

**Development Plan Representation – Warrington Borough  
Council Local Plan Review**

# **Local Plan Review Scope & Contents Document**

On behalf of Langtree Property Partners

5 December 2016



## I. Introduction

Spawforths have been instructed by **Langtree Property Partners** to submit representations to the proposed Local Plan Review Scope & Contents Document (October 2016) and its supporting evidence base, which has been published for consultation from Monday 24 October 2016 through to 5 December 2016.

Langtree have significant land interests in Warrington and are seeking to promote land to the south east of the Warrington urban area.

Langtree welcomes the opportunity to engage in the Local Plan Review and look forward to being an active participant in further stages as the plan process evolves.

We welcome the need to review the current Local Plan Core Strategy given the results of the High Court Challenge and the emerging evidence recently prepared, which clearly sets out the Borough's growth ambitions and housing and employment needs to reflect this aspiration. This evidence base will need to underpin the emerging Local Plan Review.

We support these growth ambitions and overall intentions, underpinned by the housing and employment evidence base, aligned with job growth, which recognises the need to identify more housing and employment land in the Borough. However, we do have concerns with the methodology and approach taken in the Green Belt Assessment undertaken by Consultants Arup on behalf of the Council. This might result in a growth strategy which limits the ability to locate housing and employment in the right locations for growth and result in a strategy which is not capable of delivering sufficient levels of housing and employment development to meet the objectively assessed employment and housing needs and growth ambitions of the Borough.

In our view, it is imperative that the evidence base used to inform the Local Plan Review applies the right methodology and approach in order to ensure the right levels of growth to ensure the Local Plan Review meets the four tests of soundness, set out in paragraph 182 of the Framework.

We trust that you will confirm that these representations are duly made and will give due consideration to these comments.

Please do not hesitate to contact us to discuss any issues raised in this Representation further.

## 2. National Planning Policy Context and Tests of Soundness

The Government's core objectives as established through the National Planning Policy Framework (the Framework) are sustainable development and growth. Paragraph 14 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The core planning principles are set out at paragraph 17. These include that planning should make every effort to proactively drive and support sustainable economic development to deliver the homes and businesses that the country needs. Plans should take account of market signals and allocate sufficient land to accommodate development within their area. The key focus throughout the Framework is to build a strong, competitive economy and to deliver a wide choice of high quality homes.

In relation to Local Plan formulation, paragraph 150 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.

In relation to the examination of Local Plans, paragraph 182 of the Framework sets out the tests of soundness and establishes that:

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

This document therefore considers the content of the Local Plan Review Scope & Contents Document and supporting evidence base on behalf of Langtree in light of this planning policy context. This representation comments on the questions detailed within the Consultation Document with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that Local Plan Review is made sound.

### 3. Response to Questions

We have set out Langtree's response to the questions proposed in the consultation document as follows:

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

The range of evidence used to inform this Scoping stage of the Local Plan Review is appropriate. Elements of this evidence base will require updating as the Local Plan evolves and prior to the Preferred Options being published for consultation. Detailed comments have been provided in response to the publication of the Council's evidence base in reply to the questions set out in Council's Consultation Document. See responses below.

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

The 2016 SHMA concludes that the objectively assessed housing needs across the Mid-Mersey Housing Market Area to be 1,756 dwellings per annum (dpa). The identified disaggregated need for Warrington is 839dpa. The recent 2016 SHMA Addendum by GL Hearn identifies a higher requirement of 984dpa due to increased job prospects based upon the Local Enterprise Partnership's (LEP) devolution proposal which aims to create 31,000 additional jobs in the Warrington Borough from 2015 to 2040.

We conditionally support the findings and conclusions of the Council's assessment of housing needs, underpinned by the OAN set out in the Mid Mersey SHMA 2026 and its Addendum prepared in October 2016. The SHMA identifies the objectively assessed housing need (the OAN), and the Local Plan now reflects an objective analysis of the evidence and translates this need into land provision targets. Conditional support is provided, given any future stages of the Local Plan will need to be updated to reflect up-to-date 2014 based sub-national population and household projections now released following publication of the SHMA.

The 2014 based sub-national population and household projections recognise that over the period 2014 to 2037 there is a slight reduction in housing need over the plan period. These household projections, should now be used to provide the 'starting point' for establishing the OAN in any further Local Plan work. The PPG states that the household projections

may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. Considering the demographics of Warrington and previous household formation rates, particularly amongst younger age cohorts, an adjustment to household formation rates is also appropriate and should be considered in subsequent stages of the Local Plan Review process.

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

We conditionally support the findings and conclusions of the Council's Economic Development Needs Study (EDNA) (October 2016) undertaken on behalf of the Council by Mickledore & BE Group, which is the most up-to-date evidence on employment needs in the Borough.

A further review of economic forecasts and housing numbers has been undertaken by Mickledore. We have reviewed this in further detail as part of 'Question 4' of this representation.

The report has had regard to the requirements of the NPPF and the PPGs which seeks to encourage and deliver growth through the planning system. The Study recommends that the Council should adopt the strategic/local land take-up scenario. This suggests that the Borough has a further land need, additional to the current realistic supply, of 276.37 ha, to 2037.

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

We support the Plans intention to align job growth and housing needs. This approach is considered consistent with the NPPF (paragraph 158) and PPG (ID 2a-018).

We agree that the OAN figure should be used as a starting point to identify housing need and should be aligned with additional job growth created through the Council's growth aspirations, which is a measure of future demand set out in the Warrington Means Business economic development programme and the LEP's Strategic Economic Plan which is expected to deliver 31,000 new jobs up to 2040. The level of housing need identified in the SHMA therefore needs to reflect the additional jobs created to ensure a balance between homes and jobs.

This approach recognizes that demographic projections are trend-based and they will need to be adjusted to take account of factors that are not captured by those trends, including market signals and future job growth.

This approach is also consistent with the NPPF at paragraph 70, which says that planning should integrate the location of housing, economic activity and community facilities and services. The PPG discusses the relationship between housing need and employment at paragraph 01835. It advises that plan-makers should make an assessment of future job growth and notes that, if future labour supply is less than this projected job growth, this could

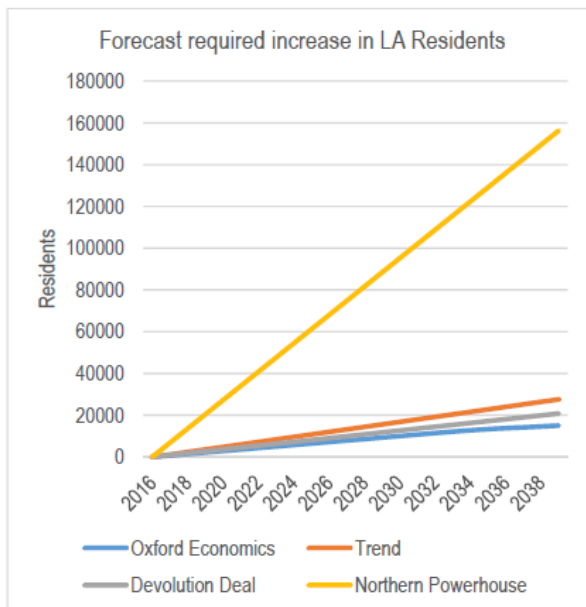
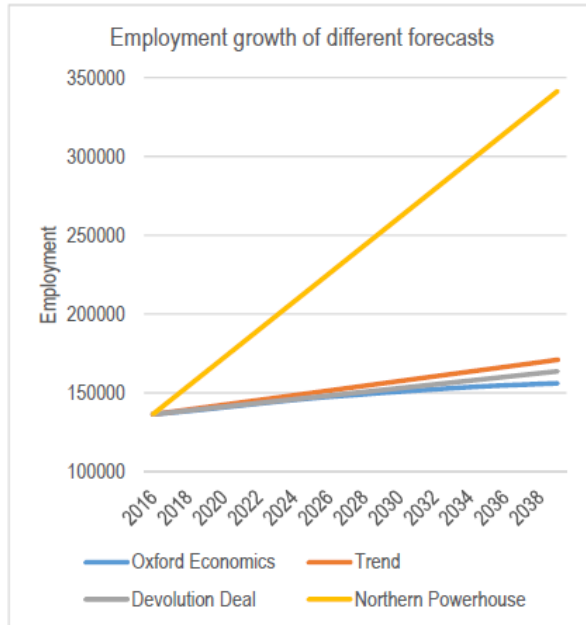
*'result in unsustainable commuting... or reduce the resilience of local businesses'. In such circumstances, plan-makers will need to consider how the location of new housing and infrastructure development could help address these problems.'*

Demographic projections should be tested against expected future jobs, to see if housing supply in line with the projections would be enough to support those future jobs.

Warrington BC and their consultants Mickledore have looked at four economic forecast scenarios, including forecasts prepared by Oxford Economics, previous employment trends based on absolute employment increases, the Devolution Bid employment forecasts and what could be achieved under Northern Powerhouse growth projections.



The graphs below demonstrate the differences in employment growth based on each scenario and how these translate into additional residents required.



The previous employment trends scenario highlights the Oxford Economics predicted uplift in employment is below the long-term employment trends in the Borough, although this

trend based scenario does result in a high growth figure, which may not continue at the same rate of growth. The graphs demonstrates the scale of ambition within the Northern Powerhouse scenario, however it is more likely that the majority of growth associated with this scenario is more likely beyond 2037, once significant infrastructure has been undertaken to achieve the output predictions of the Northern Powerhouse, therefore we consider that this scenario is less reliable.

The Devolution Bid employment policy trend scenario includes forecasts from the LEP's Strategic Economic Plan, based on aspirations for growth in the area and is more reliable than the Oxford Economics and Northern Powerhouse scenario's. If the Council is to match its aspiration and ambition to progress from a New Town to a 'New City', we consider a scenario with a high level of job growth should be considered. For these high levels of growth to continue the Council will need to identify further strategic housing and employment sites. Whilst the devolution bid scenario is a reliable forecast to using as a starting point, it is important to note that the additional level of job creation (31,000) is actually less than that achieved over the period 1992 to 2014. Any forecasting of job numbers must also be careful not to be too ambitious, based on aspiration rather than economic forecasting. The Council will need satisfy themselves that there is realistic prospect that the growth aimed for is achievable.

In summary, we consider that this level of evidence base is consistent with the requirements of the Framework, paragraphs 17, 158 - 161 and provides the most up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area, taking full account of the relevant market and economic signals, required to inform the allocation of sufficient land to accommodate development within the area.

The emerging Local Plan Review must now identify development requirements for NPPG compliant housing and employment areas. This will need to include the scale of need within these areas and focus on meeting all development needs in order to create places and to deliver regeneration.

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

We conditionally support the Council's detailed assessment of land supply set out in their SHLAA (2016) and Urban Capacity Statement, EDNA (2016) and Open Space Audit (2016).

This confirms there is additional capacity to accommodate approximately 15,000 new homes in the existing urban area and on green field sites outside of the Green Belt. This will be subject to change, prior to preparation of the Council's preferred Local Plan development option, which will need to take account of additional sites submitted as part of the Council's recent 'call for sites' process.

The methodology for establishing this urban capacity figure is a product of the updated SHLAA figure; the Warrington & Co. Master Planning work, which has identified the potential for approximately 3,500 homes in addition to those identified in the SHLAA, plus a windfall allowance for the 15 year SHLAA period (i.e. years 1-5, 6-10 and 11-15). The assumptions made on windfall allowance are not consistent with the Planning Practice Planning Guidance (Paragraph: 24 Reference ID: 3- 24-20140306). The Council is reliant upon a 64dpa windfall allowance; however it does not appear to have applied any discount to extant planning permissions. This windfall allowance appears to be based solely upon historic completions from this source between 2009/10 and 2014/15. This indicates an average of 64 dwellings from windfalls each year. This delivery from windfalls is skewed by the final two monitoring years which delivered 139 and 83 windfall dwellings in each year. If these two years are removed the average rate based on historic completions drops to 41dpa. We recommend a discount is applied to the first few years and further consideration is then given to the impact of the final two monitoring years upon average windfall delivery.

Historic completions provide a useful context. Paragraph 48 of the Framework, requires an assessment of whether they will continue to provide a reliable source of supply in the future. This element of the assessment is currently appears to be absent from the '2016 Urban Capacity Study' and 2015 Strategic Housing Land Availability Assessment (SHLAA). In determining future windfall supply the Council should consider the prospects of continued delivery from different elements of the supply. This assessment should be made in the context of a new Local Plan with new allocations and a more comprehensive assessment within the SHLAA. It is recommended that further analysis should be undertaken by the Council to look at sources of windfall supply and consideration given to their likely delivery over the plan period.

It is also unclear from the SHLAA and Urban Capacity Study whether any discount has been applied to sites already benefitting from planning permission. Some sites will not always be

developed following the grant of planning permission for a wide range of reasons, which often leads to a lapse rate in planning permissions. A lapse rate is commonly applied to the supply in the examination of local plans. Ideally the scale of any lapse rate should be determined locally. In the absence of local information a common approach, which has been accepted at a number of planning appeals, is to provide a 10% deduction in unimplemented housing permissions. It is recommended that this issue be given further consideration by the Council.

It would also be sensible for the emerging Local Plan to contain a buffer of sites to counter any none or under delivery from allocations or windfalls. The housing requirements set within the plan should be viewed as a minimum requirement. If the plan is to achieve its housing requirement as a minimum, it stands to reason that additional sites will be required to enable the plan requirements to be surpassed. It is also inevitable, due to a variety of reasons, that some sites will either under-perform or fail to deliver during the plan period. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement.

Notwithstanding our comments regarding windfall assumptions, the SHLAA and Urban Capacity Statement and EDNA undertaken at the same time establishes realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing and economic development over the plan period. This assessment of housing and business needs is consistent with the requirements of paragraph 159, 160 and 161 of the Framework.

In parallel with the urban capacity work, the Council's EDNA identifies a realistic deliverable supply of employment land, within existing and planned employment areas and the Open Space Audit identifies a deficiency of open space across the Borough, meaning there is no surplus areas of open space in the urban area which lend themselves to redevelopment for residential purposes.

We support the conclusions of this assessment of land supply in the Borough which concludes that the Council is unable to accommodate all of its development needs within the existing urban area and on greenfield sites outside the Green Belt.

Based on this assessment of urban capacity, if Warrington is to meet its development needs, sufficient Green Belt land will need to be released to deliver approximately 5,000 homes and 261 ha of employment land identified in the EDNA over the next plan period of 20 years.

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

Following the High Court ruling, the Council now needs to undertake a fundamental review of the Local Plan and assess whether Green Belt boundaries should be altered to meet identified housing and employment need.

The `Barker Review of Land Use Planning, Final Report and Recommendations` (2006) concluded that whilst the stated `key principles of Green Belt policy remain valid`, Local Planning Authorities should continue to review green belt boundaries to ensure that they remain appropriate given sustainable development needs, including regeneration.

Similarly, in a Written Ministerial Statement on Green Belt (6 September 2012) it is re-affirmed that Councils can review local Green belt designations to promote growth. The statement sets out that the Government encourages Councils to use the flexibilities set out in the National Planning Policy Framework to tailor the extent of Green Belt land in their areas to reflect local circumstances. Where Green Belt is considered in reviewing or drawing up Local Plans, the Government will support councils to move quickly through the process by prioritising their Local Plan examinations.

This Green Belt Review and recommendations contained within the Green Belt Assessment is crucial to deliver the necessary growth throughout the Warrington Borough and release sufficient land to achieve its ambitions to become a `New City`.

The Green Belt Assessment needs to use an appropriate methodology to ensure that the evidence is robust and a full and objective assessment can be made.

The assessment of the Green Belt must balance the differing perspectives of the role of the Green Belt. PAS guidance states the issue relating to Green Belt is:

*“...maintenance of the purposes of Green Belt set against the under provision of housing across many parts of the country, where the capacity to accommodate sustainable development in urban areas is often insufficient to meet the housing requirement.”*

This approach recognizes that many sustainable locations for development may now be in Green Belts.

The Council has appointed Arup to undertake a Green Belt Assessment to carry out an assessment of the Borough's Green Belt to understand how it performs against the role and function of Green Belt as set out in National Policy. This assessment will be used by the Council to enable them to consider whether there are 'exceptional circumstances' (under paragraph 83, NPPF) to justify altering Green Belt boundaries through the Local Plan Process to enable existing Green Belt land to contribute to meeting Warrington's housing and employment needs.

Whilst this does not consider whether 'exceptional circumstances' exist or make any recommendations relating to the alteration or review of Green Belt boundaries, it provides an initial assessment of the Green Belt and makes recommendations as to further more detailed site specific assessment work which needs to be undertaken as part of the Local Plan Review process on specific land parcels within the Borough which the Report suggests make a weak contribution to the five purposes of the Green Belt.

We support the principle of Green Belt release advocated in the Council's emerging Local Plan Review, given there is clear housing and employment needs based evidence which confirms Warrington cannot meet its development needs within the existing urban area, without sufficient Green Belt land being released. However, we have concerns with the methodology and approach adopted by Arup in their Assessment and the subsequent conclusions this draws, which we do not consider is consistent with the Framework. This Green Belt Assessment in its current form is therefore unsound.

It is important to note that the NPPF and NPPG do not provide any specific guidance as such on how Green Belt Assessments should be conducted and the methodology to be applied.

We broadly support Arup's Stage I Methodology, which seeks to divide the entire Green Belt into large parcels of land, defined as General Areas. These General Areas (GA) are subdivided into logical parcels of land and each parcel is assessed against the five purposes of the Green Belt set out in paragraph 80 of the Framework. The results of this Stage I Assessment confirms the level of contribution the GA makes to the five purposes, scoring it as, weak, moderate or strong.

We consider that there is a case to co-join General Areas 9 and 10 utilising the M6 and M56 as the General Area eastern and southern boundaries. This would make a more logical GA land parcel using clear boundaries that are recognizable and permanent, providing the opportunity to consider this as large south east quadrant, similar to the original principles of the New Town agenda, which originally looked at the value and contribution this area of land made to the purposes of the Green Belt and subsequently focused on outward expansion to the south and south east of Warrington

We do not support Arup's conclusions relating to their Stage 1 Assessment of General Area 9, which concludes this parcel as a whole makes a moderate contribution to the Green Belt purposes.

The Stage 1 Assessment confirms that this parcel makes a moderate contribution to purpose 1. We disagree with this assessment and consider that this parcel is within a wide gap between the Warrington urban area and Lymm which is already separated by the M6; therefore it does not make any significant contribution to preventing towns from merging (purpose 2). We disagree with Arup's assessment of purpose 3 and consider the M56 and M6 provide more durable boundaries which would prevent encroachment beyond the GA if this land was to be released from the Green Belt. We agree with Arup's Assessment of the GA in the context of purpose 4 which states the GA makes a weak contribution to purpose 4, given there is a large separation between the Warrington Parish Church and the GA and it provides a moderate contribution to purpose 5 with a small percentage of brownfield land which assists in urban regeneration. In summary, we consider the M6 provides a more logical and permanent boundary to the Green Belt in this location.

We also have significant concerns with Arup's Stage 2 approach and methodology and how they have defined smaller Green Belt parcels around settlements inset from the Green Belt and only where General Areas made a lesser contribution to the Green Belt (no or weak) was a General Area divided into smaller Green Belt parcels and assessed. Smaller parcels were only drawn around the inner extent of the Green Belt, one parcel width from the settlement boundary outwards.

Only those smaller parcels of land were then assessed as part of Stage 2 to consider whether a broader width of parcels (beyond the initial parcel width outwards from the settlement boundary) needed to be defined and subsequently assessed as part of Stage 2A.

We disagree with this approach. All GA parcels should be broken down and explored as part of the Stage 2 methodology and not just those that were lower performing against the Green Belt purposes. It is premature to dismiss any parcel at this stage in the process, prior to a full assessment of employment and housing need evidence base, a full and detailed site selection process and the call for sites stage, which should all inform the plan process. We consider that those General Areas which have been broken down into smaller parcels as part of Stage 2 have been broken down too small. Parcels should be broken down into larger parcels at this early stage in the process and look beyond one parcel width from the urban area. There is nothing in the national guidance or PAS guidance which recommends that parcels should be subdivided in this way. There are many other physical and durable features which could be used to define manageable parcels that extend beyond just one parcel width from the urban area.

The Arup Green Belt Stage 2 Assessment is undertaken for parcels with arbitrary boundaries that are currently unrelated to development options and do not consider opportunities for mitigating the loss of openness. Therefore the conclusions of the Stage 2 Assessment are of limited value.

Whilst the Recommendations section (paragraph 6.2) of the Arup Assessment recommends that only a further assessment of parcels in GA10 will be undertaken following the Council's call for sites exercise, this appears to conflict with commentary provided in paragraph 148 of the Assessment. Paragraph 148 does not appear to dismiss a second width of parcels being assessed around ALL parcels that formed part of the Stage 2 Assessment as work on the Local Plan and call for sites progresses and not just those within GA10.

We seek clarification from the Council on this point, and welcome the opportunity for the Council to look at further widths of parcels across ALL GA's as the Local Plan progresses.

Subsequent stages of the Green Belt Assessment must now undertake a rigorous assessment of all land parcels (including Langtree's sites referenced below) to meet the Council's housing need and that the historic Green Belt designation and existing boundaries



should not be a constraint to identifying the most sustainable option, consistent with paragraph 84 of the Framework.

Langtree consider that assessment criteria used as part of any further stages of the Green Belt Assessment should be focused on using the most appropriate sustainable and deliverable sites to achieve the objectives of housing and economic growth.

A thorough and robust Green Belt Assessment should balance the Green Belt functions of an area with the need for development in relatively 'sustainable' locations. Previous Green Belt studies have shown, that areas of Green Belt that are the most sustainable locations for development are also those that can often rank highest in terms of their Green Belt functions. A robust Green Belt review and Assessment must therefore balance maintaining the openness of Green Belt areas with the need for sustainable development.

Considerations set out in the Framework paragraphs 83 – 85 and the need to promote sustainable development are as important as the five purposes of the Green Belt set out in the Framework.

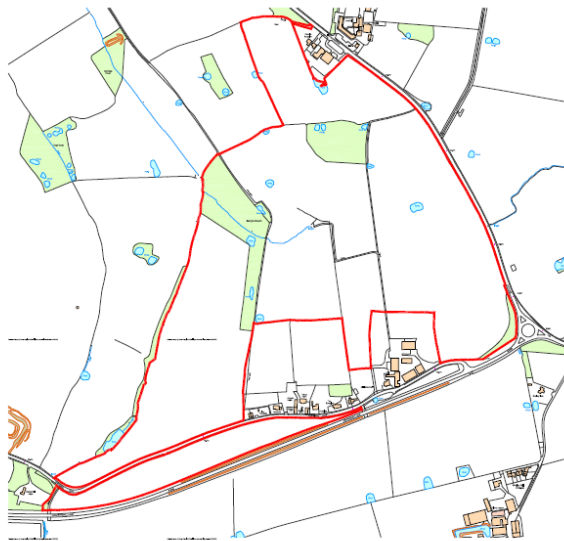
Langtree have a number of parcels of land south east of the main Warrington urban area, which are currently designated as Green Belt.

These parcels are identified overleaf.

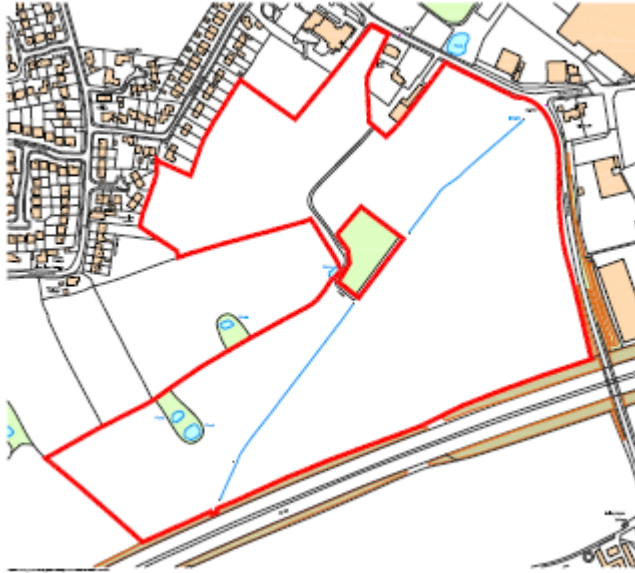
**Site 1 - Land north of Knutsford Road, Grappenhall (Eastings) 365267  
(Northings) 385974**

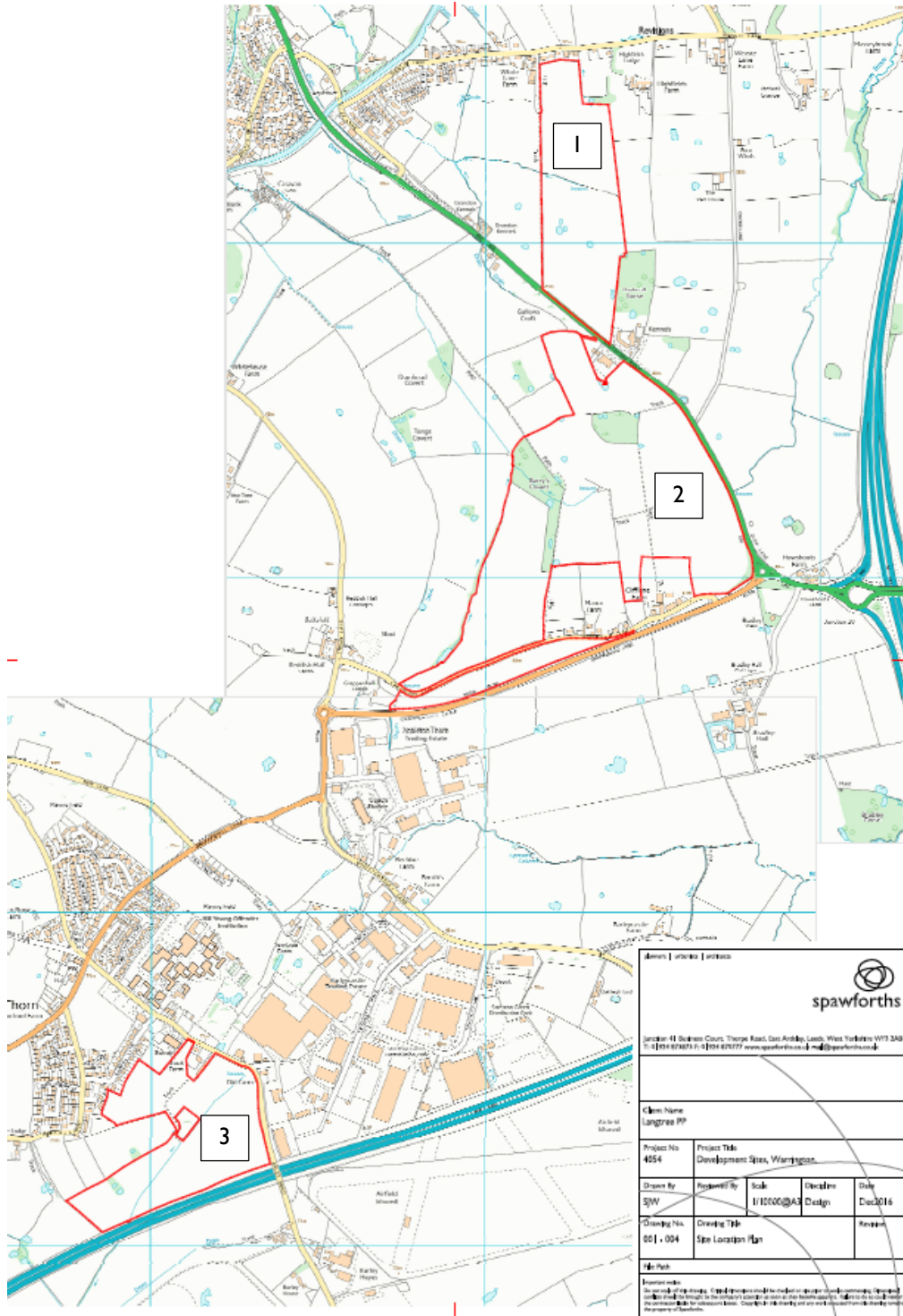


**Site 2 - Land north of Grappenhall Lane, Grappenhall (Eastings 365298 (Northings) 385478**



**Site 3 - Land south west of Arley Road, Appleton Thorn (Eastings) 364102  
(Northings) 383467**





**spawforths**

Unit 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

Client Name  
Langtree PP

Project No  
4054

Project Title  
Development Sites, Warrington

Drawn By	Reviewed By	Scale	Discipline	Date
SJW		1:10000@A3	Design	Dec 2016

Drawing No.	Drawing Title	Revision
001 - 004	Site Location Plan	

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Sites 1 and 2 are not currently considered as part of the Stage 2 Green Belt Assessment, given they are beyond one parcel width from the main urban area. Site 3 is identified as parcel AT13 in Arup's Stage 2 Assessment, which concludes that this parcel currently makes a weak contribution to the purposes of the Green Belt. We support Arup's Assessment of this parcel which if removed from the Green Belt for housing would be a logical rounding off of the urban area and is already defined by the strong edges of the existing urban area, Arley Road and the M56, which would create a new permanent boundary to the Green Belt.

Any further Stage 2A Green Belt Assessment undertaken by the Council should include a proper assessment of the strategic options for development and growth to accommodate future large scale residential urban extensions, including Sites 1 and 2 which forms part of a quadrant of land to the south east of Warrington, consistent with paragraph 52 of the Framework. This should form part of a strategic framework and masterplan to ensure any urban extensions are cohesive with the existing urban area and follow appropriate design principles. These must be planned in appropriate sustainable locations close to existing and proposed employment facilities to encourage mixed use developments and communities which facilitate the co-location of jobs and homes, consistent with paragraph 38 of the Framework.

Although the five purposes set out in the Framework have been used to assess areas of Green Belt for the purposes of the Arup Green Belt Assessment, there is no indication in the policy that they are intended or suited to be used in this way. At present the Green Belt Assessment performs an exercise which shows that existing areas of Green Belt perform Green Belt functions, with some areas performing better than others. Further stages of the Green Belt Assessment should be undertaken in parallel with other evidence base to provide a basis to make clear judgments about the planning balance that needs to be struck between development at sustainable locations within the Green Belt and the resulting reductions in some areas of open land.

It is not appropriate to release a site from the Green Belt solely for the reasons it performs fewer Green Belt functions than other areas, or because it performs certain Green Belt functions less well than other areas. However, it should be appropriate to balance functions of the Green Belt with the need to allocate land for development if it were a suitable and sustainable location for development.

The Green Belt Assessment and Review of the Green Belt in Warrington should place more emphasis on meeting identified development requirements and sustainable patterns of development, in accordance with the policies of the NPPF; balancing these requirements against the existing roles of the Green Belt; considering ways in which development can mitigate the loss of open areas and enhance the remaining parts of the Green Belt through landscaping; and forming new Green Belt boundaries that have a realistic prospect of enduring beyond the next plan review.

The next stages of the Local Plan should look at preferred options that show strategic development opportunities with any related areas of Green Belt that will need to change. A Green Belt Assessment should be combined with a sustainability appraisal of strategic development options, so that the criteria for review of the Green Belt are considered in conjunction with wider planning criteria.

### **Conclusions**

In summary, we object to the initial findings and conclusions of the Stage 2 Green Belt Assessment undertaken by Arup, on behalf of the Council.

Subsequent stages of the Green Belt Assessment must undertake a rigorous assessment of all land parcels to meet the Council's employment and housing need and that the historic Green Belt designation and existing boundaries should not be a constraint to identifying the most sustainable option, consistent with paragraph 84 of the Framework.

The Assessment should give further consideration to paragraphs 83 – 85 of the Framework and the need to promote sustainable development, which are as important as the five purposes of the Green Belt set out in the Framework. A further Stage 2A Assessment should re-assess all land parcels.

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

The three strategic matters are considered appropriate, assuming this includes aligning the housing requirement with the economic aspirations.

**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?**

We agree that further land will need to be removed from the Green Belt and Safeguarded for future development needs beyond the Plan period as highlighted in our response to Question 6.

Paragraph 85 of the Framework identifies that where necessary Local Plans should provide safeguarded land to meet longer term development needs stretching “...well beyond the plan period...” and that local authorities should satisfy themselves that Green Belt boundaries “...will not need to be altered at the end of the development plan period...”. Paragraph 157 of the Framework also advocates a 15 year time horizon for Local Plans. It would therefore appear appropriate to ensure that the Green Belt boundaries are capable of enduring until at least 15 years beyond the end of the plan period.

This will provide a robust long-term Green Belt boundary but will also provide certainty for residents and the development industry in terms of likely growth locations beyond the end of the plan period. It is recommended that the Council carefully consider the amount of land required to ensure that Green Belt boundaries will not be required to be further amended upon the review of this Local Plan.

**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?**

We have no comments in respect of Question 9.

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

We consider the Sustainability Appraisal Scoping Report to be appropriate and agree with the four stage process it advocates.

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

We consider the Spatial Distribution and Site Assessment Process at Appendix 2 to be an appropriate process.

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

We agree with the assessment of relevant Local Plan policies at Appendix 1.

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

We consider this plan period to appropriate and should ensure a 15 year time horizon, post adoption, in conformity with paragraph 157 of the Framework.

**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?**

We have no further comments in respect of Question 14 beyond those expressed in response to earlier questions.