

Cheshire East Local Plan

Site Allocations and Development Policies Document

The provision of housing and
employment land and the
approach to spatial distribution
[ED 05]

October 2020

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1. Introduction

- 1.1 This report [ED 05] explains the approach taken towards the provision of housing and employment land in the Revised Site Allocations and Development Policies Document (“SADPD”) taking account of the latest housing and employment monitoring position at 31 March 2020.
- 1.2 The SADPD is the second part of the Local Plan. It is a non-strategic plan prepared to be consistent with the strategic policies of the Local Plan Strategy (“LPS”) and includes, amongst other things, a range of policies to guide planning application decisions and the identification of updated settlement boundaries.
- 1.3 The SADPD allocates a number of additional non-strategic sites for development that will assist in meeting the overall development requirements set out in the LPS. Alongside the LPS, the SADPD provides an appropriate strategy so that the strategic housing and employment needs identified in the LPS are met in full.
- 1.4 This report does not address the provision of safeguarded land at Local Service Centres (“LSCs”), Gypsy and Traveller and Travelling Showpeople accommodation or retail development. Further information about these matters can be found in the Local Service Centres Safeguarded Land Distribution Report [ED 53], the Gypsy, Traveller and Travelling Showpeople Site Selection Report [ED 14] and the Cheshire East Retail Study [ED 17].
- 1.5 All documents referred to with the “ED” prefix are available to view in the Revised Publication Draft SADPD consultation library.

2. Background

- 2.1 LPS Policy PG 1 “Overall Development Strategy” established the requirement for new housing and employment land in the borough between 2010 and 2030 namely; 36,000 dwellings and 380 hectares of land for business, general industrial and storage and distribution.
- 2.2 This represented an ambitious level of growth predicated on the assumption that there will be a 0.7% increase in the number of jobs within the borough in each year throughout the Plan period.
- 2.3 The adopted housing requirement of 36,000 new dwellings, equivalent to an annual average of 1,800 dwellings per annum, is currently higher than the figure of 1,068 new dwellings per annum calculated using the standard method¹.
- 2.4 In order to ensure that housing and employment needed is directed to the most sustainable locations, LPS Policy PG 2 “Settlement Hierarchy” defines the settlement hierarchy for the borough. This comprises Principal Towns (“PTs”) (Crewe and Macclesfield); Key Service Centres (“KSCs”) (nine named settlements); Local Service Centres (“LSCs”) (13 named settlements) and Other Settlements and Rural Areas (“OSRA”) (individual settlements not named).
- 2.5 Indicative levels of new housing and employment land for each of the named PTs and KSCs are provided together with the LSC and OSRA tiers as a whole. LPS Policy PG 7 “Spatial Distribution of Development” sets out how the development anticipated by LPS Policy PG 1 should be generally distributed in order to meet borough-wide housing and employment requirements.
- 2.6 The LPS (¶8.73) states that all figures for each settlement or tier are provided as a guide and are neither a ceiling nor target. Taking account of completions since 2010 and commitments, provision will be made to allocate sufficient sites, through the LPS and/or SADPD to facilitate the levels of development ‘in the order’ of the expected levels set out in LPS Policy PG 7.
- 2.7 LPS Policy PG 7 indicates that the majority of new housing and employment development will be met in the higher order PTs and KSCs. Together PTs and KSCs are expected to accommodate in the order of 25,300 new dwellings or 82% of the overall housing requirement of 36,000 new dwellings. The same applies to employment land: PTs and KSCs being expected to provide 304 hectares of employment land or 80% of the overall employment land requirement. PTs and KSCs are the most sustainable locations for growth. Development in these locations best enables dwellings, jobs and other facilities to be located close to each other.

¹ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

- 2.8 Indicative levels are also provided for new housing and employment land for the LSC and OSRA tiers of the settlement hierarchy. For housing, the LSC tier is expected to accommodate in the order of 3,500 new dwellings, which is 9.7% of the overall housing requirement and for the OSRA, 2,950 new dwellings or 8.1% of the housing requirement.
- 2.9 For employment, LSCs are expected to provide 7 hectares of employment land or 1.8% of the overall employment land requirement. In the OSRA, 69 hectares of employment land is anticipated or 18.2% of the overall requirement (the majority to be delivered through one very large employment site: Wardle Employment Improvement Area (reference LPS 60)).

3. Housing land supply and delivery

Introduction

- 3.1 The LPS reflects the housing monitoring position at the 31 March 2016. The LPS takes account of completions since 2010, commitments and allocations in order to facilitate the overall levels of housing development envisaged by LPS Policy PG 1, namely a minimum of 36,000 new dwellings over the plan period.
- 3.2 The SADPD is being prepared half-way through the plan period and takes account of the housing land supply position at 31 March 2020. Further details can be found in the housing completions and supply information published on the council's website² and in Appendix 1: Housing land position (at 31 March 2020).
- 3.3 This chapter identifies the changes in housing delivery and supply that have taken place since the LPS was adopted. Both supply and delivery have increased, including through windfall development. This context informs the approach taken towards the provision of additional housing land in the SADPD considered further in Chapter 4.

2016 housing monitoring position

- 3.4 The LPS reflects the housing monitoring position at the 31 March 2016 and this is summarised in Table 1.

Housing Land Supply	Net dwellings
Completions 01/04/10-31/3/2016	5,473
Supply (sites with planning permission and allocated sites)	29,377
Small sites windfall allowance for remaining years of the plan period	1,375
Sub total	36,225
Contribution to be made through the SADPD	3,335
TOTAL	39,560

Table 1: Housing Supply at 31 March 2016³

²

<https://www.cheshireeast.gov.uk/pdf/planning/spatial-planning/researchand-evidence/housing-monitoring-report/hmu-2019-20-completions-supply.pdf>

³ Source: LPS Table 8.2

- 3.5 Supply at the 31 March 2016 was 39,560 dwellings including the contribution to be made through the SADPD or 36,225 without. Of this supply, 5,473 dwellings had been completed.

2020 housing monitoring position

- 3.6 The SADPD reflects the housing monitoring position at the 31 March 2020 and this is summarised in Table 2.

Housing Land Supply	Net dwellings
Completions 01/04/10-31/3/2020	15,683
Supply (sites with planning permission and allocated sites)	24,437
Small sites windfall allowance for remaining years of the plan period	875
Sub total	40,995
Contribution to be made through the SADPD	275
Total	41,270

Table 2: Housing Land Supply at 31 March 2020

- 3.7 Supply at the 31 March 2020 is 41,270 dwellings including the contribution to be made from sites allocated in the SADPD (275 dwellings) or 40,995 without. Of this supply, 15,683 dwellings have been completed. In the 4 year period between 1 April 2016 and 31 March 2020, 10,210 homes have been completed in the borough, nearly twice the number of homes completed in the first six years of the Plan period.

Changes in plan flexibility

- 3.8 As Tables 1 & 2 show, supply exceeded the housing requirement of 36,000 new dwellings at both the 31 March 2016 and at 31 March 2020. When overall supply exceeds the requirement, this is referred to as “flexibility”.
- 3.9 The LPS does not contain any policies that prescribe an additional level of flexibility to be added to the overall housing requirement. Local Planning Authorities may apply an additional level of flexibility as this increases the likelihood that the housing requirement will be met in full over the plan period, taking account of any fluctuations in market conditions or changes in site circumstances.

Flexibility at 31 March 2016

- 3.10 Table 1 below shows that housing supply at the 31 March 2016 was 39,560 dwellings (including the contribution of 3,335 dwellings to be made through the SADPD). Total supply was +3,560 dwellings over and above the housing requirement of 36,000 new dwellings. Table 3 below shows that this equated to a level of flexibility of 9.9%.
- 3.11 Supply without sites to be allocated in the SADPD was 36,225 dwellings. This is +225 dwellings over and above the housing requirement of 36,000 new dwellings. Table 4 below shows that this equated to a level of plan flexibility of 0.6%.

Flexibility at 31 March 2020

- 3.12 Table 2 below shows that housing supply at the 31 March 2020 was 41,270 dwellings (including the contribution of 275 dwellings to be made through the SADPD). Total supply is +5,270 dwellings over and above the housing requirement of 36,000 new dwellings. Table 3 below shows that flexibility has risen from 9.9% in 2016 to 14.6% by 31 March 2020.
- 3.13 Supply without the contribution made from the SADPD is 40,995 dwellings. This is +4,995 dwellings over and above the housing requirement of 36,000 new dwellings. Table 4 below shows that flexibility (without the contribution to be made in the SADPD) has risen from 0.6% in 2016 to 13.9% by 31 March 2020.

Date	LPS Expected level of development	Completions (2010+)	Supply (sites with planning permission and allocated sites)	Contribution to be made in the SADPD	Small sites windfall allowance for remaining years of the plan period	Total	% Flexibility
31-Mar-16	36,000	5,473	29,377	3,335	1,375	39,560	9.9%
31-Mar-18		9,556	28,866	665	1,125	40,212	11.7%
31-Mar-20		15,683	24,437	275	875	41,270	14.6%

Table 3: Flexibility (with contribution to be made in the SADPD)

Date	LPS expected level of development	Completions (2010+)	Supply (sites with planning permission and allocated sites)	Small sites windfall allowance for remaining years of the plan period	Total dwellings	% flexibility
31-Mar-16	36,000	5,473	29,377	1,375	36,225	0.6%
31-Mar-18		9,556	28,866	1,125	39,547	9.9%
31-Mar-20		15,683	24,437	875	40,995	13.9%

Table 4: Flexibility (without contribution to be made in the SADPD)

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Flexibility – dwellings left to be built

3.14 Table 5 below shows that there has been a significant uplift in completions since the LPS was adopted.

Year	Net Completions
2010/11	659
2011/12	778
2012/13	614
2013/14	713
2014/15	1,236
2015/16	1,473
2016/17	1,762
2017/18	2,321
2018/19	3,062
2019/20	3,065
TOTAL	15,683

Table 5: Net housing completions since the start of the plan period.

- 3.15 The number of dwellings completed (15,683) reduces the number of dwellings left to be built over the remaining years of the plan period (now 20,317) in order to meet 36,000.
- 3.16 Arguably the concept of flexibility should not apply to the dwellings already completed between 2010 and 2020. They are a guaranteed part of the housing supply. If flexibility is calculated based on the number of dwellings left to be built over the plan period, supply flexibility increases further.

31 March 2016

- 3.17 Table 6 below shows that at the 31 March 2016, 5,473 dwellings had been completed, leaving 30,527 new dwellings left to be completed in order to reach 36,000.
- 3.18 Supply including the contribution from sites to be made in the SADPD (excluding completions) was 34,087 dwellings. This exceeded the number of dwellings left to be built over the remaining years of the plan period (30,527 dwellings) by +3,560. This equated to a level of flexibility of 11.7%.
- 3.19 Table 7 below shows that supply without the contribution to be made in the SADPD (excluding completions) was 30,752 dwellings. This exceeded the number of dwellings left to be built over the remaining years of the plan period (30,527 dwellings) by +225. This equated to a level of flexibility of 0.7%

31 March 2020

- 3.20 Table 6 below shows that at the 31 March 2020, 15,683 dwellings had been completed, leaving 20,317 dwellings left to be completed in order to reach 36,000.
- 3.21 Supply including the contribution from sites to be made in the SADPD (excluding completions) was 25,587 dwellings. This exceeds the number of dwellings left to be built over the remaining years of the plan period (20,317) by + 5270 dwellings. Flexibility has risen from 11.7% in 2016 to 25.9% by 31 March 2020.
- 3.22 Table 7 shows that supply without the contribution to be made in the SADPD (excluding completions) is 25,312 dwellings. This exceeds the number of dwellings left to be built over the remaining years of the plan period (20,317) by +4,995 dwellings. Flexibility has risen from 0.7% in 2016 to 24.6% by 31 March 2020.

Flexibility summary

- 3.23 Total housing supply flexibility is now significantly higher than existed upon adoption of the LPS. Specifically, the overall housing supply, at 31 March 2020, including the contribution to be made in the SADPD is 25.9% higher than the number of remaining dwellings that need to be built in order to achieve the LPS requirement of 36,000 dwellings. It means that even if 1 in 5 of the dwellings did not come forward, the Local Plan's ambitious housing target would still be met. This represents a very robust housing supply position with 10 years of the Plan period remaining.

Date	LPS Expected level of development	Completions (1.4.2010+)	Remaining expected level of development (minus completions)	Supply: sites with planning permission and allocated sites	Supply: Contribution to be made in SADPD	Supply: Small sites windfall allowance for remaining years of the plan period	Total Supply (minus completions)	% flexibility
31-Mar-16	36,000	5,473	30,527	29,377	3,335	1,375	34,087	11.7%
31-Mar-18		9,556	26,444	28,866	665	1,125	30,656	15.9%
31-Mar-20		15,683	20,317	24,437	275	875	25,587	25.9%

Table 6: Remaining expected levels of development and flexibility (including contribution made in the SADPD)

Date	LPS Expected level of development	Completions (1.4.2010+)	Remaining expected level of development (minus completions)	Supply: sites with planning permission and allocated sites	Supply: Small sites windfall allowance for remaining years of the plan period	Total supply (mins completions)	% flexibility
31-Mar-16	36,000	5,473	30,527	29,377	1,375	30,752	0.7%
31-Mar-18		9,556	26,444	28,866	1,125	29,991	13.4%
31-Mar-20		15,683	20,317	24,437	875	25,312	24.6%

Table 7: Remaining expected levels of development and flexibility (without contribution made in SADPD)

Windfall

- 3.24 Annex 2 of the NPPF defines windfall development as ‘sites not specifically identified in the development plan’.
- 3.25 Since the start of the plan period, 15,683 dwellings have now been completed. This includes 1,719 dwellings on sites allocated in the development plan and 13,964 dwellings on non-allocated sites (i.e. windfall sites).

Small sites windfall

- 3.26 Included within housing supply is a windfall allowance for small sites (up to 9 dwellings excluding residential gardens). The allowance of 125 dwellings per annum (excluding Crewe and Macclesfield) is applied from year 4 onwards to avoid double counting existing commitments. The allowance was endorsed through the examination of the LPS and was based on the average number of dwellings completed on these sites between 1 April 2009 and the 31 March 2016.
- 3.27 Since the allowance was set in 2017, the average number of housing completions on small sites has risen. The allowance is looking very cautious compared to delivery rates.
- 3.28 Table 8 shows that since the start of the plan period, small site windfall delivery (1,765 dwellings) excluding Crewe and Macclesfield, has averaged 177 dwellings per annum. However this figure is skewed by low completions since the start of the plan period. Over the previous 5 years, small sites windfall has averaged 238 dwellings per annum.
- 3.29 It is reasonable to assume that additional supply from small sites will continue to come forwards over the remaining years of the plan period and having regard to past delivery trends, delivery on small windfall sites is likely to exceed the allowance applied.

Year	Cheshire East	Crewe	Macclesfield	Cheshire East (excluding Crewe and Macclesfield)
2010/11	172	30	19	123
2011/12	173	38	20	115
2012/13	204	39	45	120
2013/14	173	56	25	92
2014/15	194	35	34	125
2015/16	297	44	41	212
2016/17	303	35	53	215
2017/18	320	44	38	238
2018/19	426	54	62	310
2019/20	304	35	54	215
TOTAL	2,566	410	391	1,765
Annual Average 2010-20	257	41	39	177
Annual Average 2015-20	330	42	50	238

Table 8: Small Sites Windfall (9 dwellings or less excluding residential gardens)

Five year housing land supply

- 3.30 The latest published five year housing land supply assessment can be found in the Cheshire East Annual Housing Monitoring Update (base date 31 March 2019) (“HMU”)⁴.
- 3.31 The HMU identifies a specific deliverable supply of 17,733 dwellings, sufficient to provide 7.5 years’ worth of housing against the housing requirement set out in the LPS.
- 3.32 The findings of the HMU have been subject to recent consideration in the recovered appeal ‘Land off Audlem Road/ Broad Lane, Stapeley, Nantwich’⁵. In his decision letter dated the 15th July 2020, the Secretary of State confirmed that the council can demonstrate a deliverable housing land supply in excess of 5 years. The annual five year housing land supply assessment will be updated to a 31 March 2020 base date in due course.
- 3.33 In terms of housing delivery, the Housing Delivery Test is the measure against which delivery performance is assessed. The Housing Delivery Test: 2019 Measurement⁶ was published in February 2020 and confirmed that the number of homes delivered in Cheshire East exceeded the number of homes required (using the standard method) by 230%. No urgent action is therefore required to address under-delivery.
- 3.34 Confirmation of the existence of 5 year housing land supply is not sought through the examination of the SADPD.
- 3.35 Paragraphs 67 and 73 of the NPPF indicate that strategic plans should consider land availability and policies should identify specific deliverable housing sites for years 1-5 of the plan period, developable sites or broad locations for years 6-10 and where possible, for years 11-15 of the plan. Strategic plans should include a trajectory illustrating the expected rate of housing delivery over the plan period.
- 3.36 National Planning Policy Guidance: ‘How can an authority demonstrate a 5 year supply of deliverable housing sites?’ states that for plan-making, strategic policies should identify a five year housing land supply from the intended date of adoption.
- 3.37 The SADPD is a non-strategic plan, prepared to be consistent with the strategic policies of the LPS. Any review of the strategic housing requirement and those LPS policies that allocate strategic sites for housing is a matter for

⁴ www.cheshireeast.gov.uk/planning/spatial_planning/research_and_evidence/strategic_housing_land_assmnt/housing-monitoring-update.aspx

⁵ APP/R0660/A/13/2197532 & APP/R0660/A/13/2197529

⁶ <https://www.gov.uk/government/publications/housing-delivery-test-2019-measurement>

annual monitoring and/or review of that plan. There is no requirement to reconsider these matters or to confirm the existence of a 5 year housing land supply via the examination of the SADPD.

4. The approach taken towards the provision of housing land and spatial distribution in the SADPD

Introduction

- 4.1 As set out in ¶3.7 overall housing supply has continued to increase since the LPS was adopted and there is now a very healthy overall supply of 41,270 dwellings (including the contribution of 275 dwellings to be made through the allocation of sites in the SADPD).
- 4.2 With this context in mind, this chapter considers the approach taken towards the provision of housing land in the SADPD.

Principal Towns

- 4.3 LPS Policy PG 7 indicates that the PTs are expected to accommodate 'in the order of' 11,950 new dwellings over the plan period or 33% of the overall housing requirement of 36,000 new dwellings. PTs are the most sustainable locations for growth and development in these locations best enables dwellings, jobs and other facilities to be located close to each other.
- 4.4 Table 9 shows that at the 31 March 2020, housing supply in the two PTs of Crewe and Macclesfield is 8,995 dwellings and 4,932 dwellings compared to an expected level of development of 7,700 dwellings and 4,250 dwellings respectively.
- 4.5 Total supply for the PTs is 13,927 dwellings, this is +1,977 dwellings over the expected levels of development of 11,950 dwellings. Of this supply, 4,201 dwellings have now been completed.

Area	LPS Expected level of development	Completions	Commitments	Allocations (without permission)	Total
Crewe	7,700	2,668	4,271	2,056	8,995
Macclesfield	4,250	1,533	2,868	531	4,932
All PTs	11,950	4,201	7,139	2,587	13,927

Table 9: Housing supply in the Principal Towns

- 4.6 Supply exceeding indicative expected levels of development for PTs is reflective of the plan strategy of directing the majority of all new housing and

employment development to the borough's PTs and KSCs as the most sustainable locations for growth.

- 4.7 That expected levels of development for both of the two PTs have been met and no further housing allocations are proposed in the SADPD.
- 4.8 Furthermore, the significantly increased level of flexibility in the overall housing supply (41,270 dwellings) provides confidence that the overall housing requirement of 36,000 dwellings will be met in full over the plan period.

Key Service Centres

- 4.9 LPS Policy PG 7 indicates that the KSCs are expected to accommodate 'in the order of' 17,600 new dwellings over the plan period or 49% of the overall housing requirement of 36,000 new dwellings. KSCs are amongst the most sustainable locations for growth and development in these locations best enables dwellings, jobs and other facilities to be located close to each other.
- 4.10 Table 10 below shows that at the 31 March 2020, housing supply across the 9 KSCs is 19,617 dwellings (without the contribution of +275 dwellings to be made in the SADPD). Supply now exceeds the LPS expected level of development for KSCs as a whole by +2,017 dwellings or 11%. Of this supply, 7,770 dwellings have now been completed.
- 4.11 Housing supply across the majority of the KSCs now meets and exceeds the expected levels of development for each named settlement. The only exceptions to this are the towns of Middlewich, Poynton and Handforth.
- 4.12 In considering whether additional housing sites should be allocated in these settlements, account has been taken of the LPS strategy, which directs the majority of employment and housing growth to the highest tiers of the settlement hierarchy in order to maximise use of existing infrastructure and resources.

Area	LPS Expected level of development	Completions	Commitments	Allocations (without permission)	Total
Alsager	2,000	845	1,253	178	2,276
Congleton	4,150	1,833	2,523	630	4,986
Handforth	2,200	141	494	1,500	2,135
Knutsford	950	88	804	225	1,117
Middlewich	1,950	672	925	200	1,797
Nantwich	2,050	1,307	950	97	2,354
Poynton	650	123	439	0	562
Sandbach	2,750	2180	1089	25	3,294
Wilmslow	900	581	515	0	1,096
All Key Service Centres	17,600	7,770	8,992	2,855	19,617

Table 10: Housing supply in the Key Service Centres (without contribution from allocated sites in the SADPD).

Middlewich

- 4.13 The focus for Middlewich is boosting economic growth. Its position adjacent to the M6 Motorway makes it a particularly attractive location for future investment, particularly logistics. Middlewich is expected to accommodate the highest amount of employment land of any of the Borough's settlements – 'in the order of' 75 hectares, including a major employment allocation – Midpoint 18.
- 4.14 To support the levels of economic growth planned in Middlewich and also to improve the vitality of the town centre, the town is expected to accommodate 'in the order of' 1,950 dwellings over the plan period. Housing land supply in Middlewich at the 31 March 2020 is 1,797 dwellings, of which 672 dwellings have been completed and 1,125 dwellings are committed but not yet built.

This is 153 dwellings below the expected level of development of 'in the order of' 1,950 dwellings.

- 4.15 Following the Site Selection Methodology [ED 07] ("SSM"), the Middlewich Settlement Report [ED 36] assessed all sites put forward for housing for their possible inclusion in the SADPD. The SSM process resulted in the recommendation of two sites for residential development – CFS 600: East and West Croxton Lane and CFS 635A: Centurion Way. Together these two sites could provide an additional 125 additional dwellings for the town.
- 4.16 When these sites are added to existing supply of 1,797 dwellings, this results in the provision of 1,922 dwellings. This is very close to the LPS expected level of development of 'in the order of' 1,950 dwellings' for this town.
- 4.17 It is also considered relevant that many settlements in the KSC tier, such as Sandbach which lies very close to Middlewich, have now significantly exceeded their expected level of development (by 544 dwellings in the case of Sandbach). Completions and commitments for Sandbach and the Rural area include the former Albion Chemical Works, Booth Lane, Moston (537 dwellings) which is located between Sandbach and Middlewich.
- 4.18 Having regard to the above factors and in the absence of any other sites that performed well in the SSM process, the planned provision of new dwellings at Middlewich, being 'in the order' of 1,950 new dwellings, is consistent with the LPS.

Poynton

- 4.19 The focus for Poynton over the plan period is of high quality housing led growth to accommodate the growing needs of the town. Poynton is expected to accommodate in the order of 10 hectares of employment land and 650 new dwellings.
- 4.20 Housing land supply in Poynton at the 31 March 2020 is 562 dwellings, compared to the LPS expected level of development of 'in the order of' 650 new dwellings. There is a difference of 88 dwellings between these figures.
- 4.21 Following the SSM and the iterative assessment approach, the Poynton Settlement Report [ED 39] has assessed all sites put forward for housing for their possible inclusion in the SADPD.
- 4.22 The SSM process has resulted in the recommendation of three sites for residential development: CFS 109: Poynton Sports Club (80 dwellings); CFS 636: Poynton High School (20 dwellings) and CFS 637: Former Vernon Infants School (50 dwellings).
- 4.23 Together these sites make provision for 150 dwellings. When added to existing supply (562 dwellings) this results in the provision of 712 dwellings. While this marginally exceeds the expected level of development of 'in the order of' 650 new dwellings by 72 dwellings, these figures are a guide and are not a ceiling or target.

- 4.24 In the case of Poynton, it is relevant that all three sites are located in highly sustainable locations and within the existing Poynton settlement boundary where the development of new housing is acceptable, in principal, subject to the application of other, general development management policies. Notably, each of the three sites will facilitate the provision of improved sports provision within the town and the allocation of these sites will, importantly, enable a policy framework to be put in place to ensure that the associated benefits are secured.

Handforth

- 4.25 The strategy for Handforth over the LPS period is to provide a significant number of new dwellings in a high-demand residential area, with high-quality employment growth reflecting the North Cheshire Science Corridor and the area's locational advantages close to key transport routes, the Greater Manchester conurbation and the Airport City Enterprise Zone whilst delivering improved infrastructure, services and facilities.
- 4.26 In addition to providing land to meet its own development requirements, Handforth is the location for a new settlement (North Cheshire Growth Village, Handforth East, reference LPS 33, and now referred to as The Garden Village at Handforth) to assist in meeting development needs arising across the northern sub-area of the borough.
- 4.27 Housing land supply in Handforth at the 31 March 2020 is 2,135 dwellings, compared to the LPS expected level of development of 'in the order of' 2,200 new dwellings. The Handforth Settlement Report [ED 31] confirms that this difference of 65 dwellings is considered to be 'in the order of' 2,200.
- 4.28 In addition, the overall 'in the order of' figure for Handforth includes provision for the new settlement, which will assist in meeting development needs arising in other towns across the northern sub-area of the borough (Macclesfield, Knutsford, Poynton and Wilmslow). Because these towns now collectively exceed their 'in the order of' figures, it is not considered necessary to make further allocations in Handforth because an element of its overall 'in the order of' figure will now be met by the extra provision within those settlements where the development needs arise

Local Service Centres

- 4.29 LPS Policy PG 7 indicates that LSCs are expected to accommodate 'in the order of' 3,500 new dwellings over the plan period. Expected levels of development are not disaggregated further to the individual settlements in the LSC tier.
- 4.30 LSCs are expected to accommodate lower levels of development than PTs and KSCs reflective of their position in the settlement hierarchy and the figure of 'in the order of' 3,500 dwellings equates to 9.7% of the overall housing requirement of 36,000 dwellings.

4.31 Table 11 below shows that at the 31 March 2020, total housing supply across the LSCs is 3,210 dwellings. Of this supply, 2,007 dwellings had been completed.

Area	LPS Expected level of development	Completions	Commitments	Allocations (without permission)	Total
Alderley Edge	3,500	90	75	0	165
Audlem		172	52	0	224
Bollington		198	141	0	339
Bunbury		52	56	0	108
Chelford		124	79	0	203
Disley		197	34	0	231
Goostrey		11	1	0	12
Haslington		247	240	0	487
Holmes Chapel		553	318	0	871
Mobberley		9	2	0	11
Prestbury		51	31	0	82
Shavington		222	143	0	365
Wrenbury		81	21	10	112
All Local Service Centres		2,007	1,193	10	3,210

Table 11: Housing supply in the Local Service Centres

- 4.32 Housing supply of 3,210 dwellings is now 290 dwellings below the LPS indicative level of development of 3,500 dwellings but it is 92% of it and is therefore considered to lie 'in the order' of 3,500 dwellings.
- 4.33 As set out above, the LPS Policy PG 7 figure of 'in the order of' 3,500 dwellings equates to 9.7% of the overall housing requirement of 36,000 whereas a supply of 3,210 dwellings equates to 8.9% of it. The difference between the two now equates to less than 1% of the overall housing requirement.
- 4.34 In considering whether or not to allocate further sites for housing at LSCs and/or disaggregate expected levels of development to individual settlements, various factors have been taken account. These include the overall context of increased housing supply and delivery borough-wide (see Chapter 3) and at the LSC tier. It also is recognised that the allocation of further sites at LSCs may require Green Belt release and exceptional circumstances to do so would have to be demonstrated.

Housing supply

- 4.35 Table 12 shows that LSC housing supply has continued to rise since the LPS was adopted. At 31 March 2016, supply was 2,624 dwellings. This had risen to 3,210 dwellings by 31 March 2020 including an allocation made in a Neighbourhood Development Plan. Overall supply has risen by 22% since 2016.

Year	Net completions	Commitments	Neighbourhood Plan Allocations (without planning permission)	Total	% change
31-Mar-16	568	2056	0	2,624	-
31-Mar-18	1,084	2010	0	3,094	+18%
31-Mar-20	2,007	1,193	10	3,210	+22%

Table 12: Housing supply at LSCs

Housing delivery

- 4.36 In the first 10 years of the 20 year plan period, 2,007 or 57.3% of the LSC expected level of development of 'in the order of' 3,500 dwellings has now been completed through sites not specifically identified in the development plan (i.e. windfall sites).
- 4.37 Table 13 below provides a summary of net completions across the LSC tier since the start of the plan period. Over the past five years, completions have averaged 339 dwellings per annum.

Year	Net completions at LSC's
2010-11	30
2011-12	79
2012-13	0
2013-14	62
2014-15	139
2015-16	258
2016-17	155
2017-18	361
2018-19	505
2019-20	418
LSC TOTAL	2,007
Annual average 2010-2020	201
Annual average 2015-2020	339

Table 13: Completions across LSCs since the start of the plan period

- 4.38 It is acknowledged that a proportion of these completions over the last 5 years will flow from planning permissions that were granted prior to the adoption of the LPS and/ or at a time when the council was unable to demonstrate a five year housing land supply. However if a longer timeframe is applied from the start of the plan period, this enables fluctuations in the market to be taken into account such as low delivery rates in the early years of plan period. Average completions across LSCs since 2010 equates to 201 dwellings per annum.
- 4.39 Housing completions have taken place across all LSCs, including those affected by Green Belt and this is shown in Table 14.

Area	Net completions 2010-20	As % of completions in LSCs
Alderley Edge	90	4.48%
Audlem	172	8.57%
Bollington	198	9.87%
Bunbury	52	2.59%
Chelford	124	6.18%
Disley	197	9.82%
Goostrey	11	0.55%
Haslington	247	12.31%
Holmes Chapel	553	27.55%
Mobberley	9	0.45%
Prestbury	51	2.54%
Shavington	222	11.06%
Wrenbury	81	4.04%
All Local Service Centres	2,007	100%

Table 14: Net completions 2010-2020 by LSC Settlement

Small sites windfall

- 4.40 A proportion of the completions in Table 14 comprise of small sites windfall development (see ¶3.36-3.31 for details of the LPS small sites windfall allowance and overall delivery). These are sites of 9 dwellings or less (excluding residential gardens).
- 4.41 Table 15 below shows that 286 dwellings have been delivered as small sites windfall across the various settlements in the LSC tier since the start of the plan period or an average of 27 dwellings per year.
- 4.42 Having regard to past trends, it is reasonable to assume that further small sites windfall will take place across LSCs in the future, contributing to LSC housing supply. If the average rate of windfall housing delivery at LSCs was repeated to 2020, this would add an additional 189 homes to the LSC housing supply (27 homes x 7 years).

Area	Completions on small sites (9 or less excluding gardens) (1 April 2010 – 31 March 2020)	All completions (1 April 2010 – 31 March 2020)
Alderley Edge	76	90
Audlem	10	172
Bollington	49	198
Bunbury	12	52
Chelford	2	124
Disley	36	197
Goostrey	11	11
Haslington	17	247
Holmes Chapel	13	553
Mobberley	9	9
Prestbury	38	51
Shavington	10	222
Wrenbury	3	81
All Local Service Centres	286	2,007
Annual average 2010-2020	27	201

Table 15: Small sites windfall in LSCs

Green Belt considerations

- 4.43 The LPS made a number of alterations to Green Belt boundaries to allocate sites for development and to identify safeguarded land.
- 4.44 LPS ¶8.48 confirms that *“the importance of allocating land to go some way to meeting the identified development needs in the north of the borough, combined with the consequences for sustainable development of not doing so, constitutes the exceptional circumstances required to justify alteration of the existing detailed Green Belt boundaries, whilst maintaining the overall general extent of the Green Belt”*.
- 4.45 It is intended that, together, the LPS and SADPD will ensure that the levels of development expected by the LPS can be met in full during the plan period. LPS Policy PG 3 ‘Green Belt’ lists all the areas of land removed from the Green Belt upon adoption of the LPS in 2017 and in advance of the preparation of the SADPD, criterion 6 of LPS Policy PG 3 highlights that *“in addition to these areas listed for removal from the Green Belt, it may also be necessary to identify additional non-strategic sites to be removed in the SADPD”*.
- 4.46 In association with its LPS Policy PG 2 ‘Settlement Hierarchy’, the LPS includes a vision for local service centres. This states: *“In the Local Service Centres, some modest growth in housing and employment will have taken place to meet locally arising needs and priorities, to reduce the level of out-commuting and to secure their continuing vitality. This may require small scale alterations to the Green Belt in some circumstances.”* The explanation text (para 8.30) clarifies that these small scale alterations *“will be pursued as necessary through the Site Allocations and Development Policies Document.”*
- 4.47 The Inspector’s Final Report into the LPS Examination⁷ also provides some context for consideration of Green Belt through the SADPD. The exceptional circumstances as stated in the Inspector’s final report (¶94) are *“based on the need to allocate sufficient land for market and affordable housing and employment development, combined with the adverse consequences for patterns of sustainable development of not doing so, since it is not practicable to fully meet the assessed development needs of the area without amending Green Belt boundaries.”*
- 4.48 With respect to further releases, the Inspector clarifies that *“I also understand that the SADPD will consider the possibility of identifying further smaller scale releases of land from the Green Belt, if exceptional circumstances can be demonstrated, in line with the site-selection methodology”* (¶97) and *“CEC also confirms that the SADPD will consider the need to provide a modest amount of Safeguarded Land at the LSCs, if necessary, in line with the spatial distribution of Safeguarded Land envisaged in the supporting evidence”* (¶102).

⁷ <https://www.cheshireeast.gov.uk/pdf/planning/spatial-planning/celps-inspectors-final-report.pdf>

- 4.49 As set out in the NPPF (¶136), Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plan. The need for any changes to Green Belt boundaries should be established through strategic policies.
- 4.50 The exceptional circumstances are fully set out and justified in the LPS evidence base, and summarised in ¶¶8.42 to 8.49 of the LPS. NPPF ¶136 also states that where strategic policies have established a need for changes to Green Belt boundaries, detailed amendments to those boundaries can be through non-strategic policies.
- 4.51 Whilst the LPS strategic policy allows for the SADPD non-strategic policies to make further detailed amendments to the Green Belt boundary, it does not require it to do so.
- 4.52 As set out in Chapter 3, the SADPD is being prepared in the context of increased housing supply and delivery. There is a duty to consider whether the exceptional circumstances identified in the preparation of the LPS still exist to justify further detailed boundary amendments in the SADPD.
- 4.53 As set out above, housing supply in LSCs is now close to expected levels of development for this tier and is considered to be ‘in the order of’ 3,500 dwellings. And given past trends, it is expected that further windfall housing will come forwards over the remaining years of the plan period over and above the current housing supply comprising completions, commitments and neighbourhood Plan allocation.
- 4.54 In addition to facilitating overall housing land delivery, the exceptional circumstances previously identified through the LPS also included enabling sustainable patterns of development by identifying land to go “some way” to meeting the identified development needs in the north of the borough, whilst recognising that a proportion of development needs arising in Green Belt areas were channelled to locations beyond the Green Belt.
- 4.55 An analysis of the ‘in the order of’ figures for the PTs and KSCs in LPS Policy PG 7 shows that 30.3% of new dwellings are intended to be provided in settlements inset within the North Cheshire Green Belt, whilst 69.7% are intended to be provided in settlements beyond the Green Belt. This is shown in Table 16 below.

Areas inset within North Cheshire Green Belt	LPS Policy PG 7 Expected level of development	Areas beyond North Cheshire Green Belt	LPS Policy PG 7 Expected level of development
Macclesfield	4,250	Crewe	7,700
Handforth	2,200	Alsager	2,000
Knutsford	950	Congleton	4,150
Poynton	650	Middlewich	1,950
Wilmslow	900	Nantwich	2,050
		Sandbach	2,750
Total	8,950	Total	20,600
Total PT &KSC expected levels of development	29,550	Total PT &KSC expected levels of development	29,550
As % of KSC expected level of development	30.3%	As % of KSC expected level of development	69.7%

Table 16: Proportion of expected development at PTs and KSCs in areas inset by Green Belt

4.56 Table 17 below shows that of the 3,210 new dwellings completed or committed in LSCs, 32.1% are in settlements inset within the North Cheshire Green Belt and 67.9% are in settlements beyond the Green Belt.

Areas inset within North Cheshire Green Belt	Supply (at 31 March 2020)	Areas beyond North Cheshire Green Belt	Supply (at 31 March 2020)
Alderley Edge	165	Audlem	224
Bollington	339	Bunbury	108
Chelford	203	Goostrey	12
Disley	231	Haslington	487
Mobberley	11	Holmes Chapel	871
Prestbury	82	Shavington	365
		Wrenbury	112
Total	1,031	Total	2,179
Total LSC supply	3,210	Total LSC supply	3,210
As % of LSC supply	32.1%	As % of LSC supply	67.9%

Table 17: Proportion of LSC supply in areas inset by Green Belt

- 4.57 Based on the distribution of supply at LSCs shown in Table 17, a slightly higher proportion of new dwellings in LSCs will be provided in settlements inset within the North Cheshire Green Belt compared to the proportion of expected levels of development at those PTs and KSCs inset in the Green Belt.
- 4.58 It is not necessary to make alterations to Green Belt boundaries to facilitate the total indicative level of development in LSCs envisaged by PG 7. The spatial distribution of supply in LSCs provides for a slightly higher proportion of development in inset settlements than the equivalent spatial distribution for PTs and KSCs.
- 4.59 As a result, it must be concluded that the exceptional circumstances required to make Green Belt boundary alterations (the importance of allocating land to

go some way to meeting the identified development needs in the north of the borough, combined with the consequences for sustainable development of not doing so) do not exist to justify making further boundary alterations to allocate sites for development during this plan period.

- 4.60 The consideration of exceptional circumstances to justify the alteration of Green Belt boundaries to accommodate the remaining amount of safeguarded land is set out separately in the LSC Safeguarded Land Distribution Report [ED 53].

Spatial distribution

- 4.61 The current supply of housing at the LSC tier of 3,210 dwellings is considered to lie 'in the order of' 3,500 dwellings. This supply has been achieved through windfall to date.
- 4.62 Having regard to evidence of windfall delivery, it is highly likely that further housing development through small site windfall schemes will reinforce this position. Additional development may also come forward on larger windfall sites, although because of the more unpredictable nature of these sites a specific contributory number cannot be placed against them. There is a reasonable prospect that 'in the order of' 3,500 dwellings will come forward at LSCs by 2030 without making site allocations at LSCs.
- 4.63 Furthermore, the significantly increased level of flexibility in the overall plan housing numbers (set out in Chapter 8 below) gives confidence that the overall 36,000 plan housing requirement will be met in full over the plan period without requiring site allocations in the LSCs.
- 4.64 Because there is now no requirement for site allocations at LSCs to facilitate the indicative level of new housing development, further consideration has been given as to whether it is appropriate to disaggregate the overall LSC spatial distribution of housing figure further.
- 4.65 Because the approach to facilitating the overall indicative level of housing development planned for the LSCs has been determined through completions and commitments to be added to by future windfall commitments (rather than through site allocations), it is not considered appropriate to disaggregate the overall LSC housing figure further to individual LSCs. However, neighbourhood plans will still be able to set figures for individual areas should they wish, subject to the basic condition of general conformity with the strategic policies for the area.
- 4.66 Taking into account of all factors and the information presented in this report the council's position is that this is an appropriate strategy towards new housing development at LSCs, taking into account the reasonable alternatives considered within the SADPD Sustainability Appraisal, and is an approach consistent with the strategic policies of the LPS.

Other Settlements and Rural Areas

- 4.67 LPS Policy PG 7 ‘Spatial distribution of development’ indicates that the OSRA tier is expected to accommodate in the order of 2,950 new dwellings over the plan period which is 8% of the overall housing requirement of 36,000 new dwellings.
- 4.68 Table 18 shows that at the 31 March 2020, housing supply across the Other Settlements and Rural Areas is 3,366 dwellings. Of this supply, 1,705 dwellings have been completed.

Area	LPS Expected level of development	Completions	Commitments	Allocations (without permission)	Total
Other Settlements and Rural Areas	2,950	1,705	1,655	6	3,366

Table 18: Housing supply in Other Settlements and Rural Areas

- 4.69 Given that supply of 3,336 dwellings is +416 above the expected levels of development of 2,950 dwellings, no further allocations are proposed in the SADPD.
- 4.70 Furthermore, the significantly increased level of flexibility in housing supply, this gives confidence that the overall 36,000 plan housing requirement will be met in full over the plan period without requiring additional site allocations in the OSRA.

Spatial distribution

- 4.71 Consideration has also been given to whether it is necessary to disaggregate LPS expected levels of development for the OSRA tier to individual settlements. However, given the large number and variety of smaller settlements in the OSRA, it is not considered that a prescriptive approach to the spatial distribution of development within this tier is necessary or beneficial.
- 4.72 There are a very significant number of settlements in OSRA. Even if the disaggregation exercise was confined to the settlements that have been defined as villages for the purposes of establishing where limited infilling may be acceptable or not, this would still have involved 36 further settlements. The council is also mindful that the overall development requirements for the OSRA tier can be comfortably met (and exceeded) by completions to date and existing commitments.

5. Employment provision and delivery

Introduction

- 5.1 Appendix A of the LPS identified the take up of employment land, supply and allocations to facilitate the overall levels of employment development envisaged by LPS Policy PG 1, namely a minimum of 380 hectares (“ha”) of employment land over the plan period.
- 5.2 The SADPD is being prepared half-way through the plan period. This chapter summarises the latest monitoring position at 31 March 2020 and this informs the approach taken towards the provision of employment land in the SADPD set out in Chapter 6.
- 5.3 Appendix 2 of this report provides further details of the employment land position based upon adoption of the SADPD.

2020 employment monitoring position

- 5.4 Table 19 below shows that at the 31 March 2020, gross employment land provision is 408.55ha. 54% of this gross provision comprises of land that is allocated in the LPS and the Local Plans prepared by the former Districts. 27% has planning permission and 19% is under construction.

	B1a	B1b	B1c	B1	B2	B8	Mixed Use	Total
Gross supply (ha)	0.25	0.00	0.01	30.72	0.14	4.67	372.76	408.55

Table 19: Employment land supply as at 31 March 2020

- 5.5 Gross provision exceeds the LPS employment requirement of 380ha by +28.55ha. Appendix 2 shows that take-up across all areas is 38.51ha.

Flexibility

- 5.6 The LPS employment land requirement of 380ha includes within it 20% flexibility to reflect aspirations for employment led growth⁸. As set out above, gross provision exceeds the requirement and this provides an additional level of further flexibility over and above that already included within the requirement.

⁸ Source: Alignment of Economic, Employment and Housing Strategy - Ekosgen Report (July 2015) (¶¶3.55 to 3.58)

Losses

- 5.7 The LPS employment land requirement of 380ha includes within it an allowance for losses of employment land to other uses⁹. This is 120ha of employment land plus 20% flexibility over the plan period. This allowance equates to 7.2ha per annum. Appendix 2 shows that losses at 31 March 2020 are 9.58ha.
- 5.8 Because employment land requirements are expressed as gross requirements (and already include a significant allowance for the replacement of land lost to alternative uses), there is no need to 'replace' this land lost by making new allocations.

⁹ Source: Alignment of Economic, Employment and Housing Strategy - Ekosgen Report (July 2015) (¶¶3.55 to 3.58)

6. The approach taken towards the provision of employment land and spatial distribution in the SADPD

Introduction

6.1 As set out in ¶5.4, gross employment land provision at 31 March 2020 is 408.55ha. Taking into account of the latest monitoring information, this chapter considers the approach taken towards the provision of employment land and its spatial distribution across the various named settlements and/or tiers of the LPS settlement hierarchy.

Principal Towns

6.2 LPS Policy PG 7 indicates that the PTs are expected to accommodate 'in the order of' 85ha of employment land over the plan period. This is 22.4% of the overall employment land requirement of 380ha. PTs are the most sustainable locations for growth and development in these locations best enables dwellings, jobs and other facilities to be located close to each other.

6.3 Table 20 shows that at the 31 March 2020, employment land provision in the two PTs of Crewe and Macclesfield is 71.53ha and 20.93ha respectively and this is compared to an expected level of development of 65ha and 20ha.

6.4 Total provision for the PTs is 92.46ha, this is +7.46ha over the expected level of development of 85ha. Take-up is 20.12ha.

Area	LPS PG 7 figure (ha)	Supply (ha)	Take-up (ha)	Losses (ha)	Total provision (ha)
Crewe	65.00	50.98	17.35	3.20	71.53
Macclesfield	20.00	16.48	2.77	1.68	20.93
Principal Towns Total	85.00	67.46	20.12	4.88	92.46

Table 20: Employment land provision in the Principal Towns as at 31 March 2020

6.5 Provision exceeding expected levels of development for PTs is reflective of the plan strategy of directing the majority of all new housing and employment development to the borough's PTs and KSCs as the most sustainable locations for growth. Further information is set out in the Crewe Settlement Report [ED 28] and the Macclesfield Settlement Report [ED 35].

6.6 As explained in Chapter 7, the Employment Allocations Review [ED 12] considers each of the existing employment allocations from saved policies in legacy local plans. Where sites are considered appropriate for continued

allocation for employment purposes, their allocation will be continued by a new LPS Policy in the SADPD.

- 6.7 For PTs, the Employment Allocations Review recommends that two current employment allocations in Crewe (E.1.1 Land E of University Way and E1.1 Area B, E of University Way) are no longer suitable for continued employment allocation in the SADPD. Therefore, while these sites currently form part of the total employment land provision, they will not do so upon adoption of the SADPD as they will effectively be de-allocated. No sites are proposed for de-allocation in Macclesfield.
- 6.8 Unlike sites lost to alternative uses, the gross employment land requirements do not include an allowance for the replacement of sites de-allocated for employment purposes. However, even with this reduction in supply (2ha), existing employment provision (71.53ha) will still exceed the expected level of development in Crewe (65ha).
- 6.9 In addition, although the expected level of employment land provision at Crewe has been met, two sites have been proposed for allocation for employment purposes because of their particular circumstances and further details can be found in the Crewe Settlement Report [ED 28].
- 6.10 Both sites will support large, established and key local employers, by facilitating their own further investment, expansion and job creation. Both sites fall within the proposed settlement boundary for the town and are highly sustainable locations for employment growth. Given that the sites fall within the settlement boundary, development for employment purposes would, in principal, be acceptable even if not allocated. Together these sites provide a further 6.91 ha of employment land for the town.

Key Service Centres

- 6.11 LPS Policy PG 7 indicates that the KSCs are expected to accommodate 'in the order of' 219 hectares of employment land over the plan period or 57.6% of the overall employment land requirement of 380ha. 75ha of the expected level of development for KSCs is anticipated to met in Middlewich, primarily through a major employment allocation, LPS 44 'Midpoint 18'. Along with PTs, KSCs are amongst the most sustainable locations for growth and development in these locations best enables dwellings, jobs and other facilities to be located close to each other.
- 6.12 Table 21 below shows that at the 31 March 2020, total employment land provision in the KSCs is 280.94 ha. This is +61.94ha over the expected level of development of 219ha. Take-up across all KSCs is 6.45ha.

Area	LPS PG 7 figure (ha)	Supply (ha)	Take-up (ha)	Losses (ha)	Total provision (ha)
Alsager	40.00	37.61	0.13	0.00	37.74
Congleton	24.00	20.14	0.84	2.20	23.18
Handforth	22.00	19.56	1.07	1.26	21.89
Knutsford	15.00	14.63	0.23	0.00	14.86
Middlewich	75.00	134.29	2.25	0.00	136.54
Nantwich	3.00	3.58	0.25	0.00	3.83
Poynton	10.00	9.91	0.02	0.00	9.93
Sandbach	20.00	20.00	0.04	0.00	20.04
Wilmslow	10.00	11.31	1.62	0.00	12.93
Key Service Centres Total	219.00	271.03	6.45	3.46	280.94

Table 21: Employment land provision in the KSCs as at 31 March 2020

- 6.13 Provision exceeding expected levels of development for KSCs is reflective of the plan strategy of directing the majority of all new housing and employment development to the borough's PTs and KSCs as the most sustainable locations for growth.
- 6.14 Employment land provision meets and exceeds the expected level of provision in Middlewich, Nantwich, Sandbach and Wilmslow.
- 6.15 As explained in Chapter 7 below, the Employment Allocations Review [ED 12] considers each of the existing employment allocations from saved policies in legacy local plans. Where sites are considered appropriate for continued allocation for employment purposes, their allocation will be continued by a new LPS Policy in the SADPD.
- 6.16 For Middlewich, the Employment Allocations Review recommends that one current employment allocation (5.40ha) is no longer suitable for continued employment allocation in the SADPD; whilst another allocation (7.05 ha) that is not currently counted towards the supply (by virtue of being designated as owner-specific expansion land) is suitable for a general employment land allocation and should be counted in the supply in the future. This site already falls within settlement boundary for the town meaning that employment development is acceptable, in principle, on the site subject to the application of development management policies, even if it were not allocated in the SADPD. Therefore, the total supply in Middlewich will increase further following the Employment Allocations Review.
- 6.17 For Alsager, Congleton, Handforth, Knutsford and Poynton, provision falls slightly below the expected levels of development for these towns. Further commentary is provided below about the situation at each of these towns.

Alsager

- 6.18 The focus for Alsager over the plan period is to boost economic growth in the town, increase job density and reduce overall out-commuting. The position of Alsager, adjacent to the M6 makes it an attractive proposition for upcoming investment.
- 6.19 As set out in Table 21, employment provision in Alsager at 31 March 2020 is 37.74 ha. This is 2.26ha below the LPS expected level of development of 'in the order of' 40 ha but it is still 94.4% of it.
- 6.20 Account has also been taken of the existence of strategic site LPS 23 'Radway Green Brownfield'. This is a strategic site allocation in the LPS, which represents a significant (10 ha) area of brownfield land that is currently vacant and available for employment development. As the site was historically in employment use, it is not counted towards the 40 ha 'in the order of' figure as it is not net additional employment land. However, it does benefit from outline planning permission for B1c, B2, B8 and ancillary B1 office use and when it is developed, will contribute to boosting economic growth and increasing job density in Alsager.
- 6.21 It is considered that the existing 37.74 ha provision lies in the order of the expected 40 ha provision. Furthermore, the presence of LPS 23 (which although does not technically contribute to the employment land supply) will assist in boosting economic growth in Alsager.
- 6.22 As a result, it is reasonable to conclude that no further employment allocations are required in the town.

Congleton

- 6.23 The focus for Congleton over the plan period is that of high quality employment led growth to accommodate the expansion of existing businesses and attract new investment into the town. A key part of the LPS strategy for Congleton is the delivery of the Congleton Link Road, now under construction, which will support the opening up of new development sites, in particular, to improve access to existing employment sites at Radnor Park Industrial Estate and Congleton Business Park.
- 6.24 As set out in Table 21 employment provision in Congleton at 31 March 2020 is 23.18ha. This is 0.82ha short of the LPS expected level of development of 'in the order of' 24 ha but it is still 96.6% of it.
- 6.25 While it would be reasonable to conclude that provision of 23.18ha is 'in the order of' 24ha, as set out in the Congleton Settlement Report [ED 27] a 0.95 ha site has been identified within the settlement boundary on an existing business park. The site is effectively an undeveloped parcel of land that forms part of an existing employment area. The site has previously benefitted from planning permission and is considered highly-suitable for employment uses.

As the site falls within the settlement boundary, its development for employment purposes is, in principle, acceptable whether it is allocated or not.

- 6.26 Taking account of this site, allocated for employment uses in the SADPD, this results in a total provision of 24.13 ha of employment land for Congleton; slightly exceeding the 24 ha figure in LPS Policy PG7.

Handforth

- 6.27 The strategy for Handforth over the LPS period is to provide a significant number of new dwellings in a high-demand residential area, with high-quality employment growth reflecting the North Cheshire Science Corridor and the area's locational advantages close to key transport routes, the Greater Manchester conurbation and the Airport City Enterprise Zone whilst delivering improved infrastructure, services and facilities.
- 6.28 In addition to providing land to meet its own development requirements, Handforth is the location for a new settlement to assist in meeting development needs arising across the northern sub-area of the borough.
- 6.29 As set out in Table 21, employment provision in Handforth at 31 March 2020 is 21.89 ha. This is 0.11ha short of the LPS expected level of development of 'in the order of' 22 ha but it is 99.5% of it.
- 6.30 In addition, the overall figure for Handforth includes provision for a new settlement, which will assist in meeting development needs arising in other towns across the northern sub-area of the borough (Macclesfield, Knutsford, Poynton and Wilmslow). These towns, where employment needs arise, now collectively have extra provision over and above their expected level of development.
- 6.31 Provision of 21.89 ha is in the order of the indicative 22ha figure in LPS Policy PG7. As a result, it is reasonable to conclude that no further employment allocations are required in Handforth.

Knutsford

- 6.32 The strategy for Knutsford over the plan period is to accommodate a modest level of housing and employment growth, reflecting its size and status as a KSC. The popularity of Knutsford as a residential location and its ability to attract investment and jobs must be balanced with the need to minimise the harm to the Green Belt given the lack of available land in the urban area.
- 6.33 As set out in Table 21, employment provision in Knutsford at 31 March 2020 is 14.86 ha. This is 0.14ha short of the LPS expected level of provision of 'in the order of' 15 ha but is still 99.1% of it.
- 6.34 Existing provision of 14.86 ha is in the order of the indicative 15 ha figure in LPS Policy PG7. As a result, it is reasonable to conclude that no further employment allocations are required in Knutsford.

Poynton

- 6.35 The focus for Poynton over the plan period is that of high quality housing-led growth to accommodate the growing needs of the town. New employment to accommodate the expansion of existing businesses, attract new investment into the town, and to provide the opportunity to reduce the level of out-commuting is seen as an important part of creating a balanced and sustainable community.
- 6.36 As set out in Table 21, employment provision in Poynton at 31 March 2020 is 9.93 ha. This is 0.07 ha short of the LPS expected level of provision of 'in the order of' 10 ha but it is still 99.3% of it.
- 6.37 Existing provision of 9.93 ha provision is in the order of the indicative 10ha figure in LPS Policy PG7. As a result, it is reasonable to conclude that no further employment allocations are required in Poynton.

Local Service Centres

- 6.38 LPS Policy PG 7 indicates that the LSCs are expected to accommodate 'in the order of' 7 hectares of employment land over the plan period or 1.8% of the overall employment requirement of 380ha. Expected levels of development are not disaggregated further to the individual settlements in the LSC tier.
- 6.39 LSCs are expected to accommodate lower levels of development than PTs and KSCs reflective of their position in the settlement hierarchy.
- 6.40 Table 22 below shows that at the 31 March 2020, total employment land provision in the LSCs is 6.11ha. Take-up is 2.56ha.

Area	Supply (ha)	Take-up (ha)	Losses (ha)	Total provision (ha)
Alderley Edge	0.00	0.14	0.00	0.14
Audlem	0.00	0.00	0.00	0.00
Bollington	1.57	0.01	1.24	2.82
Bunbury	0.00	0.00	0.00	0.00
Chelford	0.15	0.00	0.00	0.15
Disley	0.00	0.35	0.00	0.35
Goostrey	0.00	0.00	0.00	0.00
Haslington	0.00	0.08	0.00	0.08
Holmes Chapel	0.59	0.78	0.00	1.37
Mobberley	0.00	0.20	0.00	0.20
Prestbury	0.00	0.01	0.00	0.01
Shavington	0.00	0.90	0.00	0.90
Wrenbury	0.00	0.09	0.00	0.09
Local Service Centre Total	2.31	2.56	1.24	6.11

Table 22: Employment land provision in the LSCs as at 31 March 2020

- 6.41 Employment provision of 6.11ha is 0.89ha below the LPS indicative expected levels of development for the LSCs or 87.3% of it. However, an element of this provision consists of employment sites allocated by virtue of saved policies in the Borough of Crewe & Nantwich Replacement Local Plan 2005; the Congleton Borough Local Plan First Review 2005; and the Macclesfield Borough Local Plan 2004.
- 6.42 It is intended that these saved policies will be deleted upon adoption of the SADPD and therefore employment sites allocated by virtue of these policies would cease to be allocated at that time.
- 6.43 As explained in Chapter 7, the Employment Allocations Review [ED 12] considers each of the existing employment allocations from these legacy local plans. Where sites are considered appropriate for continued allocation for employment purposes, their allocation will be continued by a new LPS Policy in the SADPD.
- 6.44 For the LSC tier of the hierarchy, the Employment Allocations Review recommends that one current employment allocation in Bollington (1.57ha) is no longer suitable for continued employment allocation in the SADPD. Therefore, whilst this site currently forms part of the total employment land provision, it will not do so upon adoption of the SADPD as it will effectively be de-allocated. Unlike sites lost to alternative uses, the gross employment land requirements do not include an allowance for the replacement of sites de-allocated for employment purposes. Therefore, without this site, provision will reduce from 6.11 ha to 4.54 ha. This will increase the gap between provision and the LPS Policy PG 7 indicative figure of 7 ha to 2.46 ha.

- 6.45 This gap in provision amounts to 35.1% of the expected level of development for LSCs. Taking this into account consideration has been given to the need to allocate further employment land at LSCs.
- 6.46 All employment sites submitted for consideration for inclusion in the SADPD have been assessed using the Site Selection Methodology ["SSM"] and further details can be found in the various LSC Settlement Reports.
- 6.47 In summary, a limited number of employment sites have been put forward for consideration through the SSM. Other than existing commitments and completions, the majority of LSCs have no sites that can be considered for employment use. Only one site has been put forward for purely employment use - Recipharm in Holmes Chapel.
- 6.48 The Recipharm site has been assessed in the Holmes Chapel Settlement Report [ED 33], it provides 5.99 ha of employment land and is considered to be highly suitable for employment use. There is a lack of available employment sites in the majority of LSCs, and of those that have been put forward all except the Recipharm site propose an element of employment as part of a wider residential-led scheme. Given that no further sites for housing are proposed for allocation in LSCs, the Recipharm site is the only pure employment site available for consideration.
- 6.49 In addition, it is relevant that Holmes Chapel is likely to see by far the highest level of housing development of all the LSCs during the plan period. At 31 March 2020, housing supply in Holmes Chapel is 871 dwellings. By comparison, the LSC with the next highest level of housing completions and commitments is Haslington, with a housing supply of 487 dwellings.
- 6.50 Furthermore, the site will act as an extension to an existing key employment area listed in paragraph 11.25 of the LPS (referenced by its previous name 'Sanofi Aventis'), making a key contribution to the borough's employment land supply as detailed in paragraphs 4.19 to 4.21 of the Holmes Chapel Settlement Report [ED 33].
- 6.51 As set out in Appendix 2, with the inclusion of the Recipharm site (HCH 1 'Land east of London Road), provision of 10.53ha across the LSCs will exceed the indicative 7ha employment land figure for LSCs identified in LPS Policy PG 7 by +3.53ha.

Green Belt considerations

- 6.52 The LPS made a number of alterations to Green Belt boundaries to allocate sites for development and to identify safeguarded land.
- 6.53 Paragraph 8.48 of the LPS confirms that "*the importance of allocating land to go some way to meeting the identified development needs in the north of the borough, combined with the consequences for sustainable development of not doing so, constitutes the exceptional circumstances required to justify alteration of the existing detailed Green Belt boundaries, whilst maintaining the overall general extent of the Green Belt*".

- 6.54 It is intended that, together, the LPS and SADPD will ensure that the levels of development expected by the LPS can be met in full during the plan period. LPS Policy PG 3 'Green Belt' lists all the areas of land removed from the Green Belt upon adoption of the LPS in 2017 and in advance of the preparation of the SADPD, criterion 6 of LPS Policy PG 3 highlights that "*in addition to these areas listed for removal from the Green Belt, it may also be necessary to identify additional non-strategic sites to be removed in the SADPD*".
- 6.55 In association with its LPS Policy PG 2 'Settlement Hierarchy', the LPS includes a vision for local service centres. This states: "*In the Local Service Centres, some modest growth in housing and employment will have taken place to meet locally arising needs and priorities, to reduce the level of out-commuting and to secure their continuing vitality. This may require small scale alterations to the Green Belt in some circumstances.*" The explanation text (para 8.30) clarifies that these small scale alterations "*will be pursued as necessary through the Site Allocations and Development Policies Document.*"
- 6.56 The Inspector's Final Report into the LPS Examination¹⁰ also provides some context for consideration of Green Belt through the SADPD. The exceptional circumstances as stated in the Inspector's final report (¶94) are "*based on the need to allocate sufficient land for market and affordable housing and employment development, combined with the adverse consequences for patterns of sustainable development of not doing so, since it is not practicable to fully meet the assessed development needs of the area without amending Green Belt boundaries.*"
- 6.57 With respect to further releases, the Inspector clarifies that "*I also understand that the SADPDPD will consider the possibility of identifying further smaller scale releases of land from the Green Belt, if exceptional circumstances can be demonstrated, in line with the site-selection methodology*" (¶97) and "*CEC also confirms that the SADPDPD will consider the need to provide a modest amount of Safeguarded Land at the LSCs, if necessary, in line with the spatial distribution of Safeguarded Land envisaged in the supporting evidence*" (¶102).
- 6.58 As set out in the NPPF (¶136), Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plan. The need for any changes to Green Belt boundaries should be established through strategic policies.
- 6.59 The exceptional circumstances are fully set out and justified in the LPS evidence base, and summarised in ¶¶8.42 to 8.49 of the LPS. NPPF ¶136 also states that where strategic policies have established a need for changes to Green Belt boundaries, detailed amendments to those boundaries can be through non-strategic policies.

¹⁰ <https://www.cheshireeast.gov.uk/pdf/planning/spatial-planning/celps-inspectors-final-report.pdf>

- 6.60 Whilst the LPS strategic policy allows for the SADPD non-strategic policies to make further detailed amendments to the Green Belt boundary, it does not require it to do so.
- 6.61 As set out in Chapter 5, the SADPD is being prepared in the context of overall employment provision exceeding the requirement set out in the LPS.
- 6.62 Employment land provision at LSCs when taking into account the allocation at Recipharm, Holmes Chapel (5.99ha) will exceed the LPS expected level for LSCs of ‘in the order’ of 7ha by 3.53ha.
- 6.63 There is a duty on the council to consider whether the exceptional circumstances identified in the preparation of the LPS still exist to justify further detailed boundary amendments at LSCs in the SADPD.
- 6.64 In addition to facilitating overall employment land delivery, the exceptional circumstances previously identified through the LPS also included enabling sustainable patterns of development by identifying land to go “some way” to meeting the identified development needs in the north of the borough, whilst recognising that a proportion of development needs arising in Green Belt areas were channelled to locations beyond the Green Belt.
- 6.65 An analysis of the ‘in the order’ figures for PTs and KSCs in LPS Policy PG 7 shows that 25.3% of employment provision is in inset settlements whilst 74.7% would be in settlements beyond the North Cheshire Green Belt. This is shown in Table 23 below.

Areas inset within North Cheshire Green Belt	LPS Policy PG 7 Expected level of development (ha)	Areas beyond North Cheshire Green Belt	LPS Policy PG 7 Expected level of development (ha)
Macclesfield	20	Crewe	65
Handforth	22	Alsager	40
Knutsford	15	Congleton	24
Poynton	10	Middlewich	75
Wilmslow	10	Nantwich	3
		Sandbach	20
Total	77	Total	227
Total PT &KSC expected levels of development	304	Total PT &KSC expected levels of development	304
As % of KSC expected level of development	25.3%	As % of KSC expected level of development	74.7%

Table 23: Proportion of expected development at PTs and KSCs in areas inset by Green Belt

6.66 In comparison, table 24 below shows that of the 6.11ha of existing provision in LSCs, 3.67ha is in settlements inset within the North Cheshire Green Belt (or 52.4% of the LPS expected level of development for LSCs) and 2.44% is in settlements beyond the Green Belt (or 34.9% of the LPS expected level of development for LSCs).

Areas inset within North Cheshire Green Belt	Provision (ha) (31 March 2020)	Areas beyond North Cheshire Green Belt	Provision (ha) (31 March 2020)
Alderley Edge	0.14	Audlem	0
Bollington	2.82	Bunbury	0
Chelford	0.15	Goostrey	0
Disley	0.35	Haslington	0.08
Mobberley	0.20	Holmes Chapel	1.37
Prestbury	0.01	Shavington	0.90
		Wrenbury	0.09
Total	3.67	Total	2.44
Total (3.67) as % of LPS expected level of development (7ha) for LSCs	52.4%	Total (2.44) as % of LPS expected level of development (7ha) for LSCs	34.9%

Table 24: Proportion of existing LSC employment provision in areas inset by Green Belt and beyond.

6.67 Based on the distribution of existing supply at LSCs shown in Table 24, a higher proportion of employment land provision is at settlements inset within the Green Belt compared to the expected levels of development at those PTs and KSCs inset within the Green Belt.

6.68 This position changes when taking account of employment provision upon adoption of the SADPD, including the allocation of the 5.99ha Recipharm site at Holmes Chapel plus any sites deallocated.

6.69 Table 25 below shows that while employment provision at settlements beyond the Green Belt will increase upon adoption of the SADPD because of the allocation at Holmes Chapel, employment provision at settlements inset within the Green Belt will be 2.1ha. This amounts to 30% of the overall expected level of employment provision (7ha) for LSCs. This is a slightly higher proportion of the employment land provision to be provided in inset settlements than is the equivalent for PTs and KSCs (25.3%).

Areas inset within North Cheshire Green Belt	Employment provision (upon adoption of the SADPD)	Areas beyond North Cheshire Green Belt	Employment provision (upon adoption of the SADPD)
Alderley Edge	0.14	Audlem	0
Bollington	1.25	Bunbury	0
Chelford	0.15	Goostrey	0
Disley	0.35	Haslington	0.08
Mobberley	0.20	Holmes Chapel	7.36
Prestbury	0.01	Shavington	0.90
		Wrenbury	0.09
Total	2.1	Total	8.43
As a % of LPS expected level of development for LSCs (7ha)	30%	As a % of LPS expected level of development for LSCs (7ha)	120.4%

Table 25: Proportion of existing LSC employment provision upon adoption of the SADPD in areas inset by Green Belt and beyond.

- 6.70 It is not necessary to make alterations to Green Belt boundaries to facilitate the total indicative level of development in LSCs envisaged by PG 7, and the spatial distribution of the development in LSCs provides for a slightly higher proportion of development in inset settlements than the equivalent spatial distribution for PTs and KSCs. As a result, it is concluded that the exceptional circumstances required to make Green Belt boundary alterations (the importance of allocating land to go some way to meeting the identified development needs in the north of the borough, combined with the consequences for sustainable development of not doing so) does not exist to justify making further boundary alterations to allocate sites for development during this plan period.
- 6.71 The consideration of exceptional circumstances to justify the alteration of Green Belt boundaries to accommodate the remaining amount of safeguarded land is set out separately in the LSC Safeguarded Land Distribution Report [ED 53].

Spatial distribution

- 6.72 As set out above, provision of employment land at the LSC tier including the allocation to be made at Holmes Chapel is 10.53ha. This exceeds the LPS expected level of development of 7 ha.
- 6.73 Consideration has been given as to whether it is appropriate to disaggregate the overall LSC spatial distribution figure set out in PG 7 for employment land further.
- 6.74 Because the approach to facilitating the overall indicative level of employment for the LSCs has been determined through take-up, commitments and the

proposed allocation at Holmes Chapel, it is not considered necessary to disaggregate the overall LSC employment figure further to individual LSCs. However, neighbourhood plans will still be able to set figures for individual areas should they wish, subject to the basic condition of general conformity with the strategic policies for the area.

- 6.75 Taking into account of all factors and the information presented in this report the council’s position is that this is an appropriate strategy towards new employment development at LSCs, taking into account the reasonable alternatives considered within the SADPD Sustainability Appraisal, and is an approach consistent with the strategic policies of the LPS.

Other Settlements and Rural Areas

- 6.76 LPS Policy PG 7 indicates that the OSRA is expected to accommodate ‘in the order of’ 69ha of employment land over the plan period, most of which is to be provided at a single employment site – LPS 60: Wardle Employment Improvement Area. This is 18% of the overall employment requirement of 380 ha. Expected levels of development (beyond the land allocated) are not disaggregated further to the individual settlements in the OSRA tier.
- 6.77 Table 26 below shows that at the 31 March 2020, total employment land provision in the OSRA is 77.13ha. Take-up is 9.38ha.

Area	Supply (ha)	Take-up (ha)	Losses(ha)	Total provision (ha)
Other Settlements and Rural Areas	67.75	9.38	0.00	77.13

Table 26: Employment land provision in the OSRA as at 31 March 2020

- 6.78 Existing provision of 77.13ha exceeds the LPS expected level of provision of 69ha. It is not necessary to make employment allocations in the SADPD to facilitate the indicative level of development identified for in this tier of the settlement hierarchy.

Spatial distribution

- 6.79 Consideration has also been given to whether it is necessary to disaggregate LPS expected levels of development for the OSRA tier to individual settlements. However, given the large number and variety of smaller settlements in the OSRA, it is not considered that a prescriptive approach to the spatial distribution of development within this tier is necessary or beneficial.

6.80 There are a very significant number of settlements in OSRA. Even if the disaggregation exercise was confined to the settlements that have been defined as villages for the purposes of establishing where limited infilling may be acceptable or not, this would still have involved 36 further settlements. The council is also mindful that the overall development requirements for the OSRA tier can be comfortably met (and exceeded) by completions to date and existing commitments.

7. Review of employment allocations

- 7.1 As set out in paragraph 5.4, existing employment land supply forms an important component of the overall employment land provision. This is in addition to sites allocated through the local plan. This supply consists of committed sites, sites under construction and allocated sites from the legacy local plans. It does not include take-up of employment land or supply losses.
- 7.2 A number of employment sites currently in the employment land supply are allocated for employment uses by virtue of saved policies in the Borough of Crewe & Nantwich Local Plan 2005; the Congleton Borough Local Plan 2005; and the Macclesfield Borough Local Plan 2004. It is intended that these saved policies will be deleted upon adoption of the SADPD and therefore employment sites allocated by virtue of these policies would cease to be allocated at that time, unless benefitting from an extant planning consent.
- 7.3 It is considered that a number of these sites remain highly-suitable for employment use and the Employment Allocations Review [ED 12] considers each of the remaining employment allocations from the legacy local plans to determine whether each site is suitable for continued allocation for employment purposes through the SADPD.
- 7.4 The review has been carried out in two stages: firstly to assess whether there is a 'reasonable prospect' of the site being used for employment purposes over the plan period; and secondly to determine the suitability of each site for allocation in the SADPD using stage four of the site selection methodology (as set out in the Site Selection Methodology Report [ED 07]).
- 7.5 Existing and allocated employment sites are considered to be 'lost' to employment uses when development for an alternative use commences on site. The gross employment land requirement (380 ha) set out in LPS Policy PG 1 already includes a substantial allowance to replace sites 'lost' to employment uses. Therefore, when considering the need to make further employment site allocations, there is no need to replace employment land already lost to alternative uses within the plan period, as these losses are already factored in to the gross employment land requirement.
- 7.6 However, the allowance for losses in the gross employment land figure does not include an allowance for employment sites de-allocated through the plan process, where these have not already been lost to alternative uses. Table 27 below sets out the implications of the Employment Allocations Review for the employment land supply upon adoption of the SADPD, at which point each site would either continue to be allocated through the SADPD or cease to be allocated if not.

Site	Size (ha)	Settlement	Hierarchy tier	ED 12 Recommendation	Implications for Employment Land Supply
Weston Interchange	0.60	Crewe	Principal Town	Retain as an employment allocation	The site would be allocated in the SADPD and continue to form part of the supply
Meadow Bridge	0.43	Crewe	Principal Town	Retain as an employment allocation	The site would be allocated in the SADPD and continue to form part of the supply
Remaining land east of University Way	1.55	Crewe	Principal Town	Do not retain as an employment allocation	The site would not be allocated and 1.55 ha would be deducted from the supply
Area B, east of University Way	2.31	Crewe	Principal Town	Do not retain as an employment allocation	The site would not be allocated but as development for an alternative use had started at 31/03/20, there is no need to replace the 2.31 ha lost through new allocations
Hurdsfield Road	1.33	Macclesfield	Principal Town	Retain as an employment allocation	The site would be allocated in the SADPD and continue to form part of the supply
61 MU (former Airparks site)	4.92	Handforth	Key Service Centre	Retain as an employment allocation	The site would be allocated in the SADPD and continue to form part of the supply
Land rear of Handforth Dean Retail Park	2.64	Handforth	Key Service Centre	Retain as an employment allocation	The site would be allocated in the SADPD and continue to form part of the supply
New Farm	7.83	Middlewich	Key Service Centre	Retain as an employment allocation	The site would be allocated in the SADPD and continue to form part of the supply
Brooks Lane, Road Beta	5.40	Middlewich	Key Service Centre	Do not retain as an employment allocation	The site would not be allocated and 5.40 ha would be deducted from the supply
Land adjacent to Lowerhouse Mill, east of Albert Road	1.57	Bollington	Local Service Centre	Do not retain as an employment allocation	The site would not be allocated and 1.57 ha would be deducted from the supply
Land west of Manor Lane	2.30	Holmes Chapel	Local Service Centre	Retain as an employment allocation	The site would be allocated in the SADPD and continue to form part of the supply

Land at Faulkner Drive	7.05	Middlewich	Key Service Centre	Retain as an employment allocation	The site would be allocated in the SADPD. It is not currently counted as part of the supply (as owner-specific expansion land) but would form part of the supply on adoption of the SADPD as a general employment allocation.
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Table 27: Employment Allocations Review [ED 12] findings

7.7 Further details, including the methodology for the assessment and a full review of each of these sites is available in the Employment Allocations Review [ED 12].

8. Sustainability appraisal

Introduction

8.1 The following section sets out a summary of how the reasonable alternatives were developed for the distribution of housing and employment land at the LSCs, the method and summary appraisal findings for the revised disaggregation options. Further detail is set out in the Revised Publication Draft SADPD Sustainability Appraisal [ED 03].

Developing the reasonable alternatives

8.2 At the First Draft SADPD and initial Publication Draft SADPD stages, seven high-level options were prepared and considered as reasonable alternatives through the relevant sustainability appraisal (“SA”). Of the initial seven options, Option 7 ‘Hybrid approach’, was seen as the preferred option and was progressed in the First Draft SADPD and then the initial Publication Draft SADPD. Options 1 to 6 were not progressed, with the reasons for this set out in Table 3.4 of the Revised Publication Draft SADPD SA [ED 03], and, as a result, are not considered as reasonable alternatives for the Revised Publication Draft SADPD.

8.3 The new approach to disaggregation for the Revised Publication Draft SADPD highlighted in this report, herein known as Option 8 ‘Application led’ due to its reliance on windfall commitments for housing (determined through the planning application process) to help facilitate the overall indicative level of housing development planned for the LSCs, is therefore appraised alongside Option 7 ‘Hybrid approach’ in the Revised Publication Draft SADPD SA [ED 03].

8.4 Table 28 explains in further detail the two high-level options that are subject to testing.

Option	Description	Reasoning
7: Hybrid approach	This alternative represents a balanced approach that considers a range of factors - constraints, services and facilities, and opportunities. This option is a blend of Options 3, 4, 5 and 6, with account taken of NDP’s, completions, commitments and take-up.	The distribution of further housing and employment land would be based on a consideration of development opportunities, constraints, services and facilities and NDPs. It involves professional judgement and makes sure that all of the relevant factors are properly considered across all the LSCs in determining a justified spatial distribution. This Option combines Options 3, 4, 5 and 6 and takes into account the Borough’s vision and objectives stated in the LPS, new evidence on development

Option	Description	Reasoning
		opportunities taken from a call for sites carried out between 27 February and 10 April 2017 and the First Draft SADPD consultation, any housing or employment figures for new development in NDPs, and housing and employment completions, take-up and commitments as at 31/3/20.
8: Application led	This alternative takes into account completions, commitments and take-up for housing and employment.	<p>The distribution of further housing and employment land would be based on policies in the development plan, which would take into consideration landscape designations, Green Belt and the historic environment for example, with the aim of achieving sustainable development.</p> <p>This Option takes into account housing and employment completions, take-up and commitments as at 31/3/20. The Option also assumes that future windfall commitments will contribute further to the indicative level of housing development for the LSCs; these windfalls will be determined through the planning application process.</p>

Table 28: Revised disaggregation options subject to testing

Method

8.5 A detailed method for the appraisal of the revised disaggregation options is presented in Appendix C of the Revised Publication Draft SADPD SA [ED 03]. In summary the appraisal seeks to categorise the performance of each option against the sustainability topics in terms of 'significant effects' (using red or green shading) and also rank the alternatives in order of relative performance. Where it is not possible to differentiate between all alternative, '=' is used.

Summary appraisal findings

8.6 A summary of the appraisal findings for the options is provided in Table 29 below, with detailed appraisal findings presented in Appendix C of the Revised Publication Draft SADPD SA [ED 03].

	Option 7	Option 8
Biodiversity, flora and fauna	1	2
Population and human health	1	2
Water and soil	1	2
Air	=	=
Climatic factors	=	=
Transport	=	=
Cultural heritage and landscape	1	2
Social inclusiveness	1	2
Economic development	1	2

Table 29: Summary of appraisal findings: revised disaggregation options

- 8.7 The appraisal found no significant differences between the Options in relation to air, climatic factors and transport. It also found that all of the Options have the potential to result in the permanent loss of greenfield land and BMV agricultural land.
- 8.8 Option 7 is a hybrid approach that considers a range of factors (constraints, services and facilities, and opportunities). It does result in a negative effect for water and soil, biodiversity, flora and fauna, cultural heritage and landscape, air quality and transport, however mitigation is available through LPS and proposed SADPD policies. This Option was found to perform well as it makes best use of those LSCs with existing services and facilities, but takes into account any constraints that the settlements face.
- 8.9 Option 8 looks to use future windfall commitments to contribute further towards the indicative level of housing development, determined through the planning application process. It does result in a negative effect for water and soil, biodiversity, flora and fauna, cultural heritage and landscape, air quality and transport, however mitigation is available through LPS and proposed SADPD policies. The Policy framework leads applicants to look at constraints on the site for example, as part of the planning balance.
- 8.10 In conclusion, the appraisal found that there are differences between the Options, with a variance as to how the growth is distributed; however, neither of the Options are likely to have a significant negative effect given the scale of growth. Although Option 7 was the best performing under six sustainability topics, Option 8 also performed well. While there are likely to be differences between the Options in terms of the significance of effects for individual settlements, there is unlikely to be overall significant effects when considered at a strategic plan level. If an Option proposes more growth in a particular LSC compared to the other Option then it is likely to have an enhanced positive effect for that settlement against topics relating to population and human health, social inclusiveness (if a critical mass is reached) and economic development. Conversely, it is also more likely to have negative effects on the natural environment in that area, which includes designated sites. Mitigation provided through Local Plan Policies and available at the project level should make sure that there are no major negative effects. Ultimately the nature and significance of effects against the majority of topics

will be dependent on the precise location of development. It is also worth reiterating that the overall level of growth to be delivered at the LSCs is set out in the LPS; the SA for the LPS evaluated the potential effects of that growth, although there were uncertainties as the precise location of development was not known.

Reasons for selecting the preferred approach

8.11 Appendix C of the Revised Publication Draft SA [ED 03] sets out a detailed appraisal of each revised option by SA topic. It should be noted that whilst the SA findings are considered by the Council in its selection of options and forms part of the evidence base supporting the Local Plan, the SA findings are not the sole basis for decision making; other factors, set out in this document [ED 05] have informed the Council's approach to decision making.

Revised option	Reasons for progression or non-progression of the option in plan-making
Option 7: Hybrid approach	This approach has not been progressed as there is no requirement for site allocations (and therefore no exceptional circumstances for Green Belt boundary alterations) and the approach to facilitating the overall indicative level of housing development planned for the LSCs has been determined through completions and commitments. Therefore it is not considered appropriate to disaggregate the overall LSC spatial distribution of housing figure further to individual LSCs.
Option 8: Application led	Option 8 (application led) has been progressed as the current supply of housing at the LSC tier (3,210 dwellings) lies in the order of 3,500 dwellings and it is likely that further housing development through windfall schemes will reinforce this position. There is a reasonable prospect that 'in the order of' 3,500 dwellings will come forward at LSCs by 2030 without making site allocations in LSCs.

Table 30: Reasons for the progression or non-progression of revised options in plan-making

Appendix 1: Housing land position (at 31 March 2020)

A1.1 The tables below reflect the housing land position were the SADPD adopted at 31 March 2020.

Principal Towns

Area	Expected level of development	Type (site allocation or other)		Completions to 31 March 2020	Commitments at 31 March 2020	Remainder of allocation (without permission)	Total
Crewe	7700	Site allocations	LPS 1 Central Crewe (400)			189	189
			LPS 2 Basford East (850)		815	35	850
			LPS 3 Basford West (370)	218	152		370
			LPS 4 Leighton West (850)			850	850
			LPS 5 Leighton (500)		400	100	500
			LPS 6 Crewe Green (150)			150	150
			LPS 7 Sydney Road (including extended site) (525)	-1	524		523
			LPS 8 South Cheshire Growth Village (650)			650	650
			LPS 9 The Shavington / Wybunbury Triangle (400)	193	171	36	400
			LPS 10 East Shavington (275)	70	205		275
			LPS 11 Broughton Road (175)		129	46	175
		Other Sites		2188	1875		4063
		Crewe subtotal		2668	4271	2056	8995
Macclesfield	4250	Site allocations	LPS12 Central Macclesfield (500)			231	231
			LPS 13 South Macclesfield Development Area (1050)	22	1078		1100
			LPS 14 Land East of Fence Avenue (250)		300		300
			LPS 15 Land at Congleton Road (300)			300	300
			LPS 16 Land South of Chelford Road (200)		232		232
			LPS 17 Gaw End Lane (300)		310		310
			LPS 18 Land between Chelford Road and Whirley Road (150)		166	0	166
					Other Sites		1511
		Macclesfield subtotal		1533	2868	531	4932
All Principal Towns	11950	Principal Towns subtotal		4201	7139	2587	13927

Table A1.1: Housing land position at Principal Towns

Key Service Centres

Area	Expected level of development	Type (site allocation or other)		Completions to 31 March 2020	Commitments at 31 March 2020	Remainder of allocation (without permission)	Total
Alsager	2000	Site allocations	LPS 20 White Moss Quarry (350)		350		350
			LPS 21 Twyfords and Cardway (550)	43	399	178	620
			LPS 22 Former MMU Campus (400)	145	298		443
		Other Sites		657	206		863
		Alsager subtotal		845	1253	178	2276
Congleton	4150	Site allocations	LPS 26 Back Lane / Radnor Park (750)	136	762		898
			LPS 27 Congleton Business Park Extension (625)			625	625
			LPS 28 Giantswood Lane South (150)	120	11		131
			LPS 29 Giantswood Lane to Manchester Road (500)		500		500
			LPS 30 Manchester Road to Macclesfield Road (450)	172	352		524
			LPS 31 Tall Ash Farm (225)		236		236
			LPS 32 Lamberts Lane (225)	54	166	5	225
		Other Sites		1351	496		1847
		Congleton subtotal		1833	2523	630	4986
Handforth	2200	Site allocations	LPS 33 North Cheshire Growth Village (1500)			1500	1500
			LPS 34 Land between Clay Lane and Sagars Road (250)	-1	224		223
		Other Sites		142	270		412
		Handforth subtotal		141	494	1500	2135
Knutsford	950	Site allocations	LPS 36 Land North of Northwich Road (175)		190		190
			LPS 36 Land West of Manchester Road (75)		60		60
			LPS 36 Land East of Manchester Road (250)		275		275
			LPS 37 Parkgate Extension (200)		200		200
			LPS 38 Land South of Longridge (225)			225	225
		Other Sites		88	79		167
		Knutsford subtotal		88	804	225	1117
Middlewich	1950	Site allocations	LPS 42 Glebe Farm (525)		534	0	534
			LPS 43 Brooks Lane Strategic Location (200)			200	200
			LPS 45 Land off Warmingham Lane (Phase 2) (235)		235		235
			MID 2 East and west of Croxton Lane (50)			50	50
			MID 3 Centurion Way (75)			75	75
		Other Sites		672	156		828
		Middlewich subtotal		672	925	325	1922

Area	Expected level of development	Type (site allocation or other)		Completions to 31 March 2020	Commitments at 31 March 2020	Remainder of allocation (without permission)	Total
Nantwich	2050	Site allocations	LPS 46 Kingsley Fields (1100)	200	803	97	1100
		Other Sites		1107	147		1254
		Nantwich subtotal		1307	950	97	2354
Poynton	650	Site allocations	LPS 48 Land adjacent to Hazelbadge Road (150)		133	0	133
			LPS 49 Land at Sprink Farm (150)		150		150
			LPS 50 Land South of Chester Road (150)	-1	126		125
			PYT 1 Poynton Sports Club (80)			80	80
			PYT 3 Poynton High School (20)			20	20
			PYT 4 Former Vernon Infants School (50)			50	50
		Other Sites		124	30		154
		Poynton subtotal		123	439	150	712
Sandbach	2750	Site allocations	LPS 53 Land Adjacent to J17 of M6, south east of Congleton Road (450)	149	272	25	446
		Other Sites		2031	817		2848
		Sandbach subtotal		2180	1089	25	3294
Wilmslow	900	Site allocations	LPS 54 Royal London (175)		180		180
			LPS 56 Little Stanneylands (200)	35	139		174
			LPS 57 Heathfield Farm (150)	38	123		161
		Other Sites		508	73		581
		Wilmslow subtotal		581	515	0	1096
All Key Service Centres	17600	Key Service Centre subtotal		7770	8992	3130	19892

Table A1.2: Housing land position at Key Service Centres

Local Service Centres

Area	Expected level of development	Type (site allocation or other)	Completions to 31 March 2020	Commitments at 31 March 2020	Remainder of allocation (without permission)	Total
Alderley Edge	3500	Other Sites	90	75		165
		Alderley Edge subtotal	90	75		165
Audlem		Other Sites	172	52		224
		Audlem subtotal	172	52		224
Bollington		Other Sites	198	141		339
		Bollington subtotal	198	141		339
Bunbury		Other Sites	52	56		108
		Bunbury subtotal	52	56		108
Chelford		Other Sites	124	79		203
		Chelford subtotal	124	79		203
Disley		Other Sites	197	34		231
		Disley subtotal	197	34		231
Goostrey		Other Sites	11	1		12
		Goostrey subtotal	11	1		12
Haslington		Other Sites	247	240		487
		Haslington subtotal	247	240		487
Holmes Chapel		Other Sites	553	318		871
		Holmes Chapel subtotal	553	318		871
Mobberley		Other Sites	9	2		11
		Mobberley subtotal	9	2		11
Prestbury	Other Sites	51	31		82	
	Prestbury subtotal	51	31		82	
Shavington	Other Sites	222	143		365	
	Shavington subtotal	222	143		365	
Wrenbury	Site allocations	NP Wrenbury HOU01 New Road Wrenbury		0	10	10
	Other Sites		81	21		102
	Wrenbury subtotal		81	21	10	112
All Local Service Centres	3500	Local Service Centre subtotal	2007	1193	10	3210

Table A1.3: Housing land position at Local Service Centres

Other Settlements and Rural Areas

Area	Expected level of development	Type (site allocation or other)		Completions to 31 March 2020	Commitments at 31 March 2020	Remainder of allocation (without permission)	Total
Other Settlements and Rural Areas	2950	Site allocations	LPS 61 Alderley Park Opportunity Site (275)	119	262		381
		Site allocations	NP Calveley A Station Road, Calveley	8	0		8
		Site allocations	NP Calveley B Land adjacent to The Mount, Calveley		0	6	6
		Site allocations	NP Calveley C Station House, Nantwich Road, Calveley		4		4
		Other Sites		1578	1389		2967
		Other Settlements and Rural Areas subtotal		1705	1655	6	3366

Table A1.4: Housing land position at Other Settlements and Rural Areas

All areas

Area	Expected level of development	Type (site allocation or other)		Completions to 31 March 2020	Commitments at 31 March 2020	Remainder of allocation (without permission)	Total	
Total (all areas)	36000			15683	18979	5733	40395	
		Small sites windfall allowance (remaining years of the plan period)						875
		TOTAL						41270

Table A1.5: Housing land position – All areas

Appendix 2: Employment land position (at 31 March 2020)

A2.1 The Tables below reflect the employment land position were the SADPD adopted at 31 March 2020.

Principal Towns

Area (expected level of development (ha))	Type and area (ha)		Take-up to 31/3/20	Commitments at 31/3/20	Losses to 31/3/20	Remainder of allocations (without permission)	Total
Crewe (65.00)	Site allocations	LPS 2 'Basford East' (24.00)		1.02		22.98	24.00
		LPS 3 'Basford West' (22.16)	4.40	18.23		0.00	22.63
		LPS 4 'Leighton West' (5.00)				5.00	5.00
		Site CRE 1 'Land at Bentley Motors' (1.22)				1.22	1.22
		Site CRE 2 'Land off Gresty Road' (5.69)				5.69	5.69
		EMP 2.1 'Weston Interchange' (0.60)				0.60	0.60
		EMP 2.2 'Meadow Bridge' (0.43)				0.43	0.43
	Other sites		12.95	0.72	3.20		16.87
	Crewe subtotal		17.35	19.97	3.20	35.92	76.44
Macclesfield (20.00)	Site allocations	LPS 13 'South Macclesfield Development Area' (5.00)		2.92		2.08	5.00
		LPS 15 'Land at Congleton Road' (10.00)				10.00	10.00
		EMP 2.4 'Hurdsfield Road' (1.33)				1.33	1.33
	Other sites		2.77	0.15	1.68		4.60
	Macclesfield subtotal		2.77	3.07	1.68	13.41	20.93
All Principal Towns	Principal Towns Total		20.12	23.04	4.88	49.33	97.37

Table A2.1: Employment land position – Principal Towns

Key Service Centres

Area (expected level of development (ha))	Type and area (ha)		Take-up to 31/3/20	Commitments at 31/3/20	Losses to 31/3/20	Remainder of allocations (without permission)	Total
Alsager (40.00)	Site allocations	LPS 23 'Radway Green Brownfield' (0.00) ¹¹				0.00	0.00
		LPS 24 'Radway Green Extension' (25.91)				25.91	25.91
		LPS 25 'Radway Green North' (11.70)		11.70		0.00	11.70
	Other sites		0.13				0.13
	Alsager subtotal		0.13	11.70	0.00	25.91	37.74
Congleton (24.00)	Site allocations	LPS 26 'Back Lane/Radnor Park' (7.10)		6.30		0.80	7.10
		LPS 27 'Congleton Business Park Extension' (13.00)				13.00	13.00
		Site CNG 1 'Land of Alexandria Way' (0.95)				0.95	0.95
	Other sites		0.84	0.04	2.20		3.08
	Congleton subtotal		0.84	6.34	2.20	14.75	24.13
Handforth (22.00)	Site allocations	LPS 33 'North Cheshire Growth Village' (12.00)				12.00	12.00
		EMP 2.5 '61MU' (4.92)				4.92	4.92
		EMP 2.6 'Land rear of Handforth Dean Retail Park' (2.64)				2.64	2.64
	Other sites		1.07		1.26		2.33
	Handforth subtotal		1.07	0.00	1.26	19.56	21.89
Knutsford (15.00)	Site allocations	LPS 36 'North West Knutsford' (7.50)				7.50	7.50
		LPS 37 'Parkgate extension' (7.13)		5.38		1.75	7.13
	Other sites		0.23				0.23
	Knutsford subtotal		0.23	5.38	0.00	9.25	14.86

¹¹ LPS 23 is not counted as contributing to the employment requirement as it is a redevelopment site and is not new employment land.

Area (expected level of development (ha))	Type and area (ha)		Take-up to 31/3/20	Commitments at 31/3/20	Losses to 31/3/20	Remainder of allocations (without permission)	Total
Middlewich (75.00)	Site allocations	LPS 44 'Midpoint 18' (70.00) ¹²	0.86	69.33		50.81	121.00
		EMP 2.7 'New Farm' (7.83)				7.83	7.83
		EMP 2.9 'Land at British Salt' (7.05)				7.05	7.05
	Other sites		1.39	0.92			2.31
	Middlewich subtotal		2.25	70.25	0.00	65.69	138.19
Nantwich (3.00)	Site allocations	LPS 46 'Kingsley Fields' (1.82)				1.82	1.82
		Other sites		0.25	1.76		2.01
	Nantwich subtotal		0.25	1.76	0.00	1.82	3.83
Poynton (10.00)	Site allocations	LPS 51 'Adlington Business Park extension' (9.91)		3.68		6.23	9.91
		Other sites		0.02			0.02
	Poynton subtotal		0.02	3.68	0.00	6.23	9.93
Sandbach (20.00)	Site allocations	LPS 53 'Land adjacent to J17 of M6, south east of Congleton Road' (20.00)		4.86		15.14	20.00
		Other sites		0.04			0.04
	Sandbach subtotal		0.04	4.86	0.00	15.14	20.04
Wilmslow (10.00)	Site allocations	LPS 54 'Royal London including land west of Alderley Road' (5.00)		4.48		0.52	5.00
		LPS 55 'Wilmslow Business Park' (6.31)				6.31	6.31
	Other sites		1.62				1.62
	Wilmslow subtotal		1.62	4.48	0.00	6.83	12.93
All Key Service Centres	Key Service Centres Total		6.45	108.45	3.46	165.18	283.54

Table A2.2: Employment land position – Key Service Centres

¹² The overall remaining site area of LPS 44 is 121ha, but the expectation is that up to 70ha will be developed over the plan period.

Local Service Centres

Area (expected level of development (ha))	Type and area (ha)		Take-up to 31/3/20	Commitments at 31/3/20	Losses to 31/3/20	Remainder of allocations (without permission)	Total
Alderley Edge	Site allocations	-				0.00	0.00
	Other sites		0.14				0.14
	Alderley Edge Subtotal		0.14	0.00	0.00	0.00	0.14
Audlem	Site allocations	-				0.00	0.00
	Other sites						0.00
	Audlem subtotal		0.00	0.00	0.00	0.00	0.00
Bollington	Site allocations	-				0.00	0.00
	Other sites		0.01		1.24		1.25
	Bollington subtotal		0.01	0.00	1.24	0.00	1.25
Bunbury	Site allocations	-				0.00	0.00
	Other sites						0.00
	Bunbury subtotal		0.00	0.00	0.00	0.00	0.00
Chelford	Site allocations	-				0.00	0.00
	Other sites			0.15			0.15
	Chelford subtotal		0.00	0.15	0.00	0.00	0.15
Disley	Site allocations	-				0.00	0.00
	Other sites		0.35				0.35
	Disley subtotal		0.35	0.00	0.00	0.00	0.35
Goostrey	Site allocations	-				0.00	0.00
	Other sites						0.00
	Goostrey subtotal		0.00	0.00	0.00	0.00	0.00
Haslington	Site allocations	-				0.00	0.00
	Other sites		0.08				0.08
	Haslington subtotal		0.08	0.00	0.00	0.00	0.08
Holmes Chapel	Site allocations	Site HCH 1 'Land east of London Road' (5.99)				5.99	5.99
		EMP 2.8 'Land west of Manor					0.00

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Area (expected level of development (ha))	Type and area (ha)	Take-up to 31/3/20	Commitments at 31/3/20	Losses to 31/3/20	Remainder of allocations (without permission)	Total
	Lane' (2.30)					
	Other sites	0.78	0.59			1.37
	Holmes Chapel subtotal	0.78	0.59	0.00	5.99	7.36
Mobberley	Site allocations -				0.00	0.00
	Other sites	0.20				0.20
	Mobberley subtotal	0.20	0.00	0.00	0.00	0.20
Prestbury	Site allocations -				0.00	0.00
	Other sites	0.01				0.01
	Prestbury subtotal	0.01	0.00	0.00	0.00	0.01
Shavington	Site allocations -				0.00	0.00
	Other sites	0.90	0.00			0.90
	Shavington subtotal	0.90	0.00	0.00	0.00	0.90
Wrenbury	Site allocations -				0.00	0.00
	Other sites	0.09				0.09
	Wrenbury subtotal	0.09	0.00	0.00	0.00	0.09
All Local Service Centres (7)	Local Service Centres total	2.56	0.74	1.24	5.99	10.53

Table A2.3: Employment land position – Local Service Centres

Other Settlements and Rural Areas

Area (expected level of development (ha))	Type and area (ha)	Take-up to 31/3/20	Commitments at 31/3/20	Losses to 31/3/20	Remainder of allocations (without permission)	Total
Other Settlements and Rural Areas (69.00)	LPS 60 'Wardle Employment Improvement Area' (61.68)		48.00		13.68	61.68
	LPS 61 'Alderley Park Opportunity Site' (0.00) ¹⁴					0.00
	NP Calveley, Site D, Nantwich Road, Calveley (0.00)					0.00
	NP Moston, Site V, Hall Lane empl site (0.00)					0.00
	NP Moston, Site W, Booths Lane MU dev site (0.00)					0.00
	NP Moston, Site X, Dragon's Wharf empl site (0.00)					0.00
	Other sites		9.38	6.07		
	Other Settlements and Rural Areas total	9.38	54.07	0.00	13.68	77.13

Table A2.4: Employment land position – Other Settlements and Rural Areas

All areas

Area (expected level of development (ha))	Type	Take-up to 31/3/20	Commitments at 31/3/20	Losses to 31/3/20	Remainder of allocations (without permission)	Total
All areas (380.00)	All areas total	38.51	186.30	9.58	234.18	468.57

Table A2.5: Employment land position - All areas

¹³ Sites D, V, W and X are not counted as contributing to the employment requirements as they are existing developed sites and are not new employment land.

¹⁴ LPS 61 is not counted as contributing to the employment requirement as it is a redevelopment site and is not new employment land