

PETER J YATES BA (Hons) M Phil MRTPI responding to the Inspector's questions 64 & 65 in the MIQs in relation to Matter 3 Housing Density (HOU12).

Introduction.

I submitted several representations and attended all the Examination Hearings in to the LPS. I have also submitted representations on several matters in both the Publication Draft SADPD (August 2019), and the Revised Publication Draft SADPD (October 2020). These include Housing Policies in Local Service Centres & Safeguarded Land, the Site Selection Methodology, Housing Density and Jodrell Bank. This Position Statement focusses on those aspects relating to Matter 3 Housing Density (HOU12).

Question 64. Is the minimum density of 30 dph for new residential development in Cheshire East specified in Policy HOU 12 justified on the basis of proportionate evidence? If so what is the evidence to support the minimum density?

The minimum density proposed is not justified by any evidence.

Policy HOU12 is in conflict with Policy SD1 Sustainable Development in Cheshire East, Policy SD2 Sustainable Development Principles, Policy SE1 Design, Policy SE2 Efficient Use of Land all of which are key policies in the LPS. Policy HOU12 is also in conflict with para 124 and Section 12 Achieving well-designed places in the NPPF 2021.

No evidence has been produced to show that the amount of housing land coming forward is such that all existing built-up areas should be treated the same by imposing a minimum density for all new residential areas in order to increase the amount of housing coming forward.

The evidence that exists shows that the numbers of houses coming forward on windfall sites is far in excess of that planned for in the LPS. This applies to towns and villages in the Settlement Hierarchy. In terms of the Local Service Centres and the Other settlements and Rural Areas all the 6,830 houses built and committed are on windfall sites. This has occurred with the long-established planning policies in the legacy Local Plans in place.

There has been no attempt to review the success of these policies and the impact on the richness and diversity of the towns and villages of Cheshire East, which are extolled in para 1.24 of the LPS.

Para 1.48 of the LPS unwittingly sets out the basis on which any attempt to introduce a policy on density should take place:

The towns & villages vary greatly in character and each face differing issues and needs for the future.

The message in the LPS is that “one size doesn’t fit all “.

In the Macclesfield Borough Local Plan (2004) Policy H12 for Low Density Areas in Prestbury, Alderley Edge, Knutsford, Wilmslow and Poynton provided detailed advice regarding the criteria for considering new development, and identified the boundaries of these areas on the Proposals Map.

These Low Density Housing Areas came about as a result of the type of pressure now proposed in Policy HOU12. The policy is backed up by detailed design advice in specific Supplementary Planning Documents, including Prestbury Village Design Statement (2008) and the Three Wilmslow Parks (2004). There is no reference in the SADPD to the future of the many existing SPDs, which have for a long time provided a sound basis for making planning decisions.

The Prestbury Village Design Statement (2008) which contains density tables for 25 areas of the village, has been used on a regular basis at planning appeals, and given substantial weight by planning inspectors, and should be carried forward. It would be appropriate to review the Statement in the light of the advice in the NPPF 2021.

Similar documents could be prepared for other Low Density Housing Areas, to supplement individual Neighbourhood Plans.

No attempt has been undertaken to appraise the success of the Low Density Housing Areas Policy H12, except as by the local groups who represent the towns and villages within which they are based. Many of them have made written representations on the 2019 & 2020 SADPD consultation documents. These include Prestbury Parish Council, Prestbury Amenity Society and many residents, the Edge Association in Alderley Edge, the Wilmslow Park Residents Group, the South Knutsford Residents Association and many others.

An independent assessment of the success of the Low Density Housing Areas is reflected in the success at appeal in defending Policy H12.

In the light of the long term success of Policy H12, and the overwhelming absence of any evidence to support Policy HOU12, it is strongly recommended that Policy HOU12 should be deleted from the SADPD.

Question 65. Should Policy HOU12 be more explicit in accepting densities below the minimum of 30 dph where lower densities are important to local character? Given the diverse character of residential areas in Cheshire East, would setting a range of acceptable densities for new residential development for different settlements be more effective and consistent with national policy?

Yes, the policy should be more explicit and fully evidenced and justified.

The overwhelming lack of evidence to justify Policy HOU12 points to a need to go back to basics and to undertake a comprehensive look at the objectives of Policy HOU12, and the

options available to address the issue of the density of new residential development. This would involve a great deal of work and time.

Evidence from other Local Plans might help. Some have used a **range of densities** to reflect the varied character of areas with a mix of towns and villages. For example, there is evidence to show that in terms of the low density end of the spectrum Policy H12 of the Macclesfield Borough Local Plan has worked well for over 20 years, and is specific to different towns and villages and the boundaries of the **Low Density Housing Areas have been identified on Proposals Maps for upward of 30 years**. At the other end of the range ie housing at 50 dph or higher could be focussed on Crewe and Macclesfield town centres. In between there could be a density for new housing estates ie Strategic Sites of 30-35 dph. Brownfield sites over a certain size could be 40 dph. These are only examples, and a great deal of work would need to be undertaken with Town & Parish Councils to identify appropriate densities for individual towns and villages in the top 3 rungs of the Settlement Hierarchy.

It has been noted that there has been **a change between the wording of HOU12** in the Publication Draft SADPD (August 2019) and the Revised Publication Draft SADPD (October 2020). When considering applications for increasing the density in residential areas:

Factor 3 (ii) The character of the surrounding area (recognising that there are some areas of the Borough with an established low density character that should be protected & their wider landscape and/or townscape setting).

These are very limited wording changes which will do nothing to protect the Low Density Housing Areas, as they are just one of 7 factors which have to be considered in appraising development proposals.

The wording is **vague**, and **superficial**, and **open to wide interpretation**. There is no reference to a **density figure**, or an attempt to **name these areas** or **identify them on the Adopted Policies Map**.

The wording will do nothing to protect Low Density Housing Areas and is **contrary to the national advice in para 16 of the NPPF (2021)** that Plans should:

(d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

An alternative approach with a range of densities would be more compatible with Policies SD1, SD2, SE1 & SE2 of the LPS, Policy GEN1 of the Revised Publication Draft SADPD (October 2020) and para 124 & Section 12 of the NPPF (2021).

The approach of Policy H12 with its Supplementary Planning Documents is fully compatible with the up-to-date national advice.

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