

**PETER J YATES BA (Hons) M Phil MRTPI responding on behalf of Mrs J Thompson, Mrs S. Moss, and Mr Philip Thompson to the Inspector's questions 38, 39 & 40 in the MIQ in relation to Matter 2 Strategic Green Gap Boundaries (Policy PG13).**

### **Introduction.**

I have been engaged by Mrs J Thompson, Mrs S Moss and Mr Philip Thompson to represent them at the Public Hearings into the Site Allocations and Development Policies Document. Representations have been submitted on Part 1 of the Local Plan and both the Publication (2019) and Revised Publication (2020) stages of the SDAPD.

The representations all relate to a piece of land on the east side of Crewe Road and to the immediate north of the A500. To the immediate east of the land lies a large new mixed development, known as Basford West.

I am responding specifically on the need to change the boundary of the Strategic Green Gap to follow the A500 which it does to the immediate east of the land, along the southern boundary of the West Basford development. It is proposed that the Strategic Green Gap boundary continues to follow the A500 up to Crewe Road.

**Question 38. Is the methodology for the definition of detailed boundaries for the Strategic Green Gaps (SGGs), as set out in the SGG Boundary Definition Review (SGGBDR) soundly based?**

**It is considered that the definition of the detailed boundary of the Strategic Green Gap, in relation to the site on the east side of Crewe Road and to the immediate north of the A500, as set out in the SGGBDR is not soundly based.**

**The SGGBDR (August 2020) ED08 sets out its review methodology on the basis of:**

- (1) The SGG boundary in the Crewe and Nantwich Borough Local Plan Proposals Map.
- (2) Areas of development which had taken place since the adoption of the CNLP eg Basford West.
- (3) The Settlement Boundary for Crewe ED28.
- (4) Sites removed from the GG boundary as defined in Saved Policy NE4.

This resulted in the **Strategic Green Gaps boundaries shown as Figure 8.3 in the LPS.**

The result of this exercise resulted in a Strategic Green Gaps boundary largely following the proposed Settlement Boundaries. The Settlement Boundaries were drawn up on the basis of containing the future development of the settlements, which were not the basis for the definition of the boundaries of the Strategic Green Gaps according to para 3.9 of the **SGGBDR (August 2020).**

**Para 3.9 states that:**

***The proposed boundaries have been defined along logical, identifiable physical features on the ground, that are likely to be permanent.***

The most substantial of these are railway lines, roads, and canals and rivers.

Of these the **A500** is used as the boundary to the south of Basford West and East over a distance of **2.5 kms**.

**Policy PG5** of the **LPS** provides further guidance in relation to the Strategic Green Gaps.

- (1) SGGs lie between settlements & these are shown on Figure 8.3.
- (2) The detailed boundaries will be defined in the SADPD and shown on the Adopted Policies Map.
- (3) The purposes of SGGs are threefold:
  - (i) To provide long-term protection against coalescence.
  - (ii) To protect the setting & separate identity of settlements; and
  - (iii) To retain existing settlement pattern by maintain the openness of land.

In terms of the Crewe Road site at no stage has the Council provided any detailed evidence to illustrate why this site should remain in the Strategic Green Gap between Crewe and Shavington. Both the SGGBDRs (2019/PUB08 Appendix 3 & 2020/ED08 Appendix 4) provide a list of sites, recommended by those making representations on the SADPDs (2019 & 2020) to be deleted from the SGG, but with no detailed appraisal of the sites. There is no attempt to consider the sites in relation to the guidance in para 3.9 of the SGGBDR regarding the need to use logical and identifiable boundaries, or whether the sites satisfied the purposes of the SGGs set out in Policy PG5 3.

**Without appraising the sites in relation to the specific guidance in the LPS and the SGGBDR, the process used cannot be considered to be soundly based.**

**Question 39. With particular reference to the SGGBDR have the principles and criteria used to inform the definition of detailed SGG boundaries been consistently applied and are the resulting detailed boundaries justified, based on proportionate evidence?**

**In response to Question 38 and the SGGBDRs it is clear that the principles and criteria used to define the detailed boundary in relation to the Crewe Road have not been followed.**

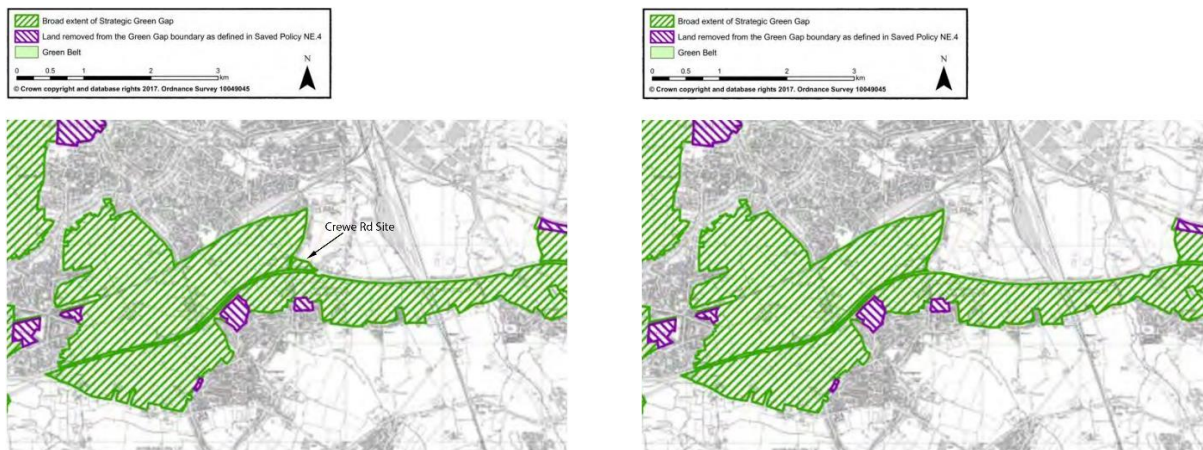
In relation to the other long list of sites recommended for exclusion from the SGG by representatives on the SADPDs (2019 & 2020), all of which have no detailed appraisal, it is evident that the principles & criteria have not been applied, although the Council has been consistent in not applying them. This is contrary to the approach envisaged in the Inspector's Report on the Examination into the LPS that:

The detailed boundaries will be subsequently addressed through the SADPD.

**Question 40 Is there any substantive evidence to demonstrate that any of the proposed detailed boundaries to the SGGs are not justified?**

In terms of the **Crewe Road site**, it is considered that if the principles and criteria used in defining the SGG boundary had been consistently applied, it would have been excluded from the Strategic Green Gap.

The Strategic Green Gap Boundary should be realigned to follow the A500 from the west of the Basford West Site (LPS3) as far as the Crewe Road, and then follow Crewe Road northwards to where the proposed detailed boundary in Figure 8.3 in the LPS joins the Crewe Road.



**Boundary in the Local Plan Strategy**

**Proposed realigned boundary**

The boundaries in Figure 8.3, and the proposed realigned boundary are shown on the above maps.

The reasons why the realigned boundary meets the principles and criteria within Policy PG5 3 and the SGG BDR are:

- (1) The realigned boundary is logical, and based on clearly identifiable and physical features on the ground, as it follows the SGG boundary of the A500 to the east. A consistent approach to boundary definition, as well as the specific details of the realigned boundary, fully comply with para 3.9 of the SGG BDR (August 2020) ED 08.
- (2) The proposed boundary follows the most permanent of the listable physical features on the ground as listed in para 3.9 ie the A500 and Crewe Road. There is an exception to that is the north-south railway line.
- (3) It is fully consistent with the approach taken by the Council in relation to the boundary definition of the SGG for both Basford West (LPS3) and Basford East

(LPS2), the former of which joins the Crewe Road site. Both these sites use the A500 as the boundary of the Strategic Green Gap.

- (4) The inclusion of the Crewe Road site in the SGG is not logical, and its exclusion from the Strategic Green Gap would not compromise the long-term protection of the area against coalescence, as the extensive area of open land to the south of the A500 will maintain the setting and separate identity of both Crewe and Shavington.
- (5) As well as having strong and permanent and clearly identifiable boundaries, the site has development on 3 sides, which does not compromise any of the 3 purposes of the Strategic Green Gap.

**In response to Question 40 it is considered that the above substantive evidence demonstrates that the detailed boundaries of the SGG in the vicinity of the Crewe Road site are not justified, and that the boundary should be realigned to comply with the principles and criteria established in Policy PG5 3 and the SGG BDR.**

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