



# Prestbury Parish Council

Ms. Carole Crookes,  
Programme Manager,  
Cheshire East Local Plan SADP,  
PO Box 789,  
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Friday, September 24<sup>th</sup>, 2021

Dear Ms. Crookes,

**EXAMINATION INTO PART 2 OF THE CHESHIRE EAST LOCAL PLAN,  
THE SITE ALLOCATIONS & DEVELOPMENT POLICIES DOCUMENT DATED SEPTEMBER 2020**

**Answering questions of the inspector on Matter 2: Planning for Growth, Development at  
Local Service Centres and Safeguarded Land**

In respect of the first part of the examination in public into Cheshire East Council's SADPD, we have pleasure in submitting here the position statement on behalf of Prestbury Parish Council on the sub sections of Matter 2, Planning for Growth, which deal with development and safeguarded land at Local Service Centres in so far as the questions affect Prestbury. This is our response to the inspector's questions on these issues.

Yours sincerely.

**COUNCILLOR LILLIAN BURNS**

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Peter J Yates BA (Hons) M Phil MRTPI responding on behalf of Prestbury Parish Council to The Inspector's Questions 11, 12, 13, 15, 16, 17 & 18 in the MIQ in relation to Matter 2 Development at Local Service Centres (Policy PG8).

Answers to Q11

a) No, there is no need for disaggregation to individual LSCs.

b) No, there is no need for disaggregation to neighbourhood areas.

c) Yes, the plan has been positively prepared and is fully justified in relying on existing commitments & windfall development.

**Questions 11a) b) & c)** There are several reasons why there should not be disaggregation of housing and employment land to individual LSCs or to neighbourhood areas at this point in the Local Plan period 2010-2030.

1) There is no policy reference to the need to disaggregate the overall housing figure of 3,500 to individual LSCs in the adopted LPS (July 2017).

2) **Policy PG7 3.** states that:

*The Local Service Centres are expected to accommodate in the order of seven ha of employment land and 3,500 homes.*

However, **para 8.77** advises:

*The figure for LSCs will be further disaggregated in the SADPD &/or in Neighbourhood Plans.*

This statement was based on the housing supply situation as at **31/3/2016 (Table A3 Housing Distribution: LSCs. CELPS 2017).**

Housing completions:	568	
Housing Commitments:	2,056	
<b>Housing Supply:</b>	<b>2,624</b>	<b>Outstanding houses to be provided: 876.</b>

At the time of the LPS adoption, it was considered that in order to meet housing requirements in the 13 LSCs, small scale allocations would have to be considered in them.

**However, the LPS seriously underestimated the number of houses that would come forward as windfalls, not just in the LSCs but everywhere.**

In LSCs the **Housing Supply** situation at **31/3/21 (CEC's Housing Monitoring Report)** showed:

Housing completions:	2,265	
Housing commitments:	918	
<b>Housing Supply:</b>	<b>3,193</b>	<b>Outstanding houses to be provided: 307.</b>

**To date, all of the housing which has been delivered since 2010 in the six LSCs inset in the North Cheshire Green Belt has taken place on non-allocated sites. It is reasonable, therefore, to expect the remaining 307 to be windfalls.**

**As at 31/3/21, 92% of the housing requirement figure of 3,500 houses in the LPS has already been met by housing completions and commitments. This percentage is regarded by CEC as being “in the order of” the 3,500 dwellings, which is the wording in Policy PG7 3.**

- 4) Over the five years 2016-2021, 569 houses have been delivered in the 13 LSCs on windfall sites.** This is despite restrictive policies in Goostrey, relating to its proximity to the radio telescope at Jodrell Bank and in Mobberley relating to aircraft noise associated with Manchester Airport.

This level of provision amounts to **114 houses pa**. What is required to meet the total of 3,500 houses by 2030, is a level of provision annually of **34 houses**. This is spread over the 11 LSCs, excluding Goostrey and Mobberley. **In practice each of the remaining 11 LSCs will need to provide only 3 on houses pa.**

**The Annual Monitoring Report (AMR) (2019-20) page 28** states in relation to windfalls:

***“It is reasonable to assume that this supply will continue to come forward over the remaining years of the plan period”.***

- 5)** This approach of enabling a modest amount of organic growth within the LSCs within existing settlement/Green Belt boundaries is both acceptable and sustainable. It also avoids the negative and artificial capping of development once a total for the settlement has been reached, a practice which runs counter to nation planning policy.
- 6) A great number of the LSCs are not free-standing villages,** but have significant functional links with adjacent large towns. This is particularly the case with regard to Macclesfield and Crewe. Many parishes and settlements adjacent to Macclesfield have taken and are to take large scale housing and other development which will satisfy Macclesfield’s and the adjoining LSCs’ and parishes’ needs. Prestbury has accommodated a major development of 30 ha in the Green Belt for King’s School, which has relocated from Macclesfield.

**It is therefore artificial to view every village in isolation from the other higher order settlements nearby.**

## Answers to Q12

### Yes, policies are sufficiently flexible.

- 1) In the light of the above comprehensive evidence, it is abundantly clear that the **SADPD has been 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 PG7**.
- 2) In terms of addressing the issue of further windfall development in the LSCs the following points are made:

**Provision is only needed for 34 houses annually in the 11 LSCs**, excluding Goostrey and Mobberley, when 114 houses have been provided for each of the five years from 2016-21.

The 13 LSCs have a total population of 50,227 (2019 est.), and over 20,000 houses; **307 houses represent a 1.5 % increase over the 2019 figure**.

**There is considerable scope in the built up area of the largest LSCs for windfall schemes to come forward.**

**Policy HOU 12** is specifically aimed at increasing housing densities, which will be a realistic proposition in these centres.

On account of the small numbers of houses involved it should not be necessary to identify potential windfall sites which, by their very nature, are not necessarily identifiable.

## Answers to Q13

### No, there is no case for further site allocations in the LSCs.

- 1) The above comprehensive evidence is compelling in justifying the lack of need for further site allocations in the LSCs. Without any site allocations it is highly likely that the 3,500 housing figure will be well exceeded. The other policies in the LPS and SADPD encourage the use of brownfield site, redevelopment of existing housing sites and higher densities. In addition, the increased number of empty shops, vacant community buildings, available commercial premises and empty offices will provide a major source of new housing in the built up areas of the LSCs.
- 2) Most of this **brownfield development will be at higher densities** than on green field sites, and produce more **affordable housing** in a **sustainable location**.
- 3) The need for affordable housing will vary between LSCs. Of the **six LSCs** within the **North Cheshire Green Belt** referred to in **ED53 LSCs and Safeguarded Land Distribution**, Prestbury does not show a high rate of housing need and its housing register is low in comparison to population

share (**para 3.11**). Affordable housing has recently been provided in Prestbury, and there is no pent-up need demand for affordable housing (**para 3.13**).

- 4) This is, in part, due to the availability of several hundred **affordable houses** at **Upton Priory** in Macclesfield, which physically adjoins Prestbury parish.

There are many ways in which the small number of houses still required can be met. There are also several options in terms of addressing the need for affordable housing, although the need in Prestbury is low compared to other LSCs in the North Cheshire Green Belt. In any case, allocating sites in the Green Belt in Prestbury will do little to provide affordable housing, as the number of houses on the sites abut low density housing areas.

### **Answers to Q15**

#### **It is not justified by the lack of up-to- date evidence provided by CEC.**

The question raises three matters which need to be met to satisfy the need for additional safeguarded land:

- 1) The expectations of the LPS.
- 2) The potential for development requirements post 2030 to change under the standard method for calculating local housing need, and
- 3) The requirement in **para 140** of the NPPF of the existence of exceptional circumstances to justify altering the Green Belt boundaries.

1) **Policy PG4 (6)** of the **LPS (July 2017)** clearly states that:

*In addition to these areas of safeguarded land listed; **it may also be necessary** to identify additional non-strategic areas of land to be safeguarded in the Site Allocations Development Policies Document.*

This wording followed on from the inspector into the LPS stating in his report that he expected an up-to-date assessment of whether exceptional circumstances existed regarding the release of further safeguarded land from the Green Belt as part of the preparation of the SADPD.

The requirement of up-to-date and relevant evidence was referenced in **para 158** of the **NPPF (2012)**, the appropriate national guidance when the LPS was prepared.

**Between 2017 and 2021**, a considerable number of **significant changes** have taken place in Cheshire East. These should have been considered as part of an up-to-date and relevant assessment of whether exceptional circumstances existed to release further safeguarded land from Green Belt in the six LSCs in the North Cheshire Green Belt.

The significant changes include the following:

## **Housing.**

The LPS anticipates **1,800 houses pa** being built in order to provide **36,000 houses** in the period 2010-30.

CEC's **Housing Monitoring Statement (31/3/21)** identified current completions and commitments to be **42,002 houses**, with **nine years** of the Plan period remaining.

Over the past three years (**2018-21**) completions have been in the order of **3,000 houses pa**.

The **annual Local Housing Need Figure** was calculated at **1,068 houses** by the **MHCLG (Dec 2020)**.

Even though it is accepted that this is a dynamic figure, it needs to be recognised that an increase of 50% would still result in a figure well below the number of houses being delivered.

Local Housing Need figures have been increased for Greater Manchester, and to provide further safeguarded land would be to potentially undermine the delivery of housing to meet these needs. This is relevant in relation to Prestbury which has a border with Stockport MBC.

## **Employment Land take up.**

In the **first 10 years** of the LPS, as indicated in the **AMR (2019-20)**, the **take up** of employment land allocations has been only **44.90 ha out of a total allocation of 453.45 ha**.

It is unlikely there will be a high take up in the second 10 years (2020-30), as a much higher percentages of employees are working from home following the Covid pandemic. The Chartered Institute of Personnel Development (CIPD) report of July 2021 concluded that across the country some 37% of employed people would work from home on a regular basis in the future. In areas like North Cheshire that figure could be of the order of 50%.

The implications of this will make it likely that **no more than 20% of the 453.45 ha will be used for employment purposes**, and the balance will be available for other uses, particularly housing. This has already taken place at East Tytherington Business Park adjacent to Prestbury parish.

In housing terms over 300 ha of available employment land could produce over 9,000 houses.

## **Town Centre changes.**

The percentage of **vacant retail units in town centres** in Cheshire East averages out at **10.9% (AMR 2019-20)**.

Vacant office blocks and high density housing schemes have started to characterise Macclesfield town centre.

As with **all brownfield sites in urban areas, such redevelopment schemes are of a higher density than green field peripheral sites, and far more sustainable**.

On account of these significant changes, the capacity of the urban areas of Macclesfield, and the KSCs in the North Cheshire Green Belt, needs to be reassessed and projected forward beyond 2030. The scope for large numbers of houses into the future will undoubtedly far exceed the number of houses which could be accommodated on the 13.6 ha of safeguarded land allocated in the SADPD for the five LSCs in the North Cheshire Green Belt.

This very brief summary of the changed circumstance since the adoption of the LPS, have not been considered in relation to assessing the need for further safeguarded land, using up-to-date and relevant evidence. This is not in accordance with para 31 of the NPPF (2021) which states that:

*The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.....and take account of market signals.*

**As the SADPD has not followed the national guidance or the requirement in Policy PG4 (6) of the LPS, the question remains on what basis has the requirement for further safeguarded land been followed?**

Several supporting documents on many occasions have stated that the relevant document, which addresses exceptional circumstances and justifies the need for further safeguarded land is:

**Local Service Centres Safeguarded Land Distribution Report (ED53).**

**Document ED05** is one such document which refers to **ED53** as being the one which sets out the consideration of exceptional circumstances. Planning Officers have made similar statements at Council meetings.

The **title** of the document **ED53** states that it is concerned with the distribution of further safeguarded land rather than whether '**it may also be necessary**' to identify further safeguarded land, having considered whether up-to-date and relevant evidence provided the exceptional circumstances to release further land from the Green Belt.

Instead, the expectations of the LPS, as clearly stated in **Policies PG3 & PG4**, have been set aside and CEC has considered that exceptional circumstances have already been justified for **200 hectares** to be taken from the Green Belt in North Cheshire for safeguarded land, and the role of the SADPD is to decide where the residual 13.6 ha should be accommodated.

**This approach does not follow the expectations of the LPS, the potential for development post 2030 under the standard method for calculating local housing need, and the requirements of paragraph 140 of the NPPF (2021).**

#### Answers to Q16

**The selection and distribution process for the designation was deeply flawed for several reasons, and as such was not based on a robust methodology and justified by proportionate evidence.**

**The response to Q15** makes it abundantly clear that there is **no need for further safeguarded land in the LSCs.**

The fact that safeguarded land sites are the focus of this question, means that the starting point for the response must be the Green Belt status of the sites, and the need to fully evidence and justify the exceptional circumstances to warrant the land occupied by the sites being removed from the Green Belt.

There have been **two Green Belt Assessment Reports**, one in **2013**, and one in **2015**. Of the eight safeguarded sites selected for removal from the Green Belt, six are still classified as making a “significant contribution” to the five Green Belt purposes.

Site PRE 3 off Heybridge Lane in Prestbury was originally classified as making a ‘significant contribution’ and subsequently downgraded without explanation.

PRE2, land to the south of Prestbury Lane, was originally part of a bigger land parcel which made a ‘major contribution’ to the Green Belt in 2013, yet two years later it was regarded as only making a ‘contribution’, again without an explanation.

Prestbury Parish Council criticised a number of aspects of how sites were judged in their submissions on the publication versions of the SADPD.

We have major issues with the traffic light system used, which we contend was flawed and highly subjective. Every criteria was given the same weighting and key information was missing. Yet irrelevant criteria was introduced.

Criteria 14 of the RAG assessment deals with the key issue of accessibility. There is specific guidance in the LPS under Policy SD2 in Table 9.1 and paragraph 9.5, with regard to the access to services and amenities. There is however no reference to this key table under the important criteria of accessibility.

Using the correct Table 9.1 in the LPS results in only four of the 20 criteria for accessibility being met, and a ‘Red’ rating, as opposed to the ‘Green’ rating, which is not based on any recognised system of assessing accessibility.

**In the light of the above serious deficiencies in the RAG assessment it is considered that it is not a robust means of selecting safeguarded sites, and it is not consistent with national policy guidance and the LPS.**

### **Answers to Q17**

**There is no evidence that the cumulative impacts of the sites proposed for designation as safeguarded land in the LSCs have been considered in any documentation.**

The same is the case with regard to the large-scale amount of land, 186.4 ha, released for safeguarded sand in the LPS.

The site selection methodology deals with impact on the highway network in a superficial way. As far as sites PRE 2 and PRE 3 are concerned, no reference is made to the need for



major highway improvement works at the junctions of Prestbury Lane with the A523 and Heybridge Lane (the A538), nor of the need to acquire land not in public ownership to undertake expensive mitigation works.

Nature Conservation surveys have been left for the future, despite the evidence of protected species on the site. No reference is made to the winter flooding, nor to the lack of any site drainage or the adjoining low density areas.

In order to ensure consistency with national policy the SADPD should be seeking to secure compensatory improvements to the environmental quality and the accessibility of remaining Green Belt land close to each of the safeguarded sites. Whilst **Policy PG12 4.** refers to this being a requirement of any future application, there is no evidence to illustrate how this requirement could be achieved.

### **Answers to Q18**

#### **No is the response to whether exceptional circumstances have been fully evidenced and justified for removing the eight sites from the Green Belt.**

**There is a distinct lack of evidence to show that any attempt has been made.**

**The responses to Questions 15, 16 & 17 clearly show the considerable deficiencies in the whole approach to safeguarded land, and the seriously flawed site selection process. The setting aside of the relevant policies in the LPS, and taking the view that exceptional circumstances had already been established in the preparation of the LPS for 200ha of safeguarded land to be taken out of the Green Belt, is the opposite of the fully evidenced and justified approach required by para 140 of the NPPF (2021) and Policy PG4 (6) of the LPS.**

By taking the approach which is pursued in the SADPD, CEC has also relied on evidence used in preparing the LPS, which dates back to 2015. No attempt has been made to consider the information available regarding the significant changes which have taken place since the adoption of the LPS in 2017.

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