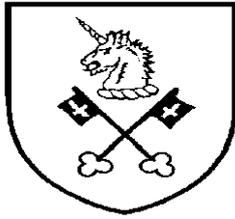


# *Prestbury Parish Council*



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21<sup>st</sup> October 2018

**CESHIRE EAST LOCAL PLAN:**  
**FIRST DRAFT SITE ALLOCATIONS AND DEVELOPMENT POLICIES DOCUMENT**  
**(SADPD), AUGUST 2018**

**Dear Sir / Madam,**

The document has prompted a very detailed discussion both within the Council and in the wider Prestbury community as you will see reflected in the number of comments from the aforementioned. For our part we have received numerous public submissions and hosted a public meeting that was very well attended. What follows is a consolidation of the views of our residents as expressed to us both at a generic and a site specific level:-

**Methodologies applied to housing figures in Part 1 and to site selection in Part 2 of the Local Plan**

The population growth figures used to underpin the housing calculations for Part 1 of the plan are now known to be wrong. In March this year, as part of its response to the consultation on 'Planning for the Right Homes in the Right Places', the Ministry of Housing, Communities and Local Government (MHCLG) published a draft methodology for calculating housing need based on reduced population projections. According to this, which was worked through for every local authority, the annual Cheshire East housing delivery figures would be 1,142 per annum, instead of the 1,800 in the LPS, equating to 22,840 homes over the 20-year period of the plan instead of 36,000. We recognise that this was only a draft methodology and are aware that a final version is due to be published soon by the MHCLG. However, we can only comment on what exists at the time this consultation on the Cheshire East SAPD is taking place.

Regarding the methodology used by Cheshire East Council to select development sites, Prestbury Parish Council questions the soundness of the process. There are two issues in particular which concern us.

As with Part 1 of the Local Plan, Cheshire East Council has been over-reliant on the results of its 'Call for Sites'. It has been less than pro-active in establishing where potential brownfield sites exist and endeavouring to bring them forward.

It was very noticeable during the time that the Regional Spatial Strategy existed – and, along with it, a statutory percentage requirement for brownfield sites – how committed all the local authorities were in seeking out under-used and previously developed sites, approaching owners and helping to deliver them into the planning system. It was entirely predictable once the RSS was revoked and local authorities stopped being so pro-active in searching out brownfield sites that landowners and developers would concentrate on greenfield/ Green Belt ones. Cheshire East is not alone in falling short in this respect, but it has.

Cheshire East's other major shortcoming is in not taking adequate account of planned and actual development occurring immediately on the other side of its borders. Prestbury Parish has a border with Greater Manchester at the former Woodford Aerodrome site where Stockport Borough Council are bringing forward hundreds of new homes, the traffic from which will impact on Bonis Hall Lane and beyond. As it is, the A555 Manchester Airport Relief Road (MARR) – which has just opened – and the planned Poynton Relief Road are predicted to increase traffic significantly on Bonis Hall Lane (part of the B5358) – the entirety of which is within Prestbury Parish.

### **Organic Growth**

Report FD40 outlines the proposal for an additional 130 dwellings within Prestbury of which 55 have been generated through 31.3.17 via organic growth since the inception of the Local Plan in 2010. This equates to an average of 7.8 per year. Prestbury Parish Council has been supplied figures by Cheshire East Council which indicate a further net +4 through to 31.3.18. Combined with the figures in the draft consultation, that equates to an average of 7.4 per year. In the six months since 1.4.18 a further net 6 dwellings have been approved (17/4862M & 18/3597M) with additional multi-dwelling applications currently before Cheshire East Council awaiting a decision.

We contend that with 8.5yrs data known of a 20-year plan (42.5% of term), we remain on target to deliver a housing total well in excess of the 130 required. Furthermore, because we are trending ahead of the 130 allotted to our Parish, the average over the remaining period can drop by a staggering 22% from 7.4 to 5.8 per annum and we would still meet the target.

Such a large sample cannot simply be ignored and throws into question the need for additional artificially created housing stock when viewed against the current methodology which we believe to be inflated. This is especially the case when one considers that the proposal before us involves the permanent destruction of Green Belt and the subsequent loss of public amenity.

### **Green Belt**

The Parish Council strongly object to the permanent loss of Green Belt proposed. We have recently lost nearly 80 acres to the relocation of Kings School from neighbouring Macclesfield to Prestbury. We are not aware of any other Local Service Centre that has proportionally lost more in recent times and if we are to lose more, then that loss of the public amenity must be compensated for through village benefits that outweigh the harm.

We welcome the acknowledgement within the report (paras. 3.111-3.114) that sites deemed as making a “significant contribution” or “major contribution” were not considered for selection in the site process using the iterative approach applied to the non-Green Belt and “contribution” Green Belt Sites. To the extent that re-evaluation is required we trust that such important sites will continue to be respected and safeguarded.

## **Traffic**

Any future residential development in Prestbury will generate traffic, particularly in the peak hours when there is already considerable strain which will only be exacerbated by the relocation of Kings School to Prestbury as mentioned above.

In addition, major alterations to the highway network to the north of the Borough i.e. the now open A555 road; the proposed Poynton Relief Road, the subject of a public inquiry in November, and the proposal for a link road between the M60 and the A555, together with the proposed provision of some 21,000 new houses in Cheshire East and Greater Manchester within a 10 kilometre radius of Prestbury will create a fundamental change to travel routes both to the north and south of Prestbury.

Some of the above changes may prove to be beneficial to Prestbury and some detrimental, what we do not know is the net effect. Prestbury Parish Council are aware that some traffic flow modelling has taken place but have previously questioned the lack of detailed information that the public have subsequently been provided with. We would ask for some data to be supplied in the next iteration of the SAPD to allow for the public to evaluate the interconnected dependency of this information as it pertains to increased residential dwellings in Prestbury and surrounds. By then the re-written draft of the Greater Manchester Spatial Strategy will be in the public domain.

## **Pedestrian Access, Public Transport, Density and Retaining the Character of the Area**

It has been repeatedly brought to the Parish Council's attention by our residents that any future development sites must include safe pedestrian access to the village centre and local amenities such as public transport. Some sites which came forward in the 'Call for Sites' exercise offer this, whilst others could be configured as to allow such. When considering sites we would ask that this criterion is kept to the forefront of the process.

Similarly, the density of various parts of the parish is critical to retaining the character of each part, as is made clear in the Prestbury Village Design Statement which contains a density table. The Parish Council and the residents of our parish are very keen to see the character of the area retained.

## **Site CFS391 Plot 1 Land at White Gables Farm**

The Parish Council note that this is the only non-Green Belt site included in the first draft SAPD, but need to point out that the site is not viable in the form proposed. The site shown on the map comprises land owned by the site owner and land belong to 2 Castle Hill which is freehold and has not been privy to this process. This land at 2 Castle Hill must be removed from this process unless the site developer can show they have an agreement or authority to proceed which we know at the time of writing not to be the case and nor have any discussions to allow for this ever been held. It is disappointing at best to note that the "site promotor has confirmed that the development is deliverable" when it most definitely is not in the current form and proposed size and throws into question the validity of their due diligence and subsequent assertions.

The assessment on the suitability of this land makes mention several times of the requirement for access to be via a new road constructed to join Castle Hill. The land owned by the site promotor does not border Castle Hill making this an impossibility without future land acquisition. The alternative access point via Spencer Mews is unsuitable for a development of this size with single lane access, the requirement to cross the main village footpath, proximity to a pedestrian crossing, poor visibility and splays, and impact on the main Conservation Area.

In conclusion this site, if it is to proceed, requires a complete re-evaluation against the criteria imposed and identified in Cheshire East's 'Traffic Light System' before any accurate determination can be made as to its suitability or otherwise.

## **Site CFS574 Land south of Prestbury Lane**

Prestbury Parish Council are concerned that paragraph 3.99 of FD40 that speaks to the potential to mitigate traffic issues at “both ends of Prestbury Lane” is divorced from reality. The junction of Prestbury Lane with the A523 London Road is the accident hot spot within the parish and is especially dangerous due to the high speed nature of the ‘A’ road. Improvements to it would most certainly be welcome and while no detail has been provided as to how the inferior aspects of this junction could be mitigated, there does appear at least to be the possibility of doing so here due to the lay of the land. At the Prestbury Lane junction with Heybridge Lane, the statement that it is a “relatively narrow road with no footpath” underplays the situation. The road narrows to a pinch point within mere meters of the junction that makes it into a single lane. On either side are steep embankments held back by retaining walls bordering private freehold properties. Again, while provision to improve this junction would be very welcome, we would welcome disclosure of the initial assessment that supports the assertion that any suitable mitigation measures can be implemented here.

The Parish Council remain opposed to the permanent destruction of the Green Belt. We note the exceptional reasons for doing so outlined in para 3.105 and the justification in para 3.106 that it is not “practical to fully meet the development needs of the area without amending Green Belt boundaries”. As per above, the statistical evidence for Prestbury as we approach the mid point of the plan would indicate that this is not the case based on current methodology and desired outcomes.

Were this site to proceed the case for pedestrian access to the village centre has not been made. The route proposed is circuitous and may not be sufficient to prevent people taking a more direct route via Prestbury Lane which is wholly unsuitable. Even linking to the existing Prestbury footpath 34 as proposed still results in the crossing of Heybridge Lane (part of the A538) on a bend with very poor visibility caused by the reduced splay. If this site were to proceed based on the pedestrian access proposed, then we would like to see this crossing point improved.

We note that para 3.110 stipulates that the impact on ground water should be conducted at the planning stage. It seems a folly to pursue this process now only for the land to be potentially deemed unsuitable post 2020 once the plan is complete and the prospect to revisit other sites during the process has lapsed. A number of residents have made anecdotal comments to us pertaining to the suitability of the site with regard to drainage and the existing open water. While this in of itself may not preclude development, we would like to see further evidence of suitability pursued prior to the next consultation if this land is to remain in scope.

## **Alternative Sites**

It was relayed to the Parish Council at its meeting with Cheshire East Council planners on 4<sup>th</sup> October that the sites identified during the ‘Call for Sites’ and presented in the draft public consultation are subject to change, including potential additions. With the universe of potential sites unknown it is therefore not possible to make any determination on the viability or priority of one over another. It is deeply unfortunate that this is the case as we are well aware that the next iteration of the SAPD is the one which will go before a planning inspector for determination.

## **Conclusion**

Prestbury Parish Council has engaged with the Cheshire East Local Plan process throughout its gestation and took part in the examination in public on Part One of the plan. We are not fundamentally opposed to the need for more housing within the borough and we are sympathetic to a point with regard the difficulty faced by Cheshire East in attempting to supply this in Prestbury and elsewhere. However, we have previously expressed concern about the soundness of the economic growth projections, the housing numbers these generated and the amount of Green Belt which needed to be surrendered as a result.

We believe that the revised population figures issued this year by government and by the Office for National Statistics have validated our viewpoint that Cheshire East Council could have opted for more modest growth and housing figures, requiring less land take. This would not have affected the future economic prospects of the Borough.

Part One of the Local Plan, which was based on projections, arguments and statistics that applied at the time, is now adopted. Part Two would be fully justified in making some adjustments to housing and land use requirements based on altered projections. In any event, the policy in respect of Local Service Centres, of which Prestbury is one, is not totally prescriptive. Policy PG7 says:

*The Local Service Centres are expected to accommodate **in the order of 7 hectares of employment land and 3,500 new homes***". (Our highlighting). (Point no. 3, page 76, LPS).

Also, Table 8.4 of the Local Plan Strategy (LPS), which contains the same figures, is entitled: '**Indicative** Distribution and Development'. (Our highlighting). (Page 77, LPS). In other words, there is no hard and fast requirement for Cheshire East Council to provide for those exact allocations as it is seeking to do in the First Draft Site Allocations and Development Policies Document (SAPD).

Forecasting, as the name implies, is not a precise science. It is understandable that to make future determinations Cheshire East had to derive a starting point for projecting economic and population growth. However, as times passes the assumed data that underpinned the projections can be replaced by actual data derived from various Governmental sources. It would be illogical to not incorporate this into the process and we would ask Cheshire East to place greater emphasis on the current landscape over dogmatic pursuit of theoretical goals. This will ultimately result in a more accurate fit between what Cheshire East Council deliver and what Cheshire East needs, not just in Prestbury but beyond.

Summarising our case as far as Prestbury is concerned:

- Based on the relevant policy in Part 1 of the Cheshire East Local Plan, there is no hard and fast requirement for the settlement to accept a fixed number of new housing units
- Even if the number of housing units identified is taken as a given, current trends indicate that the Parish will meet the housing allocation made to it over the 20 years of the plan
- Neither of the two development sites proposed for Prestbury appear feasible in the form currently presented to varying degrees and require further evaluation and substantiation
- Insufficient account has been taken of (1) the impacts on the parish from developments that emanate in Greater Manchester, (2) the surrendering of a huge volume of Green Belt in the parish to the Kings School development (3) traffic flows, impact, and safety or (4) to the Prestbury Village Design Statement

Yours Sincerely



Cllr. John Martin, Chair, Prestbury Parish Council