

**Norman Braithwaite of [REDACTED]
responding to the Inspector's questions 15, 16 and 18 in the MIQs in
relation to Matter 2 – Planning for Growth.**

Safeguarded Land at LSCs (Policy PG 12)

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? **No, it is not justified.***

Paragraph 136 of the National Planning Policy Framework (2019) states:

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified,

The Council is required to prove a case for “**exceptional circumstances**” in order to remove land from the Green Belt. That case has to be fully evidenced and justified.

The Council has not provided the evidence base prepared in support of the draft SADPD that sets out an up-to-date assessment of the necessity for the further release of land from the Green Belt and its designation as safeguarded land. There is no evidence put forward to demonstrate the “exceptional circumstances”. So, the case put forward by the Council does not meet the criteria.

The identification of any additional safeguarded land is not justified.

16. *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 and the Settlement Reports for Alderley Edge, Bollington, Chelford, Disley, Mobberley and Prestbury, based on a robust methodology and justified by proportionate evidence and is it consistent with the LPS and national policy? **Not as far as Prestbury is concerned.***

The reason why I have commented on this question is that I lived in Prestbury Lane for 15 years, so I have very local knowledge. The case for the Prestbury Lane site is very weak. The RAG analysis is flawed as is demonstrated by the document submitted on behalf of the Prestbury Lane Resident's group at the previous stage of the consultation process *1255384-The-Prestbury-Lane-Residents-Group-RPD.pdf*.

Another example of the lack of robustness is the comments about access to the village. Despite what the developer has told the Council, there is no path or right of way from the proposed site to Heybridge Lane.

So, the only pedestrian access is along Prestbury Lane. I only walked this, reluctantly, a few times to walk to the station, and can tell you that, even 30 - 40 years ago, it was terrifying, especially in the dark. It is narrow, has no pedestrian walkway and has vertical stone walls on either side. It slopes steeply and is slippery most of the year. The road is too narrow to allow for a pedestrian walkway to be made; it is very dangerous and is not used by pedestrians.

A case of “exceptional circumstances” has clearly not been made. The argument seems to be that other sites are worse rather than that this site has “exceptional circumstances”.

The selection of the Prestbury lane site is not based on a robust methodology and is not justified by proportionate evidence.

18. 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?

I have commented on this in my answer to question 16.

Norman Braithwaite

24/09/2021