



Dear Sir/Madam

Please see attached Story Homes representations to the Warrington Preferred Options Consultation and Call for Sites Consultation which closes at 5pm today.

To respond directly to the Preferred Options document we attach:

- Written representation 'Warrington Pref Opt Rep'
- Lymm, land at Reddish Lane - Story Homes vision document (please note a hard copy will be submitted to the council on Monday)

To respond directly to the call for sites consultation we attach:

- Lymm, land at Reddish Lane – SHLAA site submission (copy version)
(For original pdf of SHLAA proforma please contact me if required).

Should you require any further information please do not hesitate to contact me.

Please acknowledge receipt of this email submission

Kind Regards

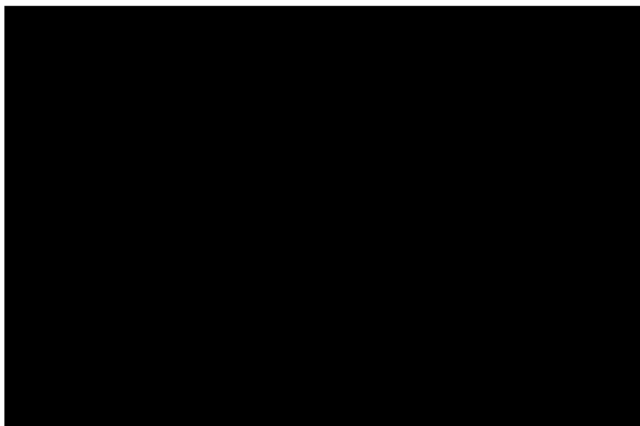


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<i>For Office Use Only</i>	
Date received:	
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Plotted:	
Site Ref:	
SHLAA Site Ref:	

'Call for Sites'

Warrington Borough Council Local Plan Review

Call for Sites Registration Form

October 2016

Please note this 'Call for Sites' is for five or more dwellings or economic development on sites of 0.25 ha (or 500sqm of floor space) and above, Gypsy, Traveller and Show People and Minerals and Waste sites.

The identification of sites does not imply that the Council considers that the site is suitable for development, either now or in the future. It cannot be taken as representing either an intention to allocate these sites, or as a material consideration in the determination of a planning application.

Potential sites that have been identified will be further tested through the Plan-making process, including through the Spatial Distribution and Site Assessment Process, Sustainability Appraisal/Strategic Environmental Assessment, several stages of public participation and independent examination.

Please also note that all the responses and information received as part of the 'Call for Sites' will be published and made available for public viewing as part of the open and transparent Plan making process.

NOTE: Please read the accompanying guidance note [here](#) before completing this form and complete a **separate** form for each site that you are submitting to the Council.

Please return your completed form and any accompanying supporting material to Planning Policy, Warrington Borough Council no later than 5.00pm on Monday 05th December 2016.

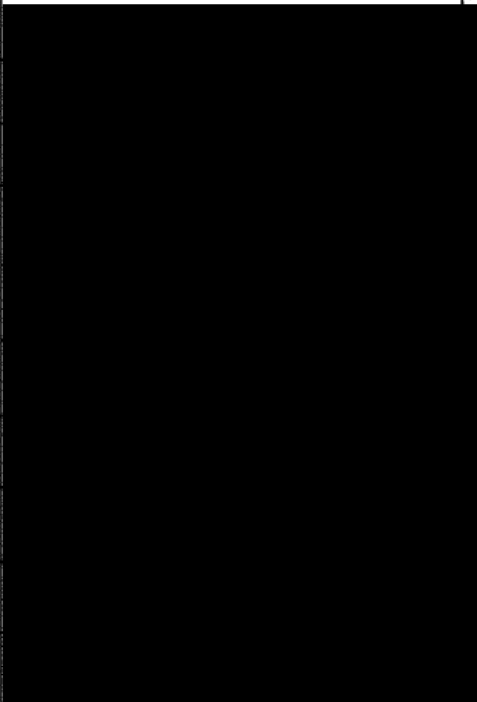
By e-mail: ldf@warrington.gov.uk

By post: Planning Policy, Warrington Borough Council, New Town House, Buttermarket Street, Warrington, WA1 2NH

Should you require further advice and guidance on completing this form, please contact the Planning Policy Team by telephone on 01925 442841 or by e-mail to ldf@warrington.gov.uk

(1) Your Details

Please provide your contact details and those of your agent (if applicable). Where provided, we will use your Agent's details as our primary contact.

	Your details	Your Agent's details	
Name			
Position			
Organisation			
Address			
		Town	
		Postcode	
Telephone			
Email address			

(2) Site Details

Please provide the details of the site you are suggesting. If you are suggesting more than one site, please use a separate form.

Name of site /other names it's known by	Land at Reddish Lane, Lymm	
Address	Land at Reddish Lane	
	Town	Lymm
	Postcode	WA13 9PN
Ordnance Survey Grid Reference	Easting : 368654	Northing : 387708
Site area (hectares)		
Net developable area (hectares)		
What is your interest in the site? (please tick one)	Owner <input type="checkbox"/>	Lessee <input type="checkbox"/>
	Prospective Purchaser <input checked="" type="checkbox"/>	Neighbour <input type="checkbox"/>
	Other <input checked="" type="checkbox"/>	Please state: Option to buy

Please Note: It is essential that you provide a map showing the site's location and detailed boundaries for each submission.

(3a) Proposed future use(s)

Please indicate the preferred use that you would like the site to be considered for. Please also indicate any other uses you would consider acceptable. If you wish the site to be considered for a mix of uses, please tick all uses that apply.

	Residential	Gypsy & Travellers	Employment	Retail	Leisure	Other*
Preferred future use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Alternative future use(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Potential Capacity	houses: 165	Number of Pitches:	SqM	SqM	SqM	SqM
	or flats:					
Employment Use Class (E.g. B1)						
* If "Other", please indicate which use(s):						
Potential Density	Approximately 30 Dwellings per Hectare					
	Has any design, viability, master planning work or other studies been undertaken for any proposed use?			Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

(3b) Proposed future use(s) - Minerals and Waste

Details:

(4) Site Ownership

Please record the site ownership details. If there are more than three owners, please record the fourth owner, etc. on a separate sheet. Please indicate the extent of individual landholding(s) on the site map.

If you do not know who owns the site, please state so below.

		Owner 1	Owner 2	Owner 3
Name				
Address				
	Town			
	Postcode			

Or: I do not know who owns the site

Has the owner (or each owner) indicated support for proposed redevelopment?
Please also record these details for the 4th and subsequent owners (where necessary).

Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Don't know	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Are there any Restrictive Covenants & Ransom Strips affecting the site?

No

(5) Market Interest

Please choose the most appropriate category below to indicate what level of market interest there is in the site:

		Any comments
Site is owned by a developer	<input type="checkbox"/>	
Site under option to a developer	<input checked="" type="checkbox"/>	Site is under option to Story Homes
Enquiries received	<input type="checkbox"/>	
Site is being marketed	<input type="checkbox"/>	
None	<input type="checkbox"/>	
Not known	<input type="checkbox"/>	

The site is under option to Story Homes, a family owned five star house builder based in the North West of England. Story Homes have multiple developments across the North of England and Southern Scotland, with an emphasis on high quality family homes that respond sensitively to local character and are set within attractive landscaped areas of open space.

Subject to policy change Story Homes will bring this site forward for development.

(6) Site Condition

Please record the current use(s) of the site (or for vacant sites, the previous use, if known) and the neighbouring land uses.

Current use(s)	Agricultural	
Neighbouring Uses	North; Community facilities, East; Agricultural, South; Residential, West; Residential	
If vacant	Previous use(s)	
	Date last used	

What proportion of the site is made up of buildings, and what proportion is (open) land?

Proportion covered by buildings	0 %	Proportion not covered by buildings	100 %
---------------------------------	-----	-------------------------------------	-------

If there are buildings on the site, please answer the following questions:

How many buildings are there on the site?		buildings
What proportion of the buildings are currently in use?	% in use:	%
	% derelict:	%
	% vacant:	%
Are any existing buildings on the site proposed to be converted?		

For the **parts of the site not covered by buildings**, please answer these questions:

What proportion of the land is currently in active use?	100	%
What proportion is greenfield (not previously developed)?	100	% (A)*
What proportion is previously developed and cleared?	0	% (B)*
What proportion is previously developed but not cleared? (e.g. demolition spoil, etc.)	0	% (C)*

* A plus B plus C should add to 100%.

Please provide any additional comments on a separate sheet if necessary.

(7) Constraints to Development

Please tell us about any known constraints that will affect development for the proposed use, details of what action is required, how long it will take and what progress has been made.

Please use a separate sheet where necessary to provide details. If using separate sheets, it would be helpful to make reference there to the particular constraint, e.g (7)(e) – Drainage.

	Yes, No or Don't know	Nature and severity of constraint *	Action needed, timescales and progress	Confirmed by technical study or by service provider?	
				Yes	No
a) Land contamination	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Land stability	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Mains water supply	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Mains sewerage	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Drainage, flood risk	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Tree Preservation Orders	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Electricity supply	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Gas supply	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Telecommunications	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Highways	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
k) Ownership, leases etc.	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
l) Ransom strips, covenants	No			<input checked="" type="checkbox"/>	<input type="checkbox"/>
m) Other (Please provide details)				<input type="checkbox"/>	<input type="checkbox"/>

(8) Site Availability

Please indicate when the site may be available

Excluding planning policy constraints, when do you believe this site could be available for development?

Immediately Yes (Note: to be "immediately available", a site must be cleared, unless being considered for conversions.)

If not immediately, please state when it could be available:

If the site is not available immediately, please explain why – e.g. the main constraint(s) or delaying factor(s) and actions necessary to remove these:

(9) Any Other Information

Please tell us anything else of relevance regarding this site if not already covered above that will ensure that it contributes positively to the achievement of sustainable development. Please use a separate sheet/s if necessary.

Please refer to Story Homes (WYG) Representations submitted and Preferred Development Options consultation in addition to the Supplementary Vision Document.

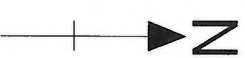
This site will contribute to market housing, affordable housing and public open space, in addition to investment in the local community facilities. (Please see attached Location Plan)

**Planning Policy– Warrington Borough Council,
New Town House, Buttermarket Street, Warrington, WA1 2NH**

ldf@warrington.gov.uk
01925 442841

This form is available in other formats or languages on request.

Potential Site: 



DEVELOPMENT - Reddish
Lane, Lymm

Not to Scale:



Warrington Preferred Development Option

Land at Reddish Lane, Lymm

Representation by Story Homes

September 2017



Document control

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Appendix 1: Site Location Plan

1.0 Introduction

- 1.1.1 This document presents Story Homes representation response to the Warrington Preferred Option consultation as part of the Local Plan Review by Warrington Borough Council (WBC).
- 1.1.2 Story Homes have an interest in land located at **Reddish Lane in Lymm**, which is the subject of this representation.
- 1.1.3 Please refer to Figure 1 to identify the site location. We consider the land at Reddish Lane to be a sustainable site which can make a significant positive contribution to helping meet Warrington's housing need. The representation is being made therefore to support the growth of Lymm as a larger outlying settlement of Warrington with the delivery of new housing to meet its needs, and with the retention of Green Belt land where appropriate. We consider the land at Reddish Lane to be the most suitable and sustainable site in Lymm to meet its housing needs. We therefore propose the release of this site from the Green Belt and its allocation for housing.

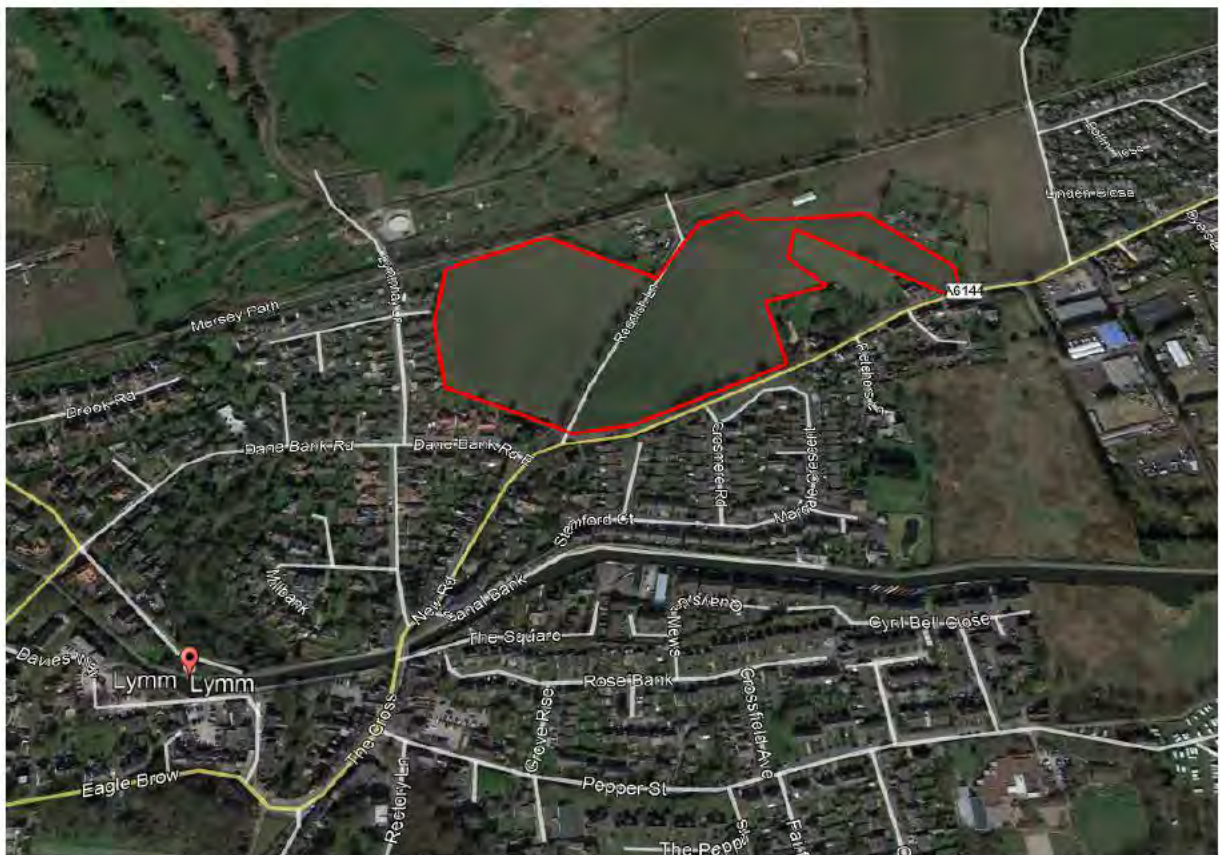


Figure 1: Site Location



Representation for Story Homes

- 1.1.4 WYG have been appointed by Story Homes and have prepared this representation on their behalf. A wider team of specialists have been appointed and are providing supporting workstreams that are summarised within this representation. This includes APD (Astle Planning & Design Ltd), Croft (transport) and other technical specialists.
- 1.1.5 This representation follows the previous stage Local Plan response prepared by Story Homes for the site. We endeavour to build upon this work, summarising additional technical work and presenting new arguments for a realignment of the Green Belt in this location and subsequent allocation of the site.
- 1.1.6 Story Homes have also sought to lead a positive engagement process with local stakeholders in respect of the site. This has involved making contact with ward and parish councillors in order to help them understand the nature of the proposals and to put forward a range of benefits for the community. Due to the run-up to the 2017 General Election and the preparation of the Warrington Local Plan, efforts to engage with stakeholders has been largely unsuccessful to date but work is ongoing and positive engagement is a priority for Story Homes. Further progress will be summarised in representations at subsequent consultation stages.
- 1.1.7 This document is structured to look first at the Preferred Development Option consultation document, followed by a look at several key supporting evidence base documents, before then assessing the merits of the site.
- 1.1.8 We have also prepared a 'Vision Document' for the site. This is a visual, attractively presented A3 document that summarises key points from the representation in a shortened, non-technical and easy-to-read format, alongside relevant supporting images. The vision document is intended to support this representation (and is attached to the submission), and is chiefly intended for a wider community and stakeholder audience.



Representation for Story Homes

1.2 About Story Homes

- 1.2.1 The Story Difference – comprising a commitment to design quality, place-making and customer experience – will be instrumental in delivering an exemplary new development which Warrington Council can be proud of.
- 1.2.2 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 of England and South of Scotland. 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.
- 1.2.3 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.
- 1.2.4 Story Homes have been awarded the top ‘5 star’ rating in the house building industry’s annual customer satisfaction survey for the 4th year running since becoming eligible. 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.
- 1.2.5 Story Homes’ presence in the North West is growing significantly. They have been awarded 3 UK Property awards including ‘Best Residential Development’ in 2016 and 2015 for their sites, Brookwood Park in Kirkham and High Wood in Lancaster. In addition, they were also awarded ‘North West Housebuilder of the Year’ at the North West Insider Property awards in January 2017.
- 1.2.6 Story Homes strives to go that extra mile by:
- Employing local people and supporting local trade
 - Using local materials where possible
 - Enrolling new apprentices into their ‘Story Apprentice Scheme’. Story Homes will directly employ the apprentice on completion of the scheme or will support the candidate in setting-up their own business that would subsequently be a sub-contractor to Story Homes.



Representation for Story Homes

- Enrolling new Graduates to the 'Story Graduate Scheme' across their departments seeking new talent and fresh ideas.
- Supporting local communities and being a good neighbour in the communities they impact upon
- Building beautiful homes that continue to look great in years to come and enhance communities
- Providing 'affordable' homes for local people
- Collecting detailed feedback from customers and identifying and taking action on areas for improvement



2.0 General Commentary on Preferred Development Option

2.1.1 This section presents Story Homes' response to the Local Plan Preferred Development Option (Regulation 18 Consultation) published in July 2017. This principally concerns strategic approaches to meeting housing needs across the Borough.

2.2 DCLG Consultation Proposals on Objectively Assessed Need (OAN)

2.2.1 Story Homes also wish to provide some interim commentary on the proposed Department for Communities and Local Government (DCLG) consultation paper 'Planning for the right homes in the right places: consultation proposals' released Thursday 14th September.

2.2.2 The Government have announced proposals to simplify the calculation of OAN, reducing the time and cost for LPAs in arriving at their housing need figure and to encourage transparency and certainty for members of the public. We do not wish to go into detail here about the implications of the methodology in assessing housing need through the proposed formula; rather we only wish to support Warrington Borough Council in their preparation of a local plan that seeks to balance housing delivery with economic growth.

2.2.3 We support the Council's economic aspirations and transition from new town to 'new city' and we would encourage the Council to maintain the envisaged housing target as set out in the Preferred Development Option going forward to submission stage of the Local Plan. Within the consultation document, DCLG encourage deviation from the proposed approach where, as a result of strategic infrastructure or increased employment, an LPA wishes to increase the housing requirement to realise its ambitions. DCLG confirm that they propose to amend planning guidance so that a Planning Inspector is advised to work on the assumption that this approach is sound (Para 46).

2.2.4 Story Homes will continue to support Warrington's growth aspirations and encourage the Council to maintain their proposed housing requirement through to the submission of the local plan. This will realise social and economic benefits throughout the Borough in addition to reducing any potential delay to the preparation and adoption of Warrington's local plan.

2.3 Meeting Housing Need – General Comments

2.3.1 Story Homes therefore support the identified OAN requirement to provide 1,113 new homes per year in the period 2017-37. Once the 5% buffer and provision for a backlog of 847 units is applied this requirement becomes 1,211 new homes per annum (in accordance with Table 1,

Representation for Story Homes

p16, of the Preferred Development Option). We note that the Council conclude that Green Belt release will be required to meet this target and we agree with and support this conclusion.

2.3.2 Achieving the number of homes required within the plan period relies on a very ambitious increase in the scale of housing delivery. The rate of 1,211 homes per year is approximately double the rate of annual provision over the last seven years (see below). However, it must be noted that the figure is lower than the rate of annual provision in the pre-recession years of 2006/07 and 2007/08. It is therefore clear that Warrington can accommodate and then sustain these rates of housebuilding which will coincide with the Council's economic growth aspirations.

Table 2.1 - Previous rates of housebuilding completions (extracted from 2015 SHLAA Final Report Table 3.8 and Annual Monitoring Report 2016)

Year	Completions
2006/07	1,362
2007/08	1,565
2008/09	633
2009/10	388
2010/11	527
2011/12	600
2012/13	647
2013/14	693
2014/15	687
2015/16	595

2.3.3 In order to meet this very ambitious increase in the scale of delivery we believe that it will be very important to prioritise the release of the most deliverable sites, especially for the first five years of the Plan period. These are likely to be greenfield sites, relatively free of constraints, and located in attractive market areas. Green Belt sites put forward in the Call for Sites exercise, such as Reddish Lane in Lymm would make a good candidate for a priority site.

Representation for Story Homes

- 2.3.4 The proposed strategy (as set out in Table 1 in the Preferred Development Option) relies on Green Belt sites being capable of delivering 440 units per year (8,791 in the 20 year plan period) and sites within the urban area delivering 771 units per year (15,429 in the plan period); result in an overall housebuilding rate of 1,211 units per year. We believe that this balance, with only 36% of the sites being located in the Green Belt, will not enable the required doubling housebuilding delivery rate to be met. We also believe that the capacity of urban land has been overestimated (see 2.2.8 below). In order to meet the required annual delivery rate we therefore believe that a greater number of Green Belt sites need to be identified for delivery in the first 5 years of the plan period in particular and that the ratio of Green Belt sites needs to substantially increase from 36% of the allocated land.
- 2.3.5 Allowing an appropriate buffer will also be important in helping to ensure that this ambitious delivery target can be met. At present the strategy allows only for the 5% buffer that is required by the National Planning Policy Framework (NPPF). There is a very real risk that sites not being promoted by a developer may not come forward at the rate envisaged, especially if a high reliance on the urban area is maintained. A buffer that offers flexibility then becomes crucial, especially for the first five-year period. We believe that the Council's strategy should be flexible enough to allow Safeguarded Land to come forward within the Plan period if allocated sites are not proving deliverable within the required timescale. We provide further commentary on this under Safeguarded Land below.

Response to Evidence Base

- 2.3.6 We note that the **Strategic Housing Market Assessment** (SHMA) has been updated following the Issues and Options Stage consultation. We welcome the fact that the economic activity rate forecast now more closely reflects best practice and as a result generates a more realistic picture of Objectively Assessed Need (OAN).
- 2.3.7 With regard to the 2015 **Strategic Housing Land Availability Assessment** (SHLAA), we support the use of variable developable area ratios (75%, 90% and 100%) to estimate site capacity. This provides a useful 'rule of thumb' to estimate collective capacity across many sites. However, when more information is known about individual sites this should be used to provide a more accurate estimate of capacity that respond to site conditions. Similarly, different densities of development will be appropriate for different sites, as will differing build rates. This can then inform a more accurate estimate of total capacity for the subsequent Local Plan stage. We have provided such information with regard to our site in Section 7 of this document.



Representation for Story Homes

- 2.3.8 **Urban Land Capacity Study** – we note that the Preferred Option has been informed by the Urban Land Capacity Study in assessing the amount of housing that can potentially be accommodated in the inner urban area of Warrington. Whilst we support the principle of maximising the capacity of housing on brownfield development in the urban area, we have concerns with this Study, which we feel significantly overestimates the amount of development that could be accommodated within the urban area. As a result, we consider that more land will need to be released from the Green Belt than is currently proposed. These concerns are explained in Section 6 of this document.
- 2.3.9 **Green Belt Assessment** – we also have specific comments regarding the Green Belt Assessment, which are also set out in Section 6. The main point is that we consider that parcel LY8, which corresponds to part of our Reddish Lane site, should be re-designated as making a 'moderate' contribution overall. Our views in this regard are supported by the Planning Inspector on the 1994 Local Plan (this is summarised in Section 6 below).
- 2.3.10 We also note that, given the small amount of 'weak' contribution land, release of 'moderate' contribution land will be required in Lymm in order to meet its housing needs.
- 2.3.11 Further commentary on evidence base documents are provided in Section 3.

2.4 Safeguarded Land

- 2.4.1 We welcome the approach to safeguard further land in the Green Belt for potential housing needs for ten years beyond the Plan period. The principle of safeguarding land reflects best practice in plan-making and guidance within the NPPF. However, we have serious concerns with the methodology for both calculating the amount of land to be safeguarded for housing and for deciding where this is to be geographically located. If the Council is going to identify safeguarded land to meet future needs then we feel it is important that this exercise is done accurately to properly plan for future needs. We have three following points to make in this regard.
- 2.4.2 Firstly, why is the lower annual provision target of 955 units per annum applied to the safeguarded land, and not the plan period target of 1,113 homes per annum? Is the Council assuming that a lower rate of economic growth will apply after the plan period? There are, of course, difficulties in making projections so far into the future but we feel the sensible approach would be to apply the same figure beyond the Plan period as during it. We consider that to reduce this figure would have a significantly adverse impact upon economic growth, especially given the Council's ambitions to progress Warrington as a 'New City' from its current



New Town status.

- 2.4.3 Secondly, whilst we accept that the housing target already has a 5% buffer applied, we do not agree that this buffer will no longer be required after the Plan period. The same issues are likely to apply, with not all sites being capable of being brought forward for delivery and so applying a 5% would be sensible, and in line with the NPPF. Therefore, we do not agree that a nine-year requirement should be applied for ten years beyond the Plan period. If the buffer has had to be used for the Plan period it is likely to be because allocated sites have not come forward and may not do so. We therefore consider it incorrect to see this buffer as additional supply beyond the Plan period. We consider that the correct approach would be to apply ten years at 1,113 units per annum plus a further 5% in order to identify a ten-year supply of Safeguarded Land, meaning that the Safeguarded Land should be capable of accommodating 11,168 units.
- 2.4.4 Thirdly, we consider that there is a weak logic and lack of justification to the consideration that 36% of the new homes will be delivered in the Green Belt in line with projections for the Plan period. As discussed elsewhere in this document, we feel that the Urban Capacity Study significantly overestimates the amount of housing that can be delivered in the urban area during the Plan period and so disagree that 36% is a realistic figure for Green Belt provision. Furthermore, the focus on developing urban land first during the Plan period is likely to mean that the supply of such sites will be exhausted by the end of the Plan period; therefore it is highly likely that the requirement for Green Belt land will be greater and not less for the period after the end of the Plan period (2037). In other words, with all potentially suitable urban sites having been allocated in the new Local Plan, what new urban sites, other than potential windfall sites, might remain for the period ten years after? We doubt that this would be sufficient to meet 64% of the projected demand.
- 2.4.5 With regard to the Fiddlers Ferry site (as referred to in para 3.6 of WBC's Preferred Development Option), on which the strategy heavily relies for potential brownfield development land, this is likely to be heavily constrained and contaminated given its existing use. This will affect the viability and timescale for it coming forward for housing, if indeed it does. However, even if we take a best-case scenario the full site is approx. 120 hectares, so assuming that this can be developed at the same rate as applied elsewhere (75% site area @ 30 dph) then this could deliver up to 2,700 units. This still only represents 24% of the projected need for the Safeguarded Land (11,130 as explained above, discounting the buffer) and so does not materially affect the fact that future capacity within the urban area is being greatly overestimated. There is also an inherent risk to an approach that 'puts all the eggs into

one basket' in this way and that large strategic sites can often take much longer to deliver.

Distribution of Safeguarded Land

- 2.4.6 Safeguarded Land, by its nature and on inspection of other Local Plans, is greenfield land at the outer fringes of settlements. In fact, the NPPF (at para 85) specifically instructs local planning authorities to "*identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term needs stretching well beyond the plan period*".
- 2.4.7 Our main objection regarding the location of Safeguarded Land is that it is proposed to be all located to the east of the Garden City Extension in Warrington. There does not appear to be any detailed analysis and justification for locating all of this land at Warrington. This approach does not allow any of the outlying settlements to meet their housing requirements beyond the Plan period or to provide an additional land resource to offer the flexibility needed to enable their housing needs within the Plan period to be met. Further concentrating growth in Warrington may also weaken the ongoing sustainability of outlying settlements, where local services need to be supported by sufficient housing numbers. It is also likely to force existing residents of the outlying settlements to move to Warrington when they are in need of a new (or first) house, and we believe this does not represent a fair and equal approach to all residents of the Borough. For these reasons, we object to the current spatial approach to Safeguarded Land and recommend that a similar proportion of Safeguarded Land is designated to the outlying settlements.
- 2.4.8 As the Plan develops there will then be a need to consider more accurately how much Safeguarded Land should be designated for each settlement. We feel that it is important to ensure that each settlement has an appropriate amount of Safeguarded Land to meet their own housing needs, and that this should be determined by a proper consideration of this need, rather than by an overly supply-led approach. This follows our same logic for the allocation of housing for each settlement, as set out in Section 3 of this document.
- 2.4.9 In addition to meeting housing needs beyond the Plan period, we consider that Safeguarded Land should also form the first line of supply if new housing is needed during the Plan period which cannot be delivered on allocated sites (whether by sites not coming forward or by unmet housing needs leaving the LPA without a five-year housing supply). This view has been supported by Inspectors in appeal decisions (for example APP/P2365/W/15/3132594 Wainhomes Developments Ltd vs West Lancashire Borough Council, 2015). The 'housing delivery test' in the Government's Housing White Paper (2016) requires action to be taken if



delivery rates fall below 95% of the annual housing requirement. We recommend that this is used as a trigger to allow the development of Safeguarded Land. This trigger could be applied to settlements independently (i.e. only allowing Safeguarded Land in Lymm, for example, to be developed if delivery rates in Lymm fall below 95%).



3.0 Spatial Distribution of New Housing

- 3.1.1 WBC considered and assessed several strategic options for meeting housing needs spatially. In this section, we respond to this emerging strategy for the spatial provision of new housing.
- 3.1.2 Option 2 proposes that the majority of Green Belt release is adjacent to main urban area (Warrington) with incremental growth in outlying settlements. We agree that the **high level spatial option 2 should be the preferred option** (as set out at para 4.49 of the Preferred Development Option). We believe that every settlement should have its own needs met through appropriate growth. Put simply, we do not believe that an existing resident of an outlying settlement should be forced to move to Warrington when they are in need of a new home.

3.2 Approach to Growth in Warrington

- 3.2.1 One should first consider the proposed approach for growth of Warrington as this is where the vast majority of new homes are to be located, and this will have significant implications for housing allocations across the Borough.
- 3.2.2 On analysing the proposed Option 2 approach, it soon becomes apparent that the proposed distribution of new homes represents a significant re-distribution of population to the Borough's main town. The tables below, using the existing figures from the Preferred Development Option, show that the percentage of homes in Warrington would increase from 86.3% persons to 95.1% or 96.4% persons if Safeguarded Land is also taken into consideration. This represents a significant increase.
- 3.2.3 Whilst this may be the intention of the Preferred Development Option, it is a rather radical approach that, we feel, has not been made sufficiently transparent in the Preferred Development Option, or suitably justified and evidenced. By concentrating growth in Warrington, by more than a 10% shift, there will be knock-on effects to the outlying settlements and their long-term sustainability and these effects need to be fully understood. In our view, a better approach to the distribution of new homes would be to preserve the existing balance of populations within an overall context of growth for all settlements. We explore this further at 3.3 below.

Table 3.1 – Proportion of housing target between Warrington and outlying settlements

Settlement	Population	% Total Popn	Proposed new homes (Table 22)	% Total total popn after delivery (@ 2.35 people per home)
Warrington	165,456*	86.3%	23,030	95.1%
- within urban area			(15,429)	
- Green Belt release			(7,601)	
Lymm	11,192	5.8%	500	2.1%
Culcheth	6,644	3.5%	300	1.2%
Burtonwood	3,219	1.7%	150	0.6%
Winwick	1,954	1.0%	90	0.4%
Croft	1,367	0.7%	60	0.2%
Glazebury	1,123	0.6%	50	0.2%
Hollins Green	837	0.4%	40	0.2%
Total	191,792	100	24,220	100%

* Warrington urban area, mid 2016 estimate [ONS, 2017]

Table 3.2 – Proportion of housing target between Warrington and outlying settlements, including Safeguarded Land

Settlement	Population	% Total Popn	Proposed new homes (Table 22)	% Total total popn after delivery (@ 2.35 people per home)
Warrington	165,456*	86.3%	23,030	96.4%
- within urban area			(15,429)	
- Green Belt release			(7,601)	
- Safeguarded land			(8,595)**	
Lymm	11,192	5.8%	500	2.1%
Culcheth	6,644	3.5%	300	1.2%
Burtonwood	3,219	1.7%	150	0.6%
Winwick	1,954	1.0%	90	0.4%
Croft	1,367	0.7%	60	0.2%
Glazebury	1,123	0.6%	50	0.2%
Hollins Green	837	0.4%	40	0.2%
Total	191,792	100	24,220	100%

* Warrington urban area, mid 2016 estimate [ONS, 2017]

** using Preferred Development Option figure for homes requirement for safeguarded land, this is assigned to Warrington whether in urban area or in Green Belt

3.3 Approach to Growth for Outlying Settlements

- 3.3.1 From another perspective, we must also consider the level of growth proposed in Option 2 for the outlying settlements, and the implications that this will have on housing and growth needs for these settlements.
- 3.3.2 The approach to determining the level of housing provision for the outlying settlement appears to have been derived by applying a blanket 10% expansion to each settlement according to their existing population (see Table 2.2 below). We agree that using the existing population is a useful starting point to consider the relative share of new housing for each settlement is a valid approach. However, we consider that applying a uniform 10% figure is an overly arbitrary approach that is unlikely to meet the varied housing needs and reflect the

different characteristics of each settlement. Some settlements, for example, could potentially accommodate up to 15% growth without harming the existing character and with appropriate support from existing and enhanced community infrastructure provision. We have explored this further in Section 4.

- 3.3.3 The actual housing figure applied to the outlying settlements is 1,190 (rather than the rounded 1,000) and we see that the proportion of housing allocated to each settlement very closely matches their relative populations (see table below), proposing a 10% growth for each one. This therefore suggests that existing population was the basis of calculating the proportion of new homes, rather than by considering 'indicative Green Belt capacity' as Table 22 of the Preferred Development Option suggests.

Table 3.3 – Proportion of housing target across outlying settlements

Settlement	Population	% Outlying Settlements Total Popn	Proposed new homes (Table 22)	% Outlying Settlements Total New Homes	% Growth of each settlement (@ 2.35 people per home)
Lymm	11192	42.5	500	42.0	10.5%
Culcheth	6644	25.2	300	25.2	10.6%
Burtonwood	3219	12.2	150	12.6	10.9%
Winwick	1954	7.4	90	7.6	10.8%
Croft	1367	5.2	60	5.0	10.3%
Glazebury	1123	4.3	50	4.2	10.5%
Hollins Green	837	3.2	40	3.4	11.2%
Total	26,336	100	1,190	100	10.6%.

- 3.3.4 We agree that this population-based approach is a good initial approach to dividing the number of units across the outlying settlements. Lymm and Culcheth are the two largest settlements by a considerable degree and are therefore likely to have correspondingly higher housing needs. They also have the most extensive range and quality of shops, community facilities and transport links, as summarised in WBC's Settlement Profiles. This makes Lymm and Culcheth the most sustainable locations for housing growth.
- 3.3.5 Instead of applying an arbitrary 10% across the board, however, we feel that the best approach would be to first objectively assess the specific housing needs of each settlement,

considering factors such as demographic and socio-economic profile, economic activity, jobs and community infrastructure provision and existing housing stock. There should then be a pro-active approach to identifying the most appropriate sites to deliver the quantum of housing required. At the moment, we feel that, although more detailed work has been done as part of the Settlement Profiles, this more considered approach has not been reflected in the proposed approach of allocating 10% growth across all settlements.

- 3.3.6 In terms of housing land supply the Preferred Development Option (at para 4.58) states *"from the call for sites exercise, it was established that incremental growth adjacent to the outlying settlements would be capable of accommodating 1,000 dwellings"*. This is true, but in some cases it would be capable of delivering much more than this. The methodology for calculating this is only described in overview in the Settlement Profiles document but appears to involve considering sites that have been put forward in the recent Call for Sites exercise, discounting certain 'fringe' sites that are poorly related to the settlement and then considering only those sites which have been assessed as having 'moderate' or 'weak' contribution to the Green Belt. Whilst we agree with this approach, we consider that a more realistic and opportunity-led approach should be taken whereby sustainability and deliverability are key considerations alongside Green Belt contribution.

Implications for Lymm

- 3.3.7 We have undertaken this exercise ourselves for Lymm and this is provided in Section 5. For comparative assessment, we have used WBC's approach of applying a 75% net developable area (unless the Call for Site response includes a net developable area) and then a density of 30 dwellings per hectare to estimate capacity. In the case of Lymm we have found that there is capacity for around 1,600 homes if all 'moderate' Green Belt sites are included. This indicates that there is a potentially much more land available to support higher rates of growth, and it also highlights the need for a comparative assessment of the sites put forward to decide upon the most suitable sites for allocation in Lymm

We are aware that the Planning Practice Guidance states: *"unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt"*. However, in Lymm we have a situation where a large proportion of the surrounding land parcels have been assessed as making a broadly similar 'moderate' contribution to the Green Belt. Therefore, the comparative level of harm is not likely to be a determining factor when considering how much land to release.



4.0 Growth Options for Warrington

- 4.1.1 The Preferred Development *Options considers several growth options for the town of Warrington. Option 2, which represents a Garden City Suburb of 6,000 homes to the south-east and a Sustainable Urban Extension of 1,800 homes to the south-west, is selected as a preferred option. This approach has implications for proposed housing allocations across the Borough.*
- 4.1.2 We agree that **Option 2** should be the Council's preferred option, and support the Council's intentions to meet housing need in the proposed locations south and south-west of Warrington. We do, however, have concerns about the deliverability of some parcels within the Garden City Suburb allocation and encourage the Council to fully consider further evidence in relation to the site through detailed masterplanning, site capacity, site constraints and representations made to this preferred development options consultation, to fully scope-out likely deliverability. Should it be revealed that the proposed Garden City Suburb area cannot accommodate the total c.6,000 units envisaged then we consider that the remaining units should be redistributed to the outlying settlements and the South-West Warrington extension.
- 4.1.3 The majority of the greenfield allocations for new homes will be located in the Garden City Suburb extension to the south of the town. At approximately 6,000 units this places considerable risk in a strategy whereby a large proportion of the Council's housing need will be met in one location. The extent of the area appears to be largely determined by the Green Belt assessment of a pre-defined land parcel. The willingness and capacity of landowners to deliver this extension is also far from certain, with the area only partially covered by Call for Sites representations. This approach is not delivery or market-led and there may well be significant challenges in delivering all the land parcels within this extension area to deliver the full number of homes envisaged. We also note that there has been strong local opposition, including by local Members, adding further difficulties to delivery. The Area Profile summarises that this extension will require significant new infrastructure: four new primary schools, one secondary school, a district centre, up to three local centres and significant health and recreation infrastructure. Delivering a 6,000 home extension here, within the timescales envisaged, is therefore considered to be extremely challenging.
- 4.1.4 We feel that a better, more flexible approach, would be to follow Option 2 in principle but to allocate more land in the South West Warrington Extension and the outlying settlements, to provide better management of risk and security in delivering the required number of units.

5.0 Growth Options for Outlying Settlements

5.1.1 The Council's strategy has been to consider a series of distinct scenarios for the growth of settlements. As set out in the Area Profiles, these are:

- (i) 'Incremental growth' - based on a level of development that could be accommodated by existing infrastructure, subject to minor expansion of that infrastructure, up to 10% of settlement size.
- (ii) 'Sustainable settlement extension' - based on a new or expanded primary school, taking into account available sites.
- (iii) 'Site maximisation' - where there are 'call for site' options / Green Belt SHLAA sites which could provide a larger scale extension.

5.1.2 Under these scenarios, a 10% growth option has been assessed for each settlement, alongside scenarios for the other two options that consider much larger levels of homes for sustainable urban extensions (i.e. 1,400 homes for Lymm). Unsurprisingly, the incremental growth option is favoured for all the outlying settlements and the preferred high level option is for incremental growth of all outlying settlements and, as summarised in Table 2.2 above, where a 10% growth is proposed for each one. 10% is deemed to be the maximum level of growth that can be accommodated "without changing the character of the respective settlement". The higher number of homes is designed to completely support a new two form entry (2FE) primary school, which is set at 1,400 homes. We consider that it would be useful to see the evidence behind this.

5.1.3 Whilst we do not disagree that high level option spatial option 2 is preferred and that the growth of the outlying settlements should be incremental; we feel that applying a 10% maximum level of growth across the board is overly simplistic and does not consider the differing character of settlements and the differing characteristics of site which may enable them to accommodate greater levels of growth without compromising settlement character.

5.1.4 Similarly, we question why the scenarios jump straight to a 2FE primary school without considering a 1FE primary school or other options for school place provision which could support a level of expansion above 10% but much lower than 1,400 homes. A large amount of data and analysis on community infrastructure provision has been provided in the Settlement Profiles and we feel these should be used to determine a better informed, more specific approach to identifying a maximum level of growth for each settlement. There is no reason in theory why this could not result in a level of growth at, say, 12% or 15% whilst still

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representing incremental growth that does not compromise the character of the settlement and providing a suitable level of service provision.

- 5.1.5 Furthermore, as a general point, the opportunity provided by new housing to better support existing community infrastructure and, crucially, to enable the enhancement and provision of new and existing facilities, should be seen as a positive feature, especially when presenting proposals to the local community, who will benefit from this. The existing approach too often presents the situation as one in which the current level of service provision in a settlement is a limiting factor on growth; rather than seeing new housing as a positive opportunity to provide new and enhanced facilities (and better support existing services and businesses) which will be a benefit to the local community.
- 5.1.6 Therefore, we suggest that the incremental growth option should be in the range of 10-15%, depending on the housing needs of each settlement; the ability of sites to accommodate development without compromising character; and the ability for growth to enable new community infrastructure to be provided.
- 5.1.7 We have examined the community infrastructure in more detail in this situation with regard to Lymm, based on the information provided in WBC's Settlement Profiles. For this initial assessment, we are considering only primary schools, high schools and GP surgeries, as the key community infrastructure and potentially the hardest to expand. The ability of the subject site to accommodate growth without compromising character, and that of other key potential sites in the settlement, is explored in Section 7. As described earlier in this document, we recommend that WBC undertake further detailed work to assess specific housing needs in each settlement, according to demographic profile, socio-economic characteristics, projected economic growth, existing housing provision and historic housebuilding rates.

Social Infrastructure Capacity in Lymm

- 5.1.8 Lymm has four primary schools (2 x 1FE and 1x 2FE), one of which, Statham County Primary School, is at only moderate capacity; and another, Cherry Tree Primary School, has good expansion potential. Lymm High School (10FE) has limited capacity and is described as having poor expansion potential. However, it currently accommodates children that do not live in Lymm. Capacity could then be found if the strategic distribution of school places is reconsidered and there may be space capacity, or expansion room, in other existing secondary schools in south and east Warrington. Expansion here could be linked to the preferred South-West urban expansion of Warrington. These changes would have the significant added benefit of pupils going to school closer to their homes, resulting in more sustainable travel patterns.



- 5.1.9 There are two GP surgeries, totalling 14 clinical rooms, both of which are at capacity and are described as being unlikely to accommodate expansion. However, we do not consider that this is a significant factor to limit capacity for growth. The existing surgeries could relocate to new larger premises to expand or a new surgery could be opened if there is additional demand. A GP surgery does not require a large amount of space and suitable accommodation could potentially be found in an existing building or built on a suitable site with funding provided by Section 106 contributions.
- 5.1.10 In summary, therefore, we consider that Lymm is the most sustainable of the outlying settlements and its services, with appropriate expansion and re-organisation where required, could potentially accommodate incremental growth above 10%, this should therefore not act as a limit on growth here if additional housing is required.

Potential housing supply in Lymm

- 5.1.11 We have applied WBC's approach to estimating capacity by considering sites that have been put forward in the recent Call for Sites exercise, excluding 'fringe' sites as defined in the plan within the Settlement Profile. We have then included only those sites which have been assessed as having 'moderate' or 'weak' contribution to the Green Belt. For comparative assessment of capacity, we have used WBC's approach in applying a 75% net developable area (unless the Call for Site response includes a net developable area) and then a density of 30 dwellings per hectare to estimate capacity (as described in para 3.4 of the Preferred Development Option).

Table 5.1 – Potential housing supply for Lymm

Reference	Site area (net developable area if known) / ha	Submitted Capacity	Realistic Capacity (using net area or 75%, @ 30 dph)	Green Belt contribution
R18/036 Land off Massey Brook Lane	1.5 (net)	n/a	45	Moderate
R18/082 Land at Reddish Lane	7.23	165	165	Moderate/Strong (but see para 6.1.3-6.1.10)
R18/016 Holly House	0.88 (net)	63	26	Moderate
R18/014 Land at Rushgreen Road	2.68 (gross)	70	60	Moderate
R18/018 Land at Watercress Farm	0.49 (net)	15	15	Moderate
R18/117	4.38 (net)	52	52	Moderate
R18/118 Land adj to Mardale Crescent	3.53 (gross)	100	79	Moderate
R18/132 Land at Rushdale Rd	23 (gross)	500	500	Moderate
R18/094 Land at Birch Brook Rd	2.7 (net)	110	81	Moderate
R18/107 Land at Mill Lane/Stage Lane	21 (gross)	600	470	Moderate
R18/065 Land adj to Lymm Rugby Club	8 (gross)	240	180	Moderate
Total			1,674	

5.1.12 It should be noted that although part of the subject site (parcel R18/097) is categorised as having a 'strong' contribution to the Green Belt this is in conflict with a previous Planning Inspector's opinion and we have challenged this at Section 6.1.



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5.1.13 This analysis establishes that many more dwellings could potentially be accommodated in Lymm if incremental growth of greater than 10% (500 homes) is required in order to meet specific housing needs or provide greater flexibility to help ensure delivery rates can be met Borough-wide. It also establishes the need to undertake a comparative analysis of the above sites in the next stage of Local Plan preparation, in order to select the most sustainable, appropriate and deliverable sites for allocation.



6.0 Critique of Evidence Base Documents

6.1 Green Belt Assessment and Update

6.1.1 The Green Belt Assessment is undertaken at two levels, for both 'general areas' and specific land parcels. In terms of the general area assessment, the subject site in Lymm falls within Area 6, which has been assessed as being of 'moderate' value. We do not have comments on this level of assessment.

6.1.2 We do, however, have the following comments to make on the parcel assessments.

Lymm

6.1.3 The October 2016 parcel assessment study identified the site as parcels LY8 and LY9 which were considered to have an overall contribution of strong (LY8) and moderate (LY9). In addition to this, the July 2017 assessment considered individual parcel assessments submitted to the call for sites consultation. Here, Reddish Lane is referenced as R18/082 and both parcels LY8 and LY9 are now considered to have a strong contribution to the Green Belt.

6.1.4 This is primarily due to the assessment considering that the contribution of both parcels LY8 and LY9 to the third purpose of allocating Green Belt land (as restated in the NPPF): safeguarding the countryside from encroachment, as having a 'strong contribution.' The assessment states that the boundaries of LY8 and LY9 (R18/082) to the existing built-up area are 'non-durable' garden boundaries and thus that the Green Belt plays an important role in protecting the adjacent land from encroachment. It also states that the boundaries of these parcels to the open countryside are strong, with the northern area being bound by the Transpennine Trail. We do not necessarily disagree with these conclusions but consider that the proximity to the Transpennine Trail has been given limited weight in the assessment. Although not in use, the railway line does perform an urbanising feature in the landscape given that the line was engineered to accommodate the former Manchester to Warrington line.

6.1.5 Overall, we consider that the concluding analysis has been incorrectly applied to the concluding analysis, which assess both parcels as making a 'strong' contribution to this purpose.

6.1.6 A significant amount of work has already been done by GL Hearn in Story's Stage 1 representation regarding our assessment of the Green Belt contribution for this land. This is not repeated here but it remains relevant and we advise the Council to refer to this again. We have also provided a comparison assessment table within the supplementary vision document

for the site. The additional analysis below is provided as supplemental to this.

- 6.1.7 Instead of assessing the value of the parcel land on the current situation the assessment should properly consider the impacts of releasing and developing the parcels, because the purpose of the study is after all to inform the release of land for housing. If parcels LY8 and LY9 (R18/082) are developed then the only boundary to the countryside from this part of the settlement edge will be their northern boundaries, which we consider to be strong. The impact of development will therefore be to create a stronger, more defensible settlement edge, which will therefore better safeguard the adjoining countryside from encroachment. We therefore consider the assessment for both these sites should be 'moderate' contribution and not strong. This view was supported by the Council's position for this site in preparing the 1994 Local Plan which was endorsed by the Inspector's conclusions on the site at Reddish Lane (see 6.1.11 below).
- 6.1.8 Although parcels LY8 and LY9 (R18/082) lie alongside the edge of the Conservation Area, we believe that any impacts on its setting can be mitigated with good design and an appropriate site landscape strategy.
- 6.1.9 In total, the Green Belt land around Lymm forms 29 parcels that have been assessed. Seven of these have been assessed as making a 'strong' contribution, 19 as being 'moderate' and three as being 'weak'. However, the three 'weak' land parcels represent a small area of land and only a small part of one of these parcels has been promoted within the Call for Sites exercise summarised in the 2015 SHLAA (SHLAA reference R18/036). This amounts to just 45 houses. It can therefore be reasonably concluded that for Lymm to meet its housing needs some of the 'moderate' parcels will need to be released from the Green Belt.

Inspector's Report on 1994 Local Plan (dated 23 September 1998)

- 6.1.10 Useful conclusions can be drawn from an historic look at policy formulation relating to the land at Reddish Lane in Lymm. When preparing the 1994 Local Plan, the Council originally proposed that this land should not be designated as Green Belt and this decision was firmly supported by the Inspector. Although the Council since gave way to objectors and designated the land as Green Belt, the Inspector's reasoning remains relevant and compelling. In his report the Inspector refers to the land east of Reddish Lane (corresponding with parcel LY9 in Green Belt Assessment and then referred to as Area of Search 14).

He concludes (in paragraph 3.AS14.3 onward) that this land:

"does not, in my opinion, have the appearance of open countryside. From several vantage points it is seen against the backdrop of residential properties to the west and south...And, significantly, along the northern boundary the embankment represents an appreciable visual and physical barrier. These features, in combination, create a noticeable measure of containment around the allocation land. As such there is a distinct contrast, in terms of character and appearance, between this Area of Search and the extensive stretch of open countryside beyond the former railway.

...If development were eventually to be permitted here it would be well contained by the northern boundary feature and would not represent encroachment into open countryside.

...the Council's decision not to designate the Reddish Lane land as part of the proposed Green Belt is entirely justified."

- 6.1.11 Although more than twenty years have since passed since this was written, there has been very little recent development in this area and the position here today is very much as the Inspector described it. In addition, landscape planting has strengthened the northern boundaries over the timescale, further enhancing the enclosed nature of parcels LY8 and LY9. We therefore wish to reiterate that the overall assessment of LY8 as 'strong contribution' should be amended to 'moderate contribution' in light of the 1994 Inspector's Report.

6.2 Urban Capacity Statement

- 6.2.1 Our first point regarding the Urban Capacity Statement (2016) is that the basis of estimating the capacity of the sites covered by the Council's Masterplan (figure 4 within the Preferred Development Option consultation document, pg.35) has not been explained and is poorly presented. The Statement presents only the area-wide Masterplan and a summary table of sites, allowing no cross-referencing between the two. It would be useful to see the site boundaries on the masterplan and to know the size in hectares of each site so that an understanding of density can be gained. The masterplan notation does appear to suggest varying densities but it would be good to understand the density range assumed for each and what this would mean in terms of the type of housing proposed.

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6.2.2 We also have the following comments on the masterplan:

- The masterplan appears to propose housing on virtually all employment land and areas of other significant uses (Riverside Retail Park for example). Whilst we understand that this is a capacity exercise only it is unrealistic to consider a situation in which such a significant area of employment land is lost, especially given WBC's 'New City' aspirations. Many existing business will not wish to cease or relocate and those that do may often experience difficulty in finding appropriate alternative sites.
- The masterplan does not appear to have had any consideration of potential major constraints, showing for example new housing within areas flood zone 2 and even flood zone 3. This makes it highly unrealistic and casts major doubts on its credibility for estimating capacity.
- The masterplan includes all potential SHLAA sites within its extent but then subtracts the number of units from the SHLAA. However, it does not present any schemes proposed for these sites nor show the boundaries of the SHLAA sites, instead it washes over them with the masterplan proposals. In reality the need for these sites to come forward separately will result in reduced design efficiencies and consequently reduced capacities. The masterplan should have shown and worked with the boundaries of SHLAA sites.
- More generally, the masterplan assumes all the land coming forward as a comprehensive scheme. In reality, not all of the sites will come forward and fragmented land ownerships will create awkwardly shaped sites that will result in less efficient layouts. Different interfaces will also have to be considered for employment uses that are retained. This will lead to significantly reduced capacities.
- Finally, the masterplan assumes that all of the land shown will come forward. This depends on the housing market being able to deliver viable schemes on all sites. This is not likely to be the case, especially as, by their nature, most of these are former employment sites and likely to require ground remediation, and many are in lower value housing areas.

6.2.3 For these reasons, we believe that the Urban Capacity exercise is significantly flawed and, at 15,429 units, significantly over-estimates the number of dwellings that the urban area may be expected to accommodate. It is therefore likely that a larger amount of Green Belt land will need to be released in order to meet the housing need.



7.0 Reddish Lane, Lymm - Site Assessment

7.1 Land ownership and commitment to delivery

7.1.1 The site is in single ownership and Story Homes have an agreement to promote the site through the Council's emerging local plan. The site is therefore under the control of a single housebuilder with a willing landowner. There are no ownership or legal constraints to its delivery for housing.

7.1.2 Story Homes are committed to bringing this site forward for housing and will progress a scheme as soon as the site is allocated. This will involve pre-application discussions with Warrington Council and public engagement.

7.2 Environmental Context

7.2.1 The site sits on the northern side of Lymm. It is surrounded by development to the east, south and west and its development would represent an infill with the built-up area, leaving the former railway line as a consistent and defensible northern boundary to the town. To the south, the site relates well to the built-up area, lying only approximately 5 minutes' walk from the village centre.

7.2.2 Impacts of the release of this site on the surrounding Green Belt have been examined in chapter 6 of this document. The strong defensible northern boundary, and the position of the site as infill within this boundary, means that these impacts will be limited. Equally, impacts on the surrounding landscape character are similarly contained.

7.2.3 The other sites assessed from the Call for Sites exercise in Lymm are not all as well related to the built-up area as the subject site:

- R18/018, 068 118, 117, 119: these sites are within an area that is similarly well related to the built-up area to the subject site but which is significantly larger and will have a correspondingly greater impact. It should also be noted that if this area is entirely developed the separate integrity of Rushgreen to Lymm would be lost.
- 120, 132, 145: these sites are within an area that is similarly well related to the built-up area to the subject site but which is significantly larger and will have a correspondingly greater impact.

- 094, 107, 111, 076, 065, 036, 101: development of any of these sites would expand the outer boundary of the built-up area into the surrounding countryside, thereby having a greater impact on the openness of the Green Belt and surrounding landscape character.
- Remaining sites: these are all completely divorced from the existing settlement area and their development would have the greatest impact on the Green Belt and landscape character.

7.2.4 WYG's Landscape team have undertaken landscape and topography analysis to understanding the character of the surrounding landscape and the potential visibility of development. This analysis has informed the emerging masterplan proposals. This work will continue and a full Landscape and Visual Impact Assessment will be undertaken to inform and support any future planning application for the site.

7.3 Landscape Analysis

7.3.1 The site is located on the northern edge of the village of Lymm within the borough of Warrington. It is currently used as arable farmland.

7.3.2 The Bridgewater Canal passes east-west through the centre of the village, 100m to the south of the site. Just over 1km to the north of the site the Manchester Ship Canal passes north-east to south-west. Lymm golf club is located 200m to the north west of the site with the course extending north to the extent of the Ship Canal. The wider landscape of the surrounding 3km landscape study area is made up of a mixture of small to medium sized irregular arable fields interspersed with villages and small scale settlements. The M6 motorway is located 1.8km to the west of the site and the M56 motorway is 2.5km to the south of the site.

7.3.3 New Road / A6144 runs along part of the southern boundary of the site. There are a number of dwellings on the northern side of New Road that cut into the south-eastern boundary of the site. Beyond the road to the south is the residential area of Lymm which includes the New Road Area conservation area. Along the western boundary of the site the residential area backs onto the site. The eastern boundary of the site adjoins a farm with attached arable fields. There is a small cluster of dwellings beyond the sites northern boundary located on Reddish Lane which crosses the site broadly at its middle in a north east to south west alignment.

7.3.4 There is a well-connected network of public rights of way in close proximity to the site. This includes a public bridleway that starts on Reddish Lane and passes broadly west to east along the northern boundary of the site linking to Reddish Crescent and the Trans Pennine Trail in

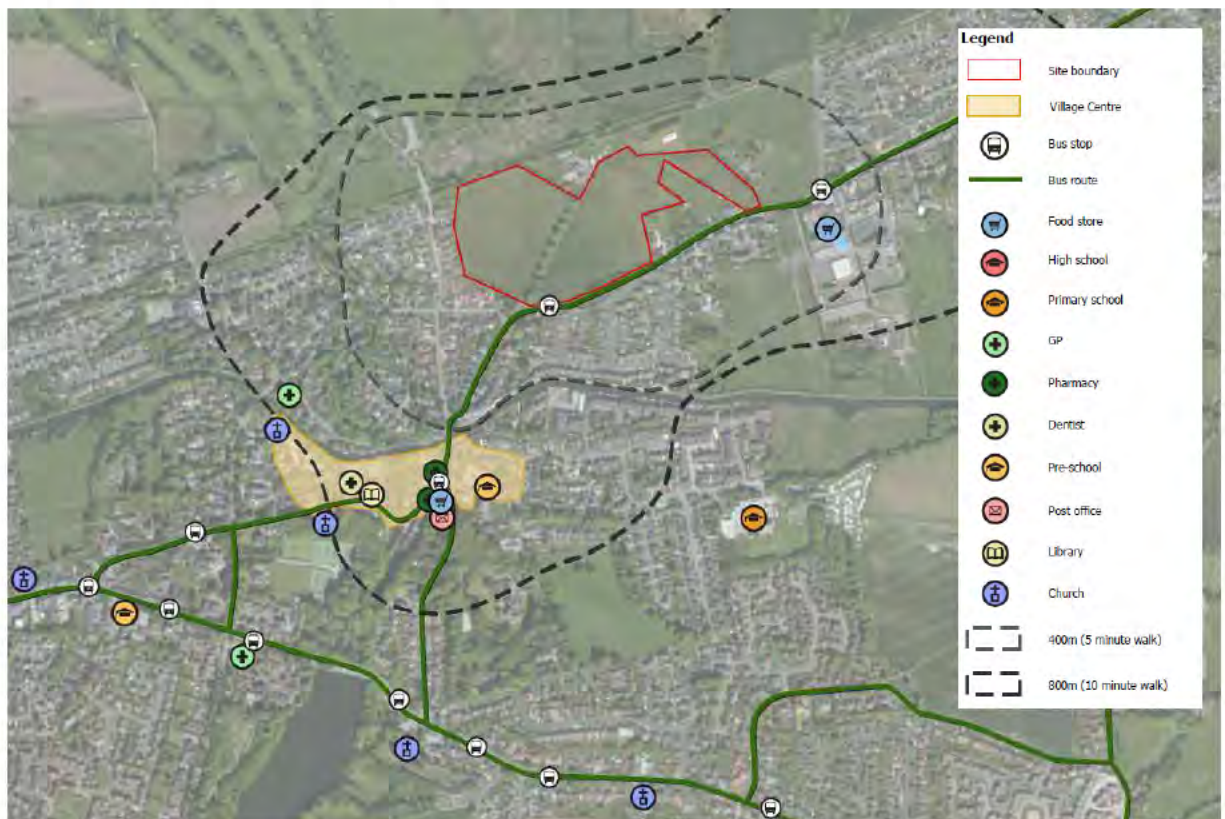
the east. National Cycle Route (NCR) 62: The Trans Pennine Trail is aligned along a former train line passing east to west just beyond the site to the north with a section of it running along the north-western boundary of the site. Beyond the route to the north there are playing fields, allotments, Lymm golf club and a more rural landscape beyond this. 40m to the west of the site a public footpath follows the north south alignment along Lymmhay Lane and there is a spur of public footpath that links through a residential area to Dane Bank Road East. Further south there are a number of public footpaths and bridleways within the residential area of Lymm which includes the public footpath along the Bridgewater Canal which passes east west through the village and is part of the Cheshire Ring Canal Long Distance Walk. The Mersey Valley Timberland Trail Long Distance Walk passes east to west through the south of the village before its alignment turns south and heads towards Lymm dam.

- 7.3.5 Within the village of Lymm to the south of the site there are 3 conservation areas which adjoin each other. The New Road Area conservation area is located beyond the southern boundary of the site. Adjoining this to the south is the large Lymm Village Centre conservation area and The Eagle Brow Area conservation area. Thelwall Village conservation area is located 2.4km to the west of the site. There are no listed buildings on or directly adjacent to the site. The nearest listed building is Tanyard Farmhouse (mid 17th century, Grade II listed), which lies to the south-east of the site on Rush Green Road.
- 7.3.6 The site is located in a relatively flat low-lying landscape at 11-20m AOD in height. To the north of the site the topography gently falls to the Manchester Ship Canal at 3-10m AOD below the site over 1km away. To the south of the site there is a ridgeline passing broadly east to west with the land rising up to 76-80m AOD over 3km from the site at High Leigh. There are a series of valleys running north to south that cut into the ridgeline including one for Massey Brook south west of the site and another for Bradley Brook that cuts into the ridge leading to Lymm dam located on the south of the village.
- 7.3.7 In conclusion, the Site is not recognised as having a special landscape quality and is not the subject of any landscape designations. Residential development at the Site could be brought forward in a manner which was sympathetic to its local landscape and townscape context, with any landscape and visual effects minimised and further offset by a strong landscape strategy to ensure that the development was considerate of its setting.
- 7.3.8 The former railway line /Trans Pennine Trail could form a strong new Green Belt boundary to the north of the site and the open countryside beyond the former railway line to the north.

7.4 Sustainability

- 7.4.1 We have undertaken analysis of the location of key community facilities in Lymm and their accessibility from the subject site (see Figure 2 below).
- 7.4.2 This analysis shows that most of the key local facilities are located within 10 minutes' walk of the site. This includes two GP surgeries, and a food store within 5 minutes' walk of the site. Other local facilities, including a high school and a choice of primary schools, are available in the village. This makes the site sustainable; there will be not be a reliance on the private car and most journeys can be done on foot.
- 7.4.3 Reddish Lane has regular bus services, with two stops available within 5 minutes' walk of the site, located to the site's southern boundary. Service no.5 offers half hourly buses to Altrincham and Warrington.

Figure 2. Local Facilities in Lymm



- 7.4.4 The site compares favourably with other sites put forward in the Call for Sites exercise in terms of accessibility to shops and services however it is the closest of all of the sites to the village centre. Most of the other sites put forward are at the furthest edges of the settlement

and located much further away from local facilities this will ultimately increase private car dependence and negatively impact upon the local road network

7.5 Technical Deliverability

7.5.1 The site is not subject to or near to any restrictive environmental designations. There are no constraints which present an obstacle to development.

Ecology and Trees

7.5.2 The site is not recognised for its biodiversity value. It is not subject to any ecological designations, such as SSSI's, SBI's or Local Nature Reserves, and there are no such designations nearby.

7.5.3 At planning application stage, detailed surveys of the flora and fauna will be undertaken to ensure that there will be no harm to any high value species. There are opportunities to improve biodiversity at the Site through the provision of enhanced habitats, including new green space.

7.5.4 Given that the site is currently used for agriculture, it contains very few trees. All existing high value trees and hedgerows will be retained wherever possible alongside significant new tree planting, to enhance the character of the new development. Overall there will be an increase in the number of trees at the Site.

Flooding and Drainage

7.5.5 The entirety of the site is located within flood zone 1 of the Environment Agency's Indicative Flood Map which means that it is considered to have a low risk of flooding. Initial investigations have indicated that Site drainage can be achieved via an appropriately designed Sustainable Urban Drainage System (SuDS).

Highways

7.5.6 A detailed appraisal of the highway network and access constraints and opportunities has been undertaken by Croft Transport Solutions. Vehicular access to the site can be achieved along the Rush Green Road frontage. The site has the potential to accommodate around 165 residential dwellings. As such, it is likely that only one formal vehicular access point would be required.

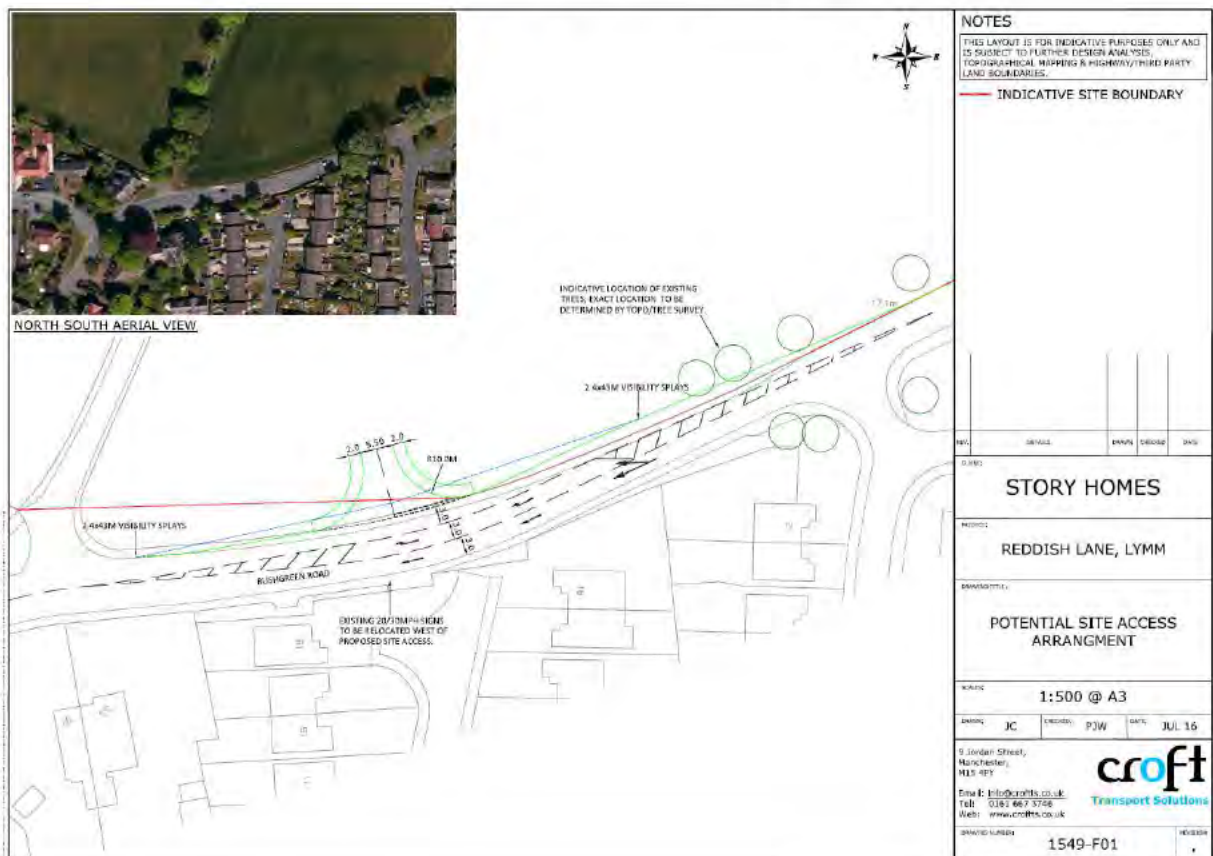
7.5.7 The main vehicular access located on Rush Green Road can accommodate a formal priority junction arrangement with standard geometric parameters for residential developments with a

Representation for Story Homes

5.5 metre wide carriageway, footway on both sides of 2 metres wide and 10 metre radii. Visibility can be achieved in both directions of at least 2.4 metres by 43 metres which ensures it complies with the guidance in Manual for Streets and Manual for Streets 2. The junction can also incorporate a formal right turning lane for traffic turning into the Site from Rush Green Road. All of this geometry can be accommodated within either the Site boundary or within the current limits of adopted highway.

- 7.5.8 This junction has been shown on Drawing Number 1549-F01 (figure 3) and demonstrates that the proposed vehicular access can be adequately accommodated.

Figure 3: Proposed site access (Drawing Number 1549-F01)



- 7.5.9 In terms of off-site impact the proposals are likely to generate in the region of 100 to 120 vehicular trips in the two busiest hours of the day which are likely to be between 0800 and 0900 hours and 1700 to 1800 hours. There are numerous routes for traffic to be dispersed onto the local highway network.

- 7.5.10 Vehicles travelling towards Sale and Altrincham will do so to/from the east and utilise either Rush Green Road and/or Sandy Lane/Mill Lane to the east of the Site. Those vehicles



Representation for Story Homes

travelling towards Warrington or the M6/M56 are likely to travel through the village centre and will be travelling to/from the Site to the west.

- 7.5.11 There are no particular capacity constraints to the local highway network which would provide an issue for this additional traffic generation although this would be demonstrated in detail within a Transport Assessment that would accompany any formal planning application on this Site.

7.6 Potential form of development

- 7.6.1 The site can accommodate up to 165 high quality family homes comprising a range of 2, 3, 4 and 5 bed homes. The proposed scheme will retain a consistent reference to the character of Lymm and will embody the key principles of sustainability, promoting healthy lifestyles and a high quality of life through the retention and enhancement of public rights of way and access to safe and multi-functional green spaces. The properties will be generously spaced and softened by a network of green infrastructure where open spaces will function individually, but will together add up to a comprehensive green environment which permeates throughout the development.
- 7.6.2 The main access to the site will be off Rushgreen Road with the development frontage set back providing a generous arrival green and attractive gateway into the scheme. The public open space in this location will respect and compliment the conservation area to the south and will enhance the retained trees and landscaping along Reddish Lane adding to the visitor experience.



7.7 Community and economic benefits

- 7.7.1 As part of this development Story Homes will be providing the policy requirement of 30% affordable housing. The exact number of units will be determined through a detailed planning application and led by initial discussions with Warrington Council to determine the local need for social rented and discounted sale homes. This will have significant social benefits for the local community. In addition to helping WBC meet the housing needs of the borough, the development of the site will provide significant social, environmental and economic benefits to the local community. The presumption in favour of sustainable development within the NPPF includes social, environmental and economic sustainability.
- 7.7.2 In addition to a network of green infrastructure throughout the site, Story Homes are also proposing to provide approximately 1.5 acres of parkland in the eastern area of the site, accessed from Rushgreen Road and from within the housing scheme. This will be an attractive multi-purpose recreational space that will benefit new and existing residents in the local vicinity in addition to maintaining and enhancing the ecological value and biodiversity of species. The landscaping in this location will also soften the approach into Lymm from Rushgreen whilst proving a complimentary gateway to the public footpath networks in the area.
- 7.7.3 The provision of new housing (and especially the affordable housing element) is a clear social benefit. The Warrington Local Plan Core Strategy identifies Lymm as a neighbourhood centre (a 'larger village centre') in its Vision (p.72) and in Policy SN4. Objective 72 is to "maintain and enhance centres identified in the retail hierarchy throughout the borough as accessible, key locations for shops, services and community facilities".
- 7.7.4 The allocation of the subject site for housing will play an important role in contributing to this objective and realising the vision. It will provide an increase to the local catchment population, which will help to support the shops and public services that exist in the village, with potential additional improvements funded through planning contributions. Furthermore, there will be additional economic benefits in terms of construction jobs and training, and additional tax revenues.
- 7.7.5 The Home Builders Federation have produced a useful tool to estimate the value of these wider economic benefits (<http://www.hbf.co.uk/index.php?id=3197>).



Representation for Story Homes

7.7.6 For 165 new homes this is estimated to:

- Support the employment of 709 people
- Provide 6 apprentices, graduates or trainees
- Generate £1,650,000 in tax revenue, including £212,190 in Council Tax revenue.

7.7.7 Story Homes have provided further information about the values of the company within their vision brochure demonstrating their investment into apprentices and graduates as a key area of their business.

7.8 Summary and Comparison

7.8.1 In summary it has been demonstrated that land at Reddish Lane, Lymm is the most suitable and sustainable site to receive a proportion of Lymm's housing needs when compared with other potential growth sites in the village. We have highlighted that the proposed scheme will have only a limited impact on the Green Belt and on the character of the surrounding landscape which will ultimately be respected and the recreational enjoyment of it, promoted. The site has been shown to be a sustainable site: it is well located in terms of its accessibility to key local facilities and its development will provide significant social and economic benefits to the existing community.

7.8.2 Finally, technical work undertaken has demonstrated that the proposed residential development is deliverable and that there are no constraints which present an obstacle to development. For these reasons, we believe there is a strong case for the allocation of this land for residential development to meet identified housing needs in Lymm.

7.8.3 Story Homes encourage the Council to consider the supplementary vision brochure as part of our submission.



Appendix 1:
Site Location Plan

Potential Site: 



DEVELOPMENT - Reddish
Lane, Lymm

© **Story Homes.**

Kensington House, Ackhurst Business Park, Foxhede Road, Chorley, Lanc
Tel 01257 443250 Fax 01257 443251

Not to Scale:





REDDISH LANE, LYMM

VISION DOCUMENT, SEPTEMBER 2017







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01 INTRODUCTION



This Vision Document has been prepared by Story Homes North West to set out the vision for a new sustainable extension to Lymm, in Warrington. It sets out the case for releasing land at Reddish Lane ('the Site') from the Green Belt and allocating it for housing, as part of Warrington Borough Council's Local Plan Review. It demonstrates that this can provide a sustainable solution to help Warrington Borough Council meet its future housing growth requirements.

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

This document has taken account of key technical considerations including accessibility, landscape and visual impact to inform the preparation of a Concept Masterplan that demonstrates the suitability of the Site for residential development.

At the outset, it is highlighted that the site:

- Is in a highly sustainable location in close proximity to the existing services and facilities within the village centre
- Will result in a relatively minimal harm to the key purposes of the Green Belt; and
- Provides an opportunity to create a high quality development which is sympathetic and responsive to the existing settlement character of Lymm

This document is submitted to the Council alongside the representations to the Warrington Local Plan Preferred Option consultation (September 2017) produced by WYG, and builds on the earlier scoping stage consultation and the Heritage Appraisal produced by Wardell Armstrong. Both of these representations should be read in conjunction with this Vision Document.



INTRODUCTION TO STORY HOMES



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 of England and South of Scotland. 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.

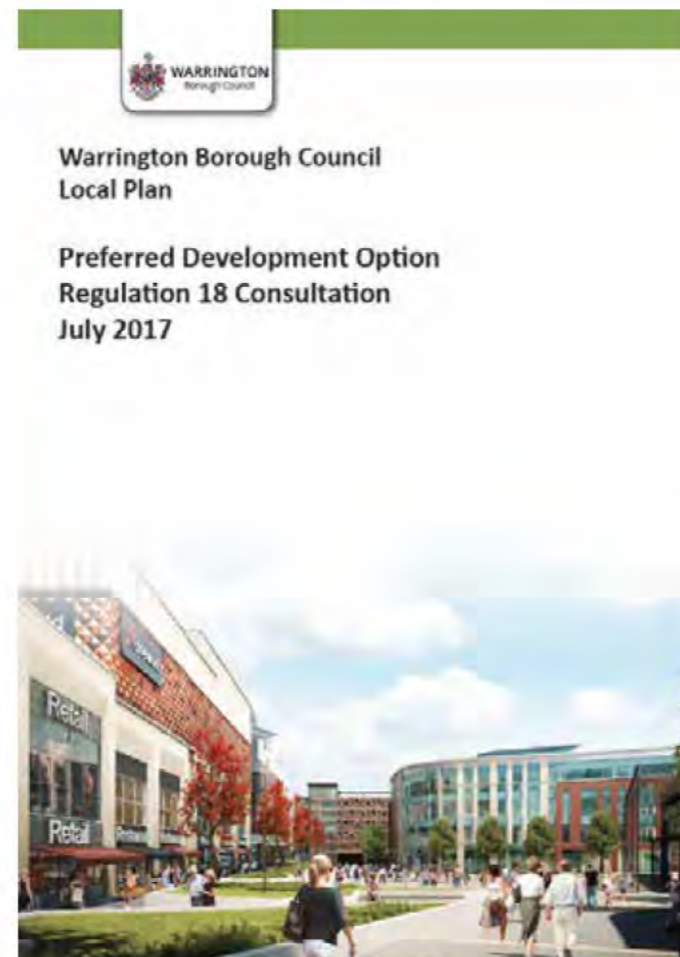
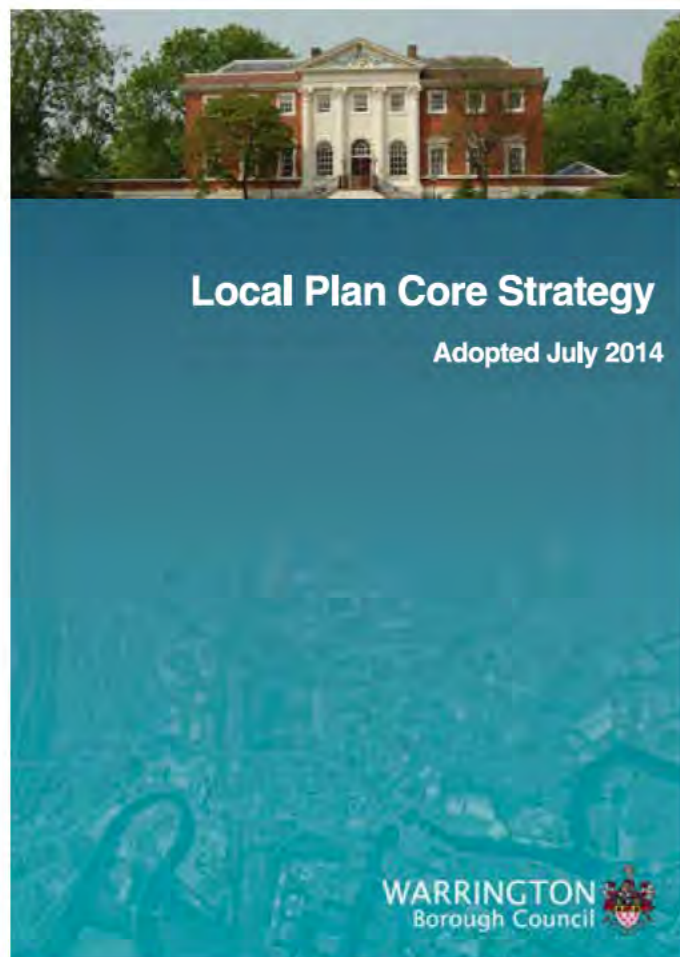
For nearly 30 years Story Homes has been the name most often associated with aspirational homes for sale throughout Cumbria, the North East and Lancashire. A passion for quality and excellence has seen Story Homes become a multi-award winning UK property developer; with modern and attractive homes instantly inspiring buyers. Story Homes have been awarded the top '5 star' rating in the house building industry's annual customer satisfaction survey for the 4th year running since becoming eligible 4 years ago.

Story Homes' success is underpinned by a determination to understand the needs of communities where we build and a goal to deliver design quality and high quality building specifications that enhance locations. Story Homes' presence in the North West is growing significantly and has recently been awarded 3 UK Property awards for Brookwood Park in Kirkham, The Woodlands in Shotley Bridge and Pentland Reach in Biggar.

The Story Difference – comprising a commitment to design quality, place-making and customer experience – will be instrumental in delivering an exemplary new development which Lymm can be proud of.

02 THE PLANNING CONTEXT

THE EMERGING WARRINGTON LOCAL PLAN REVIEW



Given the results of the High Court challenge and the emerging evidence underpinning the Borough's growth needs and economic development ambitions, the Council recognised the need to undertake a review of the Local Plan.

Local Plan Scoping stage consultation was undertaken in November 2016. The Council then published their Preferred Development Option for consultation in July 2017. This sets out the current housing and employment land requirement for the Borough and the preferred option strategy for meeting these needs.

To underpin the Local Plan review, the Council commenced the preparation of the Borough's housing and economic needs to the year 2037. The most up to date study assessing the housing objectively assessed need (OAN) for the Borough identified a need of 955 new homes per year to 2037.

The Council has also assessed the number of additional jobs that will be created through the Council's growth aspirations set out in the 'Warrington Means Business' economic development programme as well as the Local Enterprise Partnership's (LEP) Strategic Economic Plan and future growth ambitions. These growth aspirations will deliver 31,000 new jobs in Warrington up to 2040 which is approximately 30% above the baseline forecasts and there is a need to ensure a balance between the number of homes and jobs.

There is also a need to provide an additional 5% buffer to allow for flexibility (as directed by the National Planning Policy Framework) and to make up for an existing backlog of 847 homes. All of this means that it will now be necessary to increase the minimum supply of homes to around **1,200 per annum**. The Council are also seeking to identify 'safeguarded land' to meet further needs for the ten years beyond the Plan period.

The most recent Strategic Housing Land Availability Assessment (SHLAA), published in January 2016 has identified that Warrington's housing needs cannot be met on brownfield land, existing commitments and on greenfield sites outside of the Green Belt.

If Warrington is to meet its development needs, then based on the Preferred Development Option, sufficient Green Belt land will need to be released to deliver approximately 9,000 new homes and 213 hectares of employment land over the next 20 years [from Preferred Development Option, WBC, July 2017].

Warrington Borough Council adopted its Local Plan Core Strategy in July 2014. This set out a need to build 500 new homes every year up to 2027. This requirement is now out of date.

Following the adoption of the Core Strategy, a High Court Challenge subsequently quashed the specific parts of the Plan relating to:

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

The Council have sought to deliver as much housing as possible within the urban area. They commissioned an Urban Capacity Study which estimated that 15,429 homes could be delivered on existing urban sites, a figure which we feel is unrealistically high and is open to challenge. However, the Council nevertheless maintain that they will need to release sufficient Green Belt land to deliver 8,791 homes (see Table 1).

The Preferred Development Option is Option 2. This is for the majority of Green Belt release to be adjacent to the main urban area in Warrington, with incremental growth in the outlying settlements. This includes a Garden City Suburb of approximately 6,000 new homes to the south-east of Warrington and an urban extension in South-West Warrington of around 2,000 homes.

The outlying settlements have been identified as having an indicative capacity for 1,190 new homes on land to be released from the Green Belt, of which 500 will be located in Lymm (see Table 22).

The Green Belt Assessment has assessed all suitable sites immediately adjacent to the existing built-up area of Lymm and there is only enough land identified as making a 'weak' contribution to the Green Belt to deliver around 45 houses. It will therefore be necessary to release land that makes a 'moderate' contribution to the Green Belt in Lymm. This corresponds with the 'incremental growth' option assessed in WBC's Settlement Profile for Lymm, which concludes that this level of growth is likely to be supported by existing and enhanced infrastructure within Lymm.

This represents very clear "exceptional circumstances" to justify the release of land from the Green Belt. The Site at Reddish Lane in Lymm has the potential to make a substantial contribution to the social and economic success of the Borough.

	955 p.a.	1,113 p.a.	1,332 p.a.
Housing Target 2017 to 2037	19,100	22,260	26,640
Flexibility at 5%	955	1,113	1,332
Backlog (from 2015 against OAN)	847	847	847
Total Requirement	20,902	24,220	28,819
Total Capacity within urban area	15,429	15,429	15,429
Green Belt requirement	5,473	8,791	13,390

Table 1: Housing Land Requirements

Settlement	Indicative Green Belt Capacity
Lymm	500
Culcheth	300
Burtonwood	150
Winwick	90
Croft	60
Glazebury	50
Hollins Green	40
TOTAL	1,190

Table 22: Outlying Settlements - Indicative Green Belt Capacity

Tables extracted from Preferred Development Option, WBC, July 2017

03 THE SITE

LOCATION AND OWNERSHIP



The Site is comprised of approximately 7 hectares of undeveloped farmland. It adjoins the north eastern edge of the settlement of Lymm, approximately 300m north of the village centre. The Site comprises two arable fields, separated by Reddish Lane which is accessed from Rushgreen Road.

The Site is in single ownership and Story Homes has an agreement with the landowner. It is therefore under the control of a single housebuilder. There are no ownership or other legal constraints to its development.

The Site is enclosed by:

- The residential areas of Lymm to the west and south
- A6144 Rushgreen Road to the south
- Trans Pennine Trail (the former London and North Western Railway line opened in 1853) to the north
- A further field to the east currently being promoted for residential development

The Site is in a highly sustainable location in very close proximity to existing services and facilities, and will result in relatively minimal harm to the Green Belt.

The Site is broadly flat, with various trees and hedgerows characterising the boundaries of the site adding to the degree of self containment within the landscape. The Site is locally very well contained by the former railway line and associated vegetation to the north, and residential development to the east, west and south. A further open field lies beyond the site boundary to the east between the site and housing on Reddish Crescent which in turn runs into Reddish Lane where it crosses the former railway line to access New Farm and Reddish Hall beyond the line to the north.

04 GREEN BELT ASSESSMENT

Warrington Borough Council have undertaken two Green Belt Assessments, one in October 2016 and an additional assessment in July 2017, which assessed sites submitted to the Council.

In the October 2016 Assessment, the Reddish Lane site in Lymm was identified as parcels LY8 and LY9, which were considered to have a strong (LY8) and 'moderate' (LY9) contribution respectively.

The July 2017 Assessment references the site as R18/082 (SHLAA reference), which now considers parcels LY8 and LY9 as making a 'strong' contribution. Story Homes have provided a comparative assessment overleaf against this July 2017 Assessment.

A significant amount of work has already been done by GL Hearn in Story's Stage 1 representation regarding our assessment of the Green Belt contribution for this land.

Instead of assessing the value of the parcel land in its current situation the assessment should properly consider the impacts of releasing and developing the parcels. If parcels LY8 and LY9 (R18/082) are developed then the only boundary to the countryside from this part of the settlement edge will be their northern boundaries, which we consider to be strong. The impact of development will therefore be to create a stronger, more defensible settlement edge, which will therefore better safeguard the adjoining countryside from encroachment. We therefore consider the assessment for both these sites should be 'moderate' contribution and not 'strong'.

1994 Local Plan

This view is supported by the Council's position on this land in preparing the 1994 Local Plan, when the Council originally intended not to include this site within the Green Belt, and by the Inspector's Report, in which he stated:

"...If development were eventually to be permitted here it would be well contained by the northern boundary feature and would not represent encroachment into open countryside. The Council's decision not to designate the Reddish Lane land as part of the proposed Green Belt is entirely justified."

[Inspector's Report, 1994 Local Plan]

The impacts of this change will mean that LY8 will have two purposes as making 'no contribution', two 'moderate' contributions and one 'strong' contribution. This should therefore make the overall assessment of LY8 as 'moderate' rather than 'strong'.

Although parcels LY8 and LY9 lie alongside the edge of the Conservation Area, we believe that the development can respond positively to the conservation area through good design and an appropriate site landscape strategy.

Parcel LY9 is already considered as making a 'moderate' contribution and following the re-assessment suggested above would remain as 'moderate'.

In total, the Green Belt land around Lymm has been separated into 29 parcels. Seven of these have been assessed as making a 'strong' contribution, 19 as being 'moderate' and three as being 'weak'. However, the three 'weak' land parcels represent a small area of land and only a small part of one of these parcels has been promoted within the Call for Sites exercise summarised in the 2015 SHLAA (SHLAA reference R18/036). This amounts to just 45 houses. It can therefore be reasonably concluded that for Lymm to meet its housing needs some of the 'moderate' parcels will need to be released from the Green Belt.



GREEN BELT ASSESSMENT

Lymm, Reddish Lane – Green Belt Contribution Comparison table

Site	Purpose 1: to check the unrestricted sprawl of large built-up areas	Purpose 2: to prevent neighbouring towns merging into one another	Purpose 3: to assist in safeguarding the countryside from encroachment;	Purpose 4: to preserve the setting and special character of historic towns	Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Justification for Assessment	Overall Assessment
R18/082	No contribution: The site is not adjacent to the Warrington urban area and therefore does not contribute to checking the unrestricted sprawl of large built-up areas.	No contribution: The site does not play a role in preventing towns from merging.	Strong contribution: The site is connected to the settlement along its western and southern boundaries. The western boundary consists of hedge lined garden boundaries which may not be durable enough to prevent encroachment into the site. The southern boundary consists of the A6144 Rush Green Road, which is more durable. The site is connected to the countryside along its northern and eastern boundaries. Part of the northern boundary consists of the Transpennine Trail, which is durable, but the majority of the site's northern and eastern boundary consists of non-durable field boundaries which are not durable however the durable Transpennine Trail is within 100m of the boundary and this would contain any encroachment. The existing land use consists of open countryside. There is no built form and low levels of vegetation, mainly consisting of trees along Reddish Lane within the site. The site is well connected to the open countryside to the north. The site supports a strong degree of openness as it contains no built form, low levels of vegetation and supports long line views of the countryside to the north. Overall the site makes a strong contribution to safeguarding the countryside from encroachment due to its openness and non-durable boundaries to the west and east.	Strong contribution: Lymm is a historic town. The site does not cross an important viewpoint of the Parish Church. The majority of the site is located within the 250m buffer area around Lymm Conservation Area. Part of the site's southern boundary lies adjacent to the Conservation Area. Therefore the site makes a strong contribution to preserving the setting and special character of historic towns.	Moderate contribution: The Mid Mersey Housing Market Area has 2.08% brownfield urban capacity for potential development, therefore the site makes a moderate contribution to this purpose.	The site makes a strong contribution to two purposes, a moderate contribution to one and no contribution to two. In line with the methodology, the site has been judged to make a strong overall contribution. While the site does not contribute to checking unrestricted sprawl or preventing towns from merging, it makes a strong contribution to preserving the character of the Lymm Conservation Area and safeguarding the countryside from encroachment due to its location, openness and non-durable boundaries. The site also makes a moderate contribution to assisting in urban regeneration.	Strong contribution
Story Homes' view	Agree - No contribution	Agree - No contribution	Strongly Disagree - Moderate Contribution Story Homes disagree with the Council's Assessment of purpose 3 whereby the proximity of the site's northern boundary to the Trans Pennine Trail has been given only limited weight in the assessment methodology. The Council acknowledge that the Trans Pennine Trail is a durable boundary that would "contain any encroachment" and therefore the contribution of the parcel to purpose 3 should be downgraded. In addition to this, we also disagree that the site supports a "strong degree of openness" as although it is connected to the open countryside to the north, the views from the site and visual openness beyond its northern boundary are restricted by the elevated position of the Trans Pennine Trail with it being a former railway line. Although not in use, the railway line does perform an urbanising feature in the landscape given that the line was engineered to accommodate the former Manchester to Warrington line. Overall we disagree that the site makes a 'strong contribution to safeguarding the countryside from encroachment' as the site sit's within a durable boundary to the north and is a natural infill to the existing residential development to the western and southern boundaries. There are also residential properties to the east of the site thus providing urbanising features on all boundaries of the site.	Disagree – Moderate contribution Story Homes agree that Lymm is a historic town and acknowledge that the site's southern boundary is adjacent to the Lymm Conservation Area. 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. The assessment concludes, following guidance by Historic England that the evidential, historical and aesthetic values of Lymm conservation area will be unaffected by development within the site. Similarly the setting of the conservation area will be unaffected through the proposed development. Story Homes have previously submitted this evidence to the Council in December 2016.	Agree – Moderate contribution	The site makes a moderate contribution to two purposes of the green belt in addition to three weak contributions. The site represents a logical location for release which will have relatively limited harm to the general extent of the Warrington Green Belt. The surrounding features are easily recognisable and can form new defensible boundaries. Although the site's northern boundary is not regarded as 'durable', it is within very close proximity to the Trans Pennine Trail and therefore when assessed as a wider Green Belt parcel in this location, the Trans Pennine Trail is a significant urbanised boundary that prevents urban sprawl and encroachment into the wider countryside.	Moderate contribution



05 SUSTAINABILITY

Local Facilities

We have undertaken analysis of the location of key community facilities in Lymm and their accessibility from the subject site (see the Facilities Plan).

This analysis shows that most of the key local facilities are located within 10 minutes' walk of the site. This includes two GP surgeries, and a food store within 5 minutes' walk of the site. Other local facilities, including a high school and a choice of primary schools, are available in the village. This makes the site sustainable: there will be not be a reliance on the private car and most journeys can be done on foot.

Reddish Lane has regular bus services, with two stops available within 5 minutes' walk of the Site, at the Site's southern boundary. Service no.5 offers half hourly buses to Altrincham and Warrington.

The Site compares favourably with other sites put forward in the Call for Sites exercise in terms of accessibility to shops and services. It is the closest of the sites to the village centre. Most of the other sites put forward are at the furthest edges of the settlement and located much further away from local facilities.

Education

Several primary schools and a secondary school are all within walking distance of the Site. Oughtrington Primary School is located around 1,100 metres, just over a 14 minute walk, from the Site off Howard Avenue. Access to the school can be achieved directly utilising the existing footways along Rush Green Road and Howard Avenue.

Footways exist along both sides of Rush Green Road, to the east of the site, as does a formal signal controlled pedestrian crossing point across the carriageway close to the junction with Howard Avenue which links the Site to the school.

The nearest secondary school to the Site is Lymm High School around 2 kilometres from the Site.

The Site is in a highly sustainable location. Many local amenities are situated within a short walk of the Site and would provide day-to-day services and facilities for the new residents.

Medical

The nearest medical facilities are located around 800 metres from the Site at the Brookfield Surgery on Brookfield Road located to the west of the Site. Several dental surgeries are located close to the site, the closest being Jill Cooper Dental Surgery on Rush Green Road around 500 metres east of the Site.

Altrincham and Warrington Hospitals are both within a short bus journey of the Site using either the service number 5 or the 38 both of which pass the site on Rush Green Road.

Retail

There are local retail facilities within the vicinity of the Site. The closest is a food retail unit that is occupied by Sainsbury's. In addition, the centre of the village is located within a 5 minute walk of the site.

A range of local amenities are located within the centre of Lymm such as the following:

- Sainsbury's convenience store
- Post Office
- Bakery
- Butchers
- Two pharmacies
- Lloyd's Bank
- Library
- Various restaurant
- Leisure facilities

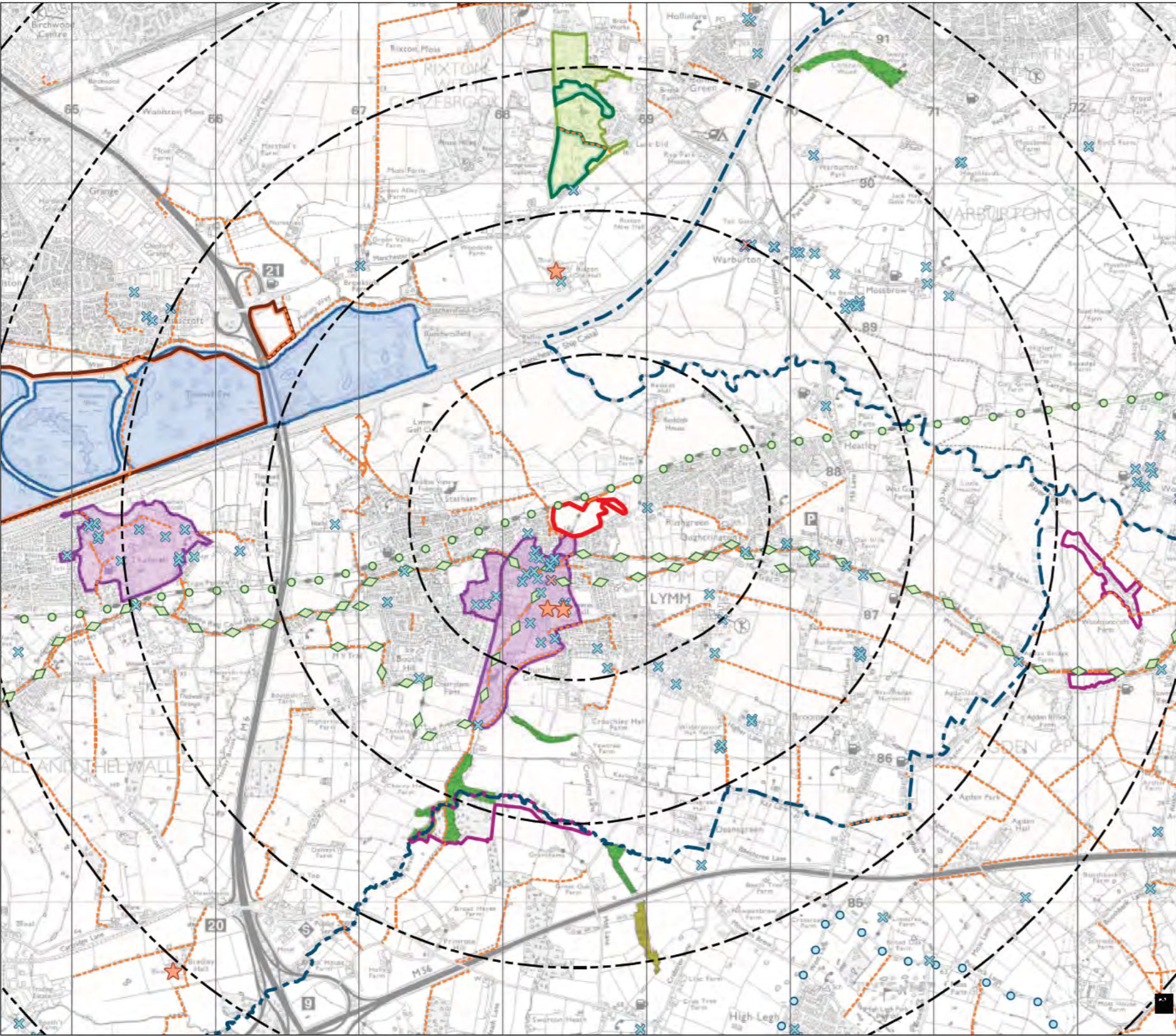

























FACILITIES PLAN



- Site boundary
- Lymm Village Centre
- Bus stop
- Bus route
- Food store
- High school
- Primary school
- GP
- Pharmacy
- Dentist
- Pre-school
- Post office
- Library
- Church
- 400m (5 minute walk)
- 800m (10 minute walk)

LOCAL LANDSCAPE



-  Preliminary Site Boundary
-  1km buffers from site boundary
-  Unitary Authority boundaries
- Landscape Designations :**
-  Ancient and Semi-Natural Woodland
-  Ancient Replanted Woodland
-  Authorised Landfill Sites
- Public Access :**
-  Public Footpaths
-  Public Bridleways
-  Restricted Byways
-  Long Distance Footpaths
-  National Cycle Route
-  - Link to NCR
-  Regional Cycle Route
- Heritage Designations :**
-  Conservation Areas
-  Scheduled Monuments
- Listed Buildings
-  Grade I
-  Grade II*
-  Grade II
- Biodiversity Designations :**
-  Special Areas of Conservation
-  Sites of Special Scientific Interest
-  Local Nature Reserves
-  Local Wildlife Sites
-  Wildlife Trust Reserve

06 CONSTRAINTS AND OPPORTUNITIES



The Site is not subject to or near to any restrictive environmental designations. There are no constraints which present an obstacle to development.

Instead, the Site has substantial opportunities to create an exemplar residential development. Strong place-making and high quality landscape features can be provided, which will ensure that the Site is an attractive and tranquil residential neighbourhood with a distinct and long-lasting environmental character.

Key and unique opportunities include the ability to:

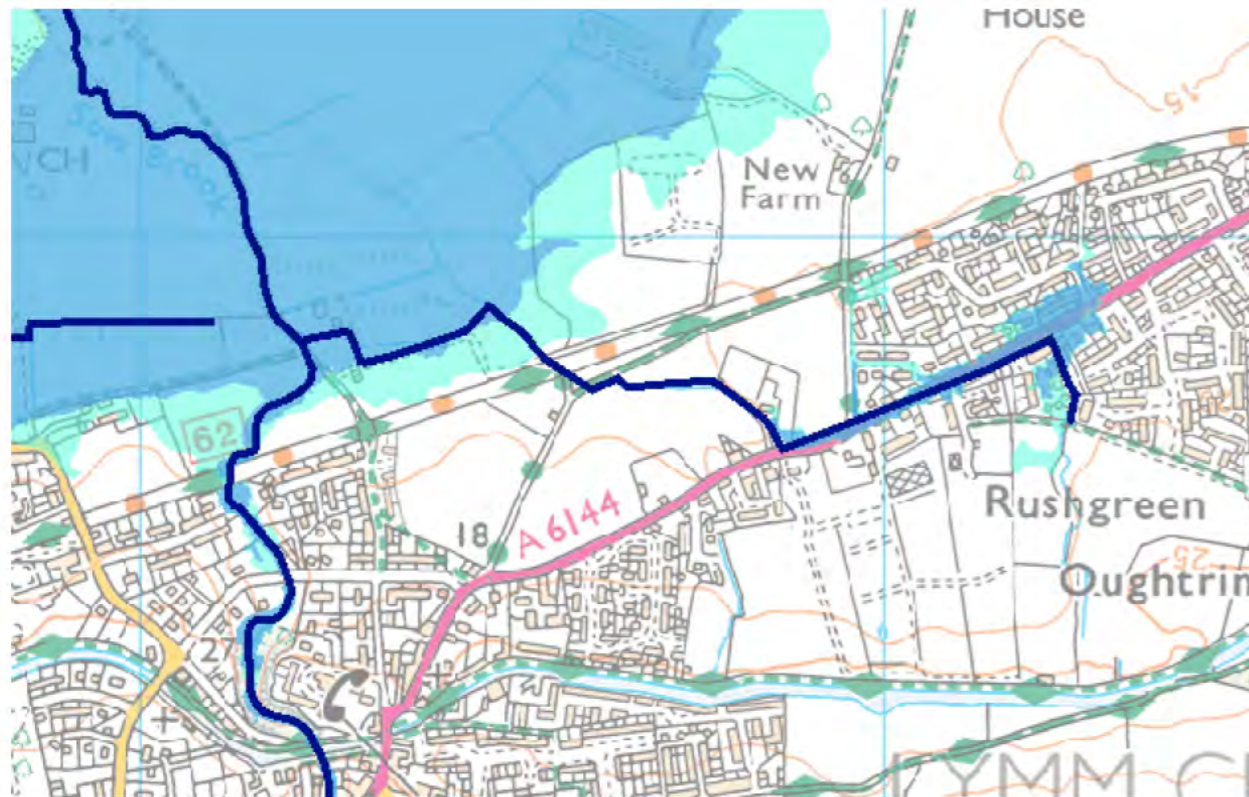
- Enhance existing landscape features, such as Reddish Lane and the trans pennine trail, to provide a truly landscape led approach which creates an unparalleled recreational and biodiversity area for Lymm
- To create a strong settlement edge to the eastern approach to Lymm along Rushgreen Road and appropriate response to the entrance to the adjacent Conservation Area and the existing distinctive village character
- Integrate with the existing community at Lymm and connect to services and facilities which are in very close proximity
- Retain, adapt and refurbish the existing 'Cheshire' railings along the western portion of the southern boundary
- Retain and enhance existing mature landscaping to Reddish Lane and retain Reddish Lane as an access to the Trans Pennine Trail and existing property
- Create connections to existing Public Rights of Way in the vicinity of the site
- Respond positively to the New Road conservation area with the retention of a green landscaped entrance
- Retain and enhance mature landscaping on the site's boundaries
- Provision of extensive open space throughout the development which could be used by existing and future residents
- Development set back from the edge of the conservation area and arranged and designed to provide a positive setting



Key	
Constraints	
1	Existing mature trees and Landscaping to Reddish Lane
2	New Road Conservation area
3	Main Site Access from Rushgreen Road
4	Existing mature trees and Landscaping to Rushgreen Road and site boundaries
5	Views into the site from Rushgreen Road
6	Green 'corridor' to Rushgreen Road
7	Existing Properties accessed from Reddish Lane
8	Existing Allotments
Opportunities	
09	Secondary Access from Yew Tree Close
10	Create Connections to Existing Bridleway 00198/48, foot-path 193/20 and Trans Pennine Trail
11	Trans Pennine Trail
12	Footpath 193/20
13	Bridleway 00198/48
14	Respect views towards New Road Conservation Area
15	Create Green Buffer from future development to Rushgreen
16	Public Combined Sewer
17	Abandoned Public Sewer
18	Public Surface Water
19	Brook

Visual corridor from the conservation area

CONSTRAINTS AND OPPORTUNITIES



EA Flood Map for Lymm

Source: Environment Agency – downloaded 25/09/2017



Ecology and Trees

The Site is not recognised for its biodiversity value. It is not subject to any ecological designations, such as SSSI's, SBI's or Local Nature Reserves, and there are no such designations nearby.

In due course, detailed surveys of the flora and fauna will be undertaken to ensure that there will be no harm to any high value species. There are opportunities to improve biodiversity at the Site through the provision of enhanced habitats, including new green space.

Given that the Site is currently used for agriculture, it contains very few trees. All existing high value trees and hedge-rows will be retained wherever possible alongside significant new tree planting, to enhance the character of the new development. Overall there will be an increase in the number of trees at the Site.

Flooding and Drainage

The entirety of the Site is located within flood zone 1 of the Environment Agency's Indicative Flood Map which means that it is considered to have a low risk of flooding.

Initial investigations have indicated that Site drainage can be achieved via an appropriately designed Sustainable Urban Drainage System (SuDS).

Landscape

The landscape constraints and opportunities at the Site have been assessed by WYG, a multi-disciplinary team of Landscape Architects.

The site falls within the southern portion of National Character Area 60 – Mersey Valley, which consists of a wide, low-lying river valley landscape focusing on the River Mersey, its estuary, associated tributaries and waterways.

Warrington Borough Council produced a Landscape Character assessment in 2007. The Site is identified in this document as lying within Landscape Character Type 5 River Flood Plain and Landscape Character Area 5A River Mersey/Bollin (East). The former railway line embankment however, creates a strong physical and visual barrier between the Site and the wider river flood plain to the north. The Site in terms of current land use, is connected to the farmland to the north (south of the River Bollin floodplain), and generally associated with the large farm complexes to the north such as Reddish Hall to the north west of the Site. The Site itself however, is separate in character to this wider area of farmland. The landscape to the south of the Trans Pennine Trail is part of a more intimate and contained landscape surrounded by built development of various forms including the former railway line and residential development.

The Site is not recognised as having a special landscape quality and is not the subject to any landscape designations. Residential development at the Site could be brought forward in a manner which was sympathetic to its local landscape and townscape context, with any landscape and visual effects minimised and further offset by a strong landscape strategy to ensure that the development was considerate of its setting. The former railway line /Trans Pennine Trail could form a strong new Green Belt boundary to the north of the site and the open countryside beyond the former railway line to the north.

Highways

A detailed appraisal of the highway network and access constraints and opportunities has been undertaken by Croft Transport Solutions.

Vehicular access to the Site can be achieved along the Rush Green Road frontage. The Site has the potential to accommodate around 165 residential dwellings. As such, it is likely that only one formal vehicular access point would be required.

The main vehicular access located on Rush Green Road can accommodate a formal priority junction arrangement with standard geometric parameters for residential developments with a 5.5 metre wide carriageway, footway on both sides of 2 metres wide and 10 metre radii.

Visibility can be achieved in both directions of at least 2.4 metres by 43 metres which ensures it complies with the guidance in Manual for Streets and Manual for Streets 2. The junction can also incorporate a formal right turning lane for traffic turning into the Site from Rush Green Road. All of this geometry can be accommodated within either the Site boundary or within the current limits of adopted highway.

The proposed junction has been located to ensure the greatest distance away from the existing junction of Reddish Lane and Rush Green Road to avoid the row of trees that are located along the eastern portion of the Rush Green Road frontage.

This junction has been shown on Drawing Number 1549-F01 and demonstrates that the proposed vehicular access can be adequately accommodated.

In terms of off-site impact the proposals are likely to generate in the region of 100 to 120 vehicular trips in the two busiest hours of the day which are likely to be between 0800 and 0900 hours and 1700 to 1800 hours. There are numerous routes for traffic to be dispersed onto the local highway network.

Vehicles travelling towards Sale and Altrincham will do so to/from the east and utilise either Rush Green Road and/or Sandy Lane/Mill Lane to the east of the Site. Those vehicles travelling towards Warrington or the M6/M56 are likely to travel through the village centre and will be travelling to/from the Site to the west.



There are no particular capacity constraints to the local highway network which would provide an issue for this additional traffic generation although this would be demonstrated in detail within a Transport Assessment that would accompany any formal planning application on this Site.

Heritage

The Site abuts the northern boundary of the New Road Conservation Area. Wardell Armstrong have undertaken an assessment of the Site to assess what impact, if any, the proposed development would have on designated and non-designated heritage assets within the vicinity of the Site. This assessment concludes that the evidential, historical and aesthetic values of Lymm Conservation Area would be unaffected by development.

The masterplan proposes to create a new green landscaped entrance to the site which would provide a significant amount of open space to respond to the setting of the New Road Conservation Area and maintain the open views from the conservation area to the site. The new site entrance has the ability to enhance the experience of the conservation area through new tree and hedgerow planting, green landscaped design and retention of the Cheshire railings.



Key

- 1 Development blocks
- 2 Development blocks low density
- 3 Public open space
- 4 Indicative tree planting
- 5 Movement network
- 6 Key focal buildings
- 7 Views from the POS
- 8 Retained trees and landscaping along Reddish Lane
- 9 Bridle path 00198/48
- 10 Views into site
- 11 Active frontages
- 11 Footpath 193/20
- 12 Conservation area
- 13 Arrival space
- 14 Views to key focal buildings
- 15 Trans Pennine Trail
- 16 Access details as per crofts drawing number 1549-F01
- 17 Buffer to Rushgreen Road to incorporate existing mature landscaping
- 18 Potential secondary access
- BS Existing bus stops on Rushgreen Road

Areas

Gross Area - 7.23Ha
 Public open space - approx 1.70Ha (Including Reddish Lane & Buffer to Rushgreen Road)
 Nett Area Circa - 5.53Ha

Density

5.53Ha x 30 Dwellings per Hectare
 = 166 Dwellings

07 THE MASTERPLAN

INTRODUCTION



The site can accommodate up to 165 high quality family homes comprising a range of 2, 3, 4 and 5 bed homes.

The proposed scheme will retain a consistent reference to the character of Lymm and will embody the key principles of sustainability, promoting healthy lifestyles and a high quality of life through the retention and enhancement of public rights of way and access to safe and multi-functional green spaces.

The properties will be generously spaced and softened by a network of green infrastructure where open spaces will function individually, but will together add up to a comprehensive green environment which permeates throughout the development.

The main access to the site will be off Rushgreen Road with the development frontage set back providing a generous arrival green and attractive gateway into the scheme. The public open space in this location will respect and compliment the conservation area to the south and will enhance the retained trees and landscaping along Reddish Lane adding to the visitor experience.



Reddish Lane Lymm

Draft Masterplan

September 2017 | 1:500 @ A0 Drawing No: SH005 SK01 Revision: P2



VISION PRINCIPLES



The Site will provide for a new sustainable community that:

- Will successfully integrate within the area through retention and celebration of existing landscape features including existing trees and important hedgerows which exist both internally and to the perimeter of the Site.
- Will successfully integrate important PROW and existing pedestrian connections through the Site, allowing linkage with surrounding development to the west, south and east.
- Will ensure proposed development is configured at key access points with an outward aspect, helping to celebrate entrance to the development. The southern boundary will be enhanced with a green landscaped Site access which will provide an attractive entrance to the development.
- Development set back from the edge of the conservation area and arranged and designed to provide a positive setting.
- Will provide for a 'landscape dominant' character typified by retention of landscape features such as Reddish Lane. The development has the capacity to provide for extensive green linkages to the eastern boundary through the retention of large informal areas of open space.
- The location of the Site will allow both proposed and existing development to use the extensive areas of open space.
- Could potentially provide formal play provision to the eastern section of the Site.
- Successfully integrate existing watercourses with proposed SUDS areas to provide for areas of new ecological value. SUDS areas to be located on localised low points of the Site to the Northern boundary.
- Successfully include for existing services as part of the development proposals with the opportunity to create green routes through the development.
- Are cognisant of the form and density levels of surrounding development, with the opportunity to provide a contextual yet distinctive design response.

08 BENEFITS AND INFRASTRUCTURE



In order to justify the release of this Site from the Green Belt the Council must in their plan making demonstrate exceptional circumstances but also ensure that this would constitute sustainable development. The NPPF states that “sustainable development is about positive growth – making economic, environmental and social progress for this and future generations.”

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable developments, which should be seen as a golden thread running through both plan-making and decision-taking.”

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.

Social Benefits

- 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.
- 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 well being.

Environmental Benefits

- 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 green-spaces 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.
- 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.

Economic benefits

- Economic growth – the Site will bring new working age families to 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 of in-commuting from elsewhere in the region.
- New jobs – building new homes creates significant numbers of new jobs in construction, 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 continued 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.
- New Homes Bonus – 165 new homes will result in a New Homes Bonus payment of £979,163 to Warrington Borough Council.

BENEFITS AND INFRASTRUCTURE



The Site will provide a range of new and expanded infrastructure to ensure that the new development is sustainable and self-sufficient, has access to day-to-day services and facilities, and is capable of integrating successfully with the existing local community.



This could include investment in:

- New recreational open spaces and play areas for children
- New school places and improved facilities for primary and secondary children
- Expanded health services, including more places in GP surgeries and dental practices
- New landscaping, including tree planting and wetland areas
- New and improved bus services and cycle lanes

Story Homes can confirm that the Site is:

- Available for development. Story Homes has an agreement with the landowner, to bring the Site forward for residential development (subject to its release from the Green Belt). There are no legal or ownership constraints to its delivery;
- Achievable and viable for residential development. It is located in a strong market area which experiences high demand for new homes and there are no overriding constraints which present an obstacle to delivery.

09 CONCLUSION



The emerging Local Plan recognises that Warrington must provide new homes both to meet the needs of its population and to underpin economic growth. Warrington Borough Council acknowledges that this cannot be achieved on brownfield land alone. Green Belt releases are essential.

This Vision Document sets out how the land at Reddish Lane, Lymm can provide a new, high quality residential development. It will provide attractive and well-built family homes as part of a sustainable natural and tranquil environment, integrated with new green and blue infrastructure. It will help Warrington to meet its growing and urgent housing needs.

The Site can be brought forward using a comprehensive masterplanning process, with significant involvement from both Warrington Borough Council and the existing local community.

This vision document provides the evidence to demonstrate that this Site in Lymm represents a logical and sustainable development opportunity where the exceptional circumstances to support its release from the Green Belt are clear. A number of technical assessments have been undertaken which confirm that there are no physical constraints or other potential impacts or environmental conditions which could preclude the development of the Site for housing. The proposed development clearly accords with the three dimensions of sustainable development as set out in the NPPF.

NEXT STEPS

The Site is in the control of a well-known high quality housebuilder (Story Homes), and is considered suitable and deliverable within the first 5 years of the emerging Local Plan period.

Story Homes are committed to progressing the emerging Concept Masterplan towards a high quality residential development that responds to the local housing need, whilst taking into account and reflecting the character of the surrounding settlement, and ensuring the development of the Site would form a new defensible Green Belt boundary to the north of the village.

Story Homes looks forward to working with Warrington Borough Council to progress the proposals for the Site and welcomes any feedback.







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