

Hearing Position Statement by
Tetra Tech Planning
on Behalf of Jones Homes

Hearing Session 1 (Day 1) and Hearing Session 2 (Day 2)

Representation on Matters Related to Poynton
Proposed Allocations PYT1 and PYT2 Only

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Summary of matters addressed in this Statement:
Matter 1 – Question 5 in NS-08 [Inspectors-MIQs-Part1]
Matter 2 – Question19 in NS-08 [Inspectors-MIQs-Part1]
Matter 2 – Question 20 in NS-08 [Inspectors-MIQs-Part1]
Matter 2 – Question 21 in NS-08 [Inspectors-MIQs-Part1]
Matter 2 – Question 22 in NS-08 [Inspectors-MIQs-Part1]
3. General comments in relation to Matter 2

1. MATTER 1 - LEGAL COMPLIANCE

5. Has the SADPD been prepared in accordance with the Council's Local Development Scheme (LDS). Are there any obvious omissions from the submitted DPD, in terms of its overall scope as described in the LDS and the non-strategic policies and site allocations delegated to it by the LPS?

Specifically, is there a need for mineral safeguarding and the allocation of sites for mineral extraction to be included in the SADPD, given the expectations of Policy SE 10 of the LPS?

- 1.1 The LPS in Paragraph 13.106 sets out how the Council proposes to progress defining Mineral Safeguarding Areas (MSAs) through a Minerals and Waste DPD. Site PYT2 does not fall inside any of the mineral resource zones identified on the 'Mineral Resources in Cheshire Map', Figure 13.4 of the LPS, which would provide the basis for defining the MSAs. Therefore, it is considered that there are no justified grounds for PYT2 to be safeguarded for mineral extraction and the proposed allocation of PYT2 for sports and leisure development remain appropriate.

2. MATTER 2 – PLANNING FOR GROWTH

19. 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 Jones Homes considers the allocation of PYT1 for housing to be entirely consistent with the strategy for the spatial distribution of new housing as set out in Policy PG7 of the LPS. The Council's justification for allocating additional housing sites in Poynton is clearly set out in Paragraphs 4.7 to 4.12 of document 'The provision of housing and employment land and the approach to spatial distribution' [ED05].

- 2.2 This demonstrates that the Council has taken an objective and hierarchical approach in line with Policy PG7. The borough's 2 principal towns (PTs) were the primary focus for new housing and employment development, but the expected level of new housing for both these PTs have now been met. Key Service Centres (KSCs) form the second tier of settlements for the location of new housing and of the 9 KSCs only Poynton, Middlewich and Handforth have not yet met the expected levels of development as set out in Policy PG7.
- 2.3 The allocation of PYT1 would help to meet the identified need of 650 dwellings in Poynton as listed in PG7.
- 2.4 The site is located within the settlement boundary and in a sustainable location for housing. The site is allocated for housing in the Poynton Neighbourhood Development Plan (NDP) and would fund much needed enhanced and additional sports facilities to be provided at PYT2.
- 2.5 The Poynton Sports Mitigation Report [CEC/02a] references the identified shortfalls in Poynton for:
- i) youth football including grass pitches and a full size 3G pitch;
 - ii) significant shortfall in match equivalent sessions for cricket;
 - iii) shortfall for Poynton Lacrosse Club
 - iv) the two existing pitches at Poynton Sports Club *"are considered to be too small by England Lacrosse and one of them is considered to be dangerous due to its proximity to the clubhouse on the site. Poynton Lacrosse Club reports that it could field up to four additional junior teams if it had access to more available pitches..."*
 - v) *"All users of the site that were consulted with as part of the PPS report that the clubhouse is poor quality and in need of modernisation."*
- 2.6 We also have a renewed letter of support from Poynton Sports Club setting out their continued support for the relocation of their sports facilities to PYT2 and why it is necessary. In their letter they state that the need to relocate to PYT2 has only further increased since the original promotion of the site. Many of the junior teams (currently 32 teams) are not able to train at the Club and *"will never play a game at 'their club' such is the demand."*
- 2.7 The allocation of PYT1 for housing and provision of enhanced replacement sport facilities at PYT2 is therefore fully justified and consistent with the LPS and the NDP.

20. Based on the evidence set out in the SA, the Site Selection Methodology Report (SSM) [ED07] 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?

- 2.8 Our response to Question 19 affirms that it is appropriate to allocate additional housing in Poynton. The assessment carried out by the Council on the different promoted sites in and around Poynton is summarised well in [ED39] and makes it clear that PYT1 is the most appropriate housing allocation site when considered against the reasonable alternatives.

21. In light of the evidence in the Poynton Sports Mitigation Strategy, would the proposals for housing development on Sites PYT1, PYT3 and PYT4 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 the commencement of housing development, is there a reasonable prospect that three sites will be available and developable for housing within the plan period?

- 2.9 Yes, the proposed replacement facilities for Poynton Sports Club would meet Sport England policy requirement and would be consistent with national policy. The proposals set out in '752008 Jones Homes relocation of Poynton Sports Club delivery statement'[Comment ID: RPD800] (the 'Delivery Statement') during the consultation on the Revised SADPD clearly show the provision of better quality and greater quantity playing fields. The scheme would therefore exceed the requirements of Exception 4 of the Sport England policy guidance. As part of the Council's site selection process Sport England states that the site area compares favourably with the existing Sports Club site and is well located (refer to bullet point 1 of Paragraph 4.70 of Document ED39).
- 2.10 The NPPF (2021) in Paragraph 99b also supports the principle of providing replacement sport provision to mitigate the loss of existing playing fields. New outdoor sport facilities in the Green Belt are deemed appropriate in accordance with Paragraph 150 of the NPPF and Paragraph 149 makes allowance for the construction of new buildings in the Green Belt for the provision of appropriate facilities for outdoor sport or recreation.
- 2.11 The scale, appearance and siting of the new built facilities are to be assessed during the planning application stage, but it is our considered view that a building with a footprint of circa 794sq.m would be appropriate for a 10-hectare sport complex.
- 2.12 It would also have the potential to mitigate for the quantitative losses at PYT3 and PYT4 as mooted in the Sport Mitigation Strategy.
- 2.13 Jones Homes broadly welcomes the findings of the Sport Mitigation Strategy [CEC/02a] which has recently been added to the examination library. This

document was produced without any engagement with Jones Homes and therefore provides an independent assessment by suitably qualified agronomists that confirms the deliverability of the replacement facilities at PYT2.

- 2.14 There are some elements of detail included in [CEC/02a] that will need to be discussed with the Council in due course, but nothing that would affect the soundness of the proposed SADPD. On the contrary we would like to see more flexibility around the location and level of 3G pitch facilities to be provided in Poynton, to ensure that these much-needed facilities are delivered.
- 2.15 We believe it would be justified for a self funded full sized 3G pitch to be provided on the PYT2 site irrespective of whether a 3G pitch is to be provided at the High School site. The reasoning for this set out below:
- i) The expansion of Poynton Sport Club in terms of number of teams it can accommodate is currently suppressed by the lack of sufficient facilities to accommodate existing demand.
 - ii) According to Paragraph 4.37 of [CE/02a] a full sized 3G pitch is needed for every 38 teams. The existing number of football teams alone based on 2020 data as set out in Table 4.9 of [CE/02a] is already nearly at this threshold at 37 teams.
 - iii) The new housing will generate additional demand.
 - iv) Poynton Sports Club need a full sized 3G which can accommodate lacrosse as well.
- 2.16 The provision of a 3G pitch at PYT2 would also make it possible to speed up the delivery of the much-needed facilities for Poynton Sports Club and in the process could pave the way for phased delivery of the housing site by making the existing football pitch and tennis courts available for development once these facilities have been provided for on PYT2. The artificial pitches would not be subject to the establishment period required for the grass pitches.
- 2.17 Jones Homes request that the proposed wording to bullet point 3 of proposed Policy PYT1 be revised to provide flexibility for the phased delivery of PYT 1: *“...and Action Plan, and that ~~the~~ any relocated facilityies is fully brought into use in advance of the loss of anythe corresponding existing facilities to ensure continuity of provision.”*
- 2.18 We are confident that the new housing on PYT1 can be completed within the current plan period up to 2030, even without the prospect of phased delivery as set out above. Please find attached below an indicative programme to demonstrate delivery within the Plan period without allowance for phased delivery.

Action	Duration (in weeks)	Start	End
Submission of Application to LPA	1	04/04/2022	11/04/2022
Planning Application Determination Period	78	11/04/2022	06/10/2023
Decision Notice Issued	0		06/10/2023
Judicial Review Period	6	09/10/2023	20/11/2023
Discharge pre-commencement conditions	26	09/10/2023	05/04/2024
Site set up and clearance	2	12/02/2024	26/02/2024
Construction of new grass pitches	20	08/04/2024	26/08/2024
12 month establishment for grass pitches	52	02/09/2024	01/09/2025
Construction of clubhouse building and artificial pitches	34	03/03/2025	03/11/2025
Hand over completed facilities	1	10/11/2025	16/11/2025
Vacant Possession Of Existing Club	1	17/11/2025	23/11/2025
Enabling Works	4	24/11/2025	19/12/2025
Roads & Sewers	8	05/01/2026	02/03/2026
Housing Construction (approx 90 dwellings)	188	02/03/2026	12/10/2029
30th completion	0		12/10/2027
60th completion	0		12/10/2028
last completion (90)	0		12/10/2029

22. Given the requirement for Mineral Resource Assessments to be submitted as part of any planning applications on Sites CNG 1, MID 3 and PYT 2, which may require minerals to be extracted before development proceeds, to avoid sterilisation of the mineral resource, is there a reasonable prospect that:

- a) Sites CNG 1 and MID 3 will be available and developable for employment and housing purposes respectively within the plan period?**
- b) Site PYT 2 will be available for the provision of relocated sports facilities in sufficient time to allow for housing to be provided on the existing Poynton Sports Club site, PYT 1, within the plan period?**

What is the evidence to support this?

- 2.19 The site does not fall in any of the identified mineral resource zones as identified on the 'Mineral Resources in Cheshire Map', Figure 13.4 of the LPS, which would provide the basis for defining the MSAs.
- 2.20 Therefore, it is considered unlikely that mineral extraction would be a prohibitive constraint for developing the site. Nonetheless Jones Homes has instructed a Mineral Resource Assessment by suitably qualified consultants Stephenson Halliday in light of the number of questions raised by the Inspector regarding mineral resources. The findings of the report are summarised below
 - *The sand and gravel deposits are shown to be immediately to both east and west of the site, and not within the site itself. The identified sand and gravel deposits are shown to follow the course of the Poynton Brook, and therefore would be excluded from providing a resource potential.*

- *BGS mineral resource mapping indicates the superficial geology to be Glaciolacustrine Deposits, Devensian – Clay and Silt.*
- *BGS borehole records for a location close to the south western edge of the site indicates topsoil over boulder clay with sand layers to around 14m bgl, below which the Chester Pebble Beds Formation was present to 41m. Refer to Appendix 4.*
- *The site is not in a Minerals Search Area and is shown as within a proposed Sand and Gravel (250 buffer) safeguarding area.*
- *The sports pitches and courts site layout design includes for levelling of the land, and therefore prior extraction does not lend itself to accommodate the site design.*
- *The site is physically bounded to the north, west and east by Poynton Brook and Glastonbury Road to the south which constrains any future growth potential for mineral extraction at the site and the economic viability of extraction.*
- *The use and frequency of HGVs would have an impact on the safety of users on the Bridleway (PRoW) along Glastonbury Drive.*
- *The site lies immediately adjacent to a residential area of Poynton. Mineral extraction in this location is likely to result in adverse amenity effects for residents and visitors to the area, including adverse air quality, noise and visual impacts; please refer to Section 2.3 of this report for further details on NPPF guidance on mineral extraction activities and associated impacts on local receptors. The proposed 250m buffer suggests that a distance of 250 metres is needed between resource and potential new development, and similarly this buffer would be required for the protection of the settlements.*

- 2.21 The report concludes that the overall potential for commercial minerals extraction at the site to be very low.
- 2.22 Site PYT 2 should therefore be considered as being **available and deliverable** for the provision of the relocated sports facilities. A copy of the report has been issued to the Council and the requirement for a Mineral Resource Assessment could be removed from the proposed Policy wording for PYT 2, subject to the Council being satisfied with the content of that report.

3. General Comments in Relation to Matter 2

- 3.1 Concerns have been raised by Gladman in their representations on the Revised SADPD that the development of PYT1 would result in the loss of a 'green lung' for the town. The proposals show the retention of the woodland areas along London Road North and to the north and east of the sports ground. This equates to circa 0.95ha of woodland out of the total 4.37ha site.

- 3.2 The loss of areas of short mown grass (grass pitches) would be mitigated by the provision of gardens and soft landscaping of the new residential estate.
- 3.3 A significant benefit of the proposal is this woodland belt around the site would be brought under one ownership and management would be undertaken and a future management plan produced as set out in the Delivery Statement by Jones Homes. This area of woodland currently has no woodland management plan.
- 3.4 The tree lined frontage along London Road would be preserved in terms of visual amenity.
- 3.5 Savills (on behalf of the Estate of Marques Kingsley Deceased) submit that PYT 1 should be de-allocated due to concerns they have with the potential impact the replacement facilities at PYT2 may have on the Green Belt. Instead, they suggest that 3 Green Belt sites should be released for housing.
- 3.6 The small footprint of built facilities associated with the provision of replacement sports facilities would certainly be less harmful to the Green than allocating Green Belt sites for housing. The release of Green Belt land for housing requires Exceptional Circumstances to justify alterations the Green Belt boundaries, whilst the NPPF makes provision for the development of sports and leisure facilities in the Green Belt, including appropriate built facilities.
- 3.7 Savills then go on to reference case law where sport related development in the Green Belt has been refused. Most notably Boot vs Elmbridge Borough Council. That scheme was for a stadium that would have been 56m long by 29m wide and 8.7m high, therefore dwarfing the proposed club house building which would be much more modest in size. In addition, the site at Elmsbridge was also much less screened than the site at Glastonbury Drive, which benefits from mature tree belts along the north, south and west boundaries.
- 3.7 Each application should be considered on its own merits, but the principle of the development is in accordance with national policy and the NDP for Poynton.
- 3.8 As set out in in Paragraphs 2.1 to 2.7 of this statement, we consider the allocations of PYT1 and PYT2 to be justified. This statement also demonstrates that the proposed allocations of PYT1 and PYT2 are consistent with national policy, can effectively be delivered within the Plan period, and that the Draft SADPD has been positively prepared to help meet the OAN for Poynton, including the delivery of additional enhanced sports facilities on one

consolidated site in the closest possible proximity to the current location of the Poynton Sports Club.

- 3.9 Savills also queries the level of affordable housing to be provided. As stated in the Delivery Statement by Jones Homes the scheme at PYT 1 will provide 30% affordable dwellings.
- 3.10 The scheme layout illustrates that the site can accommodate 90 to 100 units, even when accounting for the 10m buffer to the woodland to the north and east of the site. Therefore, we would request that the proposed allocation for PYT1 be increased to 90 dwellings.