

# **Protect Congleton – Civic Society Comments on the Cheshire East Local Plan**

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The following are primarily comments on the Congleton aspects of the Local Plan, unless stated otherwise or obvious from the context of the comments. If further information or clarification is required please email: [protectcongleton@gmail.com](mailto:protectcongleton@gmail.com).

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## **1. Summary and Overall Comments on the Local Plan**

The Local Plan is difficult to understand and it is not clear how and when the Link Road proposed for Congleton can be achieved or whether the road will in itself have a deleterious effect on the town. The number of houses proposed in ratio to the size of the town seems excessive and we are sorry that housing development is being decided for purposes of economic development rather than because it will enhance the town and satisfy current community needs. We express grave concern about the effects of the loss of such a large green area on the visual and economic aspects of the town and feel that there are no adequate safeguards to preserve those amenities such as fields, hedgerows and trees which are so highly valued by the community. It is our belief that the argument put forward in favour of the development is flawed and that some of the aspects of the town which are highly valued by the community are under-valued or ignored in this plan. The Development Strategy does not mention the development of viable brown field sites for Congleton and is a serious flaw as over 700 dwellings could potentially be delivered by brown field sites. We do, however, believe that development should be planned and not haphazard and we feel that the adoption of the plan, albeit with more safeguards for the green areas and some further clarification of the impacts, would be a good thing if it ensures that development of the Borough is decided by local people and not by developers or central government. However, many of the questions and issues raised in the following sections need to be satisfactorily answered before we are able to agree that the Local Plan brings a significant benefit to Congleton and its community.

## **2. Local Plan Documentation and Comment Submission**

- 2.1. The Local Plan consists of seven documents consisting of over 1,680 pages of material, as well as at least three supporting documents that need to be consulted to get a complete picture of what is being proposed (the supporting documents are the SHMA (Reference 8.4), SHLLA (Reference 8.3) and Transport Strategy (Reference 8.5)).
- 2.2. It is understood that this information needs to be produced but it is felt that some of the information could have been summarised in a more understandable and concise manner. The vastness of the material deters many people from reading what is there and hence commenting on the Local Plan.
- 2.3. Even though there are hundreds of pages of material when a reader tries to get to the nitty-gritty of what this means for their town then the detail required to make an effective assessment is usually missing.
- 2.4. How have the hard to reach community been catered for? Particularly if people do not have internet access have any measures been taken to ensure that they have easy access to the Local Plan?

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### **3. Housing and Population Projections**

- 3.1. We would like to express concern about the forecasts and the implications of these.

The Development Strategy Appendix C Section C 6 (Reference 8.1) states:

*The modelling estimated that the preferred option of providing for 27,000 homes between 2010 and 2030 or an average of 1,350 dwellings per annum would accommodate a population increase of 33,600 and an increase in the labour supply of 2,900 people over the Plan period.*

- 3.2. We understand that the methodology used in reaching this forecast and these figures, as explained in “Population Projections and Forecasts” is based on national and regional population statistics and forecasts, and on the information contained in the SHAA. We recognise and acknowledge that the data shows that CE has an ageing population, that both at national and local level there is a trend towards single living, and that there is a demand within the area for accommodation in reaction to these trends. We also note that the SHMA (Reference 8.4) demonstrates the demand within the area for significant provision of affordable accommodation. Furthermore, we acknowledge that in the current economic climate there is a need to create jobs, to stimulate the economy and to encourage sustainable communities. However, we entertain grave doubts that the model which has been adopted by Cheshire East is capable of addressing these issues.
- 3.3. We note that the figures given above, 33,600: 27,000: 2,900, could be expressed as 10 units of occupancy are required for every 12.4 units of population and this generates 1 unit of labour within the area. Taken logically, if this were to be reflected within the housing-building programme, this would require over 80% of the proposed new housing to consist of single occupancy units. This seems highly unlikely and therefore, this model lacks plausibility, credibility, achievability or sustainability. We also note that it was not the model preferred by respondents to consultation. (59% opted for a higher growth option, 16% for a lower growth option and 8% did not answer the question. As the Council chose to ignore the response, it is not clear what point there was in asking it.) In fact, by adopting this option, the Council appears to have fallen between two stools.
- 3.4. The SHMA (Reference 8.4), which we note is a document which is out of date and contains some mathematical errors, states that there is an identified need for 1,243 affordable homes per annum across Cheshire East, if this statistic is correct then 92% of the proposed new homes would need to be affordable. This statistic (1,243 affordable homes) is also quoted in the Development Strategy, Section 5.9 (Reference 8.1). This is far in excess of the 30% requirement proposed in SC4 of the Policy Principles (Reference 8.2). Indeed, it is hard to understand how such a disproportionate number of affordable housing units could ever be achieved without significant state intervention in the form of local authority housing projects or how it could satisfy the statement in Paragraph 4.35 of the Policy Principles (Reference 8.2) that “*government policy seeks to create sustainable communities that offer a wide range of housing types and tenures and are socially inclusive*”. It is our view that it is unlikely that developers would wish to deliver affordable housing in any higher rate than 30% and we note that 6 and 7 of SC4 provide substantial get-out clauses to allow them to avoid even this percentage of affordable housing. Given that it is likely that affordable housing would provide the mass of single occupancy units of dwelling it seems that there is a mismatch between the perceived need, as suggested by the figures in the SHMA (Reference 8.4) and the Local Plan and the actual conditions for delivery.

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- 3.5. We would suggest that there is a dislocation between the objectives of the Plan and the potential for delivery and suggest that this is because either the statistics or the methodology of interpretation is incorrect. It would appear that whilst the number of required housing units has been decided by the need for over 80% single occupancy units, the market forces and the housing policy will not allow this to be achieved. It seems likely, therefore, that extra housing will be supplied which will not satisfy the recognised need and thus will perpetuate the current imbalance and the problems arising from it.
- 3.6. With particular regard to the effects of these proposals for the town of Congleton we should like to make the following observations.
- 3.6.1 The proposals for Congleton require sacrifice of large areas of countryside and there is a substantial body of opposition and resentment within the community to this. Over the last year there has been very vocal opposition to several planning applications and Protect Congleton - Civic Society anticipates that there will be similar or greater opposition to the Plan.
- 3.6.2 The figures taken from the SHMA (Reference 8.4) show that Congleton currently has 11,356 homes. The proposal is that over the period of the plan 3500 additional homes should be built. Increasing Congleton's housing stock by over 30% in twenty years (actually 18 years at the date of this consultation) is ambitious by any standards and would seem unrealistic for town of Congleton's current size, infrastructure and needs.
- 3.6.3 The 80% single occupancy postulated by the Development Strategy (Reference 8.1), in other words an average of only 1.2 people per housing unit, is totally unrealistic and the type of dwellings that this suggests need to be built cannot be enforced by Cheshire East nor will it be carried out by developers.

#### **4. Link Road and Transport Aspects of the Local Plan**

- 4.1. It is understood that the Link Road is an essential part of the economic strategy of the plan but we note that it will require considerable land sacrifice through open countryside that is of special importance and value to the people of Congleton. It is important, therefore that the economic value of this proposed road should be realisable. There does not appear to be a feasibility study attached to this proposal and it is unclear whether the associated development would happen if the land or funding was unavailable. This area of uncertainty should be clarified. Nor is it clear where the two aspects, road and settlement development, are in relation to each other in terms of timescale. It is clear that there could be serious consequences for the town, in terms of unsustainable development in housing, economic development, and deleterious impact on the existing infrastructure if the road were not to be built, or even built later than much of the housing and business development.
- 4.2. We note that the southern end of the Link Road ceases at Sandbach Road Congleton. It is noted elsewhere in the supporting evidence for this plan, including in the population forecasts, the business plan and in the SHMA (Reference 8.4) for example, that the main connectivity of Congleton is with 2 areas, South Manchester and North Staffordshire. Whilst it is understood that the southern link is to be to the M6 via Sandbach this ignores one of the principle routes for traffic, and in particular for business traffic. We note that the route to South Staffordshire from Sandbach Road, Congleton, via the M6 and the A500 route is 7 miles and 5 minutes longer than the direct route along the A34. This hardly seems a sustainable option and it would appear more likely that traffic from, and to, Stoke and north Staffs would either continue through the town or would access the Link Road either through the Wall Hill route or through Padgbury Lane. Neither of these roads are designed for heavy traffic. Wall Hill is single track at one point with houses lining the road at this point. Padgbury Lane is residential and is a route to school. We consider the lack of a southern connection to the A34 is a serious flaw with this proposal.

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- 4.3. We note that although the Local Transport Plan acknowledges the historic problems within Congleton town created by narrow roads and traffic over-load, there is no plan to improve this for local traffic or to ensure that additional development to the north and west of the town will be able to access the town, except along the routes and through the “pinch points” that are already subject to unacceptable levels of congestion, pollution, noise and vibration. Although the plan claims to promote increased use of the town centre it is not clear how residents in the new areas will access this and we have concerns that the Link Road will encourage residents to look outwards, especially to Manchester and the wealthier areas to the north of the town for shopping, for work opportunities and for entertainment.
- 4.4. Further detail is required on the Link Road in order that Congleton residents are able to understand whether this is a realistic and valuable proposition for the town, such things as:
- 4.4.1 The route for the Link Road needs to be confirmed. There are two northern routes in the plan and as for Point 4.2 the Link Road should be connecting the south A34.
- 4.4.2 We understand that the Link Road will be single lane in each direction; this should be confirmed in the Development Strategy (Reference 8.1).
- 4.4.3 The Link Road will generate lots of air pollution and noise pollution as well as cutting a swathe through open countryside. Traffic noise is expected to be a major problem especially as the Link Road is so close to the development sites and in one instance may run through the middle of a development site. What measures will be put into place to combat the air pollution and noise pollution? How will the Link Road be built such that it is sympathetic to the open countryside in which it lies (e.g. what mechanisms will be used to visually camouflage the road)?
- 4.4.4 What is the realistic time scale for starting and completing the development of the Link Road?
- 4.4.5 How will the development sites be connected to the Link Road? There could be in the order of ten connections to the Link Road, one for each Strategic Site plus the road crosses or joins six other roads, this could give rise to a very “stop-start” piece of road, especially at peak times. Has Cheshire East conducted a road survey/analysis for the traffic they anticipate will use the Link Road and is the Council confident that the stop-start nature of this road, especially at peak times, will satisfactorily cater for the required traffic flows?
- 4.4.6 There are residential as well as business sites and the close proximity of the residential dwellings to such a road is not desirable. What road safety measures will be put in place to ensure the safety of the near-by residents?
- 4.4.7 How will cyclists and pedestrians be catered for?
- 4.4.8 Has a study been carried out for the proposed route of the Link Road to ensure that areas of special interest and/or value will not be destroyed?
- 4.5. Link Road Funding Strategy. There is very little information in the Development Strategy on the proposed Congleton Link Road and nothing is provided on the funding of the Link Road. Without such information it is not possible to review the proposals for the Link Road and assess its benefits or otherwise on Congleton. Responses to the following questions and observations, as a minimum, need to be provided in order that the Link Road can be properly assessed:
- 4.5.1 What is the projected cost of the Link Road and how will the Link Road be funded? Does Cheshire East have the funds to build the Link Road and, if not, when do they expect to have the funds in place?

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- 4.5.2 It is understood that developers will need to contribute to the funding of the Link Road. On the surface developer's contributing to the Link Road appears a good funding source. However, the reality is that developers will not let any additional development costs impact their profit so the Link Road funding costs will be passed onto the house purchaser. This means that, effectively, a house purchase tax will be introduced for some/all new house builds in Congleton.
- 4.5.3 One of the main objectives for building the Link Road, we are informed, is to help stimulate new business. Will existing businesses, including landlords of empty business units, on the Business Parks be expected to contribute to the Link Road Funding? If so, what size of contribution will they be expected to make and will how will the Council enforce this?
- 4.5.4 Will all new businesses on the Strategic Sites contribute to the Link Road funding including all expansions of existing businesses (we assume that the funds will come from the developer of the business premises, who will need to pass on costs to the business/landlord)? If so, what size of contribution will they be expected to make?
- 4.5.5 Following on from the two points above, why should the house builds fund the Link Road? Should this not be predominately business funded? If there has to be funding from the house building this should be kept to the absolute minimum – is this proposed?
- 4.5.6 Will it only be dwellings (houses and business premises) on the Strategic Sites that will help fund the road (i.e. 600 houses are to be built on other sites as well as there being 552 already committed developments)?
- 4.5.7 Will Cheshire East have a say in how the Link Road funding required from developers will be passed onto the house purchase prices? One of the concerns is that the price of affordable homes will be increased even further by these requirements. In essence how will the funding will be allocated amongst the various types of property? For example: Will it be a flat rate per property (obviously unfair on the least expensive dwellings)? Will it be a percentage of the property price? Will it be some form of tiered rate (perhaps linked to the Council Band of the property)? Or will it be something else? We do not believe it is sufficient for the Council to respond that this will be left to the developers, the Council needs to be concerned with how this funding will impact the housing market. In addition 150 dwellings are to be built by 2015 on one of the Strategic Sites so the Council needs to have the funding policy in place now.
- 4.5.8 When will the Link Road funding contributions start and for how long will they be in place? Many of the strategic sites have capacity to build further dwellings after 2030 so it is important to know when this funding contribution will cease.
- 4.5.9 Will all other types of development be required to contribute to the Link Road (e.g. schools, doctors, nurseries etc.)?
- 4.5.10 There has been mention of a cost of £10,000 per house for the Link Road funding. This not an insignificant amount and, as mentioned above, the developer will need to pass this amount (or as much as possible) onto the purchaser. This would imply that the funding will increase the cost of the new housing proposed for Congleton. Taken to its extreme this could cause property prices in all/most areas of Congleton to increase. Although this impacts all residents it would seem to especially impact the lower income residents as it will make it even more difficult for such people to purchase a house. What measures/schemes will the Council put into place to alleviate this?

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- 4.5.11 Has the Council taken into account the “artificial” raising of property prices that this funding scheme could have on Congleton, and what do they see as the impact? For example: How will it impact the migration of residents in and out of the area? Has this been taken into consideration during the analysis of the housing and population figures? What is the impact on business costs?
- 4.5.12 How will the funding work in terms of ensuring the Link Road is constructed? We do not have any details on the contribution value per dwelling or how it will be applied or when it will start and on what houses/businesses it will be levied and this makes it impossible to understand what funds will be raised and how/when the funds will be used. For example, let’s say there is an “average” £10,000 per house and only houses on the Strategic Sites incur the cost then the maximum that can be raised by 2030 is 2,200 x £10,000, circa £22m. Then there will also be whatever the contribution there is from other dwellings. When the phasing of house builds is taken into account this implies £1.5M raised by 2015, another £6m by 2020, another £6m by 2025 and another £8.5m by 2030. This does not seem a lot of money to build a Link Road and would also imply it will be a long phasing period for the Link Road, undermining the capacity to generate new business/jobs. Perhaps a loan will be taken out to covers costs, so it would be beneficial to understand how this will work in the phasing and construction of the Link Road
- 4.5.13 Will this funding impact in any way the Council Tax Bands of the dwellings?
- 4.6. We note that although railway improvement is being put in place elsewhere, the issue of accessibility of rail transport to and from Congleton outside peak periods has not been addressed. We think that this is a failing in the plan.
- 4.7. It should also be noted that residents of the new sites will need to travel “through” Congleton Town centre in order to access the railway station, possibly resulting in further traffic at peak times on Congleton’s already congested local road infrastructure.
- 4.8. It is understood that Back Lane will be widened to cater for the traffic to/from Radnor Park in the period before the Link Road is available.
- 4.8.1 Will traffic heading for the north or west (e.g. Macclesfield and Manchester) still use that part of Back Lane that leads to the A54 by the existing Waggon and Horses public house?
- 4.8.2 It is assumed that the extension of Back Lane is for the narrow part of the road that leads to Chelford Road at a hazardous junction close to the brow of a hill where Chelford Road is also narrow. A right-turn route would only take traffic further into the countryside.
- 4.8.3 It is assumed that the traffic will use a left-turn through a residential area to join the A54 (Holmes Chapel Road). This is a notoriously dangerous staggered junction with Sandy Lane (on the opposite side but offset from Chelford Road) where the A54 traffic is in a 50mph zone and there is a sharp bend in the road.
- 4.8.4 Traffic wishing to head in the Sandbach direction is likely to uses Sandy Lane, which will then join the A534 (Sandbach Road) at another dangerous junction. It is not clear where Cheshire East expect traffic heading for North Staffordshire to head, possible by turning back into West Heath along the A54 and then using Box Lane (past a school) and then Padgbury Lane to Join the A34.
- 4.8.5 It is not all clear why such a route is being proposed for the traffic from Radnor Park and how this will be beneficial to the Radnor Park traffic. It certainly will not be beneficial to the existing residents of the proposed route.

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## 5. Strategic Sites and Other Development Areas

There are four strategic sites proposed in the Local Plan all situated to the North of the town along the route of the proposed Link Road. In addition to the sites there are other areas of Congleton that will be developed (and have been developed in the plan period, 2010 to 2030). The table below summarises the information presented in the Local Plan. The first entries cover the Strategic Sites listed from East to West as in the Local Plan. The other three entries cover: House builds already complete, “Commitments” it is assumed that these are areas where planning permission has already been granted and “Other Site Allocations” presumably any one of the areas identified in the SHLAA (Reference 8.3) for Congleton, where up to 600 houses will be built.

| Sites<br>30 houses per hectare      | Site<br>Capacity | Houses<br>in Plan<br>Period | Phasing for House Builds |            |            |            | Employment<br>Land (ha) |
|-------------------------------------|------------------|-----------------------------|--------------------------|------------|------------|------------|-------------------------|
|                                     |                  |                             | 2010 - 15                | 2015 - 20  | 2020 - 25  | 2025 - 30  |                         |
| Back Lane and Radnor Park           | 1,000            | 500                         | 0                        | 0          | 150        | 350        | 10                      |
| Congleton Business Park Extension   | 900              | 450                         | 0                        | 50         | 150        | 250        | 10                      |
| Giantswood Lane - Manchester Road   | 850              | 700                         | 0                        | 150        | 300        | 250        | 0                       |
| Manchester Road - Macclesfield Road | 550              | 550                         | 150                      | 400        | 0          | 0          | 0                       |
| <b>Strategic Sites Totals</b>       | <b>3,300</b>     | <b>2,200</b>                | <b>150</b>               | <b>600</b> | <b>600</b> | <b>850</b> | <b>20</b>               |
| Completions 2010-12                 | n/a              | 148                         | n/a                      | n/a        | n/a        | n/a        | 0                       |
| Commitments                         | n/a              | 552                         | unknown                  | unknown    | unknown    | unknown    | 0                       |
| Other Site Allocations              | n/a              | 600                         | unknown                  | unknown    | unknown    | unknown    | 0                       |
| <b>Totals</b>                       |                  | <b>3,500</b>                | <b>150</b>               | <b>600</b> | <b>600</b> | <b>850</b> | <b>20</b>               |

Each of the four Strategic Sites will have: Small Retail Unit (200 to 300 square meters); Pub, Take Away and Restaurant; Sports/Leisure Facility; Community facility and place of worship. In addition there will be a primary school on all sites apart from the Manchester Road to Macclesfield Road site (although no secondary schools are envisaged). The existing playing fields near to Back Lane are to be retained.

- 5.1. Congleton has been allocated a disproportionately large number of house builds, almost the same as Macclesfield which is a town with over twice the population. It is also noted that towns such as Wilmslow, Knutsford and Poynton have exceedingly low house builds.
- 5.2. There is no phasing of the house builds for the “Other Site Allocations”, this phasing should be provided so that the house building for the plan period can be fully understood.
- 5.3. It is acknowledged that there is a need for affordable homes. The current planning policy is that a minimum of 30% affordable homes needs to be built on any new, and significant, development. This minimum of 30% is unlikely to be sufficient for the projected housing and population needs. Developers are very unlikely to increase the 30% affordable homes as there is a greater profit in the building of 3, 4 and 5 bedroom houses. What measures will be put in place to ensure the requisite number of affordable houses are built and built at the required times? If policies are not changed then the planning officers will, as usual, only recommend what is required, i.e. the 30% target.



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- 5.4. Following on from the comment above there is no indication of the types of housing that will be built on each of sites. Without such basic definition how will Cheshire East understand what needs to be built where and enforce these needs, and how is the community to be expected to sensibly comment on the plan?
- 5.5. As a minimum 150 new homes will be built on the Manchester Road - Macclesfield Road site by 2015 and there is no indication that that at least one new primary school will be built on one of the other sites in the same time scale. Where will the children from these new homes attend school?
- 5.6. There is no consideration for the schools (primary and secondary) for the 600 dwellings referred to in the “Other Site Allocations” and must be addressed as the schools in Congleton are already oversubscribed. As these dwellings are not on the Strategic sites it is not acceptable that the resident’s children will use the new primary schools.
- 5.7. Although there are three new primary schools proposed for the sites no further Secondary Schools are proposed for Congleton, nor are any expansions to the existing Secondary Schools proposed (although for this number of children expansion of the existing Secondary Schools is probably not viable). The omission of further secondary education facilities is a flaw in the Local Plan.
- 5.8. There is no requirement for nursery provision in the plan.
- 5.9. What facilities will be put in place for the younger community so that they see the town as a viable and realistic option?
- 5.10. The Local Plan acknowledges that there is an aging population yet there is no mention of the provision of homes/care for the elderly. There needs to be a commitment in the Local Plan that the required elderly care facilities will be built and this will be enforced.
- 5.11. Fracking (extraction of Shale Gas) is being extensively backed by the Government and it is known that there is highly likely to be a major Shale Gas seam running beneath East Cheshire, and beneath Congleton. There is still lots of uncertainty around fracking, e.g. possibility of pollution, earth tremors, impacts on building insurance, impact on the landscape, fleets of lorries to move equipment, raw materials and the gas (at least in the short-term). Has the likely impacts of fracking in the Congleton area been considered in the choosing of the new sites and what measures will be put into place to ensure minimum (preferably zero) impact on the local communities on these new sites?
- 5.12. Congleton has very few doctors and other healthcare facilities and what facilities are available are located in or near to the town centre. There is no commitment in the Local Plan to the development of facilities for doctors and chemists in the site descriptions. This is a flaw in the Local Plan.
- 5.13. Similarly, the projected large increase in the population of Congleton and also of nearby Macclesfield and Sandbach requires an increase in the nearby hospital infrastructure. There is no commitment in the Local Plan to the development of hospital facilities and this is a flaw in the Local Plan.
- 5.14. For the Strategic Sites what routes will the local traffic be expected to take into or across the town? Such traffic should be expected for such things as: the railway station, library, doctors, dentists, town centre shopping, town information centre etc. We now have whole new developments that can be expected to use the existing poor and congested road infrastructure and limited town centre parking facilities.

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5.15. Back Lane and Radnor Park Site:

5.15.1 Radnor Park should not have been developed in its current position on the edge of a large residential estate with inadequate road infrastructure, i.e. use of the residential roads for access. Residents as far away as Black Firs Lane complain of the noise generated from the site. So to compound this noise pollution and traffic pollution by increasing the size of the business area by 10 hectares seems unjustifiable to existing residents as well as new residents. Until the Link Road is constructed the increased business traffic will need to use the inadequate local roads.

5.15.2 This is a very large site that will double the size of the existing West Heath housing estate. Just to increase the sprawl of houses and merge the existing and new developments cannot be a good thing for the community. The new development should have an effective barrier (buffer zone) from the existing housing estate. Furthermore, the road connections between the sites should be kept to a minimum to discourage a “rat-run” along Back Lane or other routes for residents (and others) who need to travel, for example, to and from the town centre, to schools or other amenities.

5.15.3 As mentioned at Paragraph 7.4, this site needs to be reduced on its western edge so that the development is not merged with Somerford. This reduction of the site will also avoid the RSPB owned land parallel to Black Firs Lane being subsumed into the new site. Also, there is a nature reserve on the opposite side of Black Firs Lane so the site reduction would ensure that the new site is much further away from this reserve.

5.16. There is no mention of the brown field sites in the Development Strategy (Reference 8.1). It is understood that the Congleton brown field sites could deliver up to 780 houses. There should be a commitment in the Local Plan that, where viable, brown field sites will always be used for housing development in preference to other sites for the 600 houses earmarked to the “Other Site Allocations”.

5.17. It is not clear where the funds to build all necessary infrastructure and other facilities associated with the strategic sites will come from. Developers will need to contribute certain amounts but the scale of the developments seems to suggest that the developers would not fund all requirements. What is lacking from the Local Plan is a financial analysis for each of the sites (and the Link Road) to identify indicative costs broken down into the various categories, e.g. land, dwellings, retail, employment units, roads, cycle paths, schools, community facilities etc. The analysis should then show where the money for each of the areas is expected to come from.

5.18. Has Cheshire East taken into consideration what the new high speed rail network means for Congleton? There is a campaign, supported by Cheshire East, to create a HS2 stopping point at Crewe and this would make the West Midlands and London even more accessible, especially for employment in major cities, which would seem to imply less local employment.

5.19. How much communal green space will be allocated within each of the sites and how will this be enforced during development?

5.20. The development of the four new sites would appear to split the town into two distinct areas. It is not at all clear how the sites will be good for the town centre. Retail outlets already exist on Barn Road and each of the new sites will have a small retail site. This appears good for the new sites but would seem to discourage residents from shopping in the town centre, and may even discourage existing residents who now have other facilities nearer their doorstep.

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- 5.21. The Development Strategy (Reference 8.1) C.39, C.40 and C.41 discusses an Infrastructure Baseline Report, Local Infrastructure Plan and Viability Report. Do these reports exist in some form now and are we able to view copies? Precisely how will a Viability Study be undertaken and who will be involved (for example, what criteria will be used to assess the viability of the Local Plan).
- 5.22. There are areas that are known to present a flood risk (i.e. Dane Valley). What measures and funding will Cheshire East put in place to ensure that flooding will not occur and residents are able to insure their properties at reasonable costs?
- 5.23. What measures will be in place to ensure that only suitable businesses will be attracted to the employment land so that they do not have a detrimental impact on the local residential communities? Once business units are developed landlords will be very keen to let-out units as quickly as possible with little thought to the local communities. Will Cheshire East also ensure that the deliveries to/from the new businesses are ONLY via the new Link Road so that the local infrastructure is not overburdened?

## **6. Business Expansion**

- 6.1. It is understood that one of the main objectives of the proposed Link Road is the ability to expand business and/or generate new business. A road in itself will not generate business. Congleton already has many business units vacant on the Radnor Park Site. What businesses do Cheshire East expect to be attracted to Congleton as a result of the Link Road? Has Cheshire East carried out a feasibility/viability study for what businesses may be attracted?
- 6.2. The Employment Land is located in residential areas so businesses that create large amounts of noise, require many deliveries, generate air pollution, require unsocial working and/or delivery times should not be allowed. This will limit the types of business that can be attracted to the business parks. Has this been taken into account?
- 6.3. Why does Congleton need two Business Parks? Has Cheshire East considered relocating one of the business parks, e.g. Radnor Park, to the other site to make one Business Park? This could also mean that the one site is designated a business only site so there is no mix of residential business dwelling, removing consequential problems of a mixed site.
- 6.4. Macclesfield and Crewe will be more accessible as a result of the Link Road and new businesses could be attracted to these towns. Has this been taken into account by Cheshire East?
- 6.5. We note that the Local Plan ignores the fact that two of the main business activities of the area are agriculture and tourism. We are particularly concerned that the land to be taken up for a road and housing in Congleton is very good agricultural land and that some of the land-owners have not been consulted and appear to be reluctant. It was noted that at a recent public meeting two farmers expressed concern that their farms could be rendered unviable by unwelcome land acquisition.
- 6.6. One of the criteria for sustainability of the businesses is to employ as many of the local community as possible. This should start as early as possible in a person's life. How will Cheshire East encourage local young people (e.g. school leavers) to choose to work local so that they see the town as a viable and realistic employer.
- 6.7. Similarly, how has Cheshire East considered the needs of the older work force in its proposals to generate further employment?
- 6.8. How many new jobs in Congleton does Cheshire East expect the development and Link Road to generate? The overall figures for Cheshire East are 2,900 (See Paragraph 3.1) whereas the Congleton Town Council has an outrageously high figure of 3,500 new jobs for just Congleton, implying almost 200 new jobs per year during the 18 years remaining of the plan period.

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- 6.9. We note that the plan ignores the fact that two of the main business activities of the area are agriculture and tourism. We are particularly concerned that the land to be taken up for road and housing in Congleton is very good agricultural land and that some of the landowners have not been consulted and appear to be reluctant. It was noted that at a recent public meeting two farmers expressed concern that their farms could be rendered unviable by unwelcome land acquisition.

## **7. Countryside**

- 7.1. There is mention of preserving areas of special interest that could be destroyed by the Strategic Sites, and Link Road. However, there is no mention of how such areas will be preserved and there needs to be an acceptance of all those areas that must be preserved by providing some form of protected status.
- 7.1.1 Open Countryside: The proposed line of the link road cuts through open countryside to the north of Congleton of considerable landscape value. The area is characterized by ancient enclosures and fields which owe their existence to parliamentary enclosure in the late eighteenth and early nineteenth centuries. With a mix of pasture, hedge lines of mature trees, and scattered stands of what appear to be copse, it is what is known as bocage. This distinctive pattern of land use is associated with areas, like eastern Cheshire, that have always had scattered un-nucleated settlement and a pastoral economy. Although locally much still survives, nationally bocage has largely succumbed to the demands of modern industrial agriculture. The proposed development to the south of the line of the link road will deface yet more and destroy a large part of the historic landscape setting of Congleton. As such, the proposed development will have a considerable effect on the character of Congleton. We need to consider the need for such large development sites, the Link Road and the value it actually brings to Congleton against the irretrievable destruction of our heritage. And the damage to the tourist and farming industries.
- 7.1.2 Dane Valley: The river cuts a deep wooded path through the town, forming the primary green corridor of Congleton. Industrial development has already had a considerable impact to both north and east. Further building will only devalue an amenity. The proposed development threatens to perpetuate the blindness to an inherent part of Congleton's character. The river should be preserved as a central feature and sensitive planning could mitigate the impact on the landscape around this area. We note that a corridor along the river Dane is subject to some protection and believe that any development in the areas identified in the local plan along this route should be well back from the river banks and should be adequately screened from view from the river side.
- 7.1.3 Giantswood Lane: Giantswood Lane is of considerable landscape importance. The boundary between town and countryside is well defined here and the course of the lane thus frames the rural setting of Congleton in a way that is rarely paralleled. There are few towns in which the same can be said. The Link Road and the two sites either side of Giantswood Lane will destroy the impression.
- 7.1.4 Woods and Hedgerows: There are a number of hedgerows and small copses within the development sites and on the route of the Link Road. There needs to be a commitment in the Local Plan to preserve such old areas of the landscape.

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- 7.2. As mentioned at Point 7.1, above, areas of special interest/value need to be preserved. Associated with this need is the necessity to have effective buffer zones throughout the sites. These buffer zones should be sympathetically designed such that the sites do not appear as “large urban sprawls”. These buffer zones need to be considered for such things as: protecting areas of interest/value (see Point 7.1, above), separating the new development from the existing developments (especially vital to the Back Lane Radnor Park site due to the already large area covered by the West Heath estate), separating the Employment Land from the residential areas, separating the retail and other amenities from the residential areas.
- 7.3. Will Cheshire East be carrying out any habitat surveys to ascertain the what will be impacted by the development sites and Link Road and will Cheshire East safeguard the interests of the survey findings? It is realised that developers should carry out the necessary surveys but, with respect, their interests are purely financial.
- 7.4. It is a source of concern that the development allocation for Congleton is so large in relation to the size and area of the town that development will spill over into the surrounding rural parishes. This is undoubtedly the case with Eaton, Hulme Walfield and Somerford and may become the case with Astbury and Smallwood. It is a characteristic of market towns that they have a clearly defined rural hinterland and this appears to be threatened by the Local Plan. It is felt that provision of green gap as a buffer zone between the town and the adjacent villages would be beneficial in ensuring the defining characteristic of the town. A suggested reduction of the west perimeter of the Back Lane and Radnor Park site to provide a Green Gap for Somerford is provided in Appendix A.
- 7.5. It has always been a characteristic of the town that the approaches, along the main roads that feed into the town, have been delineated by fields and hedgerows dotted with outlying farms and occasionally with some minor ribbon development along the edges of the roads. During the time of the last local plan there has been significant encroachment on these areas, the developments at Astbury Marsh, Congleton Cattle Market site and along Canal Road being examples of this. The hamlets which originally were also satellites of the main town have now disappeared and part of the historic distinctiveness of the town has disappeared alongside them. Whilst this is primarily a matter of losing view and aspect, this has also had a significant impact on the roads which have a tendency to become bottlenecks as the centre of the town is neared. The main routes into and out of the town are now urban rather than semi-rural and there is a loss of amenity, in terms of air quality, noise and travel issues, for the townspeople. The changes have, therefore, produced a lot of housing but they have not necessarily been beneficial to the town in terms of visual aspect or preserving areas which have been useful for health and recreational purposes.
- 7.6. There have always been clear gaps between the town development and the satellite villages and some of these villages, particularly Astbury, are tourist showcases and very important to the agricultural and tourism economy of the area. Whilst Cheshire is often defined as “green and leafy” the proposed Plan does appear to attack this aspect of the area and propose significant encroachment and blurring of the boundaries. During the period of the last plan it was particularly noticeable that developments were defined as “infill” when in fact they were encroaching on historically separate areas and the distinctive aspect of the town which combined green spaces with buildings has been lost as a result. It is considered by members of our society that this kind of development is not in the best interests of the town.
- 7.7. We should like to propose that the following areas are removed from the SHLLA (Reference 8.3) and given some kind of protected status (these areas are also highlighted on a copy of Congleton’s SHLAA diagram, see Appendix B in Section 10.

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- 7.7.1 Sites 2829, 2406 and 2509. These border the Astbury Mere Country Park and development on these will spoil the scenic beauty of the site. The Country Park has reclaimed a worked-out sand quarry as a recreational facility for the town and there has been significant tree planting to enhance this. This would be lost if the area was built on and a valuable recreational facility would be spoilt. In a town that was previously semi-rural with a lot of green space this is one of the few remaining green areas. There are concerns about the access implications if this site were to be developed.
- 7.7.2 Site 3860. This land is part of the parish of Astbury and constitutes one of the green areas on the road side corridor. Development on this site would be very visible from the village and would spoil the scenic beauty of the area. The site is immediately adjacent to the Astbury Travellers site. This has been one of the most settled and successful of the provisions for Gypsies and Travellers in the region with a very good relationship to the neighbouring town area of Astbury Marsh and Astbury Village. Settlement on this site could well destroy the balance that has been achieved.
- 7.7.3 All land to the south of Fol Hollow and to the east of Fol Hollow towards Lambert's Lane including the sites 2321, 4016, 2370, 2322, 2812, 2819, 2397, 2547, 2862 and 4243. This land to the south of Fol Hollow comprises an old boundary with the town and covers the ancient route said to have been taken by the Priests from the mother church in Astbury into the burgeoning township of Congleton. The lane known as Fol Hollow is of historic significance as are Priestly Fields and Howey Hill. These have historically provided a recreational facility for the townspeople and they are considered to be of great value scenically. Lamberts Lane is a protected wildlife corridor that is regularly used by townspeople and development near this area would destroy the character of the lane and unnecessarily destroy wildlife. Again, it is feared that any development over these areas will destroy the scenic value of Astbury and provide urban sprawl into Astbury.
- 7.7.4 Sites 2782, 2364, 2804, 2542, 2541, 2543, 2544, 2798, 2799, 4178, 4719. These sites and the adjacent land cover a significant area of prime farming land and again they would encroach on the visual aspects of the town's perimeter. We can see no reason why they have been included in the SHLAA as land for development and believe that such development would effectively ruin the parishes of Smallwood and Somerford.
- 7.7.5 Sites 2752 and 2726. These sites should be removed so as to protect the rural identity of Brereton from over development and in an area that will not support sustainable development due, for example, to its remoteness from the required sustainable facilities.
- 7.7.6 Sites 334, 2549, 2550, 2548, 3892. These sites should be removed to protect the visual aspect of the Canal that is regular used by townspeople and tourists.
- 7.8. Whilst we understand that there are policies within the plan to protect the surrounding countryside it is clear from the fact that the above sites are included in the SHLAA that these sites could be under attack from development and that there is no clear understanding within Cheshire East of the value and importance of these areas to either the ecology or the human values of the existing settlement. As stated previously, Congleton has sustained large areas of development over the period of the last plan and it is of grave concern to the townspeople that the size and scope of the development in the new plan is so large (of the same dimensions as Macclesfield which is a town of twice the size) and the third highest allocation in the Borough. It is important from the perspective of the townspeople and the people of the surrounding parishes that the separateness and distinction of the town and village should be maintained and that the economy of the villages, mostly from agriculture and tourism should not be destroyed in order to allow massive development and expansion of the town.

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- 7.9. Whilst we appreciate that policies such as PS8, H6, SE4 and SE6 are being developed these seem to us to be general in nature and open to interpretation by developers and planning officers alike in such a way that they do not provide any protection for the cases outlined above. Indeed, as touched on above, arguments in favour of development for economic reasons and treating land as infill were given precedence in the above cases. This has led to significant change in the aspect and rural nature of the town and to loss of significant green space. It is, therefore, our view that a stronger protective measure such as green gap should be applied on the perimeter of the town and on those sites within the town that can be identified as green spaces.
- 7.10. Many people are attracted to settle down in Congleton due to its rural nature. It should be appreciated that the very people the town attracts may be less inclined to live in Congleton due to the massive development that is proposed in the Local Plan resulting in the loss of a vast area of the countryside and loss of the town's character and identity. This impact should not be underestimated.

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## **8. References**

- 8.1. Cheshire East Local Plan Shaping Our Future A Development Strategy for Jobs and Sustainable Communities
- 8.2. Cheshire East Local Plan Shaping Our Future Policy Principles.
- 8.3. Strategic Housing Land Availability Assessment (SHLLA) Update January 2013 (this we understand to be the recently revised SHLLA)
- 8.4. Strategic Housing Market Assessment (SHMA) September 2010
- 8.5. Local Transport Plan Final Strategy (2011-2026)

## **9. Appendix – Back Lane and Radnor Park Site Adjustment**

The diagram below shows a proposed reduction to the western edge of the site. The site outline as shown in the Development Strategy is shown in blue below overlaid on a Google Map. The suggested alteration in the site is shown by the line in yellow. Basically, this reduction does not have the site crossing Blackfirs Lane and helps keep a better green buffer between Congleton and the parish of Somerford.





