

**To: Spatial Planning Team**  
**CEC Local Plan**  
**Westfields**  
**C/o Municipal Buildings**  
**Earle Street**  
**Crewe**  
**CW1 2BJ**

Dear Sir/Madam,

I would like to object to the Local Plan, specifically the removal of sites CS10, CS32, CS40 and CS41 from the greenbelt and the construction of a new major road across South West Macclesfield. These above sites should be deleted from the plan and the housing and employment land allocation be reduced for Macclesfield for the following reasons.

The government has a brownfield first policy to development. This plan is unsound as in both policy and site allocation it specifically targets greenbelt sites to stimulate developers into building more housing quickly. This is not consistent with NPPF or the previously submitted plan.

According to CEC figures, between April 1, 2009 and December 31st, 2015 planning permission was given for 4,921 houses in Macclesfield (the net figure is 4,294 houses, taking into account, houses to be demolished to make way for the developments). Between April 1 2010 and September 2015, only 608 houses were constructed. The rest are being 'Land Banked' with the full knowledge of the Council and Strategic Planning Committee, with developers sitting on planning permissions in order to claim they need Green Belt to satisfy Macclesfield's housing allocation. This makes the policy of the removal of Greenbelt around Macclesfield in the Local Plan unsound and unjustified.

The proposed development on greenbelt has not been objectively assessed or positively prepared as brownfield sites and windfall site figures have been largely ignored – brownfield sites have contributed an average of 123 houses per annum since 2010. Cheshire East Council figures propose only 35 houses per annum from brownfield and windfall sites in the plan period.

Ministerial advice states that unmet housing figures do not show the 'special and exceptional circumstances' required for the removal of greenbelt. Again the plan is not consistent with national planning policy.

The evidence base used to justify sites is unsound as it uses developer promotion as the main reason for selecting or rejecting a site. The choice of the above sites is not based on a proportionate evidence base and the most appropriate strategy when considered against the reasonable alternatives.

CS32, CS40 and CS41 make a 'Major Contribution' to the greenbelt by separating Macclesfield and Henbury like those that separate Macclesfield and Prestbury. ARUP has recommended that the boundary around Henbury Village be drawn as it is currently 'washed over' by the greenbelt. The Greenbelt Assessment should then be amended and the sites' status increased. CS32, CS40 and CS41 should be removed from the plan. Development on CS32 will be less than 100 meters from Henbury Village.

Irreplaceable Ancient Woodland at Cock Wood, a Site of Biological Importance, will be damaged by allocation of CS32 and CS 40. This wood was formed as the glaciers receded. The hedgerows that cross these sites are remnants of this wood and their presence can be seen on Tithe Maps from the 1800s. Medieval ridge and furrow patterns are visible in CS32 and the road that predates the turnpike road (Chelford Road) runs along CS40.

Brownfield and windfall housing contributions are significantly underestimated in the plan, meaning greenbelt sites are being taken for development where brownfield and windfall sites should be used. Since CEC's figures were produced, many new sites have become available and developable and 'screened out' sites have entered the planning system. These should be included in the plan.

Greenbelt development will halt brownfield and town centre development which is against national planning policy. The revised Local Plan removes 103 ha of Greenbelt land for designation as Safeguarded land which is saved for development after 2030, and will not be consulted on again with residents. Safeguarding huge swathes of land causes blight and uncertainty for residents both inside and adjacent to CS32. This disproportionately large site cannot be justified.

In the councils' evidence base, consultation figures from 2014 have been ignored and replaced by figures from 2012. In the 2014 consultation, 99.9% of people objected to losing greenbelt in South West Macclesfield. Over 3500 people signed a petition

objecting to the removal of Macclesfield greenbelt and a new major road for developers to access land to build on across South West Macclesfield. The road would have no strategic use. The Highways Authority decided this was not a strategic road and could not be justified. The road has been rejected on numerous occasions, including the previous consultation and submitted Plan on the basis that the road does not provide sufficient benefit both in terms of reduction of traffic congestion or economic benefit. The only conclusion that can be drawn is that the construction of this road is simply to allow developers to “infill” around the road on the Greenbelt. It was discounted from the plan in November at the resumption of the Inspectors Hearing Session by Mr Adrian Fisher, yet it reappears in the plan.

Macclesfield greenbelt site sizes are not shown clearly in the plan. Housing numbers are significantly underestimated for greenbelt sites and are therefore unjustified and incorrect making the plan unsound. The South West Macclesfield major new road is not shown on any plan maps although mentioned in writing, and the SMDA link road been deleted in the updated maps. This is misleading.

Housing allocations are disproportionately high for Macclesfield compared to Wilmslow, Knutsford and Poynton. This is against advice from the council’s own consultants AECOM. A maximum uplift of 500 houses was set for any settlement, yet Macclesfield received 750. Additionally, Wilmslow is nearly as large a settlement as Macclesfield, currently the number of people in Wilmslow is 50% of Macclesfield’s. On this basis Macclesfield is allocated 250% more housing than Wilmslow per head of population until 2030 using the council’s figures, 325% more using Save Macclesfield Green Belts’ figures. The housing allocation for Macclesfield should be reduced in line with Wilmslow’s so that it is proportionate to Macclesfield’s population size.

The Local Plan's employment growth figure has been almost doubled from 0.4% (same as Cheshire West's successful Local Plan figures) to 0.7%. As a direct result of this, the new houses needed, has increased from 27,00 to 36,000 across Cheshire East. This means that an average delivery rate of 1800 houses need to be built each year. The Inspector called this figure 'challenging'. However, the Local Plan proposes up to 3,200 homes built pa. to include the backlog of unbuilt housing quotas, over the next 8 years. As Cheshire East has never achieved an annual build rate of more that 1500 houses pa., even at it's peak and currently are achieving only 1069 pa. The Local plan is not deliverable and its policies can be challenged by developers.

There is a failure in the Local Plan to update key economic factors, such as the relocation of Astra Zeneca, one of Macclesfield Borough's largest employers, from it's Alderley Park Site to Cambridge, with the related large fall in employment, (including highly skilled labour). This will impact directly on the scale of need for such a large allocation of new housing in Macclesfield. Also, the £90 million Silk Street Town Centre Redevelopment, although now defunct, as reported publicly in May 2015, has not been removed from this new Local plan. This makes the plan unsound as economic evidence arrived at before before completing this latest Plan has not been amended or updated.

Villages that abut and use Macclesfield as a hub have NOT been included in the town’s development allocations, unlike those for Crewe. The development requirements for Macclesfield should be reduced to take this into account. Prestbury, Chelford and Bollington should also contribute to Macclesfield housing completions and commitment numbers.

The effects of the HS2 rail link on the plan have not been addressed. Crewe is set to benefit greatly from the HS2 rail link as it will become a hub for the North West. More allocation of housing and employment land should be in and around Crewe, not Macclesfield. Macclesfield’s housing and employment land allocation should be reduced, it will not benefit from HS2.

**Other comments:**

Signature \_\_\_\_\_

Date \_\_\_\_\_

Name & Address \_\_\_\_\_

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