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19th November 2014

Dear Sirs,

Planning Application 14/4451C – Land off Manchester Road, Congleton

This is the response from the Congleton Sustainability Group to Planning Application 14/4451C. We generally support the principle of development of this site as it forms part of Site CS 17 - Manchester Road to Macclesfield Road, Congleton as identified in the draft Cheshire East Local Plan. While accepting that the applicant has addressed some of the sustainability issues associated with the site we believe the applicant has failed to fully address these and other issues resulting in a development with significant sub-optimal sustainability.

We as a group wish to see the highest standards of sustainable development for Congleton. We are very disappointed by the developer's over-simplistic approach to sustainability set out in their proposals, i.e. they appear to consider that sustainable development is simply a matter of providing energy efficient dwellings with, in this case, an area of public open space and then relying wholly on the existing services and infrastructure of the area to meet all other sustainability requirements, all of which we consider to be inadequate to service a development of this size and location, which currently is as an isolated edge of town site. We consider that if this site is built out in the near future in advance of and without the adequate additional local services identified in the CEBC Local Plan, particular within CEBC Local Plan Site SL 6 then patterns of unsustainable living and travel will be established which will be very difficult, if not impossible to change. We believe this approach to sustainability to be wholly inadequate.

Notwithstanding this, our view is that the shortcomings of this development can be readily addressed, some at no cost and others at minimal cost, resulting in very little additional cost to the development as a whole. However to achieve this we ask that you **reject the current plans** put forward by the applicant and ask that they redesign their development to address the issues we raise below which are required to significantly improve the quality, safety and sustainability of the development.

Our specific concerns with the proposals for this development are as follows:

1. Public Consultation

We believe that the level of public consultation carried out by the applicant is wholly inadequate and consequently fails to comply with the spirit of the NPPF in this regard (paragraphs 188 et seq.).

While Section 5 of the Application Form states that pre-application advice was sought from CEBC, paragraph 1.8 of the Statement on Community Involvement states there was no such consultation. If the latter is the case we are extremely disappointed with this; it is our opinion that many of the issues we raise with this application could and should have been resolved during such discussions.

Notwithstanding this, we consider the applicant's public consultation exercise, consisting as it did of simply distributing 25 questionnaires to local residents and businesses is also wholly inadequate.

In asking you to refuse the current proposals from this applicant we request that the first stage in addressing key issues with this development is for the applicant to hold a new public consultation including meaningful discussions with CEBC and engagement with a wide range of Congleton residents and resident groups.

In this regard we would point out the Congleton Sustainability Group and the Congleton Cycling Campaign successfully worked with the landowners of the adjoining developments (13/0918C and 13/0922C) to bring National Cycle Route 55 through the development thus significantly improving the sustainability of both of these. We also encouraged the landowners of these sites to include allotments, which we consider are an important part of sustainability as well as contributing to the health and wellbeing of residents.

2. The development must conform to a masterplan for north and west Congleton

This development, both this phase 1 and the adjoining phase 2 (14/4452C), are the latest developments to come forward in the north and west of Congleton since the adoption by CEBC of the Congleton Town Strategy. In our response to the CEBC Draft Local Plan we requested that all development in this area should conform to a masterplan to ensure all development meets the overall vision and plan for the area and not in a piecemeal uncoordinated manner.

Phase 1 and 2 of this current development are the third and fourth developments to come forward in this area and we are disappointed that CEBC have not yet have produced a masterplan for this area. This piecemeal approach to development has resulted in a series of uncoordinated isolated edge of town sites with very limited permeability between them and the existing development, which leads to significant elements of unsustainability and community severance.

3. Concerns over the accesses off Manchester Road

We welcome the proposal to extend the 30mph speed limit beyond the northern access to the development and the adoption of DMRB standards for visibility. We urge CEBC to accept both of these proposals.

We are nonetheless very concerned over the proposals for the northern access to the site which is very close to the proposed roundabout junction of the Congleton Link Road with Manchester Road. In our opinion a residential access road this close to a major roundabout is unsafe, particularly right turns in and out of the development will conflict with traffic either exiting or approaching the roundabout. We ask that CEBC Highways check the applicant's proposals in this regard and assure themselves of the safety of the developer's proposals, particularly in relation to the proposed roundabout.

We are also concerned about the safety of the combined impact of all the new accesses proposed off Manchester Road by all four current planned developments. This will result in four new accesses in close succession and, although each will have segregated right turn lanes (ghost islands), the poor standard of the alignment of Manchester Road with its limited forward visibility could result in a significant increased safety risk. Again we ask that CEBC Highways satisfy themselves that all the proposed new accesses in combination are safe.

4. The applicant's sustainable travel proposals need to be enhanced

While accepting that there is good connectivity and permeability for walking and cycling within the site itself this cannot be said of sustainable travel beyond the site.

Being an edge of town site the current provision for sustainable travel is very weak and we are very disappointed that the applicant has not proposed any improvements to this provision; rather they depend wholly on the current totally inadequate provision – this is completely unacceptable and needs to be addressed as a matter of urgency if the level of trips by sustainable modes predicted at paragraph 5.4 of the Transport Assessment is to be achieved. In our opinion, without such significant improvements the predicted level of trips by sustainable modes will simply not materialise and, as a consequence, the number of car based trips will be significantly greater than predicted.

As noted above we have already worked with the landowners of the adjoining developments to significantly improve the provision for sustainable development and travel. We are willing to do so again with this particular developer.

Our particular concerns are as follows:

- a) Lack of permeability with the adjoining developments (13/0918C and 13/0922C)

There appears to be no permeability with the adjoining developments; as noted above, these developments have high levels of connectivity for walking and cycling, which together with the existing signalised crossing of Macclesfield Road and a proposed signalised crossing of Manchester Road provides safe links to local services, including Eaton Bank School and further afield.

We would want to see walking and cycling routes through to these developments and their links as a means of addressing other serious constraints as set out below:

b) Lack of safe walking routes from the development to local services

Notwithstanding the possibility of providing safe off main road walking routes through the adjoining developments the alternative is to use the existing footways along both Manchester Road and Macclesfield Road.

In both cases the footways are on the opposite side of each road from the development requiring pedestrians to cross both of these busy roads to access them. There appears to be no proposals from the developer to provide safe crossing of either road to access these footways.

Furthermore, both footways are narrow and unsuited to carrying the numbers of pedestrians predicted in the Transport Assessment.

c) Lack of safe cycling routes

Similarly, notwithstanding the possibility of providing safe off main road cycling routes through the adjoining developments the alternative is to use either Manchester Road and/or Macclesfield Road, both of which are busy roads and therefore a significant deterrent to all but the most confident cyclists.

d) Inadequate access to public transport

While recognising that the route 38 bus service passes close to the development, albeit it travels along Macclesfield Road rather than Manchester Road so it will never be that close to the development itself, we note that the nearest bus stops are within the gyratory system and are 675m and 710m from the centre of the site (paragraph 4.4.1 of the TA); we consider these to be too far from the development to encourage travel by public transport.

To address this, additional bus stops are needed on Macclesfield Road much closer and within a short walk of the development.

Regarding rail travel, there is no direct public transport access to the rail station; it requires 2 bus journeys and bus times currently do not co-ordinate with train times. This means that travel to the rail station will be either by cycle or car. In our opinion the cycling route will only be undertaken by the most confident of cyclists, which means most trips to the rail station will be by car.

In conclusion, by relying on the inadequate standards of the existing provision of sustainable travel the development is far from as sustainable as the applicant claims. There needs to be commitments from the developer to significantly improve access to and provision of sustainable travel modes if the predicted level of trips by such modes is to be realised.

5. The development must contain firm proposals to reduce its carbon footprint

We note that this application is for full planning consent however we consider there is insufficient detail on how the developer intends to reduce the carbon footprint of the development. All we can find in the submitted documentation is a brief reference at paragraph 3.02 of the Design and Access Statement to an 'energy efficient mix of housing types'. No details are given as to what is intended, for example, is this simple Building Regulations standards or a higher standard such as Code Level 3 or higher.

Again there is no commitment to renewable energy despite this being a key element of NPPF (particularly paragraph 97) and of the emerging CEBC Local Plan (particularly Policy SD2 item viii e). We welcome the developer's intent to provide, upon request, electric car charging points in the garages however we would want to see a similar commitment to provide solar panels upon request.

We note that a number of properties, but far from most, are orientated in a generally north-south direction. Such an orientation will increase solar gain thus saving energy. However, to be most effective the most frequently used living spaces need to face south. Furthermore, overshadowing can greatly affect solar gain. We ask that the developer reviews the layout of the site to ensure that solar gain is maximised and there is little if no overshadowing.

We note there is reference to sustainable drainage (SUDS) at paragraph 6.5 of the Flood Risk Assessment but note actual proposals to achieve this are still to be determined. Given that this application is for full planning permission we would have expected proposals to be more advanced with at least some indication of the form of sustainable drainage proposed.

Furthermore, CEBC and the developer should consider part of Phase 1 and/or 2 of this development as serviced plots for self-builders. There is much greater opportunity for self-build to include renewable energy and other energy saving measures; the record to date for the provision of renewable energy by major house builders is pitiful. The affordable houses could be delivered by a Registered Social Landlord such as Plus Dane, who is currently delivering their own developments to at least Code Level 3 standards. Consideration could also be given to initiatives such as the Cherwell District Council Build! © Project.

Finally, to improve the sustainability of the development and the health and wellbeing of the new residents we would want the developer to include allotments as part of the open space. This would accord with Policy SC3 item 7 of the emerging CEBC Local Plan and would additionally, assist with community cohesion.

6. Conclusion

For the reasons set out above we consider the proposals submitted by this developer are seriously flawed resulting in an isolated edge of town site with wholly inadequate connections to the adjoining planned developments and existing communities which will result in a less than optimal quality of life for the new residents. As a consequence we ask that you **reject the current plans**.

However, we believe the issues we have highlighted can be easily resolved and, as stated above, the starting point to address these issues is to require the developer to engage in a full consultation with CEBC, the residents of Congleton and the town's various community groups including the Congleton Sustainability Group. We believe the outcome of these consultations will result in a significant improvement in the quality, safety and sustainability of the proposals resulting in a development the applicant could be proud of.

Yours faithfully

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