



Warrington Local Plan Examination

Hearing Statement – Matter 7e (Site Allocation: Winwick)

On behalf of **Rowland Homes**



Rev: 0 | Date: August 2022

Registered Office: [REDACTED]
Office Address: [REDACTED]
T: [REDACTED] E: [REDACTED]

Document Control Sheet

Project Name: Warrington Local Plan Examination

Report Title: Hearing Statement – Matter 7e (Site Allocation: Winwick)

Date: August 2022

	Name	Position	Signature	Date
Prepared by:	Michael Gilbert	Senior Associate	MG	August 2022
Reviewed by:	Bernard Greep	Director	BG	August 2022
Approved by:	Bernard Greep	Director	BG	August 2022
For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved

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1 Introduction

- 1.1.1 This Hearing Statement has been produced by Stantec on behalf of Rowland Homes and is submitted to the Warrington Local Plan examination in relation to Matter 7e (Site Allocation: Winwick).
- 1.1.2 Rowland Homes controls a site which is within the presently defined Green Belt, adjacent to the settlement boundary of Winwick, to the east of Waterworks Lane (hereafter referred to as ‘the Rowland Homes site’). We have submitted representations at earlier stages of the Local Plan consultation process which demonstrate that the Rowland Homes site represents a suitable, sustainable and deliverable candidate for housing development and should be allocated instead of, or in addition to, the proposed allocation site that is currently selected under Policy OS6 of the draft Local Plan (‘Land to the north of Winwick’, hereafter referred to as ‘the proposed allocation site’).
- 1.1.3 Our previous submissions, which should be read alongside this Hearing Statement, demonstrated that the proposed allocation site is significantly more constrained than the Rowland Homes site. The development of the proposed allocation site would have a long term moderate adverse landscape and visual impact which is difficult to mitigate due to the physical characteristics of the site, in contrast to the Rowland Homes site, which is less sensitive to development, relates better to the existing urban area and is capable of appropriate mitigation.
- 1.1.4 We also showed that the Rowland Homes site extends no further north than the current development pattern established by the residential properties to the west off Green Lane Close, and is highly enclosed on all sides by existing development, trees/vegetation and roads. Furthermore, we highlighted that the proposed allocation site contains pylon structures and overhead power lines, is situated upon higher ground than the Rowland Homes site, and is located adjacent to a Registered Battlefield.
- 1.1.5 We maintain that the Rowland Homes site represents a demonstrably more sustainable option to accommodate additional residential development adjacent to Winwick than the proposed allocation site, the development of which has the potential to result in greater adverse effects in terms of harm to the Green Belt, landscape and heritage impacts, and which is more physically constrained and out of kilter with the current settlement pattern.
- 1.1.6 We have reviewed the submission version of the Local Plan and the accompanying evidence base documents, and have significant concerns in relation to the Council’s site assessment and selection process. We do not consider that the proposed allocation is justified, effective and consistent with national policy.
- 1.1.7 In this Hearing Statement we focus on the Matter 7e questions posed by the Planning Inspectors insofar as they relate to our client’s land and our strong reservations over the soundness of the site assessment and selection methodology applied by the Council when deciding to allocate site OS6 over other more sustainable alternatives.

Figure 2.2 Proposed Allocation Site and Rowland Homes Site in Context



- 2.1.5 Furthermore, the Rowland Homes site is demarcated by much stronger boundaries than the proposed allocation site. The site is bounded to the west by Waterworks Lane, beyond which is existing built development; to the east by Winwick Link Road (A49); to the south by existing residential uses which front onto Myddleton Lane and Ilex Avenue; and to the north by an existing field boundary hedgerow.
- 2.1.6 In stark contrast, the proposed allocation site is bounded to the west by Golborne Road, beyond which there is no existing built development; to the east by Waterworks Lane; and to the south by approximately three existing residential properties as well as an open, covered reservoir and a water treatment works.
- 2.1.7 Whilst the proposed allocation site is less well-enclosed than the Rowland Homes site, we are particularly concerned by the text within the submission Local Plan Policy OS6 (page 252) which states that a *'landscape scheme will be required that reinforces these Green Belt boundaries, particularly the hedgerow along the northern boundary'* [our emphasis added]. The northern boundary of the proposed allocation site is devoid of any hedgerow vegetation and is delineated by a very lightweight post and wire fence which separates the site from further large agricultural fields to the north. The text in the submission Local Plan is therefore plainly erroneous as it refers to a non-existent hedgerow.
- 2.1.8 An extract from the 'Landscape and Visual Analysis' plan, which is contained within the 'Landscape and Visual Appraisal' report we previously submitted in June 2019, is provided below as Figure 2.3. The plan clearly shows that the Rowland Homes site is much better related to existing built development in Winwick than the proposed allocation site and has far more defensible existing boundaries in Green Belt terms that the proposed allocation site.

Figure 2.3 Proposed Allocation Site and Rowland Homes Site – Relationship with Existing Built Form (shown in orange hatching) and Existing Boundaries



- 2.1.9 The collated Green Belt Assessment (September 2021) contains an assessment of the Rowland Homes site under site ref. 3334. The site is adjudged to make ‘no’ contribution in relation to the first and fourth Green Belt purposes; a ‘weak’ contribution in terms of the second Green Belt purpose; a ‘strong contribution’ regarding the third Green Belt purpose; and a ‘moderate’ contribution in relation to the fifth Green Belt purpose. Overall, the site is assessed as making a ‘moderate’ contribution to the Green Belt purposes. The assessment also recognises that the site’s boundaries with the countryside are predominantly durable and could contain development and prevent it from threatening the overall openness and permanence of the Green Belt.
- 2.1.10 The proposed allocation site is adjudged to make exactly the same level of contribution to each of the five Green Belt purposes as the Rowland Homes site, and therefore also makes a ‘moderate’ overall contribution to the Green Belt. However, we are extremely concerned by the text contained in the ‘Justification for Assessment’ column which makes the following bizarre remarks: *‘the boundaries with the countryside are predominantly durable apart from the northern boundary however the M6 is located further north. This is a very durable boundary. Thus any development would be contained and would therefore not threaten the openness and permanence of the Green Belt’* [our emphasis added].
- 2.1.11 Whilst the Green Belt Assessment clearly acknowledges that the northern boundary of the site is not durable, it then goes on to erroneously reference the M6 motorway to the north and states that this is a very durable boundary which will contain development at the site. This is quite obviously incorrect as the M6 is a considerable distance from the northern boundary of the proposed allocation site, and therefore has no bearing on the durability of the northern site boundary. Indeed, the same could be said of the Rowland Homes site in terms of the M6, albeit as stated there is no logic to any reference to the motorway in either case.

- 2.1.12 We therefore have significant concerns about the robustness and logic of the Green Belt Assessment, and therefore the conclusions reached about the allocation site and the Rowland Homes site. Indeed, in our view the assessment does not properly reflect the nature of the Rowland Homes site in terms of its boundaries, or the realistic contribution that the site makes to the Green Belt purposes. In particular, we reiterate that the site's northern boundary comprises an existing field boundary hedgerow, in contrast to the northern boundary of the proposed allocation site which is devoid of hedgerow vegetation and is delineated by a post and wire fence.
- 2.1.13 We therefore maintain that the Rowland Homes site should be adjudged to be performing a 'weak' overall role in relation to the Green Belt purposes, rather than a 'moderate' role. Furthermore, it is abundantly clear that the Rowland Homes site is a more logical candidate for release, given its stronger boundaries and its more limited encroachment into the countryside than the proposed allocation site. In contrast, the proposed allocation site has no defensible northern boundary, and the effect of its development is that it would represent a much greater incursion into the Green Belt.
- 2.1.14 We are also deeply concerned by the comments and conclusions reached in the Green Belt Assessment, which could potentially be indicative of a more widespread issue that affects other sites and may go to the heart of some of the other Green Belt allocations. We invite the Inspectors to review the comments in the Green Belt Assessment, as it will become immediately apparent that the approach taken in this case is fundamentally flawed. If similar issues can be identified elsewhere then the soundness of other policies relating to the release of land from the Green Belt could be drawn into question.

Question 5 – What is the basis for the scale of development proposed and is this justified? Could this be readily accommodated, given the sensitive location adjacent to both a registered battlefield, and a service reservoir?

Question 9 – Are there potential adverse effects not covered above, if so, what are they and how would they be addressed and mitigated? N.B. The Council's response should address key issues raised in representations

- 2.1.15 We consider it expedient to deal with these two questions collectively given the interrelationship between the issues raised. We are pleased to read that the Inspectors have rightly characterised the proposed allocation site as being within a 'sensitive location' in Question 5 with reference to the registered battlefield and the presence of a service reservoir. We would add to this by highlighting the pylons which traverse the centre of the site and also represent a significant constraint that is not present on the Rowland Homes land. Furthermore, we would also draw to the Inspectors' attention a range of other negative factors such as the aforementioned considerable incursion into the Green Belt, and by extension the significant departure from the existing settlement pattern, and the poorer performance of the site in the Sustainability Appraisal compared to the Rowland Homes site.
- 2.1.16 In our previous representations to the Proposed Submission Version of the Local Plan, we provided detailed comments on the Site Assessment Proformas published by the Council at that time which set out the reasoning for selecting the proposed allocation site, and not progressing with the Rowland Homes site. We highlighted several deficiencies within that process, and raised a number of questions relating to the conclusions reached by the Council in making its selection. We do not repeat the content of our earlier representations here, and instead intend to rely upon our previous comments, which remain valid.
- 2.1.17 We have seen no clear or convincing response from the Council in relation to our earlier representations, and in fact the latest Site Profiles published in June 2022 for both the proposed allocations (CD02) and omission sites (CD03) further deepen our concerns in relation to this process insofar as it relates to the proposed allocation site in Winwick.
- 2.1.18 In Table 2.1, below, we provide a summary and comparison of the comments made by the Council in the latest Site Profiles.

Table 2.1 Comparison of Site Profiles for the Proposed Allocation OS6 and Rowland Homes Site

Consideration	Proposed Allocation OS6	Rowland Homes Site	Stantec Comments
Constraints and Designations	<p>Green Belt</p> <p>Within 1km of the M6 AQMA</p> <p>Pylons run through the centre of the site west to east.</p> <p>Contaminated land in north-east corner of the site.</p> <p>United Utilities underground reservoir immediately to south of the site.</p> <p>Registered Historic Battlefield to west of the site.</p> <p>Whole site is Grade 3 Agricultural Land.</p>	<p>Green Belt</p> <p>Grade 3 Agricultural Land</p>	<p>According to the Council's own assessment the proposed allocation site is affected by seven constraints and/or designations.</p> <p>In contrast, the Rowland Homes site is only affected by two constraints and/or designations, both of which are also present in the case of the proposed allocation.</p> <p>Conclusion: The Rowland Homes site is less constrained and preferable vis-à-vis the proposed allocation.</p>
Green Belt Assessment	<p>The site currently makes a moderate contribution to Green Belt purposes.</p> <p>Whilst development of the site would entail a small incursion into undeveloped countryside, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt around Winwick.</p> <p>A new recognisable and permanent Green Belt boundary would be created by strengthening existing boundaries.</p>	<p>The site makes a strong contribution to purpose 1, a moderate contribution to purpose 5, a weak contribution to purpose 2 and no contribution to purposes 1 and 4.</p> <p>Overall assessment: moderate contribution.</p>	<p>The allocation site is judged to make an overall 'moderate' contribution to the five Green Belt purposes.</p> <p>The Rowland land makes 'no contribution' or a 'weak contribution' to three out of the five Green Belt purposes. It only makes a 'strong' contribution to one Green Belt purpose and a 'moderate' contribution to another.</p> <p>Conclusion: The Rowland Homes site makes no greater contribution to the Green Belt than the proposed allocation, and in fact represents less of an incursion into the Green Belt compared to the existing settlement pattern. On that basis the Rowland Homes site is at least the same or even preferable to the proposed allocation in Green Belt terms.</p>

Consideration	Proposed Allocation OS6	Rowland Homes Site	Stantec Comments
Sustainability Appraisal	<p>Will promote sustainable growth for five objectives.</p> <p>Will be unlikely to have a major impact on trends for 15 objectives.</p> <p>May require mitigation for five objectives.</p> <p>Likely to require mitigation for one objective.</p>	<p>Will promote sustainable growth for six objectives.</p> <p>Will be unlikely to have a major impact on trends for 15 objectives.</p> <p>May require mitigation for three objectives.</p> <p>Likely to require mitigation for two objectives.</p>	<p>The Rowland Homes site performs better than the proposed allocation in the Sustainability Appraisal.</p> <p>It will contribute towards six sustainable growth objectives, whereas the proposed allocation contributes to five.</p> <p>Both sites are the same in terms of their impact on trends for 15 objectives.</p> <p>However, the proposed allocation site 'may require' or 'is likely' to require mitigation in relation to six objectives, whereas only five objectives are 'likely to' or 'may require' mitigation in terms of the Rowland Homes site.</p> <p>Conclusion: Overall the Rowland Homes site performs better than the proposed allocation in terms of the Sustainability Appraisal.</p>
Site Assessment Proforma and Conclusions	<p>This site is considered to be suitable and is in a sustainable location.</p> <p>Site is available and free from ownership issues, having been promoted by the site owner.</p> <p>The site has good accessibility to formal play space, and primary and secondary schools.</p> <p>It is available, as it is not in active use and is being promoted by the owner.</p> <p>The site is achievable as it is in an area of moderate viability and there is developer interest and known demand.</p> <p>However, there are some suitability issues due to the</p>	<p>This site is considered to be suitable.</p> <p>There are some suitability issues due to the distance to GP services and local natural greenspace.</p> <p>The site has good accessibility to formal play space, primary and secondary schools and bus services.</p> <p>The site falls within zone 1 (inner protection zone) of the Environment Agency's Groundwater Source Protection Zone and the edge of the historic landfill site 250m buffer zone falls just within the western-most corner of the site.</p>	<p>The remarks made in the Site Assessment Proforma and subsequent conclusions reached raise significant issues of soundness in relation to the selection of the proposed allocation site OS6.</p> <p>Both sites are considered to be suitable, available and viable. Both sites have good accessibility to formal play space and schools. The development of both sites would be in accordance with the objectives set out in the emerging Local Plan.</p> <p>Both sites have similar issues in terms of proximity to GP services and natural greenspace,</p>

Consideration	Proposed Allocation OS6	Rowland Homes Site	Stantec Comments
	<p>distance to GP services and local natural greenspace.</p> <p>There is a small section of potentially contaminated land in the north-eastern corner and a section of historic landfill site buffer zone (250m) in the south-western corner, and therefore, there are known abnormal development costs.</p> <p>The site also falls within Zone 1 (inner protection zone) of the Environment Agency's Groundwater Source Protection Zone.</p> <p>There are also pylons running across the site however these could be avoided given that the site exceeds the housing requirement for Winwick.</p> <p>Although the existing boundary is less durable, a more durable Green Belt boundary could be established.</p> <p>Development of the site would be in accordance with the objectives as set out in the draft Warrington Local Plan.</p>	<p>The site is available, as it was promoted by the owner.</p> <p>The site is considered to be achievable as it is in an area of moderate viability and there is developer interest and known demand.</p> <p>There are no known abnormal development costs.</p> <p>Development of the site would be in accordance with the objectives as set out in the draft Warrington Local Plan.</p> <p>The Council's highways officer considered that the lack of a secondary access point would not be an issue.</p> <p>The site capacity far exceeds the housing requirement for Winwick. There are no potential boundaries which could be used to divide the site into a smaller site which would better accommodate the requirement.</p> <p>As such OS6 is considered a more appropriate site to accommodate Winwick's housing requirement.</p>	<p>and groundwater protection/historic landfill zones.</p> <p>However, by the Council's own admission the proposed allocation site suffers from various constraints such as known contaminated land and abnormal development costs, and the presence of pylons across the site. Neither of these constraints affects the Rowland Homes site.</p> <p>Furthermore, there is no mention in this part of the appraisal of the previously highlighted issues such as the proximity to the registered battlefield, presence of the underground reservoir, and potential impact on the M6 AQMA. Again, none of these constraints apply to the Rowland Homes site.</p> <p>The only reasoning offered by the Council in the final part of its assessment as to why the Rowland Homes site has been omitted is that its theoretical capacity exceeds the requirement for Winick.</p> <p>This is illogical given that (1) the capacity of the Rowland Homes land can be capped to the final requirement for Winwick and in previous submissions we have demonstrated how the site could be developed to deliver the 130 units currently identified (which in any event is expressed as a 'minimum' requirement); and (2) the capacity of the proposed allocation site OS6 also exceeds the identified requirement of c. 130 dwellings for Winwick.</p>

Consideration	Proposed Allocation OS6	Rowland Homes Site	Stantec Comments
			<p>However, the Council bizarrely asserts that due to the pylon constraints the final site capacity will be reduced. The only way this is achieved, as shown in the indicative layout submitted by the promoter of site OS6, is to create a contrived layout whereby the site is split in half with an open corridor running through the centre to accommodate the pylon stand-off area.</p> <p>We would also note in passing that the Rowland Homes site has a very well defined northern hedgerow boundary which can be easily enhanced, whereas the proposed allocation site has a very weak and porous boundary.</p> <p>Conclusion: The Council has proposed the allocation of site OS6 over the Rowland Homes land simply because it suffers from <u>more constraints</u> and therefore has a lower site capacity. This approach is very clearly fundamentally flawed and unsound. The Rowland site has fewer constraints and is demonstrably a more logical and sustainable option to meet the Winwick housing requirement.</p>

2.1.19 Based on the Site Profiles and earlier supporting evidence provided by the Council, there is no doubt that there are serious shortcomings in relation to the assessment criteria, consideration of alternative options, and site selection methodology used to establish the most sustainable housing allocation for Winwick in terms of Green Belt release and all other factors taken in combination. We have not undertaken a detailed examination of the other Site Profiles for all of the other allocation and omission sites, but our findings set out in Table 2.1 cast serious doubt over some of the logic and consistency being applied to the Green Belt Assessment and site selection process.

2.1.20 We also wish to highlight to the Inspectors the very important matter of the proximity of the proposed allocation site to the registered battlefield. The Inspectors will be aware of the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the duty

of Local Authorities to have special regard to the desirability of preserving heritage assets. The National Planning Policy Framework ('NPPF') at paragraph 199 makes clear that *'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation'*, and that *this 'is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'*. Paragraph 200 of the NPPF goes on to state that *'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'*, and that *'Substantial harm to or loss of heritage assets such as a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional'* (our emphases added).

- 2.1.21 We do not consider that the Council has exercised its duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to have 'special regard' to the protection of heritage assets. The proposed allocation site is immediately adjacent to the registered battlefield and will have an impact upon its immediate setting. We acknowledge that the Council has produced a Heritage Impact Assessment, consulted Historic England and expects the development of the proposed allocation site to include mitigation and design measures to limit harm to the setting of the battlefield. However, the Rowland Homes site is a very clear alternative which is not only less constrained physically and environmentally, but will have no impact on the setting or character of the Registered Battlefield. Historic England was not consulted on this potential alternative and in our professional view this is likely to be seen as a favourable site in heritage impact terms.
- 2.1.22 The likely conclusion described above is supported by the enclosed Heritage Assessment, which has been produced by Barton Willmore (now Stantec), and which should be read alongside our Hearing Statement. Below, we summarise some of the headline conclusions from the report:
- The Council's own assessment of significance within the Heritage Impact Assessment and the Sustainability Appraisal does not appear to account for the fact that Registered Battlefields are categorised as *'assets of the highest significance'*, alongside scheduled monuments, protected wreck sites, Grade I and Grade II* listed buildings, Grade I and Grade II* registered parks and gardens, and World Heritage Sites. This is a serious omission in the Sustainability Appraisal methodology.
 - It is unclear how the assessment of *'Unlikely to have a major impact on trends'* (Yellow) has been derived, which, based on the evidence provided, should have at best been assessed as *'Mitigation may be required / unavoidable impacts'* (Amber). The proposed allocation will inevitably lead to the encroachment of development within the immediate setting of the designated heritage asset, thus impacting on its significance.
 - It is unlikely, given the very close proximity of the proposed allocation site to the designated heritage asset, that the harm to its setting and significance can be successfully mitigated through sensitive design, landscape buffers and setting back of built form.
 - Accordingly, the development of the proposed allocation site has the potential to result in material impacts on the setting of the Battle of Winwick Registered Battlefield, causing harm to its heritage significance.
 - In contrast, development at the Rowland Homes site will have no impact on the immediate setting of this heritage asset of the highest significance.
- 2.1.23 On the basis outlined above, and supported by the Barton Willmore Heritage Assessment, the Council does not appear to have given 'great weight' to the conservation of the Registered Battlefield, and no 'clear and convincing justification' has been provided for the selection of a site that will very obviously result in a greater level of harm to a designated heritage asset than a sustainable alternative that comfortably meets all other selection criteria (and indeed out-performs the proposed allocation in a number of areas as demonstrated in Table 2.1).

2.1.24 We therefore consider that the approach to site selection at least in the case of Winwick, and potentially in other areas, is inappropriate, unjustified and unsound. Accordingly, we wish to raise serious issues of soundness in relation to the capacity of the proposed allocation site to deliver the housing requirement in Winwick, and believe that the Rowland Homes site is a much more sustainable and less harmful and constrained option.

Question 14 – Are any main modifications necessary for soundness?

2.1.25 Yes – we consider that proposed allocation OS6 should be replaced by the Rowland Homes site, which is a demonstrably more sustainable alternative. There are serious and significant shortcomings in the site selection and Green Belt Assessment processes that warrant a close re-examination, in particular the conclusions reached that have informed the production of the draft Local Plan. These issues could well permeate through to other areas of the Plan and draw into question overall soundness if similar deficiencies and errors are present elsewhere.

2.1.26 The strong credentials of the Rowland Homes site can be summarised as follows, and are also demonstrated elsewhere in our other Hearing Statements and in earlier representations:

- The site is controlled by Rowland Homes, which has been building high-quality family homes across the North West of England and north Wales for the past three decades (since 1993).
- Rowland Homes has commissioned a suite of documents which demonstrate that the site is sustainably located and free from physical, legal, environmental or ecological constraints that would prevent the site coming forward for housing development in the short term.
- The site is conveniently located in relation to a wide range of community services/facilities and is close to public transport facilities.
- The Environment Agency's online Flood Map for Planning confirms that the site is wholly within Flood Zone 1 – land at a low risk of flooding.
- An initial appraisal by specialist ecologists concludes that there are unlikely to be any ecological constraints that would preclude development at the site.
- Rowland Homes' highways advisor confirms that a scheme of 130 dwellings could comfortably be accommodated at the site via a single vehicular access point, which is sufficient for the scale of development that is envisaged.
- There are not anticipated to be any utilities related constraints that will prevent residential development at the site.
- Overhead power lines to the north and west of the site do not represent a constraint to the site's development, in contrast to the proposed allocation site, which contains pylons and overhead power lines which compromise its capacity and layout.
- The strong locational characteristics of the site and the relative absence of constraints at the Rowland Homes site are recognised in the Council's own Site Assessment Proformas and Site Profile documents, which all confirm that the site is considered suitable, available and deliverable for residential use.
- The Rowland Homes site performs better than the proposed allocation site in the Council's own Sustainability Appraisal.
- There is very limited vegetation at the Rowland Homes site, other than the hedgerow along the northern boundary, and there are no trees within the body of the site. Indeed, the site has a stronger and more durable boundary to the north, which can easily be enhanced to contain development. In contrast, the proposed allocation site has no such durable boundary.
- The Rowland Homes site is not within a conservation area and there are no listed buildings either within or adjacent to the site. Furthermore, a Registered Battlefield is located to the immediate west of the proposed allocation site. There are open views from the proposed allocation site across the 1648 historic battlefield which therefore

represents a heritage constraint to the development of that site. In contrast, there are no views towards or across the historic battlefield from the Rowland Homes site. The proposed allocation site has the potential to impact upon the setting of this heritage asset, whereas the Rowland Homes site is located further away from the Registered Battlefield and will therefore have no impact.

- 2.1.27 If the Inspectors are minded to retain the proposed allocation site, then we consider that the Rowland Homes site should be allocated in addition to this to ensure choice and competition, particularly given the constraints that affect proposed allocation site OS6. We maintain that Winwick is a sustainable settlement and capable of accommodating a higher level of housing growth, particularly given the heavy reliance the Council is placing on large strategic extensions which will take many years to come forward and which will require significant infrastructure to deliver. We have not seen any compelling justification for the 130 dwellings figure or evidence to suggest that a higher number cannot be supported.
- 2.1.28 We consider that the allocation of additional smaller and medium sized sites in the outlying settlements could bolster housing delivery in the short to medium term and alleviate the need for such a significant 'step' in the housing requirement (currently 678 dwellings per annum in years 2021-2025, then rising steeply to 870 dwellings per annum in years 2026-2038).