The Planning Inspectorate

Report to Cheshire East Council

by Stephen J Pratt **BA (Hons) MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

20 June 2017

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Cheshire East Local Plan Strategy Development Plan Document

The Plan was submitted for examination on 20 May 2014

The examination hearings were held between 16 October – 3 November 2014, 20-30 October 2015 & 13 September - 20 October 2016

File Ref: PINS/R0660/429/3

Abbreviations used in this report

A6MAAR	A6 Manchester Airport Relief Road
CBLP	Congleton Borough Local Plan
CSC	Cheshire Science Corridor
CEC	Cheshire East Council
CELPS	Cheshire East Local Plan Strategy
CELPS-SD	Cheshire East Local Plan Strategy – Submission Draft (May 2014)
CELPS-PC	Cheshire East Local Plan Strategy – Proposed Changes (March 2016)
CIL	Community Infrastructure Levy
CLR	Congleton Link Road
C&NLP	Borough of Crewe & Nantwich Local Plan
CW&CLP	Cheshire West & Chester Local Plan
DCLG	Department for Communities & Local Government
DPD	Development Plan Document
DtC	Duty to Co-operate
dw; dw/yr	dwellings; dwellings/year
EA	Environment Agency
EZ	Enterprise Zone
GBAU	Green Belt Assessment Update
GMCA	Greater Manchester Combined Authority
GMSF	Greater Manchester Spatial Framework
GTAA	Gypsy & Travellers Accommodation Assessment
ha	hectares
HDS	Housing Development Study
HRA	Habitats Regulations Assessment
IDP/IDPU	Infrastructure Delivery Plan/Infrastructure Delivery Plan Update
HS2	High Speed 2 rail proposal
KSC	Key Service Centre
LDS	Local Development Scheme
LEP	Local Enterprise Partnership
LSC	Local Service Centre
LTP	Local Transport Plan
LWS	Local Wildlife Site
MBLP	Macclesfield Borough Local Plan
MEB	Middlewich Eastern By-Pass
MM	Main Modification
MOU	Memorandum of Understanding
MSA	Mineral Safeguarding Area
MWMS	Municipal Waste Management Strategy
NCGV	North Cheshire Growth Village
NPA	National Park Authority
NPPF	National Planning Policy Framework
NPPW	National Planning Policy for Waste
OAN	Objective Assessment of Housing Need
¶/para	paragraph
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
PRR	Poynton Relief Road
SA; SIA	Sustainability Appraisal; Sustainability (Integrated) Appraisal
SAC	Special Area of Conservation
SADPDPD	Site Allocations & Development Policies DPD
SCGV	South Cheshire Growth Village
SDUR	Spatial Distribution Update Report
SEA	Strategic Environmental Assessment
SEMMMS	South East Manchester Multi-Modal Study
SEP	Strategic Economic Plan
SHMA	Strategic Housing Market Assessment
SLTA	Safeguarded Land Technical Appendix
SMBC	Stockport Metropolitan Borough Council
SMDA	South Macclesfield Development Area
SOCG	Statement of Common Ground
SSSI	Site of Special Scientific Interest
SWMDA	South West Macclesfield Development Area
UPS	Urban Potential Study

Non-Technical Summary

This report concludes that the Cheshire East Local Plan Strategy provides an appropriate basis for the planning of the Borough providing a number of Main Modifications are made to the Plan. Cheshire East Council (CEC) has specifically requested me to recommend any Main Modifications necessary to enable the Plan to be adopted. All the Main Modifications to address this were proposed by the Council, and were subject to public consultation over a 6-week period. I have recommended their inclusion after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Replace the Submitted Plan with the Proposed Changes (March 2016) version;
- Amend the Vision to refer to "identified" housing and employment needs;
- Amend Policy PG1 and the accompanying text and tables to refer to the 2014-based DCLG household projections and update the components of housing supply, including windfall allowance;
- Amend the Vision and strategy for Local Service Centres and the status of North Cheshire Growth Village in Policy PG2;
- Update the list of sites released from the Green Belt and Safeguarded Land in Policies PG3 & PG4 and in the accompanying figures;
- Clarify the criteria for development in the Strategic Green Gaps in Policy PG4A and amend the accompanying figure showing the broad extent of such areas;
- Clarify the strategy for development in the open countryside in Policy PG5;
- Confirm that the figure for Local Service Centres will be disaggregated in the Site Allocations & Development Policies DPD in Policy PG6;
- Update and clarify the strategy for sustainable development in Policies SD1 & SD2;
- Delete Figures 11.1 & 11.2 showing the High Growth City Concept Plan and the Science & Technology Corridor; update the strategy for Alderley Park set out in Policy EG3, and confirm that the sequential approach will not be applied to small-scale developments in Policy EG5;
- Clarify and update the policy for leisure and recreation in Policies SC1 & SC2; include a reference to the role of Neighbourhood Plans in Policy SC4; and amend and clarify the threshold for seeking affordable housing in Policy SC5;
- Add a reference to Sport England's Active Design principles in Policy SE1; redraft the policy for protecting biodiversity and geodiversity in Policy SE3; clarify and update the policy for trees, hedgerows and green infrastructure in Policies SE5 & SE6; update the policy for renewable and low-carbon energy and energy efficient development in Policies SE8 & SE9; and update the evidence base for waste management in Policy SE11;
- Update and clarify the policy for enabling business growth through transport infrastructure by referring to the HS2 Safeguarding Directions and the SEMMMS study refresh in Policy CO2;
- Amend and update the Crewe Town Map and refer to the HS2 Safeguarding Directions, including at Site CS2;
- Update the individual Town Maps for Macclesfield and the Key Service Centres, as a result of amendments to the scale and location of proposed development;
- Confirm the role, status, purpose and funding of the Congleton Link Road;
- Update and clarify the criteria and principles of development, the amount of development, development and infrastructure requirements and planning status, where necessary, in the strategic site allocations and strategic locations;
- Amend the strategic site allocations, including amended site extent and areas (Sites CS32, CS50) and deletion of Site CS64 (Cheshire Gateway);
- Make consequential amendments to the text, tables, figures and diagrams resulting from the Main Modifications;
- Update and amend the content of the appendices, including monitoring and implementation, housing distribution, amended housing trajectory, components of housing supply (including windfalls), and 5-year housing land supply (including the "Sedgepool 8" approach).

Introduction

1. This report contains my assessment of the *Cheshire East Local Plan Strategy Development Plan Document* (CELPS) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It first considers whether the Plan complies with the legal requirements, including the Duty to Co-operate, recognising that there is no scope to remedy any failure of the latter requirement. It then considers whether the Plan is sound in terms of the National Planning Policy Framework (NPPF). This confirms that to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy (NPPF; ¶ 182).

Background

2. The starting point for the examination is the *Cheshire East Local Plan Strategy Submission Draft* (May 2014) (CELPS-SD) [SD/001]. I held an initial series of hearing sessions to discuss key issues relating to the soundness of the Plan in September-October 2014. These hearings covered the strategic policies in the Plan, but deferred consideration of strategic sites and strategic locations. In November 2014, I issued my Interim Views on the legal compliance and soundness of the submitted Plan (Appendix 1) [PS/A017]; this identified some fundamental shortcomings in the CELPS-SD in terms of soundness. In December 2014, at the Council's request, I suspended the examination to enable them to undertake further work and prepare additional evidence to respond to my Interim Views.

3. In July 2015, Cheshire East Council (CEC) published additional evidence and asked me to formally resume the Examination. In October 2015, I held a further series of hearings to discuss key issues raised by the additional evidence, following which I published my Further Interim Views (Appendix 2) [RE/A021]; this confirmed that this additional evidence seemed to have addressed most of the main concerns set out in my earlier Interim Views. CEC then prepared Proposed Changes to the CELPS-SD, to address issues raised by the additional evidence and my Further Interim Views. The Cheshire East Local Plan Strategy - Proposed Changes (Consultation Draft – March 2016) (the "Revised Plan") (CELPS-PC) [RE/F003] was published for public consultation between 4 March – 19 April 2016, accompanied by further evidence produced during and since the suspension of the Examination.

4. In September-October 2016, following CEC's consideration of the representations, I resumed the hearing sessions to consider key matters and issues arising from those policies which were subject to the Proposed Changes, as well as those relating to the strategic site allocations and strategic locations which had not yet been discussed in detail. During the course of these hearings, CEC put forward some further changes to the CELPS-PC. Following the completion of these hearings, CEC produced a Schedule of Further Proposed Changes to the CELPS-PC [RH/D008]. In December 2016/January 2017, I set out my views on Further Modifications needed to the CELPS-PC [RH/D009; RH/D015]. CEC then published a Schedule of Proposed Main Modifications to the CELPS-PC [MM/001], which was subject to public consultation during February – March 2017. CEC considered the representations on the Main Modifications and published a Report of Consultation [MM/009]. I then considered the main issues raised in these representations, along with CEC's responses, in coming to my conclusions on the soundness of the Plan. However, many of these representations did not refer directly to the content of the relevant modifications or reiterated points made at earlier stages of the examination; no new issues were raised at this stage.

5. The CELPS-PC made some significant changes to the CELPS-SD. These included increasing the overall amount of new housing from 27,000 to 36,000 homes; increasing the amount of new employment land from 300 to 380ha; replacing the proposed new Green Belt in the south of the Borough with an enhanced Strategic Green Gap policy; amending the Green Belt boundary and identifying an increased amount of Safeguarded Land (200ha); establishing a revised spatial distribution of development to the main towns, including identifying some additional development sites, particularly at the towns in the north of the Borough, some of which involve Green Belt land; along with other changes to the strategic policies and details of the proposed site allocations.

6. Although the changes to the CELPS-SD are significant, they do not represent a fundamentally different plan or represent a total re-writing of the original plan. Most of the strategic policies remain broadly the same and most of the original site allocations are retained in the CELPS-PC. Some policies have been updated to reflect changes in national policy or address soundness issues, and some additional site allocations are proposed, particularly at the towns in the north of the Borough. But the underlying strategy, focusing most new development at the Principal Towns and Key Service Centres, distributing development across the Borough and aiming to minimise the loss of Green Belt, remains similar to that in the CELPS-SD. The NPPF and associated PPGs do not limit the scope and extent of changes that may be made to a local plan during the course of the examination in order for it to meet the tests of soundness. Indeed, the Courts have endorsed the power to vary or amend a draft plan by making Main Modifications to enable it to be found sound.

7. Since the CELPS-SD has largely been superseded by the CELPS-PC, it is this later version of the Plan that essentially forms the subject of my report. In order to recognise this unusual situation, my first formal procedural modification is to recommend replacing the CELPS-SD with the CELPS-PC **[PMM01]**. This modification is necessary to address the soundness issues raised during the examination and in my Interim Views & Further Interim Views (Appendices 1 & 2). Since all these changes were subject to full and unfettered public consultation in March-April 2016 and were fully considered and discussed at the resumed hearings in September-October 2016, and no-one has been prejudiced, there is no need for any further consultation on these changes. Where these changes are superseded by later amendments, they are subject to new Main Modifications.

Main Modifications

8. In accordance with Section 20(7C) of the 2004 Act, CEC has requested me to recommend any modifications needed to rectify matters that make the Plan unsound or not legally compliant, and thus incapable of being adopted. This report explains why the recommended Main Modifications, all of which relate to matters discussed at the examination hearings, are necessary. The recommended Main Modifications are identified in bold in the report **[MM]**, and are set out in the accompanying schedule. CEC also proposes to make other minor changes ("Additional Modifications") to the Plan, which do not affect its overall soundness and do not need any endorsement from me.

Policies Map

9. CEC must maintain an adopted policies map which illustrates the geographical application of the policies in the adopted development plan. When submitting a local plan for examination, CEC is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the Local Plan Strategy Policies

Map accompanied the CELPS-SD as originally submitted [SD/002], and an amended Policies Map accompanied the CELPS-PC at its consultation stage [RE/F007].

10. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published Main Modifications to the Plan's policies require further corresponding changes to be made to the CELPS Policies Map. These further changes to the Policies Map were published for consultation alongside the Main Modifications [MM/004]. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, CEC will need to update the adopted policies map to include all the changes arising from the Main Modifications set out in the policies map accompanying this consultation [MM/004].

11. My approach to the Examination has been to work with CEC and other participants in a positive, pragmatic and supportive manner. In so doing, I have considered all the points made in the representations, statements and at the hearing sessions. However, the purpose of this report is to focus on the legal compliance and soundness of the Plan, giving reasons for the recommended modifications, rather than responding to every point made in the representations and discussions. To avoid unnecessary repetition and duplication, my report is intended to be read in the light of the interim conclusions in my two previous Interim Views (Appendices 1 & 2), which are an integral part of the report on the examination of the CELPS.

12. After considering issues relating to legal compliance and the Duty to Co-operate, my report first considers the strategic policies before dealing with the proposed strategic site allocations on a town-by-town basis. References to documentary sources are provided thus [ ].

Assessment of Legal Compliance

13. Section 19 of the Planning & Compulsory Purchase Act 2004 (as amended) requires development plans to be prepared in accordance with the Local Development Scheme, to have regard to national policies and advice, and to comply with the Statement of Community Involvement. It also requires the Council to carry out a sustainability appraisal of the proposals in the plan and prepare a report of the findings of the appraisal.

14. The Local Development Scheme (LDS) (April 2014) [SD/022; PS/D005] was updated in October 2016 [RH/B002.033], during the course of the examination. The CELPS has been prepared in accordance with the content of these documents, including those which were current when the plan was being prepared and published for consultation, although the timescales for examination and adoption have altered.

15. The adopted Statement of Community Involvement [SD/021] indicates that CEC will consider any representations made on the final plan prior to submission. This was undertaken by CEC's officers under delegated powers, in consultation with the relevant Portfolio Holder, for both CELPS-SD & CELPS-PC, before preparing Statements of Consultation outlining the number of representations and the main issues raised [PS/D003.001]. I deal with issues relating to consistency with national policy and guidance later in my report.

Sustainability appraisal

16. The NPPF (¶ 165) confirms that a sustainability appraisal which meets the requirements of the SEA Directive should be an integral part of the plan preparation process and should consider the likely significant effects on the environment, economic and social factors; further guidance is given in the PPG [ID:11-001-025]. Sustainability appraisal (SA) has been undertaken at all stages during the preparation of the plan, from Issues & Options through to the Town Strategies, Development Strategy, Policy Principles and Pre-Submission version of the plan, culminating in the Sustainability (Integrated) Appraisal (SIA), which accompanied the CELPS-SD [SD/003]. This is a comprehensive document which evaluates the predicted social, economic and environmental effects of the policies and proposals in the submitted plan, along with the mitigation required and reasonable alternatives. Further addenda to the SA were published alongside the CELPS-PC and Main Modifications consultation stages [RE/B006; MM/002].

17. At the hearings, some participants were concerned that the SA work had not considered alternatives to the North Cheshire Growth Village (NCGV) and the release of sites from the Green Belt, along with mitigation and alternative strategies, including options for higher levels of growth. However, CEC has explained where these matters have been assessed, either in the SIA or in other documents [PS/D003.002]. CEC has also considered a wide range of alternative options, not only for the spatial distribution and scale of growth, but also addressing mitigation measures, cumulative impact and assessing alternatives to the NCGV and the release of Green Belt sites. Consequently, I am satisfied that alternative options have been properly appraised in the published documents.

18. In undertaking SA during the earlier stages of the plan-making process, CEC did not consider options involving higher levels of growth above 1,600 dw/yr as reasonable alternatives. However, as part of its forecasting work on the objective assessment of housing needs, CEC undertook a wide range of forecasts involving options up to 1,800dw/yr and 1.2% jobs growth [SD/019], even though these were considered to be unrealistic. During the suspension of the examination, CEC undertook further work to assess all reasonable options and sites, including those put forward by others; these were included in the SA addenda.

19. The choice of reasonable alternatives for environmental assessment is a matter for CEC's judgement as decision-maker, and any shortcomings in this process have been rectified in the subsequent SA addenda. Having considered all the evidence, I am satisfied that all reasonable and realistic options have been fully assessed, including their social, economic and environmental consequences, and that the Sustainability Appraisal work meets the statutory requirements.

Plan-preparation process

20. Some parties have raised legal issues about pre-determination, suggesting that the Plan's strategy was determined before consultation was undertaken on potential additional sites; CEC has addressed these issues satisfactorily [M1.001; Annex 1]. Other parties are concerned about the limited influence that consultation has had on the final plan. However, consultation was undertaken as an iterative process throughout the plan-making process, with the plan being modified after each stage of consultation, even though the basic strategy has remained similar since it was set out in the Development Strategy in January 2013.

21. Both the NPPF and PPG give flexibility in the plan-making process, indicating that future needs and opportunities should be assessed, developing options for

addressing these, identifying a preferred approach, and supporting the plan with robust, focussed and proportionate evidence gathered during the plan-making process to inform the plan rather than being collected retrospectively. In most cases, this guidance has been followed, with discussions and consultations about options for the strategy and site allocations, before refining the plan as preparation has proceeded. Moreover, the background evidence base is comprehensive, most of which was available as the plan-making process continued. The degree and frequency of consultation was extensive, reflecting the localism agenda.

22. At the time the CELPS was originally submitted, some key elements of evidence (such as the Green Belt assessment) were not completed until after key decisions had been made about the strategy (including the release of Green Belt sites), and other evidence (such as detailed highway and traffic assessments for some of the larger strategic allocations) had not been completed. However, following the initial series of hearings, CEC thoroughly reviewed the CELPS-SD and prepared much additional evidence to support and justify the amended strategy in the CELPS-PC; further material was submitted during the course of the examination. By the end of the examination, sufficient evidence had been provided to justify and support the amended policies and proposals in the CELPS-PC, and further more detailed work will be undertaken as the site proposals progress. Consequently, I am satisfied that all the necessary, relevant, available and proportionate evidence was submitted to justify the CELPS by the end of the examination process.

23. At the end of the examination process, legal submissions were made on behalf of Muller Property Group [RH/D026] about the progress and legality of the CELPS and the reliance on the CELPS when determining planning applications. After seeking CEC's views [RH/D027], I have responded separately to the issues raised and concluded that the progress and legality of the examination of the CELPS is not legally flawed and that there is no need for significant new evidence or any further consultation on the CELPS [RH/D028].

24. CEC has produced its own Self-Assessment of Legal Compliance of the CELPS-SD [PS/B005], including consistency with the NPPF and Planning Practice Guidance (PPG). My assessment of these and other aspects of legal compliance of the CELPS is summarised below, and confirms that it meets all the relevant legal requirements.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The CELPS is identified in the latest LDS (October 2016) [RH/B002.033] and earlier versions [SS/054], and its role and content comply with these documents.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in October 2010 [SD/021]. The plan-making and consultation processes met the minimum requirements of the Local Planning Regulations and CEC's adopted SCI, including consultation on Main Modifications.
Sustainability Appraisal (SA)	Adequate SA has been carried out at all stages during the preparation of the CELPS, including at the Publication Draft, Revised Plan and Main Modifications stages [SD/002-003; PS/E042; RE/B006; MM/002]. The Publication Draft was supported by a full SA, and a SA Addendum was prepared at the Revised Plan and Main Modifications stages; the CELPS sets out all the policy links with the SA.

Habitats Regulations Assessment (HRA)	The CELPS was subject to Habitats Regulations Assessment at various stages during its preparation, including at Submission, Revised Plan and Main Modifications stages [SD/004-005; PS/E043; RE/B007; MM/003].
National Policy	The CELPS is consistent with national policy, except where indicated and Main Modifications are recommended.
2004 Act (as amended) and 2012 Regulations	The CELPS complies with the Act and the Local Planning Regulations.
Public Sector Equality Duty (PSED)	The CELPS is consistent with the NPPF in providing for the needs of all sections of the community, including people with disabilities, and I have had due regard to the equality impacts of the Plan with regard to these matters.

Assessment of Duty to Co-operate

25. Section 33A of the Planning & Compulsory Purchase Act 2004 (as amended) requires CEC to co-operate in maximising the effectiveness of plan-making, and to engage constructively, actively and on an on-going basis with neighbouring planning authorities and prescribed bodies when preparing development plan documents with regard to a strategic matter. This is defined as sustainable development or use of land which has or would have a significant impact on at least two planning areas, including sustainable development or use of land for strategic infrastructure.

26. The Duty to Co-operate (DtC) is an on-going requirement throughout the plan-making process, but formally ceases in legal terms when the plan is submitted to the Secretary of State. It does not need to result in agreement between the relevant authorities and prescribed bodies, but local authorities should make every effort to secure the necessary co-operation on strategic cross-boundary matters before the local plan is submitted for examination. The NPPF (¶ 156; 178-182) also indicates that planning should take place strategically across local boundaries and outlines the strategic priorities which may be relevant; it also sets out the soundness tests which require plans to be positively prepared and effective.

27. CEC has submitted extensive evidence outlining how it has engaged constructively, actively and on an on-going basis with neighbouring authorities and prescribed bodies during the course of preparing the plan [SD/013-014; PS/B011-012; PS/B020; PS/B023; PS/B036]. CEC has identified the main strategic priorities of the strategy, including promoting economic prosperity, creating sustainable communities, protecting and enhancing environmental quality, and reducing the need to travel. CEC has also identified the cross-boundary implications of these strategic priorities and addressed cross-boundary strategic issues, including meeting development and resource needs, providing infrastructure, and minimising any adverse impacts of the Plan's proposals on neighbouring areas.

28. Relevant prescribed bodies have been involved in the plan-making process, including Highways England, Environment Agency, Natural England and Historic England. Since many of the outstanding concerns have been resolved, albeit after submission, this does not suggest any fundamental shortcomings in the DtC process as far as these bodies are concerned. Most importantly, none of the neighbouring authorities or prescribed bodies considers that CEC has failed to meet the legal requirements of the DtC.

29. At the time of my initial Interim Views (Appendix 1), my main concern was the nature, extent, effectiveness and timing of co-operation and engagement during the earlier stages of plan preparation; this suggested that the plan-making process was not as positively prepared as it could have been. However, I concluded that CEC had complied with the minimum legal requirements of the DtC. Since that time, no fundamental or compelling new evidence has been submitted which suggests that this conclusion should be reviewed or amended. Furthermore, CEC has continued to engage with prescribed bodies and neighbouring authorities during the course of the examination, particularly when amending the Plan and as a result of consultation. Updated evidence sets out the process and outcome of this engagement [PC/B036].

30. Of course, the DtC is not a duty to agree, and there are several significant outstanding concerns and points of disagreement, not only about the principle of releasing land from the Green Belt, but also about the cross-boundary implications and infrastructure requirements of some of the proposed developments. However, most of these concerns relate to the planning merits, soundness and infrastructure requirements of these proposals, which I deal with later in my report. During the course of the examination, most of these outstanding matters have been resolved, or the issues have been narrowed, or CEC has agreed how they will be resolved, in some cases by agreeing Memoranda of Understanding [RE/F021; PC/B036]. Discussions with all the neighbouring authorities and relevant prescribed bodies are also continuing.

31. In October 2016, after the close of the hearing sessions, the Greater Manchester Spatial Framework (GMSF) [RH/D001] was published. CEC was fully consulted on this draft strategy and, at an earlier stage, the Greater Manchester authorities confirmed that CEC's assessment and release of Green Belt sites should focus on the regeneration issues internal to Cheshire East [RM3.001a]. Issues about the impact of proposed developments in the GMSF will be addressed as part of that plan, and I am satisfied that sufficient engagement and co-operation has been, and will be undertaken as part of the preparation of this emerging plan. There is certainly no need for the CELPS plan-making process to be halted or amended as a result of the recent emergence of the draft GMSF.

32. Consequently, I consider that CEC has engaged constructively, actively and on an on-going basis with neighbouring authorities and prescribed bodies, maximising the effectiveness of the plan-making process, and continuing to do so during the later stages of plan-making. CEC has therefore complied with the minimum legal requirements of the DtC. In coming to this view, I have had regard to relevant legal submissions and legal cases addressing the DtC, along with the guidance in the NPPF and PPG highlighted earlier. Having considered all the evidence and discussions at the hearings, I therefore conclude that CEC has met the legal requirements of the Duty to Co-operate.

Assessment of Soundness

Preamble

33. The CELPS sets out the overall vision and planning strategy for development in Cheshire East up to 2030, including strategic policies, development strategies and site allocations for the main towns. It sets out a vision and strategy for growth, with strategic priorities, along with the overall development strategy, including the proposed amount of employment and housing development, settlement hierarchy, and policies for the Green Belt, Safeguarded Land, Strategic Green Gaps and

Open Countryside. It also sets out strategic policies addressing the economic, environmental and social needs of the area, and identifies strategic site allocations and strategic locations, along with areas of Safeguarded Land, on a town-by-town basis. The CELPS is accompanied by an extensive evidence base, including sustainability appraisals, supporting documents, background papers, technical reports and studies, along with further evidence/statements submitted to the examination. It will be supplemented by a Site Allocations & Development Policies DPD (SADPDPD) and a Minerals & Waste DPD, to provide a comprehensive development plan for Cheshire East, which will eventually supersede the previous local plans.

34. Preparation of the CELPS began in 2009, shortly after local government reorganisation, developing Issues & Options (2010), Town Strategies (2012), Development Strategy & Policy Principles (2013), Additional Sites Consultation (2013) and Pre-Submission Plan (2014), culminating in the Submission version of the Plan (2014) [SD/015]. Further changes to the CELPS-SD were made during the course of the examination, including the CELPS-PC (March 2016). Updates of the Sustainability Appraisal and Habitats Regulations Assessment were published throughout the plan-making and examination process.

35. In preparing the CELPS, CEC has taken account of the wider context of Cheshire East, not only through the formal DtC process, but also through discussions with neighbouring authorities, including Stockport MBC, Greater Manchester Combined Authority and its constituent authorities, Cheshire West & Chester Council and Staffordshire County Council, and also with the Cheshire & Warrington Local Enterprise Partnership (LEP).

36. In considering the soundness of this plan, I have not only had regard to the NPPF & Planning Practice Guidance (PPG), but also taken account of more recent Government and Ministerial statements about planning and plan-making, including amendments to the PPG and the more recent Housing White Paper[1], to which CEC has responded [RH/D021]. Towards the end of the examination process, the draft Greater Manchester Spatial Strategy was published for public consultation. However, this is only an early consultation draft and the final submission version may be different, and so it can have very little weight in my conclusions on the soundness of the CELPS.

Main Issues

37. Taking account of the representations, supporting evidence, written statements and discussion at the examination hearings, there are ten main matters and thirteen key issues upon which the soundness of the CELPS depends.

MATTER 1: SPATIAL VISION AND STRATEGIC OBJECTIVES

Key issue – Is the Vision for Cheshire East justified, effective, locally distinctive and appropriate, and are the Strategic Priorities appropriate, effective, justified and soundly based, and will they help to deliver the vision of the Plan?

38. Section 5 of the CELPS sets out the Vision for the future of Cheshire East, which needs to be seen in the context of the Strategic Priorities which follow. The Vision has evolved during the course of preparing the Plan, following extensive public consultation, and has some support from developers, landowners and local communities. It is consistent with the objectives of the LEP's Business Plan and Strategic Economic Plan (SEP) [BE/123-124], and with the vision and objectives in

[1] Housing White Paper (Fixing our broken housing market) [DCLG; February 2017]

CEC's Sustainable Community Strategy [BE/049], Corporate Plan and various other strategies. It also reflects local characteristics and key features and assets of the Borough, along with the distinctive roles and character of its main towns.

39. The Vision confirms the key element of the strategy in focusing on economic growth and directing most new development to the Principal Towns of Crewe and Macclesfield and the Key Service Centres; this is expanded in the place-specific visions for the main towns in Section 8 of the Plan. It sets out a clear, succinct, positive and aspirational approach which balances the economic, social and environmental elements of sustainable development, reflecting the underlying strategy of the Plan. However, in order to be clear and effective, the Vision should confirm that development has to meet *identified* needs **[MM02]**.

40. The Strategic Priorities cover the economic, social and environmental aspects of spatial planning and sustainable development; they highlight the need to promote economic prosperity, create sustainable communities, protect and enhance environmental quality, and reduce the need to travel. They also recognise the inter-relationships with other places and strategies outside the Borough. The Vision and Strategic Priorities have to be reflected in the strategic policies in the Plan, but with the recommended modification, they provide an appropriate, justified, effective, locally distinctive and soundly based framework for the strategic policies that follow.

MATTER 2: PLANNING FOR GROWTH

41. Section 8 of the CELPS sets out key strategic core policies relating to the overall development strategy, including the overall amount of employment land and housing development proposed, the settlement hierarchy, approach to the Green Belt, Safeguarded Land, Strategic Green Gaps and the Open Countryside, and the spatial distribution of development.

MATTER 2.1: OVERALL DEVELOPMENT STRATEGY

Key issue – Is the Overall Development Strategy for Cheshire East, including the provision for housing and employment land, soundly based, effective, appropriate, locally distinctive and justified by robust, proportionate and credible evidence, particularly in terms of delivering the proposed amount of housing, employment and other development, and is it positively prepared and consistent with national policy?

42. At the heart of the CELPS is CEC's top priority to increase the Borough's economic growth and social well-being in a way which is cohesive and sustainable. The CELPS has a key role in driving and supporting the development of jobs in the Borough and providing the necessary infrastructure and housing which is needed to support that employment, along with the associated business, retail, leisure and other commercial developments which help to deliver the jobs-led growth proposed. Section 4 of the CELPS sets out the case for growth, with specific reasons, and is supported by a wealth of evidence. Having considered all the evidence and discussions, I am satisfied that the case for growth in Cheshire East has been fully established and justified.

43. As originally submitted, the CELPS-SD proposed 300ha of employment land and 27,000 new houses (Policy PG1). However, in my initial Interim Views (Appendix 1), I considered that the economic strategy was unduly pessimistic, particularly the assumptions about economic and jobs growth, and did not seem to fully reflect the proposals and initiatives of other agencies and the extent of site allocations proposed in the submitted Plan. There was also a serious mismatch between the

economic and housing strategies of the CELPS-SD, particularly in the constrained relationship between the proposed level of jobs and the amount of new housing. There were shortcomings in CEC's assessment of housing need, in establishing an appropriate baseline figure and failing to take account and quantify all relevant economic and housing factors, including market signals and the need for affordable housing. In essence, the proposed level of housing provision was inadequate to ensure the success of the economic, employment and housing strategy.

44. CEC subsequently undertook considerable work to address these shortcomings during the suspension of the examination in 2015. After a further series of hearings, in my Further Interim Views (Appendix 2), I considered that CEC had adopted a balanced and rational approach to economic and jobs growth, which is both ambitious and aspirational, yet realistic with a reasonable prospect of success. CEC had also undertaken a comprehensive and objective assessment of housing need for Cheshire East, which makes a significant uplift to the overall housing need to reflect economic factors and provides a balanced level of housing which is aligned with the economic strategy and would fully meet the identified objective assessment of housing needs. The outcome is that Policy PG1 now proposes a minimum of 380ha of land for employment uses and 36,000 new homes between 2010-2030, based on detailed work on establishing a realistic economic growth rate and aligning the housing and employment strategies.

45. Several participants consider that the Plan should cover a longer time period and include a specific commitment to early review. However, when submitted, the CELPS-SD had a full 15-year timeframe, which accords with national policy (NPPF; ¶ 157); it also contains a clear monitoring and implementation framework which sets out the circumstances which might trigger a need for a policy review. CEC has also set out the relationship of the CELPS to High-Speed 2 (HS2) and the circumstances which would trigger a future review of the Plan. The submitted evidence is fully aligned to a Plan period of 2010-2030, and any extension to this timeframe would potentially require much of the evidence base to be reviewed; this would inevitably extend the examination process and significantly delay the adoption of the Plan. In any event, the CELPS is likely to be regularly reviewed, updating and reviewing parts of, or the whole Plan, where needed every five years, as suggested in the PPG [ID-12-008] and more recent Housing White Paper. The CELPS also includes an element of flexibility in terms of housing and employment land provision, and identifies Safeguarded Land for possible future development. In these circumstances, I consider a specific commitment to review the CELPS or extend its timescale is unnecessary and unjustified.

Economic strategy and employment land requirements

46. In my Further Interim Views (Appendix 2), I set out my assessment of the soundness of the economic strategy and employment land requirements, and concluded that the recommended jobs growth rate of 0.7%/year was ambitious and aspirational, yet realistic and deliverable. CEC has set out the assumptions and evidence supporting its judgements, with clear reasoning covering all the main economic factors. The CELPS-PC has properly addressed the balance between new employment and housing development, as well as the qualitative and quantitative aspects of employment land provision, and consistency with the LEP's SEP. Since that time, although these matters were discussed at the resumed hearings and raised in the representations at Main Modifications stage, there has been no fundamental or compelling new evidence which suggests that the level of economic growth proposed in the CELPS-PC is unrealistic, unsustainable or undeliverable, or which suggests that my earlier conclusions about the economic strategy and

employment land provision need to be reviewed. There are, however, several issues that need to be addressed, which came to greater prominence in the later stages of the examination.

47. Firstly, the continued evolution of High Speed 2 (HS2). The longer term implications for economic growth related to the HS2 proposals have not been finalised and are assumed to take place towards the end of the current plan period. Like CEC, I consider that these matters would more appropriately be addressed when the CELPS is reviewed. CEC has considered the implications of recent Government announcements which envisage advancing the timescale for the northern section of HS2 between Birmingham and Crewe, but the full benefits of HS2 will only be known when full details have been announced of how a hub station at Crewe will operate.

48. Secondly, no fundamentally different forecasts of future economic growth have been submitted. Those based on the emerging devolution bid cover a much longer timeframe and assume decisions are made on key projects such as HS2; they would be more appropriately considered in a future review of the CELPS. Similarly, work on the LEP's Northern Gateway Partnership and the review of the SEP is at an early stage and the employment figures have not been finalised. Greater Manchester's Spatial Framework (GMSF) has not been finally determined, but confirms that Greater Manchester currently intends to meet all its employment needs within its own area.

49. Thirdly, the revised estimate of employment land requirements points to a need for some 380ha of employment land, an increase from 300-351ha in the submitted Plan. However, this only partly addresses the need to provide new jobs, since it only covers Class B1, B2 & B8 uses. The additional land proposed would only cater for some 21,800 new jobs, but the remainder would be taken up by jobs located elsewhere in sectors such as retail, health, education, leisure, tourism, home-working and self-employment. There is some dispute about the assumptions of employment land lost to other uses and the 20% flexibility factor, representing over half the additional amount of employment land proposed. However, land losses continue to average around 6ha/year and the 20% flexibility allowance is at the lower end of the options considered, ensuring a range and choice of sites.

50. Some participants still consider the overall provision of employment land is too high, pointing to the relatively low rates of take-up of new employment land in recent years. However, past rates of take-up of employment land may not necessarily reflect what may happen in the future, particularly with an overall strategy which aims for economic growth. Even though significant growth in jobs seems to have taken place since 2010, it is not surprising that the take-up of employment land has been at a relatively low level in the past, due to economic factors and the fact that several of the proposed employment sites have not yet been formally allocated, some of which currently lie in the Green Belt. To promote and achieve economic growth requires a portfolio of readily available and developable land to meet the needs of all business sectors, particularly where such land and uses competes with other parts of the sub-region. Others seek the allocation of more employment land, but this could have unprecedented and unsustainable implications for cross-boundary commuting and migration, as well as being unrealistic and undeliverable. In my view, CEC has taken a balanced and realistic approach to its proposed provision of employment land.

51. Some participants refer to the uncertainty which may be caused by "BREXIT". However, so far, the impending withdrawal of the United Kingdom from the European Union seems to have had little direct effect in reducing national economic growth. Until the results of the international negotiations about this matter are finally determined, it is far too early to predict the likely consequences. In any event, the appropriate strategy is to plan positively for economic growth, rather than to assume that such economic growth will not occur. The situation can be reviewed when the implications of BREXIT are clearer and national/regional economic growth forecasts have been reviewed.

52. Some parties question whether the needs of specific business sectors have been fully considered, including provision for logistics uses. However, logistics uses are related to wider sub-regional needs and have cross-boundary implications, including competing sites. In any event, the proposed employment land provision in the CELPS-PC includes an allowance for Class B8 uses, including logistics. CEC has undertaken a detailed assessment of the needs of the logistics sector [PS/E032; RE/F020], which reviewed logistics provision within the wider sub-region (including Greater Manchester and the Potteries) and concluded that sufficient provision exists to meet the forecast demand for some 72.55ha of logistics uses within Cheshire East. There are issues about the growth rates assumed for the Class B8 sector, the proportion of off-site jobs for transport and storage sector, employment densities and the flexibility rate for land used by the logistics sector. However, CEC has clearly set out its methodology and reasoned assumptions, and identified a range of potential sites which could accommodate logistics uses to address the needs of Cheshire East, rather than the wider sub-region [PCM.2.001-1a]. Given the likely provision of sites for logistics uses over this wider area, I can see no compelling case for any further provision to be made within Cheshire East to meet the district's needs for the logistics business sector.

53. Other parties seek additional provision for the science and technology sector, to deliver the objectives of the Cheshire Science Corridor, as part of a case to allocate land at Cheshire Gateway for such uses (see later in my report). However, the CELPS-PC specifically allocates the Alderley Park site for such uses, which is within the Cheshire Science Corridor and is now identified as an Enterprise Zone (EZ), focused on existing employment sites. As CEC explains [MM/009], there is no specific legal requirement to review the CELPS prior to its adoption due to the designation of this EZ; the designation of this EZ certainly provides no justification to release further land from the Green Belt (such as Cheshire Gateway) to make provision for science and technology uses. Consequently, there is no need to include a specific policy relating to science and technology uses at Cheshire Gateway or elsewhere, given the existing provision proposed in the CELPS-PC for such uses; this is a matter best addressed in a future review of the CELPS.

54. In terms of deliverability, the CELPS-PC aims to provide over 386ha of new employment land, including over 46ha of committed land, over 322ha at the proposed strategic sites and some 15ha of land to be identified in the SADPDPD. This total includes an allowance for future losses of employment land and includes a 20% flexibility rate, as well as identifying a wide range of specific sites mainly located at the Principal Towns and Key Service Centres, supplemented by the Local Service Centres and the smaller settlements in the rural areas. I deal with site-specific issues and the spatial distribution of employment land later in my report.

55. In overall terms, the proposed level of provision represents an appropriate and flexible supply of employment land to enable the delivery of economic growth, which is justified by the supporting evidence. The monitoring framework includes

key targets to monitor the provision and loss of employment land, with triggers to suggest a review of particular policies. The CELPS includes a clear economic vision for the area, which positively and proactively encourages sustainable economic growth, identifies specific strategic employment sites, supports existing business sectors, plans positively for promoting and expanding business clusters in the Cheshire Science Corridor, identifies priority areas for economic regeneration and infrastructure provision, and avoids the unnecessary long-term protection of employment sites. It also considers the cross-boundary implications of the economic strategy, including Atlantic Gateway, Airport City, Liverpool Superport & Omega South, as well as other economic initiatives of the Northern Gateway and the possible impact on the economic strategies of neighbouring authorities. This approach will help to effectively deliver the economic and employment strategy of the CELPS and aligns well with national policy (NPPF; ¶ 21-22).

56. Having considered all the evidence, discussions and statements at the hearing sessions, I conclude that CEC has adopted a balanced and rational approach to economic and jobs growth, which is both ambitious and aspirational, yet realistic and with a reasonable prospect of success; it balances migration and commuting to ensure sustainable movements and patterns of development, and is based on up-to-date, proportionate and robust evidence. CEC has also considered all the relevant economic factors, including the likely future economic performance of Cheshire East and future employment land requirements. The revised economic strategy, including the proposed job growth rates, numbers of new jobs and additional employment land, with detailed migration and commuting models, has been discussed as part of the DtC process. It not only aligns with the LEP's economic plans and strategies, but also takes account of recent employment projections and likely trends. There is also a more direct relationship and closer alignment between the economic and housing strategy than in the CELPS-SD, which is justified, positively prepared and soundly based.

Housing need and requirement

57. The assessment of housing need requires assumptions and judgements to be made about various trends, based on a variety of empirical evidence, for which there is no one set of data or methodology which will give the "right" answer. The NPPF (¶ 14; 159) confirms that plans should fully meet the objectively assessed needs for market and affordable housing unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF's policies, including specific constraint policies. The PPG [ID-2a] sets out good practice and confirms that establishing future housing needs is not an exact science; DCLG's household projections are the starting point for assessing overall housing need, which can be adjusted to reflect local circumstances, such as demography, migration and household formation, along with housing factors, such as market signals, and economic factors, including economic projections and jobs.

58. In my initial Interim Views (Appendix 1), I highlighted the apparent mismatch between the economic and housing strategies of the submitted Plan, particularly in the constrained relationship between the proposed level of jobs and the amount of new housing. As a result, CEC commissioned consultants to undertake an updated assessment of housing needs in the *Housing Development Study* (HDS) [PS/E033], with further information provided during the examination. This establishes an objective assessment of housing need (OAN) of 36,000 new homes, equivalent to 1,800 dw/yr over the Plan period (2010-2030). This represents an increase from 27,000 new homes proposed in the CELPS-SD, and now includes 2,185 additional units of elderly persons (C2) accommodation, a revised assessment of affordable

housing need and excludes the previous provision of 500 dwellings for High Peak BC, which is no longer needed. The resulting OAN incorporates an uplift of some 65% above the base demographic need (22,000 homes), to reflect the proposed economic growth rate (0.7% jobs growth/year) and the need to provide sufficient homes for the employees needed to take up the additional 31,400 new jobs proposed; CEC considers that this is more than enough to reflect market signals, the need for affordable housing and other social, economic and housing factors.

59. In my Further Interim Views (Appendix 2), I considered that CEC had undertaken a comprehensive and objective assessment of housing need for Cheshire East, which uses the DCLG household projections as its starting point, adjusted to reflect local circumstances, considers housing factors, including market signals, and addresses the need for affordable housing, accommodation for the elderly and the needs of specialist groups in the community; the inclusion of C2 accommodation reflects the approach in the HDS. It also makes a significant uplift to the overall housing need to reflect economic factors, including future rates of economic/job growth, which results in a need for more migration and commuting into Cheshire East to provide the extra workers to take up the additional jobs. The overall housing requirement figure of 36,000 additional homes would provide a balanced level of housing provision, which is aligned with the economic strategy and would fully meet the reasonably established OAN. Since that time, although these matters were discussed in the resumed hearings and raised in the representations at Main Modifications stage, there is no fundamental or compelling new evidence which suggests that these conclusions should be reviewed. However, there are some particular issues which need to be addressed, some of which relate to specific new matters raised since my Further Interim Views were published.

60. Firstly, CEC has reviewed the OAN in the light of more recent DCLG 2014-based household projections [PC/B032]. This comparative assessment shows a reduction of around 4% in the number of homes needed between 2010-2030 (to 34,400 overall or 1,720 dw/yr). This is a very modest reduction, and since household projections are likely to change over time, the latest projections do not signal a meaningful change in housing need or represent a compelling reason to replace or review the extensive evidence already undertaken by CEC to establish the OAN. I also note that the PPG [ID-2a] confirms that, although a meaningful change in the housing situation should be considered in the context of the latest available information, it does not automatically mean that housing assessments are rendered outdated every time new projections are issued.

61. Secondly, the deliverability of 1,800 new dw/yr will be challenging, particularly given current and past rates of performance, but is partly dependent on the number and range of sites available and allocated for development. Past rates of housing completions have ranged from 464 dw/yr (2010-11) to almost 1,500 dw/yr (2005-06), averaging around 1,000/year, but recent years have seen an upturn, with the latest figures reaching over 1,540/year (2015-16); this reflects the larger sites that are now being developed and the opportunities to access sites across the Borough. Much will depend on housing supply and the ready availability of a range of sites, which I deal with later in this section of my report.

62. Thirdly, both the Housing & Planning Act and the recent Housing White Paper include provisions which may affect the definition and provision of affordable housing, as well as the methodology of establishing the OAN. However, these changes have not yet been incorporated into national policy and would be more appropriately addressed through a future review of the CELPS. Similarly, as with the economic and employment strategy, the implications of "BREXIT" for housing,

including future needs, trends and migration are not yet known. So far, there is little sign of any weakening of demand or supply in the housing market; in fact, the latest figures suggest the opposite. CEC has fully considered the relationship with neighbouring housing markets and the cross-boundary implications of its housing strategy on adjoining authorities, including migration and commuting, as confirmed in my Further Interim Views (Appendix 2). The subsequent publication of the GMSF does not significantly affect the housing strategy or requirement for Cheshire East. In determining the appropriate housing requirement figure, CEC has also considered the implications of constraint policies, such as the Green Belt, in assessing a range of alternative options to fully meet objectively assessed housing needs [RM1.001/a; RE/B011; PS/E031a.4; RE/D026; RE/D029].

63. Having considered all the evidence, discussions and statements at the hearing sessions, and taking account of my earlier conclusions in my Further Interim Views, I conclude that CEC has reached a reasonably balanced judgement about the relationship between new jobs and homes, which is supported by the evidence and would result in sustainable levels of migration and commuting and patterns of development, in line with the guidance in the NPPF and PPG [ID-2a-018]. A housing requirement figure of 36,000 new homes (2010-2030) is therefore soundly based, and no new or compelling evidence is available which alters these conclusions.

Housing land supply

64. The NPPF (¶ 47) confirms that local authorities should identify a 5-year supply of specific, deliverable sites against their housing requirements, along with an additional buffer of 5% to ensure choice and competition, or 20% where there has been a record of persistent under-delivery; a supply of specific, developable sites or broad locations for growth should also be identified for years 6-10, and where possible for years 11-15. Ensuring an adequate supply of housing land has been contentious in Cheshire East for several years, with some planning appeals having been allowed partly on the basis of inadequate housing land supply.

65. Housing land supply was not covered in my earlier Interim Views, since the latest figures and assessments were not available. This issue was discussed regularly throughout the examination hearings, with developers, housebuilders and local communities challenging the deliverability of specific sites, particularly the larger strategic sites. By the end of the hearings, CEC had undertaken a considerable amount of work to establish the timescale and deliverability of its housing land, including those strategic sites proposed in the CELPS-PC.

66. For Cheshire East, the overall provision of 36,000 new homes equates to 1,800 units/year, which with a 20% buffer to reflect past under-provision would amount to 10,800 new homes over the next 5-year period. The latest assessment (March 2016 [PC/B037]) confirms CEC's assessment of 5-year housing land supply as 15,535 units, equating to 5.3 years supply. However, this is based on an approach which aims to meet past under-delivery within 8 years (which CEC refers to as "Sedgepool 8"), rather than within the 5 year period referred to in NPPF/PPG.

67. For the overall Plan period, CEC now proposes a total housing provision of 39,560 units, made up of 5,473 completed units, 10,822 commitments, 18,555 units on strategic sites and 3,335 units to be identified in the SADPDPD, along with an allowance of 1,375 units on small windfall sites; this represents a flexibility factor of almost 10%. Almost 23,000 homes (over 60% of the total provision) are completed or committed, including over one third of the strategic sites. More recent information confirms that over 2,000 new units have been permitted

between 01/04/16-31/10/16, including almost 900 units allowed on appeal [RH/D003/a], confirming an active and healthy housing market.

68. At a local plan examination, it is important to establish the basis of future housing land supply, both for 5-year supply and throughout the Plan period. Firstly, CEC has acknowledged that, at present, it is unlikely to be able to demonstrate a 5-year supply of housing land. However, with the identification and endorsement of the strategic site allocations included in the CELPS-PC, this situation should be resolved, particularly with the abandonment of the phasing policy included in the original CELPS-SD. Much will depend on whether the committed and proposed housing sites come forward in line with the anticipated timescale and amended housing trajectory. Although there may be arguments about specific sites, developers and landowners have confirmed the capacity, timescale, viability and deliverability of almost all the proposed strategic site allocations.

69. CEC has undertaken much detailed work in establishing the timescales and delivery of these sites, including setting out the methodology for assessing build rates and lead-in times, using developers' information where available and responding to specific concerns [PS/B037]. Although there may be some slippage or advancement in some cases, I am satisfied that, in overall terms, there are no fundamental constraints which would delay, defer or prevent the implementation of the overall housing strategy. The monitoring framework also includes specific indicators related to housing supply with triggers to indicate the need for review. I deal with site-specific issues later in my report on a town-by-town basis. On the basis of the evidence currently available, I am satisfied that CEC has undertaken a robust, comprehensive and proportionate assessment of the delivery of its housing land supply, which confirms a future 5-year supply of around 5.3 years.

70. However, this figure is based on other assumptions and approaches about the overall provision of housing land, including meeting past under-delivery. Due to the previous under-supply of housing against the relevant requirement, CEC agrees to apply a 20% buffer to the first 5-year housing requirement figure. This is a challenging situation, particularly given past and current rates of housing delivery. Any backlog in housing provision should usually be met within the first 5 years of the plan period (the "Sedgefield" method), but where that approach would result in unrealistic and undeliverable rates of housing provision, a longer time period may be justified (the "Liverpool" approach) if neighbouring authorities cannot assist in fully meeting the proposed housing provision level.

71. CEC has fully set out the implications of adopting the "Sedgefield" and "Liverpool" approaches, and its preferred "Sedgepool 8" approach [PC/B037]. This essentially relates to the annual rate of housing completions that would be needed, depending on whether the "Sedgefield" or "Liverpool" approach is adopted. For the former, it would require over 3,400 dw/yr (including buffer) to be identified during the next 5 years, which would require a 275% increase in completions above the highest recent figures recorded and the allocation of 80 additional sites; it would also affect the overall spatial distribution and amount of development, and significantly exceed housing need, out of balance with economic growth, as well as increasing the pressure to release more land from the Green Belt and affecting more high-grade farmland. It is also questionable whether the housebuilding industry would have the capacity and resources to deliver this significantly increased provision, or that demand would exist for the additional homes provided. In summary, the increased level of housing provision required would be unrealistic and undeliverable, and store up problems of under-delivery for the future and delay the adoption of the CELPS-PC.

72. On the other hand, meeting the backlog of previous under-delivery over the whole of the remaining plan period (the "Liverpool" approach), would require just over 2,600 dw/yr (including buffer) over the first 5-year period. This level of housing provision would be achievable and realistic, but it would unduly delay meeting past under-delivery and would not represent an ambitious approach to boosting housing supply as required in national policy. CEC therefore proposes to fully meet the past under-delivery of housing within the next 8 years of the Plan period ("Sedgepool 8"). This would require some 2,940 dw/yr (including buffer) over the next 5 years, which would be ambitious, but realistic and deliverable, as well as boosting housing supply without needing further site allocations [RH/B002.043]. Both the "Sedgefield" and longer "Liverpool" approaches have been endorsed by inspectors examining other plans, and I consider this represents the most appropriate, realistic and deliverable approach for Cheshire East. Progress will be reviewed regularly, as part of monitoring and, if necessary, could be adjusted in future reviews, depending on delivery rates.

73. Several participants considered that CEC has taken insufficient account of the number of windfall sites likely to come forward during the plan period. The CELPS-PC includes an allowance for windfall sites within the urban areas of Crewe and Macclesfield, and the Urban Potential Study [PS/E039] examined the capacity of the main urban areas to deliver windfall sites. At my request, CEC reviewed the situation and now agrees to include an allowance for small windfall sites (of 9 units or less) of 125 units/annum (excluding Crewe and Macclesfield) from 2019/20 onwards. This is based on evidence of consistent delivery of housing from such sites since 2009/10, and amounts to some 1,375 additional units [PC/037]. Some parties seek higher or lower figures, and query the accuracy of CEC's assessments of existing completions and windfall sites, particularly at Macclesfield, Knutsford and Poynton. However, I am satisfied that CEC's recording of completions is reliable and consistent; any missing sites will be taken into account as part of the regular monitoring process. Moreover, CEC's estimate of future windfall sites is both reasonable and realistic, and is based on sound, robust evidence.

74. Some participants suggest increased flexibility in housing provision by allocating additional sites or identifying "reserve" sites. However, the CELPS-PC, as amended, already proposes a total number of homes well in excess of the housing requirement figure (with an overall flexibility factor of almost 10%), and further housing sites to meet this provision may come forward in the SADPDPD and future neighbourhood plans. CEC has set out a robust and well-reasoned justification for dealing with housing provision and flexibility, and I can see no compelling reason to allocate additional sites or identify "reserve" sites in this case.

75. CEC has drawn up a revised housing trajectory, based on its assessments of the delivery and timescales of the main components of housing supply, including the proposed strategic housing sites [PS/B037]. This shows the annual delivery rates, including significantly increased rates of housing completions between 2016/17-2024/25, ranging from 2,000 to over 3,500 dw/yr, fully meeting the required delivery rates. Although these higher delivery rates will be challenging and ambitious, the CELPS-PC includes sufficient committed and allocated sites to ensure that the Plan can be implemented, with adequate choice and flexibility.

76. On the basis of the evidence before me, I conclude that the CELPS-PC, as updated and amended, would provide a realistic, deliverable and effective supply of housing land, to fully meet the objectively assessed housing requirement, with enough flexibility to ensure that the housing strategy is successfully implemented.

Similarly, CEC should be able to demonstrate that there is at least a 5-year supply of housing land when the CELPS is adopted.

77. However, in the detailed wording of Policy PG1, it is necessary to confirm that the overall level of housing provision is a *minimum* of 36,000 homes between 2010-2030, in order to ensure that there is no ceiling on the provision level and ensure consistency between Policies PG1 & PG6. It is also necessary to confirm that CEC has considered the implications of the DCLG 2014-based household projections and update housing land supply figures (Table 8.2), clarifying the elements of housing land supply, including a windfall allowance, but deleting the erroneous Tablenote 3 to Table 8.2 **[MM03]**. Amendments are also needed to the schedule of housing provision (Appendix A) to update and clarify the components of provision, and to the Housing Trajectory **[MM87]**. Other amendments are needed to the Key Diagram, to reflect the revised area/site proposals contained in the amended CELPS-PC, in this small-scale summary diagram **[MM01]**. These modifications would ensure that the plan is effective, up-to-date, deliverable and consistent with national policy. CEC may also make Additional Modifications to clarify and correct specific sites on the illustrative Key Diagram.

78. With these recommended modifications, I consider the Overall Development Strategy for Cheshire East, including the provision for housing and employment land, is soundly based, effective, deliverable, appropriate, locally distinctive and justified by robust, proportionate and credible evidence, and is positively prepared and consistent with national policy.

MATTER 2.2: PLANNING FOR GROWTH – SETTLEMENT HIERARCHY

Key issue:
Are the Settlement Hierarchy and Visions for each town and settlement appropriate, effective, locally distinctive, justified and soundly based, and are they positively prepared and consistent with national policy?

79. The settlement hierarchy in CELPS-PC Policy PG2 remains as originally proposed in the CELPS-SD. Apart from a few of the smaller settlements, there is general support for the proposed settlement hierarchy, establishing the Principal Towns of Crewe and Macclesfield, Key Service Centres (KSC) and Local Service Centres (LSC). This settlement hierarchy recognises the size, scale and function of the various towns, as well as their future role in the development strategy. In my earlier Interim Views (Appendix 1), I considered the proposed settlement hierarchy is appropriate, justified and soundly based, and no new evidence has been put forward since then to justify any further changes to the settlement hierarchy as set out in Policy PG2. However, I need to address some specific points about particular settlements made during the later stages of the examination.

80. In my Interim Views (Appendix 1), I addressed the points raised about enhancing the status of Congleton to a Principal Town, the suggestion of an upper tier of KSCs, and the status of Handforth, Holmes Chapel, Alderley Edge and smaller settlements such as Wybunbury and Rode Heath. No new evidence has been submitted which suggests that my conclusions on the status of these settlements should be amended and this matter can be considered again at future reviews of the CELPS. The proposed amendment relating to the NCGV does not preclude a review of its status in the settlement hierarchy in the future.

81. There remains some local concern about the status of Goostrey as a LSC, which looks to Holmes Chapel for some of its facilities, and is constrained by its proximity to Jodrell Bank. However, there is little to suggest that these local characteristics

undermine its current or future role and function as a LSC, and the Plan already confirms that its future development needs should be largely provided for at Holmes Chapel. CEC puts forward a few minor amendments to the vision and policy for the LSCs and Other Settlements & Rural Areas **[MM04]**, which clarify the scale of development and ensure a consistent approach to development in the smaller settlements, reflecting the wording in Policy PG2. No further modifications are needed to this policy or the supporting text in the interests of soundness.

82. Consequently, I conclude that the Settlement Hierarchy and Visions for each town and settlement are appropriate, effective, locally distinctive, justified and soundly based, and are positively prepared and consistent with national policy.

MATTER 2.3: PLANNING FOR GROWTH - SPATIAL DISTRIBUTION OF DEVELOPMENT

Key issue:
Is the Spatial Distribution of Development and Growth to the various towns and settlements appropriate, effective, sustainable, justified with robust evidence and soundly based, and does it reflect the overall strategy of the Plan?

83. Policy PG6 is a key policy setting out the spatial distribution and scale of proposed development at the Principal Towns, Key Service Centres, Local Service Centres and Other Settlements & Rural Areas. In my Further Interim Views (Appendix 2), I considered that the revised spatial distribution of development represents a realistic, rational and soundly-based starting point for the spatial distribution of development; it is justified by a proportionate evidence base and takes account of the relevant factors, including the crucial importance of the Green Belt and the outcome of other studies undertaken during the suspension period. It is also based on sound technical and professional judgements and a balancing exercise, which reflects a comprehensive and coherent understanding of the characteristics, development needs, opportunities and constraints of each settlement. Since that time, there is no fundamental or compelling new evidence which suggests that these conclusions should be reviewed. However, several matters need to be addressed which gained greater prominence in the resumed hearings and were raised in the representations at the Main Modifications stage.

84. Many participants challenge the revised spatial distribution of development, but it is important to note that CEC's Spatial Distribution Report (SDUR) [PS/E035] is the only evidence that comprehensively addresses all the relevant factors relating to a soundly-based spatial distribution of development for all of the settlements in the hierarchy and uses these to identify an clear, logical and consistent approach to apportioning the amount of proposed development across the district. Any increase or decrease in the amount of development proposed for a particular town would have to be offset or made up by decreases or increases in other towns, since there is no justification to increase or decrease the overall level of proposed provision; this would almost inevitably affect the number and location of greenfield or other sites in the Green Belt, which would raise other and sometimes controversial issues. It is also important to recognise the particular development constraints affecting each town, including the Green Belt around Macclesfield and the northern towns. Moreover, additional development is not needed to meet the overall level of development requirements currently identified.

85. Although there remain some concerns about the spatial distribution of development, particularly to the northern towns constrained by the Green Belt, no new evidence or information has been presented which is sufficient to counter

my previous conclusions that the revised spatial distribution is appropriate, fully justified, reasonable, proportionate and soundly-based.

Principal Towns & Key Service Centres

86. As regards the Principal Towns, the updated CELPS-PC now allocates some 7,700 new homes and 65ha of employment land to Crewe and some 4,250 new homes and 20ha of employment land to Macclesfield, with a flexibility factor for housing of 8.4% and 1.8% respectively. This allocation properly reflects development proposals, opportunities and constraints in and around these larger towns and focuses over a third of the total number of homes and over 20% of the total employment land provision to the Principal Towns; this reflects their size, status and role in the spatial strategy.

87. For the 9 KSCs, the updated CELPS-PC now allocates a total of 17,600 new homes and 225ha of employment land, equating to over 50% of the total number of homes and 60% of the total employment land provision, with flexibility factors for housing ranging from 2.6-9.3%. This also properly reflects the development proposals, opportunities and constraints in and around these towns, including the Green Belt around the northern settlements, and the sizes, status and roles of these towns in the spatial strategy.

Local Service Centres

88. The CELPS-PC allocates 3,500 homes and 7ha of new employment land to the LSCs, with a flexibility factor of 7.1% for housing and equating to 9.7% and 1.8% respectively of the total amount of new housing and employment land. This level of provision recognises their lower position in the settlement hierarchy and the more limited availability of infrastructure, services and facilities, along with other constraints, including Green Belt, Strategic Green Gaps and highways capacity. Since some development has occurred in the past, the balance of development (1,125 homes/3.56ha of employment land) would be identified in the SADPDPD.

89. The vision and strategy of the CELPS confirms that some modest growth will take place at the LSCs to meet locally arising needs and priorities where they contribute to maintaining sustainable communities. Some participants seek increased amounts of development for specific settlements, particularly for new housing. However, in view of the overall strategy of directing most new housing and employment development to sustainable and accessible settlements such as the Principal Towns and KSCs, I am satisfied that the overall proportion of new housing and employment development allocated to the LSCs is reasonable, realistic, justified, proportionate and soundly based.

90. Some participants argue that the total amount of development allocated to the LSCs should be apportioned between the various settlements. However, this is a matter more appropriately considered by the SADPDPD, when more information about potential site options becomes available. CEC confirms that a methodology for apportioning growth to the LSCs will be published as part of the preparation and consultation on the SADPDPD, particularly since the SDUR did not consider disaggregation of growth across the Borough at or below the LSC level in the settlement hierarchy. Neighbourhood Plans will also have a part to play in identifying development opportunities at the LSCs and rural settlements. To clarify the situation in the supporting text, CEC intends to confirm that the figure for LSCs will be disaggregated in the SADPDPD and/or Neighbourhood Plans, with references to "made" Neighbourhood Plans in the key evidence **[MM09]**. This will ensure that the policy is clear, effective and consistent with national policy.

Other Settlements and Rural Areas

91. The CELPS-PC allocates 2,950 new homes and 69ha of new employment land to the Other Settlements and Rural Areas, including development at the Alderley Park Opportunity Site and Wardle Employment Improvement Site, which I deal with later in my report. In terms of the number (110+) and small size of these rural settlements, this seems to be a reasonable and proportionate allocation, which accords with CEC's SDUR and reflects the need to provide some homes and jobs to meet local needs, as well as their lower position in the hierarchy and local constraints. Since some new development has occurred in the recent past, the balance of development (1,250 homes and 4ha of employment land) would be identified in the SADPDPD and forthcoming Neighbourhood Plans. No further modifications are therefore needed to settlements in this category of the hierarchy.

92. Consequently, with the recommended modification, I conclude that the Spatial Distribution of Development and Growth to the various towns and settlements is appropriate, effective, sustainable, justified with robust evidence and soundly based, and fully reflects the overall strategy of the Plan. I deal with specific issues relating to particular settlements on a town-by-town basis, later in my report.

MATTER 2.4: PLANNING FOR GROWTH – GREEN BELT, SAFEGUARDED LAND, STRATEGIC GREEN GAPS AND OPEN COUNTRYSIDE

Key issue:
Is the approach to the Green Belt, Safeguarded Land, Strategic Green Gaps and the Open Countryside appropriate, effective, positively prepared, justified, soundly based and consistent with national policy?

Green Belt

93. Policy PG3 sets out the purposes of the Green Belt and the approach to development within it, and also lists the sites which are proposed to be removed from the Green Belt for development or Safeguarded Land. The general policy is unchanged from that included in the CELPS-SD, other than updating the list of sites and deleting the reference to a new Green Belt around Crewe as a result of new evidence and in response to my Interim Views (Appendix 1). The general approach to the Green Belt reflects current national policy (NPPF; ¶ 79-92), but the outcome of more recent consultations on proposed amendments to the NPPF relating to the Green Belt and the implications of the recent Housing White Paper are not yet known; it will be for CEC to consider the implications of any changes to national planning policy, including the Green Belt, in future reviews of the CELPS and in preparing the SADPDPD.

94. CEC's proposals for releasing land from the Green Belt for development or Safeguarded Land around the main towns is very contentious, especially for many local communities. However, in my earlier Interim Views, I considered that CEC has provided sufficient evidence to establish the exceptional circumstances needed to justify altering Green Belt boundaries; this is essentially based on the need to allocate sufficient land for market and affordable housing and employment development, combined with the adverse consequences for patterns of sustainable development of not doing so, since it is not practicable to fully meet the assessed development needs of the area without amending Green Belt boundaries.

95. At submission stage, there was some concern that the justification for releasing land from the Green Belt was inadequate and inconsistent. In my initial Interim Views (Appendix 1), I considered that the process and evidence relating to the proposed amendments to the Green Belt boundary in the north of the district

seemed flawed, particularly the release of sites from the Green Belt and the provision of Safeguarded Land; there was also insufficient justification for the proposed new area of Green Belt around Crewe. However, during the suspension of the examination, CEC undertook more work to address these matters.

96. In my Further Interim Views (Appendix 2), I considered that the approach and content of CEC's updated Site-Selection Methodology and Green Belt Assessment (GBAU) [RE/F010; PS/E034] reflected national policy and other guidance in the NPPF & PPG; it provided a set of objective, comprehensive and proportionate evidence to inform CEC's selection of Green Belt land, which addressed most of the earlier shortcomings of the previous Green Belt assessment without "retro-fitting" the evidence. It not only addressed the need to demonstrate exceptional circumstances, but also considered alternative options to releasing Green Belt land, assessed sites against the purposes of the Green Belt, and considered the selection of sites in a sequential manner, prioritising non-Green Belt sites before considering Green Belt sites based on their contribution to Green Belt purposes; this included assessing their contribution to urban regeneration and took account of the assessment of the potential of brownfield/windfall sites likely to come forward within the urban areas [PS/E039].

97. The GBAU included a strategic assessment of 44 general areas in the Green Belt throughout Cheshire East, as well as a more detailed assessment of over 400 smaller parcels of land, to provide a key input into the site-selection process. CEC also updated and clarified the final assessment of some sites in response to criticisms of others. No other evidence has comprehensively assessed the opportunities for releasing Green Belt land and no new evidence or information was presented at the later hearings or in further representations to alter these conclusions. I deal with the site-specific aspects of proposed releases of land from the Green Belt on a general and town-by-town basis, later in my report; I also understand that the SADPDPD will consider the possibility of identifying further smaller scale releases of land from the Green Belt, if exceptional circumstances can be demonstrated, in line with the site-selection methodology. I deal with the issue of the new Green Belt originally proposed around Crewe later.

98. Consequently, and having considered all the evidence and discussions on the Green Belt issue, I consider that CEC's general approach to the Green Belt and the selection of sites is appropriate, fully justified, effective, soundly based and consistent with national policy. However, the list of sites in the policy and the general extent of the existing Green Belt (Fig 8.1) need to be amended to reflect CEC's latest proposals, including the deletion of Sites CS51 & 64 **[MM05]**. With these recommended modifications, the overall approach to the Green Belt set out in Policy PG3 is soundly based and consistent with national policy.

Safeguarded Land

99. Policy PG4 sets out CEC's approach to identifying Safeguarded Land, confirming that development will not be permitted in such areas unless it is justified through a review of the CELPS, and designating the sites identified as Safeguarded Land. The Policy remains unchanged from that in the CELPS-SD, apart from updating the list of sites and deleting the reference to identifying further Safeguarded Land in Poynton, and its approach is consistent with national policy (NPPF; ¶ 85). The CELPS-PC proposes to release some 200ha of land from the Green Belt for Safeguarded Land in the north of the Borough, which is justified in the supporting evidence (SLTA) [PS/E031a.5]; various options for the distribution of Safeguarded Land were also considered by CEC [RE/F010; Appx 2]. The overall amount of

proposed Safeguarded Land is intended to meet longer-term development needs stretching well beyond the end of the current plan period; in fact, taking account of other sources of land, it should be sufficient for another full 15-year period beyond 2030, so that the Green Belt boundary defined in the CELPS-PC will not need to be amended until at least 2045.

100. Some participants are concerned that the overall amount of proposed Safeguarded Land is inadequate to meet future development needs, but as confirmed in my Further Interim Views (Appendix 2), I consider CEC has taken a balanced and cautious approach to the amount of Safeguarded Land to be identified, which seems to be logical, rational, effective and justified by the supporting evidence; CEC has also justified the exceptional circumstances needed to release Green Belt land to provide Safeguarded Land. Since then, no new evidence has been presented to alter this conclusion.

101. Some participants are concerned about the spatial distribution of Safeguarded Land, pointing out that Macclesfield has over 50% of the total amount of such land. However, CEC has fully explained the process and methodology used in selecting and distributing Safeguarded Land, [PS/E031a.5; RM3.001; RE/F010], based on the principles of the revised spatial distribution of development, focused on Macclesfield and the towns in the north of the Borough. Since Macclesfield has the highest amount of growth outside Crewe and is the only Principal Town in the Green Belt, it is sensible and reasonable that its allocation of Safeguarded Land is proportionately higher than other settlements. However, CEC agrees to slightly reduce the area of one Safeguarded Land (Site CS32) for site-specific reasons **[MM06]**. At Handforth, the apportionment of Safeguarded Land is based on its resident population, rather than on the revised spatial distribution of development [RH/B002.013]; this is more appropriate, given that the alternative would result in far more Safeguarded Land than is necessary being allocated to Handforth, particularly in view of the larger scale of development being allocated at the NCGV and the fact that Handforth may not continue to assist with meeting the needs of other Green Belt settlements into the next plan period.

102. CEC also confirms that the SADPDPD will consider the need to provide a modest amount of Safeguarded Land at the LSCs, if necessary, in line with the spatial distribution of Safeguarded Land envisaged in the supporting evidence [RE/F010; Appx 2]. Of course, identifying Safeguarded Land does not necessarily mean that it will be developed in the future, but offers the potential for development to be considered in future reviews of the CELPS without needing to alter the Green Belt. The amount and location of development that would be needed on Safeguarded Land would also be based on an assessment of needs at that time.

103. Some argue that the policy should indicate how Safeguarded Land will be brought forward for development within the current plan period. However, this approach would not reflect the purposes of identifying such land, in terms of meeting longer-term development needs beyond the current plan period, and would conflict with national policy (NPPF; ¶ 83-85). Furthermore, the CELPS has identified sufficient housing and employment land to meet the assessed requirements, so it is not necessary to identify further alternative or "reserve" sites at this stage. The monitoring framework provides a trigger for action and review if and when a shortfall in housing provision arises.

104. As regards specific sites, CEC proposes to reduce the area of Site CS32, and delete Sites CS51 & CS64 from the list of sites in Policy PG4 and on the accompanying diagram (Fig 8.3) **[MM06].** I deal with specific issues related to these and other

sites later in my report. Consequently, with the recommended modifications, I conclude that Policy PG4 provides an appropriate, justified, effective and soundly based approach to the provision of Safeguarded Land, which is consistent with national policy, is justified by the exceptional circumstances previously referred to and is necessary to ensure that Green Belt boundaries will be capable of enduring beyond the current Plan period.

Strategic Green Gaps

105. Policy PG4a is a new policy covering the proposed Strategic Green Gaps around Crewe and between Crewe and Nantwich. In my Interim Views (Appendix 1), I considered there was insufficient evidence and no exceptional circumstances to justify establishing a new Green Belt in this locality, as proposed in the CELPS-SD; CEC subsequently proposed a new Strategic Green Gaps policy covering a similar area, following advice from their consultants [BE/011; PS/E015; PS/E031a.6]. At the heart of this policy is the need to manage the rapidly changing settlement pattern in south Cheshire, particularly due to the growth of Crewe. It 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, with positive effects on sustainability objectives.

106. Some participants consider the policy is inappropriate, unjustified, ineffective and unduly restrictive, and serves no clear purpose, whilst others seek an extension to its spatial coverage or a return to the former proposed Green Belt policy. Having considered all the evidence and discussions, I consider the policy has a clear purpose, in preventing the coalescence of settlements, protecting their setting and separate identity and retaining the open land between them. The general principle of establishing Strategic Green Gaps around Crewe is wholly appropriate, reflects Policy NE4 in the existing Crewe & Nantwich Local Plan (C&NLP), is justified by specific evidence [PS/E015; PS/E031.a6] and is soundly based. Policy PG4a is necessary not only to manage the rapidly growing and changing settlement pattern in south Cheshire, enabling the growth of Crewe, but also to retain the separate identity of the surrounding towns and smaller settlements. It also takes account of local circumstances and reflects the different characteristics and roles of the various towns, settlements and local communities, in line with NPPF (¶ 10; 17; 150; 154-155; 157). I deal with issues relating to specific sites later in my report.

107. I realise that the current C&NLP policy has had mixed success at recent planning appeals, but its purposes have been recognised, even though the weight given to it has varied. Some of its policy objectives could be met by the open countryside policy (Policy PG5) (which also applies within the Strategic Green Gaps) and are similar to Green Belt policy, but it has a clear and relevant planning purpose. It is a restrictive policy and needs to be robust, covering all forms of development, in order to prevent the erosion of physical gaps between settlements and protect the visual and open character of the intervening landscape. Nevertheless, it would enable limited development which did not conflict with the purposes of this policy and those of Policy PG5. Without such a policy, development could begin to erode the gaps between existing settlements and possibly lead to their coalescence if only protected by the open countryside policy. Now that it is fully justified with proportionate and specific evidence, Policy PG4a is effective and sound.

108. The general extent of the Strategic Green Gaps policy has been addressed in the supporting evidence [BE/011], and whilst ideally its detailed boundaries should be defined in the CELPS, the revised policy provides sufficient strategic guidance and

spatial direction to determine such boundaries in the subsequent SADPDPD, when concerns about the detailed boundaries and extent of the gaps can be addressed. In the meantime, the Green Gap boundaries defined in C&NLP Policy NE4 will apply, to provide a practical interim planning solution without unnecessarily delaying the progress of the CELPS. Although the extent of the Green Gaps was originally determined over 17 years ago, it has been updated to reflect new developments (Fig 8.3a), and will be reviewed in detail in the SADPDPD.

109. Much will depend on the application of the policy, particularly in assessing the effect of development on the erosion of a physical gap between settlements, on the visual character of the landscape, and on the undeveloped character of the Green Gap, but provided that a consistent and reasoned judgement is given, the policy should effectively meet its objectives. Since sufficient land will be allocated in the CELPS to meet future development needs, the policy should be robust and defensible. However, the application of the policy needs to be clarified, particularly in terms of the effect on the undeveloped character of the Green Gap, coalescence of settlements and providing separation in broader areas of open land, and updating the general extent of the Strategic Green Gaps (Fig 8.3a), to ensure that sites subsequently developed are not included in the policy area **[MM07]**; further updates to the detailed extent of the Strategic Green Gaps may also be made in the SADPDPD. These modifications are needed to ensure that the policy is clear, effective and accurate.

110. Consequently, with the recommended modifications, the purpose and proposed approach to the designation of Strategic Green Gaps within the area to the south, east and west of Crewe is appropriate, fully justified, effective, positively prepared, soundly based and consistent with national policy.

Open Countryside

111. Policy PG5 seeks to provide for development required for local needs in the open countryside to help promote a strong rural economy, balanced with the need for sustainable patterns of development and recognising that most development will be focused on the main urban areas. The "open countryside" is defined as the area outside any settlement with a defined settlement boundary; a footnote confirms that such boundaries will be defined in the SADPDPD, but until then, settlement boundaries defined in the existing local plans will be used, as now listed in Table 8.2a. Issues about the detailed extent of specific settlement boundaries can be addressed in the SADPDPD. This is an appropriate and effective approach, given the strategic nature of the CELPS. The policy also specifies the types of development which may be appropriate in the open countryside and lists cases where exceptions may be made, reflecting Policies EG2, EG4 & SC6, without being unduly restrictive or more limiting than Green Belt policy. This approach is broadly consistent with national policy (NPPF; ¶ 28).

112. There has been much discussion about the detailed wording and application of this policy, particularly in terms of infilling and replacement buildings. Expanding the policy to allow infilling in isolated areas or outside settlement boundaries would not reflect the focus of the overall strategy or result in sustainable patterns of development, whilst the policy would enable the redevelopment of previously developed sites in the countryside, subject to specific criteria. Concerns about the scale and amount of affordable housing which may be permitted in rural areas are addressed under Policy SC6. CEC has already made several changes to the policy, including development related to heritage assets and the retention of gaps between settlements, but in response to later concerns, puts forward further

amendments to the policy wording, referring to *buildings* rather than dwellings and clarifying the definition of *infilling* and the scale of affordable housing, as well as correcting an omission in Table 8.2a **[MM08]**. These modifications are needed to ensure that the policy is clear, effective and fully consistent with national policy.

113. Consequently, with the recommended modifications, the approach to the Green Belt, Safeguarded Land, Strategic Green Gaps and the Open Countryside is appropriate, effective, positively prepared, justified, soundly based and consistent with national policy.

MATTER 3: PLANNING FOR SUSTAINABLE DEVELOPMENT

Key issue:
Does the Plan provide an appropriate, effective and soundly based framework for delivering sustainable development in Cheshire East?

114. Section 9 of the CELPS sets out the policies and principles supporting sustainable development. Policies SD1 & SD2 reflect the presumption in favour of sustainable development enshrined in national policy (NPPF; ¶ 6-8; 15) and reflected in Policy MP1 of the CELPS; they also reflect many of the core planning principles set out in the NPPF (¶ 17). They provide a comprehensive set of principles to promote and ensure development is sustainable, with viability implications having been addressed in CEC's viability work [BE/042].

115. There has been some concern about the prescriptive nature of the distance criteria set out in Table 9.1 in Policy SD2. However, a footnote already confirms that the range of facilities will depend on the location; there is no policy requirement for developments to meet all the criteria and the distances specified only apply to residential development and are recommended, rather than being mandatory.

116. Much will depend on how these policies are applied in decision-making and site selection, and not all the criteria and principles will apply to all developments. However, some amendments are needed to these policies, to update the key evidence base, clarify the application of the key principles in Policy SD2 and amend some of the distances in Table 9.1 to ensure that they align with those used in the SA and site-selection work **[MM10-11]**. These modifications will ensure that the policies provide a clear, effective and accurate framework for delivering sustainable development.

MATTER 4: INFRASTRUCTURE

Key issue:
Does the Plan provide an appropriate, effective and soundly based framework for the delivery of infrastructure, including developer contributions, which is fully justified with evidence and consistent with national policy?

117. CEC's approach to infrastructure planning began with establishing an initial baseline of existing infrastructure capacity [BE/043], and then assessed the additional infrastructure needed to enable delivery of the Plan's proposals. The results are set out in the Infrastructure Delivery Plan (IDP) [SD/012], which has now been updated (IDPU) [PC/B033]. This explains the methodology and sets out the required infrastructure projects, with details of funding, timing and delivery, in line with PPG advice [ID:12]. There is a notable funding gap for many of the projects, but this will be addressed when detailed proposals come forward, along with contributions from developers and the CIL. In the meantime, CEC is making good progress in seeking and achieving external funding for key road and other

infrastructure. Viability has also been addressed in CEC's Strategic Viability Assessment [BE/042], in line with the NPPF (¶ 173).

118. Concerns about existing traffic congestion in and around towns such as Congleton, Macclesfield, Knutsford, Poynton and Handforth, the need for new transport infrastructure and the effect of new development on transport and traffic have been addressed in the detailed traffic and transport studies, and will be assessed further when detailed proposals come forward; I deal with these concerns on a town-by-town basis later in my report. Similarly, concerns about the cross-boundary impact of traffic on the existing and future road network have been addressed in the various traffic studies and will be further examined in future work involving the SEMMMS Review, A6MARR and A34 Corridor, in liaison with neighbouring local authorities; I deal with these matters later in my report.

119. Policy IN1 provides a clear, effective and sufficient framework for providing the required infrastructure, with accompanying details of the range of infrastructure, covering physical, social, community and environmental types, recognising the implications for deliverability and viability. Transport and digital infrastructure are covered by Policies CO1-3. The IDPU sets out the infrastructure projects needed, including several major road schemes, such as the Congleton and Poynton Relief Roads and Middlewich Eastern By-Pass.

120. Policy IN2 clearly sets out the approach to developer contributions, including the types of infrastructure and the extent and nature of contributions likely to be sought, particularly for specific schemes listed in the IDPU; this covers the implications for viability and the role of CIL contributions, in line with NPPF (¶ 173/204). This provides an effective, justified, balanced and soundly based framework for developer contributions, justified with proportionate evidence and consistent with national policy.

MATTER 5: ENTERPRISE AND GROWTH

Key issue:
Does the Plan set out a clear, effective and soundly based economic strategy which positively and proactively encourages sustainable enterprise and economic growth, and are the policies for economic prosperity, rural economy, employment land, town centres and other service centres appropriate for Cheshire East, supported by a robust, credible and up-to-date evidence base and consistent with national policy?

121. Economic growth is at the heart of the strategy for Cheshire East, reflecting CEC's strategic ambitions to build on the Borough's economic assets to sustain and expand economic growth. In my Interim Views (Appendix 1), I highlighted the apparent mis-match between the proposed amounts of employment land, jobs and housing in the CELPS-SD, including the key elements outlined in the economic growth initiatives and evidence [RE/A021; BE/122; BE124; BE/128]. However, following further assessments, these shortcomings have been rectified in the CELPS-PC, as confirmed earlier in my report.

122. The key elements of the economic strategy are the vision for Crewe as a high-growth city, linked to growth nodes along the M6 corridor, and the North Cheshire Science Corridor, forming part of the North-West Science & Technology cluster; this is fully in line with the economic strategies and LEP's Strategic Economic Plan (SEP) [BE/122; BE/124; BE128]. However, the diagrams which seek to illustrate these elements of the strategy (Figs 11.1 & 11.2) seem to interpret a wider vision and spatial extent than that indicated in the High-Growth City Strategy and the LEP's

SEP. CEC agrees that they do not directly relate to any specific policy in the CELPS and could cause confusion, so they need to be deleted **[MM12]** [RH/B002.005]. Since the LEP's SEP already identifies the broad extent of the Cheshire Science Corridor (CSC) and the only Enterprise Zone (EZ) within this corridor is at Alderley Park, already identified as an Opportunity Site for science and technology, there is no need to identify the full extent of the CSC or EZ within the CELPS. The overall strategy also takes account of economic developments and initiatives outside Cheshire East, including Atlantic Gateway and Manchester Airport City. Taken together, these key elements of the CELPS economic strategy are clear, effective, positively prepared, justified and soundly based.

123. Policies EG1 & EG2 support proposals for employment development in the Principal Towns, Key & Local Service Centres and developments which support the rural economy and the vitality of rural settlements; in Policy EG2, this includes social and community facilities, such as places of worship. This approach reflects key elements of the CELPS overall strategy, as well as its economic strategy, to focus new development in the most sustainable locations, whilst recognising the need to promote economic prosperity, meet the needs of businesses and support the rural economy. It is appropriate for Cheshire East, and is justified, effective, soundly based and consistent with national policy. No further amendments are needed to these policies in terms of soundness.

124. Policy EG3 protects existing and allocated employment sites for employment uses in order to ensure an adequate and flexible supply of sites for existing, expanding and new businesses and enable the creation of new jobs and the retention of existing jobs. The overall amount of new employment land incorporates a 20% flexibility figure to ensure a sufficient amount and choice of employment land, and also addresses the needs of all business sectors, including logistics. I deal with issues about the distribution, number and location of the proposed employment sites later in my report. The policy does not seek to protect all employment land, but sets out the circumstances where alternative development may be permitted. These tests are not unduly onerous and reflect the approach in NPPF (¶ 22). The on-going monitoring of employment land and uses set out in the monitoring framework will help to ensure that sufficient employment land is being delivered, while addressing any losses. Apart from referring to the latest Development Framework for Alderley Park **[MM13]**, no further changes to this policy are needed in terms of soundness.

125. Tourism is an important and growing element of Cheshire East's economy [BE/130]. Policy EG4 sets out criteria for protecting and enhancing the Borough's tourist assets and for supporting new tourist development, not only in the main towns, but also in the rural areas. In line with the overall strategy, it applies a more stringent approach to the rural areas, recognising the need to safeguard the countryside and landscape, whilst supporting the rural economy and ensuring that the scale, design and location of new tourist facilities and accommodation are appropriate. This is an effective, justified and soundly based approach which is consistent with national policy.

126. The key element of the strategy for town centres, retailing and commerce is CEC's "town centre first" approach. Policy EG5 establishes the hierarchy of retail centres and seeks to maintain the roles, function, viability and vitality of the main towns in Cheshire East through the policy for town centres. It is supported by the settlement hierarchy and other retail evidence [BE/046; BE/009-010]. It also sets out a sequential approach to edge/out-of-centre retail proposals, with thresholds in line with the approach in NPPF (¶ 24/28). CEC proposes to confirm that this

approach will not apply to small-scale rural offices or other small-scale rural development, and that proposals for leisure facilities are also referred to in Policy SC1 **[MM14]**; these amendments are needed to ensure that the policy is clear, effective and fully consistent with national policy (NPPF; ¶ 25).

127. However, Policy EG5 does not indicate the future capacity for additional town centre and retail development in the main towns and service centres, or establish the boundaries of town centres and primary shopping areas. These issues are discussed in the retail study [BE/010], but CEC has made no attempt to determine future retail capacity, either in overall terms or for the main towns, since the retail study needed to be updated with more accurate information at the time of preparing the CELPS-SD & CELPS-PC; major regeneration schemes have also been approved for Crewe and Macclesfield [PS/D003.017]. This could be seen as a serious omission in the CELPS-SD & CELPS-PC, but rather than delay the Plan, it can be addressed in the subsequent SADPDPD, in the light of updated evidence; this will include the allocation of additional sites for town centre and retail development, if needed and justified. Similarly, given the strategic nature of the CELPS, the SADPDPD is an appropriate document in which to establish detailed boundaries for the town centres and primary shopping areas, including proposals for enhancing the primary shopping areas; in the meantime, the boundaries defined in the "saved" local plans will apply.

128. Consequently, with the recommended modifications **[MM12-14]**, the Plan sets out a clear, effective and soundly based economic strategy, which positively and proactively encourages sustainable enterprise and economic growth, supported by a robust, credible and up-to-date evidence base and in line with national policy.

MATTER 6: STRONGER COMMUNITIES

Key issue:
Does the Plan provide an appropriate, effective and soundly based framework for supporting stronger communities, including the provision of leisure, sports and recreation facilities, ensuring their health and well-being, providing a mix of dwellings, including affordable and rural exceptions housing, and provision for gypsies and travellers, which is fully justified with evidence and consistent with national policy?

129. Section 12 of the CELPS includes policies which promote stronger communities, covering leisure and recreation, health and well-being, housing mix, including affordable homes and rural housing, and gypsies and travellers accommodation.

130. Policies SC1 & SC2 set out how leisure and recreation facilities, including sports facilities, will be provided for local communities. They provide a sufficient and effective framework for providing additional facilities, with an approach agreed with Sport England. Some evidence is available for indoor sports facilities and open/green space [BE/044; BE/018; BE015], but further work is needed on the Playing Pitch Strategy, which will inform the SADPDPD. However, the policies and text need to be amended to address Sport England's detailed concerns, and to clarify and update the approach to leisure and recreation, including indoor and outdoor sports facilities **[MM15-16]**. With these recommended modifications, the policies would be clear, up-to-date and effective.

131. Policy SC3 seeks to create and safeguard opportunities for safe, healthy, fulfilling and active lifestyles, including the expectations for new developments. This approach has been developed in consultation with key service providers, is supported by evidence [BE/137] and reflects national policy in NPPF (Section 8 &

¶ 17) and PPG [ID-53]. The requirement for Health Impact Assessments reflects health and social care legislation, and the relevant checklist will be finalised when CEC's Health Impact Assessment Policy is adopted. The policy is clear, effective and justified and needs no further amendments in terms of soundness.

132. Policy SC4 seeks to provide a mix of housing types, sizes and tenures in new residential developments so as to create mixed neighbourhoods, in line with NPPF (¶ 50) & PPG [ID-2a/50]. This approach is supported by the SHMA and CEC's Housing Strategy and Vulnerable/Older Persons Housing Strategy. The policy covers all types of housing developments and the housing needs of different groups in the community, including self-build and specialist accommodation for older people, in line with NPPF (¶ 50/159). Following the deletion of specific housing standards, it retains sufficient flexibility to accommodate the recent changes arising from the national Housing Standards Review[2]. Issues about viability have been generally addressed in CEC's Viability Study [BE/042] and will be considered further when detailed schemes come forward. Apart from referring to the legitimate role of Neighbourhood Plans in securing an appropriate housing mix **[MM17]**, for clarity and effectiveness, no further amendments are needed.

133. Policy SC5 addresses the relatively high need for affordable housing in Cheshire East, setting out the requirements and thresholds for new residential schemes. It is supported by evidence in the SHMA & HDS [BE/001-003; PS/E033] which identifies the amount and type of affordable housing needed (355 dw/yr) and justifies the site size thresholds and 30% level of provision; it also reflects discussions with Registered Providers and other affordable housing programmes. CEC has addressed issues of viability and delivery [BE/003; BE/042], and recognises that the 30% target may not be deliverable in lower-value areas and on brownfield sites. However, the policy includes sufficient flexibility to enable developers to negotiate a lower proportion of affordable housing on specific sites if this is supported by viability evidence, without being unduly onerous, in line with NPPF (¶ 173-177). The provision of affordable housing as a proportion of market housing schemes is not the only source of supply; other mechanisms include specific provision by Registered Providers and other bodies, often at 100% level, as well as bringing empty and unfit homes into use [PS/D003.018-a].

134. References to specific design and quality standards have been deleted from the policy, reflecting changes in national policy, and it retains flexibility to respond to any future changes in national policy on housing standards. However, CEC proposes to amend the affordable housing thresholds for smaller developments in LSCs to 11+ dwellings/1000 sq m, in line with the PPG [ID:23b-031] and 2014 Ministerial Statement, and confirm that the policy will not apply to extensions or annexes to existing homes **[MM18]**. These modifications are needed to ensure the policy is effective, deliverable and consistent with the latest national policy.

135. Policy SC6 addresses rural exceptions housing for local needs, including specific criteria for considering suitable schemes. The general approach reflects the fact that such schemes are exceptions to the normal policy of development restraint in rural areas, and will help to meet local needs and support rural communities. The policy requires such proposals to be justified in terms of an identified need by a Rural Housing Needs Survey, which is not unreasonable or unduly onerous, and sets out the approach to cross-subsidy. The requirements for schemes to be appropriate in scale, design and character take account of local circumstances and legitimate local needs without being unduly restrictive. Consequently, the general

[2] Planning Update March 2015 – Written Ministerial Statement [DCLG; March 2015] & PPG [ID:56]

approach is appropriate, justified, effective and soundly based, accords with national policy in NPPF (¶ 54/89 and glossary) and PPG [ID-50], and needs no further amendment.

136. CEC is fully committed to meeting the accommodation needs of gypsies, travellers and travelling showpeople, and Policy SC7 provides the strategic framework for making such provision. The level of need for such accommodation is based on the most recent 2014 GTAA [BE/007], which covers Cheshire West & Chester, Halton and Warrington Councils, and which was found to be robust and sound at the Cheshire West & Chester Local Plan examination; a MOU has been agreed with SMBC relating possible cross-boundary provision, and both Derbyshire and East Staffordshire Councils are aware of the position [SD/013]. CEC is making good progress in identifying potential sites [BE/008], which will be designated in the SADPDPD. This general approach, including specifying the number of additional pitches needed and the site-selection criteria, reflects national policy in NPPF (¶ 50/159) & PPTS (¶ 8-13).

137. In response to concerns that the GTAA may have over-estimated the accommodation needs of travelling showpeople, especially in terms of migration, CEC has confirmed that its consultants assessed such needs in a consistent and comprehensive manner, using proportionate and available information, after consulting with the Showmen's Guild [PS/D003.019; PS/E021; RH/B002.038]. I recognise that such needs are sometimes difficult to assess, with little firm evidence, and also that national policy on traveller sites was updated in August 2015, along with amendments to the Housing Act 2004. However, national policy confirms that the needs of travelling showpeople should be considered; such needs should also be considered at the planning application stage, as occurred in the more recent appeal case cited [RH/D019]. Having considered all the detailed points raised, I conclude that the current evidence base provides a robust, positively prepared, proportionate and soundly-based approach to assessing GTAA needs, which is consistent with national policy, and no further amendments are needed to Policy SC7 or the accompanying text.

138. Consequently, with the recommended modifications **[MM15-18]**, the Plan provides an appropriate, effective and soundly based framework for supporting stronger communities, which is fully justified with evidence and consistent with national policy.

MATTER 7: SUSTAINABLE ENVIRONMENT

Key issue:

Does the Plan provide an appropriate, effective and soundly based framework for protecting, maintaining and enhancing the high quality environment within Cheshire East, including design and efficient use of land, biodiversity and geodiversity, the landscape, green infrastructure and historic environment, renewable energy and energy efficient development, sustainable minerals provision and waste management, which is fully justified with evidence, positively prepared and consistent with national policy?

139. Section 13 of the CELPS sets out policies to protect, maintain and enhance the natural and historic environment of Cheshire East and make sustainable use of resources. Many of the policies in the CELPS-SD have already been amended in the CELPS-PC through **PMM01**, to address relevant concerns and are now soundly based and consistent with national policy.

140. Policy SE1 covers the design of new developments, including provisions for inclusive design and accessible environments, in line with NPPF (¶ 57-58; 61/69). However, some further amendments are needed to delete references to internal/ external space standards following the Government's review of housing standards; CEC also wishes to refer to the advisory standards in Sport England's "Active Design" principles **[MM19]**. These modifications are needed to ensure that the policy is justified and effective, with sufficient flexibility to address any further changes in national policy. Policy SE2 sets out a positive approach to the efficient use of land, which is consistent with national policy and needs no amendment.

141. Policy SE3 seeks to protect and enhance areas of biodiversity and geodiversity value, including both European and locally designated sites. However, it is necessary to redraft parts of this policy to ensure that it properly reflects the approach in national policy to developments which may affect European sites and national priority species and habitats; CEC also proposes to refer to the role of Neighbourhood Plans and update the key evidence base **[MM20]**. The terms of the revised policy do not go beyond national policy in the NPPF or the specific and complementary legal requirements. When read as a whole, the policy would help to achieve enhancements in biodiversity, focusing on the need to ensure that there is no net loss in biodiversity after mitigation. There is no need to repeat national policy or guidance when considering the designation of Local Green Spaces in neighbourhood plans. With these modifications, the policy would be justified, effective, soundly based and consistent with national policy (NPPF; Section 11).

142. Policy SE4 sets out an appropriate approach to protecting the landscape, which is supported by evidence and is consistent with national policy. Policies SE5 & SE6 set out an appropriate approach to trees, hedgerows, woodland and green infrastructure. However, some further amendments are needed to clarify the approach in Policy SE5 to developments affecting trees, hedgerows and woodland, and add reference to the Gritstone Trail and clarify the role of the Sports Strategy and Neighbourhood Plans in Policy SE6 **[MM21-22]**. Issues relating to Local Green Spaces are for neighbourhood plans, rather than the CELPS; although evidence supporting emerging neighbourhood plans may be relevant, such plans only have full weight when they have been "made". With these modifications, these policies would be justified, effective, soundly based and in line with national policy. I deal with site-specific issues later in my report. Policy SE7 deals with the historic environment, is supported by evidence and is in line with national policy.

143. Policies SE8 & SE9 set out the approach to renewable and low-carbon energy and energy efficient development. In general terms, these policies reflect national policy (NPPF; Section 10 & PPG: ID-5), are supported by specific evidence [BE/014; BE/020-022], and cover the wider environmental, economic and social benefits, as well as feasibility, viability and impact of such developments. The 10% target for renewable/decentralised/low-carbon energy is derived from the evidence base [BE/021], and further details of specific sites and developments, including wind turbines, will be considered in the SADPDPD. However, Policy SE8 needs some amendments to proposals for wind energy development, to reflect the 2015 Ministerial Statement and updated PPG [ID:5-033] **[MM23]**. CEC has already amended Policy SE9 to delete reference to earlier housing standards, but a further change is needed to update the reference to supporting evidence **[MM24]**. With these modifications, the policies would be appropriate, effective, deliverable, justified with evidence and consistent with the latest national policy, as well as having sufficient flexibility to accommodate any future changes in national policy.

144. The policies for Minerals and Waste provide the strategic framework and context for the subsequent SADPDPD and Minerals & Waste DPD (M&WDPD). Policy SE10 sets out the strategic priorities for the sustainable provision of minerals, confirming that such provision will be based on sub-regional apportionments and Local Aggregate Assessments, and including a commitment to maintaining landbanks for sand and gravel, crushed rock and silica sand; the proposed provision levels of sand and gravel and crushed rock are shown in the accompanying text. It is supported by evidence [BE/027-029], and more detailed policies covering development management (including hydrocarbons and oil and gas development), and area/site designations (such as Mineral Safeguarding Areas (MSA) and specialist minerals such as silica sand) will be included in the SADPDPD; until then, saved policies in the Cheshire Replacement Minerals Plan will apply.

145. Work is well advanced on identifying potential mineral sites, and the broad extent of mineral resources is shown in Fig 13.4, to inform the extent of MSAs. CEC has already amended the supporting text to clarify the approach to prior extraction of minerals, and cross-boundary minerals issues have been the subject of continuing dialogue with neighbouring Mineral Planning Authorities and the North-West Aggregates Working Party. This approach is broadly consistent with national policy (NPPF: ¶ 142-146; PPG: ID-27) and provides a sound, flexible, positively prepared and effective framework for the sustainable provision of minerals in the subsequent SADPDPD.

146. Policy SE11 sets out the strategic priorities and principles for the sustainable management of waste, which will be dealt with in more detail in the subsequent M&WDPD. It confirms that waste management developments will be expected to accord with the principles of the waste management hierarchy, including prioritising waste as a resource to be re-used, and that appropriate locations for waste management facilities will be identified in the M&WDPD; until then, saved policies of the Cheshire Replacement Waste Local Plan will apply. It is unfortunate that neither the policy nor the accompanying text gives any indication of the amount of waste generated and requiring management or the extent of the waste management capacity "gap". However, the evidence base includes an updated waste needs assessment for Cheshire East (2014), which provides this information, and will inform the M&WDPD. The policy reflects the Cheshire Joint Municipal Waste Management Strategy (MWMS) [BE/131], and an updated MWMS for Cheshire East has now been prepared; however, the key evidence base needs to be updated to reflect this latest evidence **[MM25]**.

147. The policy also commits CEC to plan positively to meet Cheshire East's waste management needs, recognising the strategic nature of waste management and the reality of cross-boundary movements of waste, which have been subject to a continuing dialogue with neighbouring Waste Planning Authorities and the North-West Regional Technical Advisory Body for Waste. On this basis, the approach is broadly consistent with national policy (NPPW; PPG: ID-28) and provides sufficient strategic guidance and spatial direction for the sustainable management of waste and the provision of waste management facilities which will be addressed in more detail in the subsequent M&WDPD.

148. Policies SE12 & SE13 cover pollution, land contamination, instability and flood risk. They are supported by specific evidence and have been prepared in liaison with the relevant regulatory bodies, including the Environment Agency, Natural England and other specialist bodies. CEC has already amended these policies to address relevant issues and further detailed work will be prepared to inform the SADPDPD. Subject to consistent application, particularly in terms of the sequential flood risk

test, they are appropriate, justified, effective, soundly based and consistent with national policy, and need no further amendment.

149. Policy SE14 aims to ensure that no development within the Jodrell Bank Consultation Zone impairs the efficiency of the Radio Telescope. A similar policy is included in the Congleton Borough Local Plan, and was considered at a recent planning appeal; this confirmed that Jodrell Bank Observatory should be afforded reasonable protection and that harm to the efficiency of the radio telescope carries substantial weight in decisions on new developments [RH/D005]. CEC intends to prepare more detailed policy and guidance for development affecting Jodrell Bank in the SADPDPD. Policy SE15 seeks to resist development which would affect the setting of the Peak District National Park Fringe or compromise the purposes of its designation; the extent of the Peak Park fringe is now shown in Fig 13.5. Both policies have been positively prepared in liaison with the relevant bodies (including University of Manchester and the Peak District NPA), and have already been amended to address relevant concerns. As now amended, they are appropriate, justified, effective, soundly based and consistent with national policy.

150. Consequently, with the recommended modifications **[MM19-25]**, the Plan provides an appropriate, effective and soundly based framework for protecting, maintaining and enhancing the high quality natural and historic environment within Cheshire East, and for sustainable minerals and waste management, which is justified with evidence, positively prepared and consistent with national policy.

MATTER 8: CONNECTIVITY

Key issue:
Does the Plan provide a clear, effective and soundly based strategy to promote sustainable transportation, manage the demand for travel and provide transport infrastructure, which is justified, positively prepared, appropriate for Cheshire East and consistent with national policy?

151. Section 14 of the CELPS sets out policies to promote connectivity, sustainable travel and transport, infrastructure, digital connections and travel plans.

152. Policy CO1 provides a clear strategy for promoting sustainable travel and transport and managing the demand for travel, focusing on reducing reliance on the private car by providing improved services and facilities in key sustainable locations and promoting the use of public transport, walking and cycling. This approach is consistent with the Local Transport Plan (LTP) [BE/033] and with national policy (NPPF; Section 4), and is supported by the settlement hierarchy and the approach to site-selection. CEC proposes to clarify the approach to supporting priority for cyclists, deleting the phrase *"wherever possible"* **[MM26]**. This would ensure that the policy is effective, justified, positively prepared and soundly based. There is no need to refer to other cycling strategies and design guides in this strategic-level CELPS, particularly since their status changes over time.

153. Policy CO2 aims to enable business growth through transport infrastructure, supporting well-connected and accessible developments. This approach is consistent with the LTP and with national policy in NPPF (Section 4) & PPG [ID-018]. Work is progressing well on implementing the major new highway schemes listed in the IDPU, which are justified, viable and deliverable, and are needed to facilitate the release of land for development. CEC has already undertaken a substantial amount of work on traffic modelling and traffic studies to assess the implications of major development proposals, such as NCGV, including identifying the required mitigation and road improvements needed.

154. CEC has already made some amendments to Policy CO2 and now intends to update and clarify its application, to refer to the HS2 Safeguarding Directions, the possible need to provide information and contributions to cross-boundary transport strategies, where appropriate, and confirm its commitment to working with adjacent local authorities to mitigate the impact of cross-boundary travel, including a refresh of the SEMMMS study [PC/B036] **[MM27]**. These amendments are needed to ensure that the implications of HS2 and proposed developments in Cheshire East on cross-boundary transport, including commuting, are addressed at the appropriate time, in line with the latest Memoranda of Understanding with SMBC and Staffordshire CC [RE/F021; RE/F013], and ensure that the policy is effective and positively prepared. I deal with site-specific issues relating to the impact of HS2 and the Safeguarding Directions later in my report.

155. Policies CO3 & CO4 address the need for digital connections, travel plans and transport assessments. They reflect key elements of national policy (NPPF; ¶ 29-36; 42-44; 173) and recognise the need for good telecommunications and digital connections, as well as the need for transport assessments and travel plans to take account of the transport and traffic implications of new developments, in line with the PPG [ID-42]. They have been drawn up in liaison with the relevant bodies and providers, after considering the implications for viability, and are not unduly onerous for developers. As drafted, they are justified, effective and soundly based and need no further amendments.

156. With these recommended modifications **[MM26-27]**, the Plan provides a clear, effective and soundly-based strategy to promote sustainable transportation, manage the demand for travel and provide the necessary transport infrastructure, which is justified, positively prepared, appropriate for Cheshire East and consistent with national policy.

MATTER 9: MONITORING & IMPLEMENTATION

Key issue:
Are the arrangements for monitoring the policies of the Plan adequate, effective, comprehensive and soundly based?

157. Section 16 of the CELPS sets out the approach to monitoring the Plan's policies and implementing its provisions and proposals. CEC has made some revisions to the Monitoring & Implementation Framework (Table 16.1), and following the latest hearings, has put forward some further amendments, including a new indicator for jobs growth and to ensure a consistent approach to reviewing the relevant policies **[MM86]**. These amendments are needed to ensure the effectiveness of the policies and their monitoring.

158. The CELPS also includes several Annexes, setting out details of the Proposed Growth Distribution, Saved Policies, Parking Standards, Evidence Base and the Housing Trajectory. CEC proposes to amend and update these annexes to reflect changes made to the policies in the CELPS-PC and updates to housing land supply and delivery **[MM87-88]**. These amendments would also clarify the contribution of windfall sites and the approach to meeting housing land supply requirements in terms of the "Sedgepool 8" approach, and are needed to ensure that the Plan is consistent, up-to-date and effective.

MATTER 10: LOCAL PLAN STRATEGY SITES AND STRATEGIC LOCATIONS

Key issue:
Is the development strategy, proposed amount of housing and employment land, and the proposed strategic sites and strategic locations for each of the settlements appropriate, justified, sustainable, effective, deliverable, viable and soundly based?

159. Section 15 of the Plan sets out the strategic sites and strategic locations proposed for each of the main towns. I have dealt with the settlement hierarchy and the spatial distribution of development earlier in my report, under Policies PG2 & PG6. In this part of my report, I focus on specific issues raised about the development strategy for each of the Principal Towns and Key Service Centres, along with the proposed strategic site allocations and strategic locations.

General

160. The CELPS identifies over 60 strategic sites and strategic locations in and around the main towns of the Borough, informed by the settlement hierarchy and spatial distribution of development set out in Policies PG2 & PG6. The CELPS-PC has increased the overall amount and housing and employment development, resulting in additional strategic sites being identified, particularly in the towns in the north of the Borough. The main general issues relate to the site-selection process, the approach to releasing Green Belt sites, the amount of development at each of the main towns, the likely capacity of sites within the urban areas to contribute to development requirements, and the capacity of local infrastructure, services and facilities to accommodate the proposed scale of development at each of the towns.

161. CEC has selected the proposed site allocations using the specified methodology, in a comprehensive, consistent, objective and transparent way, assessing all reasonable alternatives, including those promoted by others, and giving reasons for selecting or rejecting the various sites, without being contrived or retro-fitting the evidence [RE/F010; PC/B007-021]. As I said in my Further Interim Views (Appendix 2), this approach provides an appropriate, effective, comprehensive and soundly based framework for selecting the strategic sites, based on available and proportionate evidence, in line with the guidance in the NPPF and PPG [ID-3]. Some participants question some of the individual site assessments, but CEC has reviewed the assessments and in some cases amended some of the detailed assessments. Most of the alternative/additional sites are greenfield sites, many of which are in the Green Belt, but apart from deleting Site CS64 and amending Site CS51, CEC has made no changes to the proposed site allocations. Having considered all the evidence and discussions, I can see no fundamental flaws in the approach taken or in the final site assessments. However, Neighbourhood Plans need to be added to the evidence supporting the site-selection process **[MM28]**.

162. CEC has also confirmed the definition of a "Local Plan Strategy Site" and "Strategic Location" [SD/015; PS/B006b]. Some developers and landowners are concerned about the threshold set for selecting strategic site allocations (150 dw/5ha). However, the CELPS is a strategic document, and contains site allocations that are considered to be "strategic" in nature, with a threshold similar to that used by the Secretary of State in his recovery powers for planning applications and appeals. In my Further Interim Views, I have already confirmed that this is a reasonable site size threshold in the context of Cheshire East. Developers and landowners will have the opportunity to put forward smaller "non-strategic" sites when the SADPDPD is prepared. Proposed site allocations account for over 50% of overall housing provision, but along with existing completions and commitments, the

CELPS-PC provides for over 90% of the currently identified development requirements up to 2030. This leaves a balance of some 3,300 dw and 15ha of employment land to be identified in subsequent plans, including the SADPDPD and Neighbourhood Plans, providing sufficient flexibility and choice.

163. This approach ensures that sufficient specific deliverable sites for more than 5-years housing supply (with an additional buffer of 20%) are identified, along with further specific, developable sites or strategic locations for later years of the plan period, fully meeting the requirements of NPPF (¶ 47). Further flexibility is provided in both the overall level of provision proposed (+6.5% for housing and +20% for employment land) and for each of the main towns and settlements. Taken overall, I consider the CELPS-PC allocates sufficient strategic sites and locations to ensure that the proposed amount of new housing and employment land will be delivered effectively, with sufficient flexibility and scope for further smaller-scale allocations in the SADPDPD and Neighbourhood Plans.

164. CEC has assessed all potential Green Belt sites around Macclesfield and the towns in the north of the Borough [PS/E034]. In my Further Interim Views, I confirmed that this has been undertaken in a consistent, objective, comprehensive and transparent way, assessing the contribution that each site makes to the purposes of the Green Belt and the implications for the wider Green Belt, and the results have informed the final site-selection process. For each of the towns surrounded by the Green Belt, CEC has assessed whether development needs can be met, firstly by examining the likely contribution from sites within the urban areas and other non-Green Belt land, and then by assessing potential Green Belt sites in a sequential manner, depending on their contribution to Green Belt purposes, ranging from "no contribution" through to a "significant" and "major" contribution. Having considered all the evidence, I can find no fundamental flaws or errors in the approach or in the final assessments, particularly since it relies on matters of reasoned judgement.

165. There is considerable local concern about the loss of Green Belt, not only for development, but also for Safeguarded Land, particularly since several of the identified sites make a significant or, in a few cases, a major contribution to Green Belt purposes. National policy confirms that Green Belt land should only be released in exceptional circumstances; on its own, unmet housing need does not necessarily justify the use of Green Belt land. For Cheshire East, CEC has demonstrated the exceptional circumstances to justify using Green Belt, not only in overall terms [PS/E034], but also the inability of Macclesfield and the northern towns to meet their housing and employment needs without going into the Green Belt. This is due to the lack of other suitable alternatives, including existing urban and non-Green Belt sites, most of which have other development constraints; failure to meet these needs would result in unsustainable development and would not fully meet the identified overall need for new housing and employment land. In total, the loss of sites in the Green Belt in the CELPS-PC amounts to some 1.55% of the existing Green Belt in Cheshire East.

166. CEC has examined all other reasonable options for meeting the identified need for new housing and employment land, assessing the amount of development likely to come forward from brownfield and other sites within the existing urban areas, and considering other options for alternative spatial distributions of development. I deal with specific points about particular Green Belt sites later in this section of my report. There is also some local concern about the proposed amount of Safeguarded Land being identified, but this generally reflects the recommended apportionment for each town set out in the submitted evidence [PS/E031a.5; RE/F010-

Appx 2]. CEC has also considered various options for distributing Safeguarded Land across the Borough, including redistributing some of the apportionment to Handforth [RH/B002.013]; detailed issues will be addressed further when considering the specific sites identified.

167. Several local organisations and residents consider that CEC has under-estimated the amount of development that is likely to come forward within the existing urban areas. However, CEC has undertaken a comprehensive assessment of the likely potential of development on brownfield/windfall sites within the urban area in its Urban Potential Study (UPS) [PS/E039]. This uses evidence of past completions and commitments and the likely availability of such sites coming forward [PC/B037]; it also sets out the methodology and reasons for selecting and omitting specific types of brownfield sites. CEC confirms that all housing and employment commitments, including windfalls and completions, have been and will be taken into account in the housing supply figures. CEC also agrees to amend the overall housing supply figures to take account of small windfall sites coming forward across the Borough, rather than just in Crewe and Macclesfield. Further smaller sites will be identified for development in the subsequent SADPDPD and Neighbourhood Plans. Consequently, in undertaking the site-selection process, I consider that CEC has taken sufficient account of all relevant potential sources of housing and employment land supply, including existing brownfield and windfall sites in the urban areas, before considering allocating greenfield and Green Belt sites.

168. CEC has also addressed issues relating to the capacity of local infrastructure, facilities and services to accommodate the proposed amount of development, through discussions with service providers, including schools and health facilities; new facilities and infrastructure are identified in the IDPU [PC/B033], and contributions will be expected from many developments to provide new facilities and services. However, it is necessary to adopt a consistent approach to specifying the amount of development at each of the strategic sites, generally adopting the phrase *"around"*, to provide flexibility (this is covered in the specific sites). Some participants are concerned about the nature, design, density, type, layout and size of dwellings envisaged, and the access arrangements, but these are detailed matters which would be more appropriately addressed in CEC's consideration of subsequent planning applications.

169. Consequently, I consider the overall approach to the development strategy for each of the main towns, the amount of proposed housing and employment development and the site-selection process, including the approach to releasing Green Belt sites, is appropriate, justified with proportionate evidence, effective, soundly based and consistent with national policy.

Crewe

170. Crewe is the Borough's largest Principal Town, located at a strategic gateway to the North-West region, with excellent communication links by road and rail. The development strategy for the town stems from the earlier Town Strategy and other regeneration and growth initiatives, including the Northern Gateway/All Change for Crewe: High Growth City strategies, and focuses on high-quality employment-led growth. Since Crewe is at the top of the settlement hierarchy, there is little dispute that it should accommodate the most new development, particularly given its sustainable location, good transport links and the wide range of economic and regeneration initiatives, employment opportunities and associated need for more housing. The CELPS-PC allocates 7,700 new homes and 65ha of new employment land to Crewe.

171. CEC has undertaken various studies to examine the potential impact of the revised scale of proposed development at Crewe on the existing and future infrastructure, including the road network [BE/036-037; PC/B023; PC/B038]; highway schemes are listed in the IDPU, with details of funding and timing. Development trajectories for the housing sites are realistic and have been drawn up using information from prospective developers, where available, and there seem to be no unresolvable issues in terms of viability or delivery. Given the variety of locations, timing and types of developments and the number of developers involved, there should be no issues of "market saturation". The total level of housing provision for Crewe includes a 8.4% flexibility factor, with sufficient strategic sites being identified to meet almost all the proposed allocation. The main outstanding issues relate to the location and deliverability of the specific site allocations and the impact of HS2.

172. On the latter issue, CEC has repeatedly stated that the CELPS is effectively a pre-HS2 plan, which will be subject to review when the full details and impact of HS2 are known [RE/A021]. It would not be in the best interests of efficient and timely planning to further delay the adoption of the CELPS to await the further details of HS2, particularly since most of its economic benefits and growth implications are expected to come forward in the latter part of the current plan period (post-2027). However, CEC has decided to make specific reference to the emerging proposals for HS2, including the Safeguarding Directions issued in 2014 & 2016, in the accompanying text and diagrams **[MM29]**. This would ensure that the CELPS is justified, effective, deliverable and up-to-date, and in line with national policy.

173. As for the specific site allocations, CEC has taken a realistic approach to the amount of development that could be expected from *Central Crewe* and its urban area (SL1; 400 dw). This is supported by specific evidence of past completions and the UPS [PS/E039], with no double-counting of commitments or windfalls, as confirmed in a footnote to Appendix A. Development and regeneration sites are coming forward and there is a reasonable prospect of the proposed amount of development being delivered. CEC has fully justified this proposal and addressed issues relating to the site-specific principles of development. Concerns about the precise boundary of the Strategic Employment Area at the Bentley Motors site would be addressed in the subsequent SADPDPD, as part of the Bentley Masterplan. No amendments to this proposal are therefore needed.

174. *Basford East* & *Basford West* (CS1/CS2) are long-standing allocations for mixed development, including homes, employment and associated uses, most of which have planning permission and are now underway. CEC has addressed relevant site-specific issues, including the amount, mix and location of development, impact on heritage/conservation assets, the potential impact on nearby SAC/RAMSAR/ SSSI sites, pedestrian/cycle links, infrastructure, community services and contributions to road improvements. Basford West is currently affected by the HS2 Safeguarding Direction, which may delay or reduce the amount of development proposed (about 13ha of the employment site and a small part of the housing site could be affected). However, any losses would be covered by the flexibility provided in the overall provision of housing and employment land, and further sites could be considered in the SADPDPD. CEC is currently in discussions about amending the area affected by the Safeguarding Direction following the probable relocation of the HS2 Maintenance Depot. CEC suggests some additional text, which would cover the interim situation and reflect the latest position on HS2, as well as updating the latest planning status of the site **[MM30]**. These amendments are necessary to ensure that the proposals are justified, effective, deliverable and up-to-date, and consistent with national policy.

175. *Leighton West & Leighton* (CS3/CS38) are major housing-led developments, creating a sustainable urban extension on land around Leighton Hospital. CEC has addressed relevant site-specific issues, including the amount, extent, mix and location of proposed development, greenspace, ecological and highway capacity issues, required road improvements and the provision of retail, education, leisure and other facilities, along with the implications for Leighton Hospital. Developers are committed to the development, with planning applications approved in principle or under preparation, realistic rates of delivery and no viability issues. CEC puts forward some limited changes to the policies and associated text to clarify and update the approach to development and infrastructure relating to these sites, including consistency with recent planning permissions, highways, access, funding and developer contributions; a minor amendment to the northern boundary of Site CS3 is also proposed (Fig 15.5) to reflect the most appropriate extent of the site. These modifications **[MM31-32]** are needed to ensure that the proposals are effective, fully justified and soundly based.

176. Proposals for new housing at *Crewe Green* and *Sydney Road* (CS4/CS5) are supported by developers and are soundly based. CEC has addressed relevant site-specific issues, including the impact on conservation, heritage, ecological and biodiversity assets and on the Strategic Green Gap, as well as the delivery of highway improvements, including the Crewe Green roundabout and Sydney Road railway bridge. The Sydney Road site has been significantly enlarged from that proposed in the CELPS-SD, increasing the capacity from 250-525 dwellings, to reflect current planning permissions. Design options for the Crewe Green roundabout are progressing and details of funding, timing and delivery for both this scheme and the Sydney Road bridge are included in the IDPU. Apart from clarifying the capacity of Site CS5 and updating the funding arrangements for delivering the Crewe Green roundabout by the end of 2018 **[MM33-34]**, no further amendments are needed to these proposals.

177. *South Cheshire Growth Village* (SCGV) (CS37) is a more controversial proposal, located on a greenfield site south of Crewe Hall & Park. It offers the opportunity to create a sustainable, distinctive, high quality residential community close to Crewe Hall Business Park and the proposed development at Basford East. During the site-selection process, CEC has addressed key issues such as the impact of the development on the setting of designated heritage assets and the surrounding landscape, and the prospective developer is actively progressing the proposal, confirming deliverability and viability. Other site-specific issues have been addressed, including the amount of housing development (now reduced to 650 dwellings in response to HE concerns), range of uses and the extent of the site, along with the delivery of education, green infrastructure, pedestrian/cycle links to Basford East and the town centre, other facilities and road improvements. The designation of Protected Open Space, with structural landscaping, on the eastern fringe of the site would also help to safeguard the adjoining Green Belt and Strategic Green Gap from further encroachment. I am satisfied that there are no fundamental flaws in the SA & HRA in terms of the site-selection process, particularly in considering SCGV against other alternative sites, such as Gorsty Hill. Apart from clarifying the type of community uses proposed, to ensure the proposal is effective **[MM35]**, no further amendments are needed to this proposal.

178. Developments at *Shavington/Wybunbury Triangle & East Shavington* (CS6/CS7) are well advanced, with planning permission and houses under construction. CEC has addressed relevant site-specific issues, including the amount of development and consistency with recent planning permissions, local concerns about density

and type of housing, the impact on nearby SAC/RAMSAR/SSSI sites and the Strategic Green Gap, along with infrastructure, environmental and wildlife concerns, highways and flooding/drainage issues. Some representors argue that these developments should be included in the overall figures for the rural area, since they lie some 4km from Crewe. However, irrespective of parish boundaries, there is a close functional relationship between Shavington and Crewe, and the sites are not far from major new developments at Basford & SCGV. Including these sites within the figures for Crewe represents a consistent approach applied across the Plan area and would help to meet the housing needs of Crewe as well as these villages. Apart from clarifying the scale of development at Site CS6, for effectiveness **[MM36]**, no further amendments are needed to these proposals.

179. Planning permission has now been granted for the proposed housing at *Broughton Road* (CS39), and there are no representations objecting to this proposal. CEC has addressed site-specific issues, including the potential impact on ecological assets and the delivery of green infrastructure and highway improvements. No further changes are needed to this proposal in the interests of soundness.

180. Consequently, with the recommended modifications **[MM29-36]**, the development strategy and proposed site allocations for Crewe are appropriate, justified, effective, deliverable, sustainable, viable and soundly-based.

Macclesfield

181. Macclesfield is Cheshire East's second largest town, comprising an historic and sustainable market town with a wide range of facilities and services. Although tightly bounded by the Green Belt and close to the edge of the Peak District National Park, there can be little dispute that, as a Principal Town, it should accommodate a significant amount of development to sustain its economic role. The development strategy has evolved from the earlier Town Strategy, including the long-standing allocation at the South Macclesfield Development Area, and aims to provide a comprehensive and effective approach to realise the town's potential for growth, supporting regeneration and providing new employment land, housing and other uses.

182. However, since all growth cannot be accommodated within the existing urban area, some intrusion into the Green Belt is necessary; I have already concluded that CEC has demonstrated the exceptional circumstances necessary to release land from the Green Belt earlier in my report, and given the tight Green Belt around Macclesfield, these reasons are thrown into sharper relief at this town. The CELPS-PC increases the amount of proposed development at Macclesfield from 3,500-4,250 homes and 15-20ha of employment land, including two new housing sites and a new area of Safeguarded Land on the western fringe of the town. The Macclesfield Town Map (Fig 15.12) needs to be amended to reflect these changes and omissions, including reinstating the Strategic Employment Area **[MM37]**.

183. Existing commitments and proposed site allocations account for almost 90% of the total amount of housing apportioned to Macclesfield, and further smaller sites will be identified in the SADPDPD, helping to address housing needs. In overall terms, there is sufficient choice of sites, with a flexibility of almost 2% for housing. There are pressures to increase or decrease the amount of development allocated to the town, but the revised scale of development is proportionate to the size, role and population of the town, tempered by the constraints of Green Belt and highway capacity. In the recent past, the pressures for more housing may have been reflected by the release of some proposed employment land for new homes, but

there is little evidence to show that the proposed amount of new employment land has been overestimated. I realise that the CELPS-PC identifies almost 50% of the total amount of proposed Safeguarded Land at Macclesfield, but this is consistent with the development strategy and reflects the amount of Safeguarded Land recommended for the town in the submitted evidence [PS/E031a.5; RE/F010].

184. CEC has assessed the potential impact of the revised scale of development on existing infrastructure and the road network, including traffic modelling, air and noise pollution, identifying the necessary road/corridor improvements and mitigation measures, with costings, included in the IDPU [BE/039; RE/F012; PC/B022; RH/B002.021]. CEC has also addressed the capacity of local infrastructure, services and facilities to accommodate the proposed scale of development, through discussions with service providers, with specific provision included in the IDPU. Some participants seek a more appropriate balance between brownfield and greenfield/Green Belt sites, arguing that more development could come forward from within the urban area, reducing the need for so much development on Green Belt land; I deal with this matter under Site SL4 below.

185. In general terms, the development strategy for Macclesfield is therefore appropriate, effective, proportionate, justified and soundly based. The main outstanding issues focus on the scale and location of proposed development, including the release of Green Belt for development and Safeguarded Land and the amount of development likely to come forward within the existing urban area as a result of "windfalls", along with the implications of the proposed site allocations in terms of infrastructure, viability and deliverability, roads and traffic, landscape, conservation, heritage, ecological assets and other site-specific factors.

186. The proposed amount of new housing in *Central Macclesfield* (SL4) is based on a cautious, but realistic estimate of future development likely to occur within the existing urban area of the town (around 33 dw/year), in line with NPPF (¶ 48) and PPG [ID:3-020-021]. It is supported by evidence of past completions and future urban capacity, including planning permissions and regeneration initiatives such as Local Development Orders, with reasons for "screening out" certain sites [PS/E039; PC/B037]. The estimate of 500 dwellings over the period of the Plan is illustrative and could be exceeded, and the clarification in the CELPS-PC (Appx 1) overcomes any double-counting of windfall sites. CEC has also addressed other site-specific issues relevant to this proposal, including highways, traffic and heritage assets.

187. Some argue that much more development will come forward from sites within the urban area during the plan period, based on recent developments and planning permissions, and question whether all current commitments have been accurately recorded. However, there can be no certainty about higher levels of development coming forward in the future in the urban area, particularly since potential larger sites, such as former mills and derelict sites/buildings, could have constraints and complications; smaller sites are not large enough to be identified in this strategic plan, but could be considered again in the SADPDPD. If more of these sites do come forward, these and other windfall sites will be taken into account in the overall housing supply figures. In order to provide certainty, choice, flexibility and positive planning, there is no justification for allocating less land on Green Belt and greenfield sites. Having examined all the evidence, I consider CEC has assumed a reasonable and realistic amount of development coming forward from within Macclesfield's urban area over the plan period, and no further amendments are needed to this proposal.

188. The *South Macclesfield Development Area* (CS8) has been earmarked for an employment-led development for many years, initially in the MBLP and Macclesfield Economic Masterplan [BE/048]. Lying outside the Green Belt, development is now getting underway, despite acknowledged site constraints and fragmented land ownerships. The CELPS-PC proposes some 1,050 new dwellings, 5ha of new employment land, retail, leisure, sports facilities, greenspace and other associated uses, along with contributions towards other facilities.

189. The housing trajectory may be rather optimistic, particularly in terms of the lead-in time and annual build rates, but the overall amount and rate of development can be monitored and reviewed as detailed plans are drawn up. With several developers involved, providing a range of house types and sizes, market saturation should not be a major issue. The provision of new infrastructure, including a new link road, will be significant, but the prospective developers do not see this as seriously affecting viability or deliverability. Planning permission has been granted for housing, employment and retail uses on parts of the site, with replacement sports facilities; a masterplan has also been prepared and revised proposals are being drawn up. More detailed work is needed, but there is a reasonable prospect that most of the development will be delivered within the plan period.

190. CEC has addressed relevant site-specific issues, including the scale and mix of uses, impact on ecological assets, areas of local biodiversity and nature conservation interest, ancient woodland, traffic, landscape, water resources and Danes Moss SSSI; CEC has also addressed issues relating to the capacity of local infrastructure and the delivery of education and sports facilities and the proposed link road. Some question whether local ground conditions, including areas of peat deposits, might constrain or reduce the capacity of the site, but the prospective developers are fully aware of these constraints and have provided sufficient evidence to show that specialist techniques are available to deal with these physical factors, without seriously affecting viability or deliverability. CEC puts forward some amendments to this proposal, clarifying the overall amount of development and the protection of the Danes Moss SSSI **[MM38]**; these are needed to ensure that this long-standing sustainable urban extension is fully justified, positively prepared, effective and deliverable.

191. Planning permission has now been granted for development at *Fence Avenue* (CS9 – 250 dw), as part of a package of proposals to relocate Kings School (currently on two sites within the town) to a new greenfield site. Currently in the Green Belt, the site makes a significant contribution to Green Belt purposes, but is on the edge of the built-up area, not far from the town centre, is partly developed with buildings, and has firm, defensible boundaries. The landowners confirm that the proposal is viable and deliverable, in line with the housing trajectory. The development would utilise some open land beyond the school buildings, but the adjoining Green Belt and surrounding landscape in the Peak Park fringe would be safeguarded by the proposed area of Protected Open Space. CEC has addressed site-specific issues, including the loss of Green Belt and the impact on traffic, heritage and recreation assets. This is a sustainable site, where the exceptional circumstances needed to justify releasing Green Belt land have been clearly demonstrated, and no further amendments to this proposal are needed.

192. The proposed site at *Congleton Road* (CS10), along with the adjoining area of proposed Safeguarded Land (CS32) forms part of a general area known as the "South-West Macclesfield Development Area" (SWMDA), previously referred to in the MBLP. Currently lying in the Green Belt, it makes a significant contribution to Green Belt purposes, but CEC has demonstrated the exceptional circumstances to

justify releasing this Green Belt site. The CELPS-PC allocates Site CS10 for 300 dw and 10ha of employment land, taking account of the need for landscaping and infrastructure (6ha), with the adjoining area (CS32) as Safeguarded Land. Developers are keen to develop the housing site, and confirm viability and deliverability within the estimated timescale in a SOCG [RH/C004]. Incorporating the adjacent area of Safeguarded Land into the housing site would enable the South-West Macclesfield link road to be completed, but the additional development is not needed at this time to meet overall or local housing needs and would result in the loss of too much greenfield land too quickly. CEC has addressed other relevant site-specific issues, including loss of Green Belt, impact on ecological assets, biodiversity, landscape and Danes Moss SSSI, and traffic implications. Apart from clarifying the proposed amount of development, for consistency and effectiveness **[MM39]**, no further amendments are needed to this proposal.

193. The proposed sites south of *Chelford Road* and at *Chelford Road/Whirley Road* (CS40/41), lie on the western fringe of the urban area, within the Green Belt and make a significant contribution to its purposes; together, they are proposed for some 350 dw. Although the proposals would extend the main built-up area at Broken Cross into the surrounding countryside and reduce the gap between the main edge of the urban area and the village of Henbury (which is currently "washed over" by the Green Belt), they would not extend beyond the current extent of "ribbon" development along the main A537, lead to the coalescence of Macclesfield with Henbury, or lose its sense of separate identity. CEC has demonstrated the exceptional circumstances needed to justify releasing this Green Belt site. Developers and landowners confirm the viability and deliverability of the sites, in line with the housing trajectories [M5.3.017].

194. CEC has considered the possibility of extending Site CS40 into the area identified as Safeguarded Land (CS32), but this is not needed to meet currently identified development requirements. CEC has also addressed other site-specific issues, including assessing alternative sites, loss of Green Belt and farmland, traffic implications, site constraints, drainage, impact on ecological assets, landscape, biodiversity and the relationship to the new road link across the SWMDA. The policy also contains specific guidance on the need to protect the adjacent Cock Wood ancient woodland/Local Wildlife Site. However, the diagrams relating to Sites CS40 & CS41 need to be amended to show the correct extent of the Green Belt **[MM40 & 42]**. With these modifications, these proposals are appropriate, justified, effective and deliverable.

195. The proposed site at *Gaw End Lane* (CS11) lies on the southern fringe of the urban area, currently in the Green Belt and making a significant contribution to its purposes, but CEC has demonstrated the exceptional circumstances needed to justify releasing this Green Belt site. In the CELPS-PC, the area and capacity of the site is increased from 150-300 dw, recognising that the enlarged site can accommodate more housing, using firm and defensible Green Belt boundaries. Landowners and developers have confirmed the availability, deliverability and viability of the site in line with the housing trajectory. The development would not lead to coalescence with Lyme Green, and the proposed area of Protected Open Space would help to safeguard the adjoining Green Belt and surrounding landscape in the Peak Park fringe. CEC has addressed other site-specific matters, such as the extent of the development and impact on the Green Belt, landscape, highways, infrastructure, ecological and heritage assets, and has reviewed the boundaries of nearby designated areas. Apart from correcting the location of the adjoining Council depot, for accuracy **[MM41]**, no further amendments are needed.

196. The proposal to release some 103ha of Safeguarded Land from the Green Belt at *South West Macclesfield* (CS32) is contentious locally. Currently, this land makes a significant contribution to Green Belt purposes, but CEC has demonstrated the exceptional circumstances needed to justify releasing this Green Belt site. The proposed extent of Safeguarded Land represents a slight increase in the overall amount recommended for Macclesfield in the submitted evidence [PS/E031a.5; RE/F010 (Appx 2)], but recognises the need to identify firm and enduring boundaries for the longer-term Green Belt, and provide certainty about the longer-term Green Belt boundaries around the town. Of course, identifying this site as Safeguarded Land does not mean that it will inevitably be developed; it would not be released for development until it is identified as being needed in a future review of the CELPS. Alternative potential areas of Safeguarded Land, such as Danes Moss landfill site, have been assessed, but are unlikely to be suitable for development, even in the longer term.

197. However, in response to local concerns, there is a good case to slightly reduce the area of Safeguarded Land in the north of this site, to exclude land close to Cock Wood. This would ensure the long-term protection of this area of ancient woodland and LWS, whilst providing sufficient Safeguarded Land for longer-term development (95.7ha) with clearly defined boundaries [RH/B002.023]. This proposed modification **[MM43]** would ensure that the proposal is justified, effective and soundly based. Further reduction in the area of the site would leave a small deficit in the amount of Safeguarded Land identified at Macclesfield, and concerns about the impact of any future development on the ancient woodland could be considered if and when this is proposed.

198. Consequently, with the recommended modifications **[MM37-43]**, I consider that the development strategy and proposed site allocations for Macclesfield are appropriate, justified, effective, deliverable, sustainable, viable and soundly-based.

Alsager

199. Alsager is a long-established market town in the south-west of the Borough, not far from The Potteries. The strategy for the town aims to boost economic growth, increase job opportunities and reduce overall out-commuting. It is constrained by the Green Belt, but its location close to the M6 makes it an attractive location for investment, including regenerating and expanding the established employment area at Radway Green. As a Key Service Centre, there is little dispute that it should be allocated a fair proportion of the overall amount of development.

200. The CELPS-PC allocates 2,000 new homes and 40ha of new employment land to the town. Constraints on the local highway network make further growth difficult to achieve without improvement or mitigation. CEC has undertaken specific studies to assess the cumulative traffic implications of the committed and proposed developments [PS/E038; PC/B022]; several road and junction improvements have been identified in the IDPU, with details of funding, timing and delivery. CEC proposes further work to investigate cross-boundary traffic flows relating to the proposed developments at Alsager and further traffic assessments will be undertaken when detailed schemes are drawn up for each site. I also understand that Stoke-on-Trent & Newcastle Councils are generally content with the proposed amount of development and the strategic allocations at Alsager.

201. Many of the proposed housing sites now have planning permission, and the housing trajectories and proposed employment sites are supported by prospective developers; existing commitments are also included in the figures for Alsager.

The amount of proposed development gives sufficient flexibility for both housing (2.5%) and employment development. However, the Alsager Town Map needs to be updated to reflect detailed changes in site layouts and current commitments **[MM44]**. I have already dealt with the overall spatial distribution and allocation of development to the main settlements such as Alsager earlier in my report and, in general terms, the development strategy and amount of development proposed for Alsager is appropriate, justified, proportionate, effective, deliverable and soundly based. The main issues focus on the deliverability of the proposed allocations and the justification for the proposed scale and location of new employment land at Radway Green.

202. *White Moss Quarry* (CS42) has been fully assessed through the site-selection and SA process and now has planning permission (350 dw). CEC has addressed relevant site-specific issues, including highways, accessibility, flood risk and the potential impact on nearby RAMSAR/SSSI sites and other ecological assets, and there are no outstanding issues. I also understand that there is no conflict between the current development proposals and mineral extraction/restoration. Some participants argue that the site would be better used for employment purposes, but it is not being promoted or suitable for such uses and would conflict with current housing proposals. The suggested extension of the site would represent an "omission" site, which is not necessary or appropriate at this stage. Apart from clarifying the amount of new housing **[MM45]**, for consistency and effectiveness, no further amendments are needed to this proposal.

203. *Twyfords/Cardway* (CS12) largely comprises existing employment development, much of which is previously developed land/buildings and is now redundant. The site is available and suitable for the proposed uses, and several planning permissions have now been granted, for both housing and retail uses, with further land remaining to make up the balance of development. Viability and deliverability have been confirmed with prospective developers. CEC has addressed other relevant site-specific issues, including the impact of the proposed development on existing/retained employment uses and on the nearby RAMSAR/SSSI sites and other ecological assets, as well as the relationship with required road junction improvements. Apart from clarifying the amount of housing and contributions to improvements to town centre accessibility, for consistency and effectiveness **[MM46]**, no further amendments are needed to this proposal.

204. The *Former Manchester Metropolitan University Campus* (CS13) is surplus to education requirements and has been considered for redevelopment for some time, having been included in the Congleton Borough Local Plan. Proposals for new housing (426 dw) and sports pitches are now well advanced, with developers committed to the development in line with the proposed housing trajectory and a resolution to grant planning permission. CEC has addressed relevant site-specific issues, including the impact on education and employment uses, sport and recreational facilities, highways and nearby RAMSAR/SSSI sites. Apart from clarifying the amount of housing, contributions to road junction improvements and town centre accessibility, and retention of trees and hedgerows, for consistency and effectiveness **[MM47]**, no further amendments are needed to this proposal.

205. *Radway Green* is a long-established employment location on the western side of Alsager, centred on the BAE Systems factory. It is of strategic importance, being within the M6 motorway growth corridor, with good access available from the B5077. The amount of employment land now proposed (37ha) is appropriate and proportionate to the employment growth required in Alsager. The latest proposals comprise a brownfield site (CS14) and two greenfield sites (CS15 &

CS43), one of which is currently in the Green Belt. These sites have been fully assessed through the site-selection and SA process [PC/B008] after considering reasonable alternatives. CEC has demonstrated the exceptional circumstances needed to justify releasing Green Belt land, but here the justification is also based on the strategic need for more employment land in Radway Green, given its particular locational characteristics, close to transport nodes and the M6 growth corridor, as well as the general lack of other suitable sites to meet the overall scale of new employment land needed in the Borough. There is a need to meet the particular employment needs of individual towns, and so it is appropriate to use the sequential test relating to flood risk on a town-by-town basis.

206. CEC has addressed relevant site-specific issues, including the impact on heritage assets, existing employment uses and on nearby RAMSAR/SSSI sites. Flood risk, phasing, access and traffic issues, including the need for improvements to the M6 junction and the level crossing, with schemes identified in the IDPU, have also been addressed. Prospective developers have confirmed the availability, viability and deliverability of these proposals, and some of Site CS15 would be suitable for Class B8/logistics uses. CEC has assessed smaller non-Green Belt sites immediately to the south of the BAE Systems factory, but there is no confirmation of availability [RH/B002.026]; these sites can be examined again as part of the SADPDPD. Some argue that a more intensive development should be proposed, using existing brownfield land within the BAE Systems site, but neither this land, nor Site CS14 and other existing employment sites would constitute "new" employment land, and so it cannot be counted towards meeting the overall requirement for new employment land.

207. However, to be effective and justified, amendments are needed to delete the requirement to provide open space and community facilities (CS14), to recognise the importance of recording archaeological/heritage assets (CS14), to amend the requirement for pedestrian/cycle links and clarify the amount and phasing of employment development (CS15/CS43), and address watercourse and flood risk issues (CS43) **[MM48-50]**. With these recommended modifications, the proposals for Radway Green would be appropriate, justified, effective and soundly based.

208. Consequently, with these recommended modifications **[MM44-50]**, the development strategy and proposed site allocations for Alsager are appropriate, justified, effective, deliverable, sustainable, viable and soundly-based.

Congleton

209. Congleton is an historic market town, designated as a Key Service Centre in the settlement hierarchy, and there is little dispute that it should accommodate a significant amount of new development. The development strategy emerged from the Congleton Town Strategy and focuses on high quality employment-led growth to enable the expansion of existing businesses and attract new investment to the town; it also involves a significant amount of new housing to provide a balanced and integrated portfolio of development to support the town centre, provide balanced and sustainable communities and deliver the Congleton Link Road (CLR). The CELPS-PC allocates 4,150 new homes and 24ha of new employment land to the town, focusing most new housing and employment development around the northern fringe to assist the delivery of the CLR, fully meeting the apportionment to the town, with a 9% flexibility factor.

210. The CLR is a major infrastructure project which will not only help to enable employment growth, but also open up new development sites around the northern fringe of the town, improving strategic transport links and access to existing and new employment and housing areas, as well as creating a sustainable urban extension and alleviating existing traffic congestion. CEC proposes to highlight the importance of the CLR in the strategy for Congleton, update its funding strategy and delivery timescale, and clarify the required Corridor of Interest **[MM51]**; these amendments are necessary for clarity and soundness.

211. CEC has assessed the potential impact of the revised scale of proposed development on the existing and future road network [BE/038; RE/F014; PC/B004-005; PC/B022]. None of the sites are in the Green Belt, most now have planning permission, and the housing trajectories are supported by the developers. On this basis, the development strategy and proposed amount of development are appropriate, proportionate, justified, effective, deliverable and soundly based. The main issues are the concentration of most new development around the northern fringe of the town, with concerns about deliverability, viability and market saturation, along with the associated delivery of the CLR.

212. The site allocations around the northern fringe of the town (CS44/CS45/CS16/ CS46/CS17) total almost 2,500 dw and 20ha of new employment land, bounded for the most part by the CLR. The North Congleton Masterplan [RE/F018] has been drawn up to secure comprehensive development of the area. Although in several ownerships, most of the sites now have planning permission, and the prospective developers are committed to their developments, confirming viability and phasing, with work now underway on some sites. With the expected number of developers, range of sites, house types and phasing of development throughout the Plan period, "market saturation" should not be an issue. The CLR is essential to the delivery of these sites and to resolve long-standing economic and environmental conflicts caused by current traffic congestion in the town. CEC has addressed the practical arrangements for delivering this new road scheme, now with planning permission, including funding, timing and developer contributions, and completion is now programmed by 2020. Delays in the delivery of the CLR could delay or slow down the rate of housing completions, but there is little current evidence to suggest that serious delays might occur; a CPO inquiry is currently scheduled.

213. CEC has addressed other relevant site-specific issues, including the amount and mix of land-uses, the need for a comprehensive development, the provision of local facilities, the potential impact of development on local wildlife sites and on the operation of Jodrell Bank, and the possible extension of Site CS45; further assessment will be needed at the planning application stage. There are some concerns about one site (CS44) extending beyond the outer boundary formed by the CLR, but this is a well-contained area with limited impact on the wider landscape, and is needed to facilitate the overall scale of development. Issues relating to the possibility of using part of the Congleton Business Park (CS45) for waste-related uses would more appropriately be considered in the forthcoming M&WDPD. Detailed site designations are shown on the Policies Map, including wildlife corridors, and the detailed location of specific facilities would more appropriately be considered at the planning application stage. On this basis, the strategy for a new sustainable urban extension around the northern fringe of the town, delivering the CLR, is appropriate, fully justified and soundly based.

214. CEC proposes to amend the supporting text and diagrams to clarify the role, status, funding, developer contributions, delivery and extent of land-take needed to deliver the CLR, clarify the capacity and delivery of the proposed sites and the

approach to affordable housing, and amend the development requirements for some of the sites (CS44/CS45), including the status of Westlow Mere and provision of public open space **[MM52-56]**. These amendments are needed to ensure the proposals are up-to-date, sustainable, deliverable, effective and soundly based.

215. *Tall Ash Farm* (CS47 – 225dw) lies on the eastern side of the town, and now has planning permission. CEC has addressed relevant site-specific issues, including the potential impact of the development on heritage and ecological assets and on the adjoining countryside, and its relationship with the CLR. Apart from clarifying the purpose of developer contributions towards the CLR or A34 improvement and the need for a suitable transition between the urban area and the countryside **[MM57]**, to ensure that the proposal takes effective account of site-specific factors, no further amendments are required to this proposal.

216. *Land North of Lamberts Lane* (CS48 – 225dw) lies on the southern side of the town, and now has planning permission. CEC has addressed relevant site-specific factors, including connectivity to the town and the potential impact of development on heritage and ecological assets. Apart from clarifying connectivity requirements and the need to consider long-distance views from the Macclesfield Canal **[MM58]**, to ensure that the proposal takes effective account of site-specific matters, no further amendments are needed.

217. Consequently, with the recommended modifications **[MM51-58]**, the development strategy and proposed site allocations for Congleton are appropriate, justified, effective, deliverable, sustainable, viable and soundly-based.

Handforth

218. Handforth is one of the smaller towns in the north of the Borough designated as a Key Service Centre. It is in a sustainable location, adjoining Wilmslow, bounded by the A34 By-Pass and the Stockport MBC (SMBC) boundary. It has good road and rail links and a wide range of facilities and services, but is constrained by the Green Belt. As well as providing land to meet its own needs, the development strategy identifies Handforth as a suitable location for a new settlement to assist in meeting development needs arising from the northern part of the Borough. It provides a significant number of new houses in a high-demand residential area, along with employment growth, recognising the town's locational advantages, close to the Greater Manchester conurbation and the Airport Enterprise Zone.

219. CEC has decided that this is the most appropriate location in the north of the Borough for one large strategic allocation to meet the needs of this sub-area, rather than distributing development across the northern towns in proportion to their size and population; providing a new settlement within the northern sub-area of the Borough is a central part of the CELPS strategy. The CELPS-PC allocates 2,200 homes and 22ha of employment land to Handforth, of which 1,500 dw and 12ha of employment land would be at the North Cheshire Growth Village (NCGV).

220. Both the development strategy for Handforth and the NCGV are controversial, not only locally, but also with landowners and developers. However, CEC has selected this strategy and the proposed sites after thoroughly assessing alternative options and sites, including sites for new settlements, both around Handforth and the other northern towns [RE/F010; PS/E035-036; PS/E039; PC/B013]. In Handforth, there currently seem to be few potential brownfield sites which are suitable and available for development and no potential sites outside the Green Belt; sites making a lesser contribution to Green Belt purposes are not suitable or available

for development or have other constraints [PC/B013]. CEC has worked with SMBC to ensure that the proposals for Handforth are positively prepared, including the relationship with new road schemes and development within Stockport [PC/B036].

221. Of course, there could be other development strategies based on alternative spatial distributions and allocations of development. But as I have said before, CEC's assessment is the only comprehensive, consistent and objective study, which examines all the settlements in the Borough and all reasonable options, including those outside and within the Green Belt [PS/E034; PS/E035]. To consider dispersing the amount of development proposed at Handforth around the other northern towns would not be compatible with the overall strategy or consistent with the evidence supporting the revised spatial distribution of development. Furthermore, the overall scale of development proposed at Handforth seems to represent a reasonable threshold for providing the necessary additional facilities and services, as well as supporting existing facilities, services and employment.

222. CEC has addressed the individual and cumulative impact of the proposed developments on the existing infrastructure and road network, including traffic modelling and identifying any necessary road/junction improvements to the A34/A555 corridors and associated links and multi-modal improvements, set out in the IDPU [PC/B022; PC/B033; PS/E036]. This has taken account of new and proposed road schemes, including the A6MARR, SEMMMS and Poynton Relief Road; further traffic modelling work is underway on the A34 Corridor and SEMMMS refresh [RH/B002.001]. SMBC remains concerned about the overall traffic impact of the proposed developments in the north of Cheshire East, but work is ongoing to address these issues with SMBC and GMCA [RE/F021].

223. CEC confirms its commitment to a new multi-modal cross-boundary strategy, led by SMBC, to manage future increases in traffic and prioritise transport infrastructure in the medium-longer term, including a refresh of the SEMMMS study and concept plans for highway improvements; updated detailed Transport Assessments will also be undertaken at the planning application stage. Although several participants argue that this work should have been completed before decisions were made to allocate large-scale growth at Handforth, I am satisfied that the nature and amount of work already undertaken identifies the key implications and improvements required, and is proportionate and effective. CEC has also assessed the capacity of existing facilities and services to accommodate the proposed developments, in liaison with the relevant service providers, and new facilities are set out in the IDPU. In view of the overall scale of development allocated to Handforth, no flexibility factor is provided, but a small amount of additional housing and employment land will need to be identified in the SADPDPD to fully meet the proposed allocation for the town.

224. On this basis, the development strategy for Handforth and amount of development proposed is appropriate, positively prepared, justified, effective, deliverable and soundly based. The main outstanding issues relate to the location and scale of proposed development, particularly the NCGV and Safeguarded Land, the implications for the Green Belt and surrounding areas, including the exceptional circumstances for releasing such land, the viability and deliverability of the proposed site allocations, the capacity of the existing and proposed road network and facilities to accommodate the developments and whether all relevant site specific factors have been addressed.

225. The *North Cheshire Growth Village* (CS30) is particularly contentious to the local community and some developers. However, it has been selected after considering all reasonable alternative sites and strategies, using the agreed methodology and after having demonstrated the exceptional circumstances necessary to justify releasing Green Belt land, both in overall terms and locally[PS/E034-035; PC/B013]. The site lies on the far side of the main A34 By-Pass, and although the NCGV would breach this firm boundary and parts of the site currently make a major contribution to the Green Belt, sufficient Green Belt remains to avoid further encroachment into the surrounding countryside; firm and enduring Green Belt boundaries also exist along existing roads and other features.

226. Although the gap between Handforth and the built-up area of Bramhall/Woodford in Stockport would be reduced, there would be no coalescence between the existing communities, given the extent of Green Belt remaining around the site and the presence of the main A555. The designation of Protected Open Space and other areas of planting and landscaping around the periphery of the site, retained within the Green Belt, would also help to safeguard the adjoining areas of Green Belt. It is also worth noting that parts of the site comprise existing development, including a leisure centre and Ministry of Defence offices, and previously used for aircraft/military operations/maintenance depot during the wartime (former RAF Handforth); some of this site now represents under-used publicly-owned land.

227. CEC has undertaken strategic traffic modelling work to assess the traffic implications of the NCGV, taking into account the existing and future road network, including the A6MARR, A34 and Poynton Relief Road [RE/F015; PC/B022; PC/B013]; further work will be undertaken with Stockport MBC as part of the A34 Corridor plan and SEMMMS refresh work [PC/B036; RH/B002.001]. CEC confirms that access is available to the site off the main A34 By-Pass, and that, with appropriate mitigation, the proposal is deliverable in transport terms; further detailed traffic studies will be undertaken as the proposal progresses, but there is no current evidence which shows that the residual traffic impact of NCGV would be severe.

228. The housing trajectory is somewhat optimistic, particularly in terms of lead-in time and build rates. However, preliminary work is progressing well and, with several developers involved, there is a reasonable prospect that most of the development will be implemented within the plan period. Developers are fully committed to progress the development, have undertaken much preparatory work, including exhibitions, masterplans and detailed reports, and have confirmed deliverability and viability [PC/M5.6.014]. However, CEC intends to reduce the overall capacity of the site from 1,650-1,500 dw to reflect the latest masterplan and development trajectory, giving more certainty about the scale of development to be delivered within the plan period **[MM51]**.

229. CEC has also addressed other relevant site-specific issues, including the extent, amount and mix of proposed uses, loss of Green Belt and farmland, impact on heritage, biodiversity and ecological assets, site/development constraints, infrastructure, drainage and the capacity of existing health, community and education facilities; a wealth of detailed technical evidence in support of the proposal has also been submitted, covering traffic and access, flood risk, ground conditions, pollution, archaeology, heritage and ecology [PC/B013]. CEC confirms that areas of wildlife interest can be safeguarded and incorporated into the proposed development, within green corridors and other open spaces. As a sustainable new community, NCGV would be large enough to provide a range of new facilities, as well as supporting the existing services in Handforth. CEC accepts that more school accommodation will be needed, and options are being

considered with Wilmslow High School and other providers. I also understand that the NCGV is now one of the sites identified nationally for a new "garden village".

230. On this basis and having considered all the representations, evidence and discussions, I conclude that the principle of this new sustainable development is appropriate, justified with proportionate evidence, positively prepared, effective, deliverable and soundly based, and meets the terms of the NPPF (¶ 52). Apart from amending the capacity of the site **[MM51]**, for effectiveness and consistency, no further modifications are needed to this proposal.

231. A further area of land adjoining the NCGV is identified as Safeguarded Land (CS34 – 14ha). This land is not allocated for development at this time, and would only be released if needed as a result of a subsequent review of CELPS. However, CEC has demonstrated the exceptional circumstances to justify releasing Green Belt land in overall terms [PS/E034], and this allocation would help to meet the overall requirement for Safeguarded Land [PS/E031a.5]. It would also offer the possibility of providing a modest logical extension to the NCGV if needed in the future.

232. Another housing proposal at *Clay Lane/Sagars Road* (CS49 – 250 dw), on the western edge of the town, is locally contentious, particularly as regards traffic and access, as well as loss of Green Belt. However, although it makes a limited contribution to Green Belt purposes, it would provide a logical extension to the existing built-up area and is physically well-contained by firm boundaries along Clay Lane & Sagars Road. CEC has demonstrated the exceptional circumstances needed to justify releasing this Green Belt site. Both CEC and the prospective developers confirm that there are no fundamental reasons why a safe and suitable access could not be provided to serve the development, with several practical options identified; this issue will be addressed in more detail at the planning application stage. CEC has addressed other relevant site-specific issues, including ecology, flooding/drainage, accessibility, traffic generation and the impact on the gap between Handforth and Styal. The prospective developers also confirm that the site is viable and deliverable, in line with the housing trajectory [PC/M5.6.012]. On this basis, the proposal is appropriate, justified, effective, deliverable and soundly based, and no further modifications are needed.

233. I understand that proposals for further development at Woodford Aerodrome, to the east of Handforth, and elsewhere in Stockport are included in the draft Greater Manchester Spatial Framework (GMSF). However, there is no evidence that the proposed strategy for Handforth, including the NCGV, would undermine the regeneration of Greater Manchester or put at risk the extent of Green Belt within Cheshire East or Stockport MBC. In any event, the GMSF is only an initial consultation draft and the final submission version may change, so it can have very little influence on my conclusions on the soundness of the development strategy for Handforth at this stage.

234. Consequently, with the recommended modification **[MM51]**, I consider that the development strategy and proposed site allocations for Handforth, including the North Cheshire Growth Village, are appropriate, justified, effective, deliverable, sustainable, viable and soundly-based.

Knutsford

235. Knutsford is an historic market town in the north-west of the Borough, tightly constrained by the Green Belt. The development strategy for the town seeks to accommodate a modest level of housing and high-quality employment growth,

reflecting its size and function as a Key Service Centre and good location in terms of strategic transport networks. It also recognises its distinctive character, whilst minimising harm to the Green Belt, given the lack of available land within the urban area.

236. The CELPS-PC allocates 950 new homes and 15ha of new employment land to Knutsford, largely focused on the north-western and eastern fringes of the town. This is somewhat less than that which might be expected on a proportionate basis, due to Green Belt constraints and potential effects on biodiversity and local highways, but slightly more than originally proposed in the CELPS-SD; it also incorporates 5% flexibility in terms of new housing. This development strategy has some support from local community groups, and in general terms, is appropriate, justified, effective, deliverable and soundly based. However, the Knutsford Town Map needs amending, to take account of updated detailed site boundaries and layouts **[MM60]**.

237. CEC has assessed the potential impact of the revised scale of development on the existing road network, including traffic modelling and identifying the necessary mitigation and road improvements, such as A50/A537 junctions/corridors [PC/B022; PC/B024; PC/B039]. The outstanding issues relate to the location, mix of land uses, delivery and viability of the proposed site allocations.

238. The proposals at *North-West Knutsford* (CS18/CS53/CS33) envisage some 500 new houses, 7.5ha of employment land, areas of Protected Open Space and 11ha of Safeguarded Land. Although these sites make a significant contribution to Green Belt purposes, they are in a sustainable location on the north-western fringe of the town. CEC has also demonstrated the exceptional circumstances needed to justify releasing this Green Belt site. Masterplans are being drawn up to ensure the comprehensive development of the area, and prospective developers support the proposals, having confirmed phasing, viability and deliverability. The proposed area of Safeguarded Land is integral to the overall proposal, but would not necessarily prejudice future development. CEC has addressed other site-specific issues, including the loss of Green Belt, the potential impact on heritage assets (such as Tatton Hall & Park), sports facilities and nearby RAMSAR/SSSI sites, the requirements for landscaping, green infrastructure and access, and the delivery of road improvements and local community facilities.

239. CEC has also addressed the layout, height, phasing and mix of housing, employment, open space and Safeguarded Land, and further details will be considered when planning applications are submitted. After discussions with landowners, developers and the National Trust [PC/M5.7.001; Appx 1], CEC proposes to make some changes to the proposals and accompanying text, to clarify the amount of development, location and provision of land uses, the status and nature of public open space (including Protected Open Space), and contributions to road improvements **[MM61]**. These amendments are needed to ensure that the proposals represent an appropriate, justified, effective and deliverable sustainable urban extension to Knutsford. There are some suggestions for some further amendments to the revised policy wording and requirements, but I consider these are unnecessary in a strategic plan; further details can be considered when planning applications are submitted or as Additional Modifications.

240. *Parkgate Extension* (CS19) is proposed for 200 dw and 6ha of employment land. This site was originally allocated for employment uses in 2004 (MBLP) and planning permission for the housing element was granted in 2014. The site lies within Knutsford's settlement boundary, outside the Green Belt, and the proposal

is supported by prospective developers, including the housing trajectory. CEC has addressed relevant site-specific issues, including the capacity and extent of the site and the density and height of the development, its potential impact on heritage assets and on nearby RAMSAR/SSSI sites, and access arrangements. Apart from clarifying the amount of proposed housing, for consistency and effectiveness **[MM62]**, no further changes are needed to this proposal. Further detailed concerns can be addressed when planning applications are submitted.

241. *Land South of Longridge* (CS50/51) is proposed for around 225 new dwellings, now that CEC has decided to extend the site to incorporate the area formerly identified as Safeguarded Land (CS51); this would enable a comprehensive and viable scheme, now that traffic concerns have been addressed [PC/B024; PC/B039], and may have some regeneration benefits to the adjoining housing area. CEC has addressed other site-specific issues, including the loss of Green Belt, deliverability and viability of the proposal and its potential impact on nearby RAMSAR/SSSI sites and Booths Mere LWS. Apart from extending the area and capacity of the site, and deleting the former area of Safeguarded Land, CEC proposes to clarify the protection of the nearby RAMSAR/SSSI and local wildlife sites **[MM63-64]**. These amendments would ensure that the proposal is effective, deliverable and justified, in sufficient detail to ensure the sustainable development of the site; more detailed concerns can be addressed at the planning application stage.

242. *Land adjacent to Booths Hall* (CS52) is identified as Safeguarded Land (8.7ha). CEC has addressed the need to release this site from the Green Belt in terms of the exceptional circumstances test and identifying sufficient Safeguarded Land with future development potential. As Safeguarded Land, this site may become available for development in the future, if a need is identified in a future review of the CELPS. The redevelopment of existing employment land within the Booths Hall complex would not count towards the provision of new employment land. CEC has also considered and reviewed the possibility of allocating further land at Booths Park for housing and/or employment development [PS/E034; PC/B014], but this is unnecessary in terms of meeting currently identified overall and town-based development requirements. No further amendments are needed to this proposal in terms of soundness.

243. On this basis, with the recommended modifications **[MM60-64]**, the development strategy and proposed site allocations for Knutsford are appropriate, justified, effective, deliverable, sustainable, viable and soundly-based.

Middlewich

244. Middlewich is a long-established market town on the western side of the Borough, close to the M6 corridor and designated as a Key Service Centre. The development strategy seeks to boost economic growth by further developing the Midpoint 18 employment area and completing the Middlewich Eastern By-Pass (MEB), along with some new housing in the town centre and on the southern fringe of the town; the MEB is essential to accommodate the planned growth of the town and alleviate current traffic congestion in the town centre. The CELPS-PC allocates 1,950 new homes and 75ha of new employment land to Middlewich. However, the Middlewich Town Map needs amending to reflect changes to the status and detailed boundaries of particular sites and other proposals **[MM65]**.

245. CEC has considered the potential impact of the revised scale of development on the existing and future road network, with further commitment to the timing, funding and delivery of the MEB [PC/B022], as set out in the IDPU; the MEB is now

planned for completion by the end of 2020 [PCM/5.8.001]. With the long-standing aspiration to re-open the Sandbach-Northwich railway line for passenger use, there is also the opportunity to provide a new railway station for the town. As part of the DtC, CEC is discussing with Cheshire West & Chester Council the possibility of developing land off Centurion Way, which could be progressed further in the SADPDPD [PC/B036], reflecting the specific policy (STRAT7) in the now adopted CW&CLP. In general terms, the development strategy for Middlewich and the amount of development are appropriate, justified, proportionate, effective and soundly based, with sufficient flexibility. The main outstanding issues concern the balance between housing and employment development and deliverability of the allocated sites, particularly the expansion of Midpoint 18 (CS56) and the Brooks Lane housing area (CS54).

246. As regards the balance between new housing and employment development, the CELPS-PC clearly allocates much more employment land than that for housing. However, this is to make effective use of existing allocated, but undeveloped, employment land at Midpoint 18 and ensure the completion of the MEB. It would also help to promote significant employment opportunities to provide a better balance of local jobs and housing, whilst providing infrastructure improvements to support new development and alleviate existing congestion. The CELSP-PC has increased the amount of housing at Middlewich from 1,600-1,950 dw, with a 2.6% flexibility factor, leaving some smaller sites to be identified in the SADPDPD.

247. The *Brooks Lane* area is an established employment location, with many local businesses on a variety of small and larger sites, and the introduction of new housing clearly raises some challenges. However, it is in a highly sustainable location, in the heart of the town, offering a brownfield site with ready access to local facilities. This site allocation (CS54) is now proposed as a Strategic Location (SL9) for 200 dwellings (reduced from 400dw), rather than a specific site, reflecting the challenges of site assembly, viability and the presence of existing businesses; there is also the need to carefully consider the relationship between new homes and existing businesses in terms of residential amenity and the ability of businesses to continue operating without constraint. Previous work highlighted potential viability problems, but the reduction in the number of houses and the likelihood of new housing being focused on areas close to the canal waterfront may help to overcome these concerns.

248. Moreover, plans are well advanced for a mixed-use development here, with 150 dwellings, retail, marina and other uses on a 2.89ha site fronting the Trent & Mersey Canal, and other potential redevelopment sites have been highlighted by prospective developers and land owners. CEC has addressed key site-specific issues, including flood risk, impact on existing employment uses, archaeological and heritage assets, and the possibility of providing a new railway station, and confirms that no new access would be needed for the amount of housing now proposed [RH/B002.036]. On this basis, there is a reasonable prospect that the proposed amount of new housing will be delivered within the Plan period. However, some amendments to the policy and accompanying text and diagram are needed to clarify the status of the allocation as a Strategic Location and the amount of new housing **[MM67]**. With these modifications, the proposal would be justified, effective, deliverable and soundly based.

249. Proposed housing sites at *Glebe Farm* (CS20) and *Warmingham Lane* (CS55) have planning permission or a resolution to grant planning permission, and the housing trajectories and viability have been confirmed with prospective developers. CEC has addressed relevant site-specific issues, such as the potential

impact on heritage assets and the relationship with the MEB, including appropriate contributions to this road scheme; the latest assessment of capacity reflects recent planning permissions and discussions with developers and landowners. Although both sites are on the southern fringe of the town, they are in sustainable locations, with ready access to local facilities. Apart from clarifying the amount of new housing proposed at Site CS20, for consistency and effectiveness **[MM66]**, no further amendments are needed to these proposals.

250. *Midpoint 18* (CS56) has been promoted for employment development for some time, having been included in the CBLP (2005), but there have been delays in developing the area due to problems in completing the MEB. However, obstacles overcoming the completion of the MEB now seem to have been overcome, with funding, timing and delivery confirmed in the IDPU; this new road scheme will help to release further employment land for development and ensure the delivery of both the new road and the employment proposal. CEC has addressed other relevant site-specific issues, including the extent of development and nature of employment uses, viability, flood risk and the possibility of providing a new railway station. The site is allocated for a range of Class B1, B2 & B8 uses, which could include some logistics uses, given the good links to the M6 motorway. Recent take-up of employment land in this area has been relatively low and the amount of development expected to come forward (70ha of a total undeveloped area of over 120ha) is substantial. However, developers and landowners are fully committed to delivering this strategic employment site, with various planning permissions and active marketing and proposals; with firm commitment to the completion of the MEB, there is a reasonable prospect that this proposal will be delivered during the course of the current Plan period. No further amendments to this proposal are therefore needed in the interests of soundness.

251. Consequently, with the recommended modifications **[MM65-67]**, the development strategy and proposed site allocations for Middlewich are appropriate, justified, effective, deliverable, sustainable, viable and soundly-based.

Nantwich

252. Nantwich is an historic market town in the south-western part of the Borough, not far from Crewe, which functions and is designated as a Key Service Centre. However, there are environmental constraints to growth arising from the presence of heritage assets and the Strategic Green Gap. The development strategy for the town emerged from the earlier Town Strategy [BE/096], and expects the town to accommodate development of a scale, location and nature that recognises its distinctive, historic character and supports its vitality and viability. The CELPS-PC proposes 2,050 new homes and 3ha of new employment land at the town, which is proportionate to its current size and role. However, the Nantwich Town Map needs amending to reflect detailed changes in site boundaries and proposals **[MM69]**.

253. CEC has considered the potential impact of the revised scale of development on the existing and future road network, including the road improvements needed for the Kingsley Fields development in the IDPU [PC/B022]; further transport assessments will be undertaken when detailed schemes are drawn up. The proposed development strategy, which focuses most new development at Kingsley Fields, is appropriate, justified, effective, deliverable and soundly based. The main issues concern the proposed amount of development proposed at Nantwich, the deliverability of the Kingsley Fields site and the lack of other development sites.

254. Some participants argue that more housing development should be allocated to Nantwich, given the absence of other new sites and its close relationship to Crewe. However, Nantwich has seen significant new housing development in the recent past and, with existing commitments and future proposals, is well on the way to meeting its overall apportionment. Further development would almost inevitably involve additional greenfield sites, which could adversely affect the character and setting of the town and the adjoining Strategic Green Gap. The Plan already provides some flexibility in housing provision (6.4%) and no further sites are needed to meet currently identified housing needs.

255. As regards specific sites, outline planning permission for a mixed-use development of up to 1,100 new homes and 1.82ha of employment and community uses at *Kingsley Fields* (CS21) was granted in 2016, and CEC is considering detailed matters. A masterplan has been drawn up, and three house-builders will be involved in this development, with the housing delivery rate having been confirmed with them. CEC has addressed relevant site-specific issues, including the extent and mix of proposed uses, potential impact on heritage assets, flood risk and biodiversity, the delivery of green infrastructure and new link road/ highway improvements; detailed plans for the Waterlode link road and realignment of the A51 are being drawn up and will be funded by the development, as confirmed in the IDPU. On this basis, the site is sustainable, viable, deliverable, justified and soundly based. However, some amendments are needed to safeguard public access along the River Weaver, to include Henhull Farm and riverside land and ensure the retention of this designated heritage asset, including a Heritage Impact Assessment **[MM70]**. With these amendments, the proposal would be effective and deliverable.

256. *Snow Hill* (CS23) is allocated to recognise the potential for a limited scale of redevelopment (about 60 dw) in Nantwich town centre. The site was identified as a result of the site-selection process, and there is evidence that redevelopment proposals are coming forward (including on land off St Anne's Lane). CEC has addressed relevant site-specific issues, including the impact on town centre parking, flooding, the Conservation Area and archaeological/heritage assets (highlighted in the Nantwich Waterlogged Deposits Report [PC/B026]). With further reference to these matters in the supporting text and tables **[MM71]**, the proposal would be effective, deliverable and soundly based. A housing site previously proposed at *Stapeley Water Gardens* (CS22) is now under construction and no longer needs to be allocated, as confirmed in the CELPS-PC.

257. Consequently, with the recommended modifications **[MM69-71]**, the development strategy and proposed site allocations for Nantwich are appropriate, justified, effective, deliverable, sustainable, viable and soundly-based.

Poynton

258. Poynton is an established town on the northern edge of the Borough, bordering Hazel Grove in Stockport MBC. It is designated as a Key Service Centre, but is tightly constrained by the Green Belt. The development strategy for the town focuses on providing high-quality housing-led growth to accommodate the needs of the town and help deliver the Poynton Relief Road (PRR), along with some new employment land to accommodate the expansion needs of existing businesses, addressing the current shortage of local jobs and reducing current levels of out-commuting, whilst recognising the scale and distinctiveness of the town. The CELPS-PC increases the allocation to Poynton from 200 to 650 new homes and 10ha of employment land, with a flexibility of 6.6% for new housing, including

three new strategic housing sites on the fringes of the town and an extension to the Adlington Business Park. This recognises the need for more development at Poynton, to reflect its size and status in the settlement hierarchy, and the need to meet existing and future housing and employment needs. This is much less than might be expected in proportion to its size and population, due to Green Belt constraints, but somewhat more than previously proposed in the CELPS-SD.

259. CEC acknowledges that the amount of proposed development would not fully meet the needs arising from Poynton, but highlights its continuing role as a commuter settlement, along with other housing and employment opportunities in Stockport and Manchester, including current and future development at the former Woodford Aerodrome and the NCGV not far away at Handforth. Given the relatively few housing completions in recent years, there is clearly a need for some new housing at Poynton to help meet local and market needs. However, the CELPS-PC does not allocate sufficient sites to fully meet the proposed apportionment for Poynton; sites for some 200 dw will need to be identified in the subsequent SADPDPD and/or emerging Neighbourhood Plan, which could include new greenfield sites and brownfield sites from within the existing urban area.

260. CEC has selected the site allocations in line with the established methodology, assessing a wide range of alternative sites, including those promoted by others, most of which lie in the Green Belt and currently make a significant contribution to Green Belt purposes [PC/BE018]. By focussing most development at Poynton around other areas of the town, the strategy has taken account of major new housing developments at the nearby former Woodford Aerodrome and the impact of the new SEMMMS/A6MARR on the Green Belt, including the requirements for infrastructure, services and facilities. SMBC is content with the specific site allocations, but retains concerns about the overall impact on traffic and transport of proposed developments in the towns in the north of the Borough. There is considerable local concern about the release of Green Belt land, but as I have said before, CEC has demonstrated the exceptional circumstances necessary to justify the release of such land, including the specific Green Belt sites at Poynton; this issue is thrown into sharper relief at Poynton, where there is little land within the urban area outside the Green Belt which is available and suitable for the scale of development proposed for the town. Moreover, CEC has thoroughly assessed the likely contribution from brownfield/windfall sites from within the urban area.

261. CEC has undertaken strategic traffic modelling work for the proposed allocations in the north of the Borough, which take into account the existing and proposed road network in and around Poynton, including the A6MARR and PRR, using the best available evidence of future development growth and traffic conditions [PC/B018; PC/B022]; further work will be undertaken in association with SMBC as part of the SEMMMS refresh work. An additional reference to the need for junction improvements along the A523 corridor will help to ensure that the links to Macclesfield are improved **[MM72]**. CEC has also worked with SMBC to ensure that the proposals for Poynton are positively prepared, including the relationship with proposed road schemes and developments at Woodford Aerodrome [RE/F021; PCM5.10.001], which constitutes a major developed site in the Green Belt, previously a former airfield with large aircraft manufacturing buildings.

262. The proposed PRR has advanced significantly since the publication of the CELPS-SD, now that a preferred route and detailed scheme has been drawn up, with funding and delivery details set out in the IDPU; the PRR is now expected to be completed by the end of 2019 as a joint scheme with SMBC, and some of the proposed developments will be required to make contributions to this scheme.

The A6MARR is also under construction immediately to the north of Poynton. CEC has also addressed noise and air pollution issues raised by these new road schemes and developments, and the proposed developments will have their own detailed Transport Assessments.

263. There are some local concerns about the cumulative impact of proposed developments, not only at Poynton, but also at the nearby Woodford Aerodrome. However, I understand that the availability and capacity of local services and facilities has been assessed, through discussions with the relevant service providers, including health and education; for Cheshire East, the additional facilities needed are identified in the IDPU. In response to local concerns about recent flash-flooding in Poynton, CEC has received assurances from the EA and other relevant bodies that, with appropriate mitigation, the developments should not exacerbate, and may improve the situation. Further detailed flood risk assessments will be undertaken, where needed, at the planning application stage.

264. Some parties argue that the proposals in the CELPS-PC are contrary to the emerging Poynton Neighbourhood Plan. However, this plan is at a relatively early stage in the plan-making process, having only recently been published for consultation, and has not yet been subject to examination; consequently, it can have little weight in considering longer-term strategic proposals for future development, particularly when it is for the CELPS to identify most of the sites for development and provide the strategic context for the Neighbourhood Plan.

265. In general terms, I therefore consider that the development strategy and amount of development proposed for Poynton is appropriate, justified, deliverable, effective and soundly based. The main outstanding issues relate to the suitability and deliverability of the proposed site allocations, including the loss of Green Belt.

266. Land adjacent to *Hazelbadge Road* (CS57) lies on the north-western fringe of the town and is proposed for 150 new homes. Although currently in the Green Belt, it makes a limited contribution to Green Belt purposes and is reasonably well-contained and well related to the existing town and local facilities, including the adjacent railway station. The prospective developers have prepared a masterplan and confirmed the availability, viability and deliverability of the proposal. CEC has addressed site-specific issues, including the availability of education, health and other facilities, flooding, Poynton Brook, biodiversity and land contamination. In response to local concerns about the impact on local roads, including traffic and access to the site and to the adjoining school, both CEC and the prospective developer confirm that a safe and suitable access can be provided and, with appropriate mitigation, the extra traffic can be accommodated on the local road network; concerns about the detailed layout of the site, including addressing detailed flooding concerns, would be considered at the planning application stage. CEC proposes some amendments to the proposal, to clarify the amount of development and access improvements required, and address flood mitigation measures relating to Poynton Brook **[MM73]**. With these modifications, the proposal would fully address relevant site-specific issues and constraints, ensure consistency and clarity, and be justified, effective and deliverable.

267. *Sprink Farm* (CS58) lies on the south-eastern fringe of the town and is proposed for some 150 new homes. It is currently in the Green Belt, but makes a limited contribution to Green Belt purposes and is reasonably well-contained and well related to the existing town and local facilities. The landowners confirm that the site is available, sustainable, viable and deliverable. CEC has addressed relevant site-specific issues, including the availability of education, health and other

facilities, flooding, Poynton Brook, drainage, biodiversity and landscape. CEC also confirms that a safe and suitable access can be provided to the site without adversely affecting the local road network. Concerns about the detailed layout of the site, including addressing outstanding flooding, access and traffic issues, would be considered at the planning application stage. However, some amendments are needed to address flood mitigation measures relating to Poynton Brook **[MM74]**. With these modifications, the proposal would fully address relevant site-specific issues and constraints, ensure consistency and clarity, and be justified, effective and deliverable.

268. *Land south of Chester Road* (CS59) lies on the western fringe of the town, close to the PRR and Woodford Aerodrome, and is allocated for 150 new homes. Currently lying in the Green Belt, it makes a limited contribution to Green Belt purposes and will be well-contained by the new PRR, when built; confining development to the east of the adjacent access track would also limit the risk of coalescence and urban sprawl. The prospective developers support the proposal and confirm viability and delivery in line with the housing trajectory. CEC confirms that a safe and suitable access can be provided to the site, and has addressed other site-specific issues, including the capacity of existing local services and facilities, drainage, impact on biodiversity, woodland and landscape, and traffic; concerns about the detailed layout and phasing of the site would be considered at the planning application stage. Apart from clarifying the amount of new housing **[MM75]**, for consistency and clarity, no further amendments are needed to this proposal.

269. Four areas of new employment land (10ha) are proposed at *Adlington Business Park* (CS60). Although currently in the Green Belt, making a significant contribution to its purposes, they are well-related to the existing business park and would be well-contained by the new PRR when completed. Developers are keen to develop these areas, with a planning application already submitted for part of the site. CEC has addressed site-specific issues, including traffic, access, heritage, groundwater, flood risk, pedestrian/cycle links, impact on the wider Green Belt, listed buildings and existing employment uses, and the implications of the PRR. However, some amendments to the proposal are needed, to clarify the amount of employment development, refer to the need for a Heritage Impact Assessment, address the need for future pedestrian/cycle links and delete reference to open space provision **[MM76]**, so that it is justified, effective and deliverable.

270. *Land at Woodford Aerodrome* (CS65), immediately to the north of Adlington Business Park is proposed as Safeguarded Land (22ha). It currently lies in the Green Belt and makes a significant contribution to its purposes, but was formerly occupied by a runway and would be well-contained by the new PRR and a well-defined northern boundary, retaining the gap between Poynton and Woodford. Its allocation would help to meet the identified overall need for Safeguarded Land. CEC has considered the possibility of releasing this site for development at this time, but it is not needed to meet currently identified needs and would only be released for development if it is found necessary in a future review of the CELPS. CEC has addressed the relationship of this area to the rest of Woodford Aerodrome, and SMBC raises no issues about this proposal, which is justified and positively prepared. I understand that proposals for further development at Woodford Aerodrome and elsewhere in Stockport are included in the draft Greater Manchester Spatial Framework. However, this is only an initial consultation draft and the final submission version may change, so it can have very little influence on my conclusions on the soundness of the development strategy for Poynton at this stage. No further amendments are needed to this proposal for soundness.

271. Consequently, with the recommended modifications **[MM72-76]**, the development strategy and proposed site allocations for Poynton are appropriate, justified, positively prepared, effective, deliverable, sustainable, viable and soundly-based.

Sandbach

272. Sandbach is a market town in the centre of the Borough, immediately next to the M6 motorway (J17) and designated as a Key Service Centre. The development strategy for the town seeks to provide a new high-quality mixed-use employment-led development on land adjoining the M6, with good access to the strategic road network, to offset the recent loss of industry and high levels of out-commuting, diversify the town's economy and attract new jobs. The CELPS-PC allocates 2,750 new homes, over 90% of which is now completed or committed, along with 20ha of new employment land to Sandbach.

273. CEC has assessed the potential impact of the revised scale of development on the existing and future road network [PC/B022], including discussions with Highways England about the M6 (J17) and with the Highway Authority about the A533/A534 junctions/corridor and air quality issues. The updated Sandbach VISSIM transport model has now been published [RH/D024]; this assessed all committed and proposed sites in and around Sandbach, indicating that these may increase traffic delays and congestion on the M6 (J17) and A533/A534 corridors. Although some sensitive areas would remain, the improvements included in the IDPU and other identified mitigation measures would mitigate these impacts. Some parties raise concerns about the validation and assumptions about committed and projected traffic and traffic growth, but I am satisfied that VISSIM model adequately assesses these matters and identifies the mitigation measures needed. Further transport assessments would be undertaken at the planning application stage.

274. Some participants consider the town should be allocated more new housing, to provide a better balance with the amount of employment land and more choice of housing sites. However, this fails to reflect the significant amount of new housing recently built or committed at Sandbach (2,520 dw) and the fact that the proposed allocation fully meets the apportionment, with 8% flexibility; further housing would inevitably involve more greenfield land, which could put pressure on an already constrained road network and is not needed to meet currently identified housing needs. Consequently, in general terms, the development strategy and amount of development for Sandbach is appropriate, justified, effective, deliverable and soundly based. The main outstanding issues relate to the mix of uses, viability and deliverability of the proposed development on land adjoining the M6 (CS24).

275. *Capricorn Park* (CS24) was originally proposed as a science park in the 1980's, but no development took place at that time. CEC has reviewed the mix of development proposed, recognising that some new housing will be needed to provide the access and infrastructure improvements required to deliver the whole site, and has increased the amount of housing from 200-450 dw. Some of this strategic employment site is already being used for new housing, including 420 dw now being built or committed on separate parts of the site; most of the rest is proposed for employment uses, a wildlife area and planting belts, with permission already granted for commercial development on the northern part of the site. However, the landowners argue that the provision of 20ha of employment land is not viable, and should be replaced with a flexible mixed-use proposal for the remaining part of the site with 8ha of employment land and up to 150 new houses, totalling some 10ha of employment land and 600 new houses for the overall site.

276. CEC's plan-wide viability assessment [BE/042] examined this site, considering various options, and concluded that the development proposals were viable. More recently, the landowners submitted a critique of this work, and whilst such detailed evidence is not usually needed for a strategic allocation, it does highlight some key issues, including commercial developer's profit and abnormal costs. Having considered these detailed appraisals, I share CEC's view and reasons that the landowner's estimate of the level of developers profit is relatively high. Moreover, I cannot see that the provision of site-specific infrastructure such as a spine road, access and drainage should be considered as "abnormal" costs, since they would be needed for most larger-scale developments. In saying this, I understand that £2.78m of contributions to the new bridge, access and road improvements have already been made by the adjoining housing developers; there is also some double counting and incorrectly attributed costs in the landowners' appraisal. On the evidence before me, I can find nothing to conclusively demonstrate that there is no reasonable prospect that CEC's latest proposals would be viable or deliverable.

277. CEC has also addressed other site-specific issues, including the implications of additional traffic and the delivery of the required road improvements, including access and the motorway junction. I therefore consider the proposed mix, viability and deliverability of land-uses of the proposed development is effective, justified and soundly based. In the accompanying text, CEC proposes to confirm that supporting residential development will be needed to enable access and infrastructure improvements to deliver the whole site and include a reference to the Sandbach Neighbourhood Plan **[MM77]**; with this modification, the proposal would be fully justified and effective.

278. Some consider that new housing at the former Albion Chemical Works (Albion Lock) should be included in the housing figures for the rural area, rather than for Sandbach. However, this site is being marketed as within the Sandbach housing market and is closely related to the town, where most services and facilities are located, just a few minutes away. As a site for over 370 dw, helping to meet the housing needs of Sandbach, this is not the type of development which would normally be expected in a rural area. It is therefore properly accounted for as more closely related to the urban area of Sandbach than to the rural area.

279. I understand that the Sandbach Neighbourhood Plan was formally made in April 2016. However, this plan was drawn up to be in conformity with the CBLP, rather than the CELPS, and it will be for CEC to decide on the weight to be given to this plan when determining planning applications. Since the CELPS determines the strategic context, it cannot influence the strategic decisions made in the CELPS.

280. Consequently, with the recommended modification **[MM77]**, the development strategy and proposed site allocation for Sandbach are appropriate, justified, effective, deliverable, sustainable, viable and soundly-based.

Wilmslow

281. Wilmslow is the fourth largest town in Cheshire East, in a sustainable location in the north of the Borough, between Handforth and Alderley Edge, with good access to the strategic transport network, local facilities and jobs. The development strategy for the town seeks to accommodate a modest level of new housing and employment growth, reflecting its size and function as a Key Service Centre, as well as its popularity as a residential location and its ability to attract investment and jobs, whilst minimising harm to the Green Belt. The town does not have many potential brownfield sites and is tightly constrained by the Green Belt; the

proposed amount of development is therefore less than proportionate to its size and population, but somewhat more than in the original CELPS-SD, in order to support economic growth and address issues of housing affordability. The CELPS-PC allocates 900 new homes and 10ha of new employment land to Wilmslow, seeking to fully meet the proposed apportionment, with a flexibility of almost 6% for new housing. However, the Wilmslow Town Map needs amending, to reflect detailed changes in site boundaries **[MM78]**.

282. CEC has assessed the potential impact of the revised scale of development on the existing road network [PC/B022; PS/E036], with specific schemes set out in the IDPU; more detailed work is ongoing on cross-boundary traffic flows and the impact of the SEMMMS/A6MARR, and further Transport Assessments will be undertaken at the planning application stage. CEC acknowledges that the amount of proposed development would not fully meet the needs arising from Wilmslow, but points out that the NCGV, located some 2km away, would also help to meet local needs. Further smaller development sites may be identified in the SADPDPD, and Wilmslow is also within easy reach of housing and job opportunities in Greater Manchester. Some question whether CEC has properly accounted for all the recent completions and windfall sites within Wilmslow's urban area, but I am satisfied that these have been correctly recorded and any missing or future completions will be included in the overall housing figures as part of the monitoring process.

283. Some participants question whether the "Waters" business park should count towards Wilmslow's employment allocation. However, this is existing employment land which was previously allocated in the MBLP as a "Major Developed Site in the Green Belt" and used for employment, so it cannot count towards the allocation of "new" employment land. Similarly, existing vacant offices in the town cannot count towards the supply of "new" employment land. Consequently, the development strategy and proposed amount of development allocated to Wilmslow is appropriate, justified, effective, deliverable and soundly based. The main outstanding issues relate to the location, mix and impact of land uses, loss of Green Belt, and the delivery/viability of the proposed site allocations.

284. The *Royal London* site (CS25) is currently partly occupied by the Royal London offices, and is allocated for some 175 new homes and 5ha of employment land, along with open space and playing fields; in the CELPS-PC, the site has been extended to encompass land on the western side of Alderley Road. Although the site currently makes a significant contribution to Green Belt purposes, it is in a highly sustainable and accessible location, close to the town centre and bounded by the main railway line and A34 by-pass. CEC has demonstrated the exceptional circumstances necessary to justify releasing land from the Green Belt, both generally and more locally, due to the lack of other alternative sites in Wilmslow. It provides the opportunity not only for the expansion of an existing employment enterprise, but also to provide further open space, recreational facilities and some new housing. Part of the site already has planning permission for further office development, and proposals for the housing areas are likely to come forward shortly; prospective developers have already drawn up a masterplan and have confirmed viability and delivery.

285. CEC has addressed issues about the amount, layout, mix and phasing of housing, employment and other uses, along with the impact on existing employment, education and recreation uses and on the Fulshaw Park housing area; issues relating to flood risk, sewers, Green Belt, traffic and heritage assets, along with the availability of existing facilities, such as health and schools, have also been addressed. The detailed layout and extent of land-uses, including land around

Harefield Farm, can be considered further at the planning application stage. There is some concern about the impact of the proposal on the tree-lined entrance to Wilmslow, particularly on the western side of Alderley Road, but these issues are addressed in the principles of development. CEC proposes amendments to address the possibility of redeveloping the existing buildings, the location of playing fields to the east of the existing campus, phasing and updating of the proposed development, and the need to protect the landscape setting of the existing campus, provide open space on the western part of the site and have regard to the Fulshaw Park SPG **[MM79]**. With these amendments, the proposal would be justified, effective, up-to-date, deliverable and soundly based.

286. *Wilmslow Business Park* (CS27) would make effective use of land between the Royal London site and the main A34 by-pass for new employment development (6.3ha). It currently makes a significant contribution to Green Belt purposes, but is in a sustainable location, well contained by the A34 by-pass. CEC has demonstrated the exceptional circumstances necessary to justify releasing land from the Green Belt, both generally and more locally, due to the lack of other alternative sites in Wilmslow. CEC has also addressed relevant site-specific issues, including loss of Green Belt, the amount of proposed employment development, traffic issues and the potential impact on ecological assets and the existing playing fields. Access arrangements off the main A34 have been confirmed and no further amendments are needed to this proposal in the interests of soundness.

287. The CELPS-PC allocates two new Green Belt sites on the fringes of Wilmslow for new housing. 200 new homes are proposed at *Little Stanneylands* (CS61), in a sustainable and accessible location on the north-western edge of the town. The site currently makes a significant contribution to Green Belt purposes, but is well contained by the River Dean and woodland, and the proposed Protected Open Space would help to safeguard the remaining Green Belt between Wilmslow and Handforth. CEC has also demonstrated the exceptional circumstances to justify releasing this Green Belt site. Developers confirm that the development is viable and deliverable in line with the housing trajectory. In response to local concerns about the impact on the local highway network, CEC confirms that the site can be accessed safely from Stanneylands Road, with suitable mitigation measures and without having an unacceptable impact on local roads, and has addressed the impact on the River Dean, existing facilities, and ecological issues. CEC proposes to clarify the status of the open space along the Dean Valley **[MM80]**, and with this modification, the proposal would be justified, effective and soundly based.

288. *Heathfield Farm* (CS62) is in a sustainable and accessible location on the eastern edge of the town, and proposed for some 150 new homes. The site is well contained and makes only a limited contribution to the purposes of the Green Belt. The prospective developers have confirmed that the site has sufficient capacity to accommodate the amount of housing, along with viability and delivery. CEC has demonstrated the exceptional circumstances justifying the release of this Green Belt site, along with highways, traffic and accessibility issues, existing facilities and the impact on ecological assets and the adjoining Green Belt. An adjoining 9ha of Safeguarded Land is also identified at Heathfield Farm (CS63); this land is not needed to meet currently identified housing needs, but offers the potential to accommodate a further phase of the development, if justified by a future review of the CELPS. CEC proposes to make a slight change to the boundary of the proposed site (CS62), to accommodate the alignment of the proposed access **[MM81-82]**, and with this amendment, the proposal would be justified, effective and soundly based.

289. Land at *Upcast Lane/Cumber Lane* (CS36) is identified as Safeguarded Land (15ha). This site currently makes a limited contribution to Green Belt purposes, and CEC has demonstrated the exceptional circumstances justifying the release of this site from the Green Belt, including the possibility of allocating it now for new housing. There are some concerns about access to the site, particularly using the existing road network, and the potential impact on the surrounding landscape, which is of local importance due to the historic field patterns. However, the CELSP-PC does not allocate this land for development at this time; these detailed matters could be considered in the future, if the site were to be released for development as a result of a future review of the CELPS. No further amendments are needed to this proposal.

290. An area of land at *Prestbury Road* (CS35), previously identified as Safeguarded Land in the CELSP-SD, has now been deleted, due to concerns about the weak outer boundary of the site and its impact on the wider landscape and Green Belt. A housing site previously proposed at *Adlington Road* (CS25) is now under construction and no longer needs to be allocated, as confirmed in the CELPS-PC.

291. Consequently, with the recommended modifications **[MM78-82]**, the development strategy and proposed site allocations for Wilmslow are appropriate, justified, effective, deliverable, sustainable, viable and soundly-based.

Other settlements and rural areas

292. I have dealt with issues about the overall scale of housing and employment land allocated to Local Service Centres (LSC) and other settlements in the rural area under Policy PG6, earlier in my report, and I deal with specific sites outside the main settlements below. Apart from these sites, the CELPS makes no specific site allocations at the LSCs and other rural settlements, but the possibility of identifying some smaller sites will be considered in the forthcoming SADPDPD and Neighbourhood Plans.

Other sites

293. The CELPS-PC identifies three other sites for development or Safeguarded Land. *Wardle Employment Improvement Area* (CS28) lies in the countryside along the main A51 to the north-west of Nantwich. It is an established employment location based on a former RAF airfield, which offers the opportunity to expand on to the adjoining greenfield site. This reflects the outline planning permission which has now been granted for employment uses here. This is a large 61ha (gross) site which would incorporate landscaping and other green infrastructure. There may be some issues about phasing, viability and initial infrastructure, including a new roundabout, but the developers are discussing funding with the LEP, are keen to implement the proposal and confirm their intention to deliver the entire site by 2030 [RH/C028]. CEC has assessed the proposal through the site-selection process and has addressed site-specific issues, including the impact on existing employment uses and ecological assets. As a result, this is an effective, deliverable and soundly based allocation. Apart from clarifying the amount of employment land proposed **[MM83]**, no further modifications are needed.

294. The *Alderley Park Opportunity Site* (CS29) is an existing employment/research development constituting a "major developed site" in the Green Belt. The main occupier is scaling down its research facility, which provides the opportunity to consider other uses. The proposal for 200-300 new homes and a life science park is soundly based, supported by evidence, specific planning permissions and a Development Framework. Developers confirm that the proposal is sustainable,

deliverable and viable and are already implementing the first phases, now within a designated Enterprise Zone [PCM/M5.13.006; RH/B002.005]. CEC has justified the very special circumstances needed for further development on this Green Belt site and has also addressed other site-specific issues, including the amount, extent and range of research & development, housing and other uses and the impact on existing employment uses and ecological/heritage assets. CEC puts forward some amendments to the explanatory text, referring to the Biohub incubator and amending the extent of previously developed land **[MM84]**, which are needed for clarification, accuracy, and effectiveness.

295. The CELPS-PC identifies the *Cheshire Gateway* site (CS64) as Safeguarded Land, in addition to the overall amount of Safeguarded Land recommended in the submitted evidence [PS/E031a.5]. However, in the light of further representations and after reconsidering the position, CEC has decided to delete this proposal and retain this site within the Green Belt [PC/B009]. This site lies close to the northern boundary of the Borough and currently makes a limited contribution to Green Belt purposes. Although it lies within the general area of the North Cheshire Science Corridor, it comprises an isolated, stand-alone "island" of land bounded by the gyratory junction linking the A556/A56 with the M56. It does not lie between the urban area and the Green Belt, and so would not meet the spatial criteria for Safeguarded Land set out in the NPPF (¶ 85). Both CEC and the National Trust are also concerned about the impact of any future development on the landscape and setting of Dunham Massey House, supported by evidence from both parties. Other detailed evidence and critiques have been submitted, but the impact of development on landscape and heritage assets can only be assessed properly when detailed schemes are put forward; this site is not currently proposed for development and no detailed proposals have been submitted.

296. Since the site fails to meet the key spatial requirement set out in national policy and the CELPS-PC makes provision for sufficient Safeguarded Land to meet the need for longer-term development, I consider that it should remain in the Green Belt, as in the submitted Plan. Furthermore, any future proposal to use this site for science/ research/advanced manufacturing, or to use the larger site to the west for logistics development, would fall within the category of "omission" sites, which are not currently required and do not need to be allocated at this time. In any event, the CELPS already makes provision for growth in the science/research/ technology sector, such as at Alderley Park & Booths Hall Strategic Employment Area, reflecting its planning consent. Consequently, there is no need for a specific policy or compelling justification for allocating or safeguarding this site for such purposes and, as I have said previously, there is no compelling legal or other statutory requirement for the CELPS to be reviewed or for this site to be released from the Green Belt due to the designation of the Alderley Park EZ.

297. I recognise that there may be some support for this proposal from business/ healthcare companies, but several local organisations and residents are opposed to this designation and Trafford Council does not fully support it. I also understand that the GMSF proposes to meet all of Greater Manchester's business and employment needs within the Greater Manchester area. Given the extent of consultation on the examination documents and statements, there are no issues of procedural irregularity or unfairness. Having considered all the evidence and representations about this site, including the further representations submitted at Main Modifications stage, I consider there are no exceptional circumstances or compelling reasons to justify designating this site as Safeguarded Land at this time and recommend the specific modification **[MM85]** confirming this position.

Omission sites

298. In the representations and during the course of the examination, over 70 potential additional/alternative "omission" sites were put forward by developers, landowners and others. These range from sites for 150 dwellings to much larger sites promoted for a mix of land uses, in one case for up to 4,000 dwellings. Almost all of these are greenfield sites, many currently within the Green Belt. Some sites are below the 150-dwelling threshold set for strategic sites in the CELPS, and many others are poorly related to the existing settlement pattern. CEC has assessed all these sites in its site-selection work, in a comprehensive, consistent and transparent way, with clear reasons for their rejection. Several participants question some of the assessments, and CEC has updated the information in several cases. Having reviewed all the detailed assessments and evidence about these sites, I consider none perform markedly better than CEC's selected sites. Consequently, I find no compelling or conclusive reasons why any of these sites should be allocated at this time, particularly since currently identified development requirements can be met by the strategic site allocations proposed in the CELPS-PC and subsequent smaller sites identified subsequently in the SADPDPD.

Other matters

299. Other matters were raised in the representations and at the hearings which do not go to the heart of the soundness of the CELPS or relate to more detailed matters about specific proposals or planning applications. In response, CEC proposes some minor changes to the wording of the policies and accompanying text as "Additional Modifications", but these do not directly affect the overall soundness of the Plan and need no endorsement from me. I have considered all these matters, along with the other points made in the representations and at the hearing sessions, including those relating to the Main Modifications. However, I conclude that there are no further changes needed to ensure that the Plan is legally compliant and sound in terms of the NPPF and associated guidance.

Overall Conclusion and Recommendation

300. Both the submitted and revised versions of the CELPS (CELPS-SD & CELPS-PC) have a number of deficiencies in relation to soundness for the reasons set out above, which mean that I recommend that the Cheshire East Local Plan Strategy is not adopted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

301. The Council has requested me to recommend Main Modifications to make the Plan sound and legally compliant and capable of adoption. I conclude that with the recommended Main Modifications set out in the attached Annex, the Cheshire East Local Plan Strategy satisfies the requirements of Section 20(5) of the 2004 Act, meets the criteria for soundness in the National Planning Policy Framework, and is capable of adoption.

Stephen J Pratt

Inspector

Appendix 1: Inspector's Interim Views and clarification (06 & 28.11.14) [PS/A017b; PS/A018]
Appendix 2: Inspector's Further Interim Views (11.12.15) [RE/A021]
Annexe: Main Modifications required to make the plan sound and capable of adoption