



Appeal Decision

Inquiry opened on 16 July 2013

Accompanied site visit made on 19 July 2013

by Philip Major BA(Hons) DipTP MRTPI

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

Decision date: 18 October 2013

Appeal Ref: APP/R0660/A/13/2189733

Land north of Congleton Road, Sandbach, Cheshire CW11 1DN.

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for outline planning permission.
 - The appeal is made by Taylor Wimpey UK Limited and Seddon Homes Limited against Cheshire East Council.
 - The application Ref: 12/1903C, is dated 17 May 2012.
 - The development proposed is the erection of up to 160 dwellings¹, including access and associated infrastructure, and the demolition of No 130 Congleton Road.
-

Preliminary Matters

1. The application is made in outline with all matters except means of access reserved for future determination. I have considered the appeal on that basis, though recognise that the additional information submitted indicates how the Appellants would envisage development being carried out.
2. I carried out an accompanied site visit as noted above, and unaccompanied visits on other occasions before, during and after the close of the inquiry.
3. Had the Council determined the application it would have refused it as an unsustainable development because it involves the use of land within the open countryside contrary to policy, because the Council can demonstrate a 5 year supply of housing land, and because it would be premature to the emerging development strategy. Development Plan Policies PS8 and H6 are cited.

Background

4. I conducted the inquiry into this proposed development immediately prior to another inquiry into a proposal for housing at Sandbach Road North, Alsager (APP/R0660/A/13/2195201). Both of these cases have similarities in that they raise some similar issues and are located in the same local authority area. For that reason some of the evidence I heard was common to both, but each decision has been made in the light of the particular circumstances of the individual case. Nonetheless there are some matters of overlap where, for reasons of efficiency and to speed up decision making, it has been possible to provide text which is common to both.

¹ The application form indicates up to 195 dwellings but this was amended during the time the application was being considered by the Council.

Decision

5. The appeal is allowed and planning permission is granted for the erection of up to 160 dwellings, including access and associated infrastructure, and the demolition of No 130 Congleton Road at land north of Congleton Road, Sandbach, Cheshire CW11 1DN in accordance with the terms of the application, Ref: 12/1903C, dated 17 May 2012, subject to the conditions set out in the attached schedule.

Main Issues

6. There are a number of issues for consideration. These are:
 - (a) Whether the Council is able to demonstrate a deliverable five year supply of housing land;
 - (b) The impact of the proposed development on the character and appearance of the locality;
 - (c) The impact of the proposal on highway safety;
 - (d) Whether the loss of best and most versatile agricultural land is justified.

Planning Policy Background

7. It is common ground that the development plan is the Congleton Borough Local Plan and its Review of 2005 (CLP). This plan covers that part of the area of Cheshire East Council (CEC) which incorporates the former Congleton Borough Council. I deal with the relevant policies shortly.
8. There is a draft Local Plan, variously described as the Core Strategy and Development Strategy, which is moving towards a position in which it can be submitted for examination. The Council is seeking to achieve this in late 2013. The current state of the plan is pre submission. It is not disputed that there are many outstanding objections to the plan, and to specific proposals in the plan. Hence it cannot be certain that the submission version of the plan will be published in the timescale anticipated. The plan has already slipped from the intended timetable. In addition there can be no certainty that the plan will be found sound though I do not doubt the Council's intentions to ensure that it is in a form which would be sound, and I acknowledge the work which has gone into the plan over a number of years.
9. Nonetheless I cannot agree that the draft Local Plan should attract considerable weight as suggested by the Council. There are many Secretary of State and Inspector appeal decisions which regard draft plans at a similar stage as carrying less weight. The Council's own plan has been afforded little weight in the earlier months of 2013, and although the plan has moved on to an extent, it has not moved on substantially. For these various reasons I consider that the draft Local Plan can still attract no more than limited weight in this case.
10. I note here that the draft Local Plan preparation has included information from the Sandbach Town Strategy, which is a non statutory document intended to identify options for the future development of the town. The appeal site was a site considered but rejected in that document. It is clear that this document is of importance to local people as an expression of their preferences, but it is less clear that it has any basis beyond that. Whilst not seeking to take away from its significance to local people it is, in essence, an information gathering

- mechanism which identifies options and provides evidence which in turn informs the preparation of the Local Plan, but can of itself carry little weight.
11. Of particular note in the CLP is Policy PS4, which deals with Settlement Zone Lines (SZL) around towns, including Sandbach. There was debate at the inquiry about whether this policy can reasonably be said to be related to or is a policy controlling housing land supply, and if so, whether it should be regarded as time expired given that the CLP has an 'end date' of 2011.
 12. The 'headlines' of Policy PS4 are that towns are defined by a settlement zone line (SZL) and that there is a presumption in favour of development (subject to criteria) within the SZL. The preceding section of the CLP explains the purposes of the SZLs in paragraph 2.52. It is common ground that there are 2 purposes. These are to define the boundary between built up areas and the rural areas, and to exclude land which requires protection from development either where it contributes to the character of the settlement, or where it is important to retain views of the surrounding countryside.
 13. It is clear, though, that the use of SZLs has an effect on where development (including residential development) is located. But the primary purpose of the SZLs is not to identify land for development in a positive sense (such as by making allocations) though the definition of SZLs would inevitably reflect allocations. Any SZL must therefore have taken account of housing land availability at the time it was drawn up, and this is signalled in the explanation at paragraph 2.53 in the CLP. That paragraph clearly indicates that the SZLs reflect the then current circumstances and allocations for the period to 2011.
 14. So Policy PS4 takes account of allocations and the identified requirement for housing land at that point in time, but was not intended to do so for a longer period. In setting physical boundaries around settlements which include the land identified for development there is clearly a relationship between SZLs and land identified for development. But I do not accept that the relationship is driven by the requirement for SZLs to identify land to meet a determined supply of housing – rather it is based on the objective to protect open countryside and Green Belt once development land has been identified. Hence it is my judgement that the definition of an SZL is not a housing land supply policy per se, but a reflection of the assessment which took place at the time the CLP was produced in relation to spatial settlement priorities which include both location of development and protection of the environment.
 15. I am therefore satisfied that Policy PS4 is not sufficiently directly related to housing land supply that it can be regarded as time expired for that purpose. The policy is primarily aimed at countryside and Green Belt protection, both of which are also aspirations of the National Planning Policy Framework (NPPF). In such circumstances I regard the policy as largely in conformity with the NPPF and attracting significant weight.
 16. That said there is no dispute that the proposed development would fall foul of CLP Policies PS8 and H6 which seek, respectively, to restrict development and residential development in the open countryside unless it is for one of a number of specified categories. The proposal does not fall into any of those categories.

17. More generally, there are a number of policies of the CLP which have been brought to my attention. I deal with the relevant policies under the various issues below.

Reasons

Housing Land Supply

18. Both main parties agree that the starting point for the calculation of a 5 year land supply should be the housing requirement set out in the former North West Regional Strategy (RS). Although the RS is no more, the evidence base which underpinned the housing supply figures is the only evidence which has been rigorously tested. Whilst more recent interim housing projections indicate that there may be some refinement of the housing requirement over the draft Local Plan period, there are no tested figures which relate to the whole draft Local Plan period. In addition the housing projection figures would be likely to be only one of a number of indicators and inputs which would be taken into account when setting future housing requirements. The Council has indicated that it intends to update the Strategic Housing Market Assessment alongside publication of the Local Plan, and until that process is completed there are no alternative reliable projections for housing need. I therefore agree that there is currently no sound basis for departing from the tested RS figures². Hence the housing requirement currently stands at 1150 dwellings per annum (dpa) for CEC. This is 5750 over 5 years. Following the advice in the NPPF requires the addition of either a 5% or 20% buffer (a matter I deal with later). The matter of previous underachievement and the subsequent backlog is also material.
19. Until a point early in 2013 it was undisputed that CEC could not demonstrate a 5 year supply of deliverable housing land in the terms set out in the NPPF. However, following the production of the revised Strategic Housing Land Availability Assessment (SHLAA) of March 2013 the Council now believes that it can demonstrate around a 7 year supply.
20. The assessment of land supply is not an exact science, and a measure of professional judgement is always required in order to reach a view on what is realistically achievable in a given period. Additionally the assessment is taking place in a dynamic environment – whenever a planning permission is granted it changes the calculations, and there have been a number of permissions granted in recent months in the CEC area. It is therefore hardly surprising that calculations changed during the inquiry, or that the Council and Appellant have reached different conclusions. It is interesting that the 5 year figure falls about midway between their relative assessments. As is made clear in the NPPF there must be a significant degree of confidence attached to the availability and deliverability of land for it to be included in the 5 year supply. If planning permission does not exist there should be good reason for believing that it would be forthcoming and that housing would be delivered (in whole or part) within the 5 year period.
21. There is some degree of coming together of assessments as a result of information presented during the inquiry, such as the updated position on planning permissions, which the Appellant acknowledges would update the

² I am aware of the recent case of *Hunston Properties Ltd v SoS for Communities and Local Government and St Albans City District Council*, but the case before me is distinguishable on its facts and it is pertinent that both parties agreed the relevant figures in this case.

- supply position by 397 dwellings on sites for more than 10 dwellings, and 76 dwellings on smaller sites. However, it is necessary to examine the issues where there are remaining disagreements leading to material differences in the assessment of deliverability. Setting aside for the moment the treatment of the backlog and buffer the major differences lie in the assessment of strategic sites and sites without planning permission. Housing land supply assessments cannot deal in absolute certainties, and in estimating numbers it is necessary to take a pragmatic and holistic approach.
22. CEC have postulated that about 4000 homes can be expected to be delivered on strategic sites over 5 years. The Appellants believes it would be about 1100 homes. The sites in question are included in the draft Local Plan and it is not disputed that some are subject to objection. Nonetheless the Council is confident of them coming forward and points out that only 4 strategic sites have been the subject of more than 50 objections. However, it is not the number of objections which is of merit, but the substance, and that is not a matter for me. The very fact that objections have been submitted must temper the confidence that the Council, or indeed I, can legitimately have towards the delivery of the strategic sites in the form currently proposed.
23. Having said that it is apparent that planning permissions are being granted on strategic sites in advance of the examination of the draft Local Plan, though to a limited extent. For example this is the case in respect of 'Sandbach 1' where planning permission has been granted for 50 dwellings, subject to a S106 agreement. Similarly 'Crewe 6' (The Triangle) has planning permission for 360 dwellings subject to a S106. But more generally I share the Appellants' concerns that the Council is being over-optimistic in its assessments for some draft strategic sites.
24. I say that for a number of reasons. First, there is simply not enough evidence to back up some of the claims made. It is to be expected that landowners and potential developers would talk up the likely delivery of housing development in their pre-application discussions and publicity. The Appellant companies do the same in consultation documents. I am also not convinced that the expectation of an early submission of a planning application can be afforded weight; experience shows that all too often expectations do not carry through into timely delivery. This is the position with a number of sites. Delivery claims must therefore be taken cautiously.
25. Secondly, the pattern of some strategic sites across the Borough is relatively concentrated. So although developers may want to 'get in first', it is more than possible that if developments begin to take off in one area, other developers may be reticent in instigating a development start because of potential difficulties with market saturation and competition in the immediate vicinity.
26. This in effect is the same point as the third reason, which is the projected rate of delivery used by the Council. Here it has departed from previous versions of the SHLAA (the updated version of which has been subject to objection in its revised methodology) and assumes higher delivery rates for developments of more than 200 dwellings. This in itself has been criticised as being unrealistic, and I have sympathy with that view. In my judgement it is more proper to take a cautious and conservative approach to delivery rates. The same caution should also apply to lead in times unless there is evidence to suggest otherwise, and I am not satisfied that that is the case here. Whilst there has

been an upturn in the housing market generally it is far from clear that this will be sustained, or that Cheshire East will achieve a quick response and high level of completions as suggested by the Council.

27. Fourthly, some strategic sites are dependent on enabling infrastructure being put in place, and interdependent with it, such as at Basford East. I admire the Council's confidence that all will run well and that infrastructure will be provided on time, but it cannot yet be assured. I recognise that the NPPF, in seeking to ensure that sites identified in the 5 year supply are deliverable cannot require complete certainty, but it does set a high benchmark of realism for the assessment. To be considered deliverable sites must be available now. I do not accept that a site in need of enabling infrastructure such as a link road can reasonably be assessed as being available now even if there is a clear intention to deliver that road in conjunction with housing. It may become available in 2 or 3 years time, but until then it would be unwise to place too much reliance on the potential for delivering housing from such sources. Similarly there is a distinct lack of credible hard evidence that the projections for Leighton West and other sites are achievable or realistic.
28. Underlying these concerns is the uncertainty around the actual delivery of the draft Local Plan. It is notable that at the inquiry local residents made it clear that they did not support the housing numbers proposed on 'Sandbach 1'. They prefer a far smaller number, and this is a matter which has yet to be resolved.
29. For all these reasons the Council's assessment of likely delivery on strategic sites is too great, and it should not be forgotten that if sites are excluded from calculations now, but come forward anyway, the delivery of a greater level of housing is not in itself problematic. There is no cap on numbers.
30. I turn now to the question of the backlog. It is agreed that the housing requirement has not been met for a number of years. The backlog is, cumulatively, some 1266 dwellings between 2003 and 2012, which takes into account the earlier years when there was some exceedence of targets. There is an additional shortfall in the year to March 2013 of about 500 dwellings, bringing a total in the region of 1750 to 1800. It is well known that there are 2 schools of thought on how to deal with a backlog – the so called Liverpool and Sedgfield methods. Liverpool spreads the backlog over the plan period (in this case to 2031 for the draft Local Plan) and Sedgfield over 5 years. There is no expressed preference for either method in the NPPF.
31. In this instance, however, the Council suggests that it would be appropriate to spread the backlog over the period of the RS, to 2021, or 9 years. The reason offered is that the backlog has been calculated by reference to RS figures from its publication, and the performance during the subsequent years has been measured in that light, so that it would be logical to complete the intended RS cycle. I do not agree with that suggestion. The intention of the NPPF is clear – it is to "boost significantly the supply of housing". That aim would not be best served by being too relaxed about the need to recover the backlog. I agree with the Appellant that every effort should be made to deal with the backlog in as short a time as possible. For that reason I subscribe to the Sedgfield method. So any calculation of housing land supply must include the provision of the backlog (at present) of about 1750 dwellings.

32. That leads me to the provision of a buffer. This should be either 5% or 20% in line with the NPPF guidance. There has been much debate about what would constitute persistent under delivery so as to trigger the 20% buffer, and previous decisions take differing approaches. But the purpose of a buffer is clear. It is to assist with the requirement to "boost significantly the supply of housing". The buffer is not extra housing as it is being moved forward in the plan period, and nor is it a penalty. Put simply, the buffer is a mechanism by which extra capacity is brought into the system now to enable housing supply to have a fighting chance of being boosted significantly.
33. There is no dispute that supply of housing has not met targets in the CEC area since the 2008/9 year. Since that time targets have been missed to the extent that the under delivery amounts to well over 2500 dwellings. The fact that there was exceedence of targets in the preceding years is not crucial to the matter of setting an appropriate buffer since none of the targets are ceilings in any event. A modest oversupply is acceptable, but should not be offset against a pattern of subsequent under supply for the purposes of setting a buffer.
34. To persist has been defined in dictionaries as "*to continue steadily or firmly in some state, purpose, or course of action, in spite of opposition or criticism*" and "*to continue steadfastly or obstinately*". That the housing supply numbers have fallen well below targets every year since the last meeting of targets in 2007/8 seems to me to demonstrate a steady course of action, which the Council would no doubt have liked to see remedied. The under delivery has been steadfast and obstinate, and no actions of the Council or others have been able to change its course. I am well aware that the years in question have coincided with the recession, and that under delivery is therefore not entirely surprising. But that fact does not alter the intentions of policy. Where there has been persistent under delivery, as is quite clearly the case here, action is required to seek to redress the situation because the need is not going to disappear. Part of that action is to increase the choice of land available by adding a 20% buffer to the housing land requirement. On balance I consider that 20% is the appropriate buffer.
35. If, therefore the housing land supply figures are re-worked with new assumptions the following situation becomes apparent. The 5 year requirement is 5750. To that must be added the backlog of about 1750, making a total of 7500. Adding the 20% buffer brings a total requirement of some 9000 dwellings over 5 years, or 1800 per annum. The fact that such a figure has rarely been reached in the past is not a reason for suggesting it is an inappropriate target. Significantly boosting supply surely implies that ambitious targets are appropriate.
36. The Council suggests that it can show a supply of something over 9000 dwellings in any event. However, I have already observed above that I consider the Council to be too optimistic. There is uncertainty surrounding the Local Plan itself. A large proportion of its identified supply is on strategic sites, and in my judgement delivery there is unlikely to come forward as quickly as the Council contends. Given that projections are inevitably estimates based on landowners' and developers' current thinking, on the understandable desire to 'talk up' the chances of delivery, and on professional judgement, it would not be a worthwhile exercise to try to deal forensically with every site in this case.

37. Both main parties to this appeal have provided expert assessments and the difference on strategic sites is marked – for the Council a delivery estimate of some 4000 dwellings, and for the Appellants not much more than 1100 dwellings. The outturn is likely to be somewhere between the 2, and I consider that a realistic figure is likely to be closer to the Appellants' figure than the Council's. However, for the purpose of this exercise I propose to allow leeway to the Council and assume a delivery on strategic sites of some 3000 dwellings. That removes about 1000 from their estimated supply, and brings it to about 8000.
38. There are other detailed differences between the Council and the Appellants in relation to the likely delivery from, for example, sites awaiting the signing of S106 agreements. One of these is the former Albion Chemical Works, which has been subject to a resolution to grant planning permission for some years, and has acknowledged delivery difficulties. The Council is optimistic of early delivery, but there is no concrete evidence to back up that optimism. Again it would be an academic and uncertain exercise to seek to examine each site in detail in this instance. Suffice to say that my judgement more closely aligns with that of the Appellants, and these further consequential reductions in likely supply would bring the ultimate total to a lower level. I consider a figure of 7000 to 7500 to be realistic, but at the top end of the scale.
39. I am therefore satisfied of the following:
- There is a housing requirement, including backlog and buffer of some 9000 dwellings over 5 years or 1800 per annum;
 - There is currently a demonstrable supply, taking a generous approach to Council estimates, which is likely to be in the region of 7000 to 7500 dwellings at most.
 - The demonstrable supply therefore equates to a figure in the region of 3.9 to 4.1 years.
40. As noted in paragraph 49 of the NPPF, therefore, the Council's policies relating to housing supply cannot be considered to be up to date, and there is a requirement to consider applications in the context of a presumption in favour of sustainable development. This is dealt with in more detail in paragraph 14 of the NPPF. It is worth pointing out that even had I applied a 5% buffer (which I do not regard as appropriate) the Council's supply would still fall below 5 years on the optimistic scenario I have used. Before carrying out the balance required by the advice of the NPPF I will turn to the other issues.

Character and Appearance

41. The appeal site is located on the edge of Sandbach, just beyond the SZL in an area of open countryside. The landscape is within the East Lowland Plain character type, but has no special designation. However it is clearly much valued by local residents whose homes overlook the land, and by other local people who use the footpaths which run across and close to it.
42. There are strong boundaries to the south and west, where the site abuts existing urban development and a paddock. The northern boundary is also strong and discernible on the ground, being formed of significant hedgerows backed by the grounds of Sandbach Rugby Club, with its distinctive posts and floodlights. The most open boundary faces east and north-east. Given its

close relationship with the town the development would not be perceived as an obtrusive finger of development extending the urban form in a strident manner. Rather it would be a development paying heed to the surroundings by restricting the land built upon to that which largely abuts existing development of various forms.

43. I saw at my site visits that the land is relatively flat and has most recently been in use to take a hay crop. It is typical of the Cheshire landscape, being pastoral, with intermittent trees and fields defined by hedges. The site is made up of some small scale elements such as the smaller fields closest to the west of the site, and I note that the current plan would be to retain these 'compartments' within the developed site.
44. The definition of the SZL, in being designed to limit the spread of development until 2011, recognised the intrinsic value of the land as part of the wider landscape. This was recognised too in the previous appeal decisions brought to my attention, and in the Local Plan Inspector's report. Previous decisions and reports are of interest and are material, but deal with cases at a time when circumstances were different, including in relation to housing supply. It is clear in this case that SZLs are not inviolable, nor are they intended to be static beyond 2011 where circumstances justify change. That said, there is uncontested conflict with policies PS8 and H6 which protect the countryside for its own sake.
45. There is no doubt that the development could only be realistically seen as detracting from the existing character of the landscape on the edge of Sandbach, simply because it would transform rural fields into a housing development. Dwellings, roads and other urban features on the scale proposed, however well designed, could hardly do otherwise. But I accept that there are mitigating features in this case. For example, the concept design includes significant areas of open space within the development and the retention of the public right of way which crosses the site in a green link. A further, new link to the west, which does not currently exist, would be an advantage. Mitigation could therefore be built in to a detailed design.
46. In addition, when the wider context is considered, the development would be likely to be relatively low key for its size in its overall visual impact. From the footpath which runs to the north-east houses would have a back drop of the existing town and the rugby club on one side. Furthermore, retention of existing trees, and the provision of a green area as currently planned, would offer the opportunity for the development to be assimilated without major disruption to the character of the wider area. Detailed matters would remain in the control of the Council.
47. There would of course be a visual change which would be of locally substantial impact, and moderate to slight impact further afield. But these visual impacts would be relatively self contained. The development would be seen as being well related to existing urban features such as the dwellings fronting Congleton Road, the dwellings and school along Offley Road, and the rugby club.
48. The residents of dwellings which back on to the land would see a significant change. I was able to observe the likely change at my accompanied site visit. I fully acknowledge the depth of concern expressed by those residents. However, no person has a right to a view, and although the view from some properties would be radically altered, I do not agree that living conditions

would be harmed to the extent that it should count against the proposal. The outlook from dwellings would be towards other houses, but the outlook would be likely to be filtered by vegetation. In my judgement there would be no unacceptable loss of privacy (though detail of design would rest with the Council), and no unacceptable disturbance. So even though I accept that some residents would lose a treasured outlook over what is currently open countryside, I do not accept that this can weigh significantly against the proposal.

49. Taking this issue in the round it is my judgement that the adverse impact on the character of the landscape, and the appearance of the area, would vary from substantial when the viewer passes through and is close to the development, to no more than a moderate impact on leaving the development, and only then when the viewer was located in the currently open area to the north and north-east. Even from this direction the backdrop of development and the existing topography, would reduce impact to slight or negligible as the viewer moved away. Additionally, impact on individual residents would not be so severe that it should militate against the development. In relation to the development plan I do not find any conflict other than with those policies noted above.

Highway Safety

50. This is not a matter contested by the Council, but I include it here as it is of concern to local residents. Access to the development would be taken from Congleton Road, and run between Nos 130 and 134. It is clear that adequate visibility would be available in both directions along the main road.
51. Concerns centre around the potential for conflict between residential traffic and school traffic serving the nearby primary school and in relation to the loss of on street parking in the vicinity of the proposed access.
52. I saw at my site visits that the area around the proposed site entrance is used for parking vehicles associated with dropping off and collecting children from school. There are currently no parking restrictions and I observed parking taking place across or close to the proposed access. It is clear that the new access would reduce the availability of parking in an area which is currently well used. But this must be seen in the context of the parking itself. First, it is an occurrence twice a day and is not constant. Secondly, the matter is unlikely to arise during school holidays. Thirdly, it affects a relatively small number of vehicles in the wider traffic situation. For these reasons I do not consider that the proposed access would generate unacceptable inconvenience for existing users of the highway in this respect.
53. Allied to this matter is the possibility of conflict between school children and traffic from the development. If approaching from the east on the northern side of Congleton Road children would be required to cross the access point. However, this would be likely to involve a relatively modest flow of pedestrians, and it is also the case that they could utilise any proposed new link within the development site to the existing footpath adjacent to the school. Overall I do not see this as being an unacceptable hazard.
54. It has been suggested that the development should make provision for displaced parking on Congleton Road by providing parking space within the site. I disagree. That would be a requirement, in effect, to provide a car park

for public use associated with the school. Given the relatively low level of conflict between the proposal and the existing situation I consider that to require such a course of action would be unreasonable.

55. In a wider sense there is concern about the level of traffic generation from the site and the likely exacerbation of existing traffic congestion hereabouts. This is a matter which has been addressed by the Council's highways officers and a contribution towards rectification of the situation has been agreed. This is addressed in the S106 Obligation to which I turn later. More generally, the CEC professional advice is that the proposed access is acceptable, and would provide a safe means of access to, and egress from, the site. I have no substantive evidence to disagree with that view. There is therefore no conflict with development plan policies GR9, 10, 14, 15 and 18 which, taken together, seek to ensure that development is acceptable in highway terms.

Use of Agricultural Land

56. The latest information confirms that about 3.8 hectares (some 60%) of the site is made up of the best and most versatile (BMV) agricultural land. This is a finite resource and the NPPF makes it clear that the economic and other benefits of such land must be weighed in the balance.
57. In this instance the loss of BMV land would be modest at worst. Much of Cheshire is acknowledged to fall into that category and in the light of the acknowledged need for housing it seems inevitable that some land of the higher quality will be required for development. In addition it is self evident that the proposed development would bring some economic benefit during the construction phase and to the town in the longer term, as well as social benefit in the provision of affordable housing. Whilst the loss of some BMV land is a disbenefit, in the context of this proposal the loss is of minor weight.

Other Matters

58. **Sustainability.** The putative reason for refusal indicates the Council's assertion that the site is not sustainable. Sustainability has 3 strands as set out in the NPPF. In environmental terms I have dealt with the impact of the proposal above. It would extend the town into open countryside and would conflict with policies of the development plan. In addition it would use BMV land to an extent, but that is a common necessity in this locality and cannot carry great weight here for the reasons noted earlier.
59. In locational terms the site is well located in relation to Sandbach town centre, which is a walkable distance away. It is also close to educational and other facilities. A bus service passes along the road outside the site. Whilst the railway station is further away, the site has several advantages of location which make it a suitable location, in principle, for residential development.
60. Economically the development would bring short term advantages of jobs and in the longer term would add population to the town and Borough which would be likely to increase prosperity and enhance vitality and viability.
61. The social thread of sustainability would be well served by the provision of 30% affordable housing. This is a matter which should carry significant weight in favour of the proposal given the acknowledged shortfall in affordable housing provision in the Borough. Taken overall I am not persuaded that the site can be regarded as unsustainable. Indeed I am satisfied that it is a sustainable location.

62. **Prematurity.** I do not underestimate the work which has taken place on preparing the draft Local Plan to date. But the submission draft has not yet been published and there are many outstanding objections. It has been made clear in many decisions that a plan at this stage of preparation cannot carry more than limited (or even little) weight. The outcome of examination in due course cannot be predicted.
63. Guidance (both extant and emerging) on this matter is clear. Refusal on the basis of a prematurity argument is rarely justified. This proposal is not so substantial that it would materially prejudice the housing objectives which the Council is seeking to promote through the draft Local Plan.
64. I also do not accept that a decision to grant planning permission in this case would assist any of the other current development proposals around Sandbach or elsewhere except, potentially, in relation to the assessment of housing land supply. But even then each decision must be made in the light of the evidence which is presented, and housing land supply is a dynamic area which changes constantly. Other material considerations will also play an important role on a case by case basis. The single exception to this relates to the land which lies to the west of the appeal site. Here it is likely that granting planning permission on the appeal site could reasonably be expected to have a material bearing on the way in which any application relating to the adjoining paddock would be considered. But even there any decision would have to be made on a site specific basis. Hence I do not consider that a precedent would be set in this case which would impart undue influence on other decision makers in all but a single potential case.
65. **Other decisions.** As is increasingly common I have been provided with many appeal decisions by both main parties which are produced to support their cases. As I have just indicated though, it is rarely the case that appeal decisions on other sites will bring to light parallel situations and material considerations which are so similar as to provide justification for a decision one way or another. That is certainly the case here. I am well aware of the emerging situation in relation to housing land supply, and to the treatment of that issue both in the CEC area and elsewhere. But my decision is based squarely on the evidence put before me. For that reason I do not accept that appeal decisions brought to my attention can have a determinative influence on this case.
66. At the inquiry it was made clear that the Appellants have a degree of control over land to the north east of the appeal site. Whilst I recognise the concerns that granting planning permission may lead to an application on a larger parcel of land this cannot be a significant factor here as I must make my decision based on the evidence before me. Any future application would be determined on its own merits.

Overall Balance

67. I now bring together the determinative matters at issue. In drawing up the overall balance in this case I start from the important finding that this proposal would develop housing on a sustainable site, and that the Council cannot at this stage demonstrate a supply of specific deliverable sites sufficient to provide five years worth of housing against their agreed housing requirements. The development plan is out of date as regards the provision of housing. This is the central and most relevant matter addressed in the appeal and carries

substantial weight. In addition there would be an agreed element of affordable housing provision, which is a further significant benefit.

68. However, there is conflict with the development plan in relation to the harm identified in respect of the adverse impact on the character and appearance of the surrounding landscape. But, paragraph 14 of the NPPF does not indicate that conflict with the development plan should result in planning permission being refused. The requirement of paragraph 14 (and indeed the whole of the NPPF) is that any adverse impacts must be balanced against the benefits. In relation to this development it remains the case that planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF as a whole.
69. The balance in this case is clear to me. The NPPF seeks to boost significantly the supply of housing. The proposal would help to achieve that aim. The addition of affordable housing is a significant added benefit. On balance I find that the relatively moderate overall landscape harm and loss of BMV land are material considerations of lesser weight. I do not find that the identified harm significantly and demonstrably outweighs the identified benefits. Hence the appeal must succeed and planning permission must be granted.

Conditions

70. A list of potential conditions was made available at the inquiry. This was largely agreed. I deal with them in topic areas and have amended or clarified them where necessary.

Conditions which meet the required tests:

71. Reserved Matters. It is reasonable and necessary to require reserved matters approval within standard timescales. It is also necessary to specify a number of matters which should be resolved at reserved matters stage in order to ensure a satisfactory form of development. These include details of boundary treatments and bin storage.
72. Drawings. A condition specifying the approved drawings, in order to clearly define the planning permission is necessary. I note here that the Council has reservations in relation to 2.5 storey dwellings as shown on some illustrative drawings, but this permission would require details of the appearance to be agreed in any event, and that matter can therefore be resolved at a later stage.
73. Drainage. It is reasonable and necessary to require drainage details be agreed at an early stage in order that adequate arrangements are made for sustainable drainage across the site. Unusually in this case, and because of drainage issues which have been experienced in the locality, it is necessary to impose a condition that drainage of foul and surface water should be to separate systems.
74. Construction Management. A scheme defining matters relating to this topic is necessary in order to protect the amenities of nearby residents. This would include matters such as method of piling, hours of working and minimisation of dust.
75. Biodiversity. In order to protect flora and fauna it is necessary to impose conditions requiring details of, for example, pond construction and habitat creation; a badger survey and mitigation; and tree protection.

76. Recreation. I agree that the requirement to submit details of children's play space and public open space is reasonable in this case in order to ensure a satisfactory form of development.
77. Highways. Conditions are necessary in order to ensure that access and traffic issues are resolved and highways safety maintained. These include adherence to the submitted access drawing, traffic management, and the approval of a travel plan.
78. Contamination. There is evidence that part of the site has been used in the past for an industrial process. It is therefore necessary to impose a condition requiring a scheme to investigate and mitigate any residual contamination.
79. Archaeology. In order to preserve and/or record any archaeological remains a condition requiring a programme of archaeological work during construction is reasonable and necessary.
80. Energy Use. The Appellants suggested a condition which would require a reduction in energy usage through a 'building fabric first' approach, rather than the requirement to source a percentage of energy from renewable or low carbon sources. This approach would assist in achieving reductions in energy use and I agree that such a condition would be reasonable and necessary.

Disputed and Unnecessary Proposed Conditions

81. I agree with the Appellants that it is not necessary on a development of this scale to impose a condition requiring a design code for the site. As pointed out by the Appellants this is a matter which remains within the reserved matters control. The Council can negotiate a high quality scheme and the suggested condition would not add to the control, but would simply add a further layer of control.
82. Previously imposed conditions in the Borough requiring the provision of 10% of predicted energy to be from renewable or low carbon sources were predicated on a policy of the revoked Regional Strategy. Notwithstanding that such a condition was imposed even when the revocation of the RS was imminent, I agree that its imposition would not now be reasonable. However, I do consider that the requirement for the reduction in energy usage, as a suggested alternative, is reasonable and necessary, as noted above.
83. I have briefly dealt with the matter of alternative car parking provision above. In my judgement it would not be reasonable or necessary to require the provision of car parking spaces as a 'replacement' for on street parking used by those dropping off and collecting children from the nearby school.
84. I am also not persuaded that it is necessary to impose a condition requiring that the public footpath across the site remains open for use at all times. It must remain open by law and any blockage would be unlawful. Action could be taken if any obstruction occurred. The proposed condition is therefore unnecessary.

Planning Obligation

85. A planning Obligation pursuant to S106 of the 1990 Act has been submitted. It has been duly executed. The Obligation deals with the following matters.
 - Public Open Space (POS). POS is to be used for that purpose only, and is to include an equipped children's play area. There is a requirement to prepare a POS management plan and to transfer the POS to a management

company in accordance with the management plan. The illustrative masterplan clearly shows the open space intended to be provided and it would form an important integral part of the development.

- **Highways.** Two contributions are to be made in relation to highway improvements. The first relates to improvements to be made to the junction of Congleton Road and Old Mill Road. The second relates to the junction of Old Mill Road and The Hill, and at the A535/A534 roundabout, and/or to the public highway realm. These contributions would address capacity, safety and flow issues in locations which would be impacted by traffic from the proposed development.
 - **Education.** Contributions are to be made relating to the provision of primary education (to be used within 2 miles of the site) and secondary education (to be used within 3 miles of the site). These contributions would address capacity and facilities issues at local schools which would result from the expected increase in numbers of pupils arising out of the proposed development.
 - **Affordable Housing.** The Obligation requires the identification of 30% of the dwellings as affordable housing units. 35% of those would be intermediate housing units, and 65% either social rented or affordable rented units. This provision accords with Council policy and the advice of the NPPF.
86. I have considered the Obligation in the light of Regulation 122 of the Community Infrastructure Regulations 2010. I am satisfied that each element of the Obligation is necessary to make the development acceptable in planning terms, is directly related to the development, and is fairly and reasonably related in scale and kind to the development. Each part of the Obligation is also justified by reference to Council policy. I can therefore take the Obligation into account in reaching my decision.

Final Conclusion

87. The Council is unable, on my assessment, to demonstrate a 5 year supply of deliverable housing sites. This is a substantial material consideration in favour of the proposal. In addition the affordable housing to be provided is of significant benefit. There is conflict with the development plan as described above, but the harm identified, to landscape, loss of BMV land, and the loss of outlook for local residents do not amount to significant and demonstrable harm which would outweigh the benefits of the scheme. In this instance there are material considerations which outweigh conflict with the development plan. For the reasons given above I conclude that the appeal should be allowed.

Philip Major

INSPECTOR

SCHEDULE OF CONDITIONS

- 1) Details of the appearance, landscaping, layout, and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than three years from the date of this permission.
- 3) The development hereby permitted shall begin not later than two years from the date of approval of the last of the reserved matters to be approved.
- 4) The development hereby approved shall be implemented in accordance with the approved plans unless otherwise agreed in writing with the Local Planning Authority. The approved plans are numbered: 429B.03, 429BA – 05B and 006 – 04.
- 5) No development shall take place until:
 - (a) A Phase II contamination investigation has been carried out in accordance with a scheme to be submitted to and approved in writing by the local planning authority;
 - (b) If the Phase II contamination investigation indicates that remediation is necessary, then a Remediation Statement shall be submitted to the local planning authority for its approval in writing. The remediation scheme in the approved Remediation Statement shall then be carried out.
 - (c) If remediation is required, a Site Completion Report detailing the conclusions and actions taken at each stage of the works, including validation works, shall be submitted to and approved in writing by the local planning authority prior to the first use or occupation of any part of the development hereby approved.
- 6) No development shall take place until a scheme to limit the surface water run-off generated by the proposed development has been submitted to and approved in writing by the local planning authority. The scheme shall indicate the consideration given to the inclusion of a sustainable urban drainage system within the development as part of this surface water run-off strategy. The development shall be carried out in accordance with the approved details.
- 7) No development shall take place until such time as a scheme to manage the risk of flooding from overland flow of surface water has been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.
- 8) No development shall take place until a programme of archaeological work has been implemented in accordance with a written scheme of investigation which has been submitted to and approved in writing by the local planning authority. The work shall be carried out in accordance with the approved scheme.
- 9) No development shall take place until a Construction Method Plan and Statement has been submitted to and approved in writing by the local planning authority. Construction work shall be undertaken in accordance

with the approved Construction Method Statement which shall include the following details:

- (a) Details of the method of any piling used during construction;
- (b) The hours of work which shall not exceed the following:
Construction hours and associated deliveries to the site shall be restricted to 0800 to 1800 Monday to Friday, 0900 to 1400 on Saturdays, with no working on Sundays or Bank Holidays;
Pile driving shall be restricted to 0830 to 1730 Monday to Friday, 0900 to 1300 on Saturdays, with no working on Sundays or Bank Holidays.
- (c) Duration of the pile driving operations (expected starting date and completion date);
- (d) Prior notification to the occupiers of potentially affected properties;
- (e) Details of the responsible person (site manager/office) who can be contacted in the event of a complaint;
- (f) A scheme to minimise dust emissions arising from construction activities on the site. The scheme shall include details of dust suppression measures on site and the methods to monitor dust emissions arising from the development. Dust suppression measures shall be retained in a fully functional condition for the duration of the construction phase;
- (g) The Construction Management Plan (CMP) shall include details (for each phase of the development) of contractors parking areas and compounds and details of wheel washing facilities;
- (h) Details of the fencing to the public rights of way.

Development shall be carried out in accordance with the approved Construction Method Statement.

- 10) No development shall take place until details of a scheme in respect of pond enhancement and habitat creation and enhancement has been submitted to and approved in writing by the local planning authority. The scheme shall include:
- (a) Full details of the enhancement of the pond (in that relevant phase) including sections and landscaping;
 - (b) Details of proposals to enhance opportunities for bio-diversity in the site to include: proposals for the incorporation of features into the scheme suitable for use by breeding birds (including swifts and house sparrows) and roosting bats, and mitigation proposals for any adverse impacts identified following a survey carried out by a suitably qualified person and approved in writing by the local planning authority;
 - (c) A detailed survey to check for nesting birds prior to undertaking any works between 1st March and 31st August in any year. Where nests are found in any building, hedgerow, tree or scrub to be removed (or converted or demolished in the case of buildings), a 4m exclusion zone shall be left around the nest until breeding is

complete. Completion of nesting should be confirmed by a suitably qualified person and a report submitted to the Council;

- (d) A timetable for the implementation of the agreed measures;
- (e) Details of the long-term management and maintenance of these areas within the site.

Thereafter and prior to the commencement of the development a landscape and habitat management plan, including long term design objectives and management responsibilities shall be submitted to and approved in writing by the local planning authority. The management plan shall be implemented as approved and retained thereafter.

- 11) Any and each reserved matters application shall include an up to date badger survey and mitigation proposals for any adverse impacts identified. The survey shall be carried out by a suitably qualified person and approved in writing by the local planning authority. A minimum provision for a 2m buffer zone free from built development shall be retained along the route of the relevant hedgerows within the site. No development shall take place except in complete accordance with the approved mitigation proposals.
- 12) No development, including the setting up of compounds, delivery of materials and access by machinery or plant, shall begin until a Tree Removal Plan and Tree Protection Plan have been submitted to and approved in writing by the local planning authority (hereinafter called the approved protection scheme). The approved protection scheme shall show trees and hedges for removal and retention, and be produced according to BS5837:2012. No tree shall be damaged, felled or pruned other than as expressly permitted by the approved protection scheme. No development or other operations shall take place until tree protection fencing and/or temporary ground protection has been installed according to the approved protection scheme. No access or works will be permitted within a protected area unless they are required in fulfilment of an approved Arboricultural Method Statement. The approved tree protection fencing and/or temporary ground protection shall remain intact for the duration of the development phase and shall not be removed or realigned without the prior written permission of the local planning authority or unless required by an approved Arboricultural Method Statement.
- 13) No development shall take place (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and/or widening or any operations involving the use of motorised vehicles or construction machinery) until a detailed Arboricultural Method Statement has been submitted to and approved in writing by the Local Planning Authority. No development shall take place except in complete accordance with the approved Method Statement. Such Method Statement shall be based on the Tree Removal Plan and Tree Protection Plan according to BS5837:2012 and shall include the following:
 - (a) A specification for tree and hedgerow removal and pruning according to BS3998:2010;
 - (b) A design, specification and methodology for all works that are proposed within a protected area, as defined by the approved Tree Protection Plan and that have the potential to harm any retained

- tree or hedgerow, such that all works can be completed without prejudice to the condition or longevity of any such tree/s or hedgerow;
- (c) Timing and phasing of arboricultural works in relation to the approved development;
 - (d) A schedule of supervision, monitoring and sign-off for proposed pruning, felling, installation of tree protection fencing, installation of temporary ground protection and special construction methods.
- 14) The development hereby permitted shall not be occupied until the access as detailed on Croft Transport Solutions Plan 0006_4 has been constructed in accordance with the approved plan and has been formed and graded to the specification of the local planning authority, which is available from the highway authority, and the visibility splays of 4.5m x 70m have been provided at the main site access in both directions with no obstruction in height above 0.6m.
- 15) No development shall take place until details of a scheme of traffic management/speed reduction measures and on-street parking controls along Congleton Road has been submitted to and approved in writing by the local planning authority. The approved details and measures shall be implemented in full prior to the occupation of the first dwelling on the site.
- 16) Prior to the occupation of each and every phase of the development hereby permitted, a Travel Plan for that phase shall be submitted to and approved in writing by the local planning authority. The Travel Plan shall include, inter alia, a timetable for implementation and provision for monitoring and review. No building within the relevant phase of the development hereby permitted shall be occupied until those parts of the approved Travel Plan that are identified as being capable of implementation have been carried out.
- 17) The reserved matters shall make provision for a minimum total of 3712 sqm of children's play space comprising 2320 sqm of informal play space and a 1392 sqm LEAP with equipment located a minimum of 20m from the closest residential property and with a minimum of 5 pieces of equipment. Full details of the play equipment shall be submitted to the LPA and shall be predominantly of metal construction, as opposed to wood and plastic.
- 18) The reserved matters shall include detailed locations, design and specifications for public open space, and shall be accompanied by the maintenance schedules to be provided pursuant to the Section 106 Agreement and a timetable of implementation and future maintenance. The open spaces and children's play spaces provided pursuant to condition 17 shall be provided in complete accordance with the approved details and timetable (for each phase of the development as relevant).
- 19) The reserved matters shall include details of the boundary treatments to each property within each phase of the development to be approved in writing by the local planning authority. No dwelling hereby permitted shall be occupied until the boundary treatment associated with that property has been implemented in accordance with the approved details.
- 20) The reserved matters shall include details of bin storage for all properties within the phase of development to which the application relates. The

approved storage shall be provided prior to first occupation of the dwellings and shall thereafter be retained.

- 21) The site shall be drained on a separate system with only foul drainage connected into the foul sewer.
- 22) The development hereby permitted shall secure a minimum 10% reduction in energy use through a building fabric first approach (enhanced insulation or construction technologies). A report confirming the achievement of specified design fabric shall be submitted to and agreed in writing by the local planning authority prior to the commencement of development. The development shall be implemented in accordance with the approved details.

Richborough Estates

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Mr R Humphreys	Queens Counsel
He called	
Mr A Fisher BSc(Hons) M.TPI MRTPI	Head of Strategic and Economic Planning, Cheshire East Council

FOR THE APPELLANT:

Mr P Tucker	Queens Counsel
He called	
Mr J Gartland BA BTP MRTPI	Director, Nathaniel Lichfield and Partners
Mrs P Randall BSC(Hons) MALD FLI	Founding Partner, Randall Thorp

INTERESTED PERSONS:

Cllr S Corcoran MA(Oxon) FCA CTA	Local Councillor
Cllr B Moran	Local Councillor
Cllr M Benson	Town Councillor
Mr I Knowlson	Resident and Chairman of the Local Action Group
Mr S Pugh	Congleton Road Action Group
Mr J Keeble	Elworth Hall Action Group
Mr J Minshull	Resident of Wheelock
Mr D Bould	Honorary Alderman of Cheshire
Mr M Kingsley	Resident of Cheshire East
Mr K Halton	Resident of Cheshire East

DOCUMENTS HANDED IN AT THE INQUIRY

From the Council

CEC 1	Letter of notification of the inquiry
CEC 2	Opening statement on behalf of the Council
CEC 3	Settlement Zone Line extract from the CLP Review
CEC 4	Policy PS4 extract from the CLP Review
CEC 5	Land Registry plan showing option land on and adjacent to the appeal site
CEC 6	Copy of objection to the omission of land off Congleton Road from the draft Local Plan strategy
CEC 7	Judgement in <i>Fox Strategic Land and Property Limited and SoS for CLG and CEC</i>

- CEC 8 Household Interim Projections 2011 – 2021, England
- CEC 9 2011-based Interim Household Projections, Quality Report
- CEC 10 Spreadsheet of land with planning permission
- CEC 11 Response to Mr Gartland’s Additional Site Notes on strategic sites
- CEC 12 RS Policy L4
- CEC 13 CEC note on Taylor Wimpey Planning Statement for East Shavington
- CEC 14 CEC note on Housing Market Partnership membership
- CEC 15 Extract from the Inspector’s report into the Congleton Local Plan
- CEC 16 Draft LP Policy SE8
- CEC 17 Drawing of proposed alterations to Old Mill Road/The Hill, Sandbach
- CEC 18 Drawing of proposed improvement to Old Mill Road/Congleton Road junction
- CEC 19 Justification for the S106 highway contributions
- CEC 20 Highways Statement of Common Ground
- CEC 21 Draft list of conditions
- CEC 22 Community Infrastructure Levy Compliance Statement
- CEC 23 Closing statement on behalf of the Council

From the Appellants

- APP 1 Opening submissions on behalf of the Appellants
- APP 2 Committee report relating to land off Hawthorne Drive, Sandbach
- APP 3 Appeal decisions relating to Coppice Way, Handforth
- APP 4 Judgement in *CEC and SoS CLG, Richborough Estates et al*
- APP 5 Judgement in *Wainhomes (SW) Holdings Limited and SoS CLG*
- APP 6 Spreadsheet of strategic sites with Appellants’ comments
- APP 7 Emails relating to comparative analysis of strategic sites
- APP 8 Extract of Proof of Evidence of Mr Fisher relating to land off Coppice Way, Handforth
- APP 9 Opening statement of the LPA relating to proposed development at Tattenhall
- APP 10 Briefing note on agricultural land quality
- APP 11 Copy of letter from the Leader of CEC
- APP 12 Appeal decision relating to Rope Lane, Shavington
- APP 13 Closing submissions for Cheshire West and Chester Council relating to proposed developments at Tattenhall
- APP 14 Note of house builder annual delivery rates
- APP 15 Bundle of briefing notes on strategic sites
- APP 16 Agricultural land classification note, July 2012
- APP 17 Appeal decision relating to Queens Drive, Nantwich
- APP 18 Note of timeline relating to the Queens Drive, Nantwich proposal
- APP 19 Correspondence relating to the Queens Drive, Nantwich proposal
- APP 20 Briefing note on 5 year supply
- APP 21 Spreadsheet with comments on proposed development sites
- APP 22 Table showing 5 year supply calculation
- APP 23 Judgement in *Stratford on Avon District Council and SoS CLG and JS Bloor, Hallam Land Management, RASE*
- APP 24 Draft S106 Obligation
- APP 25 Judgement in *CEC and SoS CLG, Norman Dale, Mildred Dale*
- APP 26 Briefing Note, table and calculations of 5 year supply
- APP 27 Draft agreed conditions
- APP 28 Community Infrastructure Levy note
- APP 29 Closing submissions on behalf of the Appellants
- APP 30 Executed S106 Obligation

From Other Parties

- OP 1 Statement of Cllr Corcoran
- OP 2 Statement of Cllr Moran
- OP 3 Statement of Cllr Benson
- OP 4 Statement of Mr Knowlson
- OP 5 Statement of Mr Pugh
- OP 6 Statement of Mr Minshull
- OP 7 Statement of Mr Bould
- OP 8 Statement of Mr Kingsley
- OP 9 Email from Mr R Doughty
- OP 10 Written statement of MR A Yuille, CPRE Cheshire
- OP 11 Letter from Fiona Bruce MP, read out by Cllr Benson
- OP 12 Letter from Sandbach Town Mayor to the Prime Minister

Richborough Estates