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PUBLIC

SENT VIA EMAIL: Carol.Crookes@cheshireeast.gov.uk

Dear Ms. Crookes,

**Hearing Position Statement for Matter 2 (Planning for Growth – Infill Villages and Village Boundaries) concerning the Examination into the Soundness and Legal Compliance of the Cheshire East SADPD**

We write on behalf of our client as the representor, Mr. Robert Twemlow, regarding the examination into the soundness and legal compliance of the Cheshire East SADPD.

The ability to provide representations during the examination into this emerging plan is welcomed by our client and it is hoped that feedback provided during this process will inform the composition of a robust plan to guide growth and development into the future.

The following statement outlines the response our client wishes to make known after having reviewed the evidence base contained within the SADPD Examination pages that can be viewed on the Cheshire East Council website.

We hope that by engaging with the examination process at this stage we can assist in the development of a concise and well-rounded planning document to sustainably meet the present and future needs of the community.

**Hearing Position Statement**

Our client's site is situated in the southern area of Winterley, surrounded by existing and committed residential development on three sides and bound by Crewe Road to the south, making it well related to the built up area of the village. It is sustainably located near to existing community infrastructure and good road access, evidenced by the relatively newly developed Winterley Gardens situated to the west of the site. An aerial image showing the extent of the site is depicted outlined in red below:



The questions below have been extracted from the Matters, Issues and Questions for the Examination (MIQs). The questions our client has chosen to provide answers for are of great relevance to their interests and the site they are seeking to be included within the Infill Boundary for Winterley.

**Question 32:** Given that the housing and employment land supply from completions and existing commitments within the OSRA already exceeds the indicative levels of development identified for this settlement tier in Policy PG7 of the LPS, is there a need for these indicative levels of development to be disaggregated to individual settlements or for any further sites to be allocated within the OSRA to ensure the SADPD is consistent with the LPS and national policy?

The Local Plan Strategy was adopted by the council in July 2017, with the evidence forming the basis of the document being older than this date. This document can no longer be regarded as being recently adopted, and the housing and employment figures contained within it should be reassessed in a partial review of the document. Therefore, the housing requirement identified in the document is no longer as accurate to reflect the housing requirements within the settlement tiers of the settlement hierarchy.

By stating that a blanket allocation of 2,950 new dwellings was to be given to this settlement tier, it was not possible from the Local Plan Strategy document to identify where there were pressures for new housing to be delivered. Therefore, in order to direct development to the locations that require it the most, it is suggested that the Other Settlements and Rural Areas tier of the hierarchy is amended to quantify the individual requirements for each settlement. This would also ensure development is being directed to the settlements within this tier that are more sustainable than others.

The services, amenities and community infrastructure provision within Winterley all contribute to it being regarded as one of the more sustainable infill villages identified in Policy PG 10 of the SADPD, therefore, greater flexibility should be afforded to the settlement to provide future housing

delivery where it could not be accommodated elsewhere in the OSRA settlement tier. It is not believed that the current blanket designation within this settlement tier adequately makes reference to directing development to the most sustainable locations, as required in national policy.

**Question 35: With reference to the SIBR, is the methodology used to define Village Infill Boundaries robust? Have the criteria and judgements used to inform the choice of Village Infill Boundaries been consistently applied? Are the Boundaries justified on the basis of proportionate evidence?**

In Paragraph 4.36 of the SIBR, it is stated that the approach to defining Infill Boundaries should follow the approach taken for Settlement Boundaries which is set out in Part A of Section 4. Table 5 and 6 within Section 4 outline a thorough process for assessing whether or not land should be included within Settlement Boundaries, however, it is not believed that the same thorough approach has been applied when assessing which portions of land should be included within Infill Boundaries.

Paragraph 4.37 of the SIBR states that the same considerations given to Settlement Boundaries should apply when proposing land to be included within Infill Boundaries, namely their allocation status, relationship with the built form of the settlement, and relationship with physical features.

It is not believed that the criteria and judgements used to inform Infill Boundaries has been consistently applied as the accurate application of this methodology would have resulted in our client's land in Winterley being included within the proposed boundary.

Table 5 of Section 4 details the criteria for assessing whether a site is in a functional relationship to the physical form of a built up area. In order for a site to be included within the boundary, the site must adjoin the existing boundary, and also must display high levels of containment. Our client's site shares 76% of its border with that of the existing boundary of Winterley and the protected open space of the village, which is a clear indication that it is a very well contained site, therefore meeting the criteria of Table 5 in order for it to be included within the proposed boundary.

Table 6 of Section 4 details the criteria for assessing whether the settlement boundary relates to a readily recognisable, permanent, physical feature, such as roads, railways, water bodies etc. If a section of the settlement boundary is not deemed to be well related to a distinguishable feature then the outcome given by the table is that it should be revised.

As can be understood from the proposed Infill Boundary for Winterley, there has been a missed opportunity to use Crewe Road as a robust boundary for the village to define the extent of the settlement. The current route of the boundary fails to include the managed recreation space of Frank Keating Close, which features permanent recreation equipment and has a functional relationship to the associated housing development. As the principle gateway into Winterley from the south, Crewe Road should be recognised as the readily recognisable, permanent, physical feature to define this area of the village.

**Question 36: Is there any substantive evidence to demonstrate that any of the proposed Village Infill Boundaries are not justified?**

The Village Infill Boundary for Winterley within the Draft Policies Map currently omits the land concerning the allowed appeal (ref: APP/R0660/W/20/3251104) for up to 55 dwellings east of Crewe Road and north of Pool Lane. This land borders the proposed infill boundary on three of its four sides, with residential development along its western and southern border. As it stands, the



land currently exists as an effective exclave of the undeveloped open countryside which is almost entirely surrounded by the proposed infill boundary for the village. The appeal concerning this land was allowed yet the current boundary would see it classed as being outside of Winterley.

On a similar note, the majority of our client's land is bordered by residential development and associated protected open space of the village, which equates to approximately 76% of the length of the land's boundary. The remaining 24% borders the physical boundary of Crewe Road. As can be understood from reviewing the Draft Policies Map, this land is in a similar position to the land of the appeal (ref: APP/R0660/W/20/3251104) in which it exists as a pocket of the open countryside surrounded on the majority of its sides by the village of Winterley. Also, at 0.648 hectares in size, the site does not form an important function of the open countryside, therefore, it is much more well related to being included within the boundary for Winterley.

**Question 37: Have the Village Infill Boundaries defined on the Draft Policies Map been positively prepared and will they be effective in enabling further windfall sites to come forward to support sustainable development in the OSRA?**

As it stands, the proposed Infill Boundary for Winterley has been demarcated too tightly around the settlement so that it only includes the existing built up areas of the village, and not areas that are very well related to the built form. Therefore, there is little scope for proposing further windfall sites within the proposed boundary to support sustainable development. Rather than focusing on what already exists within the settlement, the proposed Infill Boundary should reflect the guidance within Section 4 of the Settlement and Infill Boundaries Review document which advises that proposed boundaries should take cues from aspects such as whether a site is in a functional relationship to the physical form of the built up area, or whether the settlement boundary relates to a readily recognisable, permanent, physical feature. Therefore, as it stands it cannot be said that the Infill Boundary for Winterley has been positively planned and it currently goes against the boundary review methodology developed by the council.

## **Summary**

The Site Allocations and Development Policies Document needs to provide more flexibility in Winterley, more in line with the recommendations outlined within this statement. The demarcation of an Infill Boundary needs to be conducted according to the methodology developed by Cheshire East Council.

The Other Settlements and Rural Areas tier of the settlement hierarchy should contain specific housing and employment land requirements for individual settlements to identify where development should be directed.

The compatibility of our client's site to the criteria of reviewing settlement boundaries has been demonstrated and suggestions have been made to where in Winterley changes to the proposed Infill Boundary can be made to ensure it will be effective in enabling further windfall sites to come forward to support sustainable development.

On behalf of our client, we would like to thank you for being able to provide a hearing position statement in relation to the examination into the SADPD. Should you have any questions or comments then please do not hesitate to get in touch using the channels provided.



Yours sincerely

A handwritten signature in black ink, appearing to read 'Doug Hann'. The signature is stylized and cursive.

Doug Hann  
Director