

EiP Statement

Cheshire West and Chester Local Plan Part 2

Our ref 42189/MW/NMi
Date August 2018
To Programme Officer
From Lichfields

Subject **Matter 7: Approach to Settlement areas (Chester, Northwich, Ellesmere Port, Winsford, KSCs and LSCs)**

1.0 Introduction

- 1.1 Lichfields is instructed by Taylor Wimpey UK Ltd (Taylor Wimpey) [Representor ID: 1151341] to make representations on the Cheshire West and Chester Submission Local Plan Part 2 (March 2018) [SLP2]
- 1.2 This statement sets out written representations on behalf of Taylor Wimpey concerning Matter 7: Approach to Settlement areas (Chester, Northwich, Ellesmere Port, Winsford, KSCs and LSCs).
- 1.3 These representations are made in the context of Taylor Wimpey's development interests in CWaC, namely land at:
 - 1 Warrington Road, Cuddington;
 - 2 Chester Road, Tattenhall; and,
 - 3 Eden Grange, Cuddington
- 1.4 The following representations relate to two key matters:
 - 1 The principle of allocating and safeguarding additional residential land as part of the Local Plan Part Two to meet the development needs of the Borough; and,
 - 2 The release of land at Eden Grange, Cuddington from the Green Belt.
- 1.5 Plans showing the locations of these sites were submitted with our representations to the Local Plan Part 2 Publication Draft consultation.
- 1.6 The representations in this statement are additional to and should be read in conjunction with Taylor Wimpey's previous submissions on the Local Plan Part 2 as well as those representations made on other matters.
- 1.7 This statement responds in light of the Inspector's Matters Issues and Questions. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework [the Framework] and the National Planning Practice Guidance [the Practice Guidance].

2.0 Matter 7: Approach to Settlement areas (Chester, Northwich, Ellesmere Port, Winsford, KSCs and LSCs)

Issue 1: General Questions

The submitted plan defines the extent of settlements in the urban and rural areas.

Q1. What is the approach towards the definition of settlements?

- 2.1 Taylor Wimpey notes that no changes have been made to the settlement boundaries of Cuddington and Tattenhall in the SLP2 in relation to its sites in these settlements. The representations made on behalf of Taylor Wimpey to the Publication Draft Local Plan Part 2 [PTPD] in relation to Taylor Wimpey's sites in these settlements therefore still stand.
- 2.2 Local Plan Part One Policy STRAT 8 is a significant policy in terms of delivering the Borough's housing requirement and makes provision for "at least 4,200 new dwellings" (Lichfields' emphasis) within the rural area of the Borough. Policy STRAT8 establishes the number of dwellings that each Key Service Centre is expected to accommodate, which in the case of Tattenhall and Cuddington is "at least" (Lichfields' emphasis) 250 units and 200 units respectively. The Council's policy is set as minimum ("at least") targets collectively and individually and overdelivering should not be seen as an issue. The Council should not therefore treat these requirements as fixed targets and flexibility needs to be incorporated within the Local Plan to ensure that the appropriate provision is made. As part of this process, the Council should be identifying sufficient land in excess of the Local Plan housing requirement a re-defining settlement boundaries as necessary as this is the only means by which it can ensure that the requirement will be met and that development will be provided in the most sustainable locations.
- 2.3 The Council's approach should be to make best use of existing infrastructure and resources, as well as ensuring that the needs of the local community are met. The failure to allocate sufficient land in Key Service Centres will compound the existing problems already faced by Cheshire West and Chester's rural communities which includes population imbalance; a shortage of the right sort of housing; unaffordable housing; lack of affordable housing provision; withdrawal of services; and limited economic opportunity.
- 2.4 For the reasons set out in the representations submitted on behalf of Taylor Wimpey to the PTPD and in our Matter 3 paper, additional sites should be allocated and safeguarded land identified in the Local Plan Part Two, and a new policy should be introduced which provides a mechanism for its early review i.e. a 'Plan B' (such as adopted West Lancashire Local Plan Policy RS6). Specific sites should be identified as 'Plan B' sites now. This will ensure that the Local Plan Part Two is flexible and can respond quickly to the potential non-delivery of committed sites and any other shortcomings in its housing land supply.
- 2.5 As detailed in these representations, Taylor Wimpey's land interests at Warrington Road, Cuddington and Chester Road Tattenhall represent appropriate sites for housing, and would assist in the delivery of sustainable development by making a significant contribution towards meeting the need for market and affordable homes.

Q2. How have they been defined?

- 2.6 For the reasons set out in our representations to the PTPD and in this matter paper, it is considered that the settlement boundaries Tattenhall and Cuddington have been incorrectly

defined and should be amended to accommodate land at Chester Road, Tattenhall, Land at Warrington Road Cuddington, and Land at Eden Grange Cuddington.

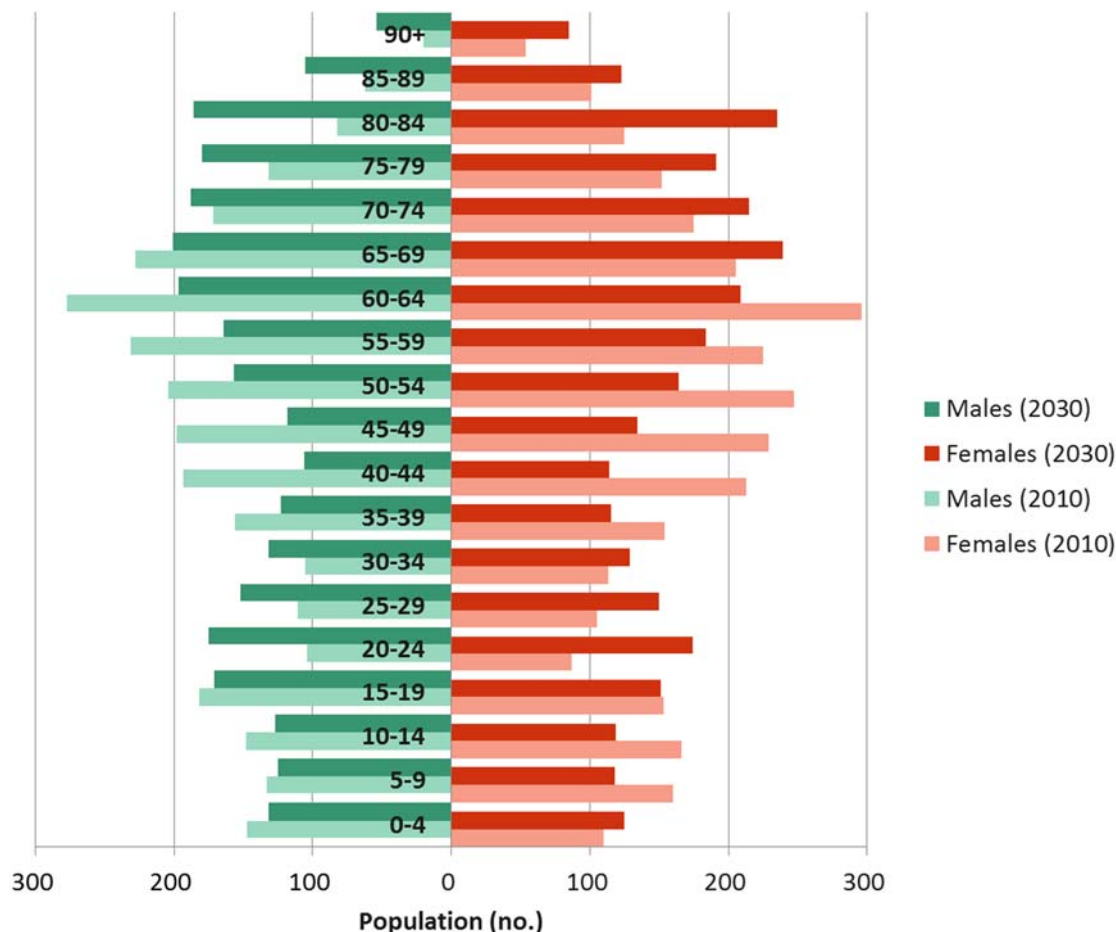
Q3. Is the approach taken justified, robust and effective?

- 2.7 The approach taken to the identification of settlement boundaries around Tattenhall and Cuddington is not considered to be justified, robust and effective as it does not align with the approach identified above and in our representations to the PTPD on behalf of Taylor Wimpey.
- 2.8 The purpose of the Local Plan Part Two is to provide the detailed policies and land allocations required to deliver the overall strategy for the Borough. However, as currently drafted, it fails to allocate sufficient additional residential land within the Key Service Centres, including Tattenhall and Cuddington to assist in delivering the levels of housing growth set out in Local Plan Part One. We deal with this matter in our Matter 3 paper and in detail for Tattenhall in our Matter 4 paper and in paragraphs 2.23-2.24 below. Our response in relation to Cuddington is set out below.

Warrington Road, Cuddington

- 2.9 Taylor Wimpey notes that its site at Warrington Road, Cuddington remains outside of the settlement boundary on the SLP2 Submission Policies Map [Map Change 158] and is identified for retention in the Green Belt on Map: D Green Belt and Countryside.
- 2.10 For the reasons set out below, Taylor Wimpey considers that land at Warrington Road, Cuddington should be identified as safeguarded land. If insufficient non-Green Belt sites can be identified to meet the needs of Cuddington and Sandiway, the Warrington Road site should be released from the Green Belt and identified as a 'Plan B' site.
- 2.11 As Figure 1 shows, population profiles for Cuddington indicate increases in the 20-24, 25-29 and 30-34 age profiles over the period to 2030. It is therefore vital that the plan caters for this population to ensure that their needs are met and to help ensure that a local employment pool is available to jobs local services such as education and healthcare over the plan period.

Figure 1 Cuddington population pyramid - MYPE2010-15 and 2014-based SNPP Rates



Source: Lichfields' analysis

2.12 The Cheshire West and Chester 2013 SHMA¹ indicates that, relative to the Cheshire West and Chester average, the proportion of 5-bed properties in Cuddington and Sandiway is in excess of the Borough average (132% of the average) as are detached houses (176%). In contrast the proportion of 1-2 bed properties is well below the average (64% of the average) and flats (46%), terraced houses (49%) and semi-detached houses (71%) are all below the Borough average. The suitability of existing accommodation to meet the needs of this younger population is therefore questionable given the lack of smaller properties compared to the Borough average. The delivery of housing allocations where a broad mix of house types and sizes can be provided would help address this issue.

2.13 Whilst this issue may have been addressed in part by the 173 net completions in Cuddington and Sandiway since 2013², Taylor Wimpey notes that sites within the 5 year supply pipeline in Cuddington and Sandiway will make a limited contribution to the 5 year housing supply which is unlikely to cater for the needs of these younger age groups. For example, the Housing Land Monitor Report (2017-2018)³ suggests that the sites identified with planning permission are

¹ Cheshire West and Chester 2013 Strategic Housing Market Assessment (July 2013) Table B19a and B19b

² Based on net housing completions identified in the Housing Land Monitor Report 2017-1018, Table 10.1

³ Housing Land Monitor Report (2017-2018) Appendix Four: Five Year Forecast

expected to deliver 26 dwellings by 2023. Based on the delivery of 173 since 2013 and an additional expected delivery of 26 by 2023, the Council are making no provision for the delivery of additional housing over a 7 year period to 2030 in this Key Service Centre.

- 2.14 In terms of market signals for Cuddington, a review of data⁴ for 2014-2018 indicates that average house prices have increased within the Weaver and Cuddington ward year on year by approximately 10.3% over the four year period to £260,383. The comparable house prices for the Borough show that the average house price in CWaC have increased by approximately 11.4% over the past 5 years to £238,350.
- 2.15 In 2018, the average house price in the Weaver and Cuddington ward was approximately 9.2% more than that of the average house price within the Borough. Over the past 5 years, house prices in the Weaver and Cuddington ward have been on average 9.2% higher than the wider Borough. This is despite average house prices in the borough increasing at a higher annual rate; albeit the starting point for the borough average was much lower.
- 2.16 In 2016, the average property price within the Weaver and Cuddington ward (£256,763) was approximately 30.3% higher than that of the North West (£197,000), with the average property price in the Borough being 15.5% higher (£227,542).
- 2.17 The increasingly high average house prices within the Weaver and Cuddington ward suggest that the market is under stress. This is particularly pertinent in the context of the Borough where average house prices are increasing at higher annual rate yet, despite this, remain lower than the average house prices within the Weaver and Cuddington ward.
- 2.18 In this regard, it is considered that there are housing market pressures within Cuddington when considered in the context of the Borough and it is considered that the identification of additional housing sites and the delivery of an appropriate housing mix in Cuddington would help address these pressures.
- 2.19 A Delivery Statement has been prepared for the Warrington Road, Cuddington site and was submitted with our representations to the Local Plan Part 2 Publication Draft consultation. The site will deliver a sustainable residential extension to Cuddington and can accommodate up to approximately 350 dwellings with associated landscaping and open space. The Delivery Statement Demonstrates that:
- 1 The land to the East of Warrington Road is a sustainable, developable and deliverable site on the edge of the urban area and that the proposed development accords with the principles of sustainable development;
 - 2 There are “exceptional circumstances” to justify the release of land to the East of Warrington Road from the Green Belt, and its identification as safeguarded land. Its development would not harm the five purposes of the Green Belt as set out in the Framework;
 - 3 The land to the East of Warrington Road is entirely appropriate for residential development due to its proximity to services and facilities;
 - 4 The land to the East of Warrington Road has no technical or environmental constraints that would prevent the development of the site; and,

⁴ CWaC Compendium of Local House Price Statistics (May 2018)

- 5 The land to the East of Warrington Road would have no adverse impacts which would significantly or demonstrably outweigh the benefits of allocating the site when assessing its suitability against the principles set out in the Framework.

2.20 Taking the above factors into account Taylor Wimpey considers that Land at Warrington Road, Cuddington should be identified as safeguarded land to help meet future requirements in Cuddington. However, if insufficient non-Green Belt sites can be identified to meet the needs of Cuddington and Sandiway, the Warrington Road site should be released from the Green Belt now and identified as a 'Plan B' site to help meet requirements over the plan period.

Chester Road, Tattenhall

2.21 Taylor Wimpey notes that its site at Chester Road, Tattenhall (as shown on the plan showing the location of the site submitted with our representations to the Local Plan Part 2 Publication Draft consultation) remains outside of the settlement boundary on the SLP2 Submission Policies Map [Map Change 167].

2.22 For the reasons set out in our representations to the PTPD and in our response on behalf of Taylor Wimpey to the other Matters, Issues and Questions it is considered that Land at Chester Road, Tattenhall should be allocated for residential development in the Local Plan Part Two and included within the settlement boundary of Tattenhall, or at least, identified as a 'Plan B' site. In particular we note that:

- 1 The land at Chester Road, Tattenhall is a sustainable, developable and deliverable site on the edge of the urban area and that the proposed development accords with the principles of sustainable development;
- 2 The land at Chester Road is entirely appropriate as a residential allocation due to its proximity to services and facilities;
- 3 There are no technical or environmental constraints that would prevent the development of the site; and,
- 4 The land at Chester Road would have no adverse impacts which would significantly or demonstrably outweigh the benefits of allocating the site when assessing its suitability against the principles set out in the Framework.

Eden Grange, Cuddington

2.23 Taylor Wimpey notes that its site at Eden Grange, Cuddington (as shown on the plan showing the location of the site submitted with our representations to the Local Plan Part 2 Publication Draft consultation) remains outside of the settlement boundary on the SLP2 Submission Policies Map [Map Change 158] and is identified for retention in the Green Belt on Map: D Green Belt and Countryside [in relation to Local Plan Part One Policy STRAT 9: Green Belt and Countryside].

2.24 The site at Eden Grange site comprises a previous former factory site within the Green Belt. Outline planning permission was granted on the site in June 2011 for residential-led development (Use Class C3) with public open space, allotments (Use Class sui-generis agriculture) and development ancillary thereto (including community building - Use Class D1) [Application Ref: 10/02283/OUT]. This residential development has now been completed.

2.25 For the reasons set out in the representations submitted on behalf of Taylor Wimpey to the PTPD, the retention of the Eden Grange site within the Green Belt is no longer necessary as it

does not contribute to openness or the five purposes of including land within the Green Belt. It's retention does not therefore accord with the fundamental aim and purposes of the Framework which allows the removal of land when redefining boundaries.

2.26 The Eden Grange site is enclosed by well defined, readily recognisable and permanent defensible boundaries. The grant of planning permission for residential development has established that the contribution of the site to the five purposes of the Green Belt is not such that development within the site is unsuitable in terms of its harm to these five purposes.

2.27 The boundaries of the Green Belt should be amended to allow the removal of the Eden Grange site from the Green Belt. Map: D Green Belt and Countryside should be amended accordingly. With regard to this matter, Taylor Wimpey notes that the main settlement of Cuddington and Sandiway, which is located a short distance to the south of the site, falls outwith the Green Belt. There may therefore be scope to remove the small area of Green Belt between the site and the settlement, as well, and draw a new settlement boundary around Cuddington and Sandiway which includes the Eden Grange site and this area.

Recommended Changes

2.28 In order to ensure that the Local Plan Part 2 is justified, robust and effective, the following changes should be made:

- 1 Land at Warrington Road, Cuddington should be identified as safeguarded land. If insufficient non-Green Belt sites can be identified to meet the needs of Cuddington and Sandiway, the Warrington Road site should be released from the Green Belt and identified as a 'Plan B' site. Map: D Green Belt and Countryside should be amended accordingly.
- 2 Land at Chester Road, Tattenhall should be allocated for residential development in the Local Plan Part Two and included within the settlement boundary of Tattenhall, or at least, identified as a 'Plan B' site.
- 3 The boundaries of the Green Belt should be amended to allow the removal of the Eden Grange site from the Green Belt. Map: D Green Belt and Countryside should be amended accordingly.