

## **Appeal: Hassall Road**

### **Good Morning and thank you for the opportunity to contribute to this Inquiry.**

My name is Derek Longhurst and I am a resident of Alsager. I have no direct interest, however, to declare in relation to the Appeal site.

My professional background was in Higher Education for forty years. My last full-time employment was as Chief Executive of a national organisation that worked in partnership with major national and international employers to establish high quality degree programmes designed to meet the needs of employees in the 21<sup>st</sup> century.

At a regional level I was a senior academic at Staffordshire University since 1989 at Professorial level and in 2011 I was awarded an Emeritus Professorship by the University. I am, therefore, also very familiar with the issues surrounding regeneration in the Potteries and the area of restraint debates between the neighbouring authorities.

I have referred to this experience in order to emphasise a major theme of this presentation. The NPPF clearly acknowledges that economic growth is not just a matter of house-building but that it encompasses employment development, innovation and entrepreneurial strategies. It will be clear, then, why I have had from the outset a preoccupation with Alsager's development in terms of education, training and employment. In practical terms, this has led me to work with the Alsager Residents Action Group to develop a more creative approach to the potential mixed use of the former MMU site that will address these long-term issues for the community as a whole.

A second area of concern for me is in the provision and quality of regional healthcare. I am a member of a Patients Representative Group attached to one of the major practices in the town and I represent this group, with other colleagues, at the Regional Federation that advises the SCCCG (South Cheshire Clinical Commissioning Group). One of the projects on which I am currently working is the provision of community support for people with COPD (Chronic Obstructive Pulmonary Disorder) and it should be self-evident that (a) the Town's infrastructure in healthcare and education needs to be adequate to meet the needs of any additional residential building and (b) that Planning policy needs to take serious account of environmental issues as required by the NPPF (Para.7) in developing a low carbon economy, bearing in mind the proximity of the M6 to our community.

Finally, since April 2013 I am an elected Independent member of the Alsager Town Council. The process that led me to stand for election to the Town Council is very relevant to certain discussions that have already taken place in this Inquiry.

While it may be true that there may have been some discussion of the Town Strategy in the earlier sessions of this Appeal, the exchanges in the

session on Tuesday 3 September have raised serious issues that require clarification in relation to the status and process of developing the Alsager Town Strategy. These are issues that were not discussed in the earlier session in May nor were they clearly defined in the cross-examination of Mr Fisher by the Appellant's QC on Tuesday 3 September. As I was directly and personally involved in the processes and debates around the draft and adopted Town Strategies, I will endeavour to be very honest and accurate in my account of my experience of this process. It seems to me to be important to register these views in the light of the nature of the cross-examination that took place in this session. To do otherwise would not be even-handed in terms of evidential analysis.

In preparation for this session I reviewed the Questionnaire Survey that was issued regarding the Draft Town Plan. In Social Scientific analyses it is well-known that it is possible to shape questionnaires in particular ways that will privilege certain responses. It is my judgement that the Draft Town Strategy Survey was fairly worthless as an exercise, asking respondents, for instance, whether they agreed with the objective of developing a balanced economy... it would be a strange respondent who would say 'No' to such a general question. In no way does the structure of the questionnaire allow respondents to register their views about Area J in whole or in its parts. The results of the questionnaire can in no way, therefore, be indicative of grassroots support amongst Alsager respondents for house-building on Area J in any way whatsoever as was suggested by Ms Ellis. The results of this Survey, therefore, are not significant in determining 'the views of the local community' – which is declared as the purpose of the Town Strategy (1.15). In addition, it appeared that many residents were entirely unaware of this consultation taking place at all.

There were a number of issues in the Draft Plan that concerned me and so I started to attend Town Council meetings and take part in the public participation sessions. It gradually became clear that other residents were in a similar position and for certain of its Meetings the Town Council and its Planning Committee had to change from its normal venue to a Hall approximately the same size as this one in order to provide sufficient seating for the public. The Alsager Residents Action Group also held a public meeting that was attended by over 400 residents with standing room only.

My point is that this **was** an open and democratic process of public participation that led to the transition from a Draft Strategy that did not command a consensus of support to **an Adopted Town Plan that did achieve a considerable level of consensus.**

It seems to me to be problematic, therefore, when Ms Ellis is dismissive towards the Adopted Town Strategy as democratically informed.. **It seems to suggest that the real people living in a real community have no voice when it comes to the legal discourses of Planning, despite the Localism Act.** The implication of Ms Ellis's position is that all those people who participated in the process of contributing to the Town

Plan should have stayed at home and left any decision-making to, presumably, her Appellants?

In this context it is interesting to note that the NPPF conducts a strong argument that previous planning processes excluded people and communities; it would seem to be contrary, then, to the principles of the NPPF if it were to be argued that the real people living in the real community of Alsager should be discounted and excluded through disparagement of the Town Strategy approved by the community's elected representatives and informed by strong representations through residents participating in the process and expressing their views additionally through Residents Action Groups.

**The core principle of the Town Strategy that commands support from everyone is the principle of developing Brownfield sites before Greenfield ones.** Indeed, I would argue that the Town Strategy attempts to meet the Core Principles outlined in Paragraph 17 of the NPPF, one of which specifically indicates the need to

- Encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided that it is not of high environmental value

It is clear to everyone that this principle is appropriate to Alsager as a community and that it has **available and appropriate sustainable Brownfield sites to deliver an appropriate level of residential homes**. No amount of selective cherry-picking arguments by lawyers should be allowed to blur this principle and the realities that inform it within the community.

It seems very strange to this community when legal arguments regarding a specific Appeal site are woven around selective readings of various documents, precedents and other appeal sites while it is a requirement that a judgement is reached only on the merits or otherwise of a particular site without reference to the cumulative impact on a community of ad hoc un-joined up development driven only by the commercial interests of the landowner and the Appellants.

### **Sustainable Development: The Golden Thread of the NPPF**

There has been much debate surrounding the interpretation of the NPPF's '**presumption in favour of sustainable development**' said to be the '**golden thread running through both plan-making and decision-making**' (paragraph 14).

The phrase sustainable development is open to a wide range of interpretations and meanings often determined by specific 'interests'. For example, sustainable development may mean something quite different to a member of Greenpeace than it does when used by, say, a company engaged in the extraction of fossil fuels. In the present context of this Inquiry, it seems most appropriate to look for guidance to the NPPF. What the NPPF does not say is that there should be a presumption in favour of

any old speculative development that makes a dubious claim to being sustainable or accessible. The tests that must be addressed are not about short-term economic gain but about building a 'strong, responsive and competitive economy' with the identification of sites 'to support growth and innovation' and crucially in the context of Alsager

***By identifying and coordinating development requirements, including the provision of infrastructure.***

This Inquiry has already heard extensively about the infrastructural challenges in terms of employment and internal road infrastructure that are faced by Alsager as a community. It is important that these issues are addressed in both the short and long terms and, I stress, in a coordinated and strategic way, as commended in the NPPF, in place of *ad hoc* speculative development that is in danger of bringing no benefits to the community and in all likelihood will exacerbate existing problems. We surely should not be taking decisions that further magnify the current level of divergence as well as significantly increasing the level of out-commuting that is growing in Alsager.

The NPPF's interrogation of sustainable development does not stop, of course, with the economic dimension. It also requires that two additional dimensions exist within sustainable development and must be seen as ***integral*** to it. These are the social and environmental dimensions that should be about 'supporting strong, vibrant and healthy communities' as well as improving biodiversity and contributing to a low carbon economy. The community's 'health, social and cultural well-being' should be a strong consideration in any understanding of sustainable development.

Finally, the NPPF makes the important point that these dimensions within the definition of sustainable development should not be seen in isolation because they are mutually dependent and it is entirely clear that cherry-picking from the NPPF is not an appropriate strategy in that all planning for sustainable development should manifestly provide identifiable economic, social and environmental gains to improve the lives of people and communities (paragraph 8)

### **The Appeal Site: Hassall Road**

Turning then to the specifics of the Appeal site: How well does it do in identifying such benefits? For the community as a whole the development brings no significant benefits and it seems to me that the onus of proof lies with the Apellants who have, to date, failed to persuade anyone who does not have a direct financial interest that such a development would enhance anything for the town of Alsager.

We might make the point also that the site is not included in the Town Strategy and does not conform to its core principle of Brownfield Development first.

In addition, the development of the site would have a negative impact upon the internal traffic infrastructure of Alsager with access roads that are already not fit-for-purpose in that they are narrow, often dangerous, sometimes without footpaths, poorly-maintained and inadequate to support further residential housing in this location. These are not things that could be put right by 106 Agreements. Owing to the location of this site, the additional houses will increase carbon emissions as it will be necessary for all residents in the development to drive everywhere for local services and amenities as well as increasing delivery traffic to the site. It is difficult to see, then, how the development of this site contributes to a low carbon economy or to the health and well-being of the community.

I would argue that the Appeal site needs to be seen in the potentially cumulative context of at least nine other not dissimilar sites in the Town. By one count, it is estimated that, if all of the Development Companies like the Appellants were to gain planning permission, then Alsager would have an additional 2930 residential homes. This provides some considerable justification for the argument that what should drive sustainable development in Alsager is the Town Strategy and the Cheshire East Local Plan rather than *ad hoc* and totally uncoordinated speculative development. It should be absolutely clear that this is **NOT** what the NPPF had in mind when it argues for the presumption in favour of sustainable Development.

## **Conclusion:**

### **To sum up:**

- **The adopted Town Strategy cannot be cherry-picked on a highly selective basis in a way that is biased and convenient for the Appellants without proper consideration of its core principle and its implementation through the emerging Local Plan**
- **In particular, it is not appropriate to dismiss or ignore the core principle of Brownfield development before Greenfield in the specific context of Alsager and its available Brownfield sites. It is also not acceptable to all those of us who were involved in the democratic processes that developed the draft Town Strategy into the Adopted Town Strategy, finally approved by democratically-elected representatives, to find that arguments are being legally mounted that ignores or sets aside those processes as if they are inconvenient and irrelevant details.**
- **As had been acknowledged repeatedly in this Inquiry already, Alsager faces serious infrastructural problems already in terms of employment, education and training in addition to its problems of healthcare, transport and social care provision for the elderly. Nothing should be done to**

**exacerbate these problems; the focus of planning policy should be on strategies to address them clearly and with long term benefits in mind rather than short-term gain.**

- **The proposed site would be outside the identified Settlement Zone (SZL) and constitute an intrusion into the open countryside that is unacceptable to the community.**
- **It would also exacerbate internal transport infrastructure problems in ways that could not be ameliorated**

Neither I nor any of my colleagues are against Development. What we want to see is development that is strategic for the community as a whole; development that is in the right place at the right time with the right design and with clear objectives to deliver economic, social and environmental benefits. I am well aware that Lord Young amongst others in the Conservative Party believes that Localism leads to Nimby-ism. This is a charge that is often made with the simple purpose of marginalising or ignoring perspectives that are inconvenient. It is a classic tactic that is often used to undermine the credibility of perspectives that may be different from those that are privileged or dominant.

In the specific context of Alsager, for those of us who care about our community, Nimbyism is an irrelevance and would make no sense whatever in the planning of our community for future generations. What does make sense to us is the Ministerial Foreword to the NPPF:

***Sustainable Development is about positive growth – making economic, environmental and social progress for this and future generations....Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.***

I guess this last objective is why so many people living in Alsager turned out to contribute to the debates around the Town Strategy. They found no evidence that the proposal identified by Seddons for Hassall Road contributed any improvement or enhancement for our community in social, economic or environmental terms and, therefore, it does not qualify for consideration as a sustainable development.

Thank you

**Derek Longhurst**