



**CHESHIRE EAST LOCAL PLAN SITE ALLOCATIONS AND
DEVELOPMENT POLICIES DOCUMENT (SADPD)
SEPTEMBER 2020**

LOCAL PLAN EXAMINATION

MATTER 5 – TOWN CENTRES AND RETAIL

ON BEHALF OF THE TATTON ESTATE

Date: September 2021

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1. INTRODUCTION

- 1.1 This Statement deals with **Matter 5 – Town Centres and Retailing.**
- 1.2 Pegasus Group has been instructed on behalf of their client, The Tatton Estate, to prepare Hearing Statements to the Cheshire East Site Allocations and Development Policies Document (SADPD) in support of their land interests in the Borough, which are extensive but in the context of this particular hearing statement relates to land within and adjacent to Knutsford Town Centre and surrounding allocations in the Part 1 Local Plan at Parkgate and NW Knutsford.
- 1.3 We submitted comprehensive representations at the Regulation 18 and 19 stages of the Local Plan process and we will refer to the latter within this statement and at the Examination hearing sessions.

2. RETAIL HIERARCHY (POLICY RET 1)

Question 77: Should the new local centres proposed as part of the strategic allocations in the LPS be included as 'local urban centres' or 'neighbourhood parades of shops' in the retail hierarchy in Policy RET 1, to ensure that, once built, there is a clear and effective policy framework for guiding future development, including changes of use, within them?

- 2.2 We agree that where a strategic site policy makes reference to a new local centre or the ability to meet local retailing needs, Policy RET1 should list and highlight where these centres are located so they form part of the retail hierarchy going forward, particularly if there is clear evidence that such local centres are being proposed.
- 2.3 The proposed local centres set out in the Strategic Allocations from the Part 1 plan vary in form and description including the range of uses prescribed/suggested. However, a common theme is that the retail provided should appropriately address local needs. Some policies include specific floor areas (for instance a convenience store of no more than 400 sq m net) but most are not specific. Some of the site policies also list other complementary uses, which vary from:
- Childcare Day nurseries,
 - Hotel,
 - Pubs,
 - Restaurant/Café,
 - Takeaway,
 - Community Centres,
 - Health Centres,
 - Car Showroom.
- 2.4 For reference, the relevant site policies are LPS2, LPS3, LPS4, LPS20, LPS33, LPS46 and LPS36. The latter site relates to NW Knutsford where Tatton Estate have advanced an mixed use application that includes a new Local Centre, which the Council's planning committee has resolved to approve subject to the signing of a s106 agreement (application ref: 18/3672M).
- 2.5 Until these centres are built and occupied, we appreciate that it might be difficult to understand what status they should have in terms of their position in the proposed retail hierarchy. However, the locations could be listed (including the approved Local Centre at LPS36) and more clear guidance could be provided in terms of the acceptable scale of development within each location based on the Council's latest retail evidence, which quantifies retail needs within each of the main settlements.

- 2.6 In the case of NW Knutsford, Strategic Policy LPS36 allows for appropriate retailing to meet local needs rather than reference to the delivery of a new local centre. However, other parts of the policy also support the provision of community uses. Moreover, as evidenced in the Council's retail assessment, and highlighted in Table 9.3 of the SADPD there is a significant amount to surplus expenditure to support new convenience retail development in Knutsford.
- 2.7 On the back of Policy LPS36 and Council's retail needs assessment, Tatton Estate sought approval on the NW Knutsford for a range of complementary uses, not too dissimilar to the range of uses listed above. The application was approved at committee subject to a s106 agreement. The committee report¹ confirms the description of development as follows:

“Outline application (with all matters reserved for future approval) for a residential-led (Use Class C3) development, including a local centre comprising of retail, residential and community uses (Use Classes A1, A2, A3, A4, A5, D1 and C3 uses); a mixed residential use area to allow for residential dwellings (C3 Use Class), a Hotel (C1 Use Class), and/or a Residential Care Home (C2 Use Class); alongside any associated recreational space, car parking, cycle parking, landscaping, and other work for all proposed uses”

- 2.8 The original application sought approval for up to 300 homes (including C2 care provision), up to **2,500 sq m of retail floorspace** (including a small convenience store and several smaller retail units (A1, A3, A4 and A5), up to 800 D1 floorspace, a public house and a small boutique hotel and a car showroom. As such, the range of proposed uses was not dissimilar to other local centres proposed through the Local Plan site allocations.
- 2.9 Despite the scale of development being fully justified, officers requested that the retail floorspace was reduced to 1,000 sq m and the car showroom was removed. At committee members then insisted that the pub and hotel were also dropped from the proposals albeit with limited justification for this request. These changes were confirmed in the corrected committee minutes, the relevant extracts of which are replicated below:

RESOLVED

That, except for the Public House (Use Class A4) and Hotel (Use Class C1), for the reasons set out in the report and in the written update to the Board, the application be approved subject to the completion of a Section 106 Agreement securing the following:-

¹<https://moderngov.cheshireeast.gov.uk/ecminutes/ielistDocuments.aspx?Cid=279&MId=7139&Ver=4>

27. The proposed local centre/parade of shops hereby approved shall comprise of no more than 1,000 sq m gross of A1 retail floorspace. No individual retail unit shall be more than 450 sq m gross. The convenience goods floorspace in any one retail unit should not exceed 280 sq m net.

2.10 This was agreed at the time to obtain the resolution to approve rather than proceed with a costly appeal. However, for reasons we come onto under separate questions, we consider the scale of the original proposals in retail floorspace terms were justified by the Council's and our own retail evidence prepared at the time, which has been corroborated by updated Retail evidence prepared to support the SADPD.

2.11 Appendix 1a of our Revised Regulation 19 Representations contains the originally submitted zonal masterplan and Appendix 1b contains the revised zonal masterplan, which was subsequently approved at planning committee. The principal difference is the loss of the employment zone 1ha that was going to accommodate the hotel, pub, car showroom, etc.

Question 78: Based on the evidence submitted, is Policy RET 1 justified in designating Dean Row Road as a local urban centre or should it be designated as a local centre?

2.12 No comment.

Question 79: Should the proposed minor amendment to paragraph 9.6 in the justification to Policy RET 1, which seeks to ensure local urban centres are included within the definition of 'town centres', be considered as a Main Modification? Should the definition of a 'local urban centre' in the Glossary to the SADPD be similarly modified? Would these changes be consistent with national policy?

2.13 Policy RET 1 does need to clearly distinguish between what is a 'local service centre', a 'local urban centre' and a 'neighbourhood parade' and what retail tests will be applied to each.

2.14 The NPPF confirms that neighbourhood centres should not be regarded as town centres and therefore they are not areas that are subject to the sequential or impact tests applied by national policy when considering proposals for out of centre retail development. This does not mean they should be excluded from Policy RET 1 because it is helpful that they are listed, but the policy needs to be clear as to how these centres will be regarded.

2.15 Paragraph 9.6 of the submission draft of the plan states that the 'local urban centres' will effectively hold the same status as neighbourhood centres in policy terms but this is only expressed in the supporting text. If that is to be the case, we consider this should be made more explicit in the policy itself given the confusion that could be caused (noting Local Centres are defined as town centres in the NPPF Glossary). However, we note that that original addition of text at paragraph 9.6 is now being proposed to be removed but we would welcome clarity from the Council on how

they expect the standard retail tests to be applied to 'local urban centres' as we have not seen the justification for this change.

- 2.16 Irrespective of whether the proposed minor modification is justified/sound, it does constitute a main modification because it does fundamentally alter the policy test applied to local urban centres.

3. BOUNDARIES TO TOWN, LOCAL & URBAN CENTRES, & NEIGHBOURHOOD PARADES

Question 80 - Are the boundaries for the principal town centres, town centres, local centres, local urban centres and neighbourhood parades, as proposed on the draft Policies Map, consistent with national policy aims for town centres, positively prepared and justified by proportionate evidence, and would they be effective in guiding development proposals for main town centre uses alongside the relevant policies in neighbourhood plans? In particular:

d) Knutsford: Should the proposed Town Centre boundary be expanded to include room for the town centre to accommodate the forecast growth in convenience goods retail floorspace and to support the housing growth planned for the town to 2030?

- 3.1 We do not consider there is significant scope to alter the Town Centre boundary to accommodate the full scale of retail needs identified in the Council's evidence base. Indeed, there are very limited options to identify sequential in centre or edge of centre sites due to the presence of Tatton Park, which is a Registered Park and Garden to the north and east, surrounding residential development and other important protected green spaces such as the Heath located in other directions.
- 3.2 However, we address one detailed change that we consider should be accommodated under Question 91 which deals with the Oka furniture store which is accommodated in the former Conservative Bowling Club House.

4. ISSUE: PLANNING FOR RETAIL NEEDS (POLICY RET 2)

Question 81 - Do the sites allocated in the LPS, retail opportunities in the Principal Town Centres of Crewe and Macclesfield, and site LPS 47 at Nantwich provide the capacity to deliver the convenience retail floorspace needs of Cheshire East up to 2030? If so, where is the evidence to demonstrate this and that there is sufficient additional floorspace capacity at these sites, which has not already been taken account of in the Retail Study Update, to meet the convenience retail floorspace needs at town level identified in Table 9.2 of the SADPD?

- 4.1 No. These sites and allocations do not address the pressing retail needs arising in Knutsford in relation to convenience goods floorspace, as set out in Table 9.3 of the SADPD, which ranges from 3,600 sq m - 4,300 sq m net by 2030 and represents the highest level of need of all the settlements.
- 4.2 Convenience retail shopping is undertaken by most households on a regular basis whether that be every fortnight, every week or every day. As such, convenience retail provision should be provided as close to where the demand resides in order to promote sustainable travel patterns, whilst respecting the sequential test. Adding further convenience retail supermarkets to Macclesfield, Crewe or Nantwich will not address the high levels of outflow that currently occurs to surrounding towns (which represents an unsustainable pattern of shopping). Indeed, Macclesfield is 12.5 miles away, and Crewe and Nantwich are both over 20 miles away.
- 4.3 The high levels of need in Knutsford are also generated by the relatively high levels of expenditure generated in and around Knutsford by its affluent population. Statistical Tables 1 and 6 in the WYG Retail Study Update illustrate that Zone 2 (which relates to Knutsford and Mobberley) has some of the highest per capita expenditure rates in Cheshire which are typically above national and regional

averages already. This high level of convenience and comparison goods expenditure, along with high levels of visitors attracted to Tatton Park, help to support a very vibrant town centre as referenced by WYG.

- 4.4 The need within Knutsford is also evidenced by the high levels of overtrading in existing convenience supermarkets in Knutsford (see #4.4.3 of the WYG Retail Study Update). Evidence of this overtrading is clearly evident on the ground with car parks at the local Booths store and Aldi store often full and congestion on the shop floor including ques at the tills. The need is also evident by the lack of choice in Knutsford when compared to other Key Service Centres. The only solution to address this need is if additional convenience goods floorspace is proactively planned for as there are no sequentially available sites within or on the edge of the town centre and Green Belt boundaries are tightly drawn around the settlement.

Question 82 - Should further sites be allocated in Macclesfield, Congleton, Knutsford, Middlewich and Nantwich to ensure the retail floorspace needs identified in Table 9.2 of the SADPD for each settlement can be met within the plan period?

- 4.5 Yes, for the reasons set out above under Question 77 and 81. We have consistently asked the Council to explore the opportunity to identify retail allocations in Knutsford to meet the high level of convenience retail need and previously put forward suggestions, but no options appear to have been explored based on the retail evidence and town centre report supporting the SADPD.
- 4.6 We therefore put forward land within Policy LPS 36(C) – NW Knutsford site allocation boundary, where there are a number of options available. We have annotated these on the plan below, which relates to the aforementioned indicative masterplan contained at Appendix 1a of our Regulation 19 representations, which was submitted alongside the application 18/3672M (with a resolution to approve).



- 4.7 **Option 1** relates to the 1ha area of land that will be illustrated on the approved indicative masterplan where the Local Centre is to be located as part of the above application/permission.
- 4.8 **Option 2** comprises of a 1 ha paddock located within the LPS36 allocation boundary but is identified as Protected Open Space under Policy LPS36. However, unlike other protected open space within the allocation, the paddock is not in use for an established sporting club or facility, and it has no means of public access across it. It is just a private field. In line with the designation in Policy LPS36, the aforementioned planning application highlighted that it would become public open space. However, in light of the fact that the SADPD process and Council's retail evidence base continues to confirm a high level of surplus convenience retail needs in Knutsford, we consider that the originally proposed designation can and should be revisited through the SADPD as it is this document that provides detail on the proposals map. The paddock site would make a good location for a new medium sized convenience foodstore (circa +1,000 sqm gross). Whilst it would currently represent an out of centre site in the context of its relationship with Knutsford Town Centre, it is still a relatively short walk away (less than 800m to the town centre boundary) and there would be scope to ensure there are some linked trips between the site and the town centre as the route is not commodious, is flat and there would be scope to provide clear signage and links between the two locations.
- 4.9 A supermarket of this scale would help to retain expenditure generated in Knutsford and alleviate current operational pressures on the Aldi and Booths within Knutsford that are significantly overtrading and would help to support/bolster the delivery of the local retail provision already accounted for under.
- 4.10 **Option 3** is essentially a combination of options 1 and 2 where the range of uses that are to be provided under the approved small Local Centre alongside the medium sized supermarket are combined to create a larger but more comprehensive Local Centre, which could be accommodated entirely within the LPS36 site boundary. This would take up 2 ha of land and under Option 3 the land cited under Option 1 would return to residential use. Allocation of 2ha of land for retail purposes would help to deliver the local retail provision allowed for under Policy LPS 36 and a good proportion of the convenience retail need identified in the Council's retail evidence base and reported in Table 9.3 for Knutsford. It would also contribute to Tatton Estate's aspiration to create a sustainable mixed use development on the site that includes a range of local community uses and not just more, standalone housing.
- 4.11 Alternatively, the 2ha could also be located further north and entirely within the residential part of the allocation (i.e. – an extension of Option 1), which would be consistent with the original application submission that also sought to deliver a local centre, hotel and other commercial uses across 2 ha.
- 4.12 Critically, it is important to note that all of the above options are squarely in line with the NPPF's requirements to deliver sustainable, mixed communities. NPPF paragraph 92 outlines how planning

policies should aim to achieve healthy, inclusive and safe places, which promote social interaction that can be delivered through mixed-use developments with strong neighbourhood centres. Delivering retail development alongside housing will help to promote genuinely sustainable neighbourhoods and reduce environmental impacts in times of climate change emergency/crisis.

Question 83 - Should the proposed local centre within the North Cheshire Garden Village site and those identified as part of other LPS sites, be separately listed in Policy RET 2 as a principal means for meeting the retail floorspace needs of the borough?

- 4.13 We do not object to this so long as the local centre proposed under application reference 18/3672M (Land East of Manchester Road Knutsford) which has a resolution to approve subject to the s106, and is located within the Local Plan NW Knutsford (LPS 36) site, is also listed as a proposed Local Centre or Local Urban Centre under Policy RET 2.
- 4.14 For reasons set out under Question 81, the other strategic sites where local centres are identified will not meet the needs arising in Knutsford and set out in Table 9.3 of the SADPD. Even the proposed North Cheshire Growth Village which is within the north of the Borough is still over 10 miles from Knutsford. Accessing it would require Knutsford residents to pass through Alderley Edge, Wilmslow and Handforth along what are already congested roads. As such, it does not represent a convenient or sustainable location for Knutsford residents to undertake convenience goods shopping trips.
- 4.15 The approved Local Centre within the NW Knutsford (LPS 36) allocation and the additional inclusion of land referenced under Question 82 to deliver a small/medium foodstore would represent a sustainable and accessible location for Knutsford's residents.

5. SEQUENTIAL AND IMPACT TESTS (POLICY RET 3)

Question 84 - As drafted are the sequential and impact tests set out in Policy RET 3 consistent with national policy? Would they be effective in respect of applications for main town centres uses, which accord with site allocations in the LPS, but are located outside of an existing centre?

- 5.1 At present RET 3 is not effective when considering the Strategic Site Allocations. We note that it might not be possible to precisely define the proposed Local Centre locations within the Strategic Allocation sites where applications have either not been built out, approved, or are approved in indicative/outline detail only. However, separate types of annotations on the proposals map would be possible such as a symbol that confirms a broad location to define where new centres have been endorsed in the part 1 plan and/or through subsequent development proposals.
- 5.2 Once such locations are annotated on the plan and listed in Policy RET1, it would be possible to make a minor modification to confirm that the sequential approach and impact assessment will not be applicable to proposals that accord with the strategic site allocation policies.
- 5.3 In the context of NW Knutsford, we have highlighted a specific site that could be allocated for retail purposes to meet some of the town's evidenced convenience retail needs.

Question 85 - Are the impact test thresholds defined in Policy RET 3 justified as appropriate on the basis of proportionate evidence?

- 5.4 Whilst we appreciate this policy is seeking to apply a boroughwide set of thresholds, we do not consider the impact thresholds are justified and are too low across the board.
- 5.5 The NPPF clearly sets a national threshold of 2,500 sq m gross. Whilst we note lower thresholds can be set in local plans, such thresholds should be informed by the vitality and viability of existing centres, the scale of existing retail floorspace within a town, and the level of unmet retailing needs evidenced. All evidence points to Knutsford Town Centre/PSA being very healthy and vibrant. The convenience goods retail need assessment prepared by the Council and summarised in Table 9.2 of the SADPD also confirms that there is a need for 3,600 to 4,300 sq m of convenience goods retail floorspace. This would suggest that even at the national threshold of 2,500 sq m, there is unlikely to be undue significant impacts on Knutsford Town Centre/PSA, particularly bearing in mind that both of the existing food stores within Knutsford are not within the PSA.
- 5.6 A threshold of 1,000 sq m for convenience goods retailing would seem to be more proportionate given the associated needs identified for Knutsford. This threshold could also be applied to Macclesfield, Congleton, Middlewich and Nantwich based on the evidence provided within the SADPD.

Question 86 - Is it clear in criterion 2ii of Policy RET 3 whether or not the assessment of impact on the vitality and viability of any existing centre should include neighbourhood parades of shops?

- 5.7 This criteria should refer to 'defined town centres' rather than 'any existing centre' so as to avoid confusion.

Question 87 - Should criterion 3 of Policy RET 3 be modified to apply the impact test to extensions to edge or out of centre stores, where the floorspace of the extension is below the relevant threshold, but the resultant cumulative floorspace of the store would be above the threshold? Would this be justified and consistent with national policy in safeguarding the vitality and viability of existing centres from the potential loss of anchor tenants?

- 5.8 No comment.

6. RESTAURANTS, CAFES, PUBS AND HOT FOOD TAKEAWAYS (POLICY RET 5)

Question 88 - Is the restriction on the hours of opening of hot food takeaways within 400m of secondary schools and 6th form colleges in criterion 3 of Policy RET 5, justified based on the evidence provided (In particular Core Document ED50) and consistent with national policy? What regard has been given to guidance from local public health services on this issue and to evidence of obesity levels in Cheshire East or the concentrations of hot food takeaway uses within close proximity of secondary schools and colleges?

- 6.1 We do not comment on the general principle / justification of restricting hot food takeaways near schools but do consider that it is important that the exception to this restriction is made in relation designated town centres. Noting previous comments on the status of the Local Urban Centres, there is potentially the need to make a further amendment to this policy to allow hot food take-away in these locations as well.

7. ISSUE: NEIGHBOURHOOD PARADES OF SHOPS (POLICY RET 6)

Question 89: Should criterion 1 of Policy RET 6 seek to protect future neighbourhood parades of shops, where these are proposed within the strategic site allocations in the LPS?

- 7.1 This raises the question over what status each of the proposed centres within the Strategic Allocations have. Many of the local centres/shopping facilities to be provided within the Strategic allocations would have been put forward to make those sites more sustainable or to address specific needs. However, the status of each of the allocated centres at this stage is unclear. As such, a minor amendment could be made to this policy which states:

'The role of existing and new neighbourhood parades of shops to provide facilities that serve a local catchment will be supported, subject to satisfying Policy RET 3.

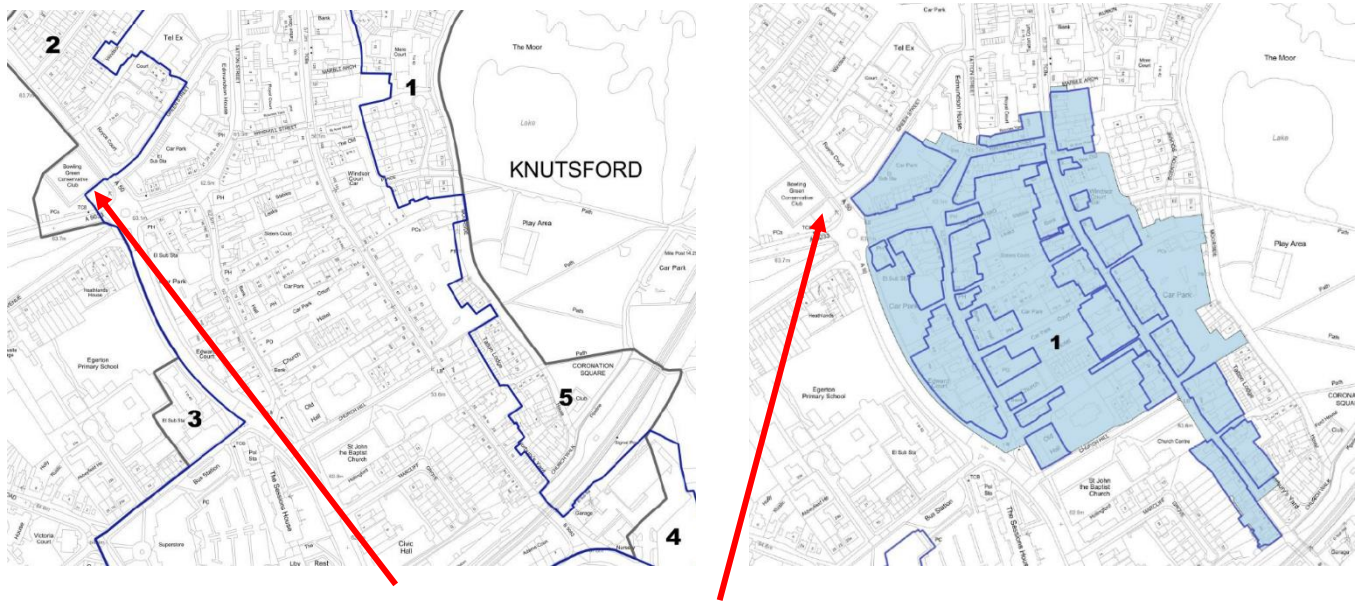
Question 90: Is criterion 2 of Policy RET 6 justified and consistent with national policy in seeking to protect Class E(a) and F2(a) shops within neighbourhood parades of shops? Is it likely to be effective in achieving this given that the 2020 amendments to the Use Classes Order permit changes of use within Classes E and F to other non-retail uses without the need for planning permission?

- 7.2 Criteria 2 will be ineffective given the Use Class Order Permitted Changes, particularly in relation to existing retail floorspace.
- 7.3 The Council could apply a level of control over new retail floorspace permitted and developed through the use of planning conditions removing permitted development rights. Criteria C could be expanded to highlight that the Council might utilise this approach when considering new developments.

8. SUPPORTING THE VITALITY OF TOWN AND RETAIL CENTRES (POLICY RET 7)

Question 91: Are the Primary Shopping Area boundaries for the principal town centres and town centres, and the boundaries for local centres and local urban centres, as defined on the draft Policies Map, justified based on proportionate evidence of the extent of the main shopping frontages?

- 8.1 As part of the SADPD plan the Council are seeking to remove the former Conservative Bowling Club site from the town centre bar the building itself. We object to this. We also object to the omission of this site from the primary shopping area.
- 8.2 The site is located within the existing defined town centre boundary, is located directly opposite a main retailing street, is easily accessible via a pelican crossing and is in an existing retail use.
- 8.3 Whilst the building itself has been retained in the proposed town centre boundary, we consider it is close enough to the primary shopping area to be included within that designation too. The wider bowling green site is also a community use that has a very close relationship to the core of the centre and has always historically formed part of the town centre boundary.



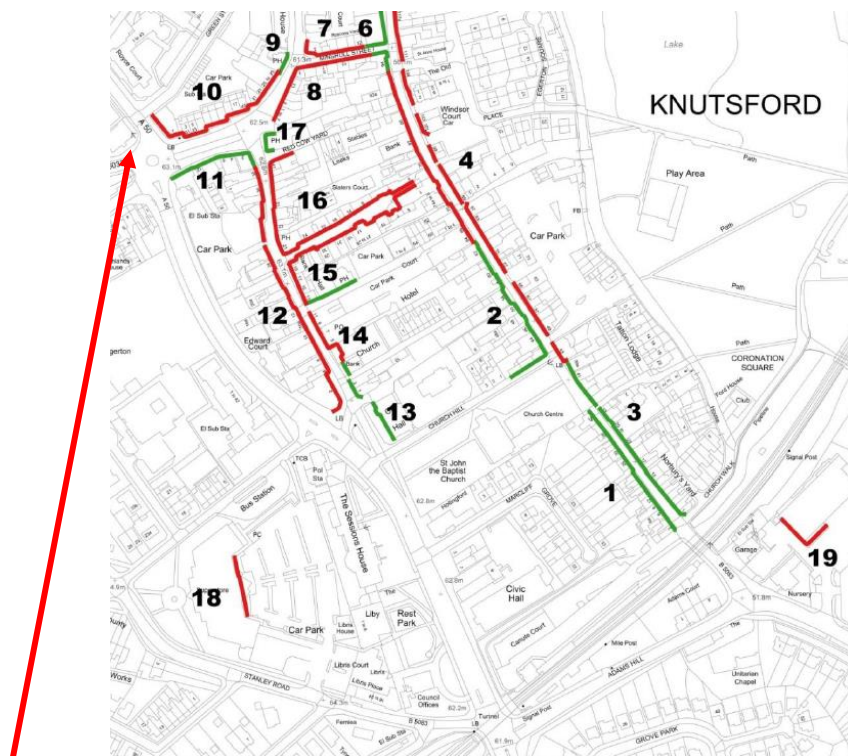
Bowling Green Site and Oka Retail Unit

- 8.4 The Council's justification for removing the entire site from the town centre boundary is out of date and incorrect. The supporting Knutsford Settlement Report (ED34) states the following in Table 5 in relation to the Town Centre boundary and the change in area 2 illustrated on the plan copied on the left-hand site above.

Removal of Royce Court, Elizabeth Gaskell Court and the houses on George Street and the Conservative Club Bowling Green

Justification for Amendment: These residential areas do not function as a part of the town's shopping and service offering.

- 8.5 There is no acknowledgement within the Council's evidence that the Conservative Club Bowling Green building is now in commercial retail use and it is pertinent to note that it has never been in residential use, which is the primary reason to delete the vast majority of area 2 from the current Town Centre boundary.
- 8.6 With regard to the Council's justification for the Primary Shopping Area, this is set out in Table 4 of ED34 where it is stated 'The primary shopping area has been broadly defined to encompass where retail and leisure uses are concentrated in the town centre'. The bowling Green Site is in both retail and leisure use and directly opposite the defined Primary Shopping Area and adopted Primary Retail Frontage as illustrated on the plans at Appendix 2 of ED34. Whilst a road separates the two, that is the case for many parts of the PSA and defined Primary Shopping Frontages.



Bowling Green Site and Oka Retail Unit

Question 92: Is Policy RET 7 consistent with national policy and would it be effective in allowing centres to diversify in response to rapidly changing market circumstances and to allow a suitable mix of uses, including housing?

- 8.7 The policy would benefit by cross referencing RET 8 and the ability to deliver housing within the defined centres.

9. RESIDENTIAL ACCOMMODATION IN THE TOWN CENTRE (POLICY RET 8)

Question 93: Is Policy RET 8 consistent with national policy in supporting housing in the borough's centres as part of a suitable mix of uses to maintain vitality and viability? Should the policy also be applied to local centres and local urban centres?

9.1 No comment.

Question 94: In combination with Policy RET 7, would Policy RET 8 be effective in maintaining the primary shopping and commercial function of existing centres?

9.2 Yes, when considered in the context of RET 9 (clause 5) which seeks to ensure active ground floor frontages are a key design consideration. A cross reference could be applied as a minor modification.

Question 95: In the light of the recent changes which have taken place in town centres and the reduction in demand for retail and commercial floorspace, particularly during the Covid-19 pandemic, is a more radical approach justified to re-allocate some areas of the Borough's centres for housing and reduce pressure on greenfield sites?

9.3 We consider the overall balance of policy aspirations achieved over RET 7, RET 8 and RET 9 is suitable and there isn't a need for a more radical approach in the context of Cheshire East's Town centre.

ISSUE: ENVIRONMENTAL IMPROVEMENTS & DESIGN IN TOWN CENTRES (POLICY RET 9)

Question 96: Does Policy RET 9 serve a clear purpose in addition to the design principles established for all development proposals in Policies SE 1 and GEN 1, and is it consistent with national policy in avoiding unnecessary duplication?

9.4 We have not previously commented on this policy but note that the application of the principles in RET9 (Clause 5) does mean that RET 7 and RET 8 could work in combination and in practice. In short, residential development is supported but there is a focus on ensuring that preserving or providing active commercial, ground floor frontages and high quality public realm areas are a key consideration as part of any application.