

Local Plan: Pre-Submission Core Strategy document

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Introduction

The coalition government's **National Planning Policy Framework (NPPF)** requires that all Local Authorities should publish a **Local Plan**. The central purpose of this Local Plan is to determine the spatial location for development in a region to generate economic growth. The government's policy has created a 'presumption' in favour of development and it also requires that Local Authorities are able to demonstrate that they have allocated five years of housing land for development.

While there is no Local Plan approved by the Government's Inspectorate and if the Local Authority cannot demonstrate five years supply of housing land, there is a significant chance that Inspectors will approve construction on sites that have been rejected by their communities, Town Plans and even the Local Authority. Predominantly, these are likely to be Greenfield sites as Developers can make greater profits on such sites. Our Greenfield and open space is, therefore, under threat from speculative development driven by corporate greed rather than by coherent and strategic development across a community.

The Local Plan: Pre-Submission Core Strategy

The most recent stage in the Local Plan development by Cheshire East Council is the publication of the above-named document. As it is long, complex - and full of Planning PR-Speak jargon - this analysis provides residents with

- An account of its key arguments
- An analysis of the potential impact upon Alsager as a community

This analysis includes an outline of a supporting document: **The Infrastructure Delivery Plan** which is said to underpin the Core Strategy.

Executive Summary

The analysis concludes that

- The Core Strategy purports to be about 'jobs-led growth' (Foreword). **There is no evidence whatever of jobs-led growth in relation to Alsager. This is a Core Strategy that is focused on the regeneration of Crewe and investment in Macclesfield**
- The Core Strategy defines four **Strategic Priorities (Section 6: www.cheshireeast.gov.uk/localplan)** and five **policy principles (paragraph 1.8) www.cheshireeast.gov.uk/localplan)**. Based on the evidence

of what is proposed for Alsager and what is ignored in relation to the community, **these principles and priorities have not been applied in relation to Alsager.**

- It is important that our approach to this analysis is not a 'nimby' one (i.e 'not in my backyard – but someone else's is fine!) and ARAG has never been an organisation that has taken this position. It is important, therefore, to acknowledge that **Sandbach and Congleton as well as Alsager are bearing the brunt of the approach taken by Cheshire East Council to the development of this Local Plan.**
- Alsager is, however, almost unique in this Core Strategy in that the Infrastructure Delivery Plan reveals that Cheshire East Council **has no coherent plan for investment, growth or infrastructural development in this community**
- Not only, however, is there no plan for growth or infrastructural development but it is clear that **Cheshire East Council is also planning to strip existing 'assets' out of Alsager as revealed in its Infrastructure Delivery Plan with regard to the future development of the MMU site. (Core Strategy, Para. 15.185)**
- The experience of the community in Alsager is that Cheshire East Council has developed the worst kind of 'top-down' approach in living memory in its development of the Local plan contrary to the Localism Act and the government's commitment to a more community-led approach to development. **The analysis and evidence suggests that the Council's consultative procedures are just that – procedures rather than real dialogue – and therefore, it is unlikely that there will be 'ownership' of this core strategy across this community.**

What can you do about this?

You can register your comments and objections to the document (www.cheshireeast.gov.uk/localplan) . **You can question the 'soundness' of the document on whether it is, in your judgement:**

- **Justified** (founded on a proportionate evidence base and the most appropriate strategy when considered against the reasonable alternatives);
- **Effective** (deliverable and based on effective joint working on cross-boundary strategic priorities);
- **Consistent with national policy** (predominantly set out in the National Planning Policy Framework); and
- **Positively prepared** (the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)

To assist you in reaching your judgement on these issues, the summary below is offered as a digest of the Core Strategy's implications for our community of Alsager.

Strategic Priorities

There are four **strategic priorities** outlined in Section 6 of the Core Strategy document:

- **Promoting economic prosperity by creating conditions for business growth**
- **Creating sustainable communities, where all members are able to contribute and where all the infrastructure required to support the community is provided**
- **Protecting and enhancing environmental quality**
- **Reducing the need to travel, managing car use and promoting more sustainable modes of transport and improving the road network**

For more detail on these four strategic priorities you can click **here** (www.cheshireeast.gov.uk/localplan)

Policy Principles

The document outlines five **policy principles** that are said to underpin its 'vision':

- **Develop 'brownfield' sites, where possible, before incursion into Greenfield, Greengap, Open Countryside or Greenbelt**
- **Ensure a 'town centre' first policy to support our main urban centres and deter out of town development**
- **Deliver new homes of the right quality, in the right location at the right price – providing access to low cost and affordable housing to support our growing economy**
- **Support new development with the right new infrastructure – our plan proposes at least eight miles of new roads and substantial upgrades to our overall transport network**
- **Focus new housing development in strategic locations through the creation of three 'new sustainable urban villages' rather than a 'dispersed' growth model which will undermine the well defined character and strengths of our market towns and smaller villages.**

In the light of the above priorities and principles it would not seem an unreasonable approach to examine how they are articulated in relation to the community of Alsager as a 'Key Service Centre' and one of the above-mentioned market towns.

What is proposed for Alsager?

The original 'top-down' allocation for housing development in Alsager for the next twenty years was 1000-1100. This has now been raised to 1700 in this document although this figure could be

significantly conservative given the number of Developer Appeals currently in process. Some realistic estimates would place this figure between 2500 and 3000 house.

The major new element in the Local Plan process is the imposition by Cheshire East Council of **White Moss Quarry** as a **strategic location within the Core Strategy**. This will mean that any application for development at this location will be able to cite the Local Plan as a material consideration in seeking planning permission. In other words, Cheshire East Council has 'opened the door' for such an application to be made – as indeed it has.

In this context, it is interesting to note that the Core Strategy document describes White Moss as a strategic location – not a site whose boundaries are clearly-defined – but then goes on to refer to '*the proposed scheme*' which can only refer to the Application that has been made and its retention of hedgerows and field systems. This clearly suggests, therefore, that the depiction of this 'strategic location' in the document is NOT defined by Cheshire East Council itself but by the Developer. **Residents need to decide whether they deem this to be an appropriate way of proceeding in a document from their elected representatives? Indeed, it is possible that there are legal issues involved in this 'slippery' confusion in that it appears to be 'advocating' the current application prior to the conclusion of the Consultation process or to any decision-making process regarding the Application.**

It should be noted that the Core Strategy proposes a development of 'up to 750 houses' while the current application is for 1000 houses. The Flood Assessment documentation for the current application even refers to 2000 houses. In any of these scenarios, this means the location of a massive development on the edge of the Alsager community. To propose to locate a care development on this site and not one fit for 21st century life suited to the needs of the elderly for independent living on the MMU site is absurd.

It is fairly clear that this new element has been introduced by Cheshire East Council because it has recently been judged by the Inspectorate NOT to have a five-year supply of housing land and Alsager is to be the scapegoat for this failure. Secondly, residents need to decide whether they think this development represents any attempt whatsoever to deliver houses of the right kind in the right location, bearing in mind the proximity to the M6 of this site with known levels of noise pollution and currently unmeasured forms of other pollution (nitrogen dioxide, particle diffusion etc).

Development of White Moss as a strategic location is in breach of Strategic Priorities 3 & 4 and does not implement Policy Principles 1,3,5 as outlined in the Pre-Submission Core Strategy document.

In addition to White Moss, the Core Strategy continues to include

- Housing Development on the former MMU site (300-350 houses) with little sign that there are any coherent plans for other kinds of development of the site (the 'sports hub', homes designed to meet the needs of the elderly, sport and recreation). Given that ARAG, with much support from the Alsager community, has developed serious plans for the community use of this site, it is interesting to note that Cheshire East Council has removed the original references to the potential for on site education in this document. This simply provides further evidence, if it were needed, of the inability of Council Leaders to listen responsively to our community and to support 'bottom up' development when it is coherently presented to them. Indeed, in the Core Strategy document we find that **existing sports facilities in Alsager will eventually be replaced by such facilities in Crewe** (Para. 15.185) We will return to the MMU site when we review the Infrastructure Delivery Plan produced by Cheshire East Council.
- Twyfords and Cardway (550 new homes): Residents may wish to note that there is reference to 'small scale local retail development' in the outline of this location and no mention of the Sainsbury's Application currently being considered. **You may wish to indicate your support for the Sainsbury's proposal if you believe that it will bring jobs and investment to the community as well as reducing outward bound commuting to supermarkets elsewhere. In the context of actually living in Alsager as a resident, Policy Principle 2, which endorses a simplistic position of deterring 'out of town development', seems perversely nonsensical. Newcastle Borough Council has registered 'no objection' to the Sainsbury's Application.** (Planning Committee 19.11.2013; Agenda Item 5)
- It is clear from the Core Strategy that Cheshire East Council itself has no strategy for jobs, employment, growth or investment in Alsager. Its sole gesture towards this priority is the allocation of 'employment land' at Radway Green on land no longer required by BAE Systems. It is well-known that the simple allocation of land in itself is NOT a coherent or successful strategy for 'jobs-led growth' and there are even examples in this document in the Macclesfield area where such an approach has demonstrably failed to deliver. It is interesting to note that the Planning Committee of Newcastle Borough Council has commented on this proposal that it will need Cheshire East Council to 'remain committed' to the development if it is to be successful (Newcastle Planning Committee Report, 19/11/2013, Para. 6.2). Unfortunately, there are few grounds for any optimism that this will be delivered given the Infrastructure Delivery Plan analysed below.

In sum, then, the original allocation of 1000-1100 houses over the next twenty years could be delivered by the development of the brownfield sites as designated in the adopted Town Strategy, especially taking into account the development already under way on Crewe Road. But the community is now being asked to bear the brunt for the Council's failures by delivery this allocation PLUS 750-1000 houses on White Moss PLUS any

Development that is approved on appeal by the Inspectorate. There are still at least **six sites in Alsager on which decisions are pending.**

Area of Restraint

Alsager is defined as within the 'area of restraint' for housing development in relation to the Cheshire East proposals owing to the proximity to the North Staffordshire/ Potteries region and its plans for regeneration. The purpose of this 'restraint' is to reduce outward migration from North Staffordshire into South Cheshire and address the commuter traffic currently using the M6 and A500 owing to the separation between employment opportunities and housing.

This was an issue addressed in a recent Inspector's Report on proposed Development at a Sandbach Road North site. He advises 'caution in decision-making' (para. 66) in this part of the borough owing to the potential for neighbouring authorities to 'object' to development in Alsager – as indeed they have in relation to White Moss and other speculative developments on Close Lane and Dunnocksfold. (Newcastle Borough Council Planning Committee; 19/11/2103 Agenda Items 6,14,15,16). The Borough Council objects to all of these proposed developments on the grounds that they 'would undermine the delivery of the Newcastle-under-Lyme and Stoke-on-Trent Joint Core Strategy'. Cheshire East Council has, under the requirements of the NPPF, a 'duty to cooperate' with these neighbouring Local Authorities and you would expect that the Council had taken serious note of the recommendation of the Inspector's Report in relation to Alsager. In this context, therefore, it again, seems perverse to locate such a high level of housing development, without adequate infrastructural support, in the community of Alsager which will generate even higher levels of outward commuting.

The Infrastructure Delivery Plan

This is an important supporting document for the Core Strategy. It is in this document that we can find the detail of the Council's strategy for implementing its four priorities and fulfilling Policy Principle 4. (please see above).

A close scrutiny of the Infrastructure Delivery Plan reveals

- That there has been no significant recent investment in the Alsager infrastructure (Para. 6.6). At recent appeals Alsager was declared by Cheshire East Council Officers to be 'unsustainable' mainly in terms of its road infrastructure and significant loss of jobs over the last decade. If the infrastructure is currently inadequate for those living in the community, it is unclear how doubling its housing development will address this problem?
- The document says nothing about 'jobs-led growth' or indeed any other form of 'growth' as far as Alsager is concerned. Where growth

is discussed in the document Alsager is notable by its absence (e.g Para. 5.22 and elsewhere)

- Table 4 of the document reveals that Cheshire East Council has no coherent strategy or income sources allocated for investment in the infrastructure of Alsager
- In each case where Alsager is mentioned the source of any funding is said to be Developer contributions and in each case there is a funding gap
- The overall funding gap – ‘the difference between the cost of the infrastructure and the amount of funding available for it’ – is in the region of £230,000,000 (Para. 7.1). At least the document realises that sources of income other than Developer Contributions will have to be found

Taken together, this suggests that Cheshire East Council does not have a strategy or capacity to deliver its Policy Principle 5 of delivery the ‘right new infrastructure’ to support the Plan proposals. The Core Strategy document does contain some vague and general references to, for example, road improvements linked to specific developments but these do not amount to a ‘strategy’ and suggest a piecemeal *ad hoc* approach.

Roads and Transport

This is a key area for the community as the Core Strategy, if implemented in its present form, will not preserve the identity of Alsager as a market town as the document claims. It will transform Alsager into a commuter town off the M6 with outward commuting contributing to even greater pressure on this congested section of the M6 as well as increasing carbon emissions and pollution in direct contravention of **Strategic Priority 4 and Policy Principle 5**.

The Infrastructure Delivery Plan

- Confirms that Junctions 16-18 of the M6 are so congested that permission has been granted for hard shoulders to becoming running lanes (Para. 6.9), making this an eight lane motorway section. It is also admitted that this section of the motorway will need yet further development. None of this suggests that White Moss is a sensible strategic location for a major development and it beggars understanding to see how this could be judged to be ‘the right place’ for a new development of this magnitude.
- Reveals that Cheshire East Council believes there to be only three minor pinch points in the internal road infrastructure of Alsager: Junctions of Crewe Road/Sandbach Road North; Linley Lane/Crewe Road and the mini-roundabout on Hassall Road/Dunnocksfold Road. These are currently said to be ‘operating within capacity’ (Para.6.9) but might be problematic with the development of Twyford and the MMU site.

Residents can judge for themselves whether they deem this to be a reasonable analysis of the internal road infrastructure of Alsager. It is

clear that an independent highways analysis and pollution measurement study is required if such perspectives are to be challenged.

Health

There is no clear strategy on health and public well-being and the document admits that there is **'an overarching inability to at present identify future housing development related health care and infrastructure'** and **'it is not yet possible to produce a schedule of capital projects.'** (Para.6.41)

Waste

The document acknowledges that there is a shortage in capacity at the Alsager Wastewater Treatment Works – which should, of course, be a material consideration in any future development. The document makes it clear that the responsibility for addressing any such problems – along with costs (currently undisclosed) – lies with United Utilities.

Education

In Alsager there is said to be **'a surplus in primary school places, additional students will use all the surplus places available and create a shortfall in the area'** (Para. 6.37) In **Table 5** of the document it is suggested that Developers will fund the equivalent of five new classrooms and a new School (White Moss). There appear to be no plans or implications for the provision of secondary education in the community.

Leisure Facilities

There has been significant community debate about the potential development of the former MMU site. In the light of this debate it is bizarre that the document declares that the **Community Infrastructure Levy (CIL) will give 'local communities flexibility to choose what infrastructure they need to deliver their environmental plan'**. (Para.3.1)

Contrary to the community plans that have been put to the Council over the last 10 months for the use of the MMU site, there are no indications that the Local Plan will deliver a 'sports hub', community recreation facilities or homes designed for older members of the community. There is even a suggestion in the Core Strategy that existing sport facilities will be closed down in Alsager and developed in Crewe. Paragraph 15.185 of the Pre-Submission Core Strategy document states: **'The sports hall, gymnasium, changing rooms and playing fields remain in use, but will be provided in Crewe in coming years'** (emphasis added).

The Infrastructure Delivery Plan indicates that the Council will look to 'retain the existing facilities and swimming pool but enhance and improve them in the future by negotiating capital contributions from any future planning applications. This additional funding would be used to enhance

and add additional capacity particularly in respect of the swimming pool and the health and fitness offer' (Para. 6.48) In Table 5 of the document this is identified as 'Extra Pool lane and additional health and fitness accommodation and improvements to main entrance and reception area.' The Table also indicates that there remains a £1.5 million funding gap.

In other words the Local Plan 'sports hub' in this document becomes identified with some improvements to the Council's own facility of the Leisure Centre and its Trust. There is no mention of the publicly -funded sports facilities on the MMU site or the playing pitches and their potential use for the community of Alsager.

The Library

Cheshire East Council is proposing to reduce **'the cost of the library and asset burden through, for example, relocating libraries to community buildings and for libraries to be handed over to and run by the community (community libraries....these changes are not directly related to new housing provision and will not require developer contributions.'** (Para. 6.44)

A survey is currently under way and it is unclear in the document whether there will be any impact on Alsager but we may suppose that this may be comparable to the transfer of the Civic Centre to the Town Council with all of the attendant costs passing down to the community. We should note that there is a duty on Local Authorities 'to provide a comprehensive and efficient library service to all who live, work or study in the area (Para. 6.43)

Affordable Housing: The Housing Crisis?

We are consistently told that there is a 'housing crisis' and that the country is not building enough homes for people to get on the housing ladder. There is 'a truth' in this – but not in South Cheshire. It is clearly the case that people cannot get on this ladder in London and the South-East; there are also significant problems for people in high growth employment areas such as Cambridge or Bristol.

But this is not the point really.

Cheshire East Council has a Policy SC5 on Affordable Housing. This sets a requirement of 30% affordable housing for each approved development – but this is commonly not what gets delivered. National research has shown that up to 60% of Agreements on affordable housing are not delivered by Developers. Following Planning Permission, inclusive of 30% of affordable housing, Developers undertake a viability analysis – not open to public scrutiny - which includes a range of profit margins. These margins are reduced by affordable housing and, therefore, it is not

uncommon for Developers to declare the application to build as non-viable if they are required to provide 30% of affordable houses. The consequence is that there is often a negotiated arrangement to reduce the affordable housing to a level as low as 10%. There are examples locally of such adjustments. And it is clear that Developers will deliver the lowest level of affordable housing possible as they make higher profit from three and four-bedroom 'market' properties.

The Pre-Submission Core Strategy includes reference to a Viability Study that was conducted for Cheshire East Council. On the basis of this study the Council is proposing that some kind of economic viability study will be required especially in the case of brownfield development as Developers argue that, owing to contamination and site preparation, they make less profit on such developments. This is questioned in the Cheshire East Viability Study undertaken in 2010. It remains to be seen, then, what form such a viability assessments will take, whether it will be fully independent of Developer influence and open to public scrutiny.

The Economic Viability of Affordable Housing Requirements

This report was produced for Cheshire East Council in 2010 when market conditions were quite different. As the Council is justifying its approach to affordable housing on this report, it is interesting to note what it says:

- Assuming a profit margin of 15% for the Construction Company all of the sites bar one remained viable with 30% affordable housing (Para. 5.6)
- The sites only became non-viable when the level was raised beyond the tipping point of around 35% affordable housing (Para.5.9)
- This remains true for brownfield sites and the report makes the useful observation that this is an issue that should be addressed in terms of the cost of land acquisition (Page 9; Bullet Point 5; Para. 5.24)
- The report makes it clear (Paras. 5.20-5.24) that the policy of 30% of affordable homes only becomes 'non-viable' when Construction Companies (and possibly their banks) require profit margins of 20%-25% (Para. 5.52). In this case, the tipping point would be reduced from 35% to 25%. It is hard to avoid the conclusion that ordinary people, especially those who are striving to get onto the property ladder, would be paying the cost for corporate greed yet again.
- Finally, the report argues that there are no grounds for differentiation across the region and that the 30% policy should be applied consistently (Para.5.14)

The report does indicate that market conditions may well change (e.g. Para. 5.18) between 2010 and 2013 – as indeed, they have in relation to house prices – and that their report may need to be reviewed and the general context carefully monitored (e.g. Para. 5.19). The Report does recommend that the Council gives itself a level of 'flexibility' in assessing the level of affordable housing and it can be assumed that this is what has informed the current proposal to introduce some kind of economic viability

test in relation to Brownfield sites. While the report does suggest that additional costs on brownfield sites 'can have a significant and negative impact on viability' (Para. 5.24), this is by no means a foregone conclusion. As we have seen, profit margins play a significant role in viability assessments as do S106 Agreements (Developer Contributions to infrastructure), lower costs of purchasing Brownfield sites, deferred payments for land purchase. Indeed, the report states that changes to 'the timing of payments has a dramatic effect in improving the viability of schemes.

Conclusion

The Infrastructure Delivery Plan provides evidence that there is no coherent investment plan for Alsager to provide the 'right new infrastructure' to support the Core Strategy proposals. Indeed, it undermines the credibility of the core strategy by demonstrating that much of it is mere rhetoric especially in relation to the following key issues:

- 'Jobs-led growth'
- Green Infrastructure
- Pollution and Environmental issues
- Preserving the identity of the region's market towns
- Reducing or managing car use

It is not possible to support a Core Strategy that falls so far short of fulfilling its own designated principles and priorities in relation to this community. It is surely not unreasonable to argue to Cheshire East Council that, if it sets Strategic Priorities and Policy Principles within the Local Plan, it is fair to assume that these will be applied consistently across the region.

Overall, it would be reasonable to expect a Core Strategy that was fair and equitable in which so-called 'tough decisions' were justified in a clear and logical way. This document is divisive across the region and unconvincing. There is certainly nothing in it that could be presented as positive or optimistic for the future of Alsager.