

EiP Statement

Cheshire East Site Allocations and Development Policies Document

Story Homes

Representor ID: 1255389

Our ref 42155/11/CM/MGR

Date September 2021

Subject Matter 7 – Transport and Infrastructure

1.0 Introduction

- 1.1 Lichfields is instructed by Story Homes [Story] to make representations on its behalf to the emerging Cheshire East Site Allocations and Development Policies Document [SADPD].
- 1.2 This Statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 7 Examination in Public [EiP] hearing session.
- 1.3 Separate representations have been submitted in respect of the following Matters:
- 1 Matter 1 – Legal Compliance and Duty to Co-operate
 - 2 Matter 2 – Planning for Growth
 - 3 Matter 3 – Housing
 - 4 Matter 6 – General Requirements
 - 5 Matter 8 - Natural Environment, Climate Change and Resources
- 1.4 These Matter Papers representations should be read in conjunction with previous submissions on the SADPD [Representor ID 1255389].
- 1.5 Story is seeking to bring forward a sustainable and high-quality residential site (including affordable homes) at Ryleys Farm, Alderley Edge. In the Publication Draft SADPD, part of this land was allocated for residential development (Site ALD2 – Ryleys Farm, north of Chelford Road) and part of the site was identified as Safeguarded Land (Site ALD3 – Ryleys Farm (Safeguarded)).
- 1.6 In the Revised Publication Draft SADPD, the proposed allocation has now been removed. The Safeguarded land at Ryleys Farm remains but the northern and southern boundaries have been amended and the site has been reduced in size (from 2.7ha to 2.32ha).
- 1.7 Story strongly objects to the removal of the allocation at Ryleys Farm in the Revised Publication Draft SADPD. The identification of the safeguarded land is supported but we consider that the boundaries of the Safeguarded land should be amended, to provide a more permanent defensible boundary and to accommodate the re-allocation of land at Ryleys Farm.

- 1.8 This statement expands upon Story’s previous representations made throughout the Local Plan preparation process in light of the Inspector’s specific issues and questions. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework [the Framework] and the National Planning Policy Practice Guidance [Practice Guidance].

2.0 Planning Issues

Highway safety and access (Policy INF 3)

Q110. Is criterion iii of Policy INF 3 consistent with national policy in its expectation that development traffic is ‘satisfactorily assimilated into the operation of the highway network’, given that the NPPF states that development should only be refused where the residual cumulative impacts on the road network would be ‘severe’?

- 2.1 Story considers that Policy INF3 (iii) which states that ‘development traffic should be satisfactorily assimilated into the operation of the highway network’ should be deleted as it is not effective and conflicts with the Framework [para 16 (d)]. The wording is ambiguous and it is not clear how an applicant or decision maker should react to this requirement.

Q111. Are the requirements and standards in Policy INF 3 for electric vehicle (EV) charge points on all major developments justified by proportionate evidence? Is it clear from the viability evidence whether residential and non-residential development in Cheshire East can viably support the costs of EV charging infrastructure, including higher voltage cabling and upgrades to the network? Is the policy effective in allowing for circumstances where the provision of such infrastructure is not viable or feasible?

- 2.2 We understand that the Government is proposing to introduce requirements for charging points under Schedule 1 to the Building Regulations 2010, which are expected to come into force in 2022. This will introduce a nationwide standardised approach to the provision of charging points in new buildings.

- 2.3 The Government’s intention is to ensure that the introduction of this requirement does not add such a burden on developers that certain developments become unviable. The consultation on this matter¹ notes that the costs of installing the cables and the charge point hardware will vary considerably based site-specific conditions in relation to the local grid. In certain cases, the need to install charge points could necessitate significant grid upgrades which will be costly for the developer. It proposes to exempt developments where the installation of charge points would result in developments not being taken forward as a result of this cost.

- 2.4 We also note that the Council’s Viability Assessment Update² recommends against a policy requirement for charging points:

“This is an area of rapidly changing technology and to which there is not yet a standard approach across manufacturers. Whilst there are clearly merits of installing chargers, we would recommend that consideration is given to simply ensuring the new home is wired with a 33amp fused spur to a convenient location to allow for later fitting of a vehicle specific charger in due course, that is appropriate for the particular vehicle that the householder may have”.

- 2.5 As noted in the Roger Hannah Viability Note at Appendix 3 of our representations to the SADPD Revised Publication Draft typically, the provision of car charging points will require higher

¹ Electric Vehicle Charging in Residential and Non-Residential Buildings (July 2019)

² Local Plan Site Allocations and Development Policies Viability Assessment Update – July 2020 §10.31

voltage cabling to be installed throughout the site resulting in higher abnormal off-site infrastructure costs. It is also possible that capacity for such voltage will not be available on the current network and therefore the costs to upgrade the network can be significant, requiring on site substations or off-site primary substation upgrades. These costs are extremely difficult to quantify and given the relatively recent policy introduction of car charging facilities, they are still largely untested. In addition, car charging points can exceed hundreds of thousands of pounds dependent on site, size and current capacity. As such, an allowance should be made in the Viability Assessment Update to take account of increased off-site abnormal costs resulting from this policy requirement. This allowance does not appear to have been included.

- 2.6 For the above reasons, we do not consider that it is necessary or appropriate for Policy INF3 to specify the provision of electric vehicle charging points, as requirements for the provision of charging points will be secured through Building Regulations.

Q112. Is criterion 2 of the Policy INF 3 clearly written and unambiguous? In particular, will it be evident to a decision maker what constitutes a development proposal that generates a 'significant amount of movement' and whether such proposals should be supported by a 'transport statement' or a 'transport assessment'?

- 2.7 Story has no comment on this matter as it would appear to be broadly consistent with the wording of the Framework [para 113].

Q113. Should the SADPD and Policies Map continue to safeguard the route of the Poynton Relief Road, given that it has not yet been completed, to ensure it is effective in supporting the cross-boundary proposals for Woodford Aerodrome?

- 2.8 Story has no comment on this matter.

Q114. For clarity and effectiveness, should further text be added to the justification for Policy INF 8 to explain how the impact of proposals for telecommunications infrastructure on air traffic safety will be assessed through consultation with the Safeguarding Authority for Manchester Airport?

- 2.9 Story has no comment on this matter.

Q115. For clarity and effectiveness, should it be made clear in Policy INF 10 that the criteria in section 1 apply to new moorings and those in sections 1 and 2 apply to new permanent residential moorings in section 3?

- 2.10 Story has no comment on this matter.

Q116. Is the SADPD positively prepared, justified and consistent with national policy in not making specific provision for roadside facilities and motorway service areas (MSAs) in Cheshire East or setting policy criteria to guide planning applications for such facilities? In the absence of such policies, would the LPS and the SADPD provide an effective policy framework for guiding planning applications, so that it is evident how a decision maker should react to development proposals for roadside facilities and MSAs?

- 2.11 Story has no comment on this matter.