

Protect Congleton – Civic Society Comments on the Cheshire East Local Plan Issued for Public Consultation on 5th November 2013

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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.

Contents

1. Summary and Overall Comments on the Local Plan	2
2. Local Plan Documentation and Comment Submission	2
3. Green Belt.....	3
4. Housing and Population Projections	3
5. Link Road and Transport Aspects of the Local Plan	5
6. Strategic Sites and Other Development Areas	9
7. Business Expansion	13
8. Countryside.....	14
9. References	17
10. Appendix A – SHLLA Areas to be Protected	17

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

1. Summary and Overall Comments on the Local Plan

The Local Plan is difficult to understand and it is not clear where, 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. To compound matters the strategic sites identified for Congleton are only provided as “indicative” locations; until the route of the proposed Link Road is decided the location of the sites will not be determined. Until the site locations are decided it is not possible to fully assess the impact they will have 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. 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 six main documents consisting of over 2,000 pages of material, as well as many other supporting documents that need to be consulted to get a complete picture of what is being proposed (the supporting documents are the SHMA (Reference 9.4) SHLLA (Reference 9.3) and Transport Strategy (Reference 9.5).
- 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? If people do not have internet access what measures been taken to ensure that they have easy access to the Local Plan?
- 2.5. Cheshire East’s preferred mechanism for reviewing the information is electronically with very few paper copies distributed, and this is to be endorsed in terms of cost and the impact on the environment. However, it is unforgivable that information is sometimes presented with text presented vertically. This can, for example, be seen in Section 16 of the Core Strategy (Reference 9.1) where the tables are orientated vertically on the page. Basically the tables should have been presented in “landscape” mode instead of “portrait” mode so that the tables can be easily read. A reader is able to view the information in a landscape manner by accessing a view option when using the PDF file viewer Adobe Reader, although we suspect many people will not know of this facility and, frankly, they should not need to know. The information is vast and is difficult enough to read without making the reader’s task unnecessarily harder.

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

3. Green Belt

- 3.1. On behalf of the residents whom we represent we should like to express our deep opposition to the general principle that green belt land should be made available for housing development. We are not convinced that there is sufficient need or demand to justify the sacrifice of land that separates the towns and that, generally, preserves green space and wildlife habitat for future generations. We are aware that there are substantial brownfield sites throughout the Borough and also that the level of need in this area has been artificially inflated to justify this policy.
- 3.2. It is our view that the heritage of future generations is being despoiled by this process and we believe that the views of the residents of Cheshire East have been given insufficient weight in the decision-making. We made extensive comment in our earlier submission with regard to the inadequacy of the provision of protected green space and we still believe that more protection should be made available to ensure that the distinctive nature of our market towns and villages is retained.

4. Housing and Population Projections

- 4.1. We would like to express concern about the forecasts and the implications of these. The Core Strategy Paragraph 8.10 (Reference 9.1) describes Scenario 6 to be the best fit and goes on to state:

It forecast that providing an average of 1,350 dwellings per annum or 27,000 dwellings over the Plan period would provide for a population increase of around 39,800 people, a labour supply increase of around 16,400 people and an increase of around 13,900 jobs to 2030.

- 4.2. However, note that Table A.6 of the Core Strategy shows the total dwellings to be built as 29,287. The correct figure for the Cheshire East housing supply over the plan period needs to be used in all areas of the Core Strategy to avoid any possible confusion. The figure of 27,000 dwellings is quoted in the previous Local Plan released in January 2013 and there is no explanation as to why this figure should have increased by almost 8%. It is possible that an unintentional error has been introduced; see Paragraph 6.2 in this document for an explanation of what may have occurred for Congleton's housing figures.
- 4.3. We understand that the methodology used in reaching this forecast and these figures, as explained in "Population Projections and Forecasts" (Reference 9.6) is based on national and regional population statistics and forecasts, and on the information contained in the SHLAA. We recognise and acknowledge that the data shows that Cheshire East 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 9.4) 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.

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

- 4.4. We note that the figures given above, 39,800: 27,000: 16,400, could be expressed as 10 units of occupancy are required for every 14.8 units of population and this generates 4 units of labour within the area. Taken logically, if this were to be reflected within the housing-building programme, this would require over 50% 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.
- 4.5. The SHMA (Reference 9.4) states that 56.1% of newly forming households will require affordable housing. This is far in excess of the 30% requirement proposed in Policy SC 5 of the Core Strategy (Reference 9.1). 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. 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 7 and 8 of Policy SC 5 provide substantial get-out clauses to allow developers 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 9.4) and the Local Plan and the actual conditions for delivery.
- 4.6. 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 50% 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.
- 4.7. With particular regard to the effects of these proposals for the town of Congleton we should like to make the following observations.
- 4.7.1 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.
- 4.7.2 The figures taken from the SHMA (Reference 9.4) show that Congleton currently has 11,561 homes. The proposal is that over the period of the plan 3,709 additional homes should be built. Increasing Congleton's housing stock by over 30% in twenty years (actually 3,500 houses over 17 years at the date of this consultation) is ambitious by any standards and would seem unrealistic for a town of Congleton's size, infrastructure and needs.
- 4.7.3 The 50% single occupancy is likely to be 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. Recent planning applications submitted for Congleton do not support such a housing profile, e.g. we have an application to build 30 affordable houses all 3-bedroomed with a further 36 3-bedroomed and 38 4-bedroomed houses. This housing profile is typical of any major development in the area.

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

- 4.8. Notwithstanding the above comments the Local Plan information needs to be submitted and accepted by the Government Planning Inspectorate. One of the things that will be expected is that the Local Plan and supporting information provides credible evidence of a 5-year housing supply. How does the information provided support a credible 5-year housing supply, especially as similar information has not been accepted by the Planning Inspectorate at a recent Cheshire East planning application appeal?

5. Link Road and Transport Aspects of the Local Plan

- 5.1. It is understood that the Link Road is an essential part of the economic strategy of the Local 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 associated with the Local Plan 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 of 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.
- 5.2. We note that the southern end of the Link Road still 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 9.4) 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.
- 5.3. The Link Road is shown as a “Congleton Link Road Corridor of Interest” on Figure 15.25 of the Core Strategy. Whereas the previous version of the Local Plan proposed a number of options for the route of the road. The revised Core Strategy has extended the potential routes (i.e. via the corridor of interest) to a huge area. This makes it difficult, almost impossible, for anyone to make objective comments on the Link Road’s proposed route.
- 5.4. An obvious comment that can be made on the “corridor of interest” is that it encompasses all of the five sites proposed for Congleton, and in most instances most of the area of the sites. This implies that, potentially, the Link Road could be routed through one or more (even all) of the proposed sites. Why has such an irrational decision been taken? Surely it is completely impractical to consider routing the Link Road through any site? This would have unjustifiable consequences for things such as highway safety, noise pollution and air pollution for the residential developments that could have a Link Road a matter of a few metres away. The Link Road should be sited away from all the sites, presumably to the north.

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

- 5.5. 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.
- 5.6. 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:
- 5.6.1 The route for the Link Road needs to be confirmed and, as for Point 5.2, the Link Road should be connecting the south A34.
 - 5.6.2 We understand that the Link Road will be single lane in each direction; this should be confirmed in the Core Strategy (Reference 9.1).
 - 5.6.3 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 may be close to the development sites and may even run through the development sites. 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)?
 - 5.6.4 What is the realistic time scale for starting and completing the development of the Link Road?
 - 5.6.5 How will the development sites be connected to the Link Road? There could be in the order of eleven 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?
 - 5.6.6 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?
 - 5.6.7 How will cyclists and pedestrians be catered for?
 - 5.6.8 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?
- 5.7. Link Road Funding Strategy. There is very little information in the Core 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:
- 5.7.1 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?

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

- 5.7.2 It is understood that developers will need to contribute to the funding of the Link Road. On the surface, the developers' contribution 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.
- 5.7.3 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, or 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 how will the Council enforce this?
- 5.7.4 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?
- 5.7.5 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?
- 5.7.6 Will it only be the dwellings (houses and business premises) on the Strategic Sites that will help fund the Link Road? There are 600 other dwellings mentioned as Site Allocations that are not situated on the Strategic Sites, see Table A.2 of the Core Strategy (Reference 9.1).
- 5.7.7 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.
- 5.7.8 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.
- 5.7.9 Will all other types of development be required to contribute to the Link Road (e.g. schools, doctors, nurseries etc.)?
- 5.7.10 There has been mention of a cost of £10,000 per house for the Link Road funding. This is 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 impact especially the lower income residents and 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?

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

- 5.7.11 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?
- 5.7.12 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 zero raised by 2015, £3.8m by 2020, another £8.2m by 2025 and another £10m 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
- 5.7.13 Will this funding impact in any way the Council Tax Bands of the dwellings?
- 5.8. 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.
- 5.9. 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. The Core Strategy (Reference 9.1) Paragraph 15.209 says the Link Road will assist in the “*reduction in community severance along key town centre corridors*” – it is not clear how this will work.
- 5.10. 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.
- 5.10.1 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?
- 5.10.2 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.
- 5.10.3 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. There are also currently proposals for housing development which would add further danger to this proposed junction.
- 5.10.4 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.

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

5.10.5 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 on the proposed route.

6. Strategic Sites and Other Development Areas

6.1. There are five strategic sites proposed in the Core Strategy (Reference 9.1) all situated to the North of the town along the “corridor” 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 Core Strategy. The first entries cover the Strategic Locations (SL) and Core Strategy (CS) sites listed from East to West as in the Core Strategy. The other three entries cover: “*Completions*” (house builds already complete), “*Commitments*” (it is assumed that these are areas where planning permission has already been granted) and “*Site Allocations*” (presumably any one of the areas identified in the SHLAA (Reference 9.3) for Congleton) all taken from Table A.2 on Page 349 of the Core Strategy.

6.2. It is noted that in the Core Strategy (Reference 9.1) that there are contradictory figures for the total new homes for Congleton: Policy PG 6 at Paragraph 8.65 states 3,500 new homes as did the previous version of the Local Plan; Table 8.4 (Page 71) and Table A.2 (Page 349) have a figure of 3,709. We wonder whether this discrepancy is due to the fact that since the previous issue of the Local Plan the house completions have increased from 148 to 209 and the Commitments have increased from 552 to 700, i.e. a total increase of 209 houses – this being the difference between 3,500 and 3,709. Perhaps the error is that the Site Allocations (see Table A.2) should have been reduced by 209, i.e. Site Allocations should be 391. This type of contradictory information may also apply to the other towns in the Core Strategy.

Sites 30 houses per hectare	Site Capacity	Houses in Plan Period	Phasing for House Builds				Employ Land (ha)	Retail Units	New Primary School
			2010 - 2015	2015 - 2020	2020 - 2025	2025 - 2030			
Back Lane and Radnor Park SL6		500	0	0	125	375	10	Yes	Yes
Congleton Business Park Extension SL7		450	0		200	250	10	Yes	No
Giantswood Lane South CS 16		150	0	120	30		0	No	No
Giantswood Lane Manchester Road SL8		550	0	0	175	375	0	Yes	No
Manchester Road - Macclesfield Road CS17		550	0	262	288	0	0	Yes	Yes
Strategic Sites Totals		2,200	0	382	818	1,000	20		
<i>Completions 2010-13</i>	<i>n/a</i>	<i>209</i>	<i>n/a</i>	<i>n/a</i>	<i>n/a</i>	<i>n/a</i>	<i>0</i>		
<i>Commitments</i>	<i>n/a</i>	<i>700</i>	<i>unknown</i>	<i>unknown</i>	<i>unknown</i>	<i>unknown</i>	<i>0</i>		
<i>Site Allocations</i>	<i>n/a</i>	<i>600</i>	<i>unknown</i>	<i>unknown</i>	<i>unknown</i>	<i>unknown</i>	<i>0</i>		
Totals		3,709	0	382	818	1,000	20		

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

The Back Lane and Radnor Park site will also have a Leisure hub adjacent to Back Lane Village Green and the existing playing fields near to Back Lane are to be retained.

- 6.3. Firstly it is difficult to make constructive comments on the five sites identified for Congleton as the precise location of these sites is still to be determined once the route of the Link Road has been determined, e.g. Paragraph 15.211 of the Core Strategy says *“For the avoidance of doubt, the boundaries for the following strategic locations are indicative and will be defined in the Site Allocations and Development Policies document once the preferred route of the Link Road is confirmed.”* Furthermore, the Link Road “Corridor of Interest” encompasses around 80% of the “indicative” site locations (see Paragraph 5.3 of this document). If the Link Road is eventually routed through these indicative site locations then this could have a significant impact on the eventual sites locations. For example, assuming the sites are still located in a similar area then each site could be split into two areas dissected by the Link Road and, because of the obvious highway safety impacts as well as business and traffic noise pollution and air pollution, part or all of a site may need to be moved further north thus swallowing further swathes of countryside.
- 6.4. How can residents of Congleton be expected to make comments on the Local Plan when the locations of the proposed strategic housing and business developments areas, along with the route of the Link Road, have yet to be determined? This is clearly unfair and coupled with the wealth of information presented for comment to have this statement about “indicative locations” hidden away in a minor paragraph of the Core Strategy is disingenuous to the Congleton community. At the very least such a statement about the indicative nature of the sites should be highlighted at the beginning of the description for Congleton just prior to the first picture of the sites, i.e. as part of Paragraph 15.207 of the Core Strategy. In the previous issue of the Local Plan there was mention that the site maps were indicative but this was read as meaning that due to the scale of the maps then the “precise” boundary of a strategic site was indicative and there was no mention about the route of the Link Road affecting the strategic site locations, this is woefully inadequate communication by Cheshire East.

The following comments are made on the assumption that the location of the Congleton sites is as presented in Figure 15.24 of the Core Strategy (Reference 9.1).

- 6.5. 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.
- 6.6. There is no phasing of the house builds for the “Site Allocations”, this phasing should be provided so that the house building for the plan period can be fully understood.
- 6.7. 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.
- 6.8. Following on from the comment above there is no indication of the types of housing that will be built on each of the 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?
- 6.9. There is no consideration for the schools (primary and secondary) for the 600 dwellings referred to in the “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.

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

- 6.10. Although there are two 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 Core Strategy for Congleton, especially as existing Secondary schools have limited capability for expansion. Also, are two new primary schools sufficient for over 2,000 houses to be built on the sites?
- 6.11. There is no requirement for nursery provision in the plan.
- 6.12. What facilities will be put in place for the younger community so that they see the town as a viable and realistic option?
- 6.13. 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.
- 6.14. 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?
- 6.15. 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.
- 6.16. For the Strategic Sites what routes will the local traffic 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. The absence of a detailed strategic plan and assessment of existing local roads means that the capacity of the existing road network to accommodate the extra traffic generated by proposed development has not been properly estimated. Given that this particular town suffers immensely from over-crowding on the roads and from severe pinch points in the older part of the town and on the through-roads this does seem to be poor planning and a massive lack of foresight.
- 6.17. Back Lane and Radnor Park Site:
- 6.17.1 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.

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

- 6.17.2 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.
- 6.17.3 It is noted that this site has been reduced at its western edge as we suggested in our comments on the previous issue of the Local Plan material. However, it is difficult to accurately gauge where the boundaries of the site are but they would seem to be very close to Somerford. So the western edge of the site should not cross Black Firs Lane to maintain a buffer between Somerford and Congleton.
- 6.18. There is no mention of the Congleton brownfield sites in the Core Strategy It is understood that the Congleton brownfield sites could deliver up to 780 houses. There should be a commitment in the Local Plan that, where viable, brownfield sites will always be used for housing development in preference to other sites for the 600 houses earmarked to the “Site Allocations”.
- 6.19. 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.
- 6.20. 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.
- 6.21. How much communal green space will be allocated within each of the sites and how will this be enforced during development?
- 6.22. The development of the five 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. This would appear to directly contradict claims that this will stimulate town centre recovery.
- 6.23. The previous version of the Local Plan’s Development Strategy in Appendix C at C.39, C.40, C41 and C.42 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 Pan)?
- 6.24. 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?

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

- 6.25. 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?

7. Business Expansion

- 7.1. 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 attract to Congleton as a result of the Link Road? Has Cheshire East carried out a feasibility/viability study for what businesses may be attracted?
- 7.2. 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?
- 7.3. 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.
- 7.4. 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?
- 7.5. 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 at a public meeting two farmers expressed concern that their farms could be rendered unviable by unwelcome land acquisition.
- 7.6. 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 locally so that they see the town as a viable and realistic employer?
- 7.7. Similarly, how has Cheshire East considered the needs of the older work force in its proposals to generate further employment?
- 7.8. How many new jobs in Congleton does Cheshire East expect the development and Link Road to generate? The Core Strategy (Reference 9.1) states an overall growth figure for Cheshire East of 15,000 jobs rising to 20,000 jobs. whereas the Congleton Town Council has an outrageously high figure of 3,500 new jobs for just Congleton, implying over 200 new jobs per year during the 17 years remaining of the plan period. It is noted that the advertisements in the town's local paper currently average 12 per week. The proposed increase does not seem feasible and that even at national level this rate of job generation would be considered optimistic.

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

8. Countryside

- 8.1. 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 residents have indicated that they would like to see some form of protected status for these areas.
- 8.1.1 Open Countryside: The corridor of interest 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 unnuclated 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
- 8.1.2 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.
- 8.1.3 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.
- 8.1.4 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.
- 8.2. As mentioned at Point 8.1, 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 8.1, 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.
- 8.3. Will Cheshire East be carrying out any habitat surveys to ascertain 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.

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

- 8.4. 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.
- 8.5. 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.
- 8.6. 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.
- 8.7. We should like to propose that the following areas are removed from the SHLLA (Reference 9.3) and given some kind of protected status (these areas are also highlighted on a copy of Congleton’s SHLAA diagram, see Appendix A in Section 10).
- 8.7.1 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.
- 8.7.2 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.

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

- 8.7.3 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.
- 8.7.4 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.
- 8.7.5 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.
- 8.7.6 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.
- 8.8. 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.
- 8.9. 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.
- 8.10. 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.

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

9. References

- 9.1. Cheshire East Local Plan Pre-Submission Core Strategy November 2013
- 9.2. Not Used.
- 9.3. Strategic Housing Land Availability Assessment (SHLLA) Update January 2013 (this we understand to be the recently revised SHLLA)
- 9.4. Cheshire East Strategic Housing Market Assessment (SHMA) 2013 Update
- 9.5. Local Transport Plan Final Strategy (2011-2026)
- 9.6. Cheshire East Local Plan Background Paper: Population Projections and Forecasts September 2013

10. Appendix A – SHLLA Areas to be Protected

The following is a copy of the Congleton SHLLA map and has been overlaid with “red arrows” showing the sites referenced at Paragraph 8.7 that should be afforded a protected status.

