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Warrington Borough Council

Local Plan Review

Regulation 18 Consultation: Standard Response Form

October 2016

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2: Questions

Question 1

Do you have any comments to make about the Council's evidence base?

Question 2

Do you consider the assessment of Housing Needs to be appropriate?

Question 3

Do you consider the assessment of Employment Land Needs to be appropriate?

Question 4

Do you consider the alignment of Housing Needs and Job's Growth to be appropriate?

Question 5

Do you consider the assessment of Land Supply to be appropriate?

Question 6

Do you consider that Green Belt land will need to be released to deliver the identified growth?

Question 7

Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?

Question 8

Do you agree that further land will need to be removed from the Green Belt and Safeguarded for future development needs beyond the Plan period?

Question 9

Do you consider it appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Local Plan review?

Question 10

Do you consider the Sustainability Appraisal Scoping Report to be appropriate?

Question 11

Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?

Question 12

Do you agree with the assessment of Local Plan Policies at Appendix 1?

Question 13

Do you consider the proposed 20 year Local Plan period to be appropriate?

Question 14

Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?

3: Responses

Question 1

Please refer to the accompanying representation and Vision Statement

Question 2

Please refer to the accompanying representation and Vision Statement

Question 3

No comment at this stage

Question 4

Please refer to the accompanying representation and Vision Statement

Question 5

Please refer to the accompanying representation and Vision Statement.

Question 6

Please refer to the accompanying representation and Vision Statement

Question 7

Please refer to the accompanying representation and Vision Statement.

Question 8

Please refer to the accompanying representation and Vision Statement

Question 9

No comment at this stage

Question 10

No comment at this stage

Question 11

No comment at this stage

Question 12

No comment at this stage

Question 13

Please refer to the accompanying representation and Vision Statement

Question 14

No comment at this stage



GL Hearn

Part of Capita Real Estate

Warrington Local Plan Review

Representations on behalf of Story Homes Limited

Land at Reddish Lane, Lymm

December 2016

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Quality Standards Control

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it is has been signed by the Originators and approved by a Business or Associate Director.

DATE	ORIGINATORS	APPROVED
December 2016	Chris Sinton Senior Planner	Phil Robinson Associate Director



Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

1 INTRODUCTION

1.1 These representations have been prepared by GL Hearn on behalf of Story Homes Limited ('Story Homes') in response to Warrington Borough Council's (WBC) consultation on the Local Plan Review 'Scope and Contents Document' dated October 2016. These representations relate specifically to Story Homes' landholding at Reddish Lane, Lymm ('the site'), as shown edged red on the accompanying Site Location Plan at **Appendix A**. These representations are accompanied by, and make reference to, a promotional Vision Statement including Illustrative Masterplan, as shown at **Appendix B**.

Story Homes

1.2 Story Homes is a privately owned housebuilder. Founded by Fred Story in 1987, it has a long and successful reputation of building quality and high specification homes across the North West. The family owned business has grown in size and status over the years but remains grounded, built on its original ethos of 'doing the right thing' and creating a brand synonymous with quality. In 2017 it plans to build 1,100 new homes across the North of England.

1.3 For nearly 30 years Story Homes has been the name most often associated with aspirational homes for sale throughout Cumbria, the North East and Lancashire. A passion for quality and excellence has seen Story Homes become a multi award winning UK property developer; with modern and attractive homes instantly inspiring buyers. For the third year running since becoming eligible, Story Homes were awarded the top '5 Star' rating in the house building industry's annual customer satisfaction survey for 2016.

1.4 Story Homes' success is underpinned by a determination to understand the needs of communities where they build and a goal to deliver design quality and high quality building specifications that enhance locations. A detailed introduction to Story Homes is included within the Vision Document at **Appendix B**.

Contextual Background

1.5 The Development Plan for WBC comprises the Warrington Local Plan Core Strategy ('Core Strategy') which was adopted in July 2014. Following a High Court Challenge lodged by Satnam Millennium Limited to the adoption of parts of the Core Strategy the Judge ruled in favour of the claimant on three of the nine issues resulting in the removal of the following elements of the housing policies from the Plan:

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

- 1.6 In April 2015 the WBC Executive Board approved a revised Local Development Scheme (LDS) which set out a work programme to re-instate the Local Plan housing target - which had been quashed by the February High Court judgement - through a Primary Plan Alteration and introduce a Community Infrastructure Levy (CIL). A Primary Plan Alteration (or Local Plan Review) was to be progressed by the Council as a matter of urgency in order to establish a new housing target and to provide guidance on the location of new homes.
- 1.7 In a report to the Executive Board in October 2015, Council Officers acknowledged that through its evidence base work *“it is becoming increasingly apparent that the Council is not currently able to identify sufficient land to meet its likely housing need in accordance with the requirements of the National Planning Policy Framework (NPPF). This means that the Council will need to undertake a more fundamental review of the Plan than currently envisaged in the LDS with further work required to enable the Council to assess the options for and implications of meeting its housing need in full.”*
- 1.8 In January 2016 the Council published its Strategic Housing Land Availability Assessment (SHLAA) which identified a number of potential development sites within the Borough although discounted sites situated in the Green Belt due to policy constraints.
- 1.9 The Council also jointly commissioned GL Hearn to undertake a Strategic Housing Market Assessment (SHMA), in partnership with Halton and St Helens Councils who together with Warrington form the Mid-Mersey Housing Market Area (HMA). This confirmed the ‘Objectively Assessed Need’ for the HMA equated to 1,756 homes per annum of which 839 homes per annum should be apportioned to Warrington. This figure was updated in October 2016 in a SHMA Addendum which suggested a revised housing need in Warrington of 984 dwellings per annum.
- 1.10 The Council has now published its Local Plan Review Scope and Contents document for consultation until 5 December 2016 together with its supporting evidence base including a Green Belt Assessment. In it the Council identifies a minimum housing target of around 1,000 dwellings per annum across the Plan period with sufficient Green Belt land release to accommodate approximately 5,000 new homes.

Purpose of the Representations

- 1.11 The key purpose of this representation is to promote land at Reddish Lane, Lymm for Green Belt release and secure its designation through the Local Plan Review for housing. Responses are also provided to the overarching questions posed by the Council in respect of the Scope and Contents Document.

Structure of the Representations

- 1.12 The structure of this representation is separated into two distinct parts:
- Part 1 - Overarching representations to the Scope and Contents Document questions; and
 - Part 2 - Site specific representations presenting the justification for the release of the site from the Green Belt and its allocation for housing in the Local Plan Review.

Collaborative Working

- 1.13 Story Homes will seek to work collaboratively with WMBC to deliver a ‘sound’ Local Plan Review which meets the identified housing needs in the Borough. We would welcome future meetings with WMBC Policy Officers and local community to discuss the development opportunities at the site.

Land at Reddish Lane, Lymm

- 1.14 WBC will be aware that Story Homes has an interest in and is promoting the land at Reddish Lane, Lymm to the north of the village for residential development. This is an opportunity to create a high quality development which provides new attractive family homes as part of a sustainable natural environment, integrated with new green and blue infrastructure. It will help Warrington to meet its growing housing needs and play a crucial role in achieving sustainable development.
- 1.15 A Vision Document for Reddish Lane is submitted to WBC alongside this Report in response to the “call for sites”. It sets out that the Site:
- Can be accessed directly from Rush Green Road and can be delivered without placing any undue pressure on the local highway network;
 - Is in a highly sustainable location in very close proximity to key services and facilities within the village centre, and can be integrated successfully with the existing community at Lymm;
 - Provides an opportunity to create a truly landscape led development which enhances key landscape features to create a new biodiversity and recreational resource for Lymm;
 - Will result in relatively minimal harm to the key purposes of the Green Belt and will create new defensible boundaries which protect the wider amenity and purposes of the Green Belt beyond the site, particularly to the north.

- 1.16 To ensure the appropriate development of the Site, Story Homes has instructed a development team with a proven track record in delivering successful development. This includes GL Hearn (Planning), Astle Planning and Design (Design), Pegasus Group (Landscape and Visual Impact), Croft Transport Solutions (Highways) and Wardell Armstrong (Heritage).

2 PART 1 - REPRESENTATIONS TO THE LOCAL PLAN REVIEW

2.1 Detailed responses to selected questions posed by WBC are provided for consideration in the next stage of the Local Plan Review drawing on our extensive experience of Local Plan preparation and examinations.

Question 1 - Do you have any comments to make about the Council's evidence base?

2.2 A comprehensive review of the Local Plan Review 'Scope and Contents Document' and WBC's supporting evidence base has been undertaken. Story Homes have specific comments on the following evidence base documents which should be taken into account by the Council in the preparation of the Draft Local Plan:

- Mid-Mersey Strategic Housing Market Assessment Update (October 2016)
- Strategic Housing Land Assessment (October 2016);
- Urban Capacity Statement 2016 (October 2016); and
- Warrington Borough Green Belt Assessment (October 2016)

Strategic Housing Market Assessment (SHMA) 2016/ SHMA Update (October 2016)

2.3 Story Homes welcome the findings of the SHMA and SHMA Update and note the Objectively Assessed Need (OAN) figure of 984 dwellings per annum identified. It is acknowledged however that a more comprehensive update of the SHMA will be required in due course to reflect more recent population and household projections which have been released following publication of the 2016 SHMA.

Strategic Housing Land Availability Assessment (SHLAA) (January 2016)

2.4 The SHLAA seeks to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. Story Homes notes that there are a very limited number of sites within the Lymm Settlement boundary which can realistically deliver housing over the Plan period. Indeed, sites which were identified to be suitable, available and achievable (or likely to become available and achievable) amounted to 133 dwellings which when spread across the Plan period would equate roughly 6.5 dwellings per annum. It is clear that additional sites need to be identified to meet housing need in Lymm over the Plan period. Given that all suitable, available and achievable sites within the settlement boundary have been identified in the SHLAA the only option is to release sustainable located Green Belt sites, an approach which accords with paragraph 84 of the NPPF that states:

“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.”

2.5 Land at Reddish Lane is identified in the SHLAA under refs. 1557 ‘Large field to the east and south of Reddish Lane’ and 1558 ‘Field to the west of Reddish Lane’. Both sites are assessed as follows:

- *“Green Belt: Yes*
- *GF / PDL: GF*
- *Flood Zone: 1*
- *Contaminated Land Issues: No*
- *Ground Conditions Issues: No*
- *Site Access Issues: No*
- *Surrounding Land Issues: No*
- *Infrastructure Issues: No*
- *Hazardous Installations Issues: No*
- *Amenity Issues: No”*

2.6 Whilst the sites are assessed favourably in development terms they are discounted on account of their Green Belt policy constraints.

Urban Capacity Study (October 2016)

2.7 The Urban Capacity Study identifies an urban capacity within the Borough of 15,226 units including SHLAA sites, Masterplanned Areas and windfall sites. Whilst it is acknowledged that the study provides an initial indication of urban capacity which will be supplemented with a more detailed assessment ahead of the Preferred Development Option Stage, Story Homes have a number of concerns about some of the assumptions made. These are detailed in our response to question 5.

2.8 In the light of the above, the Council will need to release further Green Belt land in order to meet its housing requirement over the Plan period. In addition, WBC should be looking to allocate areas of Safeguarded land to ensure that Green Belt boundaries are capable of enduring beyond the end of the plan period, as set out at paragraph 85 of the NPPF. Further assessment of the evidence will be undertaken at the Preferred Development Option Stage.

Warrington Green Belt Assessment (October 2016)

2.9 Overall, Story Homes are very supportive of the release of sustainably located Green Belt sites in order to meet identified development needs and welcome the Council’s bold approach to accommodating its housing need. We fully agree that exceptional circumstances exist that warrant amending the existing tightly drawn Green Belt.

- 2.10 However, a detailed review of the Green Belt Assessment prepared by Arup & Partners Limited has been undertaken by experienced Landscape consultant Pegasus Group which raises a number of fundamental concerns regarding the methodology employed and conclusion reached in regards to the site at Reddish Lane, Lymm (ref. LY8 and LY9).

Introduction

- 2.11 In the introductory section it is acknowledged by WBC that it is not currently able to identify sufficient land to meet its likely housing need in accordance with the requirements of the NPPF. The document also notes that as part of assessing the implications of meeting its housing need in full, WBC also needs to understand how Warrington's Green Belt performs against the role and function of Warrington's Green Belt as set out in National Policy. Understanding this role and function it is stated, will enable WBC to consider whether there are 'exceptional circumstances' (under paragraph 83, NPPF) to justify altering the Green Belt boundaries through the Local Plan Process to enable existing Green Belt land to contribute to meeting Warrington's housing needs. The Green Belt Assessment represents part of the evidence base which will inform the Local Plan Review.
- 2.12 The document also sets out that the aim of the Green Belt Assessment is to provide WBC with an objective, independent initial assessment (it notes there will be the need to undertake more detailed site specific assessment work) of how Warrington's Green Belt contributes to the five purposes of Green Belt. The introduction states that the assessment does not consider whether 'exceptional circumstances' exist nor does it make any recommendations relating to the alteration or review of Green Belt boundaries.
- 2.13 The study was undertaken in two stages, Stage 1 – General Area Assessment and Stage 2 - Green Belt Parcel Assessment. Stage 1 involved dividing the entire Warrington Green Belt into large parcels ('General Areas') which were then assessed against the five purposes of the Green Belt. Stage 2 involved defining smaller Green Belt parcels around settlements on the edge or inset from the Warrington Green Belt and assessing these parcels for their contribution to the five purposes of the Green Belt.

Summary of Approach

Stage 1 – General Area Assessment

- 2.14 The whole of the Green Belt portion to the north of Lymm (referred to as 'General Area 6'), including the site, was assessed against the five purposes of the Green Belt as being of Moderate strength. On the basis that the 'general areas' were formed of large and variable tracts of the landscape which the study went on to consider as more refined parcels at its Stage 2, it is not considered that

this general finding should be given any particular weight when considering the merits of the green belt at a site specific level.

Stage 2 – Green Belt Parcel Assessment

- 2.15 At Stage 2, 203 no. parcels were defined and assessed against the five purposes of the Green Belt. The site lies across two of the parcels, which were separated due to Reddish Lane being considered to form a ‘durable boundary’. LY8 to the west of Reddish Lane was identified as making a **strong** contribution to the green belt and LY9 to the east of Reddish Lane identified as a **moderate** contribution, these judgements are not accepted and are discussed in more detail below, particularly in relation to Purposes 3 and 4.

Methodology

- 2.16 We have specific concerns over the methodology used in accessing purposes 3, 4 and 5 as well as the consistency of its application, specifically in Lymm. Each matter is addressed in turn below.

Purpose 3: To assist in safeguarding the countryside from encroachment

- 2.17 ‘Table 3 – Boundary definition’ within the Stage 2 Methodology section of the document, identifies disused railway lines as ‘Features lacking durability’ (Soft boundaries which are recognisable but have lesser permanence). It is however noted elsewhere in the document at ‘Table 2 - Approaches to boundary definition elsewhere’ within the Section 3.5 ‘Good Practice Approaches’ section of the assessment that ‘railway lines’ in general are identified as strong and durable boundaries, and what matters from a suitable green belt boundary perspective, is not whether or not the railway line is in use, but whether it forms a boundary which is likely to be permanent. In this regard many disused railway lines can be considered to form permanent boundaries, by virtue of the remaining embankments or cuttings in the landscape and also in particular where the routes have been taken over as recreational and access routes as part of the National Cycle Network.
- 2.18 In relation to the Site specifically and the permanence of the ‘disused railway line’, the line now forms part of the Trans Pennine Trail Recreational Route for walking and cycling and is part of the national Cycle Network Route 62. Physically, the route of the line is raised on an engineered embankment which runs along almost the full length of its northern boundary and serves to separate the site from the wider countryside to the north. Indeed, the land to the north including the former water treatment works is still accessed via an extant former railway bridge under this embankment line from Reddish Lane. With regard to permanence, it is noted that this embankment has been in place since at least 1875.

- 2.19 There is a clear inconsistency in the methodology here as the assessment text in Appendix G for parcel LY9 (which forms the eastern part of the site), clearly and correctly references the northern boundary of the parcel formed by the disused line which is now utilised as the route of the ‘Trans Pennine Trail’ as being ‘durable’, despite having earlier in its methodology dismissed such features as lacking durability.
- 2.20 As an aside, the approach taken in Table 5 ‘Degree of Openness Matrix’ seems to confuse the concepts of ‘openness’ and ‘visual impacts’. Whilst the concepts are undoubtedly interlinked there is an important distinction which needs to be made clear as identified in the High Court Case *Timmins v Gedling* [2014] EWHC 654.
- 2.21 The key issue identified was whether development can be detrimental to the openness of the Green Belt despite the fact that it has little visual impact on account of the fact that it cannot be seen. It was the judges view that:
- “Any construction harms openness quite irrespective of its impact in terms of its obtrusiveness or its aesthetic attractions or qualities. A beautiful building is still an affront to openness, simply because it exists. The same applies to a building this is camouflaged or rendered unobtrusive by felicitous landscaping.”¹*
- 2.22 It was recognised that the two concepts are interlinked, however visual impact does not prevent development harming the openness of the Green Belt, notwithstanding the fact that lack of visual impact could be considered to be a factor that contributes to the very special circumstances required to justify inappropriate development in the Green Belt as established in paragraph 87 of the NPPF.
- 2.23 Overall, we have concerns that the overarching methodology has failed to properly identify and consider the manner in which former railway lines, with significant remaining landscape engineering and which now form part of the National Cycle Network represent durable and permanent boundaries, on a par with roads or railways lines either in use or safeguarded. Concerns are also raised in respect to the interpretation of openness versus visual impact in Table 5.

Purpose 4 – To preserve the setting and special character of historic towns

- 2.24 The assessment has relied upon a crude desk-based approach to considering whether the identified green belt parcels contribute to purpose 4 ‘*to preserve the setting and special character of historic towns*’, placing heavy emphasis on 250m buffer zones around identified heritage features including conservation areas. It is not appropriate to state that a parcel makes a strong contribution

¹ High Court Case *Timmins v Gedling* [2014] EWHC 654, Paragraph 74

to purpose 4 simply by virtue of its location within 250m of a heritage feature, what matters is whether or not the development of the parcel would be detrimental to the character and setting of the heritage feature. There are many scenarios where areas of land within 250m of a heritage feature are not critical to its setting or character and can therefore be brought forward for development without being detrimental to the feature. Indeed the Lymm Conservation Area Appraisal makes no reference to a 250m buffer only to the need to carefully consider proposals outside the Conservation Area which would affect its setting, or views in and out of the area. Such judgements in relation to character and setting can only be made properly through analysis in the field.

- 2.25 An important point to note is that there is no reference to a 250m buffer in the recently published Greater Manchester Green Belt Assessment, a highly comparable evidence base document. Further information on this matter is provided at paragraph 3.16 of this representation.

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 2.26 With regard to purpose 5, it is noted that the parcels are scored as providing a moderate contribution by virtue of the existence of brownfield land elsewhere in the Mid Mersey Housing Market Area, notwithstanding that this may lie outside of Warrington Borough.
- 2.27 The Green Belt boundary is tightly drawn around Lymm and there is very little previously developed land which could accommodate its acute development needs. In light of this, it is considered that the methodology used is fundamentally flawed. On this basis, parcels LY8 and LY9 should be assessed as having a weak contribution to this purpose.

Comparison of other parcels in the Lymm Area identified as ‘weak’

- 2.28 Only three Parcels, are identified as ‘weak’ within the Lymm Area. Parcel LY20 however, is located south east of the Lymm settlement boundary, and is identified as making a **moderate** contribution to purpose 3 (encroachment) and **no** contribution to Purpose 4 (historic towns). Located to the south of Rushgreen, Outrington and the Bridgewater Canal, the parcel is remote from the centre of the village and the majority of key services and facilities. The site is remote from any conservation area buffers however it is immediately adjacent to the Bridgewater Canal (opened in 1761). Land cover is currently woodland known as the Spud Woodland. Views of St Peter’s Church, Outrington are gained from the Mersey Valley Way Public Right of Way which passes through the parcel.
- 2.29 Whilst the Green Belt Assessment does not consider whether ‘exceptional circumstances’ exist nor does it make any recommendations relating to the alteration or review of Green Belt boundaries it is likely that parcels identified as performing a weak contribution are likely to be considered more

favorably for release. However, this parcel would appear to be unfavourable in terms of current land use and relative location to the settlement, certainly when compared with the Reddish Lane site.

Summary and Conclusion

- 2.30 A full appraisal of the site against the 5 Green Belt purposes is provided in section 3 of the Site Vision Document at Appendix B of this representation. However, it is considered that overall both parcels LY8 and LY9 make a limited contribution to the functions of the green belt and if the site had been properly appraised should be considered to be ‘weak’ in terms of their green belt function.
- 2.31 In summary, we consider parcels LY8 and LY9 in which the Reddish Lane Site is located to be well contained by surrounding development and the former railway line which now forms the route of the Trans Pennine Trail and its associated vegetation. There appears to be weaknesses in the methodology and the general findings of the Assessment currently appear unhelpful in terms of providing an appropriate evidence base for considering appropriate sites for Green Belt release. These issues appear to be highlighted by the fact that a parcel remote to the settlement, such as Parcel LY20, can be found to make a weak contribution to the purposes of the Green Belt.
- 2.32 The Site Vision Document sets out why the site is considered one of the most sustainable locations in the Borough for residential development and sets out how the release of the site from the Green Belt will meet the exceptional circumstances test as required through the NPPF.

General Comments on the Evidence Base

- 2.33 It is important that the evidence base prepared to inform the Local Plan Review takes account of the emerging Greater Manchester Spatial Framework (GMSF) and Liverpool City Region Spatial Framework (LCRSF) and supporting evidence base to identify opportunities for cross-boundary working in accordance with the Duty to Co-operate set out in the NPPF.
- 2.34 Furthermore, the proposals to be identified in the Government’s forthcoming Housing White Paper and updated NPPF should also be taken into consideration.

Question 2. Do you consider the assessment of Housing Needs to be appropriate?

- 2.35 At this stage Story Homes note WBC’s assessment of housing need and note the identified OAN of 984 as set out in the SHMA Addendum. The OAN only provides the starting point for the housing requirement and other considerations are necessary which may lift the amount of housing required to be delivered by the Plan.

Question 4 – Do you consider the alignment of Housing Needs and Job’s Growth to be appropriate?

- 2.36 The Mid-Mersey SHMA and SHMA Addendum seeks to align economic and housing needs and is supported by Story Homes. This approach is considered consistent with paragraph 158 of the NPPF and PPG (ID 2a-018). Overall, it is considered that the conclusions drawn are appropriate and acknowledge that the OAN only provides the starting point for the housing requirement and other considerations are necessary which may lift or reduce the amount of housing required to be delivered by the Plan.

Question 5. Do you consider the assessment of Land Supply to be appropriate?

- 2.37 A detailed assessment of the sites included within the SHLAA and Urban Capacity Study has not been undertaken at this stage and therefore it is not possible to comment on the deliverability of the individual sites identified. However, Story Homes has a number of concerns which should be taken into account by the Council when preparing the Preferred Options Consultation document which include:

- Windfall allowances;
- Lapse Rates; and
- Buffer to cover non-delivery

- 2.38 These matters are addressed in turn below.

Windfall allowance

- 2.39 Paragraph 48 of the NPPF advises that LPA’s may make an allowance for windfall sites in the five-year supply provided that compelling evidence exists demonstrating that “*such sites have consistently become available in the local area and will continue to provide a reliable source of supply*”. Whilst LPAs may include historic windfall delivery rates in allowances it must also have regard to expected future trends to ensure realistic estimates, something which is absent from both the SHLAA and Urban Capacity Study.

- 2.40 It is noted that the Council is reliant upon a 64dpa windfall allowance and does not appear to have applied any discount to extant planning permissions. This figure appears to be based solely upon historic completions from this source between 2009/10 and 2014/15. This indicates an average of 64 dwellings from windfalls each year. However the delivery from windfalls in 2013/14 and 2014/15 delivered higher levels of windfall dwellings (83 and 139 respectively) which has the effect of pushing up the overall average across the period. The reason for this increase may be partially as a result of the policy vacuum created when the Core Strategy’s housing policies were quashed. Removing these two years has the effect of reducing the windfall average to 41dpa.

2.41 Story Homes also have concerns that the windfall allowance has been applied from year 1. This is likely to create an element of double counting as many of the windfall sites which will deliver in years 1 to 3 will already need to benefit from planning permission to be completed in this period. We therefore recommends that a discount is applied to the first few years and further consideration is given to the impact of the final two monitoring years upon average windfall delivery.

2.42 There is no published guidance on how a windfall allowance should be derived and any approach is therefore a matter of local discretion. However, it is clear that the assessment should be made in the context of a new plan and the evidence base which informs it. Story Homes therefore recommend that further scrutiny be undertaken of the sources of windfall supply and consideration given to their likely delivery over the plan period.

Discount applied to extant planning permissions

2.43 From our initial review of the SHLAA and Urban Capacity Study there is no mention of whether a lapse rate has been applied to sites with extant planning permission thereby acknowledging that not all of the sites will come forward. In line with Planning Appeals ref. APP/X2410/A/13/2196928 'Land off Mountsorrel Lane, Rothley, Leicestershire' and APP/H1840/A/12/2171339 'Land between Station Road and Dudley Road, Honeybourne, Worcestershire' consideration should be given to the application of a standard 10% lapse rate across the board. Both inspectors considered that a 10% reduction was justified overall and reasonable having regard to lapses, delays and reduced delivery.

Buffer to cover non-delivery

2.44 As recommended in the Local Plan Expert Group (LPEG) Report to the Communities Secretary and to the Minister of Housing and Planning (March 2016) Story Homes consider that the plan contain a buffer of sites to insure against any none or under-delivery from Local Plan allocations or windfall sites. The reasons for the inclusion of such a buffer are two-fold. Firstly, the NPPF at paragraph 182 is clear that plans should be positively prepared, aspirational and significantly boost housing supply. In this regard the housing requirements set within the plan should be viewed as a minimum requirement, not a ceiling, an interpretation which is consistent with numerous inspectors' decisions at Local Plan examination. Therefore if the Plan is to achieve its housing requirement as a minimum, it stands to reason that additional sites are required to enable the Plan requirements to be surpassed. Secondly, due to a variety of reasons, some sites will either underperform or fail to deliver during the Plan period. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement and allow for additional flexibility.

Question 6. Do you consider that Green Belt land will need to be released to deliver the identified growth?

- 2.45 The evidence presented by WBC clearly demonstrates that there is insufficient land to meet its housing and employment needs within the urban area. Paragraph 83 of the NPPF states that (GLH emphasis in bold):

*“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be **altered in exceptional circumstances**, through the **preparation or review of the Local Plan**. At that time, authorities should consider Green Belt boundaries having regard to their **intended permanence in the long term**, so that they are capable of **enduring beyond the plan period**.”*

- 2.46 The need to boost significantly the supply is a key ambition of the NPPF. The Local Plan Review represents a key opportunity to meet the OAN, address the housing delivery shortfall and tackle growing affordability issues, especially in rural areas. It is considered that exceptional circumstances exist to release Green Belt land for the following reasons:

- The SHLAA and Urban Capacity Study has demonstrated that the OAN for housing cannot be met within the existing built-up area;
- Northern Powerhouse agenda and bold vision contained in the Local Plan Review is driving growth;
- The Green Belt is tightly drawn around settlements in some locations which has led to high demand which can't be met and affordability issues;
- Lack of opportunities to provide the sites the market wants, especially in areas such as Lymm;
- Significant affordability issues in certain areas of the Borough, including Lymm; and
- Releasing sustainably located strategic sites, such as Reddish Lane, offers opportunities to provide sustainable patterns of development at a scale, which can be linked to existing and/or potential transport networks; respond to market demand and; have transformational potential.

- 2.47 This Local Plan Review therefore represents an excellent opportunity to review the Green Belt boundary to meet its development needs beyond the Plan period. Story Homes strongly supports

the release of sustainably located Green Belt sites especially in settlements where growth has been stifled by tightly drawn Green Belt boundaries such as Lymm.

Question 7. Do you consider the three identified Strategic matters being the appropriate initial focus of the Local Plan review?

2.48 Whilst the three strategic matters are considered to be broadly appropriate at this stage other matters should also be focussed upon by the Council. These include:

- The need for rural areas to grow; and
- The identification of a defined Settlement Hierarchy

The Need for Rural Areas to Grow

2.49 Paragraph 55 of the NPPF seeks to promote sustainable development in rural areas. It states (GLH emphasis in bold):

*“To promote sustainable development in rural areas, **housing should be located where it will enhance or maintain the vitality of rural communities** for example, where there are groups of smaller settlements, **development in one village may support services in a village nearby**. Local planning authorities should avoid new isolated homes in the countryside.”*

2.50 Paragraph 001 (Reference ID: 50-001-20160519) recognises that there are particular issues facing rural areas in terms of housing supply and affordability. It acknowledges that housing has a role in supporting the broader sustainability of villages and smaller settlements. The guidance states (GLH emphasis in bold):

*“A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. **Rural housing is essential to ensure viable use of these local facilities.**”*

2.51 The guidance continues (GLH emphasis in bold):

*“Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, **all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.**”*

- 2.52 The need for housing in sustainable rural locations such as Lymm should therefore be fully explored in the Local Plan Review to ensure that growth is balanced and responds to local needs across the Borough.

Settlement hierarchy

- 2.53 Whilst not being explicit about requiring planning authorities to develop a settlement hierarchy to distribute future growth, Government planning guidance details a number of objectives which should be achieved through the development of planning policy which effectively require this to happen (i.e. delivering Sustainable Patterns of Development – focusing development in locations which offer a range of community facilities, services, jobs, and infrastructure).
- 2.54 Story Homes would support the identification of a settlement hierarchy in policy terms which directs development to sustainable locations throughout the Borough including rural areas (as above). Lymm is a sustainable settlement which has historically been constrained by tightly drawn Green Belt boundaries which have restricted growth and created a significant housing affordability problem. The village is well served by a range of services, facilities and amenities, and is well connected in terms of public transport and the strategic highway network, as described in the accompanying Vision Statement. The village accounts for 6% of households in the Borough. Assuming an apportionment of 6% of the total housing requirement of 20,000 dwellings across the Plan Period Lymm should be apportioned at least 1,200 new homes. The village could sustainably accommodate additional housing growth and Story Homes consider that it should be regarded as a Tier 2 settlement on account of its size and existing services.

Question 8. Do you agree that further land will need to be removed from the Green Belt and Safeguarded for future development needs beyond the Plan period?

- 2.55 Paragraph 85 of the NPPF is clear that Local Planning Authorities where necessary should “*identify in their plans areas of ‘safeguarded land’* between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the Plan period” which in this instance is 2027. This coupled with the NPPF’s aim to ensure that Local Plans are drafted to cover an appropriate time scale “preferably a 15-year time horizon” would suggest that Green Belt boundaries should be capable of enduring until at least 2042. The NPPF also seeks to ensure that Local Plans have a degree of flexibility such that they are able to respond to ‘rapid change’, as required by the presumption in favour of sustainable development. The identification of safeguarded land is a robust approach which has been accepted by a range of Inspectors presiding over Local Plan Examinations and is strongly supported by Story Homes. In light of the above, WBC must identify safeguarded land within the Local Plan.

2.56 There are two key benefits of safeguarded land:

- 1) The extra land assists with deliverability and enables the full housing target to be delivered over the Plan period. Should any residual land remain at the end of the Plan period then it is reasonable to assume that this land will be available for development in the next plan period; and
- 2) If all allocated land is fully-developed during this plan period it could be argued that the overprovision against need in this plan period will reduce development requirements by an equivalent amount in the next plan period.

2.57 A policy mechanism is required to release safeguarded land, if required to ensure flexibility and delivery. For the purposes of calculating the amount of Safeguarded Land, the development requirements for each settlement should be calculated and an apportionment through a defined Settlement Hierarchy policy. For example, Lymm, which represents a sustainable and accessible rural community, comprises approximately 6% of the total households in the Borough. Calculations would therefore suggest that the village should receive a 6% apportionment of the total housing requirement across the Plan period (i.e. 6% of 20,000) which equates to at least 1,200 new homes. The level of safeguarded land proposed should be proportionate to the sustainability and accessibility of the settlement.

2.58 A policy mechanism could then be developed which releases safeguarded land for development when, for example, the Council is unable to demonstrate a deliverable 5-year housing land supply. Specific details of the policy would need to be developed through the consultation process. The scope is currently silent on this issue.

Conclusion

2.59 Story Homes therefore strongly support the need to remove further land from the Green Belt and safeguard it for future use. It is recommended that the Council carefully consider the amount of land required to ensure that Green Belt boundaries will endure past 2027 in order to ensure certainty and clarity to both the housebuilding industry and local community.

Question 13: Do you consider the proposed 20 year Local Plan period to be appropriate?

2.60 As highlighted in our response to question 8, the NPPF at paragraph 157 seeks to ensure Local Plans allow for at least a 15-year time horizon. As such, Story Homes considers that the proposed 20 year Plan period to be generally appropriate subject to monitoring policies being built into the Local Plan which ensure that the Council continues to maintain a deliverable 5 year housing land supply. It is currently unclear what the start date of the Local Plan will be and however any shortfall

in housing delivery within the 5 years will be accommodated (i.e. Sedgefield approach). Story Homes seeks that sites allocated within the Local Plan are deliverable in the first five years in order to boost the supply of housing. As demonstrated in Part of this representation and in the accompanying Vision Statement, Land at Reddish Lane is deliverable in accordance with the NPPF.

3 PART 2 - SITE SPECIFIC REPRESENTATIONS

- 3.1 These site specific representations seek to promote land at Reddish Lane, Lymm for release from the Green Belt and allocation for housing in the Warrington Local Plan Review. In the context of the Council's need to release sites from the Green Belt to meet its identified housing requirement these representations provide a detailed justification for the allocation of the site for residential development, supported by a suite of technical studies undertaken on behalf of Story Homes.
- 3.2 A Vision Document including an Illustrative Masterplan demonstrates how a development of up to 166 new homes set in attractive landscaping could be accommodated on site.
- 3.3 The residential allocation of Reddish Lane would contribute to ensuring that WBC has sufficient land to meet its housing requirement over the Plan period to 2027 and achieves a supply of specific deliverable sites as required by the NPPF. The site offers an opportunity to provide a significant amount of new high quality homes for which there is an acute need in Lymm.
- 3.4 This section should be read in conjunction with the accompanying Vision Document and will address the following matters:
- Case for Lymm to receive growth;
 - Case for releasing the site from the Green Belt;
 - Sustainable development principles; and
 - Overall suitability of the site and deliverability of the scheme proposals.

Case for Lymm to Receive Growth

- 3.5 Lymm is a sustainable settlement which has historically been constrained by tightly drawn Green Belt boundaries which have restricted growth and created a significant housing affordability problem. The village is well served by a range of services, facilities and amenities, and is well connected in terms of public transport and the strategic highway network, as described in the accompanying Vision Statement.
- 3.6 As demonstrated in the Mid-Mersey SHMA 2015, there is strong market demand for housing in Lymm however delivery of new properties has been limited over a number of years. In 2014 median sales volume in Lymm was £244,950 compared with £150,000 in Warrington Town. Paragraph 2.110 of the SHMA states that:

“Lymm has a significant proportion of premium market residences. Agents told that the village character in the area and high quality shops and services with access to good schools were key factors.”

- 3.7 As a result affordability is a key issue which the proposed scheme could contribute to helping with. Indeed the Affordable Housing Financial Viability Assessment shows that Lymm is one of the most unaffordable places in the entire Borough.
- 3.8 Given the historically low growth; excellent services and amenities; high demand for housing; lack of suitable sites within the settlement boundary, and significant affordability issues Lymm represents a location which urgently requires new housing development in order to facilitate social mobility and maintain the vitality of existing services. Story Homes strongly supports the release of sustainably located Green Belt sites, including land at Reddish Lane, to assist in meeting acute local housing needs.

Case for Green Belt Release

Exceptional Circumstances

- 3.9 It is clear from the evidence provided by WBC that there is insufficient land capacity outside the Green Belt to meet its housing and employment land requirements. Therefore, in the absence of an agreement for neighbouring authorities to accept this surplus, Warrington's entire housing need must be accommodated within the administrative area. It is therefore considered that exceptional circumstances exist in accordance with the NPPF and Green Belt land should be released from the Green Belt to meet WBC's development needs.

Five Purposes of including Land within the Green Belt

- 3.10 The Government attaches great weight to the Green Belt which serves five purposes as defined in paragraph 80 of the NPPF.
- 3.11 The site is assessed against each of the five purposes of including land within the Green Belt as defined in paragraph 80 of the NPPF. It has been established that Story Homes have concerns regarding the methodology used in the preparation of the Warrington Green Belt Assessment and the conclusions drawn. However, it is acknowledged that the purpose of the Green Belt Assessment is to inform the Plan making process however, it is for the Council to determine which sites are suitable for Green Belt release based on wider matters such as housing need and sustainability.
- 3.12 This assessment therefore seeks to demonstrate that the site no longer meets all five purposes of including land within the Green Belt; that exceptional circumstances exist for its release and allocation for housing in the Local Plan Review and that it is a highly sustainable site when assessed against the three dimensions of sustainable development as described in paragraph 7 of the NPPF.

Land at Reddish Lane – Appraisal against the Five Green Belt Purposes

- 3.13 The site taken as a whole is a logical extension to the settlement boundary in a sustainable location, which benefits from the infrastructure and amenities associated with a large settlement such as Lymm. The development of the site would not prejudice the objectives of including land in the Green Belt as defined in the NPPF for the following reasons:

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

- 3.14 The site is not located adjacent to the Warrington urban area and has clearly defined defensible boundaries on all sides. As such, the site makes no contribution to this purpose.

Purpose 2: Prevent neighbouring towns from merging into one another

- 3.15 The development of the site would not lead to the coalescence of Lymm with any other settlement and as such it makes no contribution to this purpose.

Purpose 3: To assist in safeguarding the countryside from encroachment

- 3.16 The site is surrounded by residential development on three sides (to the east, south and west) and is also separated from the wider countryside to the north by the disused railway line which forms the northern boundary. There is also existing encroachment of built development into both parcels through a number of existing residential properties. The remaining land use is agricultural but the setting of the fields is heavily influenced by the surrounding urban fringe and they are not visually connected to the wider open countryside to the north. The degree of openness is further moderated by the existing development/ properties located within the parcels. Views are limited to those gained across the two adjacent parcels (LY8 & LY9) only and not '*long line*' as reported in the assessment text, they are contained by built form on the edge of Lymm/Rushgreen and the embankment of and vegetation along the Trans Pennine Trail. Indeed, a substantial woodland buffer will be planted along the boundary of the site which will result in little or no views from the Trans Pennine Trail. The current land use does not serve a beneficial use in terms of Para 81 of the NPPF and there are no public rights of way across the site. Overall, the site makes a moderate contribution to this purpose.

Purpose 4: to preserve the setting and special character of historic towns

- 3.17 As noted above, a desk based assessment only was applied to this Green Belt assessment and it is considered that this has led to an incorrect assessment in relation to the site which has over-emphasised any potential role they have in preserving the setting of the nearby conservation area.
- 3.18 There is also an inconsistency in the methodology used to consider the relationship between the Green Belt and the 250m buffer area around the adjacent Lymm Conservation Area. In the stage 1

Assessment this is described as **moderate**, however at stage 2 this same relationship is described as **strong** in relation to parcel LY8 simply due to the proportional extent to which the buffer area extends over the parcel.

- 3.19 Heritage consultants Wardell Armstrong have undertaken a heritage assessment of the site to assess what impact the proposed development would have on designated and non-designated heritage assets within the vicinity of the site.
- 3.20 The assessment concludes, following guidance published by Historic England that there will be no impact to the Grade II listed Tanyard Farmhouse and 68 Rush Green Road. The evidential, historical and aesthetic values of Lymm Conservation Area will be unaffected by development within the Site. Similarly, the setting to the Conservation Area will be unaffected through the proposed development.
- 3.21 Overall, the site makes a weak contribution to this purpose.

Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 3.22 The Green Belt boundary is tightly drawn around Lymm and there is very little previously developed land which could accommodate its acute development needs. In light of this, it is considered that the methodology used is fundamentally flawed. On this basis, parcels LY8 and LY9 should be assessed as having a weak contribution to this purpose.

Conclusion

- 3.23 Based on the assessment above, the site should be re-classified as making a weak contribution to the Green Belt as shown in table 1 below:

Table 1 - Assessment against the five Green Belt purpose

Green Belt Purpose	Parcel LY8	Parcel LY9
1 to check the unrestricted sprawl of large built-up areas	No contribution	No contribution
2 to prevent neighbouring towns merging	No contribution	No contribution
3 to assist in safeguarding the countryside from encroachment	Strong Moderate contribution	Strong Moderate contribution
4 to preserve the setting and special character of historic towns	Moderate Weak contribution	Moderate Weak contribution
5 to assist in urban regeneration	Moderate contribution	Moderate contribution
Overall assessment	Strong Weak contribution	Moderate Weak contribution

- 3.24 In summary, the site is a well self-contained with strong defensible boundaries which makes a weak contribution to the five purposes of including land within the Green Belt. Its release would represent a logical extension to the Lymm settlement boundary, effectively ‘rounding off’ the area to the north.

Indicative Masterplan

- 3.25 The indicative Masterplan has evolved following the assessment of constraints and opportunities, and a consideration of key design principles. It is at an early stage and we look forward to discussing it with Warrington Borough Council.
- 3.26 The Masterplan provides a framework for the delivery of 166 new family and affordable homes, at a gross density of 23 dwellings per hectare across the 7.23 hectare site. It is envisaged that there will be a mixed and sustainable community, comprising a range of 2, 3, 4 and 5 bed homes. The new homes will embody the key principles of sustainability whilst retaining a consistent reference to the character of Lymm.
- 3.27 The site will provide a coherent structure that interlinks open spaces with built form and includes high quality and overlooked routes for safe movement. It will seek to maximise privacy, whilst creating street scene interest through the juxtaposition of buildings, utilising varied building forms and setbacks. Existing features, such as trees and hedgerows, will be retained as part of a high quality and deliverable landscape strategy. The site will create a strong network of open spaces and green corridors throughout the site. These spaces function individually, but will together add up to a comprehensive green environment which permeates throughout the development.

Sustainable Development Principles

- 3.28 The presumption in favour of sustainable development is the ‘golden thread’ running through the NPPF. Paragraph 7 identifies that there are three dimensions to sustainable development: economic, social and environmental. The development of approximately 165 new homes on this site in Lymm will deliver significant and lasting economic, social and environment benefits to the local community as detailed below:

Economic

- 3.29 The economic benefits which can be expected to be delivered by the proposed scheme are described below:
- **Labour force** - the site will bring new working age families in Lymm. This will be crucial to ensure that there is a resident labour force in the area, which can underpin sustainable economic growth without resulting in large increases in in-commuting from elsewhere in the region;

- **New jobs** – building new homes creates significant numbers of new jobs in constructions, in the supply chain and in related services such as shops and leisure centres;
- **Increased spending power** – new homes will bring new economically active families into Lymm, who will spend their disposable income in local shops and services. This will boost businesses and increase local vitality and the viability of local services and facilities;
- **Increased revenue** – the new homes will substantially increase Warrington Borough Council’s revenue base as a result of significant increases in Council Tax income; and
- **New Homes Bonus** – 165 new homes will result in a New Homes Bonus payment of **£979,163**.

Social

3.30 The proposed development would also secure significant social benefits, positively contributing to creating a strong, vibrant and healthy local community. These benefits include:

- **Family homes** – the site can address the growing need for new high quality and modern family homes in Lymm. It will deliver a wide range of new homes in terms of type and size, to meet the needs of different families in the community;
- **Affordable homes** – the new community will include a substantial number of new affordable homes, such as starter homes and affordable rented houses. This will significantly enhance opportunities for home ownership, helping less affluent families and young first time buyers to get onto the housing ladder;
- **Open Space** – the development will provide a significant amount of public open space for new and existing residents to enjoy. There will be enhanced connectivity to recreation facilities beyond the site for the existing housing development to the west, south and east; and
- **Trans Pennine Trail** – enhanced access to the Trans Pennine Trail to the north to provide opportunities for walking and cycling and connections to these established routes will improve health and wellbeing.

Environmental

3.31 The environmental benefits that would be secured by the scheme are described below:

- Environmental improvements – the new high quality landscape proposed can provide new and enhanced habitats to increase the biodiversity value of the site, whilst providing new landscape features and greenspaces for the community to enjoy;
- New drainage infrastructure – the landscape strategy for the site includes a Sustainable Urban Drainage Scheme (SuDS);
- Recreational resources – the site will provide new open space and green infrastructure for the local community to enjoy and spend time in; and
- Access – as the site is within a 5 minute walk of the village centre, this will encourage new residents to use pedestrian and cycle routes into the village rather than using the private car. Development to the east, west and south of the village will result in a dependency on the private car given the distance to the services and facilities within the village centre.

3.32 It is clear that there would be significant economic, social and environmental benefits resulting from the scheme proposals which should be weighed in favour of releasing it from the Green Belt and allocating it for housing in the Local Plan Review.

Deliverability

3.33 In accordance with footnote 11 of the NPPF there are no barriers to the delivery of the scheme proposals and the site should be seen as deliverable in that it is available now, offers a suitable location for development now, and is achievable with a realistic prospect that housing will be delivered on site within 5 years. Story Homes is an established housebuilder and can commence work as soon as possible following planning.

4 CONCLUSION

- 4.1 Story Homes supports the preparation of the emerging Local Plan. However, to ensure that the Borough's pressing and growing development needs – and its aspirations for growth – can be met as soon as possible, the Local Plan must be progressed swiftly and with urgency. The Government has set out a requirement for all LPAs to prepare a Local Plan by 2017.
- 4.2 It must be acknowledged that sustainable settlements such as Lymm must grow if the Borough is to pursue sustainable growth and that there are exceptional circumstances to justify the release of Green Belt land as detailed in paragraph 2.46 of this representation. In this context, the accompanying Vision Brochure sets out the opportunity presented by Reddish Lane, which is controlled and promoted by Story Homes. It is capable of providing a new, high quality community, which incorporates attractive and well-built family homes as part of a sustainable natural and tranquil environment, integrated with new green and blue infrastructure.
- 4.3 Land at Reddish Lane represents the most sustainable Green Belt sites and provides a weak contribute to the 5 purposes of including land within the Green Belt. The site is self-contained and within walking distance of Lymm Village centre. There are constraints which would prevent this site coming forward for development within 5 years.
- 4.4 It will contribute towards Warrington meeting its objectively assessed housing need and can be brought forward using a comprehensive masterplanning process, with significant involvement from both WBC and local community.
- 4.5 Story Homes are committed to delivering the site and look forward to working collaboratively with WBC to progress the proposals for the site and welcomes any feedback.
- 4.6 We trust that these representations will be taken into full consideration in the preparation of the Preferred Options consultation document. We would be grateful if you could ensure that we are on the mailing list to receive notifications of future Local Plan Review updates and consultations.

Appendix A – Site Location Plan

Appendix B – Vision Statement