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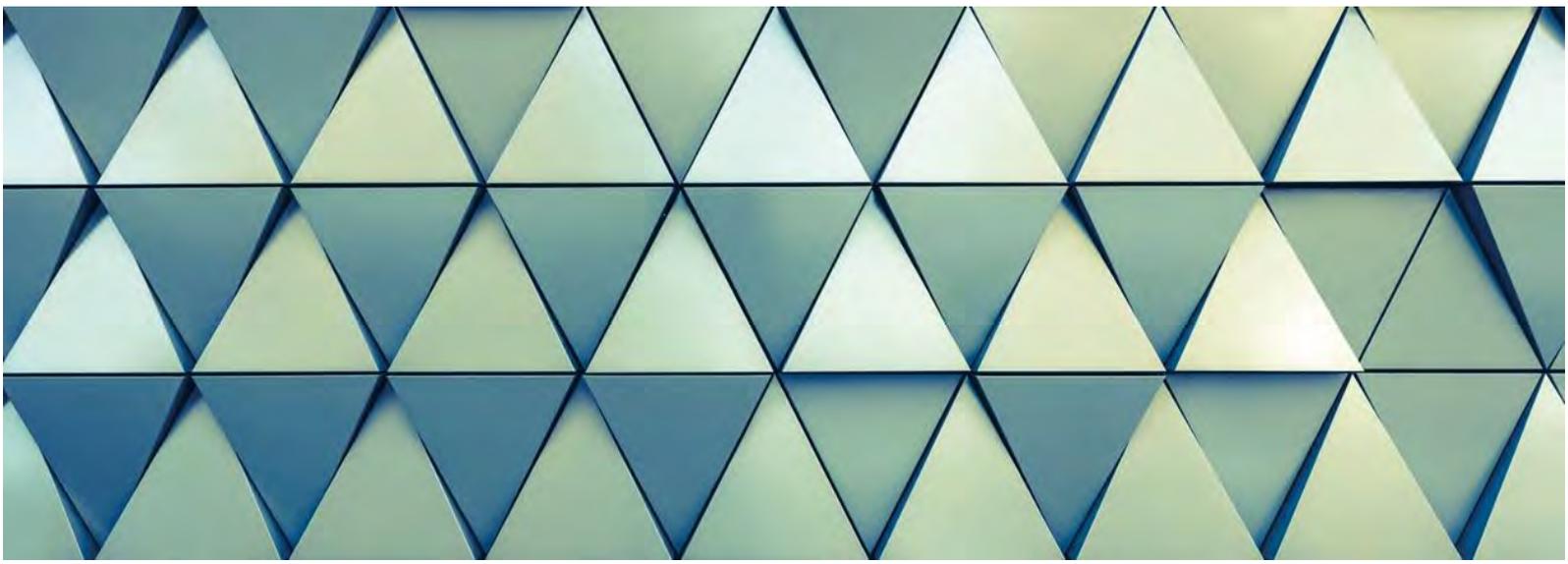
Warrington Borough Local Plan Preferred Development Option Regulation 18 Consultation (July 2017)

Representations

on behalf of Rowland Homes

New Call for Sites submission: Land east of Waterworks Lane, Winwick

September 2017



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Contents

1.0	Introduction.....	4
2.0	Representations to Preferred Development Option Consultation Document.....	5
3.0	Assessment of Evidence Base.....	14
4.0	Call for Sites: Land East of Waterworks Lane, Winwick.....	17

Appendix A: Land East of Waterworks Lane, Winwick – Location Plan

1.0 Introduction

- 1.1 We are pleased to submit, on behalf of our client Rowland Homes, representations in relation to the Warrington Borough Council Local Plan – Preferred Development Option Regulation 18 Consultation July 2017.
- 1.2 Rowland Homes are promoting land to the east of Waterworks Lane in Winwick for residential development. The site has not previously been submitted as part of a Call for Sites exercise and so this representation also demonstrates how the land off Waterworks Lane represents an available, suitable, achievable and deliverable site for housing. It is submitted that the site is capable of delivering at least 150-200 homes, or the equivalent of the final housing requirement that is to be distributed towards Winwick.
- 1.3 These representations relate to the Council's calculation of development needs and associated land requirements, and set out Rowland Homes views on the Council's preferred spatial strategy. Comments are also made on the evidence base as it relates to the Waterworks Lane site, specifically the Green Belt Assessment.

2.0 Representations to Preferred Development Option Consultation Document

2.1 We set out below Rowland Homes comments on the Preferred Development Option Consultation Document (July 2017) in response to the questions posed in the Regulation 18 Standard Response Form.

Question 1: Do you have any comments to make about how we've worked out the need for new homes and employment land in Warrington over the next 20 years?

2.2 Rowland Homes have no specific comments to make in relation to this question at this stage.

Question 2: Do you have any comments to make about how we've worked out the number of homes and amount of employment land that can be accommodated within Warrington's existing built up areas?

2.3 The PO consultation document identifies a total capacity of 15,429 homes from within the urban area. This equates to the vast majority (69%) of the total identified housing requirement for the Borough over the plan period.

2.4 In a number of instances, Rowland Homes have serious concerns with the assumptions that the Council are making in reaching this figure, and the content and quality of the evidence being relied upon. Aside from the physical and legal complexities of delivering City Centre sites for example, Rowland Homes remain sceptical that there is sufficient market demand for the proposed number of dwellings (much of which will come forward in the form of apartments) in and around the city centre.

2.5 More specific comments relating to the various components of supply from the existing built up area, specifically the City Centre, Wider Urban Area and Warrington Waterfront are provided at Questions 8, 9 and 10.

2.6 As set out and justified elsewhere within this representation, Rowland Homes have significant concerns with regards to the absence of robust evidence to justify the level of homes that are claimed will be

delivered within the Urban Area in the Plan Period. Given this source of supply amounts to the vast majority of the overall housing requirement these concerns are fundamental to the overall soundness of the emerging Local Plan strategy, a requirement of paragraph 182 of the NPPF.

Question 3: Have we appropriately worked out the amount of land to be released from the Green Belt, including the amount of land to be 'safeguarded'?

- 2.7 Rowland Homes agree with the Council that Exceptional Circumstances exist, in line with paragraph 83 of the NPPF, to justify the release of Green Belt in the Borough for development.
- 2.8 It is however submitted that the Council's preferred strategy is entirely over-reliant on sites from within the existing urban area, and in Warrington City Centre. The specific concern is that based upon past trends and the evidence base produced to inform the Local Plan Review, there is insufficient justification that the stated quantum of housing can actually be delivered.
- 2.9 To ensure the new Local Plan is justified, effective and therefore 'sound' in accordance with paragraph 182 of the NPPF, a greater level of housing development needs to be directed elsewhere in the Borough – necessitating the release of more Green Belt than is currently being proposed in the PO consultation document. This will help to ensure that sufficient flexibility is built into the Plan and that the revised Green Belt boundaries are capable of enduring beyond the Plan period.
- 2.10 Our response to Question 13 related to development in the Outlying Settlements further expands upon this concern as it relates to Winwick.

Question 4: Do you agree with the new Local Plan Objectives?

- 2.11 Rowland Homes have no specific comments to make in relation to this question at this stage.

Question 5: Do you have any comments to make about how we've assessed different 'Spatial Options' for Warrington's future development?

- 2.12 Rowland Homes have no specific comments to make in relation to this question at this stage.

Question 6: Do you have any comments to make about how we've assessed different options for the main development locations?

- 2.13 Whilst Rowland Homes broadly support the strategy to direct the majority of development towards the Warrington Urban Area, it is considered that the current proposed distribution of development is weighted too heavily towards the urban area and the evidence base produced to support the strategy is unjustified. Accordingly, our client is disappointed that the *Area Profiles and Options Assessment Technical Note ("Area Profiles 2017")* does not fully consider Option for 'main development locations' which considers a lower number of dwellings in the Urban Area and a greater dispersal to the outlying settlements. With reference to paragraph 2.3 of the *Options Assessment Technical Note*, this approach appears to have been ruled out as an option in principle, which results in an inflexible consideration of all reasonable alternatives.
- 2.14 The apparent determination to maximise development towards the Urban Area raises concerns that rather than planning positively for the outlying settlements – ensuring a level of growth sufficient to deliver the required infrastructure - the outlying settlements are treated more as places to direct 'spill-over' requirement. In this way, the methodology for identifying the main growth locations risks is missing the opportunity to support carefully considered, sustainable and plan-led growth in the outlying settlements and assist in the delivery of key infrastructure, as well as supporting existing facilities and services.

Question 7: Do you agree with our Preferred Development Option for meeting Warrington's future development needs?

- 2.15 Rowland Homes broadly supports the rationale of the Council's preferred spatial approach, which directs Green Belt release adjacent to the main urban area of Warrington with some development apportioned to the outlying settlements. The concern is however that the quantum that is to be directed to the Urban Areas is unrealistic based upon all available evidence. Not only does this raise doubts as to the effectiveness, flexibility and deliverability of the proposed strategy, but it also means that the outlying settlements do not receive the necessary level of housing growth needed and therefore investment in infrastructure delivery that a more balanced approach would deliver.

- 2.16 Paragraph 4.2.24 of the *Sustainability Appraisal* recognises that 'incremental' housing growth in the outlying settlements will support local services and widen local housing choice without comprising their character. However, with specific reference to Winwick, Rowland Homes are of the view that the 90 additional dwellings (plus the 21 identified in the SHLAA) to be distributed towards the settlement is insufficient.
- 2.17 An increased level of development in the outlying settlements, including Winwick would better assist in meeting the significant shortage in affordable housing that exists, and could support the viability of existing community facilities, whilst presenting the opportunity to secure new and improved facilities.
- 2.18 In Rowland Homes view, a housing figure of between 150 and 200 dwellings must be proposed at Winwick over the plan period.
- 2.19 Overall, Rowland Homes contend that a more balanced approach to the distribution of development should be taken by directing a greater proportion of the housing requirement towards all outlying settlements, including Winwick.

Question 8: Do you have any comments to make about our Preferred Development Option for the City Centre?

- 2.20 Rowland Homes support the Council's ambitions to regenerate Warrington City Centre. The number of dwellings which are identified as coming forward from this source is however, considered wholly unrealistic. Table 11 of the PO consultation document identifies 3,526 dwellings as capable of coming forward from the City Centre, and 4,032 from the Waterfront Area. Taken together, the proposed strategy anticipates that 33% of the total housing requirement for the Borough (7,558 dwellings) will be delivered in the City Centre/ Waterfront Area. It is in the context of this heavy reliance on the City Centre to deliver housing, that Rowland Homes raise the following significant concerns about the deliverability assumptions the Council have reached for these sites over the plan period.
- 2.21 Having reviewed the *Urban Capacity Assessment Update (July 2017)*, the *Strategic Housing Land Availability Assessment (SHLAA 2015 and 2017 Update)*, and the *City Centre Masterplan* information for the City Centre, it is evident that the identified housing sites within the town centre will only come forward as part of a comprehensive regeneration of large parts of the existing heart of the City. The sites making up this source of the supply are complex. In most instances they have active uses, varied

ownerships and face considerable physical constraints to their development. The majority will only be able to come forward for development in conjunction with adjacent sites, and many require significant infrastructure provision before they can be delivered.

2.22 Whilst we appreciate that considerably more information behind the City Centre proposals has been made available than at the time of the Local Plan *'Scoping Consultation'* in December 2016, the evidence still seems very limited and it is not clear on what basis the Council can have confidence certain sites are deliverable as envisaged. Of particular concern are apparent inconsistencies around likely phasing. Alongside the *Urban Capacity Assessment Update (July 2017)*, the Council are consulting on an *Overall Development Sites Phasing Plan ("Phasing Plan")* for the City Centre. However, no justification or explanation for this is provided, and in many instances the anticipated timescales appear to contradict the other available evidence. A number of the sites which are indicated for development in the short-term (0-5 years) on the *Phasing Plan* are, in contrast, considered in the *2017 SHLAA* to not be developable until the medium term (6-10 years), or even the long term (11 – 15 years).

2.23 In light of the complexities of site assembly and infrastructure delivery in this area (and the absence of any mechanisms to achieve it), the inconsistencies contained within the evidence base and the absence of a robust demonstration that this quantum of housing is deliverable, Rowland Homes treat the 3,526 dwellings anticipated to come forward within the City Centre with a great deal of caution. Alternative sites must be identified in order that the Local Plan provides sufficient flexibility in respect of housing delivery given the clear indication that the City Centre will fail to deliver the required level of housing during the plan period.

Question 9: Do you have any comments to make about our Preferred Development Option for the Wider Urban Area?

2.24 Table 11 of the PO Consultation Document anticipates that 4,869 dwellings will be delivered from the 'Wider Urban Area' of Warrington. No breakdown of this figure is provided and it is not clear how it has been calculated. It is understood that the strategic site of Omega, to the north west of Warrington, and Peel Hall, to the north of the urban area, counts towards this source of supply.

2.25 In order to have confidence that the stated quantum development will come forward within the Plan Period, it is important that the Local Plan allocates a range of sizes and types of site, rather than relying

on a small number of strategic sites. By their nature, large strategic sites require substantial supporting infrastructure to come forward in the form of new road networks, public transport connections, gas, water, electricity and telecoms connections and local facilities and amenities. Specifically, the PO consultation document (paragraph 5.22) identifies the need for major transport improvements and a new primary school at Peel Hall to ensure the site can be developed. At Omega, the proposals involve the creation of a new train station at West Warrington and upgrading of Junction 8 of the M62.

- 2.26 Given the substantial infrastructure required, the delivery of larger strategic sites is more challenging and subject to longer lead in times than when compared to smaller scale sites. Recent research by Lichfields¹ found that the average lead in time for sites over 1,500 dwellings from identification to planning approval is around 10 years, plus 1 – 2 years before the first dwelling is even delivered. The convoluted process for large-scale sites is exemplified by the application for a new mixed use neighbourhood at Peel Hall which was submitted in August 2016 (reference: 2016/28492). Despite being included within the 'urban capacity' figure for the purposes of the emerging Local Plan, the Council refused the application in February 2017 on the grounds of lack of information regarding the impact on the local highway network and the lack of a Section 106 Agreement. An appeal was lodged against this refusal in July 2017. The appeal process for this site will likely take at least a further 6 months, pertinently demonstrating the lengthy delays typical of this scale of project.
- 2.27 Paragraph 14 of the NPPF states that Local Plans should be able to sufficiently adapt to rapid change. An over-reliance on these two strategic sites, which will inevitably have long lead-in times to delivery, fails to provide the necessary degree of flexibility to ensure that the plan is 'effective' and facilitates the level of housing delivery it needs to during the plan period.
- 2.28 A genuine range and quantum of sites should be distributed towards sustainable locations across the whole borough in order to provide confidence that the housing requirement can be considered deliverable over the plan period.

¹ *Start to Finish: How quickly do Large-Scale Housing Sites Deliver?* November 2016. (Nathaniel Lichfield & Partners)

Question 10: Do you have any comments to make about our Preferred Development Option for developing the Warrington Waterfront?

2.29 Similar concerns regarding the robustness of the submitted evidence apply to the proposals for Warrington Waterfront. This area is identified as having a capacity to deliver 4,032 dwellings over the plan period. It faces a range of constraints, primarily flood risk and access. The deliverability of the Waterfront area is reliant on key infrastructure projects being completed to overcome existing constraints – namely the Warrington Western Link road which will connect the A56 to the A57. The link road must cross Sankey Brook, the St. Helen’s Canal, the Mersey, the railway line and the Manchester Ship Canal.

2.30 Table 18 of the LP Preferred development Option consultation paper suggests that 728 dwellings will be delivered in Years 0-5 and then 795 dwellings in Years 6-10. Associated with this table, paragraph 5.26 explicitly states that the *‘Waterfront development is dependent on the delivery of the ‘Western Link’ connection.’* Paragraph 5.27 then confirms:

‘The final development site layout will need to be amended following confirmation of the preferred route of the Western Link. This may impact on the capacity for new homes and employment land identified above. Similarly the development trajectory will also be dependent on the final alignment and delivery of the Western Link connection. The final site layout, capacity and trajectory will all be reviewed ahead of the publication of the submission version of the Local Plan to ensure it reflects the preferred route and latest timetable for the Western Link programme.’

2.31 It is clear at this stage that in the absence of any confirmation that the Western Link Road can actually be delivered, no certainty can be provided in respect of whether residential development at the Waterfront Area is feasible. Even if it is, the timing for delivery of the Western Link Road is unknown. The following factors confirm that even in the most optimistic of circumstances, no housing will be delivered during Years 0-10:

- Consultation is currently taking place in respect of potential route options;
- DfT funding has not yet been applied for to deliver the Link Road;
- Any CPO procedure is some way off commencing;

- Given the physical barriers the Link Road will need to overcome, this is a significant undertaking that will take several years to construct and complete.

2.32 The delivery of housing in this area is dependent on this complex project coming forward. On this basis, Rowland Homes are of the view that unless definitive confirmation can be provided that the Western Link Road is deliverable, the 4,023 dwellings anticipated to come forward in the Waterfront area cannot be relied upon to meet Warrington's future housing requirements and alternative sources must therefore be identified.

2.33 In the absence of any reasonable alternatives within the existing urban area, additional housing must be directed towards suitable sites on the edge of the outlying settlements, including Winwick, in order that objectively assessed needs for market and affordable housing can be met in full during the plan period as required by paragraph 47 of the Framework.

Question 11: Do you have any comments to make about our Preferred Development Option for the Warrington Garden City Suburb?

2.34 Rowland Homes have no specific comments to make in relation to this question at this stage.

Question 12: Do you have any comments to make about our Preferred Development Option for the South Western Urban Extension?

2.35 Rowland Homes have no specific comments to make in relation to this question at this stage.

Question 13: Do you have any comments to make about our Preferred Development Option for development in the Outlying Settlements?

2.36 The PO consultation document and the Area Profiles 2017, outlines that the Council's preferred spatial strategy approach is focusing Green Belt release adjacent to the main urban area of Warrington, with incremental growth in the outlying settlements, which includes Winwick.

2.37 Whilst Rowland Homes accepts the principal of this spatial approach, we are concerned that the level of growth currently proposed to the outlying settlements within the PO document is insufficient, particularly at Winwick, to:

- (a) Rebalance the settlements aging population demographic by retaining within and attracting in, young newly forming households;
- (b) Deliver a full range of housing types and sizes, but with an emphasis on small to medium-sized family homes, and homes (including specialist accommodation) suitable for elderly residents;
- (c) Meaningfully respond to worsening sub-Borough housing affordability issues and affordable housing needs;
- (d) Support primary school expansion; and

2.38 In light of our responses to Questions 8, 9 and 10 in particular that raise serious questions regarding the ability of the existing urban area to deliver the stated quantum of housing, the need to increase the distribution of housing towards the outlying settlements, including Winwick, if fully justified.

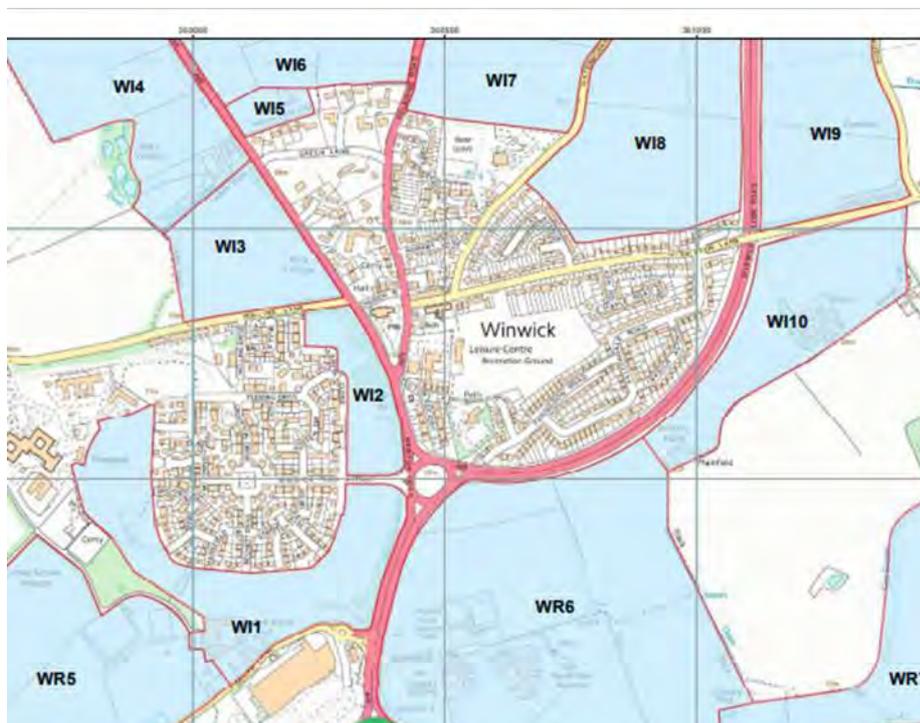
Questions 14 to 17

2.39 Rowland Homes have no specific comments to make in relation to these questions at this stage.

3.0 Assessment of Evidence Base

Green Belt Assessment (October 2016) and Green Belt Assessment Addendum (June 2017)

3.1 We have reviewed the Green Belt Assessment (GBA) (July 2017) prepared by Warrington Borough Council to inform the release of Green Belt sites in Warrington and the outlying settlements. The site has been considered within the 2016 Warrington Borough Council Green Belt Assessment as part of parcel W18 and it was considered that this parcel offered a strong contribution in assisting the safeguarding of the countryside from encroachment. An extract from the GBA is provided below for ease of reference:



Source: GBA Assessment – Appendix F (Parcel Maps)

3.2 However, Rowland Homes consider that the results of the assessment of this parcel do not reflect the characteristics of this much smaller parcel of land. Therefore, for the purposes of this submission, we have undertaken the following assessment of the site itself that we trust will prove useful.

Table 1: Nexus Green Belt Assessment of Land East of Waterworks Lane site in comparison with the GBA Assessment of parcel WI8

Purpose for including land within the Green Belt	GBA conclusion of WI8	Nexus Conclusion of Land East of Waterworks Lane site
<p>Purpose 1: <i>To check the unrestricted sprawl of large built-up areas</i></p>	<p>No Contribution</p>	<p>No Contribution</p>
<p>Nexus Assessment of Waterworks Lane site: The site is not adjacent to the Warrington urban area, therefore this purpose is not applicable.</p>		
<p>Purpose 2: <i>To prevent neighbouring towns merging into one another</i></p>	<p>Weak contribution</p>	<p>Weak Contribution</p>
<p>Nexus Assessment of Waterworks Lane site: Agree with the GBA conclusion that the site forms a less essential gap between the Warrington Urban area and Newtown-le-Willows and therefore makes a weak contribution to preventing towns from merging.</p>		
<p>Purpose 3: <i>To assist in safeguarding the countryside from encroachment</i></p>	<p>Strong Contribution</p>	<p>Weak Contribution</p>
<p>Nexus Assessment of Waterworks Lane site: While the wider parcel of land (WI8) extended beyond the farm dwelling (Highgate Farm) and thus had stronger connections with open countryside, this representation promotes the southern part of this wider parcel. This smaller portion comprises of strong defensible boundaries on the west, southern and eastern sides of the site. Further, the presence of the farm located to the north serves to interrupt the open long line views out to the open countryside and prevent further encroachment therefore the development of the parcel of land to the south of this dwelling is unlikely to contribute to a further reduction in the degree of openness. Overall, it is submitted that the smaller subject site makes a weak contribution to protecting the countryside from encroachment.</p>		
<p>Purpose 4: <i>To preserve the setting and special character of historic towns</i></p>	<p>No Contribution</p>	<p>No Contribution</p>
<p>Nexus Assessment of Waterworks Lane site: The site is not adjacent to a historic town and therefore this purpose is not applicable.</p>		
<p>Purpose 5: <i>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</i></p>	<p>Moderate Contribution</p>	<p>Moderate Contribution</p>
<p>Nexus Assessment of Waterworks Lane site: The site makes a moderate contribution towards this purpose, which is consistent with the approach taken in respect all other sites</p>		
<p>Overall Contribution</p>	<p>Moderate Contribution</p>	<p>Weak Contribution</p>

3.35 Our assessment of the Land East of Waterworks Lane site confirms that overall it makes a **weak contribution** towards the five purposes of including land within the Green Belt. On this basis, the site should be considered suitable for housing development and released from the Green Belt.

Inconsistent approach taken in GBA

3.36 When considering the conclusions reached in respect of other parcels around Winwick, it is clear that the Waterworks Lane site is the most appropriate site to be considered for release from the Green Belt.

3.37 Notwithstanding our own assessment of the smaller site set out above, only parcels WI1, WI2 and WI9 are considered to make a 'weak' contribution towards the purposes of including land within the Green Belt in the GBA. Parcels WI1 and WI2 perform the function of public open space associated with a modern housing development centred around Winwick Park Avenue and so are not considered available for the purposes of identifying deliverable sites as Housing Allocations.

3.38 We consider that the approach taken in respect of Parcel WI9 is inconsistent with the assessment of Parcel WI8. Parcel WI9 was considered to make a 'weak' contribution towards the purposes of the Green Belt. However, it is located on the opposite side of the Winwick Link Road, which forms a clear and durable boundary that contains the core of the settlement of Winwick. To release this parcel for development ahead of Parcel WI8 would be entirely at odds with the logical expansion of the settlement of Winwick. It would represent isolated development, is situated further away from the shops and services available in the centre of Winwick and as such is not the most appropriate and sustainable location for Green Belt release.

Conclusion in respect of GBA and the suitability of the Waterworks Lane site for release from the Green Belt

3.39 Having reviewed the conclusions of the GBA and undertaken our own assessment of the Waterworks Lane site in isolation against the five purposes of the Green Belt, it is clear that the evidence base supports our view that this site is the most appropriate location for Green Belt release in Winwick.

4.0 Call for Sites: Land East of Waterworks Lane, Winwick

Introduction

- 4.1 The landowner has not previously submitted this site for consideration in any previous Call for Sites exercises. Rowland Homes are now promoting Land East of Waterworks Lane (hereafter referred to as 'the site') for residential development and so this section of the representation is a Call for Sites submission, requesting that the site is released from the Green Belt and identified as a Housing Allocation as part of the Local Plan Review. A Location Plan is provided at Appendix A.
- 4.2 We submit the following information to demonstrate the availability, suitability, achievability and therefore deliverability of the site for housing development. The suitability of the site's release from the Green Belt is also justified, as the site itself is considered to make a weak contribution to the five purposes of the Green Belt.
- 4.3 With regard to the physical characteristics of the site and its relationship with the existing settlement, we explain why the site is well placed to help meet identified housing needs in Warrington over the next plan period.

Site and Surrounding Area

- 4.4 The site comprises approximately 8.8 hectares of Green Belt land to the north east of Winwick. The site is located outside of, but immediately adjacent to, the existing settlement boundary, with the existing built-up area of Winwick located immediately to the south and south-west. The site comprises of one agricultural field. It is surrounded by existing roads on its eastern and north-western boundaries. Trees are also present along the boundaries of the site but there is no vegetation or other physical features of note within the site itself.
- 4.5 The area surrounding the site can be described as follows:
- **To the North:** The northern boundary of the site is formed by an existing field boundary, comprising a low-level hedgerow. Beyond this is a large agricultural field and an existing collection of farm buildings, which includes Highfield Farm shop.
 - **To the East:** The eastern boundary of the site is formed by well-established trees which act as a buffer, separating the site from the A49 (Winwick Link Road dual carriageway) which

runs parallel to the eastern boundary. Beyond the A49 and separated by a further row of well-established trees, is open countryside.

- **To the South:** The southern boundary of the site is formed by the boundary of the existing properties along Myddleton Lane. Beyond this lies a concentration of suburban style residential development comprised of Ash Road, Maple Road, Falcondale Road, Linkside Avenue, Faringdon Road and St Anthony Place.
- **To the West:** The south-western boundary of the site is formed by the boundary of the existing properties along Ilex Avenue, which are also suburban in character. The north-western boundary is formed by a sporadic tree line. Waterworks Lane runs along the full extent of the north-western boundary and beyond this (shielded by a well-established tree line) is Winwick Water Treatment works. Overhead power lines are also present along the north-western boundary, but do not appear to encroach onto the main body of the site.

Demonstrating Deliverability

4.6 Footnote 11 to paragraph 47 of the National Planning Policy Framework (hereafter referred to as 'the framework') sets out that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. For absolute clarity, we go on to consider in turn how the site meets these required tests of deliverability.

Available

4.7 The identified site is under the ownership of a single landowner. This submission confirms that Rowland Homes now have an active interest in the site and so the landowners are supportive of the development of the site for residential dwellings.

4.8 Rowland Homes Limited are a long-established regional house-builder with a track record of delivering new, good quality homes in the area. They are now actively promoting the 8.8 hectare site for development and would be committed to developing the site upon receipt of the necessary planning consents.

4.9 The extent of landownership abuts the public highway in the form of the A49 (Winwick Link Road) to the east and Waterworks Lane to the west. Development of the site would therefore not be subject to

any ransom strips or covenants that might otherwise hinder its development for new housing. As such, there would be nothing to prevent the site from being delivered immediately and commenced within 5 years upon receipt of the necessary planning consents. Accordingly, the site can be considered available.

Suitable

- 4.10 The site is immediately adjacent to the residential settlement of Winwick and therefore, this site will benefit from access to the established local facilities and services as well as frequent public transport connections to larger destinations.
- 4.11 Within Warrington Borough Council's Preferred Development Option (Regulation 18) Consultation Document, it was confirmed that the preferred spatial distribution of new development should comprise the release of Green Belt land adjacent to the main urban area of Warrington, with incremental growth in the outlying settlements. As a relatively small-scale outlying settlement, Winwick has been allocated an indicative Green Belt capacity of 90 homes. As set out within our representation, it is considered that a greater proportion of housing should be distributed towards Winwick and within this context, this site is capable of accommodating Winwick's housing needs in its entirety.
- 4.12 Winwick is tightly surrounded by Green Belt, which has prevented any major housing growth from coming forward in the previous plan period. It is however accepted within the Preferred Development Options document, and it is welcomed by Rowland Homes, that Green Belt release is necessary in Winwick in order to meet future housing needs. It is clear that the Waterworks Lane site represents the most appropriate location for Green Belt release in Winwick following our review of the Green Belt Assessment (October 2016) and the individual site assessment undertaken in Section 3 of this representation.

Achievable

- 4.13 The physical characteristics and technical considerations relating to development of the site are considered in further detail below. This reveals that there are no physical constraints which would prevent the site from coming forward for housing.
- 4.14 Rowland Homes are now promoting this site for residential development in light of the absence of any physical constraints and the strong housing market in the area, it can be confirmed that the delivery of

housing on this site is viable. It has the potential to deliver at least 150 - 200 dwellings or the equivalent of the final housing requirement that is to be distributed to Winwick.

Sustainable Location

4.15 The site's position within the durable boundary of the A49 ensures that it is able to take full advantage of the services and facilities located in the village centre, situated approximately 300m to the south-west of the site. Situated adjacent to the existing settlement, this ensures that the site is located within walking distance of all the following service and facilities:

- 350m to the south west of the site is Winwick CE Primary School and Winwick Leisure Centre;
- The local shop (Thoroughgoods) is located approximately 350m to the southwest of the site and Highfield farm shop is located approximately 200m to the north of the site;
- The local pub (the Swan) is located approximately 500m to the south west of the site; and
- St Oswald C of E Church is located approximately 450m to the south west of the site.

4.16 The site is also well served by public transport. Two bus stops are located within 500m of the site – Ilex Avenue stop to the south of the site and the Post Office stop to the southwest. These bus stops are served by bus route 19, which offers a regular daily service to Warrington, Leigh and Culcheth. A further bus stop located 550m west of the site, along Newton Road – the St Oswald Church stop – provides access to routes 22, 22E and 24E, which offer regular daily services to Warrington, Bruntwood, Earlestown and Vulcan Village.

4.17 Newton-le-Willows train station is located approximately 3.2km to the north west of the site, which is within an accessible cycling distance of the site. Regular routes include daily services to Warrington Bank Quay, Manchester Piccadilly, Manchester Victoria and Liverpool Lime Street.

4.18 It is clearly demonstrated that the site is in a highly sustainable location and will provide residents with access to a wide range of facilities, including a local shop, leisure centre, primary school and church, as well as frequent public transport services, which provide access to a much wider range of retail, leisure and employment opportunities.

Technical Considerations

Access and Highways

- 4.19 Vehicular access to the site is capable of being achieved directly from Waterworks Lane, which is a two-way, single carriage road that forms the western boundary of the site. National speed limit (60mph) is in place along the portion of the road that abuts the site. However, a 30mph speed limit currently extends from the centre of Winwick, along Waterworks Lane, ending just to the south of the site. It is therefore anticipated that that this speed limit can be extended northwards if considered necessary.
- 4.20 An existing pavement runs along Waterworks Lane (through the existing residential area), however it ends where the site meets Waterworks Lane, along the western boundary. It is anticipated that this pavement will be extended into the site in order to ensure that safe and convenient pedestrian access can be achieved.
- 4.21 Junction 22 of the M62 motorway is situated approximately 1.2km south west of the site.
- 4.22 The location of the site in relation to the local highway network is a significant material advantage when considering the suitability of the site for accommodating the future housing requirement for Winwick.

Flood Risk and Drainage

- 4.23 The site is wholly located within Flood Risk Zone 1 with reference to the Environment Agency flood maps and therefore residential development would be entirely acceptable in flood risk terms. There are no topographical constraints that would automatically prevent the implementation of a drainage strategy for development of the site.

Utilities

- 4.24 It is anticipated that residential development on the site will be able to connect to the existing utilities networks which serve the area. The presence of the relevant utilities networks in the area is evident given the presence of a significant quantum of residential development to the south. Further investigations and enquiries would reveal any improvement works or on site provision deemed necessary.
- 4.25 Overhead power lines are present along the western boundary, however, they do not represent a constrain to future development of the site.

Trees

- 4.26 The site has been used for arable farming and as such, the site has very limited vegetation other than hedgerow along the northern boundary. There are no trees located within the main body of the site and a large number of trees are present along the eastern, southern and western boundaries. It is anticipated these trees and hedgerows would be retained and along with new planting, this will help to ensure that the new development integrates positively with the surrounding area.
- 4.27 A search on Warrington Councils interactive planning system has revealed that none of the trees on the site are subject to a Tree Preservation Order.

Ecology

- 4.28 There are no designated sites of nature conservation interest within or adjacent to the site. Given the agricultural use of the site, the majority of habitats within the site are common and only of local value. As set out above, existing trees and hedgerows will be incorporated into any future development layout along with appropriate buffers to preserve their value as wildlife habitat. Opportunities for ecological enhancement would be incorporated into any future development such that there would be a net biodiversity gain to the proposals.
- 4.29 Overall, given the nature and location of the site, there are no overriding constraints to its development in respect of biodiversity and it is considered the site can be delivered in a manner which provides appropriate mitigation and enhancements.

Heritage and Archaeology

- 4.30 The site is not located within a Conservation Area, nor are there any listed buildings on or immediately adjacent to the site. A search of Historic England's records have also not revealed any features of interest on the site.
- 4.31 To the west of the site two dwellings are recognised as Locally Listed Buildings - Southern Waterworks Cottage and Northern Waterworks Cottage. Given the distance from the site, it is not anticipated that the intended housing development would have an impact on the setting or significance of these heritage assets.

Agricultural Land

4.32 The site and the immediately surrounding land has been identified as Grade 3 agricultural land and as such is less valuable and more suitable for release than much of the land to the south of Winwick, which is identified as higher quality Grade 2 land. Development of this site would therefore protect the best and most versatile agricultural land, which is in accordance with the Framework.

Summary

4.33 We trust the above information is useful. It clearly demonstrates that the site at Waterworks Lane is well placed to make an important contribution towards meeting Warrington's future housing requirements and represents the most suitable location for housing in Winwick.

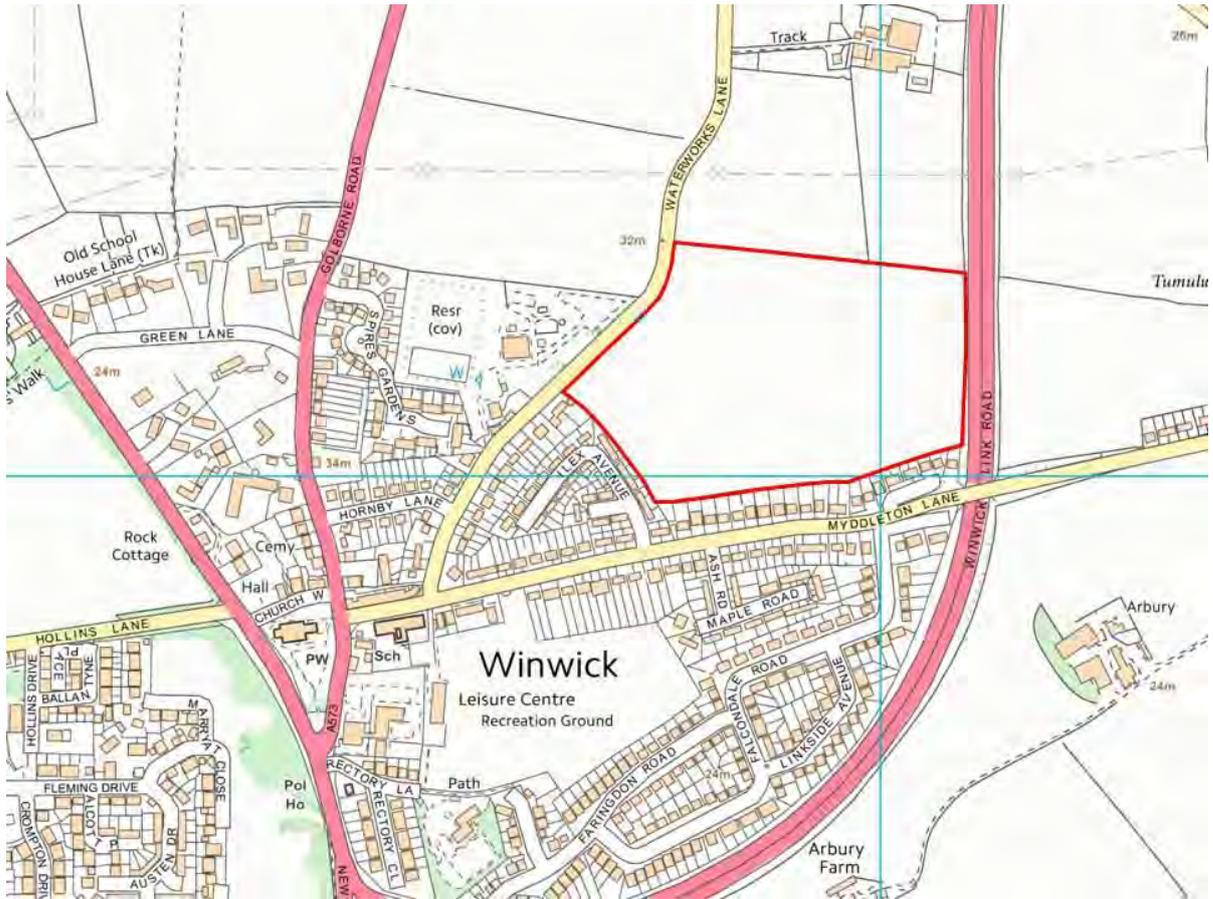
4.34 There are no physical, legal or environmental constraints which would prevent the site from coming forward for housing development.

4.35 It has been demonstrated that the site is deliverable in line with the tests set out in footnote 11 of the NPPF in that it is available, suitable and achievable with no reason to believe that housing would not be delivered on the site within the next 5 years upon the granting of the necessary consents.

We trust that the above information is useful and that this Call for Sites submission will be taken into account along with our headline representation as part of the Local Plan Review process.

Appendix A

Location Plan - Land East of Waterworks Lane, Winwick





**Warrington Local Plan Preferred Development Option
Regulation 18 Consultation (July 2017)**

Representations

on behalf of Rowland Homes

September 2017

London

Birmingham

Manchester

Thames Valley