

<b>Planning Reference No:</b>	<b>P09/2392C</b>
<b>Application Address:</b>	<b>Land North of Crewe Road, Sandbach CW11 4QD</b>
<b>Proposal:</b>	<b>Application for Outline Permission for the erection of up to 37 Dwellings (Access Only)</b>
<b>Applicant:</b>	<b>Hollins Strategic Land</b>
<b>Application Type:</b>	<b>Outline (Access only for determination)</b>
<b>Ward:</b>	<b>Sandbach</b>
<b>Earliest Determination Date:</b>	<b>6 November 2009</b>
<b>Expiry Dated:</b>	<b>3 December 2009</b>
<b>Date of Officer's Site Visit:</b>	<b>7 October 2009</b>
<b>Date Report Prepared:</b>	<b>8 November 2009</b>
<b>Constraints:</b>	<b>Open Countryside Wildlife Corridor</b>

#### **SUMMARY RECOMMENDATION:**

**REFUSE.**

#### **MAIN ISSUES:**

**The acceptability of the development in principle**  
**Layout, design and street scene**  
**Sustainability**  
**Impact on neighbour amenity**  
**Landscape and ecology**  
**Highway considerations**  
**Drainage and flood risk**

## **1. REASON FOR REFERRAL**

This application has been referred to the Southern Planning Board as the scheme is a major development for over 10 houses.

## **2. DESCRIPTION OF SITE AND CONTEXT**

The site lies to the south of Sandbach and is currently accessed from a small private track known as Zan Drive off Crewe Road that leads to the Zan Industrial Park.

To the north lies the Wheelock Rail Trail whilst to the east is open countryside and a Wildlife Corridor. To the south of the site is Zan Drive off which lies a number of residential properties, a small parking area in a copse of trees and the industrial estate whilst to the west are a number of residential properties and beyond that Crewe Road.

The site itself is relatively open comprising of a grazing paddock which is surrounded by trees and hedges. There are also the remnants of a former hedgerow that passes through the centre of the site and is marked by some small trees. The majority of the site to the west is relatively level but falls away to the east where it approaches a belt of trees that bound the site.

The site is also overlooked by a number of residential dwellings off Zan Drive and Crewe Road.

### **3. DETAILS OF PROPOSAL**

Although the application is outline only with only access for detailed consideration, supporting information has been submitted to accompany the application together with an indicative layout.

It is intended that the development be mainly be served off a new access off Crewe Road with four dwellings being served from Zan Drive. The main development area is to have a main spine road running through the development off which a number of housing clusters will be served.

As the application is outline, full elevation details for all the properties has not been provided but two indicative sketches of the street scene facing the Wildlife Corridor to the east and Zan Drive to the south have been submitted. These sketches show the intended form of development as two storey dwellings with forward projecting gable ends built in a traditional style. The position of two key note buildings has also been indicated but as no plans or elevations have been provided for these buildings it is not possible to comment further on these elements of the scheme.

Although a parking area for 13 cars has been shown to the front of the properties off Zan Drive, no detailed parking arrangements have been shown for the other properties within the heart of the development area.

### **4. RELEVANT HISTORY**

In 2000, outline planning permission (ref. 31927/1) was refused for the development of the site for housing. The following three reasons for refusal were given :

1. Imbalance of housing supply across the Borough,
2. The development would be unlikely to male a positive contribution to the character of the area and
3. The density of the development would be too low thereby conflicting with the advice in PPG3: Housing.

### **5. POLICIES**

#### **POLICIES**

##### **National Guidance**

PPS1: Delivering Sustainable Development  
PPS3: Housing

##### **Regional Spatial Strategy**

DP1 Spatial Principles  
DP2 Promote Sustainable Communities  
DP3 Promote Sustainable Economic Development

DP4 Make the Best Use of Existing Resources and Infrastructure  
DP7 Environmental Quality

## **Congleton Borough Council Local Plan First Review**

GR1 General Criteria  
GR2 Design  
GR3 Design  
GR5 Landscape  
GR6 Amenity and Health  
GR10 New Development  
GR18 Traffic Generation  
PS3 Settlement Hierarchy  
PS8 Open Countryside  
PS4 Towns  
NR1 Trees and Woodlands  
NR4 Wildlife Corridor  
E10 Re-use of Redevelopment of Existing Employment Sites  
H1 General Scale of New Housing Development  
H2 General Scale of New Housing Development  
H6 Open Countryside  
H13 Affordable and Low-cost Housing

## **6. CONSULTATIONS (External to Planning)**

### **Environmental Health**

No objection to the principle of development however four conditions have been recommended in respect of the following matters:

- Submission of a contaminated land Phase 1 Construction phase of development:
- Protection from noise during construction for neighbours
- Limit to hours of pile driving and
- Submission of an air quality survey

### **Strategic Highways Manager**

The Strategic Highways Manager has viewed the detail of this application and finds that the application should, but does not, offer a Transport Statement in accordance with the DfT Transport Assessment Guidelines.

In terms of the access detail, the offered design does not comply with the design standards laid down in the Design Manual for Roads and Bridges.

In addition, the proposal to generate increased traffic from Zan Drive without suitable improvement is not acceptable. In any event the Strategic Highways Manager recommends that one junction should serve this site, if an acceptable design solution is available.

The detailed drawing of the proposed junction shows an access road of too high a standard to serve such a low number of dwellings, whilst the visibility splays are sub-standard and do not consider the vertical element.

Given the above concerns the Strategic Highways Manager must recommend refusal of this application on highway safety grounds and further on lack of technical documentation in support of the application.

*Junction standard is too high still, giving over capacity.*

*Junction still fails to meet DMRB standards in a number of areas.*

*Zan Drive should not be used to serve any of the site.*

## **English Heritage**

No objection to the application.

## **Nature Conservation Officer**

The Nature Conservation Officer has raised the following comments in respect of various protected species:

### Bats

No evidence of bats roosting within the properties to be demolished was recorded, but bats were recorded foraging and commuting around the site and a mature ash tree at the entrance of the site off Zan Lane has potential to support a roost. This tree should be retained. If not then a further survey may be required to confirm bats are absent prior to the determination of the application.

The potential adverse impact of lighting on bats, which are a Biodiversity Action Plan (BAP) species and so a material consideration, has been highlighted in the submitted ecological survey which recommends that any lighting used during the construction or operation period should be directional and screened. I advise that a condition is attached to this application that the lighting scheme be agreed with the LPA.

In order to increase the potential for roosting bats the submitted report recommends that features for bats should be incorporated into the development. This should be secured by means of a condition as described below in the breeding bird section.

### Badgers

A disused badger sett has been recorded in close proximity of the proposed development site. As there is no evidence of badgers being active on the site they do not currently present a constraint on the development. However, badgers are known to reuse abandoned setts and excavate new ones within a short time scale consequently the submitted ecological report recommends that the sett is re-examined prior to the commencement of development. I recommend that a condition be attached to this permission that any reserved matters application be supported by an additional badger survey be undertaken and submitted to the LPA.

### Breeding Birds

A number of breeding birds have been recorded at the site. Two of these House Sparrow and Song Thrush are BAP priority species and so a material consideration. Both of these species are often closely associated with dwellings and gardens so provided the recommendations of the ecological survey report relating to the use of native species in the

landscaping scheme and the incorporation of specific bird boxes for house sparrow are fully implemented the proposed development should not have a significant adverse impact upon these species.

The officer has recommended that the following two conditions are attached:

- Prior to the commencement of development the applicant to submit detailed proposals for the incorporation of features into the scheme suitable for use by roosting bats and breeding birds including House Sparrow, Swifts and Song Thrush.
- Prior to any commencement of works between 1st March and 31st August in any year, a detailed survey is required to check for nesting birds. Where nests are found in any building, hedgerow, tree or scrub to be removed (or converted or demolished in the case of buildings), a 4m exclusion zone to be left around the nest until breeding is complete. Completion of nesting should be confirmed by a suitably qualified person and a report submitted to the Council.

### Ponds

The proposed development would result in the loss of two small artificial garden ponds. Ponds are a Local and National BAP priority habitat and so a material consideration. Whilst garden ponds might not always have sufficient value to fall into this category in this instance the ponds have been recorded supporting two species of amphibians and the submitted report recommends that the loss of these ponds is compensated for through the construction of a replacement purpose designed wildlife pond. To avoid the potential loss of biodiversity through the destruction of these ponds I recommend that the indicative layout be amended to show the location of a replacement pond and the design of the pond should be agreed by the LPA. This matter may be secured through an appropriate condition.

### Retention of habitats

There is a small coppice area present on site that has some nature conservation value. The retention of this area is recommended in the submitted ecological report. Confirmation that this area will be retained should be sought from the applicant.

### Management of the site and the adjacent Sandbach Wildlife Corridor

The submitted ecological survey included proposals for the positive management of the adjacent designated wildlife corridor. These proposals are welcomed and if fully implemented will help deliver an overall gain for biodiversity from the proposed development in accordance with PPS9. As this area is outside the application boundary a Section 106 agreement may be required.

A condition requiring a management plan for the on site landscaping will also be required.

### Landscaping

I assume a standard landscaping condition will be attached to any permission granted. This is required from a nature conservation perspective to ensure that appropriate species are planted.

### **United Utilities**

United Utilities have confirmed they have no objection to the proposal provided the site is drained on a separate system, with only foul drainage connected into the foul sewer.

Surface water should discharge directly in to the adjacent watercourse and may require the consent of the Environment Agency. If surface water is allowed to be discharged to the public surface water sewerage system we may require the flow to be attenuated to a maximum discharge rate determined by United Utilities.

It has also been noted that a public sewer crosses runs at the rear 432-450 Crewe Road and we will not permit building over it and will require 24 hour access for maintenance and repair. We will require an access strip width of 6 metres, 3 metres either side of the centre line of the sewer which is in accordance with the minimum distances specified in the current issue of "Sewers for Adoption". Deep rooted shrubs and trees should not be planted in the vicinity of the public sewer and overflow systems.

## **Spatial Planning**

Planning policy comments have been provided on the application from the Spatial Planning section. They have addressed the following points:

### Housing Supply

With the introduction of PPS3, the Council now has to ensure that it has a deliverable 5-year supply of land for housing and if this is not the case the Council should consider favourably suitable planning applications for housing. As stated above the RSS requests that there is the capacity for 300 dwellings per annum average, equating to 1500 dwellings over 5 years. The up to date housing supply figure for the Borough as of 30/06/09 is 1,460 dwellings (net), which includes; gross dwellings balance under construction (259), gross dwellings with planning permission (993), allocations (250), (Wheelock Mill has been discounted as this site is not considered as 'available now' in terms of PPS 3) and the loss of 42 dwellings. Therefore we have less than a five-year supply of housing against the RSS requirement. However, it also needs to be borne in mind that several applications, totalling 385 dwellings have recently been approved subject to the signing of Section 106 Agreements. This would bring the housing land supply total to 1,845 dwellings (5.6 years supply).

### Affordable Housing Statement

The statement refers to an SPG, however this should state SPD (6). The statement has grouped together both affordable and low-cost housing, with 20% provision proposed, but these need to be dealt with separately. According to SPD6 the definition of affordable housing differs from that within the Local plan in that it no longer includes low-cost housing. The general minimum proportion of affordable housing for any site will normally be 30%. In addition the council will require the provision of an element of the market housing to be unsubsidised low-cost market housing, which would be a minimum of 25%. Therefore the proposed amount of affordable and low-cost housing is insufficient. The SPD suggests that there is a low proportion of terraced property as well as flats and rented accommodation. The price for terraced dwellings stated in the Statement is incorrect, it should be £110,540.

### Housing Density

PSS3 makes reference to a housing density of 30 dwellings per hectare, which should be used as a guide until local densities are in place. At this density 41.7 dwellings would be provided. The proposal is for a density of 26.6dph.

## **Public Rights of Way Officer**

The Public Rights of Way officer has written to confirm that the development will not affect any existing rights of way.

## **Senior Landscape and Tree Officer**

The Officer has commented that there are a number of trees on/adjoining the site including a copse in the south east corner, trees adjoining the Wheelock walkway and trees in the Sandbach Wildlife corridor. In the absence of a tree survey, it is their view that insufficient information has been submitted in order for the LPA to fully determine the impact of the development on trees. From the indicative layout and my observations on site, it appears the development would potentially result in the loss of existing trees and vegetation considered to have local landscape and nature conservation value.

The development site extends into the Sandbach Wildlife Corridor. I cannot support any encroachment into this area. The applicants Design and Access Statement suggest that it is a cartographic error that the Wildlife Corridor boundary is drawn to include part of a grazed field. The officer has put forward an alternative view in that the position of the boundary was intended to secure complementary habitat and buffer to the adjacent woodland to the east.

## **Housing Research and Monitoring Officer**

The Officer has commented in respect of the application as follows:

### Local Housing Need

The supply and demand analysis shows an outstanding shortfall of affordable units within Sandbach. There is a significant shortfall of 2 and 3 bedroom houses and it is this shortfall which the Council would be seeking to reduce.

The housing waiting list shows a need for all property types in the Sandbach area but the number of 2 and 3 bed properties available for social rent are drastically below the demand on the waiting list.

### Affordability

In line with Supplementary Planning Document 6 (Affordable Housing and Mixed Communities) the Council would seek 30% of the site to be classed as Affordable Housing. This housing should be in line with the definition in PPS3 which includes social rented housing or intermediate affordable housing including shared equity schemes. Of this 30%, and in line with the recommendations in our Housing Needs Survey desktop review of 2006, we expect 50% to be social rented and 50% to be either shared ownership or discounted for sale.

### Site layout

It is expected that the affordable units to be 'pepper-potted' throughout the site.

## **7. VIEWS OF THE PARISH / TOWN COUNCIL**

At the time of the preparation of the report, no comments have been received.

## **8. OTHER REPRESENTATIONS**

A number of letters of correspondence have been received from neighbours. One neighbour has commented that they support the application on the basis that the property they own 446 Crewe Road, is an unsightly property in a poor state of repair and its removal would benefit the street scene.

The other 13 letters however have opposed the application on the following grounds:

- Poor access front Zan Drive and Crewe Road
- Zan Drive is well used and serves 11 properties
- There is a demand for industrial units on the industrial estate which may be lost to development if this scheme is approved
- The design of the properties does not match the character of the area
- There is insufficient parking in the area already
- Crewe Road is a dangerous highway
- There are claims of badgers, bats and adders, all protected species on the site.
- Impacts on existing residential privacy and amenity levels
- Loss of an existing Greenfield site
- The site is designated a Green Belt
- The density of the development would be too high for that area
- The sewer along Zan Drive is insufficient to cater for the additional demand
- The loss of 444 and 446 Crewe Road would be detrimental to the street scene
- The decision is premature following the refusal in May 2000
- The Title Deeds for the properties in Zan Drive allow full access along the track for the residents.
- The development would have a detrimental impact on the neighbours at 448 Crewe Road
- The development would bring about unacceptable impact on local amenities including schools and doctors in terms of overloading existing services.

## **9. APPLICANT'S SUPPORTING INFORMATION**

### **Design & Access Statement: Sedgwick Associated**

This document provides details on the history of the site, the surrounding context of the local area and the policy framework surrounding the development. The report also seeks to expand on the justification for the development proposed.

### **Ecological Survey and Assessment: Environmental Research and Advisory Partnership**

The applicants have provided a desktop survey together with an Extended Phase 1 Habitat Survey for the site. This has looked at a number of protected species.

This work has identified no significant wildlife interests or constraints that would affect the principle of development nor would the proposal have an adverse impact on the adjacent Sandbach Wildlife Corridor.



## **Flood Risk Assessment: Bett Associates**

This report has looked at the issue of floodwater runoff and the impact on neighbours. The site has been classified as Flood Zone 1 (low risk) in accordance with the guidance in PPS25: Flooding

To control runoff, the applicants have proposed the following three measures:

- Discharge to watercourse
- Ground infiltration and
- Outfall to the adopted sewer network

## **Ground Contamination Desk Study: Sedgwick Associates**

The contamination survey has looked at the character of the site and any impact on possible future residential use of the site.

From the analysis undertaken, there is nothing to indicate that the site should not be developed for residential use. As this application is outline only, it is recommended that further survey work be undertaken once the final position and design of the buildings is known

## **10. OFFICER APPRAISAL**

### **Principle of Development**

At the heart of the application is whether the principle of development on the site can be accepted. Although the site is Greenfield in nature, part of which is outside the settlement zone line in open countryside one of the key considerations is whether the Council is in a position to meet its five years land supply targets.

Based on the findings of the Strategic Planning Officer, it is apparent that for the former Congleton Borough Council area is close to providing a 5 years supply of housing however this is dependant on the viability of the allocated sites in coming forward for development during the relevant period, if any of the sites cannot be delivered, then the Council may fall short of its 5 year target.

On this analysis, the principle of developing within the settlement zone line for Sandbach would be difficult to resist especially when it is considered that the regional housing targets are set as a minimum and not a maximum limiting the amount of development that can take place.

What is of more concern however is the element of development on the Wildlife Corridor outside the settlement zone line. Whilst this is relatively small parcel of land amount to just under 0.2 Ha and is not proposed for residential development, the proposal does seek to alter the character and nature of this parcel of land to one more associated with urbanisation. It has been described on the indicative layout plan as being transitional open space but given the number of dwellings proposed (37) it is likely that this would result in the space being used for formal recreation provision to meet the needs of the residents. This would consist of formally managed space mown and cleared on a regular basis far removed from its current form.

It is considered that the resultant layout would result therefore in the loss of the open countryside to residential development and the scheme would begin to encroach on the character of the open countryside to its detriment contrary to policy.

It is noted as well that the density of development at just under 27 dwellings per hectare (dph) falls slightly short of the 30 dph target set out in PPS 3. In paragraph 7.7 of the Design and Access Statement simply note this as being representative of the area. It is not clear if this is the wider area of Sandbach or just the immediate area surrounding the site but to simply echo existing levels with no contextual analysis of the area or explanation of why the development should not meet established national targets is a failure to make the best possible use of land.

If development is to take place on a greenfield site, then every suitable effort should be made through optimising densities without harm to neighbours to minimise the need for the take up further greenfield sites in the future. This will subsequently help to suppress any latent demand for housing land and control the future development of such sites to protect the semi-rural character and appearance of Sandbach and control the spread of urban sprawl into the countryside.

## **Contributions**

In light of the quality of development being proposed, it is noted that limited attention has been given to the development meeting the requisite obligations as set out in policy to ensure that the scheme addresses any detrimental impacts that the scheme may have on the surrounding infrastructure.

In particular, it is noted that insufficient affordable housing has been provided on the site. Whilst recent appeal decisions show consideration should be given to market viability, no valuation exercise has been undertaken in this case.

The provision of only 7 units out of the 37 proposed falls short of the 30% expected. Furthermore, any provision should be split equally between social rented and equity share. This is not what is being offered by the applicant rather, they are just seeking to offer 3 units with no discount but at a lower cost than most dwellings due to their smaller size and just 4 units discounted against market housing at 40% below current market levels.

This is not felt to be sufficient to meet the policy requirements.

## **Layout, Design and Street Scene**

As this application is outline with access only for detailed consideration, it may be unfair to critically analyse the layout set out on the indicative drawing. This scheme however does show the development coming forward in two distinct areas, that off Crewe Road and that off Zan Drive.

In looking at the Crewe Road accessed properties, it is felt that the layout could be carried forward to create an acceptable scheme. There are some question marks over whether sufficient garden/ circulation space would be allowed if the layout were slavishly adhered to but as this is outline scope would exist for the footprint of the buildings to be amended.

As mentioned above however is the issue of open space and how this would integrate into the scheme. Given that the principle of utilising land designated as open countryside and wildlife corridor would be unacceptable, this would mean that the layout would have to be comprehensively amended to incorporate the space into the scheme or the development would not be able to provide the required space. Either of these options is felt to be unacceptable.

Note is also made of the proposed four houses off Zan Drive which should necessitate the clearance of the existing copse of trees. These form a valuable landscape feature and in light of the comments of the Landscape officer and the absence of a tree survey, it is felt that this development would be unacceptably harmful on these grounds.

### **Amenity**

As this is an outline application with layout reserved, it is not possible to state that the development will have an unacceptable impact on the amenity of the neighbouring residents at this time. There is some concern as expressed earlier however that the garden spaces for some of the proposed dwellings is limited and this may need to be reviewed in a detailed layout. At this time though, no substantive reason for refusal on this point could be sustained.

### **Landscape and Ecology**

The EC Habitats Directive 1992 requires the UK to maintain a system of strict protection for protected species and their habitats. The Directive only allows disturbance, or deterioration or destruction of breeding sites or resting places,

- in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment

and provided that there is

- no satisfactory alternative and
- no detriment to the maintenance of the species population at favourable conservation status in their natural range

The UK implemented the Directive by introducing The Conservation (Natural Habitats etc) Regulations 1994 which contain two layers of protection

- a requirement on Local Planning Authorities ("LPAs") to have regard to the Directive's requirements above, and

- a licensing system administered by Natural England.

Circular 6/2005 advises LPAs to give due weight to the presence of protected species on a development site to reflect EC requirements. "This may potentially justify a refusal of planning permission."

PPS9 (2005) advises LPAs to ensure that appropriate weight is attached to protected species "Where granting planning permission would result in significant harm .... [LPAs] will

need to be satisfied that the development cannot reasonably be located on any alternative site that would result in less or no harm. In the absence of such alternatives [LPAs] should ensure that, before planning permission is granted, adequate mitigation measures are put in place. Where ... significant harm ... cannot be prevented or adequately mitigated against, appropriate compensation measures should be sought. If that significant harm cannot be prevented, adequately mitigated against, or compensated for, then planning permission should be refused.”

PPS9 encourages the use of planning conditions or obligations where appropriate and again advises [LPAs] to “refuse permission where harm to the species or their habitats would result unless the need for, and benefits of, the development clearly outweigh that harm.”

The converse of this advice is that if issues of detriment to the species, satisfactory alternatives and public interest seem likely to be satisfied, no impediment to planning permission arises under the Directive and Regulations.

In this case, it is felt that it has not fully been proven that the development will not possibly cause some harm to protected species in particular bats through the loss of the trees and other species through the loss of the ponds. Insufficient detail has been provided to show that this can be achieved especially considering the demands that may arise if the public open space in to be incorporated into the area within the settlement zone line.

It is also felt that as no analysis of alternative sites has been provided and the development itself is not of overriding public interest then the proposal at the current time does not meet the requirements of the EC Habitats Directive and cannot be supported.

## **Highways and Parking**

The Highways Officer has looked at the proposal and has raised concerns with both access points.

His conclusion is clear in that the development fails to meet the required design standards in terms of the Crewe Road junction and that Zan Drive should not be used to serve any of the new housing.

Residents in the area have submitted photographic evidence of the character of the area showing extensive parking on nearby verges. Whilst this is not a permanent characteristic of the area dependant of residential occupancy levels, there is clearly the danger of visibility splays being compromised. It may be possible to use highway controls to regulate the parking in the area but this would not overcome the inherent design flaws in the area and the unsuitable nature of the access proposed between 442 and 448 Crewe Road.

Furthermore, the use of Zan Drive which is a private drive already serving 11 properties cannot be countenanced due to the potential for increased congestion. At the junction with Crewe Road, Zan Drive is single carriageway and the risks for causing traffic to back up onto Crewe Roads through traffic seeking to egress the site must be a factor in looking to ensure highway safety.

## **Drainage and Flood Risk**

Although United Utilities have expressed their concerns over the need for the development to drain away through sustainable means, the applicants have sought to use a traditional approach of partially draining into sewers and the open watercourse.

Whilst some of the impacts can be addressed through conditions e.g. the use of petrol interceptors, it is felt that the overall approach fails to ensure a suitable sustainable drainage arrangement for the development proposed.

Consideration is given to the fact that this scheme is outline only but given that such drainage measure which may include attenuation tanks can have a significant impact on the layout of the site, it is felt that this matter should be addressed at the outline stage and not left in abeyance till the reserved matters stage when it may be too problematic to provide a suitable drainage scheme to address the concerns of United Utilities.

## **11. CONCLUSIONS**

Having due regard to all other matters raised, it is considered that the proposal fails to comply with the relevant Development Plan policies, as set out above. Accordingly, it is recommended that the application be refused as set out below.

## **12. RECOMMENDATIONS**

**REFUSE** subject to the following reasons:

- 1. The proposal would result in the loss of Open Countryside to residential development contrary to Policy PS8 of the Local Plan.**
- 2. The development would result in harm to the adjacent Wildlife Corridor by allowing residential development to encroach on the edge of the corridor contrary to Policy NR4 of the Local Plan.**
- 3. Insufficient evidence has been put forward to substantiate the proposed density of 27 dph which is below the recommended level of 30 dph in PPS3: Housing thereby resulting in inefficient use of land contrary to paragraph 69 of PPS 3.**
- 4. The proposed access arrangements would be harmful to existing highway arrangements potentially resulting in unacceptable highway safety contrary to Policy GR18 of the Local Plan.**
- 5. Insufficient evidence has been put forward to show that the proposed development would not result in a harmful impact on protected species contrary to the EU Wildlife Habitats Directive**
- 6. The applicant has failed to provide sufficient drainage details to show that the proposed development would not result in harmful surface water runoff rates contrary to Policy GR2 of the Local Plan**
- 7. The proposed development would potentially result in the loss of trees and hedgerows contrary to policy NR1 of the Local Plan.**
- 8. The development has failed provide sufficient affordable housing in the absence of a viability report contrary to Policy H13 of the Local Plan.**

Location Plan: Cheshire East Council Licence No. 100018515

