

Appendix K Protect Congleton Civil Society Letter

Protect Congleton – Civic Society

Comments on Congleton Link Road Consultation Issued in January 2014

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1. Introduction

- 1.1. The following are the comments of the *Protect Congleton – Civic Society* on the Congleton Link Road Consultation that was issued for consultation in January 2014. If further information or clarification is required please email: protectcongleton@gmail.com.
- 1.2. It will be seen from the following comments that one of the significant flaws of this consultation is the continual lack of detail to support the need for a Link Road. For example, there are statements in the consultation documentation that the Link Road will “*help the local economy and create and secure jobs*”, yet there is no information on how the Link Road will achieve these objectives – a road in itself will not do this.
- 1.3. Has the Cheshire East Council carried out the required analysis and/or feasibility studies to show how such a road is “guaranteed” to achieve the job creation and boost the local economy? Claims such as this are just that, mere claims. Without the necessary material to back up the claims then the claims are meaningless. If Cheshire East Council does have such evidence then that is good news. However why has this information not been made available? It could be construed as, at the least, disrespectful to the community to withhold such information? The community is asked to support the building of 3,500 houses and the sacrifice of vast areas of green space around Congleton to help fund the Link Road. The least that Cheshire East Council could do is provide material that supports the need for this Link Road.
- 1.4. Without the details of why a Link road is required and the benefits it will provide to Congleton and its community this consultation process is deeply flawed.

2. Link Road Consultation Process and Documentation

- 2.1. It is understood that the consultation process is being led by Ringways Jacobs, a Highways Construction and Service company, which performs much of the highways service for Cheshire East Council. This is NOT to an impartial leader for this consultation. Why has an impartial organisation not been chosen to lead this consultation process?
- 2.2. The consultation process appears to be a flawed process. The online process merely asks people to “*choose a route*”; there is not an option to say “*No to the Link Road*” – how can this be a fair consultation?
- 2.3. The documentation provided is a set of PDF charts showing the routes and other information at a high level. It is even difficult to determine the precise routes to be taken with such high level documentation. There is no detailed information on such things as the financial breakdown of each route, how the road will be constructed in terms of things like crossing of existing roads, cycle ways and screening, a detailed analysis of the business benefits, there are no traffic flows on the A34 south to show why an A34 south connection is not desirable. It is not possible to understand the true value or otherwise of the Link Road proposals without such information and as such the consultation process is seriously flawed.

3. Link Road Routes

- 3.1. We note that the southern end of the Link Road still ceases at Sandbach Road, Congleton. Whilst it is understood that the southern link is to be to the M6 via Sandbach this ignores one of the principle routes for traffic, and in particular for business traffic. We note that the route to South Staffordshire from Sandbach Road, Congleton, via the M6 and the A500 route is 7 miles and 5 minutes longer than the direct route along the A34. This hardly seems a sustainable option and it would appear more likely that traffic from, and to, Stoke and north Staffs would either continue through the town or would access the Link Road either through the Wall Hill route or through Padgbury Lane. Neither of these roads are designed for heavy traffic. Wall Hill is single track at one point with houses lining the road at this point. Padgbury Lane is residential and is a route to school. We consider the lack of a southern connection to the A34 is a serious flaw with this proposal. Apart from an increased cost, why is a southern A34 connection for the Link Road continually ignored? What is the extra cost for providing a southern A34 connection?
- 3.2. An obvious comment that can be made on the Link Road routes is that all of them cut-through Cheshire East Council's Local Plan Strategic Sites proposed for Congleton. Surely it is impractical to consider routing the Link Road through any site? In effect, this would seem to discount at least one (red option) and probably two (green option as well) of the proposed routes. If the Link Road is routed through one or more Strategic Sites this would have unjustifiable consequences for things such as highway safety, noise pollution and air pollution for the residential developments that could have a Link Road a matter of a few metres away. If the Link Road is to be constructed it should be sited away from all the proposed Congleton Strategic Sites and also provide an "outer boundary" for the Cheshire East Council Local Plan's proposed housing development for Congleton. With this in mind the Blue option would seem preferable, although the northern edge of the Radnor Park Strategic site would need to be sited to be "inside" the Link Road route.
- 3.3. There are historic problems within Congleton town created by narrow roads and traffic over-load, we have not seen a plan to improve this for local traffic or to ensure that additional development to the north and west of the town will be able to access the town, except along the routes and through the "pinch points" that are already subject to unacceptable levels of congestion, pollution, noise and vibration. The Cheshire East Council Local Plan claims to promote increased use of Congleton town centre it is not clear how residents in the proposed Strategic Sites will access the town centre and we have concerns that the Link Road will encourage residents to look outwards, especially to Manchester and the wealthier areas to the north of the town for shopping, for work opportunities and for entertainment.
- 3.4. Further detail is required on the Link Road in order that Congleton residents are able to understand whether this is a realistic and valuable proposition for the town, such things as:
 - 3.4.1 The Link Road will generate lots of air pollution and noise pollution as well as cutting a swathe through open countryside. Traffic noise is expected to be a major problem especially as the Link Road may be close to the development sites and may even run through the development sites. What measures will be put into place to combat the air pollution and noise pollution? How will the Link Road be built such that it is sympathetic to the open countryside in which it lies (e.g. what mechanisms will be used to visually camouflage the road)?

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- 3.4.2 How will the Strategic Sites be connected to the Link Road, e.g. roundabout, traffic signals, a T Junction? Also it is not clear how the Link Road will cross other roads, e.g. Giantswood Lane. Will existing roads have bridges to go over the Link Road? There could be many connections to the Link Road, which could give rise to a very “stop-start” piece of road, especially at peak times. Has Cheshire East Council conducted a road survey/analysis for the traffic they anticipate will use the Link Road and is the Council confident that the stop-start nature of this road, especially at peak times, will satisfactorily cater for the required traffic flows?
- 3.4.3 There are residential as well as business sites and the close proximity of the residential dwellings to such a road is not desirable. What road safety measures will be put in place to ensure the safety of the near-by residents?
- 3.4.4 How will cyclists and pedestrians be catered for?
- 3.4.5 Has a study been carried out for the proposed route of the Link Road to ensure that areas of special interest and/or value will not be destroyed?
- 3.5. It is understood that a radically different proposal costing less than 15% of the proposed Link Road has been considered by Cheshire East Council. This scheme would have been a significant upgrade/improvement of the town’s existing infrastructure. Information on such a scheme has not been made available. The information should have been made available for public consultation and not “hidden” from the community.

4. Link Road Funding

- 4.1. It is understood that the Link Road is an essential part of the economic strategy of the Cheshire East Council’s Local Plan but we note that it will require considerable land sacrifice through open countryside that is of special importance and value to the people of Congleton. It is important, therefore that the economic value of this proposed road should be realisable. There does not appear to be a feasibility study associated with the Link Road and it is unclear whether the associated development would happen if the land or funding was unavailable. This area of uncertainty should be clarified
- 4.2. The Link Road will cost a minimum of £71 million. Responses to the following questions and observations, as a minimum, should be provided in order that the Link Road can be properly assessed:
 - 4.2.1 How confident is Cheshire East Council that the funds to build the Link Road can be obtained?
 - 4.2.2 Have all costs been taken into account? For example, traffic calming, pedestrian crossings, cycle ways, road screening etc.
 - 4.2.3 It is understood that developers on the Strategic Sites will need to contribute to the funding of the Link Road. On the surface, the developers’ contribution to the Link Road appears a good funding source. However, the reality is that developers will not let any additional development costs impact their profit so the Link Road funding costs will be passed onto the house purchaser. This means that, effectively, a house purchase tax will be introduced for some/all new house builds in Congleton.
 - 4.2.4 One of the main objectives for building the Link Road, we are informed, is to help stimulate new business. Will existing businesses, including landlords of empty business units, or the Business Parks be expected to contribute to the Link Road Funding? If so, what size of contribution will they be expected to make and how will the Council enforce this?

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- 4.2.5 Will all new businesses on the Strategic Sites contribute to the Link Road funding including all expansions of existing businesses (we assume that the funds will come from the developer of the business premises, who will need to pass on costs to the business/landlord)? If so, what size of contribution will they be expected to make?
- 4.2.6 Following on from the two points above, why should the house builds fund the Link Road? Should this not be predominately business funded? If there has to be funding from the house building this should be kept to the absolute minimum – is this proposed?
- 4.2.7 Will it only be the dwellings (houses and business premises) on the Strategic Sites that will help fund the Link Road? There are 600 other dwellings mentioned as Site Allocations of the Cheshire East Council Local Plan that are not situated on the Strategic Sites.
- 4.2.8 Will Cheshire East Council have a say in how the Link Road funding required from developers will be passed onto the house purchase prices? One of the concerns is that the price of affordable homes will be increased even further by these requirements. In essence how will the funding will be allocated amongst the various types of property? For example: Will it be a flat rate per property (probably unfair on the least expensive dwellings)? Will it be a percentage of the property price? Will it be some form of tiered rate (perhaps linked to the Council Band of the property)? Or will it be something else? We do not believe it is sufficient for the Council to respond that this will be left to the developers, the Council needs to be concerned with how this funding will impact the housing market.
- 4.2.9 When will the Link Road funding contributions start and for how long will they be in place? Many of the Strategic Sites have capacity to build further dwellings after 2030 so it is important to know when this funding contribution will cease.
- 4.2.10 Will all other types of development be required to contribute to the Link Road (e.g. schools, doctors, nurseries etc.)?
- 4.2.11 There has been mention of a cost of £10,000 per house for the Link Road funding. This is not an insignificant amount and, as mentioned above, the developer will need to pass this amount (or as much as possible) onto the purchaser. This would imply that the funding will increase the cost of the new housing proposed for Congleton. Taken to its extreme this could cause property prices in all/most areas of Congleton to increase. Although this impacts all residents it would seem to impact especially the lower income residents and will make it even more difficult for such people to purchase a house. What measures/schemes will the Council put into place to alleviate this?
- 4.2.12 Has the Council taken into account the “artificial” raising of property prices that this funding scheme could have on Congleton, and what do they see as the impact? For example: How will it impact the migration of residents in and out of the area? Has this been taken into consideration during the analysis of the housing and population figures? What is the impact on business costs?

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- 4.2.13 How will the funding work in terms of ensuring the Link Road is constructed? We do not have any details on the contribution value per dwelling or how it will be applied or when it will start and on what houses/businesses it will be levied and this makes it impossible to understand what funds will be raised and how/when the funds will be used. For example, let's say there is an "average" £10,000 per house and only houses on the Strategic Sites incur the cost then the maximum that can be raised by 2030 is 2,200 x £10,000, circa £22m. Then there will also be whatever the contribution there is from other dwellings. When the phasing of house builds is taken into account this implies zero raised by 2015, £3.8m by 2020, another £8.2m by 2025 and another £10m by 2030. This is only a small percentage of the Link Road cost and would also imply it will be a long phasing period for the Link Road, undermining the capacity to generate new business/jobs. Perhaps a loan will be taken out to covers costs, so it would be beneficial to understand how this will work in the phasing and construction of the Link Road
- 4.2.14 Will this funding impact in any way the Council Tax Bands of the Strategic Site dwellings?
- 4.2.15 Will the Link Road cause an increase in the Council Tax for Congleton residents?
- 4.2.16 Cheshire East Council is still unable to defend housing developments (planning application appeals) outside of the Strategic sites, yet the Link Road is dependent on the developer funds from these sites. Unless Cheshire East Council is able to deliver a 5-Year housing supply and associated Local Plan we will not see houses developed on these sites and this will increasingly see the objectives of the Link Road become diminished.

5. Business Expansion

- 5.1. It is understood that one of the main objectives of the proposed Link Road is the ability to expand business and/or generate new business. A road in itself will not generate business. Congleton already has many business units vacant on the Radnor Park Site. What businesses does Cheshire East Council expect to attract to Congleton as a result of the Link Road? Has Cheshire East Council carried out a feasibility/viability study for what businesses may be attracted?
- 5.2. What measures will be in place to ensure that only suitable businesses will be attracted to the employment land so that they do not have a detrimental impact on the local residential communities? Once business units are developed landlords will be very keen to let-out units as quickly as possible with little thought to the local communities. Will Cheshire East Council also ensure that the deliveries to/from the new businesses are ONLY via the new Link Road so that the local infrastructure is not overburdened?
- 5.3. The Employment Land is located in residential areas so businesses that create large amounts of noise, require many deliveries, generate air pollution, require unsocial working and/or delivery times should not be allowed. This will limit the types of business that can be attracted to the business parks. Has this been taken into account?
- 5.4. Macclesfield and Crewe will be more accessible as a result of the Link Road and new businesses could be attracted to these towns. Has this been taken into account by Cheshire East Council?
- 5.5. We note that the Local Plan ignores the fact that two of the main business activities of the area are agriculture and tourism. We are particularly concerned that the land to be taken up for the Link Road is very good agricultural land and that some of the land-owners have not been consulted and appear to be reluctant. It was noted at a public meeting that two farmers expressed concern that their farms could be rendered unviable by unwelcome land acquisition.

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- 5.6. One of the criteria for sustainability of the businesses is to employ as many of the local community as possible. This should start as early as possible in a person's life. How will Cheshire East Council encourage local young people (e.g. school leavers) to choose to work locally so that they see the town as a viable and realistic employer?
- 5.7. Similarly, how has Cheshire East Council considered the needs of the older work force in its proposals to generate further employment?
- 5.8. How many new jobs in Congleton does Cheshire East Council expect the Link Road to generate? Congleton Town Council has an outrageously high figure of 3,500 new jobs for Congleton, implying over 200 new jobs per year during the 17 years remaining of the Cheshire East Council Local Plan period. It is noted that the advertisements in the town's local paper currently average 12 per week. The proposed increase does not seem feasible and that even at national level this rate of job generation would be considered overly optimistic.

6. Countryside

- 6.1. The Link Road will cut through open countryside to the north of Congleton of considerable landscape value. The area is characterized by ancient enclosures and fields which owe their existence to parliamentary enclosure in the late eighteenth and early nineteenth centuries. With a mix of pasture, hedge lines of mature trees, and scattered stands of what appear to be copse, it is what is known as bocage. This distinctive pattern of land use is associated with areas, like eastern Cheshire, that have always had scattered unnucleated settlement and a pastoral economy. Although locally much still survives, nationally bocage has largely succumbed to the demands of modern industrial agriculture. The proposed development to the south of the line of the link road will deface yet more and destroy a large part of the historic landscape setting of Congleton. As such, the proposed development will have a considerable effect on the character of Congleton. We need to consider the need for such large development sites, the Link Road and the value it actually brings to Congleton against the irretrievable destruction of our heritage and the damage to the tourist and farming industries
- 6.2. Giantswood Lane is of considerable landscape importance. The boundary between town and countryside is well defined here and the course of the lane thus frames the rural setting of Congleton in a way that is rarely paralleled. There are few towns in which the same can be said. The Link Road will destroy this impression.
- 6.3. There are a number of hedgerows and small copses within the routes of the Link Road. There needs to be a commitment to preserve such old areas of the landscape.
- 6.4. Will Cheshire East Council be carrying out any habitat surveys to ascertain what will be impacted by the Link Road and will Cheshire East Council safeguard the interests of the survey findings?

7. References

- 7.1. Cheshire East Local Plan Pre-Submission Core Strategy November 2013.