

Introduction

ARAG (Alsager Residents Action Group) is an Alsager residents organisation with over 1,500 members.

This document contains ARAG's statements on the Cheshire East Local Plan. There are some general points which apply to the impact of the plan on Alsager and points which are specific to the White Moss and MMU sites.

At the end of this document are a chart and a picture of housing allocation around Alsager, which demonstrate the scale of unwanted development around the Town. This document addresses points: 14.4 Alsager General, 14.4 SL5 White Moss and 14.4 CS13 MMU.

General Points

The most general point to be made about this Local Plan, concerns sustainability and consistent application of policy. In the recent spate of planning appeals concerning Alsager, Cheshire East has stated that Alsager itself is not sustainable from the points of view of employment and infrastructure, in particular highways. Despite strongly defending this position, Cheshire East has unilaterally imposed unjustified additional housing on Alsager with no attempt to improve the levels of local employment or the infrastructure. Furthermore, Messrs Pickles and Boles have informed us that some weight would be given to the emerging local plan and clearly this has not been the case, either by the Planning Inspectorate or Cheshire East. A Local Plan and its policies only have value if they are applied consistently. Evidence to date suggests that in Alsager's case the overriding policy is to allow as much housing as possible and policies have been ignored whenever convenient.

Legal Compliance

The Local Plan is NOT legally compliant in that it does not consistently apply the NPPF definition of 'sustainable development' (NPPF, Paragraph 7). This requires the mutual interdependence and integration of economic, social and environmental factors. This can be seen, for our community, most obviously in the imposition of White Moss 'Quarry' – including surrounding agricultural land – in Alsager as well as the bizarre decision to approve planning permission for the adjacent Rhodes Field site.

Whatever the Local Plan claims, in practice its preparation has breached many of the **Core planning principles** outlined in NPPF (paragraph 17). In particular, planning development in Cheshire East has not been

- Genuinely plan-led, empowering local people to shape their surroundings...

Nor has it been a 'creative exercise in finding ways to enhance and improve the places in which people live their lives.' Most particularly, the impact of this local plan will not

- Support the transition to a low carbon future in a changing climate
- Contribute to conserving and enhancing the natural environment and reducing pollution.

Its preparation has not included taking 'account of' and supporting 'local strategies' to improve infrastructure. Indeed, it is possible to argue that the requirements of the Localism Act in general have played no part whatsoever in the preparation of this Local Plan. Much of the process of preparation is widely regarded as the worst kind of 'top-down' decision-making and even a 'lottery' as a consequence of the Local Authority's failure either to develop a coherent strategy that commands widespread support or to be able to demonstrate successfully that it can provide a five-year supply of housing land.

The evidence for arriving at these conclusions can be found in the Local Plan proposals for the Key Service Centre of Alsager and this will be addressed more fully in analysis of the Local Plan's 'Soundness' and the implementation of the 'Duty to Cooperate' with neighbouring authorities. The cumulative impact of all of the development now planned for Alsager has been inadequately assessed by the Local Authority. The overall effect of these proposals will be to worsen rather than address some of the issues concerning the future of this community: poor infrastructure; lack of employment; out-commuting; carbon emissions and pollution off one of the most congested sections of the M6 as well as the A500.

The failure of the Local Authority to address the infrastructure requirements of Alsager – as required in NPPF paragraph 21 – can be found in the 'Infrastructure Delivery Plan' supporting the Local Plan. This offers no coherent strategy for infrastructure development in this particular community other than piecemeal and unspecified CIL-funded work to enhance the capacity of a few road junctions (**Infrastructure Delivery Plan, page 23, page 30**) which does not address the total road transport infrastructure in a community that is set to grow by, minimally, 27% through these Local Plan proposals – the highest percentage growth of any community in the region.

When the new permissions and lost appeals are taken into account, this growth is anticipated to be in excess of 50%. See attached chart.

The imposition of the White Moss as a Strategic Location by Cheshire East Council runs counter to all Local Community and Town Council objections and constitutes a significant evidence base for the comments above regarding legal compliance both with the NPPF and the Localism Act. This

is not about 'nimbyism' from within this particular community as there is widespread support for development of 'the right type... in the right places' (NPPF, paragraph 7) such as the Twyford and Cardway sites: it is about pollution, carbon emissions, noise and air quality given the proximity to the congested section of the M6. To be specific the inclusion of this site does not conform to the agenda set for 'Conserving and enhancing the natural environment' in paragraph 109 of the NPPF especially given the proximity of a RAMSAR site.. There is also no evidence that the Local Plan has taken account of the **Planning Practice Guidance** issued by DCLG in March 2014 regarding the '**role of Local Plans with regard to air quality**' (**Paragraph:002 Reference ID: 32-002-20140306**). This is particularly significant with regard to the White Moss location as there would need to be independent critical assessment of

- *The potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments – **relevant to the Alsager Local Plan proposals***
- *The impact of point sources of air pollution (pollution that originates from one place – **the proximity of the M6 to the White Moss site.***

Soundness

The Local Plan clearly states its 'Vision for Key Service Centres' (Local Plan, page 66):

*The Key Service Centres will see growth, with high quality homes and business premises provided to meet local needs, where smaller independent traders and tourism initiatives will continue to thrive **and where all development will contribute to creating a strong sense of place.***

There is little evidence that this 'vision' applies to the Local Plan proposals for Alsager as a community. The same argument can be made regarding Cheshire East Council's Policy PG 2 in which it is claimed that for Key Service Centres development will be of 'a scale, location and nature that recognises and reinforces the distinctiveness of each individual town ...to maintain their vitality and viability' (Local Plan, Page 67). In fact, the overall impact of this Local Plan will be to exacerbate existing problems within this community acknowledged elsewhere in the Local Plan (Paragraph 2.4) of out-commuting and lack of employment opportunities. This Local Plan will, therefore, turn Alsager into a commuter town off the most congested sections of the M6 and A500.

It is claimed that 'The Local Plan Strategy is one of jobs led growth...' (5.6) but this is clearly not a strategy that has been applied to Alsager as a community. The allocation of employment land (Radway Green) does not constitute a strategy for jobs-led growth especially when the Local

Plan refers to the fact that the site may have attractions for the Logistics sector (15.208) which could bring yet more congestion and pollution and few jobs for the community.

In this context it is impossible to confirm that the Local Plan proposals for Alsager persuasively implement or manifest the **Strategic Priorities** outlined in Section 6 of the document. In particular, the priority of '**Reducing the need to travel, managing car use and promoting more sustainable modes of transport and improving the road network**' is completely contradicted by the planning decisions already taken about Alsager and emphatically does not apply to the imposition -*additional* to such development much of which is in breach of Policy PG5 (**Open Countryside**) - of the White Moss Strategic Location.

The Local Plan is also unsound in that it does not seek to address the impact of the eight additional housing sites in Alsager that have been approved or are currently under appeal during the extensive period when the Local Authority's claims to have provided a five-year supply of housing land have been disproved following examinations by the Inspectorate.

In this context, the imposition of White Moss is adding insult to injury and it can no longer be assumed that anything like 350 dwellings on the MMU site (Cheshire East Local Plan) or 450 (the University's stated maximum) will be deliverable. Such a high level of development on this site will certainly not have the support of the local community which has already seen its creative and deliverable proposals for this site marginalised, blocked and ignored by Cheshire East Council Leadership despite the backing these proposals had from global employers and independent agencies. More evidence about this matter could be discussed during the Public Examination of the Local Plan document and provides an evidence base for the lack of compliance with the Localism Act in the Local Plan's preparation.

It is also notable that the Local Authority is seeking to enhance its own Leisure Centre facilities through arrangements for development on the MMU site but signals intent to asset-strip such existing community facilities as currently do exist:

The sports hall, gymnasium, changing rooms and playing fields remain in use, but will be provided in Crewe in coming years. (paragraph 15.199)

These facilities would be highly valued by the community and were built and maintained originally by the taxpayer.

Finally the *Infrastructure Delivery Plan* does not create any confidence in the implementation of **Policy IN 1 – Infrastructure (Local Plan 10.2)**. This makes the claim that '*Infrastructure delivery will take place in a co-ordinated manner guided by the Infrastructure Delivery Plan.*' With regard to Alsager, that Plan creates no sense of a coherent strategy for addressing the infrastructural needs of the community as a whole

following significant development. It is, at best, a series of site-specific piecemeal arrangements wholly dependent upon CIL funding or 106 Agreements. Regular attendance at the Council's Strategic Planning Board meetings – at which key planning decisions are made – has not served to increase confidence either in the capacity for independent critical assessment of infrastructural needs or in the capacity to deliver a coordinated strategy.

In summary, then, the proposal to develop the White Moss area is highly controversial and completely unsupported by the local community. It is 'unsound' in every way, especially in terms of environmental quality, pollution, carbon emissions, congestion and increasing the need to travel and out-commuting. It is difficult to see how such a proposal manifests Cheshire East Council's **Policy SC3 – Health and Well-being**.

The adopted Alsager Town Strategy did support both Twyfords and Cardway sites and development on the brown field footprint of the former MMU site. The context for the latter site has changed significantly, however, as a consequence of the cumulative impact of a number of sites in this part of Alsager that now have planning permission or may do so in the very near future following appeal decisions. The density of the housing remains an issue on the MMU site as does the intent to remove the sports facilities in due course regardless of vague promises to create a sports hub unsubstantiated by financial commitments to maintain such a facility.

Duty to Cooperate

There is a common view (e.g. Alsager Residents Action Group; Town Council) in Alsager that Cheshire East Council has, at best, 'gone through the motions' in facilitating its duty to cooperate with the neighbouring Local Authorities in the south of the Borough. It is, perhaps, revealing that in 3.3 of the Local Plan the examples offered of the Council's 'strong and established record of commitment of (sic) collaboration and co-operation' are all located in the north of the Borough.

Alsager has long been an 'area of restraint' owing to the regeneration policies and needs of both Stoke and Newcastle. In this Local Plan Alsager has the highest proportionate growth of any community in Cheshire East and Cheshire East Council has simply ignored the objections raised to, for instance, White Moss development by neighbouring authorities. While the government's Planning Practice Guidance (March 2014) makes it clear that a duty to cooperate does not constitute a 'duty to agree', the public examination of the Cheshire East Local Plan must conduct a very rigorous scrutiny of the 'comprehensive and robust evidence of the efforts it [CEC] has made to cooperate and any outcomes achieved' (**Planning Practice Guidance Paragraph 003: Reference ID: 9-003-20140306**) concerning the south of the Borough.

Extract from the objections raised by Newcastle Under Lyme to the White Moss planning application 13/4132N and development in Alsager:

- 6.4 The scale of growth to the south of Crewe and in Alsager remains very significant, particularly when combined with the amount of development that is likely to gain consent in the near future as a consequence of Cheshire East Council not being able to demonstrate a five year housing land supply, Consequently there is a serious risk of over-provision of housing to the south and east of Crewe including Alsager, which if allowed to go ahead could seriously undermine the regeneration objectives of the adopted Core Strategy. Cheshire East Council should therefore be encouraged to closely monitor the level of development in this strategic area and if at the time the Core Strategy is submitted for independent examination to the Planning Inspectorate, the level of growth exceeds the planned target in this locality then Cheshire East should be asked to not to proceed with a site allocation relative to the size of the over provision.
- 6.5 Your officers consider that the Borough Council should object to the application for outline planning permission at the White Moss Quarry, on the grounds that the delivery of 1,000 homes without phasing and in close proximity to the Borough Council's administrative boundary could harm the strengthening housing market in the Kidsgrove area and work to undermine regeneration of the North Staffordsdhire conurbation.

The White Moss Site.

The White Moss site was added as a Strategic Location after the normal consultation on the Draft Local Plan – Core Strategy had been completed and the subsequent consultation was for a truncated period. Very few of Alsager’s residents were even aware and the Alsager Adopted Town Strategy had already been submitted to Cheshire East as an evidential document. The site, apart from a relatively small area, is not in Alsager, but in the neighbouring parish of Haslington, and had not therefore been given any consideration in development or consultation for the Alsager Town Strategy.

It is not surprising that the responses from Alsager residents to the proposed inclusion of White Moss, as a Strategic Location, was minimal and much has been made of the claim that, at first inspection, there were slightly more in favour than against of the thirty or so local responses. What has not been made clear is that some of those letters, counted as support, were conditional on White Moss being an ‘Alternative’ site and that support was not forthcoming if the site was to be included as additional to Alsager’s overall allocation.

Alsager Residents Action Group and the Town Council have registered total opposition to the inclusion of White Moss, in the Local Plan, to reflect the loudly voiced views of our community.

Furthermore; residents were misled by Cheshire East Officers and Members who repeatedly referred to the site as ‘Disturbed Land’ which implied that it was in a similar category to ‘Brownfield Land’. The Alsager Town Strategy had adopted a policy of ‘Brownfield before Greenfield’ and therefore the majority of residents were of the view that the proposed inclusion of this site could not be challenged. Only much more recently has the Council publicly admitted that, because the Quarry is subject to a Restoration Agreement, the whole site must be classified as ‘Greenfield’.

The White Moss site is clearly unsustainable in a number of areas as follows:

- The site fails to bring any employment growth opportunities to Alsager, and any suggestion of economic growth being provided by the actual building of dwellings as already been rejected in Inspectorate Decisions. (Cheshire East Officer’s Report to its Strategic Planning Board 20th August 2014 Ref. 13/4132N)
- On Locational sustainability the site fails to satisfy the recommendations of the North West Sustainability Checklist against all but 3 of the criteria, all but 2 of which are significant failures. Key services like a Pharmacy, Post Office, Medical Centre, Community Centre and Super Market are all in excess of 2.5 km from the White Moss site. Even the local Secondary School is 2.3

km from the site. (Cheshire East Officer's Report to its Strategic Planning Board 20th August 2014 Ref. 13/4132N)

- The site is Environmentally unsustainable, on the grounds of Air Quality and Noise pollution, because of the immediate proximity of the M6 Motorway which was carrying 117,611 vehicles per day in 2007, including almost 23,000 heavy goods vehicles.(Cheshire East Core Strategy: Sustainability Appraisal Scoping Report - page 145). Traffic volumes have increased significantly during the last 7 years and in recent months the government has approved '4 lane operation' over this section of the M6 motorway. A report previously provided by the quarry operator, and those submitted more recently by the site developer, demonstrate that outdoor noise levels are significantly above the 55db(A) Leq, 16hr maximum required to avoid significant community annoyance. The World Health Organisation reports that "one in five Europeans is regularly exposed to sound levels at night that could significantly damage health" levels of noise from the M6, in excess of 70db have been measured on this site, which is approaching 4 times the volume of the recommended limit. Similarly, air quality assessments have shown that the site would be exposed to pollution concentration levels above the national nitrogen dioxide (NO₂) health based standard primarily due to emissions from the M6 Motorway. Particulate pollution, which is significantly more dangerous to health, has not been adequately assessed and is the cause of considerable concern in the local community.
- The site is unsustainable on Highway grounds because increased traffic volumes, from Local Plan Strategic Sites and the already approved 541 dwellings from Speculative Greenfield Developments, will cause increased queueing from the railway crossing, on Radway Green Road, and block the passage of traffic on Crewe Road. This road blocking situation already happens at peak times and traffic counts, together with photographic evidence showing this, were supplied to Cheshire East planning department and are available on their web site. The information was provided in an Independent Traffic Survey, commissioned by Alsager Residents Action Group and paid for by voluntary public subscription.

Suggested changes to the Local Plan.

- The White Moss Strategic Location (SL5) should be removed.
- There would not be a need to find an alternative location as Alsager has already had suffered more than 500 additional dwellings which have been given planning permission on greenfield sites. 227 of these sites have been approved on appeal since the Local Plan was submitted to the Secretary of State.

The MMU Site.

It is very difficult for Residents to understand how we could have gone from a position where a robust Local Plan was in place, the Congleton Borough Local Plan, to one where our Community has been so damaged by excessive and uncontrolled housing allocations. The standard justification for this behaviour is the lack of a Local Plan and the position where the emerging plan or Cheshire East's claim of a 5 year supply carry little to no weight. The Town Strategy, the only document adopted by the Town Council, carries no weight at all

When considering the MMU site, it is worthwhile considering its background from the Congleton Borough Local Plan. Initially, Congleton Borough proposed a cap of 90 houses on the MMU site, to be built within the Brownfield footprint of the site. The main argument was that this represented a traffic load equivalent to that generated by the Alsager College. The Inspector determined that this cap should be limited to 160, again within the Brownfield footprint of the site. The development should be **mixed use**, including education and all Sports fields should be retained. The Inspector considered that **the infrastructure could not take more than that.**

The Alsager Town Strategy, without any justification for the increase, proposed 300 houses on the site and suggested mixed use.

Cheshire East has removed education and employment use from the mixed uses of the site, and it appears that housing development will not be confined to the Brownfield footprint of the site. The Developer anticipates that housing will be developed at the rate of 50 per annum for 10 years. At least 450 can be expected.

No consideration has been given to the cumulative effect on the infrastructure of current housing allocations, including the MMU, in Alsager (see chart at the end of this document). In recent appeals, Cheshire East has argued strongly that Alsager is not sustainable as a key service centre, both from the point of view of jobs and infrastructure. The current proposal for the MMU site is not jobs led, it does nothing to improve employment and it will destroy valuable buildings and sports / green fields.

All of the buildings some of which are high quality and would be highly valued by the community, will be demolished. These buildings have been funded from the public purse. The Local Plan also states

'The sports hall, gymnasium, changing rooms and playing fields remain in use, but will be provided in Crewe in coming years. (paragraph 15.199)'

Two of the sports field areas around the MMU have protected status in the Local Plan and the Developer has made it clear that he intends to have that status removed so that even more development can take place along the

Dunnocksfold Road frontage. Cheshire East recently lost the Dunnocksfold Road appeal for 95 houses.

It is to be hoped that Cheshire East will stick to its promise at least to protect these Sports fields.

Suggested Changes to the Plan.

1. Reduce the housing numbers to 300, the level agreed in the Alsager Town Strategy.
2. Strengthen the protected status of the identified Sports fields and ensure that these facilities remain available to Alsager Residents.
3. Re-establish the requirement for mixed use of the site including employment and education.
4. Remove the intent to relocate facilities to Crewe.
5. Preserve the best buildings for Community use.

Not included in the Town Plan – Speculative Proposals

Location	ID	No	Status	Nature
Close Lane – Rhodes Field	13/3032C	110	Approved	Greenfield
Close Lane - Muller	13/1305N	132	Approved at Appeal	Greenfield
Dunnocksfold Rd	12/4146C	95	Approved at Appeal	Greenfield
Hassall Rd (1)	12/1670C	30	Approved at Appeal	Greenfield
Hassall Rd (2)	12/3905C	34	Refused	Greenfield
Hall Drive	12/4150C	150	Approved at Appeal	Greenfield
Close Lane (Meadow View)	13/2901C	8	Refused	Greenfield
Sandbach Rd North	12/4872C	160	Appeal re-run	Greenfield
Sandbach Rd North - Hassall		60	Pre-Submission	Greenfield
White Moss (Note 1)	13/4132N	350	Approved	Greenfield
Crewe Rd 2 (note 2)	14/3054C	70	Proposal	Greenfield
Total Speculative Housing		1199		

Items Approved and in the Town Plan

Location	ID	No	Status	Nature
Crewe Road(see note 2)	12/0939C	65	Approved	Greenfield
Twyfords	11/4109C	335	Approved	Brownfield
Total allocated from Plan		400		

Items in the Town Plan not yet approved

Location	ID	No	Status	Nature
Additional on Twyfords site		215		Brownfield
MMU		300		Brownfield
Cardway Cartons		90		Brownfield
Total Outstanding from Plan		700		

Summary

Total Housing in Alsager Plan	1000
Total Housing in Cheshire East Local Plan	1250
Total Housing if all appeals are lost and Local Plan sites built	1985

+ Additional White Moss (650) + Crewe Road 2

2710

This would represent a 50% growth in Alsager over the next 20 years

Notes

1. The original White Moss proposal was for 1,000 houses. This latest amended proposal, now accepted because it was in the Local Plan, is for 350, in order to be consistent with the Local Plan. Many more than the 350 can be anticipated over time and furthermore, it will create infill for at least another 2,000 houses.
2. Crewe Road was passed before the Town Plan was published. It was a speculative proposal which was passed because of the lack of a 5 year supply. At the time of decision.

Housing Allocation Around Alsager



