

PETER J YATES BA (Hons) M Phil MRTPI responding on behalf of Sutton Parish Council to the Inspector's Questions 120, 121 & 122 in the MIQ in relation to Matter 8 Natural Environment, Climate Change and Resources, Landscape Character (Policy ENV3).

Introduction.

Sutton Parish Council has engaged with the Cheshire East Local Plan process (Parts 1 and 2) at every public consultation and were represented at the Examination into Part 1 of the Plan. For Part 2 it has submitted representations on both the Publication Draft SADPD (August 2019) and the Revised Publication Draft SADPD (October 2020). These include issues relating to Infill Villages & Village Boundaries, and Local Landscape Designation Area boundaries. Those aspects which relate to Local Landscape Designation Area boundaries (Policy ENV3) are focussed on in responding to question 121 in Matter 8.

Landscape Character (Policy ENV 3).

Question 120. Does Policy ENV 3 serve a clear purpose and avoid unnecessary duplication of Policy SE4 in the LPS in seeking to ensure that the effect of development proposals on the landscape of Cheshire East is informed by the Cheshire East Landscape Character Assessment? As such is it consistent with paragraph 16(f) of the NPPF?

No. Policy ENV 3 is not consistent with paragraph 16(f) of the NPPF.

In addition, it is not consistent with paragraph 16(d) of the NPPF which states that Plans should:

(d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

The wording of **Policy SE4 The Landscape** covers both the built and natural environment, with **paragraphs 3 & 4 addressing LLDA's**. These two paragraphs contain more specific guidance than **Policy ENV 3**, which is **vague** and **superficial** and **open to wide interpretation**. It also attaches policy weight to the LLCA, which has no status as a Supplementary Planning Document, and subsequent updates, as well as taking into account future development.

It would be more appropriate for more detailed and area specific policy guidance in the SADPD.

Para 13.34 of the **LPS** did refer to the sort of advice or guidance which was to be published for areas of particular distinctiveness such as the Peak Fringe and the Alderley Edge sandstone escarpment. This has not resulted in any policy references in the SADPD.

Question 121. Is the spatial extent of the Local Landscape Designations (LLDs), updated through the Cheshire East Local Landscape Designation Review and defined on the Draft Adopted Policies Map, as part of the production of the SADPD, justified by the evidence? In particular for the following:

(b) the exclusion of the land at Lyme Green between London Road and the Macclesfield canal from the western edge of the Peak Park Fringe LLD?

No. There is a lack of justification for the change or the proposed new boundary.

In addressing the issue of **Local Landscape Designation Areas** there is **Policy SE4 The Landscape** in the **LPS (2017)** which has **paragraphs 3 & 4**, which seek to conserve and quality of the landscape in **LLDAs** from development, which is likely to have an adverse effect on their character and appearance.

Point 4 refers to several supporting documents including the Cheshire East Landscape Character Assessment & the Local Landscape Designation Study.

The **Cheshire East Local Landscape Designation Review (ED11) May 2018** updated the Local Landscape Designation Areas, the boundaries of which are shown on the Draft Adopted Policies Map.

These **LLDAs** replace the **Areas of Special County Value for Landscape** which are shown on the **Proposals Maps** of the current **Local Plans for Congleton, Crewe and Macclesfield**. The ASCVs have been part of the Development Plan for over 30 years. It is therefore appropriate to review the boundaries in the light of the large-scale development proposals in the Local Plan Strategy. In Sutton Parish this has resulted in the allocation of a **Strategic Housing Site (LPS 17)** on an **ASCV at Lyme Green** for over 300 houses.

The **LLDR (May 2018)** in the **section (P15)** dealing with the **Peak Fringe changes proposed to the ASCV boundaries**, has the following “Boundary commentary” in relation to the Lyme Green area:

“Exclude built up area at Lyme Green and lower lying areas to the west of the settlement, and west of the canal”

It is understood why the area relating to the west of the settlement is to lose its ASCV designation, as it is allocated as a Strategic Housing site (LPS 17), but there is no detailed evidence to justify the exclusion of the land west of the canal. The wording relating to this area is not clear, although the various **Figures 3.1. 3.2 and 3.33 show the area of land it relates to as the land north of Lyme Green between the Macclesfield Canal and the A 523.**

The Figures are not the easiest to interpret, but **Figure 3.2 Candidate Local Landscape Designation Areas showing relationship with Cheshire East ASCVs**, clearly shows that the eastern boundary of the built-up area of Macclesfield is identified as the boundary of the LLDAs except to the south east between the Business Park and the canal. The setting of the town of Macclesfield to the east is defined by its relationship with the Peak District National

Park, & this has not changed over the past 30 years. Where Strategic Sites have been allocated (Lyme Green (LPS 17) and Fence Avenue (LPS 14) these have been excluded from the ASCV, **but there is no reasoned argument for moving the boundary from the well defined boundary (A523) of the built up area, to the canal.**

In terms of the landscape, the LLDR highlights the importance of the views within and out of the Peak Fringe, but makes **no reference to the views out of Macclesfield into the Peak Fringe.** The views towards the Peak District National Park from the A523 to the south of the football ground, take in all the features which help to define the Peak Fringe.

Boundary definition is difficult as it gives the impression on a map that there is a sharp change from one landscape to another, whereas on site the boundary between landscape character areas rarely changes abruptly. This is very self-evident on the site east of London Road. The canal is not visible in the landscape as it is set down behind a hedgerow, and the impression on the ground is that the pasture land on either side of it is continuous, and the hedgerow, which conceals it, is one of the field boundaries which characterise the area.

However, the **A523 road provides many of the attributes required in boundary definition:**

- It is well defined, both on a map, and on the ground.
- It is permanent and substantial.
- It provides a clear line of demarcation between the built-up area of Macclesfield and the LLDA.
- If used to define the boundary of the LLDA, it would be consistent with the approach taken to boundary definition for the Peak Fringe LLDA on the east side of Macclesfield.

There no detailed evidence in the Local Landscape Designation Review (ED11) to justify the boundary change from the ASCV boundary, which has successfully protected the quality of the landscape from development, which is likely to have an adverse effect on its character and appearance and setting.

In the light of the above it is recommended that the western boundary of the LLDA, the Peak Fringe, should be moved from Macclesfield Canal north of Lyme Green to the A523 London Road. In terms of detailed boundaries these should follow those on the Proposals Map of the Macclesfield Borough Local Plan (2004).

Question 122. For clarity and effectiveness, should the LLDs and their identified qualities be referenced in Policy ENV 3, so it is clear how decision makers should assess development proposals within them?

Yes. The LLDAs should be referenced in Policy ENV 3, and their specific qualities identified, together with the detailed policies which protect and enhance those qualities. These should not be a repeat of the policies within Policy SE4 of the LPS.

The current Policy ENV 3 should be deleted, and replaced by a new Policy ENV 3 based on the above.

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