

HLVNF SLP Regulation 19 portal responses – Objection

1. Question 1 Tell us about **your objection** (4,000 characters – 30 mins)

Why HOM 2.16 Fails the Four Soundness Tests (3,341 character)

HOM 2.16 should not proceed as drafted. The Council has not shown that 1,000 homes at High Lane—about a 40% increase in the village’s housing stock—is the most appropriate strategy or deliverable sustainably within the plan period. The key defects are unrealistic delivery assumptions; poor alignment with infrastructure capacity; uncosted and unsecured infrastructure; incomplete cumulative transport modelling; inadequate site-specific viability, alternatives and Green Belt evidence; and unresolved water and habitats constraints. These engage all four soundness tests and justify deleting or substantially reducing the allocation.

1. Not positively prepared. High Lane has no rail station, limited buses and an already congested A6. The Plan does not show how residents would reach jobs and services without greater car dependence, or how transport, health, education, water, wastewater, utilities and drainage would be delivered before or alongside occupation. Deferring these matters to applications does not establish a sustainable strategy.

Policy alignment: Strategic Policies 1 and 3; HOM 1, particularly 2(b)–(c) and 2(f); HOM 2a; HOM 2b/HOM 2.16; and COM 1–3 and COM 7.

2. Not justified. HOM 2.16 has not been transparently compared with brownfield, urban-capacity and better-served urban-adjacent alternatives using consistent criteria. For HL7 and HL8, the evidence does not clearly establish grey-belt status, exceptional circumstances or why 1,000 homes were selected. It accepts that development would narrow the High Lane–Hazel Grove gap and weaken separation, but does not show that benefits outweigh that harm. Without a traceable comparison and balancing exercise, the strategy is not justified.

Policy alignment: Strategic Policies 1 and 3; ENV 14; HOM 1; HOM 2a; HOM 2b/HOM 2.16; the Policies Map; Integrated Sustainability Appraisal; and Green Belt evidence.

3. Not effective. The evidence does not establish cumulative effects on the A6, A555 approaches, local junctions and residential routes. Nor is there a funded programme for transport and essential services, a site-specific viability appraisal, or a realistic trajectory identifying delivery bodies, costs, timescales, dependencies, contingencies and binding occupation triggers. These determine whether 1,000 homes can be delivered safely and on time. Without enforceable commitments, HOM 2.16 is an aspiration, not a deliverable allocation.

Policy alignment: Strategic Policy 3; HOM 1; HOM 2b/HOM 2.16; INF 9–10; COM 2–3 and COM 7; ENV 7–10; and CR 1.

4. Not consistent with national policy. Mining, flood, drainage, ecological and landscape constraints create material uncertainty over capacity, viability and delivery. The Plan does not demonstrate that High Lane is or can be made sustainable; that Green Belt release is necessary after assessing reasonable alternatives; or that rural vitality, settlement separation and

environmental assets will be protected. These national-policy requirements cannot all be deferred to applications. HOM 2.16 should be deleted or substantially reduced and reassessed.

Local Plan alignment: Strategic Policies 1 and 3; HOM 1; HOM 2a; HOM 2b/HOM 2.16; ENV 1–5, ENV 7–10, ENV 13a, ENV 13c and ENV 15; CR 1; and HOM 8, together with national requirements on sustainable locations, justified Green Belt release and rural vitality.

1. Question 2 Tell us **what needs to change** (4,000 characters – 30 mins) – (3,486 characters)

1. Infrastructure, delivery and viability. Remove HOM 2.16 or reduce it to an evidence-led scale unless the Council provides a costed, funded and deliverable infrastructure programme. For transport, education, health, water, wastewater, utilities and drainage, identify baseline capacity, required schemes, provider commitments, funding, land, delivery bodies, dependencies, programmes and enforceable occupation triggers. Test these requirements, together with remediation, mitigation, lead-in times, build-out rates and market absorption, in a site-specific viability appraisal. Prevent occupation beyond defined thresholds until works are operational, with review or stop mechanisms if delivery slips.

2. Spatial strategy and reasonable alternatives. Reassess HOM 2.16 against brownfield, urban-capacity, grey-belt and other reasonable alternatives using a transparent common baseline and consistent criteria, without assumptions favouring the preferred allocation. Publish the sites considered, realistic capacities and timescales, reasons for rejection or reduction, and the weight given to accessibility, infrastructure, viability and environmental constraints. The sustainability appraisal must explain how consultation responses and the adopted High Lane Village Neighbourhood Plan shaped the strategy.

3. Green Belt. For HL7 and HL8, provide parcel-level assessment of each Green Belt purpose, including settlement separation and the High Lane–Hazel Grove gap. Explain any grey-belt classification, apply sequential testing, demonstrate exceptional circumstances and undertake a reasoned balance of Green Belt harm against claimed benefits. Any release must establish a permanent defensible boundary and protect landscape buffers. If homes must be redistributed, prioritise suitably located low- or moderate-performing grey-belt parcels adjoining urban areas with adequate infrastructure and services.

4. Sustainability, effects and enforceability. Demonstrate through cumulative transport modelling that the A6, A555 approaches, junctions and nearby routes can accommodate HOM 2.16 with committed development and other allocations. Publish inputs, trip rates, distributions, assessment years, validation, junction results and mitigation scenarios. Secure funded public transport, safe walking and cycling, road-safety measures and monitoring; uncommitted bids must not count as mitigation. Mining, flood, drainage, ecology and landscape evidence must define constraints, abnormal costs, developable areas, mitigation, biodiversity net gain and long-term management. Water and wastewater providers must confirm capacity and programmed upgrades.

Required outcome. Any retained allocation must be site-specific and enforceable, with coordinated land assembly, defined developable areas, densities and design parameters, green and blue infrastructure, community facilities and binding phasing that reflects High Lane's rural

form and neighbourhood plan. If a sustainable and viable allocation cannot be demonstrated, delete HOM 2.16 and redistribute housing to better-served alternatives.

HLVNF's preferred option is 100 homes or fewer, supported by 80% of respondents to its 2025 Regulation 18 survey. Any development should avoid a crossroads on A6 being one side only to minimise transport congestions, and pollution impacts. Any defects requiring new SA/SEA, HRA, provider or technical evidence must be addressed through fresh assessment and consultation, not explanatory drafting.