

## Handforth Parish Council representation.

Cheshire East Council Local Plan Strategic Document  
Representation from Handforth Parish Council – Policy PG6 iii, Policy CS30 North Cheshire Growth Village and Policy CS34 Safeguarded Land, Handforth East.

1. Handforth Parish Council was established in May 2011 and represents the people of Handforth. It has seven members from three wards. The Council has met with the Leader and senior spatial planning officer of Cheshire East Council, and most recently responded to the Pre-Submission Core Strategy in December 2013 with a formal letter of objection, adopted unanimously by members. Residents of Handforth have expressed their views in numerous consultations, petitions and questionnaires since late 2012 and have repeatedly expressed an extremely high level of opposition to the "Handforth East" concept.

### Duty to Cooperate

2. The Parish Council are of the opinion that the Plan is not sound because the Duty to Cooperate has not been adequately carried out. In particular, only spasmodic discussions have taken place with Stockport MBC and Manchester City Council. It is a legal requirement that these discussions must begin at the start of the plan making process. It is clear that this has not been the case.

3. The Plan Policies to remove land from the Green Belt at Handforth East were introduced late in the plan preparation process and were not discussed in advance with Stockport MBC or the other Greater Manchester Councils. A joint review of Green Belt in North Cheshire and Stockport should have taken place, but exchanges of correspondence show that this did not happen. Stockport MBC subsequently requested Cheshire East to provide evidence for this policy. This prompted Cheshire East to begin a Green Belt Assessment which did not start until the middle of 2013 and was not completed until September 2013. This Assessment did not consider the suitability of existing Green Belt land for built development and the results have not been discussed with Stockport MBC.

4. No meaningful consultation has taken place between Cheshire East and Stockport MBC and Manchester City Council about traffic and transport issues which would result from the development proposed in Policies CS30 and CS34. This was acknowledged in early 2014 when there was agreement to begin a joint transport study. This will take at least six months and it is not known when it will be complete and what type of schemes that it might propose. In addition, despite Cheshire East being one of the partners in the development of the Manchester Airport to A6 road, no allowance has been made in the design work for additional traffic which would result from the house building proposed in CS30 and CS34.

5. The Parish Council request that the inspector does not allow the Public Examination of the Plan to begin. The Duty to Cooperate in the North of the Local Authority area has not been fulfilled and too many issues remain unresolved. The plan process should be “suspended” until proper consultation has taken place, agreement

reached based on published evidence and substantive resolutions passed by Council Members at all the Local Authorities involved.

## Green Belt

6. The Council supports the “Vision” set out in Paragraph 47 of the Plan, but is perplexed by the identification of the need for a “sustainable” village which is given spatial expression in Policies CS30 and CS34. In particular, the removal of green belt status from these sites and their allocation for built development is not justified by the other policies of the plan or any of the supporting factual information.

7. Cheshire East’s document “Green Belt Assessment, September 2013” considers the land identified in Policies CS30 and CS34 and assesses it in the category “major contribution” (Site reference HFT08). The information set out in this document considers this land under the various categories related to the designation of Green Belt and concludes with the rating in the highest category. The Parish Council agrees with this assessment and does not understand why this area has been allocated for built development rather than any of the areas which are categorised as being of “lesser” Green Belt importance.

8. The proposed boundary of the site lined in red in Policies CS30 and CS34 does not conform to the principles set out in paragraph 85 of the National Planning Policy Framework. Bullet point 6 states that the Green Belt should be defined clearly using physical features that are readily recognisable and likely to be permanent. The implementation of the Policies would result in an outlier of built development within the Green Belt with a small isolated triangle of Green Belt land left in the North West Corner. In addition, the boundary in the East seems to follow the administrative boundary between Cheshire East and Stockport rather than any recognisable physical feature. If there is a need for land to be removed from the Green Belt for housing, then sites adjacent to the existing urban area and associated facilities might be more sustainable and in conformity with the rest of the Plan.

## Exceptional Circumstances

9. Paragraph 83 of the National Planning Policy Framework is the starting point for the consideration of Green Belt land in development plans. It states that once established, Green Belt boundaries should only be altered in exceptional circumstances. The Parish Council do not believe that any of the reasons or justification for Policies CS30 and CS34 should be considered as exceptional circumstances.

10. There is no demographic justification in the Plan for allocating the land described in Policies CS30 and CS34. The natural population change expected in the Handforth area up to 2030 does not justify the scale of house building proposed. It is actually very close to a zero requirement. (Table A 4.3, Background Paper Population Projections and Forecasts). The Plan’s housing requirement is based on a growth strategy with an increased level of net in-migration, but there is no evidence presented of where the additional population will come from or where they will find

employment. Cheshire East Council asserts that there is a “need” for substantial new housing in North Cheshire, but this has not been quantified. None of the information presented in the Background Paper “Population Projections and Forecasts” provides any indication of the spatial distribution of the need for new housing within Cheshire East’s very large area. This means that it is impossible to make any proper assessment of the need for new housing in North Cheshire or the feasibility of accommodating this need, without the need to remove land from the Green Belt. There is, therefore no specific evidence to justify removing land from the Green Belt.

11. In addition, no requests have been made from adjoining Councils to Cheshire East to accommodate any of their housing requirements in this location. In particular, none of the Greater Manchester Councils have indicated any need for Cheshire East to provide housing for the workforce related to any new proposed economic developments in their areas.

12. The Parish Council is also concerned that if additional housing is needed in North Cheshire, then alternative sites outside the Green Belt that could accommodate the scale of housing proposed by Policies CS30 and CS34 have not been examined. The Allocations Plan which will follow this Plan could identify sufficient sites in the area and make an allowance for “windfalls” which would obviate the need for removing the Green Belt designation from CS30 and CS34.

13. In the view of the Parish Council, there are no exceptional circumstances which justify changing the Green Belt boundary in this area.

#### Sustainability

14. Paragraph 84 of the National Planning Policy Framework says that local planning authorities should take account of the need to promote sustainable patterns of development. The Parish Council do not believe that the proposals of Policy CS30 and CS34 would create a sustainable development.

15. The site described in Policies CS30 and CS34 is currently mainly rural in appearance. There is some built development (around 10% of the area), but the majority of the land is either in agricultural use (about 60%) or open (the remaining 30%). It includes many ponds, mature trees, public footpaths and much is currently farmed. It is well used by the public for walking, angling and the flying of model aircraft. It is home to many species of birds, mammals, insects and invertebrates and a large number of different plant species have been identified. These combine to create very special and unusual habitats. Translocation of great crested newts took place onto the site when the A555 was constructed.

16. Within Policy CS30, sub policy g states that “The development should retain important habitats and provide compensatory habitats for great crested newts and other protected species and habitats on the site”. Building on this land would, inevitably, destroy many of the existing habitats or change them so as to make them unrecognisable. For some species, particularly birds, such as the skylark, it would be impossible to retain a suitable habitat. Building on this land would be against all the principles of sustainable development.

17. The land identified in Policies CS30 and CS34 is not within reasonable walking or cycling distance of any major existing significant employment locations or proposals in the Plan for significant employment allocations. This means that all travel to work to major employment locations such as Manchester International Airport, Manchester City Centre or one of the major industrial estates located on the M60 orbital motorway would have to be by car.

18. The land is not currently served by public transport. There are no bus services passing the site at present. There is a railway station in Handforth but the A34 is a significant physical barrier to walking to the station. The West of the CS30 site is nearest to the station and so walking times would increase as development progressed towards the East. There is no off-street car parking at Handforth Station. No costed proposals have been made in the Plan for new public transport links, so it is very likely that the majority of the trips out for all purposes will have to be made by car.

19. Policy CS30 shows road access onto the A34. This road is already extremely congested at peak times. The capacity of the revised junction with the A555 which is to be constructed as part of the A6 to Manchester Airport Road has not included any allowance for traffic which will arise from the construction proposed in CS30. This has been confirmed by Cheshire East Council. Stockport Metropolitan Borough Council has major concerns over this traffic issue and has agreed to carry out a joint transport study with Cheshire East Council. It is clear that the location for development in Policy CS30 is not sustainable and the feasibility and costs of providing both on and off site highway works are yet to be established.

20. The location of the land identified in Policies CS30 and CS34 is not close to any other facilities. It is accepted that small scale local shops and a primary school are proposed for the site, but the costs of these have not been assessed. There are no significant medical facilities, senior schools, local authority offices, libraries and dentists anywhere close to the site in easy travelling distance and none of these are proposed in the Plan. All the trips to these would have to be by car, again demonstrating that development of this site would not be sustainable.

21. Policy SC5 sets out the Plan's approach to the provision of affordable housing. It specifies that in large development at least 30% of the houses should be affordable. If this ratio is applied to the proposals in Policy CS30 then the development would have to include around about 600 affordable homes. There is, currently, a small demand for affordable homes in Handforth, but it is well below the implied figure. This would suggest that Cheshire East is expecting to house a large number of people from outside the Handforth area in the affordable homes to be built as part of the scheme.

22. Occupiers of affordable homes are, by definition, likely to be relatively low earners and less likely to be non car owners. They are likely to have significant problems accessing work opportunities and vital community facilities as they will be reliant on public transport which does not exist at present and has not been assessed as part of the site development costs. It is also probable that affordable housing will generate a lower land price per dwelling than open market housing, so reducing the total value of the site.

23. The Parish Council are also concerned about the physical characteristics of the site proposed in CS30. There is a very high water table as evidenced by the many ponds spread across the site. It is also known that the natural drainage was changed by the construction of the A34 and A555. There are known to be landfill sites in the area, some of which may contain asbestos and other remains beneath the surface of those parts of the site which were formerly “61MU” (a military maintenance depot). Partial reclamation took place many years ago using a “Derelict Land Grant”. The costs associated with dealing with these issues in order to make the land safe for development are not known. It would not, therefore, be sustainable to develop this land.

24. It is clear that there would be many costs involved in developing the land identified in Policy CS30. These will include overcoming poor ground conditions and possible contamination; constructing both on and off site highway works; introducing new public transport services; constructing gas, electricity, water and communications systems; building the facilities specified in Policy CS30; preserving the existing ponds, listed building and landscape features; mitigating for wildlife and habitats preservation; and providing emergency access points. This means that it is impossible to know at this stage if the use of this land for built development is feasible or deliverable. The Parish Council would have expected to see an outline economic assessment of the site in order that it could come to a reasoned opinion about the deliverability of this site in accord with the sustainability policies set out in the Plan.

#### Other Matters

25. The Parish Council are concerned about the cumulative effects of proposed developments in their area. There is an undetermined planning application for 950 houses on the former Woodford Aerodrome and numerous planning applications and proposed allocations in the Wilmslow area. Taken together this level of house building would overload the highway network and put significant pressure on local facilities. The Plan does not consider the cumulative effects of the developments proposed in this part of Cheshire East and no joint working has been carried out across the local authority boundaries to examine this issue more broadly.

26. Whilst not a direct planning consideration, the Parish Council believe that the land proposed for development in Policies CS30 and CS34 has been selected because it is in the ownership of Cheshire east. The concern is that this ownership has influenced the planning process and resulted in the proposal to remove land from the Green Belt to create a capital receipt for Cheshire East Council rather than for good planning reasons.

27. The “Infrastructure Delivery Plan” sets out some of the expenditure which would be required to realise the development of large scale housing on the land identified in Policy CS30. It confirms in Paragraph 7.1 that “very few schemes in the various infrastructure delivery schedules are fully funded” and the attached table shows a funding gap of between £210m and £260m. It is clear that all the costs associated with achieving the development of the land in Policy CS30 would have to be met by the sale of the land and houses on the site. No attempt has been made in the Plan to either cost the infrastructure or estimate the income over the development life of the site or

to explain how the “up front” costs of preparing the land for development would be met. This means that it is impossible to judge if the site is deliverable.

28. The illustrative phasing of development contained in Policy CS30 is considered to be unrealistic. It is very unlikely that 1,000 houses could be built in a five year period at a single location. This would be much higher than is normally achievable. This also seems to be a risky strategy for the Council to pursue. Seeking to concentrate much of the housing allocation at a single location calls into question the robustness of the strategy given the lack of real need for housing from projected population change.

29. It is also not clear how the land identified for future development in Policy CS34 would be accessed. If it is to be through the land identified in Policy CS30, then an adequate spine road would have to be constructed at an additional cost.

30. The Parish Council are also concerned about Policy PG6, iii. This states that Handforth must provide in the order of 10 hectares of employment land and 150 new homes. It is assumed that this is in addition to the development proposed in CS30 and ultimately in CS34. There is no demographic need for extra housing in Handforth as discussed above. In addition, there have been some residential planning permissions granted since the earlier stages of preparation of the Plan representing an expansion of 12.5 per cent of the housing stock. Furthermore, there are very large amounts of unused commercial premises in the industrial estates in the north-east and south of the existing built area of Handforth (in many instances, these offices and warehouses have been empty for years).

31. There are no areas of undeveloped land within the built up area of Handforth. Therefore land to provide even more houses as proposed in PG6 would mean removing other areas from the Green Belt for development. The base date of Policy PG6 is not clear. Handforth Parish Council seek assurance that housing to be built on sites recently given permission contribute to meeting the Policy target of dwellings to be provided and that there will be no proposals in the Allocations Plan for identifying sites for housing in land currently Green Belt.

## Conclusion

32. In the view of Handforth Parish Council, Policies PG6 iii, CS30 and CS34 are not sound. No exceptional circumstances have been established as required by the National Planning Policy Framework for changing the boundary of the Green Belt and the proposed site would not result in sustainable development taking place. The Parish Council requests that Policies PG6 iii, CS30 and CS34 be deleted from the Plan.