

Bollington Civic Society Position Statement Ref: Consultation submission 1222968

Examination of the Cheshire East Local Plan Site Allocations and Development Policies Document

Matter 2 – Planning for Growth

Development at Local Service Centres (Policy PG8)

Policy PG 8

Question 11. Is Policy PG8 consistent with the Strategy in the LPS for growth and the spatial distribution of development by the LSC's, and with the relevant provisions of national policy? In particular.

:Section a) The Local Plan envisioned modest growth for Local Service Centres. In not allocating appropriate housing allocations to each LSC the SADPD has left out a vital element in ensuring that modest growth occurs. Since a specific number of dwellings (3500 up from 2500 in the initial 2014 Plan) was specified for positive planning to be pursued housing numbers per specified LSC should have been agreed to ensure the Plan is achievable.

The creation of the Neighbourhood Plan in Bollington revealed that the Local Plan was being overruled by allocating 390 houses as Bollington's contribution whereas the local assessment of the housing need for modest growth was considered objectively to be 350 houses. Given Bollington's concentration of population at over 4000 people per square kilometre this overallocation with no appropriate concern for constraints such as infrastructure needs shows the Local plan is being ignored and unsustainable housing requirements are being pushed into the SADPD with no justification. Positive Planning has not been carried out effectively to ensure sustainability.

Section b) Neighbourhood Planning has not been considered within the framework of the Local Plan or the SADPD. It appears to be a separate process of negotiation with each Neighbourhood when it decides to have a Neighbourhood Plan. In that sense Positive Planning has not taken place.

Section c) From Bollington's point of view it has been focussed and positively planned because a Neighbourhood plan has been created with a specific number of houses expected. For positive planning to have taken place before the SADPD this process should have been followed with each of the LSC's. Because Bollington has large areas of previous industrial use which became brownfield sites we have been able to absorb a large number of houses and are likely to hit our target of 390 houses which the Neighbourhood Plan process judged to be beyond modest growth and certainly beyond our local needs. This growth insisted on by Cheshire East went totally against statements regarding LSC's e.g. to avoid out commuting. In order to reach that target Neighbourhood Plan Policies have been ignored so open countryside has been built on as well as recreational space. So the position of Bollington civic Society is that positive planning has contradicted the policies and vision set out for LSC's. In the Local plan.

Question 12 From Bollington's experience of the rate of housebuilding so far together with commitments we would expect due to the sacrifice of open countryside and open space to date we would expect to fulfil what has become our quota of 390 houses. At the moment with 8 years to go we have 342 completions plus supply.

Question 13. No position.

Question 14. a) and b) No position.

Safeguarded Land at LSCs (Policy PG12)

Question 15. There has been no detailed justification of allocating safeguarded land to LSCs at this stage of the Planning process given the overall completion and supply figures of 42002 dwellings compared to an indicative figure of 36,000 required for the period 2010 to 2030.

This allocation of safeguarded land emerges from a general consideration of possible need of 200 hectares overall in Cheshire East. There is no stated justified policy for a specific number of hectares.

Bollington worked on its Neighbourhood Plan from 2016 onwards in great detail. It was adopted in 2018 after the Local Plan was adopted. At no time were we asked to consider planning for either land to be taken from the Green Belt for housing as was decided in the First Draft of the SADPD or to allocate land for Safeguarding as we are now asked to do at BOL1 and BOL2. The Neighbourhood Plan was consulted on with the local community and a series of policies stated that the current Green Belt should be protected.

We do not accept that the SADPD is either positive or sound or following the policies of the LPS PG4 as is specified in SADPD PG12 Para 3.

It is not positive in that in Bollington's case the 2 areas of land chosen are to be allocated to housing. This narrow use specified now contradicts directly the policy PG4 of the Local Plan paras 2 and 4 where it is specified development in line with policies for the 'open countryside' will apply unless a review of the Local Plan has taken place.

The safeguarding of BOL1 and BOL 2 is not sound in that special circumstances do not apply. What has been stated relies on assumptions about the future 8 years ahead.

We do not believe Cheshire East planners can prophesy and therefore if special circumstances apply they have to be described in detail relating to facts and circumstances known now. Necessity cannot be derived from speculations as to what might be the case in 8 years time. Before development of safeguarded lands can take place there has to be a review of the Local Plan states PG4 so why not wait for that positive planning action before allocating areas of land into safeguarding?

16. The selection and distribution of sites for safeguarded land is speculative and based on considerations of what might happen in the future and guarantees now the impermanence of the green belt boundaries that need to be permanent.

17. There has been no attention to any details of either the individual impact and therefore how can there be consideration of the cumulative impact of removing BOL 1 and BOL 2 from the Green Belt as safeguarded land together with other sites. The case of BOL 1 is particularly sensitive as part of it has been a site of special biological interest and the Cheshire Wildlife Trust has identified it as an area of habitat distinctiveness and an important wildlife corridor.

18. There has been no positive planning as part of the SADPD to establish individual special circumstances to justify removing proposed safeguarded land in Bollington from the green belt. There has been a general reliance on the fact that after assuming 200 hectares of land were required for safeguarding overall and allocating a portion of that 200 hectares to specific sites the rest could be divided up in convenient small packages in a few Local Service Centres. This cannot be regarded as positive planning. And without significant change to the plan such as removing these sites at this stage from safeguarding and maintaining the current Green Belt boundaries the SADPD cannot be regarded as sound.

Ken Edwards 02/10/2021