; Rushgreen Road (immediately adjacent to the main access but which may raise urban design issues); Thirlmere Drive

or Bucklow Gardens. Neither Thirlmere Drive or Bucklow Gardens are appropriate for additional development to be served from them (other than emergency access)."

- 6.84 The Transport Appraisal (TA) prepared by i-Transport and appended to the Development Prospectus for the Peel proposal demonstrates that a fully operational access via Bucklow Gardens can be created and delivered using land wholly controlled by Peel as well as highway. An emergency vehicle connection could be provided off the school access road to the site if required; it will connect into the site's internal road network.
- 6.85 The TA shows that Bucklow Gardens, and the access road into the site, are of an appropriate width and that satisfactory visibility splays are available, including at the junction with Rushgreen Road.
- 6.86 Traffic capacity assessments of the access points are presented in the TA which takes account of existing traffic flows from recent surveys, traffic growth to the end of the plan period and the traffic flows generated by development on the site. All of the assessments demonstrate that the proposed access arrangements, via Bucklow Gardens and a new access from Rushgreen Road (at Tanyard Farm) will operate easily within capacity with no significant queues.
- 6.87 The site is demonstrated to perform well in terms of access to sustainable travel and the masterplan provides opportunities to maximise this potential such that development in the form proposed comprises sustainable development in transport terms.

Character impact

- 6.88 Under the 'workshop comments' section, the pro-forma notes that:
- "However when compared to the other contender sites...the development of the whole site in this location would have a greater impact on the character of the settlement and the early deliverability of housing."*
- 6.89 This conclusion is evidently a determining factor in the decision not to allocate the site as proposed having otherwise found that the site is generally suitable, achievable and available and thus satisfying minimum requirements to be allocated. However the point is inchoate and unfathomable.
- 6.90 Peel does not accept there is a material effect of the character of the settlement that should have a bearing on the suitability of this parcel of land for development and any suggestion of adverse character impact, either in absolute or relative terms, is wholly unsubstantiated. The Council has not presented a townscape or built environment character assessment to enable such a conclusion to be drawn. The Council's assessment considers landscape character but concludes that the development of the full Parcel LY16 would result in a 'moderate change.' This is the same level of change that the Council has identified as resulting from the development of proposed allocation OS4. There is nothing between the sites in this regard.
- 6.91 Accordingly, there is no basis for drawing a conclusion that a greater impact on settlement character would arise through the development of this site compared to

others and such unqualified judgements should not be a determining factor in the site selection process. Put simply, this means that the decision not to allocate more land for development within Parcel LY16 cannot be linked back to a reliable and robust evidence base. It is not justified and thus is unsound as a result.

- 6.92 In response, we would note that whilst the site is well located in relation to the main urban area of Lymm, it has a limited level of visibility from major arterial roads, sitting behind the residential development fronting Rushgreen Road along the majority of the length of the site; a position reinforced by appeal scheme as permitted. Views of the site in its developed form would be limited when approaching Lymm from the east and west, including along Rushgreen Road (A6144) and the A56 which provide the main routes into the town from the east and west and B5158 which provides the main route into the town from the west.
- 6.93 The site's relative containment means that its potential impact on the area's character is limited, though it is noted that a carefully considered design will be needed to ensure an appropriate interface with the Bridgewater Canal. This can be achieved through a considered design approach which is sensitive to the potential prominence of the development from this public, albeit lesser used, view-point.
- 6.94 It should also be noted that the built environment surrounding the site is not sensitive to change nor does its character warrant specific protection on the account of it being special or unique. It comprises predominantly modern residential development. Whilst there are some heritage assets in the surrounding area they do not present a significant heritage constraint and development is capable of sustaining the significance of these assets.
- 6.95 In contrast, proposed allocation OS4 is prominently positioned along key arterial roads into the town, being sited at gateway locations. Whilst smaller in scale, these developed sites would clearly be more visible and have a greater effect on defining, influencing and changing the character of the settlement as a result. To the extent that the sites being considered could have a detrimental impact on the settlement's character, this impact would be felt more so through the development of allocation OS4.
- 6.96 The conclusion that the subject site would have a greater impact on the character of the settlement simply has no basis.
- 6.97 Having sought to undertake a reasonably thorough assessment of all site options, the ultimate decision to reject this site comes down to a wholly un-evidenced judgement. The tests of soundness are clear that plans must be justified based on proportionate evidence. No such evidence has been presented to enable this particular conclusion to reach. This renders the process of site selection in Lymm fundamentally unsound.
- 6.98 The above comment regarding comprising the early delivery of housing is due to expressed concerns about land ownership and the ability to access land to the east of the appeal site independently of the appeal site. This matter is considered above and is proven not to present a constraint. Land within the wider Parcel LY16, including last to the east of Tanyard Farm, can come forward for development early in the plan period.

Land off Rushgreen Road (land east of Tanyard Farm)

6.99 Notwithstanding this, to the extent that any character impact could conceivably arise, the area of land proposed for release and development by Peel would have the least damaging effect in this regard given its physical context, strong contained and lack of prominence from public view points. This is reinforced by the appeal scheme which further contains Peel's proposed site in this regard. A discreet and un-intrusive development can be delivered within this part of Parcel LY16 whilst retaining an area of open land to the south to maintain the setting of Lymm when experienced from the canal and its tow path.

Lymm – conclusions and amendments to the PUSLP needed to correct soundness

6.100 This section of the paper has considered the sites proposed for allocation for residential development in Lymm and assessed these against the site proposed for allocation by Peel at Rushgreen Road (land east of Tanyard Farm) (within Green Belt Parcel LY16) to determine whether the most sustainable sites have been selected. It draws on the Council's appraisal of all four sites as presented within the PUSLP evidence base.

6.101 The assessment presented above has demonstrated that:

- 1) In the context of the release of land within Green Belt Parcel LY16 land to the east of the recently approved residential development at Tanyard Farm would represent the least sensitive Green Belt release and should be the first priority area for release within this Parcel.
- 2) In the context of Lymm as a whole, the area of Green Belt Parcel LY16 would represent the most sustainable location for meeting the settlement's development needs and should be prioritised over other locations, including the sites selected for allocation (Allocation OS4)
- 3) The Council has overstated the Green Belt contribution made by the site which corresponds with Green Belt Parcel LY16. This should be recorded as making a 'weak' overall contribution score consistent with the Council's 2017 Green Belt Assessment Addendum
- 4) The Council has overstated the harm which will result from the loss of high quality agricultural land if Parcel LY16 were developed for housing.
- 5) The negative scoring of Parcel LY16 from an achievability point in relation to remediation is unfounded.
- 6) The Council has failed to have regard to the proximity of sites to Lymm Centre as an important indicator of their relative sustainability as locations for development and therefore their suitability for allocation.
- 7) The Council has drawn wholly unsubstantiated and un-evidenced conclusions regarding the character effects of the development of land within Green Belt

Parcel LY16. In any case, the area of land proposed for release by Peel is evidently the least sensitive part of the LY16 parcel in this respect and would not give rise to character impacts given its discreet location and contained setting.

- 8) The Council has failed to apply the sequential test to site selection in accordance with the requirements of NPPF (paras 161 and 162) in proposing the allocation of sites part within Flood Zones 2 and 3, in favour of land within Flood Zone 1, without express justification
- 9) Peel's proposed allocation to the east of Tanyard Farm as proposed can be developed and accessed entirely independently of land to the west and an acceptable access can be created via the residential road network immediately to the north. There are no access, or associated ownership, constraints to the development of Peel's site.

6.102 Taken these points on a cumulative basis, these points demonstrate that the release of land within Parcel LY16 represents the most sustainable approach to meeting the housing needs of Lymm. Within this context, land off Rushgreen Road (land east of Tanyard Farm) would be the least sensitive area for release within Parcel LY16 and should be prioritised over other areas within the same parcel where greater impacts on the site's openness would occur. This is an evidenced position as presented through the above assessment.

6.103 As a result, the allocation of sites OS4 and, in the form proposed, OS7 cannot be justified in the context of reasonable alternatives. The allocation of these sites in favour of land off Rushgreen Road (to the east of Tanyard Farm) is not supported by objective and proportionate evidence and would be unsound as a result.

6.104 Applying a sequential approach to site selection, starting with the most suitable and sustainable site(s), the allocation of land off Rushgreen Road (to the east of Tanyard Farm) should be the first priority as critical step in ensuring a sound approach to the growth of Lymm is taken. Additional land within Green Belt Parcel LY16 would logically be the next priority before the selected site allocation OS4.

7. Summary and conclusions

- 7.1 This Paper considers the sites which the PUSLP proposes for allocation for development over the plan period within the named Outlying Settlements of the Borough, the question of whether these are justified in representing the most sustainable relative to reasonable alternatives and thus whether the PUSLP reflects an appropriate strategy and is therefore sound.
- 7.2 It provides comments on the sites selected in the context of the overall plan strategy as advanced by the Council and assesses these against the proposals put forward by Peel as potential site allocations. These comments should be read alongside Peel's wider representations on the plan strategy, in particular in terms of the plan period housing requirement and spatial distribution of development, and the changes to the PUSLP put forward by Peel in this regard, as contained within Paper 1.
- 7.3 Added to this, this Paper sets out details of sites which should be designated as safeguarded land within the Local Plan to meet development needs beyond the plan period, reflecting a need for such designations, including in the Outlying Settlements, as outlined in Paper 1.

Consideration of Green Belt contribution in the site assessment process

- 7.4 The Council has determined that all potential sites for allocation which are deemed to make a strong overall Green Belt contribution should be discounted from the site selection process, notwithstanding their potential suitability when other sustainability measures are factored into the process. This approach is flawed and renders the PUSLP unsound insofar as the selected allocations cannot be proven to represent the most sustainable when considered against reasonable alternatives.
- 7.5 To address this point of unsoundness, it is necessary to expand the suitability criteria presented within the Site Proformas Report to include Green Belt contribution measured properly.

Culcheth

- 7.6 The PUSLP proposes to allocate a single site to the east of Culcheth for residential development, with an assumed capacity of 200 dwellings (Policy OS2). The entirety of that site's southern and eastern boundary is non-durable, comprising a hedge line with intermittent trees. The site has a relatively high degree of exposure to the wider area of Green Belt beyond its southern and eastern boundaries which are non-durable, comprising a hedge line with intermittent trees.
- 7.7 The Council's proposed allocation is not well associated with the existing settlement; it is valued for its scenic quality and representativeness of the Landscape Character Type 2: Mossland Landscape, which is assessed as being 'open and exposed'; and development would be clearly visible from Holcroft Lane (the main approach into Culcheth) and from Warrington Road, which defines the boundary to Culcheth.

- 7.8 Peel has historically promoted land to the north east of Culcheth for residential development. Peel's revised proposals for that site involve approximately 300 dwellings during the plan period with an associated safeguarded designation with capacity to provide a further 300 dwellings beyond the plan period. The plan period proposals also include the provision of a new country park for Culcheth, open space (potentially including playing pitches and allotments) and highways improvements and a new drop-off facility for Culcheth High School.
- 7.9 Peel's proposed development of land to the north east of Culcheth to provide 300 dwellings during the plan period would represent a more sustainable approach to delivering the PUSLP development requirements of Culcheth and would realise significant and unique benefits in the process which other sites cannot. In addition, Peel's proposal provides the added benefit of making provision for contributing to meeting the development needs of Culcheth beyond the current plan period through a safeguarded land designation.

Croft

- 7.10 The PUSLP proposes to release land to the north east of Croft for residential development of approximately 75 dwellings (Policy OS1).
- 7.11 Peel has historically promoted an alternative site located off Lady Lane, Croft for residential development of approximately 200 dwellings. The updated Development Prospectus for the Lady Lane site presents an alternative iteration of Peel's proposal showing how the land at Lady Lane could be released to deliver a lower level of development during the plan period (83 units), with the balance designated as safeguarded land to meet requirements beyond the current plan period (112 units)
- 7.12 Section 4 of this Paper compares the Council's proposed allocation at north east of Croft (Policy OS1) against Peel's alternative proposal for land at Lady Lane, Croft. It demonstrates that Peel's proposals would present a more appropriate and sustainable allocation than the Council's proposed allocation.
- 7.13 In addition, the Lady Lane site offers further development potential beyond the plan period. A larger, well contained and logical Green Belt release can be delivered in this location which includes an appropriate element of safeguarded land, the need for which is outlined in Papers 2 and 3 of Peel's representation. Taking a long-term approach to the growth of the settlement mitigates the risk of its piecemeal expansion beyond the plan period. No such opportunity exists in respect of the site north east of Croft.

Hollins Green

- 7.14 The PUSLP proposes to release land to the south west of Hollins Green for residential development of 90 dwellings (Policy OS3).
- 7.15 Peel has historically promoted an alternative site located off Manchester Road, Hollins Green for residential development with a capacity of approximately 300 dwellings.

- 7.16 Section 5 presents an alternative iteration of Peel's proposal showing how its site off Manchester Road could be released to deliver a lower level of development during the plan period (c. 93 units) with the balance designated as safeguarded land to meet requirements beyond the current plan period (with a capacity for c. 200 dwellings). This allows Peel's site to be assessed against the proposed allocation on a more equal and comparable basis and to demonstrate that Peel's proposal represents a suitable and sustainable alternative which can be delivered in the context of the PUSLP strategy of 'incremental growth' within Hollins Green.
- 7.17 Peel's proposal provides the added benefit of making provision for contributing to meeting the development needs of Hollins Green both during and beyond the current plan period, including through a safeguarded land designation covering part of the site.

Lymm

- 7.18 The PUSLP proposes a series of Green Belt releases in Lymm with an assumed cumulative development capacity of 430 dwellings.
- 7.19 Peel has historically promoted the allocation of a single development site located off Rushgreen Road with the potential to provide approximately 500 residential dwellings, plus an extension to the existing Oughtrington Primary School. Peel has reconsidered its proposals for the area following a fuller assessment of its constraints and opportunities and has presented an alternative strategy for the release of land in this location. Peel's proposal now includes the release of land located within the north eastern part of the parcel (land to the east of Tanyard Farm) for development during the plan period and with a capacity to accommodate c. 115 dwellings.
- 7.20 Land to the south of this up to the Bridgewater Canal is also proposed for release from the Green Belt by Peel to be either designated as a Green Wedge, or similar. Community sports facilities, open space and a marina are proposed within this area. The site offers the potential to provide significantly enhanced facilities for existing and future residents of Lymm.
- 7.21 Land immediately to the west of the site proposed for release and development by Peel benefits from planning permission for 64 dwellings granted at appeal (see above). This changes the context for the consideration of the release of land within the wider Green Belt parcel (Parcel LY16). As such Peel proposes that, in defining an allocation around this development, land to the east of the appeal site, rather than land to the west, should be selected.

Appendix 1: Proposed allocation north east of Culcheth – masterplan

Area measures:

Total site area	97.12 ha
Developable area	10.14 ha
Spine road	2.67 ha
Open Space	29.42 ha
Culcheth Country Park	38.48 ha
Allotments	0.82 ha
Formal sport	1.40 ha
Allotments/sports car park	0.27 ha
Proposed safeguarded land	13.92 ha

This site could deliver up to 300 dwellings @ 30 dwellings per hectare



LANDSCAPE ARCHITECTURE
ENVIRONMENTAL PLANNING
MASTERPLANNING
URBAN DESIGN



Canada House, 3 Chepstow Street, Manchester M1 5FW
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Key

- Proposed site boundary
- Proposed Green Belt boundary
- Existing vegetation
- Existing watercourses and waterbodies
- Proposed tree and woodland planting
- Proposed development cell
- Proposed Culcheth Country Park (retained within Green Belt)
- Proposed open space
- Potential school extension
- Sites with planning applications / recently developed
- Safeguarded land for future development
- Proposed new sports pitches
- Retained PRoWs
- Proposed pedestrian links
- Proposed primary road
- Proposed secondary road
- Proposed car parks
- Proposed vehicular access from Warrington Road (priority junction or roundabout)
- Proposed access to Culcheth High School
- Potential emergency link
- Proposed allotments
- Proposed SuDS
- Proposed NEAP/LEAP

NB: Masterplan subject to change following detailed survey work.









Warrington Local Plan Sites

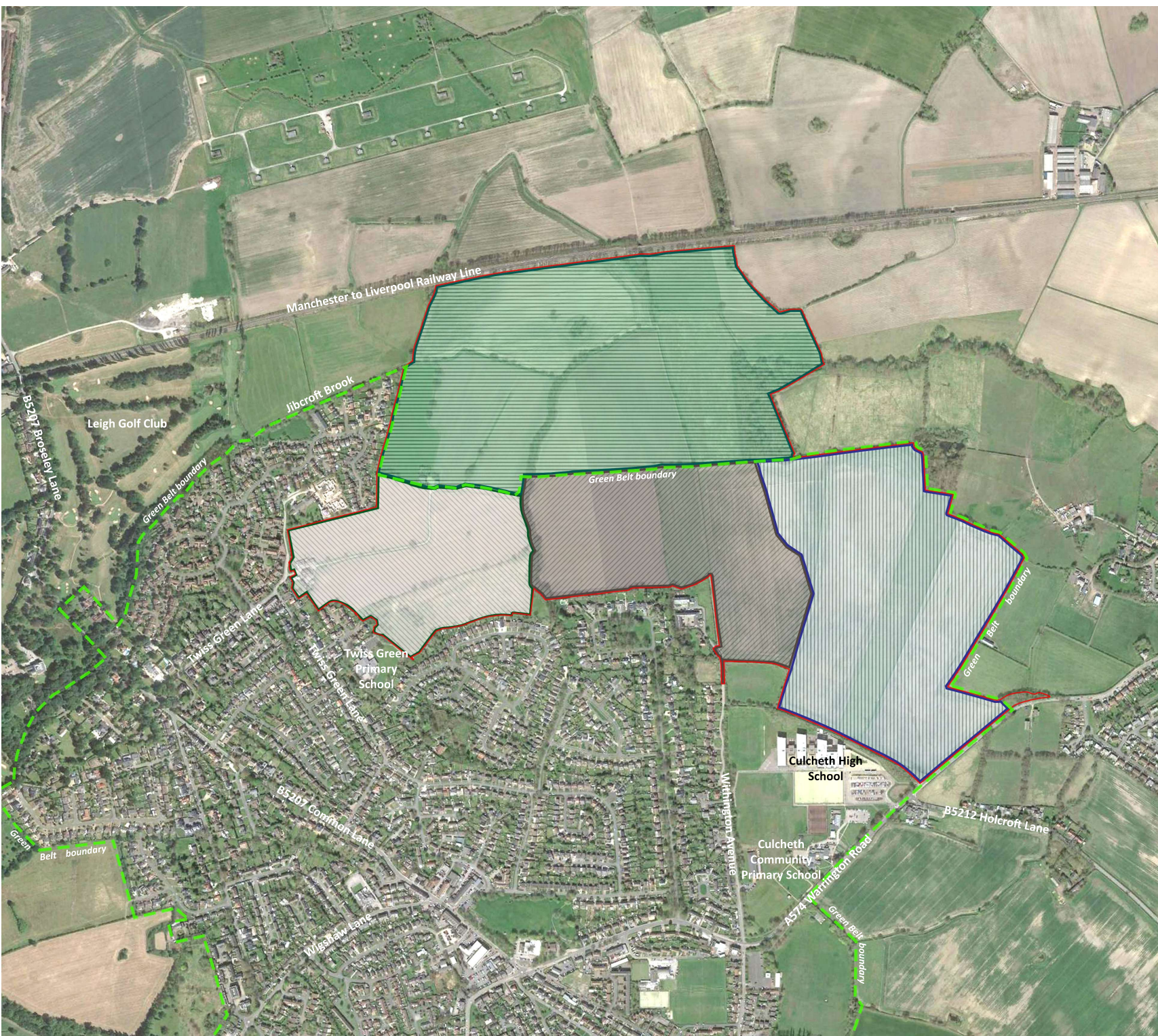
**North East Culcheth
Plan Period Illustrative Masterplan**

Drwg No: 630DC-22D	Date: 07.06.19
Drawn by: SR	Checker: SR
Rev by: SR	Rev checker: SR
QM Status: Checked	Product Status: Issue
Scale: NTS	

Appendix 2: Green Belt release and policy designation proposals, land north east of Culcheth

Key

-  Proposed site boundary
-  Proposed Green Belt boundary
-  Area to be designated as Country Park through policy allocation
-  Area to be allocated for development during the plan period
-  Area to be designated as safeguarded land for future development
-  Area to be designated as Open Space through policy allocation



Warrington Local Plan Sites

**North East Culcheth
 Proposed designations and allocations plan**













Drwg No: 630DC-23
 Drawn by: SR
 Rev by:
 QM Status: Checked
 Scale: NTS

Date: 10.06.19
 Checker: SR
 Rev checker:
 Product Status:
 Issue

Appendix 3: Proposed allocation, Lady Lane, Croft – masterplan



KEY:

-  Site boundary
-  Existing footpath
-  Proposed footpath
-  Existing buildings
-  Existing vegetation within site
-  Proposed SUDS feature
-  Proposed tree planting
-  Green infrastructure
-  Proposed development area
-  Proposed vehicular access points
-  Potential vehicular access points
-  Proposed primary road
-  Proposed secondary road
-  Safeguarded land

NB: Masterplan subject to change following detailed survey work



Land off Lady Lane, Croft
 Plan Period Illustrative Masterplan

Area Measures:	
Total site area:	10.35 ha
Infrastructure roads:	0.06 ha
Green infrastructure:	0.95 ha
Total developable area:	2.75 ha
Safeguarded area:	6.59 ha

This site could deliver up to 83 units
 @30d/ha.
















Drwg No: 630DA-12A	Date: 12.09.17
Drawn by: MP	Checker: SR
Rev by: SR	Rev checker: SR
QM Status: Checked	Product Status: Issue
Scale: 1: 5000 @ A3	



Appendix 4: Proposed allocation, Manchester Road, Hollins Green - masterplan



KEY:

-  Site boundary
-  Existing buildings
-  Existing vegetation
-  Proposed woodland planting
-  Proposed avenue trees
-  Green infrastructure
-  Proposed development area
-  Potential focal square
-  Proposed primary road
-  Proposed secondary roads
-  Proposed private drives
-  Proposed vehicular access
-  Proposed footpaths
-  Safeguard land
-  Watercourse

NB: Masterplan subject to change following detailed survey work.



**Land off Manchester Road,
 Hollins Green**

Plan Period Illustrative Masterplan

Drwg No: 630DF-10B	Date: 22.09.17
Drawn by: MP	Checker: SR
Rev by: CW	Rev checker: SR
QM Status: Checked	Product Status: Issue
Scale: 1: 5,000 @ A3	





Area Measures:
 Total site area: 12.24 ha
 Total developable area : 3.10 ha
 Spine road area: 0.50 ha
 Green infrastructure: 2.22 ha
 Safeguarded area: 6.42 ha

This site could deliver up to 93 units
 (@30 d/ha).

Appendix 5: Proposed allocation Rushgreen Road, Lymm (land to the east of Tanyard Farm) – masterplan








KEY

-  Residential development
-  Potential location for marina
-  Potential for residential or health care facility and parking
-  Potential sports facility

Appendix 6: Green Belt release and policy designation proposals, land off Rushgreen Road, Lymm (including land to the east of Tanyard Farm)

Key

-  land proposed by Peel
-  area for residential development
(with potential community health facility)
-  area to be designated as green wedge
/ safeguarded
-  Appeal site
-  proposed allocation 05



**Land off Rushgreen Road
Lymm, Warrington**

Proposed designations and
allocations

Drwg No: 630DD-18B
Drawn by: SR
Rev by: SR
QM Status: Checked
Scale: NTS @ A3

Date: 13.06.19
Checker: SR
Rev checker: SR
Product Status:
Issue

Appendix 7: Site suitability assessment – revised scoring schedules

CULCHETH

Suitability measure	Site OS3	Land north east of Culcheth (Peel's proposal)
A physical point of access into the highway	Orange	Green
Distance to principal road	Green	Green
Proximity to employment	Green	Green
Community facilities	Orange	Orange
Proximity to natural green space	Red	Green
Access to playspace	Green	Green
Access to primary schools	Green	Green
Access to bus service	Green	Green
Access to train station	Red	Orange
Access to GP/health centre	Green	Green
Air quality impacts	Orange	Orange
Remediation opportunity	Orange	Orange
Loss of high quality agricultural land	Orange	Orange
Within a Groundwater Source Protection Area	Orange	Orange

Within a flood zone		
Sterilisation of safeguarded or identified mineral reserves		
Proximity to heritage assets		
Impact on significance/setting of historic assets		
Capacity of the landscape to accommodate development	*	
Potential impact on European site, SPA or SAC		
Impact on SSSI		
Impact on wildlife sites, local nature reserves, RIGs, potential wildlife sites etc		
TPO impact		
Promote brownfield development		
Access to a household recycling centre		
Overall suitability score	*	

*denotes an adjustment to the score given by the Council through its appraisal process reflecting comments provided above.

CROFT

Suitability measure	Site allocation OS2	Land at Lady Lane (Peel's proposal)
A physical point of access into the highway	*	*
Distance to principal road		
Proximity to employment		
Community facilities		
Proximity to natural green space		
Access to playspace		
Access to primary schools		
Access to bus service		
Access to train station		
Access to GP/health centre		
Air quality impacts		
Remediation opportunity		*
Loss of high quality agricultural land		
Within a Groundwater Source Protection Area		

Within a flood zone		
Sterilisation of safeguarded or identified mineral reserves		
Proximity to heritage assets		
Impact on significance/setting of historic assets		
Capacity of the landscape to accommodate development		
Potential impact on European site, SPA or SAC		
Impact on SSSI		
Impact on wildlife sites, local nature reserves, RIGs, potential wildlife sites etc		*
TPO impact		
Promote brownfield development	*	
Access to a household recycling centre		
Overall suitability score		

*denotes an adjustment to the score given by the Council through its appraisal process reflecting comments provided above.

HOLLINS GREEN

Suitability measure	Site OS4	Land off Manchester Road (Peel's proposal)
A physical point of access into the highway		
Distance to principal road		
Proximity to employment		
Community facilities		
Proximity to natural green space		
Access to playspace		
Access to primary schools		
Access to bus service		
Access to train station		
Access to GP/health centre		
Air quality impacts		*
Remediation opportunity		
Loss of high quality agricultural land		*
Within a Groundwater Source Protection Area		
Within a flood zone		

Sterilisation of safeguarded or identified mineral reserves		
Proximity to heritage assets		
Impact on significance/setting of historic assets		
Capacity of the landscape to accommodate development		*
Potential impact on European site, SPA or SAC		
Impact on SSSI		
Impact on wildlife sites, local nature reserves, RIGs, potential wildlife sites etc		
TPO impact		
Promote brownfield development		
Access to a household recycling centre		
Overall suitability score		

*denotes an adjustment to the score given by the Council through its appraisal process reflecting comments provided above.

LYMM

Suitability measure	Site OS5	Site OS4 (Pool Lane)	Site OS4 (Warrington Road)	Land off Rushgreen Road (Peel's proposal)
A physical point of access into the highway	Orange	Orange	Orange	Orange
Distance to principal road	Green	Green	Green	Green
Proximity to employment	Green	Green	Green	Green
Community facilities	Orange	Orange	Orange	Orange
Proximity to natural green space	Red	Orange	Red	Orange
Access to playspace	Orange	Green	Green	Green
Access to primary schools	Orange	Green	Green	Green
Access to bus service	Green	Green	Green	Green
Access to train station	Red	Red	Red	Red
Access to GP/health centre	Orange	Green	Green	Red
Air quality impacts	Red	Red	Red	Orange
Remediation opportunity	Orange	Red	Red	Green*
Loss of high quality agricultural land	Orange	Orange	Orange	Orange*
Within a Groundwater	Orange	Orange	Orange	Orange

Source Protection Area				
Within a flood zone				
Sterilisation of safeguarded or identified mineral reserves				
Proximity to heritage assets				
Impact on significance/setting of historic assets				
Capacity of the landscape to accommodate development				
Potential impact on European site, SPA or SAC				
Impact on SSSI				
Impact on wildlife sites, local nature reserves, RIGs, potential wildlife sites etc				
TPO impact				
Promote brownfield development				
Access to a household recycling centre				
Overall suitability score				

*denotes an adjustment to the score given by the Council through its appraisal process reflecting comments provided above.



Turley