

Cheshire East Local Plan

Strategy Document

Public Stage Representation Form

Representation Form Part A: Personal Details

	1. Personal Details	2. Agent's Details
Title	Ms	
First name	Evelyn	
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Reference Number	Woodford Neighbourhood Forum Chairman: Stephen Taylor 791430	

Representation Form Part B: Representations 1 and 2

Name and Organisation	Evelyn Frearson on behalf of Woodford Neighbourhood Forum (as Honorary Secretary)		

3. To which document does this representation relate?

Local Plan Strategy <input checked="" type="checkbox"/>	Habitats Regulations Assessment
Sustainability Appraisal	Policies Map

4. To which part of the document does this representation relate?

Policy:	Site:	Strategic Location:	Paragraph: 1.25 to 1.29
Figure:	Table:	Vision Box:	Strategic priority:

5. Do you consider the Local Plan Strategy is:

Legally Compliant	Yes	No <input checked="" type="checkbox"/>
Sound	Yes	No <input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	Yes	No <input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan Strategy is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Strategy or its compliance with the duty to co-operate, please also use this box to set out your comments.

Representations 1 and 2

Members of the Forum are concerned about the potential cumulative impact of three sites which between them could accommodate many thousands of houses in an area currently protected by national and Development Plan Green Belt policies. We have estimated that over 3000 new houses could be constructed within a 2 km radius of Woodford Village Church.

Site 1 Former British Aerospace site in Stockport Borough

The local communities of Woodford, Poynton, Adlington and adjoining areas have been working together over the last three years since 2011 when British Aerospace vacated the adjacent former aerodrome site comprised of a large aerospace plant, runways and associated land. Local residents will all be affected by the redevelopment of Woodford Aerodrome because of the scale and size of the site. Local residents accept that the re-use, conversion and selective redevelopment of the brownfield parts of the site containing existing buildings should take place. The majority of the site is open land forming the runway, apron areas and associated land and is protected by national Green Belt policy.

In autumn 2013, the new owners of the aerodrome site (Harrow Estates) submitted

planning applications for the redevelopment of the Stockport part of the former aerodrome into a housing development and associated facilities of up to 1000 houses. At the time of this representation, Stockport Council has not determined these applications and Harrow Estates have not exercised their right of appeal against the failure to determine. Members of the Forum have recently been advised by one of their local councillors that the applications are now due to be considered by the Stockport Borough Council in June 2014.

The Forum has made strong representations against the applications as submitted on the following grounds. The Forum considers the planning applications seek to disregard the history and character of the Woodford area, and also disregard established planning policy for the area as set out in the Development Plan by proposing a housing development of around 1000 houses, solely within the Stockport part of the site boundary. This size and scale of development would triple the size of the existing Woodford village. Furthermore, the information presented with the hybrid application is misleading and contradicts the Development Plan and the Council's own Supplementary Planning Document for the site. For example, the Planning Statement accompanying the applications refers to only two policies for the Green Belt contained in the Saved Policies of the Unitary Development Plan (May 2006) as being relevant to this, whereas there are five policies.

Site 2 Former British Aerospace site in Cheshire East

There is a third area at risk of development which is the remaining eastern half of the former aerodrome lying within Cheshire East. This too is now understood to be owned by Harrow Estates. This site too lies subject to national and Development Plan policies for the Green Belt. However, as a former aerodrome and owned by a housing development company, the Forum fully anticipates that at some stage within the next few years proposals to take this land also out of the Green Belt and commit it to housing development will come forward. This could be via a variety of planning tools, particularly if the process of taking land out of Green Belt for housing development is supported by either or both local planning authorities through the grant of planning permission on the Stockport side of the aerodrome and the release of Green Belt land for housing on the Cheshire East side through this current Local Plan process. Furthermore, it is to be noted that neither local planning authorities have progressed their Site Allocations Plans to any advanced stage which could provide yet another route to housing development on the former aerodrome on either or both sides of the Borough boundary.

Site 3 Release of land in Handforth in the Cheshire East Local Plan

Sites CS30 and CS34 in the Cheshire East Council (CEC) Local Plan for the proposed North Cheshire Growth Village and Safeguarded Land, respectively, are directly adjacent to the western boundary of the Woodford Neighbourhood Area. Much of this representation is concerned with raising objections to the proposals for Handforth.

Soundness and the Duty to Co-operate

The Forum has considered the extent to which the Cheshire East Local Plan complies with the Duty to Co-operate under the relevant statutory provisions. The Forum considers the Local Plan Strategy to have failed the test of soundness as set out in paragraph 182 of the National Planning Policy Framework as shall be demonstrated in respect of policies PG 1, PG3 sections 5 to 8 inclusive, PG4 and CS 30 and CS 34.

It is our considered view that the Plan Strategy fails to comply with the Duty to Co-operate insofar as it is inconsistent in its consideration of the adjacent local authorities lying to the north of Cheshire East Council, namely High Peak in Derbyshire, Trafford, Manchester City and Stockport Boroughs within Greater Manchester. On the one hand, it seeks to accommodate the housing needs of one adjacent Borough to the north east and east in

Derbyshire (High Peak). On the other hand, the strategy fails to acknowledge that much of the demand for housing in the northern parts of the Borough may come from beyond the administrative boundaries of Cheshire and be generated instead from the internal needs of Trafford, Stockport and Manchester which those Councils themselves may be seeking to retain for their own regeneration and renewal. Neither does the Plan confirm or otherwise whether those adjacent metropolitan authorities are requiring land in Cheshire East to accommodate their needs if they cannot meet them internally.

Furthermore, with regard to the provision of infrastructure to support the large scale release of Green Belt land for new employment and housing land in the northern towns of Cheshire East, the Local Plan documents fail to provide the necessary evidence of cross-boundary planning of services and amenities needed to support this growth in housing and jobs. We would refer to the lack of consideration of the transport and other connectivity implications of the amount of development planned in North Cheshire in this plan. The three authorities of Manchester, Stockport and Cheshire East have recently granted planning permission during early 2014 for major improvements to the highway network between the A6 and Manchester Airport. However, no consideration appears to have been given to the potential impact on the new proposed highway network of all the new developments planned in the North Cheshire area in this Plan amounting to up to 3000 new homes plus additional employment land.

7. Please set out what modification(s) you consider necessary to make the Local Plan Strategy legally compliant or sound, having regard to the test you have determined at 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recommendation 1

The Forum requests the Inspector to recommend non-adoption of the Local Plan on the grounds of its failure to co-operate in respect of two related matters: the failure to agree an appropriate spatial distribution of new housing and employment land to meet the needs of the North Cheshire area and any adjacent parts of Greater Manchester and the consequential inadequate arrangements and planning for appropriate infrastructure to support this expanded demand for facilities and amenities from residents and workers.

Recommendation 2

The Forum requests the Inspector to conclude that the Local Plan is unsound as development and infrastructure have not been planned together or positively prepared.

8. If your representation is seeking a modification do you consider it necessary to participate at the oral part of the examination

Yes ✓

No

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Woodford Neighbourhood Forum wishes to have a representative participate at the oral part of the examination because of the following context:

Context

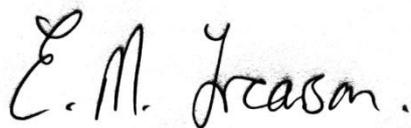
Woodford Neighbourhood Forum (WNF) was designated by Stockport Metropolitan Borough Council (SMBC) in September 2013. The historical parish boundary delineates the Neighbourhood Area (with the exclusion of land incorporated in development plans for the A6-Manchester link Road Scheme and the former Woodford Aerodrome Site). The whole of Woodford currently lies within the Greater Manchester Green Belt within Stockport Borough and this is contiguous with the adjoining areas on the Cheshire East side of the boundary subject to the North Cheshire Green Belt. The people and businesses of Woodford are in the middle area between a proposed housing redevelopment of up to 1000 houses on the Stockport side (the subject of a current planning application by a housing development company) and the proposed release of Green Belt land for major development on the Cheshire East side at Handforth and further areas of Wilmslow beyond. The cumulative impact of these proposed developments would completely change the character of this area. It would become wholly residential rather than its predominant characteristic at the moment which is its openness between the adjacent settlements. It therefore fulfils one of the essential purposes of national Green Belt policy which would be lost by the planned developments proceeding to construction. In addition, all local services and facilities would be impacted by the plan, particularly with regard to the increased local traffic congestion and substantial increased pressure on all local facilities.

WNF has followed responses to the CEC Local Plan through the consultation process. We have been listening attentively to and working closely with local councillors and residents in Woodford and neighbouring parishes in Cheshire East, including Handforth. This has helped to inform this representation.

Explanation of Woodford context

Members of the Forum are concerned about the potential cumulative impact of three sites which between them could accommodate many thousands of houses in an area currently protected by national and Development Plan Green Belt policies. We have estimated that over 3000 new houses could be constructed within a 2 km radius of Woodford Village Church.

10. Signature



Evelyn Frearson
Honorary Secretary, Woodford Neighbourhood Forum

11. Date

24th April 2014

Representation Form Part B: Representation 3 and 4

Name and Organisation	Evelyn Frearson on behalf of Woodford Neighbourhood Forum (as Honorary Secretary)		

3. To which document does this representation relate?

Local Plan Strategy <input checked="" type="checkbox"/>	Habitats Regulations Assessment
Sustainability Appraisal	Policies Map

4. To which part of the document does this representation relate?

Policy: PG1	Site:	Strategic Location:	Paragraph:
Figure:	Table:	Vision Box:	Strategic priority:

5. Do you consider the Local Plan Strategy is:

Legally Compliant	Yes	No <input checked="" type="checkbox"/>
Sound	Yes	No <input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	Yes	No <input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan Strategy is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Strategy or its compliance with the duty to co-operate, please also use this box to set out your comments.

Representations 3 and 4

Policy PG 1 Overall Development Strategy

The Forum raises concerns about the provision of 500 dwellings to be accommodated for the benefit of High Peak Council. The whole of Woodford lies within the Green Belt as defined for Greater Manchester. The areas adjacent to Woodford within Cheshire East include Handforth, Poynton, Wilmslow and Adlington and their rural areas are also recognised as requiring the policy protection afforded by Green Belt designation. To encourage the needs to High Peak Borough when the northern rural areas of Cheshire East are all protected by Green Belt policy is clearly inconsistent with national Green Belt policy as set out in the National Planning Policy Framework.

The Forum considers this proposal lacking in justification and effectiveness, as it is proposing additional development in an area already recognised as one of constraint on new development. The restraint is retained in other parts of the Local Plan. It is unsound as being unjustified, ineffective and inconsistent with national policy for the Green Belt. The Forum considers the Local Plan Strategy to have failed the test of soundness as set out in paragraph 182 of the National Planning Policy Framework as shall be demonstrated in

respect of policies PG1, PG3 sections 5 to 8 inclusive, PG4 and policies CS30 and CS34.

Woodford lies within Stockport Borough and therefore within Greater Manchester. The Council's Core Strategy was adopted in 2011, over three years ago. The Forum is very concerned about Stockport's lack of progress on its Site Allocations Plan since that time. From our recent exchanges of correspondence with Council officers, there seems an inability to take the Site Allocations Plan forward at all. The effect of this delay means that Stockport Council at least cannot now show how it can meet its own identified needs up to 2030. Since Stockport Council cannot demonstrate their own supply of housing land coming forward, we fail to see what evidence base has led Cheshire East to conclude that the neighbouring authorities are not in a position to help meet Cheshire East's housing need (paragraph 12.5 of the Cheshire East report to the Strategic Planning Board meeting on 26 February 2014 refers).

The Forum notes from the experience of its own members that the south Manchester/north Cheshire housing market pays little or no regard to local authority boundaries. In making their housing decisions, families take a wide variety of personal circumstances and factors into account. We would suggest that such local boundaries are a very small factor in their decision making. Indeed, such boundaries are not fixed and Woodford was itself part of Cheshire until Stockport Metropolitan Council was established in 1974.

7. Please set out what modification(s) you consider necessary to make the Local Plan Strategy legally compliant or sound, having regard to the test you have determined at 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recommendation 3

The Forum requests that the reference to any requirement to meet any need from High Peak Borough should be deleted from the Plan.

Recommendation 4

The Forum further requests that some evidence be sought from the Greater Manchester Councils as to the extent of their housing need they would wish to see accommodated in North Cheshire and/or some evidence of how and why they cannot meet some of Cheshire East's housing requirement given the nature of the cross boundary housing market.

8. If your representation is seeking a modification do you consider it necessary to participate at the oral part of the examination

Yes ✓

No

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Woodford Neighbourhood Forum wishes to have a representative participate at the oral

part of the examination because of the following context:

Context

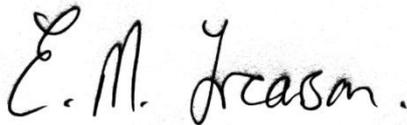
Woodford Neighbourhood Forum (WNF) was designated by Stockport Metropolitan Borough Council (SMBC) in September 2013. The historical parish boundary delineates the Neighbourhood Area (with the exclusion of land incorporated in development plans for the A6-Manchester link Road Scheme and the former Woodford Aerodrome Site). The whole of Woodford currently lies within the Greater Manchester Green Belt within Stockport Borough and this is contiguous with the adjoining areas on the Cheshire East side of the boundary subject to the North Cheshire Green Belt. The people and businesses of Woodford are in the middle area between a proposed housing redevelopment of up to 1000 houses on the Stockport side (the subject of a current planning application by a housing development company) and the proposed release of Green Belt land for major development on the Cheshire East side at Handforth and further areas of Wilmslow beyond. The cumulative impact of these proposed developments would completely change the character of this area. It would become wholly residential rather than its predominant characteristic at the moment which is its openness between the adjacent settlements. It therefore fulfils one of the essential purposes of national Green Belt policy which would be lost by the planned developments proceeding to construction. In addition, all local services and facilities would be impacted by the plan, particularly with regard to the increased local traffic congestion and substantial increased pressure on all local facilities.

WNF has followed responses to the CEC Local Plan through the consultation process. We have been listening attentively to and working closely with local councillors and residents in Woodford and neighbouring parishes in Cheshire East, including Handforth. This has helped to inform this representation.

Explanation of Woodford context

Members of the Forum are concerned about the potential cumulative impact of three sites which between them could accommodate many thousands of houses in an area currently protected by national and Development Plan Green Belt policies. We have estimated that over 3000 new houses could be constructed within a 2 km radius of Woodford Village Church.

10. Signature



Evelyn Frearson
Honorary Secretary, Woodford Neighbourhood Forum

11. Date

24th April 2014

Representation Form Part B: Representation 5

Name and Organisation	Evelyn Frearson on behalf of Woodford Neighbourhood Forum (as Honorary Secretary)		

3. To which document does this representation relate?

Local Plan Strategy <input checked="" type="checkbox"/>	Habitats Regulations Assessment
Sustainability Appraisal	Policies Map

4. To which part of the document does this representation relate?

Policy: PG3	Site:	Strategic Location:	Paragraph:
Figure:	Table:	Vision Box:	Strategic priority:

5. Do you consider the Local Plan Strategy is:

Legally Compliant	Yes	No <input checked="" type="checkbox"/>
Sound	Yes	No <input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	Yes	No <input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan Strategy is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Strategy or its compliance with the duty to co-operate, please also use this box to set out your comments.

Representation 5

Policy PG 3 Green Belt

The Forum supports the recognition of the continuing purpose of the Green Belt in North Cheshire. It strongly supports section 1 to 4 of policy PG 3.

The Forum strongly objects to the remaining points of this policy, in particular items listed in point 5 as follows:

viii Site CS 30 North Cheshire Growth Village, Handforth East

xii Site CS 34 (Safeguarded) North Cheshire Growth Village, Handforth East

In the Forum's view, this land has been identified for development erroneously and inappropriately and the majority of our submission sets out our reasons for this view. The policy fails the test of soundness as being unjustified, ineffective and inconsistent with national policy for the Green Belt.

7. Please set out what modification(s) you consider necessary to make the Local Plan Strategy legally compliant or sound, having regard to the test you have determined at 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recommendation 5

The Forum requests that items viii and xii of item 5 in policy PG 3 relating to Handforth should be deleted from the Plan as inconsistent with national Green Belt policy.

8. If your representation is seeking a modification do you consider it necessary to participate at the oral part of the examination

Yes ✓	No
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Woodford Neighbourhood Forum wishes to have a representative participate at the oral part of the examination because of the following context:

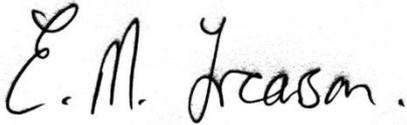
Context

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WNF has followed responses to the CEC Local Plan through the consultation process. We have been listening attentively to and working closely with local councillors and residents in Woodford and neighbouring parishes in Cheshire East, including Handforth. This has helped to inform this representation.

Explanation of Woodford context

Members of the Forum are concerned about the potential cumulative impact of three sites which between them could accommodate many thousands of houses in an area currently protected by national and Development Plan Green Belt policies. We have estimated that over 3000 new houses could be constructed within a 2 km radius of Woodford Village Church.

10. SignatureA handwritten signature in black ink that reads "E. M. Frearson." The signature is written in a cursive style with a period at the end.

Evelyn Frearson
Honorary Secretary, Woodford Neighbourhood Forum

11. Date

24th April 2014

Representation Form Part B: Representation 6

Name and Organisation	Evelyn Frearson on behalf of Woodford Neighbourhood Forum (as Honorary Secretary)		

3. To which document does this representation relate?

Local Plan Strategy <input checked="" type="checkbox"/>	Habitats Regulations Assessment
Sustainability Appraisal	Policies Map

4. To which part of the document does this representation relate?

Policy: Policy PG4	Site:	Strategic Location:	Paragraph:
Figure:	Table:	Vision Box:	Strategic priority:

5. Do you consider the Local Plan Strategy is:

Legally Compliant	Yes	No <input checked="" type="checkbox"/>
Sound	Yes	No <input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	Yes	No <input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan Strategy is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Strategy or its compliance with the duty to co-operate, please also use this box to set out your comments.

Representation 6

Policy PG 4 Safeguarded Land

This policy as currently prepared is unsound as we shall demonstrate. Paragraph 85 of the NPPF states that where necessary, local authorities identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period

The proposed policy is supported by sections 8.56 to 8.63 of the draft Local Plan, which state as follows:

8.56 Green Belt boundaries are intended to endure over the longer-term. Therefore, when reviewing Green Belt boundaries, it is important to draw the new boundaries having regard to potential development needs arising well beyond the Plan period.

8.57 Consequently, it is necessary to identify areas of 'Safeguarded Land' that are between the urban area and the new Green Belt boundary in order to meet these potential long-term development requirements and avoid the need for another review of the Green Belt at the

end of this Plan period.

Cheshire East Council have not provided any substantial evidence that the identification of safeguarded land in the Local Plan is necessary. This applies to all such areas in Cheshire East. Paragraph 83 of the NPPF indicates that Green Belt boundaries should only be altered in exceptional circumstances. No justification to justify such exceptional circumstances for the removal of and from Green Belt in the northern towns of Cheshire East has been made including Handforth and Poynton. The policy therefore lacks justification.

Furthermore, while all the other areas proposed to have new areas of safeguarded land are identified and were the subject of recent public consultation, Policy PG4 in the draft Local Plan states only at item 6:

“In addition to these areas of Safeguarded Land listed; it may also be necessary to identify additional non-strategic areas of land to be safeguarded in the Site Allocations and Development Policies Document, which will include around 5 to 10 hectares to serve the longer-term development needs in Poynton.”

Policy PG 4 treats the towns of Northern Cheshire, all of which are inset into the North Cheshire Green Belt, differently and no explanation is offered for this in the Plan. Safeguarded land is proposed in towns including Handforth, yet for Poynton point 6 of the policy states that land will be found at a later stage for Poynton's longer term needs. Firstly, there is no explanation or justification as to why Poynton has been treated differently from the other town within the North Cheshire Green Belt (and as shown in the earlier sections of policy PG 4) Secondly, there is no explanation as to how the figure of 5 to 10 hectares has been derived – this is referred to later. The elements of policy PG 4 are therefore lacking in justification, inconsistent with manner in which North Cheshire Green Belt towns have been considered and inconsistent with National Green Belt policy.

When seen against the proposed land release out of Green Belt to create the Handforth Growth Village, as a further option, we can see three different approaches to taking land out of the Green Belt at work. These are;

- The proposed policy PG 4 to create new safeguarded land in all North Cheshire town apart from Poynton
- A proposal to identify an amount of land to be removed later from the Green Belt in the Poynton area
- A proposed new Growth Village at Handforth

Principle of Green Belt release

Together these three types of proposals present a major concerted attack on the North Cheshire Green Belt. The Forum is opposed to the whole principle of Green Belt release for housing. Furthermore, by deploying different policy devices to achieve the release of land from the Green Belt, the Borough Council is clearly aiming to set one community against another as they seek to protect their Green Belt areas in the hope that this mixed policy strategy will find some weaknesses. As local residents, we are aware of other local landowners in North Cheshire who will now take this opportunity afforded by three ways of taking land from the Green Belt to put forward their sites as being more sustainable and better located than the Borough Council's own proposals, and policy preferences. We have no doubt that some alternative sites will come forward as their uses are often short term in character (such as grazing licences). We are concerned that once the possibility of Green Belt release is opened up to local landowners, then they will want their land considered for development also. This will literally be a once in a lifetime opportunity.

We then have a further concern which is as follows: the local community would have no opportunity to give their views on these new sites coming forward because they will not have been identified during the consultation process undertaken by the Borough Council. Indeed, since we understand that the Borough Council is itself the major landowner for much of the proposed release of land from Green Belt, other landowners may wish to have an independent view of their own land's prospects for release from Green Belt and for development in the longer term, even if not in the immediate plan period.

For all these reasons, we have concluded that, as such, section 6 of policy PG 4 is unsound.

7. Please set out what modification(s) you consider necessary to make the Local Plan Strategy legally compliant or sound, having regard to the test you have determined at 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recommendation 6

The Forum requests the deletion of policy PG 4 as unsound for the reason of its conflict with national policies for the Green Belt.

8. If your representation is seeking a modification do you consider it necessary to participate at the oral part of the examination

Yes ✓	No
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Woodford Neighbourhood Forum wishes to have a representative participate at the oral part of the examination because of the following context:

Context

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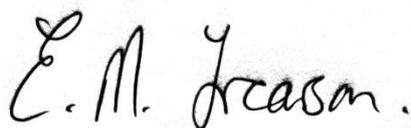
which is its openness between the adjacent settlements. It therefore fulfils one of the essential purposes of national Green Belt policy which would be lost by the planned developments proceeding to construction. In addition, all local services and facilities would be impacted by the plan, particularly with regard to the increased local traffic congestion and substantial increased pressure on all local facilities.

WNF has followed responses to the CEC Local Plan through the consultation process. We have been listening attentively to and working closely with local councillors and residents in Woodford and neighbouring parishes in Cheshire East, including Handforth. This has helped to inform this representation.

Explanation of Woodford context

Members of the Forum are concerned about the potential cumulative impact of three sites which between them could accommodate many thousands of houses in an area currently protected by national and Development Plan Green Belt policies. We have estimated that over 3000 new houses could be constructed within a 2 km radius of Woodford Village Church.

10. Signature



Evelyn Frearson
Honorary Secretary, Woodford Neighbourhood Forum

11. Date

24th April 2014

Representation Form Part B: Representation 7

Name and Organisation	Evelyn Frearson on behalf of Woodford Neighbourhood Forum (as Honorary Secretary)		

3. To which document does this representation relate?

Local Plan Strategy <input checked="" type="checkbox"/>	Habitats Regulations Assessment
Sustainability Appraisal	Policies Map

4. To which part of the document does this representation relate?

Policy: Policy PG6	Site:	Strategic Location:	Paragraph:
Figure:	Table:	Vision Box:	Strategic priority:

5. Do you consider the Local Plan Strategy is:

Legally Compliant	Yes	No <input checked="" type="checkbox"/>
Sound	Yes	No <input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	Yes	No <input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan Strategy is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Strategy or its compliance with the duty to co-operate, please also use this box to set out your comments.

Representation 7

Policy PG 6 Spatial Distribution of Development

This policy proposes development for the Key Service Centres for both employment and housing. No explanation is provided as to how the spatial distribution of these uses has been determined.

We have undertaken a simple exercise looking at the potential needs of the Key Service Centres in Cheshire East. We have considered the proposed amount of new housing in relation to the existing size of populations of the town listed in policy PG 6. We have used the latest population estimates and applied the current average household size to achieve an estimate of the total number of houses within each settlement. We have then compared the approximate number of existing houses with the policy figures given in policy PG 6.

The conclusions from our work are as follows:

Group 1 towns lying inset into the North Cheshire Green Belt - Knutsford, Wilmslow, Poynton. The percentage increase in new housing shown in the Local Plan is between 3 and 12% of existing stock. This reflects their Green Belt location, yet allows for some needs to be accommodated.

Group 2 towns lying either beyond the Green Belt or having only part Green Belt status – Alsager, Congleton, Middlewich, Nantwich, Sandbach. The percentage increase in new housing shown in the Local Plan is between 29 and 32% and shows a very consistent approach to future planning.

Group 3 town – Handforth, including the housing proposed within the town and the Handforth East growth village. The percentage increase in new housing is around 52% of existing stock. Without the growth village, the amount would be around 4%, and therefore compatible with the group 1 towns.

We would comment as follows on our exercise. The other Key Service Towns have been treated reasonably consistently with a lower range of growth for towns inset into the Green Belt to reflect that status. A higher proportionate amount of development is proposed in the non-Green Belt towns to the south of the Borough and therefore beyond the limits of Green Belt control to limit the outward spread of the Greater Manchester conurbation and its constituent towns. Both these findings are compliant with national policies for the Green Belt.

The findings for Handforth are however completely at odds with such a consistent and planned approach. The Forum can only conclude that in the absence of other factors justifying the spatial distribution, the Council's land ownership of the Handforth sites is the only explanation for the major anomaly in planning. It is evident that the amount of development proposed at Handforth is far in excess of its own needs even allowing for the needs of High Peak Council. The Council's Local Plan fails the test of soundness in all respects insofar as the Handforth proposals are concerned. The Plan has taken undue regard of land ownership factors at the expense of other relevant considerations, such as national Green Belt policy and infrastructure requirements.

We have previously commented on the cumulative impact of land being taken out of the Green Belt on sites immediately adjacent to Woodford. We also note with concern the amount of development proposed and proposed safeguarded land in the Wilmslow area which will add further to the impact on local services, on local infrastructure and the change in the character of the whole North Cheshire area envisaged in this Plan.

7. Please set out what modification(s) you consider necessary to make the Local Plan Strategy legally compliant or sound, having regard to the test you have determined at 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recommendation 7

The Forum request the deletion of item 3 of policy PG 6 as it fails the test of soundness. It also suggests that 150 new houses in Handforth in item 2 of policy PG be retained as this figure is consistent with internal growth rates for towns inset into the Green Belt.

8. If your representation is seeking a modification do you consider it necessary to participate at the oral part of the examination

Yes ✓	No
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9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Woodford Neighbourhood Forum wishes to have a representative participate at the oral part of the examination because of the following context:

Context

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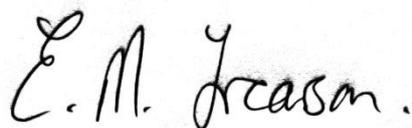
WNF has followed responses to the CEC Local Plan through the consultation process. We have been listening attentively to and working closely with local councillors and residents in Woodford and neighbouring parishes in Cheshire East, including Handforth. This has helped to inform this representation.

Explanation of Woodford context

Members of the Forum are concerned about the potential cumulative impact of three sites which between them could accommodate many thousands of houses in an area currently protected by national and Development Plan Green Belt policies. We have estimated that over 3000 new houses could be constructed within a 2 km radius of Woodford Village

Church.

10. Signature

A handwritten signature in black ink that reads "E. M. Frearson." The signature is written in a cursive style with a large initial 'E' and 'M'.

Evelyn Frearson
Honorary Secretary, Woodford Neighbourhood Forum

11. Date

24th April 2014

Representation Form Part B: Representation 8

Name and Organisation	Evelyn Frearson on behalf of Woodford Neighbourhood Forum (as Honorary Secretary)		

3. To which document does this representation relate?

Local Plan Strategy <input checked="" type="checkbox"/>	Habitats Regulations Assessment
Sustainability Appraisal	Policies Map

4. To which part of the document does this representation relate?

Policy: Policy SD1 and SD2	Site:	Strategic Location:	Paragraph:
Figure:	Table:	Vision Box:	Strategic priority:

5. Do you consider the Local Plan Strategy is:

Legally Compliant	Yes	No <input checked="" type="checkbox"/>
Sound	Yes	No <input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	Yes	No <input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan Strategy is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Strategy or its compliance with the duty to co-operate, please also use this box to set out your comments.

Representation 8

Policies SD1 and SD 2 Planning for Sustainable Development

Policies SD and SD 2 set out how Cheshire East Council proposes to comply with the principles of sustainable development. 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 Forum considers that many proposals and policies of the Local Plan fail to comply with these SD policies, in the same Plan, in particular the cumulative impact of Green Belt release across the northern part of the Borough. These fail to comply with the principles of sustainable development, being by definition land in a rural area surrounding towns and villages.

We are aware that other communities in North Cheshire will be objecting to the release of land from the Green Belt for housing and employment development. Our particular concern is in respect of policies C30 and C34 for Handforth which we have examined in terms of their compliance with policies SD 1 and SD2.

The site described in Policies CS30 and CS34 is currently mainly open 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 has been left to natural regeneration (the remaining 30%). It includes many ponds, mature trees, public footpaths and other features of a rural landscape. The majority of the site is in active and positive use as farmland as befits a site lying within the Green Belt. It also fulfils other purposes of the Green Belt in providing access to the countryside for local residents and visitors, being well used by the public for walking, angling and the flying of model aircraft. It has an abundance of local wildlife which itself attracts people interested in local flora and fauna. Many species of birds, mammals, insects and invertebrates are present and a large number of different plant species have been identified by our members, some of whom are making their personal representations on such matters. Some species are protected and we are aware that there were great crested newts present in the area when the A555 was constructed which needed to be translocated. These combine to create very special and unusual habitats lying in close proximity to residents in the adjacent towns and villages able to enjoy its many assets.

7. Please set out what modification(s) you consider necessary to make the Local Plan Strategy legally compliant or sound, having regard to the test you have determined at 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan Strategy legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recommendation 8

The Forum supports the policies for sustainable development as set out in SD 1 and SD 2. It concludes that the cumulative effect of the proposals for the release of Green Belt land in North Cheshire is contrary to these policies of the Plan.

8. If your representation is seeking a modification do you consider it necessary to participate at the oral part of the examination

Yes ✓

No

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Woodford Neighbourhood Forum wishes to have a representative participate at the oral part of the examination because of the following context:

Context

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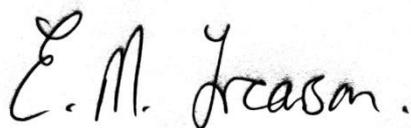
boundary subject to the North Cheshire Green Belt. The people and businesses of Woodford are in the middle area between a proposed housing redevelopment of up to 1000 houses on the Stockport side (the subject of a current planning application by a housing development company) and the proposed release of Green Belt land for major development on the Cheshire East side at Handforth and further areas of Wilmslow beyond. The cumulative impact of these proposed developments would completely change the character of this area. It would become wholly residential rather than its predominant characteristic at the moment which is its openness between the adjacent settlements. It therefore fulfils one of the essential purposes of national Green Belt policy which would be lost by the planned developments proceeding to construction. In addition, all local services and facilities would be impacted by the plan, particularly with regard to the increased local traffic congestion and substantial increased pressure on all local facilities.

WNF has followed responses to the CEC Local Plan through the consultation process. We have been listening attentively to and working closely with local councillors and residents in Woodford and neighbouring parishes in Cheshire East, including Handforth. This has helped to inform this representation.

Explanation of Woodford context

Members of the Forum are concerned about the potential cumulative impact of three sites which between them could accommodate many thousands of houses in an area currently protected by national and Development Plan Green Belt policies. We have estimated that over 3000 new houses could be constructed within a 2 km radius of Woodford Village Church.

10. Signature



Evelyn Frearson
Honorary Secretary, Woodford Neighbourhood Forum

11. Date

24th April 2014

Representation Form Part B: Representation 9

Name and Organisation	Evelyn Frearson on behalf of Woodford Neighbourhood Forum (as Honorary Secretary)		

3. To which document does this representation relate?

Local Plan Strategy <input checked="" type="checkbox"/>	Habitats Regulations Assessment
Sustainability Appraisal	Policies Map

4. To which part of the document does this representation relate?

Policy: Policy CS30 and CS34	Site:	Strategic Location:	Paragraph:
Figure:	Table:	Vision Box:	Strategic priority:

5. Do you consider the Local Plan Strategy is:

Legally Compliant	Yes	No <input checked="" type="checkbox"/>
Sound	Yes	No <input checked="" type="checkbox"/>
Compliant with the Duty to Co-operate	Yes	No <input checked="" type="checkbox"/>

6. Please give details of why you consider the Local Plan Strategy is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Strategy or its compliance with the duty to co-operate, please also use this box to set out your comments.

Representation 9

Local Plan Strategy Sites Sites in Handforth Policies CS 30 and CS34

We set out our case in respect of the site specific proposals below. The Forum is aware of the proposed principles for development of site CS 30 for the proposed North Cheshire Growth Village. We are aware of the strong objections from the Handforth Parish Council to these proposals and we particularly would like to endorse the following aspects of their objections.

Traffic impact and access

Policy CS 30 shows the only road access from the proposed Growth Village leading directly onto the A34, a road already severely congested in the peak travel times. Northbound traffic aiming for the M60 Manchester Orbital motorway is particularly slow in movement. There was an opportunity to re-design the highway network recently when the proposals for the completion of the route from the A6 to Manchester Airport were the subject of public consultation and subsequently planning applications to the three local authorities, Manchester, Stockport and Cheshire East. However, the design of the nearest relevant junction to the Growth village at A34/A555 makes no provision for the proposals

now set out by Cheshire East in policy CS 30. It is therefore not surprising that Stockport Council has expressed major concerns over this traffic issue and has agreed to carry out a joint transport study with Cheshire East Council. In the Forum's opinion, this is yet another example of a failure of the Duty to Cooperate. We would conclude from this series of events that this location for the development set out in Policy CS 30 is unsustainable, fails the test of being positively prepared and, in not setting out adequate infrastructure requirements, fails the Duty to Co-operate.

Means of access to the Growth Village

Neither are there in our view alternative means of transport proposed by which future residents of the Growth Village would be able to access employment and other vital services and facilities. For example, the two sites shown in Policies CS 30 and CS 34 do not lie within safe walking or cycling distance of any major existing significant employment locations or proposals in the Plan for significant employment allocations. Travel to work to the large employment and service locations such as Manchester International Airport, Manchester city centre, other city and district centres or any of the major employment areas located along the M60 motorway would have to be by private car. This would further exacerbate the traffic issues discussed in the previous section.

Furthermore, the proposed Growth Village is not currently served by public transport. There are no bus services passing the site at present. There is a railway station in the centre of Handforth, but unless the current configuration of the A34 and its access roads is changed substantially, it would present a major physical and logistical barrier to anyone wishing to walk the station. The western part of the CS 30 site would be nearer to the railway station. Walking times and cycling times would increase as development progressed in an easterly direction away from Handforth. Furthermore, there is currently no off-street car parking provision at Handforth Station, nor any opportunities to create any as the station is currently surrounded by built development as it lies at the heart of the Handforth community. We cannot see where any proposals have been made in the Plan for new public transport links. It is our view that the majority of the trips to and from the Growth Village for all purposes would have to be made by car. This in itself is unsustainable, made worse by the additional traffic created onto existing congested roads in the local area leading towards and from the M60 motorway.

Local services

The Growth Village proposes a development of around 1850 new homes and 12 hectares of employment land (policy PG 6). In size, this would create the largest settlement in North Cheshire apart from Macclesfield town. Yet the location proposed for the Growth Village in policies CS 30 and CS 34 is some distance from other facilities. Policy SD 2 of the Local Plan sets out distances to services and amenities likely to be acceptable for walking, cycle or other transport routes. We note that Cheshire East Council has not provided any assessment of the distance from the Growth Village to local services. We can advise from our local use and knowledge as residents of the immediately adjoining area that there is already a deficit in many local services arising from the areas semi-rural location and also from its position at the extremity of service provision being operated from the nearest large towns such as Stockport and Macclesfield. We are aware that small scale local shops and a primary school are proposed for the site, but there is no assessment of the costs being provided. We can confirm that there are no significant medical facilities, senior age schools, local authority offices, libraries or dentists near the site or within convenient travelling time/distance of the site, apart from by private car. Neither does the Local Plan itself propose any additional facilities to serve such needs. No assessment appears to have been done about the real infrastructure requirements for a new settlement of around 4500 people. Based on the current information in the Local Plan, all trips to these services in adjoining towns would need to be made by car. A development of this site on the scale

proposed is clearly in our view unsustainable and does not comply with the Plans' own criteria for sustainable development.

Feasibility of development

The Forum is aware through our members of many potential further potential constraints to development of the Growth Village in the scale proposed in this Local Plan. These include destruction of existing habitats, including those of protected species, and the physical characteristics of the site proposed in CS 30. We can confirm that there is a very high water table as can be evidenced by the many ponds spread across the site. Furthermore, we are aware that natural drainage was changed by the construction of the A555. Landfill sites are also present in the area, some of which may contain asbestos and other industrial remains. Part of the site was the 61 M.U. (Munitions Unit), one of several in south Manchester created for wartime purposes. Beneath the surface of those parts of the site which were formerly the military maintenance depot area will be the remains of structures and roadways. A partial reclamation scheme took place over 30 years ago using Central Government funding but this was later abandoned. There will be substantial costs in mitigating and ameliorating the impact of these site constraints. However, no such costs associated with dealing with these issues are presented in the public documents available. It is therefore in our view not possible for the Council to know with any degree of clarity or certainly at this stage if the use of this land for built development is either feasible or deliverable. We would have expected to see an outline economic and site constraints assessment of the proposals in order that all parties can reach a view through the Local Plan process as to whether the deliverability of this site complies with the sustainability policies set out in the Plan. In our view, without some estimates of costs the site is unsustainable.⁴³ The Forum concludes that policies CS 30 and CS 34 do not satisfy the test of soundness as we have shown above.

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Recommendation 9

The Forum requests the deletion of policies CS 30 and CS 34 concerning the Handforth Growth Village.

8. If your representation is seeking a modification do you consider it necessary to participate at the oral part of the examination

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Woodford Neighbourhood Forum wishes to have a representative participate at the oral part of the examination because of the following context:

Context

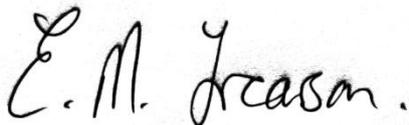
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