

# HASSALL ROAD, ALSAGER Ref: 12/1670C

Appeal - 3<sup>rd</sup>/5<sup>th</sup> September 2013

## Statement on behalf of Alsager Residents Action Group

Good Morning Sir,

My name is Derek Bould and I am an Honorary Alderman of Cheshire, having spent sixteen years as a Cheshire County Councillor representing Alsager, Church Lawton, Hassall and Betchton; in addition to twenty years as an Alsager Town Councillor.

Alsager Residents Action Group (ARAG) is a non-political campaigning organisation that has been in existence for more than 25 years and represents the whole of our Town, rather than specific individual site applications, although we support all groups and communities in challenging inappropriate and speculative development proposals on Greenfield sites.

We are in the process of carrying out a campaign to identify the level of support, amongst our community, for ARAG's proposals. We have already received in excess of 3,000 positive 'named' responses and this clearly demonstrates that ARAG very effectively represents the views of a substantial proportion of the Alsager community.

Members of ARAG have attended, and given evidence, at recent appeals which included a site in Alsager. During this time we have learned a substantial amount about the appeal process and details of the evidential basis for Cheshire East's Emerging Local Plan.

**Because we now have information which we were not party to when this appeal commenced, and was adjourned, we wish to raise a number of very important issues that we were not equipped to raise previously:**

- **Availability of Affordable Homes in Alsager.**
- **Sustainability of Alsager, with regard to Employment and Infrastructure.**
- **Developer delivery of Affordable Homes**
- **The position of Alsager as an Area of Restraint.**
- **Emerging Local Plan Prematurity problems - created by the cumulative effect of the existing Greenfield Site applications and appeals.**
- **The relevance of Settlement Zone Lines (SZL).**

On to the subject of Housing Demand, which centres heavily on the need for Affordable Housing, we are of the view that while this shortfall is clearly apparent in the South East it is not at all clear that a significant shortfall exists in the West of Cheshire East where

Developers are clamouring to develop Greenfield sites.

Indeed in Alsager, and similarly Sandbach, Middlewich and Crewe, there were a large number of Council Houses which were bought under 'The Right to Buy' scheme.

Significant numbers of these properties are now available for purchase and by their very nature fall into the category of 'Affordable Houses'.

This situation should be a factor when considering the developers argument, that they are simply attempting to satisfy the demand for Affordable Housing.

May I be allowed to comment on the requirement for 36 Affordable Houses per year identified in the Strategic Housing Market Assessment (SHMA), and the Adopted Alsager Town Strategy, referred to in cross examination by Ms Ellis; representing the Appellants. No reference to this requirement appeared in the Draft Alsager Town Strategy and was therefore not subject to consultation with the Alsager community. Copies of the Adopted Alsager Town Strategy were not available to the public until stapled documents were circulated at the Full Town Council Meeting, on the 31<sup>st</sup> July 2012, when the document was adopted.

Our community's main concern was to ensure that the policy of Brownfield before Greenfield had been included and that the plethora of Greenfield sites had been removed. It is entirely understandable that the incompatibility of a Housing Target of 1000 dwellings, over the Plan period, with a perceived need for 36 Affordable houses/year; was not realised on the night.

However, this issue was raised with the Town Council at the first opportunity and I believe it was accepted that this problem would need to be addressed. If 36 affordable houses were to be built, as 30% of each housing development, it would require 120 dwellings/year to be built and a total of 2400 during the Plan period.

In practice, our communities find that they cannot rely on developers to deliver on their promises to providing these Affordable homes.

One developer was given an outline approval for a large site of about 400 dwellings, adjacent to the 'Cross Keys' on Remer Street in Crewe, which included 35% Affordable Housing. Once this had been achieved they returned to Cheshire East Planners and re-negotiated this proportion down to 10% on the basis of economic viability.

It seems incomprehensible that a 'nationally recognised' Housing Developer would not be aware that they were agreeing to something which was not financially viable, until after the Outline Approval had been given.

The fact remains that the payment made to Cheshire East, as part of this deal, is an irrelevance but the 25% reduction (in the proportion of Affordable Houses) in the final approval means that 100 less Affordable Homes will be built in Crewe.

**How can our communities possibly give any credence to the NPPF and other planning guidance when this is the final outcome?**

**They see this as clearly putting speculative corporate profit before people.**

The one important issue that has received little comment during this Appeal Process is the question of employment growth – providing jobs for those families who will occupy the 27,000 houses identified in the Cheshire East Draft Development Strategy, let alone the thousands of additional homes that will be built if these appeals for speculative development sites are approved.

**Cheshire East Officers have categorised Alsager as a Key Service Centre and have already accepted (at the Sandbach Road North Appeal) that the town is not sustainable, as far as employment is concerned, with a deficit of at least 300 jobs.**

Alsager has lost jobs at BAe Systems at Radway, the Manchester Metropolitan University (MMU) and Twyfords in recent times and nearby large numbers of jobs were lost at ICL and GEC.

**Common sense and our residents tell us that jobs attract families who then need homes; it seems utterly ludicrous (to them) to suggest that building thousands of homes first, attracts jobs.**

In addition, looking at the issue of the requirement to provide a 5 year supply of available housing land; much of this has already been achieved in our Towns with the planned and speculative Greenfield developments which already have Outline Permissions.

Here in Alsager, one planned brownfield site and one speculative Greenfield site have received Outline Approvals totalling 400 dwellings out of the Alsager Adopted Town Strategy allocation of 1000 over the Plan period - which in our case equates to a 7 year supply of available housing land.

The problem facing our community in Alsager is that we have Appeals in Progress which account for another 435 houses on Greenfield sites, Refused Applications which have not yet been Appealed, New Applications and Pre-application consultations for a further 1500 of which 300 (on the MMU Brownfield site) are in the Adopted Town Strategy.

**The staggering possibility is that Alsager could be faced with 2,700 extra dwelling approvals in the first few years of the Plan period and this figure excludes the proposed New Village of more than 2,700 houses at Barthomley which is right on our doorstep.**

**In total, more or less doubling the effective size of our Town.**

**The character of our local community would be changed for ever – and certainly not in the manner that we would want – and the prolonged disruption created by building this number of dwellings, over a short five year period, would be catastrophic.**

**There could not be a stronger case for you to protect our communities from this onslaught of speculative development.**

This incredible growth in housing, if these appeals are upheld, will almost certainly cause crippling failures of our town's already inadequate infrastructure, **which has already been recognised by Cheshire East Officers as not being sustainable.**

The increase in traffic volumes together with unsatisfied demands on our schools, medical services, town centre parking, sewerage and other statutory undertaker services will make life extremely difficult for our existing and new communities.

It is even possible that our District Hospital, at Leighton, will be unable to accommodate the vast growth in demand for its services.

Additionally, this stampede of speculative development is entirely contrary to **Alsager's position as an 'Area of Restraint' because of its proximity to the North Staffordshire Conurbation of Stoke on Trent and Newcastle under Lyme with their Regeneration requirements.** The Area of Restraint policy has applied to Alsager in successive Congleton Borough Local Plans over many decades. It is a readily recognised policy which covers the whole of the area within the town boundary and has never identified individual site locations.

However, White Moss is outside the Alsager town boundary and is a possible development of between 800 and 1000 dwellings. It is therefore appropriate that Stoke on Trent and Newcastle' should have recently commented on this site as part of the normal consultation process.

It is perhaps important that ARAG should state its position on the proposed White Moss development; which although not technically a brownfield site has been described by Cheshire East's Planning Officers as "disturbed land".

We are very strongly of the view that, because of its position immediately adjacent to the Alsager town boundary and because Alsager has been categorised as a "key service centre", any housing development on this site should count toward Alsager's quota identified in the Adopted Town Strategy. Indeed, this approach has already been accepted for Church Lawton in the Cheshire East Proof of Evidence (Page 71).

This would lead directly to overprovision of the housing target for the town and would meet the housing development needs of our town up to, and beyond, the year 2040.

If approval were to be given, for the development of this site, it would be essential that phasing of delivery was scheduled over a significant period of the Plan period.

May I now comment briefly on the subject of 'perceived' poor construction delivery on sites with outline approvals?

At a Public Inquiry into the Manchester Metropolitan University (MMU) site, which took place ten years ago, although an outline approval was being sought, the MMU management were apparently nowhere near identifying a developer or a date for vacating the site. Indeed, vacating the site has only been achieved within the last few months. Our understanding is that if construction does not commence on a site, within 3 years of

an outline approval, the permission lapses. So in the case of the MMU site, where it has only recently been vacated by students, the site has not had an approval for many years and therefore delivery could not possibly be expected.

The use of this (and similar examples) as a criticism of Cheshire East's delivery performance, would be totally unwarranted because it is site owners/developers who determine when to start building, and they naturally respond to what the market dictates. It would be utterly ridiculous to hold Local Authorities responsible for the Speculative Developer's practice of LAND BANKING while they wait for an upturn in the housing market.

While on the subject of the MMU site I would wish to comment on the Draft Alsager Town Strategy Area 'J', immediately adjacent to the MMU site, and referred to in cross examination by Ms Ellis.

Area 'J' was only ever referred to, and consulted upon, as a single site and never as a group of separate sites.

**Our community considered it as a single site and rejected it as a single site.**

Regarding Area 'J' being identified as a 'Preferred Option'; it should be noted that although this site was reported upon on page 10 of the Draft Alsager Town Strategy, there was a further reference to Area 'J' but associated with the MMU site report at the top of page 13 and I quote:

"There is potential to incorporate Area J into any development for this area to provide a comprehensive scheme for development. This area would be expected to provide for further sports related development, **cemetery provision to meet the needs of the town** and additional homes".

Alsager's only burial ground, at Christ Church, is full to capacity and there is concern regarding burials having to be arranged in Crewe or Stoke on Trent.

It is not unreasonable to assume that it was this opportunity, to provide much needed cemetery provision, which led to Area 'J's identification as a Preferred Option.

**The Appeal Site is not identified for development in the Adopted Alsager Town Strategy or the Cheshire East Draft Development Strategy and, because of the cumulative effect of current Greenfield Applications and Appeals, would be premature to the Emerging Cheshire East Local Plan.**

**Cheshire East Officers have already confirmed (in the recent Sandbach Road North Appeal), that Alsager is not Sustainable in relation to Infrastructure and Employment and in addition the site is sufficiently remote from the town centre to render it unsustainable.**

**This appeal site is outside the Alsager Settlement Zone Line, is a Greenfield site, and in open countryside. A fundamental aim of such Greenfield sites is to prevent**

**urban sprawl by keeping land permanently open. Their essential characteristics are openness and permanence and as such Greenfield sites safeguard the countryside and assist in preventing joined up settlements.**

Finally, we could not help but be aware of the attention that is often drawn to the subject of various Appeal Determinations.

This causes us concern that, on the one hand, we are constantly told that each Planning Application/Appeal must be considered on its individual merits; on the other hand, we are told that determinations relating to other sites must influence the decision for this appeal. If this is the case, and we bow to expert opinion; surely if extending the Settlement Zone Line of Alsager is allowed in this instance it will effectively become a precedent for any future Applications/Appeals of this nature.

This represents a very significant step and introduces subsequent risk to the defined boundaries of our communities.

No such general extension of Settlement Zone Lines was indicated in the Adopted Town Strategy and clearly not wanted by our community.

**To summarise the main points of my statement:**

- **We expect government, and therefore the Planning Inspectorate, to implement stated policies on Community Involvement and Localism.**
- **We also ask you to consider our comments on the Affordable Housing Stock which is already available within our Towns and the failure of many developers to deliver the 30% target.**
- **Further, we ask you to take into consideration the need to achieve a balance between house building and job creation.**
- **We ask you to consider the risk to our settlements of establishing, what appears to be a form of precedent, for allowing the extension of Settlement Zone Lines without the clear knowledge and support of the local community.**
- **Additionally, we ask you to consider very carefully the on-going effect that**

**your strategic decision, on the 5 year supply of Available House Building Land, will have on Alsager in particular and Cheshire East as a whole, on the future character of our local communities.**

- **Finally: we ask you to be aware that if the information which has surfaced since Town Strategy consultation and more recently during local appeals, had been available to our local community much earlier, we believe the Adopted Town Strategy would have been very different. Emerging proposals for very large housing developments on our doorstep, at Barthomley and White Moss, together with the very disturbing revelation that Alsager is not sustainable as a Key Service Centre could have significantly altered the outcome of the consultation exercise. The fundamental basis, of Brownfield before Greenfield, would not change but detailed phasing requirements for brownfield site development could have been identified in order to prevent over provision during the early years of the Plan. It seems absolutely clear that any speculative development of our Greenfield sites would severely exacerbate overprovision and be premature to the Emerging Local Plan.**