

KNUTSFORD EMPLOYMENT LAND NOTE (CHESHIRE EAST SADPD EXAMINATION)

This note has been prepared by Pegasus Group following the Hearing Session Matter 2 - Planning for Growth in relation to the Examination of the Cheshire East Site Allocations DPD at the request of the Local Plan Inspector. It sets out what we consider to be the correct position of facts in Knutsford when measuring the amount of employment land made available for development within the town. It focuses on the two employment allocations identified within the Part 1 Local Plan Strategy (LPS) at Parkgate and North West Knutsford and considers what was stated in the LPS policy and subsequent planning applications.

In terms of the LPS position:

LPS Policy PG1 confirms that provision will be made for a minimum of 380 ha of employment land to support the growth of the local economy between 2010-2030.

LPS Policy PG7 confirms that Knutsford should achieve 'in the order of 15 ha of employment land'.

LPS Policy LPS36 indicated that the North West Knutsford site would deliver 7.5 ha for a high quality B1 Class Business Park.

LPS Policy LPS37 indicated that the Parkgate allocation would deliver 6 ha of employment land.

LPS Appendix A, Table A.7 indicates that the shortfall of 1.49 ha of employment land will be identified in Knutsford through the Site Allocations DPD process.

The Council correctly note that the net employment floorspace area identified at the Part 1 LPS evidence based reports were increased to allow for losses, plot development ratios (i.e. how a floorspace requirement equates to a site area requirement) and 20% flexibility was added. A direct requirement of the NPPF is to ensure planning policies are flexible enough to accommodate needs not anticipated in the plan period (#82f). As such, the Council built in the 20% flexibility factor into the minimum requirement set by Policy PG1 to provide an element of choice and competition in the employment land market. Whilst employment land losses across the Borough have not been as high as anticipated, it is also important to note that annual jobs growth in Cheshire East has far outstripped the original 0.7% per annum jobs growth used to inform the employment land requirement at the LPS stage. As such, there are various factors at play but the 380 ha of employment land still remains a minimum requirement of the LPS regardless.

A difference between the Council and ourselves, seemingly relates to what is reasonable to include the employment land measurement and plot ratios. The Council correctly note that a plot ratio of 35% was applied to industrial and warehouse floorspace and 42% to offices. These figures are influenced by the 2010 Roger Tym 4NW study (see link below) and the ekosgen report the Council commissioned for the LPS evidence base. The Roger Tym assessment confirms that a plot ratio needs to be applied to the floorspace to uplift the land requirement to take account of car parking, service yards and landscaping (which we take to be incidental landscaping one might find within the development). It makes no reference to '*any other mitigation measures needed for each development*' as suggested by the Council. Indeed, there is no reference to wider infrastructure requirements or land required to mitigate the impacts of development. Indeed, to include such land within the calculations (such as flood risk areas or large landscape buffers) could clearly distort the employment land requirements significantly site by site, depending on the surrounding context of each site and would suggest that it would be ok to include any land within a measurable red edge. That cannot be correct.

http://www.knowsley.gov.uk/pdf/LC13_4NW-SettingEmploymentLandTargets-for-NorthWestEngland.pdf

Parkgate, Knutsford (LPS37)

Area (ha)	Area Description and References	Full applications 17/6470M, 19/0732M and		Full applications 20/3340M and		Final Pegasus Comment
		Total Floorspace Approved (sq. m)	Floorspace to Site Area Ratio	Total Floorspace Approved (Sq. m)	Floorspace to Site Area Ratio	
7.13	This represents the red line boundary of the employment allocation at Parkgate Policy LPS37 in the LPS and the SADPD, with the eastern boundary following the course of Birkin Brook. The eastern part of the site includes a Flood Zone (Zones 2 and 3) (see point 'e' of LPS37 policy and the Council's SFRA) and an area required for a 50m wide landscape buffer/bund to mitigate impacts on the residential development to the north (see point 6 of LPS37 policy). As such, not all of the site is available/suitable for employment development.	23,445	33%	19,925	28%	Site area dismissed by Pegasus on the basis that it includes large areas of undevelopable land for employment purposes relating to steep contoured areas, flood zones and landscape mitigation areas required by Policy LPS37. It is noteworthy that this would deliver a very low floorspace to site area ratio and below the ratio utilised by the Council as part of the evidence base for the LDS.
6.51	This represents the red line boundary of the full planning applications associated with this site, which avoids Flood Zone 3 but includes the landscape buffer/bund mitigation area to the north (see point 6 of LPS37 policy). It also includes an area of Flood Zone in the southeast corner of the site that is required to provide an outflow connection point to the Brook but is not developable for employment use.		36%		31%	Site area dismissed by Pegasus on the basis that it still includes areas of undevelopable land for employment purposes relating to flood zones and landscape mitigation.
6.00	This represents the area of employment land that was deemed to be achievable under Policy LPS37 point 2 and also referenced on page 405, Table A.7, Appendix A of the LPS.		39%		33%	Site area between these two figures is deemed to represent the developable employment area of the site.
5.38	This is the area of 'committed' employment land identified within the Council's 2020 Annual Monitoring Report (see document BD04, page 154, Appendix A, Table A7), which would have been measured following the 2019 planning consent being issued. This area omits the approved landscape bund and flood risk areas and therefore represents to total developable area of this employment site.		44%		37%	
Comments on Planning Application Approvals		This proposal was only part implemented. The original large proposed industrial units to the east could not be accommodated in the end due to stability/viability issues associated with required retaining structures required due to the steeper topography of this part of the site adjacent to the Brook.		This is the proposal that is now coming forward on the site and is largely complete. It creates a much wider stand-off area from Birkin Brook due to the topography and flood risk issues within this part of the site.		Overall we consider that the employment land delivered at the Parkate allocation cannot be regarded as being more than 6ha and is arguably less.

It must also be noted that the Parkgate allocation was not a Green Belt release site and was previously identified in the Macclesfield Local Plan as an employment allocation in its entirety. The provisions of the Macclesfield Local Plan required access needed to be obtained from the south under the railway line, which proved undeliverable. As such, an outline application on the 10 ha of land above the existing industrial estate was approved for residential development under application ref: 13/2935, which was approved on 23rd June 2015 and is now under construction. As such, the town of Knutsford lost just over 10 ha of available employment land in 2015 or 2017 if the adoption date of the LPS is utilised. Either way, both dates are during the LPS plan period. This loss is not recorded in the Council's monitoring report as losses are accounted for within the minimum boroughwide requirement for 380 ha set by Policy PG1. Nonetheless, it still represents a significant consideration in the context of employment land needs within Knutsford, which the Council's evidence to the SADPD process has not referred to.

North West Knutsford (LPS37)

Area (ha)	Area Description and References	Floorspace areas and ratios	Final Pegasus Comment
7.5	This represents the area specified in Policy LPS36 (see point 1 of Policy on page 304) and the suggested area of employment land under description of development the outline planning application ref: 19/0032M.	No Reserved Matter applications submitted or approved. However, the outline application includes full approved details of required highway infrastructure which in this case includes a large roundabout access off Manchester Road that cuts into the site ownership/allocation boundary and has been designed to be of a scale/radii to accommodate a future link road around the western side of Knutsford onto Safeguarded Land to the west and then onto Northwich Road to the south (see point 'n' under Policy LPS36). This reduces the amount of available employment land for development down to 6.75 ha as highlighted on the approved Land Use Plan.	We do not consider this site area can be applied any more on the basis that the approved access drawings to the outline application, which are approved in full, reduce the available area for employment development considerable.
6.75	This represents the area of employment land illustrated on the proposed Land Use Plan submitted as part of planning application ref: 19/0032M (see page 7 of Pegasus Group's Matter 2 Hearing Statement which is plan ref RG-M-07 Rev F). This plan is specifically referenced under condition 3 of that permission, which states: ' <i>The development hereby approved shall be carried out in accordance with the details shown on plan reference RG-M-01 Revision F, RG-M-07 Revision F and MRK-BWB-HGNXX-SK-C-0001-S1 Revision P3 received by the Local Planning Authority on 2 January 2019.</i> '		This area represents the developable part of the site for employment uses as required by Condition 3 of the planning consent by reference to an approved Land Use Plan. It represents an area that is consistent with the proposed highway infrastructure requirements that have been specifically designed to accommodate development over and above this site and have therefore reduced the developable area of the site for employment floorspace.

Summary of Employment Land Requirements in Knutsford to be Addressed by the SADPD process

15.00	LPS Employment Land Target for Knutsford set by Policy PG7.
12.75	Maximum developable employment land areas within Knutsford based on LDS site allocations LPS36 and LPS37 based on details provided above (6ha + 6.75ha).
2.25	Shortfall in Employment Land in Knutsford based on target in LPS that should be addressed by SADPD process.
15%	Shortfall Ratio against LPS Target. This is not considered to be ' <i>in the order of</i> '.

Additional Exceptional Circumstances to warrant reviewing employment land requirement in Knutsford through the SADPD process

10.29	Loss of Employment Land at Parkgate, Knutsford following approval of outline residential application in 2015 and adoption of LPS in 2017.
2.46	Actual Net additional employment land provided in Knutsford between 2010-2030 based on assessment above.
12.54	Shortfall in Knutsford Employment Land Target if Parkgate loss is accounted for.
84%	Shortfall Ratio against LPS Target if Parkgate Employment Land Loss is accounted for.

Final Pegasus Comments

1. Pegasus Group are of the strong opinion that the 2.25 ha shortfall should be planned for as part of the SADPD to adhere to the settlement hierarchy and sustainable patterns of development policies in the LPS (Policy PG7).
2. Pegasus Group do not consider that a 15% (or even 10%) shortfall can be regarded as being 'in the order of', particularly in the context of Knutsford that has seen a very minor increase in the amount of employment land provided over the plan period.
3. With regard to the Council's approach to assessing what constitutes 'in the order of', the Council have applied an inconsistent approach when considering employment and housing targets set by Policy PG7 in the LPS.
4. It is evident from the Council's approach set out in Document ED05 that a shortfall of between 8%-13% against the housing targets for Middlewich and Poynton (as targeted under Policy PG7) has promoted the Council to allocate more sites in the SADPD for these settlements.
5. In Middlewich, the shortfall in dwellings was 153 against a LPS PG7 target of 1,950 (=7.8% shortfall). The Council are proposing to allocate more housing land in Middlewich as part of the SADPD process.
6. In Poynton, the shortfall in dwellings is 88 homes against an LPS PG7 target of 650 homes (=13.5% shortfall). The Council are proposing to allocate more housing land in Poynton as part of the SADPD process.
7. Meeting Knutsford's employment needs in other Key Service Settlements or the Main Towns is not sustainable due to the distinct lack of public transport provision and distances to the nearest settlements from Knutsford.
8. The Council have not assessed whether allocating more employment land in Knutsford to meet the shortfall would actually have any harmful impacts and how those would be balanced against the benefits of actually meeting Knutsford's PG7 employment land target. We consider the SA should have tested this as a reasonable alternative even in the context of the 1.49ha shortfall identified within the LPS for Knutsford.
9. Based on the above analysis and factual position, we do not consider the SADPD is positively prepared, justified or consistent with national planning policy, which confirms '*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and the wider opportunities for development.*'
10. The proposed additional land located to the immediate south of Parkgate Farm and north of Parkgate Industrial Estate put forward by Tatton Estate reached the Stage 2 sieving process but was dismissed by the Council on the basis of there being no local need. We disagree with that conclusion based on the above analysis and consider this land would be suitable for a courtyard styled office employment use and/or live work units and this would meet the 'in the order of' needs of Knutsford set by Policy PG7 of the LPS.