

Gladman Developments Ltd

**Cheshire East Local Plan Site Allocations and Development Policies
Document**

Matter 2 Hearing Statement



September 2021

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Matter 2: Planning for Growth

Development at Local Service Centres (Policy PG8 and Site HCH 1)

1.1 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?

1.1.2 Yes. Policy PG 8 has removed reference to the distribution of development across individual Local Service Centres (LSCs) as previously consulted upon and does not seek to allocate any land for housing development in the LSCs. This deviates from the approach taken in the previous iteration of the Cheshire East Local Plan Site Allocations and Development Policies Document (SADPD) which identified a housing figure in each of the LSCs. The Council's justification behind this decision is that the 3,500 dwellings previously expected to be delivered in the LSCs are now anticipated to be met through windfall development going forward.

1.1.3 Gladman are strongly opposed to this decision as it takes no account of the individual circumstances of settlements and their individual housing needs. Furthermore, the Cheshire East Local Plan Strategy (LPS) is clear at paragraph 8.73 that these figures are intended as a guide and are not considered as a ceiling. The SADPD needs to recognise the role that LSCs play in meeting housing needs and appropriate growth apportioned to them and should not be precluded from delivering additional housing land to meet identified housing needs.

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

1.1.4 Yes. It would be useful if the SADPD provided indicative housing levels for designated neighbourhood areas which are either in the process of preparing or reviewing neighbourhood plans to provide an effective framework for Neighbourhood Plan Steering Groups to work towards. However, it must be remembered that such figures should only be

described as the minimum starting point and not a ceiling or target to be reached to ensure compliance with the LPS and this should be reflected in the policy wording.

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?

- 1.1.5 No. The purpose of the SADPD was to identify additional housing land to meet the needs of the LSCs. It is not positively prepared or justified to rely on existing commitments and windfall development to meet the indicative level of housing required. Gladman consider additional housing land should be identified across the settlement hierarchy to provide assurance that the overall housing requirement will be delivered in full. Indeed, there may be circumstances where planning permissions lapse, sites do not progress, the impact of the ongoing Covid-19 pandemic and, as such, the allocation of additional housing land for residential development in the SADPD will provide a positive mechanism for such circumstances.

Development at Key Service Centres (Sites CNG 1, MID 2 & 3 and PYT 1, 3 & 4)

- 1.2 **Based on the evidence set out in the SA, the Site Selection Methodology Report (SSM) and the relevant Settlement Reports, are sites CNG 1, MID 2, MID 3, PYT 1, PYT 3 and PYT 4 justified as appropriate sites for employment and housing respectively, taking into account the reasonable alternatives?**

- 1.2.1 Gladman do not consider that the proposed allocations at Poynton have been considered equally when taking account the reasonable alternatives available. In this regard, Gladman have a land interest in Poynton for residential development and associated community infrastructure.

- 1.2.2 The development of sites PYT1, PYT3 and PYT4 all require the development of existing playing fields and constitute a loss of land. Indeed, it is noted that Sports England has submitted a number of representations to the revised SADPD regarding the Poynton allocations, raising significant concerns as to the deliverability of the proposals to compensate for the loss of sports facilities which would occur through the development of the three proposed housing allocations.

- 1.3 **In light of the evidence in the Poynton Sports Mitigation Strategy, would the proposals for housing development on Sites PYT1, PYT3 and PYT 4 and the provision of replacement playing fields and sports facilities on land within the Green Belt at Site**

PYT2 north of Glastonbury Drive, meet the policy requirements of Sports England as a statutory consultee and be consistent with national policy? Given the need to replace the playing fields and sports facilities in advance of commencement of housing development is there a reasonable prospect that three sites will be available and developable for housing within the plan period?

- 1.3.1 Sports England are best placed to answer the above question as a statutory consultee. However, Gladman raise concerns with the fact that housing delivery on these sites is contingent on the pre commencement of the replacement facilities in advance of any residential development, therefore casting doubt on whether these sites can be considered available, deliverable and developable now.
- 1.3.2 Accordingly, there is greater need for flexibility through the allocation of additional housing land in Poynton to provide certainty that dwelling numbers will be delivered within the town.

Settlement boundaries (Policy PG 9)

- 1.4 Is the principle of defining Settlement Boundaries consistent with the strategic policies in the LPS and with national policy in enabling the delivery of sustainable development?**
- 1.4.1 The LPS establishes the principle of defining settlement boundaries through LPS Policy PG 6. The SADPD seeks to implement those boundaries. However, when read in conjunction, these policies unnecessarily limit the amount of growth which a settlement could accommodate to a narrow set of circumstances (i.e. replacement dwellings, infill development etc). This does not accord with the positive approach required by the National Planning Policy Framework (NPPF) and the presumption in favour of sustainable development (paragraph 11(d)).
- 1.4.2 Indeed, the LPS states at paragraph 8.34 that:
- "Development will be restricted to locations well related to the built-up extent of these settlements. The identification of such sites will be achieved through the allocation of suitable sites and/or the designation of settlement boundaries addressed as part of the Site Allocations and Development Policies Development Plan Document and/or in Neighbourhood Plans, where these come forward."* (Emphasis added)
- 1.4.3 As currently drafted, the SADPD is heavily reliant on existing housing commitments and does little to provide additional allocations to enable the flexibility for the SADPD to respond to changing circumstances. In this regard, a criteria-based approach is required to

ensure flexibility and provide an opportunity for sites not identified by the SADPD to come forward in situations where there is a shortfall in housing land supply. Such an approach, as outlined in section 4.2 of Gladman's representations to the Regulation 19 consultation, would enable the level of flexibility required.

1.5 Will the Settlement Boundaries defined on the Draft Policies Map be effective in enabling further windfall sites to come forward, to meet the remaining unallocated element of the indicative level of housing development at the LSCs, and elsewhere in the borough?

1.5.1 No. The settlement boundaries, as defined on the draft policies maps, will likely act to prevent further windfall sites from coming forward outside these boundaries to meet the remaining unallocated element of the indicative housing requirement.

1.5.2 No evidence has been submitted by the Council to demonstrate that the unallocated element of the indicative level of housing development is able to come forward within the proposed settlement boundaries in individual settlements.

Local Green Gaps (Policy PG 14)

1.6 With particular reference to the Council's response to the Inspector's Initial Question 6, does Policy PG 14 serve a clear purpose in providing a consistent policy approach to the protection of local green gaps or green wedges identified in Neighbourhood Plans and the consideration of development proposals within them or will it unnecessarily duplicate the policies and proposals of those plans?

1.6.1 Gladman do not consider that Policy PG 14 provides a clear purpose in providing a consistent policy approach to the protection of local green gaps and/or green wedges identified in neighbourhood plans.

1.6.2 Gladman do not object to the principle of Neighbourhood Plan Steering Groups identifying land deemed worthy of protection, however, this must be on the provision that it does not unnecessarily act to prevent the delivery of sustainable growth opportunities from being delivered. In this regard, Policy PG 14 should be modified so that it sets out clear parameters for such designations and in what instances development could come forward in these designations in order to provide clarity to Neighbourhood Plan Steering Groups the scale of local gaps which could be adopted and the type of development which could be located in such designations. Indeed, Gladman consider that sustainable development opportunities can often be located in such designations where development opportunities do not result

in either the physical and/or visual merging of settlements and the policy should be reworded to reflect this.

First Homes and Exception Sites

- 1.6.3 Gladman note that there is no provision for First Homes within the Submission version of the SADPD. First Homes are the government’s preferred discounted market tenure and a minimum of 25% of all affordable housing units should be First Homes delivered by developers through planning obligations.
- 1.6.4 First Homes is a new scheme designed to help local first-time buyers and key workers onto the property ladder, by offering homes at a discount of a minimum of 30% against the market value. The Government proposes to amend paragraph 72 of the NPPF 2021, replacing ‘Entry Level Exception Sites’ with ‘First Homes Exception Sites’. Councils are required to support the development of exception sites, not allocated in local plans, which provide for First Homes led development.
- 1.6.5 Planning Practice Guidance (PPG) sets out guidance on the way in which the 25% First Homes requirement should be applied where existing policies are in place that specify the tenures of affordable housing that should be delivered on residential sites.
- 1.6.6 Gladman recommend that a new First Homes policy is inserted into the SADPD at the Main Modifications stage or through an early update to the SADPD to require 25% of affordable homes ‘for sale’ to be provided as First Homes in accordance with the Written Ministerial Statement published on 24th May 2021 and associated First Homes PPG.