



The countryside charity
Cheshire

Victoria Buildings
Lewin Street
Middlewich
Cheshire CW10 9AT

Tel/fax: 01606 835046
info@cprecheshire.org.uk
www.cprecheshire.org.uk

*Working locally and
nationally for a beautiful
and living countryside*

Cheshire East Council
Spatial Planning Team
Westfields C/O
Municipal Buildings
Earle Street
Crewe CW1 2BJ
By Email: localplan@cheshireeast.gov.uk

16th December 2020

Dear Spatial Planning Team,

Cheshire East Council's second consultation on its Local Plan, Part 2, the Revised Publication Draft Site Allocations and Development Policies Document

1. The Cheshire Branch of the Campaign to Protect Rural England (CPRE Cheshire) is pleased to respond to Cheshire East Council's consultation on its Revised Publication Draft Site Allocations and Development Policies Document (SADPD), September 2020.

CPRE and the climate emergency

2. CPRE is the countryside charity. We believe in a countryside and green spaces that are accessible to all, rich in nature and playing a crucial role in responding to the climate emergency. We have a vision of a low carbon countryside, one in which wildlife is abundant, that provides good jobs and services, is affordable and accessible to all, full of tranquillity and beautiful landscapes for us to enjoy. Based on the scientific evidence, we believe climate change will have serious impacts on the rural environment and local plan policies must address this important environmental issue.

Cheshire East Council's role in tackling the climate emergency

3. Cheshire is largely a low-lying part of the country which has known its share of flooding incidents and is therefore particularly under threat from climate change. CPRE welcomes the fact that Cheshire East Council declared a climate emergency in May last year and we welcome the fact that the Local Plan contains climate change and natural environment policies – but we would urge Cheshire East Council (CEC) to make them and the other policies in the SADPD more responsive to the rapidly changing environmental, economic and health scenarios surrounding it. The importance of local green space for mental health became a particularly prominent issue during the recent 'lockdown' periods due to the coronavirus pandemic.

The consultation document

4. This SADPD is a second attempt at the second part of CEC's Local Plan and although it refers to 'non-strategic' sites (sites of less than 150 dwellings or five hectares in size) it will be important in determining how greenfield land is both directly and indirectly impacted by development in the local authority area in the future. Our hope is that an amended, more sound, local plan will be adopted which will focus on regenerating brownfield areas and pay due heed to environmental capacity. Our concern is that CEC have failed to adapt to changed circumstances and are over-reliant on land that came forward through the 'Call for Sites' exercise, much of which is unsustainable. And we query why CEC's Environment Strategy of May this year is not one of the SADPD evidence documents.

National Planning Policy Framework

5. CPRE acknowledges that the government requires Local Authorities to plan for a sufficient amount and variety of land to come forward to meet housing projections and especially we support the need to provide dwellings that are affordable and which provide for those with specific needs. And we are cognisant of criteria in the National Planning Policy Framework (as revised 2019) *Section 5: Delivering a sufficient supply of homes* and the housing tests.
6. That recognised, we urge Cheshire East Council to fully assess its performance to date and, importantly, to give due regard to other, no less important, sections of the NPPF such as: *11. Making effective use of land, 13. Protecting Green Belt land, 14. Meeting the challenge of climate change, flooding and coastal change, 15. Conserving and enhancing the natural environment, 16. Conserving and enhancing the historic environment and 17. Facilitating the sustainable use of minerals*. Data released with this SADPD consultation showed that Cheshire East Council's (CEC's) housing supply is being met by an unprecedented building programme, significant parts of it on Green Belt released in Part 1 of the Local Plan, the Local Plan Strategy (LPS). This raises the question as to whether exceptional circumstances have been proved to release further Green Belt land. We maintain they have not been.
7. If the Council is not balanced in the way it plans for the future, greenfield land, in open countryside, including that currently designated as Green Belt, will be needlessly promoted for development, in advance of reutilising wasted brownfield sites. CEC must do all it can to identify suitable sites for inclusion on the Brownfield Register, to protect greenfield land.

Brownfield Land

8. The Authority's 2018/19 Annual Monitoring Report revealed that only 34% of new and converted dwellings had been provided on previously developed land (as opposed to the 60% brownfield targets achieved during the time of the North West Regional Spatial Strategy). In the interests of sustainability, previously used and underused land should be re-purposed in advance of greenfield development. This could include parts of failing town centres where it might be feasible to redesignate some retail and commercial areas for housing. Covid-19, coming on top of the growth in internet shopping, has seriously impacted town centres that now need re-evaluating. This point has not escaped the government who, at the time this submission was being written, were re-working their housing algorithm accordingly and consulting on new town centre permitted development rights that would allow change of use from commercial, business and services (the new Class E) to residential use (C3).

Housing supply situation

9. Today the Government announced the new standard method for calculating the housing requirement. The Council will need to ensure the housing policies are up to date.
10. Table 2 of evidence document ED05 on the Provision of Housing & Employment Land & the Approach to Spatial Distribution reveals how successful CEC has been in delivery terms:

Housing and Supply at March 31 2020	Net dwellings
Completions 01/04/10 – 31/3/20	15,683
Supply (planning permissions and allocated sites)	24,437
Small sites windfalls allowance for remaining plan period	875
Contribution to be made through SADPD	<u>275</u>
	41,270

11. Para. 3.75 of ED05 summarises: *“Supply at the 31 March 2020 is 41,270 dwellings including the contribution to be made from sites allocated in the SADPD (275 dwellings) or 40,995 without. Of this supply, 15,683 dwellings have been completed. In the 4 year period between 1 April 2016 and 31 March 2020, 10,210 homes have been completed in the borough, nearly twice the number completed in the first six years of the Plan period”.*
12. Bearing in mind that CEC’s housing requirement in the LPS was 36,000, the fact of the matter is that this figure is already more than accounted for. ED05 refers to a ‘flexibility allowance’ of 9.9%. As the figures already indicate a ‘flexibility allowance’ of 14.6%, it is difficult to see where the case exists for more housing to be allocated through the SADPD.
13. The Authority’s Monitoring Report of 2018/19 reveals the percentage of empty homes rose to 2.5%, representing some 4,322 dwellings (para. 12.10) in October 2018 and data from the Ministry of Housing, Communities & Local Government shows this rose to 4,635 in October 2019 (<https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>, Table 615). This must not be overlooked when calculating housing need.
14. The amount of land to be identified for development must be in line with the capacity of the area in terms of economic, social and environmental factors, to ensure that there is adequate infrastructure to support the additional growth in population. Otherwise the development will not be sustainable and will have long term problems, such as traffic congestion and localised flooding.
15. Whilst it is accepted that the over-arching figure of 36,000 houses in the LPS was not a ceiling figure, not to limit development to somewhere close to that figure would be irresponsible and at odds with climate change commitments and environmental policies.

Affordable Homes

16. The Annual Monitoring Report for 2018/19 (the 2019/20 one is not expected until February or March 2021) revealed that the gross total of affordable homes stood at only 729 (<https://www.cheshireeast.gov.uk/pdf/planning/spatial-planning/cheshire-east-local-plan-authority->

[monitoring-report-2018-19.pdf](#), Table 1.5, Stronger Communities Summary). CPRE would like to see a higher percentage of affordable homes but not more homes per se because it does not believe the case has been proven for a higher overall number.

POLICIES

PLANNING FOR GROWTH

Policy PG 8 Spatial Distribution

17. CPRE Cheshire did not support this policy in the first iteration of the SADPD because the policy was demanding allocations of housing (and therefore the land required to build them) which were not necessary to meet the full objectively assessed housing need. Cheshire East's own housing figures, released along with that consultation, clearly showed that the local authority was on course to deliver its housing numbers within the Local Service Centres (LSCs) without further allocations. Three years on and the updated housebuilding figures reveal that it is still on course. CPRE, therefore, welcomes CEC's decision to drop the housing allocations list for the 13 LSCs and to rely on windfalls for the remainder. However, the supporting paragraph 2.4 to this policy states CEC's intention to proceed with seven ha. of employment land, as well as the 3,500 new homes, in the LSCs and *"in the order of 69 ha. of employment land and 2,950 new homes"* for other settlements and rural areas. This gives us cause for concern because it implies that CEC has not reassessed need and spatial distribution in the light of current economic circumstances.
18. Allocating more land than is needed for development has consequences as Cheshire East itself acknowledges in the introductory paragraph to the chapter 'Planning for Growth'. It says: *"Achieving the right balance of development in rural areas is a particular challenge; providing too much risks adversely affecting the character of the countryside"* (para. 2.1).

Policy PG 11 Green Belt boundaries

19. CPRE Cheshire objected to this policy when responding to the last iteration of the SADPD, maintaining that the arguments put forward to justify Green Belt release did not stand up to scrutiny. We therefore welcome the removal of this policy and the dropping of intentions to remove any further Green Belt for development purposes during the course of this Local Plan (ie. prior to 2030).

Policy PG 12 Green Belt and safeguarded land boundaries

20. This policy is not sound. It is proposing the removal of eight Green Belt parcels of land from five LSCs, to be 'safeguarded' for development in the course of the next Local Plan (after 2030). It is doing this despite not having published any up-to-date evidence to demonstrate that 'exceptional circumstances' apply and despite the fact that there is no obligation on the local authority to find safeguarded land in the LSCs.
21. The Local Plan Strategy (LPS) endorsed in 2017 says that further Green Belt/safeguarded land would only be removed from the Green Belt around LSCs if necessary. Policies PG3 and PG4 say: *"In addition to these areas of [green belt/safeguarded] land listed it may also be necessary to identify additional non-strategic areas of land to be safeguarded in the Site Allocations and Development Plan Document"*. The key word here being 'may'. The primary supporting evidence document for this policy is ED53, the

Local Service Centres Safeguarded Land Distribution Report which, as pointed out previously, merely deals with distribution.

Local Service Centres Safeguarded Land Distribution Report (ED53)

22. It is important to stress that this report does not consider the need for safeguarded land – merely the spatial distribution of it. It makes no attempt to reconsider whether the safeguarded land calculations made for the LPS are still relevant or whether they should be adjusted to take into account the rate of housing delivery, lower population forecasts, an altered economic landscape, climate factors or CEC’s own 2019 Environment Strategy: <https://modern.gov.cheshireeast.gov.uk/ecminutes/documents/s76204/Environment%20Strategy%20-%20app%201.pdf>. (NB. We note that CEC aims to be carbon neutral by 2025).
23. Nor does it record any investigations to ascertain if there are ‘exceptional circumstances’ attached to the land parcels it has identified. (It is worth quoting here a parliamentary answer from a planning minister in June this year which stated that LAs must show that all other reasonable options for development have been explored (<https://questions-statements.parliament.uk/written-questions/detail/2020-06-02/53414>). Instead CEC simply accepts that it is still appropriate for the LSCs to contribute 13.6 ha. of the 200 ha of safeguarded Green Belt referenced in the LPS. This, despite the inspector at the LPS examination in public having made it clear he expected to see ‘special circumstances’, proved if any further Green Belt were taken. He said: *“I also understand the SADPD 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 ... CEC also confirms that the SADPD 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”*. (ED53, para. 1.24).
24. Paragraph 1.25 in ED53 goes on to quote the NPPF: *“As set out in the NPPF (para. 136), Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified the preparation or updating of plan”*.
25. It would seem that CEC are relying on this catch-all statement quoted in ED53, para. 1.20:

“the importance of allocating land to go some way to meeting the identified development needs in the north of the borough, combined with the consequences for sustainable development of not doing so, constitutes the exceptional circumstances required to justify alteration if the existing detailed Green Belt boundaries, whilst maintaining the overall general extent of the Green Belt”... And also on this one in the settlement reports:

“The exceptional circumstances required to release this area of land from the Green Belt derive from the exceptional circumstances set out in general terms in the GBAU and confirmed through the examination of the LPS. These are the need to allocate sufficient land for market and affordable housing and employment development, combined with the significant adverse consequences of not doing so, particularly because it is not practicable to fully meet the development needs of the area without amending Green Belt boundaries. Whilst the LPS released sufficient Green Belt land to allow the overall objectively-assessed needs for market and affordable housing and employment

development to be met, there remains a requirement to identify further safeguarded land to give sufficient confidence that Green Belt boundaries will not need to be altered again at the ends of the plan period (as required by NPPF para. 139e)”.

26. This same paragraph quoted immediately above appears in the settlement reports of all five LSCs in the North Cheshire Green Belt where parcels of land are being sought for safeguarding. [Ref: para. 4.36 of the Alderley Edge report (ED21), para. 4.45 of the Bollington report (ED24), para. 4.41 of the Chelford report (ED26), para.4.49 of the Disley report (ED29) and para. 4.44 of the Prestbury report (ED40)].
27. This statement is merely an affirmation on the part of CEC. CPRE contends that, in view of the vastly changed circumstances since the LPS was adopted, there does not “remain a requirement to identify further safeguarded land”. Also, it would appear that CEC has not carried out an assessment to ascertain if it is possible to re-designate parts of failing town centres for housing – something which the government is now actively promoting.
28. In addition, CEC’s own figures show that it is meeting the housing needs which were identified in Part 1 of the Local Plan – even though these were based on inflated economic projections which have not materialised. (See paras. 9-11 inc. of this submission). Housebuilding in the Borough has boomed due to the desirability of Cheshire as a place to live, even though the predicted new jobs have failed to materialise. But the fact remains that cases of ‘need’ have not been proven and neither have ‘exceptional circumstances’ been proven for the specific eight parcels of Green Belt land proposed for safeguarding in Policy PG12 – even though none of the parcels were designated as making ‘no contribution’ to Green Belt purposes and five of the eight were given the designation of making a ‘significant contribution’ in the original GBAU report by Atkins, although one of those five has since been downgraded by CEC to only making ‘a contribution’. (See chart below). This policy is therefore not sound.

Ref	Location	Contribution to GB purpose	Size
ALD 3	Ryleys Farm, Sutton Rd, Alderley Edge	Significant contribution	2.32 ha
BOL1	Land at Henshall Rd, Bollington	Significant contribution	1.48 ha
BOL 2	Land at Greenfield Rd, Bollington	Significant contribution	0.26 ha
CFD 1	Land off Knutsford Rd, Chelford	Significant contribution	0.58 ha
CFD 2	Land east of rail station, Chelford	Significant contribution	4.53 ha
DIS 2	Land off Jacksons Edge Rd, Disley	Significant contribution	2.43 ha
PRE 2	Land south of Prestbury, Prestbury	Contribution	1.84 ha
PRE 3	Land off Heybridge Lane, Prestbury	Contribution(Downgraded by CEC from Atkins’ assessment that this land made a ‘significant contribution’)	0.94 ha

Policy PG13, Strategic green gaps boundaries

29. CPRE were disappointed that its case for creating a Green Belt all around Crewe did not receive traction during the examination into Part 1 of the Local Plan. We hope that an extended South Cheshire Green Belt will be given more consideration when this Local Plan is reviewed. That said, we

are pleased to note that the Green Gap boundaries indicated in the first draft of the SADPD have been retained and therefore we support this policy. We are also supportive of the Joint Wybunbury Parishes Neighbourhood Plan, which has been successful in introducing a Local Green Gap. And we support Weston and Basford Parish in its efforts, through its review of its Neighbourhood Plan, to introduce two Local Green Gap areas. We trust that these N.P. initiatives in respect of Green Gaps will be given due weight in the Local Plan process. We would like to see the retention of the strategic green gap between Basford East and the South Cheshire Growth Village in keeping with LPS Policy PG5 as well as with the intentions of this policy.

PG14, Local Green Gaps

30. CPRE can support this policy and the suggestion by Weston and Basford Parish Council that there should be a Local Green Gap to the south and east of the village of Weston, between the village and Newcastle Road for the reasons they argue.

GENERAL REQUIREMENTS

Policy GEN 1 Design Principles

31. This policy remains unsound as it is unaltered after its first iteration in the first SADPD as:

- it makes no demands in terms of retaining local character, only local 'quality'. There is a policy on landscape character (ENV 3) in the wider sense in the SADPD, but this policy needs to tackle character in built areas
- it lacks specificity in respect of the level of environmental design required
- it mentions 'density' in a long list of attributes in point no. 1 but seems to only view it in terms of safety needs (point no. 5), not design, and it fails to cross-reference to Policy HOU12 on Housing Density (which, in any event, needs strengthening)

Policy GEN 3 - advertisements

32. This policy is not sound because it still fails to tackle a key issue which impacts on highway safety and the countryside. We pointed out in response to the first iteration of the SADPD that the M6 runs through Cheshire East, as do some dual carriageways, and that it was the responsibility of the L.A. to ensure distracting advertisement hoardings were not erected alongside them. Our argument is that this policy should have a commitment to remove any illegal advertisements that appear alongside major roads has not been acted upon. CPRE receives many enquiries from concerned people about the harmful impacts to landscape character and highway safety from unauthorised advertising adjacent to the motorways.

NATURAL ENVIRONMENT, CLIMATE CHANGE AND RESOURCES

Policy ENV 2: Ecological Implementation

33. This policy is not sound in our opinion because, disappointingly, it has still not been amended since the first iteration of the SADPD to recognise the principle of biodiversity net gain. In response to the first iteration, we supported the stance taken by the Wildlife Trust - that the amount of biodiversity net gain for each development should be a requirement. CPRE believes that planning should support human

wellbeing as well as wildlife. The net gain system, which we are pleased to note has been debated more in recent times, contributes to nature recovery. This benefits both people and wildlife.

Policy ENV 3: Landscape Character

34. CPRE supports this policy but we would point out that some of the sites proposed for safeguarding in the LSCs would run contrary to it. For instance, according to CEC's own traffic light system, there are landscape issues with sites PRE 3, CFD2 and DIS2 which are being promoted for safeguarding. As explained in our responses to previous policies, there is no need for CEC to remove any more sites from Green Belt above and beyond those already removed in Part 1 of the Local Plan, the LPS.

Policy ENV 6: Trees, hedgerows and woodland implementation

35. This policy is not sound. In response to the first iteration of the SADPD, CPRE expressed its support for the comments of Cheshire Wildlife Trust, ie. that it was not adequate to simply say "*Appropriate buffers must be provided/ adjacent [to] ancient woodland*" (the distance needs to be stipulated) and the Woodland Trust which drew attention to the government guidance on this issue which should be followed (<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>). However, we note that there have been no improvements/amendments in the second iteration of the SADPD.

Policy ENV 7: Climate Change

36. In our response to the first iteration of the SADPD we said that Policy ENV 7 on Climate Change mitigation and adaptation was not sound because of its use of the word 'should' (twice) above the list of 12 requirements. We argued that this was not strong enough and if the requirements listed in the policy were not compulsory, they would be meaningless. However, we note that there has been no amendment in the second iteration of the SADPD. We therefore retain our objection.

37. In response to the first iteration of the SADPD, we drew attention to the call for action (in May 2019) to tackle climate change by the leader of Cheshire East Council, Cllr. Sam Corcoran and to CEC's decision to become carbon neutral by 2025. We also drew attention to the fact that the principal authority was not insisting that the new houses being built in its area are constructed to the highest environmental standards and to its continued support of road building. We note that this policy now has new wording in respect of energy efficient development, which is welcome, but nothing is said about unsustainable transport (despite transport contributing over a quarter of greenhouse gas emissions) and no support has been withdrawn from any previously approved schemes. In other words, the Council's actions continue to belie its statements in respect of climate change.

38. In June 2019 the Government introduced Statutory Instrument 1056 The Climate Change Act 2008 (2050 Target Amendment) Order 2019. The Council has a legal duty to comply with this and the local plan should ensure policies and allocations that are sound when read against this. Other Councils are making good progress against climate change goals. Please see the work of Lancaster City Council in this regard.

Policy ENV 12: Air Quality

39. This policy is not sound. It is superficial and does not do justice to a hugely important subject matter that is associated with climate change and with public health. It is based on what CEC itself describes as “a high level strategy”, its 2018 strategy document, which is largely generic (<https://www.cheshireeast.gov.uk/pdf/environment/air-quality/air-quality-action-plan-2018-2023.pdf>).

POLICY EMP 2

40. CPRE believes that this policy lacks soundness because of its lack of flexibility. Whilst it does say “Other ancillary uses may also be permitted on these sites”, it goes on to say: “where they are compatible with the employment use of the site and are delivered as part of a comprehensive employment scheme”. This policy was written before the coronavirus pandemic, although the beginning of an economic downturn was already becoming evident when the CEC Authority Monitoring Report for 2018/2019 was published earlier this year (<https://www.cheshireeast.gov.uk/pdf/planning/spatial-planning/cheshire-east-local-plan-authority-monitoring-report-2018-19.pdf>).
41. Subsequently, the challenging economic situation has become more apparent from various official statistical reports such as the ONS one on the labour market published in November which showed that there were over 10,000 claimants looking for work in Cheshire East in October 2020 compared to over 4,000 in October 2019 (<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/regionallabourmarket/latest>). Consequently, the policy should now be amended to allow for parts of employment sites, where appropriate, to be given over to housing. They could be separated from each other with a combination of hard and soft landscaping. This would be greatly preferable to sequestering any more Green Belt.
42. That said, we note that two of the sites identified under this policy, EMP 2.7 (New Farm, Middlewich) and EMP 2.9 (Land at British Salt, Middlewich), trigger the impact risk zone for the Site of Special Scientific Interest at Sandbach Flashes. We are therefore pleased to note any planning applications must provide impact assessments.
43. The Council should be alert to the Greater Manchester Spatial Framework, which seeks a laudable brownfield first approach. Although Stockport has (at the time of writing) due to concerns over Green Belt release and considerable local opposition failed to approve it, CPRE does hope the area is covered by an adopted GMSF sooner rather than later to stop speculative development of countryside, including land in the Green Belt.

HOUSING

Policy HOU5a: Gypsy and Traveller site provision

44. CPRE cannot support the allocation of site G & T5 (Cledford Hall, Cledford Lane, Middlewich), which is assigned for 10 pitches, due to its proximity to industrial sites.

Policy HOU12: Housing density

45. CPRE can support the altered wording in 3(ii) of this policy, which recognises that there are areas of the Borough which have an established low density and that it is appropriate to retain them in order to protect the character of those areas. However, we note that the supporting information fails to expand on this point and leaves it open to debate as to what constitutes 'low density'. This is not satisfactory, especially as Policy HOU13 (Housing delivery) states: *"The Council supports the use of masterplans, design codes and area wide design assessments"*.
46. Ideally, there should be descriptions and maps/assessments of designated low density areas in order to remove the likelihood of developer challenges. (Reference the last Local Plan produced by Macclesfield Borough Council in 2004, which included listings of low density areas, on page 62 and 63, which were also illustrated on accompanying maps of the H12 areas - <https://www.cheshireeast.gov.uk/pdf/planning/spatial-planning/local-plan-consultations/macc-local-plan-combined-chapters.pdf>). Regrettably, without definitive clarification, we must find this revised SADPD policy to be unsound.

Policy HOU13: Housing delivery

47. CPRE supports this policy. Like CEC, we would also like to see a much greater use of masterplans, design codes and area wide assessments and we would very much support the imposition of planning conditions requiring development to begin within a timescale shorter than the relevant default period. This policy should be cross-referenced with the town centre and retail policies RET 1, RET 2, RET 10 and RET 11.

TOWN CENTRES AND RETAIL

RET1: Retail hierarchy,

RET 2: Planning for retail needs

RET 8: Residential accommodation in the town centre

RET 10: Crewe town centre

RET 11: Macclesfield town centre

48. CPRE feels it has no option but to find the five abovementioned policies unsound on the basis that they relate to a set of circumstances in the retail sector that no longer exist and that is not going to return. We are aware that CEC has said it is working on "town centre vitality plans" and that, at the same time the SADPD consultation is running, there is also an open consultation on town delivery plans (associated with a refresh of the Local Transport Plan). We appreciate that it may be possible in future to make town centres more attractive by promoting leisure activities and holding special events but such an approach is not going to sustain every shopping centre and every part of every centre.
49. The fact of the matter is that most retail spending has now moved on-line and most town centres are in a terminal decline. There is no longer a demand for town centres which cover a substantial land area and there is a desperate need for a change of direction. It would appear that the government has recognised this fact and, at the time of writing this submission, the government had indicated it

would be making an announcement soon about the matter. Also, when the housing minister, the Rt. Hon. Christopher Pincher, MP, addressed Savills Annual Housing Seminar on November 23rd he said:

“... fundamentally we need to build more homes. More homes around the country in places that are needed because the level of stock is poor. In places that they are needed because we need to reimagine our town and our city centres as we emerge from the Covid epidemic”.

50. Every town centre in Cheshire East, ie. the two main towns of Crewe and Macclesfield and the key service centres, should be subjected to a complete reappraisal exercise which, amongst other things, looks at where it might be possible to re-assign areas and buildings for residential use. (Policy RET 8 only appears to view living accommodation in town centres as something which would utilise the upper floors of retail units and/or be part of ‘mixed use development schemes’, not to be considering re-classifying whole sections for housing). Such a re-appraisal exercise, (along with the re-appraisal of employment sites), would lift the pressures off greenfield sites.
51. These five policies should be cross referenced to Policy HOU13 on housing delivery which says: *“The council supports the use of masterplans, design codes and area-wide design assessments to help bring forward and co-ordinate the delivery of housing sites and infrastructure in the borough”.* This seems to support the point we are making.

SITE ALLOCATIONS

Middlewich

These are the comments we made in response to iteration 1 of the SADPD:

52. *“Site MID 2 (on Croxton Lane) is at the edge of town and on land currently used for growing maize. This raises concern about the land being high grade agricultural land (Best and Most Versatile, Grade 1) and whether it should be saved for future farming. Without prejudice however, the site is bounded by an existing housing development and by the canal so there is a logical boundary for land use purposes.*
53. *Site MID 3 includes land on Centurion Way and this is in our view the least appropriate site, as it is in open countryside and thus a less logical place to build. It has an arbitrary border to the site which would be vulnerable to speculative housing. Pedestrian access to the town centre would be along a very busy road (main road to the M6). In our view this site is a form of countryside encroachment and therefore we are strongly opposed”.*
54. We sustain our concerns about MID 2 and our objection to MID 3. The latter is on the edge of the town. It was part of a large cross-border application for 370 dwellings that was refused by both CEC and by Cheshire West & Chester Council. The Town Council objected because use of this land for housing would open up expansion of the town into the open countryside. The only change in the revised version is that any developer is now required to submit a Mineral Resource Assessment as part of any planning application. This site should not be developed; there is no need for this housing as demonstrated earlier in this response.

Gypsy, Traveller and Travelling Showpersons sites

55. Site G & T 5 (Cledford Hall, Cledford Lane, Middlewich). This site cannot be supported. It is too close to industrial sites.

Request to be represented

56. CPRE Cheshire wish to be represented at the examination in public into the SADPD on all 'matters' where our comments in this submission are relevant. Thank you.

Yours sincerely

Jackie Copley, MRTPI MA BA (Hons) PgCert

Planning Manager