

# Warrington Borough Council Local Plan Review – Regulation 18 Consultation

Representations on behalf of the High Legh  
Estate

## INTRODUCTION

These representations are made by Fisher German on behalf of the High Legh Estate, in respect of the Warrington Borough Council Regulation 18 Consultation on its Local Plan Review. It has been structured around the questions identified by the Council, but seeks to address only those questions of relevance to the client's interests.

Our client owns land at Cherry Hall Farm, Cherry Lane, Lymm, to the east of the M6 and north of the M56 motorways. The site extends to approximately 37.5 hectares in area and a plan showing the site's boundaries is enclosed with these representations, along with a completed sites registration form in support of the site's formal submission to the call for sites exercise which accompanies the Local Plan Review.

Warrington Borough Council is currently reviewing its Local Plan following the High Court challenge on the housing requirement, and the emerging evidence underpinning the borough's growth needs and economic development ambitions. It is clear through the emerging evidence base that the local planning authority has very challenging housing and employment land requirements targets to deliver.

In accordance with the provisions of the National Planning Policy Framework (NPPF), the Local Plan must ensure that it can deliver the housing and employment needs. Local planning policy as a whole must reflect the most recent evidence base and ensure that there is sufficient flexibility to demonstrate a supply of deliverable housing and employment land, ensuring competition and choice in the market for land.

The role and contribution of the Green Belt is important in this context as well given the extent of the area covered by this designation in Warrington. It is imperative that Warrington Borough Council takes a robust approach to allocating sufficient sites to maintain its housing and employment land supply, to maintain a proactive approach to directing development, including protection of the Green Belt. Given the constraints currently imposed on the authority and the need to meet the full, objectively assessed needs for housing and employment land in the area, we strongly support the review of the Green Belt undertaken, which is the only way in which development needs can be met whilst ensuring that enduring, defensible boundaries can be created and maintained. This fact is acknowledged by the Council in its 'Scope & Contents' consultation document.

In supporting the review, it is however considered that Green Belt boundaries should be drawn to provide for suitable allocations to the settlement which will facilitate the delivery of the Council's housing and employment land requirement. This should be undertaken now as an issue of strategic importance in delivering the Local Plan.

## **WARRINGTON BOROUGH COUNCIL LOCAL PLAN REVIEW REGULATION 18 CONSULTATION**

The representations below focus on the consultation questions of most relevance to land at Cherry Hall Farm.

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

No comment.

### **Question 2: Do you consider the assessment of Housing Needs to be appropriate?**

The Mid-Mersey Strategic Housing Market Assessment (SHMA) identified an Objectively Assessed Need of 839 new homes (to include 220 Affordable units) per year up to 2037, and an additional 62 bed spaces in Care Homes (specialist housing for elder people), per year up to 2037. The SHMA Addendum has considered implications arising from an alternative (increased) job growth for Warrington to the SHMA which gives a revised housing need of 984 dwellings per annum. This increase, the Council contends, will ensure a balance between homes and jobs.

Paragraph 6.21 of the SHMA states that:

*"Whilst it is considered that the demographic-based figures are important in the understanding of OAN, there is clearly a basis to potentially uplift these to ensure that economic growth is not constrained."*

We welcome the recognition in the OAN that market signals, including house price growth and the increasing demand for affordable housing, all indicate that the pressure on the housing market is increasing and shows little sign of relenting.

If this Local Plan is to truly act as a plan for delivering the full objectively assessed housing needs for Warrington Borough, it must embrace the economic potential of the wider Functional Economic Area which includes Wigan, Trafford and Salford in Greater Manchester; Cheshire West and Chester, Cheshire East and both Halton and St Helens in the Liverpool City Region.

If the strategic housing requirement is not set at a pragmatic level its value and weight in creating a plan-led approach would be significantly diminished.

It is therefore clear that the step change in OAN from the Council's previous Local Plan proposals will require a step change in site allocations and delivery. The Council must put in place policies and proposals which respond positively and which direct growth to the most sustainable locations. If these proposals are put in place through this Local Plan, they stand a chance of starting to deliver the housing needs through a plan-led approach.

The SHMA Addendum states that the 984-dwelling requirement has been calculated to assist the Council in their initial consultation on the review of their Local Plan. It adds that a more comprehensive update of the SHMA will be required in due course to reflect more recent population and household projections which have been released following publication of the 2016 SHMA. Clarification of the process going forward is required, particularly as the Council looks to align its housing need with jobs growth and undertake its proposed process of spatial distribution and site assessment. The consequential impacts on job numbers and employment land requirements should also be clearly set out.

### **Question 3: Do you consider the assessment of Employment Land Needs to be appropriate?**

We strongly encourage the local planning authority to ensure that the location, quantity and type of economic development proposed within the Local Plan Review is:

- consistent with and supportive of economic growth aspirations of the LEP; and
- not in competition with established employment locations.

This will help to ensure a robust and evidenced approach to addressing the challenges facing employment within the Functional Economic Area which includes Warrington Borough.

The NPPF states that the planning system should ensure that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. It adds that local plan strategies for housing, employment and other uses should be integrated, taking full account of relevant market and economic signals.

The assessment of employment land requirements undertaken through the Economic Development Needs Assessment (EDNA) has identified an OAN figure of 381 hectares of employment land over the next 21 years. This is based on the strategic/local take up model which is stated to best account for the full range of need across the Borough. Once the existing realistic supply assumption is included, the shortfall reduces to 276 hectares. Most of this need – 165 hectares – is for B8 use class.

The EDNA makes references to the Devolution Bid and work by the Cheshire and Warrington Local Economic Partnership (LEP). The Devolution Bid Sensitivity Test sets out an agenda for growth and the report adds that Warrington should consider this as aspiration even if it does not proceed as envisioned. It is not clear how this has been factored into the overall employment land needs. The review of economic forecasts and housing numbers report also refers to the Northern Powerhouse policy trend, but seems to dismiss the forecasts because they are significantly higher than other trend-based forecasts, there is no apportionment between local authority and the chance likelihood that most predicated growth will be beyond the 2037 reference period of the Local Plan because:

*“...momentum in economic growth is achieved later and only once significant investment in infrastructure has been undertaken.”*

It is important that the aspirations of the LEP are reflected in and consistent with the policies and proposals in the Local Plan Review. This is entirely logical and necessary to ensure that Government funding for infrastructure and growth directed through the LEP Growth Deal is focussed effectively. The role of the LEP and the relationship with the local planning authority in its plan-making function is addressed in the PPG (Paragraph: 006 Reference ID: 9-006-20140306):

*“Local Enterprise Partnerships have a key role to play in delivering local growth by directing strategic regeneration funds and in providing economic leadership through their Strategic Economic Plans. The commitment of local planning authorities to work collaboratively with Local Enterprise Partnerships across their area will be vital for the successful delivery of policies for strategic growth in their Local Plans. An effective policy framework for strategic planning matters, including joint or aligned planning policies, will be a fundamental requirement for this.”*

As concluded in the EDNA the prospects for future economic growth in Warrington are such that the pressure on the housing market from job growth is only likely to increase further.

**Question 4: Do you consider the alignment of Housing Needs and Jobs Growth to be appropriate?**

The NPPF (paragraph 19) highlights the important role that the planning system should play in supporting sustainable economic growth. Later the NPPF (paragraph 158) emphasises the need for the assessments of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market signals. PPG expands upon this point, further emphasising the importance of adjusting the demographically derived housing forecast in response to economic growth projections and objectives to avoid unsustainable commuting patterns.

There must be a correlation between economic growth forecasts and targets with the proposed scale of housing growth. Providing insufficient housing will result in either the failure of the economic growth objective or unsustainable commuting patterns. Failing to provide sufficient housing to achieve the economic growth targets of Warrington will harm the Council's ability to deliver its (and the Local Economic Partnership's) adopted economic growth aspirations.

The correlation between jobs and homes is particularly important in an authority area where there is such a strong relationship with adjacent economic growth centres such as Greater Manchester.

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

The challenges associated to the supply and delivery of previously developed land in Warrington, namely finding enough land to meet objectively assessed needs, the risk of harming the character of the city's urban areas through over-intensification and the difficulty of delivering development in the areas of greatest need.

If an allowance is included within the Local Plan Review for further urban development, it will be necessary to found this on very clear and robust evidence of land availability, achievability, suitability and, very importantly, viability. In compiling this evidence, a very cautious approach should be taken to land supply from this source to reflect the risks often inherent in delivering housing on previously developed land.

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

We support the principle of undertaking a Green Belt review to identify additional allocations to be made across the local planning authority area.

The review of the Green Belt must look to release those sites which are considered most suitable, having regard both to the five purposes of the Green Belt as set out in paragraph 80 of the NPPF:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Given the challenging circumstances faced by Wirral Council, as set out in detail in these representations, it is vital that further land is released from the Green Belt to meet the development needs now and in the future (including for the next Plan period).

The Scope and Contents consultation document acknowledge that there is not the capacity across the local planning authority to meet the full objectively assessed need for housing and the needs for land for economic development on non-Green Belt land without causing significant harm to other planning objectives.

In terms of identifying suitable sites, it is considered that the land at Cherry Hall Farm, Cherry Lane, Lymm represents a logical and deliverable option for mixed use employment and housing. Figure 1 below shows the site in its context.



**Figure 1 – Cherry Hall Farm, High Legh. Source: Google Earth.**

Detailed justification for the site is set out below, where we have assessed the site against the requirements of the site assessment methodology contained in the 2015 Strategic Housing Land Availability Assessment (SHLAA) methodology scoring.

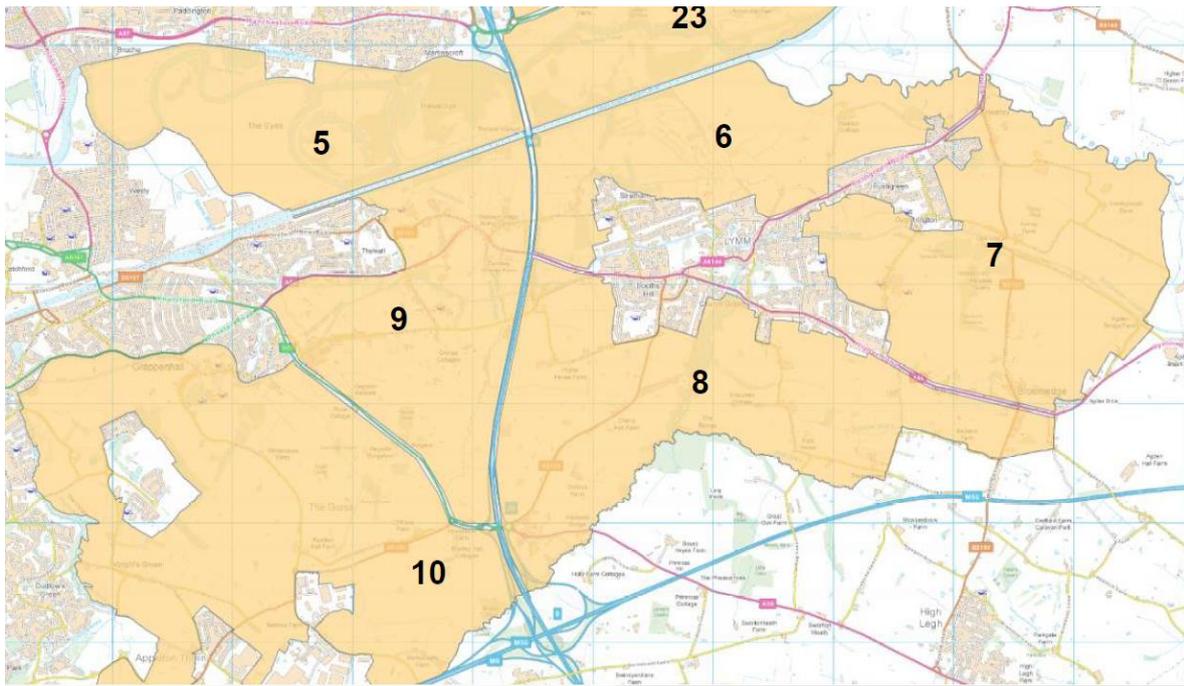
Assessment Criteria	Response
<p><b>Site Suitability</b></p> <ul style="list-style-type: none"> <li>• Allocated or committed employment land</li> <li>• Extant consent for employment development</li> </ul>	<p>The site is not currently allocated for development, but is a site which could be brought forward as a mixed-use employment and residential development through the Local Plan Review. The development of the site will not result in the loss of existing employment land.</p>

<ul style="list-style-type: none"> <li>• Contaminated land and ground conditions</li> <li>• Flood risk</li> <li>• Accessibility</li> <li>• Amenity</li> <li>• Open space</li> <li>• Infrastructure</li> <li>• Landscape</li> <li>• Nature conservation</li> <li>• Heritage</li> <li>• Pollution</li> <li>• Hazardous risks</li> </ul>	<p>The site is located east of Cherry Lane, approximately 0.7 km south of Lymm. Adjacent to the northern boundary is residential development along The Avenue. Woodland and Bradley Brook adjoins the eastern boundary. To the south of the site is Oxheys Farm and agricultural land.</p> <p>The site comprises agricultural land with some farm buildings at Cherry Hall. Warrington Council's online mapping shows the site comprises Grade 3 quality agricultural land.</p> <p>It is well located in relation to the infrastructure network, easily accessed from the M6 and M56 motorways which lie to the south and south west of the site. This would serve employment (commercial) uses particularly well as they can access the motorway service more directly. Regarding local accessibility, the site is located along Cherry Lane and could connect with the existing footpath which begins at The Tannery to the north of the site. The footpath extends north along the side of Cherry Lane into Lymm and provides access to the services and facilities of the town including bus services to Warrington and beyond.</p> <p>There are no physical or environmental constraints affecting this site. Its development would not result in the loss of all or part of a designated site of nature conservation interest. The site has hedgerows on the south, west and northern boundaries. Trees and Hedgerow surrounding the site would be enhanced and strengthened as part of the development proposals. Hedgerow retention and soft landscaping would soften views of the site along Cherry lane.</p> <p>Development of the site would not result in the loss of a community facility, existing recreational open space or related designations. The development could facilitate additional onsite open space provision.</p> <p>Its development not result in the loss of a historic site. The site does not impact a Listed Building, Conservation Area, Scheduled Ancient Monument or Historic Park and Gardens. The nearest asset is north of the site, beyond the boundary and east of the houses along The Avenue, where the Grade II listed Bridge is located. There is also a Scheduled Monument at The Tannery on the opposite side of Cherry Lane north of the site, opposite houses at The Avenue.</p> <p>The site is outside of Flood Zones 2 and 3 in accordance with the Environmental Agency Flood Risk Map for Planning, therefore it is at low risk of flooding.</p> <p>There are no known environmental health and safety issues that would affect would be occupiers and neighbouring areas. The existing and previous land uses have been agricultural and hence there is little prospect of there being any unexpected issues relating to the ground conditions. The Council's online mapping shows the southern half of the site has a buffer zone</p>
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	<p>extending east-west through the site, for the Essar Oil (UK) Ltd Stanlow-Carington pipeline. Any proposals would therefore be consulted upon with the relevant bodies.</p> <p>Other than the Green Belt designation, the site is not subject to any restrictive local or national designations.</p>
<p><b>Site Availability</b></p> <ul style="list-style-type: none"> <li>• Whether the site is in active use</li> <li>• Whether the site could be developed now</li> <li>• Whether the site was free of ownership and tenancy issues</li> </ul>	<p>There are no identified issues with the current site use delaying development coming forward. There are no legal constraints affecting delivery of the site and no off-site land is required to bring forward the development. The site is therefore considered to be available in the short to medium term as an appropriate development which could deliver much needed employment land along with housing in an accessible location to the motorways, and facilities and services at Lymm.</p>
<p><b>Site Achievability</b></p> <ul style="list-style-type: none"> <li>• 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 and in particular that development of the site is viable.</li> <li>• To be considered developable, sites should be in a suitable location for development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.</li> </ul>	<p>Employment and housing provision within the site would be delivered in accordance with the most up to date objectively assessed needs set out in the Economic Development Needs Assessment and Strategic Housing Market Assessment. The site will therefore increase the employment land offer and both the range and affordability of housing.</p> <p>The site would generate additional job creation through the construction phase and subsequent occupation by companies.</p> <p>The site is clear of pylons and strategic sewers. Reference was made in this table to the oil pipeline consultation buffer zone. There are no major obstacles to the delivery of the development and the site is not known to require remediation or decontamination prior to the construction stage.</p> <p>The site will deliver the infrastructure required to support the development. Contributions would be made to infrastructure provision as sought by the Local Planning Authority in line with relevant policies.</p> <p>There is clearly a need for suitable, available and deliverable sites to come forward from the Green Belt. The Council's own consultation document for its Local Plan Review states that sufficient Green Belt land will need to be released to deliver approximately 5,000 homes and 261 hectares of employment land over the next 20 years. Development at Cherry Hall Farm is well-located in relation to the Council's own evidence on employment land needs.</p> <p>The Warrington EDNA contains in Table ES2 the locational land needs for B-class employment uses. Regarding B8 storage and warehouse use, most logistics in Warrington is 100 percent road related and immediate motorway access is essential for any site looking to replicate the success of Omega and compete</p>

	<p>with other emerging motorway linked schemes elsewhere in the North West.</p> <p>in terms of strategic demand stakeholders who were consulted in the evidence gathering for the report showed strong support for the provision of a new strategic site(s) along the M56 Corridor. Although this would likely require some Green Belt release the advantages include a greater body of potentially available land; links to the crucial Manchester-North Wales Corridor; the ability to build on the existing logistics bases in this area and the ability to provide greater employment opportunities in the south of the Borough.</p> <p>The EDNA adds that employment land supply is modest across the Borough and particularly in South Warrington where demand outweighs supply. Development in this location is key to unlocking further opportunities, for both industrial and office occupiers, in the future.</p> <p>More industrial space is required in South Warrington an area for which the receive regular enquiries but are unable to satisfy. It is felt that the current Stretton supply is too small and not fit for purpose.</p> <p>Those consulted as part of the report preparation generally wanted to see a strategic B2/B8 development on the M56 Corridor which would open further Chester, South Liverpool and South Manchester markets. Such a scheme would have good motorway access and a reasonable link to Manchester Airport. In transport terms, the ability to avoid the frequently congested Thelwall Viaduct would be desirable.</p> <p>The EDNA concludes that given the scale of requirement it is assumed that most of the B8 strategic employment land needs will not be met though infill development, but rather through new large allocations in East and South Warrington, as discussed above. As with strategic need, the local needs requirement is for large flexible sites which link to the strategic road network and are in locations which can support increased HGV traffic. Locations must also have the flexibility to support mixed B2/B8 uses.</p> <p>The above market analysis contained in the EDNA strongly supports new employment development in the south of Warrington Borough, in a location with good access to the M6 and M56 motorways. The site at Cherry Hall Farm could contribute to this important market need in a location suitable for development for the reasons outlined in this assessment.</p>
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As stated above, the site currently falls in the Green Belt and a wider parcel of land which comprises this site has been assessed in the Green Belt Assessment Final Report (Arup, October 2016). General Area 8 which includes Cherry Hall Farm was found to have a 'strong' contribution overall to the Green Belt purposes.



**Figure 2 – General Area Assessment Parcels. Cherry Hall Farm is in Parcel 8. Source: Green Belt Assessment Final Report, Arup.**

Some of the Green Belt parcels are large and it is not clear how the parcels have been identified in terms of their boundaries and features. Furthermore, the stage two assessment then proceeds to assess certain parts of the parcel, without taking into consideration whether other parts of the parcel could contribute in lesser terms and may make little or no contribution to the Green Belt purposes. Were such parcels reduced or sub-divided overall, the results may be significantly different in terms of their contribution towards the Green Belt purposes.

We disagree with several of the overall conclusions in Table E1 of the Assessment report. Regarding Green Belt purpose 2 – to prevent neighbouring towns merging into one another – we fail to see how the parcel overall makes a ‘moderate’ contribution to preventing merging of towns, when parcel 5 to the north west was deemed to have a ‘weak’ contribution which would not result in the merging of towns. In applying this methodology, given the defensible boundaries with roads and woodland areas (particularly in the southern section of parcel 8), then surely parcel 8 should also have a ‘weak’ contribution to the preventing of towns merging.

The conclusions for parcel 8 overall rightly acknowledge there are strong boundaries for this parcel, with woodland areas and the M6 motorway. Yet the assessment in relation to purpose 3 – to assist in safeguarding the countryside from encroachment – considers the boundaries to be less durable and defensible. The inconsistency in seeking to conclude overall for this large parcel, which changes in nature from its eastern end to western end, is concerning.

Finally, the assessment methodology is flawed because regarding the EDNA evidence and proposed ‘next steps’ in determining housing/jobs needs and Green Belt releases, there are parcels of land in the General Assessment which have not been assessed further in the Parcel Assessment stage. For example, land at Cherry Hall Farm has been excluded from the Parcel Assessment and has been deemed to perform strongly in Green Belt purposes at the first stage without any further assessment. The facts that this area has not been assessed further raises

concerns about the overall approach; for example, Cherry Hall Farm would not contribute towards the prevention of merging Warrington and Lymm and has strongly defined boundaries particularly along the eastern edge with the woodland area. Similarly, Cherry Hall Farm does not contribute to the setting and character of historic Lymm town, despite parcel 8 deemed to have a 'strong' contribution overall in this regard.

This is particularly concerning when evidence in the EDNA from stakeholders strongly supports employment-related development in the southern area of Warrington in locations such as Cherry Hall Farm which could contribute to the employment land needs coming forward through Green Belt releases. The Local Plan Review must release Green Belt sites to meet employment and housing needs; a fact acknowledged in paragraph 2.20 of the Scope & Contents document which forms this consultation. If the local planning authority's assessment processes are not robust in reviewing all Green Belt parcels to meet the significant land requirements, then this risks undermining the soundness of the Local Plan Review overall.

We strongly urge the local planning authority to review its Green Belt Assessment review and methodology applied, particularly its approach which has excluded certain areas from the more detailed Parcel Assessment. The boundary areas for parcel 8 should also be reviewed because the conclusions are not consistent both within the parcel assessment (i.e. the conclusions for each of the five Green belt purposes, then the overall conclusion) and also when compared with conclusions for other nearby parcels.

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

No comment.

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

Given the challenging circumstances faced by Warrington Borough, as set out in detail above, it is vital that further land is released from the Green Belt to meet the development needs now and in the future (including for the next Plan period). The NPPF is clear that Green Belt reviews should ensure that boundaries can endure beyond the plan period, so the identification of safeguarded land must also be considered at this stage.

The review of the Green Belt must look to release those sites which are considered most suitable, having regard both to the five purposes of the Green Belt, and to the suitability of each site for employment and residential development. This should be determined having regard to the established principles of sustainable development established in national policy. Once sufficient sites have been identified to meet anticipated needs in the current plan period, taking a realistic approach to the likely level of delivery from the strategic sites further land should also be identified for safeguarding. The identification of such sites must take the same approach as for employment and housing allocations in the current plan period.

**Question 9: Do you consider it appropriate to include Minerals and Waste and Gypsy and Traveller needs in the scope of the proposed Local Plan review?**

No comment.

**Question 10: Do you consider the Sustainability Appraisal Scoping Report to be appropriate?**

No comment.

**Question 11: Do you consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be appropriate?**

The proposed site assessment process raises concern about the soundness of this sequential approach. The focus of this concern is the approach to Green Belt and the weight that should be placed upon the protection of Green Belt in a plan-making context compared to the delivery of sustainable development.

The NPPF sets out the proposed approach to Green Belt and relevant passages are included below for information:

*“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.” (Paragraph 83, NPPF)*

*“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.” (Paragraph 84, NPPF)*

*“When defining boundaries, local planning authorities should:*

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- Not include land which it is unnecessary to keep permanently open;*
- Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” (Paragraph 85, NPPF)*

There is a two-stage process outlined in these policy extracts for Green Belt sites release. Firstly, to test whether there are exceptional circumstances which warrant a review of the Green Belt (paragraph 83). If they exist then the local planning authority should undertake to review the Green Belt boundary, considering of the need to promote sustainable development (paragraph 84). This is the second test.

Regarding the first test, the local planning authority has stated in its 'Scope & Contents' document that:

*“If Warrington is to meet its development needs, then based on the updated assessment of urban capacity, sufficient Green Belt land will need to be released to deliver approximately 5,000 homes and 2611 hectares of employment land over the next 20 years.”* (Paragraph 20).

The provision of a considerable boost to housing delivery in Warrington Borough in a sustainable manner satisfies the exceptional circumstances test.

The fact that non-Green Belt options existed should not prevent the local planning authority from concluding that the exceptional circumstances test had been satisfied.

Having satisfied the exceptional circumstances test, a planning judgement is required to determine the most sustainable location(s) to meet the housing need. Paragraph 84 in the NPPF clearly states that changes to the Green Belt *“should take account of the need to promote sustainable patterns of development”* and sets out the evidence needed to make this judgement.

The sequential approach proposed in Appendix 2, however, suggests that land would only be removed from the Green Belt if it was deemed that no other ‘sustainable’ sites were available. Appendix 2 asks if sufficient additional capacity has been identified within the existing urban area and greenfield sites outside of the Green Belt to meet development needs. This approach presupposes that there is a threshold over which a site can be defined as ‘sustainable’. For example, a site on the edge of a settlement with a smaller number of services and facilities, moderate landscape impacts but outside of the Green Belt could be allocated for housing or employment in preference to a highly accessible and sustainable site with low landscape impact near to Warrington and Lymm. The latter would be considerably more sustainable in planning terms but its allocation not even considered simply because of the Green Belt designation.

Whereas in the plan-making it is the relative sustainability of sites which is important. This suggests a flawed approach in seeking to apply an absolute concept of sustainability to the ‘plan-making’ process.

We recommend that the local planning authority should adopt a relative interpretation of sustainability and reflect this in the methodology for its site assessments and spatial distribution of development.

Finally, we consider that new employment land within the Local Plan Review should be directed toward two categories of location.

The first of these categories is locations near existing concentrations of employment land. There are clear benefits to directing new development toward locations where there is already the infrastructure and services in place to support employment development.

The second of these categories is as part of major new mixed use developments, such as the proposed strategic locations identified within the Spatial Scenarios. The co-location of new employment and residential development has multiple benefits including enabling more sustainable patterns of commuting and achieving economies of scale with regards to infrastructure costs.

The Local Plan Review must therefore consider the opportunities to integrate employment land alongside existing and proposed residential development, as well as in areas already well served by infrastructure. This will help to ensure more sustainable patterns of movement, thus reducing the need to travel and helping to address environmental, transport and wellbeing challenges.

**Question 12: Do you agree with the assessment of Local Plan Policies at Appendix 1?**

No comment.

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

No comment.

**Question 14: Having read this document, is there anything else you feel we should include within the 'Preferred Option' consultation draft, which you will be able to comment on at the next stage of consultation?**

No comment.