



Matter 2: Planning for Growth

Examination of the Cheshire East Local Plan Site
Allocations and Development Policies Document

for Mr B Batley

Emery Planning project number: 17-087

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1. Introduction

- 1.1 This hearing statement is submitted on behalf of Mr B Batley in relation to Matter 2: Planning for Growth and comments on question 19 only.

2. Development at Key Service Centres (sites CNG1, MID 2 & 3 and PYT 1,3 &4)

Q19. Is the proposal to allocate further sites for housing and employment at the Key Service Centres of Congleton, Middlewich and Poynton justified and consistent with the strategy for the spatial distribution of development in the LPS?

- 2.1 No.
- 2.2 Policy PG 1 of the CELPS: "Overall Development Strategy" states that a minimum of 36,000 dwellings and a minimum of 380 ha of employment land will be provided between 2010 and 2030.
- 2.3 Policy PG 2 of the CELPS: "Settlement Hierarchy" states:
- "In the Principal Towns of Crewe and Macclesfield, significant development will be encouraged to support their revitalisation, recognising their roles as the most important settlements in the borough. Development will maximise the use of existing infrastructure and resources to allow jobs, homes and other facilities to be located close to each other and accessible by public transport."*
- 2.4 Policy PG 7 of the CELPS: "Spatial Distribution of Development" sets out the development that settlements are expected to accommodate. With reference to the Key Service Centres PG7 expects all 9 of the Key Service Centres to accommodate both new employment and new homes.
- 2.5 Policy CNG1 allocates 0.95 hectares of employment land at Alexandria Way, Congleton, 50 new homes to the east and west of Croxton Lane and 75 new homes at Centurion Way, Middlewich, 80 homes at Poynton Sports Club, 20 homes at Poynton High School and 50 homes at the Former Vernon Infants School, Poynton. No other allocations are proposed for the Key Service Centres.

- 2.6 The lack of allocations in other Key Service Centres is inconsistent with the strategy for the spatial distribution of development in the LPS.
- 2.7 With particular regard to Knutsford, Policy PG7 states that Knutsford is expected to accommodate in the order of 15 hectares of employment land and 950 new homes. Table A.7 of the LPS identifies that this will be met through the provision of 1.49ha of employment land through the SADPD. However, the SADPD does not propose any employment allocations in Knutsford.
- 2.8 The CELPS only considered the allocation of sites which were 5ha or 150 dwellings or more. Smaller sites were automatically discounted on the basis of their size as they did not meet the threshold (stage 3 of the site selection methodology). Smaller sites are to be assessed and allocated through the SADPD. Various parties at the examination of the CELPS identified that the application of the 150 dwelling / 5ha threshold meant that reasonable alternatives (i.e. smaller sites) were not considered. However, the Inspector examining the CELPS accepted the Council's approach on the basis that smaller sites would be considered through the SADPD. Paragraph 162 of the Inspector's report states:
- "Developers and landowners will have the opportunity to put forward smaller "non-strategic" sites when the SADDPD is prepared. Proposed site allocations account for over 50% of overall housing provision, but along with existing completions and commitments, the CELPS-PC provides for over 90% of the currently identified development requirements up to 2030. This leaves a balance of some 3,300 dw and 15ha of employment land to be identified in subsequent plans, including the SADDPD and Neighbourhood Plans, providing sufficient flexibility and choice."* (our emphasis)
- 2.9 There was therefore a clear expectation from the Inspector that smaller sites amounting to at least 15ha of employment land would be considered and allocated through the SADPD, allowing them to be properly considered, and furthermore that the allocation of this quantum of smaller sites would provide the necessary level of flexibility and choice. Had the Inspector understood that the Council would actually allocate significantly less land for development through the SADPD than established through the CELPS, he may have drawn very different conclusions on the issues of housing and employment land supply, and whether reasonable alternatives had been properly considered.
- 2.10 In terms of supply, the "Knutsford Settlement Report" dated 29 April 2021 (ref: ED 34) states that at 31st March 2020 there had been just 0.23 ha of employment land take up. However, it claims

that the supply of employment land from the allocated sites in the CELPS equates to 14.63ha, comprising 7.13 hectares at Parkgate Extension and 7.5 hectares at land west of Manchester Road. On the basis that the total supply of completions and commitments totals 14.86ha, the SADPD does not propose any allocations.

2.11 We set out in our original representations in December 2020 that, the capacity of the employment sites identified above has been over-estimated as follows:

- land west of Manchester Road obtained planning permission in May 2020 (LPA ref: 19/0032M) for 60 dwellings and “up to” 7.5 hectares of employment land. However, the land use plan submitted with the application only provides for 6.75ha of employment land. The site is available for no more than 6.75ha.
- The Knutsford Settlement Report claims that the capacity for the Parkgate Extension has increased from 6ha as identified in the CELPS to 7.76ha (see footnote 3 at paragraph 3.9. There is no evidence or justification to support such an assumption. The CELPS allocated the site for 6ha of employment land. A planning application has recently been approved, and the stated site area was 6.4ha. The approved planning application features an ecological buffer area comprising 0.46ha. Page 5 of the Committee Report provides the following assessment under the principle of development:

“The application site forms part of LPS37, Parkgate Extension, Knutsford in the CELPS, which includes provision for 6 hectares of employment land. The required ecology buffer to the north of the site, reduces the available employment land to just below 6 hectares on this 6.4 hectare site, and as such is considered to fulfil the employment allocation for this strategic site.” (our emphasis)

2.12 It is therefore not clear how the figure of 7.76ha has been arrived at. If the capacity is higher than 6ha, then this needs to be robustly evidenced and justified. No such evidence has been put forward, and therefore the assumed capacity should be 6ha.

2.13 Reducing the capacity of the above sites results in a shortfall of 1.88ha (i.e. $7.13 - 6.75 + 7.5 - 6$).

2.14 Additional allocations are required in Knutsford to address the shortfall of approximately 2ha, and deliver the 15ha of employment land required by the CELPS. These should comprise of smaller sites which would, as anticipated by the CELPS Inspector, increase choice and flexibility in the supply.

2.15 We therefore consider that approximately 1.5ha of employment land, in the form of smaller sites, should be provided in Knutsford irrespective of whether the Council can demonstrate a supply of 15ha of employment land.