

Barton Willmore on behalf of Anwyl Homes Limited (Representor ID 1227506)**Examination into the Cheshire East Local Plan****Matter 2****Matter 2: Planning For Growth****Issue: Development at Local Service Centres****Relevant Policies: PG 8 and Site HCH**

Q 11. Is Policy PG 8 consistent with the strategy in the LPS for growth and the spatial distribution of development at the LSCs, and with the relevant provisions of national policy? In particular:

a) Should it include a disaggregation of the indicative levels of development for the LSCs, of 3,500 dwellings and 7ha of employment land, to individual settlements, in order to ensure decisions are plan-led and that the needs of individual settlements are met?

1. Paragraph 8.34 of the LPS sets out clearly that the strategy in relation to LSCs is to *"support an appropriate level of small-scale development that reflects the function and character of individual villages"*.
2. The paragraph goes on to state that the level of growth will be linked to the presence of a clear need and that these needs will be met on sites identified through the allocation of suitable sites through the SADPD, or where appropriate Neighborhood Plans.
3. In the Inspectors Report on the LPS at paragraph 89 they state that the Vision and Strategy of the LPS in relation of LSCs summarised as *"modest growth will take place at LSCs to meet locally arising needs and priorities where they contribute towards maintaining sustainable communities"* was supported. This was the basis upon which this element of the strategy was examined and deemed to be acceptable.
4. Indeed, paragraph 8.77 of the LPS specifically states that:

The figure for Local Service Centres will be further disaggregated in the Site Allocations and Development Policies DPD and / or Neighbourhood Plans.
5. However, the Councils approach as expressed in PG 8 does not conform with this

approach which has been clearly set out in the LPS.

6. The Council's justification is that the remainder of 3,500 attributed to the LSCs not already completed or committed will be accommodated through windfall development and will therefore meet the overall requirement at LSC level.
7. This approach does not reflect two major elements of the LPS.
8. The first is that the housing requirement is "neither a ceiling nor a target" (LPS paragraph 8.73). The second is that the requirement for housing to be directed to each LSC settlement reflective of need (LPS paragraph 8.34).
9. As such, meeting the 3,500 minimum should not be used as a barrier to allocating sufficient homes to meet the local needs of LSC settlements as per the Vision and Strategy of the LPS.
10. This is particularly the case in terms of settlements in the North Cheshire Green Belt, such as Prestbury, which have very limited scope to accommodate windfall development. This is demonstrated by the Prestbury Settlement Report (ED40) that states that there is no suitable brownfield or greenfield land outside of the Green Belt for allocation.
11. If no land is available outside of the Green Belt for allocation, then it follows that there will be a highly limited scope for windfall development.
12. Disaggregation forms one part of the solution to this issue. However, apportioning development to a specific settlement will not practically mean that development will necessarily follow if that settlement is in the Green Belt, no allocations are made, and no Neighborhood Plan is in preparation. This is the case in Prestbury.
13. This is because those settlements that lie outside of the Green Belt will more likely be the focus for windfall development as there is more scope there.
14. The only way to ensure that local needs are met in accordance with the LPS in Green Belt settlements is via suitable allocations.

b) Should it set out indicative housing levels for designated neighbourhood areas, to provide an effective framework for neighbourhood plans?

15. This approach would be suitable for some areas where Neighborhood Plans are at an appropriate stage of development or that will be subject to an imminent review.
16. However, this would not address the issue of the needs of LCS settlements, such as Prestbury, being unmet given that there is no Neighbourhood Plan being prepared.

c) Is it positively prepared and justified in relying on existing commitments and windfall development to meet the indicative level of housing development for LSCs, set in Policy PG 7, rather than allocating additional sites at the LSCs?

17. This policy is not positively prepared as it will not meet the needs of Prestbury, or other LSCs within the Green Belt, required by the Vision and Strategy of the LPS as examined.
 18. The policy is not justified as the alternative of allocating homes within LSCs was discounted based on a justification that runs contrary to the Vision and Strategy of the LPS which was specifically commented on in the Inspector's Report at paragraphs 89 and 90.
 19. This is because it will not result in a sustainable pattern of development reflective of need but result in homes being directed almost exclusively to LSCs outside of the North Cheshire Green Belt, while the need for housing in settlements such as Prestbury will go unmet.
 20. Representations by Barton Willmore on behalf of Anwyl to the Revised Publication Draft set out that only 2.5% of the housing supply, or 82 homes, to meet the 3,500 requirements for LSCs was being provided in Prestbury (based on figures in ED05). This is disproportionately low given its role and function as an LSC.
 21. The SADPD will continue to fail to meet the requirements of the Vision and strategy of the LPS until it allocates sufficient homes within settlements such as Prestbury to meet local needs.
- Q12. Are the other policies in the LPS and SADPD sufficiently flexible to enable the remaining part of the indicative level of housing development for LSCs, set in Policy PG 7, to be met from further windfall sites? Is there any substantive evidence of opportunities for further windfall development on sites within the proposed Settlement and Village Infill Boundaries?***
22. As previously stated, some LSC settlements such as Prestbury, are heavily constrained

by the presence of Green Belt. This constraint is also applicable to many of the other LSCs in the north of the district such as Alderley Edge, Bollington, Mobberley and Disley.

23. Rather than enabling a pattern of development to meet the needs and priorities of settlements and the creation and maintenance of sustainable communities, new housing will simply be focused on settlements that are not currently constrained by Green Belt.
24. The settlement reports for LSCs constrained by Green Belt, such as Prestbury (ED40), Disley (ED29) and Mobberley (ED37) confirm that there are no sites deemed suitable for allocation or safeguarding within these settlements. It follows therefore that there would be no capacity for significant windfall development within Green Belt settlements.
25. The evidence available therefore suggests that LSCs within the Green Belt will not be able to contribute towards meeting the overall requirement set out at PG7, nor their own local needs.

Q 13. Is there a need for further site allocations for housing at the LSCs to be included in the SADPD to ensure the indicative level of housing development set in Policy PG 7 of the LPS will be met in full and the need for affordable housing addressed, in particular at settlements within the North Cheshire Green Belt?

26. Yes. Given the constrained nature of the LSC settlements in the North Cheshire Green Belt further allocations will be required to ensure that they can both contribute towards meeting the level of housing set within Policy PG 7, and meet the requirement of LPS Vision and Strategy to meet local needs for development emanating from these settlements.
27. Sites such as Land South of Prestbury Lane, Prestbury, which is currently proposed to be safeguarded under policy PG 12 under reference PRE 2, would be a suitable allocation that would meet the needs emerging from the settlement.
28. Indeed, this land was proposed for allocation under previous drafts of the SADPD (Initial Publication Draft 2019) for 35 homes. This should be reinstated as it is precisely the kind of allocation that meets the definition set out in the explanatory text of policy PG 2 of the LPS at paragraph 8.34 that states "*an appropriate level of small scale*

development that reflects the function and character of individual villages. Small scale growth may be appropriate where it supports the creation of stronger local communities and where a clear need exists, which is not more appropriately met in a larger nearby settlement.”

29. Land South of Prestbury Lane was assessed thoroughly as part of the Prestbury Settlement Report (ED 40) which concluded that there were no reasons why the land could not be released from the Green Belt and it is suitable for safeguarding.
30. Those same reasons are readily applicable to its suitability for release from the Green Belt as an allocation. It would provide circa 35 homes to meet the needs of Prestbury, which would otherwise go unmet owing to the current wording of PG8 and the presence of Green Belt.

Issue: Safeguarded Land at LSCs**Relevant Policies: PG 12**

Q 15. Is the identification of additional safeguarded land at the LSCs justified to meet the longer-term development requirements of the Borough, taking account of the expectations of the LPS, the potential for the development requirements of Cheshire East beyond 2030 to change under the standard method for calculating local housing need, and the requirement in paragraph 140 of the NPPF that Green Belt boundaries should only be altered where justified by exceptional circumstances?

31. Notwithstanding the points made in relation to questions 11,12 and 13 in terms of the need to allocate Land South of Prestbury Lane, Prestbury, it is appropriate to safeguard this land through the LPS.
32. The expectation of the LPS was for LSCs to accommodate 3,500 homes during the plan period. The provision of housing and employment land and the approach to spatial distribution document (ED05) at Table 12 shows a shortfall of commitments to meet that requirement.
33. As such, it is appropriate to have land safeguarded in appropriate locations to meet that requirement in line with the LPS's strategy if sufficient windfalls identified in PG 8 do not come forward.
34. Given the constraint of the North Cheshire Green Belt it is important that land is available if required to meet any shortfall and meet the requirement for both the LSC's as a whole and the development needs of individual settlements.
35. The SADPD is required to follow the overall strategy of the LPS. This sets a housing minimum housing requirement of 36,000 between 2010 and 2030. This was deemed to be sound through examination in public.
36. While the Standard Methodology sets a lower requirement, until this is formally accommodated within a review of the LPS, or a new strategic level Local Plan, it is not appropriate to use this figure to inform policy decisions for the SADPD.
37. Given the above it is considered that exceptional circumstances exist based on the potential that the housing requirement for the LSCs, and the needs of Prestbury specifically, will not be met based on Policy PG 8. The inclusion of safeguarded land

will mean that this need will be met without the need to amend Green Belt boundaries again. This is in accordance with NPPF paragraph 140

Q16. Is the selection and distribution of sites for designation as Safeguarded Land at the LSCs, as set out in the Local Service Centres Safeguarded Land Distribution Report^[21] and the Settlement Reports for Alderley Edge, Bollington, Chelford, Disley, Mobberley and Prestbury^[22], based on a robust methodology and justified by proportionate evidence and is it consistent with the LPS and national policy?

38. In terms of the distribution of safeguarded land to settlements, the Local Service Centre's Safeguarded Land Distribution Report (ED53) details that a robust approach was taken insofar that 2.73 hectares of safeguarded land is directed to Prestbury via Option 8, the hybrid option.
39. Full commentary on this methodology is available in Barton Willmore's representations dated December 2020 and will not be rehearsed here.
40. In terms of the site specific selection of Land South of Prestbury Lane, Prestbury, the Prestbury Settlement Report (ED40) correctly states that there are no sites available in the settlement that make 'no contribution' to the Green Belt.
41. The Site has been assessed as having a 'contribution' to the Green Belt. This is the lowest assessed level of impact within the settlement.
42. A total of 5 sites were identified as making a 'contribution' in terms of their impact on the Green Belt. These have been robustly assessed in terms of their suitability for safeguarded as part of ED40. Three of these have been discounted for factors including heritage impact, flood risk, landscape impact.
43. The only significant issues raised in the assessment of Land South of Prestbury Lane were the fact that it was not brownfield and the proximity to employment uses. However, given that there was no brownfield land assessed as available, this is not a significant issue. In addition, the distance to employment reflects Prestbury in that employment opportunities are accessible by public transport rather than being present in Prestbury.

^[21] Core document ED53

^[22] Core documents ED21, ED24, ED26, ED29, ED37 and ED40

44. As such, the selection of Land South of Prestbury Lane for safeguarding is entirely justified based on the robust assessment undertaken, notwithstanding earlier points that it should in fact be allocated.

Q 17. How have the cumulative impacts of the future development of the sites proposed for designation as Safeguarded Land been considered, such as on the highway network, nature conservation assets and the green infrastructure network? What evidence is available to demonstrate this?

45. Barton Willmore's representations on the Revised Publication Draft, dated December 2020, includes technical notes on highways, ecology, and flood risk and drainage as well as a Promotional Document which outlines how the site could be designed and delivered.
46. As previously stated, there are no existing allocations within Prestbury and no significant commitments present. It is therefore not anticipated that there would be any cumulative impacts of the development of the Site.

Q18 Have exceptional circumstances for removing each of the eight Safeguarded Land sites from the Green Belt been fully evidenced and justified, and are the sites defined by boundaries using physical features that are recognisable and likely to be permanent?

47. The response to questions 14 and 15 covers matters concerning the exceptional circumstances of removing land for safeguarding within Prestbury generally and for the Site specifically and these will not be repeated here.
48. The Site is bound to the west, south and south-east by established residential development, with Prestbury Lane forming the northern boundary of the Site, resulting in it being fully contained by clearly defensible boundaries.