

HOM 2.16 High Lane — Stockport Local Plan 2026–2042

Regulation 19 Representation – Soundness Objection

Submitted by: High Lane Village Neighbourhood Forum (HLVNF)

Date: September 2026

1. Summary of Representation

HOM 2.16 is unsound because the Council has not demonstrated that a 1,000-home allocation at High Lane is the most appropriate strategy or that it can be delivered sustainably within the plan period. The objection rests on linked deficiencies in the evidence: unrealistic or unexplained delivery assumptions for a large strategic site; a spatial strategy not shown to align with infrastructure capacity; uncoded or unsecured infrastructure; incomplete cumulative transport assessment; insufficient site-specific viability evidence; inadequate assessment of reasonable alternatives and cumulative effects; incomplete parcel-level Green Belt justification; and unresolved water, habitats and other environmental constraints. Those failures mean that the allocation is not justified or effective and, consequentially, is not positively prepared or consistent with national policy.

- **Not Positively Prepared**
- **Not Justified**
- **Not Effective**
- **Not Consistent with National Policy**

HLVNF therefore requests deletion of HOM 2.16. If the Inspector concludes that some allocation may be retained, its capacity should be substantially reduced to a level demonstrated by a fresh assessment of reasonable alternatives, site constraints, infrastructure capacity, viability and deliverability, with housing otherwise redistributed to more sustainable and better-served locations.

This objection draws on the September 2026 Regulation 19 Stockport Local Plan, Policies Map, Integrated Sustainability Appraisal, Habitats Regulations Assessment, Regulation 18 Consultation Statement, Green Belt Topic Paper, Housing Topic Paper, relevant transport and infrastructure evidence, and HLVNF's Regulation 18 response.

- The principal source documents are the September 2026 Regulation 19 Stockport Local Plan and Policies Map, Integrated Sustainability Appraisal, Habitats Regulations Assessment, Regulation 18 Consultation Statement, Climate and Nature Topic Paper, Green Belt Topic Paper, Housing Topic Paper, Infrastructure Delivery Plan and Stockport Local Plan Traffic Modelling Report. HLVNF's December 2025 Regulation 18 response is used only as earlier-stage evidence of issues raised with the Council.

This representation principally concerns soundness. HLVNF also asks the Inspector to examine legal compliance where the Regulation 19 evidence does not provide a clear audit trail demonstrating that reasonable alternatives were identified, assessed and reported on a comparable basis, or that the adopted High Lane Village Neighbourhood Plan and relevant consultation responses were taken into account. HLVNF does not allege procedural unlawfulness without supporting evidence; it asks the Council to identify the documents, assessments and decision trail on which it relies.

1.1 Evidence and delivery tests

The soundness of HOM 2.16 depends on whether the submitted evidence demonstrates a coherent, deliverable and justified allocation rather than leaving fundamental matters to later planning applications.

- **Housing trajectory and delivery:** realistic lead-in times, build-out rates, market absorption, contingency and evidence that the proposed capacity can be delivered within the plan period.
- **Infrastructure and viability:** costed schemes, provider engagement, committed funding, land requirements, dependencies and enforceable occupation triggers, tested against development viability.
- **Spatial strategy and alternatives:** a transparent common baseline for brownfield, urban-capacity, grey-belt and other reasonable alternatives, without assumptions that favour the preferred allocation.
- **Green Belt:** parcel-level assessment, exceptional circumstances, sequential testing and a reasoned balancing of harm and benefits.
- **SA/SEA and cumulative effects:** comparable assessment of reasonable alternatives and complete cumulative analysis.
- **HRA and environmental constraints:** evidence-based conclusions on water resources, recreation, air quality and protected sites, supported by credible mitigation and engagement with the relevant bodies.

If these matters are not demonstrated by the Regulation 19 evidence, the remedy requires new assessment, reconsideration of capacity or deletion of the allocation; it cannot be achieved solely through explanatory wording.

1.2 Regulation 19 policy alignment

Alignment of objections, Regulation 19 policies and soundness tests

Objection / soundness issue	Relevant Regulation 19 policy	Policy conflict relied upon	Soundness test
Disproportionate scale and rural-village impact	Strategic Policy 1: Spatial strategy (p. 16); Strategic Policy 3: Sustainable development in Stockport (p. 22); HOM 1: Delivering new homes (policy clause 2(b)–(c), p. 112; supporting paras 254,	HOM 1 requires new housing to create sustainable communities with good access to education, shops, leisure, health services and employment, together with convenient walking, cycling and public-transport options. The	Positively prepared; justified; consistent with national policy.

Objection / soundness issue	Relevant Regulation 19 policy	Policy conflict relied upon	Soundness test
	259 and 263–265); HOM 2a: New residential communities (p. 115); and HOM 2b: Site-specific requirements , including HOM 2.16 (pp. 117–133).	objection is that the spatial strategy and HOM 2.16 do not demonstrate that a 1,000-home expansion can satisfy those requirements in High Lane or remain proportionate to the village.	
Failure to align growth with infrastructure and local services	Strategic Policy 3 (p. 22); COM 1: Healthy and active across all ages (p. 25); COM 2: Community and social infrastructure (p. 27); COM 3: Educational facilities (p. 29); COM 7: Health care facilities (p. 38); HOM 1 (policy clause 2(b)–(c), p. 112; supporting paras 254, 259 and 263–265); HOM 2a (p. 115); and HOM 2b / HOM 2.16 (pp. 117–133).	The Plan’s own sustainable-community and community-infrastructure policies require development to be supported by accessible health, education and other facilities. The objection is that HOM 2.16 lacks sufficiently specific, funded and timed provision, delivery bodies and occupation triggers to show that those policy outcomes are deliverable.	Positively prepared; effective.
Green Belt / grey-belt redesignation and settlement separation	Strategic Policy 1 (p. 16); Strategic Policy 3 (p. 22); HOM 2a (p. 115); and HOM 2b / HOM 2.16 (pp. 117–133), read with the Green Belt boundary changes shown on the Policies Map.	The objection challenges whether the Plan’s spatial strategy and site allocation are supported by a consistent assessment of HL7 and HL8, including their role in the gap between High Lane and Hazel Grove, and whether exceptional circumstances and the permanence of the revised boundary have been demonstrated.	Justified; consistent with national policy.
Reasonable alternatives and brownfield-first approach	Strategic Policy 1 (p. 16); Strategic Policy 3 (p. 22); ENV 14: Making effective use of land for residential development (p. 83); HOM 1 (p. 112; supporting paras 254, 259 and 263–265); HOM	The Plan states that it has adopted a brownfield-first approach and seeks effective use of land. The objection is that the evidence does not provide a sufficiently transparent, comparable borough-wide assessment showing why brownfield and better-	Justified; positively prepared.

Objection / soundness issue	Relevant Regulation 19 policy	Policy conflict relied upon	Soundness test
	2a (p. 115); and HOM 2b (pp. 117–133).	served urban-adjacent alternatives could not accommodate more growth before allocating 1,000 homes at High Lane.	
Transport, accessibility, congestion and air quality	Strategic Policy 3 (p. 22); HOM 1 (policy clause 2(c), p. 112); HOM 2b / HOM 2.16 (pp. 117–133); ENV 8: Clean air (p. 68); and the transport policies cross-referenced by HOM 1, including INF 9 and INF 10 (see the Infrastructure chapter).	HOM 1 requires convenient and suitable travel by foot, bicycle and public transport. The objection is that the absence of rail, limited bus provision, existing A6 congestion and the lack of identified funded mitigation prevent the Plan from demonstrating a genuine choice of modes or acceptable cumulative transport and air-quality effects.	Effective; consistent with national policy.
Water, wastewater, drainage and climate resilience	Strategic Policy 3 (p. 22); CR 1: Climate resilience, mitigation and adaptation (p. 98); ENV 7: Environmental protection (p. 65); ENV 9: Groundwater protection (p. 70); HOM 1 (policy clause 2(f), p. 112); and HOM 2b / HOM 2.16 (pp. 117–133).	The objection is that the allocation is not shown to be supported by adequate water, wastewater and drainage capacity, or by funded and phased interventions capable of managing climate and flood risk throughout the development's lifetime. The evidence should include a credible mitigation strategy and confirmation from the relevant providers that growth can be supported when required.	Effective; consistent with national policy.
Mining, land stability and contamination risk	ENV 7: Environmental protection (p. 65); ENV 10: Land stability, contamination and storage of hazardous substances (p. 71); and HOM 2b / HOM 2.16 (pp. 117–133).	The objection is that the extent and consequences of recorded mining features have not been demonstrated at allocation stage to be capable of safe, viable and deliverable remediation, rather than being deferred wholly to a later application.	Justified; effective; consistent with national policy.

Objection / soundness issue	Relevant Regulation 19 policy	Policy conflict relied upon	Soundness test
Flood risk	CR 1 (p. 98); ENV 7 (p. 65); ENV 9 (p. 70); and HOM 2b / HOM 2.16 (pp. 117–133).	The objection is that mapped flood constraints and the requirement for a full drainage strategy have not been reconciled with the allocation through a clear sequential approach, site-specific mitigation, phasing and evidence that development will remain safe without increasing flood risk elsewhere.	Justified; effective; consistent with national policy.
Biodiversity, habitats, landscape and green infrastructure	ENV 1: Protection of the natural environment (p. 43); ENV 2: Enhancing nature (p. 49); ENV 3: Nature Recovery (p. 54); ENV 4: Trees, woodland and hedgerows (p. 56); ENV 5: Landscape (p. 60); HOM 8: Provision and enhancement of outdoor recreational space in new residential development (p. 143); and HOM 2b / HOM 2.16 (pp. 117–133).	The objection is that the ecological and landscape baseline for HL7 and HL8 is incomplete, so the Plan has not demonstrated that the allocation can protect and enhance nature, maintain landscape character, secure appropriate green infrastructure and avoid unresolved effects on protected habitats.	Justified; effective; consistent with national policy.
Local character, design and relationship with the adopted neighbourhood plan	Strategic Policy 3 (p. 22); ENV 13a: Local context and character (p. 77); ENV 13c: Delivering design quality (p. 81); ENV 15: Residential design (p. 85); HOM 2a (p. 115); and HOM 2b / HOM 2.16 (pp. 117–133).	The objection is that the scale and form of the allocation have not been shown to respond to High Lane’s established character or to provide a sufficiently clear policy framework for a coherent, comprehensively master-planned extension consistent with the adopted High Lane Village Neighbourhood Plan.	Justified; effective.

Reference convention: Page references are to the September 2026 Regulation 19 publication PDF. Local Plan policy requirements are identified by their numbered policy clause or lettered criterion where available; numbered supporting-text paragraphs are cited separately. For HOM 1, the relevant requirements are clause 2(b)–(c) and 2(f), with supporting text at paragraphs 254,

259 and 263–265. HOM 2.16 forms part of the site-specific policy sequence within HOM 2b at pages 117–133.

The detailed objections below should be read as challenges to both the allocation in HOM 2.16 and the ability of the cited strategic and development-management policies to achieve their stated outcomes at this location. Where the Council relies on safeguards in HOM 2b or other policies, HLVNF's case is that those safeguards must be sufficiently clear, site-specific, funded, phased and evidenced at plan-making stage to demonstrate soundness and deliverability.

2. Soundness Test A – Not Positively Prepared

Applicable test: The strategy should provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities where relevant.

Relevant Regulation 19 policies: Strategic Policies 1 and 3; COM 1, COM 2, COM 3 and COM 7; HOM 1, particularly clauses 2(b)–(c) and 2(f); HOM 2a; and HOM 2b/HOM 2.16.

HLVNF's case: The issue is not whether Stockport needs housing, but whether the submitted strategy meets that need through a sustainable distribution of growth. The Plan has not shown that directing 1,000 homes to High Lane is aligned with transport, health, education, water, wastewater, drainage and utility capacity, or with the programmes of the bodies responsible for providing those services.

2.1 Disproportionate scale of development in a rural village

The SLP proposes **1,000 dwellings** at High Lane — a **~40% increase** in the village's housing stock. HLVNF's Regulation 18 response states:

"Allocating a large-scale development (1,000 homes) to a rural village is disproportionate... It is one of the largest allocations in the SLP adjacent to one of Stockport's smallest villages."

The relevant national-policy test is whether the proposed scale and location of housing would maintain or enhance the vitality of the rural community, applying the version of the National Planning Policy Framework identified in the September 2026 Regulation 19 evidence.

The applicable National Planning Policy Framework states, at the paragraph identified in the September 2026 Regulation 19 evidence: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities."

The Regulation 19 evidence does not demonstrate that High Lane can accommodate growth of about 40 per cent without unacceptable effects on community vitality, infrastructure, accessibility, settlement character and the surrounding environment.

Consequence for the test: Without evidence that the scale and distribution of growth can be supported, HOM 2.16 does not form part of a coherent strategy for meeting housing need sustainably. It is therefore not positively prepared.

2.2 Failure to align growth with infrastructure

The September 2026 Regulation 19 Local Plan states that investment in infrastructure is required to provide the right buildings and spaces in the right locations.

High Lane is **not** such a location:

- No rail station
- Infrequent bus services
- Congested A6 corridor
- Limited employment access
- Overstretched medical and school provision

The soundness issue is not whether infrastructure effects can be considered at application stage, but whether the Council has demonstrated at plan-making stage that HOM 2.16 is deliverable over the plan period. The evidence should identify the transport, education, health, water, wastewater, drainage and utility interventions required by the allocation; quantify existing capacity and additional demand; name the responsible delivery bodies; and specify costs, committed funding, dependencies, delivery dates and occupation triggers. Unless those measures are feasible, funded and aligned with the housing trajectory, the allocation is not positively prepared or effective.

Required change: Delete HOM 2.16 or reassess its capacity and the distribution of housing through a fresh comparison of sustainable alternatives. Any retained allocation must be supported by provider commitments, costed infrastructure, funding, programmes, dependencies and occupation triggers aligned with a realistic housing trajectory.

3. Soundness Test B – Not Justified

Applicable test: The Plan should be an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Relevant Regulation 19 policies: Strategic Policies 1 and 3; ENV 14; HOM 1; HOM 2a; and HOM 2b/HOM 2.16, read with the Policies Map, Integrated Sustainability Appraisal, Housing Topic Paper and Green Belt evidence.

HLVNF's case: The Council has not provided a transparent and comparable decision trail demonstrating that 1,000 homes at High Lane are preferable to brownfield, urban-capacity and better-served urban-adjacent alternatives. The assessment of HL7 and HL8 does not clearly reconcile parcel scoring with the acknowledged reduction of the High Lane–Hazel Grove gap, or show how Green Belt harm was balanced against the claimed benefits.

3.1 Green Belt → Grey Belt redesignation is not justified

HLVNF's Reg 18 response identifies:

“The reclassification of the High Lane site from green belt to grey belt lacks a transparent and consistent methodology... The final site selection appears aligned with developer interests.”

The Regulation 19 Green Belt evidence should provide a transparent audit trail showing how HL7 and HL8 were assessed against each Green Belt purpose, how their contribution to the High Lane–Hazel Grove gap was weighed, how any grey-belt classification was reached, and why HOM 2.16 was selected over reasonable alternatives assessed on the same basis. The central unresolved issue is that the evidence records a reduction in the gap and a weakening of perceived separation but does not show how that harm was weighed against the allocation's benefits. A moderate overall assessment does not, without that reasoning, demonstrate that release of the site or allocation of 1,000 homes is justified.

The September 2026 Green Belt Topic Paper and underlying parcel assessments for HL7 and HL8 should be read together: the assessment records that the parcels do not strongly contribute to purposes A, B or D, while the HL7 narrative states that development would reduce the gap between High Lane and Hazel Grove and weaken the sense of separation.

HL7 proforma states:

“Development... would reduce the size of the gap between High Lane and Hazel Grove... weakening the sense of separation.”

HLVNF notes:

The assessment does not identify the objective evidence or site-specific reasoning supporting this conclusion. Its wording appears generic and should be reconciled with the recorded reduction in the High Lane–Hazel Grove gap and weakening of perceived separation.

The justification for HOM 2.16 must be demonstrated through the September 2026 Green Belt Topic Paper and the underlying parcel assessments. The applicable assessment criteria, findings for HL7 and HL8, relevant inconsistencies between the scoring and narrative, and the way those findings influenced the site’s selection and proposed release should form a clear and traceable decision path. Without that audit trail, the allocation has not been shown to be justified.

Consequence for the test: Without a reasoned parcel-level assessment, exceptional-circumstances case and balancing exercise, the release and proposed capacity of HOM 2.16 have not been shown to be the most appropriate strategy.

3.2 Reasonable alternatives not properly assessed

The September 2026 Regulation 19 housing and Green Belt evidence describes a sequential approach that considers previously developed land, grey-belt land and other Green Belt land.

1. Previously developed land
2. Grey belt
3. Other Green Belt

HLVNF’s Reg 18 response states:

“Urban grey belt areas with superior infrastructure have not been prioritized.”

The SLP does not provide:

- A transparent borough-wide comparison
- A sustainability hierarchy analysis
- A clear rationale for selecting High Lane over urban-adjacent grey-belt locations

To justify HOM 2.16, the Regulation 19 evidence should identify the reasonable alternatives considered and assess them against a common baseline and consistent criteria. The comparison should state realistic capacity and delivery timescales for each option, explain any rejection or reduction, and show the weight given to accessibility, infrastructure capacity, viability, environmental constraints and Green Belt effects. Without that borough-wide comparison and a traceable decision trail, the Council has not demonstrated that a 1,000-

home allocation at High Lane is the most appropriate strategy when considered against reasonable alternatives.

The Integrated Sustainability Appraisal should present the alternatives on a genuinely comparable basis, explain materially different assumptions, assess cumulative effects and provide a transparent reason for preferring HOM 2.16. Any scoring or narrative that relies on mitigation not secured by policy, funding or delivery commitments should be revisited. An incomplete or uneven alternatives assessment requires reassessment of the options and reconsideration of the conclusion.

Consequence for the test: If alternatives have not been assessed using a common baseline and consistent assumptions, the Integrated Sustainability Appraisal cannot demonstrate that the preferred allocation is justified.

3.3 Brownfield-first approach not applied

The September 2026 Regulation 19 Housing Topic Paper and supporting land-supply evidence describe the Council's brownfield-first approach.

"The council has adopted a 'Brownfield First' approach."

HLVNF's Reg 18 response highlights:

"The SHLAA sites... are not a full and comprehensive brownfield site review... A fuller assessment could be done before Reg.19."

The Regulation 19 Housing Topic Paper and supporting land-supply evidence should demonstrate that the Council applied its brownfield-first approach using an up-to-date assessment of available and deliverable brownfield capacity before concluding that HOM 2.16 was necessary. The evidence should identify the brownfield register and urban-capacity evidence relied upon, explain how deliverability and timing were assessed, and show why identified opportunities could not meet more of the housing requirement within the plan period.

The SLP has not justified why brownfield capacity was not fully explored before releasing rural Green Belt.

Required change: Reassess HOM 2.16 alongside reasonable alternatives, publish the comparative evidence and reasons, revisit the parcel-level Green Belt assessment and balancing exercise, and reduce or delete the allocation if the evidence does not support the proposed scale.

4. Soundness Test C – Not Effective

Applicable test: The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

Relevant Regulation 19 policies: Strategic Policy 3; COM 2, COM 3 and COM 7; HOM 1; HOM 2a; HOM 2b/HOM 2.16; INF 9 and INF 10; CR 1; and ENV 7–10.

HLVNF's case: The Plan has not demonstrated that HOM 2.16 can deliver 1,000 homes at the assumed rate while providing the transport and essential infrastructure required by its own policies. The identified evidence gaps concern cumulative transport effects, delivery bodies, provider commitments, costs, funding, land, programmes, occupation triggers, abnormal site costs and the developable area remaining after constraints.

4.1 Transport impacts cannot be mitigated

The soundness issue is whether the Regulation 19 transport evidence assesses HOM 2.16 together with committed development and other allocations affecting the A6 corridor, A555 approaches, local junctions and surrounding residential routes. The assessment should use realistic trip-generation and distribution assumptions, test network and junction performance over the plan period, and identify mitigation that is costed, funded, programmed and secured through policy requirements and occupation triggers. It should also demonstrate that walking, cycling and public-transport measures would provide a genuine alternative to private-car travel rather than relying on uncommitted measures or assumed behavioural change. Without that evidence, the Council has not shown that the allocation's cumulative transport effects can be mitigated or that HOM 2.16 is effective.

The relevant national-policy test requires significant development to be located where sustainable transport can provide a genuine choice of travel modes, applying the version of the National Planning Policy Framework identified in the September 2026 Regulation 19 evidence.

The applicable National Planning Policy Framework states: "Significant development should be focused on locations which are or can be made sustainable... offering a genuine choice of transport modes."

High Lane cannot meet this requirement:

- A6 congestion is already severe
- No rail station
- Bus services are limited
- No funded mitigation is identified in the SLP

The September 2026 Stockport Local Plan Traffic Modelling Report assesses the strategic highway effects of the Regulation 19 proposals to 2042 and should be read with the Regulation 18 modelling. For HOM 2.16, the Council should identify the modelled flows affecting the A6, A555 approaches and relevant local junctions, the assumptions attributable to this allocation and other planned growth, and the mitigation included in each scenario. Unless those results and assumptions demonstrate that the network effects can be acceptably mitigated, the allocation has not been shown to be effective.

The assessment of HOM 2.16 should not be confined to the allocation in isolation. It should include committed development and other Local Plan allocations whose traffic would use the A6, A555 approaches, local junctions and surrounding residential routes. The Council should publish the development assumptions, assessment years, model validation information, junction results and mitigation scenarios used for that cumulative test. Without this information, it is not possible to determine whether the strategy's transport effects have been assessed consistently or whether the proposed mitigation is sufficient.

The Council should provide a site-specific delivery trajectory for HOM 2.16, including lead-in time, annual completions, build-out assumptions, market absorption, dependencies and contingency for delay. The trajectory must be reconciled with the timing of transport and infrastructure works and with the developable area remaining after mining, flood, landscape, ecological and drainage constraints. If a realistic trajectory cannot be demonstrated, the assumed contribution from HOM 2.16 should be reduced and replacement supply identified.

The viability evidence should test realistic remediation, drainage, transport, utilities, affordable-housing and community-infrastructure costs for HOM 2.16, together with phasing and financing assumptions. It should demonstrate that the policy requirements and mitigation relied upon for soundness can be delivered without later dilution.

Consequence for the test: Without a realistic trajectory, funded mitigation and site-specific viability evidence, the Council cannot rely on HOM 2.16 to deliver the stated contribution within the plan period.

4.2 Essential services cannot support the development

HLVNF's Reg 18 response:

"The scale of development will place unsustainable pressure on local medical, educational, and utility services... Water and effluent infrastructure are inadequate."

The September 2026 Infrastructure Delivery Plan should demonstrate whether the transport, education, health, water, wastewater, drainage and utility infrastructure required for HOM 2.16 has been identified through engagement with the responsible providers and aligned with the housing trajectory. It should establish the available capacity, delivery responsibilities, costs, funding, dependencies and timescales. Any material omission or mismatch would indicate that the allocation is not deliverable as proposed.

- GP expansion
- Dental capacity
- School places
- Water supply resilience
- Wastewater treatment upgrades

For each required item of health, education, water, wastewater, drainage and utility infrastructure, the Regulation 19 evidence should identify existing capacity, the additional demand generated by HOM 2.16, the intervention required, the delivery body, cost, funding mechanism, land requirement, programme and occupation trigger. Reliance on later planning conditions or developer contributions is not sufficient unless the Council demonstrates that the necessary works are feasible, viable and capable of delivery at the stage when they are needed.

Consequence for the test: Deferring essential infrastructure to later applications does not demonstrate that the allocation is deliverable, particularly where the timing or feasibility of provider upgrades has not been established.

4.3 Site risks: mining and flooding

HLVNF's Reg 18 response:

"The allocation... appears to have underestimated the risks from both mining hazards and site flooding."

HLVNF's Regulation 18 response cites the following evidence in support of its mining and flood-risk concerns:

- **Coal Authority mapping** showing 67 mine entries

- **SFRA2** identifying flood zones 2 and 3
- **EA requirement** for a “full drainage strategy”

Mapped mining and flood constraints are not, by themselves, proof that the site cannot be developed. However, where the location and influence of mining features, the extent of land affected by flood risk, the required remediation and drainage measures, and the associated abnormal costs remain unresolved, the Council cannot reliably establish developable area, capacity, viability, phasing or delivery rates. Those uncertainties therefore bear directly on whether 1,000 homes can be allocated soundly at plan-making stage and cannot all be deferred to detailed design or a later planning application.

Required change: Establish a realistic capacity and trajectory; complete cumulative transport and provider assessments; identify costed, funded and programmed mitigation; test abnormal costs and policy requirements through site-specific viability evidence; and impose binding phasing, monitoring, review and occupation controls. If those measures cannot be demonstrated, reduce or delete the allocation.

5. Soundness Test D – Not Consistent with National Policy

Applicable test: The Plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework and other relevant national policy.

Relevant Regulation 19 policies: Strategic Policies 1 and 3; HOM 1, HOM 2a and HOM 2b/HOM 2.16; ENV 1–5, ENV 7–10, ENV 13a, ENV 13c, ENV 14 and ENV 15; CR 1; and HOM 8.

HLVNF’s case: The allocation has not been shown to satisfy the national-policy requirements relevant to justified Green Belt alteration, sustainable transport, rural community vitality, flood risk, land stability, biodiversity, habitats, landscape and environmental protection. The issue is cumulative: the proposed scale depends upon mitigation and safeguards that are not yet shown to be effective, funded or deliverable.

5.1 Fails NPPF Green Belt tests

The allocation should be assessed against the version of the National Planning Policy Framework identified by the September 2026 Regulation 19 Local Plan and its supporting topic papers. References to rural housing, Green Belt release and sustainable transport should use the paragraph numbers and wording applicable to that version, with each policy test linked to the corresponding Regulation 19 evidence for HOM 2.16.

- Exceptional circumstances
- Exhaustion of alternatives
- Sustainable development patterns

The September 2026 Regulation 19 housing and Green Belt evidence explains that the identified housing shortfall required the Council to consider whether land in the Green Belt should be released.

“The baseline figure... leaves a shortfall... Consequently, the council has been required to consider development of land in the Green Belt.”

But the SLP does **not** demonstrate:

Consequence for the test: Without a transparent alternatives assessment, exceptional-circumstances case and reasoned treatment of Green Belt harm, the allocation has not been shown to be consistent with national Green Belt policy.

- Why High Lane is preferable to urban grey belt
- Why brownfield was not fully assessed
- Why rural settlement expansion is sustainable

5.2 Fails NPPF rural protection policies

The applicable national-policy test requires rural housing to enhance or maintain the vitality of rural communities.

The Regulation 19 evidence does not demonstrate that growth of about 40 per cent would maintain or enhance community vitality, given the identified limits on services, public transport, highway capacity and access to employment.

5.3 Fails NPPF sustainable transport policies

The applicable national-policy test requires significant development to be located where sustainable transport can provide a genuine choice of travel modes.

The Regulation 19 evidence does not demonstrate that High Lane is, or can be made, a sustainable location offering a genuine choice of travel modes, because no funded and deliverable mitigation package has been identified.

Consequence for the test: Without funded and deliverable measures providing a genuine choice of travel modes, HOM 2.16 has not been shown to accord with national policy on sustainable locations and transport.

5.4 Fails NPPF environmental protection policies

The September 2026 Habitats Regulations Assessment should identify the European sites potentially affected by the Local Plan, the impact pathways relevant to HOM 2.16—including recreation, water resources, nutrient effects where applicable, and air quality—the screening and appropriate-assessment conclusions, and the mitigation or policy safeguards relied upon. The evidence should record engagement with Natural England and relevant infrastructure providers. Any site-specific omission or unresolved uncertainty bears directly on whether the allocation is consistent with national environmental policy and may require new evidence rather than a drafting-only modification.

The Habitats Regulations Assessment identifies or should assess, as applicable to the relevant impact pathways:

- South Pennine Moors SAC
- Peak District Moors SPA
- Rochdale Canal SAC
- Rostherne Mere Ramsar

- Manchester Mosses SAC

HLVNF's Reg 18 response notes:

"The habitat assessment is insufficient... HL7 is potential scrubland with greater biodiversity not assessed."

The Regulation 19 evidence does not demonstrate that the effects of HOM 2.16 on relevant protected sites, habitats and biodiversity can be avoided or adequately mitigated; the allocation has therefore not been shown to be consistent with national environmental policy.

Required change: Complete the Green Belt, transport, flood, ground-stability, ecological, landscape and habitats evidence; secure effective mitigation through the policy; and reduce or delete HOM 2.16 if compliance cannot be demonstrated. Any evidential defect requiring new SA/SEA or HRA work should be addressed through fresh assessment and consultation, not explanatory drafting alone.

6. Requested Outcome – Changes to the SLP

HLVNF requests deletion of HOM 2.16 because the Council has not demonstrated that a 1,000-home allocation at High Lane is justified or deliverable. If the Inspector is not satisfied that deletion is necessary, HLVNF requests that the allocation be substantially reduced to an evidence-led capacity following a fresh, comparable assessment of reasonable alternatives, including the option of 100 homes as per the HLVNF survey for the SLP Reg.18 in 2025. Any retained allocation should define its developable area, capacity and delivery trajectory and include enforceable requirements for comprehensive master planning; cumulative transport assessment; funded transport, education, health, water, wastewater, utility and drainage measures; mining, flood, ecological and landscape mitigation; provider commitments; viability testing; delivery responsibilities; phasing; monitoring; contingency; and occupation triggers. Where the necessary evidence is absent, the Council should undertake and consult on the new assessment rather than relying on explanatory wording.

- **To become positively prepared:** redistribute growth or reduce HOM 2.16 to a scale aligned with sustainable accessibility and committed infrastructure.
- **To become justified:** reassess reasonable alternatives on a common basis and provide a transparent parcel-level Green Belt and balancing assessment.
- **To become effective:** establish a realistic trajectory, site-specific viability, provider commitments, funded mitigation and binding delivery triggers.
- **To become consistent with national policy:** demonstrate compliance on Green Belt, sustainable transport, rural vitality, flood risk, land stability and environmental protection, supported by complete SA/SEA and HRA evidence where required.

Option A – Removed from the Local Plan

OR

Option B – Substantially reduced to an evidence-led capacity, with 100–250 homes tested as a reasonable alternative

AND

Reassessed against urban-adjacent grey belt alternatives

Additionally:

- Before submission, the Council should publish or clearly identify the Regulation 19 evidence relied upon for brownfield capacity, infrastructure delivery, Green Belt methodology, transport mitigation, flood risk, mining risk and environmental effects, and should modify HOM 2.16 where that evidence does not demonstrate a justified and deliverable allocation.
- Infrastructure capacity must be evidenced and funded.
- Green Belt methodology must be made transparent.
- Environmental and mining risks must be fully assessed.

7 Conclusion

For the reasons set out above, HLVNF requests that the Inspector find HOM 2.16 unsound. The allocation is not positively prepared because its scale and distribution are not aligned with demonstrated infrastructure and sustainable accessibility; not justified because reasonable alternatives and Green Belt harm have not been assessed through a transparent and comparable decision trail; not effective because the delivery trajectory, mitigation, provider commitments and viability are not secured; and not consistent with national policy because compliance on Green Belt, transport, rural vitality and environmental constraints has not been demonstrated. HLVNF therefore seeks deletion or, if deletion is not considered necessary, the evidence-led reduction and safeguards specified in section 6, and participation in the relevant examination hearing sessions.

Richard Jones

Chair HLVNF

Appendix 1. Sources and evidence relied upon

Issues raised in HLVNF's December 2025 Regulation 18 response

- Green Belt redesignation concerns
- Rural settlement impact
- Transport congestion
- Infrastructure capacity
- Mining and flooding risks
- Habitat and biodiversity concerns

From the September 2026 Regulation 19 Local Plan and supporting evidence

- September 2026 Regulation 19 Stockport Local Plan and Policies Map; Stockport Local Plan Regulation 18 Consultation Statement; and the adopted High Lane Village Neighbourhood Plan
- September 2026 Green Belt Topic Paper and underlying parcel assessments for HL7 and HL8
- September 2026 Habitats Regulations Assessment

- September 2026 Housing Topic Paper, supporting land-supply evidence and Integrated Sustainability Appraisal
- September 2026 Infrastructure Delivery Plan and Stockport Local Plan Traffic Modelling Report
- September 2026 Climate and Nature Topic Paper, Greater Manchester Level 1 Strategic Flood Risk Assessment, and Greater Manchester Level 2 Hybrid Strategic Flood Risk Assessment and appendices

This appendix distinguishes the September 2026 Regulation 19 source documents from HLVNF's earlier Regulation 18 material. Quotations and factual assertions should be read with the source identified in the relevant section; document title, date, section or paragraph, and page number are included where available.

Appendix B: Green Belt Assessment and HOM 2.16: Soundness Objection

Stockport Local Plan Regulation 19 Green Belt Topic Paper 2026

The Green Belt Assessment (GBA), including Appendix A, does not provide a proportionate, consistent or sufficiently analytical basis for releasing land from the Green Belt. Its general methodology relies too heavily on “grey belt” classification, while giving inadequate attention to openness, permanence, countryside encroachment, cumulative effects and reasonable alternatives. These weaknesses are particularly serious for HOM 2.16 at High Lane, a proposed allocation of 1,000 homes within the sensitive Hazel Grove–High Lane gap.

1.0 Positively Prepared

The assessment does not demonstrate that Green Belt release produces a sustainable pattern of development. For HOM 2.16, proximity to a bus stop and Middlewood Way is not a substitute for a full sustainability assessment. The evidence does not adequately address A6 congestion, limited public transport and active-travel choices, access to employment and services, infrastructure constraints, or the capacity of a rural village to absorb growth on this scale. Nor does it show that more sustainable urban-adjacent or lower-harm alternatives were exhausted. The allocation is therefore not positively prepared.

2.0 Justified

The GBA does not provide proportionate evidence or a robust comparison of reasonable alternatives. Grey belt status is treated as a shortcut to release, although it does not establish development suitability, assess openness or permanence, or displace Green Belt Purpose C. Appendix A's treatment of HOM 2.16 is narrative rather than analytical: it contains no quantified openness assessment, viewshed or landscape-sensitivity analysis, scale-based harm assessment, or credible appraisal of the long-term defensibility of Middlewood Way.

The cumulative assessment is especially weak. Although Appendix A identifies HOM 2.16 alongside HOM 2.18, HOM 2.39 and HOM 2.40, it does not model their combined effects on settlement separation, landscape character, openness, transport, ecology or High Lane's identity. It also acknowledges that development would significantly weaken the separation between Hazel Grove and High Lane, yet concludes that release would not fundamentally

undermine Green Belt purposes. That unresolved contradiction, together with the absence of a transparent alternatives assessment, means HOM 2.16 is not justified.

3.0 Effective

The allocation is not supported by a credible delivery strategy. The evidence does not establish how transport, schools, health services, water and wastewater capacity, or mine-entry remediation would be funded, phased and delivered. It also fails to assess cross-boundary effects on Cheshire East, including Poynton and Disley. Without committed mitigation, infrastructure phasing and effective joint working, the proposed scale of development cannot be regarded as deliverable; HOM 2.16 is therefore not effective.

4.0 Consistent With National Policy

The assessment does not demonstrate exceptional circumstances for selecting High Lane specifically, nor why 1,000 homes must be placed in this rural location rather than on more sustainable or less harmful alternatives. It fails to show that the revised Green Belt boundary would endure, that openness would be protected, or that further eastward release would be resisted. Development at HOM 2.16 would weaken the Hazel Grove–High Lane gap and extend built development into open countryside, conflicting with the objectives of preventing sprawl and safeguarding the countryside from encroachment. The allocation is therefore not consistent with national Green Belt policy.

5.0 Requested Outcome

For these reasons, the GBA is an inadequate basis for releasing HOM 2.16 and the allocation is unsound against all four soundness tests. The preferred remedy is to **remove HOM 2.16 from the Local Plan**. If it is not removed, it should be **substantially reduced, to 100 or less as per the HLVNF 2025 survey, and re-evaluated** through a transparent comparison with reasonable alternatives, supported by cumulative-impact modelling, quantitative openness and landscape assessment, a defensible-boundary and permanence review, cross-boundary assessment, and a funded, phased infrastructure strategy. Until that work is completed, the allocation should not proceed at its proposed scale.