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17<sup>th</sup> October 2018

Dear Adrian

### Response to Consultation on Cheshire East Council SADPD Draft Proposals

On behalf of Bollington Town Council, I refer to the meeting with Adrian Fisher, Head of Planning Strategy, on 15<sup>th</sup> October; the extra-ordinary meeting of the Town Council which followed it and the very well attended public meeting in Bollington on 3<sup>rd</sup> October which preceded it. These meetings were all concerned with the Site Allocations and Development Policies Document (SADPD) Draft Proposals and how they affect Bollington.

The Town Council notes the considerable effort that has been put into the preparation of the SADPD Draft Proposals, however, Bollington Town Council and our community consider the proposals to be fundamentally flawed. They fail to comply with the National Planning Policy Framework or even with the Cheshire East Council (CEC) Local Plan Strategy.

Also, the on-line consultation response procedure is very complex and difficult to use for those not fully computer proficient which only serves to limit responses. The Town Council has had many local people expressing this opinion and we have acted where possible as a conduit to ensure that they can respond. Please ensure that the letters we have forwarded from them are considered as part of this consultation.

The Town Council's response will be via this letter and via the Portal. However, many of our residents will write and email and I hope that all these will be given the detailed scrutiny they deserve for this very important consultation.

The Town Council's detailed comments are below:

#### **The defective approach to the allocation of 3500 between the 13 Local Service Centres (LSCs)**

The SADPD proposals are based entirely on how to divide up the figure of 3,500 allocation of dwellings between the Local Service Centres (LSCs) for the full Local Plan period. The Town Council feels that they have been developed in a desk-top environment, remote from the communities involved, by a team without full detailed

knowledge of the areas concerned. No attempt has been made to plan for the future needs of the individual LSCs and the thrust of Bollington's adopted Neighbourhood Plan, developed with the full participation of the community, has been largely ignored.

The only sites considered in the SADPD are those submitted by the vested interests of developers or agents with little or no concern for the needs of our community. The Town Council expected to be fully involved in this allocation process but has been consigned to the very fringes and is now confronted with a document which, although in draft form, may be difficult to change. There has, in the Town Council's view, been judgements made regarding the appropriate numbers of dwellings for the needs of each LSC and about the optimum location to support sustainable development of the community which require much closer attention.

Supporting documents FD03 and FD05 describe the approaches considered for disaggregation of the overall target of 3,500 dwellings between the LSCs. All six of the numerical approaches consider only arbitrary individual factors, each of which alone would be unsuitable. Basing numbers on scaling up existing proportions of population or dwellings is not logical on its own as it takes no account of the ability of the area to absorb further development or of the needs of the community. The approach based on available facilities is also arbitrary because there is no distinction in weighting between the limited choice of facilities considered.

The effect of constraints in accordance with the NPPF and Local Plan policies should be seen as a major consideration but is effectively ignored in the SADPD proposals. Similarly, the Green Belt option is meaningless because it effectively takes existing commitments plus non-Green Belt sites and then ignores the brown field sites making up the balance in its final recommendations.

The option based on proportion of sites submitted has again been largely ignored and this option should have been explored further with the relevant Councils and community organisations for each LSC to establish properly the potential for the needs of each LSC.

There is no basis for the seventh option (a blended approach) which has been adopted. It bears no resemblance or logical connection to any of the other options considered. The model, therefore, in the Town Council's view has no clear validity and any numbers generated could not bear close scrutiny.

It is unacceptable to allocate 400 homes to Bollington when there are already 318 commitments eight years into the twenty-year Plan period, and when the draft allocations to Prestbury are 130 homes, Chelford 235 homes, Alderley Edge 250 homes and Disley 255 homes for the whole Plan period. Despite the deficiencies of relying only on sites submitted in response to the call for sites, significantly larger numbers of potential sites have been submitted in LSCs other than Bollington, which have lower levels of constraint including Green Belt category than Bollington. In some cases, comments have been submitted in connection with other LSCs expressing the view that they need a higher level of development. Also, in terms of the LSCs of Mobberley and Goostrey these sites are severely constrained by Airport Noise contours and Jodrell Bank respectively and should not have been included in "sharing" the 3500 dwellings. This has effectively meant sharing between 11 LSCs. That was an oversight by Cheshire East which could have been foreseen.

No account has been taken of the existing housing density figures in the LSCs – Bollington has the highest housing density based on 2011 census figures at 5.92 dwellings/ha, whereas Prestbury has a housing density of 1.24 dwellings/ha, Chelford 1.16 dwellings/ha and Alderley Edge 5.83 dwellings/ha. Why are those settlements with the highest density being required to take more housing?

In view of this The Town Council feels that a more appropriate allocation for Bollington would be between 330 - 350 dwellings, which with 318 approved and built would leave between 12 and 32 to build before 2030

### **Issues with the Proposed Release of Green Belt**

The Cheshire East Local Plan Strategy does state that small scale alterations to the Green Belt may be required in LSCs in some circumstances to accommodate some modest growth in housing and employment to meet locally arising needs and priorities. This would be to reduce the level of out-commuting and to secure their continuing vitality. However, this must be subject to the overriding requirements of the National Planning Policy Framework and other Policies in the Cheshire East Local Plan Strategy itself.

Bollington has already had more than modest growth during the present Cheshire East Local Plan period.

The National Planning Policy Framework (NPPF) and the CEC Local plan stipulate that release of Green Belt requires “Exceptional Circumstances”. The 2018 revision of the NPPF, para 137, states that before concluding that exceptional circumstances exist to justify changes to the Green Belt, the strategic policy making authority should be able to demonstrate that it has examined fully all reasonable options for meeting its identified need for development. The SADPD has clearly failed completely to do this as it has not demonstrated any “Exceptional Circumstances” and has not explored properly options to allocate alternative sites in other LSCs. The SADPD claims that the exceptional circumstances in Bollington are the need to allocate sufficient land for development and the significant adverse consequences of not doing so. The figure of 400 houses and net result of 82\* (\*rounded down to 79 when allocated to the four proposed Green Belt sites) for Bollington have not been justified. There are no adverse consequences in not releasing Green Belt – indeed the adverse consequences are in releasing Green Belt.

### **Failure to observe the Bollington Neighbourhood Plan**

The Bollington Neighbourhood Plan was passed at referendum by the Bollington Community on 10<sup>th</sup> 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 points apply:

#### **General Policy V1**

*In Bollington development is considered sustainable where it contributes positively to:*

- *the amenity, health and safety of existing and future residents*
- *the design, historic and cultural integrity of the Town*
- *the landscape or townscape and the natural environment*
- *the maintenance of stable levels of employment and potential economic growth*

*Development will be supported where the overall effect is a positive contribution to these attributes with no significantly unacceptable effect on any of them.*

The sites proposed for development in Bollington will not contribute positively to any of these bullet points for sustainable development and there would be an unacceptable effect on the amenity, health and safety, on the landscape and natural environment.

### ***Housing Policy HO.P1***

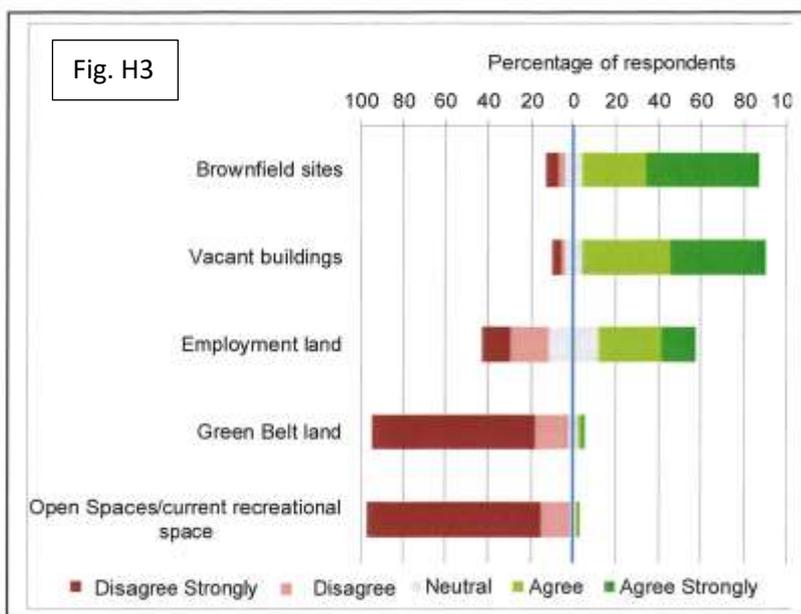
*Residential development will be supported to deliver new dwellings to meet the development needs of Bollington over the Plan period. Development sites should be sited within or adjacent to the settlement boundary and, where possible and appropriate, should achieve a mixed scheme of complementary employment and residential uses.*

No assessment is made in the SADPD proposals to establish the development needs of Bollington or to consider complementary employment and residential uses. The only assessment of the housing needs of Bollington was made in a supporting document to the Neighbourhood Plan. At the time this suggested a figure of 400 houses would meet the needs, based on Office of National Statistics predictions of future population and assuming that ~70 houses under construction at East Tytherington, within the Bollington boundary, would contribute to both needs and supply of housing in Bollington – CEC has repeatedly refused to accept these houses as being in Bollington. The assessment included allowance for an 8% contingency then required by CEC. This contingency has been withdrawn and the ONS predictions have recently been revised downwards. The NP assessment of future needs has been revisited and now finds a figure of 330 to 350 houses more than adequate for future requirements, including allowance for an ageing population.

### ***Housing Policy HO.P2 includes the following clauses:***

1. *Residential development will be supported at the following locations:*
  - *Brownfield redevelopment sites*
  - *Suitable small-scale infill sites*
  - *Suitable windfall sites**in conjunction with Policies of this Plan concerned with employment.*
2. *Development on Green Belt land as designated in 2015 is inappropriate and will only be permitted where covered by very special circumstances of Cheshire East Local Plan Policy PG3.*
3. *Proposals for new development within the settlement boundary will be supported where:*
  - a) *They meet the needs of Bollington,*
  - b) *They are of an appropriate size and scale to the settlement,*
  - c) *They employ a design and layout which integrates successfully with the existing development pattern and scale of the Town,*
  - d) *Subject to viability and site constraints, mixed uses can be successfully achieved and*
  - e) *Required levels of parking and public open space can be delivered.....*

The SADPD proposals do not take any account of these Policy requirements. Figure H3 (see overleaf) in the Bollington NP showed unambiguously the wishes of the Community in response to a full Questionnaire survey – this has been ignored in the SADPD proposals.



As shown in Figure H3 the responses to Question 15 of the Questionnaire showed that there is overwhelming opposition to any new development in the Green Belt as designated at the time of the Questionnaire, favouring development on Brownfield sites where mature expansion had already been established. Open Spaces, similarly, were expected to be protected from development as shown clearly from those responses received.

**Housing Policy HO.P3 Type of Housing includes the following clauses:**

1. Residential development should provide a mix of homes to create a balanced Community.
2. Proposals which demonstrably make a positive contribution to meeting the housing needs of an ageing population will be supported, including homes for down-sizing, as well as residential or nursing care.
3. In locations with ease of access to one of the shopping clusters (identified on Figure R1), proposals will be supported which deliver a mix of homes suitable for the elderly, infirm and disabled.

**Housing Policy HO.P4 Design of Housing includes the following clauses:**

1. New dwellings will be supported which:
  - Contribute positively to the immediate setting, adjacent buildings and overall townscape; and
  - Are in keeping with the urban form and settlement pattern of Bollington.
2. Proposals for new dwellings will be supported which:
  - (a) Enhance the urban form and settlement pattern of Bollington
  - (b) Establish a housing density compatible with the general nature of Bollington and the immediate locality of the site.
  - (c) Incorporate traditional materials and details appropriate for Bollington
  - (d) Ensure new layouts create views to local landmarks from within the scheme where possible (local landmarks are identified on Figure BE3, page 36).
  - (e) Seek opportunities to create distinct, safe residential locations that deliver innovative design and layout .....

There is no consideration in the SADPD proposals of the types or design of housing needed in Bollington. Whilst it may be said that the SADPD is concerned only with allocation of sites, it is necessary to consider whether the sites proposed are suitable for the needs stated in these two Bollington NP Policies. In recent times Bollington has experienced a number of unsuitable developments allowed by the Planning Authority, against the wishes of the Community. Both site allocation and planning approval must take full and proper account of the NP Policies and the current SADPD proposals do not give any confidence that this is understood and accepted.

### **Green Belt Policy EGB.P1 – Development within Released Green Belt Land**

*If any sites have been released for development their master planning and design must:*

- i) Seek to replicate features of the existing settlement pattern that knit the urban edge into the countryside (including consideration of access)*
- ii) Retain definition, and where possible, separation of Bollington's separate communities (Bollington, Bollington Cross, Lowerhouse, and Kerridge).*

*Such separation will be achieved through the application of 'green fingers' and 'green wedges' within the site layout, which may be appropriately incorporated as open/recreation space as part of the development itself.*

#### **6.4.3.1 Justification**

- *The overall Strategic Policy for the Green Belt is covered by CELPS Policy PG 3.*
- *To maintain the integrity of the Bollington Community including the distinctiveness of Bollington, Bollington Cross, Lowerhouse and Kerridge;*
- *To protect our landscape settings for our heritage assets supporting our status as an 'Historic Town', as identified in the Arup report on the Green Belt [16]; and*
- *To ensure any development improves amenity for the Bollington Community.*
- *To protect the openness and landscape value of the Green Belt, and*
- *To ensure any development in the Green Belt is supportive of Bollington's Conservation Areas and does not compromise Bollington's industrial heritage.*

The SADPD proposals fail to respect the wishes of the Community expressed in this Policy and Justification.

### **Natural Environment Policy ENE.P1 – Natural Environment Policy**

- 1. Development proposals which are likely to have a significant adverse impact on a local wildlife corridor or wildlife habitat will not be permitted except where the reasons for or the benefits of the proposed development outweigh the impact of the development.*
- 2. Development will only be supported where there has been a survey to ascertain impact on identified wildlife corridors and wildlife habitats as shown on the Cheshire Wildlife Trust Report (August 2015) [13] and any adverse impacts effectively ameliorated.*

### **Natural Environment Policy ENE.P2 - Maintenance of Views**

- 1. Development proposals within the Peak Park Fringe which would adversely affect the setting of the Peak District National Park will not be supported.*
- 2. Development which would significantly adversely affect views of Nab Head and White Nancy will not be supported*

Comments on the failure of the SADPD to implement these Policies are made in the Sections below on Specific Sites.

### **Moving Around Policy MA.P1 – Improve safety and Efficiency of Moving Around include:**

- 1. New roads must be safe for all means of transport, with appropriate pedestrian access by new footpaths and footways which should be integrated safely with existing pedestrian routes.*
- 2. Bicycle use should be encouraged by the provision of adequate bike racks and cycle lanes where appropriate and practical.*

*3. Development must maintain and improve the safety of users, residents and pedestrians around existing roads.*

The sites included in the SADPD proposals will exacerbate traffic and safety problems already the subject of great concern to Bollington residents. Specific comments are made under each site below.

### **Comments on Proposals for Specific Sites in Bollington**

In addition to the general comments made above, the following comments are made about the specific sites considered in the proposals, detailed in supporting document FD24. The traffic light assessments of the suitability of the four sites proposed to be released from the Green Belt are all flawed or contain inaccuracies. In all cases insufficient weight is given to highways and congestion, landscape impact and environmental/ecology issues and to the strains on the current infrastructure. It should be noted that a Public Meeting was held in Bollington on 3<sup>rd</sup> October 2018 to explain and discuss the SADPD proposals to the Community.

The meeting was attended by about 130 persons despite very short notice and limited publicity – very strong concern and opposition to the SADPD proposals was expressed by all contributing to the meeting.

#### ***CFS 278 Clough Bank***

The only brownfield site considered in the SADPD for Bollington is CFS 278, Clough Bank, which is generally known locally as the BC Transport site, although there are other employment organisations on the site.

This is dismissed from further consideration by CEC as it says no firm proposals for relocation by the owners have been received. However, this must be subject to further investigation by both CEC and Bollington Town Council (BTC) as a matter of great urgency.

The site was submitted in the SADPD call for sites and hence it is clear that its future is under consideration. In December 2017, the firm BC Transport was sold to a large national haulier, Kinaxia Logistics, who currently own a total of nine companies, including BC Transport and William Kirk Ltd., who are based on the nearby Adlington Trading Estate with much better access to main roads. Kinaxia state on their website that they were founded in 2012 and seek to continue to grow. It is obvious that such a company will seek to obtain the highest efficiency and will look for opportunities to rationalise its operations. The company has indicated that it will seek to move the BC Transport operation to a more convenient location and hence the site owners will seek to dispose of the site within the remaining period of the Local Plan.

If this happens, there will undoubtedly be pressure for part of the site to be sold for housing developments and if this happens at a later stage it will mean additional housing in Bollington to that currently suggested in the SADPD resulting in over development and further pressure on the infrastructure and congestion in the Town.

It is essential that CEC/BTC hold discussions with Kinaxia, the site owners and their planning advisers to establish their intentions over the next 12 years. It should also be noted that the Neighbourhood Plan will require “no net loss of employment numbers” and a mixed-use approach to developing the land but this should not be difficult on this large site.

### ***CFS 567 Site at end of Greenfield Road – 9 dwellings***

This site has been the subject of repeated pressure from the owner for release from the Green Belt for some years. It does constitute rounding off, however, the Neighbourhood Plan is firm on its position of not developing the Green Belt except under exceptional circumstances and that brownfield sites should be able to accommodate Bollington's needs within the Plan period. In the traffic light assessment, item 16 (Greenfield) is ranked red, items 2, 6, 11 and 13 are ranked amber and all other items green. There is also doubt about suitable access to this site and opposition from local residents to the potential additional congestion that would be caused on Greenfield Road.

### ***CFS 79/80 - Site behind 41a Shrigley Road – 15 dwellings***

The site behind 41a Shrigley Road lies in the Peak Park Fringe and was assessed in the Arup Green Belt Review as part of parcel BT01 and graded as making a major contribution to the Green Belt. It is unacceptable that CEC should seek to peel off a part of a site assessed by independent consultants and revise the grading downwards to suit an unjustified housing allocation. This site is at the northern end of Bollington and any development here will lead to increased traffic flow through the length of the Town.

### ***CFS 561 - Site at Henshall Road end of Hall Hill – 40 dwellings***

In the case of the two sites at Hall Hill, in addition to the general points about Green Belt, Landscape and Environment issues, there are drainage pipes/culverts under the sites and United Utilities have stated that they would prefer development to take place on other sites. In the traffic light assessment for CFS 561, items 16 (Greenfield) and 18 (Contamination) are ranked red, items 2, 8, 10, 11, 13 and 17 are ranked amber and all other items green. The ranking of items 6 and 7 on highway issues as green is strongly contested – the addition of 40 houses with say 2 cars/house exiting onto the main B5090 road with restricted sight lines on a bend will exacerbate traffic safety and congestion.

The site is heavily contaminated with chemicals and rusting drums from its previous use for tipping by Bollington Print Works up to about 1980. There is persistent local flooding on the north east side adjacent to Springbank. In the survey by Cheshire Wild Life Trust for the Neighbourhood Plan, the whole of the site was assessed as being a wild life corridor and having medium habitat distinctiveness with high distinctiveness in the northern part. Animals such as badgers, foxes and bats are frequently seen in the area.

No account is taken of the Neighbourhood Plan findings concerning this piece of land as a separator between the historic communities of Bollington Cross, Bollington and Lowerhouse or of the results of the Questionnaire in which over 70% of respondents considered it very important, important or were neutral that this site was an important open space and over 65% of respondents disagreed strongly, disagreed or were neutral that development should be permitted on this area.

It should be noted that this site was included in the 2013 SHLAA considerations and was ranked as unsuitable, not achievable and not developable though available. It should also be noted that a public meeting was held at Bollington Cross School on 17<sup>th</sup> May 2016 at which the owner's agent presented plans for developing this site with 36 bungalows. The meeting was attended by about 80 persons and there was total opposition to the proposals by those present.

The natural boundary for any useable part of this site (for community or other use) is a line between the corner of the Hall Hill housing estate and the southern side of the

turning head at the end of Springbank at No. 28 Springbank. The strip of land between the site and Springbank is privately owned and there is no possibility of access to this site from Springbank.

**C352a - Site at Ashbrook Road end of Hall Hill – 15 dwellings.**

In the traffic light assessment, items 16 (Greenfield) and 18 (Contamination) are ranked red, items 2, 3, 10, 11, 13 and 17 are ranked amber and all other items green. The general remarks made about site CFS561 (Henshall Road)) still apply largely to this reduced site.

The conclusion of a green response to items 6 and 7 on highway issues in the traffic light assessment is strongly contested. The response to item 7 that there are no known issues with a development of 10 dwellings on this site is in conflict with the proposed allocation of 15 dwellings. The junction of Ashbrook Road and Henshall Road is highly dangerous and any additional traffic on Ashbrook Road would aggravate both this and the junctions with Springbank and West Close.

The natural boundary for any useable part of this site (for community or other use) is a line between the corners of the Greg Avenue and Springbank housing estates. The wooded close to the west of this line is part of a wild life corridor having medium habitat distinctiveness with some high distinctiveness. Animals such as badgers, foxes and bats are frequently seen in the area.

The Town Council would like to repeat and underline its conclusion, as articulated clearly within the Neighbourhood Plan, that there will be ample opportunity to meet its housing needs from brownfield sites within the Plan period.

**Concluding Remarks**

The Town Council and the Community it serves, therefore object to the SADPD draft proposals in their current form for Bollington.

We hope that Cheshire East Council will recognise the detailed analysis that we and our community have given to these draft proposals and request that changes are made and are fully reflected in the submission version of the document which will follow this consultation.

Could we also request that we have the opportunity to discuss and agree appropriate changes to SADPD Draft before it becomes the submission version.

Yours sincerely



David Naylor  
Town Clerk  
On behalf of Bollington Town Council  
and its Community

Copy to Spatial Planning (Westfields) c/o Municipal Buildings Crewe CW1 2BJ