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Warrington Borough Council

Local Plan Review

Regulation 18 Consultation: Standard Response Form

October 2016

Contents

1: Contact Details **Page 2**

2: Questions **Page 3**

3: Responses **Page 5**

1: Contact Details (Compulsory)

Title:

First Name:

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Organisation (if applicable):

Address:

Phone Number:

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2: Questions

Question 1

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

Question 2

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

Question 3

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

Question 4

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

Question 5

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

Question 6

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

Question 7

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

Question 8

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

Question 9

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

Question 10

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

Question 11

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

Question 12

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

Question 13

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

Question 14

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

3: Responses

Question 1

Question 2

Question 3

Question 4

Question 5

Question 6

Question 7

Question 8

Question 9

Question 10

Question 11

Question 12

Question 13

Question 14

Warrington Local Plan Review

Response to Regulation 18 Consultation

On behalf of Nicholas D Parker

December 2016

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Introduction

We wish to make the following representations on the consultation documents, on behalf of our client, Nicholas D Parker, who's family owns land at Cherry Lane Farm in Lymm.

Response to Consultation Questions

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

On behalf of our client, we welcome the Green Belt Assessment and the recognition throughout the consultation documents that significant Green Belt release will be required across the Borough will need to accommodate future growth. We also appreciate that there will also be a need for a degree of professional judgement in the assessment of specific areas of Green Belt. We are concerned however, that in some instances, the conclusions reached by the Green Belt Assessment (October 2016) (GBA) prepared by Arup appear fundamentally unjustified and inconsistent.

Our comments are specifically with reference to the assessment of Green Belt around Lymm.

General Areas of Assessment

The GBA identifies three 'General Areas' (GA's) of Green Belt around Lymm – GA 6 to the north of the settlement, GA 7 to the east and GA 8 to the south.

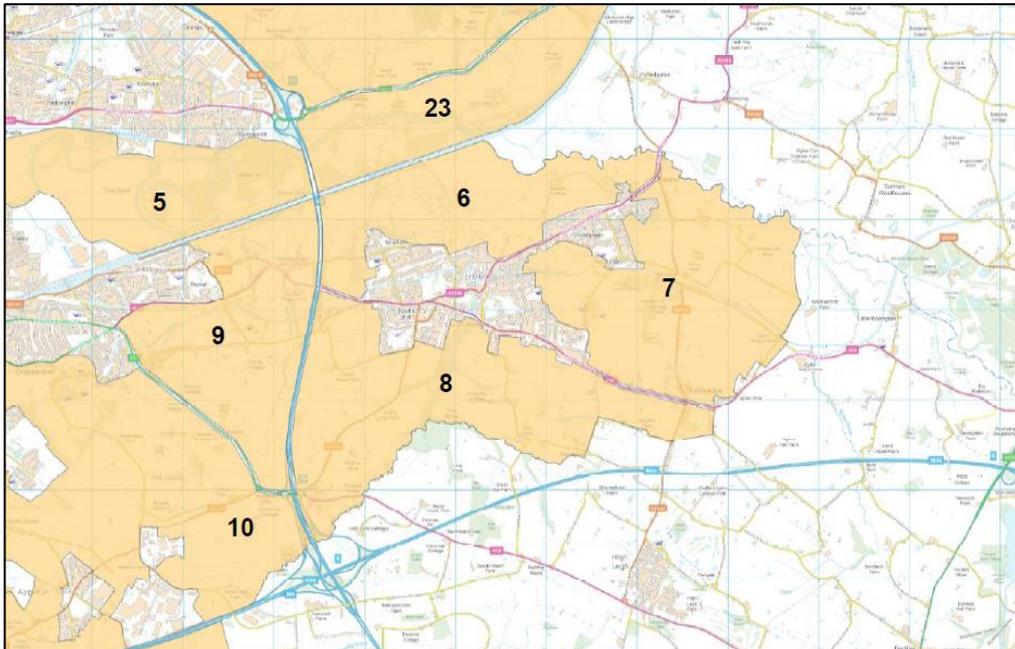


Figure 1: Extract from GBA - General Areas around Lymm

In Appendix E of the Green Belt Assessment, these three areas are assessed against the five purposes of Green Belt as follows:

	Purpose 1: To check unrestricted sprawl of large built-up areas	Purpose 2: To prevent neighbouring towns merging into one another	Purpose 3: To assist in safeguarding the countryside from encroachment	Purpose 4: To preserve the setting and special character of historic towns	Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Overall Assessment
GA 6	No Contribution	Moderate Contribution	Strong Contribution	Moderate Contribution	Moderate Contribution	Moderate Contribution
GA 7	No Contribution	No Contribution	Strong Contribution	No Contribution	Moderate Contribution	Moderate Contribution
GA 8	No Contribution	Moderate Contribution	Strong Contribution	Strong Contribution	Moderate Contribution	Strong Contribution

GA 6 is therefore assessed as having a ‘moderate’ contribution to purpose 2 (preventing towns merging). In considering this purpose however, the GBA (Appendix E) states that GA 6:

*“...forms a largely essential gap between the Warrington urban area and Lymm whereby development of the GA would reduce the gap between the towns but would not result in them merging. Furthermore, the M6 ensures that the separation is retained. Overall, the GA makes a **weak** contribution to preventing towns from merging.” [our emphasis]*

It appears therefore that GA 6 has been assessed as having a ‘moderate’ contribution in error.

This is supported by the text under ‘Justification for Assessment’ for GA 6 which goes on to summarise that;

*“The GA makes a strong contribution to one purpose... [purpose 3 as indicated]..., a moderate contribution to two...[purpose 4 and 5 as indicated]..., a **weak contribution to one** and no contribution to each other...[purpose 1 as indicated].” [our emphasis and brackets]*

It seems reasonable to infer that the ‘weak’ contribution described relates to purpose 2 which has accordingly been indicated to have a ‘moderate’ contribution by mistake.

Assuming this is indeed a mistake, it is considered that GA 8 (to the south of Lymm) must also be assessed as making a ‘weak’ contribution to Purpose 2 given the assessment made in relation to GA 8 is almost identical to the word as the assessment for GA 6. The assessment of the contribution of GA 8 to Purpose 2 is as follows:

“The GA forms a largely essential gap between the Warrington Urban Area and Lymm whereby development would significantly reduce the actual distance between the towns without resulting in them merging. The M6 ensures that the separation is retained. Overall, the GA makes a moderate contribution to preventing towns from merging.”

It would be wholly inconsistent for the GBA to be contending that GA 8 has a greater contribution towards preventing merging with Warrington than GA 6 given the similarity of the two General Areas in terms of proximity to Warrington and separation from it by the M6. The General Areas are the same distance from the closest part of Warrington to the west. GA 6 is approximately 1.5 km away from Warrington to

the north east whereas GA 8 is around 3.5 km away to the south west and therefore arguably has less of a role in preventing merging.

Given the above analysis, it is considered that the GBA should be amended to correct this apparent error and assess both GA 6 and GA 8 as making a 'weak' contribution towards Purpose 2.

Amending this flaw is important as it would reveal that GA 8 is only assessed as having a greater contribution (ie. a 'strong' contribution) than GA 6 in relation to Purpose 4 (preserving historic towns). In summarising the assessment of GA 8, the GBA acknowledges that this assessment of 'strong' contribution against Purpose 4 *'is not significant enough to mean that the GA makes a strong overall contribution'*.

Considering the above points, it is inaccurate and unjustified to assess GA 8 as having an overall 'strong' contribution to the purposes of the Green Belt or certainly to imply it makes a more important contribution than the other two GA's in Lymm. The identified flaws and inconsistencies in Appendix E are especially concerning when it leads the GBA to identify GA 8 as one of the top 5 most important of the total 25 'General Areas' assessed in the whole Borough in terms of contributing to the purposes of the Green Belt (paragraph 147, GBA).

In summary, the logic and conclusions drawn about the three GA parcels around Lymm are considered to be fundamentally flawed in the following key ways:

- The assessment of GA 6 as having a 'moderate' contribution to purpose 2 appears to be an error with the intention of the author to in fact conclude a 'weak' contribution;
- Whether 'moderate' or 'weak', it would be inconsistent and unjustified for the GBA to conclude GA 8 has a greater contribution towards purpose 2 than GA 6 considering GA 6 is actually closer to Warrington;
- Given both GA 6 and GA 8 can only reasonably be assessed as having the same level of contribution to Purpose 2, the only purpose against which these two GA's differ is Purpose 4 (contribution to historic towns). The GBA however, acknowledges that the assessment of GA 8 as having a 'strong' contribution to Purpose 4 is not sufficient to warrant an overall conclusion of 'strong' contribution to purposes of the Green Belt. Accordingly, it is submitted that the overall assessment of GA 8 should be re-visited.



Assessment of Parcels

The GBA then goes on to assess parcels within these General Areas. Our client’s land at Cherry Lane Farm is identified as a discrete parcel – Parcel LY25 as identified on the extract below:

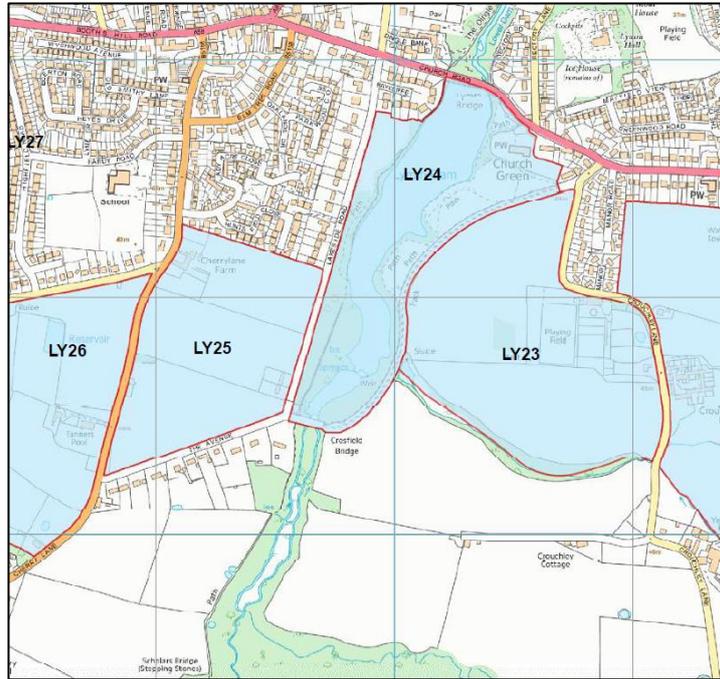


Figure 2: Extract from GBA - Parcel LY25 (land at Cherry Lane Farm)

Parcel LY25 is assessed as making the following contribution to the purposes of the Green Belt in Appendix G:

Table 2: Assessment against Purpose 3 – safeguarding the countryside from encroachment

	Purpose 1: To check unrestricted sprawl of large built-up areas	Purpose 2: To prevent neighbouring towns merging into one another	Purpose 3: To assist in safeguarding the countryside from encroachment	Purpose 4: To preserve the setting and special character of historic towns	Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Overall Assessment
LY25	No Contribution	No Contribution	Strong Contribution	Strong Contribution	Moderate Contribution	Strong Contribution

We now set out our concerns relating to the assessment of this parcel.

Assessment against Purpose 3 – safeguarding the countryside from encroachment

Having reviewed the methodology set out in Section 4 of the GBA, and the conclusions reached in respect of other parcels in Lymm, the assessment of Parcel LY25 as having a ‘strong’ contribution against Purpose 3 (safeguarding from encroachment) seems unjustified and inconsistent.

The GBA states that “*the parcel is well connected to the countryside along three sides*” but offers no reasoning for this conclusion. This is particularly unclear when in the next sentence the assessment

recognises that “*the Avenue, Cherry Lane and Lakeside Road form durable boundaries which would be able to prevent further encroachment beyond the parcel if the parcel was developed*”.

With regard to the methodology set out in Section 4, we consider that in fact Parcel LY25 cannot be assessed as making a strong contribution to safeguarding the countryside from encroachment. A summary of the assessment criteria set out in the GBA methodology, and our critique of the assessment undertaken against each criteria is provided below:

Table 3: Critique of Assessment of Parcel LY25 against Purpose 3

Key Questions to Consider	Critique of Assessment
<p>a. <i>Future encroachment: Are there existing durable boundaries which would contain any future development and prevent development and prevent encroachment in the long term?</i></p>	<p>In Appendix G the GBA considers the existing residential properties along the northern boundary of the Parcel LY25 does not constitute a ‘durable’ boundary and would not be able to prevent encroachment into the parcel. We would question the assessment of this boundary as ‘not durable’ given the borders of these properties form a continuous, solid line along this boundary which is well defined by a 15 metre buffer of mature landscaping.</p> <p>In terms of preventing future encroachment if Parcel LY25 were developed, the GBA acknowledges the existence of durable boundaries around the remaining three sides of the parcel in the form of Cherry Lane, The Avenue and Lakeside Road. We note that the permanence of these boundaries is further reinforced by the existence of Lymm Dam and the surrounding protected woodland immediately to the east of the parcel and the row of dwellings on the south side of The Avenue which further contain the parcel to the south.</p> <p>Overall, it is clear the site represents a well contained parcel of land which is clearly defined by strong, defensible boundaries on all sides which would contain encroachment in the long term if the parcel were developed.</p>
<p>b. <i>Existing encroachment: What is the existing land use/ uses? Is there any existing built form within or adjacent to the parcel?</i></p>	<p>The GBA correctly identifies that Parcel LY25 currently comprises agricultural land with limited built development.</p> <p>However, the methodology also requires consideration of existing built form adjacent to the parcel. It is therefore an important consideration that the entire northern and southern boundaries of the parcel are directly adjacent to existing residential properties. The GBA seems to conclude that the presence of the dwellings along the southern boundary (along</p>

	<p>The Avenue) mean the parcel plays a <i>more</i> important role in preventing encroachment. However, this is illogical when these properties in fact contain the southern boundary of the site and prevent any future encroachment should the parcel be developed.</p> <p>The existing residential properties of Tanners Pool to the west of Cherry Lane in the southern area of the site, and the two existing properties within the south-eastern part of the site also interrupts the feeling of open countryside surrounding the site.</p>
<p>c. <i>Connection to the countryside: Is the parcel well connected to the countryside? Does the parcel protect the openness of the countryside?</i></p>	<p>As described above, the site is surrounded by man-made defensible boundaries on all sides - existing development to the north, Cherry Lane to the west, The Avenue to the south and Lakeside Road to the east. It is well related to the existing built-up area to the north and north west, a continuous line of development to the south and scattered existing properties to the east fronting Cherry Lane and west fronting Lakeside Road.</p> <p>We therefore dispute the assertion in Appendix G of the GBA that the site is “<i>well connected to the countryside along three sides</i>” and question the logic for this. There is in fact extremely limited connectivity between the site and the wider countryside both to the east (by virtue of Lymm Dam and the surrounding dense woodland) and to the south (by the existing properties along The Avenue). Whilst there are some views of the parcel from the agricultural land to the west, the parcel is physically and functionally severed from the wider countryside by Cherry Lane which is a well-used main road being the only route for traffic between Lymm and the M6/M56.</p> <p>For the above reasons, we contend that Parcel LY25 should not be assessed as being well connected to the countryside. Aside from the immediate impact from the loss of the fields (a degree of which will be inevitable to meet Warrington’s needs), its development would not harm the openness of wider green belt in the area given the limited inter-visibility between the countryside and the parcel and the existing urban influences on all sides.</p>



<p>d. <i>Does the parcel serve a beneficial use of the Green Belt (NPPF para 81) which should be safeguarded?</i></p>	<p>Parcel LY25 does not serve a beneficial use of the Green Belt.</p>
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The GBA judges Parcel LY25 as having a ‘strong’ contribution towards Purpose 3. However, with regard to the points set out above, our client considers that this is a flawed analysis. It is also inconsistent when considering the assessments undertaken in relation to other sites in Lymm. For example, parcel LY23 comprising land on the eastern side of Lymm Dam, partly occupied by the football club, is judged to make a ‘moderate’ contribution towards purpose 3 despite the following analysis which could just as easily apply to Parcel LY25:

“The parcel supports long line views...and overall supports a strong degree of openness. The parcel could be argued to make strong contribution due to its openness, but the durability of its boundaries means that overall it makes a moderate contribution to safeguarding from encroachment.”

The overall judgement that Parcel LY23 makes only a ‘moderate’ contribution to purpose 3 is even more inconsistent when it is considered this parcel also supports a beneficial use in the Green Belt. The Lymm Rugby/ Football/ Squash Club has an important recreational and social function in the community and in accordance with the GBA methodology, Parcel LY23 should be judged as having a greater contribution to purpose 3 due to this use.

Assessment against Purpose 4 – To preserve the setting and special character of Historic Towns

Parcel LY25 is also assessed as making a ‘strong’ contribution towards Purpose 4 of the Green Belt. We understand from a review of the methodology that this assessment is given on that basis that the site lies adjacent to the Lymm Conservation Area to the east, and within the 250 metre buffer from the Conservation Area.

We appreciate that it is not within the scope of the Green Belt Assessment to undertake a more sophisticated assessment of the potential impact of development on heritage assets within the Borough. However, we take this opportunity to note that whilst Parcel LY25 is adjacent to the Lymm Conservation Area, there is limited inter-visibility between this heritage asset and the parcel given the dense woodland which surrounds the Dam and would screen the fields at Cherry Lane Farm from the majority of public vantage points in the Conservation Area.

As such, the site in fact makes little contribution towards the wider setting of the Conservation Area. Any proposals for residential development on the site would be designed to respect the character of the Conservation Area, through areas of open space and new landscape buffers in the eastern part of the site. In light of the limited views of the site from the Conservation Area, it is considered the development of the site would not result in adverse impact on the setting or significance of this heritage asset or the historic significance of the centre of Lymm.

On behalf of our client, we therefore urge the Council to take a more detailed consideration of the actual impact of development of this parcel on the Conservation Area, with reference to the above points, over and above the high level assessment provided in the Green Belt Assessment.



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

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

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

On behalf of our client, we welcome the work the Council have undertaken in producing updated evidence on need in the light of the High Court Judgement on the Core Strategy. We do not wish to make any detailed comments at this time in relation to Questions 2, 3 and 4 and the evidence base on housing and employment land needs.

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

We have reviewed the Urban Capacity Study, 2016 SHLAA and Annual Monitoring Report 2015/16 in making our representations and have some significant concerns with the assumptions being made by the Council in assessing likely deliverable land supply across the Borough.

The Urban Capacity Statement states that Warrington and Co. have undertaken detailed masterplanning work relating to the town centre and Inner Warrington and have identified sites in this area have the capacity to deliver 7,176 dwellings as set out in Table 1 of the Statement. No further information is provided however, other than the 'Various Sites Masterplan' in Appendix 1. There is no detailed site assessment information provided, or indication of anticipated densities or mix of uses on what are evidently complex town centre sites.

Whilst we appreciate that there is further work to be done in terms of refining this masterplanning work, we are concerned that this information will not be published until the 'Preferred Options' stage by which time the plan will already be relatively well progressed. We therefore feel it important to set out at this stage our considerable doubts that the identified areas within Inner Warrington can in fact be relied upon to deliver as many as 7,176 new dwellings (or approximately a third of the total estimated housing requirement for Warrington over the plan period).

The SHLAA 2016 gives little justification for the conclusions reached about each site in terms of suitability, availability and achievability. Particularly concerning is the high number of sites in the town centre which are noted to be not available now but are assumed 'likely to become available' in the future. In paragraph 108, the SHLAA states that 90 out of 108 sites which were considered suitable, but not currently available, were considered 'likely to become available'. Stating that *"the main reason leading to the conclusion that sites were likely to become available was where they currently represent obvious infill development opportunities, in high demand market areas, the town centre and adjacent to or within regeneration opportunity areas"*. We do not consider the fact a site is in the town centre is sufficient justification to conclude that it will likely soon be available. It is with concern then we note that several of the sites identified in the Urban Capacity Study do not appear to meet one of the key tests to ascertaining whether or not a site is deliverable, as set out in Footnote 11 of the NPPF.

The majority of development anticipated to come forward within the centre of Warrington comprises long standing, wider regeneration plans which have been identified for a considerable period of time and were described in the adopted Local Plan Core Strategy (2014). Based on the information in the Core Strategy (as the latest information available), the dwellings anticipated to come forward on these sites are frequently expected to do so as part of mixed use schemes and/or will require the implementation of significant levels of infrastructure before they can be brought forward.



By way of example, in Table 1 of the Urban Capacity Assessment, Arpley Road (SHLAA Ref: 2672) is identified as having a capacity of 509 dwellings, 300 of which are identified on SHLAA site 2672. The SHLAA identifies that this site is located in flood zone 2 and faces issues with contaminated land, 'surrounding land issues' and ownership/ tenancy issues. The site is also indicated to be **not** available for development, albeit the SHLAA asserts it is 'likely to become available'.

The Cockhedge 'Masterplan' area is identified as having capacity for 182 dwellings. With no additional information provided, it is not clear which site this relates to since the only SHLAA site identified as relevant has capacity for only 15 dwellings. The Core Strategy identifies Town Hill & Cockhedge as an area of change and opportunity currently comprising the Cockhedge shopping mall and additional retail units to the north of Scotland Road. Policy TC 1 recognises that this area is only likely to come forward in the 'longer term'. Again, given this context and the limited information to suggest otherwise, we have serious concerns that it is not appropriate for the Council to rely on this site for a relatively substantial contribution to the overall supply.

Table 1 in the Urban Capacity Assessment identifies the Waterfront Development Area as being able to deliver 4,432 dwellings. This area therefore accounts for more than half of dwellings to be delivered through the 'masterplanned areas' and around a third of the overall Urban Capacity Total (15,226 dwellings). The area of Waterfront & Arpley Meadows is identified in the adopted Core Strategy as an opportunity for mixed development within the town centre. Policy CS 10 set out how the Council will work with partners to unlock the area and provide appropriate infrastructure necessary to bring forward development, including the Arpley Chord rail line. The constraints facing the site, not least its location partly within areas of flood risk, are acknowledged in Policy CS 10 which recognises it is unlikely that these issues will be satisfactorily resolved before the final 5 years of the plan period.

Without additional information on the masterplanning work which has been undertaken, it is impossible to understand the assumptions about site capacity set out in the Urban Capacity Study and therefore to properly answer question 5. Given what we do know about the sites as set out above however, we are seriously concerned that the Council appear to be overly reliant on sites in Inner Warrington for their housing land supply and that the assumptions being made about these sites are not justified.

This over-reliance risks the Local Plan Review not directing enough development elsewhere in the Borough, thereby failing to take the opportunity to release sufficient Green Belt land to meet needs over the period.

It is partly in light of these concerns, and given the higher level of growth now being planned for, that we urge the Council to direct an appropriate amount of development elsewhere in the Borough. Below Warrington, the largest settlements in the Borough are Lymm, Culcheth and Burtonwood. In line with the guidance within the NPPF to direct development towards sustainable locations, it is essential to ensure the soundness of the Local Plan Review that a considerable proportion of growth is distributed to these other settlements.

Lymm is a highly sustainable location to accommodate additional housing growth. It benefits from a range of local facilities – including several pubs, shops and restaurants in the village centre, two GPs surgeries, a pharmacy, a Post Office, Youth and Community Centre and library. Lymm High School is located in the east of the settlement and there are four primary schools. There are a number of sports clubs and recreational facilities including Lymm Dam. Frequent bus services through the village provide access to Warrington and Altrincham and then on to Manchester and other key destinations. Lymm is located near to the M6/M65 junction and is therefore ideally situated for direct access to the motorway network.

Lymm is tightly surrounded by Green Belt and has therefore has extremely limited new housing growth in the last decade. The Mid-Mersey SHMA (January 2016) identifies that Lymm is a particularly high value market area and affordability is a significant issue.



It is imperative that the Council take the opportunity presented by the Local Plan Review to examine the Green Belt around Lymm and release a sufficient amount to meet the current and future housing needs. A failure to do so would not be consistent with national policy which seeks to direct development towards sustainable locations and meet a range of housing needs through local plans. It would result in a Local Plan unable to respond to changes in circumstance and thereby secure the long term permanence of Green Belt boundaries, as advocated in the Framework.

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

In light of the increased housing requirement, it is now essential that Green Belt is released across the Borough. The Green Belt in Warrington wraps tightly around the existing built up areas and The Urban Capacity Study 2016 undertaken by the Council demonstrates that there is not sufficient land either within the built up area or on greenfield land outside of the Green Belt to accommodate anywhere near the required level of growth. Exceptional circumstances therefore exist which justify alteration of the Green Belt boundaries through the Local Plan Review in accordance with paragraph 83 of the NPPF.

Accordingly, our client welcomes the Council's recognition in the Scope and Contents Document that the Local Plan review will need to release some Green Belt land and the work towards the Green Belt Assessment. The review of the Local Plan represents a vital opportunity to comprehensively review the Green Belt boundary and release land in appropriate locations to promote sustainable patterns of growth in accordance with paragraph 84 of the Framework.

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

We agree that the three strategic matters identified are appropriate however, it is not entirely clear from the wording of these matters that the distribution of growth in the Borough is also a matter to be considered through the Local Plan review. Given the increased scale of growth required in the review, and the need to release Green Belt, it is evident throughout the rest of the document that the distribution of development will need to be a matter for consideration. However, it would be helpful to have this set out more definitively in the wording of 'strategic matters'.

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?

On behalf of our client, we support the Council's intention to identify safeguarded land as advocated in the Framework when undertaking a Green Belt Review. This is a particular issue, given our concerns as expressed in relation to Question 5, that some of the identified sites within Inner Warrington may well not deliver as anticipated either in terms of number of dwellings or in terms of appropriate timescales.

In accordance with the NPPF, when reviewing Green Belt boundaries, local planning authorities should satisfy themselves that the revised boundaries will not need to be altered at the end of the development plan period (paragraph 85). Ensuring a sufficient amount of land in appropriate locations is safeguarded for development in the future will be a vital role of the Local Plan Review ensuring that the opportunity to review the Green Belt boundaries in a comprehensive manner is not wasted and the Local Plan is able to withstand an ever evolving economic, social and political context over the reasonably foreseeable future.



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

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

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

Our client has no comment to add in relation to questions 9, 10 or 11.

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

We broadly agree with the assessment of Local Plan Policies at Appendix 1, although clarity is required over the extent of review intended in relation to Policies CC1, CC2 and CC3 which are contradictorily identified as requiring both 'minor alterations' and 'major alterations'.

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

With reference to our answer to Question 8, we welcome the proposed 20 year plan period given the need for the Local Plan review to release Green Belt across the Borough in a manner which ensures they are capable of enduring beyond the plan period, in line with guidance in national policy.

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?

It is essential that the Site Assessment work that informs the 'Preferred Option' draft is also made available for comment at an appropriate stage allowing sufficient time for consultees to review and make comment.

