

Date: 25<sup>th</sup> August 2016

Consultee ID: 755911

Matter: 3

## **CHESHIRE EAST LOCAL PLAN STRATEGY – PROPOSED CHANGES**

### **Matter 3: Planning for Growth – Green Belt, Safeguarded Land, Strategic Green Gaps and Open Countryside (Policies PG3, PG4, PG4a & PG5)**

1. The following hearing statement is made for and on behalf of the Home Builders Federation in regard to the Cheshire East Local Plan Strategy: Proposed Changes document (hereafter referred to as the *Proposed Changes* document). This statement responds to selected questions set out within the Inspector's *Matters and Issues* document (examination ref: PC A008).
2. The following responses should be read in conjunction with our comments upon the submission version of the Local Plan (dated 25<sup>th</sup> April 2014), original examination hearing statements (dated 20<sup>th</sup> August 2014), resumed examination hearing statements (dated 24<sup>th</sup> September 2015) and proposed changes document (dated 19<sup>th</sup> April 2016). The HBF has also expressed a desire to attend the proposed changes examination hearing sessions.

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

#### **3.1 Green Belt:**

***a. Are there any new issues or new evidence to suggest that the general approach and policy for the Green Belt is inappropriate, unjustified, unsound or inconsistent with the latest national policy (NPPF; ¶ 79-82)?***

3. See our response to part b below.

***b. Is the general approach to assessing, selecting and releasing Green Belt sites justified, objective, comprehensive, transparent, effective and soundly based, and should further smaller-scale releases of land from the Green Belt be proposed in the subsequent Site Allocations Plan as part of a further Green Belt review?***

4. The HBF agrees with the Council that the requirement to allocate sufficient land for the development of market and affordable housing, and for employment development to meet the identified needs constitute exceptional circumstances that justify the alteration of Green Belt boundaries through the preparation of the Local Plan (*Cheshire East Green Belt Assessment Update 2015*, examination ref: PS E034). Indeed it is noted that without such releases the amount of new development that could be planned would be low, this would lead to significant reliance upon neighbouring authorities agreeing to take any unmet needs. Our principle concern with the *Green Belt Assessment Update* relate to the objectivity of the study and the quantity of land released, which we consider should be greater. Our concerns are set out within our Matter 3 resumed examination hearing statement (examination ref: RM3.006). These issues are not repeated here.

5. In respect of further small scale releases we consider that these will be required as part of the subsequent Site Allocations Plan. This conclusion is based upon our concerns of potential under-delivery and lack of an adequate buffer of allocations, see our response to Matter 2 relating to the *'Proposed Changes'* document.

### **3.2 Safeguarded Land:**

***a. About 200ha of land is proposed to be released from the Green Belt and designated as Safeguarded Land; is there sufficient justification for releasing this amount and spatial distribution of land from the Green Belt, particularly in view of the conclusions of the Green Belt Assessments and Sustainability Appraisal and the need for flexibility?***

6. The HBF supports the provision of safeguarded land but does not consider that sufficient land has been provided to ensure that Green Belt boundaries "...will not need to be altered at the end of the development plan period..." (NPPF, paragraph 85). We set out our main concerns with the approach taken by the Council within our Matter 3 resumed examination hearing statement (examination ref: RM3.006) and comments upon the *'Proposed Changes'* document (paragraphs 29-33).

***b. Are there any new issues or new evidence to suggest that the revised approach to designating Safeguarded Land is inappropriate, unjustified, ineffective, unsound or inconsistent with national policy (NPPF; ¶ 83-85)?***

7. We refer to our previous responses.

***c. Should the Policy indicate how Safeguarded Land will be brought forward and released for development, and how will the designation of additional Safeguarded Land be addressed in subsequent plans?***

8. Yes, this would add clarity and certainty to the plan. It is noted that the recent Local Plan Expert Group (LPEG) report to Government recommends that 'reserve sites' be provided through the plan to add flexibility and enable the plan to react to rapid changes. The HBF supports the approach recommended by LPEG. In order to ensure a five year supply is maintained, without the need for a resource intensive and slow Local Plan review process, a similar approach is recommended in Cheshire East. The currently identified safeguarded land sites may form part of the supply of reserve sites.

### **3.3 Strategic Green Gaps:**

***a. Is the purpose and proposed approach to the designation of Strategic Green Gaps within the areas to the south, east and west of Crewe appropriate, fully justified, effective, positively prepared, soundly based and consistent with national policy?***

9. See below.

***b. Is the policy for development within the Strategic Green Gaps appropriate, fully justified, effective, soundly based and consistent with national policy?***

10. The HBF does not object to the overall purposes of the policy, to protect against coalescence and protect the separate identities of settlements, as set out at criterion 3. However the third element seeks to unnecessarily restrain growth on all sites within the Green Gap. This is not justified and takes no account of the differing levels of contribution sites will make to the key purposes of protecting against coalescence and maintaining the separate identities of settlements.

11. The HBF also does not agree that all areas within the Green Gaps should be assessed against Policy PG5: Open Countryside. There is no justification for assessing sites within the Green Gap in the same way as sites within the Open

Countryside. If there is no difference in how they are assessed it is unclear why both policies are required.

12. There is also currently a lack of justification for the area identified within the 'Broad Extent' in the policy and associated map.

***c. Are the general areas and extent of the proposed Strategic Green Gaps appropriate, fully justified, effective, soundly based and consistent with national policy, and is it appropriate to retain the "saved" policies of the Crewe & Nantwich Local Plan until detailed boundaries are defined in the Site Allocations Plan?***

13. It is noted that the detailed boundaries of the Green Gaps is to be defined through the Site Allocations and Development Policies Document. There is, however, little clarity upon how applications within the 'Broad Extent' area will be dealt with and what regard should be had to the designation given detailed boundaries are yet to be determined.
14. Whilst the "saved" policies are noted these are considerably out of date and do not reflect current development needs or other policies within the plan, including the need to provide a five year supply of housing land upon adoption. The saved policies also do not directly relate to Policy PG4a within the 'Proposed Changes' document. It is therefore unclear how the policies would work together.
15. The HBF recommend that the saved policies be withdrawn and either the boundaries of Green Gaps be identified within the Local Plan Strategy document or an interim position upon applications within the broad extent be established within the plan. Failure to provide such guidance will limit the potential to provide otherwise appropriate housing development in these areas.
16. Furthermore to provide opportunities for development within the 'Broad Extent' of the Green Gaps and to provide longevity of the boundaries a development buffer should be provided. A commitment to such a buffer, which extends beyond the plan period, should be included within the Local Plan Strategy. This will not only provide long-term certainty and continuity but also flexibility should the plan fail to meet its needs over the full plan period.

Yours sincerely,

*MJ Good*

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