

Cheshire East Local Plan Strategy

Appendix 1: Local Plan Strategy Examination Report of Additional Evidence

July 2015



CHESHIRE EAST LOCAL PLAN STRATEGY EXAMINATION

EXAMINATION SUSPENSION – REPORT OF ADDITIONAL EVIDENCE

Contents

Introduction	Pg 2
Background	Pg 3
Summary of Additional Work	Pg 8
Other Additional Work	Pg 41
Addressing the Inspector's Concerns	Pg 59
Suggested Revisions to the Submitted Local Plan Strategy	Pg 60
Effect of Suggested Revisions to the Local Plan Strategy	Pg 65
Conclusion	Pg 71

Technical Annex List:

- **Annex A – Schedule of Additions to the Local Plan Evidence Base**
- **Annex B – Checklist of Evidence including cross reference to relevant paragraphs in the Inspector's Interim Views**
- **Annex C – Schedule of Suggested Revisions to the Local Plan Strategy**
- **Annex D – Housing Requirement Technical Annex**
- **Annex E – Safeguarded Land Technical Annex**
- **Annex F – New Green Belt and Green Gap Technical Annex**

CHESHIRE EAST LOCAL PLAN STRATEGY EXAMINATION

EXAMINATION SUSPENSION – REPORT OF ADDITIONAL EVIDENCE

1. INTRODUCTION

- 1.1 In November 2014, the Inspector appointed to examine the Local Plan Strategy (LPS) provided the Council with his Interim Views on the soundness and legal compliance of the submitted LPS. On 15 December 2014, the Inspector formally suspended the examination of the LPS to allow the Council to undertake the additional work to address the concerns he raised about the soundness of the LPS in his Interim Views.
- 1.2 This report presents a synopsis of the output of the additional work undertaken during the suspension period which supplements the Local Plan evidence base and requests Cabinet approval to submit suggested revisions to the submitted LPS for the Inspector's consideration.
- 1.3 The suggested revisions reflect the changing economic context of Cheshire East and the impact on housing requirement. The suggested revisions do not involve any change to the overall LPS and therefore, fundamentally, it is the same Local Plan supported by an updated evidence base.
- 1.4 At the start of Local Plan period the nation remained in the grip of the deepest recession for decades. This inevitably coloured the critical assumptions about future growth, development and migration. By 2015

the economic climate has changed and this enables us to move forward with greater assurance of our future prosperity.

- 1.5 The additional evidence here reflects this changing context with the economic projection moving from 0.4% to 0.7% growth rate. As the economy continues to recover so we are better able to gauge its future potential. In turn the latest demographic data, combined with more optimistic projections for in-migration create a fuller picture of the likely pattern of our workforce and population. Some will say still that we have not set our target high enough and that we should be aiming for 0.9% growth or higher. We believe however that we need to base our projections on growth in the private sector and that we need to set a realistic, deliverable position which is 0.7% growth.
- 1.6 This evidence then drives the need for an uplift in housing numbers – 36,000 homes over a 20 year period, importantly incorporating accommodation for the Borough's ageing population. Additional work to update the Green Belt Assessment and additional highway studies then inform an amended Spatial Distribution of Development.
- 1.7 Housing numbers already committed across the Borough total over 32,000 reflecting the efforts of the Authority and the growing strength of the housing market.
- 1.8 The updated evidence base justifies the suggested revisions to the submitted LPS. These revisions, along with the full suite of evidence will be submitted to the Inspector by the end of July.

2. BACKGROUND

- 2.1 In September 2014, the LPS examination hearings commenced over three weeks in September 2014. The Inspector identified a total of 15 broad Matters, which were due to be considered over six weeks of

hearing sessions. After three weeks of hearing sessions, the Inspector decided to temporarily adjourn proceedings pending his consideration of the matters discussed.

2.2 Following the adjournment of the hearing sessions the Inspector issued, on 6 November 2014, his Interim Views on the legal compliance and soundness of the submitted LPS. As the title suggests this was not intended to be the Inspector's final conclusions on the soundness and legal compliance of the LPS but outlined his preliminary views based on the documentation submitted (by all parties) and his initial consideration of the matters discussed at the Examination hearing sessions held in September 2014.

2.3 In short, the Inspector indicated in his Interim Views that he was satisfied that the LPS had met the legal requirements, including the Duty to Co-operate. However, he was not convinced that he would be able to find the LPS sound, on a number of grounds. These concerns fell into four broad areas:

- Alignment of the housing and employment strategies;
- Objectively Assessed Needs (OAN) for development;
- Green Belt Assessment; and
- Spatial Distribution of Development and selection of sites.

2.4 The Inspector's views on the areas of concern can be summarised as follows:

- The economic strategy is unduly pessimistic, including the assumptions about economic growth and jobs growth, and does not seem to fully reflect the proposals and initiatives of other agencies and the extent of the site allocations proposed in the submitted plan;

- There is a serious mismatch between the economic strategy and the housing strategy of the submitted plan, particularly in the relationship between the proposed level of jobs and the amount of new housing;
- There are shortcomings in the Council's approach to the OAN for housing, both in terms of establishing an appropriate baseline figure and failing to specifically take into account and quantify all relevant economic and housing factors, including market signals and the need for affordable housing;
- The proposed level of future housing provision seems inadequate to ensure the success of the overall economic, employment and housing strategy;
- The proposed settlement hierarchy seems to be justified, effective and soundly based, but further work is needed to justify the spatial distribution of development, including addressing the development needs of the settlements in the north of the Borough;
- The process and evidence relating to the proposed amendments to the Green Belt boundary in the north of the district seems flawed, particularly the release of sites from the Green Belt and the provision of safeguarded land, and there seems to be insufficient justification for establishing a Green Belt in the south of the Borough.

2.5 The Inspector indicated that additional provision (above that proposed in the submitted Plan) should be made for new development, particularly housing, given the authority's growth ambitions and the growth potential of the Plan area especially taking account of demographic and economic factors. He suggested that more development should be provided for around the northern towns in the Borough (potentially taking more land out of the Green Belt) and was not minded to conclude that a new area of Green Belt could be justified

in the Crewe/Nantwich area. However, he was satisfied that the proposed policy approach to settlement hierarchy (which in broad terms seeks to distribute proportionally more development to the larger towns) is appropriately framed, although he thought it was unclear how sites had been selected for development in the Plan and sought more explanation of the approach used.

2.6 In responding to the Inspector's comments, the Council commissioned additional work from a range of expert consultancies to strengthen the evidence base in the areas of concern highlighted by the Inspector. The additional work was commissioned to a planned timetable to allow early work on the employment projections and OAN to subsequently inform other studies, such as the spatial distribution of development and highways impacts etc.

2.7 The work programme was co-ordinated through a detailed work plan which followed the outline programme of work agreed with the Inspector. The overall work programme has been overseen by a Local Plan Task Force of three elected Members, chaired by the Portfolio Holder responsible for the Local Plan. The additional work commissioned by the Council is set out below (by reference to the additional work commissioned and the consultants retained by the Council to undertake that work):

Work Area	Consultants
Alignment of Economic, Employment and Housing Strategy	Ekosgen
Housing Development Study	Opinion Research Services
Green Belt Assessment Update	Ove Arup & Partners (Arup)
Spatial Distribution Update Report	AECOM

Sustainability Appraisal Addendum	Enfusion
Habitat Regulations Assessments Addendum	JBA Consultants
Strategic Highways Modelling	Atkins

2.8 From the outset of the suspension period, the Inspector stressed the importance of engagement with interested parties on the work being done by and on behalf of the Council to address the concerns raised in his Interim Views. This work has focused on the four main areas of concern voiced by the Inspector namely the alignment of housing and economic strategies, OAN for housing development, Green Belt Assessment and the Spatial Distribution of Development.

2.9 Stakeholder Engagement Workshops have been held with hearing session participants to consider: (1) the Council's approach to the additional work being undertaken; and (2) the outcome of that additional work. In addition and on request of participants at the Technical Workshop, a supplementary workshop was held which focused upon on employment distribution.

2.10 Furthermore, the Council has continued with its Duty to Co-operate discussions during the gathering and completion of additional evidence to ensure proper account is taken of any relevant cross-boundary strategic issues relevant to the Council's additional work, or consequent upon the outcome of that work.

2.11 Complementary work has also been done on revisiting the sustainability appraisal, habitats assessment, transport modelling and infrastructure planning. Monthly updates on the work have been sent to the Inspector who appears to have been satisfied with the progress

made. As part of this monthly exchange of correspondence, the Inspector has identified changes in national policy and guidance that have been published during the suspension period, that the Council should consider as part of its additional work and, where appropriate, should be addressed by making such changes to the submitted LPS as may be necessary.

- 2.12 The additional work undertaken by the Council during the suspension of the LPS Examination has produced two main outcomes, namely: an additional and updated body of evidence; and the Council's suggested revisions to the submitted LPS.

3. SUMMARY OF ADDITIONAL WORK

- 3.1 The following sections outline in broad terms the approach taken to the work undertaken during the Examination suspension, the additional evidence which has been produced and the implications for the submitted LPS. It will consider the main work stream elements in turn:

- Alignment of Economic, Employment and Housing Strategy
- The Housing Development Study
- The Green Belt Assessment Update
- Spatial Distribution Update
- Other Additional Work including Site Specific Implications

ALIGNMENT OF ECONOMIC, EMPLOYMENT AND HOUSING STRATEGY

KEY POINTS SUMMARY

- Three sets of economic projections for Cheshire East over the Local Plan period 2010-2030 (two from the Cheshire and Warrington Econometric Model (CWEM) and one from Oxford Economics) have been compared.
- The preferred projection for Cheshire East is the ONS based CWEM which covers 2010-2025 results in the creation of 22,200 net additional jobs by 2025. When this growth rate is extended, the number of net additional jobs increases to 31,400 by 2030 (0.7% jobs growth rate).
- The revised economic projection numbers are consistent with the ambition and employment growth targets set out in the Economic Development Strategy for Cheshire East and the LEP Strategic Economic Plan for Cheshire and Warrington.
- Taking on the ONS based CWEM projections and assumptions on the additional employment that will be created on site in B1, B2 and B8 accommodation, it is estimated that the gross land requirement increases to 378 hectares between 2010 and 2030. This is higher than the expected level of development identified by the LPS Submission Version (300-351 hectares).
- While it is likely that both the north and south of Cheshire East will benefit from this growth, the north will continue to be attractive to some businesses keen to be based in locations with easy access to Manchester city centre. As such there is a strong case, at a strategic level, to allocate a substantial proportion of any additional land to the north of the Borough.

The Council contends that the revisions made to Policy PG1 from 300 hectares to 380 hectares of land for B1, B2 and B8 uses (suggested revisions

log SR17) are:

- **Positively prepared**, in that Policy PG1 evidences the development needs for economic development in the Borough
- **Justified** by proportionate evidence within the Alignment of Economic, Employment and Housing Strategy Report (2015), which is robust, reliable and up-to-date;
- **Consistent with national policy** by setting out, through the development need for economic development delivering sustainable development in accordance with the NPPF and PPG.

3.2 The submitted LPS includes a strategy of growth that seeks to make the most of the areas economic potential. It recognises that the Borough has performed strongly in the past and enjoys a number of expanding economic sectors. There are also excellent local companies and a high quality environment that fosters high value employment. However this potential was tempered within the submitted LPS by background of recession and the knowledge that the current workforce was rapidly ageing – and that continued economic expansion was dependent on enhanced levels of in-migration. As a consequence the employment projections of the submitted LPS were set at lower level than in the past – albeit with elevated projection of Gross Value Added.

3.3 In his Interim Views the Inspector highlighted concerns that the LPS did not properly reflect the economic ambition or economic potential of a prosperous Borough such as Cheshire East. Accordingly he considered that the Plan's intention to provide for an increase of 0.4% pa in jobs, equating to estimated GVA growth of around 2.4% per annum to be "unduly pessimistic". As a consequence the Inspector concluded that the economic approach of the submitted plan "may not actually represent a sustainable and deliverable strategy for growth".

- 3.4 Economic consultants Ekosgen were commissioned to review the alignment of economic, employment and housing strategy taking account of the Inspector's concerns. The work comprised four main strands¹ of analysis that provide a rounded assessment of: (i) the level of potential growth, taking account of employment projections and economic development plans; and (ii) Cheshire East Borough ability to capture this based on the area's historic performance and the availability of employment land and the required infrastructure. The analysis highlighted the importance of much higher than average growth in public sector employment as a major contributor to employment growth in Cheshire East in previous growth phases; a factor that is not likely to continue in the future.
- 3.5 Three sets of economic projections for Cheshire East over the Local Plan period 2010-2030 - two from the Cheshire and Warrington Econometric Model (CWEM) and one from Oxford Economics - have been compared. The two CWEM projections - one based on national ONS data and one based on local data - produce the same average annual employment growth rate at both the sector and overall economy level for Cheshire East.
- 3.6 The preferred projection for Cheshire East is the ONS based CWEM which covers 2010-2025 results in the creation of 22,200 net additional jobs by 2025. When this growth rate is extended, the number of net additional jobs increases to 31,400 by 2030. The growth projected for the next 20 years in Cheshire East in the ONS based CWEM (i.e., 0.7% including self employment) falls within the range of employment

¹ Comprising of employment performance and analysis of historic data, economic potential and employment land requirements, alignment of LPS with strategic plans and economic ambitions and the spatial implications of future employment growth

growth rates recorded between 1998 and 2008 (i.e., 0.8% including self employment) and 2009 and 2013 (i.e., 0.6% including self employment).

- 3.7 A target of 38,600 net additional jobs and average annual employment growth rate of 0.9% was provided by Oxford Economics as a second economic forecast. After careful consideration by Ekosgen this forecast was regarded as overly optimistic, mainly on the basis of the need to secure an exceptionally high level of employment growth in financial, professional and business services (much higher than the forecast national growth rate). This level of growth was considered unlikely given that Manchester has ambitious plans to increase this type of employment based on a strong commercial office market in the city centre, the Oxford Road Corridor and Salford Quays, and significant transport investment in the Metrolink Second City Crossing and the Northern Hub rail improvements, increasing services to Manchester Piccadilly and Manchester Victoria stations.
- 3.8 Adopting the ONS-based CWEM projections and assumptions on the additional employment that will be created on site in accommodation within Use Classes B1, B2 and B8, it is estimated that there will be a net employment land requirement of 195 hectares between 2010 and 2030. When land losses are factored in and a 20% flexibility factor is applied, the gross land requirement increases to 378 hectares between 2010 and 2030. This equates to an annual requirement of 18.9 hectares which is higher than the expected level of development of 300 to 351 hectares identified in the submitted LPS.
- 3.9 The revised economic projection numbers are consistent with the ambition and employment growth targets set out in the Economic Development Strategy for Cheshire East and the LEP Strategic Economic Plan for Cheshire and Warrington. The constellation city

concept, which is based upon capitalising on connectivity advantages in the south of Cheshire East and capturing growth in the cluster of towns surrounding Crewe that strongly interact as a single integrated market area, is consistent with the proposed land allocations in the LPS Submission Version.

- 3.10 Overall, there is a sound rationale for the broad allocations of employment land to the south of Cheshire East given the importance and new opportunities around all of the ambitions for Crewe. The north of Cheshire East Borough will continue to be attractive for many employers, but the overall trend in the key drivers of employment growth are based on businesses which need to attract and have access to a young, educated workforce, favouring the major cities, such as Manchester, Leeds and Birmingham, possibly at the expense of their immediate neighbours.
- 3.11 While the proposals for 351 hectares of employment land may be sufficient to support the level of employment growth envisaged in the submitted LPS, the level of growth expected in the updated ONS based CWEM economic projections suggests 27 additional hectares of land will be required. A significant part of the increased employment from the updated model is for office based jobs.
- 3.12 While it is likely that both the north and south of Cheshire East will benefit from this growth, the north will continue to be attractive to some businesses keen to be based in locations with easy access to Manchester city centre. As such there is a strong case, at a strategic level, to allocate a substantial proportion of any additional land to the north of the Borough.
- 3.13 Ekosgen presented the methodology at the first technical workshop and received feedback from participants. Following a request made at

the workshop an additional interim economic workshop was held on the 24th April. The purpose of this meeting was to discuss views on the employment growth sectors relevant to Cheshire East and future employment land supply and the outcome of these discussions are reflected in the outcomes of the report. The second formal technical workshop considered the proposed outcomes of this workstream and informed the final content of the Ekosgen report.

HOUSING DEVELOPMENT STUDY

KEY POINTS SUMMARY

- The Housing Development Study concluded that the headline OAN for Housing in Cheshire East is 36,000 dwellings over the 20-year period 2010-30, equivalent to an average of 1,800 dwellings per annum. The housing requirement as set out in the suggested revisions for Policy PG1 (reference SR 17) is 36,000 dwellings over the 20-year period 2010-30
- ORS conclude that Cheshire East Council represents a single housing market area with recognition of two local sub-market areas
- The 'starting point' estimate for OAN has been the Department of Communities and Local Government (DCLG) 2012-based household projections. ORS have reviewed and assessed the household projections and used a scenario based on 10-year migration trend data.
- The OAN and Housing Requirement include an allowance for older person's accommodation which accounts for 2,185 units over the Plan Period. This figure incorporates accommodation for older people which may include facilities within Planning Use Class C2 as well as conventional dwellings (Use Class C3).
- The Housing Development Study has considered the Market Signals for Cheshire East and compared these to other areas which have

similar demographic and economic characteristics. The Study identified that, on the whole, market signals do not indicate any need for an upward adjustment although there has been an increase in concealed families over the period 2001 – 11 which the objective assessment of housing need has addressed

- The Housing Development Study identifies a total affordable housing need of a minimum of 7,100 dwellings (an average of 355 per annum), which is included in the derived OAN for housing of at least 36,000 dwellings.
- The Housing Development Study has considered employment trends and how the projected growth of the economically active population fits with the future changes in job numbers. The Study identified a potential range for the OAN from 1,466 dwellings per annum where all of the adjustment for additional workers falls on commuting, to 1,894 dwellings per annum where all of the adjustment falls on migration. On balance and following more detailed analysis regarding the balance and realism of migration and commuting patterns, the figure of 1,800 dwellings per annum is considered to be the viable OAN for Cheshire East.

The Council contends that the revisions made to Policy PG1 from 27,000 to 36,000 dwellings (suggested revisions log SR17) are:

- **Positively prepared**, in that PG1 sets out a Housing Requirement which meets the overall OAN for Housing in Cheshire East
- **Justified** by proportionate evidence within the Housing Development Study (2015) and Alignment of Economic, Employment and Housing Strategy Report (2015), which is robust, reliable and up-to-date;
- **Consistent with national policy** by setting out a housing requirement which is consistent with national policy by fully meeting

the Objective Assessment of Housing Need identified for Cheshire East

3.14 In his Interim Views, the Inspector identified shortcomings with the Council's original calculation of OAN and of the overall housing requirement. These concerns related to:

- The failure to establish an appropriate **baseline figure** for objectively assessing housing need ([PS A017b], paragraph 4);
- The assumptions made by the Council about household formation rates, migration and economic activity rates:
- On **household formation**, the Inspector noted that "...CEC has assumed that household formation rates will stay constant after 2021...However, the PPG advises that household formation rates may have been suppressed historically by past under-supply and worsening affordability of housing...a partial return of household formation rates to longer term trends...could be considered...CEC has considered some alternative models which assume some growth in household formation after 2021; these may represent a more appropriate and robust basis on which to estimate future housing need" ([PS A017b], paragraphs 42-43).
- On **migration**, the Inspector commented that "...CEC uses short-term data for the period 2006/07 – 2009/10...By using figures from the last decade, the LPS is continuing the levels of migration associated with a period of economic recession and limited availability of new housing, rather than those associated with a more buoyant economy and more new housing" ([PS A017b], paragraph 44).

- On **economic activity rates**, he noted that “CEC has also made some unduly optimistic assumptions about increased economic activity of older people...Both the unduly pessimistic assumptions about job growth and the optimistic assumptions about future economic activity rates of older people have the effect of artificially depressing the need for new housing for employees. This is a high risk strategy which could result in the failure of the economic strategy of the plan at the expense of increased and less sustainable in-commuting” ([PS A017b], paragraph 50).
- Factoring in relevant evidence on **market signals and affordable housing**. The Inspector took the view that “There are shortcomings in the Council’s objective assessment of housing needs, both in terms of establishing an appropriate baseline figure and failing to specifically take into account and quantify all relevant economic and housing factors, including market signals and the need for affordable housing.” ([PSA017b], paragraph 4).
- **Economic and housing strategy**. The Inspector highlighted the need for economic strategy to be suitably ambitious, suitably aligned with the wider strategies of the Council and other agencies, and for housing provision to be sufficient to achieve this economic ambition. He noted that “The economic strategy is unduly pessimistic, including the assumptions about economic growth and jobs growth, and does not seem to fully reflect the proposals and initiatives of other agencies and the extent of site allocations proposed in the submitted plan. There is a serious mismatch between the economic strategy and the housing strategy of the submitted plan, particularly in the constrained relationship between the proposed level of jobs and the amount of new housing...The proposed level of future housing provision seems inadequate to ensure the success of the overall economic, employment and housing strategy.” ([PS A017b], paragraph 4) Overall, the Inspector concluded that further work needed to be undertaken to assess the

housing need for the area in a way which explicitly addressed all the relevant factors outlined in the NPPF and PPG, using assumptions that are robust and realistic, and which better reflect the inter-relationship with the plan's economic strategy.

- 3.15 The Council commissioned expert consultants, Opinion Research Services (ORS), to undertake a Housing Development Study (HDS) identifying the OAN for housing over the Plan period. The HDS was undertaken by ORS in full compliance with relevant policy and practice and guidance within the NPPF and PPG. In addition, the HDS takes account of recently published Local Plan Inspector examination reports and relevant legal authorities, together with emerging good practice, including the Technical Advice Note on OAN and Housing Targets published by the Planning Advisory Service (PAS).
- 3.16 The HDS concluded that the OAN for Housing in Cheshire East is 36,000 dwellings over the 20-year period 2010-30, equivalent to an average of 1,800 dwellings per annum (dpa).
- 3.17 The OAN figure includes an allowance for older person's accommodation and also takes account of all of the evidence in relation to demographic trends, market signals and economic development needs and also factors in considerations such as student accommodation, Gypsy and Traveller site provision, vacancies and second homes in the overall calculation.
- 3.18 ORS conclude in the HDS that Cheshire East Borough represents a single housing market area with recognition of two local sub-market areas – one in the north and the other in the south of the Borough.
- 3.19 ORS have used the 'starting point' estimate for OAN as the DCLG 2012-based household projections. They have reviewed and assessed

the household projections and used a scenario based on 10-year migration trends as they consider this to provide the most reliable and appropriate long-term demographic projection for establishing housing need.

- 3.20 The HDS considered appropriate market signals relevant to Cheshire East and compared these to other areas with similar demographic and economic characteristics. The market signals analysis compared Cheshire East to the areas of: Cheshire West & Chester; the East Riding of Yorkshire; Wiltshire; and North Somerset. Comparisons were also drawn against England as a whole.
- 3.21 Market signals considered by ORS included house prices, rents, affordability, rate of development and overcrowding. The HDS identified an increase in concealed families over the period 2001–11 which justifies an uplift in the OAN for housing. The OAN also includes an allowance for older person's accommodation which accounts for 2,185 units over the Plan period. This figure incorporates accommodation for older people which may include facilities within Use Class C2 as well as conventional dwellings (Use Class C3).
- 3.22 The HDS identifies a minimum total need for affordable housing of 7,100 dwellings (an average of 355 per annum) over the Plan period, which is included in the OAN for housing 36,000 dwellings. The HDS recognises the conclusions of the draft Core Strategy and CIL Viability Study, prepared in 2013, which identified that Greenfield residential development is generally viable with the Council's 30% affordable housing target, whereas brownfield residential development maybe viable if lower levels of affordable housing are permitted at planning application stage. On this basis, there is no reason to doubt the viability of delivering the affordable housing need identified

- 3.23 The key factors in the affordable housing calculation are the assessment of current unmet need for affordable housing and the projected need for future affordable housing in line with the requirements of the NPPF and PPG. The HDS notes the importance of properly considering the needs of newly forming against migrating households and also that different household groups have different propensities of forming in response of housing need. It is also the case that while some household fall in to need each year, other households will climb out of need at the same time and this needs to be fully factored in to any calculation of affordable housing need. The impact of addressing all of these factors is to reduce the affordable housing need calculated for Cheshire East from the figure previously reflected in the 2013 Arc⁴ SHMA Update [BE001]. It is also important to note that the 2013 SHMA Update was produced prior to the publication of the PPG web-based resource on 6 March 2014.
- 3.24 Taking account of the revised employment forecasts and the balance between workers and jobs, the population projection based on 10-year migration trends suggests that there is likely to be a shortfall of around 11,800 workers over the 20-year period between 2010 and 2030. An assessment therefore needs to be made as to the likely implications on both in-migration and on patterns of commuting.
- 3.25 An increase in jobs within the Borough has potential to attract migrants into the area from other parts of the UK, but also influence the working preferences of existing residents. As the quality and quantity of employment increases, so the need to seek work outside of the area may also diminish. Accordingly an adjustment in the proportion of out commuting can be anticipated as more residents find work locally. This should be expected as generally speaking it is easier to move jobs than it is to move house.

- 3.26 There are however limits to this trend, and so it is suggested that the adjustment to commuting - that net in-commuting would reach 9,000 by 2030 (less than 5% of the total projected jobs) – a consequence of fewer residents commuting out of the Borough to find work. The remaining shortfall in workforce must therefore be met by in-migration. This is assumed to be at a rate of 2,600 per year – the highest level recorded in any single year since 1991. It is considered this pushes the boundaries of what reasonably can be expected by way of an increase in migration. Should the commuting patterns not adjust in the way that is anticipated, then even higher levels of in-migration would be required to meet the shortfall in the workforce (some 2,797 per year based on 10-year migration trends). This level requires consistently high increases year on year, which is not thought to be credible. In turn it would also adjust the housing total accordingly (to 1,894 dpa).
- 3.27 There is thus a need to increase the OAN further to reflect the balance between future jobs and workers in particular. However, it is important to recognise that as well as yielding extra population and workers, any increase in housing will also respond to market signals and help provide affordable housing – so the increases identified are not cumulative, and providing the homes required to balance jobs and workers will help ease market pressure and enable more affordable housing to be delivered through the planning system.
- 3.28 Considering all of the evidence, the OAN for housing in Cheshire East is 36,000 dwellings over the 20-year period from 2010 to 2030; equivalent to an average of 1,800 dpa. This includes the OAN for affordable housing at a minimum of 7,100 dwellings over the same period; equivalent to an average of 355 dpa.
- 3.29 This is 23% higher than the identified housing need based on demographic projections using 10-year migration trends (incorporating

Class C2 usage and the response to market signals for concealed families); and an overall uplift of more than 65% from the DCLG starting point estimate. It also represents a 1.1% increase in the dwelling stock each year (equal to the average for England as a whole), a rate that is over 35% higher than that achieved on average over the period from 2001 to 2011 in Cheshire East.

3.30 This OAN for housing provides a clear response to market signals and contributes significantly to the likely shortfall of workers that has been identified, whilst recognising that there will also be changes to commuting patterns in the future that will need to be considered.

3.31 ORS presented the HDS methodology at the first Stakeholder Engagement Workshop and received feedback from participants. The second Stakeholder Engagement Workshop considered the outcomes of this workstream and the feedback from participants informed the final content of the HDS.

Housing Requirement

3.32 On the basis of the additional evidence within the HDS, specifically, the conclusion of ORS on the OAN for housing in Cheshire East over the Plan period, the Council considers the overall housing requirement over the Plan period should be 36,000 dwellings, which is identified in the Council's suggested revision to Policy PG1. A housing requirement of 36,000 dwellings will fully meet the OAN for housing in Cheshire East Borough, which accords with Strategic Priority 2 of the submitted LPS.

3.33 The Council recognises that delivering development to meet the housing requirement during the Plan period is ambitious but is considered to be achievable through delivery of development on the LPS Strategic Sites and Locations, the Site Allocations and Development Policies Local Plan document (SADPD), Neighbourhood

Plans and continued grants of planning permission granted for sustainable development.

3.34 In terms of meeting the updated housing requirement, since the base date of the submitted plan (31 December 2013), the Council has granted planning permission for sustainable forms of development in appropriate locations. When these are added to the sites / allocations already included in the submitted LPS, a total provision of 32,062 dwellings has already been identified as of 31 March 2015.

3.35 Annexe D includes further detailed considerations informing the identification of the overall housing requirement identified in the Council's suggested revisions to Policy PG1.

GREEN BELT ASSESSMENT

KEY POINTS SUMMARY

Green Belt Assessment Update

- The Green Belt Assessment Update 2015 (GBA Update) considered the five purposes which the Green Belt serves in two main stages: Stage 1 involved a General Area Assessment of the whole Green Belt in Cheshire East and is used to identify areas for further consideration in the second stage of assessment; and Stage 2 considered smaller parcels of land adjacent to the main settlements, as well as smaller settlements in general areas that were judged not to make a strong contribution to the Green Belt purposes at Stage 1. The results of the assessment will be used to inform decisions regarding land to release for potential development.
- The GBA Update defined a set of moderate and strong Green Belt defensible boundaries and defined parcels of land for assessment

by searching outwards from the Green Belt inset boundary to the nearest strong or moderate defensible boundary. For parcels located near administrative boundaries, this has meant that some assessment parcels have included areas of Green Belt in neighbouring authorities and has necessitated and resulted in consultation with adjacent Local Authorities.

- Overall, out of the 401 parcels identified for assessment, there are 84 parcels which have been assessed as making a 'contribution' to the purposes served by the Green Belt in Cheshire East. No parcels are assessed as making 'no contribution' to Green Belt purposes.
- The assessment shows parcels which make a lesser contribution to the purposes served by the Green Belt are clustered around Macclesfield and Wilmslow in the north of the Borough, and Scholar Green further south. However, it should be noted that the Green Belt Assessment only considers the five defined purposes of Green Belt and many of these parcels are otherwise unsuitable for development. For example, because they are within river valleys, are parcels of open space closely linked to the urban area, or are already covered by significant levels of development.
- The majority of parcels around Alderley Edge, Alsager, Bollington, Disley, Handforth, Mobberley, Poynton and Prestbury make either a 'significant' or 'major' contribution to the Green Belt in Cheshire East when assessed against the five purposes.
- It is also recommended that Green Belt inset boundaries be reviewed and updated in terms of their relationship with the existing urban form. This issue could be addressed through the SADPD.

Safeguarded Land

- For the purpose of the safeguarded land calculation, average

densities of 30, 35 and 40 dph have been assumed. This modest increase above the usual 30 dpa strikes a balance between the desire to increase densities (for the reasons set out above) and the requirement to ensure that Green Belt boundaries will not need to be altered again at the end of the Plan period.

- Taking all of these factors together a midpoint between the variables suggests a total of 200 hectares of safeguarded land need to be provided in the LPS. The Council does not propose to be any more definitive about the likely variables – to do so might render a calculation with a spurious level of fine-grained accuracy. Instead, it is suggested that a broader strategic view of the issue be taken. However, for the purposes of comparison, 200 hectares of safeguarded land equates to 9 years of safeguarding at an average density of 34 dph. The calculation and justification is set out in the Attached Technical Annexe.

New Green Belt / Green Gap

- The New Green Belt policy proposed in the submitted LPS will be replaced by an alternative “Strategic Green Gaps” policy which will cover the gaps currently included in the existing Green Gaps policy (saved Policy NE.4 in the Crewe and Nantwich Local Plan). These are identified as being the critical gaps to provide protection against coalescence, to protect the character and separate identity of settlements, and to retain the existing settlement pattern by maintaining the openness of land. The strategic gaps identified in this policy are considered necessary to prevent coalescence, primarily arising from the growth of Crewe.
- In addition to the “Strategic Green Gaps” policy, further consideration should be given to an additional “Local Green Gaps” policy in the SADPD.

- 3.36 The Green Belt Assessment Update 2015 (GBA Update) has been produced to address the Inspector's concerns identified in his Interim Views and to take account of national policy, guidance and best practice in carrying out Green Belt reviews. The Update consists of two main stages: Stage 1 is a General Area Assessment of the whole Green Belt in Cheshire East and is used to identify areas for further consideration in the second stage of assessment; and Stage 2 considered considers smaller parcels of land adjacent to the main settlements, as well as smaller settlements in general areas that were judged not to make a strong contribution to Green Belt purposes in Stage 1.
- 3.37 The GBA Update only considered the purposes served by the Green Belt in Cheshire East and the contribution that existing Green Belt land makes to the five purposes served by Green Belts identified in national policy (NPPF, ¶89). Land was judged to make 'No contribution', a 'Contribution', a 'Significant contribution' or a 'Major contribution' to Green Belt purposes following assessment against the five purposes. The Update does not consider any other planning considerations, such as sustainable development, flooding, accessibility, or infrastructure etc. As such, it does not make any recommendations as to the areas of land which should, or should not, be released from the Green Belt.
- 3.38 The results of the GBA Update will be used to inform decisions regarding the potential need to release existing Green Belt to accommodate new development during the Plan period. Those decisions will also need to consider other material planning consideration and evidence but, in Green Belt terms, the parcels identified as making 'a contribution' have the greatest potential to be considered for release due to their lower contribution to Green Belt purposes. Release of parcels assessed as making a significant or major contribution can also be considered but the weight of evidence

would need to be greater to demonstrate the required exceptional circumstances to justify its removal from the Green Belt.

- 3.39 The GBA Update defined a set of moderate and strong Green Belt defensible boundaries and defined parcels of land for assessment by searching outwards from the Green Belt inset boundary to the nearest strong or moderate defensible boundary. For parcels located near administrative boundaries, this has meant that some assessment parcels have included areas of Green Belt in neighbouring authorities. The definition of these parcels and the results of parcel assessments that include such land have been reviewed and agreed in consultation with the neighbouring authorities. A meeting was held with Stockport MBC in January 2015 to discuss concerns regarding the Green Belt Assessment 2013 and agree an approach for the GBA Update. This included reviewing parcels adjacent to Stockport's administrative boundary, with Stockport MBC.
- 3.40 In general terms the parcels identified as making a 'contribution' have the greatest potential to be considered for release due to their lower contribution to Green Belt function. Overall, out of the 401 parcels identified for assessment, there are 84 parcels which have been assessed as providing a 'contribution' to the Green Belt in Cheshire East. No parcels are assessed as making 'no contribution'.
- 3.41 The assessment shows parcels which make a lesser contribution to the Green Belt, due to being assessed as making a 'contribution' are clustered around Macclesfield and Wilmslow in the north of the district, and Scholar Green further south. However, it should be noted that the Green Belt Assessment only considers the five defined purposes of Green Belt and many of these parcels are otherwise unsuitable for development. For example, because they are within rivers valleys, are parcels of open space closely linked to the urban area, or are already

covered by significant levels of development. The majority of parcels around Alderley Edge, Alsager, Bollington, Disley, Handforth, Mobberley, Poynton and Prestbury make either a 'significant' or 'major' contribution to the Green Belt in Cheshire East when assessed against the five purposes.

3.42 Arup's detailed analysis of the Green Belt in Cheshire East raised a further issue regarding the relationship between the Green Belt boundary and settlements within the Borough. The Green Belt inset boundary does not reflect the urban form in a small number of cases, with development largely encroaching into the Green Belt or settlement cores being 'washed over' by the Green Belt.

3.43 Arup recommends that Green Belt inset boundaries are reviewed and updated in terms of their relationship with the existing urban form. This issue could be addressed through the preparation of the SADPD

Safeguarded Land

3.44 Safeguarded land is required so that the Council can be confident that Green Belt boundaries will not need to be altered again at the end of the Plan period in 2030. In calculating the requirement for Safeguarded Land, consideration has been given to the likely availability of other land beyond 2030. An advice note on methodology and approach has been prepared by Arup which recommends projecting forward current development requirements for a further period beyond 2030. This highlights that there are a number of influences on future needs.

3.45 First and foremost is the projection forward of current OAN. Although predicting needs beyond 2030 inevitably involves uncertainties, the rolling forward of current needs for homes and jobs provides a reasonable basis for future land calculations. Consideration has been given to other approaches such as attempting a bespoke calculation of

need for an additional 15 year Plan period (2030-45). However such an assessment would not have sufficient reliability to be truly trustworthy.

- 3.46 Secondly, the advice also suggests that future brownfield development be assessed. The urban potential study considers sites that have potential for development during the current Plan period. A large number of sites were considered to have potential for development, but were screened-out as they are currently in use and could not therefore be said to be available during the Plan period. These screened-out 'in use' sites could possibly provide more dwellings than those with potential in this Plan period, and may well come forward for development after 2030.
- 3.47 In the former Macclesfield Borough, 86.7% of dwelling completions since 2002 have been on non-allocated sites. This high figure is partly due to the lack of allocated housing sites and must be considered in the context of a fairly low level of house building. However, it does demonstrate that, despite the tightly-drawn Green Belt boundary, there is a reliable source of recycled and other land coming forward for development.
- 3.48 Careful consideration has been given to the time period over which to project development requirements post-2030 in the calculation of the amount of safeguarded land. A number of local authorities have indicated that a 15 year Plan period, followed by 5-10 years' worth of Safeguarded Land should ensure that the Green Belt boundary retains a degree of permanence. In reducing the period of safeguarded land, it would be necessary to demonstrate the likely availability of land from other sources.
- 3.49 As demonstrated above, there will be a continued source of land beyond 2030 and there may also be other options to meet

development needs in other areas. Consequently, and bearing in mind the desire to protect the countryside and minimise the impact on the Green Belt, it is considered appropriate to contemplate providing Safeguarded Land of slightly less than 10 years duration.

- 3.50 Conversely, given the difficulties in assessing land supply so far into the future, it is considered that 5 years' worth of Safeguarded Land would be insufficient to give confidence that Green Belt boundaries will not need to be altered again at the end of the Plan period. Accordingly scenarios of 10, 9 and 8 years have been tested in the calculation – the latter two of which assume a slightly higher level of urban recycling.
- 3.51 Finally an assessment of density has been made. In its approach to the Strategic Housing Land Availability Assessment and LPS sites, the Council has used a cautious approach of assuming an average density of 30 dwellings per hectare, unless site-specific information indicates otherwise.
- 3.52 There is no national guidance on the application of densities and the 30 dwellings per hectare figure usually employed represents the very lowest end of the range of 30 – 50 dwellings per hectare previously advocated in planning policy under the old Planning Policy Statement 3.
- 3.53 The National Planning Policy Framework allows local planning authorities to set out their own approach to housing density to reflect local circumstances. It will be appropriate to consider the introduction of a housing density policy through the SADPD.
- 3.54 There is a growing recognition of the benefits of higher-density developments, particularly given the national challenge in significantly

boosting the supply of new housing, whilst protecting the countryside and making the best use of land.

3.55 Higher density housing can:

- Make better use of scarce land resources;
- Make more efficient use of existing infrastructure;
- Reduce the need for travel by providing local amenities; and
- Reduce the reliance on car transport by providing a focus for walking, cycling and public transport networks.

3.56 In the future, there will also be an increasing balance to be struck between provision of conventional, and other forms of housing which are often provided at higher densities. An ageing population and reducing average household size also means a likely future requirement for smaller units, built at higher densities.

3.57 When considered against the desire to protect the countryside, and to minimise the impact on the Green Belt, it is considered to be appropriate to assume a slightly higher density in converting potential future development requirements into a safeguarded land requirement.

3.58 For the purpose of the safeguarded land calculation, average densities of 30, 35 and 40 dwellings per hectare have been assumed. This modest increase above the usual 30 dwellings per hectare strikes a balance between the desire to increase densities (for the reasons set out above) and the requirement to ensure that Green Belt boundaries will not need to be altered again at the end of the Plan period.

3.59 Taking all of these factors together a mid point between the variables suggests a total of 200 hectares of safeguarded land need to be

provided in the Plan. It is not proposed that the Council be any more definitive about the likely variables – for to do so might render a calculation with a spurious level of fine gained accuracy. Instead it is suggested that a broader strategic view of the issue be taken. However, for the purposes of comparison, 200 ha of safeguarded land equates to 9 years of safeguarding at an average density of 34 homes per hectare. The calculation and justification is set out in the Attached Technical Annex.

New Green Belt and Green Gap

- 3.60 The Arup advice note “New Green Belt Policy” sets out the concerns raised by the Inspector in relation to the proposed new Green Belt policy. The Inspector found there was insufficient justification within the submitted LPS to establish a new Green Belt around Crewe.
- 3.61 Based on the outcomes of recent High Court and Appeal decisions, the Arup advisory note has concluded that the existing Green Gaps policy cannot currently be considered ‘insufficient’. In addition, the current evidence does not satisfy the Inspector that there are exceptional circumstances for a new Green Belt. The advice note recommends that the LPS considers a new Green Gaps policy rather than proceeding with the new Green Belt designation.
- 3.62 The evidence in the ‘New Green Belt and Strategic Open Gap Study (2013)’ is sufficient to justify a new Green Gaps policy. This study also makes an assessment of various gaps within the current Green Gap areas and beyond. The Arup note recommends that this evidence be reviewed and updated to define critical and less critical gaps in order to refine the policy response to ensure a consistent approach to protection within Green Gaps.

3.63 A review of the 2013 study shows that there is sufficient evidence to justify a strategic open gap policy within the following locations (all currently in the existing Green Gap:

- (A) Willaston / Wistaston / Nantwich / Crewe;
- (B) Willaston / Rope / Shavington / Crewe;
- (C) Crewe / Shavington / Basford village / Weston; and
- (D) Crewe / Haslington.

3.64 It also recommends consideration of a strategic open gap between Hough and Wybunbury (G), Sandbach and Middlewich (J), between Leighton and Bradfield Green (F) and between Shavington, Wybunbury and Hough (G). However, a review of the study shows that some additional assessment of these gaps would be required to justify their inclusion in a strategic open gap policy.

3.65 It is considered that a Strategic Green Gap policy should have the core objective of maintaining the physical gaps between Crewe, Willaston, Wistaston, Nantwich, Haslington and Shavington to prevent the settlements from merging with each other.

3.66 It may be appropriate to consider a further local gaps policy through the Site Allocations and Development Policies document to deal with less critical gaps. This local gaps policy would be more restrictive than the open countryside policy but less restrictive than the strategic gaps policy in the LPS.

3.67 As there is insufficient evidence at this stage to define a detailed boundary, it will be necessary to save the extent of the existing Green Gap. It is proposed to save the existing Green Gap policy (Policy NE.4,

CNBC Local Plan 2005) and its detailed boundary alongside the new policy until detail boundaries are defined on the Adopted Policies Map.

SPATIAL DISTRIBUTION WORKSTREAM

KEY POINTS SUMMARY

- The Spatial Distribution report has not sought to explore options regarding the re-categorisation of different settlements at different levels of the hierarchy from those that are set out in Policy PG2 (settlement hierarchy) given the Inspector's Interim Views
- Based upon the analysis of key factors and new evidence base (for housing, employment, Green Belt, highways, SA/HRA and an updated analysis of sites capacity of the Principal Towns, Key Service Centres and Local Service Centres), the study found that the approach employed in PG6 to be broadly justified based in the context of the previous housing figure contained in Appendix A of the LPS (29,050 dwellings) and set against the constraints and opportunities subject to analysis. The main exception to this (at the higher tiers of the Settlement Hierarchy) was that Poynton, Knutsford and Wilmslow where the evidence suggests more housing growth should have been allocated.
- In the context of OAN for housing and employment needs being higher, the AECOM report identified 5 options for initial Sustainability Appraisal testing, which resulted in a preferred option (option 6: recommended approach), The recommended option directs the bulk of the additional 27 hectares of additional employment floorspace required into the north; and the additional 6950 dwellings required to meet OAN for housing is directed mainly to settlements with greatest capacity to grow sustainably over the Plan period, with opportunities in the north maximised based upon evidence on constraints/capacity.

The Council contends that the suggested revisions made to LPS Policy PG6 (suggested revisions log SR73) are:

- **Positively prepared**, in that it sets out a Spatial Distribution which meets the overall OAN for Housing and employment in Cheshire East
- **Justified** by proportionate evidence within the HDS (2015), GBA Update (2015) and Alignment of Economic, Employment and Housing Strategy Report (2015), which is robust, reliable and up-to-date;
- **Consistent with national policy** by setting out, an evidenced base appraisal for the Spatial Distribution of development to meet sustainable development in accordance with the NPPF and PPG.

3.68 AECOM have been commissioned to assist the Council in considering the methodology and factors used to determine the spatial distribution of development, in the light of the Inspector's Interim Views. This commission sits alongside and has been informed by the outcomes of the other work streams.

3.69 Policy PG6 of the LPS sets out the Spatial Distribution of development in relation to the Principal Towns, Key Service Centres, Local Service Centres, Other Settlements and Rural Areas. Given the Inspector's initial conclusion that the settlement hierarchy is justified, effective and soundly based, this review work has not sought to explore options regarding the re-categorisation of different settlements at different levels of the hierarchy from those that are set out in Policy PG2.

3.70 Based upon the analysis of key factors and new evidence base (for housing, employment, Green Belt, highways, SA/HRA and an updated analysis of sites capacity of the Principal Towns, Key Service Centres and Local Service Centres), the study found that the approach

employed in PG6 to be broadly justified based in the context of the previous housing figure contained in Appendix A of the LPS (29,050 dwellings) and set against the constraints and opportunities subject to analysis. The main exception to this (at the higher tiers of the Settlement Hierarchy) was that Poynton, Knutsford and Wilmslow where the evidence suggests more housing growth should have been allocated.

3.71 The study was prepared during the period where evidence was emerging. In the context of OAN for housing and employment needs being higher, the AECOM report shows that there would be justification in exploring options that increase housing and employment floorspace over and above the base level of Policy PG6.

3.72 The consultants identified five options considered as reasonable alternatives for Sustainability Appraisal, as follows:

- Policy PG 6 with proportionate growth – applies a growth factor of 23% (the uplift in housing numbers identified in the ORS work) to the original housing numbers proposed in Policy PG6. Employment provision is uplifted by 27 hectares;
- Policy PG 6 with proportionate growth from 2010 – using Census 2011 data, distributing the additional housing growth based on the proportion of dwellings in each settlement. The additional 27 hectares of employment land are distributed to the Science and Growth corridor;
- Economic Strategy Led – distributing additional housing / employment growth using key economic drivers such as High Growth City, the Strategic Economic Plan (SEP) Constellation City Concept and Northern Science Corridor Foci;
- Constraints / Impact Led – approach seeks to limit the impacts of development on settlements which are sensitive to change

due to key constraints such as Green Belt and Highways impacts;

- Hybrid – a balanced approach would seek to meet the needs of the Borough, where they arise. However, there is a need to factor in constraints, opportunities and economic aspirations. This option is a blend of option 2 (proportionate growth), option 3 (economic strategy-led) and option 4 (constraints-led option).

3.73 Following the consideration of the outputs from initial Sustainability Appraisal / Habitats Regulations Assessment testing and the consideration of other evidence; AECOM proposed a preferred option 6 (Recommended Approach). The preferred option directs the bulk of the additional 27 hectares of additional employment floorspace required into the north; and the additional 6950 dwellings required to meet OAN for housing is directed mainly to settlements with greatest capacity to grow sustainably over the Plan period, with opportunities in the north maximised based upon evidence on constraints/capacity.

3.74 In summary the recommended option to the Council:

- seeks to address the development needs (for housing and employment) and opportunities at all the towns and settlements, particularly those in the north of the Borough.
- as a means of promoting sustainable patterns of development it directs increased housing growth to the Green Belt settlements of Poynton, Knutsford and Wilmslow alongside the bulk of the additional 27 hectares of employment land required to meet employment needs.

3.75 This option reflects further work conducted by officers to examine smaller sites within the built-up area or on the edges of settlements and adequately reflects existing commitments and proposals.

3.76 AECOM presented their methodology for deriving the Spatial Distribution at the second stakeholder workshops. At the engagement workshop, participants were asked for their views on receiving some form of engagement on spatial distribution options. There was naturally a desire from participants for further engagement on this matter specifically to be held in a similar workshop environment. The Council was mindful that the final distribution of development inevitably involves elements of judgement – and that there are many permutations that could be conceived, which is not necessarily conducive to the reaching of a rapid consensus. The Council in its response to the Inspector's comments on 3rd July 2015 [PS E026] agreed to hold a further technical workshop with examination participants which will consider the Council's proposals for revisions to the Spatial Distribution of Development. The results of the engagement events will be reported to you before the resumption of the examination hearings, together with any consequential alternations to the Council's suggested revisions.

HIGHWAYS WORKSTREAM

KEY POINTS SUMMARY

- The additional supporting highways evidence on Crewe and Alsager has been used to inform the Spatial Distribution in these areas.
- The A34 Study has concluded that, irrespective of the location; the impact on key highway junctions was broadly the same. Now that the demand for additional development in the North of the Borough has been determined, additional work is underway to quantify the impact of this growth over the Local Plan period.

3.77 The four main workstreams are also underpinned by additional supporting evidence on highways and infrastructure. There are three main documents (Appendix 6):

- A34 Corridor Study – highway Impacts
- Crewe Highway study
- Alsager Highway study

3.78 The Crewe and Alsager documents provide detailed analysis of the highway network in each town. They have been employed to inform the spatial distribution in these areas.

3.79 The work in the north of the Borough was designed to test sensitivity of the highway network on the Greater Manchester boundary to different scales and locations of development. To make this assessment a simple assumption had to be made of the possible scale of future development – recognising that the finalised figure might ultimately be higher or lower.

3.80 This work was undertaken with an assumed level of development in the North of the Borough (10,400). This development was then distributed across a range of different sites. The work concluded that, irrespective of the location; the impact on key highway junctions was broadly the same. Now that the demand for additional development in the North of the Borough has been determined, additional work is underway to quantify the impact of this growth over the Local Plan period.

4 OTHER ADDITIONAL WORK

KEY POINTS SUMMARY

Sustainability Appraisal

- An Addendum Report on the Planning for Growth Chapter / Policies has been prepared to clearly set out the method and findings of any further SA work carried out during the suspension of the LPS Examination.
- Strategic Options for Growth and Spatial Distribution have been subject to fresh SA and the draft suggested revisions to Policies have been screened for their significance with regard to SA.
- The suggested inclusion of Policy PG4a (Strategic Green Gaps) has also been subject to SA

Habitats Regulations Assessment

- A report has been prepared to consider the interim outcomes of the draft suggested revisions to the Planning for Growth Chapter / Policies in the light of the revised evidence to be submitted to the Inspector at the end of July. The report is not a full HRA but is rather an appraisal/screening exercise to identify the likely impacts of the suggested revisions upon European designated sites and whether any of the suggested revisions would be inherently undeliverable due to potential significant adverse impacts.
- The screening report indicates that the suggested revisions to the Planning for Growth chapter/policies are unlikely to result in any significant effects on European sites not already identified and assessed during the HRA process of the LPS to date.
- Any additional sites, or revisions to existing proposed sites, required

to meet the increased growth, particularly around Knutsford, will need to be screened with regards to potential impacts on European sites.

Duty to Co-operate

- Throughout the period that the LPS examination has been suspended there has been extensive engagement with neighbouring local authorities. The aim of this work has been to keep authorities informed of the evidence work, to seek their comments on it and in respect of the Green Belt Assessment Update to receive data inputs to inform the work. Ultimately the intention has been, wherever possible, to take in to account any changed cross-boundary strategic impacts
- It is intended to reproduce copies of all key correspondence with neighbouring authorities in an updated Duty to Co-operate engagement report.

Urban Potential / Edge of Settlement Assessment

- This work has been carried out in two stages: the first stage being the 'urban potential' assessment and the second stage being the assessment of land that lies immediately adjacent to the settlement boundaries/Green Belt boundaries of these settlements, to assess potential opportunities to release further sites for development, if required.
- There is an urban potential for 1,965 dwellings across the Borough, of which 563 dwellings were on greenfield sites and 1,402 were on brownfield sites. Sites assessed as not having the potential to deliver dwellings on them in the Plan period total 5,132 dwellings. Although these sites are not currently considered to have potential for development in the Plan period, it is possible that, due to changes in circumstances, some of these sites may come forward for development before 2030.

- The edge of settlement assessment showed that land is being actively promoted that could potentially accommodate 38,945 dwellings that is suitable for further consideration as land to be potentially identified as additional Strategic Sites or allocated during the Site Allocations process, where additional land is required. Of these sites, the majority (38,310) are located on greenfield sites, with the minority (635) on brownfield sites. Almost a third is located in Crewe and Macclesfield (14,971 in total).

Approach to Sites

- The Council is well placed to translate the uplift in housing and employment land into deliverable developments. The work undertaken so far demonstrates that additional land can be identified to meet the updated need for homes and jobs. Furthermore there are a number of mechanisms by which the strategic requirements can be promptly and effectively implemented on the ground through the LPS, SADPD and Neighbourhood Planning

Sustainability Appraisal

- 4.1 The Council has undertaken Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA) since 2009 to inform the preparation of the LPS.
- 4.2 Following the Inspector's decision to suspend the LPS Examination, the Council commissioned expert consultants, Enfusion Limited, to provide specialist, independent services and undertake the necessary SA work in respect of the additional evidence and suggested revisions to the submitted LPS.
- 4.3 An Addendum SA Report has been prepared that clearly sets out the method and findings of the further SA work undertaken during the

suspension of the LPS Examination. The Report includes the interim outcomes of the draft suggested revisions to the Planning for Growth Chapter / Policies in the light of the revised evidence to be submitted to the Inspector at the end of July.

- 4.4 The Addendum SA Report provides the history of strategic options and alternatives considered and appraised to inform the preparation of the LPS in order to provide clarification. Strategic Options for Growth and Spatial Distribution have been subject to fresh SA and the draft suggested revisions to Policies have been screened for their significance with regard to SA. Two revisions – PG1 and PG4a – were considered significant and were subject to refreshed SA. Other suggested revisions were considered to be minor amendments and do not significantly change the findings of the previous SA work.

Habitats Regulation Assessment

- 4.5 JBA consultants have supported the Council in undertaking Habitats Regulations Assessment (HRA) at various stages in the preparation of the LPS. Their work identifies, describes and assesses the likely significant effects of implementing the strategy and policies on European designated sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, and also any candidate SACs and potential SPAs) within and around Cheshire East Borough.
- 4.6 A report has been prepared to consider the interim outcomes of the draft suggested revisions to the Planning for Growth Chapter / Policies in the light of the revised evidence to be submitted to the Inspector at the end of July. The report is not a full HRA but, rather, is an appraisal/screening exercise to identify the likely impacts of the suggested revisions upon European designated sites and whether any of the suggested revisions would be inherently undeliverable due to potential significant adverse impacts.

- 4.7 The screening report indicates that the suggested revisions to the Planning for Growth chapter/policies are unlikely to result in any significant effects on European sites not already identified and assessed during the HRA process of the LPS to date.
- 4.8 Increased housing and employment provision (as detailed in revised Policy PG1) is unlikely to result in any additional impacts on European sites; however the magnitude and significance of identified impacts could potentially differ depending on how this increase is distributed.
- 4.9 Suggested spatial distribution options (strategic options) that proposed increased growth for those settlements located in close proximity to European sites (e.g. Crewe, Alsager, Nantwich and Knutsford) were assessed as having the potential for the greatest impact. Taking this into account, along with other appraisals and evidence, a further strategic option (Option 6: Recommended approach) was put forward and accepted by the Council as the basis to inform the suggested revisions to the LPS.
- 4.10 Revised Policy PG6 sets out the indicative spatial distribution of development (based on strategic option 6). All settlements would see an increased provision of housing with particular growth in the northern settlements of Macclesfield, Poynton, Handforth, Wilmslow and Knutsford. Increased growth around Knutsford could increase the likelihood of significant adverse effects occurring on Midland Meres and Mosses Phase 1 Ramsar and Rostherne Mere Ramsar.
- 4.11 The LPS contains policies/statements to ensure that strategic sites identified as having the potential to impact on European sites will not be developed without further assessment including HRA, and will only

be developed where it can be demonstrated that there is no adverse impact on a European site.

- 4.12 Any additional sites, or revisions to existing proposed sites, required to meet the increased growth, particularly around Knutsford, will need to be screened with regards to potential impacts on European sites. For those sites that are identified as having the potential to impact on European sites the statements as described above will need to be included within the suggested revisions.

Duty to Co-operate

Introduction

- 4.13 Throughout the period that the LPS examination has been suspended there has been extensive engagement with neighbouring local authorities. The aim of this work has been to keep authorities informed of the evidence work, to seek their comments on it and in respect of the Green Belt Assessment Update to receive data inputs to inform the work. Ultimately the intention has been, wherever possible, to take in to account any changed cross-boundary strategic impacts arising from the new evidence.

Green Belt Assessment Update

- 4.14 In terms of the Green Belt evidence work neighbouring authorities were informed early in the suspension period of the intended methodology to be used. Some constructive comments were made and the approach to the work was refined as a result. Neighbouring authorities were asked for housing land availability data in respect of places just outside of the LPS plan area. This information was sought to help with the assessment of land parcels near the plan area boundary in terms of how they contributed to the urban regeneration purpose of the Green Belt.

- 4.15 Neighbouring authorities have also been consulted on the draft findings and again some changes have been made in the finalised published documents. The extent of the engagement work and its influence on the outcomes is set out in full in the Green Belt Assessment Update report.

Engagement on the overall evidence work streams

- 4.16 Two rounds of workshops have been held on the main evidence work streams with relevant examination hearing participants and housing market partnership members. Of the neighbouring authorities only Stockport Council are hearing participants on the subject matters of these workshops and did take part in them.
- 4.17 The first set of workshops were held to discuss the proposed approach methodologies of the work streams and to consider the draft outcomes of the work. At around the same time (March –April 2015), an initial round of meetings were held with all immediate neighbouring planning authorities, including Stockport. These proved to be useful awareness raising opportunities not just for neighbouring authorities to be kept up to date with the LPS evidence gathering but also for Cheshire East Officers to be informed of the plan making progress in the other authorities.
- 4.18 A second round of meetings was held in May – June 2015, timed to coincide with the publication of the draft evidence reports that were the subject matters of the hearing participant workshops. The local authority contacts were pointed to the website location of the draft evidence reports prior to the meetings being held. Thorough discussions took place at the meetings particularly about the underlying justification for and the scale of development growth emerging from the evidence base.

Specific engagement with neighbouring authorities

- 4.19 In addition to the broadly based neighbouring authority meetings Cheshire East officers have been engaged in specific discussions with Stockport Council on transportation matters, particularly highways modelling work in relation to development site distribution options for the Cheshire East LPS and cross boundary road schemes.
- 4.20 The timing of the examination of the High Peak Local Plan has overlapped with that of the Cheshire East Plan. The High Peak Inspector requested further evidence on development requirements to take account of the release of the 2012-based sub national household projections in March this year. In view of this and the higher growth envisaged in Cheshire East the Council has corresponded with High Peak Borough Council on the future reliance of the latter authority on the 500 dwelling housing contribution in the LPS.
- 4.21 The outcome of the further evidence work done on behalf of High Peak Borough Council reveals a proposed lower housing requirement. On this basis there would be no need for the 500 dwelling contribution. This has been confirmed in a letter from High Peak Borough Council but it is a proposal subject to consultation and subsequent consideration by the examining Inspector. If it is confirmed, the clauses in the Memorandum of Understanding between the two authorities referring to the contribution will need to be removed.

Potential impact of growth in Cheshire East on neighbouring local authority areas

- 4.22 At around the time of the second meetings with local councils, correspondence was received from authorities within the Liverpool City Region – Halton Borough and St Helens Metropolitan Borough Councils. These authorities' areas do not adjoin the LPS plan area but they are part of the Mid-Mersey Housing Market Area along with

Warrington Borough Council whose area does adjoin Cheshire East Council's.

- 4.23 A Council Officer subsequently attended a Mid-Mersey Strategic Housing Market Assessment event and sought to explain the migration and commuting assumptions behind the Cheshire East evidence work.
- 4.24 It was nevertheless decided to hold a joint liaison meeting to which all neighbouring authorities, including St Helens Metropolitan Borough Council and Halton Borough Council, were invited. Prior to the meeting (held on 26 June) a comprehensive paper was produced setting out the modelled migration effects on each neighbouring authority area and a series of possible commuting scenarios.
- 4.25 Most authorities could be represented at the joint liaison meeting although two were unfortunately unable to attend due to the closure of the M6 motorway on the afternoon of the meeting. The meeting comprised of presentations by consultants Ekosgen and ORS on their economic, employment and housing evidence work and a presentation on the migration assumptions and commuting scenarios paper.
- 4.26 Opportunities to ask questions were given after each presentation and numerous points were raised. There was then a full and frank discussion on what the effects development growth, additional to that assumed in the submitted LPS, might be on adjoining areas and neighbouring authorities' plans.
- 4.27 Following the meeting a letter was sent to all neighbouring authorities including Halton Borough Council and St Helens Metropolitan Borough Council. This asked for written views on the Cheshire East evidence work, formal confirmation that neighbouring authorities could not accommodate any of Cheshire East's development requirements and

the Councils were also invited to set out any cross boundary strategic concerns. Responses were requested by 10 July 2015 so that these could be incorporated into this report.

- 4.28 The response received from the Greater Manchester Combined Authority highlights the need for full alignment of the Cheshire East Local Plan Strategy and the emerging Greater Manchester Spatial Framework. In particular the issue of cross boundary infrastructure is of special concern – and the need for ongoing discussion is emphasised, especially once the proposed distribution of development is confirmed. The Combined Authority also state that they cannot accommodate any development from Cheshire East at the present time.
- 4.29 A similar theme emerges from Staffordshire County Council, who also highlight the potential pressure that additional growth may place on cross boundary infrastructure. Once again the exact location of future development will further affect the individual impacts involved. Staffordshire raise the likely rise in employment in the borough and changes in commuting patterns (albeit that proportionately less out commuting is predicted). Once again further discussion is invited.
- 4.30 These comments highlight the importance of appropriate infrastructure to accompany new development. However they also pose a potential challenge – in that both northern and southern neighbours are hinting that a distribution of development away from their borders is to be preferred. This illustrates that planning for additional homes and employment is not without its repercussions.
- 4.31 It is acknowledged that only a limited time was being offered for a reply to the Council's letter and so further responses are anticipated. Also the neighbouring authorities were being asked for their views without a complete knowledge of the finalised evidence and what the suggested revisions to the LPS would comprise. This is reflected within some of the responses – which underline the need to understand the full

picture. In the light of this the Council is committed to continuing engagement with neighbouring authorities and to support any requests made by them to the Inspector to be participants at the resumed examination hearing.

Conclusion – Duty to Co-operate

- 4.32 Comprehensive notes were taken of all the meetings held. It is intended to reproduce these in full along with copies of key correspondence with neighbouring authorities in an updated Duty to Co-operate engagement report to be provided prior to the re-opening of any examination hearings.

Urban Potential / Edge of Settlement Assessment

- 4.33 In his Interim Views the Inspector expressed concerns about a number of other matters, these included:

- At paragraph 61: "...further clarification may be needed on this matter, particularly about the scale of brownfield development likely to be delivered from site allocations within the existing built-up areas of towns like Crewe, Macclesfield and Middlewich."
- At paragraph 76 (specifically in relation to Poynton, Knutsford and Wilmslow): "Many potential sites were assessed during the preparation of the LPS but specific options which envisage the development of smaller sites within the built-up area or on the fringes of these settlements do not seem to have been fully considered."
- At paragraph 78: "...such work may need to examine the possibility of releasing smaller scale sites in and around the fringes of existing towns and settlements, including those in the Green Belt, to inform further work at Site Allocations stage."

- 4.34 In relation to Green Belt, the Inspector identifies a number of concerns, with regard to the Green Belt Assessment [BE012] which resulted in the production of the Green Belt Assessment Update 2015. As part of that work, it is essential to have evidence regarding the brownfield potential for development within settlements that are located within the Green Belt.
- 4.35 To address the points raised by the Inspector, an assessment has therefore been carried out of the 'Urban Potential' of the Principal Towns; Key Service Centres and Local Service Centres. This feeds into the Green Belt Assessment Update 2015 ("the GBA Update") and also into the assessment of opportunities for development within settlements ("the Urban Potential Assessment") which, in turn, has informed the Spatial Distribution of development work and Site Selection work, for both the LPS and the SADPD.
- 4.36 An assessment has also been carried out of land that lies immediately adjacent to the settlement boundaries/Green Belt boundaries of these settlements ("the Edge of Settlement Assessment"), that has previously been considered in Town Strategies; as Non-Preferred sites, or as 'sites submitted as representations in response to the publication of the LPS Submission Version ('Omission' sites). In addition, two large, 'free standing' sites have been included in this stage, namely: 'Cheshire Gateway', which is promoted for employment development; and Gorsty Hill, which is promoted for residential development. These sites have been submitted as Omission sites in representations to the LPS and are therefore being actively promoted for development within the Local Plan process. The sites are included to ensure that all reasonable alternatives are considered.
- 4.37 The assessment has identified potential opportunities to release land for future development, if required in the LPS and to inform future work

at Site Allocations stage. In turn this work has informed into the Site Selection process which will also be informed by the GBA Update.

4.38 The work to assess land that lies immediately adjacent to the settlement boundaries/Green Belt Boundaries of these settlements is a separate piece of work to the GBA Update. The assessments do not therefore include any references to the contribution that sites make to the Green Belt; this will be dealt with at the 'Site Selection'/Site Allocations stage.

4.39 This work has been carried out in two stages: the first stage being the Urban Potential Assessment; and the second stage being the Edge of Settlement Assessment, which investigated and assessed the potential opportunities to release additional sites for development, should it be required.

Urban Potential Assessment

4.40 There is an urban potential for 1,965 dwellings across the Borough, of which 563 dwellings were on greenfield sites and 1,402 were on brownfield sites. Sites assessed as not having the potential to deliver dwellings on them in the Plan period total 5,132 dwellings. Although these sites are not currently considered to have potential for development in the Plan period, it is possible that, due to changes in circumstances, some of these sites may come forward for development before 2030.

4.41 Almost half of the sites considered to have the potential for development in the Plan period are located in Crewe and Macclesfield (989), with most of those being on brownfield sites (919).

4.42 The Key Service Centres have sites with the potential for the development of 623 dwellings in the Plan period, with most of them being located in Congleton (252) and Sandbach (156).

- 4.43 The work shows that there are no opportunities to identify additional Strategic Sites/Strategic Locations within the urban areas of the Key Service Centres; it does however show that there are some opportunities for windfall sites to be delivered over the Plan period within the towns and in some cases, such as Congleton, there could be the opportunity to allocate sites within the urban area, at the Site Allocations stage.
- 4.44 The study showed that within the Local Service Centres there remain opportunities for development to take place within their urban areas, with a total of 353 potential new homes being delivered on sites within the Plan period. Of these sites, 153 are greenfield and 200 are brownfield.

Edge of Settlement Assessment

- 4.45 This assessment showed that land is being actively promoted that could potentially accommodate 38,945 dwellings that is suitable for further consideration as land to be potentially identified as additional Strategic Sites or allocated during the Site Allocations process, where additional land is required. Of these sites, the majority (38,310) are located on greenfield sites, with the minority (635) on brownfield sites. Almost a third is located in Crewe and Macclesfield (14,971 in total).
- 4.46 In addition to this, land was also assessed that could accommodate an additional 9,830 dwellings; of these the majority (9,797) would also be on greenfield sites and the minority (33) on brownfield sites. This land is not however considered to be suitable for further consideration, due mainly to the fact that it is not being actively promoted in the Local Plan process or that there is a 'show stopper' constraint present on the site.
- 4.47 Land has also been assessed that is being promoted for employment development; this is a total site area of 73.47 hectares, with this being split between Macclesfield (12.50 hectares); the Key Service Centres

of Alsager (10 hectares); Knutsford (16 hectares) and Nantwich (0.37 hectares); in addition, the freestanding proposal of Cheshire Gateway (34.60 hectares) has also been assessed.

Approach to Sites

4.48 The process of 'Plan making' and the allocation of sites should be considered as a whole made up of the constituent parts of the Local Plan. The Cheshire East Local Plan will consist of three key documents:

- The LPS which sets out the vision, spatial strategy and strategic priorities for Cheshire East up to 2030. It also contains strategic sites / strategic locations for further development
- The SADPD which will allocate the remaining sites proposed for future development and provide detailed policies to be used for new development across the Borough. This will build on the framework for growth set out in the LPS.
- The Waste document, which will set out policies for dealing with waste and identify specific policies for waste management facilities.

4.49 Alongside the Local Plan process sits the opportunity provided by Neighbourhood Planning which will support the implementation of the overall LPS in a way that best addresses local community priorities.

Local Plan Strategy – Approach to Sites

4.50 The site selection process involves a ten-stage process. The stages take account of Edge of Settlement and Green Belt work, and the spatial distribution work including SA/HRA Appraisal.

4.51 The Inspector in the LPS examination process has not yet considered in any detail the appropriateness of the sites and strategic locations that were proposed for development in the LPS. In his clarification letter of the 28th November 2014; he acknowledged that considerable

work has been undertaken on sites, but the reasons for selecting particular sites, compared with other potential sites are not always readily apparent, including the weight to be given to the various factors and associated judgement.

4.52 In response to the above and the identified higher development requirements in housing and employment land; the Council has undertaken supplementary work on site assessment, including those currently included in the submitted plan and any additional or alternative sites should they be required.

4.53 Figure 1 (below) sets out a flow diagram of the approach to site selection. Appendices 7-8 of the Cabinet Report set out the outcomes to Stages 1 to 4 of the flow diagram. A report will be prepared setting out the outcomes of Stages 5 to 10 of the Site Selection process for the consideration of the Inspector in due course.

Key stages in the site selection process

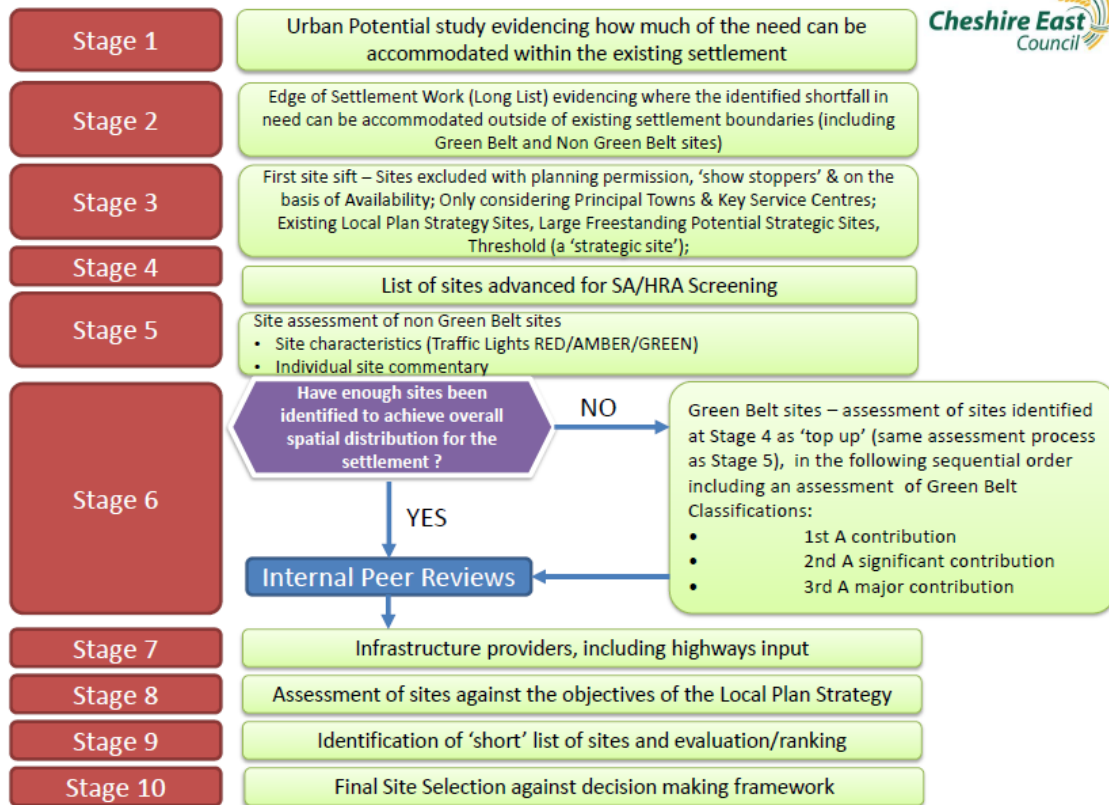


Figure 1: Key Stages in Site Selection Process

Site Allocations DPD – approach to sites

4.54 The SADPD will build upon the framework for sustainable development set out in the LPS and will be formed and consulted upon with residents and businesses. The document will also be informed by the significant amount of consultation undertaken on the Local Plan to date and will flow from the evidence collected. It will also consider sites submitted to the LPS to date, in line with the Site Selection flow diagram set out in Figure 1 (above).

4.55 The SADPD will:

- Identify sufficient sites to maintain a five year supply of deliverable housing sites and meet the 'residual' amounts for housing and employment set out in the LPS.
- Allocate sites for uses such as employment, retail / leisure, Minerals and other uses
- Provide detailed policies to be used in the determination of future planning applications and site allocations covering multiple issues including housing, employment, retail and other uses including Gypsy and Travellers and Minerals etc. These detailed policies will replace the Crewe and Nantwich, Congleton and Macclesfield Local Plans and the Cheshire Replacement Minerals Local Plan (1999).
- Set the limits to development around towns and villages
- Provide a detailed Policies Map which will identify specific areas for uses and designate areas of land that are important and should be protected. This will replace the Proposals Maps associated with the Crewe and Nantwich, Congleton and Macclesfield Local Plans and the Cheshire Replacement Minerals Local Plan (1999).
- Provide further definition of areas including Town Centre Boundaries, Primary and Secondary retail frontages etc.

4.56 Work is underway on the SADPD and the Council has commissioned consultants to undertake a suite of preliminary work, in parallel with the additional work undertaken during the LPS Examination suspension. The first consultation on the emerging SADPD, the proposed 'Issues and Options' consultation, is programmed to take place later in 2015.

Neighbourhood Planning – Approach to Sites

- 4.57 Cheshire East is firmly supporting the uptake of neighbourhood planning across the authority with 24 active neighbourhood plan groups now in place. This number is expected to increase to some 50 this year, and support to date has resulted in the production of four draft plans reaching Regulation 14 stage of the process.
- 4.58 Each of these plans directly addresses the delivery of housing and provides criteria based policies to determine the location, scale and detail of future development proposals. A further 12 plans are anticipated to reach draft stage by the end of the year, all seeking to deal with the delivery of residential development taking account of the framework proposed by the emerging LPS. As this agenda matures in Cheshire East the neighbourhood planning programme is seen as playing a key role in the delivery of sites.

Summary – Approach to Sites

- 4.59 Combining all of these elements it is considered that the Council is well placed to translate the uplift in housing and employment land into deliverable developments. The work undertaken so far demonstrates that additional land can be identified to meet the updated need for homes and jobs. Furthermore there are a number of mechanisms by which the strategic requirements can be promptly and effectively implemented on the ground.

5 ADDRESSING THE INSPECTOR'S CONCERNS

- 5.1 The additional work carried out to supplement the Local Plan evidence base has addressed the Inspector's concerns identified in his Interim Views. Further details are provided in the form of a summary checklist that is appended to this Report (Annex 1 B).

6 SUGGESTED REVISIONS TO THE SUBMITTED LOCAL PLAN STRATEGY

- 6.1 This section identifies the necessary suggested revisions considered by the Council to address and rectify the specific concerns identified in the Inspector's Interim Views and is included in Annexe 1 C.
- 6.2 The key suggested revisions to the submitted LPS relate to the policies within Chapter 8 - Planning for Growth. There is however a series of contextual and consequential changes to the early Chapters of the submitted LPS. These are summarised below and presented in full in the attached schedule at Annex 1 C..

Chapter and Summary of Revision	Additional Commentary
Chapter 1 – Introduction There will need to be small changes to the Key Diagram the main one being the removal of the area of search that was proposed for the new Green Belt. The minor text changes concern the withdrawal request by High Peak for a housing contribution, the intended higher provision of housing and a revised Green Gap policy rather than new Green Belt in the vicinity of Crewe and Nantwich.	These are contextual and consequential changes to the early chapters of the LPS as a consequence of Policy revisions later in the Plan
Chapter 3 – Duty to Co-operate Minor text changes to reflect the revised Green Gap instead of a new Green Belt and the changed High Peak position.	

<p>Chapter 4 – The Case for Growth</p> <p>The only significant change here concerns the new HDS replacing the Strategic Housing Market Assessment Update referring to the numbers in communal establishments.</p>	
<p>Chapter 5 – Vision</p> <p>Minor textual changes to confirm that the aim is to <i>fully</i> meet development needs in locations that reduce the need to travel and stating the intention is to <i>conserve</i> and enhance designated and non-designated heritage assets.</p>	<p>These reflect ‘homework’ item [PS D003.005] concerning Revisions to Local Plan Vision, and Ref 001 of Schedule of Potential Additional Modifications related to Matters 1-13 [PSB021]</p>
<p>Chapter 6 – Strategic Priorities</p> <p>Minor text changes to how Strategic Priorities are intended to be delivered in respect of securing improvements to the built and natural environment, plus ensuring development has regard to local character and context.</p>	<p>These reflect refs 002 / 003 of Schedule of Potential Additional Modifications related to Matters 1-13 [PSB021]</p>
<p>Chapter 8 – Planning For Growth</p> <p>Policy PG1 (Overall Development Strategy) – suggested changes to housing and employment quantum of development. Removal of phasing</p>	<p>These suggested revisions reflect the evidence set out in the Alignment of Economic, Employment and Housing Strategy Report, Duty To Co-operate summary note, Housing Development Study and Housing Requirement</p>

and reference to provision for High Peak.	Annexe.
Chapter 8 – Planning For Growth Policy PG2 (Settlement Hierarchy) Minor suggested revisions to policy wording and associated visions.	These proposed minor modifications reflect ‘homework’ item [PS D003.012] (Settlement Hierarchy)
Chapter 8 – Planning For Growth Policy PG3 (Green Belt) Deletion of references to a new area of Green Belt adjacent to Crewe.	These suggested revisions reflect the evidence set out in the New Green Belt and Green Gap Policy Technical Annex (Annex 1.F).
Chapter 8 – Planning For Growth Policy PG4 (Safeguarded Land)	These suggested revisions reflect the evidence set out in the Arup Safeguarded Land Advice Note (May, 2015)
Chapter 8 – Planning For Growth Policy PG4a (new Green Gaps policy)	These suggested revisions reflect the evidence set out in the New Green Belt Policy Note (April, 2015)
Chapter 8 – Planning For Growth Policy PG5 (Open Countryside) Minor revisions to policy wording	These suggested revisions reflect the revisions proposed in the Council’s Matter 6 Response Statement [M6.1.001a].
Chapter 8 – Planning For Growth Policy PG6 (Spatial Distribution) Revisions to Spatial Distribution policy	These suggested revisions reflect the evidence set out in the Spatial Distribution Update report

6.3 The suggested revisions represent the Council's view that the submitted LPS can deliver the development requirements needed to meet the higher levels of need identified in the additional evidence base.

6.4 The suggested revisions are aligned with the LPS Vision and Strategic Priorities. Paragraph 3 of the Vision refers to meeting the full needs for housing and employment development in locations that reduce the need to travel. The approach and thrust of the LPS remains focused on directing new development to the larger settlements in the Borough in line with the settlement hierarchy. In addition, the Council's approach to Spatial Distribution has been considered by AECOM to be broadly justified and has been the basis by which the uplift in housing and employment requirements has been distributed.

6.5 In respect of the alignment of the suggested revisions with the Strategic Priorities set out in the submitted LPS:

Strategic Priority	Comments
1 – Promoting economic prosperity by creating conditions for business growth	The suggested revisions increase the provision for a viable and flexible supply of quality employment land; deliver an ambitious 0.7% jobs growth rate resulting in 31,400 jobs over the Plan period. This is considered to align with and assist the overall delivery of Strategic Priority 1 of the submitted LPS.
2 – Creating sustainable communities	Strategic Priority 2 states that the LPS will create sustainable communities by providing for the full, OAN for housing for the Borough to support economic growth and to meet housing needs. It goes on to state that the focus for development will

	<p>be in sustainable locations (such as Principal Towns, Key Service Centres), ensuring an appropriate mix of house types, sizes and tenures including affordable housing to meet the Borough's needs and enabling vulnerable and older people to live independently, longer.</p> <p>The Housing Requirement set out in the suggested revisions to Policy PG1 will accommodate the OAN of the Borough and align with Strategic Priority 2. The inclusion of housing for older people within the OAN calculation and housing requirement is aligned to Strategic Priority 2 and Policy SC4 (point 2) in providing for older person's accommodation enabling vulnerable and older people to live independently, longer.</p>
3 – Promoting and enhancing environmental quality	<p>The introduction of the new green gap policy will seek to maintain the character and separate identify of two of the Borough's towns and is therefore considered to align with strategic priority 3. The thrust of the Spatial Distribution in directing development to the larger centres should also provide for sustainable patterns of development and protect and enhance environmental quality in the Borough.</p>
4 – Reducing the need to travel	<p>The thrust of the Spatial Distribution in directing development to the larger centres should also provide for sustainable patterns of development and protect and enhance environmental quality in the Borough.</p>

7 EFFECT OF SUGGESTED REVISIONS ON SUBMITTED LPS

KEY POINTS SUMMARY

- There is no guidance on what constitutes a fundamentally or significantly 'different' plan; the Council contends that it is the underlying strategy that is of importance rather than the accompanying metrics within it.
- The fundamental strategy of the submitted LPS remains unaltered; indeed the additional evidence strengthens it.
- Key principles such as economic growth around key sectors, housing provision over and above past plans, selective revision of green belt and the separation of Crewe and Nantwich all remain unchanged
- Suggested revisions to the LPS better align to sub-regional economic policy, the NPPF and PPG advice.

7.1 The Council has taken time to fully consider the implications of the Inspector's Interim Views, alongside additional the evidence gathered during the suspension period. The Council has delivered on its proposed timetable and prepared suggested revisions to the LPS. The Council considers that these revisions, alongside the updated evidence base, address the issues raised in the Inspector's Interim Views issued in November 2014. The nature and content of these suggested revisions do not result in a fundamentally different spatial approach, or strategy, or result in substantial modifications which result in a significantly different Plan.

7.2 The question of what constitutes a 'different' plan has no definitive parameters – but it is considered that relevant matters would involve

the scale of revisions, their timescale and their number – but also – and most importantly, whether they affected the underlying approach of the plan.

7.3 At its heart a strategic plan is the essential spatial vision for an area. It captures the essence of what the local authority and its community seek to achieve when placed in a geographical context. Within that strategy the metrics may well change – but the fundamental vision need not.

7.4 The LPS always sought to promote a growth strategy based on the unique characteristics of the area. This is unchanged by the economic evidence which merely elevates the growth assumptions based on current expanding sectors. The Strategy always took account of an ageing demographic – and for that very reason was more cautious over growth. This issue remains at the forefront of discussion within the new evidence. The Strategy always sought to increase housing over and above past Development Plan's. This principle is unchanged by the new evidence – it is the scale of the increase that is amended. The Strategy always acknowledged the need to alter Green Belt boundaries in the north of the Borough. This is unchanged by the new evidence – even if this detailed approach may change. The Strategy always sought to mark the separation of Crewe and Nantwich. This is unchanged by the evidence on the new Green Belt. The planning mechanism may be different, but its replacement by a green gap policy retains the underlying principle. The Strategy always focussed growth on key themes – high growth city and the science corridor. These too remain unaltered by the evidence. Finally the settlement hierarchy – a key factor in a polycentric borough has already been endorsed by the Inspector – and so this also is unchanged.

- 7.5 Accordingly the fundamentals of the plan are not considered to be significantly 'different' the LPS is a strategic document – and it is the essential strategy that remains the same.
- 7.6 In terms of the scale of the numerical change, these vary in significance. The change in Housing Requirement from 27,500 to 36,000 is not directly comparable since the latter incorporates provision for older accommodation / Use Class C2 units. The uplift from 27,500 to 34,000 dwellings (net of Use Class C2 units) represents an increase of 24%. By way of comparison, a recent Inspector's Examination Report on the Cherwell District Local Plan accepted that an increase of 36% did not result in a significantly different plan.
- 7.7 Clearly, the increase in the number of jobs proposed is much more significant climbing from 13,900 to 31,400. However, the advice from Ekosgen suggests that this need only prompt an increase in employment land of 27 hectares.
- 7.8 Therefore, whilst the updated evidence unquestionably points to revisions in the submitted plan – the scale, scope and extent of these are within a reasonable tolerance – especially given that the underlying strategy remains fundamentally unaltered.
- 7.9 Moreover, it is important to remember the fundamental role that an up-to-date adopted Local Plan has in the delivery of sustainable development in a plan-led manner in accordance with the Planning Acts and the importance Government policy places upon putting in place Local Plans prepared and adopted in accordance with the National Planning Policy Framework as a matter of priority without undue delay.
- 7.10 Furthermore, the powers of a person appointed to examine a submitted Local Plan were amended by the Localism Act 2011, which introduced

a duty on the appointed person, where requested to do so by the local planning authority, to recommend modifications to make the Plan sound and legally compliant. The effect of those amendments is that, since January 2012, persons appointed to examine local plans are now empowered to deliver the national policy objective of ensuring up-to-date local plans are adopted without delay.

The rationale for the Suggested Revisions

- 7.11 The LPS submitted for examination was affected by the timing of submission, with the speed and strength of economic recovery uncertain for a number of years. In spite of this uncertainty, the strategic economic ambition of Cheshire East Council has been set out in its plans for Crewe and the Cheshire Science Corridor. It is also reflected in the more recently developed Strategic Economic Plan for Cheshire and Warrington, with which the LPS is considered to align.
- 7.12 The earlier economic forecast set these plans within a low employment growth context, while more recent forecasts provide a return to longer term employment growth patterns (which unlike previous growth, will not be boosted by significant growth in public sector employment). While the new forecast provides a more robust basis for employment growth, the type of growth is effectively reflected in the original submission and the employment land allocation.
- 7.13 The work completed to address your comments, expressed in the Interim Views has allowed full consideration to be taken of more recent economic forecasts which:
- take account of how the UK economy has fully emerged from the global financial crisis and economic downturn. While these forecasts indicate a higher rate of employment growth, the general trends in the economy are in line with the direction of travel and economic priorities set out in the original submission.

As such, the revised economic and housing numbers can be regarded as an evolution of the original plan, rather than fundamentally different.

- envisages Cheshire East matching growth in the national economy, as it has in the past, although without the boost of high levels of growth in public sector employment. The change in the forecasts reflect more confidence in terms of economic growth nationally, rather than a significant change to the composition or scale of growth in Cheshire East, with the growth projections closer to an average rate based on a projection of 15 years of uninterrupted growth. In particular, the employment forecast suggests that the main drivers of employment change will be in professional, financial and business services, with contributions from a wide range of sectors such as construction, ICT, logistics/distribution and retail.

7.14 The revised employment forecast translates into a need for a further 27 hectares of employment land, an 8% increase from the upper end of the range of 300 to 350 hectares suggested in the original submission.

7.15 The LPS is expected to comply with the NPPF including by defining the full, OAN for both market and affordable housing at the outset before deciding whether or not it can be delivered in practice, taking into account relevant national and important local constraints, such as Green Belt.

7.16 The Council has responded positively to concerns, expressed in the Interim Views, on the Council's approach to the identification of the OAN for housing and alignment with the economic strategy set out in the LPS. The Council has responded by reconsidering their figures, based on updated evidence, and producing suggested revisions, in accordance with guidance in the NPPF and PPG. These revisions take a balanced and measured approach and are considered to align with

the thrust of the Council's Vision and Strategic Priorities set out in the LPS in meeting its OAN in full and directing development to larger settlements, which provide for a good range of services and facilities.

- 7.17 The HDS identified an OAN for Housing in Cheshire East equivalent to an average of 1,800 dwellings per year, compared to the Submitted LPS (36,000 dwellings up to 2030). In line with the approach of the PPG, this figure includes an allowance for older person's accommodation (primarily C2) which accounts for 2,180 units over the Plan Period. The housing figures within the (pre-PPG) submitted plan excluded such C2 accommodation.
- 7.18 The Council also wishes to emphasise that since the base date of the submitted plan (31 December 2013) planning permissions have continued to be granted in sustainable locations. When these are added to the sites / allocations already set out in the Submitted Plan a total figure of 32,062 dwellings have already been identified as of 31 March 2015. This is before any consideration of the fresh evidence is made.
- 7.19 The Council also expects to make other new housing and employment land allocations in the SADPD which the Council intends to progress expediently following the LPS. There will also be contribution from 'Windfalls' (NPPF, ¶48) as well as sites brought forward through neighbourhood plans. Therefore the suggested modifications can be accommodated and represent an evolution of the original submission, rather than a fundamentally or significantly different plan.
- 7.20 The Plan's Vision, Objectives and Overall Strategy of the LPS supporting sustainable, jobs-led growth and sustainable vibrant communities in a balanced way to secure a healthy and prosperous

future for the entire Borough will be supported by the suggested revisions to the LPS.

- 7.21 In addition, the suggested revisions have responded to external factors. A key feature of the submission version Plan was a overall development strategy which included an additional 500 dwelling contribution to help meet housing needs in High Peak Borough. Through on going Duty to Co-operate discussions and by reflecting the current progress on the High Peak Borough LPS Examination it is considered appropriate to respond to changes in the overall High Peak housing requirement following the publication of the DCLG 2012-based household projections.

8 CONCLUSION

- 8.1 This report presents a summary of the work undertaken during the suspension of the LPS Examination and provides details of the additional evidence gathered, engagement undertaken, the Council's suggested revisions to the submitted LPS and any other matters considered relevant for the Inspector's consideration.
- 8.2 The Council will assist the Inspector with any queries or requests for additional information.

ANNEXES

- 1. A. Schedule of Additions to the Local Plan Evidence Base

- 1. B. Summary of Inspector's Questions and Requirements and
 References to Responses by Cheshire East Council

- 1. C. Schedule of Suggested Revisions to the Submitted Local Plan
 Strategy

- 1. D. Housing Technical Annexe

- 1. E. Safeguarded Land Technical Annexe

- 1. F. New Green Belt / Green Gap Policy Technical Annex

ANNEX A SCHEDULE OF ADDITIONS TO THE LOCAL PLAN EVIDENCE BASE

- Cabinet Report on the Local Plan Strategy

Appendices

- Appendix 1: Report of the additional work undertaken during the suspension period of the Local Plan Strategy
- Annex 1.A: Schedule of Additions to the Local Plan Evidence Base
- Annex 1.B: Checklist of Evidence Including Cross-references to Relevant Paragraphs in the Inspector's Interim Views
- Annex 1.C: Schedule of Suggested Revisions to the Submitted Local Plan Strategy
- Annex 1.D: Housing Requirement Technical Annex
- Annex 1.E: Safeguarded Land Technical Annex
- Annex 1.F: New Green Belt and Green Gap Policy Technical Annex

Core Evidence

- Appendix 2: Alignment of Economic, Employment and Housing Strategies - Ekosgen
- Appendix 3: Cheshire East Housing Development Study - ORS
- Appendix 4: Green Belt Assessment Update - Arup & Cheshire East Council
- Annex 4.A: Green Belt Assessment Update Further Annex Parcels - Arup & Cheshire East Council
- Appendix 5: Spatial Distribution Update Report - AECOM
- Appendix 6: Highways Studies - Atkins, CEC and Jacobs
- Appendix 6a: Impact of Spatial Distribution of Local Plan Development on Cross Boundary Highway Networks
- Appendix 6b: Crewe VISSIM Study
- Appendix 6c: Alsager Highway Study
- Supporting Evidence:
 - Appendix 7: Assessment of the Urban Potential of the Principal Towns, Key Service Centres and Local Service Centres and Possible Development Sites Adjacent to those Settlements
 - Appendix 8: Cheshire East Local Plan Strategy Site Selection Methodology

Suggested Revisions

- Appendix 9: Schedule of Suggested Revisions to the Local Plan Strategy

Statutory Assessment

- Appendix 10: Sustainability Appraisal

- Appendix 11: Habitats Regulations Assessment

**ANNEX B CHECKLIST OF EVIDENCE INCLUDING CROSS REFERENCES TO
RELEVANT PARAGRAPHS IN THE INSPECTOR'S INTERIM VIEWS**

**Summary of Inspector's Questions and Requirements and
References to Responses by Cheshire East Council**

July 2015

This document provides cross references between the specific questions set out by the LPS Inspector, as set out in the Interim Findings and letter of clarification dated 28th November 2014, and the responses provided by Cheshire East Council. Section / Paragraph references are provided to the requirements and questions set out in these two documents. The sources of information to respond to each point are provided through reference to the report titles and relevant section references within these documents. In some cases the response is provided in a section of a report but in addition attention is drawn to a particularly relevant subsection in brackets. Nonetheless, it is recommended that the whole section is read to find a more comprehensive response to the question. This document provides cross reference to the key sources of information. It is not intended to be comprehensive. It is intended that this document aids easy quick cross reference to key information sources that respond to the Inspector's questions and requirements.

Interim findings Para. Ref.	28/11/14 Letter Para. Ref.	Inspector's Requirement	Report	Section Reference	Comment
Economic Strategy					
29	2i	1.1 Explain rate of job growth related to previous rates.	Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015)	S2-3	
31	2i	1.2 Explain likely jobs on proposed employment sites.	Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015)	S3	
29		1.3 Demonstrate that job growth reflects long-term aspirations of the LPS.	Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015)	S4	
32		1.4 Explain differences between LPS and LEP aspirations.	Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015)	S4	
32		1.5 Explain differences between LPS and LEP evidence. Particular detail is needed where funding is provided and job growth is specified.	Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015)	S4 (S4.22-4.24)	
34		1.6 Ensure economic opportunities outside CE are accounted for in job and housing figures for within CE.	Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015)	S3-4	
34		1.7 Explain likely job growth and land requirements for logistics.	Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015)	S2, S4 (S4.41-4.49)	
30		1.8 Provide evidence for estimates of older person employment rates.	Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015) Appendix 3: Cheshire East Housing Development Study 2015 (ORS, June 2015)	S3 S3.30-3.34	Section 3 of the Alignment of Economic, Employment and Housing Strategy details the economic projections used. Section 3 of the Housing Development Study details the assumptions used for older people.
31	2i	1.9 Explain relationship between jobs anticipated on allocated sites and job forecast.	Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015)		The issues surrounding supply are linked to the consideration and allocation of sites. Therefore, the Council intends addressing this requirement by September 2015.
31		1.10 Provide details of non B use job growth.	Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015)		The Council has recently commissioned consultants to undertake an update to the Cheshire Retail Study alongside Cheshire West and Chester. This will consider retail and leisure uses in the Borough and will inform the Site Allocations and Development Management Policies DPD.
35	2i	1.11 Show that the level of employment and jobs growth (B and non B use) will not be unduly constrained by proposed housing provision.	Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015)	S3 S(3.9)	
Housing and Demography					
40, 41, 45	2ii	2.1 Demonstrate how the OAN base level responds to all factors set out in NPPG, namely demographic, housing and economic factors. State assumptions and be clear how all factors have been taken into account. – identify all NPPG/F elements and check all addressed.	Appendix 3: Cheshire East Housing Development Study 2015 (ORS, June 2015)	S3	
44	2iii	2.2 Set out rationale for time period for migration rates. Longer time periods are recommended with caution over time during recession.	Appendix 3: Cheshire East Housing Development Study 2015 (ORS, June 2015)	S3 (S3.19-3.21)	
49		2.3 Demonstrate consistency between proposed levels of jobs and housing.	Appendix 3: Cheshire East Housing Development Study 2015 (ORS, June 2015) Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015)	S5 (S5.73 – 5.92) S3 (S3.9)	
51,53		2.4 Demonstrate level of future housing is adequate to meet economic objectives.	Appendix 3: Cheshire East Housing Development Study 2015 (ORS, June 2015) Appendix 2: Alignment of Economic, Employment and Housing Strategy (Ekosgen, June 2015)	S5 (S5.73 – 5.92) S3 (S3.9)	
68		2.5 Assess higher housing numbers in addendum SA.	Appendix 10: Local Plan Strategy; Suggested Revisions Sustainability (Integrated) Appraisal Addendum Report (July 2015)	S4 and Appendix I (Fresh SA of Growth Options)	

Interim findings Para. Ref.	28/11/14 Letter Para. Ref.	Inspector's Requirement	Report	Section Reference	Comment
39,40		2.6 Redraft housing requirement in line with latest good practice.	Appendix 3: Cheshire East Housing Development Study 2015 (ORS, June 2015)	S2, S3	
41		2.7 Ensure basis for base figure is clearly explained and uses most up to date evidence.	Appendix 3: Cheshire East Housing Development Study 2015 (ORS, June 2015)	S3 (S3.6)	
41,46		2.8 Reference assumptions in OAN from Housing Development Study.	Appendix 3: Cheshire East Housing Development Study 2015 (ORS, June 2015)	S5	Paragraph 41 of the Inspector's Interim Views asked for clarification on the base line figure for the OAN.. Paragraph 46 asked how information on Market Signals has been taken account in any uplift for the OAN. Section 5 of the Housing Development Study clearly sets out the 'starting point' estimate for OAN (para 5.21) and addresses Market Signals (para's 5.30-5.57)
42,43		2.9 Explain rationale for household formation rates based on current figures.	Appendix 3: Cheshire East Housing Development Study 2015 (ORS, June 2015)	S3	
40		2.10Provide clarification between OAN and housing requirement. This includes demographic and economic based OAN.	Appendix 3: Cheshire East Housing Development Study 2015 (ORS, June 2015)	S3, S5	
47,48		2.11Ensure policy plans to meet affordable housing need.	Appendix 3: Cheshire East Housing Development Study 2015 (ORS, June 2015)	S4 (S4.96-4.107)	
56		2.12Justify assumptions on lead in times and build out rates on strategic sites.			The issues surrounding housing supply are linked to the consideration and allocation of sites. Therefore, the Council intends addressing this requirement by September 2015.
57		2.13Explain that SHLAA sites will include those proposed by land owners / developers and cannot all therefore be considered to be appropriate for development.			The issues surrounding housing supply are linked to the consideration and allocation of sites. Therefore, the Council intends addressing this requirement by September 2015.
58		2.14Establish clear reasoning behind 'Liverpool' approach			The issues surrounding housing supply are linked to the consideration and allocation of sites. Therefore, the Council intends addressing this requirement by September 2015.
60		2.15Explain approach to windfalls and make clear the difference between windfall and small sites.			The issues surrounding housing supply are linked to the consideration and allocation of sites. Therefore, the Council intends addressing this requirement by September 2015. No windfall allowance is included.
60		2.16Demonstrate no double counting of windfall sites.			The issues surrounding housing supply are linked to the consideration and allocation of sites. Therefore, the Council intends addressing this requirement by September 2015. No windfall allowance is included.
61		2.17Demonstrate all appropriate opportunities for brownfield sites have been explored and the likely scale.	Appendix 7: Assessment of the Urban Potential of the Principal Towns, Key Service Centres and Local Service Centres(July 2015)	S5	
62		2.18Justify stepped housing requirement.	Suggested Revisions Log SR 17		The suggested revisions to the Local Plan Strategy remove references to a stepped housing requirement – the housing requirement of 36,000 is intended to be delivered at an average of 1,800 net additional dwellings per year.
65		2.19Ensure sufficient 'headroom' is retained if the housing requirement is increased.			The issues surrounding housing supply are linked to the consideration and allocation of sites. Therefore, the Council intends addressing this requirement by September 2015.
66		2.20Justify the 500 dwelling figure from High Peak.	Suggested Revisions Log SR 17		The suggested revisions to the Local Plan Strategy remove references to a contribution of 500 dwellings towards the housing requirement for High Peak.
68		2.21Demonstrate consideration of alternative housing numbers put forward by third parties where these have supporting evidence.	Appendix 10: Local Plan Strategy; Suggested Revisions Sustainability (Integrated) Appraisal Addendum Report (July 2015)	S4 and Appendix I (Fresh SA of Growth Options)	The Council has commissioned ORS to review its overall Objective Assessment of Housing Need. It has used this evidence to consider all reasonable alternatives through the SA process.
Green Belt and Safeguarded Land					
83		3.1 Clarify timeline in developing the case and preparing evidence of the need for Green Belt release.	Appendix 4: Green Belt Assessment Update 2015 (CEC with Arup, July 2015)	S3.5	

Interim findings Para. Ref.	28/11/14 Letter Para. Ref.	Inspector's Requirement	Report	Section Reference	Comment
83		3.2 Ensure proposed Green Belt release sites are evidenced as not having a strong contribution to the Green Belt (all sites, including safeguarded land).	Appendix 4: Green Belt Assessment Update 2015 (CEC with Arup, July 2015)	S4, S9.2.1	The issues surrounding the consideration and allocation of sites are intended to be addressed by September 2015.
85		3.3 Ensure and demonstrate that all 5 Green Belt purposes are given equal weight in site assessment.	Appendix 4: Green Belt Assessment Update 2015 (CEC with Arup, July 2015)	S4, S9.2.2	
85		3.4 Ensure consistency in assessment and selection of sites for release.	Appendix 4: Green Belt Assessment Update 2015 (CEC with Arup, July 2015) Site selection methodology flow diagram	S4,S 9.2.2	The issues surrounding the consideration and allocation of sites are intended to be addressed by September 2015.
85		3.5 Ensure small and larger sites are included in the assessment (Green Belt and safeguarded land).	Appendix 4: Green Belt Assessment Update 2015 (CEC with Arup, July 2015)	S4.3, S9.2.3	
88	2iv	3.6 Ensure Green Belt function is given greater weight compared with other factors (all sites, including safeguarded land).	Appendix 1	S4.30-4.56	The issues surrounding the consideration and allocation of sites are intended to be addressed by September 2015
86		3.7 Include impact on wider Green Belt beyond CE in assessments.	Appendix 4: Green Belt Assessment Update 2015 (CEC with Arup, July 2015)	S4, S9.2.4	
23		3.8 Engage with SMBC in Green Belt assessment.	Appendix 4: Green Belt Assessment Update 2015 (CEC with Arup, July 2015)	S4.6, S9.2.5, Appendix D	
91	2vi	3.9 Identify exceptional circumstances needed to establish proposed new Green Belt.	Appendix 1, Annex F: New Green Belt Policy Note (April 2015)	See comment	New Green Belt is no longer proposed
91	2vi	3.10Provide evidence to support the likely extent of new Green Belt.	Appendix 1, Annex F: New Green Belt Policy Note (April 2015)	See comment	New Green Belt is no longer proposed
91		3.11Set out implications of proposed development in area of new Green Belt search area.	Appendix 1, Annex F: New Green Belt Policy Note (April 2015)	See comment	New Green Belt is no longer proposed
92	2vi	3.12Demonstrate other policy is insufficient and new Green Belt is therefore required.	Appendix 1, Annex F: New Green Belt Policy Note (April 2015)	See comment	New Green Belt is no longer proposed
	2vi	3.13If sufficient information is available, include proposed detailed boundaries of new Green Belt.	Appendix 1, Annex F: New Green Belt Policy Note (April 2015)	See comment	New Green Belt is no longer proposed
	2v	3.14Ensure clear justification for scale of safeguarded land release.	Appendix 1, Annex E: Safeguarded Land Technical Annex	All	
Site Selection and Spatial Distribution					
	2vii	4.1 Set out weight given to criteria in assessing sites.	Appendix 1	S4.30-4.56	The issues surrounding the consideration and allocation of sites are intended to be addressed by September 2015
	2vii	4.2 Ensure consistent approach to site selection.	Appendix 1	S4.30-4.56	The issues surrounding the consideration and allocation of sites are intended to be addressed by September 2015
75		4.3 Justify spatial distribution by settlement, especially the rationale for sites in the north.	Appendix 5: Spatial Distribution Update Report (Aecom, July 2015)	S16/17/18	
76	2vii	4.4 In settlements in the north, particularly make clear that all non Green belt sites have been considered and then apply Green Belt assessment consistently (this is as set out above but particular reference is needed in the north).	Appendix 7: Assessment of the Urban Potential of the Principal Towns, Key Service Centres and Local Service Centres(July 2015)	S5	The issues surrounding the consideration and allocation of sites are intended to be addressed by September 2015
76		4.5 Where settlements cannot meet their own needs, demonstrate how the needs of these settlements will be met. Set out the rationale to distribution and explain the relationship	Appendix 5: Spatial Distribution Update Report (Aecom, July 2015)	S14	
77		4.6 Explain whether a spatial distribution option was considered based on existing population distribution and needs of each settlement.	Appendix 5: Spatial Distribution Update Report (Aecom, July 2015)	S4	
78		4.7 Demonstrate full consideration of smaller sites within or on the fringe of existing settlements.	Appendix 7: Assessment of the Urban Potential of the Principal Towns, Key Service Centres and Local Service Centres(July 2015)	S5	

Appendix 1: Annex C Suggested Revisions Log

Local Plan Strategy:

REF	Policy / Chapter / Paragraph	Page	Suggested Revision
SR 1	Figure 1.1 CEC Local Plan Strategy Key Diagram	2	Key Diagram will be updated to reflect updated evidence and the outcomes of the examination hearing sessions.
SR 2	Introduction - Paragraph 1.11	3	Suggested revision to paragraph as follows: “The answer from neighbouring local authorities is that they are not in a position to assist, however other than High Peak Borough Council , and they have not asked Cheshire East Council to accommodate any of their development requirements either”.
SR 3	Introduction – paragraph 1.16	4	Suggested revision to paragraph as follows : A <u>revised Green Gap policy</u> new area of Green Belt is proposed in the vicinity of Crewe and Nantwich to ensure settlements here do not coalesce whilst still leaving appropriate scope for further development in the Plan period and beyond. The exact boundaries of this <u>revised new Green Belt area Gap</u> will be determined through the Local Plan Site Allocations and Development Policies Document.
SR 4	Introduction – paragraph 1.27	5	Suggested revision to paragraph as follows The overall growth proposition is to deliver <u>at least over 36,000</u> 27,000 new homes by 2030 and around <u>31,000</u> 20,000 jobs in the longer term by 2030. These figures represent a pro-growth policy position, that is forecast to see the Borough's population grow by around 40,000 <u>58,100</u> people. Policies in this Plan will also make sure that the right mix of new homes is provided to meet the needs of a growing workforce and support both current and future employers. This is set within the demographic context that Cheshire East will have a 26 <u>65</u> % increase in over 65s and a 35 <u>134</u> % increase in over 85s by 2024 <u>over the Plan period</u> .
SR 5	Introduction – paragraph 1.30	5	Last sentence will be updated when the number of sites are known following the outcome of the consideration of sites in the examination process: “There are 31 strategic sites, 9 strategic locations and 6 safeguarded sites proposed in this Plan”.

SR 6	Introduction – paragraph 1.39	6	<p>Sentence will be updated when the number of sites are known following the outcome of the consideration of sites in the examination process:</p> <p>“In total, the Plan proposes detailed boundary amendments to the Green Belt that exclude an area of less than 1% of the total existing area of Green Belt in the Borough”.</p>
SR 8	Introduction – paragraph 1.43	6	<p>Suggested revision to paragraph as follows :</p> <p>This Plan will provide for <u>at least</u> over 36,000 27,000 new homes by 2030. This does not mean house building to meet a false target, but a considered approach to meeting the needs of future demographic changes and to make sure that current and future employers have a skilled, local workforce who can support their growth.</p>
SR 9	Duty to Co-operate – paragraph 3.5	37	<p>Suggested revision to bullet points as follows:</p> <p>Progressive iterations of this Plan have directly addressed specific cross boundary issues raised by neighbouring authorities and consultees. Full details of the changes / shared understandings are referred to in the Duty to Co-operate Statement and are summarised below:</p> <ul style="list-style-type: none"> Reduced development proposed south east of Crewe with less land to be removed from the Green Belt and a <u>revised Green Gap</u> proposed new Green Belt in the Crewe/Nantwich area. <p>A housing requirement figure that does not adversely impact on neighbouring areas and assists with housing needs in High Peak.</p>
SR 10	The Case for Growth – paragraph 4.4	40	<p>Suggested revision to paragraph as follows :</p> <p>The Government has invited Local Enterprise Partnerships (LEP) to produce Strategic Economic Plans (SEPs) for their areas as the basis of funding negotiations to drive economic growth. The emerging Cheshire and Warrington SEP includes a number of transformational projects in Cheshire East including High Growth City, which focuses on linking Crewe and Macclesfield by way of Congleton to create a 'corridor of opportunity'. The sustainable growth aspirations set out in the Local Plan Strategy are a key element in meeting the ambition of a LEP and fulfilling Cheshire East's sub-regional role.</p>
SR 11	The Case for Growth – paragraph 4.9	41	<p>Suggested revision to paragraph as follows :</p> <p>Furthermore, there are clear demographic challenges in the Borough, with a declining proportion of working age population. The Strategic Housing Market Assessment Update (2013) Housing Development Study (2015) identifies that managing demographic change will become an increasingly important issue with the population in Cheshire East of pensionable age and above continuing to grow,</p>

			from <u>70,300</u> 83,524 in 2010 to <u>115,900</u> 124,544 by 2030.
SR 12	Vision for Cheshire East in 2030	47	Suggested revision to 3 rd paragraph as follows: “Well designed new employment and housing development will have been developed to <u>fully</u> meet local needs in locations that reduce the need to travel”.
SR 13	Vision for Cheshire East in 2030	47	Suggested revision to 7 th paragraph as follows: “Our many areas of landscape value, sites of nature conservation importance, characteristic waterways and heritage assets will have been protected from development, <u>conserved</u> and enhanced where possible, through environmental and heritage designations placed on specific assets including valued Green Belt <u>through appropriate development that recognises the importance of both designated and non-designated assets within their setting and safeguarding them for future generations.</u> ”
SR 14	Strategic Priority 1	51	Suggested revision to Strategic Priority 1 Point 8 as follows: “Supporting high quality design <u>and securing improvements to the built and natural environment.</u> ”
SR 15	Strategic Priority 2	51	Suggested revision to Strategic Priority 2 Point 5 as follows: “Ensuring that all new development is well designed, <u>has regard to local character and context and is sustainable and energy efficient</u> ”
SR 16	Planning for Growth – paragraph 8.2	60	Suggested revision to paragraph as follows : The NPPF also states that Local Plans should meet objectively assessed needs unless there would be significant adverse impacts or where the NPPF indicates development should be restricted. Key evidence of need in relation to the economy includes the Employment Land Review and local business surveys, whilst <u>population forecasts and other</u> key evidence to assess housing need <u>and capacity</u> has come from the <u>Strategic Housing Market Assessment (SHMA) 2010 and 2013 update, Housing Development Study 2015 and the Strategic Housing Land Availability Assessment (SHLAA) 2012 and population forecasts.</u>
SR 17	Policy PG1 – Overall Development Strategy	60	Suggested revision to Policy as follows : 1. Provision will be made for a minimum of <u>380</u> 300 hectares of land for business, general industrial and storage and distribution uses over the period 2010 to 2030, to support growth of the local economy. 2. Sufficient land will be provided to accommodate the full, objectively assessed needs for the Borough of at least <u>36,000</u> 27,000 homes between 2010 and 2030. This will be delivered <u>as follows – at an average of 1,800 net additional dwellings per year.</u>

			<p><u>Footnote added to state - The figure of 36,000 homes includes an allowance of 2,185 units of older person's accommodation; this encompasses both Use Classes C2 and C3.</u></p> <p>o 2010/11(35) to 2014/15 – an average of 1,200 homes each year (6,000 in total); o 2015/16 to 2019/20 – an average of 1,300 homes each year (6,500 in total); o 2020/21 to 2024/25 – an average of 1,400 homes each year (7,000 in total); 3.2. 2025/26 to 2029/30 – an average of 1,500 homes each year (7,500 in total) at an average of 1,800 net additional dwellings per year.</p> <p>3. In addition to meeting the full, objectively assessed needs of Cheshire East, provision will be made for up to 500 homes to assist with meeting the housing needs of High Peak Borough during the period 2020 to 2030. These will be delivered as follows: o 2020/21 to 2029/30 – an average of 50 homes each year (500 in total)</p>
SR 18	Planning for Growth – paragraph 8.4	61	<p>Suggested revision to paragraph as follows: “The Employment Land Review <u>and the Alignment of Economic, Employment and Housing Strategy report (2015)</u> are is the primary sources of evidence related to the requirements for employment land. <u>They</u> It uses a variety of methods to forecast the requirements for new employment land between 2009 and up to 2030. It <u>The Employment Land Review</u> considers the annual average rates of take-up of employment land over the past 25 years, as well as forecasting future demand for employment land using econometric data and population forecasts. It also looks at the annual average amount of employment land lost to other uses over the past 15 years”.</p>
	Planning for Growth – paragraph 8.5	61	<p>Suggested revision to paragraph as follows:</p> <p>Using all the available information, and in accordance with the 2004 ODPM Guidance Note on Employment Land Reviews, the study gives a range for the amount of employment land that will be required between 2009 and 2030. This range is between 278 hectares and 324 hectares, which includes a flexibility factor of 30% to reflect Cheshire East's aspirations for employment-led growth. This flexibility factor will allow the employment land supply to be flexible enough to deal with future economic changes, increases in employment land losses or increases in demand.</p> <p><u>The Alignment of Economic, Employment & Housing Strategy (AEEHS) report (2015) used updated econometric projections, which pointed to a significantly greater employment growth rate over the Plan period than the Employment Land Review's econometric projections did. The AEEHS used a methodology that is largely in line with the assumptions and approaches used in the Employment Land</u></p>

			<u>Review, but concluded that a 20% flexibility factor was more appropriate, given the use of more optimistic employment forecasts. The AEEHS results suggest that an additional 27 hectares will be required and so the revised Plan proposes sites that deliver employment land totalling 378 hectares.</u>
SR 19	Planning for Growth – paragraph 8.6	61	<p>Delete paragraph as follows:</p> <p>“The overall provision set out in the Employment Land Review equates to an annual provision of between 13.2 hectares and 15.4 hectares. Extrapolating this across the 20 year plan period gives an overall requirement of between 265 hectares and 308 hectares between 2010 and 2030. The minimum provision of 300 hectares of employment land as set out on Policy PG1 is toward the upper end of this range which is an appropriate figure for a strategy based on jobs-led growth”.</p>
SR 20	Table 8.1	61	<p>Amend Figures in table 8.1:</p> <p>“Completions 1st April 2010 to 31st March 2013: 1.6 Employment Land Supply 1st April 2013: 445.5 <u>112.8</u> Total Completions and Supply: 447.4 <u>114.4</u> Remaining (minimum): 482.9 <u>185.6</u></p>
SR 21	Planning for Growth – paragraph 8.8	61	<p>Suggested revision to paragraph as follows:</p> <p>As a minimum, the <u>The Housing Requirement set out in Policy PG1 responds to the Housing Development Study (2015) and Plan aims to meet the full objectively assessed need for an additional 27,000 36,000 dwellings that is predicted to arise in Cheshire East over the 2010 – 2030 period. The Housing Development Study has used the Department for Communities and Local Government (CLG) 2012-based household projections as a ‘starting point’ and applied a 10-year migration trend. The Study also projected economic activity rates up to 2030 and assumed that there are no further falls in unemployment. It considered the evidence on market signals along with the need for affordable housing and for older people (including C2 bed spaces). It then sought to identify the appropriate balance – between working residents and the number of people working in the Borough – that is necessary to achieve jobs growth of around 31,000 (an</u> This need is based on forecasting work using the latest Government projections and also factors in the Council’s aspirations for employment led growth, which seeks to deliver additional housing to enable a rate of jobs growth that average of 0.4 0.7 % jobs growth a year). Such a balance requires both migration flows and commuting flows to be sustainable over the Plan period. Given that the aging population of the Borough is reducing the proportion of residents of working age, and the generally low local levels of unemployment, such an increase in jobs would create more in commuting unless, as is intended, housing is provided at a level to match the employment</p>

			<p>growth. This level of employment growth—and the expansion in economic output that it is likely to bring—are considered realistically attainable, given the inherent potential of the Borough to attract economic investment. These rates of employment and economic output growth are also consistent with Cheshire East's previous (and strong) long-term economic performance. Such an approach also accords with the central tenant of the NPPF—the presumption in favour of enabling sustainable development.</p>
SR 22	Planning for Growth – paragraph 8.9	61	<p>Suggested revision to paragraph as follows:</p> <p>The <u>CLG 2012-based household projections (period 2012-2037)</u> were used as the 'starting point' for Council has used projections and forecasting as a basis for determining the objectively assessed need for housing. This links in with the draft paragraphs 15 and 16 of the National Planning Practice Guidance which makes it clear for the first time that:</p> <p><i>"Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need". (PPG 2015, Paragraph 15)</i></p> <p><i><u>"The 2012-2037 Household Projections were published on the 27 February 2015, and are the most up to date estimate of future household growth"</u> (PPG 2015, Paragraph 16)</i></p>
SR 23	Planning for Growth – paragraph 8.10	62	<p>Suggested revision to paragraph as follows</p> <p><u>The Guidance advocates that the latest household projections should be used to calculate overall housing need. Having taken the CLG 2012-based projections as its 'starting point', the Housing Development Study tested alternative migration trends, concluding that a 10-year migration trend best represented long-term change. The Study also projected economic activity rates up to 2030, based on Census data for Cheshire East and Office for Budget Responsibility projections. It assumes that unemployment stays at its March 2015 level and makes allowances for vacancies, second homes and "double-jobbing" (people holding multiple jobs). The Study also considered the latest evidence on market signals (as required by Planning Practice Guidance). In doing so, it used Office for National Statistics area classification data and CLG Index of Multiple Deprivation data to identify areas with similar demographic and economic characteristics to Cheshire East. The market signals analysis compared Cheshire East to these areas - Cheshire West & Chester, the East Riding of Yorkshire, Wiltshire and North Somerset – and to England. The Study identified that, on the whole, market signals do not indicate any need for an upward adjustment to housing need: house price trends and affordability trends in Cheshire East are close to those for England and are typically in line with those for the comparator areas; average rents and increases in rents are broadly in line with England and the comparator areas;</u></p>

			<p><u>the proportion of households that are overcrowded is lower than in England (and most comparator areas) and rose more slowly during 2001-11 than in most of these other areas; and whilst the rate of development has been relatively low in recent years, it was higher than the England average for 2001-11. Nevertheless, there has been an increase in concealed families over the period 2001 – 11 which the objective assessment of housing need has addressed – and homelessness - by increasing projected household growth by 344 (an average of 17 per annum) over the Plan period (2010-2030). The Study identifies a total affordable housing need of a minimum of 7,100 dwellings (an average of 355 per annum), which is included in objective assessment of housing need of at least 36,000 dwellings.</u></p> <p>The interim 2011-based subnational household projections are the most recent, but only look as far ahead as 2021. The published projections suggest the total number of households in Cheshire East is expected to increase annually by an average of around 1,050 over the ten year period i.e. from around 159,600 to 170,000. The Council has undertaken demographic forecasting work based on these interim projections, continuing them forward to 2030 using the same assumptions as the official projections and using the 2021 household formation rates from these official projections. This results in an average annual increase in dwellings of 1,180 over the whole Plan period. Further details of this scenario and others that have been modelled, including the justification for projecting forward the household formation rates, can be found in the Council's Population Projections and Forecasts background paper (February 2014).</p>
SR 24	Planning for Growth – paragraph 8.11	62	<p>Suggested revision to paragraph as follows</p> <p><u>The Alignment of Economic, Employment and Housing Strategy Report concluded that net jobs growth of around 31,000 jobs would be ambitious yet realistic for the 20-year period (2010-2030); this represents a jobs growth rate of around 0.7% per annum. This is e scenario that models an annual average jobs growth rate of 0.4% equates to a net average increase of 1,365 dwellings per annum or around 27,300 overall, a labour supply increase of around 17,300 people and an increase of around 14,800 jobs to 2030. This level of employment growth is likely to result in economic output (Gross Value Added, or GVA) expanding by an average of around 2.4% a year (because of the contribution that productivity growth makes to GVA growth). These employment and GVA growth rates are considered realistically attainable, given the inherent potential of the Borough to attract economic investment, and they are also consistent with Cheshire East's previous (and strong) long-term economic performance; the Council's Local Plan Strategy and the economic growth vision of the Cheshire & Warrington Local Enterprise Partnership. For example, Office for National Statistics data suggest that, during the eleven years up to the start of the Plan period (i.e. 1999-2010), Cheshire East's GVA grew by an average of 2.0% a year in real (inflation-adjusted) terms (39)In this context, an economic output expansion of about 2.4% a year is ambitious, but achievable.</u></p>

SR 25	Planning for Growth – paragraph 8.12	62	<p><u>The Housing Development Study notes that, in meeting any shortfall in workers over the Plan period, there has to be an appropriate balance between migration flows and commuting flows, to ensure that both are sustainable over the long term. Based on the assumption that net in-migration will average 2,600 per annum over the 20 year Plan period (which is equivalent to the highest level recorded in any single year since 1991 and considerably greater than the 2001-11 average of around 1,700 per annum), net in-commuting would need to increase by an average of 400 commuters per annum over the same period. On this basis, net commuting would rise from 1,400 (at the time of the 2011 Census) to around 9,000 by 2030; to put this in context, the number of jobs located in Cheshire East is projected to rise by around 31,000, from 197,000 to 228,000 over the Plan period, so even in 2030 net commuting would account for less than 5% of the total projected jobs. Considering all of the evidence, the Housing Development Study has concluded that the objectively assessed need for housing in Cheshire East is 36,000 dwellings over the Plan period (2010 – 2030). It is also important to recognise that, as well as yielding extra population and workers, any increase in housing will also help to address market signals and increase the likely provision of affordable housing. The above suggests that the medium growth strategy of providing around an additional 1,350 dwellings per annum, identified in the Council's Issues and Options Paper, would best match the expected future household growth in Cheshire East and the Council's economic growth aspirations.</u></p>
SR 26	Planning for Growth – paragraph 8.13	62	<p>The outputs from <u>Housing Development Study</u> modelling work represent only one of the elements that have been considered by the Council in determining the level of housing growth shown in the Local Plan and considered appropriate for Cheshire East until 2030 <u>its housing requirement</u>. The Council has also considered the findings of the <u>Alignment of Economic, Employment and Housing Strategy Report (2015)</u>, <u>Strategic Housing Market Assessment (SHMA)</u>, the Strategic Housing Land Availability Assessment (SHLAA), the pre-recession levels of house building and other wider policy considerations before determining what the appropriate housing requirement is for Cheshire East.</p>
SR 27	Planning for Growth – paragraph 8.14	62	<p>Delete paragraph: The Strategic Housing Market Assessment (SHMA) 2010 and 2013 update confirms that Cheshire East is a high demand area, and that there is a need to maintain the delivery of a variety of dwelling types and sizes to reflect demand for a range of open market dwellings.</p>
SR 28	Planning for Growth – paragraph 8.15	62	<p>Suggested revision to paragraph as follows</p> <p>The SHMA 2013 update <u>Housing Development Study</u> identifies concludes that Cheshire East is an appropriate geography for planning purposes, over which to assess and meet housing requirements. The study also identifies-concludes that Cheshire East comprises several housing two functional sub- market areas that are substantially contained within the Borough. The functional market areas <u>suggested by the</u></p>

			<u>data to reflect the former Macclesfield Borough and a second sub-area reflecting the former Crewe and Nantwich and, Congleton and Macclesfield areas.</u>
SR 29	Planning for Growth – paragraph 8.16	62	<p>Delete paragraph:</p> <p>It also indicates that there is a net annual affordable housing need equivalent to an annual imbalance of 1,401 dwellings over its 5 year time horizon. It is important to state that this is a measure of the imbalance of affordable need relative to supply and is not a target for delivery of additional affordable homes.</p>
SR 30	Planning for Growth – paragraph 8.17	63	<p>Suggested revision to paragraph as follows</p> <p>Around 2,200 sites were considered as part of the Strategic Housing Land Availability Assessment (Update 31st March 2012). Of these approximately 1,600 sites were considered suitable for housing during the following 15 years. These 'suitable' sites could potentially provide a total of nearly 50,000 dwellings over the 15 year period, of which about 7,200 homes would be on brownfield sites with a further 4,800 on sites that are a mix of brownfield and greenfield land. This work demonstrates a theoretical capacity for new housing in the Borough. An updated Assessment will accompany the submission of this Plan to examination. In the meantime the Council has produced an updated 'Five Year Housing Land Supply Position Statement' with a base date of 31st December 2013. This has been produced for housing appeal purposes; it includes planning permissions granted up to that date but not the uncommitted sites included and proposed in this Plan. An updated assessment of housing permissions and commitments has been completed to a base date of 31 March 2015. Nevertheless the research done for the Position Statement This has been used to inform an a interim housing trajectory for the Plan period which does include the envisaged delivery timing of all the sites proposed in the Plan. The trajectory is reproduced in Appendix E.</p>
SR 31	Planning for Growth – paragraph 8.18	63	<p>Suggested revision to paragraph as follows:</p> <p>Using an overall housing need target of 36,000 27,000 dwellings for the Borough over the Plan period would equate to an average net increase of around 1,800 1,350 dwellings per annum. Setting this annual level to apply from 2010 would be a significant step change in the housing requirement for the area compared with past policy requirements. However this overall level of housing is considered necessary and appropriate to meet the Council and Government's growth agenda. In arriving at this total figure, consideration has been given to the capacity of the area to accommodate growth and an appropriate balance has been struck which minimises the impact on the environment, infrastructure and the Green Belt, whilst providing for objectively assessed needs. It is considered that a significantly higher growth</p>

			strategy for housing, to facilitate even greater economic growth, would be unsustainable in overall terms as it would have an unacceptable impact on the local environment, the intended role of the Green Belt and the cumulative capacity of local infrastructure.
SR 32	Planning for Growth – paragraph 8.19	63	<p>Suggested revision to paragraph as follows</p> <p>The overall basis of the Plan is to enable economic growth in Cheshire East. The local economy suffered, along with the rest of the country, during the recent recession. The annual rate of house building dipped to a low of less than 500 dwellings in 2010/11 compared to the annualised development plan target of 1,150 applicable at the time. This contraction in the house building industry is shown in starker terms if the new annualised average figure of 1,350 1,800 was to be applied immediately from 2010. Given the post-recession recovery needed by the house building industry, the historic Plan start date, the necessity to bring forward significant site-releasing infrastructure and the time required for the Plan's jobs led growth strategy to have effect, it is considered appropriate to have five year stepped up housing target figures. Such an approach should help avoid any diversion of development from the Potteries during the area's recovery from recession. The proposed first step target of 1,200 dwellings per annum for the 2010-15 period would still exceed the average annual increase in dwellings of 1,180 over the whole Plan period identified from the Government's projections, as detailed above, and represent an increase over the previous development plan. Successive 100 dwelling per annum step ups for the remaining three 5 year periods represent a realistic, ambitious and progressively increasing delivery of housing. The selection of land for residential development within the site allocations will need to take account of both the overall housing requirement and the need to redress past shortfalls in delivery since 2010.</p>
SR 33	Planning for Growth – paragraph 8.20	63	<p>As part of considering options to removing land from the Green Belt, collaboration working with neighbouring authorities has explored the extent to which such authorities could assist in meeting the Cheshire East's housing requirements. The outcome of those discussions is that none of these authorities are in such a position. However a request to assist High Peak Council has been received. That authority's area is highly constrained by land of high landscape value and steep topography even within those parts of the Borough that are not within the Peak District National Park. Cheshire East Council wants to avoid inappropriate development pressure on the National Park, an important tourism destination that is partly within the authority's own area. The Council also recognises that previous housing restraint policies have probably directed some residential development to High Peak. Associated with this are transport movements in the A6 corridor, which are causing severe traffic congestion that is likely to be further exacerbated by additional development. In view of these synergies between the two</p>

			authorities' areas, it is considered appropriate to provide for part of High Peak's housing requirement in Cheshire East. A modest 500 dwellings in the second half of the Plan period is proposed, an amount considered to be within the parameters of the medium growth strategy.
SR 34	Planning for Growth – Table 8.2 Housing Completions	64	<p>Amend Figures in table 8.2:</p> <p>Net completions 01/04/13 - 31/12<u>203/1413</u>: 497 <u>663</u></p> <p><u>Net completions 01/04/14 – 31/03/15 – 1,236</u></p> <p>Planning permissions at 31st December <u>March 2013-2015</u></p> <ul style="list-style-type: none"> • Site under construction – 2,291 <u>4,333</u> • Full Planning Permission – 1,806 <u>1,603</u> • Outline planning permission – 2,509 <u>5,262</u> • Subject to S.106 agreement – 2,150 <u>3,924</u> <p>Total completions and planning permissions – 40,906 <u>15,122</u></p> <p>Remaining (including 500 dwellings for High Peak) – 16,594</p> <p><u>Additional footnote added: The Planning Permissions at 31st March 2015 include 4775 dwellings on sites included within Strategic Sites allocations that fall in these categories. The Commitments column in Appendix A excludes any permissions on Strategic Sites to prevent double counting.</u></p>
SR 35	Planning for Growth – Vision for Key Service Centres	66	<p>Suggested revision to paragraph as follows:</p> <p>The Key Service Centres will see growth, with high quality homes and business premises provided to meet local needs, where smaller independent traders and tourism initiatives will continue to thrive and where all development will contribute to creating a strong sense of place.</p>
SR 36	Planning for Growth – Vision for Local Service Centres	66	<p>Suggested revision to paragraph as follows</p> <p>In the Local Service Centres, some modest growth in housing and employment will have taken place to meet locally arising objectively assessed needs, to reduce the level of out-commuting and to secure their continuing vitality. This may require small scale alterations to the Green Belt in some circumstances.</p>

SR 37	Planning for Growth – Policy PG 2- Settlement Hierarchy	67	<p>Suggested revision to Policy as follows:</p> <p>Local Service Centres</p> <p>In the Local Service Centres, small scale development to meet localised objectively assessed needs and priorities will be supported where they contribute to the creation and maintenance of sustainable communities.</p> <p>The Local Service Centres are Alderley Edge, Audlem, Bollington, Bunbury, Chelford, Disley, Goostrey, Haslington, Holmes Chapel, Mobberley, Prestbury, Shavington and Wrenbury.</p> <p>Other Settlements and Rural Areas</p> <p>In the interests of sustainable development <u>and the maintenance of local services</u>, growth and investment in the other settlements should be confined to <u>proportionate development at a scale commensurate with the function and character of the settlement and confined to locations well related to the existing built-up extent of the settlement.</u> small scale infill and the change of use or conversion of existing buildings in order to sustain local services. Affordable housing development of an appropriate scale on the edge of a rural settlement to meet a particular local need may be justified, although It may be appropriate for local needs can also to be met within larger settlements, dependent on location.</p>
SR 38	Planning for Growth – Paragraph 8.34	67	<p>Suggested revision to paragraph as follows:</p> <p>In the <u>other settlements and</u> rural areas, the Local Plan Strategy approach is to support an appropriate level of small scale infill development that reflects the function and character of individual villages. Small scale growth may be appropriate where it supports the creation of stronger local communities and where a clear local need <u>exists, which is not more appropriately met in a larger nearby settlement.</u> <u>Development will be restricted to locations well related to the built-up extent of these settlements. The identification of such sites will be achieved through the allocation of suitable sites and / or the designation of settlement boundaries</u> is addressed as part of the Site Allocations and Development Policies Development Plan Document and / or in Neighbourhood Plans, where these come forward. Elsewhere, in order to reduce unsustainable sporadic development, new housing will be strictly controlled. In the case of Goostrey which adjoins Holmes Chapel, a larger Local Service Centre, it is anticipated that development needs will largely be provided for in Holmes Chapel.</p>
SR 39	Planning for Growth	68	Suggested revision to paragraph as follows:

	– Paragraph 8.35		Notwithstanding the above settlement hierarchy, the Local Plan Strategy also includes the new North Cheshire Growth Village at Handforth East. This new village will be designed to the highest environmental standards, acting as best practice examples for future design and construction. This new village will become a Local Service Centre in the Consideration will be given to its position in the settlement hierarchy once it is built and will embody sustainable development principles including:
SR 40	Planning for Growth – Paragraph 8.37	68	Suggested revision to paragraph as follows: The Local Plan Strategy also includes Other Local Plan Strategy Sites at Wardle Employment Improvement Area and Alderley Park Opportunity Site. At Alderley Park Opportunity Site, an unidentified level of residential development may come forward where it is demonstrated to be necessary for the delivery of the life science park, in accordance with Local Plan Strategy Policy SC29.
SR 41	Planning for Growth – Paragraph 8.42	69	Delete paragraph: In addition, a new area of Green Belt will be defined adjacent to Crewe to prevent it merging with Nantwich and other surrounding settlements.
SR 42	Planning for Growth – Policy PG 3 – Green Belt	69	Point 5 of the Policy will be updated following the consideration of sites later in the examination process Delete point 7: 7. — A new area of Green Belt will be designated adjacent to Crewe to prevent its merger with Nantwich and other surrounding settlements. It will also link to the existing Green Belt to help maintain the strategic openness of the gap between Crewe and the Potteries. The Area of Search for this new area of Green Belt is shown on Figure 8.2. The detailed boundaries of this new area of Green Belt will be defined through the Site Allocations and Development Policies Document(42). Delete Footnote 42 For clarification, the saved Green Gap policy from the Borough of Crewe and Nantwich Local Plan will continue to operate (other than where specific sites are allocated in this Local Plan Strategy) until the detailed boundaries of the new Green Belt are defined in the Site Allocations and Development Policies Development Plan Document.

SR 43	Planning for Growth – Paragraph 8.43	70	As set out in Chapter 4 'The Case for Growth' and Policy PG 1 'Overall Development Strategy', and evidenced through the Strategic Housing Market Assessment Update (2013) <u>Housing Development Study (2015)</u> , and the Employment Land Review (2012) <u>and the Alignment of Economic, Employment and Housing Strategy Report (2015)</u> there are significant identified needs for market and affordable housing, as well as for new employment land provision within Cheshire East.
SR 44	Planning for Growth – Paragraph 8.46	71	Suggested revision to paragraph as follows: The Green Belt Assessment <u>Update (2015 2013)</u> has considered the contribution each parcel of Green Belt land adjoining settlement boundaries makes to the purposes of the Green Belt.
SR 45	Planning for Growth – Figure 8.1	72	Figure will be updated following the consideration of sites later in the examination process
SR 46	Planning for Growth – Paragraph 8.51	72	Remove paragraph Within the proposed area of search for a new Green Belt (shown in Figure 8.2), there are a number of neighbouring towns and villages fairly close to each other. As Crewe has grown throughout the 20th Century, erosion of the gaps between Crewe, Nantwich and a number of smaller settlements has caused settlements to merge into the urban area in some cases, and very narrow gaps to remain in other cases.
SR 47	Planning for Growth – Figure 8.2	73	Figure is to be removed.
SR 48	Planning for Growth – Paragraph 8.52	73	Delete paragraph: The identification of Crewe as a spatial priority for growth brings significant opportunities, but also some threats. As Crewe grows to fulfil its potential it will become increasingly important to maintain the distinctive identity of the other settlements within the area of search and to prevent them merging into a Greater Crewe urban area.
SR 49	Planning for Growth – Paragraph 8.53	74	Delete paragraph; As set out in the 'New Green Belt and Strategic Open Gaps' study, strong policy protection will be required to maintain the existing gaps between settlements that are at risk of coalescence resulting from the future growth of Crewe
SR 50	Planning for Growth – Paragraph 8.54	74	Delete paragraph: The detailed boundaries of the new area of Green Belt will be defined on the Adopted Policies Map; until that point the Green Gap boundaries, as defined in the saved policy of the Borough of Crewe & Nantwich

			Replacement Local Plan will remain in force, apart from where specific changes are proposed in this document.
SR 51	Planning for Growth – Paragraph 8.55	74	<p>Delete Paragraph:</p> <p>The detailed boundaries of the new area of Green Belt, when defined in the Site Allocations and Development Policies Document, will need to be compatible with the growth aspirations set out for Crewe in the 'All Change for Crewe' and 'High Growth City' programme. It will be important to ensure that the new Green Belt does not unduly restrict the future growth of Crewe and consideration will need to be given as to how the town might grow in the future. Consequently, there is likely to be the need to safeguard areas of land between the urban area and the inner limit of the Green Belt to meet potential future development needs.</p>
SR 52	Planning for Growth – Key Evidence	74	<p>Update as follows:</p> <ol style="list-style-type: none"> 1. Cheshire East Green Belt Assessment <u>Update</u> 2. New Green Belt and Strategic Open Gaps Study 3. Strategic Housing Market Assessment <u>Alignment of Economic, Employment and Housing Strategy Report</u> 4. Strategic Housing Market Assessment Update <u>Housing Development Study</u> 5. Employment Land Review
SR 53	Planning for Growth – Policy PG4 Safeguarded Land	74	<p>Point 5 of the Policy will be updated following the consideration of sites later in the examination process</p> <p>Suggested revision to point 6 as follows:</p> <p>In addition to these areas of Safeguarded Land listed; it may also be necessary to identify additional non-strategic areas of land to be safeguarded in the Site Allocations and Development Policies Document, which will include around 5 to 10 hectares to serve the longer-term development needs in Poynton.</p>
SR 54	Planning for Growth – Paragraph 8.59	75	Suggested revision to paragraph as follows :

			<p>The development needs beyond this plan period will be determined through future reviews of the Local Plan. To ensure that Green Belt boundaries will not need to be altered at the end of this Plan period, it is necessary to identify areas of Safeguarded Land. In the absence of guidance on the amount of land that should be Safeguarded, a balance is required that gives confidence on the permanence of the Green Belt boundary whilst minimising the impact on the Green Belt and making the most efficient use of land</p>
SR 55	Planning for Growth – Paragraph 8.60	75	<p>Suggested revision to paragraph as follows :</p> <p><u>Within the South Cheshire Green Belt area, the main settlements of Congleton and Alsager are located adjacent to, but beyond the Green Belt. There is a significant supply of potential non-Green Belt land in these areas and therefore no need to designate Safeguarded Land to ensure permanence of the South Cheshire Green Belt boundary. Within the North Cheshire Green Belt, the main settlements are inset within the Green Belt and do not have the same expansion options on non Green Belt land. It is therefore necessary to include areas of Safeguarded Land to make sure that the North Cheshire Green Belt boundaries will not need to be altered again at the end of the plan period. In the absence of guidance on the amount of land that should be Safeguarded, a balance has been struck between the need to ensure the permanence of the Green Belt boundary and the NPPF requirement to make the most efficient use of land.</u></p>
SR 56	Planning for Growth – Paragraph 8.61	75	<p>Suggested revision to paragraph as follows :</p> <p>There will be a number of further options to accommodate future development needs beyond the Plan period, which could include measure such as (not exhaustive):</p> <p>Recycling of land within the urban areas, including the re-use of under-used employment areas, which will become redundant over the lifetime of the Plan. For example, there may be opportunities around the former mills off London Road in Macclesfield where there could be potential for a new urban village development;</p> <p>Additional town centre and higher density development;</p> <p>Channelling development to areas within the inner boundary of the Green Belt (i.e. Greater Manchester and the Potteries conurbations);</p> <p>Channelling development to areas beyond the outer boundary of the Green Belt. It is anticipated that HS2 will bring extensive jobs and housing to Cheshire East post 2030. The full impact of HS2 on</p>

			<p>Cheshire East is unclear; however, it is likely that the HS2 project will prove decisive in supporting the case for significant growth and development to the south, in preference to the north of the borough. The likelihood is that this future development will be centred in and around Crewe, Alsager and Congleton.</p> <p><u>A number of Local Plans have indicated that a 15 year plan period, followed by 5-10 years worth of Safeguarded Land will ensure that the Green Belt boundary retains a degree of permanence. As Safeguarded Land is only required in the North Cheshire Green Belt, the development requirement for the northern sub-area in this plan period has been projected forward beyond 2030 to determine the amount of Safeguarded Land required.</u></p>
SR 57	Planning for Growth – New Paragraph 8.61a	75	<p>Suggested Insertion as follows:</p> <p><u>Consideration has been given to the likely availability of land beyond 2030. Whilst it is difficult to identify specific land that may become available so far into the future, there is a range of evidence to suggest that there will be a continued and reliable source of recycled and other land for development post 2030. There may also be other further options available to accommodate development including:</u></p> <ul style="list-style-type: none"> <u>• Channelling development to locations within the inner Green Belt boundary, with the opportunities arising from the renaissance of our adjacent conurbations;</u> <u>• Channelling development to locations beyond the outer edge of the Green Belt boundary in Cheshire East. It is anticipated that HS2 will prove decisive in supporting the case for significant future growth and development in the southern part of the Borough, centred around Crewe, Alsager, Congleton and Middlewich. As evidenced by the volume of sites submitted through the Local Plan process and Strategic Housing Land Availability Assessment, it is clear that there will continue to be a significant stock of potential development sites in areas beyond the Green Belt post 2030.</u>
SR 58	Planning for Growth – New Paragraph 8.61b	75	<p>Suggested Insertion as follows:</p> <p><u>Given the desire to protect the countryside and minimise the impact on the Green Belt, it is appropriate to provide only the minimum amount Safeguarded Land needed to make sure that Green Belt boundaries do not need to be altered again in the next plan period. Considering the potential options for accommodating development post 2030, it is considered that there are grounds for a modest reduction in the timescale for projecting forward needs, to provide for between 8-10 years of Safeguarded Land. Factors in relation to future housing densities have also been considered, including an ageing population, increased provision of smaller units and enabling higher densities through improved urban</u></p>

			<u>design. It is considered that there are sufficient grounds for assuming future housing densities of between 30 and 40 dwellings per hectare. A range of scenarios have been tested using the parameters on time period for projections and housing densities, which result in a requirement of between 155 ha and 244 ha of Safeguarded Land. Overdependence on any single influence is not appropriate given the timescales and variables involved, and a mid-point of 200 hectares is selected to take account of all factors concerned</u>
SR 59	Planning for Growth – Paragraph 8.62	75	<p>Suggested revision to paragraph as follows :</p> <p>At the end of the Plan period, the <u>continued supply of recycled and other land for development as well as the other options to accommodate development and the use of the identified Safeguarded Land if required, will be sufficient</u> utilisation of the above measures where appropriate, plus the use of the identified safeguarded land if required will be sufficient to ensure that the Green Belt boundary will not need to be reviewed again at this time.</p>
SR 60	Planning for Growth – Paragraph 8.63	76	<p>Delete paragraph as follows:</p> <p>Additional Safeguarded Land within the new area of Green Belt adjacent to Crewe will be defined in the Site Allocations and Development Policies document, alongside the detailed boundaries of the new Green Belt.</p>
SR 61	Planning for Growth – Figure 8.3	76	Figure will be updated following the consideration of sites later in the examination process
SR 62	Planning for Growth – Key Evidence	76	<p>Update as follows:</p> <ol style="list-style-type: none"> 1. National Planning Policy Framework 2. Cheshire East Green Belt Assessment <u>Update</u> 3. <u>Safeguarded Land Advice Note</u>
SR 63	Planning for Growth – New Planning for Growth – Paragraph 8.63a	77	<p>Insert text as follows:</p> <p><u>Maintaining and enhancing the character and separate identities of the Borough's towns and villages is a key priority of the Local Plan Strategy.</u></p>
SR 64	Planning for Growth	77	New Policy proposed as follows:

	– New Policy PG4a		<p><u>Strategic Green Gaps</u></p> <p><u>1. The areas between the following settlements are defined as Strategic Green Gaps:</u></p> <p><u>i. Willaston / Wistaston / Nantwich / Crewe;</u></p> <p><u>ii. Willaston / Rope / Shavington / Crewe;</u></p> <p><u>iii. Crewe / Shavington / Basford / Weston; and</u></p> <p><u>iv. Crewe / Haslington.</u></p> <p><u>2. These areas are shown on Figure 8.3a. The detailed boundaries of the Strategic Green Gaps will be defined through the Site Allocations and Development Policies document and shown on the Adopted Policies Map.</u></p> <p><u>3. The purposes of Strategic Green Gaps are to:</u></p> <p><u>i. Provide long-term protection against coalescence;</u></p> <p><u>ii. Protect the setting and separate identity of settlements; and</u></p> <p><u>iii. Retain the existing settlement pattern by maintaining the openness of land.</u></p> <p><u>4. Within Strategic Green Gaps, policy PG 5 (Open Countryside) will apply. In addition, planning permission will not be granted for the construction of new buildings or the change of use of existing buildings of land which would:</u></p> <p><u>i. Result in erosion of a physical gap between any of the settlements named in this policy; or</u></p> <p><u>ii. Adversely affect the visual character of the landscape.</u></p> <p><u>5. Exceptions to this policy will only be considered where it can be demonstrated that no suitable alternative location is available.</u></p>
SR 65	Planning for Growth – New para 8.63b	77	<p>Insert text as follows:</p> <p><u>Within the areas to the south, east and west of Crewe, there are a number of neighbouring towns and villages in close proximity to each other. As Crewe has grown throughout the 20th Century, erosion of the gaps between Crewe, Nantwich and a number of smaller settlements has caused settlements to merge into the urban area in some cases, and very narrow gaps to remain in other cases.</u></p>
SR 66	Planning for Growth	77	<p>Insert text as follows:</p>

	– New para 8.63c		<u>The identification of Crewe as a spatial priority for growth brings significant opportunities for this area, but also some challenges. As Crewe grows to fulfil its potential it will become increasingly important to maintain the distinctive identity of Nantwich and other nearby settlements and to prevent them from merging into a Greater Crewe urban area.</u>
SR 67	Planning for Growth – New para 8.63d	77	Insert text as follows: <u>As set out in the ‘New Green Belt and Strategic Open Gaps’ study, strong and strategic long-term policy protection is required to maintain the existing gaps between Crewe and Nantwich, and between Crewe and other settlements that are at risk of coalescence resulting from the future growth of Crewe.</u>
SR 68	Planning for Growth – New para 8.63e	77	Insert text as follows: <u>The detailed boundaries of the Strategic Green Gaps will be defined through the Site Allocations and Development Policies Document and shown on the Adopted Policies Map. Until that time, the Green Gap boundaries, as defined in the saved policy NE.4 of the Borough of Crewe and Nantwich Replacement Local Plan will remain in force, apart from where specific changes are proposed in this document through the allocation of Local Plan Strategy sites.</u>
SR 69	Planning for Growth – New Figure 8.3a		Insert new figure as follows:

			<p>© Crown copyright and database rights 2015, Ordnance Survey 100049045</p> <p>Legend</p> <ul style="list-style-type: none"> Existing Green Belt Borough Boundary Strategic Green Gap
SR 70	Planning for Growth – New paragraph 8.63f		<p>Insert new paragraph:</p> <p><u>The gaps identified in this policy are considered to be the strategic gaps required to prevent coalescence, primarily arising from the growth of Crewe. The Site Allocations and Development Policies document will consider whether there are further, more localised gaps that require additional policy protection through a Local Green Gaps policy.</u></p>
SR 71	Planning for Growth		<p>Insert new text as follows:</p>

	– New Key Evidence Section		<ol style="list-style-type: none"> 1. New Green Belt and Strategic Open Gap Study 2. Arup New Green Belt Policy Advice Note
SR 72	Planning for Growth – Policy PG5 Open Countryside	77	<p>Proposed revision to Policy PG5 as follows:</p> <p>Open Countryside</p> <ol style="list-style-type: none"> 1. The Open Countryside is defined as the area outside of any settlement with a defined settlement boundary. 2. Within the Open Countryside only development that is essential for the purposes of agriculture, forestry, outdoor recreation, public infrastructure, essential works undertaken by public service authorities or statutory undertakers, or for other uses appropriate to a rural area will be permitted. 3. Exceptions may be made: <ol style="list-style-type: none"> i. where there is the opportunity for the limited infilling in villages; the infill of a small gap with one or two dwellings in an otherwise built up frontage elsewhere ; limited affordable housing, in accordance with the criteria contained in Policy SC6 ‘ Rural Exceptions Housing for Local Needs’ or where the dwelling is exceptional in design and sustainable development terms; ii. for the re-use of existing rural buildings where the building is permanent, substantial and would not require extensive alteration, rebuilding or extension iii. for the replacement of an existing dwelling building by a new dwelling not materially larger than the dwelling it replaces iv. for extensions to existing dwellings where the extension is not disproportionate to the original dwelling v. for development that is essential for the expansion or redevelopment of an existing business v.vi. <u>For development that is essential for the conservation and enhancement of a heritage asset</u>
SR 73	Planning for Growth – Policy PG 6 Spatial Distribution	79	<p>Proposed revision to Policy PG6 as follows:</p> <p>Spatial Distribution of Development</p> <ol style="list-style-type: none"> 1. The Principal Towns are expected to accommodate development as shown: <ol style="list-style-type: none"> i. Crewe: in the order of 65 hectares of employment land and 7,700 <u>7,000</u> new homes; ii. Macclesfield: in the order of 20 <u>45</u> hectares of employment land and 3,500 <u>4,250</u> new homes; 2. The Key Service Centres are expected to accommodate development as shown: <ol style="list-style-type: none"> i. Alsager: in the order of 35 <u>40</u> hectares of employment land and 4,600 <u>2,000</u> new homes; ii. Congleton: in the order of 24 hectares of employment land and 3,500 <u>4,150</u> new homes;

			<p>iii. Handforth (including North Cheshire Growth Village): in the order of 40 <u>22</u> hectares of employment land and 450 <u>2,200</u> new homes;</p> <p>iv. Knutsford: in the order of 15 <u>40</u> hectares of employment land and 650 <u>950</u> new homes;</p> <p>v. Middlewich: in the order of 75 hectares of employment land and 4,600 <u>1,950</u> new homes;</p> <p>vi. Nantwich: in the order of 3 hectares of employment land and 4,900 <u>2,050</u> new homes;</p> <p>vii. Poynton: in the order of 3 <u>10</u> hectares of employment land and 200 <u>650</u> new homes;</p> <p>viii. Sandbach: in the order of 20 hectares of employment land and 2,200 <u>2,750</u> new homes;</p> <p>ix. Wilmslow: in the order of 8 <u>10</u> hectares of employment land and 400 <u>900</u> new homes;</p> <p>3. The New Settlement at North Cheshire Growth Village at Handforth East is expected to accommodate up to 12 hectares of new employment land and 1,850 new homes.</p> <p>4. The Employment Improvement Area at Wardle is expected to accommodate in the order of 61 hectares of employment land</p> <p>5.3. The Local Service Centres are expected to accommodate in the order of 5 <u>7</u> hectares of employment land and 2,500 <u>3,500</u> new homes.</p> <p>6.4. The Other Settlements and Rural Areas are expected to accommodate in the order of 69 <u>5</u> hectares of employment land (figure including the 61 hectare Employment Improvement Area at Wardle) and 2,000 <u>2,950</u> new homes (including Alderley Park).</p>
SR 74	Planning for Growth – Paragraph 8.74		<p>Suggested revision to paragraph as follows :</p> <p>The distribution of development between the various towns of the <u>Borough</u> is informed by the <u>Spatial Distribution Update Report</u>. This has taken into account the following considerations:</p> <ul style="list-style-type: none"> • Settlement Hierarchy • Various consultation stages including the Town Strategies, Development Strategy and Emerging Policy Principles • Green Belt designations • Known development opportunities including the Strategic Housing Land Availability Assessment • Infrastructure capacity • Environmental constraints • Broad sustainable distribution of development requirements
SR 75	Planning for Growth	80	Suggested revision to paragraph as follows :

	– Paragraph 8.76		"and are as amended by the sites detailed in this <u>Local Plan</u> Core Strategy document"
SR 76	Planning for Growth – Paragraph 8.79	80	Suggested revision to paragraph as follows The <u>Housing Development Study</u> Strategic Housing Market Assessment (SHMA) suggests that, on the basis of migration and , travel to work and other data, Cheshire East is an appropriate geography for planning purposes over which to assess and meet housing requirements and comprises two three functional housing <u>sub</u> -market areas: one is focused on the former Macclesfield district and exhibits strong interactions with Greater Manchester market; a the second is focused on the former Crewe & <u>Nantwich</u> and Congleton Nantwich districts and is largely self-contained with migration from North Staffordshire; the third is centred around Congleton, having. and has noticeable market interactions with North Staffordshire and Greater Manchester.
SR 77	Planning for Growth – Table 8.3	81	Amend title of new settlement: "North Cheshire Growth Village, <u>Handforth East</u> "

	Planning for Growth – Table 8.3	80	Amend table																													
<table><tr><th colspan="5">Table 8.3 Indicative Distribution of Development</th></tr><tr><th rowspan="2">Town</th><th colspan="2">New Homes</th><th colspan="2">Employment Land</th></tr><tr><th>Total 2010 to 2030</th><th>Average each year⁽⁴⁴⁾</th><th>Total 2010 to 2030</th><th>Average each year</th></tr><tr><td colspan="5">Principal Towns</td></tr><tr><td>Crewe</td><td><u>7,700</u> 7,000</td><td><u>385</u> 350</td><td><u>65ha</u></td><td><u>3.25ha</u></td></tr><tr><td>Macclesfield</td><td><u>4,250</u> 3,500</td><td><u>213</u> 175</td><td><u>20ha</u> 15ha</td><td><u>1ha</u> 0.75</td></tr></table>				Table 8.3 Indicative Distribution of Development					Town	New Homes		Employment Land		Total 2010 to 2030	Average each year ⁽⁴⁴⁾	Total 2010 to 2030	Average each year	Principal Towns					Crewe	<u>7,700</u> 7,000	<u>385</u> 350	<u>65ha</u>	<u>3.25ha</u>	Macclesfield	<u>4,250</u> 3,500	<u>213</u> 175	<u>20ha</u> 15ha	<u>1ha</u> 0.75
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Key Service Centres

Alsager	<u>2,000</u>	<u>100</u>	<u>40ha</u>	<u>2ha</u>
	1,600	80	35ha	1.75ha
Congleton	<u>4,150</u>	<u>208</u>	<u>24ha</u>	<u>1.20ha</u>
	3,500	175		
Handforth (including North Cheshire Growth Village)	<u>2,200</u>	<u>110</u>	<u>22ha</u>	<u>1.1ha</u>
	150	8	10	0.5ha
Knutsford	<u>950</u>	<u>48</u>	<u>15ha</u>	<u>0.75ha</u>
	650	33	10ha	0.5ha
Middlewich	<u>1,950</u>	<u>98</u>	<u>75ha</u>	<u>3.75ha</u>
	1,600	80		
Nantwich	<u>2,050</u>	<u>103</u>	<u>3ha</u>	<u>0.15ha</u>
	1,900	95		
Poynton	<u>650</u>	<u>33</u>	<u>10ha</u>	<u>0.5ha</u>
	200	10	3ha	0.15ha
Sandbach	<u>2750</u>	<u>138</u>	<u>20ha</u>	<u>1.00ha</u>
	2,200	110		
Wilmslow	<u>900</u>	<u>45</u>	<u>10ha</u>	<u>0.5ha</u>
	400	20	8ha	0.4ha

Local Plan Strategy: Suggested Revisions Log

			<table><tr><td colspan="5">Other Settlements</td></tr><tr><td rowspan="2">Local Service Centres</td><td><u>3,500</u></td><td><u>175</u></td><td><u>7ha</u></td><td><u>0.35ha</u></td></tr><tr><td>2,500</td><td>125</td><td>5ha</td><td>0.25</td></tr><tr><td rowspan="2">Other Settlements and Rural Areas (including Wardle Improvement Area)</td><td><u>2,950</u></td><td><u>148</u></td><td><u>69ha</u></td><td><u>3.45ha</u></td></tr><tr><td>2,000</td><td>100</td><td>5ha</td><td>0.25ha</td></tr></table>	Other Settlements					Local Service Centres	<u>3,500</u>	<u>175</u>	<u>7ha</u>	<u>0.35ha</u>	2,500	125	5ha	0.25	Other Settlements and Rural Areas (including Wardle Improvement Area)	<u>2,950</u>	<u>148</u>	<u>69ha</u>	<u>3.45ha</u>	2,000	100	5ha	0.25ha
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SR 78	Planning for Growth – Key Evidence	82	<p>Suggested Revision to key evidence as follows:</p> <ol style="list-style-type: none">Determining the Settlement HierarchyStrategic Housing Market Assessment Housing Development StudyStrategic Housing Land Availability Assessment																							

ANNEX D: HOUSING TECHNICAL ANNEX

1 Introduction

- 1.1 The National Planning Policy Framework (NPPF) requires Local Planning Authorities to “ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area” and “identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which meets household and population projections, taking account of migration and demographic change” (NPPF, paragraphs 47 and 159).
- 1.2 In his Interim Views [PSA017b] on the submitted Cheshire East Local Plan Strategy (LPS), the Inspector identified shortcomings with the Council’s original calculation of Objectively Assessed Need (OAN) and the overall housing requirement. These concerns related to:
- The failure to establish an appropriate **baseline figure** for objectively assessing housing need ([PS A017b], paragraph 4);
 - The assumptions made by the Council about household formation rates, migration and economic activity rates:
 - On **household formation**, the Inspector noted that “...CEC has assumed that household formation rates will stay constant after 2021...However, the PPG advises that household formation rates may have been suppressed historically by past under-supply and worsening affordability of housing...a partial return of household formation rates to longer term trends...could be considered...CEC has considered some alternative models which assume some growth in household formation after 2021; these may represent a more appropriate and robust basis on which to estimate future housing need” ([PS A017b], pp 42-43).
 - On **migration**, the Inspector commented that “...CEC uses short-term data for the period 2006/07 – 2009/10...By using figures from the last decade, the LPS is continuing the levels of migration associated with a period of economic recession and limited availability of new housing, rather than those associated with a more buoyant economy and more new housing” ([PS A017b], paragraph 44).

- On **economic activity rates**, he noted that “CEC has also made some unduly optimistic assumptions about increased economic activity of older people...Both the unduly pessimistic assumptions about job growth and the optimistic assumptions about future economic activity rates of older people have the effect of artificially depressing the need for new housing for employees. This is a high risk strategy which could result in the failure of the economic strategy of the plan at the expense of increased and less sustainable in-commuting” ([PS A017b], paragraph 50).
- Factoring in relevant evidence on **market signals and affordable housing**. The Inspector took the view that “There are shortcomings in the Council’s objective assessment of housing needs, both in terms of establishing an appropriate baseline figure and failing to specifically take into account and quantify all relevant economic and housing factors, including market signals and the need for affordable housing.” ([PSA017b], paragraph 4).
- **Economic and housing strategy**. The Inspector highlighted the need for economic strategy to be suitably ambitious, suitably aligned with the wider strategies of the Council and other agencies, and for housing provision to be sufficient to achieve this economic ambition. He noted that “The economic strategy is unduly pessimistic, including the assumptions about economic growth and jobs growth, and does not seem to fully reflect the proposals and initiatives of other agencies and the extent of site allocations proposed in the submitted plan. There is a serious mismatch between the economic strategy and the housing strategy of the submitted plan, particularly in the constrained relationship between the proposed level of jobs and the amount of new housing...The proposed level of future housing provision seems inadequate to ensure the success of the overall economic, employment and housing strategy.” ([PS A017b], paragraph 4)

1.3 Overall the Inspector concluded that further work was needed to assess the OAN and define the overall Housing Requirement for the area in a way which explicitly addressed all the relevant factors outlined in the NPPF and Planning Practice Guidance (PPG), using assumptions which are robust and realistic, and which better reflect the inter-relationship with the Plan’s economic strategy.

1.4 Following receipt of the Inspector’s Interim Views and the Inspector’s decision to suspend the LPS Examination, the Council commissioned consultants, Opinion Research Services (ORS), to undertake a Housing Development Study (HDS) and establish the OAN for housing in response to the Inspector’s

Interim Views alongside other technical evidence based documents being produced during the suspension period.

- 1.5 The OAN for housing calculates, as far as possible, the additional needs for housing for the relevant housing market area that takes no account of policy constraints. That is not, however, to say that it is devoid of any value judgements, as a prediction of what will happen in the future requires a series of informed assessments that must be made at every step. The only certainty about the future is that it is uncertain. As the PPG observes “establishing future need for housing is not an exact science” (PPG, para. 014¹). Professional judgement is required at a number of stages in the derivation of the OAN in terms of the time period used to project migration flows, the household formation rates to be applied to population projections, the response to wider market signals and many other judgements required to arrive at the OAN.
- 1.6 **ORS concluded that the headline OAN for Housing in Cheshire East is 36,000 dwellings over the 20-year period 2010-30, equivalent to an average of 1,800 dwellings per annum** (ORS Housing Development Study June 2015, Executive Summary, para. 2). The OAN figure includes an allowance for older people’s accommodation and also takes account of all of the evidence in relation to demographic trends, market signals and economic development needs and also factors in considerations such as Student Accommodation, Gypsy and Traveller provision, vacancies and second homes in the overall calculation. This approach is fully compliant with both the NPPF and PPG, is mindful of Planning Inspector Decisions and High Court Judgements, as well as emerging good practice including the technical advice note about OAN and Housing Targets published by the Planning Advisory Service (PAS) in June 2014.
- 1.7 **The Housing Requirement for Cheshire East as set out in the suggested revisions for Policy PG1 is 36,000 homes between 2010 and 2030. This is considered to accommodate the full OAN and is aligned with the Vision and Strategic Priorities set out in the LPS.**
- 1.8 This technical annex responds to the evidence base provided from the ORS Housing Development Study. It sets out key considerations in the definition of the OAN for housing and the translation of the OAN into a Housing Requirement for Cheshire East Council, whilst responding to the policy considerations in the LPS.

¹ Reference ID: 2a-014-20140306

2 Strategic Priorities and Policy Objectives

- 2.1 The LPS sets out a number of Strategic Priorities in order to deliver the overall Vision for Cheshire East, frame the strategic policies and measure the overall performance of the LPS (LPS, pp 49-51). Strategic Priority 2 of the LPS (Creating Sustainable Communities) sets out the Plan's approach to meeting the needs of its local communities and providing for the infrastructure required to create sustainable and stronger communities, whilst retaining the Borough's character and distinctiveness.
- 2.2 Strategic Priority 2 states that the LPS will create sustainable communities by providing for the full, objectively assessed housing needs for the Borough to support economic growth and to meet housing needs. It goes on to state that the focus for development will be in sustainable locations (such as Principal Towns, Key Service Centres), ensuring an appropriate mix of house types, sizes and tenures including affordable housing to meet the Borough's needs and enabling vulnerable and older people to live independently for longer.
- 2.3 The Housing Requirement set out in the suggested revisions to Policy PG1 will accommodate the OAN of the Borough and is therefore considered to align with Strategic Priority 2 of the LPS in meeting the full OAN for the Borough (including affordable housing need). Alongside PG 2 (Settlement Hierarchy), it will focus development on sustainable locations (such as Principal Towns, Key Service Centres). In addition, the inclusion of housing for older people within the OAN calculation and Housing Requirement (encompassing both Use Classes C2 and C3) is aligned to Strategic Priority 2 in providing for older people's accommodation.

3 Housing Market Area

- 3.1 Cheshire East Council represents a single housing market area with recognition of two local sub-market areas – one in the north and the other in the south of the Borough (HDS, paragraphs 2.29 – 2.30). This is consistent with the Inspector's Interim Views, which acknowledge that Cheshire East is a reasonably self-contained area, subject to recognising the links with Cheshire West & Chester, Greater Manchester and north Staffordshire, together with the existence of more localised housing market sub-areas within Cheshire East ([PSA017b], paragraph 18).

4 DCLG Household Projections

- 4.1 The 'starting point' estimate for OAN has been the Department of Communities and Local Government (CLG) 2012-based household projections. ORS have reviewed and assessed the household projections and

used a scenario based on 10 year migration trends as it was felt that this gives the most reliable and appropriate long-term demographic projection for establishing housing need (HDS, paragraphs 3.12 and 3.66).

5 Older Person's Accommodation (C2 uses)

- 5.1 In line with the approach of paragraph 37 of the PPG, the OAN and Housing Requirement includes an allowance for older person's accommodation which accounts for 2,185 units over the Plan Period (HDS, paras. 3.50 – 3.52). This figure incorporates accommodation for older people which may include facilities within Planning Use Class C2 as well as conventional dwellings (Use Class C3).
- 5.2 The delivery of older person's accommodation is linked to the Vulnerable and Older Persons Strategy [PSB026]. The Vulnerable and Older Persons Strategy includes a number of outcomes to be met through the Strategy, including:
- Outcome 1: 'People are supported to live in their own homes independently for longer.'
 - Outcome 2: 'People can receive the support they need in a wide range of specialist, supported accommodation within the Borough.'
 - Outcome 3: 'People are able to make informed choices about the accommodation, care, and support options within Cheshire East.'
- 5.3 The approach of the Council in the delivery of the Vulnerable and Older Person's Strategy, and the work of the Council's strategic planning, housing, health and social care teams will ensure a joined up approach to the delivery of older people's accommodation. The provision for older people's accommodation is aligned with Strategic Priority 2(iii) of the LPS in enabling vulnerable and older people to live independently for longer.
- 5.4 The Council acknowledges that current and future accommodation demand for older people within Cheshire East, can only be made through directly working with stakeholders and Registered Providers of Social Housing (hereinafter "Registered Providers"), in the commissioning of schemes funded through a number of sources. The Council's Strategic Housing Service is working with Registered Providers to ensure the delivery of affordable housing programmes for older people within Cheshire East to meet local needs, including meeting the needs through general, supported and specialised housing.

- 5.5 Whilst the Homes and Communities Agency requires local commissioners and housing groups to identify housing needs, investment through the Affordable Housing Capital Funding is available for housing types specifically for older people such as Sheltered Housing, Extra Care Housing, Shared Supported Houses and Retirement Villages.
- 5.6 In addition, the Homes and Communities Agency administer the Care and Support Specialised Housing Fund on behalf of the Department of Health, and has recently entered into Phase 2 for 2015/16. The fund is specifically for older people, with care and support needs for adults with disabilities or mental health problems.
- 5.7 The Vulnerable and Older Persons Housing Strategy [PSB026] advocates that older people should be supported to remain in their home as long as possible, through required aids and adaptations and assisted living Telecare technology. In addition, Policy SC4 (Residential Mix) in the LPS (point 2) acknowledges the importance of demonstrating that housing proposals can be capable of meeting, and adapting to, the long term needs of older residents.

6 Market Signals

- 6.1 The Housing Development Study has considered the latest evidence on market signals. The market signals analysis compared Cheshire East to a number of Local Authority areas that are considered most comparable in terms of ONS classification data together with data from the CLG Index of Multiple Deprivation. The market signals analysis compared Cheshire East to these areas - Cheshire West & Chester, the East Riding of Yorkshire, Wiltshire and North Somerset – and to England (HDS, para. 5.34).
- 6.2 The Study identified that, on the whole, market signals do not indicate any need for an upward adjustment to housing need: house price, rents and affordability trends in Cheshire East are typically in line with or better than the equivalent rates for England the comparator areas; and whilst the rate of development has been relatively low in recent years, over the last decade it was higher than the England average. The proportion of households that are overcrowded is lower than in England (and most comparator areas) and rose more slowly during 2001-11 than in most of these other areas; and whilst the rate of development has been relatively low in recent years, it was higher than the England average for 2001-11 (HDS, paragraphs 4.20 and 5.54).
- 6.3 Nevertheless, there has been an increase in concealed families over the period 2001-11. The objective assessment of housing need has addressed this – and homelessness - by increasing projected household growth by 344

(an average of 17 per annum) over the Plan period (2010-2030) (HDS, paragraph 5.55)

7 Affordable Housing Need

- 7.1 Having undertaken an assessment of current unmet housing need and projected future housing need, the Housing Development Study has identified a total affordable housing need of a minimum of 7,100 dwellings (an average of 355 per annum), which is included in the objective assessment of housing need of 36,000 dwellings (HDS, paragraph 4.100).
- 7.2 The delivery of affordable housing in Cheshire East (2009/10 to 2014/15) is set out in Figure 1 below:

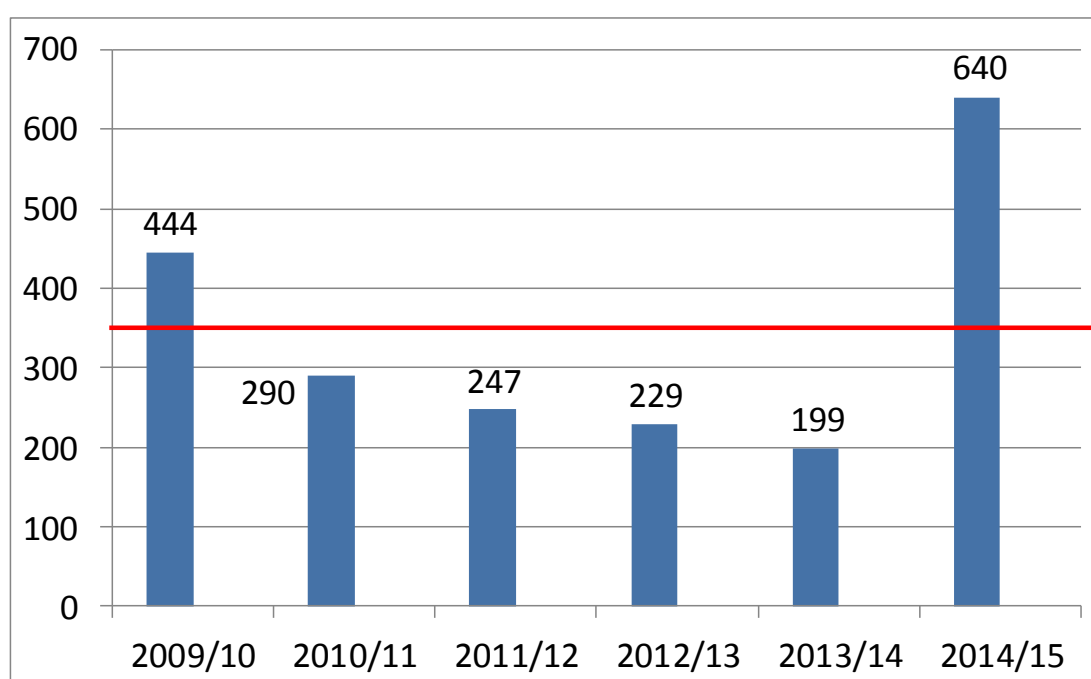


Figure 1: Affordable Housing Delivery, Source: Strategic Housing Service

- 7.3 The Housing Development Study recognises the conclusions of the Draft Core Strategy and CIL Viability Study [BE042], prepared in 2013, which concluded that Greenfield residential development is generally viable with the Council's 30% affordable housing target whereas brownfield residential development maybe viable only if lower levels of affordable housing are permitted at planning application stage. On this basis, it should be viable to deliver the affordable housing need identified (HDS, paragraph 5.28 – 5.29). In addition, any uplift in OAN in response to other factors, such as the

alignment of the OAN to jobs would also help address affordable housing need in the Borough.

- 7.4 The housing requirement set out in the suggested revisions to Policy PG1 will respond to the affordable housing need identified in the ORS report and is considered to align with Strategic Priority 2.(ii) in ensuring that there is an appropriate mix of house types, sizes and tenures including the level of affordable housing that is necessary to meet the Borough's needs.
- 7.5 The key factors in the affordable housing calculation are the assessment of current unmet need for affordable housing and the projected need for future affordable housing in line with the requirements of the NPPF and PPG. ORS have noted the importance of properly considering the needs of newly forming against migrating households and also that different household groups have different propensities of forming in response to housing need. It is also the case that while some households fall into need each year, other households will climb out of need at the same time and this needs to be fully factored in to any calculation of affordable housing need. The impact of addressing all of these factors is to reduce the affordable housing need calculated for Cheshire East from the figure previously reflected in the 2013 arc⁴ SHMA Update [BE001]. It is also important to note that the 2013 SHMA Update was produced prior to the publication of the PPG.
- 7.6 For the avoidance of doubt, the ORS Housing Development Study replaces the conclusions set out in the SHMA 2013 Update, although the data derived from the 2009 survey, reflected in the SHMA, is used for illustrative purposes as part of the evidence base informing the preparation of and justifying the LPS.

8 Links to Employment

- 8.1 The Alignment of Economic, Employment and Housing Strategy Report (2015) concluded that net jobs growth of around 31,000 would be ambitious yet realistic for the 20-year Plan period (2010-2030); this represents a jobs growth rate that averages around 0.7% per annum. This is consistent with Cheshire East's previous long-term economic performance (average jobs growth rates of 0.8% per annum for 1998-2008 and 0.6% per annum for 2009-13), the Council's LPS and the economic growth vision [BE128] of the Cheshire & Warrington Local Enterprise Partnership [BE124]².

² Whilst the SEP does not provide a geographical breakdown of the 70,000 jobs ambition, Cheshire East's current share of Cheshire and Warrington's total employment (39%) suggests a Cheshire East contribution of 29,000 net additional jobs by 2030 to the 70,000 total. The 31,000 net additional jobs proposed by Cheshire East meets this implied overall contribution.

- 8.2 The HDS has considered employment trends and how the projected growth of the economically active population fits with the projected future changes in job numbers. The study notes that, in meeting any shortfall in workers over the Plan period, there has to be an appropriate balance between migration flows and commuting flows, to ensure that both are sustainable over the long term. The Study identified a potential range for the OAN from 1,466 dwellings per annum, where all of the adjustment for additional workers is met through additional net inward commuting, to 1,894 dwellings per annum, where all of the adjustment is met through additional net inward migration.
- 8.3 An increase in jobs within the Borough has potential to attract migrants into the area from other parts of the UK, but also to influence the working preferences of existing residents. As the quality and quantity of employment increases, so the need to seek work outside of the area will also diminish. Accordingly, an adjustment in the proportion of out commuting can be anticipated as more residents find work locally. This should be expected as generally speaking it is easier to move jobs than it is to move house. On balance and following more detailed analysis regarding the balance and realism of future migration and commuting patterns, the figure of 1,800 dwellings per annum is considered to be the viable OAN for Cheshire East (HDS, paragraph 5.93 – 5.103).
- 8.4 Paragraph 018 of the PPG ³ states:
- “Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems”.*
- 8.5 Paragraph 18 of PPG represents part of the calculation of OAN and requires professional judgement to be applied. The HDS concludes that, given the unprecedented levels of net inward migration that would be required to meet the projected shortfall of economically active population through migration alone, there need to be changes to both migration and commuting flows, to ensure that both are sustainable over the longer term (HDS, paragraphs 5.87-5.92).

³ Reference ID: 2a-018-20140306

- 8.6 The LPS Vision (LPS, page 47, paragraph 3) refers to new development being directed to the Principal Towns of Crewe and Macclesfield to support regeneration priorities, and to the Key Service Centres of the Borough which provide a good range of services and facilities. This is reflected as a theme running through the strategic priorities of the LPS, for example Strategic Priorities 2 and 4 in reducing the need to travel and also the policy context in the LPS Settlement Hierarchy, Spatial Distribution, Planning for Sustainable Development and Connectivity policies. It has also been an influencing factor on site selection. The LPS also includes key infrastructure schemes referenced in policies CO1 (Sustainable Travel and Transport) and CO2 (Enabling Business Growth through Transport Infrastructure) to improve accessibility and sustainable transport modes across the Borough to minimise unsustainable commuting patterns.

9 Drawing the evidence together - From OAN to Housing Requirement

- 9.1 The PPG advises that in arriving at a policy position, a range of considerations will need to be taken into account. This includes the overall assessment of need; the available capacity of residential land and the comparative environmental impact of utilising this land alongside delivery rates, market conditions and wider infrastructure in place and required to sustainably accommodate housing and jobs.

10 Sustainability Appraisal / HRA screening

- 10.1 The LPS Sustainability Appraisal Addendum has considered five overall growth options in the Borough over the plan period. Options 1 to 3 reflected the options previously advanced in the preparation of the LPS. Option 4 reflected the OAN derived as an outcome of the HDS and Option 5 represented a figure above that of the identified OAN. The table below summarises the assessment of alternatives and the selection of growth options:

Strategic Options Considered and Appraised	Reasons for Progressing or Rejecting the Option in Plan Making
Option 1: 22,000 dwellings (1,100 dpa) and 351ha of employment land	Option 1 was not progressed because of concerns that it would not meet the objectively assessed needs for housing and employment and would not make sufficient provision for growth. It would also not respond to the Inspector's Interim views, in particular, that the economic strategy is unduly pessimistic and the future housing provision is inadequate to ensure the success of the overall economic, employment and housing strategy.

Option 2: 27,000 dwellings (1,350 dpa) and 351ha of employment land	Option 2 was not progressed because of concerns that it would not meet the objectively assessed needs for housing and employment and would not make sufficient provision for growth. It would also not respond to the Inspector's Interim views in particular that the economic strategy is unduly pessimistic and the future housing provision is inadequate to ensure the success of the overall economic, employment and housing strategy.
Option 3: 32,000 dwellings (1,600 dpa) and 351ha of employment land	Option 3 was not progressed because of concerns that it would not meet the objectively assessed needs for housing and employment in the Borough. In addition, it would not provide sufficient workers to meet the projected jobs growth rate in the Borough of 0.7%.
Option 4: 36,000 dwellings (1,800 dpa) and 378ha of employment land	Option 4 is being progressed as the Housing Requirement for Cheshire East as it meets the objective assessment of housing need identified by the Housing Development Study 2015. This includes the objectively assessed need for affordable housing and is aligned to the economic objectives of the Council. The migration assumptions reflected in this option match the highest level recorded in any single year since 1991 in Cheshire East and are therefore considered ambitious but achievable.
Option 5: 38,000 dwellings (1,900 dpa) and 378ha of employment land	Option 5 was not progressed as the Housing Development Study 2015 as the balance of commuting and migration was considered less likely to be achieved. In particular, it identified that there would be no change in commuting patterns and the year on year net inward migration levels necessary to achieve this would be significantly higher than anything previously experienced in Cheshire East and are therefore less likely to be sustained over the whole plan period.

- 10.2 The Habitat Regulations Assessment screening acknowledged that the suggested Housing Requirement of 36,000 dwellings is unlikely to result in any additional impacts on European designated sites over and above the impacts assessed through the Habitats Regulations Assessment work undertaken to support the LPS [SD004], however, the magnitude and significance of identified impacts could potentially differ, depending on how any increase is distributed [Section 3, HRA Appraisal of Suggested Revisions – Planning for Growth].

11 National and Sub-Regional context

- 11.1 In terms of the national context, the Housing Development Study identified a housing need of 253,400 for England (taking account of 2012 Household Projections, adjusting for long-term migration and market signals whilst taking account of vacant and second homes). This figure represents a 1.1% increase in the current dwelling stock each year and would require current housebuilding to increase by 89% (based on dwelling starts in 2013-14).
- 11.2 Development industry campaigners (such as Homes for Britain) in the 2015 election campaign supported a position to build at least 245,000 homes to be built in England every year; a figure derived from the 2004 Barker Review. The Conservative Manifesto in 2015 set out an ambition to build 200,000 new starter homes. It is clear that the 253,400 exceeds these aspirations so any further increase in housing numbers at a local level (such as adjustments for affordable housing or to provide extra workers) must be considered in this context.
- 11.3 The Housing Requirement as set out in the draft suggested revisions for Policy PG1 is 36,000 dwellings. This accommodates the full OAN derived by the Housing Development Study in line with Strategic Priority 2 of the LPS. The Cheshire East OAN represents a 1.1% increase in dwelling stock each year (equal to the England average). In addition, 36,000 dwellings significantly contributes to the delivery of the Vision set out in the Strategic Economic Plan for Cheshire and Warrington which is for the Cheshire and Warrington sub-region's population to grow by 100,000, the creation of 75,000 new jobs and the provision of 70,000 new homes by 2030 ([BE124, Section 3]⁴.
- 11.4 Whilst the SEP does not provide a geographical breakdown of the 70,000, Cheshire East's current share of Cheshire and Warrington's total dwellings

⁴ The Adopted Cheshire West and Chester Local Plan (part 1) states that the Plan will deliver at least 22,000 new homes by 2030. The Warrington Core Strategy has had elements of its housing policies removed from its Adopted Local Plan, which proposed 10,500 new homes up to 2027. Warrington Borough Council is in the process of reviewing their overall housing requirement in response to this.

(41%)⁵ suggests a Cheshire East contribution of 29,000 to the net additional dwellings by 2030 to the 70,000 total dwellings ambition. The 36,000 housing requirement suggested by Cheshire East will meet this implied overall contribution.

12 Duty to Co-operate

- 12.1 The Inspector was satisfied that preparation of the Submitted Local Plan had met the legal requirements of the Duty to Co-operate. However, it is good and essential planning practice to continue the process of ensuring proper account is taken of any arising cross boundary strategic issues. This is especially so in circumstances when changes are to be proposed to the Plan that could have wider than Plan area impacts.
- 12.2 A full summary of the collaborative working that has taken place during the suspension period is set out elsewhere in the Report of Evidence. Briefly in relation to housing issues this collaboration encompassed rounds of face to face meetings with our neighbouring authorities covering each of the main suspension evidence gathering work streams and a joint liaison meeting to which all neighbouring planning authorities were invited.
- 12.3 The latter meeting concentrated on the potential wider impacts of accommodating more growth in Cheshire East particularly in terms of envisaged cross boundary migration and commuting flows – significant factors underlying the growth assumptions. This meeting was followed up with a letter sent to each authority asking for them to:
- raise any outstanding queries on the evidence work,
 - confirm that they could not provide sites to meet any of Cheshire East's development requirements; and
 - set out any cross boundary strategic concerns.

13 Policy Constraints

- 13.1 A further consideration is whether there are any policy factors that act as a constraint on the delivery of OAN for housing. The NPPF sets out the national advice at paragraph 14:

"Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*

⁵ Table Q418EW (Dwellings), 2011 Census, ONS.

- *specific policies in this Framework indicate development should be restricted.⁹*

13.2 Footnote 9 to paragraph 14 of the NPPF, identifies examples of the policies that operate as a constraint on development:

"For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion."

13.3 Some of these designations feature significantly in the policy framework for the Borough. The table below sets out the scale of just three of these:

Area of Cheshire East	1166 sq km
Green Belt	407.4 sq km
National Park	88.2 sqkm
SSSI (outside the areas above)	8.1 sq km
Total of 3 areas above	503.7 sq km

13.4 This table illustrates that some 43% of Cheshire East is covered by these three principal designations. (It should be noted that whilst the National Park is a separate planning authority, OAN is calculated for the Borough as a whole.) Whilst a sizeable area remains unaffected by any of these designations, the very fact that well over 40% of the Borough is constrained in this way, inevitably impacts on the scale and location of development that is appropriate.

13.5 Taking account of the Green Belt alone, this represents a significant factor in the future growth of towns in the north of the Borough, partly as the existing Green Belt boundary is drawn extremely tightly. Some alteration of the Green Belt is proposed in order to ensure the sustainable development of these settlements. However, a careful balance needs to be employed so as not to place excessive demands on Green Belt land, contrary to framework policy.

13.6 It is considered that the OAN for housing can be met in full without compromising the objectives of the framework. However, the significant influence of acknowledged constraints within the Borough weighs against a policy approach which sought to elevate the housing requirement significantly above full OAN.

14 Supply Capacity

- 14.1 There is also a need to assess whether there are reasonable prospects that the OAN can be delivered within the plan period. In this regard it is helpful to consider recent patterns of housing developments. The outset of the plan period was still dominated by recession in the housing industry. Furthermore, the Regional Spatial Strategy set a target of 1150 homes pa and this remained as the housing requirement until its revocation in May 2013. Accordingly in the early years of the plan period housing completions were significantly below the OAN of 1800 homes pa.

	2010/11	2011/12	2012/13	2013/14
Housing completions ⁶	464	535	654	663

- 14.2 However prospects for improving housing completions are now rather better. Since the base date of the submitted plan (31 December 2013) planning permissions have continued to be granted in sustainable locations. When these are added to the sites / allocations already set out in the Submitted Plan a total figure of 32,062 dwellings have already been identified as of 31 March 2015. This is before any consideration of the fresh evidence is made.
- 14.3 In excess of 11,800 units (net)⁷ have been approved since 2012 and this figure is continuing to rise throughout 2015. These approvals represent locations where development is deemed to be sustainable (in line with NPPF para. 14) by the LPA
- Around 1,700 units (gross) of the 11,800 units have been approved on appeal over the last 18 months, some on Open Countryside and Green Gap allocated land;
 - Since the turn of 2015, there has been the approval of around 2,000 (net) units, a small number of which were also allowed on appeal;
 - Completions for the past year have risen markedly (2014/15) to 1236 units (net).
- 14.4 This suggests that capacity within the housing industry is recovering from recession and that there is the prospect for home building to rise in coming years.

⁶ Examination Library Document References: **BE 026, BE 040, BE 139, BE 140 – Various AMRs**

⁷ This figure takes consideration of Reserved Matters application and Extensions of Time so sites may feature more than once in a small number of cases.

14.5 Furthermore, the process of 'Plan making' in Cheshire East also has the opportunity to identify further land for housing. Development plans are made up of a number of different elements and will consist of three key documents:

- The LPS which sets out the vision, spatial strategy and strategic priorities for Cheshire East up to 2030. It also contains strategic sites / strategic locations for further development
- The Site Allocations and Development Management Policies Document (SADPD) which will allocate the remaining sites proposed for future development and provide detailed policies to be used for new development across the Borough. This will build on the framework for growth set out in the LPS.
- The Waste document, which will set out policies for dealing with waste and identify specific policies for waste management facilities.

14.6 Alongside the Local Plan process, Neighbourhood Plans provide communities with the opportunity to prepare Plans for their area in conformity with the Local Plan and will form part of the mechanisms whereby the strategic requirements can be promptly and effectively implemented.

14.7 As such, the LPS represents the first stage in the overall Local Plan for Cheshire East. The SADPD will follow the LPS and will allocate the remaining sites proposed for future development, alongside the Neighbourhood Planning process.

- Finally, there are a number of other initiatives and factors that suggest that over the plan period as a whole the rate of house building can be improved: There has been the grant of funding by DCLG to progress Local Development Orders (LDOs) on Town Centre sites in Macclesfield, which have the potential to deliver around 300 units between them;
- Development of a Brownfield Toolkit to work with developers to seek to unlock important development sites across the Borough for residential uses;
- The Council has its own development arm (Engine of the North) and is also actively exploring options for an arms-length housing company to directly build new homes and

- The current SHLAA⁸ identifies some 50,000 potential units which are perceived to be on deliverable SHLAA sites, with delivery over the next 15 years. It must be noted though, that this quantum of 'suitable' and 'deliverable' housing land will be closer to 25,000 new dwellings ([PS B006b], paragraph 7.8).

14.8 Therefore, given that housing completions in the first years of the plan period have lagged significantly behind the revised OAN, there is a clear need for the rate of home building to rise. This requires a proactive response from policy makers – and also all areas of the industry. However, as set out above, at the present time there are a number of factors that suggest that 36,000 homes (including C2) can be delivered over the plan period as a whole. This in turn suggests that the Housing requirement should match the OAN figure.

15 Conclusion

15.1 The suggested revisions set out in Policy PG1 of the LPS show that the Housing Requirement for Cheshire East is 36,000 dwellings over the Plan period. This figure is considered to align with the provisions of the existing LPS and will achieve its Strategic Priorities and overall Vision.

15.2 As highlighted by the above considerations and context, the achievement of the overall Housing Requirement over the Plan period is ambitious but considered to be achievable / deliverable through the delivery of the Site Allocations Development Plan Document, Neighbourhood Plans and continued planning permissions in sustainable locations.

15.3 In response to the Inspector's Interim Views, the Housing Development Study (2015) and Alignment of Economic, Employment and Housing Strategy Report (2015) set out:

- an appropriate baseline figure for objectively assessing housing need;
- revised assumptions – reflecting the Inspector's concerns - about household formation, migration and economic activity rates;
- an assessment of the relevant evidence on market signals and affordable housing, and the implications for objectively assessed housing need;

⁸ [BE005] SHLAA (base date 31 March 2012)

- how the new recommended Local Plan approach involves a suitably ambitious economic strategy, and properly aligns economic strategy and housing strategy.

15.4 The Council contends that the suggested revisions to Policy PG1 are therefore:

- **Positively prepared**, in that Policy PG1 sets out a Housing Requirement which meets the overall OAN for Housing in Cheshire East over the Plan period;
- **Justified** by proportionate evidence within the Housing Development Study (2015) and the Alignment of Economic, Employment and Housing Strategy Report (2015), which is robust, reliable and up-to-date;
- **Consistent with national policy** by setting out a housing requirement which is consistent with national policy by fully meeting the Objective Assessment of Housing Need identified for Cheshire East.

APPENDIX 1 ANNEX E

Safeguarded Land Technical Annex

1 Introduction

- 1.1 This Safeguarded Land Technical Annex sets out the approach taken to the provision of safeguarded land. It provides a clear justification for the amount of safeguarded land required, based on projecting forward development requirements from the current plan period.

2 Overview of Inspector's Interim Views

- 2.1 There is some evidence to justify the release of the overall amount of safeguarded land, being partly based on the potential amount of land that may be required for development beyond the current plan period.
- 2.2 Earlier versions of the Local Plan Strategy included a much larger amount of safeguarded land (260 ha compared to the 130 ha included in the submitted version).
- 2.3 CEC provided a range of options to accommodate future development needs (rather than forecast development requirements post 2030) but he considered that these options would apply equally to the current plan period, as well as in the longer term.
- 2.4 The Green Belt Assessment did not always support the release of the selected sites and that the criteria for making further safeguarded designations at Site Allocations stage was not clearly set out.
- 2.5 His overall conclusion in relation to safeguarded land is set out in his Interim Views (¶89):

“Although the identification of Safeguarded Land would ensure that Green Belt boundaries would not need to be altered at the end of the current plan period, some further justification about the scale of Safeguarded Land proposed and the release of particular sites, both in the LPS and Site Allocations Local Plan, is needed before the approach could be considered sound”.

3 Reason for Safeguarding Land

- 3.1 The provisions for designating safeguarded land are set out in the National Planning Policy Framework. As set out in NPPF ¶79, one of the essential characteristics of Green Belts are their permanence.
- 3.2 Under NPPF ¶83, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long

term, so that they should be capable of enduring beyond the plan period.

- 3.3 Finally, NPPF ¶85 requires that, when defining Green Belt boundaries, authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer term development needs stretching way beyond the plan period.
- 3.4 It is the requirement not to alter Green Belt boundaries again at the end of the plan period (2030) that means it is necessary to identify safeguarded land.
- 3.5 In the North Cheshire Green Belt, there are a number of settlements inset within the Green Belt that are tightly-bounded by the Green Belt and are unable to meet their development needs without making changes to the Green Belt boundary (in this plan period to 2030). The exceptional circumstances to justify alterations to the Green Belt boundary are identified to be the need to allocate sufficient land for market and affordable housing and employment development, combined with the significant adverse consequences of not doing so, particularly since it is not practicable to fully meet the development needs of the area without amending Green Belt boundaries.
- 3.6 Sites will be allocated in the current Local Plan to meets the needs arising during this plan period (2010-2030). Without a good indication of the availability of non-Green Belt sites beyond 2030, the Council could not be sure that the Green Belt boundary designated now would endure throughout the next plan period (assumed for this purpose to be 2030-2045). The safeguarded land may not be needed to meet development needs in the next plan period, for a variety of reasons. For example, the objectively assessed needs may decrease after 2030, building densities may increase, or the availability of urban land may increase. However, the safeguarded land will be available, if needed, as a buffer to ensure that Green Belt boundaries will not need to be reviewed again until the end of the next plan period (2045) at the very earliest.
- 3.7 The development pattern in the South Cheshire Green Belt is very different. The main towns (Congleton and Alsager) are located adjacent to, but beyond the Green Belt. As they are not surrounded by Green Belt, these towns retain the ability to grow in other directions. The only inset settlements are small villages (below the level of Local Service Centres in the Settlement Hierarchy) whose needs could be met in the nearby towns. Consequently, the exceptional circumstances related to inability to accommodate development needs do not apply in the South Cheshire Green Belt. Any alteration to Green Belt boundaries in the current Local Plan would be based on identified site-specific exceptional circumstances.

- 3.8 Therefore, the Council can be satisfied that, for the South Cheshire Green Belt, there will be a sufficient pool of non-Green Belt sites available for development post 2030 and there is no requirement to identify safeguarded land in the South Cheshire Green Belt.

4 Overview of Arup Critical Friend Advice

- 4.1 Ove Arup & Partners were commissioned by the Council to advise on the proposed calculation of safeguarded land within the Local Plan Strategy.
- 4.2 Arup were asked to look at the approach to safeguarded land within the submitted Local Plan Strategy and compare that with national guidance and best practice elsewhere. They were further tasked with advising on the correct approach to adopt, following the Inspector's interim views.
- 4.3 In particular recommendations were sought on the specific calculation of the quantum of safeguarded land. For the avoidance of doubt, the site-specific location of any safeguarded land was excluded from this advice.
- 4.4 The Arup advice note (included at the end of this Technical Annex as Sub-Annex E) recommends a method to identify a quantum of safeguarded land based on 'longer term development needs' using objectively assessed need (or using the housing and employment requirements proposed in the Local Plan Strategy).
- 4.5 A number of Local Authorities have indicated that a 15-year plan period, followed by 5-10 years' worth of safeguarded land should ensure that the Green Belt boundary retains a degree of permanence. The arbitrary nature of the level of safeguarded land relates to the uncertainty in the extrapolation of existing objectively assessed need, the availability of windfall sites / brownfield land and the volatility of development pressures.
- 4.6 Projecting objectively assessed need whilst accounting for the recycling rate of brownfield land and the existing rate of delivery on windfall sites, offers an estimate of the longer term development needs of the District. Whether sufficient safeguarded land is identified for 5 or 10 years beyond the plan period will depend on three factors:
- The likely availability of deliverable and developable sites in the urban form;
 - The abundance of windfall sites across the plan period; and
 - The volatility of development pressures across the plan period.

5 Arup Recommended Approach for Cheshire East

5.1 The Arup note recommends CEC pursue the option to project forward the objectively assessed need for a period of 10 years determined following the level of brownfield recycling and reliability of windfall sites.

5.2 Applying a two-stage approach, CEC will therefore need to:

Stage 1: Identify the level of brownfield recycling and windfall sites across the whole borough via the existing evidence base. The results of Stage 1 will impact how far forward the projections should go, for example, if the level of recycling/windfall sites is high, CEC could reduce the period of projections down from 10 to 5 years.

Stage 2: Project objectively assessed need¹ (OAN) for 10 years beyond the plan period (dependent on Stage 1). Whilst it would be usual to project forward the OAN for the whole Borough, it may be appropriate for CEC to consider the objectively assessed needs across the northern part of the Borough by projecting the OAN within the northern sub market area. This is because it is only the towns in the northern sub market area that are inset within the Green Belt. For this approach to be appropriate, CEC would need to be satisfied that they are able to demonstrate a sufficient supply of land for the south of the Borough, outside of the Green Belt. This could involve consideration of potential sites in the SHLAA.

6 Future Needs

6.1 As the Planning Practice Guidance (PPG) observes², establishing future need for housing within the plan period itself is 'not an exact science'. Accordingly, the anticipation of future needs beyond the plan period are similarly fraught with multiple variables.

6.2 As a consequence, the Council advocates projecting forward the current identified needs for new homes and jobs. The revised OAN set out in the Housing Development Report marks a significant increase in housing from previous totals within the past Regional Spatial Strategy (1,150 per year) and Structure Plans (500 - 1,050 per year). Taking a long term view therefore, whilst some may argue for higher numbers, in a historical context, current numbers are positioned well above the average.

6.3 Equally, in terms of employment, the work by Ekosgen recommends that employment land commensurate with a 0.7% rate of growth should

¹ CEC will need to determine whether to use objectively assessed housing and employment needs or to use the housing and employment requirements proposed in the Local Plan Strategy if these differ from OAN figures.

² Reference ID: 2a-015-20140306

be identified. This aligns employment land with a long term rate of growth. Once again, in a historical context these totals should be viewed as supporting healthy optimism of future take up and needs.

- 6.4 Although the projecting forward of current development needs beyond 2030 is relatively simplistic, it is considered to be the most robust approach. The only alternative would be to try and make a separate estimate of needs for the period 2030-2045. Given the timescales involved, it is considered this would neither be accurate nor realistic.
- 6.5 The Borough-wide objectively-assessed need for development is 36,000 net additional dwellings³ and 378 hectares of employment land.⁴ Given the large numbers of 'deliverable' and 'developable' sites in the SHLAA, the extensive sites submitted to the Local Plan process and the edge of settlement potential identified through the Assessment of the Urban Potential of the Principal Towns; Key Service Centres and Local Service Centres and Possible Development Sites Adjacent to the Settlements work, it can be demonstrated that there will be sufficient land available in non-Green Belt areas post 2030 to meet the potential needs arising in those non-Green Belt areas. In addition (as set out above), there is no requirement to safeguard land in the South Cheshire Green Belt.
- 6.6 Consequently, it is argued that it is only appropriate to safeguard land in the North Cheshire Green Belt to allow for potential future needs arising from within that northern area of the Borough. In other words, it will not be appropriate to designate safeguarded within the area covered by the North Cheshire Green Belt to allow for potential future needs arising in other areas of the Borough.
- 6.7 As such, it will be appropriate to project forward the needs arising from the northern sub-area (as defined in the Housing Development Study) to determine the quantum of safeguarded land, rather than projecting forward the needs of the Borough as a whole.
- 6.8 The Spatial Distribution Update (Recommended Option 6) takes the Borough-wide objectively assessed needs for development and sets out the requirements for housing and employment in each area. It is therefore considered appropriate to use these housing and employment land requirements for the northern sub market area when projecting forward needs.
- 6.9 Consequently, it is proposed that the Council therefore adopts a calculation of land based on the recommended approach set out by Arup in their advice note and involves projecting forward the current

³ ORS Cheshire East Housing Development Study 2015

⁴ Ekosgen Alignment of Economic, Employment and Housing Strategy 2015

housing and employment requirement for the northern sub-area for a further period beyond 2030.

7 Time Period for Projections

- 7.1 The amount of safeguarded land must be sufficient to ensure that Green Belt boundaries do not need to be amended again until 2045 at the very earliest. This time period has been chosen as the base date as guidance indicates that 15 years is the usual minimum time period for a Local Plan and is 15 years beyond the current plan period end date of 2030.
- 7.2 This does not mean that CEC must identify sufficient safeguarded land to meet the full 15 years of future projected development requirements, as inevitably, there will be a number of other sources of land suitable for development such as infill, brownfield and other windfall opportunities that will be available to make up the difference. We must be confident that these infill, brownfield and other windfall opportunities, when combined with the safeguarded land could accommodate the full 15 years of projected development requirements.
- 7.3 The starting point for Arup's recommendation is that the amount of safeguarded land should be sufficient to meet 10 years of future projected development requirements. If the Council can determine that there is a high level of brownfield recycling and windfall sites and these are likely to be a continued reliable source in the future, then it may be possible to reduce the amount of safeguarded land to be sufficient to meet 5 years of future projected requirements.
- 7.4 Providing safeguarded land to meet fewer years of projected development requirements implies that there will be more reliance on other sources of land (as the end date of 2045 remains fixed).
- 7.5 Accordingly, the Council has considered the likely sources of land supply that might apply after 2030. Once again, many variables potentially apply to such future development, but given that land is a finite resource, this is to some extent easier to predict. There are various sources to give an indication of potential land supply beyond 2030. These cannot simply be added up as this would result in 'double-counting' but they do indicate a range of potential sources of land.
- 7.6 **Over-provision of housing land in this plan period.** There is a current backlog of housing completions, which will be amplified as a result of the increased housing provision figure backdated to 2010. In this plan period it is proposed to provide sufficient land to be sure of meeting the housing requirement of 36,000 net additional dwellings. This will include a modest buffer to assist with short term deliverability and to ensure that the full 36,000 are provided by 2030. This suggests that (as with the submitted plan), slightly more land than is required to meet the identified housing requirement may need to be allocated

within the Local Plan Strategy and the Site Allocations and Development Policies documents.

- 7.7 There are two outcomes from this to consider in relation to safeguarded land:
- 1) The extra land assists with deliverability and enables the full 36,000 dwellings to be delivered by 2030. In this case, there is likely to remain a residual amount of land at the end of the plan period (theoretically equal to the amount that is 'overprovided' now). In this case, it is argued that it is reasonable to assume that this land will be available for development in the next plan period.
 - 2) If all allocated land is fully-developed during this plan period and in excess of 36,000 dwellings are delivered by 2030, it would be argued that overprovision against need in this plan period will reduce development requirements by an equivalent amount in the next plan period.
- 7.8 Within the context of the overall requirements post-2030, any surplus may well be modest, but would nonetheless contribute to needs in the next plan period.
- 7.9 **Urban Potential Study Findings.** The Assessment of Urban Potential work looked at potential development sites in the urban areas. Within the settlements inset within the North Cheshire Green Belt, it found that there are sites with potential for development of 648 dwellings during the current plan period. It also found that there are sites that could accommodate 1,958 net additional dwellings which do not have potential for development during the current plan period. In the majority of cases, sites were discounted because they are currently in use. This means that there is currently not the evidence to suggest that they will come forward in this plan period, but they may well come forward for development post 2030.
- 7.10 Whilst it cannot be certain that sites 1,958 homes will all come forward, this figure does suggest that it is possible that the rate of brownfield recycling could increase in the future.
- 7.11 **Windfall / Completions on Non-Allocated Sites.** Windfall sites are defined in the NPPF as being:
- "Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available"*
- 7.12 Whilst the number of 'true' windfalls is difficult to quantify (due to the various sources of information that indicate that sites are available including the SHLAA and submissions to the Local Plan), it could be

argued that we do not know the availability of any sites post 2030. Therefore, any development on a site that is not allocated in a plan would be windfall for the purposes of this exercise.

- 7.13 Within the former Macclesfield Borough, there have been an average of 257 net completions per year on non-allocated sites since 2002. Due to issues with double-counting, these 'completions on non allocated sites' can not be added to other sources. Even if this rate of 257 completions per year on non-allocated land continued beyond 2030, it might be difficult to regard this as a 'high' figure to justify reducing the amount of safeguarded land.
- 7.14 Whilst the numbers are not necessarily high, the proportion of completions on non allocated sites is high (86.7%) suggesting that recycling of land has played an important role in housing delivery.
- 7.15 **Cheshire East SHLAA.** The total number potential units on 'Deliverable' and 'Developable' Non Green Belt SHLAA sites in the former Macclesfield Borough is 1,427. If including the 'Not Currently Developable' sites (but still excluding 'Not Suitable' sites, this increases to 2,489
- 7.16 Again, this points to a level of provision post-2030 but not a 'high' level to justify significant reduction of the level of safeguarded land.
- 7.17 **Brownfield Local Development Orders.** Macclesfield is the location of one of the national brownfield LDO pilots currently being sponsored by the Department for Communities and Local Government. It is anticipated that by the 2020s, Brownfield LDOs will be widespread. Consequently, their impact will start to be felt within the current plan period, but perhaps particularly so in the following decades.
- 7.18 **Other Ways of Meeting Future Needs.** Whilst making predictions on planning issues beyond 2030 is very difficult, there are likely to be a number of further options available to accommodate development requirements. These may include:
- Further recycling of land within the urban areas (as set out above);
 - Channelling development to locations within the inner Green Belt boundary, with the opportunities arising from the renaissance of our adjacent conurbations;
 - Channelling development to locations beyond the outer edge of the Green Belt boundary in Cheshire East. It is anticipated that HS2 will prove decisive in supporting the case for significant future growth and development in the southern part of the Borough, centred around Crewe, Alsager, Congleton and Middlewich. As evidenced by the volume of sites submitted

through the Local Plan process and SHLAA, it is clear that there will continue to be a significant stock of potential development sites in areas beyond the Green Belt post 2030.

7.19 **Overall Conclusions in Relation to Time Period for Projections.**

Taking the above points together, it is considered that there are sufficient grounds to make a modest reduction in the 10-year timescale, as advocated by Arup. Consequently, the Council has tested assumptions based on a Safeguarded Land total for 8, 9 and 10 years, respectively.

8 **Housing Densities**

8.1 Finally, the Council has also considered the future density of development. The safeguarded land calculation is partly based on the number of houses that may need to be provided in the future (by projecting forward current requirements) but the amount of safeguarded land is expressed in hectares. Therefore, there is a need to make an assumption regarding the average density at which new housing would be delivered in the event that the safeguarded land was required for this purpose in the future.

8.2 The SHLAA and LPS make general assumptions that 30 dwellings per hectare (dph) is a reasonable average development density, unless site specific information indicates otherwise. There is no national guidance in respect of using 30 dph, but it is considered a reasonable (and possibly conservative) assumption as it is at the lower end of the range previously advocated under the old guidance in Planning Policy Statement 3, and having regard to local circumstances which are addressed below.

8.3 As the housing market has emerged from deep recession, densities have if anything fallen slightly in recent years, with a shift to more family housing and with fewer flats and apartments constructed. However, in terms of the totality of housing need, there are factors that point to rather higher densities in future, which are now considered.

8.4 **Ageing Population.** There is a broad-based policy objective to ensure that older and vulnerable people remain living independently in their own homes for as long as possible. Whilst classically this may be associated with bungalows (a lower density form of development), more commonly in terms of new build now it is other forms of level access accommodation. For the most part these are built considerably in excess of 30 dph. As the demography of the Borough ages, so a higher proportion of this type of accommodation can be anticipated in the future.

8.5 **Housing Mix.** In order to meet the needs of all of the population, it is appropriate that a mix of housing be provided. This suggests a return to the building smaller units – either starter homes or apartments to sit

alongside conventional 3 or 4 bedroomed housing. In a more balanced market there is more opportunity for greater variety of housing than has been the case in recent years.

- 8.6 **Urban Design.** The NPPF already emphasises the importance of good design throughout the planning process (paragraph 56). This is starting to translate into more innovative designs, some of which are being constructed at higher densities. The emergence of modern vernacular represents one sector of this trend, whilst the replication of older traditions is another. Both however are capable of building at higher densities than conventional estate housing.
- 8.7 **Finite Land Resource.** The NPPF recognises the role that the planning system has in terms of conserving valued landscapes, soils, ecology and the best agricultural land (paragraph 109 – 112). Land is a finite resource and Cheshire East enjoys a combination of good farmland and a number of national designations. Green Belt itself is not to be surrendered lightly, given its importance (NPPF ¶83). These factors will remain and potentially be exacerbated into the future – therefore suggesting that land will need to be used judiciously as we head into the middle of the century.
- 8.8 **Conclusions in Relation to Housing Densities.** There is a growing recognition of the benefits of higher-density developments, particularly given the national challenge in significantly boosting the supply of new housing, whilst protecting the countryside and making the best use of land.
- 8.9 Higher density housing can:
- Make better use of scarce land resources;
 - Make more efficient use of existing infrastructure;
 - Reduce the need for travel by providing local amenities; and
 - Reduce the reliance on car transport by providing a focus for walking, cycling and public transport networks.
- 8.10 Taking all the above points together, it is considered there are sufficient grounds to factor in a modest increase in the standard 30 dph assumption in the safeguarded land calculation. Consequently, the Council has tested assumptions based on average housing densities of 30 dph, 35 dph and 40 dph respectively.

9 Safeguarded Land Calculation

- 9.1 The housing and employment land requirement for the northern sub-area for the current plan period can be determined from the Spatial Distribution Update report (Recommended Option 6) by summing the

requirements for those settlements within the northern sub-area and adding an apportionment for Local Service Centres and rural areas (for which the figures are expressed on a Borough-wide basis).

9.2 For the purposes of calculating the amount of Safeguarded Land, the requirements for Local Service Centres and rural areas in the northern sub-area have been apportioned using:

- The proportion of the total population of Local Service Centres residing in northern sub-area Local Service Centres; and
- The proportion of the rural population residing in the northern sub-area.

9.3 This gives a total requirement (during the current plan period) for 12,109 net additional dwellings and 83.6 ha of employment land within the northern sub-area. This equates to an annual average provision of 605 net additional dwellings and 4.2 ha of employment land.

9.4 To project this forward and calculate the amount of Safeguarded Land, it is necessary to convert the annual housing requirement into a land requirement by dividing it by the average density (30 dph – 40 dph tested) and adding this to the annual employment land requirement. This gives the total annual land requirement.

9.5 This total annual land requirement is then multiplied by time period for projections (8 – 10 years tested) to calculate the amount of Safeguarded Land required.

9.6 Based on the starting point of 10 years' worth of Safeguarded Land and housing delivered at an average of 30 dph, the amount of Safeguarded Land required would be 244 ha. Conversely, a reduction to 8 years combined with a density assumption of 40 dph results in a requirement for a total of 155 ha of Safeguarded Land.

9.7 The Council has tested a series of scenarios between these parameters:

	30 dph	35 dph	40 dph
10 year projection	244 ha	215 ha	193ha
9 year projection	219 ha	193 ha	174 ha
8 year projection	195 ha	172 ha	155 ha

9.8 It is suggested that overdependence on any single influence is unwise, given the variables involved. Consequently, it is suggested that a mid-point of 200 ha be adopted that takes account of all of the factors concerned. This represents a balanced approach which gives confidence that Green Belt boundaries will not need to be altered again at the end of the plan period, whilst minimising the impact on the Green Belt.

- 9.9 This approach is not any more definitive about the likely variables – for to do so might render a calculation with a spurious level of fine gained accuracy. Instead it is suggested that a broader strategic view of the issue be taken. However, for the purposes of comparison, 200 hectares of safeguarded land equates to 9 years of safeguarding at an average density of 34 dwellings per hectare.

10 Safeguarded Sites

- 10.1 The approach to calculating the required amount of safeguarded land makes no consideration of potential sites.
- 10.2 Potential Safeguarded Sites will be considered through the Site Selection work currently underway, which is informed by the Green Belt Assessment Update 2015 as well as all other evidence including the Sustainability Appraisal.

Sub-Annex E: Arup Critical Friend Advice – Safeguarded Land

Cheshire East Borough Council
Critical Friend Advice
Safeguarded Land

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Ove Arup & Partners Ltd
6th Floor 3 Piccadilly Place
Manchester M1 3BN
United Kingdom
www.arup.com

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Contents

	Page
1 Introduction	1
1.1 Critical friend advice	1
1.2 Green Belt in Cheshire East	1
2 Existing Cheshire East Council Safeguarded Land Policy	2
3 Review of Inspector's Interim Views	4
4 Policy, Guidance and Best Practice	4
4.1 City of York Legal Review	10
5 Proposed Method	12
5.1 Responding to the Inspectors concerns	15

1 Introduction

1.1 Critical friend advice

Arup has been commissioned by Cheshire East Council (CEC) to give critical friend advice on an appropriate methodology and justification for determining the amount of safeguarded land required for the Local Plan.

The purpose of this advice note is to set out a sound method to determine the amount of safeguarded land taking account of relevant national planning policy and guidance; best practice advice and approaches taken by other local authorities. The recommended approach should take into consideration and propose a method in response to the Inspector's interim views. The note should consider the appropriate timeframe for safeguarding and whether some form of flexibility should be factored in when determining the quantum of safeguarded land.

1.2 Green Belt in Cheshire East

Cheshire East has 40,630 hectares of land designated as Green Belt, located in the northern and eastern parts of the borough. Figure 1 shows the extent of the Green Belt, and the north / south split between Green Belt and non-Green Belt areas. There are two areas of safeguarded land within Cheshire East taken forward from the replacement local plans, these are currently consented for development and are not considered for safeguarding in the Local Plan Strategy (2014).

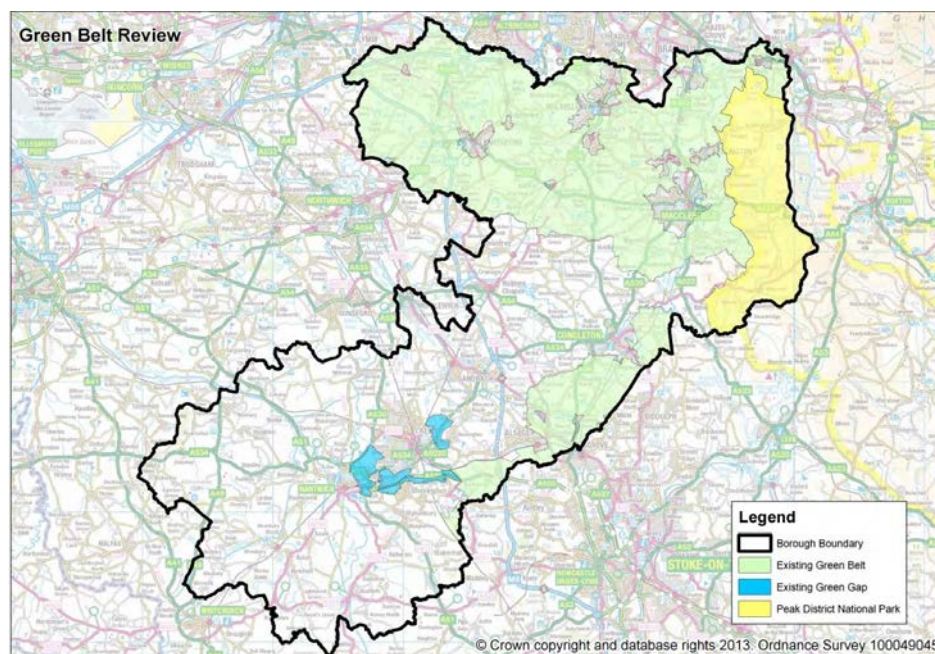


Figure 1 Map showing areas of Green Belt and Green Gap within Cheshire East¹.

¹ Cheshire East Green Belt Assessment (September 2013).

It is important to understand the characteristics of the Green Belt in Cheshire East, as local factors relating to the distribution of Green Belt across the borough will need to be taken into account in the policy response to safeguarded land.

2 Existing Cheshire East Council Safeguarded Land Policy

Policy PG 4 of the Local Plan Strategy (2014) relating to safeguarded land emphasises the requirement to identify safeguarded land in order to meet longer-term developments needs beyond the Local Plan period. Parts 1-4 of the Policy reiterate the principles set out in paragraph 85 of the National Planning Policy Framework (NPPF).

Part 5 of Policy PG 4 proposes the following areas of Safeguarded Land within Cheshire East:

Site	Size (hectares)
Site CS 31 (Safeguarded) 'Lyme Green, Macclesfield'	17.9 hectares
Site CS 32 (Safeguarded) 'South West Macclesfield'	45.4 hectares
Site CS 33 (Safeguarded) 'North West Knutsford'	25.1 hectares
Site CS 34 (Safeguarded) 'North Cheshire Growth Village, Handforth East'	19.8 hectares
optionSite CS 35 (Safeguarded) 'Prestbury Road, Wilmslow'	14.5 hectares
Site CS 36 (Safeguarded) 'West of Upcast Lane, Wilmslow'	7.4 hectares
Total amount of Safeguarded Land	130.1 hectares

The safeguarded land identified is not proposed for development within the plan period but may be required post 2030 if a future review of the plan identifies further development needs.

Paragraph 15.41 of the Local Plan Strategy (2014) identifies that safeguarded land is required around the larger settlements that are inset into the Green Belt: Macclesfield, Handforth, Poynton and Wilmslow. Given that there is currently no safeguarded land around Poynton, Part 6 of Policy PG 4 notes that further areas of non-strategic land to be safeguarded may need to be identified in the Site Allocations and Development Policies Document. This will include around 5-10 hectares to serve Poynton. The policy does not justify the reasoning behind this amount and states that more detailed investigations on this will be carried out during the preparation of the Site Allocations and Development Policies Document.

Paragraph 8.6 setting out the justification for Policy PG 4 states:

“In the absence of guidance on the amount of land that should be safeguarded, a balance has been struck between the need to ensure the permanence of the Green Belt boundary and the NPPF requirement to make the most efficient use of land.”

As set out in the ‘Hearing Statement: Matter 6’ and the Council’s Response to Inspector’s Question, this balance has been shaped by previous versions of the Local Plan, namely the Pre-Submission Core Strategy which projected forward development requirements for land in the Green Belt, for a further 20 year plan period (until 2050). This resulted in 260 hectares of safeguarded land. David Rutley MP put a question to the House of Commons debate on 24th October on the issue and the Planning Minister Nick Boles commented that there was no requirement under the Localism Act 2011, the NPPF, or any other Government planning policy to plan beyond 15 years. This statement, combined with consultation responses led the Council to conclude that planning for development until 2050 was an overly-cautious approach. The Council revised their approach and were satisfied that the identified 130 hectares of safeguarded land was sufficient to ensure that Green Belt boundaries will not need to be altered again in 2030.

Cheshire East Council deemed it inappropriate to forecast development requirements beyond 2030 and instead set out a number of measures which could be used beyond the plan period in order to accommodate development requirements. This is set out at paragraph 8.61 of the Local Plan and includes:

- Recycling of land within the urban areas;
- Additional town centre and higher-density development; and
- Channelling development to areas beyond the outer boundary of the Green Belt.

In addition to the 130ha of safeguarded land, the Council highlights that the Local Plan Strategy identifies more land for housing and employment than is required to meet objectively assessed needs during the plan period thus it is envisaged that the remaining amount of allocated land can be taken forwards into the next plan period, providing additional flexibility.

3 Review of Inspector's Interim Views

The Inspector published his interim views on the Legal Compliance and Soundness of the submitted Cheshire East Local Plan on 12th November 2014 and provided subsequent clarification in a letter dated 28th November 2014. In relation to the safeguarded land, the Inspector's main concern was that further justification "...about the scale of safeguarded land proposed and the release of particular sites..." was required before the approach could be considered sound.

The Inspector recognises that "...*there is some evidence to justify the release of the overall amount of safeguarded land, being partly based on the potential amount of land that may be required for development beyond the current plan period...*"

The Inspector comments that CEC does not forecast development requirements post-2030 and instead cites further options to accommodate future development needs however he notes that "...*these could apply equally to the current plan period, as well as in the longer term*" (paragraph 88).

In terms of identifying smaller scale areas of safeguarded land at the Site Allocations stage, the Inspector comments that the criteria for making such designations has not been set out (paragraph 89). Site selection criteria will be addressed separately as part of the Site Allocations work and therefore does not fall within the scope of this report.

CEC therefore need to address the following issues:

- 1) Forecasting development requirements post-2030; and
- 2) Justifying the scale of safeguarded land proposed.

4 Policy, Guidance and Best Practice

National Planning Policy Framework

Paragraph 85 of the National Planning Policy Framework ('NPPF') represents the starting point setting out the requirements for safeguarded land. Paragraph 85 states:

"When defining boundaries, local planning authorities should:

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*
- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*

- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.*

Therefore paragraph 85 establishes the principle that in some cases there may be a need for an authority’s spatial plan to include areas of land to meet its long term development needs. Specifically, this states that these should stretch ‘well beyond the plan period’ however does not specify how far beyond this should go. This action will also ensure the permanence of Green Belt boundaries by safeguarding specific areas for future development needs without triggering the need to fundamentally alter the Green Belt boundary in a shorter timescale (i.e. within the same plan period). Equally paragraph 85 provides protection for sites that are designated as safeguarded by stating that: “*planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development*”.

In addition, paragraph 83 adds that in undertaking a Local Plan review, local planning authorities should “...*consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*”. This would indicate that if exceptional circumstances mean that Cheshire East Borough Council seek to remove land from the Green Belt and allocated it for development then adequate land to allow the Green Belt boundary to endure beyond the plan period will be required. It is however unclear how the local planning authority should determine what amount of land beyond the plan period would be deemed adequate.

Planning Advisory Service ‘The Big Issues – Green Belt Exceptional Circumstances’

Guidance issued by the Planning Advisory Service offers some brief clarification upon the need to provide for safeguarded land within a spatial plan. The guidance defines the concept of safeguarded land as arising “*from the combination of the wish for permanence, and yet the inevitability of having to find land for development through development plans*”. The guidance paper notes that there is no guidance on how local authorities should interpret the safeguarded land policy in paragraph 85 and thus nationally there is inconsistency amongst local planning authorities in designating safeguarded land:

“In some cases local authorities seek to identify safeguarded land over and above the calculated development requirement for the plan period...there are certainly cases where the issue is effectively ignored by the planning authority and examining inspectors alike”.

Commons Debates May 2014

In response to debates regarding the concept of ‘safeguarded land’ held in May 2014², Nick Boles stipulated that whilst the terminology within the NPPF was not sufficiently clear, that the allocation of such land must have regard to the following:

“Safeguarding is not a requirement for every local authority with green-belt land. It is something that it can choose to do, but only if necessary. If the plan that it

² Daily Hansard – Westminster Hall (13 May 2014)

puts forward has provisions to meet housing needs in full and if other sites are available for potential future development beyond the life of the plan, it may well be that safeguarding land is unnecessary... While we want all communities to embrace growth, a vaulting ambition is not a sufficient justification for threatening protected land. Need is an important factor and can be a contributor to the exceptional circumstances that might justify some potential revision of a site's protected status. Ambition and the desire to grow faster than one's neighbours or perhaps to build a small empire is not a sufficient justification for putting protections at risk."

Summary of Issues from Policy and Guidance

The NPPF stipulates that local planning authorities when reviewing their Green Belt should consider the requirement to designate land as safeguarded in order to meet their district's long term development needs. Guidance from the Planning Advisory Service suggests that a lack of advice regarding the interpretation of the requirement has resulted in inconsistencies in approach between local planning authorities and Inspectors alike. Government advice highlights the importance of maintaining a balance between preserving the Green Belt and the need for long term expansion.

In spite of this lack of guidance, fundamentally there are two implications arising from the Inspector's comments and paragraph 83 and 85:

1. The quantum of safeguarded land required, how this relates to the current Objectively Assessed Need and the local interpretation of 'well beyond the Plan Period'; and
2. The location of safeguarded land and whether this should relate to the 'longer term development needs'.

Best Practice Research

National guidance highlights clear inconsistencies in approach to safeguarded land between local authorities thus this section provides an appreciation of the approaches adopted by various local authorities who have successfully adopted Local Plans in recent years.

Local Authority and Local Plan Status	Approach Adopted	Summary	Extent of Green Belt
Wakefield Metropolitan District Council Site Specific Policies Local Plan Adopted 2012	Allocates a number of sites (safeguarded land) as Protected Areas of Search for Long Term Development to be used for development in the longer term, should the need arise	Quantum: No reasoning behind quantum of safeguarded land Duration: No explanation on the duration of 'longer term development needs'	Whole authority constrained by Green Belt
Rotherham Borough Council Core Strategy	The Core Strategy indicates that the 'integrity of the Green Belt can be seriously compromised where its boundaries are constantly	Quantum: No explanation on	Whole authority

Local Authority and Local Plan Status	Approach Adopted	Summary	Extent of Green Belt
(adopted September 2014) RBC Final Draft Site and Policies	changing. In order to avoid the need for future review of the Green Belt boundary, it is necessary to identify safeguarded land between urban areas and the Green Belt which may be required to meet the longer term development needs at least five years beyond the end of the Plan Period.	quantum of safeguarded land. Duration: Five years beyond the end of the Plan Period.	constrained by Green Belt
Broxtowe Borough, Gedling Borough and Nottingham City Aligned Core Strategy ('ACS') Found Sound July 2014	The ACS carries forward the principle of safeguarded sites from each Borough's adopted Local Plans. Paragraph 3.3.4 states that 'in Gedling Borough, some areas of land are excluded from the Green Belt (as safeguarded land) to allow for long term (i.e. beyond the Core Strategy period) development needs. The Inspector considered that with regard to safeguarding, it would be appropriate for the Councils to identify such land in their Part 2 Local Plans, the proposed quantity of safeguarded land will therefore be defined in the Local Plan Part 2.	Quantum: To be defined in Local Plan Part 2. Duration: No indication of how far beyond the Core Strategy period.	Whole Greater Nottingham area constrained by Green Belt with particular importance on the area between Nottingham and Derby.
Rushcliffe Borough Council (adopted December 2014)	The adopted Core Strategy states that within the Local Plan Part 2 (Land and Planning Policies) consideration will be given to the identification of safeguarded land to meet longer term requirements beyond the Plan Period.	Quantum: To be defined in Local Plan Part 2. Duration: No indication of how far beyond the Plan period.	Green Belt constrains northern half of borough only
Leeds City Council Core Strategy adopted November 2014	The adopted Core Strategy designates land that is outside of the Green Belt for unidentified needs in the future (defined as Protected Areas of Search). Paragraph 4.8.7 establishes that <i>"through the LDF a sufficient and realistic supply of PAS land will be identified to provide contingency for growth if the supply of housing and employment allocations proves to be insufficient in the latter stages of the plan period"</i> . The Core Strategy suggests that new PAS should account for at least 10% of the total land identified for housing, and that the windfall allowance that is built into the housing target means that there is additional flexibility built into the	Quantum: 10% of total housing land identified Duration: No safeguarded land beyond the plan period given windfall allowance provides additional flexibility.	Whole authority constrained by Green Belt

Local Authority and Local Plan Status	Approach Adopted	Summary	Extent of Green Belt
	overall housing requirement, thus reducing the need for additional 'beyond-the-plan-period' sites.		
Bath and North East Somerset Local Plan Part 1 (adopted July 2014)	<p>The adopted Local Plan notes that when altering Green Belt boundaries, a long term view needs to be taken to ensure that boundaries endure beyond the plan period. The Inspector notes that <i>“[t]he scale of any such future [housing] needs which might have to be met within B&NES are unknown and this makes it impossible to balance future possible need for more greenfield land against the benefits of retaining land in the Green Belt. Although this may be a common dilemma when considering possible safeguarded land, the situation is more complex here.”</i></p> <p>As a result a Memorandum of Understanding has been confirmed by the four West of England Authorities to undertake a sub-regional assessment of need. The Inspector therefore considers that pursuing a substantial scale of safeguarded land would skew the figures from this future sub-regional assessment in identifying the most sustainable locations and he therefore takes a cautious approach in terms of scale. In considering the existing strategic allocations, the Inspector takes into account that each allocation will significantly boost the five year land supply.</p>	<p>Quantum: Inspector takes a cautious approach preferring not to safeguard large areas in the absence of a sub-regional assessment undertaken cooperatively by the West of England authorities.</p> <p>Duration: No reference to duration beyond the plan period.</p>	Whole area constrained by Green Belt
Knowsley Council (submitted in July 2013, with further consultation on major modifications held in early 2014)	<p>Core Strategy Policy CS5 states that there are broad locations (identified as 'reserve' and 'safeguarded') which will be removed from the Green Belt to meet longer term development needs. Safeguarded land for both housing and employment will only be released when this is necessary to maintain a five-year supply of deliverable sites.</p> <p>Land at Knowsley Village is identified as a 'safeguarded' location for residential development after 2028. Release of</p>	<p>Quantum: Preference to await the results of a sub-regional study given uncertainties in projecting development requirements beyond 2028.</p> <p>Duration: Safeguarded land for both housing and employment will only be released when this is</p>	Whole authority constrained by Green Belt

Local Authority and Local Plan Status	Approach Adopted	Summary	Extent of Green Belt
	<p>this land would account for 1093 dwellings post 2028 (which is approximately 2 years housing land supply).</p> <p>The Green Belt –Technical Report states that ‘due to significant uncertainties in projecting development requirements beyond 2028, it is considered appropriate to await a potential sub-regional study before considering whether to identify more Green Belt land to be safeguarded.</p>	necessary to maintain a five-year supply of deliverable sites.	
<p>City of York Council</p> <p>Further Sites Consultation 2014.</p> <p>Currently on hold so not tested at Examination.</p>	<p>In setting the amount of safeguarded land, the City of York approach is based on the Objectively Assessed Housing Need for York. The annual OAHN is projected forward for an additional 10 years to provide a housing requirement for 25 years. This 10 year requirement is then converted into a broad land take by using the local plan density policies. The City of York note that the projection of potential employment requirement is even more challenging than housing projections. They note that a combination of this extrapolation and the identification of circumstances where established employment sites can be extended to allow for their expansion should the plan review determine that this is necessary.</p>	<p>Quantum: Based on OAHN</p> <p>Duration: OAHN is projected forward for an additional 10 years beyond the 15 year plan period.</p>	Whole authority constrained by Green Belt

This demonstrates that the approaches adopted by different local authorities vary significantly. Some local authorities chose not to safeguard any land beyond the plan period, given there is either sufficient brownfield land to withstand future development pressures or, there is sufficient levels of safeguarded land for which there is considered to be a reasonable prospect of delivery. Other local authorities use a 15 year plan period followed by 5-10 years of safeguarded land to ensure that the Green Belt boundary retains a degree of permanence. The subjective nature of this period relates to the uncertainty in extrapolating existing Objectively Assessed Employment and Housing Need, the availability of windfall sites/brownfield land and the volatility of development pressures.

Where the authorities relied on objectively assessed need to project forward development requirements, this was assessed uniformly across the whole borough or Local Plan area given that in all cases apart from Rushcliffe, the Green Belt area constrains the whole of the borough. In Rushcliffe, the Green Belt only

covers the northern half of the borough however as yet they have not identified a quantum of safeguarded land as this is to be undertaken in the Local Plan Part 2.

4.1 City of York Legal Review

City of York Reported³ on a legal opinion in Local Plan Working Group on the 29th January, 2015. The view taken by John Hobson of Landmark Chambers is that:

- *‘Safeguarded land is required in order to **strike the balance between preservation of the Green Belt and the need for further expansion.** Consequently, if land is required to meet the longer term needs it should be excluded from the Green Belt and protected from pressure for development contrary to the longer term needs by including it as safeguarded land. However, it is important that any such land will be genuinely available and capable of development when it is needed. In the context of land included as safeguarded for employment use, paragraph 22 of the NPPF should be borne in mind, which cautions against long-term protections of sites for employment use where there is no reasonable prospect of the site being used for that purpose’.*
- *‘The **‘where necessary’** test adumbrated in NPPF Paragraph 85 therefore applies where longer term needs for development have been identified. So those needs can in due course be met, land should be safeguarded for the purpose of that development and, by identifying such land, the Green Belt can be protected from encroachment thus ensuring its boundaries remain permanent. From the information provided with my Instructions it appears to me that the situation in York is within the circumstances contemplated by this test.’*

Therefore whilst it is clear that there is a need to balance Green Belt preservation against the need for further expansion, there is less clarity regarding the definition of ‘where necessary’.

The opinion from Counsel is also very clear on the need for the Green Belt to endure beyond the Plan period and that land not needed for development during the Plan period should be protected as safeguarded land. Any other course of actions places the Plan at risk of being found unsound at examination. Paragraph 16 of the advice states that:

“In my opinion if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how the longer term needs of the areas could be met, and in particular a failure to indicate how those longer term needs could be met without encroaching into the Green Belt and eroding its boundaries.”

In respect of the period of time beyond the Plan period for which the Green Belt should be expected to endure, Counsel advises that this is a matter for planning judgement. He goes on to say that a ten year period beyond the life of the Plan would be appropriate for York.

³ <http://democracy.york.gov.uk/documents/s95547/Report%20-%20Local%20Plan%20Safeguarded%20Land.pdf>

Summary

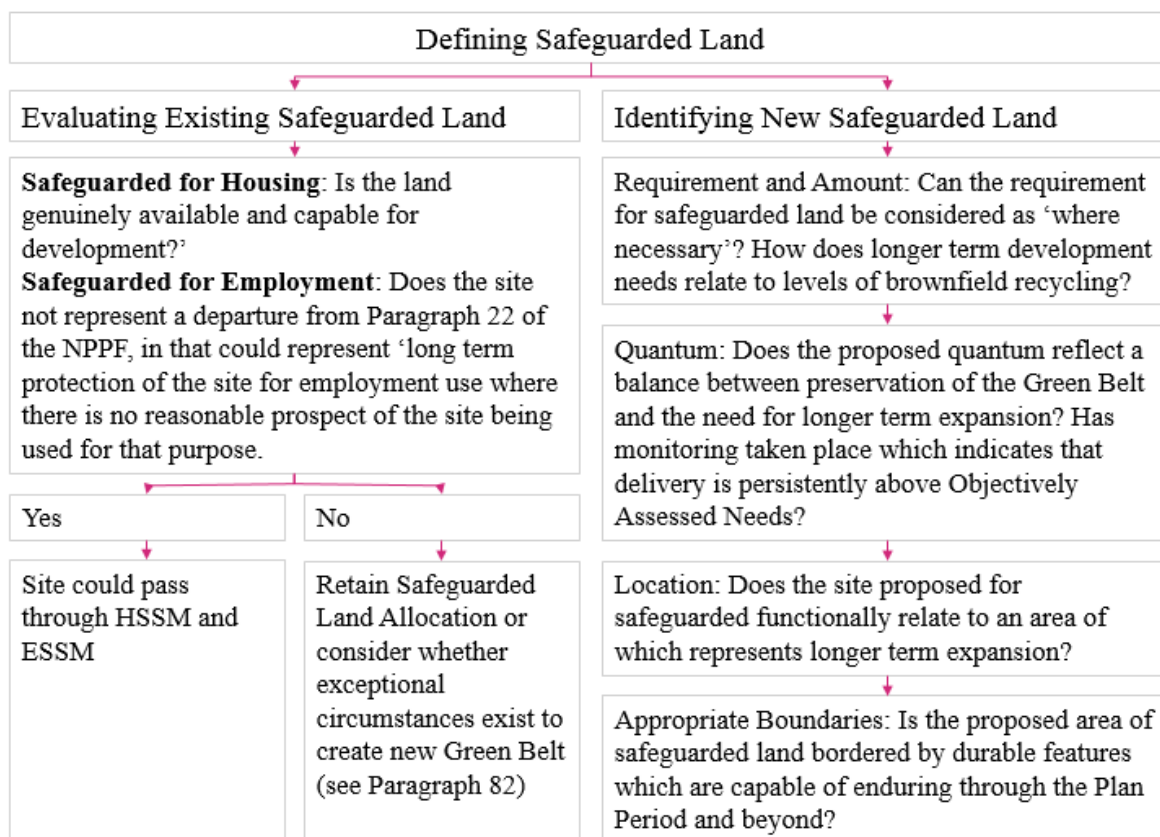
The examples above show a diverse range of approaches employed by different local authorities.

- The definition of **‘where necessary’**, in accordance with paragraph 85, is not consistent across Local Authorities. Generally, it is accepted that the definition of safeguarded land is necessary to meet potential long-term development requirements and avoid the need for another review of the Green Belt at the end of the Plan Period. Conversely, safeguarding additional land offers certainty and permanence to the boundary of the Green Belt and ensures that a Green Belt Review does not trigger the need for a Plan Review. Although the York Legal Review of safeguarded land does not explicitly state what constitutes ‘longer term development needs’, it is likely that the need for further expansion is based on brownfield recycling rate and reserves of developable and deliverable sites.
- **Quantum of Safeguarded Land:** Again the approach to defining the level of Safeguarded Land varies. Wakefield, for example, has identified that it is unnecessary to allocate any additional safeguarded land beyond their existing allocated Safeguarded Sites. Knowsley, Leeds, York and Rotherham have opted for the definition of an arbitrary number of years of safeguarded land (for examples, 2-10 years or a proportion of their total housing requirement). This arbitrary proportion is likely to be based on the level of weakly-performing Green Belt land and the resultant strength of the Green Belt boundary of these sites, alongside the recycling rate of brownfield land. No Local Authorities appear have allocated safeguarded land across two full Plan Periods.
- **Location of Proposed Safeguarded Land:** Generally, safeguarded land allocations are proposed on the edge of major site allocations. Boundaries are assessed against the definitions of the Green Belt boundaries.
- **Approach to Existing Safeguarded Land:** Based on the detail within the York Legal Opinion, safeguarded land should be included within the assessment of Green Belt land, then appraised for whether the land is likely to be ‘available and capable for development’ and for which there is likely to be a reasonable prospect for delivery.

5 Proposed Method

The next section of this report evaluates the national guidance and background research to determine an appropriate method for the definition of safeguarded land within Cheshire East. The proposed approach recommends reviewing the existing safeguarded land within the borough to determine its continued fitness for purpose, prior to identification of new safeguarded land where necessary. Figure 1 displays the overall process for defining future safeguarded land.

Figure 1 Process for Defining Safeguarded Land



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The emphasis of the advisory note is on 'identifying new safeguarded land' following the approach set out in the flow diagram in figure 1. Decisions to define new safeguarded land will need to focus on the required amount, where this should be located and take account of allocating safeguarded land 'where necessary'.

Local Interpretation of 'Where Necessary'

Paragraph 85 of the NPPF states that '**where necessary**, [LPA's should] identify in their plans areas of 'safeguarded land' between the urban area and the Green

belt, in order to meet longer-term development needs stretching well beyond the Plan Period’.

Stage 1: Assess the likely scale of previously developed land and whether windfall sites are a reliable source of supply.

The data from windfall completions (taken from the AMR) and assessment of potential supply of deliverable and developable sites will determine whether it is necessary for Cheshire East to identify safeguarded land in order to meet longer term development needs. This relates to Option 1 set out in the next section. It is important to consider the quantum of land available from brownfield recycling and windfall sites, and then make a judgement if safeguarded land is ‘necessary’. In the case of Cheshire East previously developed land and windfall sites are likely to provide additional flexibility and result in a slight reduction to the amount of safeguarded land required.

Defining the Quantum of Safeguarded Land

Stage 2: Define the quantum of safeguarded land.

Based on the above research of comparative Local Authorities and the national requirements for safeguarded land, it is possible to determine three options for defining the quantum of safeguarded land.

Option 1: No Safeguarded Land Identified

Research indicates that a number of Local Authorities have adopted Local Plans without allocation safeguarded land. If there is sufficient brownfield land that future development pressures will not compromise the strength of the Green Belt, or there is sufficient levels of safeguarded land for which there is considered to be a reasonable prospect of delivery, it may not be ‘necessary’ to identify safeguarded land beyond the Plan Period.

Note: This option is not considered to be appropriate for CEC given their local circumstances regarding availability of land within urban areas in the north of the borough compared to ‘objectively assessed housing need’. Once reviewed, the overall requirement is not to alter the Green Belt boundaries within the plan period, therefore CEC must identify safeguarded land.

Option 2: Identify an arbitrary level of Safeguarded Land based on ‘Longer Term Development Needs’ using Objectively Assessed Need.

A number of Local Authorities have indicated that a 15 year Plan Period followed by a 5 – 10 years’ worth of safeguarded land should ensure that the Green belt boundary retains a degree of permanence. The arbitrary nature of the level of safeguarded land relates to the uncertainty in the extrapolation of existing Objectively Assessed Employment and Housing Need, the availability of windfall sites/ brownfield land and the volatility of development pressures.

Projecting Objectively Assessed Need whilst accounting for the recycling rate of brownfield land and the existing rate of delivery on windfall sites, offers an estimate of longer term development needs of the District. Whether sufficient safeguarded land is identified for 5 or 10 years beyond the Plan Period will depend on three factors: the likely availability of deliverable and developable sites

in the urban form, the abundance of windfall sites across the Plan Period and the volatility of development pressures across the Plan Period.

Option 3: Identify two Plan Periods of Safeguarded Land

Although there appears to be no Local Authorities which have taken this approach to safeguarded land, this would effectively ensure the most pure approach to ‘evidence base’ and could refute the need for a separate Green Belt Review to be undertaken at the start of the next Plan Period. This approach will rely on the three factors above and a sufficient amount of weakly performing Green Belt land arising from the Green Belt.

For Option 2 and Option 3 it is recommended a ‘straight line projection’ is used when determining the amount of land required over the next 5 or 10 years. Adjustments to take account of economic or demographic changes are not considered appropriate when determining the quantum of safeguarded land due to limitations associated with identifying and applying a consistent approach to adjustment factors.

Recommended approach for Cheshire East

It is recommended Cheshire East pursue option 2 with a period of 10 years determined following the level of brownfield recycling and reliability of windfall sites.

In applying the two stage approach set out above, CEC will therefore need to:

Stage 1: Identify the level of brownfield recycling and windfall sites across the whole borough via the existing evidence base. The results of Stage 1 will impact how far forward the projections should go, for example, if the level of recycling/windfall sites is high, CEC could reduce the period of projections down from 10 to 5 years.

Stage 2: Project objectively assessed need⁴ (OAN) for 10 years beyond the plan period (dependent on Stage 1). Whilst it would be usual to project forward the OAN for the whole Borough, it may be appropriate for CEC to consider the objectively assessed needs across the northern part of the Borough by projecting the OAN within the northern sub market area. This is because it is only the towns in the northern sub market area that are inset within the Green Belt. For this approach to be appropriate, CEC would need to be satisfied that they are able to demonstrate a sufficient supply of land for the south of the Borough, outside of the Green Belt. This could involve consideration of potential sites in the SHLAA.

⁴ Cheshire East Council will need to determine whether to use objectively assessed housing and employment needs (OAN) or to use the housing and employment requirements proposed in the Local Plan Strategy if these differ from OAN figures.

Location of Safeguarded Land

Location: there has been limited precedent about the location of safeguarded sites. Given the need for safeguarded land to be based on durable and permanent boundaries it appears a sensible approach to follow the method used by City of York Council; to safeguarded land on the edge of proposed site allocations (with both the site allocation boundary and safeguarded land boundary based on permanent and robust boundaries).

Boundaries of Safeguarded Land

Appropriate Boundaries: The Green Belt Assessment Update 2015 has identified durable and permanent boundaries as required by NPPF. A policy decision will then be made by CEC as to whether land is required to be removed from the Green Belt. The identified new Green Belt Boundary will form the boundary of either a site allocation or safeguarded land, but must be based on a permanent boundary.

5.1 Responding to the Inspectors concerns

As set out in section 3 the Inspector raised the following concerns regarding the safeguarded land policy and proposals in the Local Plan Strategy (2014):

1. Further justification is needed about the scale of safeguarded land proposed, as CEC do not forecast development requirements beyond 2030.
2. The options proposed could in paragraph 8.61 of the Local Plan Strategy (2014) could be applied in the current plan period prior to 2030.
3. Further justification is needed about the release of particular sites.

This critical advice note recommends a method to identify and evidence the amount of safeguarded land required for Cheshire East beyond the end of the plan period in 2030. The recommended method can be used to respond directly to point 1 above. In addition, the evidence from the safeguarded land analysis can be used to replace the justification set out in paragraph 8.61 of the Local Plan Strategy (2014). Further justification about the release of sites will be addressed in a separate work stream, although advice has been provided in this note regarding the potential location of safeguarded land.

APPENDIX 1 ANNEX F

New Green Belt / Green Gap Policy

1 Introduction

- 1.1 Following consideration of the Inspector's Interim Views, the Arup New Green Belt Policy Advice Note and the available evidence, this Annex sets out a replacement policy for the New Green Belt proposal in the submitted Local Plan Strategy (LPS).
- 1.2 The previously proposed New Green Belt policy will be replaced by an alternative "Strategic Green Gaps" policy which will cover the gaps currently included in the existing Green Gaps policy (saved policy NE.4 in the Crewe and Nantwich Local Plan). These are identified as being the critical gaps to provide protection against coalescence, to protect the character and separate identity of settlements, and to retain the existing settlement pattern by maintaining the openness of land. The gaps identified in this policy are considered to be the strategic gaps required to prevent coalescence, primarily arising from the growth of Crewe.
- 1.3 In addition to the "Strategic Green Gaps" policy, further consideration should be given to an additional "Local Green Gaps" policy through the Site Allocations and Development Policies document.

2 Overview of Inspector's Interim Views

- 2.1 The Inspector found that there was insufficient justification in the evidence to establish a new Green Belt around Crewe. In particular, the following concerns were identified:
- 2.2 Although the evidence addresses the criteria that have to be met, it does not explicitly identify the exceptional circumstances needed to establish the new Green Belt.
- 2.3 The area of search for the new Green Belt extends much further than that currently covered by the Green Gaps policy, which may not be fully justified, and earlier versions of the Plan envisages a much smaller area of Green Belt.
- 2.4 Significant areas of new development are proposed within the area of search for the new Green Belt.
- 2.5 Crewe has been a location for growth in the past and the scale of growth now proposed is not significantly different than in the previous adopted Local Plan. This does not seem to represent a major change in circumstances to justify establishing a new area of Green Belt; it could also constrain further growth around Crewe in the future.

- 2.6 There seems to be little evidence to suggest that normal planning and development management policies (including the Green Gaps policy) would not be adequate, provided that a 5-year supply of housing land is consistently maintained.

3 Arup Advice Note

- 3.1 Ove Arup & Partners were commissioned by the Council to provide advice on the proposed policy for the creation of a new Green Belt and to consider whether an alternative policy approach would be more appropriate. The Arup advice note is included at the end of this Technical Annex.
- 3.2 The Arup advisory note considers the approaches to dealing with this issue including the evidence available, the Inspector's Interim Views and the outcomes of recent High Court and planning appeal decisions. It concludes that evidence submitted does not satisfy the Inspector that exceptional circumstances exist to justify the creation of a new Green Belt, and that based on the outcomes of recent High Court and planning appeal decisions, the existing Green Gaps policy cannot currently be considered 'insufficient'. As a result, it recommends that the LPS considers a new Green Gaps policy rather than proceeding with the proposed new Green Belt designation.
- 3.3 The Arup Advice Note recommends that the LPS employs a 'package of policies' which can be used in conjunction to protect the green gaps and open countryside around Crewe and Nantwich. This package of policies comprises of a new Green Gaps policy supported by 'protection' based policies, such as:
- Open countryside;
 - Environmental and heritage policies; and
 - The use of 'green buffers' within strategic sites adjacent to Green Gaps.

4 Evidence Base

- 4.1 The 'New Green Belt and Strategic Open Gap Study'¹ ("the Study") is the primary source of evidence for the proposed new Green Belt policy. In addition to considering the case for a new Green Belt, this study looks at alternative policy options such as a strategic open gap policy instead of a new Green Belt.
- 4.2 The Arup Advice Note recommends that this evidence be reviewed and updated to define critical and less critical gaps in order to refine the

¹ Examination document [BE 011]

policy response to ensure a consistent approach to protection within Green Gaps

- 4.3 The Study also makes an assessment of various gaps within the current Green Gap areas and beyond. It assesses the current character of the existing Green Gaps and considers whether they are still capable of performing their original purpose, to prevent the merging of settlements. The assessments look at land-use, settlement character, landscape character, environmental and historic designations and public routes providing views in and out of the countryside. They also consider the narrowest point of each gap and make visual assessments of the gaps.
- 4.4 The Study also looks at a number of other gaps beyond the current Green Gap areas, although the assessments of these other gaps are not as rigorous and do not include a full visual appraisal. The gaps appraised in the study are shown in Figure F.1 below.
- 4.5 The Study only assesses the broad area of each gap and does not provide the evidence for defining detailed boundaries.

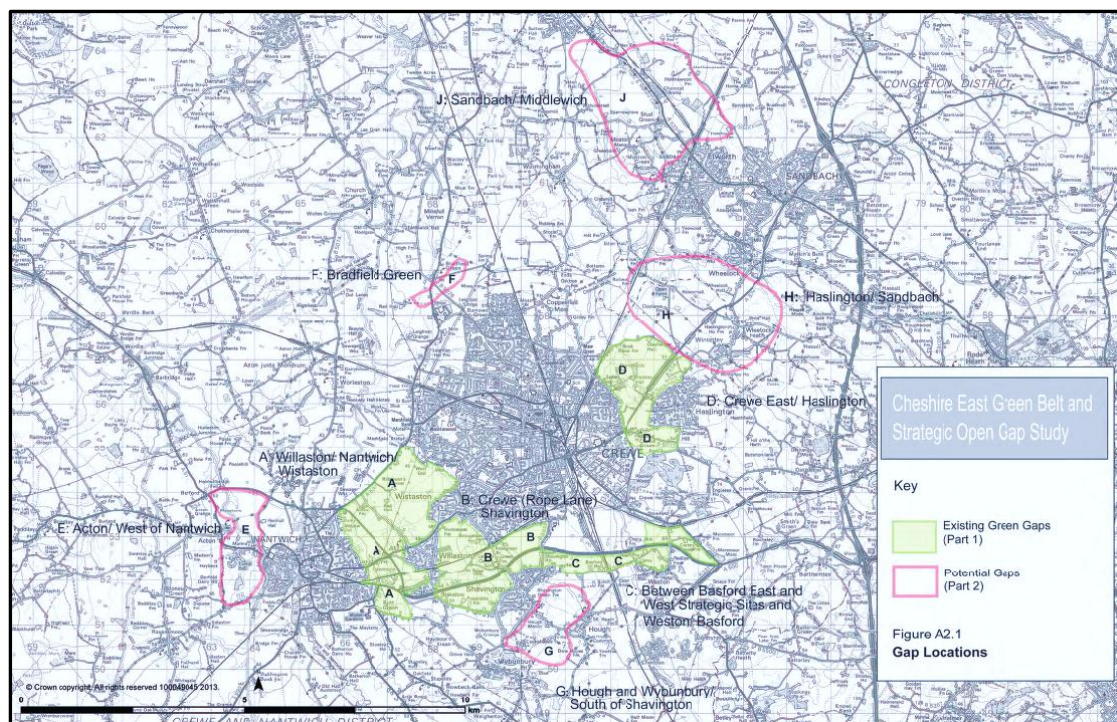


Figure F.1: Location of Gaps Appraised in the New Green Belt and Strategic Open Gaps Study

- 4.6 A review of the Study shows that there is sufficient evidence to justify a strategic open gap policy within the current Green Gap areas:
- Gap A: Willaston / Wistaston / Nantwich / Crewe;
 - Gap B: Willaston / Rope / Shavington / Crewe;

- Gap C: Crewe / Shavington / Basford village / Weston; and
 - Gap D: Crewe / Haslington.
- 4.7 The Study is clear that if a new Green Belt policy is not pursued then it will be essential to include these areas in a strategic open gap policy in the LPS. This policy would seek to identify land that performs an important role in protecting the setting and separate identity of settlements and to avoid coalescence; retaining the existing settlement pattern by maintaining the openness of the land; and retaining the physical and psychological benefits of having open land near to where people live.
- 4.8 It also recommends consideration of a strategic open gap between Sandbach and Middlewich (J), between Leighton and Bradfield Green (F) and between Shavington, Wybunbury and Hough (G). However, a review of the study shows that some additional evidence and further assessment of these gaps would be required before it could be determined whether their inclusion in a strategic gaps policy could be justified.
- 4.9 The Study concludes that for the other gaps between Haslington and Sandbach (H) and between Nantwich and Acton (E), normal policies such as those related to open countryside and heritage would suffice and there is no justification for their inclusion in a strategic gaps policy.
- 4.10 When considering the area of search for any potential new Green Belt, the Study also considers that it would be reasonable (if considering an extended Green Belt designation around the south, eastern and western edges of Crewe) to consider extending that designation towards the south-west to encompass other nearby settlements in the gap between Crewe and Stoke-on-Trent, that could in future become the focus for new development.
- 4.11 It may then be appropriate to consider additional gaps within the previous Green Belt area of search that have not been specifically-assessed in the Study. However, these gaps are unlikely to perform such a strategic function as those identified in the Study and consideration of further areas would require additional evidence.

5 Rationale for Protecting Gaps

- 5.1 The proposal for a new Green Belt was predicated, primarily, on a strategic need to prevent the neighbouring towns of Crewe and Nantwich merging together. The two areas have very different characters and origins: Nantwich is the historic centre of South Cheshire, with 2,000 years of settlement; Crewe is a 'railway town', a product of 19th Century rail expansion which has grown rapidly since then and threatens to overwhelm its smaller, historic neighbour. The aim of the new Green Belt policy, to realise the benefit of growth in

both towns whilst ensuring that they did not become physically linked and lose their individual characters, remains a fundamental objective of the LPS. This is supported by Strategic Priority 3 in the submitted LPS which seeks to maintain and enhance the character and separate identities of the Borough's towns and villages.

- 5.2 In addition, the Study also identifies a number of other nearby settlements where there is a risk of coalescence with Crewe where a strategic gap designation would provide protection against coalescence and help to preserve the distinct character and separate identity of these settlements.
- 5.3 Throughout the LPS preparation process, there was significant and consistent community support for a policy to maintain physical gaps between settlements and to preserve the distinctive character of each settlement. Both the Crewe and Nantwich draft Town Strategies received strong support, through comment forms and petitions. The Development Strategy², published in January 2013, included a proposal for two new areas of Green Belt (between Crewe and Nantwich and between Nantwich and Acton) and a 'Strategic Open Gap' policy to the south, east, north and north east of Crewe. This was supported by a petition with 1,914 signatures. One of the core planning principles as set out in the NPPF is that planning should *"be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area"*.

6 Local Plan Strategy Approach

- 6.1 The LPS should include a strategic policy with the core objective of maintaining the physical gaps between Crewe and Nantwich, as well as between Crewe and the villages of Willaston, Wistaston, Haslington and Shavington to prevent them from merging with each other. This is primarily due to the risk of coalescence arising from the growth of Crewe. This would apply to gaps A, B, C and D in the Study (the existing Green Gaps).
- 6.2 The other areas recommended for consideration for inclusion in a strategic open gaps policy by the Study are between Shavington, Wybunbury and Hough (G), Sandbach and Middlewich (J), and between Leighton and Bradfield Green (F).
- 6.3 Gap F is already covered by a site-specific policy in the LPS for site CS 3 (Leighton West) and strategic location SL 2 (Leighton): *"a green buffer should be provided between Leighton Hospital and the village of Bradfield Green"*.

² Examination Document [BE 100]

- 6.4 Gap J is outside of the previous area of search for a new Green Belt and does not accord with the proposed core objective of the policy to maintain the physical gaps between Crewe and Nantwich as well as between Crewe and its surrounding villages. It would also require further evidence to seek to justify inclusion in a strategic open gap policy.
- 6.5 There is an argument for including Gap G in the gaps policy, particularly as it would be an extension to the existing Green Gap and current development proposals would reduce the existing gap. However, it doesn't strictly accord with the proposed core objective of maintaining the physical gaps between Crewe and Nantwich, as well as between Crewe and the villages of Willaston, Wistaston, Haslington and Shavington to prevent them from merging with each other.
- 6.6 The February 2015 High Court judgment³ confirms that "*Policy NE.4 [existing Green Gap policy] did not come within paragraph 49, and the Inspector erred in finding that it did*". In other words, the existing Green Gap policy is not a housing land supply policy in the context of NPPF paragraph 49 and therefore is not considered out of date in the absence of a five year deliverable supply of land for housing. Inclusion of additional gaps risks diluting the core objective of the strategic gaps policy, increasing the potential for it to be considered a housing land supply policy. In addition, there is a requirement for further evidence to seek to justify inclusion of Gap G. It is therefore not proposed to include Gap G in the strategic gaps policy.
- 6.7 In addition to the strategic gaps policy included in the Local Plan strategy, it may be appropriate to consider a further local gaps policy through the Site Allocations and Development Policies document to deal with less critical gaps. This local gaps policy would be more restrictive than the open countryside policy but less restrictive than the strategic gaps policy in the LPS. It could consider the gaps discounted from the Study as well as other possible gaps in the former Green Belt area of search and any other gaps elsewhere in the Borough where evidence supports their inclusion. This would satisfy the Arup recommendation to consider critical and less critical gaps.
- 6.8 As there is insufficient evidence at this stage to define a detailed boundary, it will be necessary to save the extent of the existing Green Gap (as previously proposed in the submitted LPS). It is proposed to save the existing Green Gap policy (Policy NE.4, CNBC Local Plan 2005) and its detailed boundary alongside the new policy until detailed boundaries are defined on the Adopted Policies Map.

³ *Cheshire East Council v Secretary of State for Communities and Local Government* [2015] EWHC 410 (Admin)

- 6.9 The LPS already includes a suite of other policies related to open countryside, environment and heritage as recommended in Arup's advice note (as the 'package of policies'). It also includes requirements for 'Green Buffers' as part of development proposals where relevant – for example Site CS 3 and Strategic Location SL 2 have a requirement for a green buffer between Leighton Hospital and Bradfield Green; Site CS37 has a requirement for a green buffer between the site and Weston.

7 Changes to Submitted Local Plan Strategy

- 7.1 As a result of the proposed new policy, references to the creation of a new Green Belt in the submitted LPS policy PG 3 will be deleted.
- 7.2 A new policy entitled "Strategic Green Gaps" and associated justification will be inserted before the existing policy PG 5 on Open Countryside.

8 Proposed New Policy and Justification

- 8.1 The new Strategic Green Gaps policy is proposed as follows.

Strategic Green Gaps

8.63a Maintaining and enhancing the character and separate identities of the Borough's towns and villages is a key priority of the Local Plan Strategy.

Policy PG 4a

Strategic Green Gaps

1. The areas between the following settlements are defined as Strategic Green Gaps:
 - i. Willaston / Wistaston / Nantwich / Crewe;
 - ii. Willaston / Rope / Shavington / Crewe;
 - iii. Crewe / Shavington / Basford / Weston; and
 - iv. Crewe / Haslington.
2. These areas are shown on Figure 8.3a. The detailed boundaries of the Strategic Green Gaps will be defined through the Site Allocations and Development Policies document and shown on the Adopted Policies Map.
3. The purposes of Strategic Green Gaps are to:
 - i. Provide long-term protection against coalescence;
 - ii. Protect the setting and separate identity of settlements; and
 - iii. Retain the existing settlement pattern by maintaining the openness of land.
4. Within Strategic Green Gaps, policy PG 5 (Open Countryside) will apply. In addition, planning permission will not be granted for the construction of new buildings or the change of use of existing buildings of land which would:
 - i. Result in erosion of a physical gap between any of the settlements named in this policy; or
 - ii. Adversely affect the visual character of the landscape.
5. Exceptions to this policy will only be considered where it can be demonstrated that no suitable alternative location is available.

Justification

8.63b Within the areas to the south, east and west of Crewe, there are a number of neighbouring towns and villages in close proximity to each other. As Crewe has grown throughout the 20th Century, erosion of the gaps between Crewe, Nantwich and a number of smaller settlements has caused settlements to merge into the urban area in some cases, and very narrow gaps to remain in other cases.

8.63c The identification of Crewe as a spatial priority for growth brings significant opportunities for this area, but also some challenges. As Crewe grows to fulfil its potential it will become increasingly important to maintain the distinctive identity of

Nantwich and other nearby settlements and to prevent them from merging into a Greater Crewe urban area.

8.63d As set out in the ‘New Green Belt and Strategic Open Gaps’ study, strong and strategic long-term policy protection is required to maintain the existing gaps between Crewe and Nantwich, and between Crewe and other settlements that are at risk of coalescence resulting from the future growth of Crewe.

8.63e The detailed boundaries of the Strategic Green Gaps will be defined through the Site Allocations and Development Policies Document and shown on the Adopted Policies Map. Until that time, the Green Gap boundaries, as defined in the saved policy NE.4 of the Borough of Crewe and Nantwich Replacement Local Plan will remain in force, apart from where specific changes are proposed in this document through the allocation of Local Plan Strategy sites.

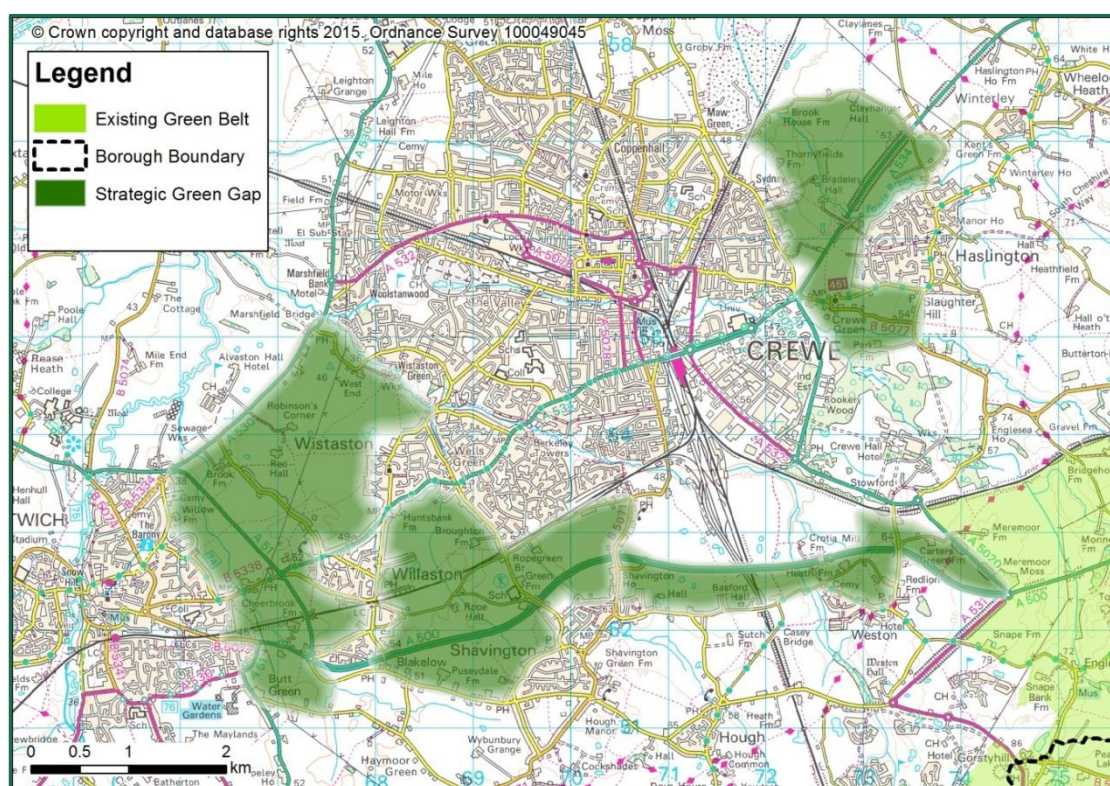


Figure 8.3a: Strategic Green Gaps

8.63f The gaps identified in this policy are considered to be the strategic gaps required to prevent coalescence, primarily arising from the growth of Crewe. The Site Allocations and Development Policies document will consider whether there are further, more localised gaps that require additional policy protection through a Local Green Gaps policy.

Key Evidence:

1. New Green Belt and Strategic Open Gap Study
2. Arup New Green Belt Policy Advice Note

9 Sustainability Appraisal and Habitats Regulations Assessment

- 9.1 The proposed new policy has been considered through the Sustainability Appraisal and Habitats Regulations Assessment processes.
- 9.2 The Sustainability Appraisal concludes that: *“The policy defines strategic green gaps which seek to provide long-term protection against coalescence, protect the setting and separate identity of settlements and retain the existing settlement pattern. The appraisal found that this has the potential for minor positive effects against a number of SA Objectives through protecting the openness of land surrounding settlements in these areas and the visual character of the landscape, as well as the retention of greenfield land, agricultural land and green infrastructure. Major long-term positive effects were identified for the landscape as the policy supports the retention of landscape features in between settlements, and supports the separate identities of townscapes. The appraisal also found that there is the potential for major long-term positive effects against SA Objective 16 (natural resources) through restricting development in these areas and therefore the loss of greenfield and agricultural land. The appraisal did not identify the potential for any significant negative effects”.*
- 9.3 The Habitats Regulations Assessment concludes that *“No impacts are anticipated. Maintaining the strategic green gaps may reduce the potential for future developments to impact upon Wybunbury Moss SSSI a component site of West Midland Mosses SAC and Midland Meres and Mosses Phase 1 Ramsar”.*

Sub-Annex F: Arup Critical Friend Advice Note – New Green Belt Policy

Cheshire East Council
**Green Belt Update - Critical
Friend Advice**
New Green Belt Policy

Issue | 20 April 2015

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 202xxx

Ove Arup & Partners Ltd
6th Floor 3 Piccadilly Place
Manchester M1 3BN
United Kingdom
www.arup.com

ARUP

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Contents

	Page
1 Introduction	1
2 Context	1
3 Local Plan Strategy and Inspectors Concerns	2
3.1 New Green Belt Policy	2
3.2 Evidence to justify new Green Belt policy.	3
3.3 Inspectors Interim Views	4
4 Recent Legal Decisions	4
5 Responding to the Inspector	6
5.1 Policy and best practice.	6
5.2 Evidence Gap analysis	7
6 Options Appraisal and Recommendations	11
7 Local Plan Submission	13
7.1 Recommended Approach and Next Steps	13
7.2 Responding to the Inspectors concerns	14

1 Introduction

Arup has been commissioned by Cheshire East Council (CEC) to give critical friend advice on proposed policy for the creation of new Green Belt in the Local Plan Strategy. The purpose of this advisory note is to explore the options and recommend a robust approach taking into account the concerns raised by the Inspector in his interim report in November 2014.

This advisory note first sets out the context for Cheshire East Council proposing a new area of Green Belt within the Local Plan Strategy. It details the current green gaps policy set out in the Crewe and Nantwich Replacement Local Plan, the proposed new Green Belt policy in the Local Plan Strategy and the Inspector's interim views regarding this change in approach.

The second part of this note includes analysis which compares the evidence for the new Green Belt policy against NPPF and PINs requirements. The note finally reviews the recent legal position of the current green gaps policy and concludes with an option appraisal of an array of potential policy approaches.

2 Context

Based on analysis of the 'New Green Belt and Strategic Open Gap' Study and the Local Plan Strategy (2014), the objective of Cheshire East Council is to limit development within and preserve the openness of the countryside to the south, east and west of Crewe and north east of Nantwich to prevent settlements from merging and forming a 'Greater Crewe' conurbation. The Crewe and Nantwich Replacement Local Plan includes a locally specific policy to ensure the continued protection of green gaps between these settlements.

The Crewe and Nantwich Replacement Local Plan (CNRLP) was adopted in 2005, with policies saved by the SoS in 2008. Policy NE4: Green Gaps identifies the following green gaps in the open countryside:

- Wistaston / Nantwich gap;
- Willaston / Rope gap;
- Haslington / Crewe gap; and
- Shavington / Weston / Crewe gap.

"Within these areas, which are also subject to policy NE2 (Open Countryside) approval will not be given for the construction of new buildings or the change of use of existing buildings or land which would: result in the erosion of the physical gaps between built up areas; or adversely affect the visual character of the landscape. Exceptions to this policy will only be considered where it can be demonstrated that no suitable alternative location is available." (CNRLP Policy NE4).

This policy has been specified to meet local circumstances where areas need additional protection to maintain the definition and separation of existing communities and support the longer term objective of preventing coalescence. Development pressures have been identified along principal traffic routes, with a

greater level of development control achieved through the policy to ensure continued separation of settlements.

CNRLP Policy NE2 details development permitted within open countryside. This covers development essential for the purposes of agriculture, forestry, outdoor recreation essential works by public service authorities or other uses appropriate to rural areas.

The objectives of the CNRLP Policy NE4 on green gaps are:

- to maintain the separate identities of Nantwich, Crewe and the settlements between them; and
- to preserve areas of open countryside from encroachment.

Over the last few years there has been increasing concern from Cheshire East Council regarding the strength of the CNRLP Policy NE4 on green gaps and its ability to deliver the Councils overall objectives. This has arisen as a result of a number of applications for developments in the green gaps surrounding Crewe and subsequent appeal decisions.

Concerns over current policy were demonstrated through the appeal decisions made in August 2014, detailed in section 4.3, which granted approval for a scheme located in the green gap south of Crewe. The Council considered this appeal decision undermined the purpose of the Green Gap policy in maintaining the separation between settlements.

In response, the Council proposed that to meet its objectives of preventing the merging of settlements to create a Greater Crewe conurbation, a new Green Belt would be required in this area. This was proposed in the emerging Local Plan Strategy through draft Policy PG3. Further details on this proposed new Green Belt policy and associated justification are set out in section 3.

3 Local Plan Strategy and Inspectors Concerns

3.1 New Green Belt Policy

Policy PG3 of the Local Plan Strategy (March 2014) sets out the new Green Belt policy:

“7. A new area of Green Belt will be designated adjacent to Crewe to prevent its merger with Nantwich and other surrounding settlements. It will also link to the existing Green Belt to help maintain the strategic openness of the gap between Crewe and the Potteries. The Area of Search for this new area of Green Belt is shown in Figure 8.2. The detailed boundaries of this new area of Green Belt will be defined through the Site Allocations and Development Policies Document.”

The Local Plan Strategy justifies the inclusion of a new area of Green Belt in the Borough:

“As Crewe has grown throughout the 20th Century, erosion of the gaps between Crewe, Nantwich and a number of smaller settlements has caused settlements to

merge into urban areas in some cases, and very narrow gaps to remain in other cases.” (Paragraph 8.51)

“As Crewe grows to fulfil its potential it will become increasingly important to maintain the distinctive identity of the other settlements within the area of search and to prevent them merging into a Greater Crewe urban area.” (Paragraph 8.52)

The saved Green Gaps policy (see section 2) from the Borough of Crewe and Nantwich Local Plan will continue to operate until the detailed boundaries of the new Green Belt are defined in the Site Allocations and Development Policies Document.

3.2 Evidence to justify new Green Belt policy.

The Local Plan Strategy (March 2014) lists the following key evidence to support the justification for the new area of Green Belt:

- Cheshire East Green Belt Assessment (September 2013)
- New Green Belt and Strategic Open Gap Study (September 2013)
- Strategic Housing Market Assessment (September 2010)
- Strategic Housing Market Assessment Update (September 2013)
- Employment Land Review (November 2012)

This list includes the ‘New Green Belt and Strategic Open Gap Study’ (September 2013), referred to as the Study, which Cheshire East Council commissioned to explore the options for protecting the countryside around Crewe and Nantwich.

The Study concluded that:

“all the gaps between the settlements that are protected by saved Green Gap Policy NE 4 and assessed in the study are considered to be at risk of coalescence primarily as a result of the future growth of Crewe. The gaps that remain between Crewe and Nantwich, Shavington, Weston and Haslington are narrow, mostly occupied by highways infrastructure and rarely so wide that development cannot be perceived on the opposite side.” (paragraphs 2.4.3 and 2.4.4).

The Study states strong policy protection will be required to maintain the existing gaps between settlements that are at risk of coalescence resulting from the future growth of Crewe. It assesses the development pressures around Crewe and Nantwich and considers the impact on existing gaps.

The options proposed in the ‘New Green Belt and Strategic Open Gap’ Study (September 2013) are:

- Option 1: No Special Protection – Normal Countryside Policies will apply;
- Option 2: Continuation of existing Green Gaps Policy (as a Strategic Open Gap); and
- Option 3: Designation of New Green Belt.

When proposing New Green Belt, the study identifies broad areas for possible Green Belt designation and assesses these against the five Green Belt purposes as defined in NPPF.

The study concluded that: *“The initial assessment demonstrates that all the gaps at present protected by saved Policy NE4 would robustly meet the specified purposes of Green Belt, as set out in para. 80 of the National Planning Policy Framework.”* The study considers extending the existing North Staffordshire Green Belt around the southern, eastern and western edges of Crewe as this would afford more effective policy protection than the Strategic Open Gap proposals. The study states there is insufficient evidence to justify New Green Belt designation to the area west of Nantwich.

Table 5.1 of the study recommends using a combined policy approach to protect green gaps around Crewe and Nantwich. It uses a combination of options 1 – 3, to specify ‘proposed’ and ‘alternative’ policy protection. In the majority of areas, the study recommends New Green Belt, with Strategic Open Gap and Countryside Policies in the remaining areas.

The conclusions and recommendations in the ‘New Green Belt and Strategic Open Gap’ Study (September 2013) pre-date the outcome of the legal judgements set out in section 4. Therefore, the context of the study and overall objective was to find an appropriate response which could offer the most effective and robust policy protection. This was the rationale behind the New Green Belt Policy proposals; justified by analysis of the effectiveness of CNRLP Policy NE4 and assessment of green gaps against the NPPF Green Belt purposes.

3.3 Inspectors Interim Views

The Inspector published his interim views on the Legal Compliance and Soundness of the submitted Cheshire East Local Plan on 12th November 2014 and provided subsequent clarification in a letter dated 28th November 2014. With regard to the proposed new area of Green Belt, the Inspector commented:

“...there seems to be insufficient justification for establishing a new Green Belt in the south of the district.” (Section A, paragraph 4).

In particular the Inspector highlighted the following points in paragraphs 91 and 92 of his interim views and paragraph 2vi of his clarification letter:

1. Identify exceptional circumstances needed to established proposed new Green Belt;
2. Provide evidence to support the likely extent of the new Green Belt;
3. Set out implications of proposed development within the new Green Belt search area;
4. Demonstrate the other policy is insufficient and new Green Belt is therefore required; and
5. Include proposed detailed boundaries of new Green Belt.

4 Recent Legal Decisions

The following section summarises the outcome of recent legal decisions which have implications for the appropriateness of existing CNRLP Policy NE4 and

thereby implications for the need for a new Green Belt policy in the Local Plan Strategy.

Applications made by Richborough Estates for 80 homes in Shavington (APP/R0660/A/12/2173294 - land on Rope Lane, Shavington) and 146 homes in Willaston (APP/R0660/A/14/2211721 - land north of Moorfields, Willaston) were refused by Cheshire East Council. Both cases went to appeal and in August 2014 both inspectors upheld the appeals and approval was granted.

For the Shavington scheme, the Inspector concluded that “*development plan policies NE 2 and NE 4 insofar as they regulate the supply of land for housing are not up-to-date.*”

For the Willaston scheme, the inspector considered policy NE4 to be out of date in light of the lack of a five year supply; limited weight was given to the emerging Local Plan; and the inspector concluded there was no significant harm to the wider functions of the green gap in maintaining the definition and separation between the settlements of Willaston and Rope. This suggested that Policy NE4 was in effect a form of housing policy and its implementation was thereby impacted by the five year housing land supply position.

An application for 44 houses at the Hunters Lodge Hotel in the Haslington Green Gap was made in by Seddon Homes in 2013 (APP/R0660/A/13/2203883 – Sydney Road, Crewe). The application went to appeal and the decision was upheld in July 2014. The Inspector found the openness and undeveloped character of the area to be visually important and of a distinct physical area even though not of exceptional landscape quality in its own right. The Inspector stated that:

“even though the actual percentage reduction in the distance of the edge of the built up area of Crewe to that of Haslington may not be high, I conclude that the physical form of the development would make the open area materially narrower and would add to coalescence.”

The Inspector also did not accept that Policy NE 4 should be regarded as a housing supply policy as it relates to an ‘area of land’ or ‘construction of any new building’ rather than a policy which ‘regulates housing supply’.

In January 2015, the SoS upheld the inspectors’ decision to refuse the Himor Group application for 880 homes, a school, retirement village and other amenities on green gap land at Shavington near Crewe (APP/R0660/A/13/2209335 - land bounded by Gresty Lane, Rope Lane, Crewe Road and A500, Crewe). The inspector concluded that whilst the scheme could be considered sustainable development, the benefits were outweighed by the adverse impact of permanently reducing the area of the green gap at a time when the Local Plan was under consideration. The refusal was upheld by the SoS who concluded

“*The Green Gap policy is not simply a housing restraint policy. It is a policy which seeks to retain a sense of separation between settlements...*”

The SoS decision was made due to the premature loss of the green gap, and any decision prejudicing the outcome of the Local Plan examination.

In February 2015 Cheshire East Council were successful in their High Court challenge to the planning inspector’s approval of 146 homes at Willaston. The High Court judge ruled the inspector had made an error in his application of the planning policy relating to maintaining a green gap at Willaston. The inspector

had incorrectly regarded the green gap policy as a housing policy, which he had considered out of date in light of the Council's inability to demonstrate a 5 year housing land supply. ***The applicant has applied to take the High Court decision to the Court of Appeal. If the decision is overturned then the conclusions of this critical advice note need to be revisited.***

Gladman Developments applied in June 2013 for outline permission for 300 homes in Wistaston, west of Crewe (APP/R0660/A/14/2213505 - land north west of Church Lane, Wistaston). CEC refused the application on the grounds it conflicted with the green gap policy NE4. The case went to appeal in August 2014 with the planning inspector recommending permission should be granted for the scheme. The application was called in by the SoS in March 2015, with the SoS disagreeing with the inspector's decision. In the decision letter significant weight was given to the policy "*in relation to the importance of avoiding erosion of the physical gaps between built-up areas and avoiding adverse impacts on the visual character of the landscape.*" The SoS also took the view that releasing land from the green gap between Wistaston and Nantwich could undermine the plan making process and policy in the emerging Cheshire East Local Plan.

These recent decisions all demonstrate the weight given to the Borough of Crewe and Nantwich Replacement Local Plan Green Gaps Policy (NE4) to prevent the erosion of gaps between built up areas. Particular weight must be given to the High Court decision in February 2015 and this is confirmed by the subsequent SoS decision in March 2015. These decisions demonstrate that Policy NE4 is not, in effect a housing policy. It is therefore an appropriate means of protecting the green gap from development that is considered inappropriate in the criteria of the policy.

5 Responding to the Inspector

In order to take account of the Inspector's views and respond accordingly, it is important to reflect on National Policy and Practice guidance and best practice advice. This section firstly reviews current guidance and practice advice, before applying this to Local Plan Submission Policy PG3 and supporting evidence to identify any gaps in CEC's proposed approach.

5.1 Policy and best practice.

The National Planning Policy Framework states: "*New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.*" (Paragraph 82).

To demonstrate exceptional circumstances Local Authorities should:

- demonstrate why normal planning and development management policies are not adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;

- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.

There is no direct reference made in National Planning Practice Guidance (NPPG) to New Green Belt Policy. The NPPG does emphasise the degree of protection afforded to Green Belt once designations have been established. Paragraph 44 reconfirms the guidelines set out the NPPF “...*local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in the Framework..., or specific policies in the Framework indicate development should be restricted. Such policies include land designated as Green Belt.*”

NPPG paragraph 44 also refers to the NPPF and the importance of Green Belt boundaries only being altered in exceptional circumstances. Paragraph 34 also refers to “very special circumstances” needed to justify inappropriate development on a site within the Green Belt.

The PAS advisory note¹ clarifies that land can only be included in Green Belt to achieve the five purposes as set out in NPPF Paragraph 80. Land proposed for inclusion in the Green Belt should be assessed against the five purposes to identify the level of contribution made and whether the land contributes to the overall aim of Green Belt as defined in NPPF Paragraph 79. In order to make a change to the Green Belt boundary in the local plan there have to be ‘exceptional circumstances’.

A brief review of best practice from other local authorities (such as the Gloucester, Cheltenham and Tewksbury Joint Core Strategy and the Royal Borough of Windsor and Maidenhead Core Strategy) shows that new Green Belt has been introduced through Local Plans as a result of minor boundary modifications and no significant areas of Green Belt have been proposed.

5.2 Evidence Gap analysis

The following table analyses the Local Plan Strategy Policy PG3 and supporting evidence on New Green Belt Policy against the Inspectors interim views and National Planning Policy Framework requirements to identify any gaps in the current approach taken by CEC.

NPPF Requirement	Inspectors View	Current Evidence	Evidence Gap
Demonstrate exceptional circumstances for new Green Belt.	Identify exceptional circumstances needed to establish	Section 3.6 of the New Green Belt and Strategic Open Gap Study sets out the exceptional circumstances in direct	Exceptional circumstances for New Green Belt have not been explicitly stated within the Local Plan Strategy, although paragraph 8.53 does refer to the need to

¹ Planning on the Doorstep: The Big Issues – Green Belt

NPPF Requirement	Inspectors View	Current Evidence	Evidence Gap
	proposed new Green Belt.	response to NPPF requirements.	<p>maintain existing gaps between settlements as a result of growth from Crewe.</p> <p>The New Green Belt and Strategic Open Gap Study focuses on development pressures to demonstrate why normal planning and development management policies are not adequate, and due to the timing of the Study publication does not take account of the effectiveness of CNRLP Policy NE 4.</p>
Demonstrate why normal planning and development management policies are inadequate.	Demonstrate why the other policy is insufficient and new Green Belt is therefore required.	Section 3.6 of the New Green Belt and Green Gaps Study concluded that is unlikely normal planning and development management policies will be sufficient to resist growing pressure for development on land within the narrow gaps. At the time several applications had gone to Appeal, with the applications indicating Policy NE4 lacked credibility.	The Local Plan Strategy proposes continuing the Green Gaps Policy until the New Green Belt Boundaries are defined the Site Allocations DPD. The Local Plan Strategy does not allow for the New Green Belt Policy to be used in conjunction with the Green Gaps Policy as recommended in the 'New Green Belt and Green Gaps Study.' Justification for New Green Belt in place of normal policies has also not been included in the Local Plan.
Show what the consequences would be for sustainable development.	Set out the implications of proposed development in the Green Belt search area.	<p>Section 3.6 of the New Green Belt and Green Gaps Study identifies potential areas for sustainable growth around Crewe and Nantwich taking account of new areas of Green Belt.</p> <p>The Local Plan Strategy Policy PG3 details</p>	Further analysis is needed on the feasibility and sustainability of development in the non-Green Belt areas around Crewe and Nantwich.

NPPF Requirement	Inspectors View	Current Evidence	Evidence Gap
		proposed development and development constraints within the Green Belt.	
Demonstrate changes in circumstances and the necessity for new Green Belt.		Section 3.6 of the New Green Belt and Green Gaps Study refers to the changes which have taken place since the introduction of the green gaps policy in 1996. Crewe has been identified as a key driver for growth with proposals such as Basford Strategic Employment Site. There are also principal transport routes along the narrow gaps which are increasing development pressures and merging of settlements in these areas.	Paragraphs 8.51 and 8.52 of the Local Plan Strategy do make reference to development of Crewe and future growth. However further work is needed to understand if there are any significant changes in circumstances which justify a new Green Belt above a local / strategic green gaps policy.
	Provide evidence to support the likely extent of the new Green Belt. If sufficient information is available, include proposed detailed boundaries.	The New Green Belt and Green Gaps Study identifies the area of search for the new Green Belt. The Local Plan recognises that further work is needed in the Site Allocations and Development Policies DPD to define the new Green Belt boundaries.	Further work needed to identify and prioritise the critical green gaps as this will determine the extent of the new Green Belt or other appropriate policy response.

The analysis in the above table shows the evidence needed to demonstrate the requirement for New Green Belt and satisfy the Inspector. The table shows there are gaps relating to sufficient demonstration of 'exceptional circumstances' for New Green Belt and justification regarding the inadequacy of normal planning and development control policies.

It should also be noted that New Green Belt Policy was proposed at a time when significant development pressures were being placed on green gaps around Crewe and Nantwich. In light of the legal decisions summarised in section 4 and the Inspector's interim views regarding Local Plan Policy PG3 for New Green Belt, alternative policy options may be more appropriate. The range of options available to CEC is considered in detail in section 6.

6 Options Appraisal and Recommendations

In light of the recent High Court and Appeal decisions it is necessary to re-appraise the options identified in the 'New Green Belt and Green Gaps Study' (July 2013).

Option	Details	Risks	Benefits	Comments
New Green Belt	Introduction of new Green Belt around Crewe and Nantwich. (Policy PG3 in the Local Plan Strategy).	The 'New Green Belt and Strategic Open Gap Study' questions whether the whole extent of the new Green Belt can be justified. Further work is needed to respond to the Inspectors concerns.	As per NPPF criteria Green Belt designation affords the greatest degree of protection and development can only occur if permitted in the NPPF or if 'very special circumstances' are demonstrated.	Question whether the 'exceptional circumstances' case for new Green Belt can be sufficiently demonstrated, especially in light of the recent legal decisions supporting Policy NE4. Can the strategic proposals around Crewe be used to justify 'exceptional circumstances'?
Strategic Open Gap	Proposed within the 'New Green Belt and Strategic Open Gap Study'. It refers to strategic gaps covering broad swathes of open countryside, preserving physical and visual separation between settlements.	Policy is untested in Cheshire East and could be subject to challenge. Any new policy wording would be subject to representations. (Consideration would need to be given to best practice examples elsewhere – e.g. Chesterfield and Harborough).	This could provide an updated position for the Local Green Gap Policy. The strategic nature of the Open Gap policy means it can be applied to endure beyond the lifetime of the Local Plan Strategy.	This represents an updated position to the green gaps policy and can be applied for 'critical' green gaps where there are recognised development pressures.

Local Green Gap	Continue with Policy NE4 (or similar).	Policy was introduced in 1996 and could be considered 'out of date' if changing circumstances justifying development pressures prevail.	Recent legal decisions have successfully demonstrated the credibility of Policy NE4 in its ability to defend development restrictions in the green gaps around Crewe and Nantwich.	Consider applying an up to date version of a green gaps policy, as this has been successfully applied to the local circumstances around Crewe / Nantwich.
Open Countryside Policy	Relates to Policy NE2 (or similar).	Risk that development benefits could be judged to outweigh impact on the countryside.	Could be applied to meet local circumstances for 'less critical' green gaps.	Consider use of this policy alongside the recommended policy.
Local Green Space Designation	Introduced in NPPG (March 2014).	According to NPPG criteria Local Green Space Designation cannot be applied to 'extensive tracts of land' and need to relate to local circumstances.	Local Green Space Designations could be successfully applied for smaller scale 'less critical' gaps where spaces are demonstrably special to the local community.	Consider using this type of designation for 'less critical' green gaps as it can be applied to offer 'special protection' but must take account of identified development needs.
Green Buffer within Strategic Site/s	A substantial green buffer can be established between strategic sites and adjacent settlements.	The status of the green buffer means there is risk of encroachment from development over time.	This can be applied to meet specific local circumstances, associated with strategic sites around Crewe identified in the Local Plan Strategy.	Consider using in addition to core Green Belt or Green Gap policy.

The options analysis table shows there is a varied range of policy options which can be taken forward and used as a combined package by Cheshire East Council. On the basis of the analysis the recent High Court and SoS decision means it is unlikely to be necessary to meet the Council's objective of preventing settlements merging and resulting in a Greater Crewe conurbation through a new Green Belt. It is apparent that a green gaps policy in line with the existing Policy NE4 would fulfil this purpose. There are other supporting policies that could be applied but the main protection can be provided through a green gaps policy.

7 Local Plan Submission

7.1 Recommended Approach and Next Steps

Based on the analysis in this advisory note including the outcome of the high court and appeal decisions, the recommendation is for the Local Plan Strategy to propose a 'package of policies' which can be used in conjunction to protect the critical green gaps and the open countryside around Crewe and Nantwich. This aligns with the findings of the 'New Green Belt and Strategic Open Gaps Study' (referred to as the Study) which concludes that:

"strong policy protection continues to be necessary to safeguard the existing gaps between settlements that are at risk of coalescence resulting from the future growth of Crewe"(paragraph 3.8.3).

The 'package of policies' comprises of a new Green Gaps Policy supported by 'protection' based policies such as open countryside, environmental and heritage policies and the use of green buffers within strategic sites adjacent to green gaps.

The recommendation to pursue a Green Gaps Policy is in line with the Strategic Open Gap option in the 'New Green Belt and Strategic Open Gap Study' and the approach taken for the local Green Gap Policy (CNRLP Policy NE4). The benefit of this approach is that it can build on the legal precedence set from Policy NE4, which will provide clarity for policy implementation.

The conclusion from the analysis in this advisory note is the Local Plan Strategy and supporting evidence does not sufficiently make the case for 'exceptional circumstances' for new Green Belt between Crewe and Nantwich. The above recommendation to pursue a Green Gaps Policy would mean revising the Local Plan Strategy to remove any references to new areas of Green Belt.

Justification for a new Green Gaps Policy can be established using the existing evidence from the 'New Green Belt and Strategic Open Gap Study'. Stage 4 of the study sets out the justification and proposed criteria for the assessment of potential areas for coverage by Strategic Open Gaps. The Study states the broad purposes of Strategic Open Gaps are:

1. To protect the setting and separate identify of settlements, and to avoid coalescence;
2. To retain the existing settlement pattern by maintaining the openness of land; and
3. To retain the physical and psychological benefits of having open land near to where people live.

The 'New Green Belt and Strategic Open Gap' Study identifies the criteria for Strategic Open Gaps are the open nature of countryside between settlements; the settlement character and identity; the physical and visual separation between settlements at risk of coalescence; the setting for a town/village including its heritage; and opportunities for access to the countryside.

There is an opportunity to update the evidence in the 'New Green Belt and Strategic Open Gap Study' to take account of:

- up to date development pressures around Crewe and Nantwich;
- growth apportioned to Crewe and Nantwich within the Local Plan Strategy (as proposed to be modified);
- sustainability considerations; and
- assessment of critical and less critical green gaps.

The 'New Green Belt and Strategic Open Gap Study' provides a comprehensive recent evidence base from which to define the new Green Gaps Policy. Stage 2 of the Study sets out the approach taken to assess the existing gaps between settlements, whilst Stage 3 of the study assesses the gaps against the five Green Belt purposes set out in paragraph 80 of the NPPF and Stage 4 proposes Strategic Open Gap designations. The results of the gap assessment are detailed in Appendix 2 of the 'New Green Belt and Strategic Open Gap' Study. This evidence can be reviewed and used to define critical and less critical green gaps in order to refine the policy response to ensure a consistent approach towards protection within green gaps.

The Local Plan Strategy can take forward the recommendations from this advisory note by specifying the general extent of the Green Gaps around Crewe and Nantwich; and justifying the approach to preventing the coalescence between settlements. The Local Plan Strategy can be revised to propose the appropriate package of policies based on the criticality of the green gap, as identified in an update to the evidence base. The detailed boundaries of Green Gaps can be specified in the Spatial Allocations and Development Policies.

7.2 Recommendations to address the Inspectors concerns

Section 3.3 of this advisory note sets out the concerns raised by the Inspector in the Interim Views Report. The Inspector found there was insufficient justification within the Local Plan Strategy (2014) to establish a new Green Belt around Crewe and Nantwich.

This advisory note has sought evaluate the evidence relating to the following concerns:

1. Identify exceptional circumstances needed to established proposed new Green Belt;
2. Provide evidence to support the likely extent of the new Green Belt;
3. Set out implications of proposed development within the new Green Belt search area;

4. Demonstrate the other policy is insufficient and new Green Belt is therefore required; and
5. Include proposed detailed boundaries of new Green Belt.

Based on the outcomes of recent High Court and Appeals decisions, the advisory note has concluded the 'other' Green Gaps policy cannot currently be considered 'insufficient'. The Local Plan Strategy also does not currently satisfy the Inspector that exceptional circumstances for new Green Belt have been demonstrated. Therefore, the advisory note recommends the Local Plan Strategy considers a new Green Gaps policy rather than proceeding with new Green Belt designation.