

# PRESTBURY PARISH COUNCIL REPRESENTATIONS ON THE CHESHIRE EAST COUNCIL DRAFT LOCAL PLAN (SUBMISSION VERSION) OF MARCH 2014

## OVER-ARCHING COMMENTS

Prestbury Parish Council have any number of issues with regards to the soundness of the Cheshire East Draft Local Plan (Submission Version) of March 2014.

At each stage in the evolution of the Local Plan, we have expressed our concerns about the very high level of growth that the principal authority is aiming for, the low percentage of brownfield land allocations and the potential widespread impacts of the strategy. We have questioned whether the evidence presented has justified the level of housebuilding sought and the amount of employment land allocations which together have had the consequence of fuelling demand for further support infrastructure and placing huge pressures on the wider countryside, Green Belt and smaller communities such as ourselves.

We object strongly to the amount of Green Belt proposed for deletion (383 hectares), to the lack of a transparent audit trail explaining why certain sites were selected for removal from the Green Belt and to the fact that there was no dedicated and obvious Green Belt review consultation. Stakeholders and residents were supposed to understand this was an integral part of the Pre-Submission Strategy consultation which was an unexpected and rushed extra stage inserted into the Plan preparation process immediately prior to Christmas 2013. Many stakeholders and members of the public were unaware of the Green Belt Assessment document published alongside the Pre-Submission Version - which failed to mention it. That apart, there has been no indication at this late stage of the Plan process of where Green Belt might yet be lost in order to provide for smaller development sites.

The 13 Local Service Centres, of which Prestbury is one, are expected to play their part in providing for the high growth strategy by accommodating between them 2,500 houses (an average of 192 each) and five hectares (an average of 2.5 acres) of employment land. But some of these - like Prestbury - are tightly surrounded by Green Belt and have no remaining undeveloped sites within their built areas. For them the comment is simply made that:

*“This may require small scale alterations to the Green Belt in some circumstances”*  
(Vision for Local Service Centres, paragraph 8.30, page 66) and also:

*“In the Local Service Centres, small scale development to meet localised objectively assessed needs and priorities will be supported where they contribute to the creation and maintenance of sustainable communities.*

*The Local Service Centres are Alderley Edge .... **Prestbury** ... and Wrenbury ”*

(Policy PG2, Settlement Hierarchy, page 67, our highlighting)

At no point yet in the Local Plan process has there been a locally assessed need debate (as opposed to the Strategic Housing Market Assessment) with Parish Councils focused on the Local Service Centres. Prestbury Parish Council have received no direct approach from the principal authority to participate in a housing or transport needs appraisal and our contributions and questions at every stage of the Local Plan to date have been ignored. (This includes our comments on the Strategic Housing Land Availability Assessment).

In addition, the Local Service Centres and smaller settlements are being told to wait until the Site Specific Local Plan document is published to discover how the surrounding Green Belt/ countryside is likely to be impacted. This approach is inadequate and unsatisfactory.

The importance of the Green Belt has been underplayed throughout the evolution of this Local Plan and the proposition of a Green Belt 'swop' does not stand up in planning terms. Oddly, the Plan proposes a new area of Green Belt on one side of Crewe only. If this were a well thought-through proposition, it would be a proposal for a new Green Belt around the whole of Crewe so as to properly define and contain the 'High Growth City' concept. As it is the current proposal would not stop sprawl into the countryside around other sides of Crewe and it does not relate to the significant Green Belt loss in the north of the Borough.

Green Belt is only supposed to be appropriated where 'exceptional circumstances' can be proved because the fundamental factor about Green Belt is supposed to be its permanence. Exceptional circumstances are not apparent in many instances and the principal authority simply desiring a high growth strategy is not a good enough reason. The quality of the land concerned is irrelevant as far as the Green Belt case is concerned. Its five purposes are:

- To check the unrestricted sprawl of large built-up areas
- To prevent neighbouring towns merging into one another
- To assist safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns and
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land

(National Planning Policy Framework, paragraph 80, page 19)

It is apparent from Policy PG6 and supporting text that Cheshire East Council have not only not reduced their housing aspirations but, at this last stage, they have increased them to 29,500 (despite paragraph 1.27 and Policy PG 1 still claiming the original 27,000 figure). The new target includes accepting an allocation of 500 houses from High Peak Borough Council.

Meanwhile the employment land review simply added a buffer of 30% to its reckoning in order to bolster its figures and new roads have been added into the Plan that have not evolved using the Department for Transport's appraisal system and prior to the business cases for them being prepared.

Rather than first of all assessing need and determining to build in the least damaging locations, primarily on brownfield land, the high growth trajectory was set initially in July 2010 when the leaders of Cheshire East, Cheshire West & Chester and Warrington Borough Councils got together and signed up to a document entitled 'Unleashing the Potential of Cheshire and Warrington'. This document, which made no mention of environmental capacity or greenfield versus brownfield and was not consulted on, called for 71,000 new dwellings to be built across the three local authorities in the 20 years between 2010 and 2030 – an average of 3,500 per annum. This was nearly 25% above the average target of 2,847 completions per annum that was identified at that time in Regional Spatial Strategy (RSS) for the three authorities - 1,150 p.a. of which was attributed to Cheshire East. That RSS figure for Cheshire East translated as a total of 23,000 for the following 20 years.

Although all the housing figures tabled as part of the RSS process were discussed as 'high growth' at the time (and subsequently sanctioned), when Cheshire East consulted on its housing figures in its 'Issues and Options' paper in 2010, the figure of 23,000 was described as 'low growth'. The figure of 26,950 houses over 20 years was put forward as being a 'medium growth' option and the figure of 32,000 was described as 'high growth'. Subsequently in the Local Plan process, Cheshire East declared that it was heading for what it had determined was 'medium growth'. However, the figure it has settled on in its Submission Version, including the allocation from High Peak, is two and a half thousand more than its own 'medium growth' figure and only two and a half thousand less than its own depiction of what constituted 'high growth' (see Policy PG6 on page 79).

This Local Plan has also ignored the historic take-up rates for employment land. The RSS panel established that the whole of Cheshire was holding onto far too much employment land. In 2007 it had 28 years' worth – which would have taken it to beyond the period of the current Cheshire East and Cheshire West & Chester's Local Plans. The panel therefore instructed Cheshire to re-allocate some of its employment land for housing and other purposes. Instead of doing this, both of the two new Cheshire Unitary Authorities are each seeking agreement through their Local Plans for 300 new hectares of land to be allocated for employment – just under 1,500 acres cumulatively. Where, we would ask, is the case or logic for this at a time when the country is attempting to pull itself out of a deep recession?

The government requires Local Plans to be:

- Positively prepared (based on a strategy that seeks to meet objectively assessed development and infrastructure requirements)
- Justified (the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence)
- Effective (deliverable over its period) and
- Consistent with national policy

We believe this Plan fails these tests and therefore we contend that the plan is unsound.

Setting aside claims of sustainability interspersed throughout the Plan, there is a lack of balance in its approach. Instead of treating the three pillars of sustainability equally, ie. the economic, environmental and social aspects, the 'growth' agenda is aggressively foremost and, in order to meet it within the Plan period, there would need to be a level of building far beyond anything which has ever been achieved before. Environmental and social considerations are clearly of lesser importance than perceived economic benefits.

It is important to clarify that Prestbury Parish Council has no issues with genuinely sustainable levels of growth which represent a proven need. We note that the housing figure sanctioned by the RSS panel report in May 2007 for the area that now makes up Cheshire East would equate to 23,000 if extrapolated to 2030, ie. an average of 1,150 houses per annum. We also note that, according to the latest Census figures, (which reduced the housing figures), Cheshire East needs to provide an average of 1,050 houses per annum (para. 2.17, page 18).

It should be borne in mind that, at the time the RSS housing figures were accepted by the RSS panel (2007) the UK GDP was at its peak, having experienced a prolonged period of economic boom. Since then the U.K. has been in recession and, although there are some very small signs of recovery, it will be many years before the economy is strong again. Consequently, we would argue that the Local Plan housing figure should be no higher than the required amount of 1,050 p.a., which equates to 21,000 over 20 years, and we would question the principal authority's unrealistic optimism for economic growth in this Plan period and its apparent belief that developers would find it possible to deliver an unprecedented amount of housing over the Plan period.

For clarity, the Parish Council wishes to make it known it is well aware that all Regional Spatial Strategies have been revoked and no longer represent a statutory part of the Development Plan. This matter of fact does not mean that all the work that went into producing them and the opinions of the panels of the country's top planning inspectors who sat in judgement on them are of no relevance or value. The evidence provided at the time and the figures discussed during the last RSS process provide a very useful reference point.

We also fully appreciate that the new Local Plans are more high level/spatial in nature than was formerly the case. However, we contend that the lack of clarity about and lack of proper consultation on the 'High Growth City' city concept, on strategic road building and on Green Belt boundaries is unacceptable.

**Taking all the points we have made together, we contend that the Local Plan is not positively prepared, not justified, not effective and not consistent with national policy.**

## INTRODUCTION

### Key Diagram

The 'Key Diagram' is marginally better than it was in earlier iterations. This one (fig. 1.1. on page 8) at least includes a figurative indication of some sections of a proposed new 'strategic highway' between Poynton and Prestbury (part of the SEMMMS network of roads) and around Congleton. However, in the light of revelations in the Infrastructure Delivery Plan and the 'Engine of Growth' document that the 'strategic highway' in question actually runs from junction 25 of the M60 to junction 17 of the M6 at Sandbach, this ought to be properly illustrated. Up to the Pre-Submission stage of the Local Plan it was not apparent that a series of separate road schemes, including 'improvements' to some roads, all fitted together to form a 30-mile strategic route that passes through Prestbury Parish. Such a major proposal should have been made apparent at earlier stages of the Plan process and the entire route should have been subjected to strategic traffic modelling, a strategic environmental assessment and a wider economic appraisal, none of which has happened.

Still missing from the Key Diagram is a depiction of the SEMMMS A6 to Manchester Airport Relief Road, a feature which we pointed out was missing in our last submission.

Nor does the Key Diagram illustrate the 'High Growth City' concept. The scale of this entity only started to become apparent at the Pre-Submission stage of the Local Plan. Whereas, in the earlier stages of the Plan, this appeared to be a concept that applied only to the wider area around Crewe, we flagged up in our response to the Pre-Submission document a phrase relating to Cheshire & Warrington Local Enterprise Partnership's (LEP's) Strategic Economic Plan (SEP). This phrase has been repeated, unaltered, in the Submission Version yet still there is no visual or textual expansion of what it means. The phrase is:

*"The emerging Cheshire and Warrington SEP includes a number of transformational projects in Cheshire East including High Growth City, **which focuses on linking Crewe and Macclesfield by way of Congleton to create a 'corridor of opportunity'**".*

(Para. 4.4, our highlighting)

This appears to imply a strong relationship between the new strategic road that runs through Prestbury Parish and development aspirations for the 'High Growth City'. But, the interpretation of it in the 'Enterprise and Growth' section of the Submission Version of the Local Plan is different and claims a focus on the M6 corridor (fig. 11.1, para. 11.3, page 96). At the same time, the LEP's Strategic Economic Plan includes their interpretation of the High Growth City - which is different again. Fig. 1.1. in 'Cheshire and Warrington Matters', the LEP's Draft Strategic Economic Plan for Cheshire and Warrington (December 2013), depicts a vast area of growth emanating out from Crewe. It envelops Nantwich, extends into Cheshire West & Chester, (incorporating Winsford and Northwich), and covers Middlewich, Holmes Chapel and Congleton in Cheshire East. But it does not include Macclesfield.

This confusing state of affairs makes it impossible to comprehend the implications of what is proposed or to interact on this major issue. On this alone the Plan fails the soundness tests.

Also missing from the key diagram is the 'Science and Technology Growth Corridor' (which, it would appear, incorporates Prestbury) illustrated separately in the Submission Version (fig. 11.2 on page 98). The key diagram could be a full page, far more comprehensive map, and include these concepts. Meanwhile the text should spell out what these concepts mean in land use terms and supporting documents should explain the business case behind them and the environmental implications. It should also be noted that there is no explanation or illustration of any alternative lower-growth strategy that was seriously considered.

## **Overview**

We object to and disagree with the following statement:

*"The previous overall approach to accommodating development, as set out in the Regional Spatial Strategy, was one of development restraint reflective of the extensive coverage of Green Belt in the Borough and the intention to foster urban regeneration in Greater Manchester and Merseyside in particular"* (Para. 1.3, page 3)

The RSS endorsed quite high levels of growth but concentrated it in previously developed areas by setting very high, statutory, brownfield targets. The targets imposed on the former Districts that make up what is now Cheshire East were: Congleton - 80%, Crewe & Nantwich – 60% and Macclesfield 80%; an average across the whole of 73%. It should be noted that these targets were being met. This was a key factor in protecting the Green Belts which were not initiated by the RSS but by the County Structure Plans and the Urban District Plans. The Green Belts were viewed as an important asset, not a constraint to be cast aside.

We also object to and disagree with the following statement:

*"There are no significant flood risks in the Borough that are an impediment to new development nor are there any other naturally occurring environmental features within Cheshire East or nearby that present such constraints. The effective operation of the Jodrell Bank radio telescope does not pose a significant restriction on new development"* (Para. 1.13, page 3)

As the Environment Agency's maps testify, there are flood plains throughout Cheshire (East and West), which should be illustrated. This includes stretches of the Rivers Bollin and Dean that run through Prestbury Parish. Cheshire is noted for its ponds, meres and mosses. A notable feature is the sandstone ridge that is 'The Edge' at Alderley, relevant to Prestbury as the south west of the Parish is on the ridge. As far as Jodrell Bank is concerned, this is an international resource that has been shortlisted as a potential UNESCO world heritage site. It is unlikely the vast development plans inside the Jodrell Bank consultation zone will have no impact on the telescopes but, in any event, the setting of them is crucially important.

## COMMENTS ON THE CEC LOCAL PLAN PRE-SUBMISSION & SUBMISSION VERSIONS

Prestbury Parish Council's comments on the CEC Pre-Submission Version of the Local Plan, made in December 2013, had no effect on the final Submission Version but we believe they are highly relevant to our 'soundness' case and would like them to be taken into account by the Planning Inspector appointed to oversee the examination in public into the Plan. We therefore replicate them below, although we have updated the paragraph/ page references.

### 1. BACKGROUND

#### Object

The *"rich natural environment"* is one of the three assets credited equally with making East Cheshire *"one of the best places to live and work in the UK"* (para. 1.1, Pre-Submission Version/ para. 1.21, Submission Version).

Additionally, the plan commits to *"minimising the impact on the natural environment"* (of providing *"new land for development"* (para. 1.5, Pre-Submission Version/ para. 1.26, Submission Version) but it aspires to:

*"deliver 27,000 new homes by 2030 and 20,000 jobs in the longer term"*  
(para. 1.6, Pre-Submission Version, para. 1.27, Submission Version)

This level of housebuilding is significantly more than the official estimates require following the revision of the population figures post the 2011 Census. Is there sufficient evidence that these aspirational figures – which bear no resemblance to housebuilding attainments in the past - are actually achievable? Would it not be more sensible to have more modest aspirations for the period of this plan – ones which would not have such significant implications for communities and the environment?

It is easy to support the statements made (in para. 1.18 of the Pre-Submission Version/ para. 1.27 of the Submission Version) about responding to household projections and providing the right mix of housing and to the comment (in para. 1.19 of the Pre-Submission Version/ para. 1.45 Submission Version) about the good health of much of the population but the latest household projections from the DCLG do not prove the case for 27,000 new houses during the period of the Local Plan and, in order to provide so many, there would be environmental capacity issues which could have quality of life impacts.

The statement is made:

*"This Plan is strongly underpinned by a need to improve transport connections across the Borough"*  
(para. 1.12, Pre-Submission Version/ para. 1.36 Submission Version)

It goes on to list the Congleton and South Macclesfield Link Roads, A51, A530 and A500.

Where is the robust evidence of the ‘need’ for so much new road infrastructure and of it having been collected in the order prescribed by the DfT in their WebTAG transport appraisal? It should be noted that no business case had yet been published for either the Congleton Northern Relief Road or the Poynton Relief Road. These should have been prepared first to make the case for them. Similarly, the DfT’s transport appraisal system demands that a variety of options to identified transport problems should be considered and thoroughly investigated – and not just road building. This has not happened.

Also, the claim is made that

*“The focus remains on protecting Green Belt, open spaces and our best agricultural land to ensure that growth is sustainable”*

(para. 1.13, Pre-Submission Version/ para. 1.37 Submission Version)

Yet proposed new roads such as the SEMMMS roads run through Green Belt where it is productive agricultural/grazing land.

[N.B. Some of the following comment was addressed between the Pre-Submission and Submission Versions and this is accepted in the over-arching comments above ... In addition, it should be noted, the Strategic Highways Infrastructure illustration (Fig. 1.1) fails to give any impression of the extent of the two SEMMMS roads in the plan (the east-west A6-Manchester Airport Relief Road and the north-south Poynton Relief Road). It merely places a small asterisk close to Poynton, near to where the two SEMMMS roads would join. It does not show Prestbury as being impacted]

and it does not give anything amounting to an accurate impression of the scale of the full SEMMMS network of roads, which also extend through Stockport.

There is a reference to Green Belt study work in the Introduction but it gives the impression that there is a plan sometime in the future to review the Green Belt in and around Crewe and Nantwich and to some mitigation work. The phrase used is:

*“Following an extensive Green Belt Study, we are planning to review the extent and effectiveness of protection in and around Crewe and Nantwich. We are also proposing new settlements to mitigate some of the impact on existing Green Belt”*

(para. 1.14, Pre-Submission Version/ para. 1.40 Submission Version)

This statement is wholly inadequate because it does not make reference to the two Green Belt background documents that were published at the same time as the pre-submission document, it does not explain that this public consultation is effectively the only opportunity prior to the submission of the Local Plan to government where the public and stakeholders can take part in a Green Belt review and nor does it refer to the principal authority’s plans to alter the Green Belt in the North of Borough. On the contrary, the phrase quoted above and the following one are very reassuring that there is nothing to be concerned about in respect of Green Belt. The following phrase is:



*“Protecting the quality of the environment is essential to our Plan. We need to ensure the right levels of green belt to protect from urban sprawl and provide sufficient levels of fertile agricultural land to support our rural economy. We also need to nurture our ecology and protect the natural countryside and landscape enjoyed by our residents and visitors alike”*  
(para. 1.15, Pre-Submission Version)

[The wording was changed slightly for the Submission Version to:

*“Protecting the quality of the environment is essential to the Plan. The Plan needs to make sure there are the right levels of Green Belt to protect from urban sprawl and provide sufficient levels of fertile agricultural land to support the rural economy. The Plan also needs to nurture the local ecology and protect the natural countryside and landscape enjoyed by residents and visitors alike”]*  
(para. 1.41, Submission Version)

Yet the Plan in fact proposes to close up the Green Belt between Greater Manchester and Cheshire East by means of a new settlement \* and also the east-west A6 to Manchester Airport Relief Road and the connecting north-south Poynton Relief Road which would run through Prestbury, inevitably bringing developer attention along the length of the new roads.

And, the background document, ‘Green Belt Assessment, September 2013’ reveals that two of the smaller Green Belt areas targeted are in the centre of Prestbury Parish. The areas of land in question – PRE05 and PRE06 - are part of the Bollin Valley Way, a flood zone and a recognised environmental corridor. The river valleys make a hugely important contribution to the landscape of the Borough and normal practice would be to protect them. We strongly oppose this proposal.

## **THE CONTEXT OF THE CORE STRATEGY**

### **Object**

Very oddly, para. 2.5 (in the Pre-Submission Version/ para. 1.47 in the Submission Version) fails to mention that Cheshire East has boundaries with Trafford and Derbyshire - although it is possible to run directly into High Peak District from the north east of the borough without passing through the Peak District National Park, which is mentioned. This is evident from fig. 2.1 (in the Pre-Submission Version/ fig. 1.2 in the Submission Version) where it can be seen that there is a boundary with Derbyshire outside the National Park running between Disley (in Cheshire East) and New Mills (in High Peak) and between Kettleshulme (in Cheshire East) and Whaley Bridge (in High Peak).

\* Handforth East

## 2. SPATIAL PORTRAIT

### Object

The comments about the number of people employed in pharmaceuticals (at Astra Zeneca) (in para. 3.4 of the Pre-Submission Version/ para. 2.4 of the Submission) are somewhat misleading. Although there was a recent announcement of significant investment in its Macclesfield production site which will secure some existing jobs there, (N.B. new jobs mentioned when the announcement was made in October were temporary construction ones), the company is continuing with its plans to move 2,900 research and development jobs to Cambridge. This is relevant to the future fortunes of Prestbury as many AZ employees have lived in the Parish over the years.

The scientific importance of Jodrell Bank is acknowledged (in para. 3.8 of the Pre-Submission Version/ para. 2.8 of the Submission Version), as is its major contribution to the visitor economy (in para. 3.13 of the Pre-Submission Version/ para. 2.13 of the Submission Version). In addition, it is referred to as being of “*historical and scientific significance*” (in para. 11.24 of the Pre-Submission Version/ para. 11.25 of the Submission Version) . It is important to keep all of these citations in mind when considering the proposals for the Congleton Northern Relief Road and all the infill development along it – almost all of which is within the Jodrell Bank Exclusion Zone created originally by Cheshire County Council in their Structure Plan and recognised in the Local Plans for Congleton and Macclesfield.

It is relevant to Prestbury whether or not the Congleton Northern Relief Road is built because, if that does become a reality and so do the SEMMMS roads, then the bulk of a new strategic road between the M60 and South East Manchester and the M6 is established and it would run through Prestbury.

For the first time Cheshire East, (in para. 3.12 of the Pre-Submission Version/ para. 2.12 of the Submission Version), recognises that internet shopping is having an impact on retail centres but, instead of factoring this into its spatial planning, it has unrealistic expectations of being able to buck the trend.

The paragraph on the ‘Visitor Economy’ (3.13 in the Pre-Submission Version/ para. 2.13 in the Submission Version) is very disappointing because it says absolutely nothing about the ‘value’ of the countryside or the Green Belt/Green Gap setting of the towns and villages. It totally fails to recognise its critical role in this respect.

Para. 3.17 (in the Pre-Submission Version/ para. 2.17 in the Submission Version) quotes some figures from the 2011 Interim Household projections. The key point is that Cheshire East has a desire to allocate land for many more houses than are needed. This is unsustainable.

The three-sentence paragraph on ‘Landscape Character’ (para. 3.22 in the Pre-Submission Version/ para. 2.22 in the Submission Version) makes no reference to the small field

patterns and hedgerows that are a key feature of Cheshire and says nothing about the number of natural ponds – another exceptional feature.

There is simply a one-sentence, unillustrated paragraph about Green Belt (para. 3.27 in the Pre-Submission Version/ para. 2.27 in the Submission Version) and it does not flag up the proposals to change its boundaries. Nor does it reference important background documents on Green Belt and it fails to raise awareness of the fact that this consultation is in fact the one and only opportunity to comment on the Green Belt review prior to the final version of the Local Plan being submitted to the DCLG.

N.B. The Green Belt is actually illustrated in fig. 3.9 (of the Pre-Submission Version/fig. 2.9 of the Submission Version) in a map entitled 'Connectivity Map of Cheshire East', under the generic heading of 'Connectivity' – a very strange place to position this information unless the intention had been to show where proposed new roads would run through Belt. However, this is not the case as the map in fact only shows existing roads and railway lines. It also does not show where the HS2 would run. Nor is HS2 mentioned in the text of para. 3.29 (of the Pre-Submission Version) [although it is briefly mentioned in para. 2.30 of the Submission Version].

Para. 3.28 (of the Pre-Submission Version/ para. 2.28 of the Submission Version) on carbon dioxide emissions is wholly inadequate. There is no reference to agreements signed up to by the Borough and Air Quality Management Areas (AQMAs) should be illustrated.

Under 'Principal Towns' there is no mention of the granting of permission for the redevelopment of Macclesfield town centre (para. 3.38 of the Pre-Submission Version) [but it is referenced in para. 2.41 of the Submission Version] and no reference to how unpopular this was and the volume of opposition to it. (Prestbury P.C. objected).

In the descriptions of the 'Principal Towns' and the 'Key Service Centres' it would have been useful to have had the numbers of empty retail premises quoted and in the reference to Local Service Centres (paras. 3.71 & 3.72 of the Pre-Submission Version and paras. 2.77 & 2.78 of the Submission Version), of which Prestbury is one, it would have been useful to have been quoted the populations of these centres for comparison as well as the numbers of empty units.

In the description of surrounding areas, the North Staffordshire Green Belt is referenced (para.3.77, Pre-Submission Version/ para. 2.83, Submission Version) and so is the Greater Manchester Green Belt (para. 3.83, Pre-Submission Version/ para. 2.89 Submission Version) but neither are depicted here (although they are elsewhere).

There is an unsubstantiated claim in the 'Greater Manchester' section (para. 3.82, Pre-Submission Version/ para. 2.88, Submission Version) that the SEMMMS roads "*are needed*" and there is a claim, in the 'Peak District, High Peak and Staffordshire Moorlands' section (para. 3.96, Pre-Submission Version) that the towns of Whaley Bridge and New Mills will "*benefit*" from the SEMMMS roads [changed in para. 2.98 of the Submission Version to

*“will benefit from the transport improvements identified in the A6 Corridor Study*]. There are no balancing statements about the need for better public transport and modal shift.

The document claims compliance on the issue of the ‘Duty to Co-operate’ (para. 3.99, Pre-Submission Version/ para. 3.1, Submission Version) but it would appear that no neighbouring authorities are picking up some of Cheshire East’s housing allocation (a perfectly normal practice) and Stockport MBC have reservations about the proposal for a new settlement on their borders at Handforth East which would close up the Green Belt between Greater Manchester and Cheshire East.

## **[CHAPTER 3 IN PRE-SUBMISSION VERSION/ CHAPTER 5 IN SUBMISSION VERSION]: VISION**

### **Object**

The supporting text to the ‘Vision’ should focus primarily on quality of life and all that that entails, not on economic prosperity. (QoL is mentioned in the actual policy but not until the fourth paragraph).

Also, the commitment in para. 4.4 (of the Pre-Submission Version/ para. 5.4, Submission Version) is to place development in areas *“that are well connected **to** existing areas”*. The commitment ought to be to place as high a percentage of development as possible on previously developed/ brownfield land and, ideally, to set a target. Such a firm commitment is missing.

For what it is worth, para. 4.2 (of the Pre-Submission Version/ para. 5.2, Submission Version) does recognise *“the Borough’s outstanding environment, including its attractive countryside”* and it does say in para. 4.6 (of the Pre-Submission Version/ para. 5.6 of the Submission Version) that growth *“should not be at the expense of the attractive environment”*. But the supporting text to the policy does not speak of the importance of conserving land which is used for food production and the Green Belt and Green Gap background documents identify many areas of attractive and/or productive countryside for future development.

The policy itself (on p. 43 of the Pre-Submission Version/ page 47 of the Submission Version) makes the briefest reference to having a *“productive countryside”* (second para.) but not to ensuring the amount of that productive countryside is not diminished or not significantly diminished.

There is a commitment in the policy to *“reduce the need to travel”* (para. 3) insofar as where new employment and housing is located and, again in para. five, there is a commitment to *“sustainable patterns of [new] development that enable a high proportion of people to travel by public transport, cycle or on foot”*. However, the same commitment is not given in respect of anything other than new development.

It is unclear where “our many areas of landscape value” are. The only landscape which has national value is that on the eastern boundary which is in the Peak District National Park. And the reference to Green Belt is misleading because it refers to Green Belt that would remain so-designated after the current review and the endorsement of the Local Plan.

## **[CHAPTER 5 IN PRE-SUBMISSION VERSION/ CHAPTER 4 IN SUBMISSION VERSION]: THE CASE FOR GROWTH**

### **Object**

The ‘policy’ (ie. the text in the green box) is not framed in a traditional manner. It is a moot point as to whether it could be considered a policy at all. It is a series of aims.

There is nothing wrong or reprehensible in Cheshire East aspiring for a sensible level of growth that takes into account the current economic circumstances and environmental capacity. However, nothing is said about environmental capacity either in this policy or anywhere else and, interestingly, although the word ‘sustainable’ is used very liberally – indeed gratuitously - in other parts of the document, it is not used at all within the actual ‘policy’ either in the heading or the text.

Bearing in mind the transparency issues that exists around the Local Enterprise Partnerships (LEPs), there is a deeply worrying reference to a ‘City’ (in para. 5.4 of the Pre-Submission Version/ para. 4.4 of the Submission Version) where it flags up the local LEP’s emerging Strategic Economic Plan (SEP). It says:

*“The emerging Cheshire and Warrington SEP includes a number of transformational projects in Cheshire East including **High Growth City** focusing on linking Crewe and Macclesfield by way of Congleton creating a ‘corridor of opportunity’”*

[N.B. Author’s highlighting]

The fact that the Local Plan flags up these aspiration on the part of the LEP could be interpreted as them supporting it. If these are the real aspirations, then the plans for so much road building including the SEMMMS roads and the Congleton Northern Relief Road, and for a Green Belt review begin to fall into place. (But are not supported).

What is not quite clear at the moment is whether the ‘corridor of opportunity’ is the M6 or the new series of roads proposed tied together by a series of other road ‘improvements’.

The long term philosophy appears to be heading towards a new strategic road system that bisects the northern and middle parts of the Borough and use it as a springboard to build a city in due course. (The remainder accommodated in future Local Plans). The ‘corridor of opportunity’ as the phrase above describes it could be interpreted as described below.

The ‘corridor’ would commence at two points immediately outside the north of the Borough. The SEMMMS A6 Stockport North-South Bypass would connect to the M60 at

Bredbury in Stockport while the SEMMMS A6 Manchester Airport Relief Road would connect to Manchester Airport and the M56. They would come together heading south via the new SEMMMS Poynton Relief Road (formerly the A523 Poynton Bypass and the A523 Poynton to Macclesfield Improvement) which would pass through Prestbury and connect to the existing Macclesfield Silk Road. The Silk Road allows circumnavigation of Macclesfield and would lead to the proposed new Macclesfield South West Distributor Road and thence, via a stretch of improved road, to the Congleton Northern Relief Road - with a further improved road terminating at junction 17 of the M6 at Sandbach.

There is already a new north-south (single carriageway) road between Sandbach and Crewe – the A534. Apparently, if the LEPs quoted statement is accurate, it sees these identified roads as forming the spine that would run through a new city!

New roads are permitted development in Green Belt but in order to accommodate both them and development which in many cases will facilitate their funding, the Green Belt (and the Green Gap) would be rolled back in several places. Paragraph 5.17 (of the Pre-Submission Version/ para. 4.17 of the Submission Version) says:

*“revisions to the Green Belt are necessary for towns such as Macclesfield to maintain their role and status - a departure from past policies of development constraint at any cost”.*

All the supporting text in this section is aimed at talking up the need for growth and it quotes the NPPF in paras. 5.12 and 5.18 (of the Pre-Submission Version/ paras. 4.12 and 4.18 of the Submission Version) in an attempt to bolster the case. Meanwhile paragraph 5.8 (in the Pre-Submission Version/ para. 4.8 in the Submission Version) warns that if the Borough does not provide what the Plan regards as ‘sufficient’ provision for housing commerce and employment:

*“economic growth will be constrained because new businesses will decide not to locate in Cheshire East”.*

There is an assumption (in par. 5.11 of the Pre-Submission Version/ para. 4.11 of the Submission Version) that more housing development *“generates increased retail expenditure in the local economy”* because this has historically been the case. However, the connection is no longer so direct and can no longer be assumed with the rise of Internet shopping and home deliveries. People now buy from the cheapest provider they can source on the Internet and this may not even be a UK business. Even food shopping may be picked up some distance away and/or be delivered directly by supermarket chains or by post from more distant suppliers.

## 6. STRATEGIC PRIORITIES

### Object

The third 'Strategic Priority listed at the outset of this section in para. 6.1 is very welcome, ie. *'Protecting and enhancing environmental quality'*. The fourth one would be as well if it was thought that the last part, *'improving the road network'* was about better maintenance of roads (which is always a priority for the public when they are canvassed) but it is quite apparent from this plan that *'improving'* means significantly adding to.

The other aspects of the fourth priority are genuinely sustainable aspirations – *'reducing the need to travel, managing car use and promoting more sustainable modes of transport'* but the question has to be asked, how would building the volume of extra highway capacity that is proposed 'reduce the need to travel'?

Re. the policy that supports 'Strategic Priority 1', **'Promoting economic prosperity by creating conditions for business growth'**, there needs to be a commitment not to over allocate employment land.

The first commitment is to provide *"a viable and flexible supply of quality employment land and premises"* but there is no recognition, either in the policy or the supporting text, that currently too much employment land is being held. (N.B. The Regional Spatial Strategy panel told Cheshire in 2007 to release employment land for housing and other purposes because it was holding 28 years' worth – an amount which would take it beyond the period of the Local Plan). If some of the currently-held employment land is no longer considered suitable, it should be re-allocated before new greenfield sites are earmarked. (A recent example of good practice was when CEC recently agreed to release for housing purposes employment land at Tytherington which had been unsuccessfully marketed for 15 years).

The second commitment is for better marketing of retail centres and the third is about enhancing the retail offer in the major towns. However, neither of these factors will make IT savvy shoppers spend more in retail centres. They may go out to view the goods, but they are returning home to purchase them cheaper on line. The principal authority should accept this fact and change its commitment to one which consolidates / shrinks existing centres and gives over the failing peripheral areas to housing.

The fourth, sixth, seventh and eighth commitments are supported. The fifth is too much of a mixed bag to support. It begins by expressing, in a somewhat obtuse manner, support for the SEMMMS roads (*"improved transport links to the Manchester City Region and Manchester Airport"*). It is also a confusing statement because the Regional Spatial Strategy included Cheshire East in the Manchester City Region. Is it not any longer?

Also, part of the fifth commitment is a generic declaration of support for all *"improved"* transport infrastructure although the example given is a rail one. And the final commitment is based on the assumption that there would be economic benefits from HS2 even though there would not be an HS2 station at Crewe and the hybrid trains that would run from it

southwards onto the HS2 track would run much slower than the HS2 trains. The taking up of train paths by these 'classic compatible' trains would in fact be an issue for residents in our Parish who currently have the option of catching London-bound trains at either Macclesfield or Wilmslow. According to analyses of the proposals, Wilmslow would lose all its London-bound trains and Macclesfield would suffer a reduction.

Strategic Priority 3 is supported in toto but it would benefit from the addition of a 10<sup>th</sup> point and that is one which resolves to take cognisance of environmental capacity, productive agricultural land and the ability to provide local food for local markets.

Strategic Priority 4 is deceptive. Commitment no. 1 speaks of "*building homes that are close or easily accessible to where people shop, access services and enjoy recreational activities*". Superficially this is a sound statement. But the fact of the matter is that the evolving Local Plan envisages building large and entirely new, self-contained settlements in Green Belt at Handforth and (after the period of the Plan) at Henbury and Gawsforth and also providing new employment and residential areas alongside each other in open countryside to the north of Congleton along the proposed new Congleton Northern Relief Road. Plans of this scale will have impacts on the rest of the Borough and particularly on communities within a wider area of influence.

Point no. 2 also reads well except that it appears to relate only to new development and not to existing built areas.

Commitments numbers 3 and 4 are only about "*supporting*" and "*encouraging*" better provision for the mobility impaired and sustainable transport, not about delivering either, and 5 and 8 appear to be making the same open-ended commitment to providing transport infrastructure which, it can be taken to mean, is road infrastructure as commitment no. 7 specifically commits to investing in more passenger transport infrastructure. And while commitment no. 6 is welcome, one to "*enhance the role of key railway stations*" [author's underlining] and Crewe in particular, this is not the same thing as making a policy to invest in improving railway stations and access to them.

## **7. PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT**

### **Object**

In the supporting text to the policy in this section, paragraph 7.4 (in the Pre-Submission Version/ para. 7.5 in the Submission Version) states that the pro-growth strategy "*seeks to deliver the amount of development required in the Borough up to 2030 in a sustainable way*". We would question how such levels of growth and such large allocations of previously undeveloped land could possibly be described as "*sustainable*"?

**Policy MP1**, particularly commitment number 1, is all but a developer's charter. As a balance to it, it should contain a commitment to give weight to Supplementary Planning Documents, particularly those which have emerged from community effort.



In the supporting text there needs to be a commitment to carry forward all those SPDs (Village Design Statement etc) that are current and relevant and only require modest updating of references. There also needs to be a promise to support both the production of new SPDs by local communities and also the content of them once they are adopted.

## 8. PLANNING FOR GROWTH

### Object

**Policy PG1 on 'Overall Development Strategy'** should be strongly resisted. It is far too ambitious to the point of being environmentally destructive. How, when there is surplus of employment land allocations and employment premises are standing empty, (see our response to 'Strategic Priorities') can there be a justification for taking 300 hectares of land and how, when Cheshire East has failed to meet its current housing targets, can it possibly expect to build 27,000 homes between 2010 and 2030? There would appear to be a serious lack of realism in the plans.

The justification for the employment land figures is the Employment Land Review but this does not justify this level of growth. Having failed to find the arguments for sufficient land, it simply added on another 30% in order to provide some flexibility. Meanwhile, the land identified in the latest SHLAA is being quoted as an appropriate evidence base for where housing might go, despite the fact that this came forward with many new Green Belt and greenfield sites which are challengeable and which currently have no planning permissions.

N.B. A 'High Growth City' initiative is referred to a second time in the 'Principal Towns' section (para. 8.23 of the Pre-Submission Version/ para. 8.25 of the Submission Version), although here it is only mentioned in relation to Crewe.

As well as the principal towns and the key service centres, some growth is also foreseen for all 13 of the local service centres, regardless of their setting or rurality and the statement is made as part of the 'Vision' for the LSCs "*This may require small scale alterations to the Green Belt in some circumstances*". But the main document fails to refer across to the 'Green Belt Assessment' document or to the 'New Green Belt and Strategic Open Gap Study' from which it is actually possible to discern where Cheshire East is thinking of rolling back the Green Belt in and around the smaller centres. Because of this, the majority of people looking at the Pre-Submission Core Strategy main document would not realise that this information is available and that now is the time they need to be studying those more detailed background documents and commenting on them.

**Policy PG 2 on the 'Settlement Hierarchy'** leaves a lot open to interpretation. No formulae are applied to permissible development in the different centres. For instance, what is meant by "*small scale development to meet localised objectively assessed needs and priorities*"? This, apparently, will be supported by the principal authority in respect of the

local service centres. Is the interpretation of this to be left to clever lawyers working on behalf of developers?

Quite separately from its 'settlement hierarchy' the document seeks to justify the "*new North Cheshire Growth Village at Handforth East*" (paras. 8.33 & 8.34 of the Pre-Submission Version/ para. 8.35 of the Submission Version). However, it immediately diminishes its own case for this in its succeeding section on Green Belt where it acknowledges the purposes of Green Belt. If Cheshire East accepts, as it says it does, the NPPF's definition of Green Belt and what it stands for, how can it justify a new settlement on a particularly fragile strip of Green Belt which would effectively close up the Green Belt divide between Cheshire East and Greater Manchester?

Sections 3 v and 3 vi and all parts of section 5 of the **Policy PG 3 on 'Green Belt'** are not supported and neither is section 6 because it is too vague and it lacks transparency. The remainder of the policy is supported.

Regarding **Policy PG4 on 'Safeguarded Land'**. There is clearly going to need to be some clarification over this issue. Despite what the NPPF says, the Planning Minister, Nick Boles, has effectively declared that there is no requirement to set aside safeguarded land beyond a 20 year period and stated that anyone who says differently is "wrong". This statement by the Planning Minister appears to effectively dismiss this entire policy and its justification.

**Policy PG 5 on 'Open Countryside'** is broadly supported but the fact that it is left open to be finally defined after site allocations have been made is very poor practice. The same 'line' is taken in respect of the Green Belt policy. This is simply not good enough.

No part of **Policy PG 6 on 'Spatial Distribution of Development'** is supported. The numbers of houses and the volume of land proposed for employment are far too high and, despite what the Plan claims, they are totally unsustainable.

The Key Diagram does not illustrate the west-east SEMMMS A6 to Manchester Airport Road, the planning application for which has now been lodged. Also, although the Macclesfield South West Distributor Road was not originally classified as a strategic road, it would in fact become one if all the road building aspirations of the principal authority become a reality. Apart from this road, there is an improved road proposed between it and the Congleton Northern Relief Road which is envisaged in the 'East Cheshire, Engine of the North' document that was approved by the CEC cabinet. (Refer back to the 'Case for Growth', para. 5.4 of the Pre-Submission Version/ para. 4.4 of the Submission Version, and the tabling of a 'High Growth City' and 'corridor of opportunity'). It is important not to lose sight of this, even if some of it is longer term – beyond the period of the current Local Plan. These plans by the LEP, which the principal authority clearly supports, need to be both spelt out and illustrated on the key diagram.

## 9. PLANNING FOR SUSTAINABLE DEVELOPMENT

### Object

**Policy SD 1 on 'Sustainable Development'** can largely be supported in as far as it goes but it does not go anywhere near far enough.

Cheshire East Council under Councillor Wesley FitzGerald's leadership signed up to certain carbon reduction commitments. The resolution in the Local Plan to reduce carbon emissions (provision no.11) needs expanding to include behavioural change (making it easier to travel less or use public transport).

Also missing from the policy is a wider commitment to reduce all greenhouse gas and other harmful emissions by whatever means possible and statements about not building on flood plains, working within environmental constraints, respecting tranquillity and dark skies and reducing light and noise pollution.

**Policy SD2 on 'Sustainable Development Principles'** is supported but this also needs to reflect the additional points made in relation to the previous policy and also to promote the sequential use of land (brownfield first).

## 10. INFRASTRUCTURE

### Comment

**Policy IN 1 on 'Infrastructure'** appears to be supportable in general terms but it would be helpful if **Policy IN 2 on 'Developer Contributions'**, which is otherwise supported, included a specific reference to waste water and surface water infrastructure and the need for new developments to include paved footways.

## 11. ENTERPRISE AND GROWTH

### Object

Paragraph 11.2 refers to the document 'East Cheshire, Engine of the North' document. It is important to highlight this was not the result of any wider stakeholder or public consultation. This document was produced for and approved by the CEC Cabinet who, at the same time, approved the establishment of a private enterprise company to push through the agenda laid out in this document. This document contains many of the infrastructure proposals highlighted in the Local Plan and says it commits to delivering them.

The green box part of paragraph 11.3 expands a little on the concept of a *‘Crewe High Growth City/ M6 Corridor growth proposition for the south of the Borough’*. This is confusing because the description of the LEP aspiration (in para. 5.4 of the Pre-Submission Version/ par. 4.4. of the Submission Version) is definitely for *“a High Growth City focusing on linking Crewe and Macclesfield by way of Congleton”*. This could not be done using the M6 corridor as implied here.

Interestingly, para. 11.6 does bring Congleton back into the equation if not Macclesfield - but precisely what is envisaged is not clear. The lack of clarity for what is obviously a key aspiration is unforgivable.

Similarly, the vision for a ‘North Cheshire Science Corridor’ appears to be substantive but it again lacks specificity - and is it more hope than reality? The figures quoted for the number of jobs in this field appear to apply to before Astra Zeneca announced it was transferring its R & D facilities to Cambridge.

**Policy EG 1 on ‘Economic Prosperity’** is not supported, particularly not the second part which would leave the siting of future employment sites wide open to debate.

**Policy EG 2 on the ‘Rural Economy’** is also far too vague and open to wide interpretation and therefore not supported. There is nothing about the scale of development or environmental capacity.

**Policy EG 3 on ‘Existing and Allocated Employment Sites’** could make it easier than it is doing to reallocate land currently designated for employment use for other purposes. N.B. The Astra Zeneca site is an enormous one. Although it is in Green Belt and well landscaped, it is a vast previously-developed area and it is close to the southern end of the Alderley Edge Bypass. Part of the site could easily be considered for housing. It states in bullet one that a master plan for the site will be developed over the next 12 months. This could and should create a multi-purpose site.

In view of the massive development proposals for North Congleton it is worth noting that **Policy EG 4 on ‘Tourism’** again cites Jodrell Bank as a key attraction. But the main defective point to recognise here is that, despite a brief mention of landscape assets in the supporting text (para. 11.3) no credence whatsoever is given within the policy itself to the role that the countryside plays in attracting tourists. Also, the policy includes a ‘get out’ clause in terms of where tourist attractions can be sited which is designed specifically to capture the ‘BeWilderwood’ development proposed for Tatton Park (ie. 3c). This provision should be dropped and, in its place, there should be a statement about the need to protect historic parks from development.

The bulk of **Policy EG 5, ‘Promoting a Town Centre First Approach to Retail and Commerce’**, can be supported but not the latter part of point no. 7 which is a ‘get out’

clause for all that comes before. Also, it would be useful and advisable to have in the policy a provision for reducing the size of town centres where this is clearly the most sensible thing to do due and for giving over failing peripheral retail areas to housing and other uses.

## 12. STRONGER COMMUNITIES

### Object

**Policy SC1, 'Leisure and Recreation'**, is once again (in common with policies EC 4 and EG 5 commented on immediately above) something of a 'catch all' policy in terms of allowing future development and it does not make a promise to ensure there is no net loss of leisure and recreation facilities. Bearing in mind the predicted increase in population, this is a major omission. Similarly, Policy SC2 on 'Outdoor Sports Facilities' fails to state that overall provision will not be reduced.

**Policy SC3 on 'Health and Wellbeing'** sees health in terms of health care and fitness. It fails to recognise the need for good air quality to preserve good health. There should be background data about AQMAs and the number of respiratory problems, followed up by a policy commitment to improve air quality and reduce respiratory illness. It also needs to be recognised that traffic is a major contributor to poor air quality.

The thrust of **Policy SC4 on 'Residential Mix'** can be supported but it is wrong to declaim that bungalows are the answer to providing for older residents. Bungalows are very land hungry and, like all individual properties, require a lot of upkeep. Well designed apartments serviced by lifts are often better suited to older residents who pay a service charge to ensure that maintenance issues and security are dealt with centrally and they have the potential to offer a variety of communal facilities all under one roof. They are far more sustainable than separate units, each with their own footprint and each requiring their own up-keep.

Re. **Policy SC 5 on 'Affordable Homes'**, this is yet another instance of where the bulk of the policy is good but developers are provided with an escape clause at the end, ie. they can make a financial contribution in lieu of on-site provision (clause 8).

**Policy SC6 on 'Rural Exceptions Housing for Local Needs'** is supported and so is **Policy SC 7 on 'Gypsies and Travellers and Travelling Showpeople'** but the latter should include a statement that the local authority will not endorse the laying of hard foundations or the provision of other infrastructure or services for which there is no planning permission.

### 13. SUSTAINABLE ENVIRONMENT

#### Object

**Policy SE 1 on 'Design'** is supportable in as far as it goes. It is strong in generic statements on character and design but it says nothing about Village Design Statements or about 'mass' and, unlike the policy on affordable homes, it does not require that all new homes built should achieve the Code for Sustainable Homes Level 3. It is essential to set these environmental standards across the whole range of new-build homes if there is to be a serious attempt to secure sustainable homes and a sustainable environment as claimed.

Also, a commitment to merely encourage sustainable construction practices (2iv) is not good enough. The principal authority should produce a Supplementary Planning Document (SPD) which requires that all builders on all construction sites comply with the Sustainable Contractors Code. This is a point which was strongly supported by our Parish Plan process.

**Policy SE 2 on the 'Efficient Use of Land'** is totally inadequate. It is nowhere near adequate for the principal authority to simply 'encourage' the redevelopment of previously developed land. This means absolutely nothing. The area that now constitutes Cheshire East, made up of the former Macclesfield, Congleton and Crewe & Nantwich Districts, was previously meeting the Regional Spatial Strategy targets for brownfield development. Across those three Districts, this averaged 73%. Now it merely proposes to 'encourage' the redevelopment of previously developed land.

Where, we would enquire, is it possible to find, in the current main or supporting documents, figures setting out the percentage of previously developed land identified for new development in the current Plan?

**Policy SE 3 on 'Biodiversity and Geodiversity'** commits to protect nationally designated sites and areas but allows for debates about sites of less importance and offers to be made by developers, eg. in relation to the re-location of protected species. In the supporting text, (para. 13.23 in the Pre-Submission Version/ para. 13.25 in the Submission Version) reveals that Sites of Biological Importance are in the process of being re-surveyed and, as a result, some will be designated as 'Local Wildlife Sites' and others will have their protective designations dropped. Should not this exercise have been completed before the Local Plan reached this stage?

**Policy SE 4 on 'The Landscape'** erroneously gives the impression that there is more landscape protection than there is. Outside of the Borough's north eastern fringe area, which falls within the Peak District National Park, there are no areas with national landscape designations anywhere in Cheshire East (or Cheshire West and Chester). This being the case, Cheshire County Council established its own local designation of Areas of Special County Value (ASCVs) some time ago and this has been a recognised factor in planning

decisions until now. These have been scrapped and Cheshire East's approach is to be a weaker one which will provide less protection and reassurance against inappropriate development at a time when the principal authority is seeking a record level of growth. How can this approach be considered to be 'sustainable'?

Paragraph 13.27 (in the Pre-Submission Version/ para. 13.29 in the Submission Version) is a useful one but it is merely a phrase in the supporting text. It should be a part of the policy. It says:

*"The Cheshire East area is a significant landscape asset in the North West which is enjoyed and valued for, amongst other things, its ecological, recreational, agricultural, conservation and aesthetic aspects".*

**Policy SE 5 on 'Hedgerows and Woodland'** is sorely deficient because it only supports maintaining that which exists at present. There is no reference to the fact that tree cover in Cheshire is a mere 4%, against a national average of 11%. This being the case, the policy should commit to increase tree cover and establish some new woodlands.

There should also be definitive commitments to protect ancient hedgerows and to plant new ones.

**Policy SE 6 on 'Green Infrastructure'** would be improved if there was a specific commitment to provide greenways between and through settlements for walkers, cyclists and horseriders, whether this be by the principal authority or by developers. A re-write of point no. 4 vii could achieve this.

### **Historic Environment**

The section on the 'Historic Environment' opens with the statement:

*"Our historic environment is a finite resource and an integral part of the unique character and distinctiveness of Cheshire East"*

(para. 13.51 in the Pre-Submission Version/ para. 13.55 in the Submission Version)

It is indeed. If only this Plan recognised that the same is true of the wider countryside.

**Policy SE 7 on 'The Historic Environment'** is supported but should also commit to protecting sites of archaeological importance. There are passing references in the supporting text to undesignated heritage assets (in para. 13.59 of the Pre-Submission Version/ para. 13.62 of the Submission Version) and to archaeological resources (in para. 3.60 of the Pre-Submission Version/ par. 13.63 of the Submission Version) but that is all. The protection of sites of archaeological importance is an issue that should be valued higher. It should appear in the policy itself.

The acknowledgement by the principal authority that climate change is a major issue which has to be tackled are very welcome (paras. 13.67 – 13.69 of the Pre-Submission Version, inc. and paras. 13.71 – 13.73 of the Submission Version), as is the reference to the Climate Change Act (para. 13.70 of the Pre-Submission Version/para. 13.74 of the Submission Version).

Policy SE 8 on ‘Renewable and Low Carbon Energy’ is supported and so particularly are the references to combined heat and power, anaerobic digestion, hydropower, heat pumps and geothermal heat and resources.

**Policy SE 9 on ‘Energy Efficient Development’** appears to be supportable.

Similarly, **Policy SE 10 on ‘Sustainable Provision of Minerals’** appears to be supportable.

The reference to the waste hierarchy in **Policy SE 11 on the ‘Sustainable Management of Waste’** is good. Ideally, if there are to be any new sites designated to the management of waste, they should have been identified in this Plan. However, it is noted that the principal authority is not proposing to come forward with a Waste Development Plan until after the publication of a national waste planning policy.

**Policy SE 12 on ‘Pollution and Unstable Land’** is inadequate because it makes no mention of the air pollution related to road travel and air travel. Transport is responsible for a quarter of carbon emissions, hence reducing the need to travel is key. References to noise and light pollution (in supporting paragraphs 13.119 to 13.121 of the Pre-Submission Version and paras. 13.126 to 13.128 inc. of the Submission Version) are welcome but there should be something about noise and light pollution in the policy itself, as there should be something about tranquillity.

**Policy SE 13 on ‘Flood Risk and Water Management’** is supported but, as well as requiring that there is sufficient water capacity infrastructure, it should also require that there is simply sufficient water available to supply the level of growth which this Plan envisages. It is worth noting that, at the examination in public into the last RSS, the Environment Agency expressed concern about water capacity in relation to the high housing figures that were discussed. Cheshire East is proposing higher housing figures than the RSS recommended and also a very significant increase in employment land and yet it is so far not proposing to say anything in its emerging Local Plan about ensuring there is sufficient environmental capacity for its aspirations.

**Policy SE 15, the ‘Peak District National Park Fringe’**, is welcome but commitments in it are modest.



## 14. CONNECTIVITY

### Object

The introduction to this section acknowledges that the NPPF “*seeks to reduce car use*” (para. 14.1) but then goes on to try and argue why more transport infrastructure (ie. roads) should be built in the following paragraphs.

**Policy CO1 on ‘Sustainable Travel and Transport’** is supportable although the addition of a specific commitment to introduce more ‘safe routes to school’ would be well received.

But, it has to be said, that this policy is counter-manded by **Policy CO2, ‘Enabling Business Growth Through Transport Infrastructure’** which is not supported. This proceeds to list all the roads that the principal authority has aspirations to deliver including several for which no business case yet exists such as “(b) the Poynton Relief Road and improvement to the A523 corridor” and “(e) Congleton Northern Link Road”. These are schemes which have been flagged up first, and put into the Plan, and for which evidence is now being prepared. This modus operandi is contrary to that set out in the DfT transport appraisal process.

The Poynton Relief Road and A523 ‘improvements’ to the south of it would run entirely through Green Belt and the Congleton Northern Relief Road and the land it captures for development would be totally within the Jodrell Bank exclusion Zone and likely to affect the workings of the telescopes which receive much recognition elsewhere in the Plan. Building these roads would not be sustainable and would certainly not achieve the modal shift that Policy CO1 purports to aim for.

The evidence now exists that building new roads is only ever a short term solution. Seminal reports by SACTRA - the Standing Advisory Committee on Trunk Road Assessment - in the 1990s were accepted by government. They proved that providing more highway infrastructure generates new traffic movements (Trunk Roads and the Generation of Traffic) and they showed that, in a mature economy such as that which exists in the UK, there is no automatic connection between new transport infrastructure and economic benefit (Transport & the Economy).

**Policy CO3, ‘Digital Connections’** is supported in terms of the capacity it seeks but there needs to be a requirement that masts are not only “*appropriately located and kept to a minimum*” but camouflaged whenever necessary.

**Policy CO4 requiring on ‘Travel Plans and Travel Assessments’** is supported but there needs to be a commitment on the part of the principal authority to monitor travel plans.

## 15. CORE STRATEGY AND STRATEGIC LOCATIONS

### Object

The principal authority accepts in para. 15.11 that all the strategic sites it is putting forward may not materialise but argues that is necessary to “*be flexible and build in contingency*”. This is not good enough when they seek to allocate so many large areas for development and when so many of them are on Green Belt or greenfields. Land is a finite resource. It should not be allocated for development if a case has not been proved for it.

### STRATEGIC SITES MOST LIKELY TO HAVE SOME IMPACT ON PRESTBURY (due to proposed new roads/ induced traffic &/or development corridors &/or the effects of urban sprawl)

#### MACCLESFIELD

**SL 4: Central Macclesfield.** Provision 16 of this policy about “*Improved strategic highways links towards the north and Manchester of the A523 corridor including the Poynton Relief Road*” is contradictory to some policies about sustainability and is not supported.

Also not supported is the Wilson Bowden development identified in (b) under ‘Site Specific Principles of Development’.

**Site CS 8: South Macclesfield Development Area.** This development area is already allocated and therefore accepted but the “*Delivery of a Link Road between Congleton Road and London Road*” (under ‘Site Specific Principles of Development’) is not endorsed. The South West Distributor Road could form part of a strategic route between South East Manchester and the M6 which would pass through Prestbury.

**CS10: Land between Congleton Road and Chelford Road.** This Green Belt agricultural land which is in the Jodrell Bank exclusion zone came forward for potential development during the last Macclesfield Local Plan process. It was strongly opposed and it was rejected then by the planning inspector who sat in judgement at the EiP. The proposal to remove it from Green Belt, provide 150 houses and five ha. of employment land now and safeguard the remainder for substantial development during the next Local Plan period should be withdrawn. The Henbury side of this development is close to the southern boundary of Prestbury Parish and a very large new settlement here would have impacts on Prestbury. However, a case has not been proven for it.

## CONGLETON

Five strategic sites - **SL 6: Back Lane, Radnor Park; SL 7: Congleton Business Park Extension; CS 18: Giantswood Lane South, SL 8: Giantswood Lane to Manchester Road and CS 17: Manchester Road to Macclesfield Road.** All of these proposed development sites are on high quality agricultural land in a rural part of the Borough, following on one from the other and created as a result of the proposition to build the Congleton Northern Relief Road. (Their creation is seen as a means of providing developer funding for the road). Much of the area is in the Jodrell Bank Exclusion Zone. This entire proposal, along with the road, is aspirational, lacks sufficient justification and should be strongly opposed. If these sites and the Congleton Northern Relief Road they would enable went ahead, along with the SEMMMS roads, then long distance strategic traffic would be drawn through Prestbury.

**CS 29: Alderley Park Opportunity Site.** This site should not only be viewed as being suitable for employment purposes. It is a previously developed site in Green Belt that now resides at the southern end of the newly-built Alderley Edge Bypass. It has a significant potential to take up genuine development needs of all types and should partially be utilised for housing.

**CS 30: North Cheshire Growth Village, Handforth East.** This proposal, all on Green Belt land, would close up the Green Belt between Greater Manchester and Cheshire East. This proposal, combined with the proposals for the two new SEMMMS roads, has the potential to allow urban sprawl and permit the Greater Manchester conurbation to extend into North East Cheshire. We cannot therefore support it.

## **SAFEGUARDED LAND**

We strongly object to the principle of safeguarding large tracts of (mainly Green Belt) land for specific allocation in a future Local Plan and note that the planning minister does not endorse this.