

Safeguarded Land at LSCs (Policy PG 12)

15. Is the identification of additional safeguarded land at the LSCs justified to meet the longer-term development requirements of the Borough, taking account of the expectations of the LPS, the potential for the development requirements of Cheshire East beyond 2030 to change under the standard method for calculating local housing need, and the requirement in paragraph 140 of the NPPF that Green Belt boundaries should only be altered where justified by exceptional circumstances?

16. Is the selection and distribution of sites for designation as Safeguarded Land at the LSCs, as set out in the Local Service Centres Safeguarded Land Distribution Report²¹ and the Settlement Reports for Alderley Edge, Bollington, Chelford, Disley, Mobberley and Prestbury²², based on a robust methodology and justified by proportionate evidence and is it consistent with the LPS and national policy?

17. How have the cumulative impacts of the future development of the sites proposed for designation as Safeguarded Land been considered, such as on the highway network, nature conservation assets and the green infrastructure network? What evidence is available to demonstrate this?

18. Have exceptional circumstances for removing each of the eight Safeguarded Land sites from the Green Belt been fully evidenced and justified, and are the sites defined by boundaries using physical features that are recognisable and likely to be permanent?

The overall vision for Local Service Centres in the local plan that “some modest growth in housing and employment will have taken place to meet locally arising needs and priorities to reduce the level of out-commuting and secure their continuing vitality”. During the period 2001 to 2011 Bollington experienced a 10% growth in dwellings and for the present Local Plan period, Bollington is scheduled to experience further growth in the order of 10%. This level of growth clearly satisfies the requirement for more than modest growth and Bollington local needs are being met. NRM (RPD313)

During the previous planning period, Bollington built more houses than the rest of the LSCs, impacting the infrastructure and very linear nature of our town. One of the purposes of the Green Belt listed in the NPPF is to assist in urban regeneration, by encouraging the recycling of derelict and other urban lands. This is precisely what has been happening in Bollington and it is important that the Green Belt should continue to be protected for all the other reasons given in the NPPF. It is particularly important to preserve the character of the Town which has a historic background as a former mill town and which is surrounded by beautiful countryside. It is also important that existing green lungs within the Town are maintained both to contribute to the carbon neutral aims of the community and to provide a gap between the historic separate parts of the Town.

The latest Housing Monitoring Supply figures for March 2021 for Cheshire East show a total projected supply of over 42,000 new homes during the Local Plan period compared to the Local Plan requirement of a minimum of 36,000. The amended Policy PG8 in the Revised Published Draft version of the SADPD has removed the requirement for an allocation of new homes between the Local Service Centres to make up the indicative total of 3,500 given in the Local Plan but Policy PG12 proposes to take a number of Green Belt sites for safeguarding to be considered for development at the end of the current Local Plan period. This figure of 3,500 is not a Policy requirement in the Local Plan but is an indicative requirement towards the overall minimum required of 36,000. The LSCs are already close to reaching a supply figure of 3,500 with 8 years of the Local Plan period remaining. There is clearly no need for further site allocations for numbers of new dwellings to be made in Bollington let alone on Significant Green Belt. The whole plan depends on the generally accepted significantly over predicted economic growth figures initially used by CEC, these predictions of economic growth have not been matched in Bollington in particular.

CEC claim that the exceptional circumstances required to release Green Belt land for safeguarding are derived from the need to allocate sufficient land for market and affordable housing and employment development, combined with the significant adverse consequences of not doing so, particularly because it is not practicable to fully meet the development needs of the area without amending Green Belt boundaries. The CEC attempts to identify sites in Bollington either for development within the Plan period or for Safeguarding, have used the subjective and unsatisfactory Red Amber Green traffic light rating system. The site selection results have changed at each version and there have been inconsistencies in the assessments, particularly with respect to Green Belt ranking.

The Bollington Neighbourhood Plan was passed at a referendum by the Bollington Community on 10th May 2018 and 'made by Cheshire East Council on that same day. The SADPD has largely ignored the wishes of the Community expressed in the Bollington NP and should be revised to be consistent with the Neighbourhood Plan. The following policies in the Neighbourhood Plan have been ignored:

General Policy V1 – The proposed development sites will not meet the sustainable development requirements of this policy.

Housing Policy HO.P1 - No assessment is made in the SADPD proposals to establish the development needs of Bollington or to consider complementary employment and residential uses.

Housing Policy HO.P2 – This Policy expressed support for residential development on brownfield redevelopment sites, suitable small-scale infill sites and suitable windfall sites, as has been happening in Bollington, but stated that development on Green Belt land as designated in 2015 is inappropriate and will only be permitted where covered by very special circumstances of CELP Policy PG3.

Green Belt Policy EGB.P1 – This Policy required retention of the definition, and where possible, separation of the historic separate communities of Bollington. Site BOL1 provides a key green lung in providing separation between Bollington Cross, Lowerhouse and Bollington.

Natural Environment Policy ENE.P1 – In the survey by Cheshire Wild Life Trust for the Neighbourhood Plan, the whole of site BOL1 was assessed as being a wildlife corridor and having medium habitat distinctiveness with high distinctiveness in the northern part.

Moving Around Policy MA.P1 - The sites included in the SADPD proposals will exacerbate traffic and safety problems already the subject of great concern to Bollington residents.

Summary of responses to Questions 15-18.

NRM and Save Bollington Green Belt responses to these questions from the Inspector are as follows:

15. The identification of additional safeguarded land in the LSCs is completely unnecessary, unjustified and in legal error. Bearing in mind the current substantial projected oversupply of new homes at the end of the Local Plan period, the reduced numbers from the latest Government method for calculating local housing need and the safeguarded land already taken in Policy PG4 of the Local Plan, exceptional circumstances for removing further Green Belt cannot be justified.

16. The methodology for the selection and distribution of safeguarded sites in the LSCs is completely unsatisfactory. It is based purely on dividing up an assumed residual allocation of 13.6 ha, which is itself unnecessary and unjustified, using methods that are based on subjective judgements not involving local community involvement.

CEC try to select sites put forward by persistent speculative developers to share this 13.6 hectares using an unsound traffic light system with arbitrary weighting despite strong opposition to both methods and the development of these sites expressed by a very large number of residents of Bollington. NRM (RPD315)

17. There has been no consideration of the cumulative impact of future development of proposed Safeguarded Land on nature conservation and green infrastructure. Information on these aspects in the Bollington Neighbourhood Plan has been completely ignored. No account has been taken of the value of the Green Belt sites in Bollington as green lungs separating historic local communities despite this being made clear to CEC on several occasions.

In addition, there has been no consultation with the community over the proposed sites for the release of the Green Belt in Bollington and the community objected strongly in the last consultation that sites BOL1 and BOL2 were unsuitable for development. For example, site BOL1 at Hall Hill / Henshall Road has major access problems and is heavily contaminated with chemicals in rusted drums to a depth of up to 3 metres but having been undisturbed for 40 years has become an important site for habitat distinctiveness as shown in the Neighbourhood Plan, with badgers, foxes, buzzards, owls, bats, frogs, dragonflies, day-flying moths, and diverse entomology in evidence. Furthermore, the site has a major drainage culvert beneath it, United Utilities expressed a preference to use other sites. In the recent heavy floods, Bollington was significantly adversely affected and building on this site would lead to more rapid runoff of water down the hill to increase the risk of flooding in the houses and schools below which have already suffered flood damage in the recent past. In addition, it forms an important natural green gap between the original historical parts of Bollington and is situated on the edge of the proposed Conservation Area incorporating Bollington Cross and Lowerhouse. Site BOL2 will adversely affect the Kerridge Conservation Area, has a sewer across it, potential contamination and access problems.' NRM (RPD316),

Published by Natural England: Research Report NERR043,P5, Grasslands and Carbon: 'Grasslands soils have the highest carbon stock of any UK broad habitat'. Boll1 is rough grassland undisturbed for 40 years. When you compare the biodiversity of Boll1 with surrounding farmed greenbelt land the biodiversity is palpable.

Site BOL1 is unsuitable for housing development as it is not compatible with sustainable development for the following reasons:

'a) it is a Green Belt site and CEC are clearly in legal error in proposing to release this site from the Green Belt for safeguarding as they have not satisfied the requirements of NPPF paras 136/137 to demonstrate exceptional circumstances and they have not considered alternative options.

(b) It is heavily contaminated with industrial chemicals and rotting storage drums due to the tipping of waste by Bollington Printing Works up to 1980.

(c) Boll1 has become an important site for habitat distinctiveness as shown in the Bollington Neighbourhood Plan study by Cheshire Wildlife Trust which defines its importance.'

NRM (RPD 317)

18. In the case of the two Green Belt sites proposed for safeguarding in Bollington, exceptional circumstances have not been evidenced and justified. In the case of site BOL1, there is no physical boundary on the north side of the site.