

## **Joint Statement Made on Behalf of Henbury Parish Council, Residents and Save Macclesfield Green Belt**

***with the full support of The Henbury Society, Macclesfield and West, Cllr Adam Schofield and Macclesfield West and Ivy, Cllr Nick Mannion***

To: Members of the Strategic Planning Board regarding planning applications 17/4034M, 17/4277M and 18/0294M either side of the A537 Chelford Road, Macclesfield to be considered on the 4th September 2018.

Dear Sir/Madam,

Firstly, we would like to state we are not against well planned sustainable development that does not negatively impact neighbours, air quality, safety or the environment.

There have been several material changes since the above sites were allocated in the local plan, not least of which is the designation of Broken Cross adjacent to the sites as an Air Quality Management Area where traffic pollution is above illegal levels.

We gratefully ask that you consider the following statement in your decision regarding development of the proposed LPS sites which will increase traffic in an already heavily congested main arterial route into Macclesfield and negatively affect the lives of residents who live and work in Broken Cross and surrounding area.

Henbury Parish Council has carried out its own independent and verified Traffic and Air Quality Assessments, however these have been ignored in favour of Developer's reports using abnormally low data.

Although we cannot influence your decision, we would like your decision to be made in consideration of all the facts available.

*Thank you.*

### **Issues regarding the Officer's Report for Planning Applications 17/4034M, 17/4277M and 18/0294M, Applications either side of A537 Chelford Road, Macclesfield**

On careful inspection of the Officer's Reports for the above applications it appears many important facts have been ignored. These are common sense matters that will have a serious impact on the health and well being of people living, working and using Broken Cross junction in Macclesfield now and in the future.

- Air Quality receptors (devices used to measure Air Quality) have been removed. New receptors have been placed so they will now give lower Air Quality figures against government guidance. Cheshire East and Developers clearly wants to sweep the Air Quality issue at Broken Cross 'under the carpet'. The area is an Air Quality Management Area. The Royal College of Physicians reported that 40,000 early deaths every year in the UK are from air pollution in 2016. There is **NO Air Quality Management Plan in place.**
- Developer's Air Quality Assessment, accepted by the Officers, is deeply flawed. Officers accept that Receptors have been 'chosen' by Developers. Developers have removed high reading Receptors from their modelling to 'adjust' air quality figures in favour of development. The Environmental Health report states ***'Taking into account the uncertainties with modelling, the impacts of the development could be significantly worse than predicted'***. Environmental Health do not state they support the applications and continue to state ***'any increase in concentrations within an AQMA is considered significant as it is directly converse to our local air quality management objectives, the NPPF and the Council's Air Quality Action Plan'***. More development will increase pollution.
- Traffic modelling has been carried out as if the junction is free flowing at 24 mph against Government Technical Guidance TG-16. This is totally unrealistic. The traffic causes the junction to be over capacity at peak times and these developments will add to this. Queue lengths are not reported accurately, therefore the Developer's modelling is inaccurate and should not be relied upon. Outside peak hours, the proposed traffic lights will cause standing traffic within the AQMA where there was none before. This has not been considered.
- Developer's have proposed access through the Local Wildlife Site, a Site of Biological Importance, on the southern edge of the site south of Chelford Road. This is contrary to Site Specific Principles of Developments for Site LPS 16 which states: **Any development proposals must avoid any impacts on Local Wildlife Sites. This should include indirect impacts resulting from changes in hydrology, hydrochemistry, air pollution and recreational impacts.**

- Large deposits of peat, a finite mineral, have been found to a depth of over 5 meters on the two sites north of Chelford Road. Developers plan to remove this and fill with hard core to stabilize the ground. Virtually all of 18/0294M is peat. Local Plan policy SE10, Sustainable Environment states: ***To achieve this, the council will:***  
***9. Not support proposals for peat extraction from new or extended sites***
- The Revised Transport Statement states the new proposed junction will not be implemented until 100 dwellings (plus the 31 on 18/0294M) are completed and occupied. At this stage a majority of the construction phase will be complete and the effects on the AQMA will have already occurred. The Developer's flawed reports states the signalized junction 'improvements' will also be above capacity at peak times well within 3 years, but in reality the junction will be over capacity on day one of construction - this is not a positive solution - Broken Cross AQMA pollution levels will increase significantly from day one of the construction phase.
- Pedestrian data used to design the proposed signalized junction at Broken Cross was collected the day years 11, 12 and 13 were absent from Fallibroome Academy - this should be carried out again to ascertain realistic figures.
- Where are the children going to be educated? The reports state all children will go to their nearest school but in reality all schools are over subscribed now - there were only two spare secondary school places in 2017. This will mean more car journeys to get pupils to schools out of area, more congestion, more pollution. Unsustainable.
- These applications have not considered the council's 'Home to School' Travel Policy and the developments are contrary to Sustainable Modes of Transport for Schools. New policies apply from 1st September 2018. All children above 11 years old will be Criterion 1 and require the council to provide transport to school as there are no school places within 3 miles, unless the council has negotiated with The King's School that all the children above 11 years will go there.
- There are no figures given for traffic increase from the new King's School site, for either the construction phase or when completed. The school could potentially create another 2000 vehicle movements per day, a majority of which could go through Broken Cross.
- The cumulative effects from other development sites have not been considered. There are many sites within 1 mile - Bollin Meadow, two sites on Birtles Road etc. which will all add to to pollution and congestion at Broken Cross AQMA - this needs to be addressed properly for development to be sustainable.
- Flooding and surface water discharge have not been fully investigated. A majority of all the surface water from all 3 sites, laden with human generated pollutants, will be directed through Cock Wood a Site of Biological Importance.
- Access to 17/4277M, land north of Chelford Rd is not to current technical specifications. Chelford Rd is not sufficiently wide to accept 3 lanes at the point opposite the Cock Public house, the proposed access point.
- Pedestrian safety has not been considered. The junction proposals call for pedestrians to wait 3 cycles of the traffic lights, some 9 minutes, in the afternoon peak would make people, particularly school children, 'chance it' across the 3 lanes of traffic on the A537 'The most dangerous road in Britain'. This is not a safe proposal.
- Any queue lengths reduced on the A537 by the Developer's junction modifications will have a negative knock on effect by increasing queues on all the other arms of the junction.
- There is no consideration of the Tesco Local store adjacent to the roundabout. Traffic entering and exiting this store will greatly affect the operation of the junction as it does now affect the roundabout. No modelling has been done for this.

In conclusion, given all of the above, we can see that the negative effects of these developments on Broken Cross AQMA will increase the already illegal levels of pollution, increase congestion, increase the negative the effects on the environment from flooding and pollutants contained within surface water discharge and reduce safety at Broken Cross junction. This is genuinely a bad proposal for south west Macclesfield. The proposed junction re-design will not mitigate these important issues, therefore we would ask you to consider refusal of the above applications.