

HEARING STATEMENT FOR THE EXAMINATION OF THE CHESHIRE EAST LOCAL PLAN SITE ALLOCATIONS AND DEVELOPMENT POLICIES DOCUMENT

MATTER 2 – PLANNING FOR GROWTH

On behalf of the Disley Sustainable Development Group

Contents

1. Introduction
2. Response to Question 15
3. Response to Question 16
4. Response to Question 18

1. Introduction

- 1.1. This Hearing Statement is prepared by Broadgrove Planning & Development Ltd (Agent ID – 1255471) on behalf of our client Disley Sustainable Development Group (Representor ID – 1255474) and is submitted as evidence as part of the examination into the Cheshire East Site Allocations and Development Management Policies Document (SADPD).
- 1.2. This Statement relates to Matter 2: Planning for Growth and the issue of Safeguarded Land at Local Service Centres (Policy PG 12). Responses are provided in relation to questions 15, 16 and 18 prepared by the Inspector, which will form the basis of the Examination Hearings.
- 1.3. This statement should be read in conjunction with our representations which set out our full case and were submitted in relation to the Revised Publication Draft of the SADPD in December 2020.

2. Response to Question 15

2.1. This section of our response on the matters raised by Question 15 in the Inspector's document:

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?

2.2. Local Plan Strategy (LPS) expectations of the Local Service Centres (LSCs) for the period 2010 to 2030:

"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".

2.3. LPS Policy PG7 provided indicative housing and employment growth figures for the LSCs: to accommodate in the order of 3,500 new homes and 7 hectares of employment land.

2.4. The Council are obliged to justify any additional safeguarding land within the SADPD on the basis that it is necessary, and in accordance with the NPPF and the LPS. It is not sufficient for the Council to rely on the LPS which was adopted in July 2017 (and therefore the evidence base informing this plan predates this) to identify the shortfall of 13.6 hectares (not identified in the LPS). Any additional safeguarded sites need to be identified based on an up-to-date understanding of need.

2.5. Given that the Council have not produced an assessment to justify the need to identify further safeguarded land in the preparation of the Site Allocations and Development Policies Document (SADPD), any further removal of Green Belt land to be identified as safeguarded land to meet future development needs has not been fully justified.

2.6. In relation to the potential for housing need to change beyond the current plan period under the standard method for calculating housing need. It is highlighted that the standard method sees an annual fall from 1,800 dwellings to 1,068. This is a 41% drop in requirement. In the context of this fall in housing requirement, it has not been justified that the need for housing land will be required at the rate envisaged by the LPS. Such evidence is necessary to justify

the exceptional circumstances to take land out of the Green Belt. Current rates of completions and commitments are more than the levels required by the LPS (Housing Monitoring Update 2020/21). Current allocations and the safeguarded sites within the LPS (along with windfall sites), are likely to be sufficient to meet housing requirements beyond the current plan period. As such the identification of further sites within the SADPD is not justified.

3. Response to Question 16

3.1. This section of our response on the matters raised by Question 16:

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?

3.2. The LPA's approach of distributing land across the LSCs is flawed and conflicts with the NPPF and LPS. The theme of sustainable development running through the NPPF and the vision for LSCs in the LPS has been ignored by the LPA in the proposed distribution.

3.3. Para 9 of the NPPF states "Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area"

3.4. As set out in Para 4.4 of our representations, we assessed the evidence base against the principles of paragraph 9 of the NPPF and concluded that the current proposed distribution of safeguarded land in the SADPD conflicts with the NPPF and LPS as it does not promote a sustainable pattern of development.

3.5. In order to demonstrate how the distribution fails to follow the evidence, as well as key planning principles, our analysis considered the attributes of Local Services Centres, and in particular Alderley Edge and Mobberley, and compared them to Disley.

3.6. Alderley Edge is the most sustainable of the LSCs in the north of the District. The LPA evidence base also demonstrates that Alderley Edge has the most employment, largest affordable housing need, least amount of out commuting, greatest affordability issue and has to date contributed far less towards the provision of new housing across the LSCs than other less sustainable settlements.

3.7. In comparison Disley is considerably less sustainable. However, the SADPD has sought to safeguard more land in Disley than in Alderley Edge. Disley has a lower population and has experienced significantly lower historical population growth (-1% 2001-2010 compared with +10% in Alderley Edge and + 20% in Mobberley). Disley has also provided more house completions (2010-2021) and has more committed housing than Alderley Edge. As can be seen in the table below taken from the Housing Monitoring Update 2020/21 (March 2021), Alderley

Edge has seen a fall in the housing completions and commitments since our representations were submitted in December 2020, whereas there has been an increase at Disley.

| | Alderley Edge | Disley |
|--|----------------------|---------------|
| Housing Completions (2010-20) and Commitments | 165 | 231 |
| Housing Completions (2010-21) and Commitments | 163 | 234 |

Completions and Commitments.

3.8. Disley also has less of an issue with affordability. Employment in Disley is considerably less and it has a high net outflow of commuters. Disley has no public transport or major direct road links to the major employment centres in Cheshire East where most of the commuters from the settlement travel to for work. The provision of further housing will exacerbate these patterns and is therefore unsustainable, contrary to the NPPF and the LPS. New housing should be planned elsewhere in more sustainable locations and in settlements with more employment or closer to employment centres.

3.9. In relation to the affordability point it is helpful to consider the latest data from the Cheshire Homechoice housing waiting list. As set out in the extracts below there are currently 323 people on the list for Alderley Edge (compared to 301 when we provided our representations in December 2020). The figure for Disley is 95 (compared to 91 in December 2020).

| First Choice | How many bedrooms do you require? | | | | | | Grand Total |
|---------------|-----------------------------------|-----|----|----|----|----|-------------|
| | 1 | 2 | 3 | 4 | 5 | 5+ | |
| Acton | | 6 | 1 | 3 | 1 | | 11 |
| Adlington | | 4 | 2 | 1 | | | 7 |
| Alderley Edge | | 150 | 89 | 53 | 18 | 13 | 323 |
| Disley | | 53 | 20 | 10 | 6 | 6 | 95 |

3.10. The need for affordable housing was already worse in Alderley Edge compared to Disley, but these figures demonstrate that the affordable demand is growing more quickly in Alderley Edge as well.

3.11. It is considered that the proposed distribution conflicts with the LPA's own evidence base which provides clarity on where the most appropriate locations should be if there is to be safeguarded land in the North of the Borough. The most sustainable approach and sound planning strategy would be for the additional safeguarded land to be provided in the most

sustainable LSC (Alderley Edge). The entire safeguarded land requirement from Disley (2.24 hectares) should be redistributed to Alderley Edge and a lesser extent Mobberley. These settlements are not currently proposed to have a level of safeguarded land that matches their demographic trends and sustainability.

4. Response to Question 18

4.1. This section of our response on the matters raised by Question 18:

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?

4.2. One site has been identified to meet the safeguarded land requirements for Disley. Revised SADPD Policy PG12 designates site DIS 2 'Land off Jacksons Edge Road', Disley as 2.43ha of safeguarded land.

4.3. It is considered that the SADPD fails to fully evidence and justify the removal of the Disley safeguarded land from the Green Belt. NPPF Para 141 requires the strategic policy making authorities to demonstrate fully that all other reasonable options for meeting its identified need for development have been examined. Our representations demonstrate that the distribution of safeguarded land around the LSCs is flawed, and the strategy will not meet the development needs of certain settlements nor achieve the sustainability criteria. The LPA's own evidence base sets out that alternative LSCs, specifically Alderley Edge, should be accommodating larger levels of safeguarded land.

4.4. As set out previously, the Council are obliged to justify any additional safeguarded land through the SADPD on the basis that they it is necessary in accordance with the NPPF and the LPS. The Council cannot rely on the LPS which was adopted in July 2017 to identify a shortfall of 13.6 hectares. Any additional safeguarded sites need to be identified based on an up-to-date understanding of need.

4.5. Given that the Council have not produced an assessment to justify the need to identify further safeguarded land in the preparation of the SADPD, any further removal of Green Belt land to be identified as safeguarded land to meet future development needs has not been justified.