



CEC SADPD Examination Hearing Statement: Matter 2 - Planning for Growth

Land at Heybridge Lane, Prestbury

On behalf of PH Property Holdings Ltd
September 2021

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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Asteer Planning LLP on behalf of PH Property Holdings Ltd (PH Property) and responds to the Matters Issues and Questions for the Examination (MIQs) prepared by the Inspector into Cheshire East Council's (CEC) Site Allocations Development Plan Document (SADPD).
- 1.2 This Hearing Statement relates to Matter 2 – Planning for Growth.
- 1.3 PH Property is an SME housebuilder focused on delivering high quality residential development in Cheshire. Over the past 25 years, PH Property has developed a strong track record of developing housing in Cheshire East and their recent developments include: Alderley Park, Alderley Edge; Somerford Booths Hall, Somerford, Congleton; and Heys Green, Henbury, Macclesfield.
- 1.4 PH Property has submitted representations to previous consultations during the preparation of the SADPD in relation to Land at Heybridge Lane, Prestbury (the site). The site is a sustainable and deliverable site for housing on the edge of the settlement of Prestbury. Part of the site is proposed for Green Belt release (which PH Property strongly supports) and allocated as safeguarded land, Site Reference PRE 3, under SADPD Policy PG 12 'Green Belt and Safeguarded Land boundaries' with the remaining part of the site proposed to be retained within the Green Belt.
- 1.5 Asteer Planning's representations in this Hearing Statement relate to Land at Heybridge Lane, Prestbury and also reflect PH Property's role as an experienced regional housebuilder with various land interests in Cheshire East.
- 1.6 This statement responds to the MIQs related to Matter 2 – Planning for Growth questions 11, 12, 13, 15, 16, 17, 18, 26, 27, 28 and 29. Our response deals with the questions under the relevant Issue heading and includes the full question text for ease of reviewing. Abbreviations follow those used in the MIQs.

2. DEVELOPMENT AT LOCAL SERVICE CENTRES (POLICY PG 8)

2.1 This chapter presents PH Property's representations in connection with the MIQs relevant for the Development at Local Service Centres (LSC) (Policy PG 8).

Question 11: 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?

2.2 The Cheshire East Local Plan Strategy (LPS) was adopted on 27 July 2017. The LPA at paragraph 1.1 states:

1.1 *"The Local Plan is the Statutory Development Plan for Cheshire East and is the basis for determining planning applications. This Local Plan Strategy document sets out the overall vision and planning strategy for development in the borough and contains planning policies to ensure that new development addresses the economic, environmental and social needs of the area. It also identifies strategic sites and strategic locations that will accommodate most of the new development needed".*

2.3 Policy PG 8 of the SADPD is consistent with Policy PG 7 of the LPS so far that it states that: *"The local service centres are expected to accommodate in the order of 7ha of employment land and 3,500 new homes".*

2.4 However, Policy PG 8 further states that: *"It is expected that the housing element will be addressed by windfall going forward, in line with other policies in the Local Plan, and the employment element will include an allocation at Homes Chapel (Site HCH 1 'Land east of London Road') as well as windfall in line with other policies in the Local Plan".*

2.5 It is the Council's windfall housing approach proposed by Policy PG 8 to meeting the housing requirement set by Policy PG 7 of the LPS at LSCs which PH Property objects to on the grounds that it is not consistent with the LPS and is not effective, justified nor positively prepared in accordance with paragraph 35 of the National Planning Policy Framework (NPPF).

- 2.6 The LPS is based on the principle of jobs-led growth. A whole chapter of the LPS makes the case for growth following many years of development restraint in the region (please see Chapter 4, LPS - Document BD 01).
- 2.7 The allocation of a range of strategic development sites in the LPS is seeing growth delivered across the Borough. However, now CEC is at the second, non-strategic stage of the development plan, a more restrained approach (by relying on windfalls only) is being applied in the SADPD, which is inconsistent with the LPS strategy of growth.
- 2.8 Of relevance, paragraph 8.34 of the LPS (Document BD 01) states (with Asteer Planning's emphasis in **bold**):
- 8.34 *"In Local Service Centres and other settlements and rural areas, the Local Plan Strategy approach is to support an appropriate level of small scale development that reflects the function and character of individual villages. Small scale growth may be appropriate where it supports the creation of stronger local communities and where a clear need exists, which is not more appropriately met in a larger nearby settlement. 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.** In the case of Goostrey which adjoins Holmes Chapel, a larger Local Service Centre, it is anticipated that development needs will largely be provided for in Holmes Chapel".*
- 2.9 Furthermore, the LPS stresses its aim to reduce the need to travel as a key part of the plan. This is emphasised in the following places:
- The LPS Vision, which states, *"Well designed new employment and housing development will have been developed to fully meet identified needs in locations that reduce the need to travel"*;
 - Strategic Priority 4, which is focused on *"Reducing the need to travel, managing car use and promoting more sustainable modes"*; and
 - The Vision for LSCs stating, *"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."*

- 2.10 In Prestbury, the evidence base states that, unusually for smaller settlements, Prestbury has a pattern of net in-commuting for work (Paragraph. 3.12, Document ED 53).
- 2.11 The SADPD provides the opportunity to reduce out-commuting through a plan-led approach but instead, the windfall approach proposed will likely exacerbate out-commuting by acting as a moratorium on housing in settlements like Prestbury, which have tightly drawn Green Belt boundaries that shrink wrap the settlement.
- 2.12 Policy PG 8 is not consistent with national policy as whilst the development management system will inevitably deliver an amount of windfall housing, as is evidenced by past delivery rates, leaving the housing requirement for LSCs to be delivered in such a way directly conflicts with the NPPF which advises, *"The planning system should be genuinely plan-led"* (Paragraph 15) and requires plans are prepared with the objective of contributing to the achievement of sustainable development (Paragraph 16).
- 2.13 A windfall led approach risks unsustainable patterns of development delivering growth to areas that have no Green Belt constraints whilst further repressing the housing markets of the North Cheshire Green Belt Settlements.
- 2.14 Prestbury already has the highest median house price of all the LSCs, has experienced a decline in population of working age, and has a significantly greater proportion of the population over the age of 65 compared to the Cheshire East average (page 82, Document ED 53). The lack of forward planning for housing in Prestbury is likely to exacerbate these trends of unsustainable communities.
- 2.15 We acknowledge the Council's position that *"it is inconceivable that additional housing delivery on windfall sites (of all sizes) yet to be granted planning permission, will not occur during the plan period"* (paragraph 11, Document CEC/01). However, it is quite conceivable that a) the level of windfall development relied upon will not occur in the plan period and b) the spatial distribution of windfall developments will not deliver the most sustainable spatial growth. Either consequence would further impact on the sustainability of settlements such as Prestbury which are already experiencing affordability and ageing population issues.

Question 11A: Should it include a disaggregation of the indicative levels of development for the LSCs, of 3,500 dwellings and 7 ha of employment land, to individual settlements, in order to ensure decisions are plan-led and that the needs of individual settlements are met.

- 2.16 Yes, the 3,500 dwellings allocated to the LSCs should be disaggregated to individual settlements to ensure a plan-led approach and deliver sustainable development in accordance with NPPF.
- 2.17 This approach would be entirely consistent with the approach adopted by the Council in preparing its LPS. The LPS sets strategic employment and housing requirements through the Overall Development Strategy in Policy PG 1, identifies the Settlement Hierarchy in Policy PG 2 and sets the Spatial Distribution for Development in Policy PG 7. In setting the spatial distribution for development in Policy PG 7, the LPS identifies the extent of development expected to be accommodated at the Principal Towns and Key Service Centres (KSC). The Council did this to take into account the core planning principles of the NPPF (paragraph 8.75 – Document BD 01) and stated for LSC's that: *"The figure for Local Service Centres will be further disaggregated in the Site Allocations and Development Policies DPD and / or Neighbourhood Plans"* (paragraph 8.77 – Document BD 01).
- 2.18 Prior to the Revised Publication SADPD (Document ED 01a), the Publication Version SADPD (Document ED01d) disaggregated housing provision amongst the LSCs based on a hybrid approach of considerations to determine growth levels, which included: proportionate population growth; proportionate household growth; services and facilities led growth; constraints led; Green Belt led; and opportunity led (Chapter 4 of Document PUB 05, June 2019).
- 2.19 However, the Revised Publication SADPD (Document ED 01a) has deleted a disaggregation approach all together. Instead, disaggregation of the 3,500 dwelling requirement is to be achieved through a combination of dwellings already constructed in this plan period, commitments, and future windfalls.
- 2.20 We recognise that this change in approach may reflect the fact that some LSCs have already come a considerable way to meeting their original housing delivery requirements since the publication of the first draft SADPD, however, over reliance on windfalls to deliver the remainder of the housing requirement to the LSCs is not consistent with the plan-led system required by law and endorsed by government through NPPF.

- 2.21 Policy PG 8 of the Initial Publication Draft SADPD (Document ED 01d) required Prestbury to accommodate 115 new homes during the Plan period. This requirement had been reduced from 130 dwellings in the first draft SADPD (October 2018).
- 2.22 Prestbury has a housing land supply position of 82 dwellings comprising of 51 completions from 2010-2020 and 31 committed dwellings. This is significantly lower than the 115 dwellings proposed for Prestbury within the Initial Publication Draft (ED 01d) and lower still than the 130 dwellings proposed for Prestbury within the first draft SADPD. As the settlement is shrink wrapped by the Green Belt, and the Settlement Report identifies no urban capacity for new dwellings, it is unlikely that windfalls will deliver the shortfall of 33 dwellings identified in the previous draft SADPD (ED 01d) and 48 dwellings identified in the first draft SADPD.
- 2.23 In summary, to ensure sustainable communities within all LSC's, the LSC figure of 3,500 dwellings should be disaggregated and it is proposed that this figure should be 130 dwellings for Prestbury.

Question 11B: Should it set out indicative housing levels for designated neighbourhood area, to provide an effective framework for neighbourhood plans?

- 2.24 Yes. The NPPF and National Planning Policy Guidance (NPPG) require Local Planning Authorities to set a housing requirement figure for designated neighbourhood areas from their overall requirement. Leaving the delivery of the remainder of the LPS Policy PG 7 housing requirement for LSCs to windfalls is not working positively with neighbourhood planning bodies and does not meet the requirements of national policy (NPPF Paragraph 65, and NPPG Paragraph: 009 Reference ID: 41-009-20190509). This is particularly pertinent in Cheshire East which has one of the highest number of Neighbourhood Plans of any local authority in England. Whilst we are not aware of any plans for a Neighbourhood Plan in Prestbury, one could come forward in the remainder of the plan period. With 10 of the 13 LSCs already having plans in place, a housing requirement would clearly assist in any emerging reviews.

Question 11C: 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 in the LSCs?

- 2.25 Policy PG 8 is not effective in settlements such as Prestbury, which are tightly shrink wrapped by Green Belt and have no urban capacity. Policy PG 8 is not justified as there is

a reasonable alternative. The alternative approach is a plan-led approach which would allocate small and medium sized sites in the LSCs to deliver local housing needs.

- 2.26 Instead, the approach by CEC is to leave delivery to market forces and the development management process which is not consistent with the Council's intended approach at the time it prepared its LPS. Paragraph 8.34 of the LPS (Document BD 01) set out at paragraph 2.8 above intended that housing needs would be met through:

"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".

- 2.27 The approach adopted in the SADPD does not ensure delivery of local housing to local communities in a sustainable way and is therefore not consistent with national policy. All but one of the potential sites considered in the Prestbury Settlement Report (Document ED 40) are in the Green Belt. The only non-Green Belt site had capacity for 10 dwellings only. This position is further clarified at Paragraph 4.15 of Document ED 05 which confirms:

"As demonstrated through the Urban Potential Assessment, there are no brownfield sites in Prestbury that could be considered as potential sites for allocation in the SADPD."

- 2.28 This shows that, despite some past windfalls, there is no evidence to support the Council's revised approach to the LSCs housing requirement in meeting the housing needs of each settlement.

- 2.29 Looking at the 31 commitments in Prestbury in CEC's Housing Completions and Monitoring data (p.21 of Appendix 2 – Sites with Planning Permission at - <https://www.cheshireeast.gov.uk/pdf/planning/spatial-planning/researchand-evidence/housing-monitoring-report/hmu-2020-21/appendix-2-sites-with-planning-permission.pdf>), a number of the permissions are for replacement dwellings or dwellings within the grounds of existing dwellings, further demonstrating that there is no available land to deliver new housing sites. Of the sites listed as under construction, all are replacement dwellings and therefore it seems they are shown as net gain in error and if this is correct, the forward supply in Prestbury is in fact just 28 dwellings. Unsurprisingly, none of the supply includes affordable housing.

2.30 In summary, PH Property propose that the most effective and justified approach consistent with the LPS and the NPPF, is for the Council to a) identify the housing requirements of each settlement within the SADPD and b) identify housing allocations through allocation of suitable sites to meet these housing needs. The starting point for these allocations should be the land safeguarded for development and therefore it is proposed that PH Property's Land at Heybridge Lane (site PRE 3) should be uplifted to a housing allocation. Please see PH Property's response to Question 13 below for further information.

Question 12: Are other policies in the LPS and SADPD sufficiently flexible to enable the remaining part of the indicative level of housing development for LSCs, set in Policy PG 7, to be met from further windfall sites? Is there a substantive evidence of opportunities for further windfall development on sites within the proposed Settlement and Village Infill Boundaries?

2.31 There is no flexibility to deliver housing by windfall sites in Prestbury as the settlement is shrink wrapped by Green Belt and the evidence base confirms there is no urban capacity for residential development and all but one of the sites considered in the Settlement Report are in the Green Belt (Document ED 40).

2.32 Given the constraints of local and national Green Belt Policy on new housing development, there is no evidence of opportunities to enable local housing needs in Prestbury to be met.

2.33 Whilst CEC presents windfall data on completions and forward supply to justify their approach, in settlements such as Prestbury, this is unlikely to deliver against identified needs or secure any affordable housing, as the forward supply identified in the latest monitoring data shows supply is largely made up of single dwelling applications and the largest application is for six dwellings. Furthermore, it is also noted that the SADPD proposes to introduce Policy HOU 8 to control Backland Development.

Question 13. Is there a need for further site allocations for housing at the LSCs to be included in the SADPD to ensure the indicative level of housing development set in Policy PG 7 of the LPS will be met in full and the need for affordable housing addressed, in particular at settlements within the North Cheshire Green Belt?

2.34 Yes. A plan-led system is needed to deliver the right type of housing to the right places addressing local, spatial and affordable housing needs.

- 2.35 To address this, the starting point should be to uplift the sites allocated as safeguarded land to residential allocations in the LSCs. PH Property strongly supports the removal of PRE3 from the Green Belt however it proposes that PRE 3 is uplifted to a housing allocation.
- 2.36 The safeguarded sites at Prestbury have been assessed as the most appropriate locations in Prestbury for residential development as assessed in the Prestbury Settlement Report (ED 40) and so are the most appropriate and sustainable sites in Prestbury to be allocated.
- 2.37 Land at Heybridge Lane (site PRE 3) has capacity for approximately 31 dwellings. Development Option 2 of the Development Statement (submitted in support of PH Property's representations to CEC Draft Publication SADPD in September 2019 (Comment Reference PBD1594) shows how the site could be developed.
- 2.38 Development Option 2 shows a layout design including a small area of land beyond the pond and outside of the safeguarded allocation of PRE 3 which includes a further four dwellings.
- 2.39 Option 1 shows how the wider FRD2001 site considered in the Prestbury Settlement Report (ED 40) could accommodate 70 dwellings.
- 2.40 If Site PRE 3 were uplifted to a residential allocation, the remainder of the site (as shown on the Site Location Plan and as assessed under site reference FDR2001 in the Settlement Report), could then be allocated as Safeguarded Land to meet future needs of Prestbury and provide a further 39 dwellings in the future as shown on Option 1 of the Development Statement.
- 2.41 In the LSCs shrink wrapped by Green Belt, we do not consider that windfalls can be relied on to deliver sustainable residential development. In the event that monitoring shows this to be the case, and CEC has a shortfall in housing land supply and delivery, both in the LSCs or plan area as a whole, the SADPD as drafted has no mechanism for the early release of safeguarded land as a remedy to this potential outcome.
- 2.42 Whilst it is PH Property's primary position that its safeguarded site at Heybridge Lane is uplifted to a housing allocation as presented at paragraphs 2.34 – 2.40 above, we also strongly recommend that an early release mechanism for the safeguarded sites is drafted as part of Policy PG 12.

3. SAFEGUARDED LAND AT LSCS (POLICY PG 12)

- 3.1 This chapter presents PH Property's representations in connection with the MIQ's relevant for the Safeguarded Land at LSCS (Policy PG12).

Question 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?

- 3.2 We agree with CEC in their response to the Inspector's questions (Document CEC/01) that the standard method for calculating local housing need does not alter the requirement for safeguarded land allocations in the SADPD.
- 3.3 As CEC set out, the safeguarded land requirement takes account of repressed housing growth to North Cheshire Green Belt Settlements under the current LPS and previous years of restraint under the old local plans.
- 3.4 As set out in the previous chapter, PH Property's position is:

1. The Councils approach to rely on windfall housing development to meet its housing needs in LSC's is not effective, justified nor consistent with the LPS and national planning policy. The SADPD should identify suitable housing sites for allocation at LSCs to meet this housing need. The starting point for housing allocations should be the safeguarded sites. PH Property strongly supports the removal of PRE3 from the Green Belt however it respectfully requests that PRE3 is uplifted to a housing allocation with the remainder of its site safeguarded (please see paragraphs 2.34 – 2.40 above).
2. The proposed SADPD approach to the LSC housing requirement strengthens the case for safeguarded land in LSCs, as with no housing allocations currently proposed, housing delivery will be further constrained in Prestbury and other Green Belt settlements over this plan period. As such, safeguarded land allocations such as PRE3 in Prestbury (and the larger FDR2001 site as assessed in the Settlement Report ED 40) are essential if Green Belt boundaries are to endure beyond the plan

period. Neither the LPS, SADPD or the Local Plan Monitoring Framework (ED54) contains a review mechanism to allow development to come forwards on safeguarded sites should the Council fail to meet its housing needs, and specifically the housing needs of LSCs.

Question 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?

3.5 In principle, PH Property supports the allocation of its site as a safeguarded site under reference PRE 3, however PH Property's primary position is that this site should be uplifted to a housing allocation with the remainder of the site safeguarded (please see paragraphs 2.34- 2.40 above).

3.6 The methodology for site selection of the safeguarded sites shows the wider site (under site reference FDR2001 in the Settlement Report) is suitable for allocation summarising the following at paragraph 4.119 (ED 40)

"Overall, the site performs well in a number of areas through the site selection process and it is considered that the majority of issues identified could be successfully mitigated. It is in an accessible location, achievable and although in the Green Belt, it makes a 'contribution' to the defined purposes of Green Belt (rather than a 'significant contribution' or a 'major contribution'). The main area of concern is the potential landscape impact. It is worth noting that (with the exceptions of sites CFS391 plot 1 and CFS574 already considered), all potential sites in Prestbury (including those making significant or major contributions to Green Belt) are within a local landscape designation area."

3.7 The reduced scale of the safeguarded allocation is justified by CEC on the basis of meeting a numerical requirement for 0.92 ha of safeguarded land rather than any other planning consideration related to the site, with the above conclusion from the Settlement Report demonstrating the suitability of the wider FDR2001 site for release from the Green Belt.

Question 17. How have the cumulative impacts of the future development of the sites proposed for designation as Safeguarded Land been considered, such as on the highway network, nature conservation assets and the green infrastructure network? What evidence is available to demonstrate this?

- 3.8 With regard to Prestbury, the Settlement Report details the responses from statutory consultees who were consulted on the range of selected sites and no significant barriers to development were identified.
- 3.9 With regard to site PRE 3, detailed representations have been submitted considering highways, nature conservation and green infrastructure, heritage and other key deliverability considerations. These are summarised in the previously submitted Development Statement (Comment Reference PBD1594). This work has demonstrated a site larger than allocated is deliverable, as has been assessed by the Council under site reference FDR2001. The only justification for a subdivided site allocation is to remain within the 200ha safeguarded land requirement identified in the preparation of the LPS and referred to in the supporting text of LPS Policy PG 4 (addressed further below).

Question 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?

- 3.10 Yes, exceptional circumstances have been evidenced and justified for removing the Safeguarded Land sites from the Green Belt and these are articulated in Document ED 53 and expanded on further in CEC/01.
- 3.11 Allocating only part of Site PRE 3 has been justified by CEC based on a need to allocate only 0.92 ha of safeguarded land after determining the proposed allocation of PRE 2 (Settlement Report Site Ref. CFS574) for 1.86 ha. CEC has therefore subdivided the larger site to fit the numerical requirement.
- 3.12 We strongly support the removal of PRE 3 from the Green Belt. PH Property would also support the removal of the whole of the site FDR2001 from the Green Belt which also has clear, recognisable boundaries by strong physical features comprising the railway to the west and existing hedgerows and vegetation to the south. The north and east abut the settlement boundary. This approach would increase the amount of Safeguarded Land which would help meet the requirement of 24 ha of safeguarded land in the LSCs as was originally intended at the LPS stage.

- 3.13 Local Service Centres Safeguarded Land Distribution Report (Document ED 53) explains that the overall requirement of 24 ha has been reduced to 13.6 ha as a result of an overprovision of safeguarded land at the LPS stage from 176 ha to 186.4 ha. This was a result of identifying sites along clearly defined boundaries as required by NPPF, rather than forming boundaries based solely on a numerical requirement.
- 3.14 As such, the requirement of 24 ha should still be applied to support sustainable development in the LSCs, and also the same flexible approach to meeting the requirement should be applied, which following clear boundaries based on an indicative numerical requirement.

4. SETTLEMENT BOUNDARIES (POLICY PG 9)

- 4.1 This chapter presents PH Property's representations in connection with the MIQ's relevant for Settlement Boundaries (Policy PG 9).
- 4.2

Question 26. 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?

- 4.3 No. In the North Cheshire Green Belt Settlements such as Prestbury, no allocations are proposed and safeguarded land allocations remain outside of the settlement boundary. Given there are no alternative sites to deliver housing within the urban area, this approach is not consistent with the LPS which at paragraph 8.34 (Document BD 01) states (with Asteer Planning's emphasis in **bold**):

*"In Local Service Centres and other settlements and rural areas, the Local Plan Strategy approach is to support an appropriate level of small scale development that reflects the function and character of individual villages. Small scale growth may be appropriate where it supports the creation of stronger local communities and where a clear need exists, which is not more appropriately met in a larger nearby settlement. 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.** In the case of Goostrey which adjoins Holmes Chapel, a larger Local Service Centre, it is anticipated that development needs will largely be provided for in Holmes Chapel".*

- 4.4 The settlement boundaries to Prestbury proposed in the SADPD directly conflict with the LPS approach to support small scale development to the LSCs and with neither the allocation of suitable sites or designation of settlement boundaries to support small scale development, the SADPD is clearly inconsistent with the LPS.

Question 27. With particular reference to the Settlement and Infill Boundaries Review and the individual Settlement Reports:

- a) **Is the methodology for the review and definition of detailed Settlement Boundaries robust?**
- b) **Have the criteria and judgements used to inform the choice of Settlement Boundaries been consistently applied?**
- c) **Are the proposed Settlement boundaries justified on the basis of proportionate evidence?**

4.5 The approach to reviewing the settlement boundaries of settlements inset in the Green Belt as identified in the Settlement Boundaries and Infill Review (ED 06) is to apply Stage 1 only – a review of boundaries in light of site allocations (see paragraph 4.6 of ED 06). However with no allocations now proposed for the LSCs, this methodology is not justified. It fails to take into account the LPS which identified allocations or settlement boundary revisions to accommodate small scale growth to the LSCs (paragraph 8.34 of BD 01).

4.6 In the absence of any site allocations, the methodology to settlement boundary reviews to settlements in the Green Belt should be revised to enable some small-scale development to meet local needs.

Question 28: 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?

4.7 No. CEC's own evidence base states that there is no urban capacity for new dwellings within the urban area of Prestbury. A number of commitments in their evidence of windfalls are for garden land development, and non are major development, indicating the limited availability of development sites to deliver new housing.

4.8 Prestbury is shrink wrapped by the Green Belt and no housing allocations are proposed. The settlement boundary does not allow for any future residential development during this plan period and will contribute to unsustainable spatial growth and exacerbate issues of affordability, a decline in the working age population and garden grabbing.

Question 29: Is there any substantive evidence to demonstrate that any of the proposed Settlement Boundaries are not justified in defining the boundary between the built-up area of the settlements and the open countryside?

4.9 Our response to the above questions (26, 27 and 28) detail why the settlement boundaries are not justified.